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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KAREN SOLBERG, et al.,

Case No. 14-cv-05266-VC

Plaintiffs,

v.

**DECLARATION OF
JENNIFER M. KEOUGH REGARDING
NOTICE PLAN AND SETTLEMENT
ADMINISTRATION**

VICTIM SERVICES, INC., d/b/a
CORRECTIVESOLUTIONS, et al.,

Defendants.

Honorable Vince Chhabria

I, JENNIFER M. KEOUGH, declare as follows:

1. I am the Chief Executive Officer (“CEO”) of JND Legal Administration LLC (“JND”). This Declaration is based on my personal knowledge, as well as information provided to me by experienced JND employees and, if called upon to do so, I could and would testify competently thereto.

2. I previously filed a Declaration Regarding Administration Costs, dated January 29, 2021, ECF No. 393. This Declaration is being filed to update the Court on the implementation of the Notice Plan¹ and Settlement administration.

CLASS MEMBER DATA

3. On April 8, 2021, Class Counsel provided JND with an electronic list of unique IDs representing 48,067 Class Members along with data indicating whether they were included in the UCL Class or FDCPA Class, and the amount each Class Member previously paid the Defendants. This data

¹ Capitalized terms used and not otherwise defined in this Declaration shall have the meanings given such terms in the Settlement Agreement and Release, dated January 29, 2021, ECF No 391-1.

1 supplemented the names, last known mailing addresses, email addresses, and telephone numbers, to
2 the extent available, of these Class Members that JND previously received to issue notice of pendency.
3 Named Plaintiff Narisha Bonakdar was also added to the Class Member list resulting in 48,068 Class
4 Members to issue Settlement Notice on May 10, 2021 (“Initial Class Member Notice List”).

5 4. In addition, on June 10, 2021, JND received a second electronic list containing 2,405
6 additional Class Members for JND to issue Settlement Notice (“Supplemental Class Member Notice
7 List”). The Supplemental Class Member Notice List contained the same data fields provided to JND
8 in the Initial Class Member Notice List.
9

10 5. JND loaded both the Initial and Supplemental Class Member Notice Lists into a
11 dedicated Settlement database. A unique Claimant ID was assigned to each Class Member to identify
12 that Class Member throughout the Settlement administration process. In total, the Initial and
13 Supplemental Class Member Notice Lists contained 50,473 Class Members to issue Settlement Notice.
14

15 6. Prior to sending Mail Settlement Notices, JND updated Class Member mailing address
16 information using data from the National Change of Address (“NCOA”) database.²

17 **SETTLEMENT EMAIL NOTICE**

18 7. Per Paragraph 7 of the Order Approving Notice of a Proposed Class Action Settlement
19 as Modified, dated March 31, 2021, ECF No. 406 (“Preliminary Approval Order”) JND commenced
20 Settlement Email Notice on May 10, 2021 to 19,450 Class Members on the Initial Class Member
21 Notice List with 19,480 email addresses. A representative sample of the Settlement Email Notice is
22 attached as Exhibit A.
23
24

25 _____
26 ² The NCOA database is the official United States Postal Service (“USPS”) technology product which
27 makes changes of address information available to mailers to help reduce undeliverable mail pieces
28 before mail enters the mail stream. This product is an effective tool to update address changes when
a person has completed a change of address form with the USPS. The address information is
maintained in the database for 48 months.

1 8. Of the 19,450 Class Members sent Settlement Email Notice on the Initial Class
2 Member Notice List, 12,236 or 63% were deemed delivered and 7,214 or 37% were deemed
3 undeliverable.

4 9. In addition, at the direction of Class Counsel, JND commenced Settlement Email
5 Notice on June 14, 2021 to 1,383 Class Members on the Supplemental Class Member Notice List with
6 1,388 email addresses.

7
8 10. Of the 1,383 Class Members sent Settlement Email Notice on the Supplemental Class
9 Member Notice List, 1,191 or 86% were deemed delivered and 192 or 14% were undeliverable.

10 11. In total, of the 20,833 Class Members sent Initial and Supplemental Class Member
11 Settlement Email Notices, 13,427 or 64% have been deemed delivered and 7,406 or 36% have been
12 deemed undeliverable.

13
14 **SETTLEMENT MAIL NOTICE**

15 12. Per Paragraph 7 of the Preliminary Approval Order, JND sent a Settlement Mail Notice
16 on May 10, 2021 by USPS first class mail, postage pre-paid, to 28,615 Class Members on the Initial
17 Class Member Notice List, with 29,016 mailing addresses, without a valid email address. In addition,
18 JND sent a Settlement Mail Notice to the 7,214 Class Members on the Initial Class Member Notice
19 List whose Settlement Email Notice was returned undeliverable. A representative sample of the
20 Settlement Mail Notice is attached as Exhibit B.

21
22 13. As of August 3, 2021, 5,065 Initial Class Member Notice List Mail Notices have been
23 returned to JND as undeliverable. Of these 5,065 undeliverable Mail Notices, 208 were forwarded to
24 an updated address provided by the USPS. For the remaining 4,857, JND conducted an advanced
25 address search, received an updated address for 2,836 Class Member addresses, and remailed the
26 Settlement Mail Notice.

1 14. In addition, at the direction of Class Counsel, JND sent Settlement Mail Notice on June
2 14, 2021 by USPS first class mail, postage pre-paid, to the 1,022 Class Members on the Supplemental
3 Class Member Notice List, with 1,026 mailing addresses on file, without a valid email address.
4 Additionally, JND sent a Settlement Mail Notice to the 192 Class Members on the Supplemental Class
5 Member Notice List whose Email Notice was returned undeliverable.

6 15. As of August 3, 2021, 212 Supplemental Class Member Notice List Settlement Mail
7 Notices have been returned to JND as undeliverable. Of these 212, one was returned with an updated
8 address provided by the USPS. For the remaining 195 that were received on or before July 9, 2021
9 (the original claims deadline), JND conducted an advanced address search and received updated
10 address information for 115 Class Members.
11

12 16. Pursuant to the Court’s Stipulated Motion and Order to Approve Supplemental Notice
13 and Extend Claim Filing, dated July 14, 2021, ECF 415, JND revised the Mail Notice to reflect
14 extended claim, exclusion and objection filing deadlines of August 16, 2021 (“Supplemental Mail
15 Notice”). On July 16, 2021, JND mailed the Supplemental Mail Notice to the 116 Supplemental Class
16 Member Notice List Class Members with updated addresses. A representative sample of the
17 Supplemental Postcard Notice is attached as Exhibit C.
18

19 17. As of August 3, 2021, of the Class Members sent 37,043 Initial and Supplemental Class
20 Member Settlement Mail Notices, 33,786 or 91% have been deemed delivered and 3,257 or 9% have
21 been deemed undeliverable.
22

23 18. In total, of the 50,473 Class Members on the Initial and Supplemental Class Member
24 Notice Lists, 47,213 or 94% were issued a Settlement Mail or Email Notice that was deemed delivered
25 and 3,260³ or 6% were issued a Settlement Mail or Email Notice deemed undeliverable.
26

27 ³ There were Class Members who were not issued Settlement Mail or Email Notice because there was
28 insufficient email and mail contact information provided in the Initial Class Member Notice List.

SETTLEMENT WEBSITE

1
2 19. Pursuant to the Preliminary Approval Order, on May 10, 2021, JND updated the
3 dedicated, case-specific website for the above-captioned litigation,
4 www.CheckDiversionClassAction.com, to provide important information about the proposed
5 Settlement. The “Home” page provides a summary of the proposed Settlement, key dates, and an
6 overview of legal rights and options. The “FAQ” page provides answers to frequently asked questions,
7 information about filing a claim, how to request exclusion or objection, the dates and information for
8 relevant Court proceedings, including the Final Approval Hearing, and contact information for JND.
9 The “Important Documents” page provides downloadable PDF copies of important Court documents,
10 including, but not limited to, the Second Amended Complaint, the Settlement Agreement and Release,
11 Preliminary Approval Order, the Motion for Attorneys' Fees, Reimbursement of Litigation Costs, and
12 Service Awards, Mail Notice, and the Claim Form. The “Online Exclusion Form” and “File a Claim”
13 pages, respectively, allow Class Members to file an Exclusion Form or Claim Form through the August
14 16, 2021 filing deadline. Additionally, Class Members are able to look up the amount they previously
15 paid the Defendants on the “Fee Payment Lookup” page of the Settlement Website.

16
17
18 20. Between May 10, 2021, when Initial Class Member Email and Mail Settlement Notice
19 was issued, and August 3, 2021, there were a total of 28,072 views of the Settlement Website pages
20 and documents and 7,026 unique visitors to the Settlement Website. JND will continue to update and
21 maintain the Settlement Website throughout the Settlement administration process.
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EXCLUSIONS RECEIVED

1
2 21. Email and Mail Settlement Notices informed Class Members who wanted to exclude
3 themselves from the Settlement (“opt-out”) that they must do so by submitting an exclusion request
4 electronically on the Settlement website or by mailing an exclusion letter to JND, postmarked on or
5 before the August 16, 2021 Opt-Out Deadline. Per the Settlement Agreement and Settlement Website
6 Settlement Notice, the exclusion request must be signed and include the Class Member’s full name,
7 address, and a request to be removed as a Class Member.
8

9 22. As of the date of this Declaration, JND has received two timely and valid exclusion
10 requests submitted electronically through the Settlement Website. A list of the timely and valid
11 exclusions is attached as Exhibit D.
12

OBJECTIONS

13
14 23. Email and Mail Settlement Notices informed Class Members who wanted to object to
15 the Settlement that they must do so by filing a written objection with the Court by the August 16, 2021
16 Objection Deadline. Per the Preliminary Approval Order, the written objection should include the
17 case name and number, the objector’s name, address, and telephone number, and the reason(s) for the
18 objection.
19

20 24. As of August 3, 2021, no Settlement objections have been filed.
21

CLAIMS RECEIVED

22
23 25. Settlement Email and Mail Notices informed Class Members that they can submit a
24 claim online through the Settlement Website or by mail using the downloadable Claim Form available
25 on the Settlement Website by the August 16, 2021 Claim Deadline. A copy of the Settlement Website
26 Claim Form is attached as Exhibit E.
27
28

1 26. As of August 3, 2021, JND has received a total of 2,533 Claim Forms (2,038 received
2 online and 495 received by mail). Of the 2,533 claims, 1,965 were matched to Class Member records
3 and 568 are currently being processed.

4 27. JND continues to receive and review Claim Forms and solicit feedback from the
5 Parties. Accordingly, the number of claims received and validated will change prior to Settlement
6 benefit distribution.

7
8 **SETTLEMENT ADMINISTRATION AND NOTICE OF PENDENCY FEES AND**
9 **EXPENSES**

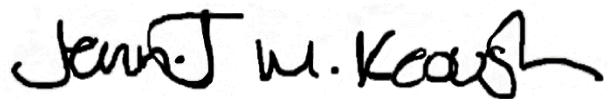
10 28. JND has performed its responsibilities as set forth in the Settlement Agreement and
11 Preliminary Approval Order. As of June 30, 2021, JND has billed \$62,639.13 in Settlement
12 administration fees and expenses. JND's costs have exceeded its original estimate due to the
13 supplemental data processing and noticing efforts described in this Declaration.

14 29. In addition to its Settlement administration fees and expenses, JND incurred
15 \$46,768.68 in notice administration fees and expenses in performing its responsibilities associated
16 with the notice of pendency of class certification.

17 30. JND will continue to administer the Settlement through all phases of Settlement
18 administration, as required by the Settlement Agreement, Preliminary Approval Order, and pursuant
19 to any future Orders of this Court.

20
21 I declare under the penalty of perjury pursuant to the laws of the United States of America that
22 the foregoing is true and correct.

23
24 Executed on August 5, 2021 in Seattle, Washington.

25
26 

27 JENNIFER M. KEOUGH

EXHIBIT A

From: info@CheckDiversionClassAction.com
To: [Email Address]
Re: Legal Notice of Check Diversion Class Action Settlement

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Solberg et al. v. Victim Services, Inc, et al., No. 3:14-cv-05266-VC
(U. S. District Court, Northern District of California)

This is not a collection notice or an attempt to collect a debt.

If you received one or more letters about a check diversion program printed on California district attorney letterhead, you may get a payment from a class action settlement.

The settlement resolves a lawsuit over whether Defendants National Corrective Group Inc., Victim Services, Inc., American Justice Solution, Inc., Birch Grove Holdings, Inc., Mats Jonsson, and Karl Thomas Jonsson violated the federal Fair Debt Collection Practices Act (“FDCPA”) and the California Unfair Competition Law (“UCL”). Specifically, Plaintiffs allege that Defendants violated federal and California law by collecting and attempting to collect fees that were not permitted by law. Defendants deny all allegations made by the Plaintiffs. The Court has not decided that Defendants did anything wrong.

Defendants have agreed to pay a total of \$1,100,000 to settle the lawsuit. You must file a claim by visiting www.CheckDiversionClassAction.com by July 9, 2021 in order to get a payment.

For ease of reference, we are issuing you the following Claimant ID number, should you wish to communicate with us. You will also need the below Claimant ID if you wish to submit a claim or exclusion online.

Claimant ID: [JND Claimant ID]

Am I a Class Member? You may be a member of the UCL Class if you were sent an initial collection demand on district attorney letterhead between September 1, 2011 and May 7, 2015, and later made a payment or payments to a “Bad Check Restitution Program.” You may be a member of the FDCPA Class if, between December 1, 2013 and May 7, 2015, you were sent a collection demand on district attorney letterhead in connection with a check written for personal, family, or household purposes.

What Does the Settlement Provide? The Settlement requires the Defendants to pay \$1,100,000 into a settlement fund that will be used to pay the Class Representatives, the lawyers representing the class, the costs of issuing this notice and checks, and settlement awards to class members who file claims. You must file a claim to get a payment. If you are a member of the UCL Class, the amount you get from the Settlement will be based on the amount you paid in fees and how many people make claims. If you are a member of the FDCPA Class, you can make a claim for a share of the \$20,000 allocated to statutory damages, even if you paid no money to Defendants. The

lawyers for the Class will request payments from the fund of \$275,000 in attorneys' fees, \$135,000 in litigation costs, and \$3,000 for each Class Representative (\$9,000 total).

YOUR RIGHTS AND OPTIONS

Submit a claim by July 9, 2021. This is the only way to get a payment. To submit a claim, visit www.CheckDiversionClassAction.com. Completing the form takes less than a minute. If you make a claim, you give up certain rights to sue the Defendants separately.

Do Nothing. Get no money from the settlement. Give up certain rights. If you do nothing, you will get no money from the settlement and you give up any rights to sue the Defendants for the same or similar legal claims based on the same set of facts as those alleged in this lawsuit. The Defendants are Victim Services, Inc., National Corrective Group, Inc., American Justice Solutions, Inc., Birch Grove Holdings, Inc., Mats Jonsson, and Karl Thomas Jonsson.

Ask to be Excluded by July 9, 2021. Opt out of this lawsuit. Get no benefits from it. Keep rights. This is the only option that allows you to sue the Defendants for the same or similar legal claims based on the same facts as those alleged in this lawsuit. You can either mail your exclusion request or submit it online. Your exclusion request must be postmarked or submitted online on or before July 9, 2021. If you mail your request, include your name, address, telephone number and the case name "*Solberg v. Victim Services, Inc.*" To submit an exclusion request online or for more information about this case and opting out, visit www.CheckDiversionClassAction.com or call 1-855-349-7023.

Object to the Settlement by July 9, 2021. Stay in this lawsuit. File a written objection to the settlement with the Court or appear at the hearing. If you think the settlement should be rejected, you can tell the Court why you don't like the Settlement Agreement. The Court cannot change the settlement. You can still submit a claim if you file an objection, but you cannot exclude yourself and object. If the settlement is approved, you will be bound by the Settlement Agreement and you give up rights to sue the Defendants in this lawsuit separately based on the same facts. For instructions on how to file an objection, visit www.CheckDiversionClassAction.com.

Attend the Final Approval Hearing. The hearing is scheduled for August 5, 2021 at 2 p.m. via Zoom. Any changes will be posted on the settlement website. If you do not exclude yourself, you may request to speak at the Final Fairness Hearing. **YOU ARE NOT REQUIRED TO ATTEND THE HEARING TO RECEIVE BENEFITS FROM THE SETTLEMENT.** For instructions on speaking at the hearing, please visit the settlement website www.CheckDiversionClassAction.com.

EXHIBIT B

~~A COURT AUTHORIZED THIS LEGAL NOTICE~~

This is not a collection notice or an attempt to collect a debt.

If you received one or more letters about a check diversion program printed on California district attorney letterhead, you may get a payment from a class action settlement.

The case is *Solberg et al. v. Victim Services, Inc, et al.*, No. 3:14-cv-05266-VC (U. S. District Court, Northern District of California).

The settlement resolves a lawsuit over whether Defendants National Corrective Group Inc., Victim Services, Inc., American Justice Solution, Inc., Birch Grove Holdings, Inc., Mats Jonsson, and Karl Thomas Jonsson violated the federal Fair Debt Collection Practices Act ("FDCPA") and the California Unfair Competition Law ("UCL"). Specifically, Plaintiffs allege that Defendants violated federal and California law by collecting and attempting to collect fees that were not permitted by law. Defendants deny all allegations made by the Plaintiffs. The Court has not decided that Defendants did anything wrong.

Defendants have agreed to pay a total of \$1,100,000 to settle the lawsuit. **You must file a claim by visiting www.CheckDiversionClassAction.com by July 9, 2021 in order to get a payment.**

Check Diversion Class Action
c/o JND Legal Administration
P.O. Box 91400
Seattle, WA 98111
Return Service Requested

«Barcode»

Postal Service: Please do not mark barcode

CLAIMANT ID:

«CLAIMANT ID»

«First1» «Last1»

«CO»

«Addr1» «Addr2»

«City», «ST» «Zip»

«Country»

**This Notice is only a summary. Details about the lawsuit can be found on the website: www.CheckDiversionClassAction.com
Please do not contact the Court.**

WHO IS A CLASS MEMBER? You may be a member of the UCL Class if you were sent a final collection demand in district attorney letterhead between September 1, 2011 and May 7, 2015, and later made a payment or payments to a “Bad Check Restitution Program.” You may be a member of the FDCPA Class if, between December 1, 2013 and May 7, 2015, you were sent a collection demand on district attorney letterhead in connection with a check written for personal, family, or household purposes.

WHAT DOES THE SETTLEMENT PROVIDE? The Settlement requires the Defendants to pay \$1,100,000 into a settlement fund that will be used to pay the Class Representatives, the lawyers representing the class, the costs of issuing this notice and checks, and settlement awards to class members who file claims. **You must file a claim to get a payment.** If you are a member of the UCL Class, the amount you get from the Settlement will be based on the amount you paid in fees and how many people make claims. If you are a member of the FDCPA Class you can make a claim for a share of the \$20,000 allocated to statutory damages, even if you paid no money to Defendants. The lawyers for the Class will request payments from the fund of \$275,000 in attorneys’ fees, \$135,000 in litigation costs, and \$3,000 for each Class Representative (\$9,000 total).

YOUR RIGHTS AND OPTIONS

Submit a claim by 7/9/2021. This is the only way to get a payment. To submit a claim, visit www.CheckDiversionClassAction.com. Completing the form takes less than a minute. If you make a claim, you give up certain rights to sue the Defendants separately.

Do Nothing. Get no money from the settlement. Give up certain rights. If you do nothing, you will get no money from the settlement and you give up any rights to sue the Defendants for the same or similar legal claims based on the same set of facts as those alleged in this lawsuit. The Defendants are Victim Services, Inc., National Corrective Group, Inc., American Justice Solutions, Inc., Birch Grove Holdings, Inc., Mats Jonsson, and Karl Thomas Jonsson.

Ask to be Excluded by 7/9/2021. Opt out of this lawsuit. Get no benefits from it. Keep rights. This is the only option that allows you to sue the Defendants for the same or similar legal claims based on the same facts as those alleged in this lawsuit. You can either mail your exclusion request or submit it online. Your exclusion request must be postmarked or submitted online on or before July 9, 2021. If you mail your request, include your name, address, telephone number and the case name “*Solberg v. Victim Services, Inc.*” To submit an exclusion request online or for more information about this case and opting out, visit www.CheckDiversionClassAction.com or call 1-855-349-7023.

Object to the Settlement by 7/9/2021. Stay in this lawsuit. File a written objection to the settlement with the Court or appear at the hearing. If you think the settlement should be rejected, you can tell the Court why you don’t like the Settlement Agreement. The Court cannot change the settlement. You can still submit a claim if you file an objection, but you cannot exclude yourself and object. If the settlement is approved, you will be bound by the Settlement Agreement and you give up rights to sue the Defendants in this lawsuit separately based on the same facts. For instructions on how to file an objection, visit www.CheckDiversionClassAction.com.

Attend the Final Approval Hearing. The hearing is scheduled for August 5, 2021 at 2 p.m. via Zoom. Any changes will be posted on the settlement website. If you do not exclude yourself, you may request to speak at the Final Fairness Hearing. **YOU ARE NOT REQUIRED TO ATTEND THE HEARING TO RECEIVE BENEFITS FROM THE SETTLEMENT.** For instructions on speaking at the hearing, visit the settlement website www.CheckDiversionClassAction.com.

EXHIBIT C

~~A COURT AUTHORIZED THIS LEGAL NOTICE~~
~~This is not a collection notice or an attempt to collect a debt.~~

If you received one or more letters about a check diversion program printed on California district attorney letterhead, you may get a payment from a class action settlement.

The case is *Solberg et al. v. Victim Services, Inc, et al.*, No. 3:14-cv-05266-VC (U. S. District Court, Northern District of California).

The settlement resolves a lawsuit over whether Defendants National Corrective Group Inc., Victim Services, Inc., American Justice Solution, Inc., Birch Grove Holdings, Inc., Mats Jonsson, and Karl Thomas Jonsson violated the federal Fair Debt Collection Practices Act (“FDCPA”) and the California Unfair Competition Law (“UCL”). Specifically, Plaintiffs allege that Defendants violated federal and California law by collecting and attempting to collect fees that were not permitted by law. Defendants deny all allegations made by the Plaintiffs. The Court has not decided that Defendants did anything wrong.

Defendants have agreed to pay a total of \$1,100,000 to settle the lawsuit. **You must file a claim by visiting www.CheckDiversionClassAction.com by August 16, 2021 in order to get a payment.**

Check Diversion Class Action
c/o JND Legal Administration
P.O. Box 91400
Seattle, WA 98111
Return Service Requested



CLAIMANT ID:
[REDACTED]

WHO IS A CLASS MEMBER? You may be a member of the UCL Class if you were sent a final collection demand or district attorney letterhead between September 1, 2011 and May 7, 2015, and later made a payment or payments to a “Bad Check Restitution Program.” You may be a member of the FDCPA Class if, between December 1, 2013 and May 7, 2015, you were sent a collection demand on district attorney letterhead in connection with a check written for personal, family, or household purposes. **WHAT DOES THE SETTLEMENT PROVIDE?** The Settlement requires the Defendants to pay \$1,100,000 into a settlement fund that will be used to pay the Class Representatives, the lawyers representing the class, the costs of issuing this notice and checks, and settlement awards to class members who file claims. **You must file a claim to get a payment.** If you are a member of the UCL Class, the amount you get from the Settlement will be based on the amount you paid in fees and how many people make claims. If you are a member of the FDCPA Class you can make a claim for a share of the \$20,000 allocated to statutory damages, even if you paid no money to Defendants. The lawyers for the Class will request payments from the fund of \$275,000 in attorneys’ fees, \$135,000 in litigation costs, and \$3,000 for each Class Representative (\$9,000 total). **YOUR RIGHTS AND OPTIONS Submit a claim by 8/16/2021.** This is the only way to get a payment. To submit a claim, visit www.CheckDiversionClassAction.com. Completing the form takes less than a minute. If you make a claim, you give up certain rights to sue the Defendants separately. **Do Nothing.** Get no money from the settlement. Give up certain rights. If you do nothing, you will get no money from the settlement and you give up any rights to sue the Defendants for the same or similar legal claims based on the same set of facts as those alleged in this lawsuit. The Defendants are Victim Services, Inc., National Corrective Group, Inc., American Justice Solutions, Inc., Birch Grove Holdings, Inc., Mats Jonsson, and Karl Thomas Jonsson. **Ask to be Excluded by 8/16/2021.** Opt out of this lawsuit. Get no benefits from it. Keep rights. This is the only option that allows you to sue the Defendants for the same or similar legal claims based on the same facts as those alleged in this lawsuit. You can either mail your exclusion request or submit it online. Your exclusion request must be postmarked or submitted online on or before August 16, 2021. If you mail your request, include your name, address, telephone number and the case name “*Solberg v. Victim Services, Inc.*” To submit an exclusion request online or for more information about this case and opting out, visit www.CheckDiversionClassAction.com or call 1-855-349-7023. **Object to the Settlement by 8/16/2021.** Stay in this lawsuit. File a written objection to the settlement with the Court or appear at the hearing. If you think the settlement should be rejected, you can tell the Court why you don’t like the Settlement Agreement. The Court cannot change the settlement. You can still submit a claim if you file an objection, but you cannot exclude yourself and object. If the settlement is approved, you will be bound by the Settlement Agreement and you give up rights to sue the Defendants in this lawsuit separately based on the same facts. For instructions on how to file an objection, visit www.CheckDiversionClassAction.com. **Attend the Final Approval Hearing.** The hearing is scheduled for August 19, 2021 at 2 p.m. via Zoom. Any changes will be posted on the settlement website. If you do not exclude yourself, you may request to speak at the Final Fairness Hearing. **YOU ARE NOT REQUIRED TO ATTEND THE HEARING TO RECEIVE BENEFITS FROM THE SETTLEMENT.** For instructions on speaking at the hearing, visit the settlement website www.CheckDiversionClassAction.com.

*This Notice is only a summary. Details about the lawsuit can be found on the website: www.CheckDiversionClassAction.com
Please do not contact the Court.*

EXHIBIT D



CHECK DIVERSION CLASS ACTION
(CASE No. 3:14-cv-05266-VC)

TIMELY AND VALID EXCLUSIONS

	<u>UNIQUE ID</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>E-SUBMISSION/POSTMARK DATE</u>
1.	39570084	James Elton Perry Jr	Fontana, CA	5/14/2021
2.	36130506	Henry Gambing	San Francisco, CA	5/14/2021

EXHIBIT E

CHECK DIVERSION CLASS ACTION

CLAIM FORM

Solberg et al. v. Victim Services, Inc., et al.

Case No. 3:14-cv-05266-VC (N.D.Cal.)

To qualify for payment, Class Members are required to submit a valid Claim Form. You may submit a claim online at www.CheckDiversionClassAction.com or complete and mail this form to the address below. Your claim must be submitted online, by e-mail, or postmarked no later than **July 9, 2021**:

Check Diversion Class Action
c/o JND Legal Administration
P.O. Box 91400
Seattle, WA 98111
E-mail: info@CheckDiversionClassAction.com

I. CLASS MEMBER INFORMATION

Full Name: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

E-mail Address: _____

II. SIGNATURE

Signed: _____ Date: _____

Print Name: _____