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Attorneys for ANDREE ALEMAN, on behalf of herself, all others similarly situated, and on behalf of the general public

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SAN DIEGO

ANDREE ALEMAN on behalf of herself, all others similarly situated, and on behalf of the general public, Plaintiffs, v. RETINA CONSULTANTS, SAN DIEGO, AN INCORPORATED MEDICAL GROUP; RCSD, INC.; and DOES 1-100, Defendants.	Case No. 25CU041637C [*Assigned for all purposes to the Honorable Gregory W. Pollack; Dept. C-71*] **DECLARATION OF MICHAEL BUI ON BEHALF OF SIMPLURIS, INC. REGARDING QUALIFICATIONS AND SETTLEMENT ADMINISTRATION** Date: December 18, 2026 Time: 9:30 a.m. Date Filed: August 8, 2025 Trial Date: None Set

DECLARATION OF MICHAEL BUI

I, Michael Bui, declare as follows:

1. I am employed as a Director of Client Services for Simpluris Inc. ("Simpluris"). I am over 18 years of age, and I am authorized to make this declaration on behalf of Simpluris and myself. This declaration is based on my knowledge.

2. Simpluris is prepared and fully capable of serving as the Administrator for this class settlement.

3. Simpluris has extensive experience in class action settlements, providing services in cases involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance, and consumer issues. Our expertise includes pre-settlement consultation, data management, legal notification, call center support, claims processing, and tax reporting.

4. Simpluris has delivered notification and/or claims administration services in more than 9,000 cases. Over the past 18 years, we have administered approximately $8 billion in settlements. A true and correct copy of Simpluris' company resume ("Simpluris Resume") is attached hereto as **Exhibit A**.

5. Simpluris is deeply committed to safeguarding the security of our data and information, as well as that of the Parties involved. To demonstrate this commitment, a true and correct copy of our SOC 2 Compliance certification is attached hereto as **Exhibit B**.

6. Simpluris maintains insurance coverage of $3,000,000 to protect against data breaches, defalcation of funds, or other instances of misfeasance.

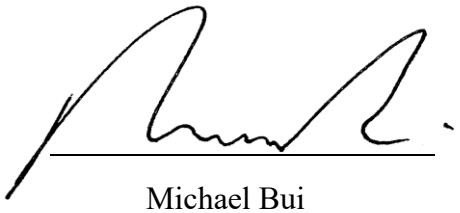
7. Simpluris has no conflicts of interest with any named parties.

8. Simpluris has never had any financial interest in, nor affiliation with, the parties or counsel in this matter. Furthermore, Simpluris has no actual or potential conflicts of interest with any Class Members.

9. In managing the notice of class settlement and the distribution of funds, Simpluris estimates the administrative costs to be $9,106. As a courtesy to the client, Simpluris is offering a discount of $1,000, reducing the expected administration cost to $8,106. This estimate is based

on a class size of approximately 120 members. If the scope of work increases or decreases significantly, Simpluris will inform the parties and request approval of an adjustment. A true and correct copy of Simpluris' bid for administering this matter, including a detailed, itemized breakdown of the tasks and the basis for the fee calculation, is attached hereto as **Exhibit C**.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed on November 18, 2026, in Costa Mesa, California.



Michael Bui

Exhibit A

Corporate Resume

Simpluris, an award winning claims administrator, has administered over 10,000 matters, managed over $10 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.

Mass Tort

Simpluris delivers secure, scalable, and compliant mass tort settlement administration, helping law firms and courts resolve complex matters efficiently and transparently. Mass tort administration demands precision, flexibility, data security, and trust. Our experienced team manages every phase of the settlement cycle, ensuring accurate outcomes while reducing risk and administrative burden.

Lien Resolution

Through Juraspring, which is a part of Point Wild's legal services group, we can offer settlement administration and mass tort lien resolution under one umbrella. We can now offer strategic consulting on mass tort and lien resolution matters; lien resolution compliance analysis, verification and resolution, and MMSEA coordination; and distribution solutions including award allocation, QSF coordination, and specialized considerations. From initial program architecture through final distribution, we bring decades of specialized expertise to every phase ensuring your cases move with precision and transparency.

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.

Legal Notification

Our in-house media team leverages over 15 years of experience developing custom campaigns that are precisely tailored to the needs of each class. We design, draft and distribute clear, accessible notices that claimants understand. Every campaign is backed by data and court accepted best practices. Our notice experts have provided both oral and written testimony on notice and claims in federal and state courts, at the trial court and appellate level.

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; 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

simpluris

Data Security and Technology

800-779-2104
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inquiries@simpluris.com | simpluris.com

Simpluris utilizes purpose-built proprietary software as well as industry best-of-breed technologies to administer complex matters with accuracy, efficiency, security, scalability, and cost-effectiveness. Our technology stack has been built from the ground up to meet the needs of complex matters including class action and mass arbitration settlements, government regulatory orders, corporate remediations and other mass legal administration engagements.

To fulfill the needs of these matters, Simpluris must be nimble while meeting rigorous security requirements and high-quality standards. Our in-house technologies are continuously refined, tuned, and improved throughout Simpluris' tenure.

Our technology team and entire business prioritize security as one of our major tenants to ensure our client's data remains secure and protected. To protect your data, Simpluris utilizes industry best practice tools and techniques including providing an encrypted secure file transfer (i.e. SFTP) platform for exchanging sensitive documents; encrypting all data at every level possible including encryption in transit, at rest, at hard-disk/block level, database level, and client/network layer; utilization of multi-factor authentication for all employee access; and extensive, ongoing required employee training to ensure our people understand the latest security threats & prevention techniques, and general best practices.

Data Security

Certifications and Attestations

Simpluris maintains a comprehensive information security program to ensure the highest level of care and concern is taken to protect our company and customers' information assets. Simpluris is annually audited by third-party providers for security policy and procedure review to ensure compliance with all necessary controls and requirements.

- SOC 1 Type 1
- SOC 2 Type 1
- SOC 2 Type 2
- FISMA
- HIPAA
- Penetration Testing
- Vulnerability Management
- NIST

Information Security Program

Simpluris maintains a written Information Security Program (ISP) designed to: (a) ensure the security, privacy and confidentiality of client and investor information; (b) protect against any reasonably anticipated threats or hazards to the security or integrity of client information; and (c) protect against unauthorized access to, use, deletion, or modification of investor information.

DATA SECURITY

Simpluris Information Security Policy Document Index

- Acceptable Use Policy
- Password Policy
- Patch Management / Update Policy
- Privacy Policy (Internal)
- Change Management Policy
- Data Retention Policy
- Software Development Lifecycle Policy
- HIPAA Security Rule
- Wireless Access Policy
- Mobile Device Policy
- Network Firewall Policy
- Antivirus and Malware Policy
- Physical Security Policy
- Business Continuity Plan
- Risk Assessment & Treatment
- Roles & Permissions Matrix
- HIPAA Oversight Policy
- System & Network Configuration Policy
- Internal Controls Policy
- Information Classification & Handling Policy
- Access Control Policy
- Audit Policy
- Backup Policy
- Removable Media Policy
- Disaster Recovery Policy
- HIPAA Assigned Responsibility
- Server Security Policy
- Incident Response Policy
- Vendor Management Policy
- Risk Management Policy

Systems, Processes & Tools

NETSPI™

Penetration testing

FORTINET

SIEM, firewall, VPN endpoint, data loss prevention, intrusion prevention

mimecast

Cloud email security service

SOPHOS INTERCEPT X

Endpoint security

Office 365

Cloud-hosted email & security

Microsoft Intune

Cloud-hosted endpoint management

Jira Software

Confluence

IT & development ticketing & documentation

nuspire

Vulnerability management

Microsoft Azure

Cloud-hosted identity management, storage solutions, MFA, endpoint management

aws

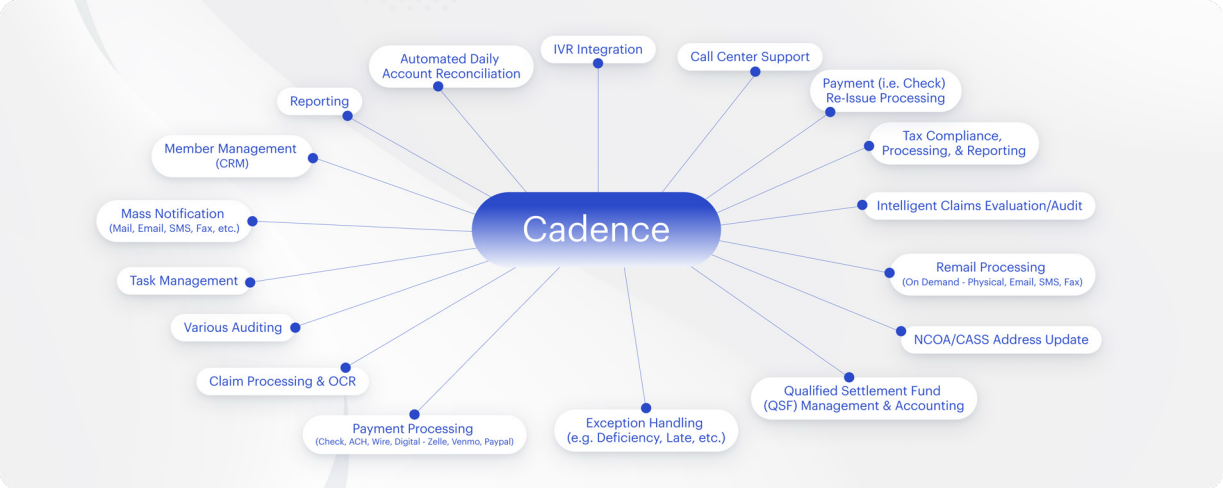
Amazon AWS (EC2, EBS, CloudWatch)
Cloud-hosted virtual servers, file storage, identity management, WAF, website hosting

DATA SECURITY

Our Technology Solutions

Cadence

Cadence™, our internally developed complex administration management tool, acts as a single centralized platform for the entire lifecycle of a project. Cadence uses security best practices including a role-based permission model, encryption at rest and in transit, and database and disk encryption. Our internal features include built-in integrated data and address augmentation (NCOA, CASS, Skip Tracing), address validation built-in, deep auditing and logging, maker/checker type validation steps and checkpoints to enforce accuracy and security, and prevent fraud and mistakes.



Case Website and Claims Portal

Cadence enables the development of claims processing websites specifically tailored for highly scalable and redundant situations using serverless, cloud-based technologies built on top of Amazon AWS. Features include login or authentication, multi-language support, milestones, document sharing, custom online claim forms, e-signature and more. Our case websites are ADA/Section 508 compliant while fully implementing security best practices. We perform encryption of all data, actively monitor and scan all incoming and outgoing data for threats both internal and external, as well as auditing and monitoring all systems for suspicious activity to ensure we are providing the highest possible protection and availability of data assets.

Malware, Fraud, & Data Protection:

Simpluris has built an extensive ecosystem using both custom in-house and off-the-shelf tools to protect our customers, class members, and business from the multitude of today's external security threats. Our highly scalable and redundant claims processing website platform has various malware and fraud prevention technologies integrated including duplicate detection and prevention, fraud prevention, and custom Real Time Claim Validation (RTCV) technology to filter prospective logins/claims based on customer-defined rules. This, in conjunction with our plethora of Gartner magic quadrant best-of-breed malware and ransomware prevention tools, ensures that data is protected whether it's processed through case websites, documents, emails, or any other transmission method. Our security specialists are trained and staffed to monitor our systems, applications, and networks 24/7 for any threats and are ready to respond at a moment's notice.

Our Team

Simpluris technology professionals include information technology administrators, security specialists, data analysts, database administrators, data engineers, developers, and web designers. They continually monitor and adapt our systems and processes according to business needs and ensure our systems are secure and stabilized against the ever-changing threat landscape, and remain current with the latest in industry best practices. In addition, we provide ongoing employee education and training to inform, test, and verify their knowledge of the latest security threats and mitigation strategies.

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- 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 Executive Team



Kevin Lee
Chief Executive Officer & President
klee@simpluris.com



Zach Hoffman
Co-Founder, Chief Technology Officer
zhoffman@simpluris.com



Doug Norman
Senior Vice President, Business Operations
dnorman@simpluris.com



Patrick Ivie
Chief Revenue Officer
pivie@simpluris.com



Francis Hawthorne
Senior Vice President, Client Services
francis.hawthorne@simpluris.com



Paul Saroj
Senior Vice President, Strategic Partnerships
psaroj@simpluris.com

simpluris

Let’s discuss how Simpluris can solve your administration challenges.

Our focus on providing superior customer service, coupled with our experience and ability to create innovative solutions, has given Simpluris a reputation for exceptional settlement administration.

Class Action Administration

Regulatory Remediation

Mass Arbitration Administration

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Exhibit C

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www.simpluris.com

Estimate Number:	20260526-PJI-01	Prepared By:	Patrick J. Ivie
Estimate Date:	5/26/2026	Telephone Number (mobile):	310.995.6455
Estimate Expiration Date:	8/24/2026	Email:	pivie@simpluris.com

Attorney Contact		Opposing Counsel Contact	
Attorney:	**Jill Vecchi, Esq.**	Attorney:	
Firm:	Mara Law Firm PC	Firm:	
Email:	jvecchi@maralawfirm.com	Email:	

Case Name: ***Aleman v. Retina Consultants Opt-Out 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:	120	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	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

- Static class website hosting notice, FAQ, and other class documents
- Data compilation: develop case-specific response tracking
- Maintain and monitor Email/Fax; Class Member may submit exclusion form via fax or mail

Category	Unit Value	# of Units	Total
Project Manager - Case Setup	$110.00	2	$220.00
Static Case Website	$450.00	1	$450.00
Website Monthly Maintenance	$90.00	9 Months	$810.00
Database Manager - Initial Data Analysis	$125.00	1	$125.00
Email and Fax Set up for Correspondence	$75.00	1	$75.00
		Total:	**$1,680.00**

Notice and Communications

- 10-page class Notice, sent by First Class US Mail, in English

Category	Unit Value	# of Units	Total
NCOA/CASS/LACS	$0.14	120	$16.80
Notice Packet - 10 images	$4.00	120	$480.00
Postage	$0.72	120	$86.40
Undeliverable Processing and Skip Trace	$0.32	12	$3.84
Remail Notice (assuming 85% skip trace success)	$5.00	10	$51.00
Remail Postage	$0.72	10	$7.34
Mailing Supervisor	$55.00	1	$55.00
		Total:	**$700.38**

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	1	$15.00
		Subtotal	**$1,220.00**

Confidential and Proprietary

Administration

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

Category	Unit Value	# of Units	Total
Database Manager	$125.00	1	$125.00
Project Manager	$110.00	2	$220.00
Opt-out Processing	$1.75	2	$3.50
Reporting to Counsel (hours)	$100.00	4	$400.00
		Total:	**$748.50**

Award Disbursement

- Establish 26 CFR § 1.468B-1 compliant Qualified Settlement Fund ("QSF")
- NCOA search done on all addresses prior to checks being mailed
- Disburse award payments and tax documents
- Check cashing reminder postcard sent 90 days after checks are issued to class members with uncashed checks
- Uncashed funds escheat to the State Controller 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	2	$250.00
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
NCOA/CASS/LACS	$0.14	120	$16.80
Print & Mail Distribution Check and Tax Docs	$0.60	120	$72.00
Postage	$0.72	120	$86.40
Process Returned Checks (assuming 5%)	$0.20	6	$1.20
Skip Trace Search Undeliverable Checks	$0.12	6	$0.72
Remail Checks (includes postage)	$1.70	6	$10.20
Check Cashing Reminder Notice:			
Single Postcard (to 70% of the class)	$0.18	84	$15.12
Postage	$0.59	84	$49.56
Mailing Supervisor	$55.00	1	$55.00
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	1	$90.00
		Total:	**$4,477.00**

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	1	$125.00
Clerical-Clean Up Any Misc.	$45.00	1	$45.00
Project Manager-Wrap-up Final Issues	$110.00	1	$110.00
		Total:	**$280.00**

Total Estimated Cost of Administration:	**$9,106**
Less Client Courtesy Discount:	**-$1,000**
Discounted Total:	**$8,106**

Confidential and Proprietary