

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION (CINCINNATI)**

DINO RIKOS, TRACEY BURNS, and
LEO JARZEMBROWSKI, On Behalf of
Themselves, All Others Similarly Situated,

Plaintiffs,

v.

THE PROCTER & GAMBLE COMPANY,

Defendant.

Case No.: 1:11-cv-226

**DECLARATION OF
JACQUELINE KIMBROUGH ON
STATUS OF SETTLEMENT
ADMINISTRATION**

I, Jacqueline Kimbrough, declare as follows:

1. I am employed by KCC Class Action Services, LLC (“KCC”), located at 462 S. 4th St., Louisville, Kentucky. KCC was appointed as the Settlement Administrator in this matter and is not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. The claims submission deadline is May 16, 2018. KCC has received, to date, 221,981 claims submitted via the settlement website and mail. KCC projects that it will receive an additional 77,315 claim submissions based on the trend of claims received and its experience with thousands of other class action claims administrations. Based on this projection of additional claim submissions, KCC estimates the total value of all claims received by the claims submission deadline may be as high as approximately \$13,000,000. Following this deadline, KCC will perform a thorough review of all claims received to determine eligibility. Based on KCC's experience in class action cases such as this one, approximately 10% of claims submitted are found ineligible for various reasons.

3. The deadline to submit a request for exclusion was March 17, 2018. To date,

KCC has received one request for exclusion. *See* Exhibit A to this declaration.

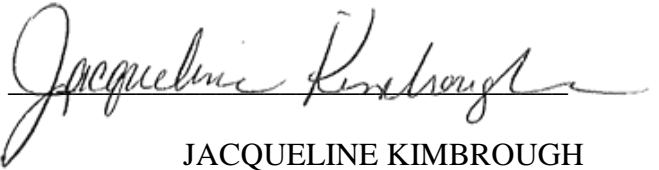
4. The deadline to submit an objection to the settlement was March 17, 2018.

Counsel has informed KCC that they received five objections, timely or otherwise. To date, KCC has received no objections.

5. KCC will employ the following standardized procedures and protocols for handling returned mail and uncashed checks to ensure that as many claimants as reasonably possible deposit their settlement checks and the amount claimed is fully distributed. In particular, KCC will do the following: (1) before mailing Cash Refunds, KCC run the addresses of all valid Claimants through the National Change of Address database system to obtain updated addresses; and (2) within a reasonable time of receiving returned mail, KCC will either (a) re-mail any Cash Refunds that are returned as non-deliverable with a forwarding address to the forwarding address, or (b) perform skip-tracing to ascertain the current mailable address of the Claimant if no forwarding address is available. Cash Refund checks will be valid for ninety (90) days after the date on the check. Unless it would result in average supplemental payments of \$10.00 or less (in which case the transaction costs become too high to economically do more), the amounts of any checks that are returned as undeliverable or that remain uncashed more than ninety (90) days after the date on the check are included as part of a pro rata redistribution to all Claimants who timely cashed their check as part of the original distribution. Cash Refunds distributed pursuant to this redistribution are valid for ninety (90) days after the date on the check.

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

Executed this 9th day of April, 2018.



JACQUELINE KIMBROUGH

EXHIBIT A

Rikos v. The Procter & Gamble Company

Timely Request for Exclusion as of April 9, 2018

FirstName **LastName**

KATIE JAEB