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11 *Attorneys for Plaintiff*  
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13 **IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 JEFFREY CHEN,  
16 Plaintiff,  
17 vs.  
18 CHASE BANK, USA, N.A.,  
19 Defendant.

Case No. 19-cv-01082-JSC

**DECLARATION OF JEANNE CHERNILA  
REGARDING POST-DISTRIBUTION  
ACCOUNTING**

1 I, JEANNE CHERNILA, declare and state as follows:

2 1. I am a Project Manager with KCC Class Action Services, LLC (“KCC”), located at  
3 1 McGinnis Parkway Suite 250, San Rafael, California 94903. KCC is the appointed Settlement  
4 Administrator for this matter, and I have personally provided day-to-day oversight and support for  
5 the parties. I have personal knowledge of the matters stated herein and, if called upon, could and  
6 would testify thereto.

7 2. Under the Settlement Agreement, Chase agreed to pay a total of \$244,659 (exclusive  
8 of attorneys’ fees and costs) to resolve plaintiff’s claims. After subtracting the court-approved  
9 incentive award of \$5,000 and \$59,242.46 in settlement administration costs, the net settlement  
10 fund was \$180,416.54.

11 3. 2,987 valid claim forms were submitted. On August 19, 2020, 2,987 checks for  
12 \$60.40 each were mailed to eligible class members. 190 checks were not cashed by the February  
13 15, 2021 stale date, resulting in residual funds of \$11,477.74.

14 4. KCC estimated the cost for a second distribution to the 2,797 class members who  
15 cashed their checks at \$9,589, so the parties and KCC concluded that a second distribution to class  
16 members was not feasible.

17 5. The final distribution of settlement funds occurred on April 21, 2021 when KCC  
18 made a *cy pres* distribution of \$11,477.74 to the California Reinvestment Coalition.

19 6. The following chart is accurate based on KCC’s records:

20 Total settlement fund (inclusive and exclusive of attorneys’ fees and costs paid separately from class funds)	\$429,659	\$244,659
21 Net settlement fund	\$180,416.54	
22 Total number of class members	18,173	
23 Total number of class members to whom notice was sent and not returned as undeliverable	16,829	
24 Number and percentage of valid claim forms submitted	2,987	16.4%
25 Number and percentage of opt-outs	10	.055%
26 Number and percentage of objections	0	
27 Average and median recovery per claimant	\$60.40	
28 Largest and smallest amounts paid to class members	\$60.40	
Methods of notice	Email and Mail	

Method of payment to class members	Check	
Number and value of checks not cashed	190	\$11,476.00
Amount distributed to each <i>cy pres</i> recipient	\$11,477.74 to California Reinvestment Coalition	
Administrative costs	\$59,242.46	
Incentive award	\$5,000	
Attorneys' fees and costs	\$176,473.93	\$8,526.07
Attorneys' fees in terms of percentage of the settlement fund (inclusive of attorneys' fees and costs), and the multiplier, if any	41.1%	.67

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 21, 2021 at San Rafael, California.

*Jeanne Chernila*  
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 JEANNE CHERNILA

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