

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI**

TIFFANY RAYBURN and MARQUITA
PATTERSON, individually, and on behalf of all
others similarly situated,

Case No.: 2522-CC00257

Plaintiffs,

v.

MERS MISSOURI GOODWILL
INDUSTRIES,

Defendant.

**DECLARATION OF JESSIE T. MONTAGUE REGARDING
SETTLEMENT ADMINISTRATION**

1. My name is Jessie T. Montague, and I am over the age of 18 years. I make this declaration under the penalty of perjury, free and voluntarily, under no coercion, threat, or intimidation, and without promise of benefit or reward, based on my own personal knowledge. If called to testify, I could and would testify consistent with the matters stated herein.

INTRODUCTION

2. I am a Senior Project Manager for RG/2 Claims Administration LLC (“RG/2 Claims”), whose address is 30 South 17th Street, Philadelphia, PA 19103. RG/2 Claims is the independent third-party Settlement Administrator¹ appointed by the Court to handle the settlement administration activities in the above-referenced matter, including, but not limited to, assisting and in the development and administration of the notice plan, as set forth in detail in this declaration, and administering the claims process set forth in detail in the Settlement Agreement. This Declaration is based upon my personal knowledge and upon information provided to me by Class

¹ All capitalized terms herein have the same meaning as the terms defined in the Class Action Settlement Agreement and Release (“Settlement Agreement”).

Counsel or MERS Missouri Goodwill Industries' Counsel, my associates, and RG/2 Claims staff members.

3. RG/2 Claims is a full-service class action settlement administrator offering notice, claims processing, allocation, distribution, tax reporting, and class action settlement consulting services. RG/2 Claims' experience includes the provision of notice and administration services for settlements arising from antitrust, data security breach, consumer, civil rights, employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 Claims has administered and distributed in excess of \$2 billion in class action settlement proceeds.

4. I have been actively involved and responsible for handling the administration of the settlement of the above-referenced matter.

5. RG/2 Claims was retained to, among other tasks, a) prepare, print, mail and email notices to Settlement Class Members; b) create and maintain the Settlement Website; c) prepare weekly activity reports; d) handle inquiries from Settlement Class Members; e) re-mail Notices; f) skip-trace undeliverable addresses; g) receive and process Claim Forms; h) receive and track Opt-Outs and Objections; i) review supporting documentation; j) calculate and issue Settlement Benefits to Settlement Class Members with Valid Claims; and k) conduct such other tasks as the Parties mutually agree or the Court orders RG/2 Claims to perform.

NOTICE DISSEMINATION

6. On or about March 26, 2025, RG/2 Claims received from Defendant's Counsel electronic files containing the names and known mailing addresses, and email addresses for the 70,676 individuals identified as Class Members. RG/2 Claims reviewed the electronic file and determined there were 70,244 unique Settlement Class Members with valid contact information.

7. On April 7, 2025, RG/2 Claims emailed the Short Form Notice to the 6,376 Class

Members. Of the Short Form Notices sent by email, 2,050 Notices could not be delivered via email. RG/2 Claims promptly mailed a Short Form Notice to the Class Members with undeliverable email notices or invalid email addresses.

8. On April 7, 2025, RG/2 Claims caused to be served by First Class U.S. Mail the Short Form Notice to 63,868 individuals identified as Settlement Class Members without a valid email address. A true and correct copy of the Short Form Notice is attached hereto as “**Exhibit A**”.

9. Prior to mailing the Short Form Notice, and in order to provide the best notice practicable and locate the most recent addresses for Settlement Class Members, RG/2 Claims processed the list of 70,244 Settlement Class Members names and addresses through the United States Postal Service’s (“USPS”) National Change of Address database (“NCOA”) and updated the data with corrected information.

10. As of June 19, 2025, the USPS returned 18,833 Summary Notices as undeliverable. Of the Summary Notice returned, 176 included a forwarding address provided by the USPS, and RG/2 Claims promptly mailed a new Summary Notice to those Class Members. For the remaining 18,657 Notices, RG/2 Claims performed extensive skip-trace procedures and was able to locate updated addresses for 13,975 Class Members. A total of 4,682 Summary Notices remain undeliverable after skip-trace procedures. Thus, less than 7% of the Summary Notices sent have been deemed unsuccessfully delivered.

SETTLEMENT WEBSITE

11. On or about April 4, 2025, RG/2 Claims made available the Settlement Website at www.MERSMOGoodwillSettlement.com. The website includes the following:

- a. The “Homepage” contains a summary of the Settlement and advises the

Settlement Class Members of their rights under the Settlement. A copy of the Homepage is attached hereto as “**Exhibit B.**”

- b. The “Court Documents” page contains pdf copies of the Class Action Petition, Settlement Agreement and Release, Order Granting Plaintiffs Motion for Preliminary Approval, Motion for Attorneys’ Fees, Litigation Expenses, and Service Award, and Declaration of Counsel in Support of the Motion for Attorneys’ Fees, Litigation Expenses, and Service Award.
- c. The “Notice and Claim Form” page contains pdf copies of the Long Form Notice, Claim Form and a link to the online claim filing portal for Settlement Class Members to log in using a Notice ID and Pin to submit the claim electronically.
- d. The “File a Claim” page includes a link to a secure portal where Settlement Class Members can log in using a Notice ID and Pin to submit the claim electronically.
- e. The “Contact Us” page contains the contact information of the Settlement Administrator and Class Counsel.
- f. As of June 19, 2025, the settlement website was viewed a total of 45,419 times by 43,407 unique users.

TOLL-FREE NUMBER

12. RG/2 made available and hosted a toll-free number 800-339-7431 to allow Settlement Class Members to learn more about the settlement and request to have a Long-Form Notice and Claim Form mailed directly to them. The toll-free number was displayed in the Long-Form Notice, Short Form Notice and on the Settlement Website. As of June 19, 2025, RG/2 Claims has received 825 calls and 178 requests to have a Long-Form Notice and Claim Form mailed.

SETTLEMENT P.O. BOX

13. RG/2 made available and monitored a settlement mailbox, Post Office Box 59479 in Philadelphia, PA 19102-9479 where Settlement Class Members could – and may still – submit hard copy Claim Forms, requests for Claim Forms, Opt-Out requests, objections, and other case correspondence.

SETTLEMENT EMAIL INBOX

14. RG/2 established and monitored a settlement inbox, MERSMOGoodwill@rg2claims.com, where Settlement Class Member could – and may still – learn more about the settlement, ask questions about the Settlement and request to have a Long Form Notice and Claim Form mailed directly to them and submit a Claim Form. As of June 19, 2025, RG/2 has received 382 emails.

OPT-OUTS & OBJECTIONS

15. The Opt-Out Period for this Settlement ended on June 6, 2025. RG/2 Claims has received two (2) valid Requests for Exclusion. Attached hereto as “**Exhibit C**” are the names of the individuals who submitted exclusion requests.

16. The Objection Deadline for this Settlement was June 6, 2025. To date, RG/2 has not received or been notified of any objections to the settlement.

CLAIMS PROCESSING

17. To date, RG/2 has received and processed 1,607 Claim Forms resulting in a 2.27% claims rate. Of the claims submitted, 154 claims were submitted by individuals who are not Settlement Class Members. The deadline to submit a Claim Form to receive settlement benefits is 90 days after the Notice Date or, July 7, 2025. The claims rate is likely to increase with 13 days left in the Claims Period. As the deadline to file a claim has not yet passed, the information

provided regarding claims submission is subject to change and is not final.

SETTLEMENT ADMINISTRATION

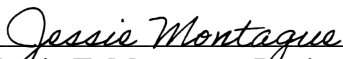
18. RG/2 Claims has incurred fees and costs associated with the Settlement Administration thus far and will incur additional costs for resolving the deficiencies, distribution, calculating payments, and responding to Settlement Class Member inquiries. RG/2 anticipates that the total cost for its services through completion of the case will be \$102,980. The estimated cost through completion of the case includes the costs associated with purchasing Credit Monitoring Services for Settlement Class Members who requested two years of three-bureau credit monitoring with at least \$1,000,000 in identity theft protection insurance.

CONCLUSION

19. Based on the total returned Notices to date and the number of remailed notices, RG/2 Claims believes the Notice Program reached 93% of Class Members. This reach is consistent with or better than other effective court-approved settlement notice programs and is designed to meet due process requirements. The FJC's Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide (the "FJC Checklist") considers 70-95% reach among class members to be a "high percentage" and reasonable.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND CORRECT.

Executed on June 24, 2025, at Philadelphia, PA.



Jessie T. Montague, Declarant