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Attorneys for Plaintiffs
Trung Le and Kevin Lam

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

TRUNG LE, individually, KEVIN LAM,
individually, and on behalf of other members
of the general public similarly situated,

Plaintiff,

v.

M4D LLC, and DOES 1 through 25,

Defendants.

) **CASE NO.: 30-2021-01182977**
) [Honorable Judge Melissa R. McCormick,
) Dept. CX104]
)
)

) **SUPPLEMENTAL DECLARATION OF**
) **TARUS DANCY IN SUPPORT OF**
) **PLAINTIFF'S MOTION FOR FINAL**
) **APPROVAL OF CLASS ACTION**
) **SETTLEMENT AND REQUEST FOR**
) **ATTORNEYS' FEES, COSTS, AND**
) **CLASS REPRESENTATIVE SERVICE**
) **SERVICE PAYMENT**
)

) **Date: February 1, 2024**
) **Time: 2:00 p.m.**
) **Dept.: CX104**
)
)

) FAC Filed: August 11, 2022
) Complaint Filed: February 5, 2021

1 I, TARUS DANCY, DECLARE AS FOLLOWS:

2 1. I am employed by CPT Group, Inc., the court appointed class action claims
3 administrator, as Supervising Case Manager for *Le et al. v. M4D, LLC* and have personal knowledge
4 of the facts set forth in this Declaration, and if called as a witness, could and would testify competently
5 thereto.

6 2. CPT Group has extensive experience in providing notice of class actions and
7 administering class action settlements. For over thirty (30) years, we have provided notification
8 and/or settlement administration services in over one thousand class action cases.

9 3. I submit this Supplemental Declaration to update my prior Declaration dated January
10 10, 2024.

11 4. Pursuant to the Settlement Agreement, deadlines for Class Members' written
12 objections, Challenges to Workweeks and/or Pay Periods, and Requests for Exclusion were extended
13 an additional 14 calendar days beyond the 60 day response period, or until February 2, 2024, for all
14 Class Members whose notice is re-mailed.

15 5. As of the date of this declaration, three (3) Notices have been returned to our office
16 from the U.S. Post Service as undeliverable and none have been forwarded directly by the U.S. Postal
17 Service to a forwarding address. A total of four (4) Notices were remailed throughout the
18 administration as a result of skip trace efforts utilizing Accurint, forwarding addresses provided by
19 the U.S Postal Service and Class Member requests. A total of one (1) Notice remains undeliverable.

20 6. The deadline for Class Members to dispute the number of Workweeks used to
21 calculate their Settlement shares is January 19, 2024. As of the date of this declaration, CPT has not
22 received any disputes.

23 7. The deadline for Class Members to request exclusion from the Class portion of the
24 Settlement is January 19, 2024. As of the date of this declaration, CPT has not received any Requests
25 for Exclusion.

26 8. The deadline for Class Members to object to the Settlement is January 19, 2024. As
27 of the date of this declaration, CPT has not received any Objections to the Settlement or any portion
28 thereof.

9. CPT will report that a total of 87 Class Members are part of this Settlement, which represents a 100% participation rate.

I declare that under the penalty of perjury under the laws of California the foregoing is true and correct. Executed this 24th day of January 2024 in Irvine, California.


Tarus Dancy

PROOF OF SERVICE
STATE OF CALIFORNIA

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is: 161 Fashion Lane, Suite 207, Tustin, Ca 92780. On January 24, 2024, I served the within document(s):

- **SUPPLEMENTAL DECLARATION OF TARUS DANCY IN SUPPORT OF PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND REQUEST FOR ATTORNEYS' FEES, COSTS, AND CLASS REPRESENTATIVE SERVICE PAYMENT**

In the matter of **Le v. M4D LLC, 30-2021-01182977**

on the following interested party(ies) in this action:

O'HAGAN MEYER LLP Katherine C. Den Bleyker kdenbleyker@ohaganmeyer.com William B. Richards, Jr. wrichards@ohaganmeyer.com Tatyana Esmailian tesmailian@ohaganmeyer.com 550 S. Hope Street, Suite 2400 Los Angeles, California 90071 Tel: (213) 423-6006	Representing: Defendant(s): M4D LLC
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(By Mail) The envelope was mailed with postage thereon fully prepaid. As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Tustin, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.



(By Hand Delivery) I delivered the within documents to the attorney service for delivery to the person(s) at the address(es) set forth below with instructions that such envelope be delivered personally



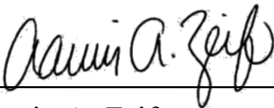
(By Overnight Mail) I am readily familiar with the firm's practice of collection and processing correspondence for mailing with FedEx. Under that practice it would be deposited with FedEx on that same day thereon fully prepaid at Tustin, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on that date following ordinary business practices.



(By Electronic Mail) The document listed above was transmitted via email to the email address(es) noted above

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 24, 2024, at Tustin, California



Aarin A. Zeif