

1 GREENSTONE LAW APC
2 Mark S. Greenstone (SBN 199606)
3 mgreenstone@greenstonelaw.com
4 Benjamin N. Donahue (*Pro Hoc Vice*)
5 bdonahue@greenstonelaw.com
6 1925 Century Park East, Suite 2100
7 Los Angeles, California 90067
8 **Telephone:** (310) 201-9156

9 Attorneys for Plaintiffs

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF MERCED**

12 LISA HAGGERTY and CHRIS SWEARINGIN,
13 on behalf of themselves and all others similarly
14 situated,

15 Plaintiffs,

16 vs.

17 CONSUMER SAFETY TECHNOLOGY, LLC
18 d/b/a INTOXALOCK and DOES 1 - 10,
19 inclusive,

20 Defendants.

Case No.: 22CV-01414

*Assigned for All Purposes to Hon. Stephanie
L. Jamieson, Courtroom 8*

**DECLARATION OF JORDAN TURNER
REGARDING IMPLEMENTATION OF
NOTICE PROGRAM AND
VERIFICATION OF COMPLIANCE
WITH NOTICE REQUIREMENTS**

Hearing Date: March 3, 2025

Hearing Time: 8:15 a.m.

Courtroom: 8

1 I, Jordan Turner, hereby declare and verify as follows:

2 **I. INTRODUCTION**

3 1. ***Personal Information.*** I am a Project Manager for the Court-appointed Claims
4 Administrator, EisnerAmper. EisnerAmper was retained as the Claims Administrator in this case, and, as
5 the Project Manager over this Settlement, I am personally familiar with the facts set forth in this declaration.

6 2. ***The Capacity and Basis of this Declaration and Verification.*** I am over the age of 21.
7 Except as otherwise noted, the matters set forth in this Declaration and Verification are based upon my
8 personal knowledge, information received from the parties in this proceeding, and information provided by
9 my colleagues at EisnerAmper and our partners.

10 3. As the duly appointed Claims Administrator, I verify compliance with the Notice
11 requirements contained in the Settlement Agreement, and the Court's Preliminary Approval Order.

12 **II. BACKGROUND**

13 4. ***Preliminary Approval.*** On October 28, 2024, the Court entered its order preliminarily
14 approving the Settlement Agreement and the appointment of EisnerAmper as Claims Administrator. After
15 the Court's preliminary approval of the Settlement, EisnerAmper began to implement and coordinate the
16 Notice Program.

17 5. ***The Purpose of this Declaration and Verification.*** I submit this Declaration to evidence
18 EisnerAmper's compliance with the terms of the Preliminary Approval Order, to detail EisnerAmper's
19 execution of its role as the Claims Administrator, and to verify compliance with the Notice requirements
20 contained in the Settlement Agreement, and the Court's Preliminary Approval Order.

21 **III. CLASS NOTICE PROGRAM EXECUTION**

22 6. ***Notice Database.*** EisnerAmper maintains a database of 25,670 Settlement Class Members
23 which was used to effectuate the Notice campaign as outlined within the Settlement Agreement.
24 EisnerAmper received the class data from Defense Counsel ("Class Member Contact List") on November
25 5, 2024, in one Excel file with a total of 25,672 records. EisnerAmper de-duplicated the data records
26 provided based on phone number and determined that the Class Member Contact List consists of 25,670
27 unique Settlement Class Members.
28

1 7. The Class Member Contact List contained 9,953 records with a phone number and either a
2 missing or incomplete name, mailing address, or email address. EisnerAmper performed reverse look-up
3 searches, and an email append for these 9,953 records. After conducting the reverse look-up and email
4 append, EisnerAmper identified email addresses for 22,468 Settlement Class Members and mailing address
5 sufficient to attempt mailing the Settlement Class Notice for 23,871 Settlement Class Members.

6 8. **Email Notice.** Before sending the notice by email, EisnerAmper performed an email hygiene
7 and verification process designed to protect the integrity of the email campaign and maximize deliverability.
8 That process included deduplication, syntax validation, misspelled domain detection and correction, domain
9 validation, and risk validation. Email addresses for 21,233 Settlement Class Members passed the hygiene
10 and verification process. In sending the email notice, EisnerAmper followed standard email best practices,
11 including utilizing “unsubscribe” links and the Claims Administrator contact information. Beginning on
12 December 12, 2024, EisnerAmper caused the Settlement Class Notice to be sent via email (“Email Notice”)
13 to the 21,233 deliverable email addresses for Settlement Class Members. The Email Notice contained a
14 GUID link to the Claim Form on the Settlement Website. Ultimately, the Email Notice was successfully
15 delivered to 19,492 email addresses, or 91.8% deliverability. A true and correct copy of the Email Notice
16 sent is attached hereto as **Exhibit A**.

17 9. **Mail Notice.** EisnerAmper coordinated and caused the Settlement Class Notice in the form
18 of a postcard to be mailed via First-Class Mail (“Postcard Notice”) to Settlement Class Members for which
19 a mailing address was available from the class data. The Postcard Notice included (a) a “tear-off” Claim
20 Form with prepaid return postage, (b) a QR code that Settlement Class Members can scan to link directly to
21 the Claim Form on the Settlement Website, (c) the web address to the case website for access to additional
22 information, (d) a description of the rights and options as a Settlement Class Member and the dates by which
23 to act on those options, and (e) the date of the Final Approval Hearing. The Notice mailing commenced on
24 or before December 12, 2024, in accordance with the Preliminary Approval Order. A true and correct copy
25 of the Postcard Notice is attached hereto as **Exhibit B**, with a copy of the long-form Settlement Class Notice
26 (English and Spanish) and the Claim Form (English and Spanish).

27 10. **Mailing Address Validation.** Prior to the mailing, all mailing addresses were checked against
28

1 the National Change of Address (NCOA) database maintained by the United States Postal Service
2 (“USPS”). In addition, the addresses were certified via the Coding Accuracy Support System (CASS) to
3 ensure the quality of the zip code and verified through Delivery Point Validation (DPV) to verify the
4 accuracy of the addresses. Of the 23,871 Settlement Class Members records with a mailing address, 796
5 records did not successfully pass the address validation procedures noted above.

6 11. **Mail Notice Delivery.** In the initial mailing campaign, EisnerAmper executed mailings to
7 23,075 Settlement Class Members. EisnerAmper executed skip tracing on the 796 records that did not pass
8 address validation and was able to mail Postcard Notice to an additional 428 Settlement Class Members.
9 EisnerAmper also executed supplemental mailings for 1,352 Settlement Class Members for which the initial
10 Postcard Notice was not deliverable but for which EisnerAmper was able to obtain an alternative mailing
11 address through (1) forwarding addresses provided by the USPS, (2) skip trace searches using a third-party
12 vendor database, or (3) requests received directly from Settlement Class Members. Mail notice delivery
13 statistics are detailed in paragraph 15 below.

14 12. **Settlement Post Office Box.** EisnerAmper maintains the following Post Office Box for the
15 Settlement Program:

16 Intoxalock Claims Administrator

17 PO Box 4325

18 Baton Rouge, LA 70821

19 This P.O. Box serves as a location for the USPS to return undeliverable program mail to
20 EisnerAmper and for Settlement Class Members to submit exclusion requests, Claim Forms, and other
21 settlement-related correspondence. The P.O. Box address appears prominently in all Settlement Class
22 Notices, the Claim Form, and in multiple locations on the Settlement Website. EisnerAmper monitors the
23 P.O. Box daily and uses a dedicated mail intake team to process each item received.

24 13. **Settlement Website.** On December 12, 2024, EisnerAmper published the Settlement Website,
25 www.CallRecordingLawsuit.com. Visitors to the Settlement Website can download the long-form
26 Settlement Class Notice (English & Spanish), the Claim Form (English & Spanish), as well as Court
27 Documents, such as the Class Action Complaint, the Defendant’s Answer to the Complaint, the Settlement
28

1 Agreement, Motions filed by Class Counsel, Orders of the Court, and other relevant documents. Visitors
2 are also able to submit claims electronically, find answers to frequently asked questions (FAQs), important
3 dates and deadlines, and contact information for the Claims Administrator. As of February 3, 2025, the
4 Settlement Website received 8,539 unique visits.

5 14. ***Toll-Free Number.*** On December 12, 2024, EisnerAmper established a dedicated toll-free
6 telephone number, 1-888-896-7617 (the “Toll-Free Number”), which is available twenty-four hours per day.
7 Settlement Class Members can call and interact with an interactive voice response system that provides
8 important settlement information and offers the ability to leave a voicemail message to address specific
9 requests or issues. EisnerAmper also provided copies of the long-form Settlement Class Notice, paper Claim
10 Form, as well as the Settlement Agreement, upon request to Settlement Class Members, through the Toll-
11 Free Number. The Toll-Free Number appeared in all Settlement Class Notices, as well as in multiple
12 locations on the Settlement Website. The Toll-Free Number will remain active through the close of this
13 Settlement Program.

14 15. ***Email Support.*** EisnerAmper established an Email address,
15 info@CallRecordingLawsuit.com, to provide an additional option for Settlement Class Members to address
16 specific questions and requests to the Claims Administrator for support.

17 IV. **NOTICE PROGRAM REACH**

18 16. ***Notice Reach Results.*** Through the Notice procedures outlined above, EisnerAmper
19 attempted to send direct notice to 24,179 (94.2%) Settlement Class Members. As of February 3, 2025, the
20 Notice Program reached a total of 23,549 (91.7%) of Settlement Class Members. Among the 23,549
21 Settlement Class Members to receive notice, 18,320 (77.8%) received both Email Notice and Postcard
22 Notice. Table 1 below provides an overview of dissemination results for the Notice Program and reach
23 statistics for the Notice Program.

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25 ///

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Table 1: Notice Dissemination Statistics		
Description	Volume (#)	Percentage of Class Members (%)
Class Member Records	25,670	100.0%
Email Notice		
(+) Total Email Notices Sent	21,233	82.7%
(+) Total Email Notices Delivered	19,492	75.9%
(-) Total Email Notices Bounced/Undeliverable	1,741	6.8%
Mail Notice		
(+) Postcard Notices Mailed (Initial Campaign)	23,075	89.9%
(+) Postcard Notices Mailed (Initial Skip Traces)	428	1.7%
(-) Total Postcards Returned as Undeliverable	2,464	9.6%
Mail Notice Re-Mailed		
(+) Total Postcards Rемаiled	1,352	5.3%
(-) Total Postcards Returned as Undeliverable	14	0.1%
Direct Notice Program Reach		
(+) Received Only Mail Notice	4,057	15.8%
(+) Received Only Email Notice	1,172	4.6%
(+) Received Both Mail & Email Notice	18,320	71.4%
(=) Received Direct Notice	23,549	91.7%

V. CLAIM ACTIVITY

17. ***Claim Intake and Processing.*** Settlement Class Members have the option of submitting Claims online or mailing the printed or Postcard Claim Form to the Claims Administrator. The online claim submission feature was available beginning December 12, 2024. As of February 3, 2025, EisnerAmper has received a total of 5,306 claims submissions. Of these, EisnerAmper has determined that 4,884 claims (approximately 19.0% of the Settlement Class Members) are non-duplicative and from Settlement Class Members. EisnerAmper will continue to intake and analyze claims postmarked by the claims filing deadline of March 12, 2025. Table 2 below provides summary statistics and current dispositions.

Table 2: Claim Statistics (as of February 3, 2025)	
Description	Volume (#)
Total Claims Received	5,306
(-) Duplicate Claims	410
(-) Invalid: Not a Class Member	12
(=) Net Claims	4,884

18. ***Net Settlement Fund.*** The Net Settlement Fund available to Authorized Claimants is estimated to be \$1,057,584.11 and was calculated by subtracting the requested attorneys' fees (\$582,500), the requested litigation costs (\$20,313.23), the requested Class Representative Service Award (\$5,000), and the requested notice and administration costs (\$82,102.66) from the Gross Settlement Amount (\$1,747,500). Therefore, each Authorized Claimant's pro rata payment is currently estimated to be \$216.54.

VI. EXCLUSIONS AND OBJECTIONS

19. ***Exclusions (Opt-Outs) Received.*** The Settlement Agreement and long-form Settlement Class Notice directed exclusion requests to be mailed to the Claims Administrator. EisnerAmper has not received any exclusion requests from Settlement Class Members as of February 3, 2025. EisnerAmper will continue to intake exclusion requests postmarked by the exclusion deadline of February 10, 2025.

20. ***Settlement Objections.*** The Settlement Agreement and long-form Settlement Class Notice directed objections be submitted to the Court. EisnerAmper has not received any objections from Settlement Class Members. The deadline to object to the Settlement is February 10, 2025.

VII. NOTICE AND ADMINISTRATION COSTS

21. ***Costs of Notice Program.*** EisnerAmper has incurred \$54,894.30 in fees and costs completing the notice plan and administering the Settlement and anticipates incurring an additional \$27,208.36 in fees and costs for a total administration cost of \$82,102.66.

VIII. CERTIFICATION

I, Jordan Turner, declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 3rd day of February, 2025 at Houston, Texas.

Jordan Thuer

Jordan Turner

TABLE OF EXHIBITS

Exhibit A	Email Notice
Exhibit B	Postcard Notice
	Long-form Settlement Class Notice (English and Spanish)
	Claim Form (English and Spanish)

EXHIBIT A

EMAIL NOTICE

EMAIL NOTICE

Subject: Notice of Settlement: Lisa Haggerty, et al. v. Consumer Safety Technology, LLC

From: Intoxalock Claims Administrator (notice@pnclassaction.com)

Reply to: info@CallRecordingLawsuit.com

Your Settlement Claim ID is: {XXX-1235487}

COURT ORDERED LEGAL NOTICE

A Court authorized this summary notice. It is not from a lawyer and you are not being sued.

(Una copia de este aviso en español se encuentra a continuación inmediatamente después de la versión en inglés.)

YOU MAY BE ELIGIBLE FOR UP TO \$5,000.00 IF YOU HAD A CALL WITH INTOXALOCK.

Click here to file a claim (the "Claim Form") by the March 12, 2025 Claim Deadline.

A settlement has been reached in a class action lawsuit alleging that defendant Consumer Safety Technology LLC, also known as Intoxalock (the "Defendant"), violated California law prohibiting the recording of telephone calls without consent. You have received this notice because Defendant's telephone records indicate you had one of these calls.

This notice is a summary only. Please visit the Settlement Website, www.CallRecordingLawsuit.com for more information.

What is this lawsuit about?

In this lawsuit, titled Lisa Haggerty, et al. v. Consumer Safety Technology, LLC, Case No. 22CV-01414, Superior Court for the State of California County of Merced (the "Action"), the Class Representative allege that the Defendant violated California Penal Code Section 632.7 by recording telephone calls without consent. Defendant denies any wrongdoing or liability. Both sides have agreed to settle to avoid the costs and uncertainty of continued litigation and trial.

Am I a Settlement Class Member?

The Settlement Class includes persons listed in Defendant's records with a telephone number bearing a California prefix and/or a California address who had one or more calls with Defendant's sales representative during the period from and including May 18, 2021 through February 8, 2022 (the "Class Period"). You are receiving this notice because Defendant's telephone records indicate you had one of these calls.

If you are not sure whether you are a Settlement Class Member, you can contact the Claims Administrator by calling 1-888-896-7617 or by emailing info@CallRecordingLawsuit.com to ask whether your telephone number(s) appear on the list of qualifying calls for the Class Period.

What can I get?

The settlement establishes a \$1,747,500 settlement fund that, after payment of certain court-approved amounts, is intended for distribution to Settlement Class Members. You may be entitled to a pro rata share of the settlement fund, up to \$5,000.00 which will be determined by the total number of valid claims made. The settlement, including the release of claims, is explained in more detail on the long-form notice and in the settlement agreement, both of which are available at www.CallRecordingLawsuit.com. You may submit an address update **here**.

How do I get a payment?

To receive a settlement payment, you must submit a Claim Form by March 12, 2025.

There are multiple ways to submit a Claim Form. You may submit an online Claim Form **here**, or by visiting the Settlement Website located at www.CallRecordingLawsuit.com. You may also obtain a hard copy Claim Form from the Settlement Website, by calling 1-888-896-7617, or by writing to the Claims Administrator at P.O. Box 4325, Baton Rouge, LA 70821. If you received a Postcard Notice, you may submit a Claim Form by scanning the QR code or mailing in the accompanying tear-off Claim Form. Any Claim Form that is mailed must be postmarked no later than **March 12, 2025**.

To submit a Claim Form online at the Settlement Website, you **MUST** provide your Settlement Claim ID, which appears at the top of this email notice. You also may obtain the required Settlement Claim ID by contacting the Claims Administrator by telephone 1-888-896-7617 or email info@CallRecordingLawsuit.com.

Who Represents Me?

The Court has appointed Mark S. Greenstone and Benjamin N. Donahue of Greenstone Law APC as Settlement Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense. Settlement Class Counsel's contact information is:

Mark S. Greenstone
mgreenstone@greenstonelaw.com
Benjamin N. Donahue
bdonahue@greenstonelaw.com

GREENSTONE LAW APC
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
(310) 201-9156

What are my rights?

If you do nothing you will remain a Settlement Class Member. You will be legally bound by the settlement and any orders or judgments entered in connection therewith, and you will give up any rights you have to sue the Defendant for the claims alleged in the Action. If you do not wish to be legally bound by the settlement, you may exclude yourself by submitting an exclusion request by **February 10, 2025**. If you remain in the Settlement Class, you may object to the settlement by submitting an objection by **February 10, 2025**. The long-form notice located at www.CallRecordingLawsuit.com explains how to exclude yourself and how to object to the settlement. For more information concerning the settlement and your rights, you may contact the Claims Administrator or Settlement Class Counsel.

When will the Court Determine Whether to Approve the Settlement?

A final hearing will be held on **March 3, 2025 at 8:15 a.m. Pacific Time** at the Superior Court of California, Merced County, Courtroom 8, 627 W. 21st Street, Merced, CA 95340, to consider whether to approve Settlement, Settlement Class Counsel's request for attorneys' fees of up to 1/3 of the settlement fund (plus expenses) and a service award to the Class Representative. You may attend the hearing, but do not have to.

Intoxalock Claims Administrator
c/o Eisner Amper
P.O. Box 4325
Baton Rouge, LA 70821
1-888-896-7617
www.CallRecordingLawsuit.com

Su identificación del Reclamo de la Conciliación es: {XXX-1235487}

AVISO LEGAL ORDENADO POR UN TRIBUNAL

Un Tribunal autorizó este aviso de resumen. No es de un abogado y no se le está demandando.

(Una copia de este aviso en español se encuentra inmediatamente después de la versión en inglés).

PUEDE SER ELEGIBLE PARA RECIBIR HASTA \$5,000.00 SI TUVO UNA LLAMADA CON INTOXALOCK.

Haga clic aquí para presentar un reclamo (el “Formulario de Reclamo”) antes del 12 de marzo de 2025, la fecha límite del reclamo.

Se ha llegado a una conciliación en una demanda colectiva en la que se alega que el demandado, Consumer Safety Technology LLC, también conocido como Intoxalock (el “Demandado”), violó la ley de California que prohíbe la grabación de llamadas telefónicas sin consentimiento. Usted recibió este aviso porque los registros telefónicos del Demandado indican que tuvo una de estas llamadas.

Este aviso es solo un resumen. Visite el Sitio web de la Conciliación, www.CallRecordingLawsuit.com para obtener más información.

¿De qué se trata esta demanda?

En esta demanda, con título Lisa Haggerty, et al. contra Consumer Safety Technology, LLC, n.º de caso 22CV-01414, Tribunal Superior del Estado de California del Condado de Merced (la “Demanda”), el Representante del Colectivo alega que el Demandado violó la Sección 632.7 del Código Penal de California al grabar llamadas telefónicas sin consentimiento. El Demandado niega cualquier delito o responsabilidad. Ambas partes acordaron llegar a una conciliación para evitar los costos y la incertidumbre de continuar con litigios y juicios.

¿Soy Miembro del Colectivo de la Conciliación?

El Colectivo de la Conciliación incluye a las personas mencionadas en los registros del Demandado que tienen un número de teléfono con un prefijo de California o una dirección de California y que tuvieron una o más llamadas con un representante de ventas de Intoxalock durante el período comprendido entre el 18 de mayo de 2021 y el 8 de febrero de 2022 (el “Período de la Demanda Colectiva”). Usted recibe este aviso porque los registros telefónicos del Demandado indican que tuvo una de estas llamadas.

Si no está seguro de que usted sea Miembro del Colectivo de la Conciliación, puede comunicarse con el Administrador de Reclamos llamando al 1-888-896-7617 o enviando un correo electrónico a info@CallRecordingLawsuit.com para saber si sus números de teléfono aparecen en la lista de llamadas que califican para el Período de la Demanda Colectiva.

¿Qué puedo obtener?

La conciliación establece un fondo de conciliación de \$1,747,500 que, después del pago de ciertos montos aprobados por el tribunal, se destinará para su distribución entre los Miembros del Colectivo de la Conciliación. Es posible que usted tenga derecho a una parte proporcional del fondo de conciliación de hasta \$5,000.00, que se determinará en función del número total de reclamos válidos realizados. La conciliación, incluida la exención de reclamos, se explica más a detalle en el formato extendido del aviso y en el acuerdo de conciliación, los cuales están disponibles en www.CallRecordingLawsuit.com. Puede enviar una actualización de su dirección haciendo clic **aquí**.

¿Cómo obtengo el pago?

Para recibir el pago de la conciliación, debe presentar un Formulario de Reclamo antes del 12 de marzo de 2025.

Hay varias maneras de presentar un Formulario de Reclamo. Puede presentar un Formulario de Reclamo en línea **aquí**, o visitando el Sitio web de la Conciliación en www.CallRecordingLawsuit.com. También puede obtener una copia impresa del Formulario de Reclamo en el Sitio web de la Conciliación, llamando al 1-888-896-7617, o escribiendo al Administrador de Reclamos a P.O. Box 4325, Baton Rouge, LA 70821. Si recibió un aviso por correo postal, puede presentar un Formulario de Reclamo escaneando el código QR o enviando el Formulario de Reclamo desprendible adjunto por correo. Todo Formulario de Reclamo que se envíe por correo deberá llevar matasellos con fecha no posterior al **12 de marzo de 2025**.

Para presentar un Formulario de Reclamo en línea en el Sitio web de la Conciliación, DEBE proporcionar su número de identificación del Reclamo de la Conciliación, que aparece en la parte superior de este aviso por correo electrónico. También puede obtener el número de identificación del Reclamo de la Conciliación requerido comunicándose por teléfono con el Administrador de Reclamos al 1-888-896-7617 o por correo electrónico en info@CallRecordingLawsuit.com.

¿Quién me representa?

El Tribunal designó a Mark S. Greenstone y Benjamin N. Donahue de Greenstone Law APC como Abogados del Colectivo de la Conciliación. No se le cobrará por los servicios de estos abogados. Si usted desea que le represente su propio abogado en este caso, puede contratarlo por su cuenta. La información de contacto de los Abogados del Colectivo de la Conciliación es:

Mark S. Greenstone
mgreenstone@greenstonelaw.com
Benjamin N. Donahue
bdonahue@greenstonelaw.com
GREENSTONE LAW APC

1925 Century Park East, Suite 2100
Los Angeles, CA 90067
(310) 201-9156

¿Cuáles son mis derechos?

Si usted no lleva a cabo ninguna acción, seguirá siendo Miembro del Colectivo de la Conciliación. Estará legalmente obligado por la conciliación y por cualquier orden o sentencia dictada en relación con la misma, y renunciará a cualquier derecho que tenga para demandar al Demandado por los reclamos alegados en la Demanda. Si no desea estar legalmente obligado por la conciliación, puede excluirse presentando una solicitud de exclusión antes del **10 de febrero de 2025**. Si permanece en el Colectivo de la Conciliación, puede objetar la conciliación presentando una objeción antes del **10 de febrero de 2025**. El formato extendido del aviso que se encuentra en www.CallRecordingLawsuit.com explica cómo puede excluirse y cómo puede objetar a la conciliación. Para obtener más información sobre la conciliación y sus derechos, puede comunicarse con el Administrador de Reclamos o con los Abogados del Colectivo de la Conciliación.

¿Cuándo decidirá el Tribunal si aprueba la Conciliación?

Se llevará a cabo una audiencia final el **3 de marzo de 2025** a las **8:15 a. m., hora del Pacífico**, en el Tribunal Superior de California, Condado de Merced, Sala 8, 627 W. 21st Street Merced, CA 95340, para determinar si se aprueba la Conciliación, la solicitud de los Abogados del Colectivo de la Conciliación de honorarios de abogados de hasta 1/3 del fondo de conciliación (más gastos) y una compensación por servicios para el Representante del Colectivo. Puede asistir a la audiencia, aunque no está obligado a hacerlo.

Intoxalock Claims Administrator
c/o Eisner Amper
P.O. Box 4325
Baton Rouge, LA 70821
1-888-896-7617
www.CallRecordingLawsuit.com

EXHIBIT B

POSTCARD NOTICE

COURT-ORDERED LEGAL NOTICE

A court authorized this summary notice. It is not from a lawyer and you are not being sued.

YOU MAY BE ELIGIBLE FOR UP TO \$5,000.00 IF YOU HAD A CALL WITH INTOXALOCK.

A settlement has been reached in a class action lawsuit alleging that defendant Consumer Safety Technology LLC, also known as Intoxalock (the “Defendant”), violated California law prohibiting the recording of telephone calls without consent. You have received this notice because Defendant’s telephone records indicate you had one of these calls.

To make a claim, please complete and return the attached pre-stamped Claim Form, or submit a Claim Form online by scanning the QR code below, or by visiting the Settlement Website, www.CallRecordingLawsuit.com.

Intoxalock Settlement Administrator

P.O. Box 4325
Baton Rouge, LA 70821

PRESORTED
FIRST CLASS
U.S. POSTAGE

PAID
FPI



ELECTRONIC SERVICE REQUESTED

SETTLEMENT CLAIM ID: [claim Id]
[FIRST NAME] [LAST NAME]
[ADDRESS1]
[ADDRESS2]
[CITY] [STATE] [ZIP]



Lisa Haggerty, et al. v. Consumer Safety Technology, LLC, Case No. 22CV-01414
Superior Court for the State of California, County of Merced

THIS SUMMARY PROVIDES LIMITED INFORMATION ABOUT THE SETTLEMENT.
PLEASE VISIT www.CallRecordingLawsuit.com FOR MORE INFORMATION

What is this Lawsuit About? In this lawsuit, plaintiffs claim that Defendant violated California Penal Code Section 632.7 by recording telephone calls without consent. Defendant denies any wrongdoing or liability. Both sides have agreed to settle to avoid the costs and uncertainty of continued litigation and trial.

Am I a Settlement Class Member? The Settlement Class includes persons listed in Defendant's records with a telephone number bearing a California prefix and/or a California address who had one or more calls with a Defendant's sales representative during the period from and including May 18, 2021 through February 8, 2022. You are receiving this notice because Defendant's telephone records indicate you had one of these calls.

What can you get? The settlement establishes a \$1,747,500 settlement fund that, after payment of certain court-approved amounts, is intended for distribution to Settlement Class Members. You may be entitled to a pro rata share of the settlement fund, up to \$5,000.00 which will be determined by the total number of valid claims made. The settlement, including the release of claims, is explained in more detail on the long-form notice and in the settlement agreement, both of which are available at www.CallRecordingLawsuit.com.

How do I get a payment? To qualify for payment, you must complete and return the attached Claim Form, or submit a valid Claim Form online by scanning the QR code on the front of this notice or visiting www.CallRecordingLawsuit.com, by **March 12, 2025**.

Who Represents Me? The Court has appointed Mark S. Greenstone and Benjamin N. Donahue of Greenstone Law APC, 1925 Century Park E., Ste. 2100, Los Angeles, CA 90067, (310) 201-9156, as Settlement Class Counsel.

What are your rights? If you do nothing you will remain a Settlement Class Member. You will be legally bound by the settlement and any orders or judgments entered in connection therewith, and you will give up any rights you have to sue Defendant for the claims alleged in the lawsuit. If you do not wish to be legally bound by the settlement, you may exclude yourself by submitting an exclusion request by **February 10, 2025**. If you remain in the Settlement Class, you may object to the settlement by submitting an objection by **February 10, 2025**. The long-form notice located at www.CallRecordingLawsuit.com explains how to exclude yourself and how to object to the settlement. For more information concerning the settlement and your rights, you may contact the Claims Administrator or Settlement Class Counsel.

When will the Court Consider Whether to Approve the Settlement? The Court will hold a hearing on **March 3, 2025 at 8:15 a.m. Pacific Time** at the Superior Court of California, Merced County, Courtroom 8, 627 W. 21st Street, Merced, CA 95340, to consider whether to approve the settlement and Settlement Class Counsel's request for attorneys' fees of up to 1/3 of the settlement fund (plus expenses) and a service award to the Class Representative.

All capitalized terms in this notice are defined in the Settlement Agreement, which can be found at www.CallRecordingLawsuit.com.

Claim Form

You may be eligible for a cash payment from this Class Action Settlement. To complete this Claim Form, confirm your phone number, select your payment method, **sign** and **date** the Claim Form and mail it to the Claims Administrator by **March 12, 2025**. You may also submit a Claim Form online at www.CallRecordingLawsuit.com. If you would like to update your contact information, please visit www.CallRecordingLawsuit.com. If you submit a claim, you may be required to provide your social security number or TIN to receive the full pro rata payment or you may receive a reduced payment.

Settlement Claim ID: [Claim ID]

[FIRST NAME] [LAST NAME]

[ADDRESS1]

[ADDRESS2]

[CITY] [STATE] [ZIP]

Affected Phone Number: XXX-XXX-[XXXX]



www.CallRecordingLawsuit.com

Please select one of the following payment methods: ☐ Paper Check ☐ Digital Payment

Current Email Address (Required if you have selected digital payment)

[illegible]

Prior to disbursement, the email address provided above will be sent an email where you will be able to select from multiple payment options.

By signing this claim, I certify that I used the telephone number ending in the 4 digits listed above to communicate with Intoxalock during the period May 18, 2021 through February 8, 2022.

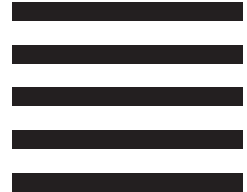
*Signature: _____ *Date (MM/DD/YY): ____/____/____

Denotes Information You Must Provide To Have A Valid Claim
Questions? Visit www.CallRecordingLawsuit.com or call 1-888-896-7617





NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 416 BATON ROUGE, LA

POSTAGE WILL BE PAID BY ADDRESSEE

Intoxalock Settlement Administrator
P.O. BOX 4325
BATON ROUGE, LA 70821-9813



EXHIBIT B
LONG-FORM
SETTLEMENT
CLASS NOTICE
(English and Spanish)

LONG-FORM NOTICE

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

Haggerty et al. v. Consumer Safety Technology LLC, Case No. 22CV-01414
Superior Court for the State of California, County of Merced

READ THIS NOTICE CAREFULLY YOUR LEGAL RIGHTS MAY BE AFFECTED

A Court authorized this summary notice. It is not from a lawyer and you are not being sued.

(Una copia de este aviso en español se encuentra a continuación inmediatamente después de la versión en inglés.)

All natural persons listed in Consumer Safety Technology LLC's, also known as Intoxalock ("Defendant"), records with a telephone number bearing a California prefix and/or a California address who had one or more telephone conversations with Defendant's sales representatives at any time during the period from and including May 18, 2021 through February 8, 2022, may be entitled to up to \$5,000.00 (the "Settlement Payment") from a class action settlement (the "Settlement") in the above-titled lawsuit ("Action"). This Settlement covers the above calls with Defendant. Please read the rest of this notice to find out more.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

Participate in the Settlement	If you wish to receive a Settlement Payment, read this notice for information on how to file a claim. If you do not file a Claim Form by March 12, 2025 , you will not receive a Settlement Payment.
Exclude Yourself from the Settlement	If you do not want to participate in the Settlement, you must send a letter requesting exclusion postmarked no later than February 10, 2025 or else you will be bound by the Settlement and release any claims you may have against Defendant relating to the conduct alleged in the Action.
Object to the Settlement	If you wish to object to the Settlement, you must follow the directions in this notice. The deadline to object is February 10, 2025 . If you submit a timely objection to the Settlement, you may also indicate in the objection whether you wish to appear in court and be heard at the time of the final fairness hearing.
Do Nothing	If you do nothing with respect to this notice, you will not receive any Settlement Payment and you will be bound by the terms of the Settlement, including the release of claims described below.

**THESE RIGHTS AND OPTIONS, INCLUDING THE DEADLINES BY WHICH YOU MUST
EXERCISE THEM, ARE EXPLAINED BELOW**

What is the Case About?

This Action alleges that Defendant violated California Penal Code Section 632.7 prohibiting the recording of telephone calls without notice to or consent of callers. **The case covers calls between persons listed in Defendant's records with a telephone number bearing a California prefix and/or who have a California address and Defendant's sales' representatives at any time during the period from and including May 18, 2021 through February 8, 2022 ("Class Period").**

What is a Class Action?

In a class action, one or more people called Class Representatives sue on behalf of people who have claims similar to their own.

Am I a Settlement Class Member?

You are a Settlement Class Member if you are a person with a telephone number bearing a California prefix and/or with a California address who had a telephone conversation with one or more of Defendant's sales' representatives during the Class Period.

Defendant has a record of individuals with telephone numbers bearing a California prefix and/or a California address who engaged in one or more telephone conversations with Defendant's sales representatives during the Class Period. If you received notice of this proposed Settlement by U.S. mail, email or otherwise, there are records indicating that you are a Settlement Class Member entitled to submit a Claim Form. You may be a Settlement Class Member even if you did not receive a mailed or emailed notice of this proposed Settlement if you had one or more conversations with Defendant's sales representatives as described in the bold language in the "What Is This Case About" section above. If you are not sure whether you qualify, you can contact the Claims Administrator by calling 1-888-896-7617 or by emailing info@CallRecordingLawsuit.com to ask whether your telephone number or numbers appear on the list of qualifying calls.

Why is There a Settlement?

Defendant denies that it is liable for the claims alleged in the Action, and the Court has not decided in favor of either side. But, both sides agreed to a settlement to avoid the uncertainty and cost of further litigation and a trial, and to provide benefits to Settlement Class Members promptly. The terms of the Settlement are spelled out in the Settlement Agreement and Release, which you may access through the Settlement Website, www.CallRecordingLawsuit.com, by calling 1-888-896-7617, or by writing to the Claims Administrator at P.O. Box 4235, Baton Rouge, LA 70821.

What Can I Get From The Settlement?

The Defendant has agreed to create a Settlement Fund of \$1,747,500.00. Following the final approval of the Settlement, class action notice and administration fees and costs, a service payment

to the Class Representative, and Settlement Class Counsel's attorneys' fees and costs will be deducted from the Settlement Fund. The amount remaining in the Settlement Fund after these deductions will be paid out to Settlement Class Members in an amount that shall be calculated pro rata based on the number of valid Claim Forms that are submitted by the Settlement Class Members, and is subject to a per person cap of \$5,000.00.

The Claims Administrator can verify each telephone number used during the Class Period. If you would like information regarding your unique telephone number or numbers associated with your claim, you can contact the Claims Administrator by calling 1-888-896-7617 or by emailing info@CallRecordingLawsuit.com.

What Do I Need to Do to Receive a Settlement Payment?

You must complete a Claim Form and return it to the Claims Administrator on time. There are multiple ways to submit a Claim Form. You may submit a Claim Form online at the Settlement Website, www.CallRecordingLawsuit.com. You may also obtain a hard copy Claim Form from the Settlement Website, by calling 1-888-896-7617, or by writing to the Claims Administrator at P.O. Box 4325, Baton Rouge, LA 70821. If you received an email notice, you may click the link within the notice to submit a Claim Form online. If you received a postcard notice, you may scan the QR code on the postcard to submit a Claim Form online, or mail in the tear-off Claim Form. Any Claim Form that is mailed must be postmarked no later than **March 12, 2025**.

To submit a Claim Form online at the Settlement Website, you MUST provide your Settlement Claim ID, which can be found on the postcard and/or email notice you may have received. You also may obtain the required Settlement Claim ID by contacting the Claims Administrator by telephone at 1-888-896-7617 or email at info@CallRecordingLawsuit.com. A Claim Form will not be considered timely unless it is submitted online or sent to the Claims Administrator by mail and postmarked no later than **March 12, 2025**.

What Am I Giving Up to Get Settlement Benefits or Stay In the Settlement Class?

Unless you exclude yourself, as described below, you will remain in the Settlement Class and be bound by the terms of the Settlement and all of the Court's orders regardless of whether you submit a Claim Form. This means that you can't sue or be part of any other lawsuit against the Defendant or other Released Parties (defined below) about the issues in this case. Staying in the Settlement Class also means that you agree to the following release of claims, which describes the legal claims that you give up:

Released Claims by the Settlement Class. Upon entry of the Final Approval Order and Judgment, the Settlement Class Representatives and each Settlement Class Member, and their respective heirs, assigns, successors, agents, attorneys, executors, and representatives, shall be deemed to have and by operation of this Settlement and the Final Approval Order and Judgment fully, finally, irrevocably, and forever, released Defendant, and its past or present direct and indirect parents, affiliates and subsidiaries (whether or not wholly owned) and its respective present and former directors, officers, employees, agents, insurers, reinsurers, co-insurers, shareholders, members, attorneys, advisors, consultants, representatives, affiliates, third-party contractors or vendors, related companies, joint ventures, divisions, predecessors, successors, and

assigns and each of them (collectively, the “Released Parties”) from any and all liabilities, claims, causes of action, damages (whether actual, compensatory, statutory, punitive or of any other type), penalties, costs, attorneys’ fees, losses, or demands, whether known or unknown, in law or equity, existing or suspected or unsuspected, that were or reasonably could have been asserted based on the factual allegations contained in the Complaint relating to or arising out of the alleged recording, monitoring, or eavesdropping on telephone calls with Defendant from May 18, 2021 through February 8, 2022, inclusive (collectively, the “Released Claims”). Nothing herein shall be construed as a waiver or release by Defendant of claims against any third parties.

When Should I Receive My Settlement Payment?

The Court will hold a hearing on March 3, 2025 at 8:15 a.m. Pacific Time, to decide whether to give final approval to the Settlement. If the Settlement receives final approval, payments may be made as soon as June 16, 2025 but, depending on what happens in the case, payments could be delayed. You can stay informed of the progress of the Settlement through the dedicated Settlement Website at www.CallRecordingLawsuit.com. Please be patient. If the Court denies approval of the Settlement, no Settlement Payments will be sent out to anyone and the lawsuit will continue.

Can I Exclude Myself From the Settlement?

If you want to keep the right to sue the Defendant or any of the Released Parties on your own and at your own expense about the issues in this case, then you must take steps to exclude yourself from the Settlement. This is also called “opting out” of the Settlement. To exclude yourself from the Settlement, you must send a letter by United States first class mail to the Claims Administrator, containing: (1) the title of the Action; (2) your full name, address, and telephone number; (3) a statement that you request to be excluded from the Settlement; and (4) the telephone number(s) that you claim to have used to communicate with Defendant. Be sure to include your name, signature, and current address and telephone number. If you decide to exclude yourself, your letter requesting exclusion from the Settlement must be postmarked no later than **February 10, 2025** and mailed to:

Intoxalock Claims Administrator
c/o Eisner Amper
P.O. Box 4325
Baton Rouge, LA 70821

If you request exclusion from the Settlement, you will not get any benefits from the Settlement; you cannot object to the terms of the Settlement; and you will not be legally bound by anything that happens in this Action.

If I Don’t Exclude Myself, Can I Sue the Defendant for the Same Thing Later?

No. Unless you exclude yourself, you give up any right to sue the Defendant and any of the Released Parties for the claims that this Settlement resolves. If you have a pending lawsuit covering these same claims, speak to your lawyer in that case immediately. You must exclude yourself from this Settlement to continue your own existing lawsuit.

Do I Have a Lawyer in this Case?

The Court has appointed Mark S. Greenstone and Benjamin N. Donahue of Greenstone Law APC to represent you and other Settlement Class Members as Settlement Class Counsel. Settlement Class Counsel will be paid from the Settlement Fund and you will not be charged separately for this. If you want to be represented by your own lawyer, you may hire one at your own expense. Settlement Class Counsel's contact information is:

Mark S. Greenstone
mgreenstone@greenstonelaw.com
Benjamin N. Donahue
bdonahue@greenstonelaw.com
Greenstone Law APC
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
(310) 201-9156

How Will the Lawyers and the Class Representatives Be Paid?

Settlement Class Counsel will ask the Court to approve payment of up to \$582,500.00 (one-third of the Settlement Fund) in attorneys' fees and an additional amount for out-of-pocket costs, which are estimated not to exceed \$35,000.00. The fees would pay Settlement Class Counsel for investigating the facts, litigating the case, negotiating the Settlement, and following through to make sure that its terms are carried out. Settlement Class Counsel also will ask the Court to approve a payment of \$5,000.00 to the Class Representative for his service as Class Representative. The Court may award less than these amounts. These amounts, along with the costs of the Settlement's notice and administration, which are estimated not to exceed \$702,000.00, will be paid out of the Settlement Fund.

How Do I Tell the Court That I Don't Like the Settlement?

If there is something you do not like about the Settlement, you can tell the Court by filing an objection.

Any objection to the proposed Settlement must be in writing. All written objections and supporting papers must include: (1) a heading containing the name and case number of the Action; (2) the Settlement Class Member's name and postal address; (3) the telephone number(s) with which the Settlement Class Member communicated with Defendant; (4) a detailed statement of each objection, including, if available, the factual and legal basis for each objection; and (5) a statement of whether the Settlement Class Member intends to appear, either in person or through counsel, at the final approval hearing, and, if through counsel, a statement identifying the counsel's name, postal address, telephone number, and email address. Objections must be filed with the Court, and served by first class mail on Counsel for the Parties, no later than **February 10, 2025**. Whether or not an objection has been timely served shall be determined by the postmarked date.

What's the Difference Between Objecting and Excluding?

Objecting is telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class. If you object, you still must submit a timely Claim Form if you want to receive the benefits of the Settlement in the event that your objection is overruled and the Settlement is approved. Excluding yourself is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you. You cannot both object to and exclude yourself from the Settlement. Any persons who attempt both to object to and exclude themselves from the Settlement will be deemed to have excluded themselves and will forfeit the right to object to or participate in the Settlement or any of its terms. Similarly, you cannot both opt out and submit a Claim Form. If you submit a timely Claim Form and an opt-out request, the opt-out request shall be deemed void and the Claim Form will be processed under the terms of the Settlement.

When and Where Will the Court Decide Whether to Approve the Settlement?

The Court will hold a final fairness hearing regarding the Settlement at 8:15 a.m. Pacific Time on March 3, 2025 at the Merced County Superior Court, Courtroom 8, 627 W. 21st Street, Merced, CA 95340. At that hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court also will decide how much to pay to Settlement Class Counsel, the Class Representative, and the Claims Administrator. The Court also will determine whether it is appropriate to distribute any leftover Settlement Funds to the designated cy pres beneficiary, Consumer Federation of California. After the hearing, the Court will decide whether to approve the Settlement. Settlement Class Counsel do not know how long those decisions will take.

The final fairness hearing date or time may be changed without further notice. Any change to the final fairness hearing date or time will be posted on the Settlement Website, www.CallRecordingLawsuit.com.

Do I Have to Come to the Hearing?

No. Settlement Class Counsel will answer questions that the Court may have. But you are welcome to attend at your own expense. If you submit an objection, you don't have to come to Court to talk about it. As long as you file your written objection on time, the Court will consider it. You also may have your own lawyer attend at your own expense but doing so is not necessary.

You may ask the Court for permission to address any objection you may have to the Settlement at the final fairness hearing. To do so, you must submit a timely objection and include a statement that you intend to appear at the final fairness hearing.

What Happens if I Do Nothing At All?

If you do nothing, i.e. you do not submit a Claim Form or exclude yourself from the Settlement, then, you will remain in the Settlement Class; will be bound by the terms of the Settlement, including the Released Claims, and all of the Court's orders; will **not** receive any Settlement

benefits; and, can't sue or be part of any other lawsuit against the Defendant or the Released Parties about the issues in this Action.

Are There More Details About the Settlement?

This notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement and Release. You can get a copy of the Settlement Agreement and Release and other case documents through the Settlement Website, www.CallRecordingLawsuit.com, by calling 1-888-896-7617, or by writing to the Claims Administrator at P.O. Box 4325, Baton Rouge, LA 70821. You also can contact Settlement Class Counsel.

PLEASE DO NOT CALL THE COURT, THE COURT CLERK'S OFFICE, DEFENDANT OR DEFENDANT'S COUNSEL WITH ANY QUESTIONS RELATED TO THE SETTLEMENT.

FORMATO EXTENDIDO DEL AVISO

AVISO DE PROPUESTA DE CONCILIACIÓN DE DEMANDA COLECTIVA

Haggerty et al. contra Consumer Safety Technology LLC, n.º de caso 22CV-01414
Tribunal Superior del Estado de California, Condado de Merced

LEA ESTE AVISO DETENIDAMENTE SUS DERECHOS LEGALES PUEDEN VERSE AFECTADOS

Un Tribunal autorizó este aviso de resumen. No es de un abogado y no se le está demandando.

(Una copia de este aviso en español se encuentra inmediatamente después de la versión en inglés).

Todas las personas físicas mencionadas en los registros de Consumer Safety Technology LLC, también conocido como Intoxalock (“Demandado”), que tienen un número de teléfono con un prefijo de California o una dirección de California y que tuvieron una o más conversaciones telefónicas con los representantes de ventas del Demandado en cualquier momento durante el período comprendido entre el 18 de mayo de 2021 y el 8 de febrero de 2022, pueden tener derecho a recibir hasta \$5,000.00 (el “Pago de la Conciliación”) de una conciliación de demanda colectiva (la “Conciliación”) en la demanda antes mencionada (“Demanda”). Esta Conciliación cubre las llamadas antes mencionadas con el Demandado. Lea el aviso completo para obtener más información.

SUS DERECHOS LEGALES Y OPCIONES EN ESTA CONCILIACIÓN

Participar en la Conciliación	Si desea recibir un Pago de la Conciliación, lea este aviso para obtener información sobre cómo presentar un reclamo. Si no presenta un Formulario de Reclamo antes del 12 de marzo de 2025 , no recibirá el Pago de la Conciliación.
Excluirse de la Conciliación	Si no desea participar en la Conciliación, debe enviar una carta solicitando la exclusión que tenga matasellos con una fecha no posterior al 10 de febrero de 2025 o, de lo contrario, estará obligado por la Conciliación y renunciará a cualquier reclamo que pueda tener contra el Demandado en relación con la conducta alegada en la Demanda.
Objetar a la Conciliación	Si desea objetar a la Conciliación, debe seguir las instrucciones de este aviso. La fecha límite para objetar es el 10 de febrero de 2025 . Si presenta una objeción a tiempo a la Conciliación, también puede indicar en la objeción si desea comparecer ante el tribunal y ser escuchado en el momento de la audiencia de equidad final.

No llevar a cabo ninguna acción	Si no lleva a cabo ninguna acción con respecto a este aviso, no recibirá ningún Pago de la Conciliación y estará obligado por los términos de la Conciliación, incluida la exención de reclamos que se describe a continuación.
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ESTOS DERECHOS Y OPCIONES, INCLUIDOS LOS PLAZOS EN LOS QUE DEBE EJERCERLOS, SE EXPLICAN A CONTINUACIÓN

¿De qué se trata el Caso?

En esta Demanda se alega que el Demandado violó la Sección 632.7 del Código Penal de California que prohíbe la grabación de llamadas telefónicas sin previo aviso o consentimiento de las personas que llaman. **El caso cubre las llamadas entre las personas mencionadas en los registros del Demandado que tienen un número de teléfono con un prefijo de California o que tienen una dirección de California y los representantes de ventas del Demandado en cualquier momento durante el período comprendido entre el 18 de mayo de 2021 y el 8 de febrero de 2022 (“Período de la Demanda Colectiva”).**

¿Qué es una Demanda Colectiva?

En una demanda colectiva, una o más personas denominadas Representantes del Colectivo demandan en nombre de personas que tienen reclamos similares a los suyos.

¿Soy Miembro del Colectivo de la Conciliación?

Usted es Miembro del Colectivo de la Conciliación si es una persona que tiene un número de teléfono con un prefijo de California o una dirección de California y que tuvo una conversación telefónica con uno o más representantes de ventas del Demandado durante el Período de la Demanda Colectiva.

El Demandado cuenta con un registro de personas que tienen números de teléfono con un prefijo de California o una dirección de California y que tuvieron una o más conversaciones telefónicas con los representantes de ventas del Demandado durante el Período de la Demanda Colectiva. Si recibió un aviso de esta propuesta de Conciliación por correo postal de los EE. UU., correo electrónico u otro medio, existen registros que indican que usted es Miembro del Colectivo de la Conciliación con derecho a presentar un Formulario de Reclamo. Usted puede ser un Miembro del Colectivo de la Conciliación aunque no haya recibido un aviso por correo postal o correo electrónico de esta propuesta de Conciliación si tuvo una o más conversaciones con los representantes de ventas del Demandado, tal como se describe en el texto en negritas de la sección anterior “¿De qué se trata el Caso?”. Si no está seguro de si califica, puede comunicarse con el Administrador de Reclamos llamando al 1-888-896-7617 o enviando un correo electrónico a info@CallRecordingLawsuit.com para saber si su número o números de teléfono aparecen en la lista de llamadas que califican.

¿Por qué se llega a una Conciliación?

El Demandado niega ser responsable de los reclamos alegados en la Demanda, y el Tribunal no ha fallado a favor de ninguna de las partes. Sin embargo, ambas partes acordaron llegar a una conciliación para evitar la incertidumbre y el costo de más litigios y juicios, así como para brindar beneficios a los Miembros del Colectivo de la Conciliación de forma oportuna. Los términos de la Conciliación se detallan en el Acuerdo de Conciliación y Exención, al que puede acceder a través del Sitio web de la Conciliación, www.CallRecordingLawsuit.com, llamando al 1-888-896-7617, o escribiendo al Administrador de Reclamos a P.O. Box 4235, Baton Rouge, LA 70821.

¿Qué puedo obtener de la Conciliación?

El Demandado acordó crear un Fondo de Conciliación de \$1,747,500.00. Tras la aprobación final de la Conciliación, se deducirán del Fondo de Conciliación los honorarios y costos del aviso y administración de la demanda colectiva, un pago por servicios al Representante del Colectivo, así como los honorarios y costos de los Abogados del Colectivo de la Conciliación. El monto restante en el Fondo de Conciliación después de estas deducciones se pagará a los Miembros del Colectivo de la Conciliación en un monto que se calculará proporcionalmente en función del número de Formularios de Reclamo válidos que presenten los Miembros del Colectivo de la Conciliación, y está sujeto a un límite por persona de \$5,000.00.

El Administrador de Reclamos puede verificar cada número de teléfono que se utilizó durante el Período de la Demanda Colectiva. Si desea información sobre su número de teléfono único o números asociados con su reclamo, puede comunicarse con el Administrador de Reclamos llamando al 1-888-896-7617 o enviando un correo electrónico a info@CallRecordingLawsuit.com.

¿Qué debo hacer para recibir el Pago de la Conciliación?

Debe llenar un Formulario de Reclamo y devolverlo al Administrador de Reclamos dentro del plazo. Hay varias maneras de presentar un Formulario de Reclamo. Puede presentar un Formulario de Reclamo en línea en el Sitio web de la Conciliación, www.CallRecordingLawsuit.com. También puede obtener una copia impresa del Formulario de Reclamo en el Sitio web de la Conciliación, llamando al 1-888-896-7617, o escribiendo al Administrador de Reclamos a P.O. Box 4325, Baton Rouge, LA 70821. Si recibió un aviso por correo electrónico, puede hacer clic en el enlace que se encuentra en el aviso para presentar un Formulario de Reclamo en línea. Si recibió un aviso por correo postal, puede escanear el código QR que se encuentra en el aviso por correo postal para presentar un Formulario de Reclamo en línea, o enviar el Formulario de Reclamo desprendible por correo. Todo Formulario de Reclamo que se envíe por correo deberá llevar matasellos con fecha no posterior al **12 de marzo de 2025**.

Para presentar un Formulario de Reclamo en línea en el Sitio web de la Conciliación, DEBE proporcionar su número de identificación del Reclamo de la Conciliación, el cual puede encontrar en el aviso por correo postal o por correo electrónico que es posible que haya recibido. También puede obtener el número de identificación del Reclamo de la Conciliación requerido comunicándose por teléfono con el Administrador de Reclamos al 1-888-896-7617 o por correo electrónico en info@CallRecordingLawsuit.com. Un Formulario de Reclamo no

se considerará dentro del plazo a menos que se presente en línea o se envíe al Administrador de Reclamos por correo con un matasellos con fecha no posterior al **12 de marzo de 2025**.

¿A qué estoy renunciando para obtener los beneficios de la Conciliación o permanecer en el Colectivo de la Conciliación?

A menos que usted se excluya, como se describe a continuación, permanecerá en el Colectivo de la Conciliación y estará obligado por los términos de la Conciliación y todas las órdenes del Tribunal, independientemente de si presenta o no un Formulario de Reclamo. Esto significa que no puede demandar ni ser parte de ninguna otra demanda contra el Demandado u otras Partes Eximidas (que se definen a continuación) sobre los asuntos de este caso. Permanecer en el Colectivo de la Conciliación también significa que acepta la siguiente exención de reclamos, la cual describe los reclamos legales a los que renuncia:

Exención de reclamos del Colectivo de la Conciliación. A partir de la entrada en vigor de la Orden de Aprobación Final y la Sentencia, se considerará que los Representantes del Colectivo de la Conciliación y cada Miembro del Colectivo de la Conciliación, y sus respectivos herederos, cesionarios, sucesores, agentes, abogados, albaceas y representantes, y en virtud de esta Conciliación y de la Orden de Aprobación Final y la Sentencia, han eximido de forma plena, definitiva, irrevocable y para siempre al Demandado y a sus matrices, filiales y subsidiarias pasadas o presentes, directas e indirectas (sean o no de su propiedad absoluta) y a sus respectivos directores, funcionarios, empleados, agentes, aseguradores, reaseguradores, coaseguradores, accionistas, miembros, abogados, asesores, consultores, representantes, afiliados, contratistas o proveedores externos, compañías relacionadas, empresas conjuntas, divisiones, predecesores, sucesores y cesionarios presentes y anteriores, así como a cada uno de ellos (colectivamente, las “Partes Eximidas”) de todas y cada una de las responsabilidades, reclamos, causas de acción, daños (ya sean reales, compensatorios, estatutarios, punitivos o de cualquier otro tipo), sanciones, costos, honorarios de abogados, pérdidas o demandas, ya sean conocidas o desconocidas, de derecho o de equidad, existentes o sospechadas o insospechadas, que se hayan hecho valer o se podrían haber hecho valer de forma razonable sobre la base de las alegaciones de hecho contenidas en la Queja relacionadas con o derivadas de la supuesta grabación, monitoreo o escucha de llamadas telefónicas con el Demandado desde el 18 de mayo de 2021 hasta el 8 de febrero de 2022 (colectivamente, la “Exención de Reclamos”). Nada de lo aquí dispuesto se interpretará como una renuncia o exención por parte del Demandado de reclamos contra terceros.

¿Cuándo debo recibir mi Pago de la Conciliación?

El Tribunal llevará a cabo una audiencia el 3 de marzo de 2025 a las 8:15 a. m., hora del Pacífico, a fin de decidir si concede la aprobación final para la Conciliación. Si la Conciliación recibe la aprobación final, los pagos podrán realizarse a partir del 16 de junio de 2025; sin embargo, dependiendo de lo que suceda en el caso, podría haber un retraso en los pagos. Puede mantenerse informado sobre el progreso de la Conciliación a través del Sitio web destinado a la Conciliación en www.CallRecordingLawsuit.com. Tenga paciencia. Si el Tribunal niega la aprobación de la Conciliación, no se emitirá ningún Pago de la Conciliación a nadie y la demanda continuará.

¿Puedo excluirme de la Conciliación?

Si desea conservar el derecho a demandar al Demandado o a cualquiera de las Partes Eximidas por su cuenta y a sus expensas sobre los asuntos de este caso, debe tomar las medidas necesarias para excluirse de la Conciliación. A esto también se le denomina “optar por no participar” en la Conciliación. Para excluirse de la Conciliación, debe enviar una carta por correo de primera clase de los Estados Unidos al Administrador de Reclamos, que contenga: (1) el título de la Demanda; (2) su nombre completo, dirección y número de teléfono; (3) una declaración en la que solicite ser excluido de la Conciliación; y (4) los números de teléfono que usted afirma haber utilizado para comunicarse con el Demandado. Asegúrese de incluir su nombre, firma, dirección actual y número de teléfono. Si decide excluirse, su carta de solicitud de exclusión de la Conciliación debe llevar un matasellos con fecha no posterior al **10 de febrero de 2025** y enviarse por correo a:

Intoxalock Claims Administrator
c/o Eisner Amper
P.O. Box 4325
Baton Rouge, LA 70821

Si solicita la exclusión de la Conciliación, no obtendrá ningún beneficio de la Conciliación; no podrá objetar a los términos de la Conciliación; y no estará legalmente obligado por nada de lo que suceda en esta Demanda.

Si no me excluyo, ¿puedo demandar al Demandado por el mismo motivo más adelante?

No. A menos que se excluya, usted renuncia a todo derecho a demandar al Demandado y a cualquiera de las Partes Eximidas por los reclamos que resuelve esta Conciliación. Si tiene una demanda pendiente que cubra estos mismos reclamos, en ese caso, hable con su abogado de inmediato. Debe excluirse de esta Conciliación para continuar con su propia demanda en curso.

¿Cuento con un abogado para este caso?

El Tribunal designó a Mark S. Greenstone y Benjamin N. Donahue de Greenstone Law APC como Abogados del Colectivo de la Conciliación para que les representen a usted y a otros Miembros del Colectivo de la Conciliación. Los Abogados del Colectivo de la Conciliación se pagarán con el Fondo de Conciliación y no se le cobrará por ello de forma separada. Si usted desea que le represente su propio abogado, deberá contratarlo por su cuenta. La información de contacto de los Abogados del Colectivo de la Conciliación es:

Mark S. Greenstone
mgreenstone@greenstonelaw.com
Benjamin N. Donahue
bdonahue@greenstonelaw.com
Greenstone Law APC
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
(310) 201-9156

¿Cómo se pagará a los abogados y a los Representantes del Colectivo?

Los Abogados del Colectivo de la Conciliación solicitarán al Tribunal que apruebe el pago de hasta \$582,500.00 (un tercio del Fondo de Conciliación) en concepto de honorarios de abogados y un monto adicional en concepto de gastos de bolsillo, que se estima no superarán los \$35,000.00. Los honorarios pagarán a los Abogados del Colectivo de la Conciliación por la investigación de los hechos, el litigio del caso, la negociación de la Conciliación y el seguimiento para asegurarse de que se cumplan sus términos. Los Abogados del Colectivo de la Conciliación también solicitarán al Tribunal que apruebe un pago de \$5,000.00 para el Representante del Colectivo por sus servicios como Representante del Colectivo. El Tribunal puede conceder montos inferiores a estos. Estos montos, junto con los costos del aviso y administración de la Conciliación, que se estima no superarán los \$702,000.00, se pagarán con el Fondo de Conciliación.

¿Cómo puedo manifestarle al Tribunal que no estoy conforme con la Conciliación?

Si no está conforme con algún aspecto de la Conciliación, puede comunicárselo al Tribunal presentando una objeción.

Toda objeción a la propuesta de Conciliación debe hacerse por escrito. Todas las objeciones por escrito y los documentos de respaldo deben incluir: (1) un encabezado que contenga el nombre y el número de caso de la Demanda; (2) el nombre y la dirección postal del Miembro del Colectivo de la Conciliación; (3) los números de teléfono con los que el Miembro del Colectivo de la Conciliación se comunicó con el Demandado; (4) una declaración detallada de cada objeción, que incluya, si está disponible, el fundamento de hecho y jurídico de cada objeción; y (5) una declaración en la que se indique si el Miembro del Colectivo de la Conciliación tiene la intención de comparecer, ya sea en persona o a través de un abogado, en la audiencia de aprobación final y, en caso de comparecer a través de un abogado, una declaración en la que se identifique el nombre, la dirección postal, el número de teléfono y la dirección de correo electrónico del abogado. Las objeciones deberán presentarse ante el Tribunal y entregarse por correo de primera clase a los Abogados de las Partes antes del **10 de febrero de 2025**. La fecha del matasellos determinará si una objeción se entregó o no a tiempo.

¿Cuál es la diferencia entre objetar y excluirse?

Objetar es manifestarle al Tribunal que usted no está conforme con algún aspecto de la Conciliación. Puede objetar solo si usted permanece en el Colectivo de la Conciliación. Si objeta, aún deberá presentar a tiempo un Formulario de Reclamo si desea recibir los beneficios de la Conciliación en caso de que se desestime su objeción y se apruebe la Conciliación. Excluirse es manifestarle al Tribunal que no desea formar parte del Colectivo de la Conciliación. Si usted se excluye, no tendrá fundamento para objetar porque el caso ya no le afectará. No puede objetar y excluirse de la Conciliación a la vez. Toda persona que intente tanto objetar como excluirse de la Conciliación se considerará que se ha excluido a sí misma y perderá el derecho a objetar o a participar en la Conciliación o en cualquiera de sus términos. Del mismo modo, no puede optar por no participar y presentar un Formulario de Reclamo a la vez. Si presenta a tiempo un Formulario de Reclamo y una solicitud de exclusión, la solicitud de exclusión se considerará nula y el Formulario de Reclamo se procesará según los términos de la Conciliación.

¿Cuándo y dónde decidirá el Tribunal si aprueba la Conciliación?

El Tribunal llevará a cabo una audiencia de equidad final en relación con la Conciliación a las 8:15 a. m., hora del Pacífico, el 3 de marzo de 2025, en el Tribunal Superior del Condado de Merced, Sala 8, 627 W. 21st Street, Merced, CA 95340. En esta audiencia, el Tribunal determinará si la Conciliación es justa, razonable y adecuada. Si hay objeciones, el Tribunal las considerará. El Tribunal escuchará a las personas que hayan solicitado intervenir en la audiencia. El Tribunal también decidirá cuánto pagar a los Abogados del Colectivo de la Conciliación, al Representante del Colectivo y al Administrador de Reclamos. Además, el Tribunal determinará si es pertinente distribuir los Fondos de la Conciliación restantes al beneficiario designado de cy pres, la Consumer Federation of California. Tras la audiencia, el Tribunal decidirá si aprueba la Conciliación. Los Abogados del Colectivo de la Conciliación desconocen cuánto tiempo tardarán estas decisiones.

La fecha u hora de la audiencia de equidad final puede modificarse sin previo aviso. Cualquier cambio en la fecha u hora de la audiencia de equidad final se publicará en el Sitio web de la Conciliación, www.CallRecordingLawsuit.com.

¿Debo asistir a la audiencia?

No. Los Abogados del Colectivo de la Conciliación responderán las preguntas que el Tribunal pueda tener. No obstante, puede asistir por su cuenta. Si presenta una objeción, no es necesario que comparezca ante el Tribunal para manifestarla. Siempre y cuando presente su objeción por escrito a tiempo, el Tribunal la tendrá en cuenta. También puede hacer que su propio abogado asista por su cuenta, aunque hacerlo no es necesario.

Puede solicitar permiso al Tribunal para presentar cualquier objeción que pueda tener acerca de la Conciliación en la audiencia de equidad final. Para ello, debe presentar una objeción a tiempo e incluir una declaración en la que manifieste su intención de comparecer en la audiencia de equidad final.

¿Qué sucede si no llevo a cabo ninguna acción?

Si no lleva a cabo ninguna acción, es decir, si no presenta un Formulario de Reclamo ni se excluye de la Conciliación, permanecerá en el Colectivo de la Conciliación; estará obligado por los términos de la Conciliación, incluida la Exención de Reclamos, y todas las órdenes del Tribunal; **no** recibirá ningún beneficio de la Conciliación; y no podrá demandar ni ser parte de ninguna otra demanda contra el Demandado o las Partes Eximidas sobre los asuntos de esta Demanda.

¿Hay más información detallada sobre la Conciliación?

En este aviso se resume la propuesta de Conciliación. Para conocer los términos y condiciones precisos de la Conciliación, consulte el Acuerdo de Conciliación y Exención. Puede obtener una copia del Acuerdo de Conciliación y Exención y de otros documentos del caso a través del Sitio web de la Conciliación, www.CallRecordingLawsuit.com, llamando al 1-888-896-7617, o escribiendo al Administrador de Reclamos a P.O. Box 4325, Baton Rouge, LA 70821. También puede comunicarse con los Abogados del Colectivo de la Conciliación.

POR FAVOR, NO LLAME AL TRIBUNAL, A LA OFICINA DEL SECRETARIO DEL TRIBUNAL, AL DEMANDADO NI AL ABOGADO DEL DEMANDADO SI TIENE PREGUNTAS RELACIONADAS CON LA CONCILIACIÓN.

EXHIBIT B
CLAIM FORM
(English and Spanish)

Your Claim Form Must Be Submitted On Or Before March 12, 2025

Claim Forms should be mailed to Intoxalock Claims Administrator, PO Box 4325, Baton Rouge, LA 70821.

Intoxalock Claims Administrator
PO Box 4325
Baton Rouge, LA 70821

Su Formulario de Reclamo debe presentarse a más
tardar el 12 de marzo de 2025

Lisa Haggerty, et al. contra Consumer Safety Technology, LLC

N.º de caso 22CV-01414

(Tribunal Superior del Estado de California del Condado de Merced)

IMPORTANTE: Su reclamo *debe llevar matasellos y enviarse por correo al Administrador de Reclamos a la dirección arriba indicada* antes del **12 de marzo de 2025** para que se considere que es válida y que está dentro del plazo. También puede presentar un reclamo en línea en www.CallRecordingLawsuit.com.

FORMULARIO DE RECLAMO DE LA CONCILIACIÓN

Al llenar y enviar este formulario, usted está presentando un reclamo conforme a los términos del Acuerdo de Conciliación para recibir una parte *proporcional* de la conciliación.

INFORMACIÓN DEL DEMANDANTE (EN LETRA DE IMPRENTA)		
*Nombre		
*Apellido		
*Dirección		
*Ciudad		
*Estado		
*Código postal		
Dirección de correo electrónico actual (obligatoria si seleccionó el pago digital)		
*Seleccione su opción de pago preferida:		
☐ Cheque físico en papel		
☐ Pago digital (dirección de correo electrónico obligatoria)		
Antes del desembolso, se enviará un correo electrónico a la dirección de correo electrónico proporcionada anteriormente, donde podrá seleccionar entre varias opciones de pago digital.		
*Número de identificación del Reclamo de la Conciliación (proporcionado en el aviso de la demanda colectiva)		
*Número de teléfono afectado que se utilizó para comunicarse con Intoxalock		

Certificación

Al firmar este reclamo, certifico que utilicé el número de teléfono afectado mencionado anteriormente para comunicarme con Intoxalock durante el período comprendido entre el 18 de mayo de 2021 y el 8 de febrero de 2022.

*Firma: _____

*Fecha: / /

*Indica la información que debe proporcionar para que su reclamo sea válido
Para obtener más información, visite www.CallRecordingLawsuit.com.

Número gratuito: 1-888-896-7617

Los Formularios de Reclamo deben enviarse por correo a Intoxalock Claims Administrator, PO Box 4325, Baton Rouge, LA 70821.