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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ROHINI KUMAR, an individual, on behalf
of herself, the general public and those
similarly situated,

Plaintiff,

v.

SALOV NORTH AMERICA CORP.,

Defendant.

CASE NO. 4:14-cv-02411-YGR

**SUPPLEMENTAL DECLARATION OF
JEANNE C. FINEGAN, APR**

Date: May 30, 2017

Time: 2:00 p.m.

Courtroom 1, Fourth Floor

Hon. Judge Yvonne Gonzalez Rogers

I, JEANNE C. FINEGAN declare as follows:

INTRODUCTION

1. I am President and Chief Media Officer of HF Media, LLC, a division of Heffler Claims Group which specializes in the design and implementation of court approved legal notice plans. This Declaration is based upon my personal knowledge as well as information provided to me by my associates and staff, including information reasonably relied upon in the fields of advertising media and communications.

1 2. I submit this Declaration in order to provide the Court and the parties to the action a
2 supplemental report regarding claim submission and distribution, as promised in my declaration of
3 May 16, 2017.

4 **UPDATE ON CLAIM SUBMISSION**

5 3. As of May 25, 2017, Heffler has received 65,048 claims. Of the total claims,
6 64,600 were submitted online and 448 were submitted by mail.

7 4. Upon review of the claims, 53,030 have been deemed valid claims. The total value
8 of the distribution is \$210,985.00, representing 406,947 bottles. The approved claims break down
9 as follows:

- 10 • There were 12,032 claims for 1-4 bottles. Each received \$2.00, for a total of
11 \$24,064.00.
- 12 • There were 11,085 claims for 5-9 bottles (receiving between \$2.00 and \$5.00).
13 These claims totaled \$36,225.50.
- 14 • There were 29,880 claims for 10 bottles. Each will receive \$5.00, totaling
15 \$149,400.00.
- 16 • There were 33 claims with proof of purchase documentation for more than 10
17 products. These claims totaled \$1,295.50.

18 5. The 12,018 claims that were denied were all claims in which we already had
19 approved a claim (or a combined set of claims) from the same household for ten bottles (\$5.00),
20 and no proof of purchase was submitted in conjunction with the claims. If a household filed one
21 claim for eight bottles and another claim for six bottles without proof of purchase, these claims
22 would both be treated as “approved” claims, with the total number of approved bottles being 10,
23 and the payment being \$5.00; neither claim was treated or counted as denied. The 12,018 claims
24 that were denied, therefore, were all from households for which we already had approved one or
25 more claims for a combined ten bottles.

26 I declare under the penalty of perjury under the laws of the United States of America that
27 the foregoing is true and correct. Executed on May 26, 2017, in Tigard, Oregon.
28



Jeanne C. Finegan, APR