

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

PRECISION ASSOCIATES, INC., *et al.*, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

PANALPINA WORLD TRANSPORT  
(HOLDING) LTD., *et al.*,

Defendants.

No. 08-CV-00042 (JG) (VVP)

**DECLARATION OF JULIE REDELL**

I, Julie Redell, hereby declare as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions (“Epiq”) in Beaverton, Oregon. I am familiar with the actions taken by Epiq with respect to the settlements reached in this case thus far and the corresponding proposed class notice program. This declaration is based upon my personal knowledge and information provided to me by counsel for the plaintiffs and associates and staff under my supervision and is accurate and truthful to the best of my knowledge.

2. Epiq is a full-service data processing company and has been administering bankruptcies since 1985 and settlements since 1993, including settlements of class actions, mass tort matters, SEC and FTC disgorgement actions, and other major litigation. Our associates include technology experts, attorneys, paralegals, MBAs, and CPAs. Epiq has administered more than 1,000 settlements in some of the largest and most complex cases ever settled, including antitrust class actions. Epiq was appointed Settlement Administrator for the following cases, among others: *Microsoft State Antitrust Settlements* (16 different state Settlements), *In Re: International Air Transportation Surcharge Antitrust Litigation*, United States District Court,

Northern District of California, Case No. M:06-cv-01793-CRB, MDL No. 1793; *In Re: Puerto Rican Cabotage (DRD) Antitrust Litigation*, United States District Court, District of Puerto Rico, Master Document No. 3:08-MD-1960; *In Re: Flat Glass Antitrust Litigation (II)*, United States District Court, Western District of Pennsylvania, Master Docket Misc. No. 08:180 (DWA), MDL No. 1942; *Norvir Antitrust Litigation*, United States District Court, Northern District of California, Case No. C 07-5985 CW; and *In Re: Lorazepam and Clorazepate Antitrust Litigation*, United States District Court, District of Columbia, MDL Docket No. 1290.

3. Epiq has handled the direct mailing of Notices and related documents in a number of large international matters where class members reside in foreign countries. These cases include *In Re: International Air Transportation Surcharge Antitrust Litigation*, United States District Court, Northern District of California, Case No. M:06-cv-01793-CRB, MDL No. 1793; *In re: Parmalat Securities Litigation*, United States District Court, Southern District of New York, MDL No. 1653; and the *Royal Dutch Shell Non-United States Residents Securities* class action settlement under the supervision of the Amsterdam Court of Appeals, Case No. 10610887.

4. As described above, Epiq is a firm with more than 20 years of experience in data processing, claims processing, and settlement administration. Epiq's class action case administration services include coordination of all notice requirements, design of direct-mail notice, receipt and processing of opt-outs by potential class members, coordination with the United States Postal Service, claims database management, claim adjudication, fund management, and distribution services. Epiq works with the settling parties, the Court, and the settlement class members in a neutral facilitation role, taking the negotiated terms of a settlement and implementing settlement administration services.

## OVERVIEW OF EPIQ'S RESPONSIBILITIES IN THIS CASE

5. Epiq's responsibilities in connection with these settlements include:

(a) printing the Court-approved Notice to be mailed to potential Class Members;

(b) searching the National Change of Address ("NCOA") database for a current address for each potential Class Member;

(c) mailing the Notice Packet (which included a Summary Notice and Claim Form) and, when updated addresses are provided by the United States Postal Service ("USPS") via postal forward information or when we receive updated mailing addresses from the postal system in foreign countries, re-mailing the Notice Packet to potential Class Members;

(d) establishing and maintaining a toll-free number with an Interactive Voice Response ("IVR"), which provides an automated recorded message and answers to frequently asked questions, the ability to request a Notice Packet or leave a message for the Administrator, recorded in four languages (English, Japanese, Mandarin and Cantonese) and is staffed with multi-lingual agents available to answer questions from class members. On March 21, 2013, Epiq recorded and launched its IVR in four languages on the following dedicated toll-free phone number for this matter: (877) 276-7340; and

(e) establishing and maintaining an informational website, which provides potential Class Members access to detailed settlement information, including, but not limited to, access to settlement and Court documents, a summary of important dates and deadlines, answers to frequently asked questions and contact information for the Settlement Administrator. Important portions of the website have been translated into four languages (English, Japanese, Simplified Chinese and Traditional Chinese). The website allows potential class members to complete and file their Claim Form online via one of the above four languages/dialects. In addition, Epiq is

staffed to handle email and correspondence in the four languages. On March 21, 2013, Epiq launched the informational website at [www.freightforwardcase.com](http://www.freightforwardcase.com).

#### **MAILING OF THE NOTICE AND CLAIM FORM**

6. Epiq is responsible for causing the Notice Packet to be mailed to the last known address of each reasonably identifiable potential Class Member. The last known addresses of potential Class Members were derived from Defendants' purchasing data and provided to Plaintiffs and Epiq pursuant to settlement agreements and orders of the Court. Between March 21 and March 29, 2013, Epiq mailed 2,323,671 Notice Packets to all potential Class Members.

7. Of these 2,323,671 initial Notice Packets, 481,282 were returned as "undeliverable" by the U.S. Postal Service. Epiq has received alternative address information and re-mailed the Notice Packets for 154,394 of these class members.

#### **OBJECTION, EXCLUSION REQUESTS AND CLAIM FORMS**

8. The Notice Packet initially mailed to the class members provided a deadline of June 25, 2013 for class members to exclude themselves from the settlement by mailing a timely and complete request for exclusion. As of July 26, 2013, Epiq received 183 requests for exclusion, some of which are duplicates.

9. The Notice Packet initially mailed to the class members provided a deadline of June 25, 2013 for class members to object to the settlement. As of July 26, 2013, Epiq had not received any objections.

10. As of July 19, 2013, Epiq has received 2,062 Claim Forms.

#### **INFORMATION CENTER AND TELEPHONE SUPPORT**

11. As provided in the Stipulation of Settlement and directed by the Court, an Internet website was established and maintained by Epiq. The Internet website,

www.freightforwardcase.com, contains extensive information and materials pertaining to the settlement and provides potential Class Members access to detailed settlement information, including, but not limited to, access to settlement and Court documents, a summary of important dates and deadlines, answers to frequently asked questions and contact information for the Settlement Administrator. Important portions of the website have been translated into four languages (English, Japanese, Simplified Chinese and Traditional Chinese). The website allows potential class members to complete and file their Claim Form online via one of the above four dialects. In addition, Epiq is staffed to handle email and correspondence in the four languages. The website also includes a list of the key deadlines and dates. As of July 19, 2013, Epiq has received 2,076,043 hits to the website. The website will remain in service through the end of the settlement administration, and will be updated as necessary.

12. The toll-free telephone line, Toll-Free 1-877-276-7340 and International (Toll) 1-503-520-4400, is a 24-hour automated service that provides information regarding the settlement and answers to frequently asked questions as well as providing callers with the option to request that a claim package, which includes a claim form and a long form notice, be mailed to them. The toll-free line also provided callers with an option to leave a message for the Administrator. As of July 19, 2013, Epiq has received 7,842 calls to the telephone line and 2,851 outbound callbacks have been placed. This telephone line will be available through the end of the settlement administration, and will be updated as necessary.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 26, 2013 in Beaverton, Oregon.

  
JULIE REDELL