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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE: PACKAGED SEAFOOD
PRODUCTS ANTITRUST
LITIGATION

Case No. 15-MD-2670 DMS (MSB)

**DECLARATION OF LARA
JARJOURA RE: CLAIMS
ADMINISTRATION STATUS
UPDATE**

This Document Relates to:
End Payer Plaintiffs Class
Track

1 I, Lara Jarjoura, declare and state as follows:

2 1. I am a Vice President at JND Legal Administration (“JND”). This
3 Declaration is based upon my personal knowledge, as well as upon information
4 provided to me by experienced JND employees and Class Counsel, and if called
5 upon to do so, I could and would testify completely thereto.

6 2. JND is a legal administration services provider with its headquarters
7 located in Seattle, Washington. JND has extensive experience in all aspects of legal
8 administration and has administered settlements in hundreds of cases.

9 3. JND is serving as the Claims Administrator in the above-captioned
10 matter, pursuant to the Court’s Order Granting End Payer Plaintiffs’ Motion for
11 Preliminary Approval of Partial Settlement (“COSI Settlement”), filed January 26,
12 2022, Dkt. No. 2734 and the Court’s Order Granting End Payer Plaintiffs’ Motion
13 for Preliminary Approval of Class Action Settlements (“StarKist and Lion
14 Settlement”), filed August 23, 2024, Dkt. No. 3302.

15 4. Jennifer Keough previously submitted a Declaration Regarding
16 Proposed Plan for COSI Settlement Notice on behalf of End Payer Plaintiffs (“COSI
17 Notice Declaration”), filed August 29, 2019, Dkt. No. 1941-1. Gina Intrepido-
18 Bowden previously submitted a Declaration Regarding Proposed Settlement Notice
19 Plan for StarKist and Lion Settlements on Behalf of End Payer Plaintiffs, filed
20 August 13, 2024 (“StarKist and Lion Notice Declaration”), Dkt. No. 3286-3. I
21 submit this Declaration to provide an update regarding the claim review and
22 distribution processes, as well as to summarize the administration costs to date, and
23 the estimated fees and expenses for the administration of the COSI, StarKist and
24 Lion Settlements.

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CLAIMS PROCESS

5. As previously described in the COSI and StarKist and Lion Notice Declarations, Class Members were able to file their claim online or via postal mail. There were 443,892 claims filed in the StarKist and Lion Settlements, of which 437,522 were received through the secure online portal and 6,370 were received through postal mail. Across all Tuna End Payer Plaintiffs’ Settlements, a total of 980,568 claims were filed.

LATE CLAIMS

6. JND also received 310 Late Claims, which were received after the claim filing deadline of December 31, 2024. The most recent Late Claim was received in March 2026. We understand that Class Counsel plans to seek Court approval for acceptance of these Late Claims. Class Counsel has advised JND that any further Late Claims beyond the initial 120-day grace period (ending on April 30, 2025) will be denied. Accepting these nominally late claims avoids further administration costs associated with claimant outreach and determining the validity of the claims on the grounds of lateness.

FRAUD PROCESSES

7. JND has measures in place to assist with detecting and preventing fraud, including a proprietary set of technical and operational controls. Throughout the claim filing period, JND monitored the case website for suspicious activity, including disproportionate spikes in traffic and new users that exceed the expected traffic based on our notice program. JND utilized watchlists of known bad actors to identify suspicious submissions. Additionally, JND evaluated duplicate claim submissions from the same individual or household, high-value claims, addresses claiming high volumes of Tuna purchases.

1 8. JND reviewed, processed, and determined the validity of all claims
2 submitted. During the claim validation process, JND undertook de-duplication steps
3 such as analyzing and standardizing claimant addresses to ensure a single claim per
4 claimant. JND also reviewed the PayPal email addresses to ensure multiple
5 payments are not directed to a single PayPal email address.

6
7 DEFICIENCY NOTICES

8 9. In total, across all Tuna End Payer Plaintiffs' Settlements, JND sent
9 207,825 deficiency notices to claimants whose claims were determined to be
10 deficient. Examples of deficiencies include: (i) claimants who failed to sign a mailed
11 Claim Form, (ii) claimants who failed to provide purchase information, (iii)
12 claimants who submitted both a Claim Form and a valid request for exclusion from
13 the Settlements, (iv) individual claimants who provided a total purchase quantity of
14 Packaged Tuna that is greater than the "Threshold" (the maximum quantity
15 purchased during the Class Period that, in consultation with Class Counsel, was
16 determined to be reasonable for typical household consumption), and (v) other
17 defects that make it impossible for JND to fully process the claim.

18 10. JND reviewed all responses to the deficiency notices to determine if the
19 required information was provided. In the case of claims that exceeded the
20 Threshold, if the claimant made the effort to timely respond to the deficiency notice
21 via postal mail, included a copy of their government-issued ID, and provided an
22 updated quantity under the Threshold, their claim was approved. If their response
23 to the deficiency notice did not provide an updated quantity or the quantity provided
24 was above the Threshold, the purchases were capped at the Threshold. If the
25 deficiency response did not include a copy of the claimant's government-issued ID,
26 was sent via email, or raised additional concerns, the claim was denied. Any claim
27 that was denied after review of a deficiency response was subsequently sent a denial
28 letter. There were eleven deficiency responses received from entities claiming

1 donated Packaged Tuna in amounts exceeding the Threshold. After discussion with
2 Class Counsel, and verification of these Class Members (i.e. reviewing tax
3 documents, declarations, sample documentation, and cross-referencing with claims
4 in the Direct Purchaser Settlements etc.), their claims were approved for the full
5 amount they claimed.

6
7 **DISTRIBUTION PROCESS**

8 11. JND will calculate, on a *pro rata* basis, individual Class Member
9 distribution amounts and will apply a \$5.00 *de minimus* payment threshold as
10 specified in the Claim Form and the Long Form Notice. Distribution payments will
11 be sent via check or PayPal to the Claimant’s address or PayPal email address listed
12 on their Claim Form (or as subsequently updated by the Claimant).

13 12. Prior to issuing payments via check, JND will update the contact
14 information for Class Members using the National Change of Address (“NCOA”)
15 database.¹ If the check is returned as undeliverable, JND will use advanced skip-
16 trace technology to identify an updated address, if available, to remail the check.

17 13. Prior to issuing payments via PayPal, JND will review and confirm the
18 validity of the email address and default to check if necessary. If the PayPal payment
19 fails, JND will reissue the payment in the form of a check to the address provided
20 by the Claimant.

21 14. JND is prepared to commence issuing distribution payments within 30
22 days of funding of the distribution account.

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25 ¹ The NCOA database is the official United States Postal Service (“USPS”)
26 technology product which makes change of address information available to mailers
27 to help reduce undeliverable mail pieces before mail enters the mail stream. This
28 product is an effective tool to update address changes when a person has completed
a change of address form with the USPS. The address information is maintained in
the database for 48 months.

1 15. After consultation with Settlement Class Counsel, JND agrees with the
2 following proposed schedule for distribution of the Net Settlement Fund:

3 **SCHEDULE FOR SETTLEMENT DISTRIBUTION**

4

TIMING	EVENT
10 days AFTER DISTRIBUTION ORDER IS SIGNED	Settlement Class Counsel will transfer the net settlement funds to JND for distribution (“FUND TRANSFER”).
30 days AFTER FUND TRANSFER	JND will initiate distribution of the funds via check and electronic payment depending on the authorized claimants request for payment (“DISTRIBUTION”).
60 days AFTER DISTRIBUTION	All checks canceled and subject to re-distribution to check recipient upon updated information.
120 days AFTER DISTRIBUTION	Settlement Class Counsel will file a status report updating the Court on the status of distribution process.
180 days AFTER DISTRIBUTION	Final Accounting to the Court re: distribution of net settlement funds and approval of distribution of unclaimed funds to <i>cy pres</i> recipient.

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20 **RECORDS RETENTION AND DESTRUCTION**

21 16. JND will destroy paper copies of all Claims and supporting
22 documentation one year after the final accounting of the Net Settlement Fund.

23 17. JND will destroy the electronic copies of the Proofs of Claim and all
24 supporting documentation two years after the final accounting of the Net Settlement
25 Fund.

1 **ADMINISTRATION FEES AND EXPENSES**

2 18. JND estimated that overall administration costs for the StarKist and
3 Lion Settlements (which includes the Notice campaign, Claims Administration, and
4 Distribution) would range between \$2,100,000 and \$5,800,000.

5 19. In total, JND's invoiced administration fees and expenses across all
6 Settlements are \$4,625,150.11, of which \$3,996,940.53 has been paid and
7 \$628,209.58 remains outstanding.

8 20. JND estimates \$925,000 in administrative fees and expenses to
9 distribute the initial payments via check and PayPal. Of this, \$335,000 will be for
10 postage and other out-of-pocket passthrough expenses. Approximately \$230,000 is
11 associated with check printing and PayPal issuance as well as dissemination services
12 and bank account management and assistance with tax preparation. Given that the
13 initial claim submissions in the COSI Settlement were received prior to August
14 2022, we anticipate at least \$50,000 attributed to handling returned undeliverable
15 checks, researching for updated addresses, and processing reissues. Approximately
16 \$310,000 is associated with contact center support, IVR maintenance fees,
17 researching and responding to Class Member inquiries and payment reissue requests,
18 reissuing failed PayPal payments via check, database management, and website
19 maintenance.

20 21. JND has dedicated time to implementing the multiple Notice
21 campaigns; evaluating and verifying Claim Forms and supporting documentation;
22 reviewing and responding to claimant inquiries; claim deficiency processing and
23 outreach; preparing for the distribution of Settlement Funds; and ongoing
24 consultation with Class Counsel regarding the comprehensive claims review
25 process.

26 22. Since JND was retained as Claims Administrator in this matter in
27 January of 2022, we have worked consistently and in close coordination with Class
28

1 Counsel to ensure the Settlements are administered as efficiently as possible and in
2 compliance with the terms of the Settlement Agreements and this Court's orders.

3 I declare under penalty of perjury under the laws of the State of California
4 that the foregoing is true and correct.

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6 Executed on the 18th day of June 2026, at Seattle, Washington.

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Lara Jarjoura
Lara Jarjoura

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