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6 Attorneys for Plaintiff
NOEL LATORRE
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN MATEO
10

11 NOEL LATORRE, individually, and on behalf
of all aggrieved employees,

12 Plaintiff,

13 vs.

14 PATRIOT GROUP GLOBAL, INC., a New
15 Hampshire corporation, and DOES 1-25,
inclusive,

16 Defendant.
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Case No. 23-CIV-05561

**DECLARATION OF AMANDA MYETTE
IN SUPPORT OF PLAINTIFF'S
MOTION FOR SETTLEMENT
APPROVAL**

Assigned for All Purposes to
Judge: Jeffrey R. Finigan
Dept.: 24
Date: March 7, 2025
Time: 9:00 AM

Complaint Filed: November 21, 2023
Trial Date: None Set

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I, Amanda Myette, declare as follows:

1. I am a Senior Project Manager for Rust Consulting, Inc. (“Rust”). My business is 920 2nd Ave S, Suite 400, Minneapolis, MN 55402. My telephone number is (612) 222-2222. I am over twenty-one years of age and am authorized to make this declaration on behalf of Rust and myself.

2. Rust has extensive experience in PAGA and class action matters, having provided services in PAGA and class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance coverage, and consumer issues. We have provided notification and/or claims administration services in more than 7,500 projects. Of these, approximately 3,500 were Labor & Employment cases.

3. Rust's internal data security practices meet or exceed today's exacting industry standards. Our enterprise-class data security measures are founded on standard business practices including a vigorous employee screening program, ongoing employee security training, a hardened production data center hosted at a Tier 1 network carrier, all designed for ensuring data integrity and security.

4. Rust is being engaged by counsel of record to provide settlement administration services in the lawsuit entitled *Latorre v Patriot Group Global* (the “Settlement”). Duties will include: a) preparing, printing and mailing of notice and payment to Aggrieved Employees (the “Notice”); b) transmission of payments to the Labor & Workforce Development Agency, the State’s counsel and Plaintiff Noel Latorre, as authorized by the Court; (c) tax reporting as required by the State; and (d) such other tasks as the Parties mutually agree or the Court orders Rust to perform.

5. Rust will establish a mailing address to receive undeliverable Notices and other communications.

6. Rust will setup a phone number and will staff with live Customer Services representatives to be available for individuals to call with questions regarding the Settlement provide address updates. Spanish speakers will be available as needed.

1 7. Rust expects to receive text for the Notice from Counsel shortly after approval of
2 the Settlement is granted.

3 8. Rust expects that Counsel for Defendant will provide Rust with a mailing list (the
4 “List”) containing Aggrieved Employees’ names, last known addresses, Social Security
5 Numbers, respective pay periods, and any other pertinent information necessary to carry out
6 Rust’s duties.

7 9. Rust will mail the Notice prepared by the parties and approved by the Court.

8 10. The mailing addresses contained in the List will be processed and updated
9 utilizing the National Change of Address Database (“NCOA”) maintained by the U.S. Postal
10 Service. The NCOA contains requested changes of address filed with the U.S. Postal Service.
11 In the event that any individual has filed a U.S. Postal Service change of address request, the
12 address listed with the NCOA will be utilized in connection with the mailing of the Notice.

13 11. For any Notices that are returned to Rust as undeliverable, Rust will perform
14 address traces in an attempt to find an updated address. The address trace will utilize the
15 individual’s name, previous address and Social Security Number. In the event an updated
16 address is obtained, the Notice documents will be promptly re-mailed to those individuals via
17 First Class mail. For Notice documents that are returned by the Post Office with forwarding
18 addresses attached, these Notice documents will be promptly re-mailed to those individuals at the
19 forwarding address via First Class mail.

20 12. Rust will be responsible for calculating individual award amounts, printing and
21 mailing payments including tax documents, establishing a Qualified Settlement Fund (“QSF”),
22 setting up a bank account and preparing annual tax filings on behalf of the QSF.

23 13. Rust will establish and set up a QSF in this case, as it does in all cases that is
24 serves as the settlement administrator, based upon applicable laws and requirements.

25 14. Rust will be the fiduciary of the QSF and responsible for all payments and tax
26 reporting from the QSF. The QSF will obtain its own tax ID and report taxes under that tax ID.

27 15. Rust will provide Project Management and Technical Consulting staff to manage
28 all aspects of the administration and be available to Counsel.

16. Rust will post final judgment on its website.

17. The total cost for the administration of this Settlement is estimated to be \$6,949 unless the number of Aggrieved Employees (approx. 300) provided by counsel is materially different as that is the basis on which much of the estimate is provided. The costs are comprised of the combination of the transactional costs for print, postage, banking activities, etc., as well as the hourly fees to carry out the administrative duties.

18. Rust has been advised that the Court has ordered Rust to confirm the administration costs. Rust has learned that the Defendant is still gathering information in regards to the Aggrieved Employees, and that the number will not exceed 300. As such, the cost of the administration remains estimated at \$6,949.

19. None of the parties or attorneys in this matter have a relationship (financial or otherwise) with Rust.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct to the best of my knowledge and that this Declaration was executed this 16th day of October 2024, at Minneapolis, MN.

Amanda Myette
Amanda Myette

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I, the undersigned, am employed in the County of Orange, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 38 Corporate Park, Irvine, CA 92606-5105. My business e-mail address is mbennett@kringandchung.com.

SEE ATTACHED SERVICE LIST

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


MICHELLE BENNETT

NOEL LATORRE V. PATRIOT GLOBAL GROUP, INC.

K&C CLIENT: **Noel Latorre**
CLIENT NO.: **9300.0347**

SERVICE LIST

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