

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 24, 2024.

11 4. As of the date of this declaration, CPT will report that a total of 87 Class Members are
12 part of this Settlement, which represents a 100% participation rate and 11,219.02 total weeks worked
13 by Participating Class Members.

14 5. Plaintiff Kevin Lam is to receive an estimated gross settlement payment in the amount
15 of \$11,519.71, an estimated PAGA payment in the amount of \$181.32 and a Class Representative
16 Award in the amount of \$10,000.00 for a total consideration of \$21,701.03.

17 6. From the Gross Settlement Amount, 25% of the PAGA Penalties, or \$6,250.00, will
18 be allocated to Aggrieved Employees who worked between February 5, 2020 and August 28, 2022
19 to reflect the PAGA Payment.

20 7. The estimated average PAGA payment to each Aggrieved Employee is \$130.21. The
21 highest estimated PAGA payment is \$181.32. The lowest estimated PAGA payment is \$6.98.

22 8. Due to the costs associated with escheating unclaimed funds to the California State
23 Controller's Office, in lieu of a *cy pres* beneficiary, along with establishing a case specific email
24 address, CPT has increased the costs associated with the administration of the Settlement from
25 \$8,000.00 to a total amount of \$9,000.00. The cost adjustment includes all costs incurred to date, as
26 well as estimated costs involved in completing the Settlement. A copy of the invoice substantiating
27 costs involved in completing the Settlement is attached hereto as **Exhibit B**.
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2 I declare that under the penalty of perjury under the laws of California the foregoing is true
3 and correct. Executed this 31st day of January 2024 in Irvine, California.

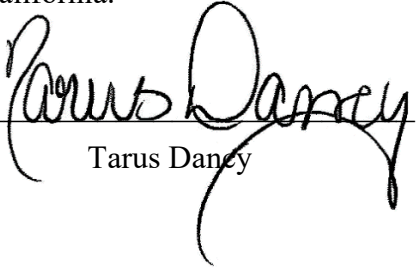
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EXHIBIT B

Le v. M4D LLC

All-In Settlement

Class Size: 87
Opt-Out Rate: 0.00%
No. of Checks Issued: 87
Postage Total: \$163.09
Grand Total: \$11,742.49
DISCOUNTED FLAT FEE: \$9,000.00

CASE SETUP

Upon Intake of the Data, CPT will Scrub all Records to a Useable Format to Reduce Duplicates, Anomalies and Increase the Success Rate of Deliverability of the Class Notice. Class Members will be Assigned a Unique Mailing ID which will be Used Throughout Administration. Notice will be Translated into Vietnamese. CPT will Setup and Maintain a Static Website and a Dedicated Case Email Address.

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Project Manager: Case Intake & Review	\$95.00	1	\$95.00
Programming: Data Base Setup	\$150.00	1	\$150.00
Vietnamese Translation	\$1,200.00	1	\$1,200.00
Static Website	\$500.00	1	\$500.00
Dedicated Case Email Address	\$150.00	2	\$300.00
TOTAL			\$2,245.00

DIRECT MAIL NOTICE

To Ensure Mailing to the Most Current Address Possible, CPT will Perform an Address Update via NCOA. CPT will Mail a Full-Length Notice & 1-Page Exclusion Form in English and Vietnamese.

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Project Manager: Format Documents	\$95.00	2	\$190.00
National Change of Address Search (NCOA)	\$135.00	1	\$135.00
Print & Mail Notice Packets	\$1.50	87	\$130.50
First-Class Postage (up to 2 oz.)	\$0.87	87	\$75.69
TOTAL			\$531.19

PROCESS RETURNED UNDELIVERABLE MAIL

Based On CPT's Historical Data, 6% of the Notices will be Returned Undeliverable. Upon Receipt, CPT will Perform a Skip Trace in an Attempt to Obtain a Current Address; Thus, 91% of the Notice Packets are Remailed.

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Clerical Staff	\$60.00	1	\$60.00
Update Undeliverable Mail Database	\$0.50	1	\$0.50
Skip Trace for Best Address	\$1.00	3	\$3.00
Print & Remail Notice Packets	\$1.50	4	\$6.00
First-Class Postage (up to 2 oz.)	\$0.87	4	\$3.48
TOTAL			\$72.98

OPT-OUT PROCESSING

CPT will Process and Validate all Opt-Outs and Other Responses from Class Members. Deficient Opt-Outs will Receive a Deficiency Notice by Mail and Provide an Opportunity to Cure. CPT will Scrub the Filed Opt-Outs to Eliminate Duplicates, Fraudulent, and Otherwise Invalid.

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Programming: De-duplication/Scrubbing	\$150.00	1	\$150.00
Project Manager: Validate Opt-Out Requests	\$95.00	0	\$0.00
Clerical Staff	\$60.00	0	\$0.00
Opt-Out & Change of Address Processing	\$2.00	0	\$0.00
Print & Mail Deficiency/Dispute Notices	\$1.50	0	\$0.00
First-Class Postage (up to 1 oz.)	\$0.66	0	\$0.00
Review & Process Deficiency Responses	\$10.00	0	\$0.00
		TOTAL	\$150.00

TELEPHONE SUPPORT

CPT will Maintain a Toll-Free Phone Number with IVR Capabilities and Live Class Member Support Representatives During Normal Business Hours, Monday-Friday, 9:00 AM - 5:30 PM, PT. The Dedicated Case Phone Number will Remain Active Up to 120 Days After Disbursement.

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Toll-Free Number Establish/Setup	\$150.00	2	\$300.00
Live Call Center Support Reps.	\$3.00	10	\$30.00
		TOTAL	\$330.00

SSN VERIFICATION

Verify SSN for Validity with IRS / IRS Backup Withholdings

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Programming: SSN Selection	\$150.00	1	\$150.00
Department Manager: Analysis & Reporting	\$95.00	3	\$285.00
IRS SSN Verification	\$0.10	87	\$8.70
		TOTAL	\$443.70

DISTRIBUTION SERVICES

CPT will Establish and Manage the Qualified Settlement Fund (QSF) for up to One Year After Disbursement. Upon Approval, CPT will Perform all Necessary Calculations and Disburse Funds. CPT will Mail an 8.5"x11" MICR Check to Valid Claimants. CPT Uses a Payee Positive Pay System to Reconcile Checks Cash and Conducts Monthly Account Reconciliations for the QSF.

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Programming: Calculation Totals	\$150.00	3	\$450.00
Project Supervisor: Review of Distribution	\$150.00	3	\$450.00
Project Manager: Correspondence w/Parties	\$95.00	2	\$190.00
Programming: Setup & Printing of Checks	\$150.00	3	\$450.00
Obtain EIN, Setup QSF/Bank Account	\$150.00	3	\$450.00
Print & Mail Notice, Checks & W2/1099	\$2.50	87	\$217.50
First-Class Postage (up to 1 oz.)	\$0.68	87	\$59.16
		TOTAL	\$2,266.66

POST-DISTRIBUTION & TAX REPORTING

Any Check Returned Undeliverable is Skip Traced to Locate a Current Address and Remailed Accordingly. CPT will Process Requests for Check Reissues Continuously. CPT Prepares Annual Tax Reporting on Behalf of the QSF and Federal and State Taxes in Accordance with Current State and Federal Regulations. Upon the Conclusion of the Settlement, a Final Report and Declaration will be Provided to all Parties.

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Project Supervisor: Account Reconciliation	\$150.00	12	\$1,800.00
Update Undeliverable Checks Database	\$0.50	7	\$3.50
Skip Trace for Best Address	\$1.00	7	\$7.00
Remail Undeliverable Checks	\$2.50	6	\$15.00
First-Class Postage (up to 1 oz.)	\$0.68	6	\$4.08
Re-Issue Checks as Required	\$5.00	5	\$25.00
First-Class Postage (up to 1 oz.)	\$0.68	5	\$3.40
Project Supervisor: Reconcile Uncashed Chk	\$150.00	1	\$150.00
Programming: Weekly & Final Reports	\$150.00	2	\$300.00
Project Supervisor: Final Declaration	\$150.00	2	\$300.00
Project Manager: Account Files Sent to Atty	\$95.00	2	\$190.00
CA Tax Preparation	\$600.00	1	\$600.00
Annual Tax Reporting to IRS	\$1,000.00	1	\$1,000.00
QSF Annual Tax Reporting	\$500.00	1	\$500.00
TOTAL			\$4,897.98

SCO ESCHEATMENT PROCESSING

Escheatment Processing to the State Controller Unclaimed Property Division / Uncashed Check Rate 21%

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
UPEnterprise Reporting Services	\$0.15	18	\$2.70
Project Supervisor: Review of SCO Reports	\$150.00	1	\$150.00
Certified Mail Report to SCO	\$8.64	1	\$8.64
Project Manager: Remittance	\$95.00	3	\$285.00
Certified Mail Report to SCO	\$8.64	1	\$8.64
Add'l QSF Annual Tax Reporting	\$350.00	1	\$350.00
TOTAL			\$804.98

GRAND TOTAL \$11,742.49

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 31, 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**
- **SUPPLEMENTAL BRIEF IN SUPPORT OF PLAINTIFF LAM'S MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT**
- **[PROPOSED] ORDER/JUDGMENT**

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



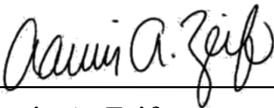
(By Overnight Mail) I am readily familiar with the firm's practice of collection and processing correspondence for mailing with FedEx. Under that practice it would be deposited with FedEx on that same day thereon fully prepaid at Tustin, California in the ordinary course of business. The envelope was 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 31, 2024, at Tustin, California



Aarin A. Zeif