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22 **DISTRIBUTION, LLC; HEARX WEST, INC.;**
23 **and HEARX WEST LLC**

24 **UNITED STATES DISTRICT COURT**
25 **CENTRAL DISTRICT OF CALIFORNIA**

26 IA BROWN, an individual, on behalf of
27 herself, all others similarly situated, and
28 the general public,

Plaintiff,

v.

AUDIOLOGY DISTRIBUTION, LLC, a
Delaware limited liability company;
CRAIG CAMERON, an individual;
HEARX WEST, INC., A California
corporation; STEVE MAHON, an
individual; TINO SCHWEIGHOEFER, an
individual; HEARX WEST LLC, a
Delaware limited liability company; WS
AUDIOLOGY (CALIFORNIA), PC, A
California professional corporation;
SIVANTOS, INC., a Delaware
corporation; and DOES 1 to 100,
inclusive,

Defendants.

CASE NO.: 2:22-cv-04271-DMG-MRW

**DECLARATION OF JEREMY
TALAVERA ON BEHALF OF CPT
GROUP, INC.**

DATE: December 6, 2024

TIME: 10:00 AM

LOCATION: Courtroom 8C, 8th Floor

Case Filed: June 22, 2022

DECLARATION OF JEREMY TALAVERA

1
2 1. I am a Case Manager at CPT Group, Inc. (“CPT”), the Court-approved class
3 action settlement administrator, for the *Brown v. Audiology Distribution, LLC*, settlement. I have
4 personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and
5 would testify competently thereto.

6 2. On August 23, 2024, CPT mailed Notice Packets to 1,435 Class Members via
7 regular First-Class U.S. Mail, using the most current, known mailing addresses available. The
8 Notice Packets advised Class Members the Response Deadline was October 7, 2024.

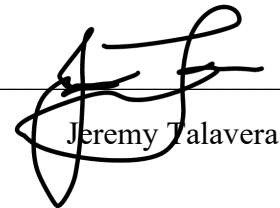
9 3. Out of the 1,435 Class Members, 1,029 are FLSA sub-class members.

10 4. As of the date of this declaration, CPT has not received any valid and timely
11 Requests for Exclusion from the Settlement.

12 5. As of the date of this declaration, there are 81 Class Members who submitted a
13 timely and valid Opt In form. To date, CPT reports a 7.87% participation rate within the FLSA
14 sub-class.

15 6. As of the date of this declaration, the average settlement payment to Class
16 Members is \$797.91, and the highest estimated settlement payment to a Class Member is
17 \$15,838.98.

18
19 I declare under penalty of perjury under the laws of the United States and the State of
20 California that the foregoing is true and correct and that this declaration is executed on this 23rd
21 of September, 2024, at Irvine, California.

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Jeremy Talavera

CERTIFICATE OF SERVICE

I, Paul T. Cullen, certify and declare as follow:

I am over the age of 18 and not a party to this action.

My business address is 9800 Topanga Canyon Boulevard; Suite D, PMB 325; Chatsworth, CA 91311-4057.

On September 23, 2024, I caused a copy of the following document:

**DECLARATION OF JEREMY TALAVERA
ON BEHALF OF CPT GROUP, INC.**

to be served upon the following counsel via the Court's CM/ECF system:

YURI MIKULKA (State Bar No. 185926)

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Attorneys for DEFENDANTS AUDIOLOGY DISTRIBUTION,
LLC; HEARX WEST, INC.; and HEARX WEST LLC

I declare under penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made. Executed on September 23, 2024, at Los Angeles, California.

/s/ Paul T. Cullen

Attorneys for Plaintiff IA BROWN