

In the United States District Court
For the District of Massachusetts

JOHN W. GRIFFITHS, on behalf of)
Himself and all others similarly situated,)
Plaintiff,)

Civil Action No. 15-13022-NMG

v.)
)

AVIVA LONDON ASSIGNMENT)
CORPORATION, AVIVA LIFE)
INSURANCE)
COMPANY, AVIVA INTERNATIONAL)
INSURANCE LTD, f/k/a CGU)
INTERNATIONAL INSURANCE, plc,)
ATHENE HOLDING, LTD, ATHENE)
LONDON ASSIGNMENT)
CORPORATION and ATHENE)
ANNUITY AND LIFE COMPANY,)
)

Defendants.

**SUPPLEMENTAL DECLARATION OF JOSEPHINE BRAVATA
CONCERNING THE MAILING OF THE NOTICE TO SETTLEMENT CLASS
MEMBERS, REQUESTS FOR EXCLUSIONS RECEIVED, AND OBJECTIONS
SUBMITTED**

I, **JOSEPHINE BRAVATA**, declare

1. I submit this supplemental declaration, in order to provide the Court and the parties to the above-captioned litigation with information regarding the mailing of the Class Notice, any requests for exclusions received, and the objections filed. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein.

2. I am the Quality Assurance Manager of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over seventeen years of experience specializing in administration of class action cases. SCS was established in April 1999 and has administered over three-hundred fifty (350) class action cases since its inception.

3. As noted in the Declaration of Josephine Bravata concerning the Mailing of the CAFA Notice, Mailing of the Notice to Settlement Class Members, Requests for Exclusions Received and Objection Submitted (“Bravata Declaration”) dated August 8, 2018, SCS mailed, by first class mail, the Notice approved by the Court to 5,073 Settlement Class Members who are beneficiaries of structured settlement annuities assigned to Athene London Assignment Corporation (formerly known as Aviva London Assignment Corporation and as CGU London Annuity Service Corp.), which includes all annuities covered by the Capital Maintenance Agreement between CGU International Insurance plc and CGNU London Annuity Service Corp. dated February 1, 2002, where such annuities remained in force as of October 2, 2013.

4. SCS established the website, www.strategicclaims.net/aviva, on July 10, 2018. To date, the webpage has received 1,135 page views by 489 unique individuals.

5. Out of the 5,073 Notices mailed, 268¹ were returned. Of these, the post office provided forwarding addresses for 6; SCS immediately mailed another Notice to these Class Members at the updated addresses. The remaining 268 Notices returned as undeliverable were “skip-traced” to obtain updated addresses by using Experian and Lexis Nexis and re-mailed if updated addresses were provided. Through our skip tracing efforts, we mailed another Notice to 172 Settlement Class Members. A total of 134 Notices remain undeliverable due to no results provided by Experian and Lexis Nexis and those that were returned again after being mailed another Notice through the skip tracing efforts. Thus, only 2.6% of the 5,073 Notices mailed have been returned and deemed unsuccessfully delivered, with 97.4% of the 5,073 Notices mailed (and not having been returned) being presumed as having been successfully delivered to the Settlement Class Members. In our experience, the 97.4% successfully delivered rate is higher than what we have observed in most class actions with direct mailed notice. Based on our

¹ The amounts in this paragraph includes the amounts mentioned in the Bravata Declaration.

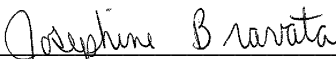
experience, we typically see greater than 10% of mailed notices returned as undeliverable, or no more than 90% successfully delivered.

6. To date, SCS has received one request for exclusion. **Exhibit A** is a redacted copy of the exclusion request. The deadline to request exclusion was postmarked no later than September 12, 2018.

7. To date, SCS has not received an objection to the proposed Settlement. The deadline for objections was September 12, 2018.

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

Signed this 17th day of September 2018, in Media, Pennsylvania.



Josephine Bravata

August 12, 2008

Settlement Administrator

Griffiths v. Aviva Settlement

PO Box 230

Media, PA 19063

I request that I be excluded from the settlement in Griffiths v. Aviva London
Assignment Corporation, et al., (Civil Action No. 15-cv-13022-NMG).

Mabel L. Card

Mabel L. Card

Contract # [REDACTED] 1021

[REDACTED]
Stafford, VA [REDACTED]

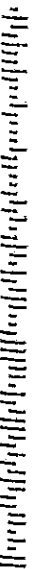


Settlement Administrator
Griffiths v. Aviva Settlement
PO Box 230
Media, PA 19063

RICHMOND VA 230
06 SEP 2018 PM 5.1



19063-023030



3