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Attorney for Plaintiff and the Aggrieved Employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

RITCHIE ROBINSON, an individual, on behalf
of the State of California, as a private attorney
general

Plaintiff,

v.

S T MOLL, INC. DBA INTEGRITY TIRE, a
corporation; BIG BRAND TIRE COMPANY,
INC., a corporation; CHRIS MOLL, an
individual; STEVE MOLL, an individual; TINA
MOLL, an individual; and DOES 1 thru 50,
inclusive,

Defendants.

Case No. CIVSB2129140

Assigned for All Purposes to:
Hon. Joseph T. Ortiz, Dept. s-17

**DECLARATION OF MAKENNA SNOW
OF ILYM GROUP, INC., REGARDING
DISBURSEMENT OF SETTLEMENT
FUNDS**

Date: May 31, 2023
Time: 8:30 AM
Dept: S-17

1 I, Makenna Snow, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a
3 Case Manager for ILYM Group, Inc. (hereinafter referred to as “ILYM Group”), the professional
4 settlement services provider who has been retained by the Parties and subsequently appointed by
5 the Court to serve as the settlement administrator for the above-captioned *Robinson v. S T Moll,*
6 *Inc., dba Integrity Tire et al.* matter. I am authorized to make this declaration on behalf of ILYM
7 Group. The following statements are based on my own personal knowledge and information
8 provided by other ILYM Group employees working under my supervision and, if called upon to
9 testify, I could and would testify competently to such facts.

10 2. ILYM Group was engaged by the Parties’ Counsel and subsequently approved and
11 appointed by the Court to provide notification services and settlement administration, pursuant to
12 the terms of the Settlement, in the above-referenced Action. Duties performed, and to be performed,
13 include: (a) taking receipt of and safeguarding the settlement amount and establishing a Qualified
14 Settlement Fund (“QSF”); (b) calculating, processing, and mailing the Individual PAGA settlement
15 award checks; (c) preparing, issuing and filing tax returns and other applicable tax forms; (d)
16 handling the distribution of any unclaimed funds pursuant to the terms of the Settlement; and (e)
17 performing other tasks as the Parties mutually agreed to and/or the Court ordered ILYM Group to
18 perform.

19 3. The total amount received under the settlement was \$400,000.00. The breakdown is
20 as follows:

- 21 a. \$57,916.67 for the Individual PAGA Payments to the 254 Aggrieved Employees.
- 22 b. \$133,333.33 for payment of Attorney fees.
- 23 c. \$10,000.00 for payment of Attorney costs.
- 24 d. \$10,000.00 for the Individual Release Payment to Plaintiff Ritchie Robinson.
- 25 e. \$5,000.00 for the Enhancement Payment to the Plaintiff Ritchie Robinson.
- 26 f. \$10,000.00 for payment of the administration fees to ILYM Group.
- 27 g. \$173,750.00 for the PAGA payment to the California Labor and Workforce
28 Development Agency.

1 4. On March 8, 2023, the payment of Class Counsel's attorney fees and costs, in the
2 amount of \$143,333.33, was completed to Kingsley & Kingsley, APC.

3 5. On March 9, 2023, payment of the settlement administration fees to ILYM Group, in
4 the amount of \$10,000.00, was completed.

5 6. On March 9, 2023, ILYM Group issued and mailed the PAGA payment to the LWDA,
6 in the amount of \$173,750.00.

7 7. On March 9, 2023, ILYM Group issued and mailed an Individual Release Payment to
8 Ritchie Robinson, in the amount of \$10,000.00.

9 8. On March 9, 2023, ILYM Group issued and mailed an Enhancement Award to Ritchie
10 Robinson, in the amount of \$5,000.00.

11 9. On March 9, 2023, ILYM Group issued and mailed the settlement award checks to the
12 254 Aggrieved Employees. The total amount sent to the Aggrieved Employees was \$57,916.67.

13 10. The deadline for the Aggrieved Employees to cash their settlement award check is
14 June 7, 2023, 90 days after its issuance.

15 11. On July 7, 2023, (30 days after the check void date), in accordance with the terms of
16 the Parties' Settlement Agreement, the necessary paperwork to report the unclaimed funds will be
17 sent to the California State Controller's Office - Unclaimed Property Fund. In this submission, we
18 provided the name, contact information, social security number, and unclaimed amount for each
19 individual. ILYM Group will continue to hold these unclaimed funds until such time it is required
20 to transfer said funds to the State Controller's Office subsequent to the following process: the State
21 Controller's Office will then use the information provided in the aforementioned paperwork to
22 contact the individuals to notify them that they have unclaimed funds and how to obtain them. On
23 a future date assigned by the State Controller's Office, ILYM Group will send the Holder Remit
24 Reminder Letter to the State Controller's Office with the updated final unclaimed amount and
25 aggrieved employees name and contact information of who remain unclaimed and then, transfer all
26 unclaimed funds to the State Controller's Office at its instruction. This process usually takes about
27 8-9 months until we receive the letter from the State Controllers' Office instructing us when to send
28 the money.

1 ///

2 I declare under penalty of perjury under the laws of the State of California and the United
3 States that the foregoing is true and correct to the best of my knowledge and that this Declaration
4 was executed this 17th day of May 2023, at Tustin, California.

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Makenna Snow
MAKENNA SNOW

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(PROOF OF SERVICE)

[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On May 18, 2023, I served all interested parties in this action the following documents described as: **DECLARATION OF MAKENNA SNOW OF ILYM GROUP, INC., REGARDING DISBURSEMENT OF SETTLEMENT FUNDS** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Terrence Greene

tgreene@DelmoreGreene.com

Ross Poole

rpoole@DelmoreGreene.com

DELMORE GREENE

One America Plaza

600 West Broadway, Suite 400

San Diego, CA 92101

[XX] **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] **(BY ELECTRONIC MAIL TRANSMISSION):** I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 18, 2023, at Los Angeles, California.


Taylor Gregg