

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION**

<p>PHT HOLDING II LLC, on behalf of itself and all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>NORTH AMERICAN COMPANY FOR LIFE AND HEALTH INSURANCE,</p> <p style="text-align: right;">Defendant.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Civil Action No. 18-CV-00368</p> <p>Honorable Stephanie M. Rose Honorable Helen C. Adams</p>
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**DECLARATION OF GINA INTREPIDO-BOWDEN REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION EXPENSES AND STATISTICS**

I, Gina M. Intrepido-Bowden, hereby declare as follows:

INTRODUCTION

1. I am a Vice President at JND Legal Administration LLC (“JND”). This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees, and if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation (“Action”) for purposes of administering the Joint Stipulation and Settlement Agreement (“Settlement Agreement”) preliminarily approved by the Court in its Order on Preliminary Approval of Class Action Settlement. Dkt 310.

¹ Capitalized terms used and not otherwise defined herein shall have the meanings given to such term in the Joint Stipulation and Settlement Agreement. Dkt. 309-3.

3. I previously submitted a Declaration regarding the Proposed Settlement Notice Program dated July 17, 2023. Dkt 309-10. This declaration is being filed to report on the Notice and Settlement Administration Expenses that JND has incurred for this matter, to provide an update on JND's estimated remaining Settlement Administration Expenses and to provide settlement statistics.

4. The Notice of Pendency for this Action mailed on November 18, 2022. The administrative fees and expenses JND incurred for the Notice of Pendency was \$31,651.82.

5. Settlement Administration Expenses means all administrative fees and expenses incurred in administering the Settlement, including all expenses related to the Class Settlement Notice and any other fees, or expenses incurred in administering the Settlement. As of September 30, 2023, JND has incurred \$31,601.45 in Settlement Administration Expenses.

6. JND estimates its remaining Settlement Administration Expenses to be approximately \$75,000 - \$90,000, including work in connection with benefit distribution and administration completion.

7. On August 15, 2023, JND mailed the Court approved Postcard Settlement Notice ("Notice") by first class mail to 18,585 Class Members.

8. As of October 15, 2023, of the 18,585 Notices mailed, 255 have been returned as undeliverable. JND conducted advanced address searches and received updated address information for 68 Class Members. JND re-mailed the Notices to the updated addresses accordingly. Additional re-mailings are currently in process.

9. Class Members can exclude themselves from the Settlement by mailing their exclusion requests to the Settlement Administrator postmarked by October 30, 2023. As of October 15, 2023, JND has received one (1) exclusion request.

10. Class Member can object to the Settlement if they file their objection with the Court and send a copy to Class Counsel and Counsel for Defendant by October 30, 2023. As of October 15, 2023, JND has not received any objections. However, JND has been informed that one (1) objection has been filed with the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 16, 2023, at Stone Harbor, NJ.



Gina Intrepido-Bowden