

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a)	
Delaware Limited Liability Company, and)	
MICHIGAN MULTI-KING, INC., a)	No. 2:08-cv-00235-CCC-JAD
Michigan Corporation, on Behalf of)	
Themselves and All Those Similarly)	<u>CLASS ACTION</u>
Situated,)	
)	
Plaintiffs,)	SUPPLEMENTAL
)	DECLARATION OF
vs.)	ERIC J. MILLER REGARDING
)	NOTICE ADMINISTRATION
THOSE CERTAIN UNDERWRITERS AT)	
LLOYD’S, LONDON MEMBERS OF)	
SYNDICATES, et al.)	
)	
Defendants.)	
)	

I, Eric J. Miller, hereby declare as follows:

1. I am a Senior Vice President of A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”) in Milwaukee, Wisconsin. My business address is 5080 PGA Blvd., Suite 209, Palm Beach Gardens, Florida 33418, and my telephone number is (561) 336-1801.

2. I submit this Declaration as a supplement to my previously submitted declaration, the Declaration of Eric J. Miller Regarding Notice Administration, dated August 13, 2019 (the “Initial Notice Declaration”). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

DISSEMINATION OF DIRECT-MAIL NOTICE

3. Since the execution of my Initial Notice Declaration, A.B. Data has not received any additional names and addresses of policyholders from the Settling Defendants' coverholders. Through September 9, 2019, A.B. Data has mailed a total of 197,059 copies of the Summary Notice to potential Settlement Class Members.

SETTLEMENT WEBSITE

4. A.B. Data continues to maintain a secure, dedicated informational website, www.SyndicateSettlement.com (the "Settlement Website").

5. The Settlement Website became operational on May 14, 2019 and provides links to download copies of, among other documents, the Long-form Notice and Claim Form. In addition, copies of the Second Amended Complaint, Opinion Denying Defendants' Motion to Dismiss, Order Denying Defendants' Motion to Dismiss the Second Amended Class Action Complaint, Stipulation of Partial Class Action Settlement, Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Partial Class Action Settlement and the Preliminary Approval Order are available to view or download. The website also contained the Claims Administrator's toll-free number and contact information of Co-Lead Counsel. A link to the Settlement Website was also posted on the respective websites of the law firms of Co-Lead Counsel.

6. As of September 9, 2019, there have been 32,281 unique visitors to the website and 74,782 webpages have been served to visitors.

TOLL-FREE TELEPHONE HELPLINE AND EMAIL

7. On June 17, 2019, A.B. Data established a case-specific toll-free telephone helpline, (877) 298-4134, with an interactive voice response (“IVR”) system and live operators.

8. A.B. Data continues to maintain the toll-free telephone helpline, which is accessible 24 hours a day, 7 days a week, with live operators available from 8:00 a.m. to 5:00 p.m. Central Time, Monday through Friday. As of September 9, 2019, the toll-free number has handled a total of 1,673 calls for 1,821 minutes of use. Live operators have handled more than 1,000 inbound and outbound calls.

9. A.B. Data also maintains a case-dedicated email address, info@SyndicateSettlement.com, to allow potential Settlement Class Members to email the Claims Administrator with questions or inquiries. As of September 9, 2019, A.B. Data has received and processed a total of 282 email inquiries from potential Settlement Class Members.

EXCLUSION PROCESSING

10. As explained in the Summary and Long-Form Notices, exclusion requests were to be mailed to Syndicate Settlement Claims Administrator, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217 so that they are postmarked or received by August 28, 2019.

11. As of the date of this Declaration, A.B. Data has received fourteen exclusion requests. A report listing the fourteen exclusions received is attached hereto as Exhibit A.

CLAIMS

12. As of September 9, 2019, more than 2,796 claims have been filed in this matter.

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

Executed this 10th day of September, 2019.



Eric J. Miller

EXHIBIT A

Exclusion Report

September 10, 2019

		Exclusion ID	Timely
1	Mercedes & Tomas Gonzales	64254654	Yes
2	Esther Westernoff, Fern Westernoff, Tina Westernoff Davis	64254655	Yes
3	XTO Energy Inc. and its parent, Exxon Mobil Corporation and all subsidiaries, affiliates, and thereof	64254656	Yes
4	Chickasaw Nation	64254657	Yes
5	Great Northern and Southern Navigation Co, LLC French America Lines (f/k/a Great Northern and Southern Navigation Company, LLC)	64254658	Yes
6	Venkata Sivalakshmi Sirigiri	64254659	Yes
7	Cabarrus Gastroenterology Associates, PLLC	64254660	Yes
8	Summer Herbal Inc. (f/k/a RG Herbals, Inc.)	64254661	Yes
9	Merck & Co., Inc. and its subsidiaries, including International Indemnity Limited	64254662	Yes
10	Raymond & Loretta Busefink	64254663	Yes
11	Kissel Hirsch & Wilmer LLP	64254664	Yes
12	Collier County Board of Commissioners	64254665	Yes
13	Robert L. & Lynn A. Burr	64254666	Yes
14	Southern California Pizza Company, LLC	64254667	Yes