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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CORLYN DUNCAN, et al.,

Plaintiffs,

v.

THE ALIERA COMPANIES, INC., f/k/a
ALIERA HEALTHCARE, INC., a Delaware
corporation; TRINITY HEALTHSHARE,
INC., a Delaware corporation; and
ONESHARE HEALTH, LLC, formerly known
as UNITY HEALTHSHARE, LLC and as
KINGDOM HEALTHSHARE MINISTRIES,
LLC, a Virginia limited liability corporation,

Defendants.

Case No. 2:20-CV-00867-TLN-KJN

**DECLARATION OF TINAMARIE FEIL
REGARDING CLASS NOTICE**

Hearing

Date: January 11, 2024
Time: 2:00 p.m.
Courtroom: 2
Hon. Troy L. Nunley

1 Tinamarie Feil states:

2 1. I am over eighteen years of age, and I believe the statements contained herein are
3 true based on my personal knowledge. I act as President of Client Services at BMC Group, Inc.,
4 and my business address is c/o BMC Group, Inc., 3732 West 120th Street, Hawthorne, CA 90250.

5 2. In accordance with this Court's Order [ECF. No. 114] dated June 15, 2023, BMC
6 Group, Inc. ("BMC Group") was appointed Settlement Administrator authorized and instructed to
7 perform class notice by disseminating the approved notice materials ("Notice Materials") to all
8 reasonably identifiable Settlement Class members by email, and for those Settlement Class
9 members for whom no email address is available and a physical address is available, by U.S. Mail,
10 and through publication of the dedicated settlement website, including any required processing of
11 changes of address.

12 3. Class Data. On June 20, 2023, BMC Group was provided access to 7 files (the
13 "Source Files") containing contact information of potential class members. 149,713 unique emails
14 were identified from the Source Files.

15 4. Notice Materials Dissemination.

16 (a) On August 4, 2023, I confirmed that the dedicated settlement website
17 www.symslaw.com/unitysettlement containing Notice Materials was published and operational;
18

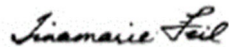
19 (b) On August 4, 2023, BMC Group transmitted email notification to 149,713 parties.
20 5,618 of those emails were bounced as undeliverable. On August 15, 2023, BMC Group mailed
21 the Notice Materials via first class, postage prepaid, to 1,629 of the email undeliverable parties for
22 whom physical addresses were available. BMC Group then performed reverse email research on
23 3,989 remaining undeliverable email records and was able to locate physical addresses for 651
24 parties. On August 18, 2023, BMC Group mailed the Notice Materials via first class, postage
25 prepaid, to those 651 parties. In each instance of preparing a first-class mailing, BMC Group runs
26 a query against the National Change of Address Database ("NCOA") database maintained by the
27
28

1 United States Postal Service (“USPS”) and uses updated addresses in executing the service.

2 (c) On September 13, 2023 first class mail sent to 14 parties for whom BMC Group
3 has received mail returned as undeliverable and were able to obtain updated changes of address
4 through NCOA.

5
6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct.

8 DATED: September 14, 2023, at Seattle, Washington, USA.

9
10 

11 _____
Tinamarie Feil