

7/8/2025 10:26:53 AM

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO – UNLIMITED CIVIL**

**MIRAY ATAMIAN, Individually and on
behalf of all others similarly situated,**

Plaintiff,

v.

**OLAPLEX, INC.; and OLAPLEX
HOLDING, INC.,**

Defendants.

Case No. 37-2024-00018492-CU-BT-CTL

CLASS ACTION

**FIRST SUPPLEMENTAL
DECLARATION OF CHRISTOPHER
LEUNG OF SIMPLURIS, INC.
REGARDING FINAL CLAIMS
NUMBERS**

[IMAGED FILE]

Date: July 11, 2025

Time: 9:30 a.m.

Dept.: C-72

I, CHRISTOPHER LEUNG, declare as follows:

1 1. I am employed as a Project Manager by Simpluris, Inc. (“Simpluris”), the settlement
2 administrator in the above-entitled action. Our corporate office address is 3194-C Airport Loop
3 Dr., Costa Mesa, CA 92626. I am over twenty-one years of age and authorized to make this
4 declaration on behalf of Simpluris and myself. I have personal knowledge of the information set
5 forth herein.

6 I submit this Declaration to supplement the Declaration of Jacob Kamenir of Simpluris, Inc.
7 regarding Notice and Settlement Administration (“Notice Declaration”), which was executed on
8 June 4, 2025, and to provide the Court with an update regarding information relating to the
9 participation rates for the Settlement, as of July 8, 2025.

10 **SETTLEMENT ADMINISTRATION**

11 2. *Claim Forms.* The claims filing deadline was May 12, 2025. As described below, a total of
12 109,896 claims have been received by Simpluris as of July 8, 2025, of which 1,613 were received
13 after the claims filing deadline.

- 14 a. *Paper Claim Forms.* The two-page Claim Form was made available on the Settlement
15 Website for Class Members who prefer not to file a claim online. As of July 8, 2025,
16 Simpluris has received 4,792 Paper Claim Form submissions. Of the 4,792 Paper Claim
17 Form submissions, 4,044 are timely and valid, 229 are duplicate, 113 are invalid, and 406
18 are untimely.
- 19 b. *Postcard Claim Forms.* The tearaway postcard Claim Form was mailed directly to
20 Settlement Class Members. As of July 8, 2025, Simpluris has received 2,236 Postcard
21 Claim Form submissions. Of the 2,236 Postcard Claim Form submissions, 2,141 are
22 timely and valid, 23 are duplicate, 27 are invalid, and 45 are untimely.
- 23 c. *Known Settlement Class Member Online Claim Forms.* The Settlement Website contained
24 a “Submit a Claim” module for known Class Members to log in and submit their claim
25 online. As of July 8, 2025, Simpluris has received 5,896 online Claim Form submissions.
26 Of the 5,896 online Claim Form submissions, 5,885 are timely and valid, 2 are duplicate,
27 and 9 are untimely.
- 28 d. *Unknown Settlement Class Member Online Claim Forms.* The Settlement Website also
contained a “Submit a Claim” module for initially unknown Class Members to
electronically complete and submit a claim form online without having to log in. As of

July 8, 2025, Simpluris has received 96,972 online Claim Form submissions from previously unknown Class Members. Of the 96,972 online Claim Form submissions, 82,211 are timely and valid, 14,087 are deemed fraudulent, 9 are duplicate, and 665 are untimely.

3. *Claims Processing.* Of the 109,896 total claims received, 108,283 are determined to be timely. Of the 108,283 timely claims, 94,281 are determined to be valid, 13,623 are deemed fraudulent, 242 are duplicate submissions, and 137 are invalid.
4. Of the 109,720 total claims received, 1,613 are determined to be untimely. Of the 1,613 untimely claims, 464 are deemed fraudulent, 21 are duplicate submissions, three (3) is invalid because the checkbox in Section II on the Paper Claim Form was left blank, and 1,125 are otherwise valid and complete.
5. Therefore, were the Court to accept the 1,125 untimely claims that are otherwise valid and complete, a total of 95,238 claims (i.e., 94,281 + 1,125 = 95,406) would be honored under the Settlement.
6. *Quality Assurance.* Simpluris completed a full and final analysis of all Online Claim Form submissions, invalidating claims using a programmatic multi-factor analysis considering, but not limited to, the following data points:
 - a. Claim Form Email Address Elements: email addresses provided as part of submitted Claim Forms were analyzed for several “suspicious activity” factors including:
 - i. Validity and formatting
 - ii. Domain associations
 - iii. Relation to claimant name(s)
 - iv. Age of email address
 - v. Correlation or relationship between other submitted claims
 - b. IP Address Elements: IP addresses associated with the submitted Claim Forms were analyzed for several “suspicious activity” factors including:
 - i. Known suspicious IP addresses
 - ii. Frequency and/or prevalence of IP address between other submitted claims
 - iii. Location of IP address in relation to the claimant’s State provided of submitted Claim Forms

- 1 7. None of the elements and/or patterns described in Paragraph 7 were used to determine fraudulent claims on
2 their own; rather, each identified “suspect” element and/or pattern contributed to Simpluris’ holistic
3 evaluation of each claim.
- 4 8. *Exclusion Requests.* The deadline to file a request for exclusion from the Settlement was May 12,
5 2025. As of July 8, 2025, Simpluris has received no additional opt-outs from the date of the
6 Notice Declaration. As of July 8, 2025, there are 264 exclusion requests received, 253 are valid
7 and 11 are invalid.
- 8 9. *Objections.* The deadline to file an Objection to the Settlement was May 12, 2025. As of July 8,
9 2025, Simpluris has received two (2) additional objections to the Settlement from the date of the
10 Notice Declaration, for a total of five (5) objections. Simpluris received an objection from Tera
11 Alexander postmarked May 13, 2025, and an objection from Lisa Distefano postmarked May 21,
12 2025. Both objections are untimely with respect to objections to the fairness of the proposed
13 Settlement. However, to the extent they offer objections to the motion for attorneys’ fees, costs
14 and service award, those objections would be timely based on the Court’s extended deadline of
15 June 27, 2025, to object to that motion. Tera Alexander is part of the previously unknown
16 Settlement Class and Lisa Distefano is part of the Claim-In Settlement Class. Neither of these two
17 individuals submitted a Claim Form.

18 I declare under penalty of perjury under the laws of the state of California that the foregoing is
19 true and correct to the best of my knowledge, and that this declaration was executed on July 8, 2025.

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22 Christopher Leung
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