

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE ANIMATION WORKERS ANTITRUST
LITIGATION

Master Docket No. 14-CV-4062-LHK

DECLARATION OF KENNETH JUE IN
SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT WITH BLUE SKY
STUDIOS, INC.

THIS DOCUMENT RELATES TO:

ALL ACTIONS

1. I am employed as a senior project manager of the Class Action Group at Kurtzman Carson Consultants (“KCC”). In 2015, Gilardi & Co. LLC (“Gilardi”), merged with KCC. Gilardi was one of the largest full-service class action notice and claims administrators in the country. Gilardi specialized in designing, developing, analyzing and implementing legal notification plans and claims administration that supports due process. During the past 26 years Gilardi administered class notices and class settlements in over 3,500 cases, and has distributed more than \$20 billion in assets. Since 2000, KCC (along with Rosenthal & Company, which was acquired by KCC in 2010) has been retained to administer more than 1,500 class actions. As part of these class actions, KCC has provided noticing solutions in cases with class members that range in numbers from 22 to over 22 million, and has distributed settlement payments totaling well over two billion dollars in the aggregate.

2. In March of 2015, Gilardi was appointed the Settlement Administrator in the *In re: High-Tech Employee Antitrust Litigation*. I was the senior project manager overseeing the administration of the *High Tech* matter. In the course of its duties, Gilardi mailed 66,016 notices and distributed 65,726 checks totaling over \$308 million net. Notice was estimated to reach approximately 99% of the class and over 88% of the settlement checks have been cashed.

3. It is our understanding the Class Counsel will be requesting the following information on the Class Members in their proposed preliminary approval order:

Within twenty (20) days after the date of the Preliminary Approval order, the defendants shall provide to the Claims Administrator in an electronic format for the following time periods:

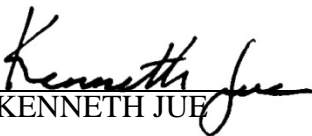
- Pixar (Jan. 1, 2001 – Dec. 31, 2010)
- Lucasfilm Ltd., LLC (Jan. 1, 2001 – Dec. 31, 2010)
- DreamWorks Animation SKG, Inc. (Jan. 1, 2003 – Dec. 31, 2010)
- The Walt Disney Company (Jan. 1, 2004 – Dec. 31, 2010)
- Sony Pictures Animation, Inc. and Sony Pictures Imageworks, Inc. (Jan. 1, 2004 – Dec. 31, 2010)
- Blue Sky Studios, Inc. (Jan. 1, 2005 – Dec. 31, 2010)
- Two Pic MC LLC f/k/a ImageMovers Digital LLC (Jan. 1, 2007 – Dec. 31, 2010)

contact information, Social Security Numbers, the last location (by state) where the employee worked for the defendant for state tax reporting purposes, and compensation information for Class Members, identified by job titles, to the extent such information exists in each defendant's human resources databases [*see* Friedman Decl., Ex. B]. The Claims Administrator shall utilize Class Members' information provided by the defendants solely for purposes of effectuating Notice and administering the Settlement Fund, including withholding taxes, and shall keep the information confidential.

4. With this information, we expect to be able to mail via USPS and/or email the Notice to all Class Members. Based on our experience in other settlements involving defendants' employees as class members, we expect the direct notice reach here to approach over 90% of the class, easily satisfying due process considerations and the requirements of Rule 23, and making other forms of notice unnecessary.

5. In Plaintiffs' Motion for Preliminary Approval of Settlement with Blue Sky Studios, Inc., Class Counsel provides proposed forms for email notice, postcard notice, and a proposed plan of distribution.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 31st day of March, 2016 at San Rafael, California.


KENNETH JUE