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By D. Donaldson ,Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

DANIEL PATZ, JOAN MANN CHESNER, *ET AL.*,

PLAINTIFF,

V.

CITY OF SAN DIEGO,

DEFENDANT.

Case No. 37-2015-00023413-CU-MC-CTL

CERTIFIED CLASS ACTION

DECLARATION OF CAROLE THOMPSON IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT

Date: July 31, 2026
Time: 9:00 a.m.
Dept: C-67
Judge: Hon. Michael T. Smyth

I, Carole Thompson declare and state as follows:

1. I am the Program Manager of Case Management, Class Action Services of CPT Group, Inc. ("Settlement Administrator" or "CPT"). The following statements are based on my personal knowledge, the information provided to me by counsel and other CPT employees working on this matter, and records of CPT generated and maintained in the usual course of its business. If called on to do so, I could and would testify competently thereto.

2. For this matter, CPT is able and willing to provide Notice and Claims Administration services as provided in the Class Action Settlement Agreement ("Settlement Agreement"), if Plaintiffs' motion is approved by the court.

3. CPT Group, Inc. is located at 50 Corporate Park, Irvine, CA 92606.

4. I have been employed by CPT for 10 years. As Program Manager, I am responsible for the oversight and supervision of the team of Case Managers who carry out the duties and tasks related to the administration of consumer settlement matters. I submit this declaration at the request of Plaintiff's Counsel in support of the Motion for Preliminary Approval of Class Action Settlement.

CPT'S EXPERIENCE RELEVANT TO THIS CASE

5. CPT is a leader in the settlement administration industry and has extensive experience in providing court approved notice of class actions and administering various types of notice programs and settlements. In the past 30-plus years, we have provided notification and/or claims administration services in thousands of class action cases.

6. CPT offers a wide range of class action administrative services for developing, managing, and executing all stages of integrated settlement plans. A true and correct copy of CPT's company resume ("CPT CV") is attached as **Exhibit A**, which provides detailed information concerning our class action claims administration qualifications, experience, as well as our Information Security Statement that details CPT's procedures for the protection of confidential Settlement Class Member information.

7. Due to the sensitive nature of settlement administration, CPT follows a series of strict protocols to protect the integrity of our work that include, but are not limited to, the following:

employing security controls and procedures throughout our business that comply with AICPA SOC 2 Type II; requiring of secure file transfer of all Settlement Class Member data, account and wire information; multifactor authentication to secure all email accounts; monitoring each endpoint with modern Data Loss Prevention ("DLP") software; implementation of strict policy regarding the transmittal and storage of SI; requiring staff to complete regular cyber security training; monthly external and internal vulnerability scans to ensure the integrity of our security measures. To protect against potential losses, CPT holds $5,000,000 in Errors and Omissions insurance, $1,000,000 in Crime/Fidelity insurance, and $5,000,000 in cyber insurance.

NOTICE AND ADMINISTRATION OVERVIEW

8. CPT was selected in the above captioned matter to provide administration services for this settlement. In this capacity, CPT will complete the tasks as detailed in the Settlement Agreement, including but not limited to the following: (a) prepare, print and otherwise disseminate notification of the pending settlement to the Settlement Class Members; (b) establish a dedicated toll-free 24-hour support line with Interactive Voice Response ("IVR") capabilities; (c) The creation of a QR Code that will allow quick and direct access to the Settlement Website through a mobile device; (d) establish a dedicated Settlement Website that will allow members to select their preferred payment method (e.g., electronic payment methods such as direct deposit, PayPal or Zelle), among many things, inform Settlement Class Members of the terms of the Settlement; (e) receive objections submitted by Settlement Class Members; (f) receive requests for exclusion submitted by Settlement Class Members; (g) notify the parties of Settlement Class Members who file timely requests for exclusion; (h) receive other communications about the settlement; (i) provide secure data management and reporting; (j) file any required reports with the court; (k) establish a Qualified Settlement Fund for payment of authorized claims; (l) calculate the amounts due to each Settlement Class Member pursuant to the settlement; (m) make payments to Settlement Class Members through the established fund and file all applicable tax returns; and (n) handle any uncashed checks as directed by the court.

CLASS NOTICE

9. CPT understands that in this settlement a Settlement Class Member means:

> All single-family residential customers of the City of San Diego who received water service between August 14, 2014, and December 1, 2023. Excluded from the Class are: officers and directors of the City of San Diego, Class Counsel, Judge Michael T. Smyth, and any members of Judge Smyth's immediate family and judicial staff. Also excluded from the Class are individuals who timely submitted valid opt-outs by the Response Deadline when the class was originally certified.

10. It is also CPT's understanding that the parties expect that the majority of Settlement Class Members can be identified and located from Defendant's records. Upon receipt of the Settlement Class Member information CPT will assign a unique identifier to each person in the list that will be used throughout the duration of the administration process. The proposed notification program will include the components as described below. Each of the proposed notice forms, and a template opt out form, are attached as **Exhibit B**.

11. **Email Notice:** CPT will send an Email Notice to all Settlement Class Members for whom a valid email address is provided. Prior to disseminating the Email Notice, CPT will run the list of known email addresses through a cleansing scan to identify any known abuse or otherwise invalid email addresses.

12. **Direct Notice**: CPT will send a Postcard Notice via U.S. mail to all Settlement Class Members who have a valid mailing address but no valid email. Prior to mailing, to increase the success rate of deliverability, CPT will scrub the records to reduce anomalies and duplicates and update the mailing addresses using National Change of Address (NCOA). Any mailed notices that are returned as undeliverable from the post office will be promptly re-mailed if returned with a forwarding address or skip traced in an attempt to find the current addresses and promptly re-mailed if ascertained. Any Email Notices returned as undeliverable will be followed by a Postcard Notice if a valid mailing address exists.

13. **Publication:** CPT will undertake additional efforts to further disseminate notice to Settlement Class Members, including a print publication in San Diego Union Tribune.

14. **Website**: CPT will set up and administer a dedicated settlement website that will be informative and easy for potential members of the Settlement Class to navigate. The Settlement

Website will include links to the Settlement Agreement, the Preliminary Approval Order, Long Form Notice, Opt-Out Form, and other relevant filings as instructed by the parties or the Court. The website address or a hyperlink will also be displayed on all notifications described above.

15. **Toll-Free Number/IVR**: CPT will establish a dedicated 24-hour, toll-free support line with Interactive Voice Response ("IVR") capabilities to provide potential members of the Settlement Class with: (a) general and detailed information about the Action; (b) answers to frequently asked questions; and (c) information relating to filing an opt out. In addition, CPT will maintain a dedicated email inbox for handling inquiries from potential Settlement Class Members and claimants.

PROCESSING OF RESPONSES FROM CLASS

16. CPT also understands that Objections and Opt-Outs must be served in writing as instructed in the Notice. CPT will maintain a record of and inform the parties of all Opt-Out requests submitted by Settlement Class Members, as well as any Objections CPT may receive.

ADMINISTRATION FEES

17. CPT estimates its costs for the notice and administration of this Settlement will be approximately $199,000 based on 436,069 Settlement Class Members and an opt-out filing rate of 0.5%. CPT understands that the costs related to claims administration will be paid by the Settlement Fund.

CONCLUSION

18. The proposed Notice Plan includes individual direct notice to all members of the Settlement Class who can be identified through reasonable efforts as well as a Publication, Settlement Website and toll-free hotline. Based on our experience with similar cases, the notice program described herein is consistent with other court-approved notice programs and will provide Settlement Class Members with notice of their legal rights and comports with due process requirements.

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

Executed on July 9, 2026, at Irvine, California.

Carole Thompson

EXHIBIT A

CURRICULUM VITAE

50 Corporate Park
Irvine, CA 92606

www.CPTGROUP.com

1 (800) 542-0900

COMPANY PROFILE

CPT Group, Inc. ("CPT"), founded in 1984, is a leading provider of notice and settlement class action administration services and has been appointed as the third-party administrator by all major courts. Throughout our history, CPT has disbursed billions of dollars in settlement funds, serviced over 250,000,000 class members, and administrated over 7,000 cases. CPT offers a wide range of class action administrative services for developing, managing, and executing all stages of integrated notice plans and settlements. This includes pre-certification and discovery mailings, class-certification mailings, claims processing and administration, data management, data reporting, settlement fund administration, legal noticing campaigns, website design, and web hosting. The project management team, call center, data entry center, IT, and production facilities are all located at the corporate headquarters in Irvine, CA.

QUALITY ASSURANCE & SECURITY

The integrity of CPT's work and our stringent quality assurance protocols are strengthened by the staff's ability to operate in close proximity keeping the work managed in-house. With a commitment to rigorous security protocols and controls, CPT upholds an obligation to its clients to maintain data and cyber security practices that comply with AICPA SOC 2 - Type II.

DIVERSITY & INCLUSION

CPT believes that promoting diversity starts with a commitment to building understanding and awareness. Diversity is not just cultural or ethnic, it includes people of all ages and backgrounds. We are guided by a commitment to removing barriers to the recruitment, retention, and advancement of talented individuals from historically excluded populations. CPT recruits and rewards team members based on capability and performance, regardless of race, gender, sexual orientation, gender identity or expression, lifestyle, age, educational background, national origin, religion, or physical ability.

AREAS OF EXPERTISE

- **PROJECT MANAGEMENT -** At the heart of our administrative capabilities is the ability to manage and process our cases as a neutral TPA with efficiency, accuracy, and in compliance with the terms of the parties' agreement. Our skilled approach in the use of technology, effective management, and quality assurance is the core of our operation.
- **Claims Administration** – CPT conducts extensive Quality Assurance processes throughout the duration of the claims period. Any responses received from Class Members are processed according to our strict internal procedures and in accordance with the Settlement Agreement. Counsel is provided with all required reporting, including, where applicable, a list of approved claimants and the settlement calculations for each.
- **Call Center** – CPT's case support representatives stand ready to service all case inquiries offering live, multi-lingual, 1-1 response, 5 days a week during business hours (extended hours available). Interactive Voice Response (IVR) assures that class members receive the assistance and support they require 24 hours a day. A proprietary call tracking system combined with highly trained representatives ensures an accurate class member history for each and every call.
- **Data Management/Reporting** – Through programmatic analysis, CPT will standardize the class data to compile a master mailing list. CPT prepares weekly status reports for each case that summarize the status of returns and responses such as mail pieces and claim form submissions. CPT is SOC 2 Type II certified, which ensures necessary measures are taken to safeguard all class member data.
- **Noticing Expertise** – CPT's legal notice experts have a combined experience of over 25 years in the industry and come together to plan a successful notice campaign based on the requirements of the Settlement. After strategizing and consulting with Counsel, our team will determine the best method of notification to reach your intended target audience. Whether notification will be through means of a known or unknown data set, CPT will execute the campaign with precision and accountability.
- **Settlement Fund Administration** – CPT's team of tax and accounting professionals manages all fund distributions through a rigorous and supervised process. Stringently following the terms of the Court Order, CPT maintains its Qualified Settlement Fund (QSF) accounts through federally insured banks with access restricted to authorized personnel only. On behalf of the QSF, CPT will handle all remittances and reporting to local, state, and federal tax authorities.

EXPERIENCE

CPT Group, Inc. has a proven track record of successfully administering complex class action settlements across a broad range of practice areas, including cases with millions of class members. With over four decades of experience, CPT is trusted by courts nationwide as a third-party administrator for high-stakes, large-fund settlements. Below are highlights from several relevant cases we've handled:

CONSUMER PROTECTION

Stevens v. Britax Child Safety, Inc., Case No. 2:20-cv-07373-MCS-AS (C.D. Cal)

Administration tasks for this hybrid settlement included dissemination of the summary notice by email or mail to known consumers and implementation of an extensive digital and social media campaign to reach unknown consumers, which encompassed internet publication through DV360, paid and keyword search (Google/Bing), and social media advertising on Facebook, Instagram, and OLV (YouTube). Additional efforts included a press release and four consecutive print publications in the Los Angeles Times. Further, a dedicated settlement website was established to access court-approved documents, facilitate online claims submission, and offer real-time case information to potential settlement class members.

Pope, et al. v. Cura Partners, Inc., State of Oregon, Multnomah County Circuit Court, Case No. 20CV05932

While administrating this consumer settlement, CPT designed and implemented a multi-faceted notice program to effectively reach and engage the potential class population of 172,000 members. The comprehensive outreach strategy integrated multiple communication channels, anchored by a targeted digital media campaign that strategically placed settlement information where potential class members were most likely to encounter it. This digital approach was complemented by traditional print publication, creating multiple touchpoints for class awareness. Central to the administration strategy was an interactive settlement website that served as the primary hub for class member engagement and streamlined claims submission. The settlement's modern approach extended to its payment distribution, offering claimants flexibility through multiple digital payment options. This technology-forward distribution strategy provided class members convenient, secure payment choices while optimizing administrative efficiency.

Treviso v. Pro Football Hall of Fame, Case No. 5:17-cv-00472 (N.D. Ohio)

CPT executed a sophisticated administration strategy for this consumer settlement, beginning with a meticulously researched notice campaign tailored to reach the presumed target audience. The comprehensive digital strategy integrated paid search campaigns, programmatic display advertising, strategic social media placements, and online video (OLV) content. This layered approach proved highly effective, generating an impressive 5,080,887 impressions during the 40-day recruitment campaign. To further enhance accessibility, the notice program incorporated direct communication methods through email and text message notifications, ensuring multiple touchpoints for potential class members. The settlement's complexity was particularly evident in its claims validation requirements, which demanded a thorough review of multiple documentation types, including proof of travel, accommodation records, and event attendance verification through tickets or other supporting evidence. This rigorous validation process, combined with the sophisticated notice program and user-friendly claims platform, demonstrated CPT's ability to manage intricate settlement requirements while maintaining efficient and accessible administration practices.

DATA BREACH

Patricia Tafelski, et al. v. Logan Health Medical Center, Montana Eighth Judicial District Court, Case No. 19CV45421 and ADV-22-0124

CPT administered this data breach settlement reaching approximately 213,500 class members through a comprehensive notice program featuring double postcards and strategic reminders. The administration centered on an interactive settlement website that served as an information hub for class members. CPT implemented a flexible benefits distribution system offering multiple payment options, including electronic transfers, paper checks, and credit monitoring activation codes. To maximize participation, CPT executed targeted follow-up campaigns via email and phone to encourage check cashing.

Harkey-Kirk v. California Department Of Public Health, Sacramento County Superior Ct, Case No. Case No.: 34-2019-00260616

In addressing this privacy matter under the Confidentiality of Medical Information Act, CPT implemented a comprehensive strategy to issue a notice of class certification. Our approach included targeted outreach through traditional print publication, a robust media campaign across platforms like Facebook, Instagram, and YouTube, and a precision-driven paid search campaign on both Bing and Google. Additionally, our programmatic display advertising, facilitated through a DSP platform, created a dynamic and visually engaging presence across various online spaces. The campaign's visibility was enhanced by a press release distributed via PR Newswire, ensuring comprehensive information reached both the public and the media.

Hinds v. Community Medical Centers, Inc., San Joaquin County Superior Court , Case No. STK-CV-UNPI-2021-0010404

CPT Group effectively managed this $1.9 million data breach settlement through multiple communication channels, including direct mail notices to over 600,000 class members and a dedicated settlement website where claimants could access court documents and submit claims electronically. A 24-hour toll-free support line with IVR capabilities provided continuous assistance. These comprehensive efforts resulted in over 11,000 claim submissions, with claimants choosing between cash benefits or credit monitoring services.

EXPERIENCE

LABOR & EMPLOYMENT

Nevarez, et al. v. Costco Wholesale Corporation, Los Angeles County Superior Court, Case No. 19STCV10017
To apprise settlement class members of the $8,750,000 wage and hour settlement, CPT implemented a dual-notification approach that leveraged email and physical mail communications to effectively reach the substantial class size of 96,677 members. Over $5,000,000 was designated as the net settlement amount for distribution among participating class members from the gross settlement amount. The settlement administration was particularly notable for its inclusion of gift card distribution to qualified participants, adding complexity to the distribution process by requiring the management of both monetary and non-monetary benefits.

Helmick v. Air Methods Corp., Alameda County Superior Court, Case No. RG13665373
(Top Settlements, 2020) Administration of this $78,000,000 employment settlement demonstrated the complexity of managing high-value, multi-year distributions. The notice program began with direct mail outreach to settlement class members, a comprehensive settlement website, and toll-free class member support. The settlement's significant monetary component required careful administration, with distributions totaling over $49,000,000 executed over three years. The substantial individual awards, averaging approximately $100,000 per claimant, reflected the serious nature of the underlying claims and required meticulous verification and distribution protocols. The high average award amount and multi-year distribution schedule distinguished this as one of the more complex employment settlements of 2020.

Wackenhut Wage and Hour Cases, Los Angeles County Superior Court, Case No. JCCP Np. 4545
(Top Settlements, 2019) CPT implemented a sophisticated communication strategy that integrated multiple outreach channels to notify settlement class members in this $130,000,000 wage and hour settlement. The notice program leveraged both email and SMS text messaging in English and Spanish, ensuring broad accessibility across the linguistically diverse class population. A comprehensive settlement website served as an information hub, featuring an online claim portal. CPT supported class member engagement through a dedicated toll-free hotline. The effectiveness of these notice methods was demonstrated by the impressive 57% claimant response - a strong result that helped secure final approval from the court. This settlement's size and successful administration marked it as one of the largest employment settlements in California that year.

Sanchez v McDonald's Restaurants of California, Los Angeles County Superior Court, Case No. BC499888
(Top Settlements, 2019) Notice methods in this $26,000,000 wage and hour settlement featured a multi-channel approach. Primary notice was delivered through direct mail and email in English and Spanish, accommodating the workforce's linguistic diversity. A dedicated settlement website was a comprehensive resource, hosting case documents, court filings, frequently asked questions, settlement agreement details, and opt-out/objection forms. All website materials were available in both English and Spanish. For additional support, a toll-free hotline was staffed by trained bilingual representatives.

Alvarez, et al v. XPO Logistics Cartage, LLC, 2:18-cv-03736-RGK-E (C.D. Cal)
In administering this $20 million wage and hour settlement, CPT executed a comprehensive bilingual notice program, disseminating materials in both English and Spanish while managing the critical task of collecting W-9s from prospective class members. CPT implemented a strategic follow-up campaign to optimize response rates, including targeted reminder postcards to non-responding individuals. The settlement distribution was executed in two phases: an initial disbursement to all eligible class members and a supplemental distribution to those who had promptly negotiated their initial settlement payments.

Abdullah v U.S. Security Associates, Inc., San Diego County Superior Court, Case No. 2:15-cv-09-00984 PSG-E
(Top Settlements, 2018) CPT successfully administered this substantial $21 million settlement, implementing a comprehensive notice and communication program for a class exceeding 22,000 members. The multi-channel outreach strategy included direct mail notification, a dedicated settlement website, and a toll-free support line to ensure class members had ready access to case information and assistance. The administration required sophisticated tax compliance measures, with CPT managing the intricate coordination of settlement benefit distribution alongside required tax documentation. This included the timely issuance of settlement payments with corresponding W2 and 1099 tax forms to all eligible class members, maintaining strict adherence to tax regulations and reporting requirements.

Cruz & Johnson v. Wal-Mart Associates, Inc., et. al., Los Angeles & San Bernardino County Superior Courts of California, Case Nos. 18STCV03128 and CIVDS1602699
(Top Settlements, 2021) In this significant 2021 PAGA settlement, CPT administered a $15 million resolution reaching over 320,000 aggrieved employees through direct mail notification. The administration included comprehensive tax compliance, with CPT coordinating the distribution of settlement checks and corresponding 1099 forms to eligible participants. This consequential wage-and-hour settlement exemplified the effectiveness of PAGA enforcement in addressing workplace compliance issues.

Valdez v. Starbucks Corporation, Superior Court of the State of California, County of Riverside, Case No. PSC1908409
CPT administered a $3 million PAGA settlement benefiting 138,000 aggrieved employees. The distribution process included coordinated issuance of settlement checks and corresponding 1099 tax forms. CPT managed the disposition of uncashed funds through a Cy Pres distribution, ensuring the full settlement value served its intended public benefit.

QUALIFICATIONS & EXPERIENCE OF KEY PERSONNEL

JULIE N. GREEN
President
Notice Expert

Julie brings 20 years of leadership excellence to CPT Group as one of the industry's foremost experts in legal notice administration. Having personally designed and overseen thousands of class action notice programs, Julie's expertise spans compliance, notice strategy, and regulatory adherence, enabling CPT to successfully administer even the most complex settlements.

As President, Julie oversees all operational aspects while maintaining her commitment to neutrality and client confidentiality. Her background, with degrees in Drama, and Psychology & Social Behavior from the University of California, Irvine, provides unique insights into effective communication and stakeholder management. Julie's innovative leadership continues to drive CPT's position at the forefront of class action administration.

RANDI J. MARTZ,
EVP Business Development & Strategy
Notice Expert

Randi brings over 17 years of experience to CPT Group. Her role is crucial in analyzing settlement requirements for legal notification through various research methods and data analysis. Randi's expertise lies in finding efficiencies to implement cost savings for RFPs and developing strategic plans to grow the business.

As a liaison between the Business Development and Operations Teams, Randi plays a vital role in identifying critical opportunities to strengthen settlement and client objectives. Her educational background in Business Administration from California State University, Fullerton, provides a solid foundation for her multifaceted role at CPT.

MARK BRANDENBERGER,
Chief Financial Officer

Mark Brandenberger serves as CPT Group's Chief Financial Officer. A CPA who began his career at Deloitte and Touche, Mark developed his financial and operational expertise over 25 years in financial services, working with companies from start-ups to Fortune 100. He later owned and successfully operated a fire and water restoration company before selling it.
Mark holds a Bachelor of Business Administration in accounting from Cal Poly San Luis Obispo and recently became a certified business coach, leveraging his experience to help business owners exceed their potential through strategic guidance and mentorship.

JACQUELINE N. KOH
VP Operations

Jackie brings nearly two decades of hands-on experience and strategic leadership to CPT Group. Since joining the company 18 years ago, Jackie has become a vital force in shaping CPT's operational excellence and client service delivery. In her role, she oversees key operational departments including Case Management, Disbursement, Claims Processing, Mailing, and the Call Center. Jackie drives operational strategies that align with CPT's growth trajectory and industry reputation. Her deep understanding of the full settlement lifecycle—from court approval and process optimization to client coordination and fund distribution—positions her as a trusted advisor throughout the administration process. Jackie's legal foundation includes prior roles as a paralegal at the Orange County District Attorney's Office and several top law firms. She holds a B.A. in International Relations and Law & Public Policy from the University of Southern California and completed her Paralegal Studies at UCLA.

TREVOR JONES
Chief Technology Officer

Trevor leads CPT's technology vision, systems architecture, and business intelligence strategy to support high-volume, complex case administration. With over two decades of technology leadership experience, including executive roles at VIZIO and Veritone overseeing business operations, IT, and AI-driven analytics, Trevor brings proven expertise in driving innovation, scalability, and operational efficiency.

His specialized knowledge in enterprise innovation, data analytics, and operational strategy strengthens CPT's technological capabilities while ensuring continued excellence in class action administration. Trevor's leadership enables CPT to leverage cutting-edge solutions that enhance both service delivery and operational performance.
Trevor holds a B.S. in Mathematics/Economics from UCLA and actively contributes to the Orange County tech community as a coach and thought leader.

QUALIFICATIONS & EXPERIENCE OF KEY PERSONNEL

ABEL E. MORALES,
Director of Operations

Abel Morales is the Director of Operations at CPT Group. Since joining CPT in 2010, Abel has handled hundreds of class action cases from inception through distribution and has become an expert in complex settlements. He is the primary client contact and is well trusted for his expertise in the class action industry. Abel oversees the Claims Processing Department, Production Department, and Class Member Support Services. His wide range of expertise provides valuable insight into all facets of the Administration process. Prior to CPT Group, Abel was a Senior Analyst for 9 years at a prominent Fortune 500 mutual insurance holding company. Abel also holds a B.A. in International Finance from the California State University of Fullerton. He is bilingual in Spanish.

ALEJANDRA ZARATE
Supervising Case Manager

Alejandra Zárate is one of CPT Group's Supervising Case Managers. In her role, she is responsible for the onboarding and intake of new cases, as well as the training of new Case Managers. Alejandra started with CPT Group in 2007 in the Claims Department and joined the Case Management team in 2009. Her experience at CPT Group positions her well to oversee the critical role of case intake and development of new team members and introducing them to the department's policies and procedures.
Alejandra received her degree in Computer Engineering from Autonomous University of Baja California in Ensenada, B.C. Mexico. While earning her degree, she worked as a web development assistant and helped develop a web page for students interested in taking off-campus classes.

TARUS DANCY
Supervising Case Manager

As a Supervising Case Manager at CPT Group, Tarus leads a team of Case Managers that oversee a breadth of cases, including Wage & Hour, pre-settlement Belaire, and Class Certification matters. With over a decade of experience in project management, Tarus brings a track record of guaranteeing projects are completed on schedule and in accordance with case specifications. In addition, his exceptional communication and leadership abilities support the continuity of the various projects he oversees. Tarus holds an M.B.A. in Project Management from the Florida Institute of Technology and a B.A. in Communications from the University of Memphis.

TIM CUNNINGHAM,
Associate Director, Case Management

Tim Cunningham has been with CPT Group since 2010 and has successfully managed over 300 cases. As Associate Director, under his direction, a team of Case Managers and Assistants are trained and guided to oversee all case activity—from administrative conception to disbursement. Tim and his team are also the primary contact between the firm and Counsel while also working closely throughout administration with the IT, Mailing, Claims and Call Center departments. Prior to CPT Group, Tim was a Lead Relationship Manager for 10 years at a prominent Fortune 500 mutual insurance holding company.
Tim earned his B.A. in Public Administration with a minor in English from California State University, San Diego.

CAROLE THOMPSON,
Associate Director, Case Management

Carole joined CPT in 2010 as a Case Manager. In her current role, she leads a team of Case Managers and ensures the proper guidance and supervision is upheld for high accuracy and prompt adherence to court-ordered deadlines. She is also responsible for overseeing case activities and having a comprehensive understanding of each case her team handles. In her career prior, she spent 12 years in the Financial Industry at a prominent Fortune 500 annuities company. Then, when an opportunity took her family to Minot, North Dakota, she had to leave CPT, but gained 5 years of Human Resources expertise, first as Benefits Specialist at Trinity Health and then as a Benefits Coordinator at Food Management Investors, Inc. Upon returning to California in 2016, Carole rejoined CPT, providing a strong professional background to the team.

JENNIFER FORST
Supervising Case Manager

Jennifer brings a deep understanding of human behavior and organizational dynamics to her role as Supervising Case Manager at CPT Group. Her professional journey began in employee engagement and retention, where she honed her skills as a project manager and consultant. Her expertise was further solidified during her tenure as Director of Client Services for an external consulting firm, where she led a diverse team of consultants, project managers, and analysts to deliver exceptional results for clients across industries.
Jennifer embarked on a new career chapter when she joined CPT Group, drawing on her background in psychology and client services, where she oversees cases with precision and empathy.

EXHIBITS

EXHIBIT 1. CPT'S INFORMATION SECURITY STATEMENT
EXHIBIT 2. CPT'S DATA AND SETTLEMENT FUND TRANSMISSION METHODS

EXHIBIT 1

INFORMATION SECURITY STATEMENT
Confidential

CPT Group, Inc. (“Company” or “CPT”) maintains a comprehensive, written Information Security Program that complies with all applicable laws and regulations and is designed to (a) ensure the security, privacy and confidentiality of Class Member Information, (b) protect against any reasonably anticipated threats or hazards to the security or integrity of the Class Member Information, and (c) deny unauthorized access to, use, deletion, or modification of Class Member Information. As part of an ongoing effort, throughout its business CPT has implemented the following security controls and procedures:

1) Company uses Class Member Information only for the purposes for which Client provided it, as described in any Agreements and/or Court Order’s governing the provisions of the Company’s services on any particular engagement.
2) Company has designated one or more specifically named employees to be responsible for the administration of its Information Security Program.
3) Company has and maintains processes for identifying, assessing, and mitigating the risks to Class Member Information in each relevant area of the Company’s operations and evaluating the effectiveness of the safeguards for controlling these risks.
4) Company utilizes an EDR that runs and analyzes daily Risk Assessment and Threat Intelligence scans on all company computer stations, servers and protected network subnets. These scans search for any software vulnerabilities along with data containing sensitive information (“SI”).
5) All computers are provisioned with an advanced security stack. Company’s Endpoint Protection centrally reports activity, handles patch management and security policies. Company’s security stack is based on DNS and content filtering, deep packet inspection at the firewall level, antivirus/antimalware, email filtering and user behavior analysis. Each endpoint is monitored with modern Data Loss Prevention (“DLP”) software. Company’s DLP system prevents connection to unauthorized external storage, or cloud systems. It actively blocks screen prints and will not allow confidential user information to be sent out of our trusted network.
6) Login access to Company email or systems requires two factor authentication, which requires not only a password and username but also something physical, like user location, secure ID token or biometrics.
7) Company regularly monitors, tests and updates its Information Security Program.
8) Company restricts access to Class Member Information only to those employees, agents, or subcontractors who need to know the information to perform their jobs.
9) Company performs an annual audit of its Information Security Program and maintains compliance with **AICPA SOC 2 Type II.** This includes a review of the controls: vulnerability scans, secure software development life cycle, patch management, intrusion detection and prevention, encryption of storage media and devices. Company makes reasonable changes to its Information Security Program to ensure it can maintain safeguards that are appropriate for the Class Member Information at issue.
10) At Client’s request, but only when and in a manner consistent with applicable Agreements and/or Court Orders, Company will securely destroy or return all Class Member Information in its possession and certify to Client in writing that Company has done so. If Company destroys Class Member Information rather than return it, Company will use destruction methods in compliance with all applicable state and federal laws and regulations, including NIST Special Publication 800-88, Revision 1 (2015). This obligation to return or destroy information shall not apply to Class Member Information that is stored in backup or other disaster recovery systems, archives or other storage systems that make it impractical to destroy the information, but if Company retains Class Member Information for these reasons, its obligation under the Settlement Agreement will continue to apply for so long as it retains the information. Additionally, the Company will retain all hard copy documents (i.e. Claim Forms, etc.) for a period of 6 months, at which time they are scanned and shredded on Company premises in compliance with NIST and SOC Cybersecurity Framework.
11) Company performs extensive background checks (County Criminal, County Civil and National Criminal Database Search) of all its employees, including a review of their references, employment edibility, and education verification to ensure they do not pose a risk to the security of Class Member Information or Clients employees. Company will provide, upon request, a copy of its background check requirements for Clients review and approval. Nothing in this document shall compel Company to disclose the results of such background information of its employees.

12) Company conducts a monthly third-party credentialed vulnerability assessment with Trustwave. Vulnerabilities rated as high are patched/resolved within 48 hours, medium within 1 week, and low within 2 weeks. If a vulnerability cannot be resolved within our standard timeframe, a compensating control will be introduced to protect the vulnerable systems. To ensure Company receives timely information regarding new threats and vulnerabilities, Company subscribes to US-CERT notices as well as notices are received from Sonicwall and Crowdstrike. New threats are communicated to our executive and leadership team to disseminate to all employees within the company.

13) Company has implemented the following safeguards for systems that process, store or transmit Class Member Information:

- Identify and Access Management.
- Windows password complexity with a specific length, history, upper and lower characters, numbers, expiration every 45 days.
- Two-Factor authentication for remote access.
- Removable media devices, personal web-based email, instant message, or online storage (i.e. Dropbox, Google Drive, iCloud, etc.) are blocked and restricted.
- Company uses the Microsoft Office 365 to host corporate email.
- Company uses the HTTPS or SFTP standard for all data transmissions and ensures that all Client Data is encrypted while in transmission between Company's data center and the Company's computer system or other devices (as applicable) and at rest, consistent with SOC 2 Type II standard, but no less than a 128-bit key for symmetric encryption and a 1024-bit key for asymmetric encryption.
- Company requires its clients and self to transfer files with sensitive Class Member Information via a secure transmission protocol through Citrix Sharefile FTP which secures file during transfer with SSL/TFL encryption protocols and in storage using AES 256-bit encryption. Links to files expire after 7 days. Company requires all files transferred in this method to be password protected during transmission and password to be provided telephonically. Files are retrieved by Company, and then deleted manually upon successful download (or auto deleted after 7 days from upload by system).
- Upon hire and annually thereafter, security training of all employees using the online security training platform Knowbe4. Users are required to complete one hour of security training per year. Users are required to take tests online to ensure they've retained the knowledge. Topics covered are spear phishing emails, compromised website, social engineering, strong passwords, ransomware, handling sensitive information, mobile device security.
- Company actively tests security defenses. Staff participate in simulated phishing exercises to reinforce previous training. Company also conducts monthly external penetration tests and daily internal vulnerability scans to ensure the integrity of our security measures.
- Terminated employees are immediately prevented from accessing Class Member Information.
- Appropriately configured and updated firewall, antivirus, and spyware software;
- Separation of Duties.
- Business Continuity Planning.
- Disaster Recovery Planning.
- Pandemic Recovery Planning

14) Company's physical security requires that employees use an encoded card-key to gain access to the facility as all doors are mechanically locked at all times. Employees can only enter or exit through a front door or back door, both of which are protected by security cameras. Inside the facility, secure areas in the office that contain checks or sensitive material are also protected by electronic card-key badge access and limited to select employees. Security cameras monitor the areas that contain the sensitive material and audits are conducted periodically on the area. Access to the server room is strictly limited to only five individuals and protected by the encoded card-key badge access. Security cameras monitor the inside and outside of the secured area with audits being conducted periodically.

INFORMATION SECURITY STATEMENT
Confidential

15) Company staff are required to maintain in compliance with the Information Security Policies, Compliance Manual, and Non-Disclosure Agreement. The matters covered in the Code of Business Conduct and Ethics are of the utmost importance to the Company and are essential to the Company's ability to conduct its business in accordance with its stated values. We expect all officers, directors, employees, agents, contractors and consultants to adhere to these rules in carrying out their duties for the Company. The Company will take appropriate action against any officer, director, employee, agents, contractor or consultant whose actions are found to violate these policies or any other policies of the Company. Disciplinary actions may include immediate termination of employment or business relationship at the Company's sole discretion.If the Company has suffered a loss, then it may pursue its remedies against the individuals or entities responsible. If laws have been violated, then the Company will fully cooperate with the appropriate authorities.

Definitions

1) **"Class Member Information"** means Class Member name, address, or other contact information and class member claim filing information necessary for Company to perform services required by applicable Agreements or Court Orders in context to the Administration of a Settlement or other Class Action litigation.
2) **"Client"** means collectively Plaintiff Counsel and Defense Counsel, Plaintiff and Defendant.
3) **"Client Data"** means proprietary or personal data regarding Client or any of its Class Members under the Settlement Agreement, as provided by Client.
4) **"Company"** means CPT Group, Inc. a reputable third-party Claims Administrator selected by all the Parties (Plaintiff and Defense Counsel) to administer the Settlement or Notification Mailing.
5) **"Sensitive Personal Information"** means any non-public information of CPT or Client disclosed by either party to the other party, either directly or indirectly, in writing, orally or by inspection of tangible objects, or to which the other party may have access, which a reasonable person would consider confidential and/or which is marked "confidential" or "proprietary" or some similar designation by the disclosing party. Confidential Information shall not include any information which the recipient can establish: (i) was or has become generally known or available or is part of the public domain without direct or indirect fault, action, or omission of the recipient; (ii) was known by the recipient prior to the time of disclosure, according to the recipient's prior written documentation; (iii) was received by the recipient from a source other than the discloser, rightfully having possession of and the right to disclose such information; or (iv) was independently developed by the recipient, where such independent development has been documented by the recipient.



EXHIBIT 2



Secure Transmission Methods for Sensitive Information

CPT Group has established rigorous protocols for secure transmission and protection of Client Data and Wire Information. These guidelines maintain the highest level of security and confidentiality in legal and financial transactions through secure File Transfer Protocol (FTP) technology, password protection, and automatic file deletion.

Client Data Transmission

The secure transmission of Client Data is paramount in maintaining confidentiality and integrity of sensitive information. CPT implements a stringent process that utilizes secure File Transfer Protocol (FTP) technology to ensure the safe transfer of data files between counsel and CPT.

Four-Step Security Protocol:

1

Step 1: Link Provision

CPT provides counsel with a secure FTP (Sharefile) link specifically designated for the transfer of data files ensuring transmission over encrypted connection.

2

Step 2: File Upload and Password Protection

Counsel uploads required files to the Sharefile link. All uploaded files must be password-protected to add an extra layer of security ensuring file contents remain encrypted and inaccessible even if unauthorized access occurs.

3

Step 3: Password Communication

File password are communicated to CPT personnel via telephone. This separation of file transmission and password communication reduces interception risk and unauthorized access.

4

Step 4: File Retrieval and Deletion

Once CPT retrieves the uploaded files, they are automatically deleted from the Sharefile system after seven days minimizing the vulnerability window and ensures sensitive data doesn't persist unnecessarily.

These steps not only provides a secure channel for data transmission but also incorporate additional layers of security through password protection and automatic file deletion. By adhering to these protocols, CPT minimizes the risk of unauthorized access and data breaches, thereby protecting the interests of all parties involved in the legal process.

Wire Instructions Security Protocols

CPT emphasizes the importance of secure channels for transmitting sensitive financial information, recognizing the potential risks associated with electronic communication of banking details.

QSF Wire Instructions Provided to Defense Counsel:

PDF Generation and Protection

CPT creates wire password-protected PDF wire instructions.

Secure Upload to Sharefile

Protected PDF is uploaded to secure Sharefile platform.

Telephonic Password Communication

CPT personnel directly call Defense Counsel to provide PDF access password.

Confirmation Call

Defendant/Defense Counsel should call CPT prior to initiating any wire transfer.



Plaintiff's Counsel Wire Instructions Provided to CPT:

The process for communicating wire instructions to Plaintiff Counsel is designed with similar security considerations as those for incoming transfers. By establishing strict guidelines for the transmission of both outgoing and incoming wire instructions, CPT ensures that the final stage of fund distribution maintains the same level of security as the initial transfer.



Authorized Methods Only

CPT explicitly states that attempts to transmit Client Data or Wire Communications through alternative means are not accepted. This strict policy maintains consistent security protocols, reduces risk of data interception or loss, risk of fraudulent transactions or misdirected fund, ensures compliance with data and financial protection regulations, and stablishes clear chain of custody for sensitive and financial information.

Disclaimer for Unauthorized Transmissions

CPT issues clear disclaimers for any attempts to use unauthorized transmission methods, emphasizing reinforcement of established procedure importance, responsibility placement on transmitting party for potential breaches, risk awareness of unsecured transmission channels, and professional conduct and client trust maintenance.

CPT Group
Class Action Administrators

EXHIBIT B

LONG-FORM NOTICE

San Diego Superior Court

Patz v. City of San Diego

Case No. 37-2015-00023413-CU-MC-CTL

Class Action Notice

Authorized by the San Diego Superior Court

Were you a single-family residential water customer of the City of San Diego any time between August 14, 2014 and December 1, 2023?

There is a $40,000,000 settlement of a lawsuit.

You may be entitled to money.

To be part of this settlement, you should:

Read this notice.

You do not need to respond to this notice to be a part of the settlement.

Important things to know:

- If you take no action, you will still be bound by the settlement, and your rights will be affected.
- You can learn more at: [website].

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About This Notice

Why did I get this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Patz v. City of San Diego* brought on behalf of people who were single-family residential water customers of the City of San Diego at any time between August 14, 2014 and December 1, 2023, alleging that the City of San Diego's single-family residential water rates were unconstitutional. **You received this notice because you may be a member of the group of people affected, called the "class."** This notice gives you a summary of the terms of the proposed settlement agreement, explains what rights class members have, and helps class members make informed decisions about what action to take.

What do I do next?

Read this notice to understand the settlement and to determine if you are a class member. Then, decide if you want to:

Options	More information about each option
Do Nothing (but be prepared to confirm your contact information and select your preferred payment method)	The Court of Appeal affirmed a refund calculation in the appeal of this case. If you were overcharged based on that calculation, you do **not** need to submit anything further at this time to receive a refund. The settlement administrator may ask you to confirm your contact information and select your preferred method of payment. **Not all customers were overcharged. You will only receive a refund if you were overcharged based on the refund calculation accepted by the Court of Appeal.** The amount of the refund will be based on each customer's share of the net settlement fund. If you do nothing further, you will also give up

	rights resolved by settlement.
Opt Out	Get no payment. Allows you to bring another lawsuit against the City of San Diego about the same issues.
Object	Tell the Court why you don't like the settlement.

Read on to understand the specifics of the settlement and what each choice would mean for you.

What are the most important dates?

Your deadline to object or opt out: **[date]**
Settlement approval hearing: **[date]**

Learning About the Lawsuit

What is this lawsuit about?

A class action lawsuit was filed against the City of San Diego on behalf of people who were single-family residential water customers of San Diego between August 14, 2014 and December 1, 2023**.** The lawsuit claims that the City of San Diego charged unconstitutional single-family residential water rates, because those rates were not proportional to the cost of providing water service to its single-family residential customers.

Where can I learn more?
You can get a complete copy of the proposed settlement and other key documents in this lawsuit at:
[website]

The City of San Diego denies that it has overcharged any class members or that any money is owed.

Why is there a settlement in this lawsuit?

In 2026, the parties agreed to settle, which means they have reached an agreement to resolve the lawsuit. Both sides want to avoid the risk and expense of further litigation.

The settlement is on behalf of the customers who brought the case and all members of the settlement class, which includes all single-family residential customers of the City of San Diego between August 14, 2014 and December 1, 2023.

What is a class action settlement?
A class action settlement is an agreement between the parties to resolve and end the case. Settlements can provide money to class members and changes to the practices that caused the harm.

The Court previously decided that the City of San Diego had charged single-family residential customers under an unconstitutional water rate structure, and selected a refund methodology to determine which customers were overcharged. The Court has not yet decided how a new law, Government Code section 53758.5 (added by Senate Bill 1072) applies to the refund award.

What happens next in this lawsuit?

The Court will hold a Fairness hearing to decide whether to approve the settlement. The hearing will be held at:

Where: San Diego Superior Court, Hall of Justice, Fourth Floor, Department C-67, 330 W Broadway, San Diego, CA 92101.

When: 9:00 a.m. on [date].

The Court has directed the parties to send you this notice about the proposed settlement. Because the settlement of a class action decides the rights of all members of the proposed class, the Court must give final approval to the settlement before it can take effect. Payments will only be made if the Court approves the settlement.

You don't have to attend, but you may at your own expense. You may also ask the Court for permission to speak and express your opinion about the settlement. If the Court does not approve the settlement or the parties decide to end it, it will be void and the lawsuit will continue. The date of the hearing may change without further notice to members of the class. To learn more and confirm the hearing date, go to [website].

Learning About the Settlement

What does the settlement provide?

After the Court determined that the City of San Diego's single-family residential water rates were unconstitutional, San Diego changed those single-family residential water rates. The City of San Diego's subsequent rates apply to all single-family residential customers. There has been no judicial determination about the constitutionality of the City of San Diego's subsequent single-family residential water rates.

The settlement pays money to customers who, as a result of the unconstitutional water rate structure, paid more than they would have paid otherwise. Not all customers will receive refunds under the settlement, only those customers who were overcharged according to the methodology adopted by the court. For customers who were overcharged, you do not have to do anything further to receive your refund, but you may be asked to validate your contact information, and to select your preferred payment method.

The City of San Diego has agreed to pay $40,000,000.00 into a settlement fund. This money will be divided among the class members who were overcharged, and will also be used to pay for costs and fees approved by the Court, including the cost of administering this settlement (expected to be no more than $199,000, subject to court approval). Members of the settlement class will "release" their claims as part of the settlement, which means they cannot sue the City of San Diego for the same issues in this lawsuit. The full terms of the release can be found at [website].

If there is money left over after the claims process is completed, it will be donated to an organization approved by the Court. The Court has approved the Sierra Club, California Water Committee, including the San Diego chapter, as the recipient for any funds remaining after the claims process is completed.

How do I know if I am part of this settlement?

If you were a single-family residential customer of the City of San Diego between August 14, 2014 and December 1, 2023, you are a member of the class and may be entitled to money.

How much will my payment be?

The trial court adopted a refund methodology based on an expert report from the City of San Diego's expert, which the Court of Appeal affirmed. Under that method, the City of San Diego's expert calculated the amount of the refund owed to each class member at trial, based on the difference between the amount each class member actually paid, and the amount that class member would have paid for their single-family residential water service, if the City of San Diego had not charged unlawful rates. Each class member who was overcharged based on that calculation will receive a refund. The refund amount is based on the customer's share of the net settlement fund.

Not all class members experienced overcharges, and those class members who were not overcharged according to this calculation will **not** receive a refund under the settlement. All class members received the benefit of the City of San Diego changing the water rates that were in effect during this period.

Deciding What to Do

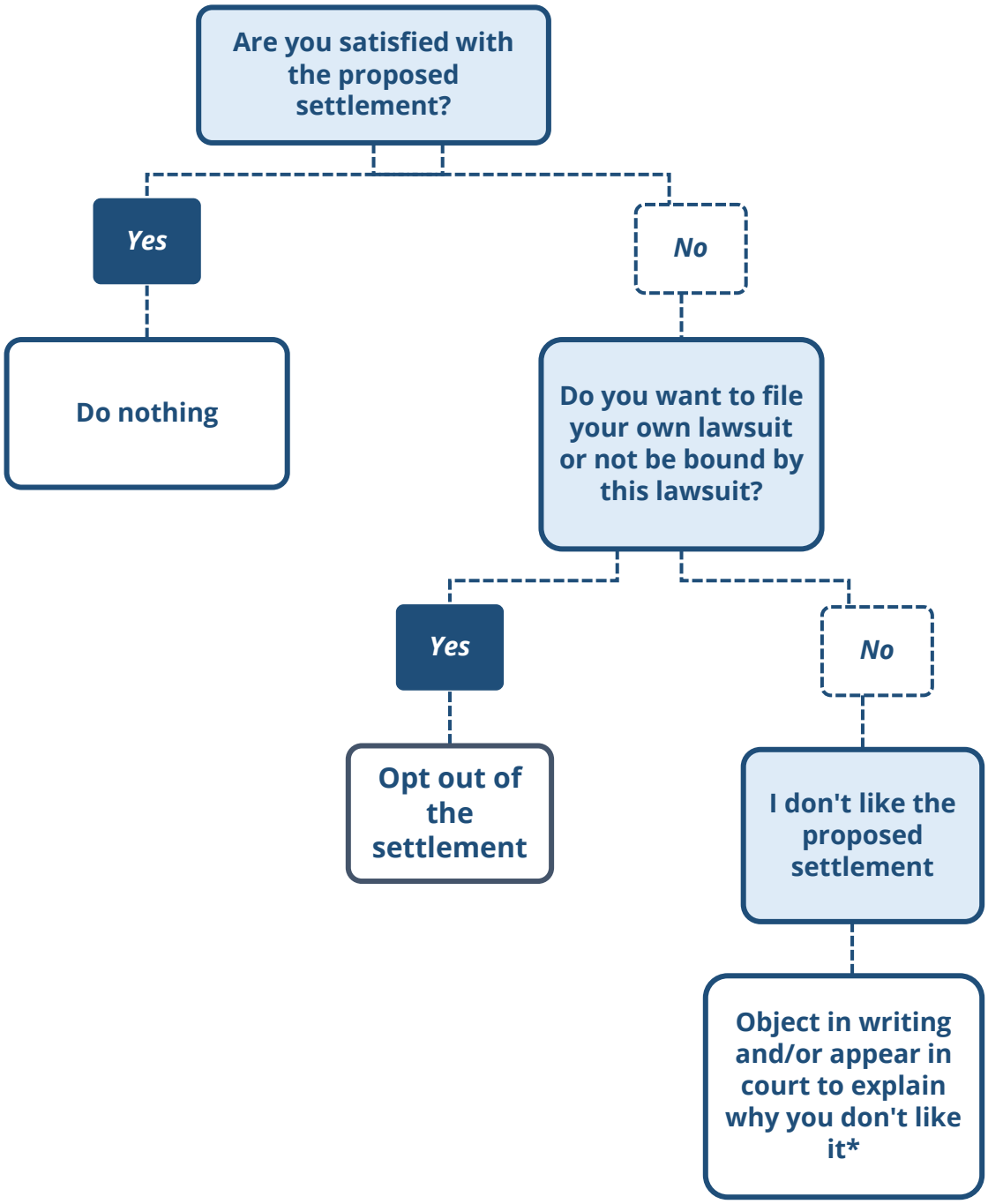
How do I weigh my options?

You have three options. You can stay in the settlement (and do nothing further, except verifying your contact information and preferred payment method if necessary), you can opt out of the settlement, or you can object to the settlement. This chart shows the effects of each option:

	Do Nothing (Stay in Settlement)	**Opt out**	**Object**
Can I receive settlement money if I . . .	YES	NO	YES
Am I bound by the terms of this lawsuit if I . . .	YES	NO	YES

Can I pursue my own case if I . . .	NO	YES	NO
Will the class lawyers represent me if I . . .	YES	NO	NO

What is the best path for me?



**You can object to the settlement AND remain a class member to receive payment.*

Participating in the Settlement

How do I get a payment if I am a class member?

If you wish to receive money, you do not need to take any further action. The Settlement Administrator may ask you to confirm your current contact information in order to ensure that you receive your refund. You may also be asked to select your preferred payment method (e.g., paper check vs. electronic payment methods).

You may enter your customer ID at [website] to see whether you are estimated to receive a refund under the Settlement, or contact the Settlement Administrator (address below).

Do I have a lawyer in this lawsuit?

In a class action, the court appoints class representatives and lawyers to work on the case and represent the interests of all the class members. For this settlement, the Court has appointed the following individuals and lawyers.

Your lawyers:

Andre M. Mura
Steven M. Tindall
Ezekiel S. Wald
Gibbs Mura LLP
1111 Broadway, Suite 2100
Oakland, CA 94067

Daniel L. Rottinghaus
Howard J. Silldorf
Anne L. Rauch
Theresa M. Filicia

Berding & Weil, LLP
160 Hotel Circle North, Ste. 701
San Diego, CA 92108

These are the lawyers who negotiated this settlement on your behalf.

If you want to be represented by your own lawyer, you may hire one at your own expense.

Do I have to pay the lawyers in this lawsuit?

Lawyers' fees and costs will be paid from the Settlement Fund. **You will not have to pay the lawyers directly.**

To date, your lawyers have not been paid any money for their work or the expenses that they have paid for the case. To pay for some of their time and risk in bringing this case without any guarantee of payment unless they were successful, your lawyers will request, as part of the final approval of this Settlement, that the Court approve a payment of up to $13,333,333.33 total in attorneys' fees plus the reimbursement of out-of-pocket expenses, not to exceed $500,000.

Lawyers' fees and expenses will only be awarded if approved by the Court as a fair and reasonable amount. You have the right to object to the lawyers' fees even if you think the settlement terms are fair.

Your lawyers will also ask the Court to approve a payment of $7,500.00 to each of the Class Representatives for the time and effort they contributed to the case. If approved by the Court, this will be paid from the Settlement Fund.

Opting Out

What if I don't want to be part of this settlement?

You can opt out. If you do, you will not receive payment and cannot object to the settlement. However, you will not be bound or affected by anything that happens in this lawsuit and may be able to file your own case.

How do I opt out?

To opt out of the settlement, you must complete the opt out form included on [website] and send it by [date] to the Settlement Administrator at:

PO Box 19504, Irvine, CA 92623
Toll-Free: 1-888-903-0334
Email:

Be sure to include your name, address, telephone number, and signature.

Objecting

What if I disagree with the settlement?

If you disagree with any part of the settlement (including the lawyers' fees) but don't want to opt out, you may object. You must give reasons why you think the Court should not approve it and say whether your objection applies to just you, a part of the class, or the entire class. The Court will consider your views. The Court can only approve or deny the settlement — it cannot change the terms of the settlement. You may, but don't need to, hire your own lawyer to help you.

To object, you must send a letter to the Court (or file your comment on the docket in this Action) that:

(1) is received by [date];
(2) includes the case name and number (*Patz v. City of San Diego*, No. 37-2015-00023413)
(3) includes your full name, address where you receive single-family residential water service (or received that water service) from the City of San Diego, the name of the property owner for the address where the objector/commenter receives or received water service from the City of San Diego (if you are not the property owner), your telephone number, and your email address (if you have one);
(4) states the reasons for your objection;
(5) the name and contact information of any attorneys representing,

advising, or assisting you in filing your comment or objection, and if you are advised or represented by an attorney, a statement identifying the objections that attorney has filed to other class action settlements in the last five years;

(6) says whether either you or your lawyer intend to appear at the final approval hearing and your lawyer's name;

(7) your signature (handwritten or electronically imaged, e.g., "DocuSign").

Mail the letter to:

PO Box 19504, Irvine, CA 92623 Toll-Free: 1-888-903-0334 Email:	San Diego Superior Court, Hall of Justice, Fourth Floor, 330 W Broadway, San Diego, CA 92101

Doing Nothing

What are the consequences of doing nothing?

If you do nothing, you will still be bound by the settlement and its "release" provisions. That means you won't be able to start, continue, or be part of any other lawsuit against the City of San Diego about the issues in this case. A full description of the claims and persons who will be released if this settlement is approved can be found [website].

Key Resources

How do I get more information?

This notice is a summary of the proposed settlement. The complete settlement with all its terms can be found at [website]. To get a copy of the settlement agreement or get answers to your questions:

- contact your lawyer (information below)
- visit the case website at [website]
- access the Court's Public Portal online or by visiting the Clerk's office of the Court (address below). While you may access the

complete settlement and the other documents from this case from the Court (either on its online portal or at the Clerk's office in person), please **do not** reach out to the Court with questions about the settlement. If you have questions about the settlement, contact the Settlement Administrator, visit the case website, or contact your attorneys (information listed in the table below).

Resource	Contact Information
Case website	[website]
Settlement Administrator	PO Box 19504, Irvine, CA 92623 Toll-Free: 1-888-903-0334 Email:
Your Lawyers	Andre M. Mura Steven M. Tindall Ezekiel S. Wald Gibbs Mura LLP 1111 Broadway, Suite 2100 Oakland, CA 94067 Daniel L. Rottinghaus Howard J. Silldorf Anne L. Rauch Theresa M. Filicia Berding & Weil, LLP 160 Hotel Circle North, Ste. 701 San Diego, CA 92108
Court (DO NOT CONTACT WITH QUESTIONS)	San Diego Superior Court, Hall of Justice, Fourth Floor, 330 W Broadway, San Diego, CA 92101

Instructions for accessing eCourt Public Portal

To access the Court's eCourt Public Portal online found at https://odyroa.sdcourt.ca.gov/Cases#, you will first need to "agree" to the terms and conditions shown on the screen. You can then access

> case documents by entering the case number, 37-2015-00023413, in the “V3 Format,” and clicking on "Search." On the following page, you will see case details, information about future hearings, and if you scroll down, the Court’s “Register of Actions.” You may then download images of every document filed in the case for a fee. You may also view images of case documents for free at one of the computer terminal kiosks at court locations.

EMAIL NOTICE

If you were a single-family residential water customer of the City of San Diego between August 14, 2014 and December 1, 2023, the settlement of the Class Action Lawsuit *Patz v. City of San Diego*, 37-2015-00023413-CU-MC-CTL may affect your rights.

For complete information, visit [website] or call 1-888-903-0334.

You are not being sued. This is not a solicitation from a lawyer. This Email Notice was authorized by the Superior Court of California, County of San Diego.

You received this email notice because you may be a member of the group of people affected, called the "class." This notice tells you how to get more information.

If you were a single-family residential water customer of the City of San Diego any time between August 14, 2014 and December 1, 2023, you may be entitled to payment as part of the settlement of this lawsuit.

What is the lawsuit about?

A Settlement has been reached in a class action lawsuit against the City of San Diego. The lawsuit concerns whether the City of San Diego's single-family residential water rates between August 14, 2014 and December 1, 2023 were unconstitutional. San Diego in the lawsuit denies it did anything wrong. The Settlement is a compromise to end the lawsuit – it does not determine who is right. The lawsuit is called *Patz v. City of San Diego*, 37-2015-00023413-CU-MC-CTL, and is pending in the San Diego Superior Court.

Your options:

Option 1: Take no further action to get payment from the settlement. To receive payment, the settlement administrator may need to verify your contact information, and you will be asked to choose your preferred payment option.

Option 2: Submit an Opt-Out form to get no payment but keep the right to sue the City of San Diego about the same issues.

Option 3: Object. Tell the court why you don't like the settlement.

For complete information, visit [website] or call 1-888-903-0334.

POSTCARD NOTICE

San Diego Superior Court
Patz v. City of San Diego
Case No. 37-2015-00023413-CU-MC-CTL

Class Action Notice

Authorized by the Superior Court

Example QR Code. Replace this with case specific QR Code.

Were you a single-family residential water customer of the City of San Diego any time between August 14, 2014 and December 1, 2023?

There is a $40,000,000 settlement of a lawsuit.

You may be entitled to money.

You can visit [website] to learn more.

Key things to know:

- This is an important legal document.
- If you take no action, any ruling from the court will apply to you, and you will not be able to sue the City of San Diego about the same issues.
- If you have questions or need assistance, please call 1-888-903-0334
- You can learn more at [website] or by scanning the QR code.

Court-Approved Legal Notice



This is an important notice about a class action lawsuit.

<<MAIL ID>>

<<NAME 1>>
<<NAME 2>>
<<ADDRESS LINE 1>>
<<ADDRESS LINE 2>>
<<ADDRESS LINE 3>>
<<ADDRESS LINE 4>>
<<ADDRESS LINE 5>>
<<CITY, STATE ZIP>>
<<COUNTRY>>

PUBLICATION NOTICE

San Diego Superior Court
Patz v. City of San Diego
Case No. 37-2015-00023413-CU-MC-CTL

Class Action Notice

Authorized by the Superior Court

Example QR Code. Replace this with case specific QR Code.

What is this notice?

This notice is to tell you about the settlement of a class action lawsuit, *Patz v. City of San Diego*, brought on behalf of people who were single-family residential water customers of the City of San Diego at any time between August 14, 2014 and December 1, 2023. If you were a single-family residential customer during this time period, **you are a member of the group of people affected**, called the "class", and **you may be entitled to money as part of the settlement**. This notice tells you how to get more information about the settlement.

Were you a single-family residential water customer of the City of San Diego any time between: August 14, 2014 and December 1, 2023?

Your options:	More about each option:
Do Nothing (but be prepared to confirm your contact information and select your preferred payment method)	The Court of Appeal affirmed a refund calculation in the appeal of this case. If you were overcharged based on that calculation, you do **not** need to submit anything further at this time to receive a partial refund. The settlement administrator may ask you to confirm your contact information and select your preferred method of payment. **Not all customers were overcharged. You will only receive a refund if you were overcharged based on the refund calculation accepted by the Court of Appeal.** The amount of the refund will be based on each customer's share of the net settlement fund. If you do nothing further, you will also give up rights resolved by settlement.
Opt Out	Get no payment. Allows you to bring another lawsuit against the City of San Diego about the same issues.
Object	Tell the Court why you don't like the settlement.

You can learn more at: [website], or scan the QR code.

Key things to know:

- This is an important legal document.
- If you take no action, you will still be bound by the settlement, and your rights will be affected.
- If you have questions or need assistance, please call 1-888-903-0334.

OPT-OUT FORM

Class Action Opt-Out Form

Patz v. City of San Diego, No. 37-2015-00023413

This form excludes you from the class action.

This is not a claim form. **If you complete this form, you will be choosing not to participate in the class action.** However, you will keep your right to pursue your own litigation with your own lawyer at your expense.

To opt out of this class action, do one of the following: complete the form below and submit it to the notice administrator via U.S. mail OR email. These instructions are also available on the settlement website, [website].

This form must be postmarked no later than _____ if sent via U.S. mail.

If you submit the form via email, it must be received by the administrator no later than _____.

To opt out, fill out form below and mail OR email to address provided.

I have received notice of the class action, *Patz v. City of San Diego.* I wish to be excluded from the Class and not to be bound by any determinations or judgments in the litigation, whether favorable or unfavorable to the Class.

Date _____ Signature _____

Typed or Printed Name_____

Street Address_____

City, State, Zip Code_____

Telephone number, including area code [OPTIONAL]_____

To opt out: complete form and mail or email to the notice administrator listed to the right.

PO Box 19504, Irvine, CA 92623
Toll-Free: 1-888-903-0334
Email: