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11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA

13 IVAN BARON, Individually and on  
14 Behalf of All Others Similarly  
15 Situated,

16 Plaintiff,

17 v.

18 HYRECAR INC., JOSEPH FURNARI  
19 and ROBERT SCOTT BROGI,

20 Defendants.

Case No. 2:21-cv-06918-FWS-JC

Honorable Fred W. Slaughter

21 **SUPPLEMENTAL DECLARATION OF JOSEPHINE BRAVATA**  
22 **CONCERNING: (A) MAILING/EMAILING OF NOTICE; (B) REPORT ON**  
23 **REQUESTS FOR EXCLUSION AND OBJECTIONS; AND**  
24 **(C) CLAIMS RECEIVED TO DATE**

1 I, Josephine Bravata, declare as follows:

2 1. I am the Director of Quality Assurance at Strategic Claims Services  
3 (“SCS”), a nationally recognized class action administration firm.<sup>1</sup> I have over  
4 twenty years of experience specializing in the administration of class action cases.  
5 SCS was established in April 1999 and has administered over five hundred and fifty  
6 (550) class action cases since its inception. I have personal knowledge of the facts  
7 set forth herein and, if called on to do so, I could and would testify competently  
8 thereto.

9 **UPDATE ON MAILING/EMAILING OF NOTICE**

10 2. Pursuant to the Court’s Order Granting Lead Plaintiff’s Motion for  
11 Preliminary Approval of Class Action Settlement, dated July 19, 2024 (ECF No.  
12 128) (the “Preliminary Approval Order”), SCS was appointed as the Claims  
13 Administrator in the above-captioned Action. I submit this declaration as a  
14 supplement to my earlier declaration, the Declaration of Josephine Bravata  
15 Concerning: (A) Mailing/Emailing of Notice; (B) Publication of the Summary  
16 Notice; and (C) Report on Requests for Exclusion and Objections, dated October 8,  
17 2024 (ECF No. 136-2) (the “Initial Mailing Declaration”).

18 3. As reported in the Initial Mailing Declaration, as of October 8, 2024, a  
19 total of 7,235 Postcard Notices had been mailed to potential Settlement Class  
20 Members either by SCS or nominees. Additionally, as noted in the Initial Mailing  
21 Declaration, 6,637 emails containing a link to the Notice and Claim Form had been  
22 sent to potential Settlement Class Members by either SCS or a nominee.

23 4. Since the execution of the Initial Mailing Declaration, SCS received  
24 two additional names and addresses of potential Settlement Class Members from  
25 \_\_\_\_\_

26 <sup>1</sup> All capitalized terms used herein that are not otherwise defined have the meanings  
27 ascribed to them in the Stipulation and Agreement of Settlement, dated March 20,  
28 2024 (ECF No. 121-1) (the “Stipulation”).

1 nominees requesting that a Postcard Notice be mailed by SCS,<sup>2</sup> and a nominee  
2 provided SCS with an email address to email their client with the Notice and Claim  
3 Form link. To date, a total of 13,875 potential Settlement Class Members were either  
4 mailed a Postcard Notice or emailed a link to the Notice and Claim Form.

5 5. After the Initial Mailing Declaration was filed, 292 Postcard Notices  
6 were returned as undeliverable. Of these, the United States Postal Service provided  
7 19 forwarding addresses, and SCS promptly mailed another Postcard Notice to the  
8 updated addresses. The remaining 273 Postcard Notices returned as undeliverable  
9 were “skip-traced” to obtain updated addresses and 122 were re-mailed to updated  
10 addresses.

11 **UPDATE ON TOLL-FREE PHONE LINE**

12 6. As stated in the Initial Mailing Declaration, SCS maintains a toll-free  
13 telephone number (1-866-274-4004) for potential Settlement Class Members to call  
14 and obtain information about the Settlement. SCS continues to promptly respond to  
15 each telephone inquiry and address Settlement Class Members’ inquiries through the  
16 administration process.

17 **UPDATE ON SETTLEMENT WEBSITE**

18 7. On August 15, 2024, SCS established a case-specific website dedicated  
19 to the Settlement at [www.HyreCarSecuritiesSettlement.com](http://www.HyreCarSecuritiesSettlement.com) (the “Settlement  
20 Website”). The Settlement Website is accessible 24 hours a day, 7 days a week. The  
21 Settlement Website contains a home page; an important documents page; a file a  
22 claim online page; a nominees page; and a contact us page. On October 11, 2024,  
23 SCS posted to the important documents page to include: (a) Lead Plaintiff’s Notice  
24 of Unopposed Motion and Motion for Final Approval of Class Action Settlement

25 \_\_\_\_\_  
26 <sup>2</sup> Since the Initial Mailing Declaration, SCS received three requests from potential  
27 Settlement Class Members to mail them a Notice and Claim Form. SCS immediately  
28 mailed them a Notice and Claim Form.

1 and Plan of Allocation, (b) Lead Plaintiff’s Memorandum in Support of Unopposed  
2 Motion for Final Approval of Class Action Settlement and Plan of Allocation, (c)  
3 Lead Counsel’s Notice of Motion and Motion for an Award of Attorneys’ Fees and  
4 Reimbursement of Litigation Expenses, (d) Memorandum of Law in Support of Lead  
5 Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation  
6 Expenses, and (e) Declaration of Ex Kano S. Sams II Support of: (I) Lead Plaintiff’s  
7 Motion for Final Approval of Class Action Settlement and Plan of Allocation; and  
8 (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of  
9 Litigation Expenses with exhibits. To date, the Settlement Website has received  
10 3,050 pageviews from 1,092 unique users.

11 **UPDATE ON REPORT ON EXCLUSIONS AND OBJECTIONS**

12 8. The Postcard Notice, Notice, Summary Notice, and Settlement Website  
13 informed potential Settlement Class Members that written requests for exclusion  
14 were to be mailed to SCS such that they were received no later than October 24,  
15 2024. SCS has been monitoring all mail delivered for this case. To date, SCS has  
16 not received any exclusion requests.

17 9. The Postcard Notice, Notice, Summary Notice, and Settlement  
18 Website, further informed Settlement Class Members seeking to object to the  
19 Settlement, the proposed Plan of Allocation or Lead Counsel’s motion for an award  
20 of attorneys’ fees and reimbursement of Litigation Expenses, that objections must  
21 have been filed with Lead Counsel, Individual Defendants’ Counsel as well as the  
22 Clerk of the Court, on or before October 24, 2024. As of the date of this declaration,  
23 SCS has not been notified of any objections or received any misdirected objections.

24 **UPDATE ON CLAIMS RECEIVED TO DATE**

25 10. The deadline for claims submission is filed online at  
26 [www.HyreCarSecuritiesSettlement.com](http://www.HyreCarSecuritiesSettlement.com) by December 14, 2024 or postmarked no  
27 later than December 14, 2024. As of the date of this declaration, SCS has received  
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1 97 claims. A majority of the claims typically are submitted on or shortly before the  
2 claims filing deadline. SCS is currently processing the submitted claims. Since the  
3 claims filing has not passed, the number of claims considered valid has not yet been  
4 finally determined.

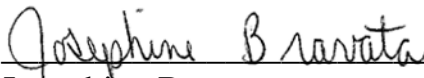
5 I declare under penalty of perjury under the laws of the United States of  
6 America that the foregoing is true and correct.

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8 Signed this 29<sup>th</sup> day of October 2024, in Media, Pennsylvania.

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Josephine Bravata

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