

1 **UNITED STATES DISTRICT COURT**
2 **NORTHERN DISTRICT OF CALIFORNIA**

3 In re VNGR Beverage, LLC Litigation
4

Case No. 4:24-cv-03229-HSG

5 This Document Relates To:
6 Case No. 4:24-cv-04396-HSG
7
8

**DECLARATION OF CHRISTIE K.
REED IN SUPPORT OF
SETTLEMENT NOTICE PLAN**

9
10 I, Christie K. Reed, declare as follows:

11 1. My name is Christie K. Reed. I have personal knowledge of the matters
12 set forth herein.

13 2. I am a Vice President of Legal Notification Services for Verita Global,
14 LLC (“Verita”) f/k/a KCC Class Action Services, LLC (“KCC”), a firm that provides
15 comprehensive class action services, including claims administration, legal
16 notification, email and postal mailing campaign implementation, website design, call
17 center support, class member data management, claims processing, check and
18 voucher disbursements, tax reporting, settlement fund escrow and reporting, and
19 other related services critical to the effective administration of class actions. Verita
20 has developed efficient, secure and cost-effective methods to properly handle the
21 voluminous data and mailings associated with the noticing, claims processing and
22 disbursement requirements of settlements to ensure the orderly and fair treatment of
23 class members and all parties in interest.

24 3. The purpose of this declaration is to provide information related to
25 Vertia’s qualifications and experience, as well as to detail the proposed notice plan
26 (the “Notice Plan”) designed to provide notice to class members for the class action
27 settlement in the above-captioned litigation. The facts in this Declaration are based
28

1 on my personal knowledge, as well as information provided to me by my colleagues
2 in the ordinary course of my business at Verita.

3 4. Unless noted otherwise, capitalized terms have the same meaning
4 ascribed to them as in the Settlement Agreement.

5 EXPERIENCE

6 5. As an industry leader, Verita has been retained to administer more than
7 10,000 class actions and distributed settlement payments totaling well over a trillion
8 dollars in assets. Our experience includes many of the largest and most complex
9 administrations of both private litigation and of actions brought by state and federal
10 government regulators. As such, we are familiar with, and guided by, Constitutional
11 due process provisions, the Federal Rules of Civil Procedure, and the relevant case
12 law relating to legal notification.

13 6. Verita has administered notice plans in a wide range of class actions in
14 the Northern District of California, for example: *Abante Rooter and Plumbing, Inc.*
15 *v. Alarm.com Inc.*, No. 4:15-cv-06314 11; *Aruliah v. Impax Laboratories, Inc.*, No.
16 3:14-cv-03673; *Banks v. Nissan North America, Inc.*, No. 4:11-cv-02022; *Barrett v.*
17 *Apple Inc.*, No. 5:20-cv-04812; *Bonoan v. Adobe, Inc.*, No. 3:19-cv-01068; *Camberis*
18 *v. Ocwen Loan Servicing, LLC*, No. 3:14-cv-02970; *Chen v. Chase Bank USA, N.A.*,
19 No. 3:19-cv-01082; *Chinitz v. Intero Real Estate Services*, No. 5:18-cv-05623;
20 *Cisneros v. American General Financial Services, Inc.*, No. 3:11-cv-02869; *Diaz v.*
21 *Google LLC*, No. 5:21-cv-03080; *Drieu v. Zoom Video Communications, Inc.*, No.
22 3:20-cv-02353; *Edwards v. National Milk Producers Federation*, No. 4:11-cv-
23 04766; *Ehret v. Uber Technologies, Inc.*, No. 3:14-cv-00113; *Heath v. Google LLC*,
24 No. 5:15-cv-01824; *Hickcox-Huffman v. US Airways, Inc.*, No. 5:10-cv-05193;
25 *Hendricks v. StarKist Co.*, No. 4:13-cv-00729; *Holman v. Experian Information*
26 *Solutions, Inc.*, No. 4:11-cv-00180; *Hubbard v. National Collegiate Athletic*
27 *Association*, No. 4:23-cv-01593; *In re Anthem, Inc. Data Breach Litig.*, No. 5:15-

md-02617; *In re California Gas Spot Market Antitrust Litig.*, No. 3:20-cv-03131; *In re Carrier IQ, Inc., Consumer Privacy Litig.*, No. 3:12-md-02330; *In re Cathode Ray Tube (CRT) Antitrust Litig.*, No. 4:07-cv-05944; *In re College Athlete NIL Litig.*, No. 4:20-cv-03919; *In re Extreme Networks, Inc. Securities Litig.*, No. 5:15-cv-04883; *In re Facebook Biometric Information Privacy Litig.*, No. 3:15-cv-03747; *In re HIV Antitrust Litig.*, No. 3:19-cv-02573; *In Re GEICO General Insurance Co.*, No. 4:19-cv-03768; *In re Lidoderm Antitrust Litig.*, No. 3:14-md-02521; *In Re LinkedIn User Privacy Litig.*, No. 5:12-cv-03088; *In Re Lithium Ion Batteries Indirect Antitrust Litig.*, No. 4:13-md-02420; *In Re: NCAA Athletic Grant-In-Aid Antitrust Litig.*, No. 4:14-md-02541; *In re Nexus 6P Products Liability Litig.*, No. 5:17-cv-02185; *In re: Nvidia GTX 970 Graphics Chip Litig.*, No. 4:15-cv-00760; *In Re Optical Disk Drive Antitrust Litig.*, No. 3:10-md-02143; *In re Telescopes Antitrust Litig.*, No. 5:20-cv-03639; *Johnson v. Triple Leaf Tea Inc.*, No. 3:14-cv-01570; *Knight v. Concentrix Corp.*, No. 4:18-cv-07101; *McArdle v AT&T Mobility LLC*, No. 4:09-cv-01117; *Mullins v. Premier Nutrition Corp.*, No. 3:13-cv-01271; *Nevarez v. Forty Niners Football Company, LLC*, No. 4:16-cv-07013; *Norris v. Mazzola*, No. 3:15-cv-04962; *Perks v. Activehours Inc.*, No. 5:19-cv-05543; *Perrine v. Sega of America, Inc.*, No. 3:13-cv-01962; *Schneider v. Chipotle Mexican Grill, Inc.*, No. 4:16-cv-02200; *Sheikh v. Tesla, Inc.*, No. 5:17-cv-02193; *Ragano v. Michaels Stores, Inc.*, No. 3:11-cv-03908; *Slovin v. Sunrun, Inc.*, No. 4:15-cv-05340; *Steinfeld v. Discover Financial Services*, No. 3:12-cv-01118; and *Weeks v. Google LLC*, No. 5:18-cv-00801.

7. Verita has also administered notice plans in a wide range of federal consumer class actions, including: *Cicciarella v. Califia Farms, LLC*, No. 7:19-cv-08785 (S.D.N.Y.); *Crane v. Sexy Hair Concepts, LLC*, No. 1:17-cv-10300 (D. Mass.); *Elkies v. Johnson & Johnson Services, Inc.*, No. 2:17-cv-07320 (C.D. Cal.); *Eubank v. Pella Corp.*, No. 1:06-cv-04481 (N.D. Ill.); *Flaum v. Doctor's Associates, Inc.*, No. 0:16-cv-61198 (S.D. Fla.); *Friend v. FGF Brands (USA), Inc.*, No. 1:18-cv-07644

(N.D. Ill.); *Habberfield v. Boohoo.com, USA, Inc.*, No. 2:22-cv-03899 (C.D. Cal.); *Lerma v. Schiff Nutrition International, Inc.*, No. 3:11-CV-01056 (S.D. Cal.); *In re Morning Song Bird Food Litig.*, No. 3:12-cv-01592 (S.D. Cal.); *In re Trader Joe's Tuna Litig.*, No. 2:16-cv-01371 (C.D. Cal.); *Khan v. BooHoo.com USA, Inc.*, No. 2:20-cv-03332 (C.D. Cal.); *McCrary v. The Elations Company, LLC*, No. 5:13-cv-00242 (C.D. Cal.); *Morrissey v. Tula Life, Inc.*, No. 2021L000646 (Cir. Ct. Ill.); *Poertner v. The Gillette Co. and The Procter & Gamble Co.*, No. 6:12-cv-00803 (M.D. Fla.); *Rikos v. The Procter & Gamble Co.*, No. 1:11-cv-00226 (S.D. Ohio); and *Suchanek v. Sturm Foods, Inc.*, No. 3:11-cv-00565 (S.D. Ill.).

8. Over the last two years, Verita has been appointed as the settlement administrator for cases where Co-Lead Interim Class Counsel, Bursor & Fisher, P.A. serves or served as class counsel; as the class notice administrator where Class Counsel Gutride Safier LLP serves as class counsel; and is currently proposed as the settlement administrator in a case where attorneys for Plaintiff Wheeler, Kaplan Fox & Kilsheimer LLP, serve as class counsel. Specifically, Verita served as the settlement administrator in each of the following cases where Bursor & Fisher, P.A. serves or served as class counsel: *Barbieri v Tailored Brands, Inc.*, Index No. 616696/2022 (Nassau Sup. Ct.), *Caser v. McLane Company, Inc.*, Index No. 616432/2022 (Nassau Sup. Ct.), *Sanger v. Harbor Freight Tools USA, Inc.*, Index No. 602922/2023 (Nassau Sup. Ct.), *Davis v. Urban Outfitters*, Index No. 612162/2022 (Nassau Sup. Ct.), *Akerley v. AmerisourceBergen Drug Co.*, Index No. 607347/2023 (Nassau Sup. Ct.), *Zaharia v. Icon Burger Acquisition LLC*, Index No. 607116/2023 (Nassau Sup. Ct.), *Day v. Tractor Supply Co.*, Index No. 612833/2023 (Nassau Sup. Ct.); is currently serving as the class notice administrator in *Swartz v. Dave's Killer Bread, Inc.*, No. 4:21-cv-10053 (N.D. Cal.) where Gutride Safier LLP serves as class counsel; and has been proposed as the settlement administrator in *In re Caustic Soda*

1 *Antitrust Litig.*, No. 1:19-cv-00385 (W.D.N.Y.)¹ where Wheeler, Kaplan Fox &
2 Kilsheimer LLP serves as class counsel. Verita has not served as the settlement
3 administrator on any cases with attorneys for Plaintiff Cobbs, Gucovschi
4 Rozenshteyn, PLLC.

5 9. If the Court grants Preliminary Approval of the settlement, and Verita is
6 appointed as the Settlement Administrator by the Court in this matter, Verita is
7 prepared to, capable of, and willing to implement the Notice Plan described below.

8 **NOTICE PLAN**

9 10. The proposed Notice Plan has been designed to reach approximately
10 70% of likely Class Members via a robust, state-of-the-art digital media campaign.

11 11. The expected reach of the Notice Plan is consistent with other effective
12 court-approved settlement notice programs and is designed to meet due process
13 requirements. The Federal Judicial Center’s (FJC’s) *Judges’ Class Action Notice and*
14 *Claims Process Checklist and Plain Language Guide* (the “FJC Checklist”)
15 considers 70% reach among class members to be a “high percentage” and reasonable.

16 ***Proposed Class Definition***

17 12. The Class is defined as: “[A]ll persons in the United States who,
18 between January 23, 2020 and the Settlement Notice Date, purchased in the United
19 States, for household use and not for resale or distribution, one or more of the
20 Products” which include “all flavors and package sizes of Poppi’s beverages sold
21 between January 23, 2020 and the Settlement Notice Date.”

22 13. The Class specifically excludes: (1) the Honorable Judge Haywood S.
23 Gilliam, Jr., the Honorable Maxine M. Chesney, Magistrate Judge Sallie Kim, the
24 Honorable Jay C. Gandhi (Ret.), and any member of their immediate families; (2) any
25

26 _____
27 ¹ As of March 13, 2025, preliminary approval was not yet granted.

1 government entity; (3) Poppi; and (4) any persons who timely opt-out of the
2 Settlement.

3 ***Direct Notice via Email Notice***

4 14. It is my understanding that Defendant's records include email addresses
5 for approximately 400,000 Class Members (the "Class List").

6 15. Verita will send a direct individual notice via email ("Email Notice") to
7 every Class Member for whom an email address exists on the Class List. Prior to
8 distributing the Email Notice, all email addresses on the Class List will be subject to
9 a cleansing and validation process to, among other things, remove extra spaces and
10 fix common domain name errors, as well as compare addresses against known bad
11 email addresses and verify email existence with Internet Service Providers (ISPs).

12 16. The Email Notice will be formatted to avoid common "red flags" that
13 could cause the email to be blocked by spam filters. For example, the content of the
14 notice will be included in the body of the email, rather than as an attachment, to avoid
15 spam filters and improve deliverability. The Email Notice will contain a link to the
16 Settlement Website.

17 17. The email delivery will be attempted three times to maximize the
18 probability that each Class Member on the Class List will receive it. The email
19 campaign will return data regarding the number of emails successfully delivered,
20 email open rates, and email bouncebacks.

21 ***Target Analysis***

22 18. To determine the appropriate target audience for a media campaign,
23 develop the notice campaign and to verify its effectiveness, Verita analyzed data from
24 2024 Comscore Multi-Platform/MRI-Simmons² syndicated data to profile the Class
25

26 ² MRI-Simmons USA ("MRI-Simmons") provides demographic, brand preference and media-use
27 (footnote continued)

1 and arrive at an appropriate target audience based on criteria pertinent to this
2 Settlement. Specifically, a research definition of all adults who have purchased
3 canned regular cola, diet cola, regular non-cola soft drinks, or diet non-cola soft drinks
4 and who also buy food labeled as probiotic³ (the “Target Audience”) was used to
5 profile likely Class Members.

6 19. It is important to note that the Target Audience is distinct from the class
7 definition, as is commonplace in class action notice plans. Utilizing a proxy audience
8 is considered to be a best practice among media planners and class action notice
9 experts alike. Using proxy audiences is also commonplace in both class action
10 litigation and advertising generally.⁴

11 20. Additionally, the Target Audience is based on objective syndicated data,
12 which is routinely used by advertising agencies and experts to understand the
13 demographics, shopping habits, and attitudes of the consumers they are seeking to
14 reach.⁵ Using this form of objective data allows the parties to report the reach and
15

16 habits, and captures in-depth information on consumer media choices, attitudes, and consumption
17 of products and services in more than six hundred product categories and over 6,500 brands.
18 comScore, Inc. (“Comscore”) is a leading cross-platform measurement and analytics company that
19 precisely measures audiences, brands, and consumer behavior, capturing 1.9 trillion global
20 interactions monthly. Comscore’s proprietary digital audience measurement methodology allows
21 marketers to calculate audience reach in a manner not affected by variables such as cookie deletion
22 and cookie blocking/rejection, allowing these audiences to be reached more effectively. Comscore
23 operates in more than seventy-five countries, including the United States, serving over 3,200 clients
24 worldwide.

25 ³ Food or beverages labeled as prebiotic are not measured by these sources. Probiotic was used as it
26 is the best proxy target available for this audience.

27 ⁴ If the total population base (or number of class members) is unknown, it is accepted advertising
28 and communication practice to use a proxy-media definition, which is based on accepted media
research tools and methods that will allow the notice expert to establish that number. The percentage
of the population reached by supporting media can then be established. Duke Law School,
GUIDELINES AND BEST PRACTICES IMPLEMENT 2018 AMENDMENTS TO RULE 23
CLASS ACTION SETTLEMENT NOTICE PROVISIONS, at 56.

⁵ The notice plan should include an analysis of the makeup of the class. The target audience should
be defined and quantified. This can be established through using a known group of customers, or it
(footnote continued)

1 frequency to the Court, with the confidence that the reach percentage and the number
2 of exposure opportunities complies with due process and exceeds the FJC's threshold
3 as to reasonableness in notification programs. Virtually all professional advertising
4 agencies and commercial media departments use objective syndicated data tools, like
5 the ones described above, to quantify net reach. Sources like these guarantee that
6 advertising placements can be measured against an objective basis and confirm that
7 reporting statistics are not overstated. They are ubiquitous tools in a media planner's
8 arsenal and are regularly accepted by courts in evaluating the efficacy of a media plan,
9 or its component parts.

10 21. To identify the best vehicles to deliver messaging to the Target
11 Audience, media quintiles and usage were reviewed. Here, the objective syndicated
12 data shows that members of the Target Audience are heavy internet users, with Target
13 Audience members being 29.6% more likely to be heavy users of the internet and
14 25.0% more likely to be heavy social media users, when compared to the general adult
15 population.

16 22. Given the strength of digital advertising, as well as our Target
17 Audience's heavy internet and social media use, we recommend supplementing the
18 direct notice effort with an eight-week internet advertising campaign to reach
19 unknown likely Class Members.

20 *Media Campaign*

21 23. In addition to the individual Email Notice described above, Verita will
22 implement a multifaceted media campaign. The media campaign will include digital
23 media, as well as newspaper publication as required to fulfill California's Consumers
24 Legal Remedies Act (CLRA) requirements. The digital notice efforts alone will reach

25
26
27 can be based on a proxy-media definition. Both methods have been accepted by the courts and, more
generally, by the advertising industry, to determine a population base. *Id* at 56.

1 over 70% of likely Class Members. This coverage will be further enhanced by the
2 Email Notice and Publication Notice.

3 24. Verita will implement a digital media campaign consisting of
4 approximately 29,415,000 impressions. An impression is a metric that counts the
5 number of times a user sees a website or other digital content, such as a digital
6 advertisement. The digital ads will be purchased programmatically⁶ and distributed
7 on various websites and mobile apps on one or more ad exchanges, as well via the
8 social media platforms Facebook⁷ and Instagram. Multiple targeting layers will be
9 implemented into the programmatic campaign to help ensure delivery to the most
10 appropriate users.

11 25. The notices will appear on both desktop and mobile devices, including
12 tablets and smartphones, in display and native ad formats. The text of these digital ads
13 will allow users to identify themselves as potential Class Members and will provide
14 a direct link to the case-specific Settlement Website for filing a Claim and more
15 information.

16 26. Verita's digital specialists will monitor the digital media campaign to
17 analyze key campaign performance indicators and make real-time modifications, as
18 needed.

19 27. To fulfill California's CLRA notice requirement, Verita will cause the
20 Publication Notice to be published four times as an approximate quarter-page ad unit,
21
22

23 ⁶ Programmatic Display Advertising is the leading method of buying digital advertisements in the
24 United States and a trusted method specifically utilized to reach defined target audiences. Over 90%
25 of digital display advertising is programmatic. In 2025, programmatic digital display ad spending is
26 expected to reach nearly \$180 billion. *See* <https://www.emarketer.com/content/programmatic-ad-spending-set-reach-nearly-180-billion-by-2025>.

27 ⁷ As of 2023, Facebook reported 246 million users in the United States and indicated that Facebook
28 accounts for almost half of all social media website visits. *See* <https://www.statista.com/topics/5323/facebook-usage-in-the-united-states/#topicOverview>.

1 once a week for four consecutive weeks, in the Los Angeles, San Francisco, and
2 Phoenix regional editions of *USA Today*.

3 28. The paper reaches 9,180 total print subscribers in California via the
4 selected regional placements.

5 ***Response Mechanisms***

6 29. Verita will establish and maintain a case-specific Settlement Website
7 (located at www.poppisettlement.com) to allow Class Members to obtain additional
8 information about the Settlement as well as relevant court filings from the
9 Consolidated Action. Class Members will be able to complete their claim forms online
10 or to print and mail their completed claims forms to Verita. Class Members will also
11 be able to view, download, and/or print the Website Notice approved by the Court, as
12 well as the Settlement Agreement, the Preliminary Approval Order, and any other
13 information agreed to by the Parties or required by the Settlement or the Court. Class
14 Members will also be able to review a list of frequently asked questions and answers,
15 and important dates and deadlines.

16 30. Verita will establish and host a case-specific toll-free number to allow
17 Class Members to listen to answers to frequently asked questions. The toll-free
18 number will also allow Class Members to request to have additional information
19 mailed to them.

20 31. Verita will establish a case-specific email address to allow Class
21 Members to correspond directly with Verita regarding the settlement.

22 **CLAIMS PROCESS**

23 32. Verita will process all Claim forms in accordance with the Settlement
24 Agreement and make payments based on Class Member selection via PayPal, Venmo,
25 Zelle, ACH transfer, or check.

26 33. After reviewing the claims rate in similar consumer class action
27 settlements Verita has administered, Verita has estimated approximately 2% to 5% of
28

1 the Class will file a claim. The claims rate could be more or less than estimated and
2 will ultimately be determined at the conclusion of the administration.

3 34. The following cases were used to estimate the claims rate for this
4 Settlement: *Barrett v. Apple Inc.*, No. 5:20-cv-04812 (N.D. Cal.); *Hickcox-Huffman*
5 *v. US Airways, Inc.*, No. 5:10-cv-05193 (N.D. Cal.); *Rael v. The Children's Place,*
6 *Inc.*, No. 3:16-cv-00370 (S.D. Cal.); *Elkies v. Johnson & Johnson Services, Inc.*, No.
7 2:17-cv-07320 (C.D. Cal.); *In re Morning Song Bird Food Litig.*, No. 3:12-cv-01592
8 (S.D. Cal.); *In re Trader Joe's Tuna Litig.*, No. 2:16-cv-01371 (C.D. Cal.); *Morrissey*
9 *v. Tula Life, Inc.*, No. 2021L000646 (Cir. Ct. Ill.); *Crane v. Sexy Hair Concepts, LLC,*
10 No. 1:17-cv-10300 (D. Mass.); *Cicciarella v. Califia Farms, LLC*, No. 7:19-cv-08785
11 (S.D.N.Y.); *Poertner v. The Gillette Co.*, No. 6:12-cv-00803 (M.D. Fla.); *Rikos v. The*
12 *Procter & Gamble Co.*, No. 1:11-cv-00226 (S.D. Ohio); and *Suchanek v. Sturm*
13 *Foods, Inc.*, No. 3:11-cv-00565 (S.D. Ill.).

14 **PROCEDURES FOR SECURELY HANDLING DATA**

15 35. Verita maintains a robust and comprehensive security program designed
16 to ensure the protection and secure handling of client and claimant data.

17 36. Verita's information security framework is aligned to ISO 27001 and
18 27002 which is reviewed on an annual basis and communicated to all employees
19 through a comprehensive training program.

20 37. Verita designed its in-house processing platform to securely safeguard
21 all transmitted information, as well as mitigate potential fraud. Verita implements
22 controls that ensure: (1) data transmission between Verita and its authorized
23 organizations are complete and secure; (2) new claims (participant data and noticing
24 materials) are established accurately and completely; (3) claims processing is
25 performed completely and accurately; (4) disbursements are authorized and
26 performed accurately and completely; (5) output is printed accurately (e.g., claim
27 forms, deficiency letters, etc.); (6) processing is appropriately authorized and

1 scheduled and that deviations from scheduled processing are identified and resolved;
2 (7) physical access to the computing resources on which data is stored is restricted to
3 properly authorized individuals; and (8) changes to the existing applications are
4 authorized, tested, approved, and properly implemented.

5 38. Verita acts as a data processor and will receive data transfers from Class
6 Counsel and/or Defendant through secure File Transfer Protocol (“FTP”). The FTP
7 File Gateway will have a User Login and Password for access. Once Verita receives
8 the files, the data will be reviewed for size and record count and removed from the
9 FTP File Gateway.

10 39. Due to the nature of the services Verita provides, data security is of the
11 utmost importance. As such, Verita continually makes sizeable investments designed
12 to protect information and IT assets. Verita has developed a comprehensive global
13 information and cybersecurity framework aligned to the National Institute of
14 Standards and Technology (NIST) frameworks, ISO 27001 and 27002. Among other
15 things, this framework and its underlying controls are designed to ensure that Verita’s
16 information and systems are only available to authorized individuals with a justified
17 business need, information is not disclosed or modified without authorization,
18 applicable regulatory, legislative and client requirements are met, and suspected
19 security weaknesses are reported, investigated, documented and resolved.

20 INSURANCE

21 40. Verita’s services agreement, as outlined in the Terms and Conditions
22 agreed upon by Verita and Interim Co-Lead Class Counsel, governs the terms and
23 conditions of Verita’s employment, including liability and acceptance of
24 responsibility. Verita accepts responsibility of the settlement administration as
25 outlined therein. Verita maintains insurance applicable to its services including
26 professional indemnity insurance, general liability, property, comprehensive crime,
27 electronic and computer crime, and cyber liability insurance.

FRAUD PREVENTION

41. Effective fraud prevention is an end-to-end process in today's class action administration. At the time of filing, Verita's settlement websites utilize industry standard services to prevent fraudulent claims from being filed including, but not limited to, a Web Application Firewall ("WAF") and reCAPTCHA services used to identify and potentially prevent fraudulent claims from being filed. However, in situations where there are unknown class members and the Know Your Customer ("KYC") protocols requiring proof of identity or purchase are limited, Verita's backend data analysis is essential to identifying and removing fraudulent claims. While sophisticated fraudulent filers may be able to circumnavigate the front-end protections on our settlement websites, they often struggle to complete claims forms in a unique way. This process includes a comprehensive review of the claim submissions, not just for validation of completion under the terms of the settlement, but analysis of how the claim form was submitted, comparing the answers submitted across the entire population to identify trends in responses to claim form questions and reviewing contact information for duplication in Names, Addresses, Emails, IP addresses, etc. Any claims suspected of fraud are reported to the parties to determine how they should be treated and eventually adjudicated.

CAFA NOTIFICATION

42. Within ten days of the filing of the Settlement Agreement with the Court, Verita will work with Defendant's counsel to cause notice to be disseminated to the appropriate state and federal officials pursuant to the requirements of the Class Action Fairness Act, 28 U.S.C. §1715 (CAFA).

NOTICE PLAN COSTS

43. Verita has estimated the costs of notice and settlement administration at \$271,403-\$357,725 depending on the claims rate and the primary method by which claims are filed. These costs are based upon the scope of work currently contemplated

Executed this 13th day of March 2025, at Lakewood, California.


Christie K. Reed