

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Adam Steele, Brittany Montrois, and)	
Joseph Henchman on behalf of)	
themselves and all others similarly)	
situated,)	
<i>Plaintiffs,</i>)	Civil Action No.: 1:14-cv-01523-RCL
)	
v.)	STATUS REPORT REGARDING
)	NOTICE TO THE CLASS
)	
United States of America,)	
<i>Defendant.</i>)	
_____)	

Plaintiffs Adam Steele, Brittany Montrois, and Joseph Henchman, on behalf of themselves and the Class, hereby submit this Status Report Regarding Notice to the Class, informing the Court of the procedures undertaken by the Claims Administrator to execute the Court’s approved notice plan.

On September 9, 2016, this Court issued its Order Approving Plan of Class Notice, which provided the notice plan and established that “[t]he opt-out period shall expire on December 7, 2016.” ECF No. 68, at 2. The Declaration of Kathleen Wyatt Regarding Notice Procedures (“Wyatt Decl.”), attached hereto as Exhibit 1, summarizes the steps taken by the Claims Administrator to comply with the Order, including the following:

1. Obtaining a list of 1,227,683 name and address records on August 23, 2016 (Wyatt Decl. ¶ 2);
2. Causing the approved Email Notice to be emailed to 1,222,165 potential class members on October 7, 2016 (*Id.* ¶ 3);
3. Creating, before October 7, 2016, a case-dedicated website for the matter (www.PTINClassAction.com), providing access to the long-form notice, relevant court

documents, important dates, answers to frequently asked questions, and contact information for the Claims Administrator and Class Counsel (*Id.* ¶ 4);

4. Creating, before October 7, 2016, a toll-free telephone number with recorded information and answers to frequently asked questions (*Id.* ¶ 5);

5. Causing, on October 21, 2016, the approved Postcard Notice to be mailed to 150,351 potential class members without valid email addresses whose addresses were confirmed with the National Change of Address (*Id.* ¶¶ 7–8); and

6. Remailing 11,050 of the 15,248 Postcard Notices returned as undeliverable after updating addresses with a skip trace vendor (*Id.* ¶ 9).

As a result of these steps, the Claims Administrator received 1,064 timely requests from potential class members for exclusion from the class, as well as eleven late requests. *Id.* ¶ 10. Those eleven late requests were accepted by this Court in its January 25, 2017 Order Accepting Untimely Opt-Out Requests. ECF No. 76.

Dated: January 31, 2017

Respectfully submitted,

By: /s/ William H. Narwold
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*Attorneys for Plaintiffs Adam Steele, Brittany
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CERTIFICATE OF SERVICE

I, William H. Narwold, declare that I am over the age of eighteen (18) and not a party to the entitled action. I am a member of the law firm MOTLEY RICE LLC, and my office is located at 20 Church Street, 17th Floor, Hartford, CT 06103.

On January 31, 2017, I caused to be filed the following in the above-captioned case:

Status Report Regarding Notice to the Class

with the Clerk of Court using the Official Court Electronic Document Filing System, which served copies on all interested parties registered for electronic filing.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 31, 2017

By: /s/ William H. Narwold
MOTLEY RICE LLC