

1 recipient must return a completed Claim Form to GCG postmarked on or before February 9,
2 2010.

3 4. In addition to the mailing, GCG created a website in order to disseminate
4 information to the Class. The website contained links to relevant information including the
5 Notice of Class Action Settlement. The website also set forth the date by which each Class
6 Member was required to return a completed Claim Form and the hotline number that GCG
7 established for this case.

8 5. GCG received completed Claim Forms from 1,571 Class Members in connection
9 with the initial mailing. In total, 488 Class Members failed to return a completed Claim Form in
10 connection with the initial mailing.

11 6. In March 2010, Class Counsel instructed GCG to conduct a second mailing for
12 those Class Members who had yet to submit a completed Claim Form. The Claim Form sent in
13 connection with the second mailing stated that the recipient must return a completed Claim
14 Form to the Claims Administrator on or before June 1, 2010.

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

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8. GCG mailed each Class Member who had yet to submit a Claim Form and for whom it had a known address 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 19, 2010 in Seattle, Washington.


JENNIFER M. KEOUGH