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11 *Attorneys for Plaintiff and the Putative Class*

12
13 **UNITED STATES DISTRICT COURT**
14 **EASTERN DISTRICT OF WASHINGTON**

15 Nathan Hofstader and Richard
16 Cerenzia, individually and on behalf of
17 others similarly situated,

18 **Plaintiffs,**

19
20 **v.**

21 Emergency Physician Services, P.S.,
22 Providence Holy Family Hospital,
23 Sacred Heart Medical Center, and
24 Providence Health
and Services,

25 **Defendants.**

Case No: 2:18-cv-00062-SMJ

Assigned to the Honorable
Salvador Mendoza Jr.

**DECLARATION OF STEPHANIE
MOLINA IN SUPPORT OF PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: February 9, 2021
Time: 1:30 p.m.
Courtroom: 755

1 I, Stephanie Molina, declare as follows:

2 1. I am the Operations Manager for ILYM Group, Inc. (herein after referred to
3 as “ILYM Group”), the professional settlement services provider who has been retained
4 by Plaintiffs’ Counsel and subsequently appointed by the Court to serve as the
5 settlement administrator for the *Hofstader v. Emergency Physician Services, P.S., et al.*
6 matter. The following statements are based on my own personal knowledge and
7 information provided by other ILYM Group employees working under my supervision
8 and, if called upon to testify, I could and would testify competently to such facts.

9 2. ILYM Group has extensive experience in administering Class Action
10 Settlements, including direct mail services, telephone and web-based support, database
11 management, claims processing and settlement fund distribution services for Class
12 Actions. Pursuant to the Class Action Settlement Agreement for this matter, ILYM
13 Group was/is responsible for: (a) publishing online banner ads and a text and image ad
14 display campaign; (d) creating and hosting a dedicated website to provide Settlement
15 Class Members with easy and immediate access to information regarding the proposed
16 Settlement, and to allow Settlement Class Members to opt-out of the Settlement
17 electronically; (e) setting up and maintaining a toll-free automated telephone support
18 system; (f) fielding inquiries about the settlement; (i) processing requests for exclusions
19 and objections to the Settlement; and (l) performing other tasks as the Parties mutually
20 agree to and/or the Court ordered ILYM Group to perform.

21 3. On September 12, 2020, ILYM Group established the dedicated Settlement
22 website, <https://providencehealthsettlement.com> to provide easy and immediate access to
23 information regarding the proposed Settlement and to allow Settlement Class Members
24 to opt-out of the Settlement electronically. A copy of the Preliminary Approval of Class
25 Settlement, the Class Action Settlement Agreement, the Notice of Proposed Class
26 Action Settlement, and other relevant documents were posted on said website.

27 4. On September 12, 2020, ILYM Group implemented the Targeted Campaign
28 Banner by placing targeted banner ads on Google and various social media outlets

1 directed at Washington residents. Each time the banner ads were shown on Google and
2 social media outlets, an impression was counted. The Targeted Campaign Banner made
3 five million (5,000,000) impressions targeted towards those Washington Residents.

4 5. As of the date of this declaration, ILYM Group has received 5 requests for
5 exclusion from the Settlement. The names of the people who excluded themselves from
6 the settlement are attached to this declaration as "Exhibit A". The deadline to request
7 exclusion from the Settlement is November 23, 2020.

8 6. As of the date of this declaration, ILYM Group has not received any
9 objections to the Settlement. The deadline to object to the Settlement is November 23,
10 2020.

11 7. ILYM Group will incur an estimated \$12,000.00 in costs, associated with
12 the administration of this settlement. This will include all costs incurred to date, as well
13 as estimated costs involved in completing the settlement administration.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed
15 this 9th day of November 2020, at Tustin, California.

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18 

19 _____
20 STEPHANIE MOLINA
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EXHIBIT “A”

Angela Faucett

Latoya Minnifield

Asher Rivera

Ignacio Stephens

Heather Taylor