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**JAMES M. KIM, Court Executive Officer
MARIN COUNTY SUPERIOR COURT
By: S. Hernandez, Deputy**

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15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 IN AND FOR THE COUNTY OF MARIN

17 UNLIMITED CIVIL JURISDICTION

18 MARY KNAPP-SAMET, JANE ANN
19 MIDDLETON, KATHRYN BALLINGER,
20 NORA BURNS, BARBARA RUSSELL,
21 WINNIE HUANG and HEATHER
22 GOSLINER, individually and on behalf of
23 others similarly situated,

24 Plaintiffs,

25 v.

26 MARIN GENERAL HOSPITAL
27 CORPORATION, a California corporation,
28 SUTTER HEALTH CORPORATION, a
California Corporation and DOES 1 through
50,

Defendants.

Case No.: 1400998

CLASS ACTION

**DECLARATION OF MICHAEL
SUTHERLAND IN SUPPORT OF
MOTION FOR UNOPPOSED
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND
CERTIFICATION OF SETTLEMENT
CLASS**

Hearing: March 23, 2016

Time: 1:30 p.m.

Dept.: B

Complaints filed: March 14, 2014

Trial Date: Vacated

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DECLARATION OF MICHAEL SUTHERLAND

I, MICHAEL SUTHERLAND, declare as follows:


1. I am the Chief Operating Officer for Simpluris Inc., ("Simpluris"). My business address is 1155 S. Semoran Blvd., Winter Park, FL 32792. My telephone number is (321) 223-5067. I am over twenty-one years of age and am authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance and consumer issues. Simpluris' competencies are pre-settlement consultation, data management, legal notification, call centers, claims processing, and distribution and tax reporting.

3. We have provided notification and/or claims administration services in more than 1000 settlements and noticing procedures. Of these, more than 1000 were Labor & Employment cases. Simpluris has handled in the last 10 years approximately \$600 Million in Settlements.

4. Simpluris has been selected by counsel as the class action settlement administrator.

I declare under penalty of perjury under the laws of the United States and of the State of California that the above is true and correct to the best of my knowledge and that this Declaration was executed this 25 day of February, 2016, in WINTER PARK, FL.


MICHAEL SUTHERLAND

simpluris

Class Action Settlement Administration

ABOUT SIMPLURIS

Simpluris, Inc. opened its doors in January 2007 as a class action settlement administration firm. A small collection of professionals proficient in class action settlement administration, marketing, direct mail development, and database design, with Troy Hoffman at its helm, began building the client-centric company with less than 10 clients. Over the course of 8 years, Simpluris has grown to 55+ employees, offices in 3 states, 500+ clients and over \$10 million in revenue. The success has derived from the construction of a cohesive team built with enthusiasm and vision. Simpluris is continually advancing its services including notification campaigns, case administration, data management, funds distribution and tax reporting persistently seeking modern techniques that offer efficiency and cost effective solutions to our clients. Simpluris will launch LiveCase™ (client centric software) shortly, which will take class action settlement administration to a whole new level.

Inc Magazine recently ranked Simpluris #171 on its 30th annual Inc 500, an exclusive ranking of the nation's fastest growing private companies.

CEO, Troy Hoffman, has been a guest lecturer and panel member in the industry on class action related topics, including online claims filing, class notice campaigns, and other relevant issues within class action administration. He has spoken at many seminars including:

- California 17200 Conference
- Class Action & UCL Conference
- Nixon Peabody Luncheon
- Class Action Litigation Summit
- Bridgeport symposium's, Regular Panel Member
- CASD-Panel Member

Our approach is to provide a high level of customer service to all our clients and to use automation to the fullest to provide economical as well as accurate results and work product.

Clients receive support from our experts, who include attorneys, accountants, IT experts and communications professionals with a deep understanding of the unique demands of complex administration for class action, mass tort, and international collective redress.

Every case is assigned a dedicated team of professionals that oversees and coordinates all aspects of the engagement. Our integrated approach assures the highest levels of quality, accuracy and timeliness to meet clients' deadlines.

Simpluris has successfully administered cases in a complete scope of different practice areas. Our proven procedures and best practices provide successful outcomes from start to finish. Our IT professionals work full time to upgrade our case management technology to advance our commitment to our clients. Our far-reaching experience has helped us effectively administer cases in Wage and Hour, retail, commercial, Consumer, liability, and Consumer Fraud.

AREAS OF PRACTICE

Antitrust	Employment/ADA	Personal Injury
Banking	Environmental	Product Liability
Civil Rights	Finance	Securities
Consumer/Product	Healthcare	Specialty Areas
Coupon	Insurance	Trade
Discrimination	Mass Tort	Wage and Hour

SERVICES AND SOLUTIONS

Call Center	Consulting	Notice of Class Certification
Case Administration	Data Management	Pre-Certification
Case Notification	Discovery Campaigns	Settlement Mailings
Case Websites	Fund Distribution and Tax	Statistical Analysis
Claims Processing	Reporting	Statistics Gathering
Class Member Tracking	Mailing Campaigns	