

1 GUSTAFSON GLUEK PLLC
2 DENNIS STEWART, SBN: 99152
3 600 W. Broadway, Suite 3300
4 San Diego, CA 92101
5 Telephone: (619) 595-3299
6 Facsimile: (612) 339-6622

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Superior Court of California
County of Fresno
By: Samantha Mancinas, Deputy

7 COLEMAN & HOROWITT, LLP
8 DARRYL J. HOROWITT, SBN: 100898
9 SHERRIE M. FLYNN, SBN: 240215
10 499 West Shaw, Suite 116
11 Fresno, CA 93704
12 Telephone: (559) 248-4820
13 Facsimile: (559) 248-4830

14 Attorneys for Plaintiffs
15 [Additional Counsel on Signature Page]

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

**SUPPLEMENTAL DECLARATION OF
DEREK SMITH REGARDING NOTICE
ADMINISTRATION COSTS**

JUDGE: Honorable Jonathan M. Skiles

DATE: November 5, 2024

TIME: 3:30PM

DEPT: 403

1 I, Derek Smith, declare as follows:

2 1. I am employed as a Director of Class Action Services at Gilardi & Co., LLC,
3 (“Gilardi & Co.”), located at 1 McInnis Parkway, Suite 250 in San Rafael, CA. Gilardi & Co.
4 serves as the Court-appointed Settlement Administrator in this matter. As a Director at Gilardi &
5 Co., I oversaw the administrative services provided in this matter. I have personal knowledge of
6 the facts set forth herein and, if called as a witness, could and would testify competently thereto.
7

8 2. Gilardi’s estimated costs through completion of the administration total to
9 approximately \$58,000.00, with \$15,766.70 in Settlement Notice Costs already paid from the
10 escrow fund, \$25,773.30 in administration costs incurred, and approximately \$16,500.00 in
11 expected future costs.
12

13 3. The \$15,766.70 Settlement Notice Costs includes a National Change of Address
14 search for all Class Members of \$250.00, postage of \$460.06, document formatting costs of
15 \$2,025.83, print costs of \$876.72, website costs of \$4,345.00, media publication costs of
16 \$4,286.00, data setup of \$3,000.00, project setup costs of \$493.33, and sales tax of \$29.76.
17

18 4. The \$25,773.30 in administration costs incurred includes (after a courtesy discount
19 of \$5,000.00) claim processing for \$1,456.50, Website hosting and updates for \$745.00,
20 establishing a case specific email box for \$350.00, project management for \$16,788.75, call center
21 fees and call handling of \$3,809.51, PO Box fee of \$500.00, postage of \$1.46, Notice request
22 mailings of \$1.50, data update costs of \$2,613.33, document formatting costs of \$148.75, print set
23 up of \$450, mail receipt costs of \$297.50, class member email correspondence of \$1,921.00, and
24 reporting and declarations of \$1,690.00.
25

26 5. The incurred administration costs were greater than originally estimated because of
27 increases in the costs for notice publication, claim processing from mailed and emailed claim
28

1 forms, class member correspondence (via email and phone call reminders), class member searches
2 for phone numbers and email addresses, and in-person noticing

3 6. The \$16,500.00 in expected future costs includes issuing 158 checks of \$79.00,
4 postage of \$115.34, call center fees and call handling of \$462.50, website hosting and updates for
5 \$400.00, Settlement Fund tax return of \$1,750.00, accounting costs of \$6,850.00, data updates of
6 \$480.00, project management of \$2,700.00, class member email correspondence and check follow-
7 up of \$850.00, undeliverable mail processing of \$255.00, PO box fees of \$500.00, reissue
8 processing of \$425.00, reporting and declarations of \$600.00, and sales tax of \$1,299.75.
9

10
11 7. In Gilardi's experience, all the costs and expenses described above are reasonable
12 and necessary to provide notice to the class members, to encourage participation and to
13 effectively administer the claims process. The costs are within the range we would expect for a
14 claims notice and processing an administration of this size and nature.

15
16 I declare under penalty of perjury that the foregoing is true and correct. Executed the 8th
17 of November 2024 at Petaluma, California.

18
19 
20 _____
21 DEREK SMITH
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