Case	3:22-cv-00498-H-SBC	Document 57	Filed 02/12/24	PageID.584	Page 1 of 2	
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15	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA					
16 17	MARLENE STEINE	BERG,	CASE NO	D. 3:22-cv-0	0498-H-SBC	
17 18	P	laintiff,	NOTICE SUDDLE	OF FILING	G DECLARATION	
19	vs.		OF SET	INENTAL D ILEMENT ISTRATOR	JECLARATION	
20	CORELOGIC CREE	DCO, LLC,			1 2024	
20	D	efendant.	Time: 10:	Date: March 1 30 a.m. Iarilyn L. Huf	f	
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1	PLEASE TAKE NOTICE, that pursuant to the Court's Preliminary Approval				
2	Order (ECF No. 49), Plaintiff Marlene Steinberg ("Plaintiff") submits the attached				
3	Supplemental Declaration of the Settlement Administrator. This Declaration				
4	supplements the Declaration of the Settlement Administrator filed on December 15,				
5	2023 in support of the Motion for Final Settlement Approval. (ECF No. 55-1.)				
6					
7	Respectfully submitted,				
8	Dated: February 12, 2024				
9	BERGER MONTAGUE PC				
10	By: /s/E. Michelle Drake				
11	E. Michelle Drake, pro hac vice				
12	Joseph C. Hashmall, pro hac vice				
13	Attorneys for Plaintiff				
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	1 NOTICE OF FILING, No. 3:22-cv-00498-H-SBC				

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA						
3 MARLENE STEINBERG, Plaintiff,	98-H-SBC					
4 v. 5 CODELOCIC CREDCO LLC						
6 CORELOGIC CREDCO, LLC, 7 Defendant.						
SUPPLEMENTAL DECLARATION OF RYAN BAHRY REGARDING SETTLEMENT ADMINISTRATION						
I, RYAN BAHRY, declare and state as follows:						
1. I am a Director at JND Legal Administration ("JND"). JND is a legal						
administration service provider with its headquarters located in Seattle, Washington. JND has						
	extensive experience with all aspects of legal administration and has administered settlements in					
 hundreds of class action cases. 2. JND is serving as the Settlement Administrator¹ in the abo 	ve centioned litigation					
2. JND is serving as the Settlement Administrator ¹ in the above-captioned litigation ("Action"), for the purposes of administering the Settlement Agreement and Release,						
preliminarily approved by the Court in its Order: (1) Certifying Class for Settlement Purposes;						
(2) Preliminarily Approving Class Settlement; (3) Appointing Class Representative and Class						
Counsel; (4) Approving Class Notice; and (5) Scheduling Final Approval Hearing, dated October						
20 2, 2023 ("Order").						
21						
$\frac{22}{23} = \frac{1}{1} $						

¹ Capitalized terms used and not otherwise defined herein shall have the meanings given such terms in the Settlement Agreement and Release.

3. This Supplemental Declaration is meant to supplement my previous declaration dated December 12, 2023 (the "Declaration," ECF No. 55-1). This Supplemental Declaration is based on my personal knowledge and information provided to me by experienced JND employees and, if called on to do so, I could and would testify competently thereto.

REQUESTS FOR EXCLUSION

4. As detailed in the Declaration, the Notices informed recipients that any Class Member who wished to exclude themselves from the proposed Settlement ("opt-out") must do so on or before January 5, 2024.

5. As of the date of this Declaration, JND has received three (3) timely requests for exclusion from Class Members M.J. Flaherty (Great Falls, MT), I. Lehman (Goshen, IN), J. Cottrill (Effingham, IL), and one (1) timely request for exclusion from non-Class Member D. Bard (San Francisco, CA).

OBJECTIONS

As detailed in the Declaration, the Notices informed recipients that any Class
 Member who wished to object to the proposed Settlement must do so on or before January 5,
 2024.

7. As of the date of this Declaration, JND has not received, and is not aware of, any objections.

CLAIM FORMS RECEIVED

8. As detailed in the Declaration, the Notices sent to Claim Form categorized Class Members informed recipients that they must file a Claim Form by mail or electronically on the Settlement Website, on or before January 5, 2024.

SUPPLEMENTAL DECLARATION OF RYAN BAHRY REGARDING SETTLEMENT ADMINISTRATION 9. As of the date of this Supplemental Declaration, JND has received a total of 423,825 Claim Form submissions. On December 18, 2023, the Settlement was advertised on www.topclassactions.com, a third-party aggregator website, which provided a link to the Settlement Website's online election portal. JND received a high volume of online election submissions from non-Class Members.

10. JND reviewed the 423,825 submissions against the class data and invalidated all submissions filed by non-Class Members, disregarded untimely postmarked or duplicate Claim Forms, and disregarded Claim Forms that were filed by Auto-Pay Class Members to determine a total number of 4,910 eligible Claim Forms submitted by Class Members. These 4,910 Claim Form Class Members, and a total of 4,324 unique Auto-Pay Class Members are eligible to receive a payment under this Settlement.

CLAIM FORM VALIDATION

11. JND utilizes procedures for claims validation which include proprietary analytics methods for identifying Claim Forms that are fraudulent. Many of those procedures are obvious, such as verifying the submitter's name and contact information against the Class List. Others, however, involve procedures to identify fraudulently auto-generated mass claims. JND is confident that the final population of Class Members whose Claim Form submissions were validated are legitimate Class Member submissions.

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12. Should the Court require further detail regarding JND's claim validation procedures, JND has provided Class Counsel with a supplemental declaration describing such procedures in further detail and requests that declaration be filed under seal, if it is deemed necessary to file. JND is also willing to make a corporate representative available to answer any questions the Court may have during the Final Approval Hearing.

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

Executed February 12, 2024 in Seattle, Washington.

Ryan M. Bahry