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16 *Counsel for Plaintiffs and Classes*

17 **UNITED STATES DISTRICT COURT FOR THE**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN JOSE DIVISION**

20 STEVEN ROBERT PRESCOTT, DONOVAN
21 MARSHALL, MARIA CHRISTINE
22 ANELLO, DARLENE KITTREDGE,
23 TREAHANNA CLEMMONS, and SUSAN
24 ELIZABETH GRACIALE,
25 individually and on behalf of others similarly
26 situated,

27 Plaintiffs,

28 v.

RECKITT BENCKISER LLC,

Defendant.

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

**ADDITIONAL STATEMENT IN
SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND FOR
AWARD OF ATTORNEYS' FEES,
LITIGATION COSTS, AND SERVICE
AWARDS**

Date: March 28, 2024

Time: 9:00 AM

Judge: Hon. Beth L. Freeman

1 Plaintiffs submit this additional statement in support of Plaintiffs’ Motion for Final
2 Approval. (ECF No. 192.) Plaintiffs attach hereto the Supplemental Declaration of Cameron R.
3 Azari (“Azari Decl.”) regarding the work of Settlement Administrator Epiq Class Action & Claims
4 Solutions, Inc. (“Epiq”).

5 Epiq has determined it will incur a total of \$337,000 to provide all notice and settlement
6 administration services for the Settlement. Azari Decl. ¶ 10. This is more than Epiq’s initial
7 estimate of \$306,757 for two reasons. *Id.* ¶ 11. First, Epiq received 29% more valid claim forms
8 than anticipated (129,003 rather than 100,000), which increased “Epiq’s costs to process and
9 review the additional Claim Forms” and to “distribute payments to these additional claimants.” *Id.*
10 ¶ 11. Second, “Epiq worked aggressively to detect possible fraudulent claim filing by non-Class
11 Members, which required additional efforts by Epiq, including a custom data analysis to detect
12 and reject fraudulent Claim Forms.” *Id.*

13 The Azari Declaration also provides an update on the number of valid claims, the number
14 of Woolite bottles validly claimed, and the per-bottle payment. 129,003 Class Members submitted
15 valid claims. *Id.* ¶ 8. Epiq has updated the number of Woolite bottles validly claimed: 349,928
16 Woolite bottles have been validly claimed and are eligible for payment. *Id.* ¶ 8. Finally, Epiq has
17 calculated that Class Members will receive \$4.36 per Woolite bottle validly claimed (in the first
18 distribution). *Id.*

19 Plaintiffs also submit a Modified Proposed Order that asks the Court to approve Class
20 Counsel’s request that Epiq be paid \$337,000 from the Settlement Fund for Epiq’s work as the
21 Settlement Administrator. *See* Modified Proposed Order ¶ 9. The Modified Proposed Order is
22 otherwise identical to the Proposed Order submitted with Plaintiffs’ Motion for the Final Approval.

23
24 DATED: February 16, 2024

Respectfully submitted,

25
26 By: /s/ Eric Kafka

27 Eric Kafka (admitted *pro hac vice*)
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