

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF KERN - UNLIMITED**

**ELECTRONICALLY FILED
1/4/2018 4:29 PM
Kern County Superior Court**

**FREDERICK C. ANDERSON,
INDIVIDUALLY AND ON BEHALF OF
ALL OTHERS SIMILARLY SITUATED,**

Plaintiff,

v.

**PHOENIX FINANCIAL SERVICES,
LLC; AND, PENDRICK CAPITAL
PARTNERS II, LLC,**

Defendants.

Case No.: BCV-16-101385

Terry McNally
By Geena Taylor, Deputy

HON. SIDNEY P. CHAPIN

AFFIDAVIT OF LONNA B. SCHULZ

STATE OF ILLINOIS, COUNTY OF COOK

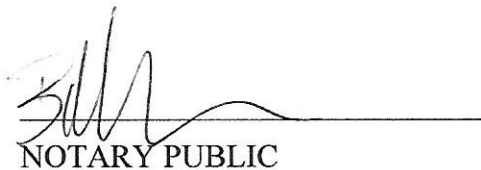
I, Lonna Schulz, under penalty of perjury affirm that the following statements are true:

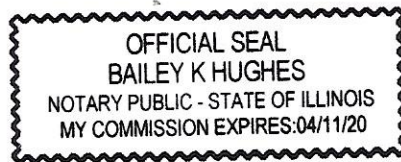
1. I am the President of First Class, Inc. and have personal knowledge of this matter.
2. I am over the age of 18 and am fully competent to make this declaration.
3. First Class, Inc. is a C Corporation, and has been doing business since 1994 and class action work since 1998. The Class Action Division provides in-depth class action administrative services primarily in the areas of Noticing and Settlements.
4. First Class, Inc., a Class Action Administrative Service, has been retained by plaintiff firms, defense firms, and insurance companies across the country to administer hundreds of class action cases since 1998. These cases have been at both Federal and State court levels, and have ranged in size from less than 100 class members to over 1,500,000 class members.
5. First Class, Inc. has been involved with consumer class actions, such as cases alleged to violate the Fair Credit Reporting Act, Fair Debt Collection Practices Act, and similar state laws. The firm has also administered Wage and Hour cases, Civil Rights cases, and a variety of others.
6. For notice mailings, First Class, Inc. will typically check for and remove duplicate entries, and will standardize the mailing addresses of class members by processing the class list through the Coding Accuracy Support System (CASS) and the NCOA (National Change of Address) update process of the U.S. Postal Service, using software certified by the U.S. Postal Service. CASS allows First Class, Inc. to verify the addresses are correctly formatted for delivery, and the NCOA Move Update provides current address information, if available, and information regarding deliverability.

7. For mailings, the class database is maintained to track mailpieces that are returned as undeliverable with no forwarding address or further information provided by the U.S. Postal Service.
8. Mailpieces which are returned to First Class, Inc. with updated address information by the U.S. Postal Service are remailed to the new address, and the class database is updated.
9. Any objections or requests for exclusion, if received, are forwarded to counsel for review and noted in the class database.
10. First Class, Inc. has substantial experience in processing claim forms where analysis of the claim form is required.
11. For distribution of settlement checks, First Class, Inc. is experienced with Settlement Fund requirements and offers secure "Positive Pay" services whereby the bank is notified about checks issued, and will alert First Class Inc. if a check is cashed that is not issued, or if a check is attempted to be cashed more than once.

FURTHER AFFIANT SAYETH NOT.


AFFIANT


NOTARY PUBLIC



SWORN TO AND SUBSCRIBED before me this
4th day of January, 2018 by Lonna B. Schulz,
President of First Class, Inc.