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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BERNARD PAUL PARRISH, HERBERT ANTHONY ADDERLEY, and WALTER ROBERTS, III on behalf of themselves and all others similarly situated,

Plaintiff,

v.

NATIONAL FOOTBALL LEAGUE PLAYERS INCORPORATED, et al.,

Defendants.

Case No. C 07-00943 WHA

SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH IN SUPPORT OF CLASS COUNSELS' MOTION FOR APPROVAL RE SECOND DISTRIBUTION FROM THE SETTLEMENT FUND

I, JENNIFER M. KEOUGH, declare and states as follows:

1. I am Executive Vice President of the Garden City Croup, Inc. ("GCG"). I am submitting this declaration in support of Class Counsel's Motion Regarding the Second Distribution from the Settlement Fund and in response to the Court's July 6, 2010 Order styled "Questions to Counsel Regarding Final Distribution of Settlement Funds." The following statements are based on my personal knowledge and information provided by other GCG employees working under my supervision, and if called on to do so, I could and would testify competently thereto. I am over the age of 18, and competent to testify.

2. GCG was retained by the parties to the above-captioned litigation to serve as the Class Action Administrator as described in the Order Preliminarily Approving Proposed Settlement executed August 18, 2009 (the "Stipulation").

1 3. On December 11, 2011, GCG mailed 2,059 Class members a Claim Form and
2 Release (“Claim Form”). The Claim Form stated that the recipient must return a completed
3 Claim Form to GCG on or before February 9, 2010. GCG received completed Claim Forms
4 from 1,571 Class Members in connection with the initial mailing. The Claim Forms for 261 of
5 the Class Members were returned as “undeliverable.”

6 4. In total, 488 Class Members failed to return a completed Claim Form in
7 connection with the initial mailing. In March 2010, GCG mailed each of the 488 Class
8 Members who failed to return a Claim Form in connection with the initial mailing a second
9 Claim Form. The Claim Form stated that the recipient must return a completed Claim Form to
10 the Claims Administrator on or before June 1, 2010.

11 5. Prior to initiating the second mailing, however, Class Counsel instructed GCG to
12 conduct “advanced address searches” in an attempt to identify the addresses of the 261 Class
13 Members whose Claim Forms were returned as “undeliverable.” As part of the “advanced
14 address searches” GCG attempted to locate an updated address for the relevant Class Members
15 by submitting the name, address, phone number and, if available, Social Security number to
16 Choicepoint, a Lexis-based database that aggregates publicly available records, such as utilities
17 and financial records. In addition to the “advanced address searches”, GCG also used available
18 address information to look up class member phone numbers via reverse directory look-up on
19 the internet and subsequently made attempts to contact these individuals by phone in order to
20 get an updated address. The GCG communications team then conducted a calling campaign to
21 locate updated address information for class members whose Claim Forms were returned as
22 “undeliverable”.

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6. GCG mailed each of the 261 Class Members whose initial Claim Forms were returned as “undeliverable” a second claim form in March 2010. Of these Claim Forms, 203 were returned as “undeliverable” for a second time.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed July 12, 2010 in Seattle, Washington.


JENNIFER M. KEOUGH