

Bruce D. Greenberg, Esq.
(NJ ID#: 014951982)
LITE DEPALMA GREENBERG &
AFANADOR, LLC
570 Broad Street, Suite 1201
Newark, New Jersey 07102
Telephone: (973) 623-3000
Facsimile: (973) 623-0858
bgreenberg@litedepalma.com

Chant Yedalian (*pro hac vice*)
CHANT & COMPANY
A Professional Law Corporation
709 Alexander Lane
Rockwall, Texas 75087
Telephone: (877) 574-7100
Facsimile: (877) 574-9411
chant@chant.mobi

*Attorneys for Plaintiff Ellen Baskin
and the Class*

ELLEN BASKIN, KATHLEEN O'SHEA and
SANDEEP TRISAL, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

P.C. RICHARD & SON, LLC (d/b/a P.C. Richard &
Son) and P.C. RICHARD & SON, INC. (d/b/a P.C.
Richard & Son),

Defendants.

SUPERIOR COURT OF NEW JERSEY
OCEAN COUNTY – LAW DIVISION

DOCKET NO. OCN-L-000911-18

Civil Action

**SUPPLEMENTAL CERTIFICATION OF
CHRISTOPHER LONGLEY OF ATTICUS
ADMINISTRATION CONCERNING STATUS
OF NOTICE AND ADMINISTRATION**

CHRISTOPER Q. LONGLEY, ESQ., of full legal age, hereby certifies as follows:

1. I have personal knowledge of the matters stated herein. If called to testify, I could and would competently testify to the matters stated in this Certification.

2. I am the Chief Executive Officer at the class action notice and settlement administration firm, Atticus Administration LLC (“Atticus”).

3. In my previous Certification, I had informed the Court that Atticus would provide a further update as follows: “After the opt-out period and objection periods have expired, but before the final approval hearing, Atticus will provide a further update through a supplemental certification that will be filed with the Court.” Longley Certification, filed June 20, 2024, ¶ 23.

4. This Supplemental Certification serves that purpose and provides updates concerning: (1) the notice program implemented by Atticus as approved by the Court’s May 10, 2024 Order granting preliminary approval of the settlement; (2) the status of any opt-outs; and (3) the status of any objections.

NOTICE TO THE SETTLEMENT CLASS

5. Atticus has implemented all of the notice approved by the Court’s May 10, 2024 Order granting preliminary approval of the settlement.

Mailed Notice

6. On May 30, 2024, Atticus mailed the Mailed Notice to 52,998 Settlement Class members for whom a last known mailing address is available. This represents more than 87% of the approximately 60,892 customers who are members of the Settlement Class. The Mailed Notice was sent via pre-paid postage first class mail through the United States Postal Service. Prior to sending the Mailed Notice, Atticus verified the last known address using the National Change of Address (“NCOA”) database maintained by the United States Postal Office, and, if an

updated address was found, that updated address was used in lieu of the last known address for purposes of this mailing.

7. Atticus uses a variety of tools for skip-tracing purposes in order to find addresses that have no forwarding location. These tools include Experian or IDI, and other professional resources to locate class members. Any mailed notices that are returned were processed, skip-traced and re-mailed. As of August 5, 2024, 549 Mailed Notices had been returned to Atticus as undeliverable and without forwarding address information from the United States Postal Service. The undeliverable records were sent to a professional service for address tracing where addresses were obtained for 257 undeliverable records and were not obtained for 292 undeliverable records. Notice was promptly mailed to the 257 addresses obtained through trace.

8. Settlement Class members with undeliverable Mailed Notices but for whom an email address is available were sent emails requesting that they provide their current mailing address if they would like to receive payment. 245 of the 292 Settlement Class members with undeliverable Mailed Notices that could not be successfully traced were sent an email asking them to provide Atticus with their current mailing address if they would like to receive payment.

Email Notice

9. In addition to recovering mailing addresses, our work with Plaintiff's counsel has also resulted in us recovering an email address for 47,902 out of the approximately 60,892 Settlement Class members.

10. On May 30, 2024, Atticus sent Email Notice to 47,902 Settlement Class members for whom an email address is available. In total, the Email Notice was successfully sent to 44,550 Settlement Class members of which 26,350 were opened resulting in 338 click throughs or visits to the Settlement Website. Three thousand three hundred fifty-two (3,352) of the

attempted emails bounced and could not be delivered for reasons including suspended accounts, full mailboxes, and non-existent addresses.

Targeted Internet Notice

11. Of the approximately 60,892 Settlement Class members, there are approximately 7,767 for whom neither a mailing address or email address is known. Targeted Internet Notice consisting of targeted internet ads were provided. Agreement ¶ 4(c). Using hyperlinks, these ads allow viewers to click through to the Settlement Website and review it and documents posted on the Settlement Website, including the long-form Full Notice. The Targeted Internet Notice campaign commenced on May 30, 2024 and has thus far resulted in a total of 33,330,837 impressions, which generated 19,031 click throughs or visits to the Settlement Website.

Settlement Website

12. The Settlement Website was established and went live on the internet on May 30, 2024. It allows Settlement Class members to view general information about the Settlement, relevant Court documents (such as the settlement agreement, preliminary approval Order, Full Notice, etc.) and important dates and deadlines pertinent to the Settlement. As of August 5, 2024, the Settlement Website has received 20,238 views (this number includes the 19,031 click throughs described in paragraph 11, above).

13. On June 20, 2024, Atticus posted to the Settlement Website Plaintiff's Unopposed Motion For Final Approval Of Class Action Settlement and related documents. Since June 20, 2024, those documents remain continuously posted on the Settlement Website.

14. On June 20, 2024, Atticus posted to the Settlement Website Plaintiff's Unopposed Motion For Award Of Attorneys' Fees And Costs To Class Counsel And Incentive Award To

The Class Representative and related documents. Since June 20, 2024, those documents remain continuously posted on the Settlement Website.

Toll-Free Telephone Number

15. A dedicated toll-free telephone number was implemented on May 30, 2024, which Settlement Class members may call with any questions or comments. To date, 63 calls have been received.

Opt-Outs

16. Settlement Class members were provided a sixty (60) day opt-out period after the date the Full Notice was first posted to exclude themselves from the settlement (the “Opt-Out Deadline”). May 10, 2024 Order ¶ 10; Agreement ¶ 5(a).

17. This opt-out period expired on July 29, 2024.

18. As of the date of this Supplemental Certification, Atticus has received only three opt outs. Atticus has determined that all three opt outs are timely and valid.

Objections

19. Settlement Class members were provided until thirty (30) days before the fairness hearing to object to the Settlement and/or to the attorneys’ fees, costs or incentive award. May 10, 2024 Order ¶¶ 11-13; Agreement ¶ 6.

20. The objection period expired on July 22, 2024.

//

//

//

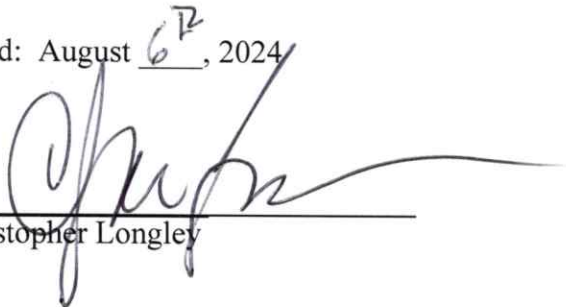
//

//

21. As of the date of this Supplemental Certification, Atticus has not received any objections.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 6th, 2024



Christopher Longley