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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JAMIE PETTIT, et al.,
Plaintiffs,

v.

PROCTER & GAMBLE,
Defendant.

Case No. 3:15-cv-2150 RS

Hon. Richard Seeborg

DECLARATION OF JONATHAN P. SHAFFER OF HEFFLER CLAIMS GROUP IN SUPPORT OF FINAL APPROVAL

I, Jonathan P. Shaffer hereby declare as follows:

1. I am employed as a Client Service Manager by Heffler Claims Group (“Heffler”), the Claim Administrator in the above-entitled action. Heffler’s main office address is 1515 Market Street, Suite 1700, Philadelphia, Pennsylvania 19102. My telephone number is (267) 765-7412. I am over twenty-one years of age and authorized to make this declaration on behalf of Heffler and myself. The following statements are based on my personal knowledge and information provided by other experienced Heffler employees working under my supervision. This declaration is being filed in support of Plaintiffs’ Motion for Final Approval of the Class Action Settlement in the above-captioned matter.

2. Heffler has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities, employment and labor, consumer and government enforcement matters. Heffler has provided notification and/or claims administration services in more than 1,000 cases. More information about Heffler’s experience is provided in the Declaration of Jeanne Finegan in support of preliminary approval. See Dkt No. 117-5.

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**DECLARATION OF JONATHAN P. SHAFFER OF HEFFLER CLAIMS GROUP
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1 3. On November 26, 2018, Heffler was appointed as the Claim Administrator to provide
2 administration services in this case, referred to herein as the “Settlement.” See Dkt. No. 129.
3 Heffler’s duties in this Settlement include: (a) sending CAFA Notice by certified mail; (b)
4 establishing a post office box for receipt of correspondence, exclusions forms, objections, and Claim
5 Forms; (c) establishing a toll-free number; (d) establishing a Settlement Website; (e) receiving and
6 processing objections and requests for exclusion; (f) receiving and processing Claim Forms; and (g)
7 any other tasks that counsel mutually agree or the Court orders Heffler to perform.

8 4. On November 27, 2018, Heffler opened and continues to use the mailing address of Pettit v
9 Procter & Gamble, c/o Claim Administrator, P.O. Box 58280, Philadelphia, PA 19102-8280 to
10 receive exclusion requests, objections, Claim Forms, and other communications regarding the
11 Settlement.

12 5. On November 27, 2018, Heffler established a toll-free number, 1-833-305-3913, for Class
13 Members to call and obtain additional information 24 hours a day regarding the Settlement via an
14 Interactive Voice Response (IVR) system, in addition to being able to speak to a live representative.

15 6. As of March 13, 2019, Heffler has received 241 calls to the toll-free number, totaling 12
16 hours and 54 minutes of time to the IVR system as well as 9 hours and 47 minutes of time with live
17 operators.

18 7. On December 10, 2018, Heffler established the Settlement Website at
19 www.Pettitwipesettlement.com, which provides, *inter alia*, a description of the Settlement, a list of
20 important dates, answers to frequently asked questions, a copy of the long form notice, a page to
21 submit requests for exclusion, a page to submit Claim Forms, contact information, and copies of
22 important Settlement documents and filings. Class Members have access to the Settlement Website
23 24 hours a day. The Settlement Website continues to be fully operational and fully functional. A
24 copy of the website homepage is attached hereto as **Exhibit A**.

25 8. As of March 13, 2019, 276,552 users have visited the website totaling 616,944 page views.

26 9. On October 26, 2018, Heffler was provided the text for the Notices, Claim Form, and
27 exclusion form, which the Court subsequently approved in its order of preliminary approval. The
28 Notices explained the terms of the Settlement and informed Class Members of their rights, including

**DECLARATION OF JONATHAN P. SHAFFER OF HEFFLER CLAIMS GROUP
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1 the process to seek exclusion from the Settlement, object to the Settlement, and how to submit a
2 Claim Form and the deadlines associated with those actions. Without changing the contents of the
3 Notices, Heffler re-formatted the notices for publication purposes and received approval from
4 Counsel. In all respects, Heffler has implemented the Notice Plan that was approved by this Court,
5 including providing publication, Internet, and social media notice, as well as a press release.

6 10. To supplement the declaration of Jeanne C Finegan dated January 24, 2019; The online
7 Notice campaign ran through February 7, 2019, and retargetting continued through the end of the
8 campaign. During this period, online Notice ran continuously, with the exception of December 24,
9 25, 31, 2018 and January 1, 2019. Through its entirety, the Notice campaign served a total of 101
10 million online impressions.

11 11. As of March 13, 2019, Heffler has received and processed 120 pieces of correspondence
12 received through the Settlement Website.

13 12. As of March 13, 2019, Heffler has received and reviewed 17 pieces of mail correspondence
14 received through the P.O. Box.

15 13. To be considered timely, all Claim Forms, requests for exclusion, and objections to the
16 Settlement must have been received by Heffler by February 28, 2019.

17 14. As of March 13, 2019, Heffler has received 58 requests for exclusion from the Settlement.
18 A list of Class Members who excluded themselves is attached hereto as **Exhibit B**.

19 15. As of March 13, 2019, Heffler has not received any objections to the Settlement.

20 16. As of March 13, 2019, Heffler has received a total of 187,805 claims. A breakdown of the
21 claims received is as follows:

- 22 a. 186,088 timely Claim Forms received through the Settlement Website. Of the 186,088:
23 i. 2,123 Claim Forms were filed claiming eight (8) or more packages, thus requiring
24 Proof of Purchase to support these claims. If all these claims are approved, a total of
25 59,335 packages would be credited and a total amount of \$35,601 would be paid for
26 these claims.

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**DECLARATION OF JONATHAN P. SHAFFER OF HEFFLER CLAIMS GROUP
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1 ii. 175,840 claims were filed claiming seven (7) or fewer packages, which do not require
2 Proof of Purchase. If all of these claims are approved, a total of 1,144,898 packages
3 will be credited and a total amount of \$686,938.80 would be paid for these claims.

4 iii. 8,125 Claim Forms were submitted for purchases made in the State of New York,
5 for a total of 54,308 packages and a total theoretical payment of \$32,584.80. Because
6 purchases in the State of New York are not included in this Settlement, these claims
7 will be rejected pursuant to the terms of the Settlement Agreement.

8 b. 1,289 timely Claim Forms were received from a third-party filer. Of the 1,289:

9 i. Five (5) claims were filed claiming eight (8) or more packages, thus requiring Proof
10 of Purchase to support these claims. If all of these claims are approved, a total of
11 175 packages would be credited and a total amount of \$105 would be paid for these
12 claims.

13 ii. 1,284 claims were filed claiming seven (7) or fewer packages, which do not require
14 Proof of Purchase. If all of these claims are approved, a total number of 6,666
15 packages would be credited and a total amount of \$3,999.60 would be paid for these
16 claims.

17 iii. Zero (0) of these claims were submitted for purchases in the State of New York.

18 c. 418 timely paper Claim Forms were received, of which:

19 i. 119 claims were filed claiming eight (8) or more packages, thus requiring Proof of
20 Purchase to support these claims. If all of these claims are approved, a total of 3,025
21 packages would be credited and a total amount of \$1,815 would be paid for these
22 claims.

23 ii. 285 claims were filed claiming seven (7) or fewer packages, which do not require
24 Proof of Purchase. If all of these claims are approved, a total number of 1,781
25 packages would be credited and a total amount of \$1,068.60 would be paid for these
26 claims.

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iii. 14 claims were submitted for purchases in the State of New York, with a total number of 177 packages and a total possible award amount of \$70.20. These claims will be rejected for the reasons discussed above.

d. 10 late paper Claim Forms were received, of which:

i. Five (5) claims were filed claiming eight (8) or more packages, which require Proof of Purchase to support the claims. If all of these claims are approved, a total of 89 packages would be credited and a total amount of \$54.40 would be paid for these claims.

ii. Five (5) claims were filed claiming seven (7) or fewer packages, which do not require Proof of Purchase. If all of these claims are approved, a total package amount of 33 packages would be credited and a total amount of \$19.80 would be paid.

iii. Zero (0) of these claims were for purchases in the State of New York.

Pursuant to the Settlement Agreement, Heffler is currently validating the Claim Forms it received. For example:

- Claims are being reviewed for “Householding,” to ensure claimants receive up to \$4.20 (without Proof of Purchase) or \$30 (with Proof of Purchase) per Household.
- Claim Forms are being reviewed for accuracy and legitimacy.
- Claims with insufficient documentation to support the packages claimed will be sent a deficiency notice allowing the claimant an opportunity provide additional documentation to support and “cure” their claim deficiency.
- Packages claimed to have been purchased in the State of New York will be rejected.

I declare under the penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed on March 14, 2019 in Philadelphia, Pennsylvania.

Jonathan P. Shaffer

**DECLARATION OF JONATHAN P. SHAFFER OF HEFFLER CLAIMS GROUP
IN SUPPORT OF MOTION FOR FINAL APPROVAL**

Exhibit A

HOME

FAQS

DOCUMENTS

CONTACT

Pettit v Procter & Gamble

United States District Court Northern District of California San Francisco Division

Case No. 3:15-cv-2150 RS

If You Are A Purchaser Of Charmin Freshmates Flushable Wipes Before Between April 6, 2011 And November 26, 2018 You May Be Eligible To Receive Benefits From This Settlement

Please Review the Content of this Website Carefully.

- This class action Settlement will resolve two lawsuits against The Procter & Gamble Company ("P&G") involving Charmin Freshmates Flushable Wipes. The lawsuits contend that these wipes were inappropriately marketed as "flushable," "septic safe," and "safe for sewer and septic systems." The lawsuits seek a court order to stop the practices and refund customers a portion of the purchase price. P&G denies these allegations and maintains that the wipes perform as advertised.
- In connection with this Settlement, P&G agreed to make changes to the labeling of the wipes. In addition, P&G will provide Class Members a partial cash refund of sixty cents (\$0.60) per package purchased, up to \$30 per Household with Proof of Purchase, or \$4.20 per Household without Proof of Purchase.
- The lawyers who brought the lawsuits will ask the Court for up to \$2,150,000 to be paid to them by P&G as fees and expenses for investigating the facts, litigating the cases, and negotiating the Settlement. They will additionally ask for \$5,000 for one of the Plaintiffs who initially brought these lawsuits, \$3,000 for the other three Plaintiffs who initially brought these lawsuits, and \$1,000 for the thirteen other Plaintiffs who joined in 2018. These will be requested as Class Representative Payments, to compensate the Plaintiffs for taking on the risks of pursuing this litigation and for agreeing to a broader release of claims than other Settlement Class Members.
- Your legal rights are affected whether you act, or don't act. Read this website carefully.
- This website summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the [Settlement Agreement](#) available on this website or contact Class Counsel at Gutride Safier LLP, 100 Pine Street, Suite 1250, San Francisco, CA 94111.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS

YOUR RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
Submit a Claim Form	The only way to receive payment, i.e., partial refunds for your purchases.	Received by February 28, 2019
Exclude Yourself	Get out of the lawsuit and the Settlement. This is the only option that allows you to ever bring or join another lawsuit against P&G that raises the same legal claims released by this Settlement. You will receive no payment.	Received by February 28, 2019
OBJECT OR COMMENT	Write to the Court about why you do or don't like the Settlement, the amount of attorneys' fees, or the payments to the Plaintiffs.	Received by February 28, 2019
GO TO THE HEARING	Speak in Court about the fairness of the Settlement, the amount of attorney's fees, or the payments to the Plaintiffs.	March 28, 2019 At 1:30 PM
DO NOTHING	You will receive no payment and have no right to sue later for the claims released by the Settlement.	

- These rights and options—and the deadlines to exercise them—are explained on this website.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement and after any appeals are resolved. Please be patient.

[Documents](#)
[Contact](#)
[Submit Claim](#)
[Submit Exclusion](#)
[Long Form Notice](#)

Important Dates

Exclusion Deadline.
Thursday, February 28, 2019

You must submit your exclusion request **online** no later than Thursday, February 28, 2019, or mail your request for [Exclusion Form](#) so that it is received no later than Thursday, February 28, 2019.

Objection Deadline.
Thursday, February 28, 2019

You must mail your objection(s) and/or notice of intent to appear at the Final Approval Hearing so that it/they are received no later than Thursday, February 28, 2019.

Claim Form Deadline.
Thursday, February 28, 2019

You must submit your Claim Form **online** no later than Thursday, February 28, 2019, or mail your completed paper [Claim Form](#) so that it is received no later than Thursday, February 28, 2019.

Final Approval Hearing Date.
Thursday, March 28, 2019

The Final Approval Hearing is scheduled for Thursday, March 28, 2019 at 1:30 PM. Please check this website for updates.

Important Documents


[First Amended Class Action](#)

Final Approval Hearing


On March 28, 2019, at 1:30 p.m., the Court will hold a hearing to determine (1) whether the proposed Settlement is fair, reasonable, adequate and should receive final approval; (2) whether the applications for attorneys' fees, costs, and/or expenses brought by the Class Counsel should be granted; and (3) whether the application for Class Representative Payments to the Plaintiffs who brought the lawsuit should be granted. The hearing will be held at the United States District Court, Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, Courtroom 3, before the Honorable Richard Seeborg. This hearing date may change without further notice to you. Consult this Settlement Website, or the Court docket in this case at <https://pacer.login.uscourts.gov/> (perform a case number query using case number 3:15-cv-02150-RS), for updated information on the hearing date and time.


This website is authorized by the Court, supervised by counsel and controlled by the Claim Administrator approved by the Court. This is the only authorized website for this case.


For more information please call 1-833-305-3913.


 [Final Approved Class Action Complaint](#)
(PDF: 4.8 MB)

 [Motion For Preliminary Approval](#)
(PDF: 334.4 kB)


 [Gutride Declaration ISO Motion For Preliminary Approval](#)
(PDF: 115.0 kB)

 [Finegan Declaration Concerning Notice Program With Exhibits](#)
(PDF: 1.8 MB)

 [Order Granting Preliminary](#)
(PDF: 163.9 kB)


 [Settlement Agreement](#)
(PDF: 3.1 MB)

 [Long Form Notice](#)
(PDF: 209.5 kB)


 [Claim Form](#) (PDF: 135.0 kB)


 [Exclusion Form](#) (PDF: 65.9 kB)


 [Motion for Final Approval of Class Settlement](#)
(PDF: 357.0 kB)

 [Declaration of Jeanne Finegan](#)
(PDF: 21.6 MB)

 [Declaration of Adam Gutride](#)
(PDF: 472.2 kB)

 [Declaration of Hassan Zavareei](#)
(PDF: 229.6 kB)

 [Declaration of Stuart Scott](#)
(PDF: 302.7 kB)

 [Motion For Final Approval](#)
(PDF: 68.8 kB)

Having Trouble?

Having trouble opening .pdf files? You can download


 [Acrobat Reader](#) for free from www.adobe.com.

Exhibit B

<u>Count</u>	<u>First Name</u>	<u>Last Name</u>	<u>State</u>
1	JENNIFER	HILL	MD
2	AMANDA	RANDAZZO	MO
3	ALYSSA	WILSON	VA
4	RAHUL	SANAP	IL
5	JUSTIN	GAYLIARD	NC
6	SHELIA	TRICHE	TX
7	TYANNE	CHAVIS	NC
8	KATHY	BLOCK	NC
9	BRITTNIE	COLLIS	FL
10	RON	COLLI	FL
11	RACHEL	RUST	OH
12	LAURENA	DO	IA
13	NORMA	GREENWOOD	TX
14	NORM	GREENWOOD	TX
15	RICK	GREENWOOD	TX
16	LATINA	FOREMAN	MD
17	JENNY	JOYCE	NC
18	REBECCA	SMITH	SC
19	CAROLYN	DIXON	NC
20	JOE	HENNIGAN	AZ
21	TAWANDA	TORBERT	AL
22	TRINA	GHRAEL	NC
23	ANTOWNNE	JAMES	FL
24	VICTOR	MAGALLON	CA
25	STEPHANIE	GENTKOWSKI	OH
26	ANTHONY	PITOCCHO	IN
27	TAHOSINCLAIR	SINCLAIR	VA
28	CONNOR	HUNTER	NC
29	WILLIS	JOHNSON	GA
30	ALISA	BRANS	KY
31	CAMARIS	FAIRCLOTH	CA
32	GABRIELA	MEULENS	FL
33	MICHAEL	PIARULLI	PA
34	RICHARD	CARDWELL	NC
35	KATHIE	MARTIN	GA
36	GILBERT	MATA JR	TX
37	NAKIDRA	KENNEDY	LA
38	DIANA	RUIZ	CA
39	SHELIA	WEBB	MS
40	MARIETTA	VAUGHN	AL
41	HARROLYNN	SHERMAN	LA
42	BILLIE	STANFORD	AL
43	SAMUEL	SHANNON	AL
44	JUSTIN	VERRETTE	AZ
45	JENIFER	DETHRO	CA
46	FELICIA	WILLIAMS	MS
47	DEBBI	BYRUM	TN
48	LEONA	DINNAN	MI
49	MARIANN	JACKSON	IL

50	CHRISTEN	JACKSON	IL
51	JENNIFER	JACKSON	VA
52	JAMES	JACKSON	IL
53	MARY	SADLER	IL
54	BENITA	OLIVEIRA	FL
55	JOHN	MARIANO	NY
56	RICHARD	SNIDER	WV
57	GINA	SMITH	CA
58	DAYRON	AARON	NJ