

# Epiq delivers best-in-class people, technology and service for class action administration matters anywhere in the world—regardless of size or complexity.

Our reputation as the global leader in class action administration has been reinforced through the successful management of some of history's largest matters, including:

## **In re: Payment Card Interchange Fee and Merchant Discount Antitrust Litigation**

This \$6B+ settlement is one of the largest antitrust class action settlements of all time. Epiq received roughly 80 billion rows of data with 163 types of data columns in 180 distinct files. The aggregated data set is over 110 terabytes and is hosted in a PCI-compliant environment. Over a five-month period, this data was used to generate 21 million settlement notice mailings. This settlement is currently on appeal and therefore the claims process has not yet begun. However, in order to efficiently handle the anticipated claim volume, we implemented a pre-registration process that allows merchants to provide information to expedite the claims process prior to claim filing.

## **In re: Takata Airbag Products Liability Litigation**

The settlement resolves claims that seven automobile manufacturers either manufactured, distributed, or sold certain vehicles containing allegedly defective airbag inflators manufactured by Takata Corporation and TK Holdings, Inc., that allegedly could, upon deployment, rupture and expel debris into the occupant compartment or otherwise affect the airbag's deployment, and that claimants sustained economic losses as a result. Epiq, initially acting as Notice Administrator, issued over 59 million notices. Post notice, Epiq has assisted the Settlement Special Administrator in the claim phase by managing the database which stores the notice population as well as monthly updated vehicle data from the defendants, and by processing over 3.5 million claims received via paper filing, mass filing, or online filing via a settlement website. To date, over \$112 million in settlement payments have been issued. Epiq is also the Claims Administrator for the Takata Airbag Tort Compensation Fund ("TATCTF") and Individual Restitution Fund ("IRF"). The TATCTF was established in connection with Takata's Chapter 11 Bankruptcy Plan of Reorganization to compensate individuals who suffered personal injury or wrongful death caused by the rupture or aggressive deployment of a Takata phase-stabilized ammonium nitrate airbag inflator. The IRF is an additional fund set up to compensate individuals who have been injured or suffered wrongful death as a result of a malfunctioning Takata Airbag Inflator. Epiq works closely with the Special Master/Trustee of the funds to review complex personal injury and wrongful death claims. To date, over 150 personal injury/wrongful death claimants have been compensated.

## **In re: Petrobras Securities Litigation**

Epiq is the Court appointed claims administrator for the \$3 billion settlements of the *In re Petrobras Securities Litigation*. As part of the notice plan for this matter, Epiq mailed approximately 2 million notices and published the summary notice in 99 international, national, and regional media in 31 languages and in 33 countries/regions. Epiq received and processed approximately 265,000 claims for eligible securities that included Petrobras American Depository Common Shares (ADSs), Preferred ADS and approximately 40 different Notes. Epiq has conducted two distributions and has issued more than 95,000 payments for more than \$2.8 billion.

## **Premera Blue Cross Security Incident**

In 2014, Premera Blue Cross was the target of an external criminal-cyberattack that could have accessed patient's personal information including names, addresses, birthdates, Social Security numbers and protected health information. In 2019, a settlement was reached establishing a \$32 million settlement fund to pay for credit monitoring services, provide cash payments for out-of-pocket losses, and time spent on the security incident. Epiq mailed over 8.6 million notices to class members and Hilsoft designed a media plan with notices appearing in the Wall Street Journal and geo-targeted online media. Final approval was granted in 2020 approving payment to more than 825,000 class members and offering free credit monitoring to more than 675,000 class members.

## Notable Matters

### In re: Volkswagen “Clean Diesel” Marketing, Sales Practices, and Products Liability Litigation

The lawsuit alleges that certain gasoline-powered luxury vehicles sold or leased in the United States were equipped with software that may have caused them to emit more carbon dioxide (CO<sub>2</sub>) and obtain worse fuel economy on the road than they did in testing conditions. The parties agreed to settle the lawsuit and compensate owners and lessees of eligible class vehicles. More than 360,000 class members were notified of the settlement, including a large number of high-profile individuals. Significant efforts were taken to ensure that class members who filed claims received the maximum compensation possible based on the make and model of the vehicle, and length of vehicle possession. Nearly \$21 million in settlement payments have been issued in this settlement.

### Adlouni v. UCLA Health Systems

The lawsuit alleges The Regents failed to prevent cyberattackers from accessing sensitive and personal information stored on UCLA Health’s computer network. It is disputed whether the cyberattackers accessed or removed sensitive and personal information on the network. The parties agreed to settle the lawsuit and provide free credit monitoring and insurance. In total, Epiq sent more than 6 million notices, including two separate reminder notices. More than 125,000 class members enrolled for free credit monitoring, and a bilingual call center was deployed to support class members. Final Approval was granted on June 28th, 2019. The parties agreed to settle the lawsuit and provide free credit monitoring and insurance, reimbursement of up to \$5,000 for out-of-pocket costs incurred to prevent identity theft and reimbursement of up to \$20,000 for unreimbursed losses associated with the unauthorized use of personal information and identity theft.

### In re: Oil Spill by the Rig “Deepwater Horizon”

Prior to settlement, Epiq acted as a shared database manager for the litigation, collecting data from plaintiffs’ counsel, defense counsel, the Gulf Coast Claims Facility, and the court to create an aggregated system of record to manage all plaintiff data. Responsibilities included data intake and processing of all new forms filed on PACER and LexisNexis File & ServeXpress, loading partially complete data lists, identifying exceptions and mismatches and resolving missing data, duplicates and incorrect information for the parties. Epiq’s legal noticing division, Hilsoft Notifications, was then appointed as the notice administrator for both the \$7.8 billion economic damages and medical benefits settlements. Across a condensed six week period, Hilsoft ran notices nationally and locally in more than 2,000 print publications. Approximately 10,000 television and radio spots aired across 26 media markets stretching from Houston to Miami. In addition to English, notices appeared in Spanish and Vietnamese. It is estimated that more than 95% of all adults living in the Gulf Area and more than 83% of all adults in the United States had an opportunity to see the notice. In total, the notice effort was one of the largest ever undertaken in a class action settlement.

### Bank Overdraft Summary

Epiq has implemented more In re: Checking Account Overdraft MDL NO. 2036 overdraft class action settlements than any other administrator and is currently providing settlement services to five of the six largest U.S. banks. Our ability to intake and normalize complex data from a multitude of sources proves a natural fit for banks and other financial services firms.

### Mortgage Servicing Regulatory Settlement Summary

Epiq is currently handling a number of remediation and distribution programs involving various financial institutions pursuant to private settlements and consent orders with the OCC, DOJ, FRB and CFPB. Examples of these engagements include:

- A borrower identification and distribution program to support a \$35 million Department of Justice (DOJ) and Consumer Financial Protection Bureau (CFPB) settlement with a financial institution related to mortgage loans made to African-American and Hispanic borrowers.
- A payment distribution program to support an expedited payment agreement between the Office of the Comptroller of the Currency (OCC) and a financial institution which resolves an Independent Foreclosure Review of the financial institution’s foreclosure practices.
- A notification, claims and distribution program to support a Federal Reserve settlement with a financial institution related to mortgage loans originated at more than 800 branch offices.
- A notification, claims and distribution program to support a \$320 million Home Affordable Modification Program (HAMP) settlement between the DOJ and a financial institution.