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SUPERIOR COURT OF THE STATE OF CALIFORNIA

CASE NO. BC550394

(Case assigned to Hon. Elihu M. Berle)

DECLARATION OF APRIL VAUGHT IN SUPPORT OF FINAL APPROVAL OF **CLASS ACTION SETTLEMENT**

July 21, 2014

October 11, 2018

11:00 a.m.

DECLARATION OF APRIL VAUGHT

I, APRIL VAUGHT, declare as follows:

- 1. I am a Project Manager at Kurtzman Carson Consultants LLC ("KCC"). I make this declaration in support of the Motion for Final Approval of Class Action Settlement in *Howard Jarvis Taxpayers Assn.*, et al. v. City of Pasadena, Case No. BC550394. Unless otherwise indicated, I have personal knowledge of the facts set forth herein and, if called as a witness, I could testify competently thereto.
- 2. I have been employed with KCC for approximately 1 year. In the regular course of my duties, I have become familiar with KCC's general practices in the administration of class action settlements, and I am specifically familiar with its administration of the settlement in this case.
- 3. The City of Pasadena provided KCC with a list of names and addresses for current and former water customers who fall into the settlement class for this case. On July 11, 2018, KCC mailed 8,139 notices of the proposed settlement to the members of the settlement class. 194 of these notices were returned as undeliverable as of August 7, 2018. KCC performed skip trace searches to find updated addresses for these undeliverable notices, were able obtain updated addresses for 39 notices, and have re-mailed those notices accordingly. The skip trace search of the remaining 155 notices did not provide an updated address.
- 4. On July 11, 2018, KCC caused a website regarding this settlement (http://howardjarvisvcityofpasadena.com) to go "live." This website provides information on the case, the proposed settlement, and how to object to or opt out of that settlement.
- 5. At KCC's request, the *Pasadena Star-News* published a one-half page advertisement providing notice of the proposed settlement on July 12, July 18, and July 25, 2018.
- 6. Both the website and the notice published in the *Pasadena Star-News* list a toll-free phone number class members may call with questions about the case and the proposed settlement: 866-637-9469. As of the date of this declaration, KCC has received 2 phone inquiries.
- 7. As of August 7, 2018, KCC has received a total of six opt-outs and zero objections regarding the proposed settlement.

	8.	As the deadline to opt-out of or object to the proposed settlement is September 11,
2018,	KCC	plans to provide an updated declaration on the administration of this settlement after that
date, l	but not	later than September 27, 2018.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 13, 2018, at Louisville, Kentucky.

APRIL VALIGHT