

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SVETLANA SHOLOPA and MILICA
MILOSEVIC, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

TURK HAVA YOLLARI A.O. (d/b/a Turkish
Airlines, a foreign corporation), and TURKISH
AIRLINES, INC., a New York Corporation,

Defendants.

Case No. 1:20-cv-03294-ALC

Hon. Andrew L. Carter

SUPPLEMENTAL DECLARATION OF
BRONYN HEUBACH ON NOTICE
PLAN AND SETTLEMENT
ADMINISTRATION

I, Bronyn Heubach, hereby declare and state as follows:

1. I am an Assistant Director at JND Legal Administration. JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience in all aspects of legal administration and has administered class actions in hundreds of cases.

2. JND is serving as the Settlement Administrator in the above-captioned litigation (the “Action”) pursuant to the Court’s Order Granting Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, filed April 4, 2023 (ECF 86).

3. This Declaration supplements the Declaration of Bronyn Heubach on Notice Plan and Settlement Administration, filed June 29, 2023 (ECF 93) (“Initial Notice Declaration”), and provides an update on the claims administration process.

SETTLEMENT WEBSITE AND OTHER CLASS MEMBER NOTICE

Settlement Website

4. As described in the Initial Notice Declaration, on May 15, 2023, JND launched an interactive, case-specific Settlement Website at www.TASettlement.com, and this URL was listed in the Direct Notices.

5. As of the date of this Declaration, the Settlement Website has tracked a total of 41,295 unique users who registered 169,353 page views. JND will continue to update and maintain the Settlement Website throughout the settlement administration process.

Settlement Administrator Toll-Free Number

6. As described in the Initial Notice Declaration, on May 15, 2023, JND launched a 24-hour, toll-free information line that Class Members can call to obtain pre-recorded information about the Settlement.

7. As of the date of this Declaration, JND has received 876 calls to the toll-free number. JND will continue to maintain and update the toll-free number throughout the settlement administration process.

CLAIMS RECEIVED

8. As described in the Initial Notice Declaration, Class Members may file claims electronically through the Settlement Website or via postal mail. The deadline to file claims is August 18, 2023.

9. As of the date of this Declaration, JND has received a total of 10,860 Claim Forms. Of these Claim Forms, 5,775 included claims for refunded tickets and 5,085 included claims for non-refunded tickets. JND continues to receive and process Claim Form submissions and will continue to report to Counsel on the status of the claim intake and review.

OBJECTIONS

10. As described in the Initial Notice Declaration and as of the date of this Declaration, JND received one (1) objection.

REQUESTS FOR EXCLUSION

11. The Notices also informed Class Members of their right to opt out of the Settlement by submitting a written request for exclusion postmarked by July 17, 2023. We anticipate we may continue to receive timely opt-outs in the mail due to postal delays, and JND will promptly report to Counsel any additional exclusion requests that are received.

12. As of the date of this Declaration, JND has received forty (40) requests for exclusion, of which three have been withdrawn. A list of exclusion requests is attached as Exhibit A.

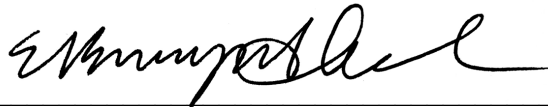
CLAIMS ADMINISTRATOR EXPENSES

13. JND, as the Court-appointed Settlement Claims Administrator in this matter, has incurred fees and expenses in administering this Settlement including, but not limited to, preparing and disseminating Class Notice and CAFA Notice, responding to inquiries from Settlement Class Members, creating and maintaining a Settlement Website, receiving and processing Claim Forms, and maintaining all Claims and other Settlement Agreement-related data through the conclusion of the settlement administration process.

14. As of the date of this Declaration, JND has incurred fees and expenses in the amount of \$249,477.39, of which approximately \$120,000 is associated with the supplemental media campaign that was described within the Initial Notice Declaration.

15. JND will continue perform the services and administrative duties as directed by the parties and the Court in this Settlement. JND estimates that remaining fees and expenses over the next 12 months and through the conclusion of the Settlement will be \$185,000.

I declare under penalty of perjury that the foregoing is true and correct. Executed July 19, 2023, at Seattle, Washington.



BRONYN HEUBACH

EXHIBIT A

TURKISH AIRLINES SETTLEMENT
Exclusion Requests
(as of July 19, 2023)

#	Name
1	ROBERTA AGUIARI
2	NANCYHESHAM ALSHELLEH
3	KATHERINEMARIE ANDERSON
4	ALYSSA NICOLE BEDARD
5	VICKEY R CHRISTOPHER
6	WILLIE RAY CHRISTOPHER
7	ASEFEMIR COBAN
8	MARIKA CVETKOVSKA
9	YASEMIN DORMEN
10	MARQUESALLAN DUNHAM
11	BRIANNAGAIL GEORGIE
12	VERA GOLUBTSOVA
13	BRENDALOU HAMMONDS
14	RONNIELYNN HAMMONDS
15	NESLIN KOSEOGLUCOBAN
16	MARIA MATSI
17	DALIA MOHAMEDAYMANSALAMA AHMED
18	JAMES ANTHONY NEAL
19	JOANNE NEAL
20	ATHANASIOS PAPADOPOULOS
21	SEMEEN PARVAIZ
22	TEENAMARIE PHILLIPS
23	EMILY ANNE PIQUES
24	ALBERTO PONZINI
25	MARCO PONZINI
26	VALENTINA RAIKO
27	ZACHARYDOYLE ROWLEY
28	RACHEL SCHEMENAUR
29	RISHAT SITDIKOV
30	LILIYA SITDIKOVA
31	ISAAC SSEMAGANDA
32	GHEORGHE VASILE
33	LINA VASILE
34	CRISTINA VISCONTI
35	ASUMAN YILMAZ
36	GIORGIO ZUCCHI
37	LUCA ZUCCHI