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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF KING

NO. 20-2-09220-7 SEA

DOUGLAS PROUDLOVE, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SEED CONSULTING, LLC, doing business
as, SEED CAPITAL, CORP., ERIK GANTZ,
KEVIN TUSSY, and DOES 1-10,

Defendants.

**DECLARATION OF JEREMY
TALAVERA ON BEHALF OF CPT
GROUP, INC.**

1 **DECLARATION OF JEREMY TALAVERA**

2 I, Jeremy Talavera, declare as follows:

3 1. I am a Case Manager for CPT Group, Inc. (“CPT”). I have personal knowledge of
4 the facts stated herein, and, if called upon to testify, I could and would testify competently to
5 such facts.

6 2. CPT has extensive experience in providing notice of class actions and
7 administering class action settlements. In the past 30 years, we have provided notification and/or
8 claims administration services in hundreds of class action cases. Pursuant to the Stipulation of
9 Class Action Settlement for this matter, CPT is responsible for printing and mailing the Postcard
10 Notice, using the National Change of Address (NCOA) search and Skip Trace to obtain updated
11 and forwarding addresses, resolving any disputes received from Class Members, drafting and
12 mailing the settlement payments to participating Class Members, and performing such other
13 tasks as set forth in the Settlement Agreement and Release or as the Parties mutually agree or
14 that the Court orders.

15 3. CPT received the Court-approved text for the Notice Packet from Counsel on
16 October 17, 2022.

17 4. CPT finalized a Postcard Notice. CPT received written approval from all parties
18 and a sufficient number were printed to mail to all Class Members. A true and correct copy of
19 the Postcard Notice is attached hereto as Exhibit A.

20 5. On October 28, 2022, CPT received a class data file from Defense Counsel that
21 contained names, last known mailing addresses, and email addresses. The finalized class list
22 contained 505 Class Members.

23 6. On November 9, 2022, CPT conducted a National Change of Address (NCOA)
24 search in an attempt to update the class list of addresses as accurately as possible, for all
25 Settlement Class Members. A search of this database provides updated addresses for any
26 individual who moved in the previous four years and notified the U.S. Postal Service of a change
27 of address. As a result of the NCOA, CPT was able to locate 60 updated addresses.

1 7. On November 16, 2022, the Postcard Notices were mailed via U.S. first class mail
2 to all Class Members. Additionally, Notices were emailed to 432 Class Members with a valid
3 email address.

4 8. As of the date of this declaration, 37 Postcard Notices have been returned to our
5 office by the Post Office, of which 11 included a forwarding address. For those Notice Packets
6 with a forwarding address, CPT immediately re-mailed those Notice Packets to the forwarding
7 address upon receipt. CPT performed a Skip Trace on all returned mail with no forwarding
8 addresses in an effort to locate a better address using Accurint, one of the most comprehensive
9 address databases available. It utilizes hundreds of different databases supplied by credit
10 reporting agencies, public records and a variety of other national databases.

11 9. As a result of either skip trace, forwarding address provided from the Post Office,
12 or request from counsel or the Class Member themselves, a total of 21 Notice Packets have been
13 re-mailed to date. As of this date, there are ultimately 16 Notice Packets undeliverable with no
14 forwarding address, where no new address could be found through skip trace.

15 10. Class Members have until January 3, 2023, to submit objections, disputes and/or
16 requests for exclusion.

17 11. As of the date of this declaration, CPT has not received any written objections to
18 the settlement from Class Members.

19 12. As of the date of this declaration, CPT has not received any disputes from Class
20 Members.

21 13. As of the date of this declaration, CPT has not received any written requests for
22 exclusions.

23 14. As of the date of this declaration, CPT will report that a total of 505 participating
24 Class Members are part of this class action settlement, representing a 100% participation rate. As
25 of the date of this declaration, the total amount to be distributed to participating Class Members
26 is calculated to be \$989,823.00. The lowest payment to a participating Class Member is \$176.04.
27 The average payment to each participating Class Member is estimated at \$1,960.05. The highest
28 payment to a participating Class Member is estimated at \$2,960.75.

