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8	UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA					
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10	LOUDAKED individually and an	Case No.: 14-cv-2129-MMA-AGS				
11	LOU BAKER, individually and on behalf of all others similarly situated,	CLASS ACTION				
12	Plaintiff,	SUPPLEMENTAL				
13	v.	DECLARATION OF ED BARRERO REGARDING:				
14 15	SEAWORLD ENTERTAINMENT, INC., et al.,	(A) MAILING OF POSTCARD NOTICE AND NOTICE;				
15	Defendants.	(B) UPDATE ON CALL CENTER SERVICES AND SETTLEMENT				
17		WEBSITE; AND (C) REPORT ON CLAIMS RECEIVED TO DATE				
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27	SUDDI EMENITAL DECLADATION OF FD	RARRERO REV (A) MAILING OF POSTCARD NOTICE				
28	SUPPLEMENTAL DECLARATION OF ED BARRERO RE: (A) MAILING OF POSTCARD NOTIC AND NOTICE; (B) UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITI AND (C) REPORT ON CLAIMS RECEIVED TO DAT Case No. 14-cv-2129-MMA-AG 1					

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I, Ed Barrero, declare and state as follows, pursuant to 28 U.S.C. § 1746:

I am a Senior Project Manager employed by Epiq Class Action & 1. 2 3 Claims Solutions, Inc. ("Epiq"). Pursuant to the Court's Order Granting Class Representatives' Unopposed Motion for Preliminary Approval of Class Action 4 5 Settlement and Authorizing Dissemination of Notice of the Settlement to the Class entered on February 19, 2020 (ECF No. 518), Class Counsel were authorized to 6 retain Epiq in connection with the proposed Settlement of the Action.¹ I submit this 7 Declaration as a supplement to my previously filed declaration, the Declaration of 8 Ed Barrero Regarding: (A) Mailing of Postcard Notice and Notice; (B) Posting of 9 Notice and Claim Form on Settlement Website; and (C) Publication of Summary 10 Notice dated June 16, 2020 (ECF No. 523-3) (the "Initial Mailing Declaration"). The 11 12 following statements are based on my personal knowledge and information provided 13 to me by other Epiq employees working under my supervision and, if called on to do so, I could and would testify competently thereto. 14

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CONTINUED DISSEMINATION OF NOTICE

16 2. Since the execution of my Initial Mailing Declaration, Epiq has mailed 225 additional copies of the Notice and Claim Form (together, the "Notice Packet") 17 18 in response to requests from potential Class Members. Epiq has not received any additional requests for Postcard Notices. Therefore, through July 13, 2020, Epig has 19 mailed a total of 16,597 Postcard Notices and 4,469 Notice Packets to potential Class 20 21 Members and nominees.

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²⁵ Unless otherwise defined herein, all capitalized terms shall have the same meanings as set forth in the Stipulation and Agreement of Settlement dated February 26 10, 2020 (ECF No. 516-3). 27

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UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE

3 3. Epiq continues to maintain the toll-free telephone number, (877) 893-2672, and Interactive Voice Recording ("IVR") to accommodate inquiries from 4 5 potential Class Members. Epiq also continues to maintain the dedicated Settlement Website, www.SeaWorldSecuritiesLitigation.com, to assist Class Members. On 6 June 18, 2020, Epiq posted to the Settlement Website copies of the papers filed in 7 8 support of Class Representatives' motion for final approval of the Settlement and 9 Plan of Allocation and Class Counsel's motion for an award of attorneys' fees and 10 Litigation Expenses. On July 14, 2020, Epig posted to the Settlement Website the 11 Court's Order and Notice of Procedure for July 22, 2020, 10 a.m. PST Settlement Fairness Hearing and Notice of Dial In Instructions (ECF Nos. 525 & 526) informing 12 13 Class Members that the July 22, 2020 Settlement Fairness Hearing will be held by 14 teleconference and advising of the procedures for participating in the teleconference. Epiq will continue operating, maintaining and, as appropriate, updating the 15 Settlement Website and toll-free telephone number until the conclusion of this 16 administration. 17

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CLAIMS RECEIVED TO DATE

19 4. The notices and Claim Form informed potential Class Members that if 20they wished to be eligible to receive a distribution from the Settlement they must submit a Claim Form to Epiq, with supporting documentation, postmarked, if 21 22 mailed, or received online, on or before July 16, 2020. Through July 13, 2020, Epiq has received approximately 1,297 Claim Forms.² It is Epiq's experience that a large 23 number of claims (especially those from third party filers) are submitted just prior 24 25

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This number is preliminary at this point and subject to change, and is not intended to be construed as a final timely claim count.

SUPPLEMENTAL DECLARATION OF ED BARRERO RE: (A) MAILING OF POSTCARD NOTICE AND NOTICE; (B) UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE; AND (C) REPORT ON CLAIMS RECEIVED TO DATE CASE NO. 14-cv-2129-MMA-AGS to or on the claims submission deadline. Accordingly, Epiq anticipates receiving
 additional claims for this matter in the coming days.

5. In connection with Class Counsel's motion for distribution of the Net
Settlement Fund, Epiq will provide the Court with the results of this administration,
including the total number of Claim Forms received and the total recognized losses
represented by those claims.

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

10 Executed on July 14, 2020, at Lake Success, NY.

Ed Gameri

Ed Barrero

SUPPLEMENTAL DECLARATION OF ED BARRERO RE: (A) MAILING OF POSTCARD NOTICE AND NOTICE; (B) UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE; AND (C) REPORT ON CLAIMS RECEIVED TO DATE CASE NO. 14-cv-2129-MMA-AGS