

The Honorable BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GENE ACHZIGER, individually and
as the representative of all persons
similarly situated,

Plaintiff,

v.

IDS PROPERTY CASUALTY
INSURANCE COMPANY,

Defendant.

No. 3:14-cv-05445-BHS

DECLARATION OF STEPHEN M. HANSEN IN
SUPPORT OF MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT

I, STEPHEN M. HANSEN, DECLARE UNDER PENALTY OF PERJURY UNDER
THE LAWS OF THE STATE OF WASHINGTON AS FOLLOWS:

1. I am over the age of eighteen years, a citizen of the United States, and have
personal knowledge of all facts contained herein. I am one of the attorneys of record for the
Plaintiff, Mr. GENE ACHZIGER. This declaration is submitted in support of Plaintiff's Motion
for Final Approval of Class Action Settlement.

2. On January 14, 2020, this Court entered its order granting preliminary approval of
the parties' settlement and certified this matter as a class action for purposes of settlement. [Dkt
#150].

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3. Pursuant to this Court’s order, JND Legal Administration was retained to disseminate notice to class members and to administer the class members’ claims. Attached as Exhibit “A” is a Settlement Status Report received from JND received on June 5, 2020. This document confirms the following as of June 5, 2020:

- a) Notices were mailed to class members on March 13, 2020. The notice program reached 96.16% of the Class.
- b) The objection deadline has passed with no objections.
- c) The opt-out deadline has passed with only two opt-outs. The names of the opt-outs are Vassil Dimitrov and Ellen K. Stehouwer.
- d) The claims deadline is August 6, 2020, with 1,748 claims submitted as of June 5, 2020. The claims submission rate is 26.78% as of June 5, 2020.
- e) The settlement website (<https://www.achzigerclasssettlement.com/>) has generated 5,296 page views.

DATED at TACOMA, Washington, this 8th day of June, 2020.



 STEPHEN M. HANSEN, WSBA #15642

Exhibit A



Achziger v. IDS Property Casualty Insurance Co. Settlement Status Report

(as of June 5, 2020)

COMPILATION OF CLASS LIST	
Total Unique Class Member Records (after de-duping):	6,786

MAILED NOTICE	
Initial Notices Mailed:	6,786
Total Undeliverable Notices:	789
<ul style="list-style-type: none"> • Undeliverable Notices with Forwarding Address Information: 	7
<ul style="list-style-type: none"> • Undeliverable Notices Re-mailed after Research: 	579
<ul style="list-style-type: none"> ○ Re-mailed Notices Returned as Undeliverable 	70

TELEPHONE ASSISTANCE PROGRAM (1-833-900-1647)	
Total Incoming Calls:	101

CLAIMS RECEIVED	
Total Claims Received:	1,748
Paper Claims:	1,049
Online Claims:	699

OPT-OUTS / EXCLUSIONS (Postmarked by May 12, 2020)	
Timely Opt-outs Received:	2

OBJECTIONS (Postmarked by May 12, 2020)	
Objections Received:	0

SETTLEMENT WEBSITE (www.AchzigerClassSettlement.com)	
Total Unique Visitors:	1,141
Total Page Views:	5,296