

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE ANIMATION WORKERS ANTITRUST
LITIGATION

Master Docket No. 14-CV-4062-LHK

DECLARATION OF KENNETH JUE
REGARDING ADMINISTRATION
COSTS

THIS DOCUMENT RELATES TO:

ALL ACTIONS

1. I am employed as a senior project manager of the Class Action Group at Kurtzman Carson Consultants (“KCC”). KCC serves as the Court-appointed Administrator of the settlements and litigation with Defendants Sony Pictures Animation, Inc. and Sony Pictures Imageworks, Inc., Blue Sky Studios, Inc., Pixar, Lucasfilm Ltd., LLC, DreamWorks Animation SKG, Inc, The Walt Disney Company, and Two Pic MC LLC f/k/a ImageMovers Digital LLC. As the senior project manager at KCC, I oversee the administrative services provided in this matter. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. On July 6, 2016, KCC was appointed the Settlement Administrator in the *In re: Animation Workers Antitrust Litigation*. In the course of its duties, KCC has to date incurred fees and expenses totaling \$36,062.92. The fees and expenses includes the following services performed to date:

- Data and Case Set-up

- Data Analysis
- Email Campaign Management
- Mailed Notice (including postage)
- Management, Search, and Remail of Undeliverable Notices
- Telephone and Email support
- Website Set and Maintenance
- Case Management

3. In addition to the ongoing costs of data analysis, management of undeliverable notices, telephone and email support, website maintenance, and case management, KCC will incur future costs for distribution of settlement payments. Distribution fees and expenses will include set up and management of the Qualified Settlement Fund, calculation of payments, payroll set up and tax reporting for multiple states, printing and mailing checks, postage, and post-distribution follow-up.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 14th day of September 2016 at San Rafael, California.

A handwritten signature in black ink, appearing to read "Kenneth Jue", is written over a horizontal line.

Kenneth Jue