

The logo for Epiq Scale is displayed in a large, white, sans-serif font. The letter 'i' in 'Epiq' has a blue dot. The background of the top half of the page is a dramatic, dark sky with heavy, grey clouds. A person wearing a bright yellow jacket and white pants stands on a dark, rocky cliff edge, looking out towards the horizon. The overall mood is one of resilience and leadership in a challenging environment.

# epiq scale

**With more countries adopting consumer class action models across the globe and emerging trends in collective redress litigation, it's important to choose a claims administrator that can navigate the ever-changing world of cross-border litigation.**

Our reputation as the global leader in class action administration has been reinforced through the successful management of some of history's largest settlements. Whether your administration is small or large, routine or complex, we offer best-quality class action and claims management for cases anywhere in the world.

## What we offer

**Deep resources and relationships.** With offices in the U.S., U.K., and Canada, we have the right people and resources in the right place at the right time to handle matters of any size with speed, precision, and accountability. Our experts have been providing legal notice expertise to cross-jurisdictional clients for more than a decade and have a broad appreciation of international class action practice, especially as it varies among jurisdiction.

**Vast experience and expertise.** Our leading position in class action administration has been reinforced in some of the world's largest cases. In addition, our class action notices have appeared in nearly every country in the world and in dozens of languages, receiving wide judicial recognition.

**Advanced technology.** State-of-the-art facilities and applications deliver the efficiencies and metrics you care about with complete process transparency and confidence

**World-class security.** Your data and business is safe with us in highly secure data centers that exceed Tier IV standards and are monitored 24/7/365.

## How we deliver

**Plan.** Expert consultants partner with clients to develop a comprehensive project plan, define repeatable procedures and assemble a dedicated case team that meets project requirements.

**Execute.** As we implement your plan, you have immediate access to your dedicated Epiq team leader by phone or email and we are fully staffed to ensure that challenges are overcome and results are delivered as expected.

**Report and deliver data.** We provide the highest level of efficient client service and transparency, and provide timely, accurate project reports. You have access to all information 24/7/365.

## Global Leader in Settlement Administration

## Representative cases

**Merricks v Mastercard (U.K)** - Competition Litigation brought on behalf of all UK residents from 1992-2008. Epiq was retained to provide notice and claims administration plan on behalf of an indirect purchaser class. (Currently on appeal)

**Lloyd v Google (U.K)** - Data Privacy litigation claiming Google illegally obtained iPhone users internet browsing data. Epiq has been retained to consult on the notice and claims administration plan. (Recent dismissal to be appealed)

**In Re: International Air Transportation Surcharge Antitrust Litigation, MDL 1793 (E.D.N.Y.)** – We were retained to administer a settlement fund for both US and UK class members. Almost 1.4 million direct mail notices were sent along with 2.7 million email notices and over 320,000 claims were processed. This settlement required support in both the U.S. and the U.K., including utilizing Royal Mail services, website, telephone support, and banking operations and awards were issued in both Dollars and Pounds. An extensive de-duplication process was required since claimants were only able to claim one ticket per class member.

**In re Foreign Exchange Benchmark Rates Antitrust Litigation** - We are serving as claims administrator of the \$2 billion In re Foreign Exchange Benchmark Rates Antitrust Litigation settlement. GCG was retained as notice and claims administrator creating the process under which the international, multi-party notice process took place, sending over one million claims. GCG has worked in partnership with class counsel to address the changing scope of the administration, anticipating issues and proposing solutions to ensure class members needs and concerns were addressed.

**Royal Dutch Shell Securities Litigation (Netherlands)** - Filed in the Netherlands, we administered a \$385M Settlement for Non-United States Resident purchasers of Royal Dutch Shell Securities.

**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. We 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: Air Cargo Shipping Services Antitrust Settlements** – Created and implemented robust notice programs, maintained settlement websites, handled class member calls, administered claims, and distributed funds for the over \$1.2 billion total in 6 groups of settlements, involving 37 airline defendants. The notice plans involved over 300 publications globally, representing the largest in-country measured international notice program ever conducted.

**Precision v. PWT ('Freight Forwarders')** – This lawsuit includes allegations that freight forwarders conspired to inflate prices for the services by, among other things, creating suggested-pricing letters that were sent to customers. We standardized and deduplicated records from over 3,000 data files from 35 different defendants, aggregating and standardizing 12 million customer transaction records. We mailed a total of 2,323,671 Claim Packages in four languages during the initial mailing. A second mailing consisted of 1,675,227 Claim Packages sent in six languages. To date we've received 14,236 paper and web claims and expect more as the filing deadline is March 2016. Our phone line and website support English, Japanese, German, Hindi, Standard Chinese and Traditional Chinese languages consistent with those supported in the mailed claim packages.

**Contact** Randy Burkholder, Vice President, Phone +1 203 202 2671