

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In Re: LIQUID ALUMINUM SULFATE
ANTITRUST LITIGATION

Civil Action No. 16-md-2687 (JLL) (JAD)

**SUPPLEMENTAL DECLARATION OF
CHARLES E. FERRARA**

CHARLES FERRARA, of full age, hereby declares under penalty of perjury as follows:

1. I am a Director at the class action notice and settlement administration firm, Angeion Group, LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my personal knowledge.

2. Angeion was retained as the Settlement Administrator for the Settlement and appointed by the Court pursuant to the Court’s Order entered on July 19, 2018. I submit this declaration as a supplement to my earlier declaration, the Declaration of Charles E. Ferrara dated September 14, 2018 (the “Mailing Declaration”) (Dkt. No. 1077-2).¹

Mailed Notice

3. As reported in the Mailing Declaration, Angeion caused copies of the Notice and Claim Form (“Notice Packet”) to be mailed to 9,773 Direct Purchaser Settlement Class Members via USPS First-Class mail, postage prepaid.

4. Following the execution of the Mailing Declaration, the United States Postal Service (“USPS”) notified Angeion that six (6) Notice Packets were forwarded to addresses where

¹ All capitalized terms not defined herein shall have the meanings provided in the Settlement Agreement Between Direct Purchaser Class Plaintiffs and Defendants GEO Specialty Chemicals, Inc., Kenneth A. Ghazey and Brian C. Steppig previously filed with the Court. DE No. 911-3.

the recipient notified them of an address change.

5. In addition, using locator services, Angeion was able to obtain updated addresses for 554 Direct Purchaser Settlement Class Members whose original address was incomplete or undeliverable by the USPS, and Angeion caused Notice Packets to be re-mailed to these 554 Direct Purchaser Settlement Class Members.

6. As of November 6, 2018, Angeion has mailed a total of 10,327 Notice Packets.

Settlement Website and Toll-Free Hotline

7. Angeion continues to maintain the toll-free hotline (1-855-338-6128) and interactive voice response system devoted to the Settlement in order to accommodate inquiries from potential Direct Purchaser Settlement Class Members. Angeion also continues to maintain the dedicated Settlement Website (www.LiquidAluminumDirectSettlement.com) to assist potential Direct Purchaser Settlement Class Members. On September 17, 2018, Angeion posted to the Settlement Website copies of the papers filed in support of Direct Purchaser Class Plaintiffs' motion for final approval of Settlement, the Plan of Distribution, and Interim DPP Lead Counsel's motion for an award of attorneys' fees and expenses. Angeion will continue maintaining and, as appropriate, updating the toll-free hotline and Settlement Website until the conclusion of this administration.

8. As of November 6, 2018, the the toll-free hotline has received 48 calls, totaling 197 minutes, and the Settlement Website has had 608 visitors.

Requests for Exclusion Received

9. As reported in the Declaration of Charles E. Ferrara filed with the Court on October 17, 2018 (Dkt. No. 1105), Angeion received 12 timely requests for exclusion from the Direct Purchaser Settlement Class. Angeion has received no additional requests for exclusion.

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

Dated: November 7, 2018



CHARLES E. FERRARA