

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

J THOMPSON, et al., Individually and on Behalf of All Others Similarly Situated,	)	No. 2:16-cv-01183
	)	<u>CLASS ACTION</u>
Plaintiffs,	)	Honorable Judge Tena Campbell
vs.	)	Honorable Magistrate Judge Dustin B. Pead
1-800 CONTACTS, INC., et al.,	)	DECLARATION OF JULIE N. GREEN ON
Defendants.	)	BEHALF OF CPT GROUP, INC. IN
	)	SUPPORT OF MOTION FOR ORDER
	)	APPROVING NOTICE TO THE
	)	SETTLEMENT CLASSES AND
	)	PROPOSED PLAN OF DISTRIBUTION

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I, Julie N. Green, declare and state as follows:

1. I am the Senior Vice President of Operations, Class Action Services of CPT Group, Inc. (“Settlement Administrator” or “CPT”). The following statements are based on my personal knowledge, information provided to me by counsel for Plaintiffs and by other CPT employees working on this matter, and records of CPT generated and maintained in the usual course of its business. If called on to do so, I could and would testify competently thereto.

2. For this matter, CPT is able and willing to provide Notice and Claims Administration services as set forth in Plaintiffs’ Motion for Order Approving Notice To Settlement Class and Plan of Distribution, if the Motion is approved by the Court.

3. I have been employed by CPT for 15 years, managing the operations department and supervising multiple notice and claims administration programs. As Senior Vice President of Operations, I am responsible for the oversight, supervision and evaluation of all departments and positions related to the administration of class action matters to ensure superior quality and successful execution of each component required to complete the settlement process. In my career at CPT, I have been responsible for the design and/or implementation of hundreds of class action administration plans. I submit this declaration at the request of Plaintiffs’ Counsel in support of their Motion for Order Approving Notice to the Settlement Classes and Proposed Plan of Distribution.

**CPT'S EXPERIENCE RELEVANT TO THIS CASE**

4. CPT Group, Inc. is located at 50 Corporate Park, Irvine, CA 92606. CPT is a leader in the settlement administration industry and has extensive experience in providing court approved notice of class actions and administering various types of notice programs and settlements. In the past 30-plus years, CPT has provided notification and/or claims administration services in thousands of class action cases. Throughout our history, CPT has disbursed billions of dollars in settlement funds, and serviced over 65,000,000 class members. CPT offers a wide range of class action administrative services for developing, managing and executing all stages of integrated settlement plans. A true and correct copy of CPT's company resume ("CPT CV") is attached as **Exhibit A**, which provides detailed information concerning our class action settlement and claims administration qualifications and experience.

5. As a class action settlement claims administrator, CPT has regularly been approved by both federal and state courts throughout the United States to provide notice of settlement and claim processing services, including in actions involving consumer classes. In this capacity, CPT handles all services related to the implementation of class action settlements including (a) providing all types of legal notice, such as direct mail, email notification, and publication programs, including through digital and social media platforms; (b) establishing dedicated URLs and case websites with on-line claim filing capabilities; (c) providing call center support with a dedicated toll-free interactive voice response (IVR) telephone number; (d) providing electronic and hard copy claims processing; (e) receiving/processing other communications about the settlement; (f) providing secure data management and reporting; (g) handling paper and electronic payment distribution through check, gift card, merchandise credits, direct deposit and other means; (h) providing Qualified Settlement Fund reporting and banking services; (i) filing applicable tax returns; (j) filing any required reports with the court; and (k) handling other tasks related to the administration of class action settlements that may be requested by the parties or court. CPT has been entrusted by counsel and appointed by courts to handle complex nationwide and statewide class action settlements. Some of our recent multi-state representative matters include: *Broomfield v. Craft Brew Alliance, Inc.*, (N.D. Cal) Case No. 5:17-cv-01027-BLF; *Jacobo, et al., v. Ross Stores, Inc.*, (C.D. Cal.) Case No. 17-56241, D.C. No. 2:15-cv-04701-MWF-AGRx; *Bokelman v. FCH Enterprises, Inc.*, (D. Haw), Case No. 18-cv-00209-RJB-RLP; *Hartranft, et al. v. TVI, Inc. d/b/a/ Savers, Inc., Apogee Retail, LLC*, Case No. 8:15-cv-01081 CJC-DFM (C.D. Cal.); *Lim, et al. v. Vendini, Inc.*, Santa Clara County Superior Court Case No. 1-14-CV-259897; *Manouchehri*

*v Styles For Less, Inc.*, (S.D. Cal.) Case No. 14cv2521 NLS; *Kerr, et al. v. Zacks Investment Research, Inc.*, et al., (S.D. Cal.) Case No. 16-CV-01352 GPC BLM; *Hinshaw v. Vizio, Inc.*, (C.D. Cal.) Case No. SA CV14-00876-DOC (ANx); *Hightower, et al. v. JPMorgan Chase Bank, N.A.*, (C.D. Cal.) Case No. 11-CV-01802-PSG-PLAx; *Romero, et al. v. Loacker USA, Inc.*, Santa Clara County Superior Court Case No. 1-14-CV-274434; *Hoover v. Hi-Tech Pharmacal Co., Inc.*, (C.D. Cal.) Case No. EDCV 13-00097 JGB (OPx); and *Michigan Finance Authority, et al. v. Kiebler, et al.*, Michigan Court of Claims Case No. 13-000166-MZ. Some of our recent single-state representative matters include: *Krinsk, et al. v. Monster Beverage Corporation, et al.*, San Diego Superior Court, Case No. 37-2014-00020192-CU-BT-CTL; *Mount v. Wells Fargo Bank*, Los Angeles County Court of California Case No. BC395959; and *Kerr v. The New York Times Co.*, et al., San Diego Superior Court Case No. 37-2016-000010125-CU-MC-CTL.

### **CASE BACKGROUND**

6. CPT understands these are proposed nationwide class action settlements to resolve claims against National Vision, Inc. and Arlington Contact Lens Service, Inc. (“AC Lens/NVI”), Luxottica of America Inc. (f/k/a Luxottica Retail North America Inc.) (“Luxottica”), Vision Direct, Inc. (“Vision Direct”), Walgreens Boots Alliance, Inc. and Walgreen Co. (“Walgreens,” collectively with “Vision Direct” referred to as “WAG/VD”), and 1-800 Contacts, Inc., alleging that the Defendants engaged in anticompetitive acts that improperly inflated the price for the online retail sale of contact lenses in violation of Section 1 of the Sherman Act, 15 U.S.C. §1, and that the Settlement Classes include persons who do not timely exclude himself, herself, or themselves and who made at least one online purchase of contact lenses from 1-800 from January 1, 2004 to September 12, 2019 or any of the following entities during the specified time period: (i) Vision Direct, Inc. (“Vision Direct”), Walgreens Boots Alliance, Inc., Walgreen Co. (“Walgreens,” collectively with Vision Direct referred to as “WAG/VD”) from January 1, 2004 to September 12, 2019; (ii) Arlington Contact Lens Service, Inc. or National Vision Inc. (collectively, “AC Lens/NVI”) from March 10, 2010 to September 19, 2017; or (iii) Luxottica of America, Inc. (f/k/a Luxottica Retail North America, Inc.) (“Luxottica”) from December 23, 2013 to July 5, 2019. Excluded from the Settlement Class are Defendants, their parent companies, subsidiaries and affiliates, any alleged Agreement Counterparties, governmental entities and instrumentalities of government, states and their subdivisions, agencies and instrumentalities.

7. CPT understands that eligible members of the Settlement Classes may receive a payment from the settlements for each Allowed Claim. The amount of each payment will be determined by the Plan of Distribution that the Court approves and will be based on a *pro rata* share of the Net Settlement Fund.

8. The objective of the following Notice Plan is to provide adequate notice of the Settlements to potential members of the Settlement Classes as defined above in paragraph 6. CPT has been informed by counsel for plaintiffs that email addresses are available for the vast majority of the class members. Additionally, it is our understanding and experience in similar matters involving online purchasers that online purchasers are frequent internet users; therefore, email will be an effective and cost-efficient method of notification for members of these classes. Further, to account for class members who cannot be reached through email, CPT is tasked to target such class members through alternative methods of notice.

#### **IDENTIFICATION OF CLASS MEMBERS AND TARGET AUDIENCE**

9. Based on plaintiffs' review of defendants' transactional sales data, plaintiffs' counsel preliminarily estimates the classes to include as many as 10,000,000 individuals, some of whom might have purchased contacts from more than one defendant.

10. To determine how to best reach class members for whom plaintiffs do not have email addresses or working email addresses through a supplemental notice program, CPT Group utilized the GfK MediaMark Research & Intelligence, LLC (MRI)<sup>1</sup> data. The data CPT gathered was based on a study released in Fall 2019 of adults 18+ within the United States who identify with the MRI Cross Tab statement "Eyeglasses, Contact Lenses & Sunglasses-Where Bought:

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<sup>1</sup> CPT frequently uses and relies on GfK MRI data and, based on our experience and GfK MRI's reputation in the industry, CPT considers it a reliable source. GfK MRI describes its data as follows: "MRI's Survey of the American Consumer® is the largest and most authoritative study of adult consumers in the United States. No other organization, not even the U.S. Census Bureau, can tell you more about Americans as consumers. All information collected in the Survey comes from a single set of respondents, ensuring data integrity and reliability. MRI interviews approximately 24,000 consumers every year in towns, cities, and counties across the contiguous 48 states. Crucial to the Survey's success is the relationship MRI develops with respondents. Interviews are conducted in consumers' homes, face-to-face, and followed up with a comprehensive self-administered survey. In a national probability study such as the Survey of the American Consumer, the higher the response rate, the more reliable the data. MRI's highly trained interviewers consistently generate the highest response rates in the industry". (GfK US MRI, LLC. D/B/A MRI-Simmons, 2019, p.1/para.1)

Internet/Online.” Gfk MediaMark Research & Intelligence study concluded that the potential nationwide target audience is 9,785,000, which is consistent with plaintiffs’ estimate, based on transactional data from defendants, on the number of Class Members.

11. Utilizing syndicated data, like the data from MRI, aids CPT in understanding the socio-economic characteristics, interests and practices of a target group, which in turn guides the proper selection of media to reach that target audience. To identify the best media outlets to deliver messages to the target audience, CPT reviewed media quintiles that measure the degree to which a particular audience uses media relative to the general population. CPT concluded that the target audience for this case is more likely than the general population to be frequent internet users. Given the weight of internet use, digital advertising will be the most cost-effective method, in addition to direct email notice, to notify potential Class Members of their rights and options in this Settlement.

#### **NOTICE PLAN**

12. The proposed notification plan therefore includes the following components:

13. **Direct E-Mail Notice:** CPT will disseminate by email the Short Form Notice to all potential members of the proposed settlement classes who are identified in defendants’ transactional records as members of one or more of the four classes and for whom the transactional data includes an email address. Upon receipt of the data, CPT will scrub the records to create a useable format, to reduce duplicate records and to increase the success rate of deliverability of the Class Notice. Settlement Class Members will be assigned a unique identifier that will be used throughout the duration of the administration process.

14. In developing this plan, CPT and Co-Lead Class Counsel also investigated use of direct mail notice to settlement class members via U.S. mail in lieu of direct e-mail notice. Based on the estimate of the number of members of the four classes, however, it would cost approximately \$3.14 million dollars to provide direct U.S. mail notice to settlement class members via postcard. Printing and mailing a long-form notice would be even more expensive. As explained herein, providing direct notice via e-mail is estimated to cost only several hundred thousand dollars, and thus result in significant savings to the class, while maintaining a similar reach rate.

15. **Publication/Internet Notification:** CPT and its strategic partner, Élan Legal Media<sup>2</sup> will implement programmatic digital banner advertising campaigns on the Google Display Network (accessible via desktop and Mobile devices), Bing, and the General Programmatic Ad Exchange, and also use Search/Keyword Targeting. Additional layers of reach will be conducted through social media networks like Facebook and Instagram, along with placement of advertisements on OLV (YouTube) and OLR (Pandora) platforms. The notice plan specifically targets the online purchaser through multiple methods including Shopper Data Targeting, Demographic Targeting and Interest/Contextual Targeting. This meets the media consumption profile of the target audience across social media and both desktop and mobile web properties. PR and word-of-mouth initiatives will further augment the notice plan through placement of media in native environments such as blogs. These media platforms have been identified as the best resources to reach the prospective targeted audience and the most cost-effective solution. According to the Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide, "a reasonable reach is between 70-95% with a median reach on approved notice plans at 87%." CPT's goal, with Counsel's guidance, is, apart from the direct email campaign, to reach approximately 75% of the Target Audience via a combined effort of all media platforms stated above. The notice plan is also projected to reach this specific audience at a frequency of 3-3.5X, over 70 days.

16. **Press Release:** To assist with the digital notification efforts, CPT will publish a one-time nationwide press release on the PR Newswire. The press release will be based on the Court-approved language in the Long Form Notice and finalized in consultation with plaintiffs' counsel, and deliver a clear, concise message to the intended target audience. The press release should draw media attention and gain free publicity as the release will contain sufficient information for any interested news organization or author to write a news story. Press releases are a useful tool when utilizing online noticing methods because they help "spread the word" faster and to a broader audience at a lower cost than placing banner ad impressions.

17. **Website:** CPT will maintain and administer a dedicated settlement website with a case specific Domain/URL ([www.onlinecontactlenssettlement.com](http://www.onlinecontactlenssettlement.com)) that will be informative and easy for potential members of the Settlement Classes to navigate. The website will be optimized

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<sup>2</sup> Élan Legal Media is a leading digital notification firm, with over 8 years of digital notification experience bringing the most advanced advertising research and technologies to the legal space. [www.elanlegalmedia.com/](http://www.elanlegalmedia.com/)

for mobile users and maximize search engine optimization through key words and metadata to increase search engine rankings. The Settlement Website will include links to the Settlement Agreements, Preliminary Approval Order, Long Form Class Notice, Claim Form, “FAQs”, and other relevant filings and orders as instructed by the Plaintiffs’ Counsel or the Court. In addition, the website will provide the information necessary to file a claim. The website address or a hyperlink will also be displayed on all notifications described above.

18. **Toll-Free Number/Live Class Member Support:** CPT will establish a dedicated 24-hour, toll-free support line with Interactive Voice Response (“IVR”) capabilities to provide potential members of the Settlement Classes with (a) general and detailed information about the Action and Settlement; (b) answers to frequently asked questions ; and (c) information relating to filing a claim, objecting to the Settlements, and opting out, including deadlines relating to the Settlements. For additional support, class members will be able to reach a live call center representative during normal business hours (Mon-Fri. from 9:00am – 5:30pm PST) or leave a message and a live call center representative will return their call during same normal business hours.

19. **Case Email Address:** Class Members also will be able to request a copy of the Notice and/or relevant case filings, or send an email with questions to the dedicated case email address.

20. In summary, the proposed notice plan is designed to reach approximately 75% of the target audience (i.e., the Settlement Classes) nationwide through an internet banner advertisement campaign and social media advertisements, supplemented by a nationwide press release, settlement website, and call center, in addition to direct notice by email to the vast majority of the class. Based on the information provided by plaintiffs’ counsel and the terms of the parties’ Settlement Agreements, CPT believes this notice program will provide reasonable, fair and adequate notice, and constitutes the best notification plan under the circumstances, especially given the enormous cost of providing notice via U.S. mail to so many potential Class Members, a cost which would significantly reduce the funds available for distribution to Class Members. Potential Settlement Class Members will be reached through a combination of direct email notice and through various, targeted online methods. It is CPT’s experience that the notification plan as outlined within this declaration is consistent with other class action notice plans that have been approved by both state and federal courts nationwide, including: *Jacobo, et al., v. Ross Stores, Inc.*, (C.D. Cal.) Case No. 17-56241, D.C. No. 2:15-cv-04701-MWF-AGRx; *Bokelman v. FCH Enterprises, Inc.*, (D.



Haw), Case No. 18-cv-00209-RJB-RLP; and *Krinsk, et al. v Monster Beverage Corporation, et al.*, San Diego Superior Court, Case No. 37-2014-00020192-CU-BT-CTL.

### **NOTIFICATION TIMELINE**

21. Providing CPT has adequate time in advance of the notice date to receive and properly scrub and analyze the class list, CPT proposes to implement the Notice Plan as set forth in the timeline below:

<b>Item Description</b>	<b>Date</b>
Commencement of Digital Advertising Campaign and Email Notification	No later than 35 days after Order granting approval of proposed notice plan
Establishment of Settlement Website and Live IVR/Toll-Free Number	No later than 3 business days prior to commencement of notice
Digital Advertising Campaign continues	For 10 continuous weeks following commencement of ad campaign

### **CLAIMS PROCESS**

22. Pursuant to the proposed Plan of Distribution, Claim Forms may be submitted electronically (i.e. through the settlement website) at [www.onlinecontactlenssettlement.com](http://www.onlinecontactlenssettlement.com). The Claim Form will allow Settlement Class Members to report the total dollar amount in contact lenses they purchased online during the settlement class period from each defendant/company.

23. As part of the claim validation process, CPT will review all Claim Forms submitted by Settlement Class Members for timeliness and completeness. Claim Forms that are submitted timely and complete and pass the validation process will be considered Qualified Claims, and ultimately if approved for payment, will be considered Allowed Claims. Following submission of the Claim Form, CPT may require a claimant to submit documentation and other materials to support the claim, including, for example, by providing purchase histories and order confirmations.

24. Claim Forms that do not meet the submission requirements (e.g. not signed, incomplete, with inconsistent supporting documentation) will be rejected. Prior to rejection of claim, CPT will notify a Settlement Class Member in writing if his or her Claim Form was deficient and provide an opportunity to cure his or her Claim within twenty (20) days of provision by CPT of notice of the deficiency.



25. The Plan of Distribution allocates the Net Settlement Fund as follows, an allocation that approximates the relative gross sales in dollar by the various Defendants during the relevant class periods as a percentage of the total of such sales from all Defendants. For purposes of this analysis Walgreen Co., Walgreens Boots Alliance, Inc., or Vision Direct, Inc. will be referred to collectively as a “Defendant Group” as will Arlington Contact Lens Service, Inc., and National Vision, Inc.:

- 74% shall be allocated to Allowed Claimants on Allowed Purchases from 1-800 Contacts, Inc.;
- 20% shall be allocated to Allowed Claimants on Allowed Purchases from Walgreen Co., Walgreens Boots Alliance, Inc., or Vision Direct, Inc.;
- 4% shall be allocated to Allowed Claimants on Allowed Purchases from Arlington Contact Lens Service, Inc., and National Vision, Inc.; and
- 2% shall be allocated to Allowed Claimants on Allowed Purchases from Luxottica of America, Inc.

26. CPT will determine the total Allowed Purchases for each Defendant or Defendant Group, the Allowed Purchases for each Allowed Claim as a percentage of the total of all Allowed Purchases for each Defendant or Defendant Group, and finally the Payment Amount for each Allowed Claim.

27. Distributions will be made through a variety of electronic means: ACH, Venmo and PayPal. Although the claims process will be structured to encourage class members to receive their distribution through electronic means, CPT will provide a claimant with distribution by check sent via U.S. Mail, if the class member so requests.

28. Payments to Settlement Class Members must be redeemed within 90 days and will be tracked and reconciled regularly to determine how many and which payments are redeemed. Payments that are ultimately not redeemed within the allocated time frame will be distributed under further Order of Court upon application of Co-Lead Class Counsel.

### **OBJECTIONS AND REQUESTS FOR EXCLUSION**

29. **Objections:** It is CPT’s understanding that Objections must be served in writing with the Court. However, to the extent any Settlement Class Members submit Objections to CPT, CPT will provide them to Plaintiffs’ counsel for submission to the Court.

30. **Requests for Exclusion:** CPT will maintain record of and inform Plaintiffs' counsel of all Requests for Exclusion submitted by Settlement Class Members.

#### **ADMINISTRATION FEES**

31. CPT estimates its costs for the notice and administration of this Settlement at \$730,000, based on 300,000 claims being filed; its costs will be higher if more claims are filed. CPT understands that it will be paid from the Settlement Fund.

#### **CONCLUSION**

32. The Notice Program as described herein is consistent with similar effective, court-approved notice programs, as referenced in paragraph 20 above, and will provide the best notice practicable given the circumstances. Based on our experience with similar cases, this Notice Program is designed to provide the Settlement Class Members with notice of their legal rights and comports with Rule 23 requirements. In addition to and apart from direct notice via email to a substantial portion of the class, CPT expects to reach at least 75% of the target audience through combined efforts including internet banner advertisement campaign, social media advertisement campaign, and a Nationwide Press Release.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on May 15<sup>th</sup>, 2020 at Irvine, California.

  
JULIE N. GREEN

# **EXHIBIT A**



50 Corporate Park, Irvine CA 92606 • (800) 542-0900 • [www.cptgroup.com](http://www.cptgroup.com)

## CURRICULUM VITAE

### COMPANY PROFILE

CPT Group, Inc., (“CPT”) founded in 1984, is a leading provider of notice and settlement class action administration services and has been appointed as the third-party administrator by all major courts in the State of California and numerous United States District Courts. Located in Irvine, CA, CPT’s client base includes over 10,500 attorneys, both local and nationwide, that have entrusted CPT to bring their experience, expertise and proven excellence to their settlements for administration. Throughout our history, CPT has disbursed billions of dollars in Settlement funds, and serviced over 65,000,000 class members and administrated approximately 4,000 cases. CPT offers a wide range of class action administrative services for developing, managing and executing all stages of integrated settlement plans. This includes pre-certification and discovery mailings, class-certification mailings, claims processing and administration, data management, data reporting, settlement fund administration, legal noticing campaigns, website design and web hosting. Experienced CPT staff currently handles the following types of class action cases: Wage and Hour, FLSA, Employment/ADA, Consumer/Product, Insurance, Securities, Finance, Antitrust, and ERISA.

Once designated by the parties and approved by the court as the third-party administrator, CPT assumes full responsibility in overseeing management of the class database, notification to the class members, claims processing, and disbursement of settlement payments. The operations, IT and production facilities are all located at the corporate headquarters in Irvine. The integrity of CPT’s work is strengthened by the staff’s ability to work in close proximity and keep the work handled in-house. The IT data center is accessible 24/7/365 to authorized CPT personnel. CPT uses internal IT expertise and follows internal business as well as IT policies and procedures to support its daily administration and service operations.

CPT prides itself on being the industry’s premier class action administrator, offering comprehensive and cost-effective class action administration services, utilizing leverages that decades of personal insight and firsthand knowledge from multiple disciplines and legal arenas have provided. CPT is NIST SP 800-171 compliant, administrates hundreds of cases per year, and has disbursed over a billion dollars in settlement funds. With a structured service platform and practice-area expertise, CPT can effectuate the services it provides accurately and expeditiously.

CPT is entrusted by counsel and appointed by the court to handle complex nationwide and statewide class action settlements. Some of our current representative matters include:

- *Jacobo, et al., v. Ross Stores, Inc.*, (C.D. Cal.) Case No. 17-56241, D.C. No. 2:15-cv-04701-MWF-AGR<sub>x</sub>
- *Bokelman v. FCH Enterprises, Inc.*, (D. Haw), Case No. 18-cv-00209-RJB-RLP;
- *Krinsk, et al. v. Monster Beverage Corporation, et al.*, San Diego Superior Court, Case No. 37-2014-00020192-CU-BT-CTL
- *Lim, et al. v. Vendini, Inc.*, California Superior Court Case No. 1-14-CV-259897;
- *Mount v. Wells Fargo Bank*, Superior Court of California Case No. BC395959;
- *Manouchehri v. Styles For Less, Inc.*, United States District Court Case No. 14cv2521 NLS;
- *Kerr, et al. v. Zacks Investment Research, Inc.*, et al., United States District Court Case No. 16-CV-01352 GPC BLM;
- *Hinshaw v. Vizio, Inc.*, United States District Court Case No. SA CV14-00876-DOC (AN<sub>x</sub>);
- *Kerr v. The New York Times Company*, et al., California Superior Court Case No. 37-2016-000010125-CU-MC-CTL;
- *Hightower, et al. v. JPMorgan Chase Bank, N.A.*, United States District Court Case No. 11-CV-01802-PSG-PLA<sub>x</sub>;
- *Romero, et al. v. Loacker USA, Inc.*, California Superior Court Case No. 1-14-CV-274434;
- *Hoover v. Hi-Tech Pharmacal Co., Inc.*, United States District Court Case No. EDCV 13-00097 JGB (OP<sub>x</sub>);
- *Michigan Finance Authority, et al. v. Kiebler, et al.*, Michigan Court of Claims Case No. 13-000166-MZ.

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## AREAS OF EXPERTISE

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- **Project Management** – To ensure a smooth claims administration process, CPT acts as a neutral third party and provides comprehensive case administration from start to finish. Following the timeline set forth in the Settlement Agreement and Court Order, our team of Case Managers ensures that all actions required by the Claims Administrator are met.
- **Claims Administration** – CPT executes an extensive Quality Assurance process throughout the duration of the claims period. Any and all responses received from Class Members are processed according to our strict internal procedures and in accordance with Settlement Agreement. Once claims processing is completed, Counsel is provided with all required reporting, including, where applicable, a list of approved claimants and the settlement calculations for each.
- **Call Center** – CPT maintains a Call Center to provide support for Class Members between the hours of 9:00 AM and 5:30 PM, Monday through Friday, except for major holidays. The Call Center is specially trained to field questions pertaining to the important features of each case. Our Call Center representatives are all bilingual in English and Spanish, and upon special request, CPT can provide support in other languages as well as other time zones.
- **Data Management/Reporting** – Through programmatic analysis, CPT will standardize the class data to compile a master mailing list. CPT prepares weekly status reports for each case that summarize the status of returns and responses such as mail pieces and claim form submissions. CPT Group, Inc. is NIST SP 800-171 compliant, which ensures that necessary measures are taken to guarantee that all class member data is handled and stored in a safe and secure manner.
- **Noticing Expertise** – CPT's legal notice experts have a combined experience of over 25 years in the industry and come together to plan a successful notice campaign based upon the requirements of the Settlement. After strategizing and consulting with Counsel, our team will determine the best method of notification to reach your intended target audience. Whether notification will be through means of a known or unknown data set, CPT will execute the campaign with precision and accountability.
- **Settlement Fund Administration** – CPT Group's staff of accounting professionals oversees the disbursement process for each case in strict detail and in accordance with the terms of the Settlement Agreement. Utilizing a Qualified Settlement Fund (QSF) for each case, CPT maintains its settlement account through a federally insured bank where access to each Settlement Account is restricted to authorized personnel. Bank accounts for each case are reconciled monthly and are available to each client upon request. On behalf of the QSF, CPT Group pays and reports all applicable State and Federal tax withholdings and liability, and issues and reports W-2 wages and 1099 income, as required, for each case.

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## SERVICES

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| <ul style="list-style-type: none"> <li>• Settlement Administration</li> <li>• Pre-Certification Notification</li> <li>• Data Analysis</li> <li>• Bilingual Call Center</li> <li>• Publication &amp; Media Campaigns</li> </ul> | <ul style="list-style-type: none"> <li>• Claims Processing</li> <li>• Class Certification Notification</li> <li>• Secure Data Management</li> <li>• In-House Print &amp; Mail House</li> <li>• Website Hosting</li> </ul> | <ul style="list-style-type: none"> <li>• Settlement Fund Administration</li> <li>• Electronic Notification</li> <li>• Secure Data Reporting</li> <li>• NCOA &amp; Skip Tracing</li> <li>• Website Design</li> </ul> |
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## **REFERENCES**

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For reference, the following Exhibits are attached:

1. CPT's Information Security Statement.
  2. CPT's Data and Settlement Fund Transmission Methods
  3. CPT's Company Brochure.
  4. CPT's Client Testimonials.
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# **EXHIBIT 1**





## **Information Security Statement**

### **Confidential**

CPT Group, Inc. ("Company" or "CPT") maintains a comprehensive, written Information Security Program that complies with all applicable laws and regulations and is designed to (a) ensure the security, privacy and confidentiality of Class Member Information, (b) protect against any reasonably anticipated threats or hazards to the security or integrity of the Class Member Information, and (c) deny unauthorized access to, use, deletion, or modification of Class Member Information. As part of an ongoing effort, throughout its business CPT has implemented the following security controls and procedures:

- 1) Company uses Class Member Information only for the purposes for which Client provided it, as described in any Agreements and/or Court Order's governing the provisions of the Company's services on any particular engagement.
- 2) Company has designated one of more specifically named employees to be responsible for the administration of its Information Security Program.
- 3) Company has and maintains processes for identifying, assessing, and mitigating the risks to Class Member Information in each relevant area of the Company's operations and evaluating the effectiveness of the safeguards for controlling these risks.
- 4) Company runs and analyzes daily Risk Assessment and Threat Intelligence scans on all company computer stations, servers and protected network subnets. These scans search for any software vulnerabilities along with data containing sensitive information ("SI").
- 5) All computers are provisioned with an advanced security stack. Company's Endpoint Protection centrally reports activity, handles patch management and security policies. Company's security stack is based on DNS and content filtering, deep packet inspection at the firewall level, antivirus/antimalware, email filtering and user behavior analysis. Each endpoint is monitored with modern Data Loss Prevention ("DLP") software. Company's DLP system prevents connection to unauthorized external storage, cloud systems or email accounts. It actively blocks screen prints and will not allow confidential user information to be sent out of our trusted network.
- 6) Login access to Company email or systems requires two factor authentication, which requires not only a password and username but also something physical, like user location, secure ID token or biometrics.
- 7) Company regularly monitors, tests and updates its Information's Security Program.
- 8) Company restricts access to Class Member Information only to those employees, agents, or subcontractors who need to know the information to perform their jobs.
- 9) Company performs an annual audit of its Information Security Program. This includes a review of the controls: vulnerability scans, secure software development life cycle, patch management, intrusion detection and prevention, encryption of storage media and devices. Company makes reasonable changes to its Information Security Program to ensure it can maintain safeguards that are appropriate for the Class Member Information at issue.
- 10) At Client's request, but only when and in a manner consistent with applicable Agreements and/or Court Orders, Company will securely destroy or return all Class Member Information in its possession and certify to Client in writing that Company has done so. If Company destroys Class Member Information rather than return it, Company will use destruction methods that are in compliance with all applicable state and federal laws and regulation including NIST Special Publication 800-88, Revision 1 (2014). This obligation to return or destroy information shall not apply to Class Member Information that is stored in backup or other disaster recovery systems, archives or other storage systems that make it impractical to

destroy the information, but if Company retains Class Member Information for these reasons, its obligation under the Settlement Agreement will continue to apply for so long as it retains the information. Additionally, the Company will retain all hard copy documents (i.e. Claim Forms, etc.) for a period of 6 months, at which time they are scanned and shredded on Company premises in compliance with NIST Cybersecurity Framework.

- 11) Company performs extensive background checks (County Criminal, County Civil and National Criminal Database Search) of all its employees, including a review of their references, employment edibility, and education verification to ensure they do not pose a risk to the security of Class Member Information or Clients employees. Company will provide, upon request, a copy of its background check requirements for Clients review and approval. Nothing in this document shall compel Company to disclose the results of such background information of its employees.
- 12) Company conducts a monthly third-party credentialed vulnerability assessment with Trustwave. Vulnerabilities rated as high are patched/resolved with 48 hours. Medium is 1 week and Low is within 2 weeks. If a vulnerability cannot be resolved within our standard time, a compensating control will be introduced to protect the vulnerable systems. To ensure Company receives timely information regarding new threats and vulnerabilities, Company subscribes to US-CERT notices as well as notices are received from Sonicwall our firewall manufacturer. New threats are communicated to our executive and leadership team to disseminate to all employees within the company.
- 13) Company has implement the following safeguards for systems that process, store or transmit Class Member Information:
  - Identify and Access Management;
  - Windows password complexity with a specific length, history, upper and lower characters, numbers, expiration every 45 days, and separate password for email and computer;
  - Two-Factor authentication for remote access;
  - Removable media devices, personal web-based email, instant message, or online storage (i.e. Dropbox, Google Drive, iCloud, etc.) are blocked and restricted by the firewall;
  - Company uses the Microsoft Azure cloud to host corporate email. Remote access to the email system is disabled;
  - Company uses the HTTPS or FTP standard for all data transmissions, and shall ensure that all Client Data is encrypted while in transmission between Company's data center and the Company's computer system or other device (as applicable) and at rest, consistent with the NIST standard, but no less than a 128-bit key for symmetric encryption and a 1024-bit key for asymmetric encryption.
  - Company requires its clients and self to transfer files with personal Class Member Information via a secure transmission protocol through Citrix Sharefile FTP which secures file during transfer with SSL/TFL encryption protocols and in storage using AES 256-bit encryption. Links to file expire after 7 days. Company requires all files transferred in this method to be password protected during transmission and password to be provided telephonically only. Files are retrieved by Company, and then deleted manually upon successful download (or auto-deleted after 7 days from upload by system)'
  - Upon hire and annually thereafter, security training of all employees using the online security training platform Knowbe4. Users are required to do one hour of security training per year in additional to 20 minutes of training per quarter. Users are required to take tests online to ensure they've retained the knowledge. Topics covered are spear phishing emails, compromised website, social engineering, strong passwords, ransomware, handling sensitive information, mobile device security;
  - Company actively tests security defenses. Staff participate in simulated phishing exercises to reinforce previous training. Company also conducts monthly external penetration tests and daily internal vulnerability scans to ensure the integrity of our security measures;
  - Preventing terminated employees from accessing Class Member Information;
  - Appropriately configured and updated firewall, antivirus, and spyware software;
  - Separation of Duties;
  - Business Continuity Planning;

- Disaster Recovery Planning;
- Pandemic Recovery Planning

- 14) Company's physical security requires that employees use an encoded card-key to gain access to the facility as all doors are mechanically locked at all times. Employees can only enter or exit through a front door or back door, both of which are protected by security cameras. Inside the facility, secure areas in the office that contain checks or sensitive material are also protected by the electronic card-key badge access and limited to select employees. Security cameras monitor the areas that contain the sensitive material and audits are conducted periodically on the area. Access to the server room is strictly limited to only five individuals and protected by the encoded card-key badge access. Security cameras monitor the inside and outside of the secured area with audits being conducted periodically.
- 15) Company staff are required to maintain in compliance with the Information Security Policies, Compliance Manual, and Non-Disclosure Agreement. The matters covered in the Code of Business Conduct and Ethics are of the utmost importance to the Company and are essential to the Company's ability to conduct its business in accordance with its stated values. We expect all of our officers, directors, employees, agents, contractors and consultants to adhere to these rules in carrying out their duties for the Company. The Company will take appropriate action against any officer, director, employee, agents, contractor or consultant whose actions are found to violate these policies or any other policies of the Company. Disciplinary actions may include immediate termination of employment or business relationship at the Company's sole discretion. If the Company has suffered a loss, then it may pursue its remedies against the individuals or entities responsible. If laws have been violated, then the Company will fully cooperate with the appropriate authorities.

#### Definitions

- 1) **"Class Member Information"** means Class Member name, address, or other contact information and class member claim filing information necessary for Company to perform services required by applicable Agreements or Court Orders in context to the Administration of a Settlement or other Class Action litigation.
- 2) **"Client"** means collectively Plaintiff Counsel and Defense Counsel.
- 3) **"Client Data"** means proprietary or personal data regarding Client or any of its Class Members under the Settlement Agreement, as provided by Client.
- 4) **"Company"** means CPT Group, Inc. a reputable third-party Claims Administrator selected by all the Parties (Plaintiff and Defense Counsel) to administer the Settlement or Notification Mailing.
- 5) **"Sensitive Personal Information"** means any non-public information of CPT or Client disclosed by either party to the other party, either directly or indirectly, in writing, orally or by inspection of tangible objects, or to which the other party may have access, which a reasonable person would consider confidential and/or which is marked "confidential" or "proprietary" or some similar designation by the disclosing party. Confidential Information shall not include any information which the recipient can establish: (i) was or has become generally known or available or is part of the public domain without direct or indirect fault, action, or omission of the recipient; (ii) was known by the recipient prior to the time of disclosure, according to the recipient's prior written documentation; (iii) was received by the recipient from a source other than the discloser, rightfully having possession of and the right to disclose such information; or (iv) was independently developed by the recipient, where such independent development has been documented by the recipient.

# **EXHIBIT 2**



## TRANSMISSION METHODS FOR SENSITIVE INFORMATION

CPT Group, Inc. ("CPT") maintains strict guidelines for the submission, transfer, and protection of Client Data and Wire Information.

### A. CLIENT DATA TRANSMISSION METHODS

Counsel shall submit all Client Data to CPT as follows:

1. Link provided by CPT to secure FTP (sharefile) for transfer of data files.
2. All files uploaded should be password protected.
3. Password provided to CPT personnel telephonically.
4. Once files are uploaded to and retrieved, files are deleted (files set on autodelete after 7 days of upload).

Counsel agrees and acknowledges that the above method is the only method authorized by CPT to receive Client Data. Attempts to transmit Client Data by other means are customarily not accepted. In the event Counsel utilizes other means to transmit or attempt to transmit Client Data, CPT disclaims all responsibility for such transmissions or attempted transmissions.

### B. BANK WIRE INFORMATION

*Incoming from Defense Counsel to QSF.*

CPT provides Qualified Settlement Fund bank account wire instructions to Defense Counsel as follows:

1. Wire instructions are printed in PDF format, are uploaded with password protection, and are made available to Defense Counsel via secure Sharefile.
2. CPT will call Defense Counsel directly and provide the password telephonically.
3. Defense Counsel is requested to then call CPT prior to wiring funds to confirm receipt of all applicable information.

Defense Counsel agrees and acknowledges that the above method is the only method authorized by CPT to communicate QSF wire instructions. CPT will decline attempts by Defense Counsel to receive such instructions by other means. In the event Defense Counsel utilizes other means to transmit or attempt to transmit wire instructions, CPT disclaims all responsibility and liability for such transmissions or attempted transmissions including without limitation for any unauthorized access, acquisition, destruction or loss of such wire instructions.

*Outgoing from QSF to Plaintiff Counsel.*

1. CPT does not send passwords via email either internally or externally.
2. For wire instructions for Plaintiff Counsel, such instructions should be communicated to CPT either by phone or by secure Sharefile.
3. CPT will confirm wire information on file with the bank name and last four digits of the account number only.

Plaintiff Counsel agrees and acknowledges that the above method is the only method authorized by CPT to communicate wire instructions. CPT will decline attempts by Plaintiff Counsel to receive such instructions by other means. In the event Plaintiff Counsel utilizes other means to transmit or attempt to transmit wire instructions, CPT disclaims all responsibility and liability for such transmissions or attempted transmissions including without limitation for any unauthorized access, acquisition, destruction or loss of such wire instructions.

# **EXHIBIT 3**




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Class Action Administrators

The Industry's Premier  
Class Action Administrator





**CPT Group is the Nation's premier Class Action Claims Administrator handling a broad spectrum of cases with value-added, single-source expertise, and premier service.**

Putting CPT Group in place as your Administrator influences every element of the process thereafter. Rely on us to analyze, plan, and administrate with integrity, drawing from a broad base of administration experience with class action settlement and beyond.

#### **Value Added Philosophy**

CPT Group's cadre of experts understands how each piece of the administrative puzzle fits seamlessly into the big picture. Dynamic, capable, and service-centric our elite staff delivers peak productivity and value. The longevity of our Administrators, stringently tested Case Managers, and trusted Consultants merge to assure neutrality, attention to detail and quality for "true-number" proposals and no costly surprises.

#### **Best In Class Service**

From informed Case Managers who are your single point of contact, to secure in-house resources, we work as one to bring you superior service you can rely on. Count on us to be fully up to date, aware of all contingencies, and espond with speed and accuracy.

#### **Capabilities**

Selecting CPT Group is the first step in determining the outcome of your settlement. Multifaceted capabilities, the distinct advantage of experience, particularly in cross category settlements, require that all pieces are organized, positioned correctly and put into place.

#### **One team. One purpose. We put you first.**

#### **Proprietary Technology and Superior Workflow**

Without doubt, the security of settlement information is of the utmost importance.

### **AdminLink: Internal Case Information Access Management**

Exclusive proprietary technology offers access to real time reports, response rates and more, 24/7. With AdminLink, our operations staff can access current case information in one single location, ensuring every CPT staff member involved in your case is up to date and has all the information they need at their fingertips.

### **Comprehensive Marketing**

Our onsite print/mail house and web development team not only affords you greater value and tighter security, we assure full legal compliance in all materials and up to date information for all class members, thereby reducing demands on client time and resources.

## **Comprehensive Service**

### **Pre-Settlement Consulting**

Entrusting class action administration to CPT Group is the first step in the confident achievement of the goals of the lawsuit. Our full spectrum consultation services address every critical area of need, providing clear and actionable planning combined with cost-effective administration.

- Preliminary Approval Declarations
- Settlement Agreement Consultation
- Timelines
- Scheduling
- Statistical Reporting
- Notice Campaign Planning
- Neutral Third Party Administrator

### **Legal Notification**

CPT Group is adept at third-party data hosting and communication services using proprietary technology across multiple platforms, including print, media and online. Clear-language

documents, translated according to class member needs, support and guide members through a seamless case rollout, regardless of scope or complexity.

- Pre-Certification/Belaire West/Privacy Mailing
- Class Certification Noticing
- Settlement Notification
- Formatting Legal Notices
- Electronic Notification email/website
- Translation Services
- In-House Production
- Expert Legal Noticing Campaigns
- In-House Translation Services

### **Data Management**

Quality, accuracy, speed and security are the cornerstones of CPT's proprietary technology and data management systems. We developed our specialized data management, analysis and reporting tools to move the skillset up, innovate new and better solutions and create a superior workflow with complete and timely accountability and efficiency.

- Data Analysis
- Data Entry
- Data Management
- Secure Data Transfer
- Data Reporting

### **Class Member Assistance**

Customer response and targeted outreach receive multilevel attention. We have a massive capacity to handle this all-important aspect of settlement administration. Our multilingual call center offers class members 1:1 responsiveness. Interactive Voice Response assures that class members receive the assistance and support they require. Our proprietary, case-specific call tracking system uses dedicated toll-free numbers, and highly trained



representatives to document and maintain an accurate class member history of interaction.

- Live Call Center Support (multilingual)
- Interactive Voice Response (IVR) capabilities
- Proprietary Call Tracking System

### Claims Administration

At the heart of CPT's administrative capabilities is our ability to process claims accurately, efficiently and in full compliance. Our skilled approach to using technology and controlling management costs is the bedrock of our effectiveness. Regardless of class size or case intricacy, we address all aspects of administration to provide comprehensive and complete solutions.

- In-House Secure Data Processing
- Track & Process Undeliverable Mail
- Claims Processing (mail/online)
- Host & Maintain Case Websites
- Secure Claims Validation

### Settlement Fund Administration

CPT's centralized fund distribution process manages fully audited and securely supervised accounts, handling all aspects of Federal and State tax filings and forms printing and distribution to all recipients.

- Secure Disbursement Processing

- Qualified Settlement Fund (QSF) Management (establish/maintain)
- Federal and Multi-State Tax Reporting (W2/1099)
- Physical Checks, ACH, eCheck, Merchant eGift Cards, Merchant Physical Gift Cards, and Prepaid Debit Cards Options
- Escheatment of Unclaimed Settlement Funds
- Cy Pres Distribution

### Widespread Experience

- |                            |                       |
|----------------------------|-----------------------|
| • FLSA                     | • Government Services |
| • Wage & Hour              | • Insurance           |
| • Labor & Employment       | • Securities          |
| • PAGA                     | • Finance             |
| • Consumer                 | • Antitrust           |
| • Product Liability        | • ERISA               |
| • Data Breach Notification |                       |

### Contact Us 800.542.0900

CPT Group, Inc. is not just part of the solution. It is the solution. Please allow us to answer your questions and discuss your immediate and future needs.

# **EXHIBIT 4**





## What our clients have to say about CPT Group, Inc.

*"I have worked with CPT for 10+ years. CPT is detail-oriented, excellent at meeting deadlines, anticipates potential issues while proposing resolutions, mindful of sensitive private information and safeguards it accordingly, reliable and communicates proactively. CPT is priced competitively for service that surpasses its competition. I have worked with numerous service providers; CPT is by far the best."*

**Anthony Orshansky, Esq.,** CounselOne, P.C.

*"CPT has extraordinary customer service. They always go above and beyond to resolve any questions we may have. Their responses to our emails are always prompt and are incredibly helpful with last minute needs. Their weekly reports are incredibly useful!"*

**Craig Ackermann, Esq.,** Ackermann & Tilajef, P.C.

*"I have successfully worked with CPT in administering several multi-million settlements and several Bel-Air privacy notices. CPT was cost-conscious in each instance, often capping their costs to ensure Court approval. Moreover, they quickly respond to inquiries, and expeditiously address problems that surface — maintaining a professional demeanor at all times."*

**Raul Perez, Esq.,** Capstone Law, APC.

*"I have utilized the services of CPT over the past five or six years to handle all aspects of wage and hour class actions of various sizes. They consistently deliver on time with extremely competitive pricing. The case managers are reliable, efficient and accessible to handle any issue that comes up. I am so pleased with CPT's handling of wage and hour matters that I am now turning to them to administer our consumer class actions as well."*

**Marcus J. Bradley, Esq.,** Bradley & Grombacher, LLP.

*"CPT's employees pay great attention to detail, are extremely hard-working, are particularly conscious of deadlines, foresee potential issues that may arise and address them proactively, are smart, high-IQ individuals and are easy to work with. I've worked with many of the "best" Class Action Administration firms, and CPT is the best!"*

**Zach Dostart, Esq.,** Dostart Hannink & Coveney, LLP.

*"CPT Group is by far my preferred Settlement Administrator!"*

**Tim Johnson, Esq.,** Ogletree Deakins Nash Smoak & Stewart

*"CPT is always quick to respond to any calls or emails and work on the tasks needed. They follow up and always keep their word on pricing. We have used CPT many times and never once have had an unpleasant experience. That is hard to find with any vendor."*

**Doug Johnson, Esq.,** Johnson & Johnson

*"CPT understands Class Actions and the requirements for properly noticing the Class. They have experience project manager overseeing the Administration."*

**Diana Khoury, Esq.,** Cohelan Khoury & Singer

*"I am extremely happy with all that you have done with the administration of this matter. Excellent service, from start to finish, as to all matters and you stayed within budget! You don't know how happy that makes me. CPT is our #1 admin company. Please feel free to use me as a reference."*

**Denise M. Caprioli, Esq.,** McMillion & Hirtensteiner

*"I routinely go back to CPT for class action services because they have proven over and over that they provide excellent service for a great value. When I hire CPT, I know that I can get instant, personal attention on any issue that comes up, and that my matter will be handled with the attention to detail that I expect. I like being able to call and reach people I trust."*

**Jeff Ames, Esq.,** Paul Plevin Sullivan & Connaughton

*"I have used CPT successfully over the last four or five years on a variety of wage hour class action cases. I find them to be very professional class action administrators in their on-time delivery of work product, their great process of keeping counsel updated and their reasonable pricing. I will use them again."*

**Robert Yonowitz, Esq.,** Fisher & Phillips LLP

*"Fast, friendly responses to all my questions. High quality work."*

**Patrick Stark, Esq.,** Ford, Walker, Haggerty, & Behar

*"CPT can handle all aspects of our wage and hour class actions, from privacy opt out notices to administering claims. CPT handles these matters quickly and efficiently and always on budget."*

**Derek S. Sachs, Esq.,** Lewis Brisbois Bisgaard & Smith LLP

*"It's one thing to retain a third-party administrator. It's another to retain professionals who communicate well and will go the extra mile to ensure that all parties are completely satisfied."*

**Joel P. Kelly, Esq.**, Jackson Lewis

*"CPT is great, they have tremendous service, knowledgeable staff and make the experience seamless and efficient. I would recommend them for jobs big or small."*

**Eric B. Kingsley, Esq.**, Kingsley & Kingsley

*"CPT is as professional as they come. Their team really goes the extra mile to work with you and your team. Do yourself a favor and get to know the CPT Group."*

**Brian S. Kabateck, Esq.**, Kabateck Brown Kellner, LLP

*"On behalf of the defendants, we were extremely pleased with the service that CPT Group provided and would not hesitate using your services again."*

**Philip L. Ross, Esq.**, Littler Mendelson, P.C.

*"I truly appreciate your patience and assistance on this. I will certainly recommend you and your company in the future when "class action administration" services are needed...it seems the administration part of the case has been handled with minimal headaches for me personally."*

**Rhonda Wolf, Esq. General Counsel**, United Oil Company

*"I have used CPT Group as a wage and hour class action administrator in several cases. On each occasion, CPT has been thorough, responsive, and efficient. I have enjoyed working with CPT and look forward to working with CPT in the future."*

**Howard Z. Rosen, Esq.**, Posner & Rosen LLP

*"The administration of a class action settlement—even an uncomplicated one—involves a lot of moving parts, and there are a lot of companies that proclaim expertise in this field. But my "go to" claims/settlement administrator is CPT Group because they manage things seamlessly—which is something my Firm counts on. CPT anticipates and solves problems before they become big "issues." And they are all good people too."*

**Dylan Pollard, Esq.**, Pollard & Bailey