

DECLARATION

Comes now KENNETH JUE, and being first duly sworn, states as follows:

1. My name is Kenneth Jue, Senior Projects Manager at Kurtzman Carson Consultants ("KCC").

2. KCC is the Settlement Administrator selected by Class Counsel and approved by the Court to carry out the functions required by § VIII.D.4. of the Final Settlement Agreement ("FSA") (Doc. 1331). I am responsible for supervising the settlement administration services provided by KCC.

3. One of the tasks that the Settlement Administrator is charged with carrying out is the proper calculation of the claim form amounts and the payment amounts in accordance with the requirements of the FSA.

4. A methodology (and calculations generated by that methodology) for determination of Class Member Claim Form amounts and payment amounts has been developed by Class Counsel and government counsel. That methodology takes into account the Treasury Department payments to the Class, together with post-judgment interest, and factors in the impact of offsets pursuant to the Treasury Offset Program per §§ II.V. and VIII.C. of the FSA, and deductions for the Reserve Account, attorneys' fees and litigation costs as there provided, all as shown on Exhibit A to Plaintiff's Unopposed Motion for Approval of the Reserve Account Amount, the Holdback Amount, the Payment of Costs and Fees to Class Counsel, and

the Final Claim Form and Payment Amounts for Class Members. That methodology conforms to the requirements of the FSA.

5. We have confirmed that the methodology and calculations reflected in the spreadsheets appended as Exhibits B and C to the parties' Unopposed Motion are consistent with the requirements of the FSA as interpreted by the parties and that the share percentages, Claim Form amounts, and payment amounts shown for all Class Members are accurate, although they reflect miniscule, non-material variations attributable to unavoidable rounding adjustments. We have also confirmed that the reduced payment amounts shown for the Reserve Account, litigation costs award and attorneys' fees as shown on those spreadsheets are accurate, subject to the same rounding adjustment observation.

6. We have not independently verified the Judgment Fund principal and interest payment amounts, the funds transfer amounts received by the Class' designated bank (with interest), or the total Treasury offset deduction amounts of \$518,773.86, as shown on Exhibit A to the said Unopposed Motion. We have accepted those amounts as the starting point for our verification of the calculations set out on Exhibits B and C thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed this 12th day of August, 2016, at San Rafael, California.



KENNETH JUE

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