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7 *Attorneys for Plaintiffs and the Class*
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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

14 CAT BROOKS and RASHEED
15 SHABAZZ, individually and on behalf of
all others similarly situated,

16 Plaintiffs,

17 v.

18 THOMSON REUTERS CORPORATION,

19 Defendant.
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Case No. 3:21-cv-01418-EMC-KAW

**DECLARATION OF JONATHAN P.
SHAFFER OF ANGEION GROUP
RE: SETTLEMENT ADMINISTRATION
COSTS**

1 I, Jonathan P Shaffer, hereby declare the following pursuant to 28 U.S.C. §1746:

2 1. I am a Project Manager with Angeion Group (“Angeion”), located at 1650 Arch
3 Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this
4 action and I have personal knowledge of the facts set forth herein.

5 2. The purpose of this declaration is to provide the Court with the Settlement
6 Administration costs through October 31, 2024 in accordance with this Court’s *Order Granting*
7 *Preliminary Approval of Class Action Settlement* (Dkt. No. 259).

8 **ADMINISTRATION EXPENSES**

9 3. As of October 31, 2024, Angeion has incurred \$276,667.10 in administration
10 expenses. The chart below illustrates the fees broken down by category.

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Description	Amount
Costs to Implement Notice, Including CAFA Notice	\$235,618.00
Claims Processing and Opt Out, Objection & Class Member Related Processing	\$18,165.60
Settlement Website & Call Center	\$11,652.50
Case and Document Management, Project Management and Reporting	\$11,231.00
Total	\$276,667.10

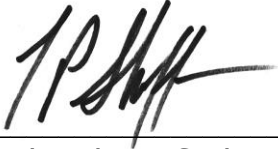
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17 4. Angeion will keep the Parties and the Court apprised of notice and administration
18 costs incurred.

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20 I hereby declare under penalty of perjury that the foregoing is true and correct.

21 Dated: December 9, 2024

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23 JONATHAN P. SHAFFER
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