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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

GORDON NOBORU YAMAGATA and
STAMATIS F. PELARDIS, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

RECKITT BENCKISER LLC,

Defendant.

Case No. 3:17-cv-03529-VC

**DECLARATION OF EAMON MASON
REGARDING DISTRIBUTION OF
SETTLEMENT FUNDS**

CLASS ACTION

District Judge Vince Chhabria
Courtroom 4, 17th Floor

Complaint Filed: June 19, 2017

I, Eamon Mason, declare as follows:

1. I am a Senior Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”), the Court-appointed Settlement Administrator for the above-captioned case. The statements of fact in this declaration are based on my personal knowledge and information provided to me by my colleagues in the ordinary course of business, and if called on to do so, I could and would testify competently thereto.

2. Epiq previously submitted three declarations in connection with this case, which were executed on March 2, 2021, September 23, 2021, and October 21, 2021, and detailed the successful implementation of the Court-approved Class Notice Program and completion of all notice activities.¹ I submit this declaration in order to advise the Court and the Parties regarding distribution of Settlement funds in accordance with the Settlement Agreement, the Preliminary Approval Order and the Final Approval Order.

3. Pursuant to Section V of the Settlement Agreement, Epiq determined Class Members’ eligibility for payment based on the information contained in each Claim Form and calculated Class Member payments on a pro rata basis in accordance with Section IV of the Settlement Agreement. Epiq made the payment calculations with regard to the Net Fund

¹ All capitalized terms have the same meaning ascribed to them in the Settlement Agreement.

1 established in accordance with Section IV.5.d of the Settlement Agreement.

2 4. A total of 335,722 Class Members submitted valid claims for a total of 1,417,418
3 bottles of Move Free Advanced purchased. Pursuant to Section V.6 of the Settlement Agreement,
4 beginning on April 7, 2022, Epiq issued checks to the 207,007 Class Members who elected to
5 receive their payments via check. 196,177 of these Class Members cashed their checks totaling
6 \$20,389,587.36 before the end of the 90-day negotiation period ended on July 6, 2022. On April 4,
7 2022, Epiq sent a “warm-up” email advising the 128,715 Class Members who elected to receive
8 digital payments that they would be receiving a digital payment in the coming days. On April 7,
9 2022, the digital payments were emailed to all of those Class Members. In the aggregate, a total of
10 \$34,871,155.74, was sent to the 335,722 Class Members who submitted valid claims.

11 5. On May 2, 2022, Epiq sent a reminder email to the digital Claimants to claim their
12 digital payments by May 7, 2022. On June 7, 2022, following the stale date for claiming the digital
13 payments, Epiq mailed checks to 32,705 digital Claimants who had not claimed the digital payment
14 in the aggregate amount of \$3,325,822.09. These checks became stale on August 6, 2022.

15 6. Prior to mailing checks, Epiq ran all mailing addresses against the National Change
16 of Address (“NCOA”) database maintained by the United States Postal Service (“USPS”). In
17 addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to ensure
18 the quality of the zip code, and verified through Delivery Point Validation (“DPV”) to verify the
19 accuracy of the addresses. To the extent that any Class Member had filed a USPS change of address
20 request, and the address was certified and verified, the current address listed in the NCOA database
21 was used. This address updating process is standard for the industry and for the majority of
22 mailings that occur today.

23 7. After the distribution, Epiq has promptly re-mailed checks to 5,493 Class Members
24 for whom either the Class Member provided an updated address or the USPS returned mail to Epiq
25 with forwarding information.

26 8. Pursuant to Section IV.4.f of the Settlement Agreement, Settlement Class Members
27 were required to cash their settlement checks within 90 days of their mailing date. As of October
28

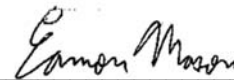
1 4, 2022, a total of 95,916 digital payments in the aggregate amount of \$10,063,507.68 were claimed
2 and 219,702 checks in the aggregate amount of \$22,826,702.26 were cashed. A total of 20,097
3 checks in the aggregate amount of \$1,979,593.35 remain uncashed. The uncashed population
4 includes a total of 32 re-mailed checks in the aggregate amount of \$5,483.57 which will reach their
5 stale date on October 21, 2022.

6 9. As of October 4, 2022, the amount remaining in the Net Fund, after payment of
7 Class Counsel's fees and expenses, Service Award payments to the Class Representatives,
8 payments provided to Class Members, and the costs and expenses of notice and Settlement
9 administration, including estimated administration costs through project closure, is \$1,922,516.08.

10 10. Each Claimant received \$24.59 per bottle, the average recovery per Claimant was
11 \$103.82, the median recovery per Claimant was \$73.77, and the smallest and largest recoveries for
12 Claimants were \$24.59 and \$6,147.50, respectively.

13 11. Pursuant to Section IV.4.f of the Settlement Agreement, Epiq will distribute the
14 remaining funds to the Court-approved Cy Pres Recipient.

15 I declare under penalty of perjury of the laws of the United States and the State of California
16 that the foregoing is true and correct. Executed on October 7, 2022, in Seattle, Washington.

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CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Electronic Mail Notice List.

Executed on October 7, 2022.

s/ Timothy G. Blood

TIMOTHY G. BLOOD

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