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Attorneys for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA**

13 CRYSTAL HILLSLEY and WILLIAM
 14 RILEY, on behalf of themselves and all
 15 others similarly situated,

Plaintiff,

v.

18 OCEAN SPRAY CRANBERRIES,
 19 INC.,

Defendants.

CASE NO. 3:17-CV-02335-GPC-MDD

**SUPPLEMENTAL DECLARATION
 OF CLASS ADMINISTRATOR
 GAJAN RETNASABA REGARDING
 PLAINTIFFS' MOTION FOR FINAL
 APPROVAL OF CLASS ACTION
 SETTLEMENT**

Date: July 31, 2020
 Time: 1:30 PM
 Ctrm: 2D
 Judge: Hon. Gonzalo P. Curiel

1 I, Gajan Retnasaba, declare:

2 1. I am a Partner at Classaura LLC (“Classaura”), a class action
3 administration firm, located at 1718 Peachtree St #1080, Atlanta, Georgia. I am over
4 21 years of age and am not a party to this action. I have personal knowledge of the
5 facts set forth herein and, if called as a witness, could and would testify competently
6 thereto.

7 2. I have been asked by counsel to prepare a supplemental declaration to
8 provide an update on implementation of the notice plan.

9 **CLAIMS**

10 3. The claims period in this matter ended on July 1, 2020.

11 4. Since my prior declaration dated June 16, 2020 (Dkt. No. 248-2),
12 Classaura has received an additional 51,503 claim forms. Of these additional 51,503
13 claims, we found 22,554 claim form to be invalid due to be duplicative or not meeting
14 the settlement criteria. Accordingly, we found 28,949 additional claim forms to be
15 valid. Therefore, Classaura has now received a total of 224,103 valid claim forms.
16 The average valid claim form reported 16.3 purchases. Thus, the total number of
17 valid claims that will be paid, should the settlement be approved, is 3,661,994.

18 **REQUESTS FOR EXCLUSION**

19 5. In my previous declaration dated June 16, 2020, I noted that Classaura
20 had received 12 requests to opt-out of the settlement. (Dkt. No. 248-2 at ¶ 20). Since
21 the date of my prior declaration, Classaura has received one late request to opt-out of
22 the settlement from a class member named Dereck Jackson of Richmond, Virginia.
23 The deadline for Class members to request to be excluded from the class was a
24 postmarked deadline of July 1, 2020. Mr. Jackson’s request for exclusion was sent
25 electronically on July 2, 2020.

26 6. A list of the 13 requests to opt-out, including the late request from Mr.
27 Jackson, are attached to this supplemental declaration as Exhibit A.

28

1 **FINAL COSTS**

2 7. The costs incurred to provide notice of the settlement via publication,
3 Settlement Website, Press Release, Online Notice, and CAFA is \$213,000. The cost
4 to administer the settlement, and process claims is \$31,138 (based on 311,385
5 claims). The cost to distribute payment to class members is \$168,077 (based on
6 224,103 approved claims). This brings the total cost to \$412,215.

7
8 I declare under penalty of perjury of the laws of the United States that the
9 foregoing is true and correct. Executed on July 23, 2020 in Atlanta, Georgia.


10
11
12 
13 _____
14 Gajan Retnasaba

Exhibit A

1. Gloria Corradino
Williams, CA

2. Allison Bolds
Statesboro, GA

3. Angelia Jones
Akron, OH

4. Sharon Graham
Philadelphia, PA

5. Kathleen Layton
Bakersfield, CA

6. Carolyn Wozniak
Buffalo, NY

7. Mayra Najera
Los Angeles, CA

8. Lana Terrell
Perkasie, PA

9. Barbara Mulligan
Allentown, PA

10. Lexie Burgess
Spring, TX

11. Denise Trimble
Willits, CA

12. Mandy Bickel
Tucson, AZ 85745

13. Derek Jackson
Richmond, VA
(*received after filing deadline)