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Attorneys for Defendant NUWEST GROUP

HOLDINGS, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

ARACELI ALEXANDER in a Representative capacity only, and on behalf of other members of the general public similarly situated,

Plaintiff,

v.

NUWEST GROUP HOLDINGS, LLC, a Washington Limited Liability Company; and DOES 1-10, inclusive,

Defendants.

Case No. 37-2024-00001006-CU-OE-CTL

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

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

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

set forth in the declaration are made of my own personal knowledge.

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 was started in 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
- *Marcelino Ortuno v. Dunn-Edwards Corporation*, Case No. 37-2023-00046612-CU-OE-CTL

- *Marina Carneiro v. Late Mornings, Inc.*, Case No. 37-2019-00035596-CU-OE-CTL
- *Packes v. School of Rock, LLC*, Case No. 30-2021-01217507-CU-OE-CXC
- *Yaneth Guzman v. Hadley Date Gardens, Inc.*, Case No. CVPS2404374

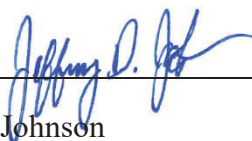
6. Given this experience, CAC is familiar with the matter at hand and is qualified to serve as the settlement administrator in this action.

7. CAC has operative procedures in place for protecting the security of Aggrieved Employee Data. Those procedures include, *inter alia*:

- a. CAC provides a secure link for uploading data to our server.
- b. Files uploaded are immediately encrypted with AES-256 encryption.
- c. Once files are loaded to the SQL Server database, the entire database is encrypted with Transparent Data Encryption (TDE).
- d. File and SQL Server backups are automated and performed daily.

8. Attached to this declaration is CAC's proposed fees and expenses (Exhibit 1). The fees and expenses are based in part on cost per piece per required task as well as an hourly rate component. The proposed fees and expenses for this settlement is \$6,325.71.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 30th day of January 2026.



Jeffrey D. Johnson

EXHIBIT 1:

- CAC's Proposed Fees and Expenses

PROPOSED FEES & EXPENSES

RE: Alexander v. NuWest Group Holdings
 Proposal Dated: January 8, 2026
 CAC SERVICES GROUP - CONFIDENTIAL

Key Assumptions					
Class Size - Class Members				835	Persons
Settlement Checks & Notice					
Direct Mail	(% of Total Class)	100%		835	Pieces
Returned Mail Processing					
Returned for Non-Delivery (RFND)	(% of Total Class)	15.0%		125	Pieces
Address Change Post Office (ACPO)	(% of Total Class)	1.5%		13	Pieces
Program Requirements	Estimated Quantity	Units	Per Unit	Cost	Estimated Total
Program Set-Up & Reporting					\$ 250.00
Class Member Database	1	N/A	\$ 250.00	\$ 250.00	
Direct Mail Notification					\$ 2,029.90
NCOA / CASS / LACS Processing	1	N/A	\$ 150.00	\$ 150.00	
Letter & Check	835	Pcs	\$ 2.200	\$ 1,837.00	
The notice package includes the following:					
▶ 45# 8.5" x 11" Notice - English (1 page)		▶ 45# 8.5" x 11" Form 1099 (1 page)			
▶ 60# MOCR Bond 8.5" x 11" Check; Top Third Tear-Away		▶ #10 Window Envelope - Security Tint			
Re-issue Lost or Destroyed Checks	13	Pcs	\$ 3.300	\$ 42.90	
Returned Mail Processing					\$ 464.80
Notices Returned for Non-Delivery					
Process RFND Mail	125	Pcs	\$ 0.250	\$ 31.25	
Skip Trace RFND Mail	125	Pcs	\$ 0.750	\$ 93.75	
Re-print Check/Notice Package	88	Pcs	\$ 3.300	\$ 290.40	
Estimate: 70% of RFND is traceable					
Notices returned as Address Change Post Office					
Process ACPO Mail	13	Pcs	\$ 0.500	\$ 6.50	
Re-print Check/Notice Package	13	Pcs	\$ 3.300	\$ 42.90	
Fund Management					\$ 948.75
Check Clearing	835	Pcs	\$ 0.25	\$ 208.75	
Fund Management / Bank Fees	6	Months	\$ 40.00	\$ 240.00	
Annual Fee - Qualified Settlement Fund Taxes	1	Years	\$ 250.00	\$ 250.00	
Federal & State Filings					
Individual Income Tax Reporting	1	Years	\$ 250.00	\$ 250.00	
Quarterly & Yearly Filings					
Postage ¹⁾					\$ 702.26
Postage - Check/Notice Package	835	Pcs	\$ 0.740	\$ 617.90	
Postage - Remails, Check/Notice Package	114	Pcs	\$ 0.740	\$ 84.36	

Program Requirements	Estimated Quantity	Units	Per Unit	Cost	Estimated Total
Program Management					\$ 1,930.00
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	12	Hours	\$ 60.00	\$ 720.00	
Grand Total ²⁾					\$ 6,325.71



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	\$ 100.00
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 January 2026. The rates are subject to possible revision on an annual basis, during the contract period, to allow for possible hourly rate changes.

