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Electronically FILED by
Superior Court of California,
County of Los Angeles
8/06/2026 4:59 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Covarrubias, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

Sargis Isayan, on behalf of himself, all others
similarly situated, and the general public,

Plaintiff,

v.

Cedar Fair, L.P., a Delaware limited
partnership; **Cedar Fair Management, Inc.**,
an Ohio corporation; **Six Flags
Entertainment Corporation**, a Delaware
corporation; and **John Does 1—10**,

Defendants.

Case No. 24STCV16212
Hon. Elaine Lu, Dept. 9

**Declaration of Michael Lynch of Angeion
Group, LLC re: Proposed Notice Plan**

Date: September 17, 2026
Time: 8:30 AM
Dept.: 9

Action Filed: June 28, 2024
Trial Date: N/A

1 I, Michael Lynch, declare:

2 1. I am the Head of Class Action Sales (formerly the Executive Vice President of Client
3 Strategy and Solutions) at the class action notice and claims administration firm Angeion Group,
4 LLC (“Angeion”). I have personal knowledge of the matters stated herein. I am over 21 years of age
5 and am not a party to this action.

6 2. I am a licensed attorney in the Commonwealth of Pennsylvania with over five years
7 of class action experience. I have been involved in the planning of hundreds of court-approved
8 notice and administration programs, including some of the largest and most complex notice plans
9 implemented by Angeion.

10 3. My prior declaration detailed Angeion’s significant experience with class action
11 notice and claims administration.

12 4. While the claim form in this case is relatively simple, there are potentially some
13 reasons why a claim would be defective and require Angeion to solicit additional documentation.
14 For example, if the claimant submits a paper claim form but does not sign the form, Angeion would
15 request the claimant re-submit the claim form with an executed signature page. There are other one-
16 off situations where Angeion would request documentation from the claimants, such as name
17 change documentation or power of attorney documentation. Documentation may be required to
18 confirm class membership if the claimant cannot be matched to a class member record in the data
19 Angeion receives. Angeion may also contact the claimant if the claimant submits a paper claim
20 form that is illegible, does not select a payment method, selects multiple payment methods, or does
21 not provide the requisite information for the payment method selected.

22 5. Angeion has previously administered class actions with a similar settlement structure
23 as this one: credits automatically distributed to the class members, unless the class member files a
24 claim requesting cash instead. Some of these cases involved processing fees on ticket sales. Based
25 on this experience and the claims rates in those cases, Angeion estimates that the claims rate for
26 receiving cash instead of credit will be approximately 3-5%.

27 6. Based on Angeion’s experience implementing notice plans that include email notice,
28 most email non-delivery notifications (commonly referred to as “bouncebacks”) are received and

1 identified within one to three days after transmission, with certain permanent delivery failures
2 reported nearly immediately. In some instances, however, delivery attempts may continue for
3 several days before an email is ultimately determined to be undeliverable. As a result, Angeion may
4 not receive final confirmation of non-delivery until approximately five days after the email is sent.

5 I declare under penalty of perjury under the laws of the State of California that the foregoing
6 is true and correct.

7
8 Dated: July 27, 2026



Michael Lynch

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am over the age of 18 and not a party to this action. My business address is 222 N. Pacific
4 Coast Highway, Suite 2000, Los Angeles, CA 90245.

5 On the undersigned date, I caused to be served the following documents:

6 **Declaration of Michael Lynch**

7
8 I caused the documents to be served on the interested parties:

9
10 Thomas McCormick
11 Christopher Ingram
12 Adam Borgman
13 VORYS, SATER, SEYMOUR
14 AND PEASE LLP
15 2211 Michelson Drive, Suite 500
16 Irvine, CA 92612
17 tnmccormick@vorys.com
18 clingram@vorys.com
19 amborgman@vorys.com

20 *Counsel for Defendants*

21
22 I uploaded and served the documents to the Case Anywhere repository for this case.

23 I declare under penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct.

25 Dated: August 6, 2026

26
27
28

Dan Terzian