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12 and for the Proposed Class Appear on the Signature Page)*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF ARIZONA**

15 Miguel Avila, on Behalf of Himself and All
16 Others Similarly Situated,

17 Plaintiffs,

18 v.

19 LifeLock Inc., Todd Davis, Chris G.
20 Power, and Hilary A. Schneider,

21 Defendants.

CASE NO. 2:15-cv-01398-SRB

CLASS ACTION

**REPLY MEMORANDUM OF
POINTS AND AUTHORITIES
IN FURTHER SUPPORT OF
MOTION FOR FINAL
APPROVAL OF CLASS
ACTION SETTLEMENT AND
PLAN OF ALLOCATION AND
MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND
PAYMENT OF EXPENSES**

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1 Pursuant to Rules 23(e) and 54(d) of the Federal Rules of Civil Procedure, Lead
 2 Plaintiffs Oklahoma Police Pension and Retirement System and Oklahoma Firefighters
 3 Pension and Retirement System (together, “Lead Plaintiffs”), on behalf of themselves and
 4 all members of the proposed Settlement Class, and Bernstein Liebhard LLP and Labaton
 5 Sucharow LLP (together, “Lead Counsel”), respectfully submit this reply memorandum in
 6 further support of (i) Lead Plaintiffs’ Motion for Final Approval of Class Action
 7 Settlement and Plan of Allocation (ECF No. 139); and (ii) Lead Counsel’s Motion for an
 8 Award of Attorneys’ Fees and Payment of Expenses (ECF No. 140) (collectively, the
 9 “Motions”).¹

PRELIMINARY STATEMENT

11 Now that the June 30, 2020 deadline for objections and requests for exclusion from
 12 the Settlement Class has passed, Lead Plaintiffs and Lead Counsel respectfully submit that
 13 the reaction of the Settlement Class to the Settlement, Plan of Allocation, and Lead
 14 Counsel’s motion for attorneys’ fees and litigation expenses has been overwhelmingly
 15 positive. A total of 58,568 Notices with Claim Forms (“Notice Packets”) have been
 16 mailed to potential Settlement Class Members or their nominees through July 13, 2020.
 17 *See* Supplemental Declaration of Luiggy Segura Regarding (A) Update on Mailing of the
 18 Notice Packets; (B) Requests for Exclusion and Objections; and (C) Claims Received to
 19 Date, dated July 13, 2020, at ¶ 4, filed herewith (“Supp. Mailing Decl.”). There has been
 20 only one request for exclusion, by an investor who purchased 100 shares but ultimately
 21 made a profit and does not want to participate, and no objections to the substance of the
 22 Settlement or the proposed Plan of Allocation for the proceeds of the Settlement. Lead
 23 Counsel received one objection from an individual investor who received his Notice
 24 Packet on June 15, 2020, two weeks before the objection and exclusion deadline (the
 25 “Objector”). *See* ECF No. 142. He objects to the timing of his notice and to Lead
 26

27 ¹ All capitalized terms not otherwise defined herein have the meanings set forth in the
 28 Stipulation and Agreement of Settlement, dated as of March 27, 2020 (the “Stipulation”),
 previously filed with the Court, ECF No. 137-2, or in the opening motions.

1 Counsel’s request for attorneys’ fees. No institutional investor, pension fund, or attorney
2 general requested exclusion from the Settlement or objected to any aspect of the
3 Settlement, the Plan of Allocation, or the Fee and Expense Application.

4 Overall, Lead Plaintiffs and Lead Counsel respectfully submit that the reaction of
5 the Settlement Class strongly supports approval of the Settlement, the Plan of Allocation,
6 and the requested attorneys’ fees and expenses.

7 **MEMORANDUM OF POINTS AND AUTHORITIES**

8 **ARGUMENT**

9 **I. THE REACTION OF THE SETTLEMENT CLASS STRONGLY**
10 **SUPPORTS APPROVAL OF THE SETTLEMENT AND THE FEE**
11 **AND EXPENSE APPLICATION**

12 Pursuant to the Court’s Preliminary Approval Order, the Claims Administrator has
13 mailed 58,568 Notice Packets to all potential Settlement Class Members identified by
14 Defendants and nominees. *See* Supp. Mailing Decl. at ¶ 4. The Notice informed
15 Settlement Class Members of the terms of the proposed Settlement and Plan of Allocation,
16 and that Lead Counsel would apply for an award of attorneys’ fees in an amount not to
17 exceed 30% of the Settlement Fund and payment of litigation expenses in an amount not to
18 exceed \$350,000. The Notice also apprised Settlement Class Members of their right to
19 seek exclusion from the Settlement Class or object to the proposed Settlement, the Plan of
20 Allocation, and/or the request for attorneys’ fees and payment of litigation expenses, and
21 the June 30, 2020 deadline for doing so.

22 In addition, copies of the Notice, Claim Form, Stipulation, and Preliminary
23 Approval Order were posted on the website specifically created for this Settlement
24 (www.LifeLockSecuritiesLitigation.com). *See* ECF No. 141-3 at ¶ 16. On May 4, 2020,
25 the Claims Administrator published the Summary Notice in *Investor’s Business Daily* and
26 released it over the Internet via *PR Newswire* (*id.* at ¶ 14), informing readers of the
27 proposed Settlement, how to obtain copies of the Notice and Claim Form, and the
28 deadlines for the submission of Claim Forms, objections, and exclusion requests. On June
16, 2020, Lead Plaintiffs and Lead Counsel filed motions in support of final approval and

1 fees, which are available on the court docket (*see* ECF Nos. 139-141) and the settlement
2 website. Those papers further detailed Lead Plaintiffs’ and Lead Counsel’s views of the
3 Settlement, work performed in this litigation, risks of the litigation, and the fee and
4 expense award requested.

5 After providing notice to tens of thousands of Settlement Class members, only one
6 Settlement Class member objected and only one person requested exclusion. This reaction
7 is a significant factor in assessing the Settlement’s fairness and adequacy. “[T]he
8 absence of a large number of objections to a proposed class action settlement raises a
9 strong presumption that the terms of a proposed class settlement action are favorable to the
10 class members.” *In re Apollo Grp. Inc. Sec. Litig.*, No. 04-2147, 2012 WL 1378677, at *3
11 (D. Ariz. Apr. 20, 2012) (citation omitted); *see also In re LifeLock, Inc. Mktg. & Sales*
12 *Practices Litig.*, No. MDL 08-1977-MHM, 2010 WL 3715138, at *6 (D. Ariz. Aug. 31,
13 2010) (noting that the “incredibly sparse group” of class members who opted out or
14 objected indicates that the vast majority of the class found the settlement fair and
15 reasonable). “Moreover, the absence of objections from sophisticated institutional
16 investors who have the means and incentive to object to an inadequate settlement, if they
17 deem it in their interests to do so, is a significant indicator of a proposed settlement’s
18 fairness. *See In re Cathode Ray Tube (CRT) Antitrust Litig.*, No. 1917, 2017 WL 2481782,
19 at *4 (N.D. Cal. June 8, 2017) (absence of any entity objection supports “the inference that
20 the class approves of the settlement is even stronger”).

21 Similarly, the lack of requests for exclusion reflects the Settlement Class’s approval
22 of the Settlement and offers clear support for the Court’s final approval thereof. *See, e.g.,*
23 *Wood v. Ionatron, Inc.*, No. CV 06-354-TUC-CKJ, 2009 WL 10673479, at *5 (D. Ariz.
24 Sept. 28, 2009) (noting that the reaction of the settlement class supports final approval of a
25 securities class action settlement where only one class member requested exclusion).
26 Here, only one request for exclusion was received; however, it represents only 100 shares,
27 which the requester recognized a profit on. *See* Supp. Mailing Decl., Exhibit A. Because
28 she was not damaged, she says she does not wish to participate. *Id.*

1 The low level of objections to the Fee and Expense Application is also strong
 2 evidence that those requests are fair and reasonable. *See, e.g., Burritt v. NutraCea*, No.
 3 CV-09-00406-PHX-FJM, 2010 WL 8759338, at *1 (D. Ariz. Oct. 4, 2010) (awarding
 4 counsel’s request for attorneys’ fees in securities class action and noting that there were
 5 only two objections to the request, which were overruled); *In re Nuvelo, Inc. Sec. Litig.*,
 6 No. C 07-047056 CRB, 2011 WL 2650592, at *3 (N.D. Cal. July 6, 2011) (finding one
 7 objection to a fee request to be “a strong, positive response from the class”). And once
 8 again, the lack of any objections from “‘sophisticated’ institutional investors that had
 9 considerable financial incentive to object had they believed the requested fees were
 10 excessive” and did not do so, also supports approval. *See, e.g., In re Schering-Plough*
 11 *Corp. Enhance ERISA Litig.*, No. 08-1432 (DMC)(JAD), 2012 WL 1964451, at *6 (D.N.J.
 12 May 31, 2012) (“The lack of objections to the requested attorneys’ fees supports the
 13 request, especially because the settlement class includes large, sophisticated institutional
 14 investors.”); *In re Bisys Sec. Litig.*, No. 04 Civ. 3840 (JSR), 2007 WL 2049726, at *1
 15 (S.D.N.Y. July 16, 2007) (institutional investors “had the means, the motive, and the
 16 sophistication to raise objections if they thought the . . . fee was excessive”).

17 Here, only one individual has submitted an objection – which, as explained below,
 18 does not have merit. This level of objection “presents the most compelling argument
 19 favoring settlement.” *Arnold v. Fitflop USA, LLC*, No. 11-CV-0973 W(KSC), 2014 WL
 20 1670133, at *8 (S.D. Cal. Apr. 28, 2014) (small number of objections “indicat[ed] that the
 21 vast majority of Class Members and other concerned parties are likely satisfied with the
 22 resolution of this case”).

23 **II. THE OBJECTION DOES NOT HAVE ANY MERIT**

24 The sole objection was submitted by an individual investor who appears to have
 25 purchased 780 LifeLock shares during the Class Period.² *See* ECF No. 142 at 1. His
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27
 28 ² The objection is timely but failed to include transactional documentation as required
 by the Notice and the Preliminary Approval Order. He did submit a Claim Form to the

1 primary complaint is that he received his Notice Packet on June 15, giving him “only 14
2 days, and nine business days” to submit his objection – eight days of which were during a
3 vacation. *Id.* at 2. He argues that “[p]roviding class members nine business [days] to
4 complete a claim form³ is unfair and clearly inconsistent with other class action settlement
5 claim processes. . . .” He further argues that Lead Counsel should have anticipated this
6 delay and their failure to do so “was likely designed to stifle objections. It is a clear
7 indication that class counsel was not acting in the interest of the class. . . .” *Id.* at 2. Given
8 his dissatisfaction with Lead Counsel’s work, he goes on to object to the requested fee as
9 excessive, stating, without support, that counsel’s rates “are far above the rates typically
10 charged for similar matters in this court” and not justified by the result achieved.

11 The substance of the objection does not have merit for three main reasons. First,
12 there is nothing nefarious about the amount of time allowed for the Settlement Class to
13 object, and the notice procedures here follow those consistently approved in securities
14 class actions – with the deadlines to object here actually *longer* than in other similar class
15 actions. Second, counsel’s rates are less than, or comparable to, defense firm rates in
16 specialized, commercial matters. *See* Joint Decl., Exhibit 9, ECF No. 141-9. Third, the
17 multiplier here is just about even with counsel’s lodestar – a 1.02 multiplier – and with
18 counsel continuing to do substantial work in the future on the claims and distribution
19 process, without seeking any remuneration from the Court or the Settlement Class for this
20 additional work, the multiplier will likely be negative after all is said and done. Each of
21 these reasons for the objection’s deficiency is expanded upon below.

22 As to the objection deadline, it is unfortunate that the Objector was unhappy with
23 the amount of time he had to prepare his objection, but he had sufficient time and more
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26
27 Claims Administrator on June 17, 2020 with trading documentation. *See* Supp. Mailing
Decl. ¶ 14.

28 ³ The Objector seems to be referring to filing an objection and not a Claim Form, as
the Objector had at least 31 days to submit a Claim Form.

1 than a month before the upcoming July 21, 2020 Settlement Hearing. Indeed, he was able
2 to submit a timely objection to the Court, and Claim Form to the Claims Administrator
3 using the online portal within 2 days after receiving the Notice (a claim which is in good
4 standing). Supp. Mailing Decl. at ¶ 14.⁴ Contrary to there being some nefarious scheme
5 on Lead Counsel’s part, the Objector’s broker was indeed timely mailed a Notice Packet
6 on April 24, 2020, as explained in the Supplemental Mailing Declaration. *Id.* at ¶ 8.⁵
7 However, the broker did not provide the Objector’s mailing information until May 22,
8 2020. A Notice Packet was mailed to the Objector on June 11, 2020, after the Claims
9 Administrator completed the processing of the mailing data. *Id.* at ¶¶ 10-13.

10 Contrary to the Objector’s unfounded assertions, it is indeed anticipated that there
11 can be delays with nominees providing mailing information. Accordingly, extra time was
12 added to the process. Here, pursuant to the Preliminary Approval Order, the Notice
13 mailings began on April 24, 2020 and the objection and exclusion deadline was June 30,
14 2020. This is an interval of 67 days. The interval between the notice date and the July 16,
15 2020 claim deadline is 84 days. *Id.* at ¶ 15. The interval between the notice date and the
16 July 21, 2020 hearing is 88 days.

17 To satisfy the requirements of due process and Rule 23, notice must be “reasonably
18 calculated, under all the circumstances, to apprise interested parties of the pendency of the
19 action and afford them an opportunity to present their objections.” *Phillips Petroleum Co.*

20 _____
21 ⁴ Notably, though the Objector stated that compliance with the deadlines was
22 “particularly challenging for retail investors such as myself who would be forced to
23 identify 5-year old statements,” the Objector provided trade documentation to the Claims
Administrator within 2 days of receiving the Notice Packet.

24 ⁵ As is typical in securities class actions, most beneficial purchasers of LifeLock
25 common stock during the Class Period were not record holders of the stock. Instead, their
26 shares were held in “street name” through nominee owners (*i.e.*, brokers, banks, or similar
27 institutions), and Lead Counsel and the Claims Administrator depended on these nominees
28 to identify the potential class members, through standard procedures established in the
Court’s April 10, 2020 Preliminary Approval Order (ECF No. 138, at ¶ 9). *See also*
Declaration of Luiggy Segura Regarding (A) Mailing of the Notice and Proof of Claim;
(B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion
Received, dated June 11, 2020, ¶ 7 (ECF No. 141-3).

1 v. *Shutts*, 472 U.S. 797, 812 (1985); *see also Mendoza v. Tucson Sch. Dist. No. 1*, 623 F.2d
2 1338, 1351 (9th Cir. 1980). These standards do not require that actual notice be received
3 by all class members. *See Briseno v. ConAgra Foods, Inc.*, 844 F.3d 1121, 1128 (9th Cir.
4 2017) (“neither Rule 23 nor the Due Process Clause requires actual notice to each
5 individual class member”); *Silber v. Mabon*, 18 F.3d 1449, 1454 (9th Cir. 1994) (affirming
6 district court’s holding that the appropriate standard for notice is the “best notice
7 practicable” not “actual notice”); *In re Prudential Sec. Inc. Ltd. P’ships Litig.*, 164 F.R.D.
8 362, 368 (S.D.N.Y.), *aff’d*, 107 F.3d 3 (2d Cir. 1996) (“[F]or the due process standard to
9 be met it is not necessary that every class member receive actual notice, so long as class
10 counsel acted reasonably in selecting means likely to inform persons affected.”); *Torrisi v.*
11 *Tucson Elec. Power Co.*, 8 F.3d 1370, 1374-75 (9th Cir. 1993) (notice sufficient even
12 though as many as one-third of shareholders may have received it after opt-out and
13 objection deadline due to nominee delays).

14 Not only did the notice procedures here follow those consistently approved in
15 securities class actions, but also the time permitted to distribute notices through nominees
16 was more than reasonable. The initial mailing began on April 24, 2020—67 days before
17 the objection/exclusion deadline, 84 days before the claim-filing deadline, and 88 days
18 before the Settlement Hearing—far longer than periods that have been found reasonable by
19 other courts. *See, e.g., Silber*, 18 F.3d at 1452-54 (approving of notice mailed 41 days
20 before deadline); *Fidel v. Farley*, 534 F.3d 508, 514 (6th Cir. 2008) (approving of notice
21 mailed to brokers 46 days before opt-out and objection deadline); *DeJulius v. New*
22 *England Health Care Emps. Pension Fund*, 429 F.3d 935, 946-47 (10th Cir. 2005)
23 (approving of notice mailed 32 days before opt-out and objection deadline).

24 With respect to his objection to the request for attorneys’ fees, the Court is
25 respectfully referred to Lead Counsel’s Memorandum of Points and Authorities in support
26 of the request (“Fee Brief”) and the Joint Declaration for a full discussion of the merits of
27 the request, which Lead Counsel submit is reasonable and warranted under the
28 circumstances here. ECF Nos. 140-141. As explained in Lead Counsel’s motion, fees of

1 30% in contingent common fund settlements are regularly approved within the Ninth
 2 Circuit and this district. *Id.* at 13-14. Lead Counsel's rates are overall actually less than,
 3 or comparable to, defense firm rates for comparable commercial litigation. The hourly
 4 rates of Plaintiffs' Counsel here range from \$725 to \$1,150 for partners, \$650 to \$900 for
 5 of counsel or senior counsel, and \$335 to \$650 for associates and other attorneys. *See* ECF
 6 Nos. 141-5, 141-6, 141-7. Lead Counsel submitted a table of hourly rates for defense
 7 firms compiled by Labaton Sucharow from fee applications submitted by such firms
 8 nationwide in bankruptcy proceedings in 2019. *See* ECF No. 141-9. The analysis shows
 9 that across all types of attorneys, Plaintiffs' Counsel's rates here are consistent with, or
 10 lower than, the firms surveyed. Finally, if approved, the fee request would result in a very
 11 modest "multiplier" over Plaintiffs' Counsel's lodestar of 1.02 – meaning just 2% more
 12 than lodestar. Although Plaintiffs' Counsel's fee motion was filed in mid-June based on
 13 time up to May 31, 2020, their work continues (and their lodestar will increase) through
 14 the distribution of the Settlement and they will seek no additional compensation. Thus, the
 15 multiplier will likely be negative here, further supporting the reasonableness of the request.

16 For all the foregoing reasons, it is respectfully submitted that the objection has no
 17 merit and should be denied.

18 CONCLUSION

19 For the reasons set forth above and in Lead Plaintiffs' and Lead Counsel's June 16,
 20 2020 submissions, Lead Plaintiffs and Lead Counsel respectfully request that the Court
 21 enter the proposed Final Order and Judgment, submitted herewith; enter the proposed
 22 Order Approving Plan of Allocation, submitted herewith; and enter the proposed Order
 23 Awarding Attorney's Fees and Payment of Expenses, submitted herewith.

24 Dated: July 14, 2020

Respectfully submitted,

26 **LABATON SUCHAROW LLP**

27 */s/ Carol C. Villegas*

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CERTIFICATE OF SERVICE

I, Carol C. Villegas, hereby certify that a true copy of the foregoing document filed through the ECF system on July 14, 2020, will be electronically sent to the registered participants as identified on the Notice of Electronic Filing, and paper copies will also be sent to those indicated as non-registered participants.

/s/ Carol C. Villegas _____
CAROL C. VILLEGAS