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**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GRACE MURRAY, on behalf of herself
and others similarly situated,

Plaintiff,

v.

GROCERY DELIVERY E-SERVICES
USA INC. DBA HELLO FRESH,

Defendant.

Case No. 19-cv-12608-WGY

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF
JAY GERACI RE: CLAIM DATA IN TCPA
SETTLEMENTS**

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I, Jay Geraci, declare and state as follows:

1. I am a Senior Director with KCC Class Action Services, LLC (“KCC”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. KCC was appointed as the Settlement Administrator in in this matter and is not party to this action. I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

2. The current claims rate for Murray v. Grocery Delivery Services (19-cv-12608-WGY) is 2.19%.

3. I submit this declaration to provide information concerning publicly available data regarding claims rates in other TCPA Settlements that KCC has been the Settlement Administrator for:

- *Friedman v. LAC Basketball Club, Inc.*, No. 13-cv-00818 CBM (C.D. Cal.): 2%
- *Kolinek v. Walgreens, Co.*, No. 13-cv-04806 (N.D. Ill.): 2.28%
- *Abramson v. Palmco Energy P.A. LLC*, No. 19-cv-1675 (W.D. Pa.): 0.60%
- *Abramson v. American Advisors Group*, (18-cv-615-PLD) (W.D. Pa.): 0.54%
- *Braver v. Northstar Alarm Services, LLC*, No. 17-cv-00383 (W.D. Okla.): 1.93%
- *Braver v. Yodel Technologies*, No. 17-cv-00383 (W.D. Okla.): 0.82%¹
- *Hennie v. ICOT Hearing Systems, LLC dba ListenClear and ICOT Holdings LLC*, No. 18-cv-02045 (N.D. Ga.): 1.13% rate
- *Soukhaphonh v. Hot Topic, Inc.*, No. 16-cv-05124 (C.D. Cal.): 1.26%

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 8, 2021 at San Rafael, California.



JAY GERACI

¹ This was a different settlement than the *Northstar* settlement, although they were both part of the same case.