

AUG 01 2018

Sherri R. Carter, Executive Officer/Clerk of Court

By: Brittny Smith, Deputy

11 **IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**

13 **REBECCA LEHMAN & HEATHER**
14 **WOMICK, individually and on behalf of all**
15 **others similarly situated;**

16 **Plaintiffs,**

17 **v.**

18 **HEALTH NET OF CALIFORNIA, INC.; and**
19 **HEALTH NET LIFE INSURANCE**
20 **COMPANY and DOES 1 through 100**
21 **inclusive,**

22 **Defendants.**

Case No.: BC567361

CLASS ACTION

SUPPLEMENTAL DECLARATION OF
JACQUELINE BRASEFIELD OF
GARDEN CITY GROUP, LLC
REGARDING SETTLEMENT
ADMINISTRATION

Judge: Hon. Kenneth R Freeman
Dept.: 14

1 I, JACQUELINE BRASEFIELD, declare and state as follows:

2 1. I am a Director of Operations for Garden City Group, LLC (“GCG”), a full service
3 administration firm providing legal administration services, including the development of
4 complex legal notice programs. Per Section (III)(E)(1) of the Settlement Agreement¹, GCG was
5 appointed as the Claims Administrator to issue the Notice and administer all other aspects of this
6 Settlement. I submit this declaration at the request of Class Counsel and to update the Court and
7 the Parties regarding administration. The following statements are based on my personal
8 knowledge as well as information provided by other experienced GCG employees working under
9 my supervision and, if called on to do so, I could and would testify competently thereto.
10

11 **DIRECT NOTICE**

12 2. As set forth in paragraphs 5 and 6 of the June 5, 2018 Declaration of Jacqueline
13 Brasefield regarding Settlement Administration (“June Declaration”), GCG mailed a copy of the
14 Notice and a personalized Claim Form (“Notice Packet”) to 12,860 Settlement Class Members
15 on May 8, 2018. June 25, 2018 was the deadline for Settlement Class Member to submit claim
16 forms, exclusion requests, and objections to the Settlement.
17

18 3. As of July 30, 2018, 36 Notice Packets have been returned as undeliverable with a
19 Change of Address from the United States Postal Service. As a result, the corresponding records
20 were immediately updated and Notice Packets were re-mailed. 739 Notice Packets have been
21 returned as undeliverable without forwarding address information. In accordance with Section
22 (III)(D) of the Settlement Agreement, GCG performed 665 advanced address searches for the
23 Notice Packets that were returned undeliverable without forwarding address information. GCG
24

25 _____
26 ¹ All capitalized terms not otherwise defined in this document shall have the meaning ascribed to them in the Class
27 Settlement Agreement and Release (“Settlement Agreement”) dated March 20, 2018.

1 subsequently re-mailed Notice Packets to 459 Settlement Class Members for whom updated
2 addresses were discovered.

3 **SETTLEMENT WEBSITE**

4 4. As discussed in paragraphs 7 and 8 of the June Declaration, on May 8, 2018, GCG
5 established a website for the Settlement, www.NetworkSettlement.com, to provide information
6 and important deadlines to Settlement Class Members and answer frequently asked questions.
7 GCG will continue to maintain and update the Settlement Website throughout the administration
8 of the Settlement. As of July 30, 2018, there have been 714 visitors to
9 www.NetworkSettlement.com.
10

11 **TOLL-FREE TELEPHONE HOTLINE**

12 5. As discussed in paragraphs 9 and 10 of the June Declaration, on May 8, 2018, GCG
13 established a toll-free telephone line (1-888-264-1304) with an Interactive Voice Response
14 System (“IVR”) that Settlement Class Members are able to call for general information about the
15 Settlement, to request a mailed copy of the Full Settlement Notice, or request a copy of their
16 Health Net Explanation of Benefits. GCG will continue to maintain and update the toll-free
17 telephone line throughout the administration of the Settlement. As of July 30, 2018, there have
18 been 204 calls made to the IVR.
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21 **EXCLUSIONS**

22 6. Pursuant to Section 14(b)(a) of the Preliminary Approval Order, Settlement Class
23 Members who wished to exclude themselves from the Settlement were required to submit a
24 written request for exclusion by mail, postmarked by June 25, 2018, to the Claims Administrator.
25 As of July 30, 2018, GCG has received one request for exclusion from a Settlement Class
26 Member, Brandi Payton.
27

1 **OBJECTIONS**

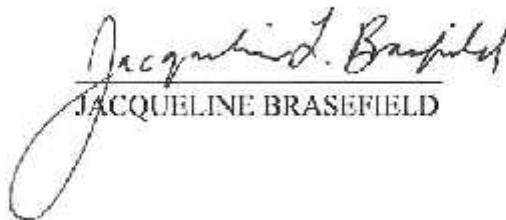
2 7. Pursuant to Section 14(b)(a) of the Preliminary Approval Order, Settlement Class
3 Members who did not exclude themselves can object to the Settlement. In order to contest the
4 approval of the Settlement Agreement, Settlement Class Members must have submitted their
5 written objection to the Claims Administrator, postmarked by June 25, 2018. As of July 30,
6 2018, GCG has not received any objections from Settlement Class Members.

7
8 **CLAIMS**

9 8. Pursuant to Section (III)(E) of the Settlement Agreement, Settlement Class Members may
10 file a Claim Form via U.S. Mail postmarked on or before June 25, 2018. As of July 30, 2018,
11 GCG has received 121 claims asserting \$452,350.29 of unpaid bills.² Six of these claims were
12 postmarked after the June 25, 2018 deadline.

13
14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct to the best of my knowledge.

16 Executed on July 31, 2018, in Seattle, Washington.

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19 
20 JACQUELINE BRASEFIELD
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26 ² As GCG is still receiving, reviewing, and processing claims, the information provided herein is preliminary
27 and subject to further analysis, verification, and quality control and is intended only for informational purposes at
this time.