

1 Carney R. Shegerian, State Bar No. 150461
2 CShegerian@Shegerianlaw.com
3 Anthony Nguyen, State Bar No. 259154
4 ANguyen@Shegerianlaw.com
5 **SHEGERIAN & ASSOCIATES, INC.**
6 11520 San Vicente Boulevard
7 Los Angeles, California 90049
8 Telephone Number: (310) 860-0770
9 Facsimile Number: (310) 860-0771

10 Attorneys for Plaintiff ARTHUR
11 BAGDASARYAN, individually, and on
12 behalf of all others similarly situated

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

15 ARTHUR BAGDASARYAN, on behalf of
16 himself and all others similarly situated,

17 Plaintiffs,

18 v.

19 WOODBURY UNIVERSITY, a California
20 corporation; and DOES 1 through 100
21 inclusive,

22 Defendants.

Case No.: 20STCV25666

*[Assigned for all purposes to the Hon.
Lawrence P. Riff in Dept. SS7]*

**DECLARATION OF WILLIAM W.
WICKERSHAM IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL**

Date: May 15, 2024

Time: 9:00 a.m.

Dept.: SS7

Complaint Filed: July 6, 2020

FAC Filed: March 22, 2021

Trial Date: None Set

23 ///

24 ///

25 ///

1 I, WILLIAM W. WICKERSHAM, declare as follows:

2 1. I am Senior Vice President of Business Development and Client Relations for RG/2
3 Claims Administration LLC ("RG/2 Claims"), whose address is 30 South 17th Street, Philadelphia,
4 PA 19103. I am over the age of 18, have personal knowledge of the matters set forth herein, and if
5 called upon to do so, could testify competently to them. I submit this declaration in connection with
6 Motion for Preliminary Approval of Class Action Settlement.

7 2. RG/2 Claims is a full-service class action settlement administrator offering notice,
8 claims processing, allocation, distribution, tax reporting, and class action settlement consulting
9 services. RG/2 Claims' experience includes the provision of notice and administration services for
10 settlements arising from antitrust, consumer fraud, civil rights, employment, negligent disclosure, and
11 securities fraud allegations. Since 2000, RG/2 Claims has administered and distributed in excess of
12 \$1.7 billion in class action settlement proceeds. A copy of RG/2 Claims' firm background and
13 capabilities is attached hereto as Exhibit A.

14 3. RG/2 Claims was retained by Class Counsel, subject to Court approval, to provide
15 settlement administration services in connection with the proposed class notice in the above-
16 referenced matter. At the request of Class Counsel, I am providing this declaration to provide the
17 Court information about the procedures and policies RG/2 Claims has in place to handle the notice
18 administration process for this matter.

19 4. I have been informed that the Class consists of all undergraduate and graduate students
20 who paid or were obligated to pay tuition, fees, or others costs to attend in-person classes at either
21 Woodbury University campus (i.e., either the Burbank, California campus or San Diego, California
22 campus), excluding both (a) students that did not pay any tuition or fees (other than parking fees) and
23 (b) faculty members, staff, and their respective dependents, for the Class Period.

24 5. I, and in consultation with counsel in the present litigation, designed the Notice Plan
25 in the above- captioned action ("Notice Plan"). This Declaration described the constitute parts of the
26 Notice Plan and how the Notice Plan is designed to effectively reach the Class. The Notice Plan
27 developed by RG/2 Claims to reach the Class is consistent with other effective court-approved notice
28 programs, and the Federal Judicial Center's (FJC) Judges' Class Action Notice and Claims Process

1 Checklist and Plain Language guide.

2 6. We have designed the Notice Plan that includes the following elements:

3 (a) Direct E-mailed Notice;

4 (b) Mailed Postcard Notice for any Class Member without a viable e-mail address;

5 (c) A dedicated case website through which Class Members can obtain detailed
6 information about the pending litigation and access the Class Notice and case documents; and

7 (d) A toll-free telephone number by which Class Members can obtain additional
8 information about the litigation and review a copy of the Class Notice.

9 **DIRECT NOTICE**

10 7. RG/2 Claims will give the Notice of Pendency of Class Action ("Class Notice")
11 prepared by the parties and approved by the Court. RG/2 Claims expects to receive text for the Class
12 Notice from Counsel shortly after preliminary approval of the Settlement is granted.

13 8. Based upon information provided by Class Counsel, Defendant has e-mail and/or
14 mailing addresses of the Class, which consists of approximately 1,160 members.

15 9. RG/2 Claims will transmit an electronic version of the Class Notice to the Class
16 Members for whom Defendants have e-mail contact information. RG/2 Claims will follow standard
17 e-mail best practices to increase deliverability and bypass junk and SPAM filters, including through
18 use of "unsubscribe" links and RG/2 Claims' contact information.

19 10. After disseminating e-mail notice, RG/2 Claims will track e-mail delivery attempts. If
20 an item is returned as undeliverable (commonly referred to as a "bounce"), a reason is provided. If
21 the return indicates that the e-mail address does not exist as attempted (commonly referred to as a
22 "hard bounce") no additional attempts to deliver the e-mail will be made. If the returned e-mail
23 indicates that the target inbox is full, that delivery has been blocked or deferred by the internet service
24 provider, or that any other circumstances prevent delivery (commonly referred to as a "soft" bounce),
25 RG/2 Claims will attempt to re-send the e-mail for a period of 72 hours. If the e-mail still cannot be
26 delivered after the 72-hour period, it will be deemed undeliverable and no additional e-mail delivery
27 attempts will be made.

11. For Class Members whose e-mail Class Notice is undeliverable, RG/2 Claims will mail by USPS First Class Mail the Class Notice. Prior to the mailing of the Class Notice, RG/2 Claims will process and update the mailing addresses for the Class Members through the USPS National Change of Address Database (“NCOA”) to capture any updated addresses for the Class Members. In the event that any individual has filed a U.S. Postal Service change of address request, the address listed with the NCOA will be utilized in connection with the mailing of the Class Notice.

12. For any Notices returned as undeliverable, RG/2 Claims will perform skip-tracing to identify a more current viable mailing address. In the event an updated address is obtained, RG/2 Claims will promptly re-mail the Class Notice to those Class Members via First Class Mail. For Class Notice documents that are returned by the Post Office with forwarding addresses attached, RG/2 Claims will promptly re-mail these Class Notice to those Class Members at the forwarding address via First Class mail.

13. The combination of direct e-mail noticed and mailed notices should reach at least 90 percent of the Class.

CASE WEBSITE

14. Prior to the launch of the Notice Plan, RG/2 Claims will establish a case website for the purposes of acting as a repository for the Class Notice and other pertinent information about the case and associated Court Orders and pleadings.

15. RG/2 Claims will work with the counsel to update the case website to finalize the content for the website. The website will provide Class Members with general information about the case, answers to frequently asked questions, important dates and deadline information, a collection of downloadable Court documents related to the litigation (including the Class Notice, the operative complaint, and the Settlement Agreement), and the contact information for the Settlement Administrator.


TOLL-FREE HELPLINE

16. Prior to the launch of the Notice campaign, RG/2 Claims will make available a toll-free number to assist potential Class Members and any other persons seeking information about the

1 litigation and to address any questions about the case. The helpline will include an Interactive Voice
2 Response solution which will include automated responses to frequently asked questions.

3
4 I declare under the penalty of perjury under the laws of California and the United States that
5 the foregoing is true and correct.

6 Executed on May 6, 2024

7 

8
9 _____
10 William W. Wickersham
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



SETTING A NEW STANDARD IN CLASS ACTION CLAIMS ADMINISTRATION

PHILADELPHIA • NEW YORK • ATLANTA • SAN DIEGO • SAN FRANCISCO

TABLE OF CONTENTS

4 Class Action Experience

5 Cutting-Edge Technology and Skilled Resources

7 Full Life-Cycle Support for Your Class Action

8 Range of Services

Class Action Experience

High-Quality Service at Competitive Rates

RG/2 Claims seasoned professionals utilize their vast class action experience, tax and financial management resources to deliver high-quality service at competitive rates.

RG/2 Claims is a boutique class action claims administration firm with a nationwide presence founded by seasoned class action practitioners and highly credentialed tax professionals. Our leadership team has a collective 100 years' experience working in the field of class action litigation and settlement administration to leverage for the benefit of counsel. Our team of driven class action attorneys, *highly credentialed CPAs and forensic accountants* approach each matter with a personal goal to shepherd the settlement through the process from settlement negotiations through final approval. Our personal attention and care ensures that the administration is handled in a seamless matter that allows counsel to proceed with the knowledge and confidence that their settlement will receive the attention and care that they demand. In addition, our operations and IT personnel bring individualized innovations to each engagement, driving the notice and settlement administration to conclusion. We have the experience to handle large settlements with the personal attention and care expected from a boutique firm.

RG/2 Claims recognizes that cutting-edge technology is the key to efficient and reliable claim processing. Our IT Group, including an experienced web design team, enables RG/2 Claims to employ technologies used to enhance accuracy, efficiency and interaction of all participants in the claims process. Our approach focuses on analysis of case needs, development of solutions to maximize resources and reduce costs through accurate and efficient data collection and entry, and ongoing maintenance and support. Throughout the entire claims process, our goal is to (1) optimize completeness, accuracy and efficiency of the data management system, including online integration; (2) validate critical fields and data; and (3) track opt-outs and claimant responses. RG/2 Claims' proprietary database application provides a *single source for managing the entire claims administration process and expediting decision making and resource management*. From the initial mailing through distribution of settlement funds and reconciliation of distributed payments, RG/2 Claims' CLEVerPay® system centralizes data, facilitating information sharing and efficient communication.



Cutting-Edge Technology and Skilled Resources

The CLEVerPay® System: A proprietary and revolutionary application developed exclusively by RG/2 Claims.

At RG/2 Claims, we developed a proprietary and customizable database with the goal of providing single-source management throughout the claims administration process, expediting decision making and resource management.

From the initial mailing through distribution of settlement funds and reconciliation of payments, RG/2 Claims' CLEVerPay® system centralizes the entire process while providing information sharing and communications solutions.

Our CLEVerPay® system is a robust and user-friendly resource that can be easily customized to meet your administration and distribution needs. We recognize how essential it is for data to be clean, centralized and readily accessible. RG/2 Claims' CLEVerPay® system has the capacity to assimilate and analyze large amounts of raw data from multiple inputs, to convert that raw data into useful information and to distribute the useful information in a variety of formats.

The integration of these elements results in timely and accurate distribution of secure payments generated from RG/2 Claims' single-source CLEVerPay® system.

For more information, please visit our website to download our CLEVerPay® System Datasheet at: <http://www.rg2claims.com/pdf/cleverPayDatasheet.pdf>.

Locations



PHILADELPHIA

30 South 17th Street • Philadelphia, PA 19103-4196
P 215.979.1620 • F 215.979.1695

NEW YORK

1540 Broadway • New York, NY 10036-4086
P 212.471.4777 • F 212.692.1020

ATLANTA

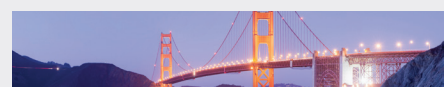
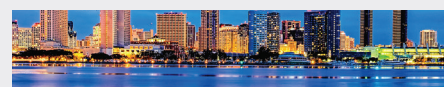
1075 Peachtree Street NE, Suite 2000 • Atlanta, GA 30309-3929
P 404.253.6904 • F 404.253.6905

SAN DIEGO

750 B Street, Suite 2900 • San Diego, CA 92101-4681

SAN FRANCISCO

Spear Tower • One Market Plaza, Suite 2200 • San Francisco, CA 94105-1127
P 415.957.3011 • F 415.957.3090



Full Life-Cycle Support for Your Class Action With You Every Step of the Way

Whether engaged as a court-appointed settlement administrator, claims agent or disbursing agent, RG/2 Claims offers a complete range of claims, settlement administration and investment management services, including but not limited to:

PROFESSIONAL CASE MANAGEMENT CONSULTING

RG/2 Claims provides custom pre-settlement consultation and highly personalized attention throughout the life cycle of settlement administration. Each retention begins with an in-depth consultation concerning the specific needs of the case. Our professionals routinely and proactively identify administrative concerns and identify and propose solutions that avoid delay and remove unpredictability from the equation. We work through a coordinated approach involving a core of specialists that are intimately familiar with the case entrusted to our care. Our retentions result in effective and efficient solutions and greater peace of mind for busy lawyers.

NOTIFICATION PLANNING AND CAMPAIGNS

Whether routine or innovative, RG/2 Claims designs cost-effective and thorough notification plans that will suit your budget whether the settlement is national in scope or highly localized. RG/2 Claims guides you through the array of notice publication options at your disposal in a variety of media formats.

WEBSITE DESIGN

RG/2 Claims can assist in the design and hosting of a website specific to the client's needs to allow for document posting, as well as pertinent information and deadlines about the case. RG/2 Claims can also provide various options for claims filing, which includes an online portal that allows claimants to submit their claims and supporting documentation through the website.

CLAIMS PROCESSING

RG/2 Claims utilizes a proprietary and customizable database that provides a single-source management tool throughout the claims administration process, expediting decision making and resource management. RG/2 Claims' proprietary and sophisticated CLEVerPay® system centralizes the entire process while providing information sharing and communications solutions, from the initial mailing through distribution of settlement funds and reconciliation of payments.

DISTRIBUTION AND TAX SERVICES

RG/2 Claims' in-house tax, accounting and financial services professionals provide disbursement services, including management of checking, sweep, escrow and related cash accounts, as well as non-cash assets, such as credits, gift cards, warrants and stock certificates. RG/2 Claims' in-house CPAs provide a broad array of accounting services, including securing private letter rulings from the IRS regarding the tax reporting consequences of settlement payments, the preparation of settlement fund tax returns and the preparation and issuance of IRS Forms 1099 and W-2.

Range of Services

Offering Unparalleled Value

RG/2 offers a range of quality value-added services for your class action administration.

SECURITIES

RG/2 Claims' highly experienced team uses its various resources to locate beneficial holders of securities, including working with the Depository Trust Company and a proprietary list of nominee firms to identify and mail notices to the class. With RG/2 Claims' CLEVerPay system, claims are processed efficiently and accurately using our proprietary damage grid that calculates class member damages in accordance with a broad array of complex plans of allocation. Claims are automatically flagged through a validation process so RG/2 Claims can communicate with class members concerning their claims and can assist them in filing claims that are complete and properly documented. Once ready for distribution, RG/2 Claims conducts an audit of the claims to insure against calculation errors and possible fraudulent claims. Once the audit is completed, RG/2 Claims calculates distribution amounts for eligible class members in accordance with the plan of allocation and issues checks and any applicable tax documents. RG/2 Claims is also often called upon to act as the Escrow Agent for the Settlement Fund, investing the funds and filing all required tax returns.

ANTITRUST

Because of the high-dollar settlements involved in most antitrust cases and potential large recoveries on behalf of class members, RG/2 Claims understands the importance of accuracy and attention to detail for these cases. RG/2 Claims works with counsel to arrive at the best possible plan to provide notice to the class. With RG/2 Claims' CLEVerPay system, claims filed with a large volume of data, which is common in an antitrust case, can be quickly and easily uploaded into our database for proper auditing. Our highly-trained staff consults with counsel to apply an audit plan to process claims in an efficient manner while ensuring that all claims meet class guidelines. Once ready for distribution, RG/2 Claims calculates check amounts for eligible class members in accordance with the plan of allocation and will issue checks (including wire transfers for large distributions) as well as any necessary tax documents. RG/2 Claims is also available to act as the Escrow Agent for the Settlement Fund, investing the funds and filing all required tax returns.

EMPLOYMENT

With an experienced team of attorneys, CPAs, damage experts and settlement administrators, RG/2 Claims handles all aspects of complex employment settlements, including collective actions, FLSA, gender discrimination, wage-and-hour and, in particular, California state court class and PAGA settlements. RG/2 Claims utilizes technological solutions to securely receive and store class data, parse data for applicable employment information, personalize consents forms or claim forms, collect consents or claims electronically, calculate settlement amounts and make payments through our proprietary CLEVerPay system. Our proprietary database also allows for up-to-the-minute statistical reporting for returned mail, consents or claims received and exclusions submitted. Our CPAs concentrate on withholding and payroll issues and IRC section 468(B) compliance and reporting. Customizable case-specific websites allow for online notification and claims filing capabilities. With Spanish/English bilingual call center representatives on-staff, class members are provided immediate attention to their needs.

CONSUMER

RG/2 Claims handles a wide range of complex consumer matters with notice dissemination to millions of class members and with settlements involving cash, coupons, credits and gift cards. Our experienced claims administrators are available to provide guidance on media, notice and distribution plans that are compliant with the Class Action Fairness Act and the state federal rules governing notice, and that are most beneficial to the class. Our proprietary CLEVerPay system provides a secure and efficient way to track class member data, claims and payments. Integrated with our database, we can provide a user-friendly claims filing portal that will allow class members to complete a static claim form or log-in using user-specific credentials to view and submit a claim personalized just for that user. A similar online portal can be provided as a highly cost-effective method for distribution where the class member can log in to obtain coupons, vouchers or credits as their settlement award.

Effective administration requires proactive planning and precise execution. Before we undertake any matter, we work with you to develop a specific plan for the administration of your case. The service plan is comprehensive, complete and tailored to your specific needs.

RG/2 CLAIMS PROVIDES THE SERVICES SUMMARIZED BELOW:

- Technical consultation during formulation of settlement agreement, including data collection criteria and tax consequences
- Design and development of notice and administration plan, including claim form design and layout
- Claim form and notice printing and mailing services
- Dedicated claimant email address with monitoring and reply service
- Calculation and allocation of class member payments
- Claim form follow-up, including issuing notices to deficient and rejected claims
- Mail forwarding
- Claimant locator services
- Live phone support for claimant inquiries and requests
- Claim form processing
- Claim form review and audit
- Check printing and issuance
- Design and hosting of website access portals
- Online claim receipt confirmation portal
- Ongoing technical consultation throughout the life cycle of the case
- Check and claim form replacement upon request

WE ALSO PROVIDE THE FOLLOWING OPTIONAL SERVICES:

- Periodic status reporting
- Customized rapid reporting on demand
- Issue reminder postcards
- Consultation on damage analyses, calculation and valuation
- Interpretation of raw data to conform to plan of allocation
- Issue claim receipt notification postcards
- Online portal to provide claims forms, status and contact information
- Dedicated toll-free claimant assistance line
- Evaluation and determination of claimant disputes
- Opt-out/Objection processing
- Notice translation
- Integrated notice campaigns, including broadcast, print and e-campaigns
- Pre-paid claim return mail envelope service
- Web-based claim filing
- 24/7 call center support
- Damage measurement and development of an equitable plan of allocation

WE ALSO PROVIDE CALCULATION AND WITHHOLDING OF ALL REQUIRED FEDERAL AND STATE TAX PAYMENTS, INCLUDING:

- Individual class member payments
- Qualified Settlement Fund (QSF) tax filings
- Employment tax filings and remittance
- Generation and issuance of W-2s and 1099s
- Integrated reporting and remittance services, as well as client-friendly data reports for self-filing

**Don't see the service you are looking for?
Ask us. We will make it happen.**



FOR MORE INFORMATION, PLEASE CONTACT:

Phone: 1.866.742.4955 (toll free)

Email: info@rg2claims.com

WWW.RG2CLAIMS.COM



BOUTIQUE ADMINISTRATOR WITH WORLD-CLASS CAPABILITIES

PHILADELPHIA • NEW YORK • ATLANTA • SAN DIEGO • SAN FRANCISCO