

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler and Jannien Weiner,

Plaintiffs,

vs.

Wells Fargo & Co.; Employee Benefit Review Committee; Wells Fargo Bank, National Association, and John and Jane Does, 1-20,

Defendants.

Case No. 0:20-cv-2016 (KMM/BRT)

**ANALYTICS, LLC SUPPLEMENTAL
DECLARATION**

CLASS ACTION

I, Jeffrey Mitchell, declare and state as follows:

1. I am currently a Project Manager at Analytics Consulting, LLC (hereinafter “Analytics”). The Court approved Analytics as the Settlement Administrator in this matter in its Order on Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement. ECF 256.

2. I previously submitted the “Analytics, LLC Declaration of Jeffrey Mitchell in Support of Plaintiff’s Motion for Attorneys’ Fees, Expense Reimbursements, Settlement Administration Expenses, and Case Contribution Awards” on June 28, 2022. I submit this declaration by request of Plaintiffs’ counsel to provide updated information on the Settlement administration statistics.

Class Notice

3. As of July 26, 2022, 1,678 Notices sent by first-class mail to Class Members

have been returned to Analytics by the U.S. Postal Service with a forwarding address. Analytics updated the class list with the forwarding address and processed a re-mail of the Notice to the updated address.

4. As of July 26, 2022, 8,200 Notices sent by first-class mail were returned to Analytics by the U.S. Postal Service without a forwarding address. Analytics conducted a skip trace in attempt to ascertain a valid address for each affected Class Member. As a result of these efforts, 6,403 new addresses were identified for Class Members. Analytics subsequently updated the class list with these new addresses and processed a re-mail of the applicable Notice to each of those addresses. Of these, 647 Notices were returned by the U.S. Postal Service as undeliverable a second time.

5. In total, out of 575,109 Notices, only 2,444 were ultimately undeliverable as of July 26, 2022, according to Analytics' records, despite Analytics' efforts to verify address information in advance of mailing and to update address information and re-mail the Notices if they were initially returned. Analytics' records accordingly show a Notice delivery success rate of over 99.5%.

Settlement Website, Email Inquiries, and Telephone Information Line

6. From May 25, 2022, to the present, Analytics has maintained a Settlement Website relating to this action. The internet address for this Settlement Website is <https://wellsfargoerisasettlement.com>. As of July 26, 2022, there have been 45,945 unique visitors to this website. Among other things, the Settlement Website includes: (1) a “Frequently Asked Questions” page containing a clear summary of essential case information; (2) a “Home” page and “Important Dates” page, each containing clear notice of applicable deadlines; (3) case and settlement documents for download (including, among other things, the Settlement Agreement, Settlement Notice, Amended Complaint, Plan of Allocation, and the Court’s Preliminary Approval Order); (4) contact information for Class Counsel and the Defendants’ Counsel; (5) email, phone, and U.S. mail contact information for Analytics; and (6) an online former participant rollover form.

7. From May 25, 2022 to the present, Analytics has also maintained a toll-free telephone support line as a resource for Class Members seeking information about the Settlement. The toll-free telephone line employs an interactive voice response system (“IVR system”) to answer calls and provides callers the option of speaking with a live operator if they prefer. The toll-free number for the telephone support line is 1-844-485-2675. This telephone number was referenced in the Settlement Notices and also appears on the Settlement Website. As of July 26, 2022, Analytics has received 3,729 calls related to the Settlement, with 2,304 callers speaking with a Call Center Representative.

8. From May 25, 2022 to the present, Analytics has maintained an email address through which Analytics receives and responds to inquiries for Settlement Class members.

The address is info@wellsfargoerisasettlement.com. As of July 26, 2022, Analytics has received 1,802 emails related to the Settlement.

Rollover Requests

9. As of July 26, 2022, Analytics has received 2,896 rollover requests. Analytics has administered and effectuated a similar Rollover process for other settlements. The number of rollover requests received to date is consistent (as a percentage of the number of Former Participants) with other similar settlements Analytics has administered.

No Objections

10. As of the date of this Declaration, I am not aware of any objections to the Settlement. Nor am I aware of any Class Members expressing concerns with the Settlement.

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 28, 2022

DocuSigned by:

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Jeffrey Mitchell
Project Manager for Analytics Consulting, LLC