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and all others similarly situated*

[Additional counsel listed on following page]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

LAUREN DANN, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

THE RODAN + FIELDS COMPANY, RODAN
+ FIELDS LLC, DR. KATIE RODAN, DR.
KATHY FIELDS, DIMITRI HALOULOS, TIM
ENG, LAURA BEITLER, DALIA
STODDARD, JESSICA RAEFIELD, JANINE
WEBER, and DOES 1-100

Defendants.

Case No.: CGC-24-612800

CLASS ACTION

*Assigned for all purposes to: Hon. Jeffrey S.
Ross, Dept. 606*

**DECLARATION OF ANNETTE
KASHKARIAN**

[Filed concurrently with Plaintiffs' Notice of
Motion and Motion for Preliminary Approval,
Declarations of Lauren Dann, Kathryn Cude,
and Mary Yoon in Support of Plaintiffs'
Motion for Preliminary Approval of Class
Action Settlement and [Proposed] Order
Granting Motion]

PRELIMINARY APPROVAL HEARING

Date: June 2, 2025
Time: 9:00 a.m.
Dept: 606

Complaint filed: March 1, 2024
FAC filed: May 14, 2024

ELECTRONICALLY
FILED

Superior Court of California,
County of San Francisco

05/07/2025
Clerk of the Court
BY: MADONNA CARANTO
Deputy Clerk

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14 *Attorneys for Plaintiff Lauren Dann*

15 *and all others similarly situated*

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5 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
6 **FOR THE COUNTY OF SAN FRANCISCO**

7 LAUREN DANN, individually and on
8 behalf of all others similarly situated,

9 Plaintiffs,

10 vs.

11 THE RODAN + FIELDS COMPANY,
12 RODAN + FIELDS LLC, DR. KATIE
13 RODAN, DR. KATHY FIELDS, DIMITRI
14 HALOULOS, TIM ENG, LAURA
15 BEITLER, DALIA STODDARD, JESSICA
16 RAEFIELD, JANINE WEBER, and DOES
1-100

17 Defendants.

Case No.: CGC-24-612800

CLASS ACTION

Assigned for all purposes to:
Hon. Jeffrey S. Ross, Dept. 606

**DECLARATION OF ANNETTE
KASHKARIAN**

PRELIMINARY APPROVAL HEARING

Date: June 2, 2025

Time: 9:00 a.m.

Dept: 606

Complaint filed: March 1, 2024

FAC filed: May 14, 2024

17 I, ANNETTE KASHKARIAN, declare and state as follows:

18 1. I am a Director with KCC Class Action Services, LLC dba Verita (“Verita”) and I
19 reside in Los Angeles, California.

20 2. I have personal knowledge of the matters set forth herein.

21 **RELEVANT EXPERIENCE**

22 3. Verita specializes in comprehensive class action services, including legal
23 notification, email and postal mailing campaign implementation, website design, call center
24 support, class member data management, claims processing, check and voucher disbursements, tax
25 reporting, settlement fund escrow and reporting, and other related services critical to the effective
26 administration of class action settlements. With more than 30 years of industry experience, Verita
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1 has developed efficient, secure, and cost-effective methods to effectively manage the voluminous
2 data and mailings associated with the noticing, claims processing and disbursement requirements
3 of these matters to ensure the orderly and fair treatment of class members and all parties in interest.

4 4. As an industry leader, Verita has been retained to administer more than 7,500 class
5 actions and distributed settlement payments totaling well over a trillion dollars in assets. Our
6 experience includes many of the largest and most complex administrations of both private litigation
7 and of actions brought by state and federal government regulators. As such, we are familiar with,
8 and guided by, Constitutional due process provisions, the Federal Rules of Civil Procedure, and
9 relevant case law relating to legal notification.
10

11 5. The purpose of this declaration is to provide information related to Verita's
12 qualifications and experience, as well as to detail the proposed notice plan (the "Notice Plan" or
13 "Notice Program") designed to provide notice to California residents for this litigation.
14

15 **DATA SECURITY**

16 6. Due to the nature of the services Verita provides, data security is of the utmost
17 importance. As such, Verita continually makes sizeable investments designed to protect
18 information and IT assets. Verita has developed a comprehensive global information and
19 cybersecurity framework aligned to National Institute of Standards and Technology (NIST)
20 frameworks, ISO 27001 and ISO 27002. Among other things, this framework and its underlying
21 controls are designed to ensure that Verita's information and systems are only available to
22 authorized individuals with a justified business need, information is not disclosed or modified
23 without authorization, applicable regulatory, legislative and client requirements are met, and
24 suspected security weaknesses are reported, investigated, documented and resolved. Verita's
25 information security framework is reviewed on an annual basis and communicated to employees
26 through a comprehensive training program.
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1 7. Verita employees are subject to screening processes prior to employment and are
2 subject to confidentiality agreements as part of their standard employment terms. Mandatory
3 training ensures that employees have the necessary resources to maintain Verita's position on
4 information security and are aware of their responsibilities as related to their job function.

5 8. Verita acts as a data processor and will receive data transfers through secure File
6 Transfer Protocol ("SFTP"). The SFTP File Gateway will have a user login and password for
7 access. Once Verita receives the files, the data will be reviewed for size and record count and
8 removed from the FTP File Gateway.

9 9. Verita only collects the necessary personally identifiable information to administer
10 the settlement and will retain all records only as long as necessary as prescribed by applicable law,
11 court documents, and client agreements.

12 10. Once data is in Verita's possession, Verita operates on the principle of "least
13 privilege" for access control. All Verita employees are assigned unique IDs and are required to
14 select and manage their passwords in line with Verita's rigorous password policies. The use of
15 privileged accounts is strictly controlled and restricted to system administration and maintenance
16 activities only. Additionally, Verita employs multifactor authentication for access to its networks
17 and data.

18 11. Verita utilizes cryptographic solutions to protect data in transit and at rest. Network
19 and wireless networks use industry-recognized leading practices to implement strong encryption
20 for authentication and transmission, commensurate with the sensitivity of the data being
21 transmitted. Mobile computing devices such as smartphones and laptops are encrypted.

22 12. Verita office locations are protected against unauthorized physical access through
23 the use of physical and electronic access control systems, manned reception desks, and
24 CCTV. Access to critical information processing locations is strictly controlled and restricted to
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1 pre-authorized individuals only. Access is logged and access rights are reviewed on a regular
2 basis.

3 13. Verita's secure environment provides comprehensive disaster recovery and
4 resiliency features to ensure business continuity and data protection. Utilizing features such as
5 secure backup, site recovery and distribution of services across multiple geographic locations to
6 safeguard against regional and other failures, Verita is able to maintain high availability, minimize
7 downtime and ensure data integrity during unexpected events.

9 14. Verita has risk-based processes to respond to information security incidents, unusual
10 or suspicious events and breaches of policies. The information security incident management
11 processes are designed to contain and control the incident, reduce any potential impact to the
12 business, identify and investigate the root cause and implement corrective actions to reduce the risk
13 of recurrence.

15 15. Effective fraud prevention is an end-to-end process in today's class action
16 administrations. At the time of filing, our websites utilize industry leading services to prevent
17 fraudulent claims from being filed including, but not limited to, a Web Application Firewall
18 ("WAF") and reCAPTCHA services used to identify and potentially prevent fraudulent claims from
19 being filed. However, in situations where there are unknown class members and the Know Your
20 Customer ("KYC") protocols requiring proof of identity or purchase is limited, Verita's backend
21 data analysis is essential in identifying and removing fraudulent claims. Sophisticated fraudulent
22 filers may be able to circumnavigate the front-end protections on our settlement websites, but
23 struggle to complete claim forms in a unique way. This process includes a comprehensive review
24 of the claim submission, not just for validation of completion under the terms of the settlement, but
25 analyzing how the claim form was submitted, comparing the answers submitted across the entire
26 population for trends in responses to claim form questions, reviewing contact information for
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1 duplication in Names, Addresses, Emails, IP addresses, etc. Any claims suspected of fraud are
2 reported to the parties to determine how they should be treated and eventually adjudicated.

3 16. Verita's services agreement governs the terms and conditions of Verita's
4 employment, including liability and acceptance of responsibility. Verita maintains insurance
5 applicable to its services including professional indemnity insurance, general liability, property,
6 comprehensive crime, electronic and computer crime, and cyber liability insurance.
7

8 *Individual Notice*

9 17. Verita will send an email to all valid email addresses provided in the class data. An
10 email containing a summary of the settlement in the body of the email will be sent to all available
11 email addresses. The Email Notice will be designed to avoid common "red flags" that might
12 otherwise cause spam filters to block or identify the email notice as spam. For example, the notice
13 content will be contained in the body of the email message rather than as an attachment to avoid
14 spam filters maintained by Internet Service Providers. The Email Notice will also contain a
15 hyperlink that, when clicked, will take recipients directly to the landing page of the Settlement
16 Website.
17

18 18. For email notices that result in a bounce back, Verita will send a Long Form Notice
19 via USPS to all class members ("Class Members") with physical addresses. The notice will contain
20 the settlement website address, the toll-free number assigned to this case, and further court details
21 as stipulated in the Settlement Agreement. Prior to mailing, Verita will process the names and email
22 addresses provided in the class data, through the National Change of Address Database ("NCOA")
23 and email cleanse. Through credit bureau and/or other public source databases, Verita will perform
24 address searches for any undeliverable notices to find additional forwarding addresses.
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1 ***Toll-Free Number***

2 22. A toll-free number will be established that will allow persons affected by the
3 settlement to call to learn more about the settlement in the form of frequently asked questions. A
4 voice mail box will be monitored.

5 ***Email Address***

6
7 23. An email address will be established that will allow persons affected by the
8 settlement to email to learn more about the settlement and ask direct questions to customer service
9 representatives.

10 ***P.O. Box***

11 24. A post office box will be established that will allow persons affected by the
12 settlement to write to learn more about the settlement and ask questions.

13 **ADMINISTRATION COSTS**

14
15 25. Verita estimates the costs of notice and settlement administration for this at
16 \$118,610-\$145,199 for a 10-50% claims rate, and has agreed to a 'Not to Exceed' amount of
17 \$150,000. These costs are based upon the scope of work currently contemplated and include tasks
18 such as data intake and processing, purchasing postal and email addresses for direct notice,
19 distributing the email notice, printing and mailing the long form notice, postage, weekly case
20 reporting, setting up and maintaining the settlement website, processing claim forms, processing
21 exclusion requests, curing deficient claims, claim calculations, disbursements and handling, and
22 staff hours (Exhibit A).

23
24 26. The costs of settlement administration are consistent with industry standards and
25 cases of similar size and expected scope. These estimated costs are the product of extensive pre-
26 administration consultation with the parties on the expected scope of work. Notice and settlement
27 administration costs as a general matter are a combination of unitized pricing and hourly rates.
28

1 While Verita can and does project costs based upon input from the parties about the likely
2 engagement, informed by our own past experience, ultimately, we are a neutral third-party
3 administrator tasked with handling any administrative tasks requested and required by the
4 circumstances of the administration, regardless of whether the administration falls within
5 projections or greatly exceeds them. These realities are beyond Verita's control and cannot be
6 altered by Verita to limit the work required.
7

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

10 Executed on May 5, 2025 at Los Angeles, California.
11

12 *Annette Kashkarian*

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ANNETTE KASHKARIAN
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Rodan + Fields Wage & Hour Settlement

Contact: Frank Gatto | 310.647.7828 | fgatto@veritaglobal.com

May 5, 2025

Key Assumptions Used in Estimate Preparation

Class Size (number of members):	42,220
Case Duration (months):	12
Number of Electronic, Finalized Data Files Provided (Excel, Access, etc.):	1
CAFA Notice Required?	No
Claims Processing:	Yes
Address Searches	Yes
% of returned notices to be forwarded:	1%
% of returned undeliverable notices:	10%
% of successful address searches:	90%
Media Campaign Required:	No
Expert Media Services:	No
Translations Required:	No
Number of Email Campaigns:	1
% of emails bounced back ("Bouncebacks"):	20%
Reminder Mailing:	No
Duration of Claims Filing Period:	8 weeks
Business Reply Mail ("BRM" or "pre-paid" postage):	No
Documentation Required to file a claim:	No
% of class members that will file a claim:	10% to 50%
% of claims filed online:	90%
% of claims filed by phone:	0%
% of claims filed by postal mail:	10%
% of claims submitted with Documentation:	0%
% of deficient claims filed by postal mail:	5%
Type of Telephone Support:	Automated
% of class that will call:	1%
% of callers that will punch through to a Live Operator:	0%
% of callers that will request a Notice Packet:	5%
Duration of Telephone Support (months):	12
Type of Website Support:	Dynamic
Online Claims Filing:	Yes
Duration of Website Support (months):	12

Summary of Costs

Estimated Claims Filing Rate:	10%
Estimated # of Claims Filed:	4222
Notice Procedures	\$57,512
Class Member Support	\$8,129
Claims Administration	\$9,251
Disbursements & Tax Reporting	\$50,491
Sub-Total Administration Costs	\$125,382
Plus Estimated Postage*	\$33,228
Total Estimated Cost**	\$158,610
Less Client Courtesy Discount*****	(\$40,000)
Total Estimated Cost, With Discount	\$118,610

Estimated Claims Filing Rate:	25%
Estimated # of Claims Filed:	8444
Notice Procedures	\$57,512
Class Member Support	\$8,129
Claims Administration	\$15,357
Disbursements & Tax Reporting	\$50,491
Sub-Total Administration Costs	\$131,458
Plus Estimated Postage*	\$33,243
Total Estimated Cost**	\$164,701
Less Client Courtesy Discount*****	(\$40,000)
Total Estimated Cost, With Discount	\$124,701

Estimated Claims Filing Rate:	50%
Estimated # of Claims Filed:	21110
Notice Procedures	\$57,512
Class Member Support	\$8,129
Claims Administration	\$34,578
Disbursements & Tax Reporting	\$51,691
Sub-Total Administration Costs	\$151,910
Plus Estimated Postage*	\$33,290
Total Estimated Cost**	\$185,199
Less Client Courtesy Discount*****	(\$40,000)
Total Estimated Cost, With Discount	\$145,199

See Additional Services below



Rodan + Fields Wage & Hour Settlement

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May 5, 2025

Notice Procedures	Response Rate	Quantity	Unit	Rate Per Unit	Estimated Cost	Total
Data and Forms Set-up						
Intake and Process Data, Set up Case Management System						
Format Documents						
NCOA Updates						
Sub-total of Data and Forms Set-up						
Email Campaign						
Spam Cleansing						
Email Service						
Email Campaign Management						
Estimated # of Bouncebacks						
Track/Manage Bouncebacks						
Sub-total of Email Campaign						
Print/Mail Notice Packet						
14-Page Notice, Outgoing Envelope						
Print Production Management						
Forwarding of Returned Mail with USPS Forwarding Addresses						
Data Entry for Re-mails to New Addresses						
Returned Undeliverable Mail						
Handling of Returned Undeliverable Mail						
Sub-total of Print/Mail Notice Packet						
Address Searches/Re-mails						
Number of Address Searches Performed						
Number of New Addresses Found						
Re-mails to Found Addresses						
Staff Time for Address Searches/Re-mails						
Sub-total of Address Searches/Re-mails						
Website Set-up & Maintenance						
Design & Set up Dynamic Website						
Website Domain Registration (for duration of website)						
Maintenance						
Server Space rental						
Sub-total of Website Set-up & Maintenance						
Case Management, Opt Out Processing, and Declarations						
Case Management						
Principal Project Management						
Opt-Out/Objection Processing (per hr)						
Correspondence Processing						
Declaration of Notice Procedures						
Declaration in Support of Preliminary Approval						
Sub-total of Case Management, Opt Out Processing, and Declarations						
Sub-total of Notice Procedures						\$57,512
<hr/>						
Class Member Support	Response Rate	Quantity	units	Rate Per Unit	Estimated Cost	Total
Automated Call Support						
Toll Free Phone Line & System Set-up Cost						
Script Drafting and Management						
Monthly Maintenance Fees						
Projected # of Calls (% of Class)						
- Average Call Duration (minutes)						
- IVR Line Charges						
Long-Form Notice Packet Requests						
- Fulfill Notice Packet Requests						
- Print Production Management						
Transcriptions						
Staff Time Downloading Transcribed Data (30 min/month x 12 months)						
Sub-total of Automated Call Support						
Email Handling						
Establish Email Inbox for Correspondence						
Estimated # of Emails						
- Average Email Duration (minutes)						
Staff Time Responding to Emails						
Sub-total of Email Handling						
Sub-total of Class Member Support						\$8,129



Rodan + Fields Wage & Hour Settlement

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May 5, 2025

Claims Administration	10% Filing Rate				25% Filing Rate				50% Filing Rate			
	%	Quantity	Rate	Total	%	Quantity	Rate	Total	%	Quantity	Rate	Total
Estimated # of Claims												
Process Claims Filed Online												
Process Claims Filed by Postal Mail												
- Staff Hours Processing Claims												
- Data Entry & Claims Scoring Set-up												
- Open/Image/Data Enter Forms												
Challenges filed by Postal Mail												
- Process Deficiency Responses												
- Staff Hours Processing Disputes												
Deficient Claims filed by Postal Mail												
- Print/Mail Deficiency Letters												
- Process Deficiency Responses												
- Staff Hours Reviewing Responses												
- Open/Image Forms												
Status Reports												
Sub-total of Claims Administration				\$9,251				\$15,327				\$34,578

Disbursements & Tax Reporting	10% Filing Rate				25% Filing Rate				50% Filing Rate			
	%	Quantity	Rate	Total	%	Quantity	Rate	Total	%	Quantity	Rate	Total
Payments to All												
- % PayPal / Venmo												
- % Electing Check Payment												
Funds Management, Obtain Tax ID												
Distribution Calculations & Prep												
Payroll Set-up & Reporting												
Tax Compliance												
Issue Payment via PayPal / Venmo												
- PayPal / Venmo Failures												
Print/Mail Checks												
Distribution Management												
Issue Forms 1099 MISC/INT												
Forms 1099 Reporting (annual)												
Returned Undeliverable Checks												
- Handling of Returned Undeliverable Mail												
Reissue Checks												
Post-Distribution Follow-up & Reports												
Settlement Fund Tax Returns (annual)				-								
Sub-total of Disbursements & Tax Reporting				\$50,491				\$50,491				\$51,691
SUB-TOTAL ADMINISTRATION COSTS				\$125,382				\$131,458				\$151,910
¹ Plus Estimated Postage*				\$33,228				\$33,243				\$33,290
Total Estimated Cost**				\$158,610				\$164,701				\$185,199
LESS CLIENT COURTESY DISCOUNT*****				(\$40,000)				(\$40,000)				(\$40,000)
TOTAL ESTIMATED COST, WITH DISCOUNT				\$118,610				\$124,701				\$145,199
NOT-TO-EXCEED AMOUNT****				\$150,000				\$150,000				\$160,000

¹ The USPS reserves the right to propose an increase in postage every 60 days.



Rodan + Fields Wage & Hour Settlement

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May 5, 2025

Additional Services

Checks to Failed Digital Payments	%	Quantity	5%	Rate	Total	%	Quantity	5%	Rate	Total	%	Quantity	5%	Rate	Total
Print/Mail Checks to PayPal/Venmo Failures Distribution Calculations & Prep Distribution Management															

Sub-total of Checks to Failed Digital Payments

\$3,000

\$3,000

\$3,000

Residual Disbursement	%	Quantity	Rate	Total	%	Quantity	Rate	Total	%	Quantity	Rate	Total
Total # of Payments Funds Management, Obtain Tax ID Distribution Calculations & Prep Payroll Set-up & Reporting Tax Compliance Issue Payment via PayPal / Venmo - PayPal / Venmo Failures Print/Mail Checks to PayPal Failures Distribution Management Issue Forms W2 & 1099 MISC/INT Forms 1099 Reporting (annual) Returned Undeliverable Checks - Handling of Returned Undeliverable Mail Reissue Checks Post-Distribution Follow-up & Reports Settlement Fund Tax Returns (annual)												

Sub-total of Residual Disbursement

\$48,827

\$48,827

\$48,827

STANDARD HOURLY RATES

Verita Standard Hourly Rates

- Principal
- Director
- Sr. Manager
- Manager
- Supervisor
- Staff

RATE PER UNIT

\$290.00 /hour
\$235.00 /hour
\$185.00 /hour
\$160.00 /hour
\$120.00 /hour
\$60.00 - \$85.00 /hour

Other Services and Out-of-Pocket Expenses

Estimated Cost

Other Services and Ad Hoc Reporting, as needed or requested
Other Charges and Out-of-Pocket Costs***

(standard hourly rates)
(actual)

- * Estimated Postage and Handling.
** Does not include applicable taxes or escheatment services.
*** Includes, but is not limited to long distance calls, overnight shipping, photocopies, storage, PO Box rentals, broker fees, etc.
**** Discount is contingent upon no significant change in the scope of work.
***** Not-to-Exceed Amount is contingent upon no change in the scope of work, a class size and claims filing rate of no more than 110% the rates used in the estimate above, and does not include additional services or contain taxes.

This Class Action Administration Services Estimate and the attached Cost Summary & Scope of Services (together, the "Proposal") are valid for ninety days from May 05, 2025. After such period, Verita reserves the right to amend the Proposal (including, without limitation, by increasing fees and costs) or to withdraw the Proposal in its sole discretion.

All services to be provided to the undersigned (the "Client") and all fees and costs set forth in the Proposal are subject to the terms, specifications, assumptions and conditions set forth in the Proposal and the attached Terms and Conditions (the "Terms of Service"). The estimated fees and charges in the Proposal are based on certain information provided to Verita as well as significant assumptions. Accordingly, this estimate is not intended to limit Verita's actual fees and charges, which may be less or more than estimated due to the scope of actual services or changes to the underlying facts or assumptions.

Verita

BY: _____ DATE: _____

TITLE: _____

Financially Responsible Party

BY: _____ DATE: _____

TITLE: _____

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles. I am over the age of eighteen years and not a party to
3 the within entitled action. My business address is 22525 Pacific Coast Highway, Malibu, CA 90265.

4 On **May 7, 2025**, I served a copy of the following document(s) on the interested party(ies) and/or
5 person(s) identified on the Service List in the manner set forth below.

6 **Documents Served**

7 **DECLARATION OF ANNETTE KASHKARIAN**

8 **Service List**

9 10 11 12 13 14 15 16	ELLIS GEORGE LLP Eric M. George egeorge@ellisgeorge.com Christopher T. Berg cberg@ellisgeorge.com 2121 Avenue of the Stars, Suite 3000 Los Angeles, CA 90067 <i>Attorneys for Defendants</i>	TYCKO & ZAVAREEI LLP Shana H. Khader skhader@tzlegal.com 2000 Pennsylvania Avenue, Northwest, Suite 1010 Washington, District of Columbia 20006 TYCKO & ZAVAREEI LLP Emily Feder Cooper ecooper@tzlegal.com 1970 Broadway, Suite 1070 Oakland, California 94612 <i>Attorneys for Plaintiff, the Putative Class, and all other Aggrieved Employees</i>
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17 **Method of Service**

18 **[X] BY ELECTRONIC MEANS:** I caused to be transmitted a true and correct copy of the foregoing
19 document(s) via File & Serve XPress to the interested party(ies)/person(s) as set forth on the above
20 service list pursuant to court order.

21 I declare under penalty of perjury under the laws of the State of California that the above is true and
22 correct.

23 Executed on **May 7, 2025**

24 /s/ Antonia Smith
25 Antonia Smith
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