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Attorneys for Plaintiff
LUIS BORQUEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

LUIS BORQUEZ, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

OXFORD HOTELS AND RESORTS, LLC, a
Delaware limited liability company dba THE
GODFREY HOTEL HOLLYWOOD; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 22STCV35743

*[Case Assigned for all purposes to the Hon.
Carolyn B. Kuhl, SSC-12]*

**DECLARATION OF DENISE ISLAS OF
SIMPLURIS IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: February 26, 2026
Time: 10:30 a.m.
Dept.: SSC-12

Action filed: November 10, 2022
Trial Date: None set

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I, DENISE ISLAS, declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to
I could and would do so competently under oath.

2. I am employed by Simpluris as Senior Director of Client Services.

3. Simpluris has never had any financial interests in nor affiliation with the parties or counsel involved in the *Luis Borquez v. The Oxford Hotels and Resorts, LLC* matter.

4. Simpluris has extensive experience administering class action matters. Simpluris has administered complex wage and hour, labor and employment, consumer/ product liability, FLSA, FACTA, ERISA, and PAGA class action matters, through final approval and settlement. Simpluris has developed a system of quality assurance measures to ensure the highest quality service is provided in our cases and to class members.

5. Simpluris' Claims Management Group has extensive experience in all aspects of Notification and Identification of Class Members, Claims Processing, Formulation and Distribution Methodologies, Award Distribution and Taxation, Accounting and Reconciliation.

6. Simpluris has extensive experience in and are experts at all aspects of complex litigation matters including; (i) preparing, printing, mailing and tracking privacy notices; (ii) operation of a 24/7/365 multi-lingual call center; (iii) establishing settlement websites; (iv) claims management; (v) USPS processes and systems, third party tracing, including the use of reverse address verification; (vi) database management, programming and security protocols; (vii) processing and issuing settlement payments; (viii) tax management, filings, and accounting; and (ix) final approval.

7. Simpluris has been appointed as a Claims Administrator in both State and Federal

8. A true and correct copy of Simpluris' Curriculum Vitae is attached hereto as **Exhibit A**.

9. This Administration project has a fixed rate that shall not exceed \$17,500.00, which includes costs associated with mailing the Notice Packet in both English and Spanish. A detailed breakdown of Simpluris' cost is attached hereto as **Exhibit B**.

I declare under penalty of perjury under the laws of the United States and the state of California, that the foregoing is true and correct.

Executed on November 5, 2025, in Costa Mesa, California.

Denise Islas

Denise Islas

EXHIBIT A

Simpluris, an award winning claims administrator, has administered over 9,000 matters, managed over \$9 billion in settlement funds, and provided its services for over 15 years. Our beginning-to-end services include complete project management, mailings & notification campaigns, contact center, legal intake, data management, disbursements & tax reporting, among others.

Services

Class Action Administration

Simpluris class action and claims administration offers comprehensive settlement planning, execution, and reporting. When you bring a case to Simpluris, our team reviews each matter independently. Our subject matter experts leverage their experience to develop a settlement framework designed to meet the unique aspects of your matter. We take a consultative approach to address your challenges and support preliminary hearing preparation.

Mass Arbitration Administration

Simpluris can provide the technology and operational fulfillment resources needed to manage mass arbitrations from intake to payment in a cost-effective and efficient manner. At Simpluris, we pride ourselves on having an average of 93.5% signed releases. We have experience administering some of the largest mass arbitration cases, including Uber, Lyft, Instacart, Grubhub, Postmates, and DoorDash. Simpluris delivers solutions for matters of any size and complexity.

Regulatory Remediation

Whether internally initiated or formally required by a consent order, Simpluris aids respondents in meeting critical obligations and deadlines. Simpluris is prepared to plan and execute remediation actions tailored to your institution's size and needs. As a third-party administrator, we understand the importance of swift remediation and provide "white glove" customer service from planning, to execution, through final reporting.

Legal Corporate Services

Simpluris' services scale and adapt to meet our client's challenges. We excel at comprehensive settlement administration and remediation; however, we understand that our client's needs include a combination of many legal corporate services. No matter how simple or complex, we ask you to bring us your unique challenges so we may develop a custom solution to fit your needs.

Data Security

Simpluris is committed to the security and overall protection of its customer's data and information. We maintain SOC 1 and SOC 2 certification which requires us to adhere to strict policies and procedures surrounding information security including processing and storage of confidential customer data. Simpluris has and maintains a comprehensive, written Information Security Program that complies with all applicable laws and regulations (e.g. HIPAA, Gramm-Leach-Bliley Act, MA 201 CMR 17.00).

Executive Team

Simpluris' history is rooted in class action settlement administration and our management team's experiences are vast and diverse. The Simpluris executive leadership team boasts more than 100 years of experience in corporate, financial and legal administration, including:

- Executive management of the largest legal administration operation in the world that produced 200+ million notifications, 10+ million claims and \$5+ billion funds disbursed per year on average.
- A few of the most notable matters our leadership team has presided over include the largest data breach responses, corporate restructures and antitrust settlement administrations in US history.
- Oversight of the largest consent orders handed down from OCC, DOJ, CFPB & FTC over the last decade.
- Fostering hundreds of client relationships with the premier government entities, law firms and financial institutions in the world.

The Simpluris executive team - Kevin Lee, President & CEO; Doug Norman, SVP Business Operations; Zach Hoffman, Founder, CTO; Patrick Ivie, CRO; Wes Alford, SVP; and Paul Saroj, SVP - are experienced industry experts. Leveraging our past experiences, Simpluris is prepared to handle matters of every scope and scale.

Technology

From Simpluris' inception, our founders had a vision to develop a single comprehensive platform, purpose-built to serve the legal administration industry. Today, our proprietary technology platform, named Cadence, increases data security, mitigates errors caused by siloed databases, and speeds processes by improving transparency and collaboration between departments. Cadence is an innovative and evolving administration engine that sets our case management apart from all other legal administrators. From data ingestion, noticing, and claims processing, through disbursement, taxation, and final reporting, our project management processes are conducted inside Cadence. We see the future of legal tech evolving and are continuously developing our solutions to meet the administration needs of tomorrow.

Client Service

The Simpluris administration team is best known for their dedication to delivering premium service. When you partner with Simpluris, you work alongside a dedicated client service representative. This Simpluris team member will guide you through the settlement life cycle. Your client service representative is your administration conductor, adjusting the tempo as your case progresses. With a comprehensive view of your matter, your client service representative can respond swiftly to changes in your case, proactively notify you of upcoming milestones, and most importantly, be accountable for the successful completion of your matter.

Our team is available any time of day with offices across the nation, including two corporate hubs in Costa Mesa, CA and Orlando, FL.



(800) 779-2104
3194-C Airport Loop Dr.,
Costa Mesa, CA 92626
simpluris.com



EXHIBIT B

Estimate Number:	20250917-PJI-01	Prepared By:	Patrick J. Ivie
Estimate Date:	9/17/2025	Telephone Number (mobile):	310.995.6455
Estimate Expiration Date:	12/16/2025	Email:	pivie@simpluris.com

Attorney Contact
Attorney: **Milan Moore, Esq.**
Firm: Lidman Law, APC
Email: mmoore@lidmanlaw.com

Opposing Counsel Contact
Attorney:
Firm:
Email:

Case Name: *Luis Borquez v. The Oxford Hotels and Resorts, LLC*
LA County Superior Court
Class and PAGA Settlement

Assumptions

In addition to the assumptions enumerated below, this estimate assumes that

- (1) Simpluris will receive data in a single, complete file; (2) there will be no substantial change to class size or in response rate;
- (3) administration costs will be paid from the QSF, and (4) Simpluris will submit revisions to this estimate to account for any material changes to scope.

Anticipated Class Size:	915	Undeliverable Rate:	10%
Claims Rate:	N/A	Mail Skip Trace Success Rate:	85%
Opt-out Rate:	1%	Call Rate:	4%
Language(s) for Communication	EN/SP	Average Call Length:	4 Minutes
Reminder Mailing:	N/A	Fund Distribution:	Simpluris
Unclaimed Funds:	Escheat	Number of Distributions:	1
State(s):	CA	Tax Year(s):	1
Length of Administration:	9 Months		

Case Setup

- Class website: Static website with FAQs, court documents, etc.
- Data compilation: develop case-specific response tracking

Category	Unit Value	# of Units	Total
Project Manager - Case Setup	\$110.00	2	\$220.00
Static Class Website	\$450.00	1	\$450.00
Website Hosting and Security Monitoring and Tracking	\$90.00	9 Months	\$810.00
Database Manager - Initial Data Analysis	\$125.00	3	\$375.00
Total:			\$1,855.00

Notice and Communications

- Spanish Translation of the class Notice
- 10-page class Notice, sent by First Class US Mail, in English and Spanish

Category	Unit Value	# of Units	Total
Spanish Translations - assuming 5,000 words	\$0.25	5,000	\$1,250.00
Bilingual Notice Packet - assuming 20 images	\$4.00	915	\$3,660.00
Postage	\$0.72	915	\$658.80
NCOA/CASS/LACS	\$0.14	915	\$128.10
Undeliverable Processing and Skip Trace	\$0.32	92	\$29.44
Remail Notice (assuming 85% skip trace success)	\$5.00	78	\$391.00
Remail Postage	\$0.72	78	\$56.30
Mailing Supervisor	\$55.00	2	\$110.00
Total:			\$6,283.64

Contact Center

- Establish case-specific toll-free number and 24/7 IVR
- Assuming 4-minute calls

Category	Unit Value	# of Units	Total
Call Center Set Up	\$350.00	1	\$350.00
Toll Free Monthly Maintenance	\$95.00	9 Months	\$855.00
IVR (includes toll-free number charges)	\$15.00	3	\$45.00
Subtotal			\$1,250.00

Administration

- Process incoming class and counsel communications, opt-outs, disputes, and objections

Category	Unit Value	# of Units	Total
Database Manager	\$125.00	2	\$250.00
Project Manager	\$110.00	3	\$330.00
Dispute Processing	\$1.75	46	\$80.06
Opt-out Processing	\$1.75	10	\$17.50
Reporting to Counsel (hours)	\$100.00	8	\$800.00
Total:			\$1,477.56

Award Disbursement

- Establish 26 CFR § 1.468B-1 compliant Qualified Settlement Fund ("QSF")
- Disburse award payments and tax documents
- Uncashed funds will be sent to the California Controller's Unclaimed Property Fund
- Conduct regular and annual IRS-mandated QSF reporting and reconciliation (one per calendar year)
- Complete all required filings with state and federal tax authorities

Category	Unit Value	# of Units	Total
Disbursement Data Preparation	\$125.00	3	\$375.00
Disbursement Manager - Data Validation	\$90.00	2	\$180.00
Setup Banking Account/QSF	\$675.00	1	\$675.00
QSF Monthly Reconciliation and Maintenance	\$125.00	9	\$1,125.00
Print & Mail Distribution Check and Tax Docs	\$0.60	915	\$549.00
Postage	\$0.72	915	\$658.80
Process Returned Checks (assuming 5%)	\$0.20	46	\$9.20
Skip Trace Search Undeliverable Checks	\$0.12	46	\$5.52
Remail Checks (includes postage)	\$1.70	46	\$78.20
Escheat Uncashed Checks	\$500.00	1	\$500.00
QSF Reporting and Final Declaration	\$500.00	1	\$500.00
QSF Annual Tax Reporting and Reconciliation	\$850.00	1	\$850.00
Distribution Manager	\$90.00	2	\$180.00
Total:			\$5,685.72

Case Completion

- Final audit and review
- Send final declaration and reporting to counsel

Category	Unit Value	# of Units	Total
Data Manager-Final Reporting	\$125.00	2	\$250.00
Clerical-Clean Up Any Misc.	\$45.00	2	\$90.00
Project Manager-Wrap-up Final Issues	\$110.00	2	\$220.00
Total:			\$560.00

Total Estimated Cost of Administration:	\$17,112
Less Client Courtesy Discount:	-\$2,000
Discounted Total:	\$15,112
Not-To-Exceed Total:	\$17,500