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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES**

HEATH SELTZER, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

GEOFFREY H. PALMER; GEOFFREY H.  
PALMER dba G.H. PALMER ASSOCIATES;  
GHP MANAGEMENT CORPORATION, a  
California corporation; and DOES 1-50,  
inclusive

Defendants.

Case No.: 18STCV07828 (Lead)  
Consolidated with No.: 20STCV22701

**DECLARATION OF SETTLEMENT  
ADMINISTRATOR REGARDING  
SUPPLEMENTAL NOTICE PROGRAM  
COMPLIANCE**

1 I, Rebecca L. Taylor, hereby declare the following:

2 1. I am an Associate Project Manager with Angeion Group, LLC (“Angeion”), located at  
3 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to  
4 this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and  
5 would testify competently thereto.

6 2. Angeion was appointed to serve as Settlement Administrator pursuant to the Court’s  
7 December 5, 2022, *Order Granting Preliminary Approval of Class Action Settlement*.

8 3. The purpose of this declaration is to provide the Parties and the Court with a summary  
9 of the work performed by Angeion to effectuate Supplemental Noticing in the above-captioned case  
10 pursuant to the Court’s *Notice of Ruling* dated August 14, 2023.

11  
12 **SUPPLEMENTAL DIRECT NOTICE**

13 **Class Data**

14 4. On July 31, 2023, as ordered by the Court, Counsel for GHP provided Angeion with an  
15 electronic file containing approximately 2,506 additional records containing Class Member mailing  
16 address and email address information. After analyzing the data and removing duplicative records,  
17 Angeion identified approximately 1,727 unique noticing records with a valid email address.

18 **Email Notice**

19 5. As part of the Supplemental Notice Plan, on August 31, 2023, Angeion caused the  
20 Supplemental Notice to be emailed to 1,727 Class Members. Of these 1,727, there were 63 hard  
21 bounces. Angeion caused the Supplemental Notice to be mailed to these 63 Class Members via Postcard  
22 on September 22, 2023.

23 **Postcard Notice**

24 6. As part of the Supplemental Notice Plan, Angeion caused the Supplemental Notice to  
25 be mailed via Postcard to 384 Class Members on August 31, 2023, for whom it did not have a valid  
26 email address.

27 7. Prior to mailing, Angeion caused the mailing list to be updated utilizing the United  
28 States Postal Service’s (“USPS”) National Change of Address database, which provides updated

1 address information for individuals or entities that have moved during the previous four years and filed  
2 a change of address with the USPS.

3 8. As of December 4, 2023, Angeion received 105 Supplemental Notices returned by  
4 USPS as undeliverable. Angeion conducted skip traces in an attempt to locate updated address  
5 information. Angeion located 33 updated addresses through skip tracing to which a notice was re-  
6 mailed.

7 **SETTLEMENT WEBSITE AND TOLL-FREE TELEPHONE SUPPORT**

8 9. On December 15, 2022, Angeion established the following website devoted to this  
9 Settlement: [www.GHPLateFeeSettlement.com](http://www.GHPLateFeeSettlement.com) (“Settlement Website”). The Settlement Website  
10 contains general information about the Settlement, including important dates and deadlines pertinent  
11 to this matter, and copies of important documents, including the Class Notice, Order Granting Motion  
12 for Preliminary Approval of Class Action Settlement, Stipulation of Settlement, Supplemental Briefing  
13 in Support of Motion for Preliminary Approval, Complaint, and Plaintiff’s Notice of Motion and  
14 Motion for Attorney Fees, Reimbursement of Expenses, and Payment of Service Awards. The  
15 Settlement Website also allowed Class Members to electronically elect to receive their Settlement Share  
16 via PayPal, Venmo, virtual Mastercard, or physical check. The Settlement Website also has a “Contact”  
17 page that provides an address, phone number, and email address for the Settlement Administrator.

18 10. Angeion has maintained and updated the Settlement Website throughout the  
19 Supplemental Notice period and will continue to do so until further directed by the Parties or the Court.

20 11. As of December 4, 2023, the Settlement website has had 2,419 sessions and 5,089 page  
21 views between August 31, 2023, and December 4, 2023.

22 12. On December 15, 2022, Angeion established the following toll-free line devoted to this  
23 case: 1-855-503-3331. The toll-free line utilizes an interactive voice response (“IVR”) system to  
24 provide Class Members with responses to frequently asked questions and information about filing a  
25 claim and important deadline dates. The toll-free line is accessible 24 hours a day, 7 days a week.

26 13. Angeion has maintained and updated the toll-free line throughout the Supplemental  
27 Notice period and will continue to do so until further directed by the Parties or the Court.

28 14. As of December 4, 2023, the toll-free number has received 40 calls, totaling

1 approximately 207 minutes between August 31, 2023, and December 4, 2023.

2 **PAYMENT METHOD ELECTION FORMS**

3 15. The deadline to submit a Supplemental Payment Election Form was October 30, 2023.  
4 Between August 31, 2023, and December 4, 2023, Angeion received approximately 131 Payment  
5 Method Election Forms.

6 **REQUESTS FOR EXCLUSION AND OBJECTIONS TO THE SETTLEMENT**

7 16. The Supplemental Notice deadline for Class Members to request exclusion from the  
8 Settlement was October 30, 2023. As of December 4, 2023, Angeion has not received any opt-out  
9 requests to the Settlement.

10 17. The Supplemental Notice deadline for Class Members to object to the Settlement was  
11 October 30, 2023. As of December 4, 2023, Angeion has not received or otherwise been made aware  
12 of any objections to the Settlement.

13 **ESTIMATE OF NOTICE & ADMINISTRATION COSTS**

14 18. Angeion estimates the total cost to provide supplemental notice and administration  
15 services will be approximately \$29,400.

16  
17 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.  
18  
19

20 Dated: December 5, 2023

21 Rebecca Taylor  
22 REBECCA TAYLOR  
23  
24  
25  
26  
27  
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