

1 available similar product) to identify potential updated mailing addresses.
2 Notices will be subsequently mailed to all updated addresses.

3 b) **E-mail Notice:** In instances where an email address is available in
4 Defendant's records (87.5% of the Settlement Class Members), the
5 Mailed Notice in this matter will be supplemented by e-mailed Notice. In
6 instances where Settlement Class Members do not respond to the initial
7 Mailed or E-Mailed Notice, they will be sent a second E-Mail Notice
8 prior to the expiration of key deadlines.


9 4. Based upon my experience, given: (a) Defendant's representations that it has
10 last known mailing addresses and phone numbers for all Settlement Class Members; (b)
11 Defendant has email addresses for 87.5% of Settlement Class Members; (c) the class
12 period at issue (2014–2019); (d) the use of the National Change of Address Database to
13 update addresses prior to mailing; and (e) the use of commercial resources (including
14 outbound calling campaigns if necessary) to identify mailing addresses for Settlement
15 Class Members for whom addresses are still undeliverable, it is my expectation that either
16 Direct Mail Notice, E-mail Notice, and in many cases both forms of notice, will reach
17 almost all Settlement Class Members in this matter.

18 **COST OF ADMINISTRATION**

19 5. At the direction of Class Counsel, we have prepared an estimate of the
20 projected fees and costs that are likely to be incurred in the administration of the proposed
21 settlement. We based this estimate on Defendant's representation that mailing addresses
22 and email addresses will be made available for the 16,439 Settlement Class Members and
23 that each of those Class Members will be sent both a Direct Mail and E-mail notice (if an
24 email address is available). Analytics has committed that professional fees and third-party
25 costs through distribution will not exceed \$45,000 (and expect that they will likely be less
26 than this amount).

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Dated: September 20, 2019



Richard W. Simmons

President

Analytics Consulting