

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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MEREDITH CORPORATION, et al.

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Case No. 09 Civ. 9177 (PAE)

v.

SESAC LLC, et al.

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**DECLARATION OF STEPHANIE J. FIERECK, ESQ.  
ON IMPLEMENTATION OF CAFA NOTICE**

I, STEPHANIE J. FIERECK, ESQ., hereby declare and state as follows:

1. My name is Stephanie J. Fiereck, Esq. I am over the age of 21 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Legal Notice Manager for Epiq Legal Noticing, a firm that specializes in designing, developing, analyzing and implementing large-scale, un-biased, legal notification plans.

3. Epiq Legal Noticing is a division of Epiq Systems (“Epiq”), a firm with more than 20 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service, claims database management, claim adjudication, funds management and distribution services.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

**CAFA NOTICE IMPLEMENTATION**

5. At the direction of counsel for the Defendant SESAC, LLC, 57 officials, which included the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia and U.S. Territories were identified to receive the CAFA notice.

6. Epiq maintains a list of these state and federal officials with contact information for the purpose of providing CAFA notice. Prior to mailing, the 57 names and addresses selected from Epiq's list were verified, then run through the Coding Accuracy Support System ("CASS") maintained by the United States Postal Service ("USPS").<sup>1</sup>

7. On October 24, 2014, Epiq sent 57 CAFA Notice Packages ("Notice"). The Notice was mailed by certified mail to 56 officials, including the Attorneys General of each of the 50 states, the District of Columbia and U.S. Territory officials. The Notice was also sent by United Parcel Service ("UPS") to the Attorney General of the United States. The CAFA Notice Service List (USPS Certified Mail and UPS) is attached hereto as **Attachment 1**.

8. The materials sent to the Attorneys General included a cover letter, which provided notice of the proposed settlement of the above-captioned matter. The cover letter is attached hereto as **Attachment 2**.

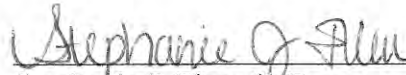
9. The cover letter was accompanied by a CD, which included the following:
- a. Class Action Complaint and First Amended Class Action Complaint;
  - b. Settlement Agreement (with all exhibits);
  - c. [Proposed] Final Judgment and Order of Dismissal (Settlement Agreement, Exhibit D);

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<sup>1</sup> CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes that appear on mail pieces. The USPS makes this system available to mailing firms who want to improve the quality of their ZIP + 4, CRIS and 5-digit coding accuracy.

- d. [Proposed] Settlement Class Notice (Settlement Agreement, Exhibit E);
- e. Related Orders in the Case; and
- f. Geographic Location of Class Members.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 17, 2014.

  
Stephanie J. Fiereck, Esq.

# Attachment 1

## CAFA Notice Service List

## USPS Certified Mail

Company	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Michael C Geraghty	PO Box 110300		Juneau	AK	99811
Office of the Attorney General	Luther Strange	501 Washington Ave		Montgomery	AL	36104
Office of the Attorney General	Dustin McDaniel	323 Center St Ste 200		Little Rock	AR	72201
Office of the Attorney General	Tom Horne	1275 West Washington St		Phoenix	AZ	85007
Office of the Attorney General	CAFA Coordinator	Consumer Law Section	455 Golden Gate Ave Ste 11000	San Francisco	CA	94102
Office of the Attorney General	John W Suthers	Ralph L Carr Colorado Judicial Center	1300 Broadway 10th Fl	Denver	CO	80203
Office of the Attorney General	George Jepsen	55 Elm St		Hartford	CT	06106
Office of the Attorney General	Irvin B Nathan	441 4th St NW		Washington	DC	20001
Office of the Attorney General	Joseph R Biden III	Carvel State Office Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	Pam Bondi	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Sam Olens	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	David M Louie	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Thomas J Miller	1305 E Walnut St		Des Moines	IA	50319
Office of the Attorney General	Lawrence G Wasden	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Lisa Madigan	100 W Randolph St		Chicago	IL	60601
Indiana Attorney General's Office	Greg Zoeller	Indiana Government Center South	302 W Washington St 5th Fl	Indianapolis	IN	46204
Office of the Attorney General	Derek Schmidt	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Jack Conway	Capitol Ste 118	700 Capitol Ave	Frankfort	KY	40601
Office of the Attorney General	James D Caldwell	1885 N Third St		Baton Rouge	LA	70802
Office of the Attorney General	Martha Coakley	1 Ashburton Pl		Boston	MA	02108
Office of the Attorney General	Douglas F Gansler	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Janet T Mills	6 State House Sta		Augusta	ME	04333
Department of Attorney General	Bill Schuette	PO Box 30212		Lansing	MI	48909
Office of the Attorney General	Lori Swanson	1400 Bremer Tower	445 Minnesota St	St Paul	MN	55101
Missouri Attorney General's Office	Chris Koster	PO Box 899		Jefferson City	MO	65102
MS Attorney General's Office	Jim Hood	Walter Sillers Bldg	550 High St Ste 1200	Jackson	MS	39201
Office of the Attorney General	Tim Fox	Department of Justice	PO Box 201401	Helena	MT	59620
Attorney General's Office	Roy Cooper	9001 Mail Service Ctr		Raleigh	NC	27699
Office of the Attorney General	Wayne Stenehjem	State Capitol	600 E Boulevard Ave Dept 125	Bismarck	ND	58505
Office of the Attorney General	Jon Bruning	2115 State Capitol		Lincoln	NE	68509
Office of the Attorney General	Joseph Foster	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	John Jay Hoffman	8th Fl West Wing	25 Market St	Trenton	NJ	08625
Office of the Attorney General	Gary K King	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	Catherine Cortez Masto	100 N Carson St		Carson City	NV	89701
Office of the Attorney General	Eric T Schneiderman	The Capitol		Albany	NY	12224
Office of the Attorney General	Mike DeWine	30 E Broad St 14th Fl		Columbus	OH	43215
Office of the Attorney General	E Scott Pruitt	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Ellen F Rosenblum	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Kathleen G Kane	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter Kilmartin	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	Rembert Dennis Office Bldg	1000 Assembly St Rm 519	Columbia	SC	29201
Office of the Attorney General	Marty J Jackley	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Herbert H. Slatery III	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Greg Abbott	300 W 15th St		Austin	TX	78701
Office of the Attorney General	Sean D. Reyes	Utah State Capitol Complex	350 North State St Ste 230	Salt Lake City	UT	84114
Office of the Attorney General	Mark R. Herring	900 E Main St		Richmond	VA	23219
Office of the Attorney General	William H Sorrell	109 State St		Montpelier	VT	05609
Office of the Attorney General	Bob Ferguson	PO Box 40100		Olympia	WA	98504
Office of the Attorney General	JB Van Hollen	PO Box 7857		Madison	WI	53707
Office of the Attorney General	Patrick Morrissey	State Capitol Complex	Bldg 1 Room E-26	Charleston	WV	25305
Office of the Attorney General	Peter K Michael	123 Capitol Bldg	200 West 24th St	Cheyenne	WY	82002
Office of the Attorney General	Talauaga Eleasalo V. Ale	Utulei Territory of American Samoa	PO Box 7	Pago Pago	AS	96799
Attorney General Office	Leonardo M Rapadas	ITC Building	590 S Marine Corps Dr Ste 706	Tamuning	GU	96913
Office of the Attorney General	Gilbert Birnbrich	Administration Bldg	PO Box 10007	Saipan	MP	96950
Office of the Attorney General	Cesar R. Miranda-Rodriguez	Apartado 9020192		San Juan	PR	00902
Department of Justice	Vincent Frazer	34-38 Kronprindsens Gade	GERS Bldg 2nd Fl	St Thomas	VI	00802

CAFA Notice Service List

UPS

Company	FullName	Address1	Address2	City	State	Zip
US Department of Justice	Eric H Holder Jr	950 Pennsylvania Ave NW		Washington	DC	20530

# Attachment 2

**NOTICE ADMINISTRATOR FOR UNITED STATES DISTRICT COURT**

HILSOFT NOTIFICATIONS  
10300 SW Allen Blvd  
Beaverton, OR 97005  
P 503-350-5800  
DL-CAFA@epiqsystems.com

October 24, 2014

Dear Sir or Madame:

**Class Action Fairness Act – Notice to Federal and State Officials**

As required by the “Class Action Fairness Act,” 28 U.S.C. §1715(b), please take note of a proposed settlement. This notice has been sent by the defendant noted below:

- **Case:** Meredith Corporation, et al. v. SESAC, LLC, et al., Case No. 09 Civ. 9177 (PAE).
- **Court:** United States District Court for the Southern District of New York.
- **Defendant:** SESAC, LLC.
- **Judicial Hearing Scheduled:** At this time, a Final Approval Hearing has not been scheduled by the Court. At the time of the hearing, these matters may be continued without further notice.
- **Documents Enclosed:** Copies of the following documents are contained on the enclosed CD in Adobe Acrobat PDF format. If you do not have Acrobat it may be obtained for free at <http://www.adobe.com/products/acrobat/readstep2.html>:
  - Class Action Complaint and First Amended Class Action Complaint;
  - Settlement Agreement (with all exhibits);
  - [Proposed] Final Judgment and Order of Dismissal (Settlement Agreement, Exhibit D);
  - [Proposed] Settlement Class Notice (Settlement Agreement, Exhibit E);
  - Related Orders in the Case; and
  - Geographic Location of Class Members.

Enclosures