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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

GOOD MORNING TO YOU
PRODUCTIONS CORP., et al.,

Plaintiffs,

v.

WARNER/CHAPPELL MUSIC, INC.,
et al.,

Defendants.

Lead Case No. CV 13-04460-GHK
(MRWx)

**DECLARATION OF TIFFANEY
JANOWICZ IN SUPPORT OF
PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENT**

Judge: Hon. George H. King, Chief
Judge
Date: Feb. 29, 2016
Time: 9:30 a.m.
Room: 650
Judge: Hon. George H. King
Chief Judge

I, Tiffaney Janowicz, hereby declare as follows:

1. I am a Senior Vice President of Rust Consulting, Inc. ("Rust"). I submit this declaration in connection with the above-captioned matter at the request of Counsel. I make this declaration based upon my own personal knowledge and, if called as a witness in this action, I would be able to competently testify as to the facts set forth herein. Attached as Exhibit A is my C.V., which outlines my experience and qualifications.

2. With nearly 30 years of class action settlement administration experience, Rust is among the industry's leaders. Rust has administered more than 5,200 class action settlements, judgments, and similar administrative programs, 2,000 of which were in the past five years alone. Rust employs a permanent staff of approximately

1 300 people working in offices nationwide. A C.V. outlining Rust's services and
2 experience is attached as Exhibit B.

3 3. Rust handles the claims administration process for class actions of all
4 sizes and types, including consumer, antitrust, securities, insurance, healthcare, labor
5 and employment, property, finance, telecom, and products liability class actions. In
6 the past, Rust has handled claims administration in, among many other matters, the
7 \$1.1 billion settlement in *Microsoft I-V Cases*, J.C.C.P. No. 4106 (Cal. Super. Ct. San
8 Francisco County); the \$65 million settlement in *In re Lawn Mower Engine*
9 *Horsepower Marketing and Sales Practices Litig.*, No. 2:08-md-1999, MDL No. 1999
10 (E.D. Wisc.); the \$316 million direct purchasers settlement in *In re TFT-LCD (Flat*
11 *Panel) Antitrust Litigation*, MDL No. 1827 (N.D. Cal.); the \$166 million settlement in
12 *In re Electronic Books Antitrust Litigation*, No. 11-md-2293 (S.D.N.Y.); and the \$125
13 million settlement in *In re Pharmaceutical Industry Average Wholesale Price*
14 *Litigation (All Class Actions Relating to Track Two Defendants)*, No.
15 01-CV-12257-PBS, MDL No. 1456. Rust has considerable experience in
16 administering class action settlements of all types and sizes and will use this
17 experience to develop and implement the claims administration process for this action.

18 4. I have reviewed the Settlement Agreement, the notice provisions therein,
19 and the Settlement Class Member Address List. I believe that the proposed settlement
20 notice and administration is typical to programs that Rust Consulting has implemented
21 in similar matters, as well as other such programs I am aware of.

22 5. Based on the proposed notice and administration plans outlined in the
23 Settlement Agreement, I estimate the cost of the entire program to be approximately
24 \$120,000. I am aware that, subject to the Court's approval, the first \$100,000 of notice
25 and administration expenses will be paid from the Settlement Fund. Rust has made
26 satisfactory arrangements with the Defendants to satisfy any additional notice and
27

1 administration expenses that may be incurred to comply with the notice and
2 administration plans set forth in the Settlement Agreement.

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

4 Executed this 23rd day of February, 2016.

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Tiffany Janowicz