

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

GAYL JACKSON, MICHELLE EBNER, and  
DENISE TURNER

**Case No. 8:18-cv-02356-PJM**

Individually and on behalf of all others  
similarly situated,

Plaintiffs

v.

VIKING GROUP, INC., et al.

Defendants.

**DECLARATION OF STEPHANIE J. FIERECK, ESQ. ON IMPLEMENTATION OF  
CAFA NOTICE**

I, STEPHANIE J. FIERECK, ESQ., hereby declare and state as follows:

1. My name is Stephanie J. Fiereck, Esq. I am over the age of 21 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Legal Notice Manager for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans.

3. Epiq is a firm with more than 20 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service, claims database management, claim adjudication, funds management and distribution services.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

**DECLARATION OF STEPHANIE J. FIERECK, ESQ. ON IMPLEMENTATION OF CAFA NOTICE**

**CAFA NOTICE IMPLEMENTATION**

5. At the direction of counsel for the Defendants Viking Group, Inc., The Viking Corporation, and Supply Network, Inc., d/b/a Viking Supplynet, 57 officials, which included the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia and the United States Territories were identified to receive the CAFA notice.

6. Epiq maintains a list of these state and federal officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq's list were verified, then run through the Coding Accuracy Support System ("CASS") maintained by the United States Postal Service ("USPS").<sup>1</sup>

7. On November 22, 2019, Epiq sent 57 CAFA Notice Packages ("Notice"). The Notice was mailed by certified mail to 56 officials, including the Attorneys General of each of the 50 states, the District of Columbia and the United States Territories. The Notice was also sent by United Parcel Service ("UPS") to the Attorney General of the United States. The CAFA Notice Service List (USPS Certified Mail and UPS) is included hereto as **Attachment 1**.

8. The materials sent to the Attorneys General included a cover letter, which provided notice of the proposed settlement of the above-captioned case. The cover letter is included hereto as **Attachment 2**.

9. The cover letter was accompanied by a CD, which included the following:

- a. Class Action Complaint and First Amended Class Action Complaint;

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<sup>1</sup> CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier route codes that appear on mail pieces.

b. Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Plaintiffs' Memorandum of Law in Support of Their Motion for Preliminary Approval of Class Action Settlement;

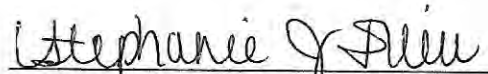
c. Declaration of James P. Ulwick in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (with exhibits):

- Exhibit A – Settlement Agreement (with exhibits):
  - Exhibit A-1 – Claim Form;
  - Exhibit A-2 – [Proposed] Notice of Class Action Settlement;
  - Exhibit A-3 – [Proposed] Preliminary Approval Order;
  - Exhibit A-4 – Notice of Deficient Claim Form;
  - Exhibit A-5 – [Proposed] Denial of Claim Notice;
  - Exhibit A-6 – [Proposed] Short Form Notice;
  - Exhibit A-7 – Press Release; and
  - Exhibit A-8 – [Proposed] Letter to Installers;
- Exhibit B – Firm Resumes of Kramon & Graham and Sauder Schelkopf;

d. Declaration of Cameron R. Azari, Esq., on Settlement Notices and Notice Plan; and

e. Geographic Distribution of Class Members and Proportionate Share of Claims - a table that provides the estimated geographic distribution of the sprinklers included in the Settlement as well as the proportionate share of sprinklers sold into each state.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 21, 2020.

  
Stephanie J. Fiereck, Esq.