

1 Steven G. Sklaver (237612)  
ssklaver@susmangodfrey.com  
2 SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, 14th Floor  
3 Los Angeles, California 90067  
Telephone: (310) 789-3100  
4 Facsimile: (310) 789-3150

5 Seth Ard (*pro hac vice*)  
sard@susmangodfrey.com  
6 Ryan Kirkpatrick (243824)  
rkirkpatrick@susmangodfrey.com  
7 SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32nd Floor  
8 New York, New York 10019  
Telephone: (212) 336-8330  
9 Facsimile: (212) 336-8340

10 Kevin Downs (331993)  
kdowns@susmangodfrey.com  
11 SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
12 Houston, Texas 77002  
Telephone: (713) 651-9366  
13 Facsimile: (713) 654-6666

14 *Attorneys for Plaintiff*

15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

19 JOE S. YEARBY, on behalf of himself and all  
20 others similarly situated,  
21 Plaintiff,  
22 v.  
23 AMERICAN NATIONAL INSURANCE  
24 COMPANY,  
Defendant.

Case No. 3:20-cv-09222-EMC

**DECLARATION OF GINA INTREPIDO-  
BOWDEN REGARDING SETTLEMENT  
ADMINISTRATION**

1 I, Gina Intrepido-Bowden, hereby declare as follows:

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

6 2. JND is serving as the Settlement Administrator in the above-captioned litigation  
7 (“Action”) for purposes of administering the Joint Stipulation and Settlement Agreement  
8 (“Settlement Agreement”) as ordered by the Court in its Preliminary Approval Order (“Order”)  
9 (Dkt. 89), dated August 11, 2023. I previously submitted the Declaration of Gina Intrepido-Bowden  
10 Regarding the Proposed Settlement Notice Plan (Dkt. 82-4) on June 26, 2023, the Declaration  
11 Regarding Settlement Administration Expenses (Dkt. 90-3) on August 25, 2023, and the  
12 Declaration Regarding Proof of Notice Mailing (Dkt. 92) on September 11, 2023. I am submitting  
13 this Declaration to provide updates on the implementation of the Notice Plan and settlement  
14 administration.

15 **NOTICE MAILING**

16 3. As previously stated in my declaration dated September 11, 2023, on August 25,  
17 2023, JND mailed the Court approved Postcard Settlement Notice (“Notice”) to 3,090 Class  
18 Members.

19 4. As of October 10, 2023, of the 3,090 Notices mailed, 186 Notices were returned to  
20 JND as undeliverable. For the undeliverable Notices, two (2) Notices were returned with updated  
21 address information from the United States Postal Service (“USPS”) and were forwarded to the  
22 updated addresses. For the remaining undeliverable Notices, JND conducted advanced address  
23 searches and received updated address information for 96 Class Members. JND re-mailed the  
24 Notices to the updated addresses accordingly. Of the remailed Notices, five (5) were returned as  
25 undeliverable.

26 5. In total 2,997 or 97.0% of the Postcard Notices were deemed deliverable and 93 or  
27 3.0% were deemed undeliverable.

28

1 **EMAIL NOTICE CAMPAIGN**

2 6. As previously stated in my declaration dated September 11, 2023, on August 25,  
3 2023, JND commenced the email notice campaign to Class Members with email address  
4 information.

5 7. Of the 336 Email Notices sent, 331 or 98.5% were deemed delivered and five (5) or  
6 1.5% were deemed undeliverable.

7 **CASE WEBSITE**

8 8. On August 25, 2023, JND established a dedicated website for the above-captioned  
9 action (www.anicocoisettlement.com), which hosts important case documents (including, but not  
10 limited to, the Long Form Notice, Postcard Notice, Joint Stipulation and Settlement Agreement,  
11 Motion for Preliminary Approval of Class Action Settlement, Preliminary Approval Order),  
12 answers to frequently asked questions, and provides contact information for JND, the Settlement  
13 Administrator.

14 9. As of October 10, 2023, the website has tracked 208 unique visitors who registered  
15 478 page views.

16 **TOLL-FREE TELEPHONE NUMBER AND POST OFFICE BOX**

17 10. On August 25, 2023, JND activated a case-specific toll-free number (1-877-381-  
18 0370) for Class Members to call to obtain more information about the Action. The telephone line  
19 is available 24 hours a day, seven (7) days a week. JND also established a dedicated post office box  
20 for this matter where Class Members may send their exclusion requests.

21 11. As of October 10, 2023, the toll-free telephone line has received 26 calls.

22 **EXCLUSION REQUESTS**

23 12. The Notices informed recipients that Class Members can exclude themselves from  
24 the Settlement by e-mailing or mailing their exclusion requests to the Settlement Administrator. All  
25 exclusion requests must be submitted or timely postmarked by October 10, 2023.

26 13. As of October 10, 2023, JND has received two (2) exclusion requests for five (5)  
27 policies.

1 14. If JND receives any additional timely postmarked submissions by the deadline, JND  
2 will inform the parties.

3 **OBJECTIONS**

4 15. The Notices informed recipients that Class Members may object to the Settlement  
5 if they do not agree with the terms of the Proposed Settlement. In order to object to the Settlement,  
6 Class Members are required to file their objection with the Court by October 10, 2023.

7 16. As of October 10, 2023, JND has not received any objections.  
8

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

11 Executed this October 13, 2023, in Stone Harbor, NJ.

12  
13 

14 \_\_\_\_\_  
15 Gina Intrepido-Bowden  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28