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Attorneys for Plaintiff YANETH GUZMAN, in a Representative Capacity only, and on behalf of other members of the general public similarly situated

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF RIVERSIDE**

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

Plaintiff,

vs.

HADLEY DATE GARDENS, INC., a California Corporation; HADLEY, INC., a California Corporation; and DOES 1-10, inclusive,

Defendants.

Case No.: CVPS2404374

Assigned to the Hon. Harold W. Hopp

**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 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.

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.

1 CAC has distributed over \$600 million in settlement funds to over 40 million claimants.

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

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

- 9 • *Adan Rosales Cegoviano v. Haven Management Services Inc.*, Case No. 37-2020-
10 00028765-CU-OE-CTL
- 11 • *Angel Kyriakides; and Francisco Gastelum v. Cumming Chevrolet*, Case No. 37-2022-
12 00045463-CU-OE-CTL
- 13 • *Edwin Rendon v. Moviso Academy*, Case No. 37-2022-00042482-CU-OE-CTL
- 14 • *Felecia Jolly v. Everest SDMV Management, LLC*, Case No. 37-2020-00029652-CU-
15 OE-CTL
- 16 • *Jorge Tapia Arellano, et al. v. Southcoast Welding & Manufacturing, LLC*, Case No.
17 37-2019-00030405-CU-OE-CTL
- 18 • *Lance Hild v. Westside Building Material Corporation*, Case No. 37-2021-00041781-
19 CU-OE-CTL
- 20 • *Marina Carneiro v. Late Mornings, Inc.*, Case No. 37-2019-00035596-CU-OE-CTL
- 21 • *Melissa Perry v. Orange County British Motorcars, LLC*, Case No. 30-2019-
22 01111289-CU-OE-CXC
- 23 • *Packes v. School of Rock, LLC*, Case No. 30-2021-01217507-CU-OE-CXC
- 24 • *Steven Jezdimirovic v. Nuvia Water Technologies Inc.*, Case No. 37-2019-00039520-
25 CU-OE-CTL

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

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

1 and expenses are based in part on cost per piece per required task as well as an hourly rate component.
2 The cap for this settlement is \$3,137.70.

3
4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and correct. Executed this 9th day of May 2025.

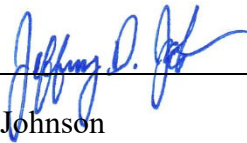
6
7 
8 _____
9 Jeffrey D. Johnson

EXHIBIT 1:

- CAC's Proposed Fees and Expenses

PROPOSED FEES & EXPENSES

RE: Guzman v. Hadley Date Gardens - PAGA
Proposal Dated: March 19, 2025
CAC SERVICES GROUP - CONFIDENTIAL

Key Assumptions

Class Size - Class Members				114	Persons
Settlement Checks & Notice					
Direct Mail	(% of Total Class)	100%	114	Pieces	
Returned Mail Processing					
Returned for Non-Delivery (RFND)	(% of Total Class)	15.0%	17	Pieces	
Address Change Post Office (ACPO)	(% of Total Class)	1.5%	2	Pieces	

Program Requirements	Estimated Quantity	Units	Per Unit	Cost	Estimated Total
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Program Set-Up & Reporting

Class Member Database	1	N/A	\$	350.00	\$	350.00
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Direct Mail Notification

NCOA / CASS / LACS Processing	1	N/A	\$	75.00	\$	75.00
Letter & Check	114	Pcs	\$	3.500	\$	399.00

The notice package includes the following:

- 45# 8.5" x 11" Notice - English (1 page)
►45# 8.5" x 11" Notice - Spanish (1 page)

► #10 Window Envelope - Security Tint

- 60# MOCR Bond 8.5" x 11" Check; Top Third Tear-Away

Re-issue Lost or Destroyed Checks	6	Pcs	\$	5.250	\$	31.50
Translate Notice to Spanish	575	Words	\$	0.35	\$	201.25

Returned Mail Processing

Notices Returned for Non-Delivery

Notices Returned for Non-Delivery

Process RFND Mail	17	Pcs	\$	0.250	\$	4.25
Skip Trace RFND Mail	17	Pcs	\$	0.900	\$	15.30
Re-print Check/Notice Package	13	Pcs	\$	5.250	\$	68.25

Estimate: 75% of RFND is traceable

Notices returned as Address Change Post Office

Process ACPO Mail	2	Pcs	\$	0.500	\$	1.00
Re-print Check/Notice Package	2	Pcs	\$	5.250	\$	10.50

Fund Management

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Check Clearing	114	Pcs	\$	0.25	\$	28.50
Fund Management / Bank Fees	6	Months	\$	40.00	\$	240.00
Annual Fee - Qualified Settlement Fund Taxes	1	Years	\$	200.00	\$	200.00
<i>Federal & State Filings</i>						
Individual Income Tax Reporting	1	Years	\$	200.00	\$	200.00
<i>Quarterly & Yearly Filings</i>						

Postage¹⁾

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Postage - Check/Notice Package	114	Pcs	\$	0.690	\$	78.66
Postage - Remails, Check/Notice Package	21	Pcs	\$	0.690	\$	14.49

Program Requirements	Estimated Quantity	Units	Per Unit	Cost	Estimated Total
Program Management					\$ 1,220.00
Principal Consultant	0.5	Hours	\$ 150.00	\$ 75.00	
Project Manager	1	Hours	\$ 125.00	\$ 125.00	
Technical Consultant	4	Hours	\$ 135.00	\$ 540.00	
Support Staff	8	Hours	\$ 60.00	\$ 480.00	
Grand Total ²⁾					\$ 3,137.70



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 March 2025. The rates are subject to possible revision on an annual basis, during the contract period, to allow for possible hourly rate changes.

