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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

STEVEN ROBERT PRESCOTT,
DONOVAN MARSHALL, MARIA
CHRISTINE ANELLO, DARLENE
KITTREDGE, TREAHANNA
CLEMMONS, and SUSAN ELIZABETH
GRACIALE, individually and on behalf of
all others similarly situated,

Plaintiffs,

vs.

RECKITT BENCKISER LLC,

Defendant.

Case No. 5:20-cv-02101-BLF

**DECLARATION OF JULIE REDELL
REGARDING SETTLEMENT
ADMINISTRATION CLAIMS PROCESSING**

Hon. Beth Labson Freeman

DECLARATION OF JULIE REDELL REGARDING SETTLEMENT
ADMINISTRATION CLAIMS PROCESSING

I, Julie Redell, hereby declare and state as follows:

1. My name is Julie Redell. I have personal knowledge of the matters set forth herein,
and I believe them to be true and correct.

2. I am a Senior Director of Client Services with Epiq Class Action & Claims
Solutions, Inc. (“Epiq”), the Court-appointed Settlement Administrator in this Action.

3. The facts in this declaration are based on my personal knowledge, as well as
information provided to me by my colleagues in the ordinary course of my business at Epiq.

4. I submit this declaration to supplement the *Declaration of Cameron R. Azari, Esq.
Regarding Implementation and Adequacy Settlement Notice Plan and Notices* to provide additional
information to the Court regarding the verification of submitted claims.

5. To make the claims process as simple and streamlined as possible, and to ensure

1 Settlement Class Members had an opportunity to easily submit an online Claim Form, the claim
2 submission process (“claims portal”) on the Settlement Website was publicly available, which is
3 commonplace. In some cases, a consequence of having the claims process publicly available on
4 the Settlement Website is the possible increase in fraudulent Claim Forms being filed. For this
5 Settlement, the Claim Form required every claimant to attest to the information they provided as
6 true and correct —*i.e.*, they are a Settlement Class Member who purchased at least one bottle of
7 Woolite laundry detergent bottle with a label bearing the phrases “Color Renew” and/or “revives
8 color” that the Settlement Class Member purchased during the Class Period as a resident of
9 California, New York, or Massachusetts for personal, family, or household use and not for resale.

10 6. To prevent fraudulent claim filings, Epiq included a reCAPTCHA requirement¹ on
11 the online Claim Form and also employed real-time screening measures on the Settlement Website
12 to identify claimants who repeatedly used questionable IPs, domains, or payment destinations.
13 Despite these deterrents, Epiq identified Claim Forms submitted during the Claims Period that
14 presented one or more indicators suggesting the claims were likely fraudulent claims. To ensure
15 all Settlement Class Members were able to file a Claim Form on the Settlement Website, the claims
16 portal was available during the entire Claims Period. All potentially fraudulent Claim Forms were
17 analyzed following the end of the Claims Period.

18 7. Epiq has worked closely with Plaintiffs to aggressively flag potentially fraudulent
19 Claim Forms through a custom data analysis. For example, Epiq received dozens, hundreds, or
20 sometimes thousands of Claim Forms from the same internet location, email address, and/or
21 mailing address. Additionally, Epiq received multiple, seemingly separate Claim Forms with
22 identical payment destinations. In Epiq’s experience, multiple Claim Forms that share such
23 duplicative characteristics reasonably suggests the Claim Forms were submitted by non-class
24 members or by fraudulent means. Working closely with Plaintiffs to flag Claim Forms using

25
26 ¹ “reCAPTCHA” enables web hosts to distinguish between human and automated access to websites.

1 Epiq’s detailed fraud review criterion, Epiq determined it was reasonable to remove for further
2 review Claim Forms that had an indicium of fraud.

3 8. After flagging and removing the Claim Forms identified as fraudulent, there are
4 129,003 Claim Forms (representing 324,927 bottles claimed) without an indicium of fraud, and
5 thus appear to be eligible for payment. To ensure valid Claim Forms from Settlement Class
6 Members only are provided a payment, Epiq’s fraud detection measures will be used throughout
7 the payment process as well. Any additional Claim Forms deemed fraudulent or otherwise invalid
8 will be removed.

9 9. If the Court requires additional details regarding Epiq’s identification and
10 verification of fraudulent Claim Forms, Epiq will provide a supplemental declaration to the Court.
11 If this is required, Epiq respectfully requests to be permitted to submit additional details under seal
12 to the Court. This will prevent “bad actors” from obtaining any details regarding Epiq’s extensive
13 work to prevent, detect, and identify fraudulent claim filers.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed on
15 January 26, 2024.

16
17 *Julie Redell*

18 _____
Julie Redell

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27 DECLARATION OF JULIE REDELL REGARDING SETTLEMENT ADMINISTRATION
28 CLAIMS PROCESSING