

**IN THE CIRCUIT COURT OF DUPAGE COUNTY  
EIGHTEENTH JUDICIAL CIRCUIT**

Candice Adams  
e-filed in the 18th Judicial Circuit Court  
DuPage County  
ENVELOPE: 23026762  
2023LA000015  
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DAVID BAMBERG, Individually and on )  
behalf of all others similarly situated, )  
)  
Plaintiff, )  
v. )  
)  
DYNAMIC MANUFACTURING, INC., )  
)  
Defendant. )  
)

Case No. 2023LA000051MB  
Judge: Hon. Timothy McJoynt

**DECLARATION OF CAROLINE P. BARAZESH REGARDING SETTLEMENT  
ADMINISTRATION**

I, Caroline P. Barazesh, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am over the age of twenty-one. I am competent to give this declaration. This declaration is true and correct to the best of my knowledge, information and belief.
2. I am currently a Director for Analytics Consulting LLC (hereinafter “Analytics”), located at 18675 Lake Drive East, Chanhassen, Minnesota, 55317. In my capacity as Director, I am responsible for settlement administration in the above-captioned litigation.
3. Analytics was engaged to provide settlement administration services in the *Bamberg v. Dynamic Manufacturing, Inc.* case. In this capacity, Analytics was charged with (a) establishing and maintaining a related settlement fund account; (b) establishing and maintaining a calendar of administrative deadlines and responsibilities; (c) printing and mailing the Notices of Class Action Settlement; (d) receiving and validating Requests for Exclusion, Objections and Claims submitted by Settlement Class Members; (e) processing and mailing payments to Settlement Class Members and Class Counsel; and (f) other tasks as the Parties mutually agree or the Court orders Analytics to perform.

4. On March 30, 2023, Counsel for Defendant provided Analytics with a mailing list (“Class List”) containing Settlement Class Members’ names, last known mailing address, phone numbers and Social Security Numbers where available, for 2,283 Settlement Class Members.

5. On March 31, 2023, Analytics received the Court-approved Notice of Class Action Settlement (“Class Notice”) and Claim Form. The Class Notice advised Settlement Class Members of their right to request exclusion from the Settlement, object to the Settlement or file a Claim Form and the implications of each such action. The Class Notice advised Settlement Class Members of applicable deadlines and other events, including the Final Approval Hearing, and how they could obtain additional information.

6. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service. The NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA would be utilized in connection with the mailing of the Notice Packets.

7. Analytics established a toll-free phone number (833) 821-6836 and a case website at [www.DynamicBIPASettlement.com](http://www.DynamicBIPASettlement.com) to provide assistance and information to Settlement Class Members. The website provided the opportunity for Settlement Class Members to file a claim form electronically. The toll-free phone number and website address were included in the Class Notice and Claim Form.

8. On April 10, 2023, Analytics mailed the approved Class Notice in postcard format to the most current mailing address of 2,283 Settlement Class Members via USPS First Class Mail. A copy of the Class Notice is attached hereto as Exhibit 1.

9. If a Class Notice was returned by the USPS as undeliverable and without a forwarding address, Analytics performed an advanced address search on the addresses of undeliverable records by using Experian, a reputable research tool. Analytics used the name and previous address and phone number to locate a current address. 358 Class Notices were returned as undeliverable by the Post Office. Analytics located 128 updated addresses and Notice Packets were mailed to the updated addresses.

10. 2,008 Settlement Class Members were mailed a Class Notice that was not returned as undeliverable, representing 89.7% of total Settlement Class Members.

11. Class Members could exclude themselves from the proposed settlement by mailing a written statement requesting exclusion from the Class to Analytics by May 22, 2023. Zero exclusion requests were received by Analytics.

12. Class Members could object to the proposed settlement by mailing a written statement objecting to the settlement to the Clerk of the Circuit Court, with copies to Class Counsel and Defendant's Counsel by May 22, 2023. Zero objections were received by Analytics.

13. Settlement Class Members had to return a valid Claim Form postmarked by May 22, 2023, in order to receive a settlement payment from the proposed settlement. A total of 415 Claim Forms were received, of which 56 Claim Forms are deficient because they were not fully completed. Deficiency letters were mailed to Class Members with deficient claim forms with a response deadline of June 23, 2023. This is an 18.54% claims rate.

14. Analytics' total costs for services in connection with the administration of this Settlement, including fees incurred and anticipated future costs for completion of the administration, are estimated to be \$18,705. This amount will be paid by Defendant from the Gross Fund. Analytics' work

in connection with this matter will continue with the completion of claims processing, issuance and mailing of the settlement checks and to do the necessary tax reporting for the settlement fund.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 25, 2023

  
Caroline P. Barazesh

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