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Superior Court of California
County of Fresno
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16 **IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
17 **IN AND FOR THE COUNTY OF FRESNO**

18 MANMOHAN DHILLON, dba RANCHOS
19 VALERO, SATNAM PABLA, dba GMG
20 FOOD STORE 101 and MADERA AVE.
21 MARKET, SERGE HAITAYAN, dba 7-11
22 NUMBER 17906b, DALJIT SINGH, dba
23 LIQUOR MAX, and PAR VENTURES, LLC,
24 dba, QUICK PICK, on Their Own Behalves
25 and on Behalf of All Others Similarly Situated
26 and on Behalf of the General Public,

27 Plaintiffs,

28 v.

ANHEUSER-BUSCH, LLC, DONAGHY
SALES, LLC, a California Corporation;
ANHEUSER-BUSCH DOES 1-5 and DOES
6 through 50, inclusive,

Defendants.

CASE NO. 14CECG03039 JMS

**DECLARATION OF PETER CRUDO IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

JUDGE: Honorable Jon M. Skiles

DATE: January 17, 2024

TIME: 3:30PM

DEPT: 403

1 I, PETER CRUDO, declare as follows:

2 1. I am the Executive Vice President of Class Action Services at Gilardi & Co., LLC,
3 (“Gilardi & Co.”). Gilardi & Co. was selected by Plaintiffs to act as the Settlement Administrator
4 in this matter and complete the Court-approved notice plan and claims process for the settlement
5 reached between the parties. I have personal knowledge of the matters set forth in this Declaration,
6 and if called as a witness, could and would testify competently thereto.

7 2. In consultation with Plaintiffs’ counsel, I have assisted with preparing a proposed
8 notice plan and claims administration process to distribute the Settlement Proceeds from the
9 proposed settlement to Class members. This Declaration will describe the proposed notice plan
10 and how it will provide the best notice practicable to the potential members of the Settlement Class.
11 This Declaration is based upon my personal knowledge and upon information provided to me by
12 Plaintiffs’ counsel, my associates, and Gilardi & Co. staff members.

13 3. I have implemented and coordinated some of the largest and most complex class
14 action notice and administration plans in the country. The scope of my work includes notification,
15 claims processing, and distribution plans in all types of class actions, including but not limited to
16 consumer, antitrust, securities, and government agency settlements.

17 4. Gilardi & Co. has also been appointed as notice, claims, and/or settlement
18 administrator in thousands of high-volume consumer, antitrust, and securities class action cases.
19 A profile of Gilardi & Co.’s background and capabilities, including representative case and client
20 lists, is included as **Exhibit 1** to this declaration.

21 **I. NOTICE PLAN**

22 5. The objective of the proposed notice plan is to provide the best practicable notice
23 under the circumstances to potential members of the Settlement Class. The Settlement Class is
24 defined as follows:

25
26 All persons who owned retail business establishments in Fresno and
27 Madera Counties classified in the Donaghy sales database within one of
28 the following channel descriptions and channel id numbers (“Cid#”): a)
Convenience/Cid# 190; b) Oil and Service/Cid# 195; c) Grocery/Cid#
265; d) Gas and Convenience/Cid# 294; e) Package Liquor/Cid# 200; f)

1 Mom and Pop/Cid# 175; g) Deli/Cid# 180; h) Bodega/Cid# 185; and i)
2 Package Liquor/Cid# 290, and which purchased from Donaghy beer
3 manufactured and/or sold by Anheuser-Busch during the period from
4 October 10, 2010 through December 31, 2014 excluding Vikram and
5 Vinay Vohra and Hardeep Singh and all entities owned, controlled by or
6 affiliated with any of them.

7 6. The proposed notice plan includes direct mailing of a “short form” summary
8 postcard notice to approximately 800 potential class members identified in what I am informed is
9 distributor, Donaghy Sales’, customer database of the Fresno and Madera counties retailers of
10 Anheuser Busch beer to whom Donaghy sold during the class period. A copy of that short form
11 direct mail notice is attached as **Exhibit 2**. Among other things, the short form mailed notice
12 provides information about the lawsuit, the proposed settlement, and class members’ rights with
13 respect to the litigation and the proposed settlement including to object, opt out and to claim a
14 share of the settlement proceeds. The short form notice also references a dedicated settlement
15 website (www.FresnoBeerLitigation.com) which Gilardi & Co. will set up and maintain which
16 will provide further information about the case. This includes the more detailed Long Form notice,
17 documents relevant to the case such as the Settlement Agreement and the Complaint.

18 7. For any Direct Mail Notices returned as undeliverable, the Settlement
19 Administrator will: (a) re-mail any notices returned by the United States Postal Service with a
20 forwarding address no later than the deadline set in the Preliminary Approval Order; (b) by itself
21 or using an address research firm, as soon as practicable following receipt of any returned notices
22 that do not include a forwarding address, research such returned mail for a better address and
23 promptly mail copies of the applicable notice to any better address so found.

24 8. In addition to the settlement website address, the short form notice also contains a
25 toll-free number and email address for the Administrator to which requests for further information,
26 including a copy of the Long Form Notice, may be directed. A copy of the Long Form Notice is
27 attached to this Declaration as **Exhibit 3**.

28 9. In addition to direct mailing of the short form notice, notice of the litigation and the
proposed settlement will be published in the Fresno Bee, with a state-wide press release also. A
copy of the publication notice is attached to this Declaration as **Exhibit 4**.

1 **II. CLASS MEMBER INQUIRIES AND CLAIMS**

2 10. To assist potential members of the Settlement Class with inquiries, Gilardi & Co.
3 will interface with class members through the dedicated website, email, and the toll-free line.

4 11. The case-specific website will also serve as the primary vehicle for the submission
5 of claims. Identified class members will be provided a claim id number and code to access the
6 class member's purchase information and permit that class member to submit its claim on-line.
7 Class members will also have the option to request a claim form and submit their claim by mail.
8 A copy of the claim form is attached to this Declaration as **Exhibit 5**. The website will contain and
9 be updated to include the relevant information and documents related to the claims process.

10 **III. CONCLUSION**

11 12. It is my opinion, based on my individual expertise and experience, and that of my
12 Gilardi & Co. colleagues, that the proposed notice plan is designed to effectively reach potential
13 members of the Settlement Class, will deliver plain language notices that will capture the attention
14 of the reader, and will provide relevant information in an informative and easy to understand
15 manner that is necessary to effectively understand the rights and options related to the claims
16 process and motion for preliminary approval of settlement and the other related applications. This
17 proposed notice plan conforms to the standards employed by Gilardi & Co. in notification plans
18 designed to reach potential class members of settlement groups or classes that are national in scope
19 and reach narrowly defined entities and demographic targets. For all these reasons, in my opinion,
20 the proposed notice plan satisfies due process.

21 13. I declare under penalty of perjury that the foregoing is true and correct. Executed
22 this 14th day of November 2023 at San Rafael, California.

23
24
25 

26 PETER CRUDO
27
28

EXHIBIT 1



For more than thirty years, Gilardi has been the nation's leading expert in legal settlements and claims administration. Established by Dennis and Susan Gilardi in 1984, we are solely dedicated to settlement administration and ensuring that the principles of due process and the needs of our clients and claimants are served. During our history, we have **administered thousands of matters, processed millions of claims and distributed billions of dollars. Our work has involved both simple matters and some of the largest and most complex settlements in history.** In all instances, we have had only one goal in mind – to earn your trust and become your primary partner.

We offer a full suite of services. We also offer a better way.

As experts in all phases of legal administration, we pride ourselves on our unmatched transparency, accountability and expertise. Our services include:

- **Pre-Settlement Consultation**
- **Legal Notification**
- **Class Member & Counsel Support**
- **Website Development**
- **Claims Processing**
- **Data Analysis & Validation**
- **Call Center**
- **Disbursement**
- **Tax Analysis & Reporting**

Our methods are tested and our track record is proven.

Through our history, we have served nearly all of the prominent firms in the United States and Canada, and have overseen settlements ranging **from less than 1 million dollars to more than 7 billion dollars.** We have also partnered with and performed administration services for numerous government entities, including:

- The U.S. Department Of Justice
- The Federal Trade Commission
- The U.S. Securities and Exchange Commission
- The U.S. Commodity Futures Trading Commission
- The Attorneys' General of every state and various local and county entities



The Gilardi Difference

We understand the case. Our management reflects an experienced, interdisciplinary team of professionals and our operational managers have an average tenure of more than a decade's worth of claims administration specific experience.

We sweat the details. Our processes rely on exhaustive and precise planning, a goal-driven plan and measured and transparent results. We do much of our best work well before the claims process begins.

We are Independent. Our market demands that we have no conflicts of interest that could compromise our services or undermine the basic ethical principles of the legal system. Because of our closely held nature and our commitment to ethical principles and corporate governance, Gilardi has never had a conflict of interest, however remote, in any matter.

We are Leaders in Technology. Our commitment to technological solutions and ongoing investment in technology accelerates the cost efficiency and accuracy of our work, allowing us to exert tight operational controls, while processing work onsite at our central facility.

We never outsource. Ever. Our work is direct and confined. We exercise local control in all matters and do not offshore any portion of our administration work.

We are here to serve. At the end of the day, we understand that each and every settlement is personal: personal to the lawyers who have litigated the matter, personal to the claimants who participate in the claims process and personal to the court responsible for oversight. We are committed to ensuring that our service also remains a personal one.

Indeed, our commitment to our people, our market, and our investment in technology driven solutions was recognized when readers of the legal newspaper *The Recorder* voted us as the **Best Claims Administrator** in 2012, 2013 and 2014.

Please find specific examples of our work below:



Antitrust

Law, Hall, Schreiber, et al. v. The National Collegiate Athletic Association (Nos. 94-cv-02053, 94-cv-02392, and 95-cv-02026) (D. Kan.) (\$54.5 million settlement)

Compensation limits for certain Division I coaches.

In re Rubber Chemicals Antitrust Litigation (Settlement funds totaling \$319.5 million)

In re Copper Products Antitrust Cases (\$83.5 million combined settlement)

In re Polychloroprene Rubber Antitrust Litigation (Settlement funds totaling \$55.35 million)

In re Static Random Access Memory (SRAM) Antitrust Litigation (\$39.5 million indirect purchaser settlement; \$41 million direct purchaser settlement)

In re New Motor Vehicles Canadian Export Antitrust Litigation (\$35 million settlement)

Full administration services included online claims filing with VIN verification as well as tracking both consumer and fleet claims in multiple states.

In re Ethylene Propylene Diene Monomer (EPDM) Antitrust Litigation (\$105.8 million in settlements with multiple defendants)

In re Synthroid Marketing Litigation (\$98 million settlement)

In re McKesson Governmental Entities Average Wholesale Price Litigation (\$82 million settlement)

In re Cathode Ray Tube (CRT) Antitrust Litigation (Direct Purchaser class) (\$93 million in settlements between the Direct Purchaser Plaintiffs and Defendants CPT (\$10 million), Philips (\$27 million), Panasonic (\$17.5 million), LG (\$25 million), and Toshiba (\$13.5 million); litigation continues as to remaining Defendants)

Pecover v. Electronic Arts, Inc. (\$27 million settlement)

Exclusive licensing agreements that allegedly raised the price on certain Electronic Arts video games.

In re Titanium Dioxide Antitrust Litigation (Direct Purchaser class) (\$163.5 million in settlements between the Direct Purchaser Plaintiffs and Defendants DuPont (\$72 million), Huntsman (\$6.5 million), Cristal (\$50 million), and Kronos (\$35 million))

In re Optical Disk Drive Products Antitrust Litigation (Direct Purchaser class) (\$26 million in settlements thus far; litigation continues as to remaining Defendants)

In re Hydrogen Peroxide Antitrust Litigation (Indirect Purchaser class) (\$4.2 million in settlements between the Indirect Purchaser Plaintiffs and Defendants Solvay (\$2.1 million), Degussa (\$950,000), Akzo (\$675,000), FMC (\$250,000), Kemira (\$225,000), and Arkema)

Stetson v. West Publishing Corp. (\$9.5 million settlement)

Abid v. Grosvenor Bus Lines (\$3.1 million settlement)

In re New Jersey Tax Sales Certificates Antitrust Litigation (\$1.65 million settlement)



Consumer Protection and Product Liability

In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation (\$1.6 billion settlement) More than 22 million notices mailed.

In re Mattel, Inc., Toy Lead Paint Products Liability Litigation

Gilardi received, tracked, and stored returned product and distributed appropriate refunds pursuant to a complex settlement benefits matrix.

Pappas v. Naked Juice Co. (\$9 million settlement)

Over 700,000 claims generated without direct notice to the class

Lavender v. Skilled Healthcare Group, Inc. (\$50 million settlement)

Utility Consumers' Action Network and Eric Taylor v. Sprint Solutions, Inc. (\$2.2 million settlement)

In re Bank of America Credit Protection Marketing and Sales Practices Litigation (\$20 million settlement)

In re Aurora Dairy Corp. Organic Milk Marketing and Sales Practices Litigation (\$7.5 million settlement)

"American Idol"/"Deal or No Deal" Litigation – *Couch v. Telescope Inc./Herbert v. Endemol USA, Inc.* (\$51 million combined settlement)

Stephens v. American Equity Investment Life Insurance Company (\$36 million settlement)

In re Bayer Corp. Combination Aspirin Products Marketing and Sales Practices Litigation (\$15 million settlement)

McCardle v. 24 Hour Fitness USA, Inc.

Claimants were given access to all 24 Hour clubs regardless of current club access level.

Clark v. AdvanceMe, Inc. (\$11.5 million settlement)

CLRB Hanson Industries, LLC v. Google, Inc. (\$20 million settlement)

White v. Cellco Partnership d/b/a/a Verizon Wireless (\$21 million settlement)

Egleston v. Verizon New York Inc. et al. (\$4.5 million settlement)

Arce v. Kaiser Foundation Health Plan, Inc. (\$9.29 million settlement)

Budgin v. American Honda Motor Company, Inc.

Honda reimbursed claimants for cost of replacing defective windshields.

Daniel v. American Honda Motor Company, Inc.

Honda reimbursed claimants for cost of replacing defective windshields.

Bacca v. BMW of North America

BMW reimbursed claimants for cost of sub-frame inspection and repair.

Skuro v. BMW of North America/ATX

Non-Reversionary Fund of \$300,000 for Claimants who declined or did not have option of Service Benefit.

Shin v. BMW of North America

BMW replaced defective wheels or reimbursed Claimants for cost of replacement.



Chandran v. BMW of North America

BMW replaced defective tires at a discount rate and reimbursed Claimants for past replacements.

Abat v. Chase Bank USA (\$4.9 million settlement)

Bernstein v. Chase Bank USA (\$5 million settlement)

Arendas v. Citibank (\$7.9 million settlement)

Bayat et. al v. Bank of the West (\$3.4 million settlement)

Telephone Consumer Protection Act ("TCPA") Settlement for an estimated 870,000 class members.

Connor et al. v. JPMorgan Chase Bank, et al (\$9 million settlement)

TCPA Settlement via Online and Phone Claims Filing for 2.4 million class members.

Adams v. AllianceOne, Inc. (\$6 million settlement)

TCPA Settlement via Online and Phone Claims Filing for 5.6 million class members

Grannan v. Alliant Law Group, P.C. (\$1 million settlement)

TCPA Settlement via Online and Phone Claims Filing for 242,000 class members.

Ballard Nursing Center, Inc. v. Kinray Inc. (\$1.5 million settlement)

TCPA Settlement via Fax Blast Notice to 10,600 class members.

McCarthy v. CB Richard Ellis, Inc. (\$300,000 settlement)

TCPA Settlement via Fax Blast Notice to 10,900 class members.

Scott et al. v. Service Corporation International et al. (\$35 million settlement)

This settlement, valued at more than \$80 million, involved the reimbursement of claimants who had purchased goods or services for an in-ground burial at Eden Memorial Park from 1985-2009.

U.S. Foodservice Pricing Litigation (\$297 million settlement)

Administration of two, separate settlements.

Barnes v. American Residential Services (\$7.5 million settlement)

American Residential Services, known as "Rescue Rooter," reimbursed up to 200,160 class members and provided the right to rescind the purchase of a HALO brand water treatment device.

Federal Trade Commission Consumer Redress

Gilardi has held a contract with the FTC for more than 25 years.

FTC v. Countrywide Home Loans, Inc. (\$108 million redress)

More than 600,000 checks mailed. Gilardi reconciled the data, calculated distribution amounts, and mailed the first check distribution within 7 weeks of receiving the initial data.

U.S. v. Select Portfolio Servicing, Inc. (formerly Fairbanks Capital Holding Corp.) (\$40 million redress)

FTC v. Associates First Capital Corp. (Citigroup) (\$240 million redress)

FTC v. Fairbanks (\$40 million redress)

FTC v. EMC Mortgage Co. and The Bear Stearns Companies (\$28 million redress)

FTC v. American Tax Relief (\$16 million redress)



FTC v. Ameridebt (\$14.8 million redress)

FTC v. Peoples Credit First (\$7 million redress)

FTC v. Business Cards Experts (\$6 million redress)

FTC v. Capital Choice Consumer Credit (\$3 million redress)

FTC v. Chinery (\$8 million redress)

Notice and Claim administration for purchasers of the dietary supplement "Xenadrine EFX."

Insurance

Ruiz v. California State Automobile Association Inter-Insurance Bureau (\$6.5 million settlement)

Distribution of Notice to almost 2 million potential class members who paid finance charges to Defendant when they paid their auto/homeowners insurance premiums in installments.

L.A. Airline, Inc. v. Republic Indemnity Company of California (\$1.85 million settlement)

Alleged artificially inflated workers' compensation premiums.

Patrick v. California Physicians' Service dba Blue Shield of California (\$20 million settlement)

Blue Shield of California subscribers alleged Defendants misrepresented how copayments and deductibles would be calculated.

Toyota Motor Credit Corporation Collateral Protection Insurance Litigation – Bassett v. Toyota Motor Credit Corporation/Ganal v. Toyota Motor Credit Corporation (Approx. \$18 million settlement)

Force-placed collateral protection insurance – motor vehicles.

Coates v. Fidelity Acceptance Corporation (\$11 million settlement)

Force-placed collateral protection insurance – motor vehicles.

Farber v. Idaho State Insurance Fund (\$2.95 million settlement)

Workers' compensation insurance dividend distribution improperly excluded holders of certain policies.

Labor and Employment

Saipan Garment Workers Litigation (\$20 million settlement)

Litigation comprised of cases *Does I v. The Gap, Inc.*, 01-cv-0031 (D. N. Mar. I.), *Does I v. Advance Textile Corp.*, 99-cv-0002 (D. N. Mar. I.), *UNITE v. The Gap, Inc.*, 300474 (Cal. Super. Ct., San Francisco County).

The settlement with several major U.S. clothing retailers, valued at \$20 million, includes a \$6.4 million in unpaid back wages for 30,000 former and current garment workers, a company code of conduct, independent monitoring, and a \$3,000 repatriation fund.

Mambuki v. Securitas Security Services USA, Inc. (\$15 million settlement)

Dahingo v. Royal Caribbean (\$18.4 million settlement)

Adams v. Blockbuster (\$12 million settlement)



Butler v. Home Depot, Inc. (\$65 million settlement)
Sex discrimination claims brought by female employees of Defendant's West Coast Division Stores.

"20 Year Pension" Class Settlement (\$160 million settlement)
Alleged miscalculation of retirement benefits for New York City teachers and Board of Education employees.

Washington Mutual Bank/J.P. Morgan Chase Bank Wage and Hour Cases (\$41 million settlement)
Alleged unpaid wages.

Vedachalam v. Tata Consultancy Services (\$29.75 million settlement)
This matter involved non-U.S. citizens deputed from India to the United States. Among other services, Gilardi provided a Hindi translation of the notice.

Waste Management Wage and Hour Cases (\$15 million settlement)

USA Petroleum Wage Cases (\$15 million settlement)

Martin v. FedEx Ground Package Systems, Inc. (\$8.1 million settlement)

Savala v. Nordstrom (\$12.5 million settlement)

Madison v. Cedar Fair (\$9 million settlement)

Rutti v. LoJack Corporation (\$8.1 million settlement)
Average settlement payment of \$21,000.

Cookson v. NUMMI (New United Motor Manufacturing, Inc.) and Toyota (\$6 million settlement)

Trauth v. Spearmint Rhino Companies Worldwide (\$12.97 million settlement)
Multi-state distribution.

Mowdy v. Beneto Bulk Transport (\$14 million settlement)

Castellanos v. The Pepsi Bottling Group (\$9 million settlement)

Bolanos v. Norwegian Cruise (\$25 million settlement)

Pedroza v. PacBell (\$4.5 million settlement)

Erickson v. Old Republic (\$12 million settlement)

Ingersoll v. Farmland Foods (\$4.25 million settlement)

Avery v. Integrated Healthcare Holdings, Inc. (\$14.5 million settlement)
Alleged overtime pay violations with respect to employees who worked 12-hour shift positions.

Securities and Exchange Commission Administrations

SEC v. Cardinal Health (\$35 million settlement)

SEC v. Charles Schwab (\$110 million settlement)

SEC v. Qwest Communications (\$252 million settlement)

SEC v. Sayre et al. (\$0.99 million settlement)



SEC v. Skowron (\$35 million settlement)
SEC v. Southwest Securities Fair Fund (\$10 million settlement)
SEC v. Xerox Corporation (\$44 million settlement)
SEC v. Gallucci (\$2.1 million settlement)
SEC v. Advanced Technologies Group (\$19 million settlement)
SEC v. Dynegy Fair Fund (\$20 million settlement)
SEC v. United Rentals, Inc. Fair Fund (\$25 million settlement)
SEC v. Raza Fair Fund (\$2.9 million settlement)
Alleged unlawful insider trading in the securities of Align Technology, Inc.
SEC v. Colburn (\$8 million settlement)
SEC v. Hawaiian Air (\$2.5 million settlement)

Securities Litigation

Enron Securities Litigation (\$7.2 billion settlement)
Gilardi facilitated 12 Notice mailings prior to the claims administration process. Researched and identified 66 known eligible securities and hundreds of “other security types” under the sophisticated Plan of Allocation. Eligible securities comprised of common stock, bonds, foreign debt, employee options, listed options, convertible preferred notes.

AOL Time Warner Securities Litigation (\$2.5 billion settlement)
Charles Schwab Corporation Securities Litigation (Federal Class and California Class) (\$235 million combined settlement for civil case)

Cardinal Health, Inc. Securities Litigation (\$600 million settlement)
Qwest Communications International Securities Litigation (\$445 million settlement)
Xerox Securities Litigation (\$750 million settlement)

UnitedHealth Group Securities Litigation (\$925.5 million settlement)
Settlement involved eighteen unique security types comprised of common stock, bonds, listed options, and employee options.

Deutsche Bank MBS Securities Litigation (\$32.5 million settlement)
Settlement involved two trusts (Deutsche Alt-A Securities Mortgage Loan Trust 2006-AR5 & Deutsche Alt-B Securities Mortgage Loan Trust 2006-AB4) with a total of 52 tranches and multiple CUSIPs.

Citigroup Mortgage Securities Litigation (\$25 million settlement)
Settlement involved two trusts (Citigroup Mortgage Loan Trust 2007-AR5 & Citigroup Mortgage Loan Trust 2007-WFHE2) with a total of 38 tranches and multiple CUSIPs.

In re Tronox, Inc. Securities Litigation (\$37 million settlement)

Thornburg MBS Litigation (\$11 million settlement)



Canadian Superior Securities Litigation (\$5.2 million settlement)
Administration was cross-border with multi-currency distribution in the United States and Canada.

Flowserve Securities Litigation (\$55 million settlement)

Accredo Health Securities Litigation (\$33 million settlement)

Sonus Networks Securities Litigation (\$40 million settlement)

Touch America/Montana Power Litigation (\$58.3 million settlement)

Integrated a Federal, State and ERISA action in one global Notice mailing, managed two separate plans of allocations within one claimant database and facilitated a joint distribution of monies.

Shuffle Master, Inc. Securities Litigation (\$13 million settlement)

U.S. Department of Justice Remission and Restitution

Gilardi currently holds a contract with the DOJ to provide redress and asset forfeiture administrative services. We were ranked #1 of all respondents to the DOJ's solicitation.

U.S. v. Kristine Eubanks (\$1.8 million remission)

In addition to processing the petitions for remission, Gilardi's duties included verifying the petition entries against actual items received and cataloging and maintaining inventory records of submissions.

U.S. v. Richard Alyn Waage (\$8.6 million remission)

Gilardi inherited aged claimant data and supporting documentation from the IRS and former contractor, normalized information and converted into electronic format to facilitate notice and distribution.

U.S. v. MoneyGram International (\$100 million remission)

U.S. v. Qwest Communications (\$44 million remission)

U.S. v. David A. Smith (approximately \$5.2 million remission)

U.S. v. ProNetLink (\$7.7 million remission)

The DOJ "piggybacked" the claimant database established in the corresponding civil matter, utilizing a slightly different distribution plan.



EXHIBIT 2

Notice of Class Action Settlement

Fresno Beer Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134

A Settlement has been proposed
in a class action lawsuit about
wholesale purchases of Anheuser-
Busch beer by retailers in Fresno
and Madera counties.



Postal Service: Please Do Not Mark Barcode

DNH-«Claim8»-«CkDig»

«FirstNAME» «LastNAME»

«Addr1» «Addr2»

«City», «State»«FProv» «Zip»«FZip»

«FCountry»

DNH



<<Barcode>>

<<ClaimID>>



THIS CARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT.
VISIT WWW.FRESNOBEERLITIGATION.COM OR CALL 1-888-352-1373 FOR MORE INFORMATION

A Settlement has been proposed in a class action lawsuit against Anheuser Busch, LLC (“A-B”) and Donaghy Sales, LLC (“Donaghy”) (collectively “Defendants”). The Settlement resolves overcharge claims brought by certain retailers in Fresno and Madera counties who purchased A-B beer from Donaghy between October 10, 2010, and December 31, 2014. Defendants deny all allegations of wrongdoing.

Who’s Included? All persons who owned retail business establishments in Fresno and Madera Counties classified in the Donaghy sales database within one of the following channel descriptions and channel ID numbers (“Cid#”): a) Convenience/Cid# 190; b) Oil and Service/Cid# 195; c) Grocery/Cid# 265; d) Gas and Convenience/Cid# 294; e) Package Liquor/Cid# 200; f) Mom and Pop/Cid# 175; g) Deli/Cid# 180; h) Bodega/Cid# 185; and i) Package Liquor/Cid# 290, and who purchased from Donaghy beer manufactured and/or sold by Anheuser-Busch during the period from October 10, 2010 through December 31, 2014 excluding Vikram and Vinay Vohra and Hardeep Singh and all entities owned, controlled by or affiliated with any of them. If this card was addressed to you and you received it in the mail, you are likely included in the Settlement as a “Settlement Class Member” because Donaghy’s sales records indicate that you purchased A-B beer from Donaghy during the Class Period.

What does the Settlement provide? Under the Settlement, Defendants will pay a total of \$2.5 million dollars to resolve all claims made by Settlement Class Members, notice and administration costs, service awards, and attorneys’ fees and costs. Class Members who submit a valid Claim Form will receive a pro-rata share of the funds remaining after payment of costs of administration and any attorneys’ fees and costs and service awards approved by the Court.

How do I get a Payment? You must complete and submit a Claim Form by XXXX. Claim Forms may be found and submitted online at www.FresnoBeerLitigation.com using your ClaimID and PIN or requested from the Settlement Administrator at 1-888-352-1373 and mailed to the address on the form.

What are my other options? If you do nothing, your rights with respect to the claims made in the case will be affected and you won’t get a payment. If you don’t want to be legally bound by the Settlement, you must exclude yourself from it by XXXX. Unless you exclude yourself, you won’t be able to sue Defendants for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the Settlement (i.e., don’t exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the hearing—at your own cost—but you don’t have to. Objections and requests to appear are due by XXXX. More information about these options is available at www.FresnoBeerLitigation.com.

The Court’s hearing. The Court will hold a Final Approval Hearing in this case (*Manmohan Dhillon, et al. v. Anheuser-Busch, LLC et al.*, Case No. 14CECG03039 JMS) on XXX, 2024. At the hearing, the Court will decide whether to approve the Settlement, Class Counsel’s request for attorneys’ fees (of 25% of \$2.5 million dollars), costs of approximately \$750 thousand dollars; and service awards of \$5 thousand dollars each to the five (5) Class Representatives (\$25 thousand dollars total). You or your lawyer may appear at the hearing at your own expense. Questions? Go to www.FresnoBeerLitigation.com or call 1-888-352-1373.

EXHIBIT 3

If You Were a Retailer in Fresno or Madera Counties and Purchased Anheuser-Busch Beer from Donaghy Sales LLC, a Settlement Has Been Reached that May Affect Your Rights

The Fresno Superior Court authorized this notice. This is not a solicitation from an attorney.

- A settlement has been reached in a class action lawsuit against Anheuser-Busch LLC, (“A-B”) and Donaghy Sales LLC (“Donaghy”) (“Defendants”), regarding alleged price discrimination in wholesale prices charged to certain Fresno and Madera County retailers by Donaghy for A-B beer.
- The settlement provides payments based on the volume of A-B beer which certain Fresno and Madera County retailers purchased from Donaghy during the period starting on October 10, 2010 and ending on December 31, 2014.

Please read this Notice carefully. Your legal rights are affected, whether you act or not.

If Your Mailing Address or Contact Information Has Recently Changed, It Is Important to Update It with The Settlement Administrator by Visiting www.FresnoBeerLitigation.com or Calling 1-888-352-1373 or Emailing info@FresnoBeerLitigation.com.

A. BASIC INFORMATION

A court authorized this notice to inform you about a proposed settlement of a class action lawsuit and about all your options and associated deadlines. The name of the lawsuit is *Manmohan Dhillon, et al. v. Anheuser-Busch, LLC et al.* CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno County).

This notice explains the lawsuit, the settlement, and your legal rights. You are NOT being sued. The Court still must decide whether to approve the settlement. If the settlement is approved, money will be available.

YOUR LEGAL RIGHTS AND OPTIONS		
SUBMIT A CLAIM FORM TO RECEIVE A SETTLEMENT AWARD	To receive a settlement award, You need only visit www.FresnoBeerLitigation.com and enter the information requested and electronically sign the online Claim Form. Or you may download a copy of the Claim Form and mail it to the Settlement Administrator at the address provided on the Claim Form. You must submit your claim by XXXX . In order to submit your Claim, you must give up your right to sue defendants concerning the legal claims in this lawsuit, and you will be bound by the result in this lawsuit.	No later than: XXXX
OBJECT	Write to the Court about why you do not like the proposed settlement.	No later than: XXXXX
EXCLUDE YOURSELF	Ask to opt out of the settlement. If you opt out, you are not entitled to any settlement benefits, but you keep your right to sue A-B and Donaghy in your own personal lawsuit. If you do not opt out of the settlement, you will be bound by the result of this lawsuit. If you opt out of the settlement, you cannot object to the settlement.	No later than: XXXX

The lawsuit contends that between October 10, 2010, and December 31, 2014, A-B and Donaghy allegedly violated beer pricing and other laws by allegedly discriminating in the wholesale prices Donaghy charged to beer retailers in Fresno and Madera counties through the distribution of consumer coupons to retailers. A-B and Donaghy deny all wrongdoing and liability. The parties agreed to resolve the case before these issues were decided by the Court.

On **XXXXX**, the Court issued an order certifying this case as a class action for Settlement Purposes, defining the Class as follows:

All persons who owned retail business establishments in Fresno and Madera Counties classified in the Donaghy sales database within one of the following channel descriptions and channel id numbers (“Cid#”): a) Convenience/Cid# 190; b) Oil and Service/Cid# 195; c) Grocery/Cid# 265; d) Gas and Convenience/Cid# 294; e) Package Liquor/Cid# 200; f) Mom and Pop/Cid# 175; g) Deli/Cid# 180; h) Bodega/Cid# 185; and i) Package Liquor/Cid# 290, and which purchased from Donaghy beer manufactured and/or sold by Anheuser-Busch during the period from October 10, 2010 through December 31, 2014 excluding Vikram and Vinay Vohra and Hardeep Singh and all entities owned, controlled by or affiliated with any of them.

If you received a post card notification of this lawsuit with a claim identification number, you are within the class. If you were a beer retailer in Fresno and Madera Counties and purchased A-B beer from Donaghy between October 10, 2010 and December 31, 2014 and you are unsure whether you fell into one of these Donaghy sales category descriptions, you can inquire with the Settlement Administrator by emailing info@FresnoBeerLitigation.com or calling 1-888-352-1373.

The Court designated Manmohan Dhillon, Satnam Pabla, Serge Haitayan, Daljit Singh and Parminder Singh as the Class Representatives and appointed the law firms of Gustafson Gluek, PLLC and XXXXXX as Class Counsel.

To view the order granting preliminary approval of the proposed settlement, go to XXXXX

In a class action, a person or entity called the “class representative” sues on behalf of others who have similar claims. If the class settlement is approved by the Court, the settlement resolves the case for all class members, except for those who exclude themselves from the Class.

The Class Representatives and Defendants agreed to a settlement to avoid the cost and risk of further litigation and so that the class members may receive payments more quickly. The Class Representatives and Class Counsel believe that the settlement is in the best interests of all class members.

B. THE SETTLEMENT BENEFITS—WHAT YOU GET AND HOW TO GET IT

If you are a class member, the settlement provides you with your proportionate share of the \$2.5 million dollar settlement after deduction for any allowed attorneys’ fees and expenses, service awards to the class representatives, and costs of notice and administration of the settlement. Your proportionate share will be calculated based upon your purchases of A-B beer from Donaghy during the period from October 10, 2010, through December 31, 2014 (the “class period”).

Class Members may claim in one of two ways:

- 1) If you have been identified as a class member from Donaghy’s sales records, a postcard notice will be sent to you at the last known address in Donaghy’s sales records. Using the information on that postcard notice, you can log onto the Settlement website at www.FresnoBeerLitigation.com, see your purchase total for the class period, and complete your Claim Form online.
- 2) Alternatively, you request a Claim Form by calling 1-888-352-1373 and submit your claim by mail along with any required information.

Whether submitted online or mailed, the Claim Form must be signed and submitted online or postmarked by [date] to the following address:

Fresno Beer Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134

It is important to keep the Settlement Administrator informed of your current mailing address and contact information. Please visit the Settlement Website at www.FresnoBeerLitigation.com, call 1-888-352-1373, or email info@FresnoBeerLitigation.com to provide updates.

If the settlement becomes final, class members who do not exclude themselves from the class will release Defendants from liability and will not be able to sue the Defendants about the issues in the lawsuit. Section 13 of the Settlement Agreement describes the released claims in necessary legal terminology, so read it carefully. The full Settlement Agreement is available at www.FresnoBeerLitigation.com. You can talk to one of the lawyers below for free or you can, of course, talk to your own lawyer at your own expense if you have questions about the released claims.

C. EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue over the legal issues in the lawsuit, i.e. whether the Defendants illegally discriminated in the pricing of beer to you during the period commencing on October 10, 2010 and ending on December 31, 2014, then you must take steps to exclude yourself from this settlement. This is also known as “opting out” of the Class.

If you exclude yourself, you do not get settlement benefits, but the settlement will not prevent you from suing Defendants in the future about whether Defendants discriminated in the pricing of beer to you during the period commencing on October 10, 2010 and ending on December 31, 2014. If you exclude yourself, you will not be bound by anything that happens in this lawsuit.

Unless you exclude yourself, you give up the right to sue Defendants for the claims resolved by this settlement. If the settlement is finally approved, you will be permanently barred from initiating or continuing any lawsuit or other proceeding against Defendants about the issues resolved in the lawsuit.

To exclude yourself from the settlement, you must mail a written, signed request for exclusion postmarked or received no later than XXX. You must include the case name in the exclusion request: *Manmohan Dhillon, et. al. v. Anheuser Busch, LLC et al.* CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno Cty.).

Mail the request for exclusion to:

Fresno Beer Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134

The letter needs to include a statement indicating that you purchased A-B beer in Fresno or Madera Counties from Donaghy at some time during the period beginning on October 10, 2010, and ending on December 31, 2014 and your intent to opt out such as: “I request exclusion from the class in *Dhillon v. Anheuser Busch, LLC.*” The letter must be signed by you and: (i) provide your full name; (ii) the

name and address of the business which purchased A-B beer from Donaghy during the period between October 10, 2010 and December 31, 2014, (iii) your relationship to that business during that time (for example, owner) and (iv) your current contact information.

You have the right to seek independent legal advice on whether to stay in or opt out of the class.

D. OBJECTING TO THE SETTLEMENT

You can tell the court if you object to all or part of the settlement.

If you are a Class Member, and you do not exclude yourself from the Class, you can object to the settlement if you do not like some part of it or all of it.

To object, you must send a written objection signed by you.

The objection must include: (a) the name of the lawsuit Dhillon et al. v. Anheuser Busch, LLC, et al. CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno Cty.); (b) your full name, telephone number, address and relationship to the company on whose behalf the objection is made; (c) the name of the person or company which purchased A-B beer from Donaghy at some time during the period from October 10, 2010 and December 31, 2014; d) if represented by counsel, the full name, telephone number, and address of all such counsel; (e) all of the reasons for your objection; (f) whether the objector intends to appear at the Final Approval Hearing on his or her own behalf or through counsel; and (g) the objector’s dated, handwritten signature (an electronic signature or attorney’s signature is not sufficient).

Objections must be mailed to four places:

Fresno County Superior Court	Dennis Stewart	Joseph Goldberg	Darryl J. Horowitz
Attn: Clerk of the Court	Gustafson Gluek PLLC	Freedman Boyd Hollander &	Coleman & Horowitz, LLP
Civil Unlimited	600 W. Broadway	Goldberg P.A.	499 W. Shaw Avenue
1130 O Street	Suite 3300	20 First Plaza	Suite 116
Fresno, CA 93721-2220	San Diego, CA 92101	Suite 700	Fresno, CA 93704
		Albuquerque, NM 87102	

Objections must be filed with the Court and received by the attorneys no later than **XXXXXX**.

Excluding yourself is telling the court that you do not want to be part of the class. If you exclude yourself, you have no basis to object because the settlement no longer affects you. Objecting is telling the court that you do not like something about the settlement or the applications for attorneys fees, expenses or service awards to the representative Plaintiffs. You can object only if you stay in the class.

If you are a class member and you do nothing, you will remain a class member and all the Court’s orders will apply to you, you will be eligible for settlement benefits, and in exchange for the benefits you will release Defendants from further liability regarding the issues in the lawsuit.

E. THE LAWYERS REPRESENTING THE CLASS

The court has appointed lawyers to represent the Class. These lawyers are called “Class Counsel.” If you want to be represented by another lawyer, you may hire one at your own expense. Class Counsel’s information is as follows:

Dennis Stewart	Joseph Goldberg	Darryl J. Horowitz
Gustafson Gluek PLLC	Freedman Boyd Hollander & Goldberg	Coleman & Horowitz, LLP
600 W. Broadway	P.A.	499 W. Shaw Avenue
Suite 3300	20 First Plaza	Suite 116
San Diego, CA 92101	Suite 700	Fresno, CA 93704
	Albuquerque, NM 87102	

Class Counsel will ask the Court for an award of attorneys’ fees of \$625,000.00 (which is 25% of the Settlement Fund obtained for the Class) and reimbursement of litigation expenses they advanced in the course of the litigation in the approximate amount of \$750,000.00.

Class Counsel will also ask the Court to award the five (5) Class Representatives a service award in the amount of \$5,000.00 each (for a total of \$25,000.00) for the time and effort they spent representing Class Members.

The Court must approve the request for attorneys’ fees and expenses and the request for the service awards. The amounts awarded will be paid out of the Settlement Fund.

F. THE FINAL APPROVAL HEARING

The Court will hold a hearing on [DATE] at [PLACE] to decide whether to grant final approval to the settlement. If you have filed an objection on time and attend the hearing, you may ask to speak (provided you have previously filed a timely notice of intention to appear), but you do not have to attend or speak.

The Court will hold a Final Approval Hearing at XXXX.m. on XXX, in Department XXX of the Superior Court for the State of California, County of Fresno, located at XXXXX, Fresno, California. At this hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. At or after the hearing, the Court will decide whether to grant final approval of the settlement, and, if so, how much to pay the lawyers representing class members to reimburse them for expenses and the request for service awards for the representative Plaintiffs. We do not know how long these decisions will take.

Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it – but you can if you provide advance notice of your intention to appear. As long as you filed and served a written objection with all of the required information on time, the Court will consider it. You may also pay another lawyer to attend, but it is not required.

You or your attorney may ask the Court for permission to speak at the Final Approval Hearing. To do so, you must send a letter saying that it is your “Notice of Intention to Appear” in *Manmohan Dhillon, et al. v. Anheuser-Busch, LLC et al.* CASE NO. 14CECG03039 JMS (Sup. Ct. Fresno County). to the Clerk of Court so that it is received by the Court no later than , XXXXX. You must include the name, address, and telephone number, and signature of the Class Member, and, if represented by an attorney, the full name, telephone number, and address of all such counsel. You must also send a copy of your Notice of Intention to Appear to Class Counsel and Defendants’ Counsel at:

Class Counsel

Dennis Stewart
Gustafson Gluek PLLC
600 W. Broadway
Suite 3300
San Diego, CA 92101

Joseph Goldberg
Freedman Boyd Hollander & Goldberg P.A.
20 First Plaza
Suite 700
Albuquerque, NM 87102

Darryl J. Horowitz
Coleman & Horowitz, LLP
499 W. Shaw Avenue
Suite 116
Fresno, CA 93704

Defendants’ Counsel

Brian D. Wallach
Cadwalader, Wickersham & Taft LLP
700 Sixth Street, N.W.
Washington, DC 20001

Mark E. Chielpegian
CHIELPEGIAN • COBB
5200 North Palm Avenue, Suite 201
Fresno, CA 93704

G. GETTING MORE INFORMATION

This notice summarizes the proposed settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement and other information about the settlement at www.FresnoBeerLitigation.com. Documents filed in the lawsuit can be accessed at the court at the address provided above.

The settlement will not be final unless and until the Court grants final approval of the settlement at, or after, the Final Approval Hearing and after any appeals are resolved in favor of the settlement. Please be patient and check the website identified in this notice for updates.

EXHIBIT 4

If You Were a Retailer in Fresno or Madera Counties and Purchased Anheuser Busch Beer from Donaghy Sales LLC, a Settlement Has Been Reached that May Affect Your Rights.

VISIT WWW.FRESNOBEERLITIGATION.COM OR CALL 1-888-352-1373 FOR MORE INFORMATION

A Settlement has been proposed in a class action lawsuit against Anheuser Busch, LLC (“A-B”) and Donaghy Sales, LLC (“Donaghy”) (collectively “Defendants”). The Settlement resolves overcharge claims brought by certain retailers in Fresno and Madera counties who purchased A-B beer from Donaghy between October 10, 2010 and December 31, 2014 (the “Class Period”). Defendants deny all allegations of wrongdoing.

Who’s Included? You are included in the Settlement as a “Settlement Class Member” if you purchased A-B beer from Donaghy during the Class Period and owned retail business establishments in Fresno and Madera Counties and were classified in the Donaghy sales database within one of the following channel descriptions and channel id numbers (“Cid#”): a) Convenience/Cid# 190; b) Oil and Service/Cid# 195; c) Grocery/Cid # 265; d) Gas and Convenience/Cid# 294; e) Package Liquor/Cid# 200; f) Mom and Pop/Cid# 175; g) Deli/Cid# 180; h) Bodega/Cid# 185; and i) Package Liquor/Cid #290. Excluded from the Class are Vikram and Vinay Vohra and Hardeep Singh and all entities owned, controlled by or affiliated with any of them.

What does the Settlement provide? Under the Settlement, Defendants will pay a total of \$2.5 million dollars to resolve all valid claims made by Settlement Class Members, notice and administration costs, service awards, and attorneys’ fees and costs. Class Members who submit a valid claim will receive a pro-rata share of the funds remaining after payment of costs of administration and any attorneys fees and costs and service awards approved by the Court.

How do I get a Payment? You must complete and submit a Claim Form by **XXXX**. Claim Forms may be found and submitted online at www.FresnoBeerLitigation.com or mailed to Fresno Beer Settlement Administrator, P.O. Box 301134, Los Angeles, CA 90030-1134, postmarked no later than **XXXX**.

What are my other options? If you do nothing, your rights with respect to the claims made in the case will be affected and you won’t get a payment. If you don’t want to be legally bound by the Settlement, you must exclude yourself from it by **XXXX**. Unless you exclude yourself, you won’t be able to sue Defendants for any claim made in this lawsuit or released by the Settlement Agreement. If you stay in the Settlement (*i.e.*, don’t exclude yourself), you may object to it or ask for permission for you or your lawyer to appear and speak at the hearing—at your own cost—but you don’t have to. Objections and requests to appear are due by **XXXX**. More information about these options is available at www.FresnoBeerLitigation.com.

The Court’s hearing. The Court will hold a Fairness Hearing in this case (*Manmohan Dhillon, et al. v. Anheuser-Busch, LLC et al, Case No. 14ECG03039 JMS*) on **XXX, 20XX**. At the hearing, the Court will decide whether to approve the Settlement; Class Counsel’s request for attorneys’ fees and costs (up to 25% of \$2.5 million dollars); and service awards to the Class Representatives (up to \$25,000 total). You or your lawyer may appear at the hearing at your own expense.

Questions? Go to www.FresnoBeerLitigation.com, or call 1-888-352-1373.

EXHIBIT 5

Fresno Beer Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134



DNH

VISIT THE SETTLEMENT WEBSITE BY
SCANNING THE PROVIDED QR CODE

«Barcode»

Postal Service: Please do not mark barcode

Claim#: DNH-«Claim8»-«CkDig»

«FirstNAME» «LastNAME»

«Addr1» «Addr2»

«City», «State»«FProv» «Zip»«FZip»

«FCountry»

Plaintiff v. Defendant

COUNTY SUPERIOR COURT

Case No. XXXXXXXX

**Must Be Postmarked
No Later Than
Month XX, 2020**

Claim ID: <<Claim8>>

PIN: <<PIN>>

Settlement Claim Form

This Claim Form should be completed and submitted online at www.FresnoBeerLitigation.com or submitted by mail at the address below. Please refer to the Settlement Notice posted on the settlement website, www.FresnoBeerLitigation.com, for more information. The Settlement Administrator will use this information for all communications regarding this Claim Form and the Settlement.

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY: XXXX

CLASS MEMBER INFORMATION

Business Name					
First Name		M.I.	Last Name		
Primary Address					
City				State	ZIP Code
Email Address					
Area Code	Telephone Number (Home)	Area Code	Telephone Number (Work)		

PURCHASES OF ANHEUSER-BUSCH PRODUCTS FROM DONAGHY SALES DATABASE

2010	2011	2012	2013	2014	Total
<<2010Amt>>	<<2011Amt>>	<<2012Amt>>	<<2013Amt>>	<<2014Amt>>	<<TotalAmt>>



FOR CLAIMS PROCESSING ONLY	OB <input type="text"/>	CB <input type="text"/>	<input type="radio"/> DOC <input type="radio"/> LC <input type="radio"/> REV	<input type="radio"/> RED <input type="radio"/> A <input type="radio"/> B
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I am the authorized representative of the retailer making this claim, and the information supplied in this Claim Form is true and correct to the best of my recollection. I understand that I may be asked to provide supplemental information by the Settlement Administrator before my claim will be considered complete and valid.

Signature: _____ Dated (mm/dd/yyyy): _____

Print Name: _____

The deadline to submit this Claim Form is **XXXX**.

This Claim Form may be submitted online at www.FresnoBeerLitigation.com or completed and mailed to the address below. Please type or legibly print all requested information in blue or black ink. Mail your completed Claim Form, along with any supporting documentation, by U.S. Mail to:

Fresno Beer Settlement Administrator
P.O. Box 301134
Los Angeles, CA 90030-1134

DO NOT SEND THIS CLAIM FORM TO THE COURT

