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NEXT PAGE

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

GREG AKILI, BLACK LIVES
MATTER LOS ANGELES,
SHANNON THOMAS, and EMILY
ALLERS, individually and as
taxpayers, on behalf of a class of
similarly situated persons,

Plaintiffs,

v.

CITY OF LOS ANGELES, a municipal
entity, LIEUTENANT CARLOS
FIGUEROA (No. 35260), CAPTAIN
WARNER CASTILLO
(No. 31715), OFFICER DANIEL ORLIK
(No. 43917), OFFICER BRITTANY
PRIMO (No. 40695), and DOES 1-10,

Defendants.

Case No. 22STCV00934

[Assigned for all purposes to Honorable Theresa M.
Traber]

DECLARATION OF CAROL A. SOBEL IN
SUPPORT OF PLAINTIFFS' MOTION FOR
APPROVAL OF CLASS NOTICE AND
APPOINTMENT OF CLASS ADMINISTRATOR

[Filed concurrently with Motion for Approval of
Class Notice and [Proposed] Order]

Hearing Date: 09/09/2026

Hearing Time: 10:30 AM

Dep't.: 1

Action Filed: 1/10/2022

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DECLARATION OF CAROL A. SOBEL

I, Carol A. Sobel, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, State Bar No. 84483. I am the principal of the Law Office of Carol A. Sobel, located at 2632 Wilshire Boulevard, #552, Santa Monica, California 90403. I am one of the attorneys of record for Plaintiffs in this action and have been designated, with co-counsel, as Class Counsel for the certified Class. I make this declaration in support of Plaintiffs' Motion for Approval of Class Notice and in support of Plaintiffs' request that the Law Office of Carol A. Sobel be appointed as Class Administrator. The matters set forth below are true of my own personal knowledge except where stated on information and belief, and as to those, I am informed and believe them to be true. If called as a witness, I could and would testify competently to them.

2. I have served as Class Administrator in multiple class actions, the great majority involving dispersed classes of protesters, arrestees, and other groups. In about half of these, the putative class members were not discernable from a centralized roster of arrestees. Even where there was such a roster, as in the Occupy protest at Los Angeles City Hall in 2010 and the George Floyd Black Lives Matter protests in 2020, the contact information for many of the class members was out of date. That fact pattern—discrete, dispersed groups assembled around a single event or course of conduct—is precisely the configuration presented here, and it is a configuration my office has administered repeatedly with results well above what commercial class administrators have achieved in comparable matters. In most of these cases, we reached a participation rate of 60 percent or higher. In the Occupy case, we were able to locate all of the putative class members using social media and skip-trace sources. More detail about the specific cases is in the following paragraphs.

3. *Aichele v. City of Los Angeles*, Case No. 2:12-cv-10863-DMG-FFM (C.D. Cal.). My office assisted with outreach in the class settlement in *Aichele*, a civil rights class action arising out of the LAPD's mass arrest of approximately 300 Occupy-LA protesters. Through targeted non-traditional outreach, my office achieved a participation rate of nearly 100 percent—an exceptional result in a mass-arrest class. In *Aichele*, approximately \$50,000 was allocated for an outside firm to administer the claims. However, that firm did not reach more than half of the putative class

1 members. The remaining nearly 50 percent was done by my office without compensation. The
2 administration of the Aichele class by a commercial administration company cost more than twice
3 what my office charged to administer the 2025 settlement in *Black Lives Matter v. City of Santa*
4 *Monica, infra*.

5 4. *Chua v. City of Los Angeles*, Case No. 2:16-cv-00237-JAK-GJS (C.D. Cal.). I
6 administered the class settlement in Chua, a civil rights class action on behalf of approximately 158
7 people arrested during a 2014 protest in Los Angeles against the police killing of Michael Brown
8 in Ferguson, Missouri. In Chua, my office achieved a participation rate of approximately 80 percent.
9 As in Aichele, my office's administrative fee was a small fraction of what a commercial
10 administrator would have charged.

11 5. *Cooley v. City of Los Angeles*, Case No. 2:18-cv-09053-CAS-PLA (C.D. Cal.). I
12 administered the class settlement in Cooley, a civil rights class action on behalf of approximately
13 75 unhoused persons in the Venice area of Los Angeles whose property was seized and destroyed.
14 Despite the considerable difficulty of reaching unhoused class members, my office achieved a
15 participation rate of approximately 50 percent—an excellent result given the lack of a permanent
16 address for nearly all of the putative class members.

17 6. *Black Lives Matter v. City of Santa Monica*, Case No. 2:21-cv-05253-CAS-AFMx
18 (C.D. Cal.). After my appointment as Class Administrator, my office was assigned to administer
19 the class settlement in this protest-related civil rights class action. In addition to contracting for
20 court-ordered skip-trace updates, my office applied the same non-traditional outreach methodology
21 as in the other cases to maximize class participation.

22 7. *Olsen, et al. v. City of Stanton*, Case No. 30-2020-01169774-CU-CR-CXC (Orange
23 County Superior Court). my served as Class Administrator in Olsen, a state-court civil rights class
24 action for the seizure and destruction of the property of unhoused persons and the arrest of
25 approximately 12 individuals during the course of the property confiscation. Working with our co-
26 counsel at the Elder Law & Disability Rights Center, a non-profit in Orange Country, we achieved
27 a participation rate of 100 percent.

28 8. Across each of these matters, my office has refined a methodology specifically

1 suited to the small, dispersed, organizationally-anchored classes that protest civil rights cases
2 produce. The methodology rests on three principles. First, commercial class administrators are far
3 less successful in this kind of case because they rely on stale citation addresses, mass-mailing to
4 those addresses, and publication notice in newspapers that the targeted population does not read. In
5 my experience, more than half of the contact information on police citations is incorrect or stale—
6 addresses that no longer exist, dates of birth listed as 2020, misspellings, illegibility and other
7 obvious data-entry errors—such that a traditional administrator's notice plan produces low
8 participation. For example, more than 50 percent (150) of the initial mailing to putative class
9 members in the *Black Lives Matter* settlement was returned as undeliverable.

10 9. Second, the a significant percentage of the popultions involved in protest cases are
11 reachable, but they are reachable through their organizational and social networks rather than
12 through newsprint or traditional mailings. Over many decades of litigating protest cases in Los
13 Angeles, my office has developed working relationships with the activist organizations whose
14 members make up these classes; postings on those organizations' channels reach more members of
15 the relevant population than any newspaper publication. Third, careful investigative work to
16 identify and update contact information for putative class members—work that commercial
17 administrators routinely decline to do—produces large gains in deliverability and participation.

18 9. The Law Office of Carol A. Sobel will serve as Class Administrator while
19 continuing as one of the firms representing the Class. The dual role is well recognized in this kind
20 of case and was the structure used in Aichele, Chua, Cooley, the Black Lives Matter Santa Monica
21 matter, and Olsen. Combining counsel and administrator roles in a small protest class produces
22 material cost savings to the Class and the parties: the same office that already maintains the
23 investigative file, witness lists, and organizational contacts needed to identify Class members is the
24 office best positioned to deliver notice to them. There is no conflict of interest in the dual role here,
25 where Class Counsel's interest aligns with the Class's interest in maximizing reach and participation.

26 10. The Law Office of Carol A. Sobel has the experience and specific resources required
27 to administer a class of this size. Every interested party benefits from this arrangement, including
28 defendants who will ultimately save as my office will utilize administrative staff for the majority

1 of the work, who will bill at a rate far below the standard rate for a third-party firm.

2 11. The notice plan I propose is designed to provide the best notice practicable under
3 the circumstances of this case. Class Counsel has compiled, and has substantially completed, a list
4 of identified Class members through (a) interviews with the named Plaintiffs; (b) chained-referral
5 interviews with the individuals identified by Plaintiffs, asking each in turn to identify additional
6 persons recalled being present; and (c) supplemental review of body-worn camera video produced
7 in discovery. Direct individual notice to each person on the list is the primary component of the
8 plan. The plan also includes a digital, social-media, earned-media, community-outreach, and
9 publication campaign designed to reach any Class members who are not on the identified list.

10 12. Direct individual notice. The Law Office of Carol A. Sobel, as Class Administrator,
11 will compile a notice database from the list of identified Class members; will verify and supplement
12 addresses using publicly available records, and—consistent with my practice in prior protest
13 cases—targeted investigative work where addresses appear stale. We will send the Long-Form
14 Notice by first-class mail and, where available, by email to each identified Class member. Returned
15 mail will be researched, readdressed and remailed.

16 13. Digital and social-media outreach. My office will conduct a digital campaign across
17 various social media outlets, with demographic targeting consistent with the demographics of
18 December 6, 2020 protest participants.. Consistent with the methodology in Aichele, Chua, Cooley,
19 and Black Lives Matter v. Santa Monica, the campaign will primarily consist of direct postings by
20 and through the activist-organization channels with which my office has working relationships.

21 14. We will also issue press releases concerning the settlement and the available of
22 damages for putative class members.

23 15. Community-organization outreach. The Long-Form Notice will be distributed to
24 civil rights and civil liberties organizations with a Los Angeles County presence (including
25 CANGRESS (dba Los Angeles Community Action Network “LA CAN”) and BLMLA's affiliated
26 networks) with a request that those organizations post the Notice on their websites and circulate it
27 to their memberships.

28 16. Case website and toll-free telephone line. my office will establish a dedicated case

1 website containing the Long-Form Notice, a copy of the Court's certification ruling, frequently
2 asked questions, contact information, and an electronic Request for Exclusion form. I will also
3 establish a toll-free telephone line staffed by trained personnel during normal business hours.

4 17. Timing of dissemination, opt-out, and filing of exclusion list. I propose the following
5 timing: (a) The Class Administrator shall commence dissemination within fourteen (14) days of
6 entry of the Order approving notice and shall substantially complete dissemination within sixty (60)
7 days of the Notice Date. The "Notice Date" shall be the first date on which the Long-Form Notice
8 or Summary Notice is disseminated. (b) The Exclusion Period shall be one hundred twenty (120)
9 days from the Notice Date. (c) Within thirty (30) days after the close of the Exclusion Period, the
10 Class Administrator shall file with the Court a list of all timely-submitted Requests for Exclusion.

11 18. Cost estimate. Because the Law Office of Carol A. Sobel will serve as Class
12 Administrator in conjunction with its existing role as Class Counsel, I anticipate that the
13 administrative fee for this matter will be substantially below the fee a commercial class
14 administrator would charge for the same scope of work, consistent with my prior administration of
15 Aichele, Chua, Cooley, the Santa Monica matter, and Olsen. A more detailed cost breakdown is
16 attached as Exhibit 2.

17 19. Taking the proposed notice components together, and based on the participation
18 rates achieved in my prior administration of comparable protest classes -- almost 100 percent in
19 Aichele; approximately 80 percent in Chua; 66 percent in the Santa Monica Black Lives Matter
20 case; 100 percent in the unhoused-persons class in Olsen --, I expect the proposed plan to deliver
21 direct notice to a substantial majority of identifiable Class members and to achieve a participation
22 rate mirroring the rates achieved in Aichele and Chua.

23 20. Conclusion. In my professional opinion, the notice plan described above is the best
24 notice practicable under the circumstances of this case and is reasonably calculated to apprise
25 members of the certified Class of the pendency of the action and their rights.

26
27 I declare under penalty of perjury under the laws of the State of California that the foregoing is
28 true and correct.

1 Executed on June 9th, 2026, at Santa Monica, California.

2 *Carol A. Sobel*

3 Carol A. Sobel
4 Class Counsel and Proposed Class Administrator
5 Law Office of Carol A. Sobel
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EXHIBIT A

**NOTICE OF PENDENCY OF CLASS ACTION
AND OF YOUR RIGHT TO BE EXCLUDED**

Greg Akili, et al. v. City of Los Angeles, et al.

Los Angeles County Superior Court Case No. 22STCV00934

Hon. Theresa M. Traber, Department 1

The Superior Court of California for the County of Los Angeles authorized this Notice.

This is not a solicitation. You are not being sued.

Please read this Notice carefully.

A court has decided that this case may proceed as a class action on behalf of a group of people that may include you. This Notice explains what the case is about, what your rights are, and what you must do if you do not want to be included in the class.

1. WHY YOU RECEIVED THIS NOTICE.

You are receiving this Notice because records or information available to Class Counsel or the Notice Administrator indicate that you may be a member of the certified Class in the lawsuit Greg Akili, et al. v. City of Los Angeles, et al., Los Angeles County Superior Court Case No. 22STCV00934. You may also have learned about the case through publication, social media, or community outreach. If you fall within the Class definition below, this Notice affects your legal rights, regardless of how you received it.

2. WHO IS IN THE CLASS.

On March 24, 2026, the Court certified the following Class:

All individuals who were present at the public assembly at the Mayor's residence between 9:15 a.m. and 10:00 a.m. on December 6, 2020, and who (i) left the protest following an unannounced deployment of LAPD officers into the public assembly and/or an LAPD dispersal order, and/or (ii) were subjected to physical force by LAPD officers, including but not limited to baton strikes, physical blows, shoving, or being knocked to the ground.

The "Mayor's residence" refers to the Getty House, the official residence of the Mayor of Los Angeles. The protest at issue took place outside the Getty House on the morning of December 6, 2020.

If you were at the protest during that time period, and you either left after LAPD officers deployed into the assembly or after a dispersal order, or you were struck, shoved, or knocked down by LAPD officers, you are likely a member of the Class. If you are not sure, you may contact Class Counsel or the Notice Administrator at the addresses below.

3. WHAT THE CASE IS ABOUT.

The Plaintiffs are Greg Akili, Black Lives Matter Los Angeles, Shannon Thomas, and Emily Allers. They sued the City of Los Angeles, Lieutenant Carlos Figueroa, Captain Warner Castillo, Officer Daniel Orlik, and Officer Brittany Primo (the "Defendants").

Plaintiffs allege that on December 6, 2020, the Los Angeles Police Department deployed officers in riot gear into a peaceful protest outside the Mayor's residence in order to provoke a confrontation, then used that confrontation as a pretext to declare an unlawful assembly, order the protest dispersed, and use physical force—including baton strikes, shoving, and knocking people to the ground—against people who were peacefully exercising their rights to assembly and free speech. Plaintiffs claim that this conduct violated the protesters' rights under the United States and California Constitutions and California's Bane Act (Civ. Code, § 52.1), among other laws. Plaintiffs seek damages and other relief on behalf of themselves and the Class.

Defendants deny these allegations. Defendants contend that LAPD's actions were lawful and reasonable responses to conduct at the protest, that any dispersal order was justified, and that any use of force was objectively reasonable under the circumstances. Defendants deny that they violated the Constitution or any other law and deny that Plaintiffs or the Class are entitled to any recovery.

The Court has not decided whether Plaintiffs or Defendants are right. The Court has only decided that the case can proceed as a class action.

4. WHAT IT MEANS TO BE IN THE CLASS.

If you are a Class member and you do nothing, you will remain in the Class. You will be represented by the Plaintiffs and Class Counsel identified below. If the Class wins, you may be entitled to a share of any damages or other relief that the Court awards. If the Class loses, you will be bound by the Court's judgment and you will not be able to sue the Defendants on your own for the claims that are part of this case.

You will not have to pay any fees or costs out of pocket to remain in the Class. Class Counsel are handling the case on a contingency basis and will ask the Court to award attorneys' fees and costs from any recovery, if there is one. The Court will decide whether and how much to award.

5. YOUR RIGHTS AS A CLASS MEMBER.

As a Class member, you have the following rights:

A. Stay in the Class. You do not need to do anything to stay in the Class. You will automatically be included if you fall within the Class definition. You will be bound by any judgment, whether favorable or unfavorable, and you may share in any recovery.

B. Exclude yourself ("opt out"). You may exclude yourself from the Class. If you opt out, you will not be bound by the judgment in this case, and you will keep any right you may have to sue the Defendants individually for the claims at issue. You will not, however, share in any recovery the Class may obtain in this lawsuit. To opt out, follow the instructions in Section 6.

C. Enter an appearance through your own attorney. If you do not opt out, you may, if you wish, enter an appearance through your own attorney at your own expense. You are not required to do so. Class Counsel will continue to represent the Class.

D. Object. You may, with or without your own attorney, object to any aspect of how the case is being handled if you do not opt out. Objections will be considered by the Court at any hearing for which notice is given.

6. HOW TO EXCLUDE YOURSELF FROM THE CLASS.

If you do not want to be a Class member, you must submit a written, signed Request for Exclusion. The Request for Exclusion must include all of the following:

- Your full name;
- Your current mailing address;
- A telephone number or email address where you can be reached;
- The case name and number: Greg Akili, et al. v. City of Los Angeles, et al., Los Angeles County Superior Court Case No. 22STCV00934; and
- A clear statement that you wish to be excluded from the Class, such as: "I request to be excluded from the Class in the Akili v. City of Los Angeles class action."

Send the Request for Exclusion to the Class Administrator at the address below, by mail (postmarked no later than the deadline) or by email. You may also submit an electronic Request for Exclusion through the case website listed in Section 9.

**Akili Class Administrator
c/o Law Office of Carol A. Sobel
2632 Wilshire Blvd, # 552
Santa Monica, CA 90403-4623
(424) 744-8703**

DEADLINE: Your Request for Exclusion must be postmarked or electronically submitted no later than 11:59 p.m. Pacific time on [DATE — one hundred twenty (120) days after the date this Notice is first disseminated]. Requests received after this deadline will not be honored unless the Court orders otherwise.

If you opt out, you will not receive any money or other benefit if the Class wins this case, but you will keep your right to bring your own lawsuit against the Defendants for the same claims, subject to applicable statutes of limitation. If you have not already filed an individual lawsuit, you should consult with an attorney promptly about the deadlines that apply to your potential claims.

7. ENTERING AN APPEARANCE THROUGH YOUR OWN COUNSEL.

If you remain in the Class and you wish to be represented by your own attorney in addition to Class Counsel, you or your attorney may enter an appearance in the case. You will be responsible for your own attorney's fees and costs. You are not required to hire your own attorney; Class Counsel will represent the Class.

8. THE STATUS OF THE CASE.

The Court has not decided the merits of the case. The Court has only decided that the case can proceed as a class action and that the persons described in Section 2 are members of the Class. The Plaintiffs must still prove their claims at trial or by motion. The Defendants will have the opportunity to present their defenses. There is no guarantee that the Class will recover anything.

9. WHO TO CONTACT FOR MORE INFORMATION.

Do not call the Court. The Court cannot give you legal advice or answer questions about the case.

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NOTICE ADMINISTRATOR:

Akili Class Administrator
c/o Law Office of Carol A. Sobel
2632 Wilshire Blvd, # 552
Santa Monica, CA 90403-4623
Toll-free: (424) 744-8703
Email: [exclusions@\[case-website\].com](mailto:exclusions@[case-website].com)
Website: [www.\[case-website\].com](http://www.[case-website].com)

— *END OF NOTICE* —

EXHIBIT B

LEGAL NOTICE

A Los Angeles Court has certified a class action that may include you.

Akili v. City of Los Angeles, Case No. 22STCV00934

Los Angeles County Superior Court — Hon. Theresa M. Traber

Why you received this notice

A court has certified a class action. Information available to Class Counsel suggests you may be a Class member. This notice affects your legal rights. Read it carefully.

Who is in the Class

All individuals who were present at the public assembly outside the Mayor's residence (Getty House) between 9:15 a.m. and 10:00 a.m. on December 6, 2020, and who EITHER:

- left the protest after LAPD officers deployed into the crowd or after a dispersal order, OR
- were struck, shoved, or knocked to the ground by LAPD officers.

What the case is about

Plaintiffs claim that the LAPD violated their constitutional rights by deploying officers in riot gear into a peaceful protest, declaring an unlawful assembly, and using force on demonstrators. The City denies liability and contends its officers acted lawfully and reasonably. The Court has not decided who is right.

Your options

- **Do nothing.** Stay in the Class. You will be bound by the judgment, win or lose, and may share in any recovery. You do not need to do anything.
- **Opt out.** Exclude yourself. You will not share in any recovery, but you will keep your right to bring your own lawsuit (subject to applicable legal deadlines).

Deadline to opt out

Your written, signed Request for Exclusion must be postmarked or electronically submitted by [DATE — 120 days after the Notice Date]. Include your name, address, phone or email, the case name and number, and a statement that you wish to be excluded from the Class.

Mail Requests for Exclusion to:

Akili Class Administrator

c/o Law Office of Carol A. Sobel

2632 Wilshire Blvd, # 552

Santa Monica, CA 90403-4623

To learn more or to opt out online

Read the full Long-Form Notice, see frequently asked questions, and download or submit a Request for Exclusion at:

Website: _____

Toll-free: (424) 744-8703

This notice was authorized by the Superior Court of California, County of Los Angeles.

Do not call the Court. The Court cannot answer questions about the case.

EXHIBIT C

EXHIBIT 2**STATEMENT OF PROJECTED CLASS ADMINISTRATION HOURS AND EXPENSES***Greg Akili, et al. v. City of Los Angeles, et al.**Los Angeles County Superior Court Case No. 22STCV00934*

The following statement sets forth the Class Administrator's projection of the hours and out-of-pocket expenses required to administer the Class in this matter. Hours are billed at a blended rate of \$100 per hour, covering all attorney, paralegal, and administrative staff time. The blended rate is materially below the rates that would be charged by a commercial class administrator for the same scope of work and reflects the dual-role efficiencies described in paragraphs 9 and 19 of the Declaration of Carol A. Sobel.

Out-of-pocket expenses reflect the hard costs of postage, address-update services, third-party website hosting, telecommunications, and similar pass-through items, billed at actual cost without markup.

Task	Hours	Labor (Hours × \$100)	Expenses	Subtotal
Project Management	18.0	\$1,800	—	\$1,800
Data & Cyber Security	3.0	\$300	—	\$300
Printing & Mailing	7.5	\$750	\$450	\$1,200
Skip Tracing	5.0	\$500	\$1,000	\$1,500
Video Verification	5.0	\$500	—	\$500
Website and intake	5.0	\$500	\$200	\$700
Search	5.0	\$500	\$50	\$550
Call Center	10.0	\$1,000	\$250	\$1,250
Opt-out Tracking	2.0	\$200	—	\$200
Close-out Declarations	6.0	\$600	—	\$600
1099 forms	20.0	\$2,000	\$500	\$2,500
TOTAL	86.5	\$8,650	\$2,450	\$11,100

Notes on Each Line Item.

Project Management — 18.0 hrs / \$1,800 labor / \$0 expenses. Time of the Class Administrator and supporting staff to oversee the dissemination plan, coordinate with vendors, supervise mail and digital outreach, supervise call-center handling, supervise close-out reporting

Exhibit C

to the Court, and serve as the responsible point of contact for questions from the Court and the parties throughout the dissemination and Exclusion Period.

Data and Cyber Security — 3.0 hrs / \$300 labor / \$0 expenses. Compilation and maintenance of the notice database from the Counsel-prepared identification list; deduplication; address-format normalization; and ongoing data hygiene during the dissemination period.

Printing & Mailing — 7.5 hrs / \$750 labor / \$450 expenses. Three and a Half hours of staff time to prepare the mail merge and oversee production. The \$450 expense covers paper, envelopes, and first-class postage for the identified-member list.

Skip Tracing — 5.0 hrs / \$500 labor / \$1,000 expenses. Skip-tracing services for a class of this kind are driven primarily by the cost of the third-party services themselves rather than by staff time. The \$1,000 expense covers third-party skip-tracing service fees, queries, and ancillary address-update services, billed at actual cost. The 5.0 hours of staff time covers running the queries, reviewing the output, and filtering the returns into usable contact records.

Video Verification — 5.0 hrs / \$500 labor / \$0 expenses. Verification of identified Class members against the body-worn video produced in discovery. The same body-worn video that was used during the chained-referral identification process described in paragraph 11 of the Sobel Declaration will be reviewed at the notice stage to verify each member of the identified-member list and to spot any additional individuals visible in the footage who should be added to the list before notice is mailed.

Website and Intake — 5.0 hrs / \$500 labor / \$200 expenses. Static website design and hosting are inexpensive; the cost of this line item is staff time, not third-party fees. For the actual website staff time covers specifying the site, drafting FAQ content, populating the document library, configuring the electronic Request for Exclusion form, and maintaining and updating the site through the dissemination and Exclusion Period. The \$200 expense covers domain registration and hosting at actual cost. Fees in this category also encompass the coordinated processes required to identify, locate, and communicate with class members, including data intake and management, and operation of a centralized platform for dissemination of notice and receipt of responses. Given the limited class size, these activities were performed as a unified workflow to ensure efficient and effective delivery of notice, avoid duplication of effort, and maintain consistent tracking and reporting of class member communications.

Search — 5.0 hrs / \$500 labor / \$50 expenses. comprehensive online investigation and due diligence using social media platforms, public record databases, and various digital sources to identify, vet, and locate potential class members and witnesses. The expenses represent the subscription to services that facilitate the social media search process.

Call Center — 13.0 hrs / \$1,300 labor / \$250 expenses. The Law Office of Carol A. Sobel maintains a dedicated incoming telephone line used in matters of this kind. The hard cost of the line is approximately \$50 per month and the line is already in service; the \$250 expense reflects the marginal cost of the line across the approximately five-month period of performance, billed

at actual cost. The labor estimate reflects the staff time required to actually field calls and communicate with Class members, a substantial activity in a protest class where direct telephone outreach is one of the most effective channels for reaching the population.

Opt-out Tracking — 2.0 hrs / \$200 labor / \$0 expenses. Two hours of administrative time to receive, time-stamp, and log Requests for Exclusion as they arrive, and to generate the exclusion list spreadsheet for filing with the Court. The work is primarily administrative and spreadsheet-generation; the volume of incoming requests is expected to be low.

Close-out Declarations — 6.0 hrs / \$600 labor / \$0 expenses. Approximately three staff members will each prepare a close-out declaration documenting the portion of administration work he or she personally performed (e.g., mailing and skip-tracing; call-center and outreach; opt-out tracking and document filing). Each declaration is estimated at approximately ninety minutes to two hours.

1099 Reporting Administration— 20.0 hrs / \$2000 labor / \$500 expenses Regulatory tax reporting and compliance fees associated with the generation and issuance of IRS Form 1099s to claimants as required by federal law for the distribution of settlement proceeds.

True-Up. The figures above are projections. The Class Administrator will bill the Class at \$100 per hour for actual time recorded contemporaneously, and at actual cost for out-of-pocket expenses without markup. If actual hours and expenses fall below the projected total, the Class will be charged only the lower amount. If actual hours or expenses materially exceed the projection, the Class Administrator will report the variance to the Court before submitting any request to recover the excess.

Comparator. A commercial class administration firm engaged for a notice campaign of comparable scope and duration would typically quote a fee in the range of \$30,000 to \$40,000, often as a flat expense. Or to the expenses and labor are broken down often there is blending paralegal time at \$150–\$250 per hour with project-manager time at \$300–\$400 per hour and adding markup on third-party expenses. The estimate set forth above is materially lower because (a) Class Counsel has already compiled the substantially complete identified-member list described in paragraphs 4 and 11 of the Sobel Declaration; (b) the Law Office of Carol A. Sobel will bill all roles at a single blended \$100 hourly rate; (c) the Sobel firm's existing experience administering these complicated class actions allows a leaner projection because there is less about the process that is unknown, whereas a class administration firm that typically does employment class actions would overestimate in order to provide more runway for the unknown.