

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ANDREA SCHMITT; ELIZABETH  
MOHUNDRO; AND O.L. by and through  
her parents, J.L. and K.L., each on their own  
behalf, and on behalf of all similarly  
situated individuals,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN  
OF WASHINGTON; KAISER  
FOUNDATION HEALTH PLAN OF  
WASHINGTON OPTIONS, INC.; KAISER  
FOUNDATION HEALTH PLAN OF THE  
NORTHWEST; and KAISER  
FOUNDATION HEALTH PLAN, INC.,

Defendants.

NO. 2:17-cv-1611-RSL

DECLARATION OF ELIZABETH ENLUND  
REGARDING CLAIMS PROCESSING

**DECLARATION OF ELIZABETH ENLUND REGARDING  
CLAIMS PROCESSING**

I, Elizabeth Enlund, hereby declare and state as follows:

1. I am a Senior Settlement Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). I am a certified Project Management Professional (PMP)<sup>®</sup> and hold a Bachelor of Science degree from Portland State University. Prior to joining Epiq in 2019, I managed a variety of complex projects in highly regulated environments through the government



1 **TOLL-FREE INFORMATION LINE**

2 7. Epiq established and is maintaining a toll-free interactive Voice Response Unit  
3 (“VRU”) telephone number to provide information and accommodate inquiries from Settlement  
4 Class Notice Recipients. As of April 10, 2024, the toll-free number received 769 calls. Epiq has  
5 and will continue to maintain and update the VRU throughout the Settlement administration  
6 process. Epiq also maintains a TeleTYpe (TTY) Line for Settlement Class Notice Recipients to  
7 access using dedicated TTY hardware or accessibility technology. Live operators are available  
8 during normal business hours to assist Settlement Class Notice Recipients with inquiries. As of  
9 April 10, 2024, the TTY Line has received 0 calls.

10  
11 **EMAIL INBOX**

12 8. Epiq established and maintains an email inbox,  
13 info@KPHearingAidSettlement.com for Settlement Class Notice Recipients to ask questions  
14 regarding the Settlement. As of April 10, 2024, Epiq has received a total of 397 incoming emails.  
15 Epiq will continue to maintain this inbox throughout the Settlement administration.

16  
17 **REQUESTS FOR EXCLUSION**

18 9. Settlement Class Members who wished to be excluded from the Settlement were  
19 required to mail a written requests for exclusion to Epiq no later than the request for exclusion  
20 deadline of April 4, 2024. As of April 10, 2024, Epiq received five written requests for exclusion  
21 from the Settlement, although there is no indication that those five individuals had purchased  
22 hearing aids or related services while enrolled with Kaiser.

23  
24 **OBJECTIONS RECEIVED**

25 10. Pursuant to Paragraph 13 of the Order, Settlement Class Members who wished to  
26 object to the Settlement were required to submit written objections to the Court no later than the  
27  
28

1 objection deadline of April 4, 2024. As of April 10, 2024, Epiq is not aware of nor has received  
2 any timely written objections to the Settlement.

3  
4 **COSTS OF CLASS NOTICE AND CLAIMS ADMINISTRATION**

5 11. To date, the cost of Class Notice and Epiq's claims administration has totaled  
6 \$357,452.56. This total includes the advance deposits made by both parties' counsel totaling  
7 \$356,332. Epiq anticipates that the cost of claims administration to complete this project will total  
8 approximately \$539,301, including the cost of notifying claimants regarding their claims,  
9 addressing any arbitrations, distributing funds to Class Members, distributing funds to the  
10 designated *cy pres* organizations (if necessary), and taxes.

11  
12 **CLAIMS RECEIVED**

13 12. Pursuant to 6.5 of the Agreement and paragraph 16 of the Court's Amended Order:  
14 (1) Preliminarily Approving the Settlement Agreement; (2) Approving Class Notice Package; and  
15 (3) Establishing a Final Settlement Approval Hearing and Process, Class Members who wished to  
16 make a claim were required to submit a completed Claim Form to the Notice and Claims  
17 Administrator online or via U.S. Mail, so that it was submitted no later than April 4, 2024. As of  
18 April 10, 2024, Epiq has received 925 Claim Forms for 913 unique Class Members, of which 167  
19 were submitted by Class Notice Recipients who previously made a claim for hearing aid(s) and/or  
20 associated services during the class period. For the 925 claims received to date, 917 have been  
21 deemed timely, 8 have been deemed late, 15 are duplicative of another claim, and 11 were not  
22 eligible Settlement Class Members.<sup>2</sup>

23 13. The total claimed amount for timely, non-duplicate claims is \$2,695,629.29. The  
24 total claimed amount for timely and late claims is \$2,725,397.23. The dollar amounts of the claims

25  
26  
27 <sup>2</sup> As Epiq is still receiving, reviewing, and processing timely and late claims, the claims information provided herein is subject to  
28 further analysis for eligibility and quality control, and is, therefore, preliminary at this time.

1 will change once all claims have been adjudicated for verification as set in section 6.5 of the  
2 Agreement, including review of transactions and required substantiation documentation.

3  
4 I declare under penalty of perjury under the laws of the United States and the State of  
5 Washington that the foregoing is true and correct and that this declaration was executed on April  
6 11, 2024, in Tucson, Arizona.

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13 Elizabeth Enlund, PMP  
14 Senior Project Manager  
15 Epiq Class Action & Claims Solutions, Inc. (“Epiq”)