

February 07 2024 4:21 PM

CONSTANCE R. WHITE
COUNTY CLERK
NO: 21-2-08744-4

The Honorable Thomas Patrick Quinlan

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY

JULI ANN BENJAMIN, CHERYL
RETHAFORD, and LAURA BRADLEY, on
behalf of themselves and all others similarly
situated,

Plaintiff,

v.

COLUMBIA STATE BANK, a Washington
Bank Corporation, d/b/a Columbia Bank,

Defendant.

NO. 21-2-08744-4

DECLARATION OF ROBERT HYTE

I, ROBERT HYTE, declare as follows:

1. I am the director of Operations at Settlement Services, Inc. ("SSI"). The following statements are based on my personal knowledge and information provided by other SSI employees working under my supervision, and, if called on to do so, I could and would testify competently thereto.

2. SSI is serving in this matter as the Settlement Administrator in the Action for the purposes of administering the Settlement Agreement and Release, preliminarily approved in the Court's Order dated November 9, 2023. I submit this Declaration in order to provide the Court and the Parties to this Action with information regarding the dissemination of the Notice of Pending Class Action and Proposed Settlement ("Notice"), processed in accordance with the

1 Court's Order.

2 3. **Class Data.** On November 11, 2023, Class Counsel provided SSI with a
3 spreadsheet, (the "Class List") which included Last 4 Digits of Account Number, Customer
4 Name, Date Opened, Date Closed, Address, Email Address, Enrolled in Online Banking?, and
5 Customer Has Active Account? for fourteen thousand three hundred forty-four (14,344) Class
6 Members. On November 13, 2023, Class Counsel provided an additional spreadsheet which
7 included the Fees Paid Data.

8 4. **NCOA.** In order to obtain the most current mailing address for Class Members,
9 SSI processed the Class List addresses through the National Change of Address ("NCOA")
10 database maintained by the United States Postal Service ("USPS"). This process updates
11 addresses for individuals who have moved within the last four years and who filed a change of
12 address card with the USPS.

13 5. **Website and Phone Support.** On December 8, 2023 (the "Notice Date"), SSI
14 made live a settlement website at <https://www.csbsettlement.com/> and began answering Class
15 Member phone calls, toll-free, at (833) 419-0965. As per the Settlement Agreement, a copy of
16 the Long Form Notice is posted on the settlement website.

17 6. **Email Notice.** On December 8, 2023 (the "Notice Date"), SSI emailed the Notice
18 to three thousand two hundred ninety-four (3,294) Class Members with a current account who
19 enrolled in Email receipt of their bank documents.

20 7. **Undeliverable Email.** As of this date, a total of thirty-four (34) emailed Notices
21 have been returned to SSI.

22 8. **Postcard Notice.** On December 8, 2023 (the "Notice Date"), SSI mailed the
23 Postcard Notice by first-class mail, postage prepaid, from Tallahassee, Florida, to the fourteen
24 thousand three hundred forty-four (14,344) Class Members on the Class List.

25 9. **Undeliverable Mail.** As of this date, a total of two thousand three hundred four
26 (2,304) Postcard Notices have been returned to SSI by the USPS as undeliverable without
27

1 forwarding address information. SSI conducted a locator trace for each individual with a returned
2 Postcard Notice to the postmark deadline, and possible new addresses were obtained for one
3 thousand three hundred fifty-eight (1,358) of them. SSI re-mailed Postcard Notices to these
4 possible new addresses. We were unable to find a new address for nine hundred twenty-five (925)
5 returned undeliverable Postcard Notices. In addition, two hundred fifty-three (253) of the
6 remailed Postcard Notices to trace addresses were returned undeliverable.

7 **10. Remail by Request.** No (0) Postcard Notices were re-mailed at the request of
8 either Class Counsel or the Class Member.

9 **11. Remail to PO Forward.** Twenty-four (24) Postcard Notice were re-mailed to a
10 PO forwarding address provided by the USPS.

11 **12. Requests for Exclusion.** The deadline for Class Members to exclude themselves
12 from the Class was a postmark deadline of January 8, 2024. As of the date of this declaration,
13 SSI has received no (0) requests for exclusion, timely or otherwise.

14 **13. Objections.** The deadline for Class Members to object to the Settlement was a
15 postmark deadline of February 22, 2024. As of the date of this declaration, SSI has received one
16 (1) objection from Petr L. Budey. A copy of the Objection is attached as Exhibit A.

17 **14. Settlement Administration Fees.** To date, SSI has incurred a total of \$22,542.72
18 in settlement administration fees based on approximately 128.5 hours of work. This does not
19 include the significant settlement administration work that still needs to be completed in this case
20 including, for example, mailing and re-mailing settlement checks, responding to Class Member
21 inquiries, and filing tax returns for the settlement fund.

22 I declare under penalty of perjury of the laws of the state of Washington that the
23 foregoing is true and correct.

24 Executed on this 7th day of February 2024, in Tallahassee, Florida.

25
26 
27 Robert Hyte

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2024, a copy of the foregoing *DECLARATION OF ROBERT HYTE* was served on counsel at the following address by the methods indicated:

Counsel for Defendant KC Hovda, WSBA #51291 Zachary A. Cooper, WSBA #53526 MILLER NASH LLP 605 5 th Ave. S., Suite 900 Seattle, Washington 98104 Phone No.: 206.624.8300 Facsimile: 206.340.9599 KC.Hovda@MillerNash.com zachary.cooper@millernash.com	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Legal Messenger <input type="checkbox"/> Fax <input checked="" type="checkbox"/> PCSC E-Service/Email
--	---

I declare under penalty of perjury under the laws of the state of Washington and the United States that the foregoing is true and correct.

Executed this 7th day of February, 2024, at Seattle, Washington.

s/ Andrea Toll
Andrea Toll, Legal Assistant

EXHIBIT A

Petr Budey/Natalia Budey

12/20/23

[REDACTED]

Account number: [REDACTED]

Email: [REDACTED]

Phone number [REDACTED]

Re: Objection to Settlement in Cheryl Rethaford v. Columbia State Bank Class Action

Dear, whomever this may concern,

I am writing to formally object to the proposed settlement in the Cheryl Rethaford v. Columbia State Bank class action. My intention to object is based on the following grounds:

I do not intend to appear at the Final Approval Hearing, either in person but if needed I can contact through counsel.

I do not plan to call the following witnesses to testify at the Final Approval Hearing in support of my objection:

I understand that my objection must be received by 02/22/24 and I am sending this objection via mail. Please consider this letter as my formal objection to the proposed settlement.

Thank you for your attention to this matter.

Sincerely,



Petr Budey



Natalia Budey

ISS
DEC 29 2023
RECEIVED



Natalia Budey
 14050 SE 180th Ave
 Damascus, OR 97089

RECEIVED
 DEC 6 2 2023
 SSI

Portland, OR
 Cheryl Rethford
 21 DEC 2023 PM 1
 Columbia State Bank
 c/o Settlement Services, Inc
 P.O. Box 10269
 Tallahassee, FL 32302-2269



32302-226969

