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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

JED and ALISA BEHAR, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

NORTHROP GRUMMAN CORPORATION
AND NORTHROP GRUMMAN SYSTEMS
CORPORATION,

Defendants

Case No. 21-cv-03946-HDV-SK

CLASS ACTION

**DECLARATION OF ROCHELLE J.
TEICHMILLER IN SUPPORT OF JOINT
STIPULATION TO AMEND THE DEADLINE
FOR PRINTED PUBLICATION NOTICE**

DECLARATION OF ROCHELLE J. TEICHMILLER

I, Rochelle J. Teichmiller, declare as follows:

1. I am a Project Manager in the class action notice and settlement administration division of A.B. Data, Ltd. ("A.B. Data"), headquartered in Milwaukee, Wisconsin. I am over 21 years of age and am not a party to the above-captioned action (the "Action"). A.B. Data has been appointed by the Court to serve as Class Administrator in this Action.
2. I submit this Declaration at the request of the Parties in support of their Joint Stipulation to Amend the Deadline for Publication Notice Set Forth in Paragraphs 19 and 32 of the Preliminary Approval Order. This declaration is based upon my personal knowledge and upon information provided to me by my associates and other A.B. Data staff members. If called upon to do so, I could and would testify competently to the matters set forth herein.
3. On June 1, 2026, I submitted a declaration in support of Plaintiffs' motion for preliminary settlement approval (ECF No. 410), which described A.B. Data's qualifications and experience

1 and the proposed Notice Program. I incorporate those descriptions by reference and do not repeat
2 them here.

3 **DIRECT MAIL, EMAIL, AND DIGITAL PUBLICATION NOTICE**

- 4 4. In accordance with Paragraph 17 of the Preliminary Approval Order, A.B. Data obtained the
5 names and last known mailing addresses obtained from Class Counsel and processed those
6 names and addresses through the National Change of Address database maintained by the United
7 States Postal Service.
- 8 5. On August 11, 2026, A.B. Data caused the Notice Package—consisting of the Long Form Notice
9 and the Claim Form (in English and Spanish)—to be mailed by First-Class U.S. mail to all
10 Settlement Class Members identified on that list. The postmark date of the Notice Package, and
11 therefore the Settlement Notice Date, is August 11, 2026. A.B. Data also identified personal
12 email addresses of Settlement Class Members where reasonably available and is supplementing
13 the mailed notice by email in accordance with Paragraph 18 of the Preliminary Approval Order.
- 14 6. The case-specific website and the case-specific toll-free telephone number described in
15 Paragraphs 21 and 22 of the Preliminary Approval Order are operational and have been available
16 to Settlement Class Members since on or before the date of mailing.
- 17 7. The digital publication notice contemplated by Paragraph 20 of the Preliminary Approval Order
18 commenced on August 18, 2026.

19 **PRINT PUBLICATION NOTICE**

- 20 8. The Short Form Notice did not appear in print in the *Los Angeles Daily News* or in the Valley
21 News Group publications on or before August 18, 2026, as directed by Paragraph 19 of the
22 Preliminary Approval Order. That result was caused by a scheduling error in the placement of
23 the print insertions and the publication schedules of the periodicals.
- 24 9. Upon learning of the error, A.B. Data's media team investigated whether the print placements
25 could be moved to earlier dates. The applicable submission deadlines for the publications had
26 already passed, and because the Valley News Group titles are weekly publications, the
27 placements could not be advanced.
- 28 10. The Short Form Notice is now scheduled to appear in the *Los Angeles Daily News* on Friday,

August 21, 2026, and in the Valley News Group publications—*Warner Center News*, *Valley Vantage*, and *Calabasas Enterprise*—on Thursday, August 27, 2026. Each publication will carry the Short Form Notice once, as directed by Paragraph 19.

11. A.B. Data advised Class Counsel of the revised print publication dates on August 18, 2026, promptly after learning of the error.

ADDITIONAL NOTICE MEASURES

12. To address the delay in print publication, A.B. Data is serving additional digital impressions beyond those originally planned for the 30-day digital campaign, including impressions targeting local newspaper websites serving the Class Area. A.B. Data is providing these additional impressions at no additional cost to the Settlement Fund or to the Settlement Class.
13. The reminder postcard notice required by Paragraph 23 of the Preliminary Approval Order remains on schedule. A.B. Data will mail the reminder postcard, printed in both English and Spanish, on or about September 10, 2026—thirty days after the postmark date of the Notice Package—to all Settlement Class Members who have not by then submitted a Claim Form.

OPINION REGARDING THE EFFICACY OF THE NOTICE PROGRAM

14. Based on my individual expertise and experience, and that of my A.B. Data colleagues, and on A.B. Data's experience with similar notice programs, it is my opinion that the short delay in the commencement of print publication notice will not adversely affect the efficacy of the Notice Program approved by the Court.
15. The print publications will run well in advance of each of the deadlines that the publication notice is intended to inform. The August 21 and August 27, 2026 publication dates precede the September 25, 2026 opt-out and objection deadline by 35 days and 29 days, respectively, and precede the October 10, 2026 claims deadline by 50 days and 44 days, respectively.
16. When the print publication notice is combined with the digital publication notice, the additional digital impressions described above, the direct mail notice completed on August 11, 2026, the email notice, the case-specific website and toll-free telephone number, and the follow-up postcard notice, it remains my opinion that the Notice Program is expected to timely reach more than 70% of Settlement Class Members. Pursuant to the *Federal Judicial Center's Judges' Class*

1 *Action Notice and Claims Process Checklist*, it is reasonable for notice to reach between 70%
2 and 95% of class members.

- 3 17. For the foregoing reasons, it remains my opinion that the Notice Program, as implemented and
4 as described herein, constitutes the best notice practicable under the circumstances and satisfies
5 the requirements of Rule 23 of the Federal Rules of Civil Procedure and due process.

6 I declare under penalty of perjury that the foregoing is true and correct.
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8 Executed this 20th day of August 2026, at Milwaukee, Wisconsin.
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13 Rochelle J. Teichmiller, Declarant
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