

Miriam L. Schimmel (State Bar No. 185089)
mschimmel@blackstonepc.com
Joana Fang (State Bar No. 309623)
jfang@blackstonepc.com
Alexandra Rose (State Bar No. 329407)
arose@blackstonepc.com
Jared C. Osborne (State Bar No. 335968)
josborne@blackstonepc.com
BLACKSTONE LAW, APC
8383 Wilshire Boulevard, Suite 745
Beverly Hills, California 90211
Tel: (310) 622-4278 / Fax: (855) 786-6356

Attorneys for Plaintiff Quincy O’Neal

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

QUINCY O’NEAL, individually and on behalf of
others similarly situated and on behalf of other
aggrieved employees,

Plaintiff,

vs.

INCLUDED HEALTH, INC., FORMERLY
KNOWN AS GRAND ROUNDS, INC., a
Delaware corporation; and DOES 1 through 25,
inclusive,

Defendants.

Case No.: CGC-23-608391

Honorable Jeffrey S. Ross
Department 606

**DECLARATION OF JEFFREY D.
JOHNSON OF CAC SERVICES
GROUP, LLC, THE PROPOSED
SETTLEMENT ADMINISTRATOR**

Date: June 23, 2025
Time: 10:00 a.m.
Dept: 606

Complaint Filed: August 15, 2023
FAC Filed: January 2, 2024
Trial Date: Not Set

I, Jeffrey D. Johnson, declare as follows:

1. I am the Vice President of CAC Services Group, LLC (“CAC”), located at 6420 Flying Cloud Dr Ste 101, Eden Prairie, MN 55344. I am over twenty-one (21) years of age. The statements set forth in the declaration are made of my own personal knowledge and if called as a witness, I could and would testify competently to the matters stated below.

**DECLARATION OF JEFFREY D. JOHNSON OF CAC SERVICES GROUP, LLC,
THE PROPOSED SETTLEMENT ADMINISTRATOR**

2. CAC provides a comprehensive range of class and collective action claims administration services and has extensive experience in data processing and acting as third-party administrator in class and collective actions throughout the country.

3. CAC has been in business since May of 2003, and in this time, has administered over 500 class action lawsuits covering consumer products, employment, anti-trust and securities litigations. CAC has distributed over \$600 million in settlement funds to over 40 million claimants.

4. CAC's class and collective action administration services include: coordination of all notice requirements; design of direct-mail notice, publication of summary notice, emailing and texting notice packets and claim forms; coordination with the U.S. Postal Service; database management; website hosting and management; claims processing; fund management and distribution; and preparation of reports and declarations describing notice programs and claims processing.

5. CAC has previously served as the settlement administrator in numerous other matters that were similarly approved, including but not limited to:

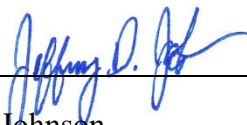
- *Adan Rosales Cegoviano v. Haven Management Services Inc.*, Case No. 37-2020-00028765-CU-OE-CTL
- *Angel Kyriakides; and Francisco Gastelum v. Cumming Chevrolet*, Case No. 37-2022-00045463-CU-OE-CTL
- *Edwin Rendon v. Moviso Academy*, Case No. 37-2022-00042482-CU-OE-CTL
- *Felecia Jolly v. Everest SDMV Management, LLC*, Case No. 37-2020-00029652-CU-OE-CTL
- *Jorge Tapia Arellano, et al. v. Southcoast Welding & Manufacturing, LLC*, Case No. 37-2019-00030405-CU-OE-CTL
- *Lance Hild v. Westside Building Material Corporation*, Case No. 37-2021-00041781-CU-OE-CTL
- *Marina Carneiro v. Late Mornings, Inc.*, Case No. 37-2019-00035596-CU-OE-CTL
- *Melissa Perry v. Orange County British Motorcars, LLC*, Case No. 30-2019-01111289-CU-OE-CXC
- *Packes v. School of Rock, LLC*, Case No. 30-2021-01217507-CU-OE-CXC

- *Steven Jezdimirovic v. Nuvia Water Technologies Inc.*, Case No. 37-2019-00039520-CU-OE-CTL

6. Given this experience, CAC is familiar with the matter at hand and is qualified to serve as the settlement administrator in this action.

7. Attached to this declaration is CAC's proposed fees and expenses (Exhibit 1).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 13th day of September, 2024.



Jeffrey D. Johnson

EXHIBIT 1:

- CAC's Proposed Fees and Expenses

PROPOSED FEES & EXPENSES

RE: O'Neal v. Included Health
 Proposal Dated: September 13, 2024
 CAC SERVICES GROUP - CONFIDENTIAL

Key Assumptions

Class Size - Class Members		100.00%	150	Persons
Notification				
Direct Mail	(% of Total Class)	100.00%	150	Pieces
Returned Mail Processing				
Returned for Non-Deliver (RFND)	(% of Total Class)	18.00%	27	Pieces
Address Change Post Office (ACPO)	(% of Total Class)	1.00%	2	Pieces
Address Change Correspondence (ACCO)	(% of Total Class)	1.00%	2	Pieces
Exclusion / Opt Out	(% of Total Class)	0.50%	1	Pieces
Claim Form Processing				
Claim Forms Received	(% of Total Class)	0.00%	0	Pieces
Distribution				
Payments	(% of Total Class - Opt Outs)	99.50%	149	Pieces

Program Requirements	Estimated Quantity	Units	Per Unit	Cost	Estimated Total
Program Set-Up & Reporting					\$ 1,000.00
Class Member Database	1	N/A	\$ 350.00	\$ 350.00	
Settlement Website	1	N/A	\$ 650.00	\$ 650.00	
Direct Mail Notification					\$ 675.00
NCOA / CASS / LACS Processing	1	N/A	\$ 150.00	\$ 150.00	
Notice Package	150	Pcs	\$ 3.500	\$ 525.00	
<i>The notice package includes the following:</i> ▶ 50# 8.5" x 11" Notice (6 pages) ▶ #10 Window Envelope ▶ 50# 8.5" x 11" Opt-Out Form (1 page)					
Returned Mail Processing					\$ 151.75
Notices Returned for Non-Delivery					
Process RFND Mail	27	Pcs	\$ 0.250	\$ 6.75	
Skip Trace RFND Mail	27	Pcs	\$ 0.750	\$ 20.25	
Re-print Notice Package	19	Pcs	\$ 5.250	\$ 99.75	
<i>Estimate: 70% of RFND is traceable</i>					
Notices returned as Address Change Post Office					
Process ACPO Mail	2	Pcs	\$ 0.500	\$ 1.00	
Re-print Notice Package	2	Pcs	\$ 5.250	\$ 10.50	
Address Change Correspondence					
Process ACPO Mail	2	Pcs	\$ 0.500	\$ 1.00	
Re-print Notice Package	2	Pcs	\$ 5.250	\$ 10.50	
Receive Request for Exclusion					
Process Request for Exclusion	1	Pcs	\$ 2.000	\$ 2.00	
Claims Processing					\$ -
Receive, Process and Validate Claim Forms	0	Pcs	\$ 1.250	\$ -	

Program Requirements	Estimated Quantity	Units	Per Unit	Cost	Estimated Total
Fund Distribution					\$ 765.00
Processing of Checks					
Print and Mail Payment	149	Pcs	\$ 3.500	\$ 521.50	
▶ 60# MOCR Bond 8.5" x 11" Check; Top Third Tear-Away					
▶ 50# 8.5" x 11" Form 1099 (1 page)					
▶ 50# 8.5" x 11" Form W2 (2 pages)					
▶ #10 Window Envelope - Security Tint					
Payment Reissue	5	Pcs	\$ 5.250	\$ 26.25	
<i>Estimate: 3% of check distribution</i>					
Check Clearing	149	Pcs	\$ 0.250	\$ 37.25	
Fund Management / Bank Fees	6	Months	\$ 30.000	\$ 180.00	
Tax Reporting					\$ 500.00
Annual Fee - Qualified Settlement Fund Taxes	1	Years	\$ 250.00	\$ 250.00	
<i>Federal & State Filings</i>					
Quarterly/Annual Taxes	1	Years	\$ 250.00	\$ 250.00	
<i>Tax Reporting</i>					
Postage¹⁾					\$ 225.63
Postage - Notice Package	150	Pcs	\$ 0.690	\$ 103.50	
Postage - Remails, Notice Package	23	Pcs	\$ 0.690	\$ 15.87	
Postage - BRM Claim Forms Received	0	Pcs	\$ 0.757	\$ -	
Postage - Check Distribution	149	Pcs	\$ 0.690	\$ 102.81	
Postage - Re-issue, Check Distribution	5	Pcs	\$ 0.690	\$ 3.45	
Postage will be invoiced at cost					
Program Management					\$ 2,050.00
Principal Consultant	1	Hours	\$ 150.00	\$ 150.00	
Project Manager	2	Hours	\$ 125.00	\$ 250.00	
Technical Consultant	6	Hours	\$ 135.00	\$ 810.00	
Support Staff	14	Hours	\$ 60.00	\$ 840.00	
Grand Total²⁾					\$ 5,367.38



Other Project-Related Costs	Units	Cost
FedEx / UPS Shipments	N/A	At Cost
Photocopies	Per Copy	\$ 0.15
Storage of 1.2 Cubic Foot Boxes	Box/Month	\$ 0.75
Removal and Secured Destruction of 1.2 Cubic Foot Boxes	Per Box	\$ 3.00
Project-Related Materials	N/A	At Cost
Other Case-Related Out-of-Pocket Expenses	N/A	At Cost

Other CAC Services ³⁾	Hourly Rate
Principal Consultant	\$ 150.00
Senior Consultant	\$ 140.00
Technical Consultant	\$ 135.00
Project Manager	\$ 125.00
Project Supervisor	\$ 80.00
Support Staff	\$ 60.00

Notes:

- 1) Postage is estimated and will be qualified for automation discounts.
- 2) The grand total reflects the estimated quantities of individual tasks performed. Should the actual quantities differ from the estimated quantities of tasks performed, the grand total (billable amount) will reflect such changes. Estimates were based on the assumptions listed above.
- 3) Fees for project-related services, other than what is covered elsewhere in this proposal, will be charged at CAC's standard hourly rate shown above. The above rates are effective as of September 2024. The rates are subject to possible revision on an annual basis, during the contract period, to allow for possible hourly rate changes.

