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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
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14 DIMITRI DIXON and RYAN SELTZ,
15 individually, and on behalf of all others similarly
situated,

16 Plaintiffs,

17 v.
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19 CUSHMAN & WAKEFIELD WESTERN,
INC., CUSHMAN & WAKEFIELD, INC., and
20 CUSHMAN & WAKEFIELD, OF
WASHINGTON DC, INC., and DOES 1-50,
21 inclusive,

22 Defendants.
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Case No. 3:18-cv-05813-JSC

**DECLARATION OF JACKIE HITOMI
ON BEHALF OF CPT GROUP, INC.,
SETTLEMENT ADMINISTRATOR**

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18 *and Collective Members, and Aggrieved Employees*
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DECLARATION OF JACKIE HITOMI

I, Jackie Hitomi, hereby declare:

1. I am employed as the Director of Settlement & Treasury Services by CPT Group, Inc. (“CPT”), the Court-appointed settlement administrator. I am authorized to make this declaration on behalf of CPT. As the case manager for this settlement, I have personal knowledge of the information provided herein, and if called as a witness, I could and would accurately testify thereto.

2. CPT was engaged by the parties to provide settlement administration services. CPT has been, and if the Court grants final approval of the Settlement, will be responsible for: (a) emailing, printing and mailing the Notice and Claim Form (“Notice Packet”) to all Settlement Class Members Opt-in Plaintiffs, and Non-California Opt-in Eligible Plaintiffs, as well as reminder mailings; (b) establishing and maintaining a static website containing case documents; (c) collecting and processing responses, including claim forms for Non-California Opt-in Eligible Plaintiffs; (d) calculating and distributing the Individual Settlement Payments; (e) tax reporting; (f) providing necessary reports and declarations; and (g) performing such other tasks as set forth in the Settlement Agreement or as the Parties mutually agree or that the Court orders.

3. On August 31, 2021, CPT received from Class Counsel the Notice Packet prepared by the Parties and approved by the Court. On September 3, 2021, counsel for Defendants provided CPT with a complete mailing list (“Class List”) which included each Settlement Class Member’s full name, most recent mailing addresses, Social Security Number, and other relevant information needed to calculate settlement payments.

4. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service. On September 20, 2021, Notice Packets were mailed to the 475 Class Members identified in the Class List by First Class mail. Additionally, 206 emails were sent where email addresses were available, all emails were delivered except for 3.

5. As of this date, 15 Notice Packets have been returned by the post office. For those without forwarding addresses, CPT performed skip traces to locate new mailing addresses. A total of 11 Notice Packets were re-mailed because a better mailing address was found. As of today’s date, 4 Notice

1 Packets are currently unable to be delivered because a better mailing address has not yet been found. Of
2 these 4 undelivered, 3 were successfully emailed, the 4th was not emailed as no email address is
3 available.

4 6. CPT has not received any Requests for Exclusion as of this date.

5 7. CPT has not received any objections to the settlement as of this date.

6 8. As of the date of this declaration, CPT has received 30 claims from Non-California Opt-
7 in Eligible Plaintiffs. The website will remain active providing case information at
8 www.cptgroupcaseinfo.com/cushmanandwakefieldsettlement.

9 9. As pursuant to the terms of the Settlement Agreement, a reminder mailing and emailing
10 was completed on October 21, 2021, to the 337 Non-California Opt-In Eligible Plaintiffs who had not
11 responded as of October 21, 2021.

12 10. CPT was also asked by the parties to complete the CAFA noticing. Therefore on
13 September 17, 2021 a CAFA Notice was sent to the CAFA Coordinator at the Office of the CA Attorney
14 General in San Francisco, CA accordingly.

15 11. CPT's estimated costs in connection with the administration of this Settlement, given the
16 number of Settlement Class and Collective Members and methods of notice, is \$20,000.00.

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18 I declare under penalty of perjury under the laws of the State of California that the foregoing is
19 true and correct. Executed this 25th day of October, 2021, at Irvine, California.

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23 Jackie Hitomi