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14 **UNITED STATES DISTRICT COURT FOR THE**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 ALICIA HERNANDEZ et al., individually
17 and on behalf of all others similarly situated,

18 Plaintiffs,

19 v.

20 WELLS FARGO BANK, N.A.,

21 Defendant.
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Case No. 3:18-cv-07354-WHA

**POST-DISTRIBUTION INTERIM
ACCOUNTING**

Pursuant to the Court's order granting final approval (Dkt. 292) and the Northern District of California's Procedural Guidance for Class Action Settlements, Plaintiffs submit this status update and interim post-distribution accounting.

Status of Distribution

The Court granted final approval of the settlement on behalf of 505 class members on October 12, 2020. Dkt. 292. Pursuant to that order and the settlement agreement, JND mailed economic damages checks and emotional distress checks to these class members on December 7, 2020. Declaration of Jennifer Keough at ¶ 10. Those checks had a void date of April 6, 2021. In the month leading up to that void date, JND and Class Counsel worked together to contact class members who had not cashed their checks. *Id.* at ¶ 11. Both JND and Class Counsel searched for e-mail addresses and phone numbers for these class members. We reached many and either advised them to cash their check, or for those who did not receive it, we obtained current addresses and JND sent them a new check. We located one class member who had moved to a different country and helped her deposit her high-value settlement check. During March and April, JND reissued over 50 economic damages checks to class members who had not been able to cash their initial checks. As of today, 90.1% of the net settlement fund has been cashed or deposited by class members. *Id.* at ¶ 14.

Class Counsel will continue working with JND to reach out to class members who have not cashed their checks. The checks JND re-issued have a void date of June 2, 2020. Within 21 days after that void date, Plaintiffs will file a final post-distribution accounting.

Interim Accounting Per the Procedural Guidelines

The following chart summarizes the distribution of settlement funds to date and other accounting information pursuant to the Northern District's post-distribution accounting guidelines.

Total Number of Class Members	510
Number of Opt-Out Requests Received	5
Percentage of Class Members Opting Out of Settlement	.98%
Number of Objections Received	0
Percentage of Class Members Objecting to Settlement	0.00%
Number of Class Members Participating in Settlement	505
Percentage of Class Members Participating in Settlement	99.02%
Total Number of Class Members (Including Opt-Outs) to Whom Notice Was Sent and Not Returned as Undeliverable	503

1	Total Settlement Fund	\$18,500,000
	Approved Attorneys' Fees	\$4,525,000
2	Attorneys' Fees Paid	\$2,262,500
3	Attorneys' Fees as a Percentage of Settlement Fund	25.0%
	Attorneys' Fee Multiplier	1.2
4	Approved Attorneys' Expenses	\$335,000
5	Attorneys' Expenses Paid ¹	\$327,500
6	Total Administration Costs	\$65,000
	Net Settlement Fund	\$13,582,500
7	Percentage of Net Settlement Fund Cashed	90.1%
8	Value of Payments Cashed (by Check or Wire)	\$12,340,814.42
	Value of Checks Not Cashed	\$1,234,194.21
9	Number of Checks Not Cashed (not including supplemental checks)	62
10	Number of Payments Cashed (by Check or Wire)	570
11	Average Recovery Per Class Member	\$21,595.77
	Median Recovery	\$14,443.73
12	Largest Amount Paid to a Class Member	\$123,735.66
13	Smallest Amount Paid to a Class Member	\$14,443.73
14	Total Number of Emotional Distress Claim Forms from Class Members	121
15	Percentage of Class Members Filing Claim for Emotional Distress	23.73%
16	Methods of Notice	U.S. Mail, settlement-specific website
17	Method of Payment to Class Members	Check or Wire
18	Total Number of Class Members Sent Payment	511 (as some Class Members requested to have their payment split among co-borrowers)
20	Cy Pres Payment	N/A

21 Dated: April 28, 2021

Respectfully submitted,

22 */s/ Michael L. Schrag*

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28 ¹ \$7,500 was returned to the net settlement fund. Dkt. 305.

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