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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 PLAINTIFFS'
MOTION FOR PRELIMINARY SETTLEMENT
APPROVAL**

Hearing:

Date: July 16, 2026

Time: 10:00 a.m.

Place: Courtroom 5B, 5th Floor
350W. 1st Street

Los Angeles, CA 90012

Judge: Hon. Hernán D. Vera

DECLARATION OF ROCHELLE J. TEICHMILLER

I, Rochelle J. Teichmiller, declare:

1. I am a Project Manager at 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 actions (the "Action").

2. I make this declaration at the request of the Parties in this Action. This declaration is based upon my personal knowledge and information provided by the Parties, my associates, and A.B. Data staff members.

3. A.B. Data, Ltd. has been appointed as notice, claims, and/or settlement administrator in hundreds of class actions and designed, implemented, and coordinated some of the largest and most complex class action notice and administration plans in the country.

4. Our work includes notification, claims processing, and distribution plans in all types of

1 class actions, including environmental/contamination and property damage matters, consumer, antitrust,
2 employment, civil rights, insurance, wage and hour, securities, ERISA, and other class actions. See e.g.,
3 *Meeker, et al. v. Bullseye Glass Co.*, No. 2:16-CV-01174-MAH (Multnomah County Circuit Court, State of
4 Oregon); *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*, No. 16-CV-16164
5 (Multnomah County Circuit Court, State of Oregon).

6 5. We have successfully designed and implemented multi-faceted media notice plans utilizing
7 digital media, social media, and print media. Our digital media experts have certifications, including:
8 Google Ads Display Certification, Google Ads Search Certification, Google Analytics Certification,
9 Facebook Certification, IAB¹ Digital Media Buying & Planning Certification, IAB Digital Media Sales
10 Certification, and Hootsuite Social Marketing Certification.

11 6. We are committed to protecting the confidentiality, integrity, and availability of personal
12 identifying and other information that it collects, and requires that its employees, subcontractors,
13 consultants, service providers, and other persons and entities it retains to assist in distributions do the
14 same.

15 7. We have developed an Information Security Policy, a suite of policies and procedures
16 intended to cover all information security issues and bases for A. B. Data, and all of its divisions,
17 departments, employees, vendors, and clients.

18 8. We have a high number of high-profile clients, frequently subjecting it to physical, logical,
19 data, and information systems security reviews and audits, and has been determined to be compliant with
20 ISO/IEC 27001/2 and Payment Card Industry (PCI) data security standards, the Gramm-Leach-Bliley
21 (GLB) Act of 1999, the National Association of Insurance Commissioners(NAIC) Regulations, the Health
22 Insurance Portability and Accountability Act (HIPPA) of 1996, and the Health Information Technology
23 for Economic and Clinical Health Act (HITECH).

24 9. Integral parts of our claims administration process and fraud detection and prevention
25 efforts include: quality assurance review, quality control review, comprehensive proprietary fraud
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27 ¹ The Interactive Advertising Bureau is an American advertising business organization that develops
28 industry standards, conducts research, and provides legal support for the online advertising industry.

1 detection and prevention procedures and databases to prevent payment of allegedly fraudulent claims,
2 providing the highest level of security and customization of security procedures, maintaining records of
3 all class member inquiries, investigating and resolving undelivered material, monitoring outstanding and
4 cleared checks, and maintaining mailing and financial databases for an agreed-upon period.

5 **NOTICE PROGRAM**

6 10. The proposed notice program includes direct (mail) notice to known Settlement Class
7 Members, email notice (where reasonably available), and paid media notice.

8 11. The Long Form Notice, **Exhibit 3** (English) and **Exhibit 4** (Spanish), and Claim Form,
9 **Exhibit 5**, will be used for direct mail notice. The summary notice (“Short Form Notice”), **Exhibit 6**, will
10 be used for paid media notice where applicable.

11 12. A.B. Data will mail the Long Form Notice and Claim Form (“Notice Package”) via First-
12 Class U.S. mail directly to all Settlement Class Members as identified in Class Counsel’s class list. To the
13 extent available, A.B. Data will identify Settlement Class Member email addresses and supplement
14 mailing of the Notice Package by delivering it via email to all Settlement Class Members.

15 13. Prior to mailing, A.B. Data will process the names and mailing addresses through the
16 national change of address (“NCOA”) database compiled and maintained by the U.S. Postal Service
17 (“USPS”) and mail the Notice Package using the updated information. For any Notice Package returned
18 by the USPS as undeliverable as addressed (“UAA”) with a forwarding address, A.B. Data will promptly
19 remail the Notice Package to the forwarding address. For any UAA Notice Package returned with no
20 forwarding address provided, A.B. Data will search for an updated address using an information provider
21 to which we subscribe. If an updated address is available, A.B. Data will promptly remail the Notice
22 Package to the updated address. If no current address is located, the Settlement Notice for that individual
23 will be deemed undeliverable.

24 14. To supplement the direct notice, the Short Form Notice, in the form of a Publication Notice,
25 will appear once in the publications *Los Angeles Daily News* and Valley News Group (*Warner Center*
26 *News*, *Valley Vantage*, and *Calabasas Enterprise*).

27 15. Digital banner advertisements will run for 30 days on the Google Display Network and
28 YouTube platforms, targeting users located in California, specifically within the affected Class area. The

1 ads will be available in both English and Spanish and will include embedded links to the case-specific
2 website.

3 16. To assist potential Class Members in understanding the terms of the proposed Settlements
4 and their rights, A.B. Data will update the case-specific website and toll-free telephone number.

5 17. The case-specific website will appear on both the Short Form and Long Form Notices and
6 in all print and digital ads. The website will provide Settlement Class Members with the opportunity to
7 get detailed information about the Settlements and relevant documents, including the notice documents, a
8 downloadable Claim Form, the Settlement Agreement, Motions for Preliminary and Final Approval,
9 Motion for Attorney's Fees and Costs, other relevant pleadings, and Court Orders, as they become
10 available. The Motion for Attorney's Fees and Costs and any related filings will be made available on the
11 website for a reasonable period of time, but no less than 20 days before the deadline for class members to
12 file an objection to the Settlement Agreement. The website will also provide functionality for Settlement
13 Class Members to submit their claims online. The website will remain available until the Effective Date
14 as set forth in Section 6.3(f) of the Settlement Agreement.

15 18. The case-specific toll-free telephone number will appear on the Short Form and Long Form
16 Notices and website. The toll-free telephone number is equipped with an automated interactive voice
17 response system that presents callers with a series of choices to hear prerecorded information. If callers
18 need further help, they may leave a voicemail message, and their call will be returned.

19 **NOTICE FORM CONTENT**

20 19. The Long Form Notice, **Exhibit 3** (English) and **Exhibit 4** (Spanish), describes the nature
21 of the action, the claims asserted in the operative complaint, and the Defendants' contentions. The Long
22 Form Notice provides the definition of the classes, explains the terms of the settlement, including the
23 settlement amount, the estimated range of the distribution amount, and the preclusive effect of the
24 Settlement Agreement and that participation in the Settlement will result in a release of Released Claims,
25 as well as the proposed attorney's fees and expenses, and incentive payments. The Long Form Notice
26 includes an explanation that lays out the Settlement Class Members' options under the settlement: they
27 may remain in the class and submit a claim, exclude themselves from the settlement and pursue their
28 claims separately against defendants, object to the settlement but still remain in the class, or remain in the

1 class without submitting a claim form receiving no payment and giving up the right to sue for the claims
2 released by the Settlement Agreement. The Long Form Notice explains the procedures for: remaining in
3 the class and submitting a claim, opting out of the settlement, and objecting to the settlement and provides
4 information about the Final Approval Hearing. Finally, the Long Form Notice explains that the Settlement
5 Class Members are solely responsible for determining the tax consequences of payments made pursuant
6 to the Settlement Agreement.

7 20. The Short Form Notice, **Exhibit 6**, identifies the Court and the Action; summarizes the
8 nature of the case, the \$75,000,000 non-reversionary Settlement Fund, and the definition of the Settlement
9 Class; describes the three geographic sub-areas and the separate pool for eligible former owners who sold
10 a Class Area property after July 1, 2024; and informs readers of (i) the existence of estimated payment
11 ranges with an explicit disclaimer that the amounts are estimates only, (ii) their rights to submit a Claim
12 Form, exclude themselves from the Settlement Class, or object to the Settlement, together with the
13 applicable deadlines, (iii) the preclusive effect of the Settlement and the release of Released Claims,
14 including the express carve-out for personal injury, wrongful death, and medical monitoring claims, and
15 (iv) that Settlement Class Members are solely responsible for the tax consequences of any payment
16 received. The short form notice also identifies the date, time, and location of the Final Approval Hearing
17 and directs readers to the settlement website and toll-free telephone number, where the Long Form Notice,
18 Claim Form, Settlement Agreement, and other case documents will be available.

19 21. It is my opinion, based on my individual expertise and experience, and that of my A.B.
20 Data colleagues, that the proposed notice program is designed to effectively reach Settlement Class
21 Members and will deliver notices that will capture Settlement Class Members' attention and provide them
22 with the necessary information to effectively understand their rights and options. The Notice Program,
23 including direct notice by mail and email, together with paid media efforts, is estimated to reach more
24 than 70% of Settlement Class Members. Pursuant to the Federal Judicial Center's *Judges' Class Action*
25 *Notice and Claims Process Checklist*, it is reasonable for notice to reach between 70-95% of class
26 members. This proposed notice program conforms to the standards employed by A.B. Data in similar
27 notification plans. For all these reasons, in my opinion, the proposed Notice Plan is the best practicable
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1 under the circumstances and satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure
2 and due process.

3 22. Attached as **Exhibit 3** hereto is a true and correct copy of Proposed Settlement Notice
4 (English).

5 23. Attached as **Exhibit 4** hereto is a true and correct copy of Proposed Settlement Notice
6 (Spanish).

7 24. Attached as **Exhibit 5** hereto is a true and correct copy of Proposed Claim Form.

8 25. Attached as **Exhibit 6** hereto is a true and correct copy of Proposed Short Form Notice.
9

10 CLAIM VERIFICATION

11 26. As part of its administration of the Settlement, A.B. Data will verify each Claim and
12 Release Form submitted by Settlement Class Members in accordance with Section 6.4 of the Settlement
13 Agreement. A.B. Data will maintain a database of property ownership information derived from the
14 records of the Los Angeles County Assessor's Office for properties located within the Class Area, which
15 records identify the current owner of record for each parcel and which A.B. Data will also use to verify
16 and supplement the class list and direct mail notice.

17 27. For each Claim and Release Form received, A.B. Data will (i) confirm that the property
18 address identified by the claimant is within the Class Area, (ii) review the documentary proof of ownership
19 submitted with the Claim and Release Form, and (iii) cross-reference the claimant's name and property
20 information against the Los Angeles County Assessor records and any other available data sources as
21 necessary, including commercially available skip-tracing and identity-verification databases.

22 28. Where the information submitted by the claimant matches the Assessor records, the claim
23 will be approved for payment. Where discrepancies appear—including, for example, name discrepancies
24 attributable to trusts, estates, marital status changes, or co-ownership—A.B. Data will conduct additional
25 review, which may include contacting the claimant for clarifying information or supplemental
26 documentation. A.B. Data will use industry-standard procedures to identify and reject duplicate,
27 fraudulent, or otherwise invalid claims, and will report to Class Counsel and Defense Counsel any claims
28 that cannot be verified after reasonable effort.

DISBURSEMENT OF FUNDS

29. Following entry of an order granting preliminary approval, A.B. Data will establish a qualified settlement fund within the meaning of Internal Revenue Code § 1.468B-1 (the “QSF”) for the purpose of receiving and holding the Settlement Fund pending distribution to Settlement Class Members, and will provide Defendants with wire instructions. A.B. Data will serve as administrator of the QSF and will be responsible for (i) obtaining a separate taxpayer identification number for the QSF, (ii) filing all required federal, state, and local tax returns on behalf of the QSF, (iii) paying from the QSF any taxes owed on interest or other income earned by the QSF, and (iv) issuing IRS Form 1099 or other required tax-reporting forms to Settlement Class Members who receive payments, as required by Section 4.4(c) of the Settlement Agreement. All interest earned on the QSF will accrue to the benefit of the Settlement Class.

30. A.B. Data will calculate the payment amount due to each approved Settlement Class Member who has submitted a valid claim in accordance with the allocation methodology set forth in Section 4.4(b) of the Settlement Agreement, after deduction from the Settlement Fund of (i) Court-approved attorneys’ fees and costs, (ii) Court-approved service awards to the Class Representatives, and (iii) administrative costs. Within forty-five (45) days after the Effective Date, and consistent with Section 6.8(b) of the Settlement Agreement, A.B. Data will use its best efforts to issue initial payment checks to each Settlement Class Member whose Claim and Release Form has been approved. Payment checks will be sent by certified mail to the mailing address on file with A.B. Data for the Settlement Class Member.

31. Each payment check will remain valid and negotiable for 180 days from the date of mailing. For any check that remains uncashed at the expiration of that period, A.B. Data will undertake reasonable efforts to locate the Settlement Class Member, including through skip-tracing and updated address-verification databases, and will reissue the check with a new 90-day expiration date. If A.B. Data is unable to locate the Settlement Class Member within 180 days after the expiration of the original check, the funds represented by the uncashed check will be aggregated with any other uncashed funds and, in accordance with Section 6.8(c) of the Settlement Agreement, will be redistributed on a single occasion equally among all Participating Settlement Class Members who timely cashed their initial payment checks. Any funds

1 remaining after the one-time redistribution will be paid to a *cy pres* beneficiary to be designated by the
2 Court.

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4 **DECLARATIONS OF DUE DILIGENCE AND COSTS**

5 32. At least 21 days before the Final Approval Hearing, the A.B. Data shall prepare a
6 declaration of due diligence and proof of mailing of the Settlement Notice and e-mail (if e-mail was
7 deemed feasible), and any attempts by the A.B. Data to locate the Settlement Class Members, to Class
8 Counsel and Defense Counsel for presentation to the Court. A.B. Data will attach to the declaration a
9 report showing the name of each individual who submitted a timely and valid opt-out request.

10 33. No fewer than 10 court days before the Final Approval Hearing, the A.B. Data shall provide
11 the Court and all counsel for the Parties with a declaration detailing the Administrative Costs (as that term
12 is defined in the Settlement Agreement).

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

14 Executed this 1st day of June, 2026, at Milwaukee, Wisconsin.

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16 Rochelle J. Teichmiller, Declarant
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