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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF LOS ANGELES**

12 ROY LO,  
13 Individually and On Behalf of  
Others Similarly Situated

14 Plaintiff,

15 v.

16 NUTRIBULLET, LLC,

17 Defendant.

Case No. 21STCV12852

**CLASS AND REPRESENTATIVE ACTION**

**DECLARATION OF JACOB KAMENIR  
ON BEHALF OF SIMPLURIS, INC.  
(PROPOSED SETTLEMENT  
ADMINISTRATOR)**

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## DECLARATION OF JACOB KAMENIR

I, Jacob Kamenir, declare as follows:

1. I am the Director of Business Development for Simpluris Inc., (“Simpluris”). I am over 18 years of age and authorized to make this declaration on behalf of Simpluris and myself, and make this declaration based upon my own personal knowledge.

2. Simpluris has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance, and consumer cases. Simpluris specializes in pre-settlement consultation, data management, legal notification, call center support, claims processing and tax reporting.

3. Simpluris has provided notification and claims administration services in more than 6,000 cases. Over the past 15 years, Simpluris has handled over \$5 billion in settlement distributions. A true and correct copy of Simpluris’ company resume (“Simpluris Resume”) is attached as Exhibit A.

4. Simpluris is committed to comprehensive data security, and has never experienced a data breach. A true and correct copy of our SOC 2 Certification demonstrating our commitment to security is part of Exhibit A. Additionally, Simpluris maintains insurance coverage in the amount of \$3,000,000 for Errors and Omissions.

5. Simpluris does not have any affiliation with counsel for this matter.

6. Simpluris has been selected by counsel to serve as the proposed class action Settlement Administrator for this case. In this capacity, Simpluris will be charged with, among other responsibilities, creating and executing a notice program consisting of direct outreach to known customers via email, digital advertising, and a detailed notice on a settlement website; and administer the Settlement.

7. Simpluris has estimated the cost of administering the settlement in this case to be \$63,175; this is an adjustment of \$990 from the original estimate of \$62,185 from August 12, 2021, due to increased media and notice costs that were not fully offset by the elimination of claims processing.

1 Should there be a significant increase or decrease in the scope of work, Simpluris will inform the parties.

2 8. Simpluris will provide the detailed estimate to the Court for review upon request.

3 9. Simpluris understands that notice and administration expenses may not be approved by  
4 the Court until the final approval hearing.

5 I declare under penalty of perjury under the laws of the State of California that the above is true  
6 and correct and that this Declaration was executed this 28th day of June, 2022, in Albert Lea,  
7 Minnesota.

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12 Jacob Kamenir