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11	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
12	COUNTY OF	TULARE
13	DAVID UNDERWOOD and DUNCAN MEADOWS,	
14	individually and on behalf of all others similarly	C N VCH207007
15	situated,	Case No. VCU307987
16	Plaintiffs,	DECLARATION OF RYAN ALDRIDGE REGARDING PROPOSED NOTICE
17	v.	PLAN AND ADMINISTRATION
18	HAPY BEAR SURGERY CENTER, LLC	
19	Defendant.	
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I, Ryan Aldridge, hereby declare and state as follows:

- 1. I am a Project Manager for the proposed Settlement Administrator, Eisner Advisory Group, LLC ("EAG" or "EisnerAmper"), a full-service administration firm providing legal administration services, including the design, development, and implementation of unbiased complex legal notification programs. We were asked by Counsel to review and execute the proposed Notice Plan in the above-referenced matter (the "Action")¹. The following statements are based on my personal knowledge as well as information provided by other experienced employees working under my supervision.
- 2. We have undertaken the creation and execution of notice plans, along with the administration of diverse class action and mass action settlements. Our expertise extends across a wide array of subject matters, encompassing but not limited to privacy, products liability, consumer rights, mass tort, antitrust, insurance, and healthcare. The accomplished members of our team possess extensive experience in the design and implementation of notice procedures involving various aspects of class certification and settlement programs.

OVERVIEW

3. Based on our review of the Settlement Agreement, the Settlement Class is defined as follows:

Nationwide Class: All persons whose personal identification information and data was stored in HBSC's systems at the time of the December 27, 2023 cybersecurity incident and who were impacted by the cybersecurity incident. HBSC has confirmed that the number of Class Members impacted by the December 27, 2023 cybersecurity incident is 109,161 individuals.

California Subclass: All members of the Nationwide Class who are also California residents at the time of the December 27, 2023 cybersecurity incident. HBSC has confirmed that the number of California residents at the time of the cybersecurity incident is 108,946 individuals.

Excluded from the Settlement Class are HBSC's officers, directors, and employees; any entity in which HBSC has a controlling interest; and the affiliates, legal representatives, attorneys, successors, heirs, and assigns of HBSC. Excluded also from the Settlement Class are members of the judiciary to whom this case is assigned, their families and members of their staff. Also excluded from the Settlement Class are non-natural persons.

¹ All capitalized terms not otherwise defined in this document shall have the meaning ascribed to them in the Settlement Agreement.

1. This Declaration will describe the Notice Plan ("Notice Plan") proposed in this Action, which includes direct notice and has been designed using methods accepted by the courts.

PROPOSED NOTICE PLAN

- 4. Class Counsel has informed us that the estimated total size of the Settlement Class is approximately 109,161 individuals, including an estimated 108,946 individuals in the California Subclass. In order to obtain the pertinent contact details of Class Members, it has been communicated that upon preliminary approval of the Settlement Agreement, Defendant will furnish a list of all records comprising, to the extent available, the names and physical mailing addresses for each Settlement Class Member (the "Class Notice List"), which will facilitate the implementation of notice via U.S. mail.
- 5. The proposed Notice Plan provides individual mailed notice be sent to all Class Members identified in the Class Notice List.

Direct Mail Notice

6. The Short Form Notice will be mailed (the "Postcard Notice") via United States Postal Service ("USPS") First Class Mail to the Settlement Class identified in the Class Notice List. Prior to mailing, all mailing addresses will be checked against the National Change of Address (NCOA) database maintained by USPS to ensure the accuracy and currency of Class Member address information for proper formatting and mail delivery.² Additionally, the addresses will be validated through the Coding Accuracy Support System (CASS) to uphold zip code precision, while Delivery Point Validation (DPV) will be employed to verify address accuracy. In the event that NCOA provides a more current mailing address for a Class Member, we will update the address accordingly. In instances where a Postcard Notice is returned with forwarding address information, we will re-send to the newly provided address. For any Postcard Notices that are returned as undeliverable, we will utilize standard skip-tracing techniques to obtain forwarding address information. If skip-tracing yields an alternative forwarding mailing address, we will re-mail the notice to the address identified through the skip-tracing process.

² The NCOA database is maintained by the USPS and consists of approx. 160 million permanent change-of-address (COA) records consisting of names and addresses of individuals, families, and businesses who have filed a change-of-address with the Postal ServiceTM. The address information is maintained on the database for 48 months.

Settlement Website

7. We will create and maintain a website, www.HBSCDataSecurityIncident.com, dedicated to this Settlement. The website address will be prominently included in the Short and Long Notice (collectively, the "Notices"). The Notices, along with other relevant documents such as the Preliminary Approval Order, the Settlement Agreement, and Claim Form, will be posted on the Settlement Website for Class Members to review and download. The Settlement Website will also allow Class Members to file a claim electronically, and include relevant dates, other case-related information, instructions for how to be excluded from the Class or object to the Settlement and contact information for the Settlement Administrator.

Dedicated Toll-Free Hotline

8. A dedicated toll-free informational hotline will be available 24 hours per day, seven days per week. The hotline will utilize an interactive voice response ("IVR") system where Class Members can obtain essential information regarding the Settlement and be provided responses to frequently asked questions. Class Members will also have the option to leave a voicemail and receive a call back from the Claims Administrator.

Requests for Exclusion

9. Class Members that want to exclude themselves from the Class may submit a request for exclusion by mail to a dedicated Post Office Box that we will maintain. We will monitor all mail delivered to that Post Office Box and will track all exclusion requests received, which will be provided to the Parties.

CONCLUSION

- 10. The proposed Notice Plan encompasses individualized direct notice to all members of the Class who can be identified through reasonable efforts.
- 11. It is my opinion, based on my experience, as well as the expertise of my team, that this method of focused notice dissemination provides effective notice in this Action, will provide the best notice that is practicable, adheres to Cal. R. 3.769(f) and Fed. R. Civ. P. 23, follows the guidance set forth in the Manual for Complex Litigation 4th Ed. and FJC guidance, and exceeds the requirements of due process, including its "desire to actually inform" requirement.³

³ Mullane v. Cent. Hanover Bank & Trust Co., 339 U.S. 306, 315 (1950)

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2	I, Ryan Aldridge, declare under the penalty of perjury that the foregoing is true and correct. Executed
3	on this 22 nd day of August, 2024, in Baton Rouge, Louisiana.
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	Russ Mila
6 7	Ryan Aldridge
8	Ryan Aldridge
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