

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

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RIGOBERTO SANDOVAL,	:	Civil Action
individually and as a representative of a class of	:	No. 3:17-cv-1573 (MPS)
similarly situated plan participants and	:	
beneficiaries, on behalf of the	:	
EXELA 401(k) PLAN,	:	
the successor-in-interest of the	:	
NOVITEX ENTERPRISE SOLUTIONS	:	
RETIREMENT SAVINGS PLAN,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
EXELA ENTERPRISE SOLUTIONS, INC.,	:	
NOVITEX ENTERPRISE SOLUTIONS	:	
EMPLOYEE BENEFITS COMMITTEE	:	
and DOES NO. 1-10, Whose Names Are	:	
Currently Unknown,	:	
	:	
Defendants.	:	

**SUPPLEMENTAL DECLARATION OF JOSEPHINE BRAVATA  
CONCERNING AN UPDATE ON THE MAILING OF THE  
SETTLEMENT NOTICE AND FORMER PARTICIPANT CLAIM  
FORMS, OBJECTIONS RECEIVED, AND FORMER PARTICIPANT  
CLAIM FORMS SUBMITTED**

I, Josephine Bravata, declare:

1. I am a Quality Assurance Manager of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over twenty years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over four-hundred and fifty (450) class action cases since its inception. I am over 21 years of age and am not a party to this Litigation. I have personal knowledge of the facts set forth herein.

1           2.       I respectfully submit this supplemental declaration in order to provide the  
2 Court and the parties to the Litigation with updated information regarding the mailing of  
3 the notice to inform Class Members of the Settlement, the objections received, and the  
4 Former Participant Claim Forms received.

5           3.       As stated in the Declaration of Cornelia Vieira Concerning the Mailing of  
6 the Settlement Notice and Former Participant Claim Form, and Mailing of CAFA Notice  
7 dated July 6, 2021 (“Vieira Declaration”), SCS mailed, by first class mail, the court  
8 approved Notice to 6,954 individuals on June 25, 2021 as required by the Court’s  
9 Preliminary Approval Order dated April 26, 2021 (the “Court’s Order”). The 6,954  
10 individuals represent 4,010 individuals with active accounts that were mailed a Notice and  
11 2,944 individuals who are former participants that were mailed a Notice with Former  
12 Participant Claim Form.  
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14           4.       Out of the 4,010 Notices mailed for the active accounts, 85 were returned  
15 as undeliverable. Of these, the United States Postal Service provided forwarding addresses  
16 for 2, and SCS immediately mailed another Notice to the updated addresses. The  
17 remaining 83 Notices returned as undeliverable were “skip-traced” to obtain updated  
18 addresses and 47 were re-mailed to updated addresses.  
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20           5.       Out of the 2,944 Notice and Former Participant Claim Forms mailed, 170  
21 were returned as undeliverable. Of these, the United States Postal Service provided  
22 forwarding addresses for 2, and SCS immediately mailed another Notice and Former  
23 Participant Claim Form to the updated addresses. The remaining 168 Notice and Former  
24 Participant Claim Forms returned as undeliverable were “skip-traced” to obtain updated  
25 addresses and 134 were re-mailed to updated addresses.  
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6. The Vieira Declaration stated that on June 25, 2021, SCS established the website for the Settlement, [www.strategicclaims.net/sandoval401k](http://www.strategicclaims.net/sandoval401k), and SCS made available a toll-free phone number (866-274-4004). SCS continues to maintain the website and to respond to Class Member’s inquiries.

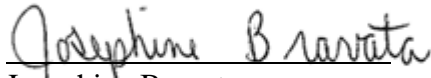
7. The Vieira Declaration also stated that on June 25, 2021, SCS issued the Summary Notice as a national press release via PRNewswire as per the Court’s Order.

8. To date, SCS has not received any objections to the fairness, reasonableness or adequacy of the Settlement, to any terms of the Settlement Agreement, or to proposed Administrative Expenses, Attorneys’ Fees and Costs, or Class Representative’s Compensation. The deadline by which objections must be postmarked is August 15, 2021.

9. The deadline for submitting the Former Participant Claim Form is August 24, 2021. To date, SCS has received 383 Former Participant Claim Forms.<sup>1</sup>

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

Signed this 3<sup>rd</sup> day of August 2021, in Media, Pennsylvania.

  
Josephine Bravata

<sup>1</sup> The 383 Former Participant Claim Forms represent 287 former participants, 36 active accounts, and 60 individuals not on the class list.