

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CASA DE MARYLAND, INC., et al,

Plaintiffs,

v.

ARBOR REALTY TRUST, INC., et al,

Defendants.

Civ. Action No.: 8:21-CV-01778-DKC

ADMINISTRATOR'S REPORT AND DECLARATION OF NOAH FIORI

I hereby declare the following:

1. My name is Noah Fiori and I am the claims administrator at American Legal Claims Services, LLC ("ALCS") that has administered the notice and claims procedure in the matter of *Casa de Maryland, Inc. et al. v. Arbor Realty Trust, Inc., et al*, Case No. 8:21-cv-01778-DKC, pending in the United States District Court for the District of Maryland.
2. I have reviewed the Memorandum Opinion and Order of this Court Preliminary Approving the Class Action Settlement, specifically the Order regarding the Plan and Form of Notice, and the Claims, Opt-Out and Objections procedures, and the Class Action Settlement Agreement.
3. ALCS has complied with the Order of Preliminary Approval as to the Plan and Form of Notice and as far as administering Claims, Opt-Outs and Objections.
4. The Court's approved "Mail Notice" was served via first class mail on November 9, 2023 and 996 letters were served via US Mail upon Class Members. ALCS received 52 notices of returned mail. ALCS remailed the notice to 9 updates addresses and 43 items were deemed undeliverable. None of the 9 remailed notices were returned.

5. Email Notice was served on November 9, 2023 upon 214 last known class member email addresses.
6. The “Publication Notice” was published for a period of four consecutive weeks in “El Tiempo Latino” in November 2023 and in “Hyattsville Life and Times” in December 2023.
7. As of this February 22, 2024, 167 total claims have been received. 137 claims have been validated, 26 claims have been disallowed or were deficient. Pursuant to the settlement agreement, ALCS followed up with these 26 claims to cure the deficiencies by sending out a notice and requesting that the identified deficiencies in the claim submission be cured within the requisite cure period. ALCS received no responses to its notices regarding cure. Following such attempts to cure and in light of any additional documentation received from these claimants, ALCS determined that these claims were not valid because they lacked the necessary documentation. 4 claims were denied as duplicative. *See* Ex. 1. No claims were received by ALCS after the claims submission deadline.
8. Zero opt-outs have been received.
9. Zero objections have been received.
10. ALCS currently has incurred expenses and seeks fees in the amount of \$27,701.00 subject to further fees and costs to be sought at the Fairness Hearing. *See* Ex. 2.

I hereby declare under the penalty of perjury that the foregoing is true and accurate to the best of my ability and understanding.


Noah Fiori



American Legal Claim Services LLC

CASA v ARBOR Noticing Report as of February 23, 2024

This is the current report of all notices, returned mail, claims, exclusions and objections received to date.

Noticing Phase	Count	Date
Initial Notice	996	11/09/2023
Initial Email Noticing	214	11/09/2023
	1,210	
Return Mail	To Date	Percentage
Mailed Pieces Returned	52	
Remails to Updated Addresses	9	
Items Deemed Undeliverable	43	4.32%
Court Documents	To Date	Percentage
Claims Received	167	13.80%
Valid Claims	137	11.32%
Disallowed/Deficient Claims	26	
Duplicaitive Claims	4	
Exclusions Received	0	0.00%
Objections Received	0	0.00%

The Claims Deadline is **February 7, 2024**
The Exclusion/Objection Deadline is **January 8, 2024**



CASA V ARBOR QSF
PO BOX 23650
JACKSONVILLE, FL 32241-3650

Invoice Number

5469

CASA v ARBOR (682)**8:21-CV-01778-DKC****Invoice****February 9, 2024**

Description	Quantity	Rate	Amount
Project Setup	1.00	\$1,000.00	\$1,000.00
Import and Process Data	3.00	\$110.00	\$330.00
Document Formatting	6.00	\$110.00	\$660.00
Setup Email Template	1.00	\$500.00	\$500.00
NCOA Processing	1,244.00		\$200.00
Skiptrace Processing	672.00	\$1.25	\$672.00
Email 12 Page Notice plus 2 Page Claim Form	214.00	\$0.25	\$54.00
English & Spanish Notices (14 sheets)	996.00	\$2.00	\$1,992.00
Email Production	3.00	\$110.00	\$330.00
Administration Print and Mail Production	6.00	\$110.00	\$660.00
Processing Undeliverable Mail	51.00	\$0.75	\$38.00
Forwarding Order Expired Processing	1.00	\$1.50	\$2.00
Number of Address Locator Searches	51.00	\$1.25	\$64.00
Number of Remails to Updated Addresses	9.00	\$2.00	\$18.00
Operations Time for Updates/Remails	2.00	\$80.00	\$160.00
Project Administration including client communication, meetings, calls, exception processing	15.00	\$140.00	\$2,100.00
Class member inquiries and communications	10.00	\$110.00	\$1,100.00
Project Affidavits and Declarations	8.00	\$140.00	\$1,120.00
Process Paper Claims	136.00	\$4.00	\$544.00
Optical Imaging (2 images/claim)	272.00	\$0.30	\$82.00
Process On-Line Claims	12.00	\$2.00	\$24.00
Deficient Claim Processing	54.00	\$20.00	\$1,080.00
Process Opt-outs and Objections		\$80.00	\$0.00
Reports to Client (assume 1/2 hr./week/20wks.)	10.00	\$140.00	\$1,400.00
Sr. Consultant Project Administration	8.00	\$140.00	\$1,120.00
Consultant Project Administration	6.00	\$110.00	\$660.00
Supervision of Claims Processing & Exception Processing	4.00	\$110.00	\$440.00
Call Center Setup	1.00	\$500.00	\$500.00
Call Center Monthly Fees	8.00	\$100.00	\$800.00
IVR Minutes	279.00	\$0.35	\$97.00
Call Center Administration	8.00	\$110.00	\$880.00
Website Setup	1.00	\$1,000.00	\$1,000.00
Website Monthly fees	8.00	\$75.00	\$600.00
Website Administration	8.00	\$110.00	\$880.00
Establish QSF and obtain Tax ID	1.00	\$140.00	\$140.00
Bank fees	6.00	\$140.00	\$840.00
Check Clearing Fees	105.00	\$0.15	\$16.00
Distribution Calculations and Preparation	4.00	\$140.00	\$560.00
Print and Mail Checks to Class Members	123.00	\$1.00	\$123.00
Electronic Payments to Class Members	8.00	\$0.60	\$5.00
Operational Hours Distribution	2.00	\$80.00	\$160.00
Consultant Hours Distribution	2.00	\$110.00	\$220.00
Sr. Consultant Hours Distribution	2.00	\$140.00	\$280.00
Payments Requiring Reissue	5.00	\$3.00	\$15.00
Print/Mail 1099s to Class Members	131.00	\$4.00	\$524.00
1099 Consulting Hours Including 1099 Tax Reporting	8.00	\$110.00	\$880.00
Account Maintenance and Reconciliation	6.00	\$80.00	\$480.00
Management Hours for Reporting/Follow-up	6.00	\$140.00	\$840.00
Federal Tax Return for QSF	1.00	\$250.00	\$250.00
Postage			\$1,261.00