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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES - CENTRAL DISTRICT**

10 ADAM HOFFMAN and SAMUEL JASON,
11 Individually and on Behalf of All Others
Similarly Situated,

12 Plaintiffs,

13
14 v.

15 CITY OF LOS ANGELES,

16 Defendant.

Case No. BC672326

**FINAL REPORT OF
ERIC NORDSKOG REGARDING
DISTRIBUTION OF THE NET
SETTLEMENT FUND**

Assigned for All Purposes to: Hon. Theresa M.
Traber

Dept: SSC-1
Action Filed: August 15, 2017

1 I, Eric Nordskog, declare as follows:

2 1. I am a Client Services Director with A.B. Data, Ltd. (“A.B. Data”).¹ The following
3 statements are based on my personal knowledge and information provided by other A.B. Data employees
4 working under my supervision, and if called on to do so, I could and would testify competently thereto.

5 2. Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for
6 Notice dated June 12, 2023, A.B. Data was authorized to function as the Claims Administrator in
7 connection with the Settlement of the above-captioned action (the “Action”).

8 3. On August 13, 2024, the Court granted Plaintiffs’ Unopposed Motion for Class
9 Distribution Order (the “Distribution Order”) directing A.B. Data to distribute the Net Settlement Fund
10 in accordance with the Distribution Plan set forth in my declaration in support of Plaintiffs’ Unopposed
11 Motion for Class Distribution Order dated May 16, 2024. I submit this Final Report to provide the Court
12 and the Parties to the Action with updated information regarding the distribution of the Net Settlement
13 Fund to the Settlement Class.

14 **INITIAL DISTRIBUTION**

15 4. The Distribution Order approved payment of the Net Settlement Fund to Authorized
16 Claimants on a *pro rata* basis after deducting any Court-approved fees and expenses related to the
17 administration of the Settlement and excluding Claims that would receive a payment of less than \$10.00.

18 5. Beginning on October 22, 2024, A.B. Data sent payments totaling \$38,726,496.45 to
19 499,517 Authorized Claimants (the “Initial Distribution”). Payment amounts for the Authorized
20 Claimants ranged from \$10.00 to \$14,109.10, and the average payment was \$77.53. Authorized
21 Claimants were provided with a 90-day period to deposit their checks before they became void. All
22 payments included A.B. Data’s contact information in the event an Authorized Claimant had questions
23 or needed their check reissued due to a name change or some other issue.

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¹ All capitalized terms that are not otherwise defined herein shall have the meanings ascribed to them in
27 the First Amended Stipulation and Agreement of Settlement, dated May 30, 2023, attached as Exhibit 1
28 to the Supplemental Declaration of Jonathan M. Rotter in Support of Plaintiffs’ Unopposed Motion for
Preliminary Approval of Class Action Settlement, filed on May 30, 2023.

6. In an effort to maximize the number of Authorized Claimants able to participate in the distribution, A.B. Data issued replacement checks to certain Authorized Claimants who had not cashed their checks as of the void date and had requested a reissued check. Additionally, A.B. Data conducted advance address research utilizing a third-party subscription service in an attempt to obtain updated addresses for checks that were returned as undeliverable by the United States Postal Service.

7. At the conclusion of the Initial Distribution, 376,720 payments totaling \$30,534,287.84 had been cashed. After all reasonable efforts to encourage Authorized Claimants to cash their checks had been exhausted, the remaining balance in the Net Settlement Fund was \$8,192,208.61.

SECOND DISTRIBUTION

8. Pursuant to the Distribution Order, A.B. Data, in consultation with Plaintiffs' Counsel, determined it was cost-effective to conduct a re-distribution of the Net Settlement Fund (the "Second Distribution") to all Authorized Claimants in the Initial Distribution who cashed their distribution checks and would receive at least \$10.00 from the Second Distribution. After deducting \$375,000 for A.B. Data's fees and costs associated with performing the Second Distribution, approximately \$7,660,000 remained in the Net Settlement Fund for the Second Distribution. In addition, A.B. Data and Plaintiffs' Counsel agreed to set aside approximately \$150,000 in reserve to address any subsequent requests from Authorized Claimants to reissue uncashed checks from the Initial Distribution.

9. On June 11, 2025, 286,789 payments, totaling \$7,659,996.74, were mailed to Authorized Claimants who cashed their Initial Distribution settlement checks and who were eligible to receive a payment of \$10.00 or more.

10. Authorized Claimants cashed 221,741 Second Distribution payments totaling \$6,070,070.74, and 588 Initial Distribution reissue payments totaling \$57,941.71.

11. At the conclusion of the Second Distribution, \$1,764,393.66 remained in the Net Settlement Fund, consisting of \$1,589,926.00 from the Second Distribution, \$99,811.66 from the reserve, and \$74,656.00 from a federal tax refund.

1 **THIRD DISTRIBUTION**

2 12. Pursuant to the Distribution Order, A.B. Data, in consultation with Plaintiffs' Counsel,
3 determined it was cost-effective to conduct a second re-distribution of the Net Settlement Fund (the
4 "Third Distribution") to all Authorized Claimants in the Second Distribution who cashed their
5 distribution checks and would receive at least \$10.00 from the Third Distribution. After deducting
6 \$89,191.00 for A.B. Data's fees and costs associated with performing the Third Distribution,
7 approximately \$1,575,202.66 remained in the Net Settlement Fund for the Third Distribution. In
8 addition, A.B. Data and Plaintiffs' Counsel agreed to set aside \$100,000 in reserve to address any
9 subsequent requests from Authorized Claimants to reissue uncashed checks from the Initial and Second
10 Distributions.

11 13. On October 21, 2025, 39,043 payments, totaling \$1,575,202.57, were mailed to
12 Authorized Claimants who cashed their Initial and Second Distribution settlement checks and who were
13 eligible to receive a payment of \$10.00 or more.

14 14. All remaining uncashed checks were voided on February 27, 2026.

15 **FOURTH DISTRIBUTION**

16 15. Pursuant to the Distribution Order, A.B. Data, in consultation with Plaintiffs' Counsel,
17 determined it was cost-effective to conduct a third re-distribution of the Net Settlement Fund (the
18 "Fourth Distribution") to all Authorized Claimants in the Third Distribution who cashed their
19 distribution checks and would receive at least \$10.00 from the Fourth Distribution. After deducting
20 \$32,898.00 for A.B. Data's fees and costs associated with performing the Fourth Distribution,
21 approximately \$237,873.29 remained in the Net Settlement Fund for the Fourth Distribution.

22 16. On April 13, 2026, 2,997 payments, totaling \$237,873.19, were mailed to Authorized
23 Claimants who cashed their Initial, Second, and Third Distribution settlement checks and who were
24 eligible to receive a payment of \$10.00 or more.

25 17. Authorized Claimants cashed 2,727 Fourth Distribution payments totaling \$221,817.32.
26 As of the date of this Declaration, \$16,055.87 remains in the Net Settlement Fund. All remaining
27 uncashed checks were voided on September 2, 2026.

18. Given the amount of remaining funds, A.B. Data and Plaintiffs' Counsel do not believe an additional re-distribution of the Net Settlement Fund is economically feasible.

NOTICE AND ADMINISTRATION COSTS

19. Total Notice and Administration Costs, including all cost related to the four distributions, equal \$1,390,521.02.

CONCLUSION

20. The remaining balance of the Net Settlement Fund will be distributed in equal amounts to Heal the Bay and LA Waterkeeper. Heal the Bay and LA Waterkeeper were approved as *cy pres* recipients in the Distribution Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of September 2026.

Er A. Novakof

ERIC NORDSKOG

PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On September 28, 2026, I served true and correct copies of the foregoing document, by posting the document electronically to One Legal File&Serve, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 28, 2026.

s/ Jonathan M. Rotter
Jonathan M. Rotter