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11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

14
15 MICHAEL LAVIGNE, *et al.*,
16 Plaintiffs,
17 vs.
18 HERBALIFE LTD., *et al.*,
19 Defendants.

CASE NO. 2:18-cv-07480-JAK (MRWx)
[Related Case 2:13-cv-02488-BRO-RZ]

**DECLARATION OF ERIC MILLER
OF A.B. DATA IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Assigned to Hon. John A. Kronstadt,
Courtroom 10B

1 I, Eric Miller, declare:

2 1. I am a Senior Vice President with A.B. Data, Ltd. (“A.B. Data”). A.B.
3 Data has been selected by the parties to act as the Claims Administrator. I am fully
4 familiar with the facts contained herein based upon my personal knowledge, and if
5 called as a witness, could and would testify competently thereto.

6 2. Pursuant to the Stipulation of Settlement (the “Settlement Agreement”),
7 A.B. Data was responsible for sending the Notice of Proposed Class Action
8 Settlement (the “Notice”) to potential Settlement Class Members via email and
9 postal mail. A copy of the postcard and email Notices are attached hereto as **Exhibit**
10 **A** and **Exhibit B**, respectively.

11 3. On April 11, 2023, A.B. Data received from Counsel for the Defendant
12 a list containing the name, address, email address, and distributor information in
13 Defendants’ records for 2,841,430 U.S. Herbalife distributors during the Class
14 Period (the “Class List”). This enabled A.B. Data to provide direct notice to the
15 millions of individuals who were active Herbalife distributors between 2009 and
16 2023, without limiting the notice to those that attended an event. In addition,
17 Defendant provided the Claims Administrator a file containing information about
18 Herbalife Corporate Events and those potential Settlement Class Members who
19 attended each Event (the “Events File”). The Events File identified 79,701
20 distributors that attended two or more corporate events and 69,144 distributors that
21 attended only one Corporate Event. The Events File also reflected that the total
22 amount of ticket sales for Herbalife Corporate Events during the Class Period was
23 \$64,806,158.00.

24 4. Prior to the initial mailing of the Notices to potential Settlement Class
25 Members, A.B. Data standardized and updated the mailing addresses for the Class
26 List using the National Change of Address (“NCOA”) system maintained by the
27 United States Postal Service (“USPS”) in an effort to improve deliverability rates.

28

1 included copies of all of Exhibits identified in the cover letter.

2 **WEBSITE AND TOLL-FREE NUMBER**

3 12. On May 5, 2023, A.B. Data established a case-dedicated website for
4 this Action, www.herbalifeactionsettlement.com. The website provides
5 summary information and access to important documents related to the Action
6 including the Amended Complaint, the Motion for Preliminary Approval, the
7 Settlement Agreement, the Notice, and the Preliminary Approval Order. In addition,
8 the website provides information concerning the current status of the Settlement, the
9 claim-, exclusion-, and objection-filing deadlines, contact information for Class
10 Counsel, and the date and time of the Court's Final Approval Hearing. The website
11 also has information about the Settlement available in Spanish. The website also
12 provided potential Settlement Class Members with the ability to submit the Claim
13 Form online up until the Claim Form deadline on August 4, 2023. A.B. Data
14 regularly updated the Settlement Website with pertinent filings shortly after those
15 papers were filed with the Court. The website is accessible 24 hours a day, 7 days a
16 week. As of the date of this Declaration, the website has been viewed over 150,000
17 times. A.B. Data will continue to maintain the Settlement Website and post updates
18 and Court files as needed.

19 13. On May 5, 2023, A.B. Data caused the toll-free number 1-866-217-
20 4455 to be opened to the public. The line features recorded information about the
21 Settlement, including answers to frequently asked questions. Callers also have the
22 option to speak with a live customer service representative in English or Spanish. As
23 of the date of this Declaration, A.B. Data has received 2,787 calls. In addition to the
24 toll-free number, claimants are also provided with an email address to submit
25 inquiries. As of the date of this Declaration, A.B. Data has received 879 emails to
26 the case specific email address.

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1 and validate the claimant's status as a Settlement Class Member. There are 4,009
2 claimants that A.B. Data linked to distributor records with \$5,726,383.00 in event
3 purchases. A.B. Data preliminarily believes these claims are valid claims.

4 20. Claim Forms submitted without a Unique ID are going through an
5 additional screening process to verify eligibility to participate in the Settlement.
6 A.B. Data's initial review has identified 44,241 ineligible claims where the claimant
7 only listed the purchase of a ticket to one event (the Class is limited to U.S.-based
8 distributors attending two or more events) and 4,062 claimants that submitted claims
9 without providing any event purchases. In addition, 8,263 claims have been
10 identified as submitting claims for more than \$750.00 and as high as several million
11 dollars. A.B. Data's understanding is that no single event is in excess of \$750.00 and
12 the event data provided by Herbalife confirms this information.

13 21. A.B. Data has witnessed an increase in the use of automated computer
14 programs or bots to submit false or fraudulent claims. These bots are programmed to
15 submit large volumes of claims with the intent of defrauding the system. A.B. Data
16 employs multiple proprietary methods to prevent and identify claims submitted by
17 fraudulent filers. So far, A.B. Data has identified 74,636 claims that exhibit
18 characteristics indicative of fraudulent submissions. A.B. Data prefers not to
19 disclose details of its proprietary methods to the public. However, I am available to
20 discuss these methods and information regarding these claims with the Court during
21 the Final Approval Hearing, under confidential seal.

22 22. Excluding those claimants eliminated through those initial filters, the
23 remaining 37,643 claims with \$10,685,335.00 in event ticket purchases for 96,230
24 events are still subject to further review.

25 23. As of the date of this Declaration, A.B. Data estimates the number of
26 qualified claimants will be between 4,009 and 37,643 with the range of ticket
27 expenditures totaling \$5,726,383.00 to \$10,685,336.00. The claims administration
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1 process will assess the validity of the remaining 33,634 individual claimants' claims
2 with an additional \$4,958,953.00 in damages.

3 24. A.B. Data will continue its review, working closely with Class Counsel
4 and Counsel for Herbalife to identify and reject any claims submitted by non-
5 Settlement Class Members.

6 **ADMINISTRATIVE FEES AND EXPENSES**

7 25. Through the ongoing settlement administration process, A.B. Data has
8 incurred administrative costs totaling \$840,269.81 to date, which is in large part
9 made up of out-of-pocket expenses related to noticing the potential Settlement Class
10 Members such as print, postage, and media. Noticing costs were greater than
11 originally anticipated due to a significantly higher number of potential Settlement
12 Class Members requiring mailing of the more costly hard copy notice as opposed to
13 email notice. A.B. Data initially estimated that 2.7 million notices would be sent via
14 email at a cost of approximately \$0.002 each and approximately 270,000 notices (or
15 10% of the potential Settlement Class Members) would require notice by First Class
16 Mail at a cost of approximately \$0.55 each based on the information available prior
17 to the commencement of notice. The final mailing list included 2.3 million records
18 with email addresses and over 460,000 records that required mailing via First Class
19 Mail. In addition, A.B. Data caused an additional 596,911 notices to be mailed to
20 those whose email notices bounced, or not delivered to the potential Settlement
21 Class Member. In aggregate, over 1.1 million notices were mailed via First Class
22 Mail resulting in an expense increase of approximately \$423,000 over the original
23 anticipated costs of approximately \$417,000. Attached hereto as **Exhibit G** are
24 invoices of A.B. Data's total fees and expenses for this matter through August 31,
25 2023.

26 26. The class action notice plan implemented for this case has proven to be
27 exceptionally successful. It effectively reached and informed the vast majority of
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1 potential Settlement Class Members, ensuring they were well-informed about the
2 litigation and their rights within it.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 8, 2023, at Palm Beach Gardens, Florida.


Eric Miller

EXHIBIT A

Have you attended a U.S.

Herbalife event?

You could receive part of a \$12.5 Million Class Action Settlement.

Para obtener información en español, visite el sitio web www.herbalifeclassactionsettlement.com/home/espanol

This is a summary of the settlement. The Settlement Agreement, the Court-approved Long-Form Notice, and other important documents are available at www.HerbalifeClassActionSettlement.com.

A Settlement has been reached with Herbalife International of America, Inc. (“Herbalife”) regarding U.S.-based events (“U.S. Herbalife Events”). Herbalife has agreed to a Settlement resolving this case.

Am I included?

You are a Settlement Class Member if at any time on or after January 1, 2009, through April 6, 2023, you purchased tickets to **two or more** U.S. Herbalife Events. You are excluded from the Settlement Class if you were a member of Herbalife’s President’s Team or above (including past and present members of Herbalife’s Chairman’s Club and Founder’s Circle) throughout the Class Period, including your spouses, heirs, predecessors, successors, representatives, alter egos, or assigns. Also excluded are any U.S. Herbalife distributors who have previously executed a release of the claims that are the subject matter of this litigation.

What does the Settlement provide?

The Settlement provides for the payment of \$12,500,000 to resolve this case on behalf of Settlement Class Members. After deductions for attorneys' fees, litigation costs, and other administrative expenses ("Net Settlement Fund"), the Net Settlement Fund will be distributed to Class Members who submit valid claims. The Settlement also requires Herbalife to make certain changes to its corporate policies and procedures regarding U.S. Herbalife Events for no less than three years from the date the Court grants final approval of this Settlement.

How can I get a payment?

To be eligible for payment, Claim Forms must be submitted electronically or postmarked no later than August 4, 2023. Please note your Notice ID Number is <<Unique ID>>. You will be requested to provide your Notice ID Number on your Claim Form, which will be used to expedite the validation of your claim submission. The Claim Form will contain the amount of money you spent purchasing tickets to U.S. Herbalife Events since January 1, 2009, and for which Herbalife has records. If you believe that you spent more money than the Claim Form states you did, and wish to claim an additional amount, you will be asked to provide the name, date, location, and cost for each additional U.S. Herbalife Event for which you purchased a ticket on or after January 1, 2009. You are not required to provide documentation with the Claim Form, but the Claims Administrator reserves the right to request additional information or documentation supporting your claim. Visit www.HerbalifeClassActionSettlement.com/Home/ClaimForm to fill out a Claim Form online or you may contact the Claims Administrator to have a Claim Form mailed to you.

What are my rights?

If you are a Settlement Class Member, even if you do nothing, you will be bound by the Court's decisions and judgments concerning the Settlement. If you want to keep your right to sue Herbalife regarding U.S. Herbalife Events, you must exclude yourself from the Settlement Class in writing by August 4, 2023. If you choose to stay in the Settlement Class, you may object to the Settlement in writing by August 4, 2023. The Settlement Agreement, the Court-approved Long-Form Notice (which includes details on how to exclude yourself or object), and other important documents are available at www.HerbalifeClassActionSettlement.com. The U.S. District Court for the Central District of California, Western Division, is scheduled to hold a hearing on October 16, 2023, at 8:30 a.m., at First Street Courthouse, 350 W. 1st Street, Courtroom 10B, Los Angeles, CA 90012, to consider whether to approve the Settlement. Class Counsel will also request at the hearing, or at a later date, attorneys' fees of up to 33 1/3% of the Settlement Fund of \$12,500,000, or \$4,166,667, plus reimbursement of costs and expenses, for investigating the facts, litigating the case, and negotiating the Settlement. You or your own lawyer may appear and speak at the hearing at your own expense, but you do not have to. The hearing may be conducted electronically or moved to a different date or time without additional notice, so it is a good idea to check www.HerbalifeClassActionSettlement.com for updates. Please do not contact the Court about this Notice.

The Court has appointed the law firms of Mark Migdal & Hayden and Mortgage Recovery Law Group, LLP as Class Counsel to represent Settlement Class Members.

EXHIBIT B

From: help@mg.abdataclassactionmail.com on behalf of Herbalife Claims Administrator
<help@mg.abdataclassactionmail.com>
Sent:
To:
Subject: Test - Herbalife Settlement Notice

EXTERNAL SENDER

Notice ID:

Have you attended a U.S. Herbalife event? You could receive part of a \$12.5 Million Class Action Settlement.

Para obtener información en español, visite el sitio web www.herbalifeactionsettlement.com/Home/espanol

This is a summary of the settlement. The Settlement Agreement, the Court-approved Long-Form Notice, and other important documents are available at www.herbalifeactionsettlement.com.

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The Settlement provides for the payment of \$12,500,000 to resolve this case on behalf of Settlement Class Members. After deductions for attorneys' fees, litigation costs, and other

administrative expenses (“Net Settlement Fund”), the Net Settlement Fund will be distributed to Class Members who submit valid claims. The Settlement also requires Herbalife to make certain changes to its corporate policies and procedures regarding U.S. Herbalife Events for no less than three years from the date the Court grants final approval of this Settlement.

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To be eligible for payment, Claim Forms must be submitted electronically or postmarked no later than August 4, 2023. Please note your Notice ID Number is . You will be requested to provide your Notice ID Number on your Claim Form, which will be used to expedite the validation of your claim submission. The Claim Form will contain the amount of money you spent purchasing tickets to U.S. Herbalife Events since January 1, 2009, and for which Herbalife has records. If you believe that you spent more money than the Claim Form states you did, and wish to claim an additional amount, you will be asked to provide the name, date, location, and cost for each additional U.S. Herbalife Event for which you purchased a ticket on or after January 1, 2009. You are not required to provide documentation with the Claim Form, but the Claims Administrator reserves the right to request additional information or documentation supporting your claim. Visit www.herbalifeactionsettlement.com/claims to fill out a Claim Form online or you may contact the Claims Administrator to have a Claim Form mailed to you.

What are my rights?

If you are a Settlement Class Member, even if you do nothing, you will be bound by the Court’s decisions and judgments concerning the Settlement. If you want to keep your right to sue Herbalife regarding U.S. Herbalife Events, you must exclude yourself from the Settlement Class in writing by August 4, 2023. If you choose to stay in the Settlement Class, you may object to the Settlement in writing by August 4, 2023. The Settlement Agreement, the Court-approved Long-Form Notice (which includes details on how to exclude yourself or object), and other important documents are available at www.herbalifeactionsettlement.com. The U.S. District Court for the Central District of California, Western Division, is scheduled to hold a hearing on October 16, 2023, at 8:30 a.m., at First Street Courthouse, 350 W. 1st Street, Courtroom 10B, Los Angeles, CA 90012, to consider whether to approve the Settlement. Class Counsel will also request at the hearing, or at a later date, attorneys’ fees of up to 33 1/3% of the Settlement Fund of \$12,500,000, or \$4,166,667, plus reimbursement of costs and expenses, for investigating the facts, litigating the case, and negotiating the Settlement. You or your own lawyer may appear and speak at the hearing at your own expense, but you do not have to. The hearing may be conducted electronically or moved to a different date or time without additional notice, so it is a good idea to check www.herbalifeactionsettlement.com for updates. Please do not contact the Court about this Notice.

The Court has appointed the law firms of Mark Migdal & Hayden and Mortgage Recovery Law Group, LLP as Class Counsel to represent Settlement Class Members.

Herbalife Class Action Settlement
P.O. Box 173076
Milwaukee, WI 53217

If you'd like to unsubscribe [click here](#).

EXHIBIT C

From: help@mg.abdataclassactionmail.com on behalf of Herbalife Claims Administrator
<help@mg.abdataclassactionmail.com>
Sent:
To:
Subject: Test - Herbalife Settlement Notice - Reminder

EXTERNAL SENDER

Reminder: The deadline to file a Claim is August 4, 2023

Have you attended a U.S. Herbalife event? You could receive part of a \$12.5 Million Class Action Settlement.

Para obtener información en español, visite el sitio web
www.herbalifeactionsettlement.com/Home/espanol

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The Settlement provides for the payment of \$12,500,000 to resolve this case on behalf of Settlement Class Members. After deductions for attorneys' fees, litigation costs, and other administrative expenses ("Net Settlement Fund"), the Net Settlement Fund will be distributed to Class Members who submit valid claims. The Settlement also requires Herbalife to make certain changes to its corporate policies and procedures regarding U.S. Herbalife Events for no less than three years from the date the Court grants final approval of this Settlement.

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What are my rights?

If you are a Settlement Class Member, even if you do nothing, you will be bound by the Court's decisions and judgments concerning the Settlement. If you want to keep your right to sue Herbalife regarding U.S. Herbalife Events, you must exclude yourself from the Settlement Class in writing by August 4, 2023. If you choose to stay in the Settlement Class, you may object to the Settlement in writing by August 4, 2023. The Settlement Agreement, the Court-approved Long-Form Notice (which includes details on how to exclude yourself or object), and other important documents are available www.herbalifeactionsettlement.com. The U.S. District Court for the Central District of California, Western Division, is scheduled to hold a hearing on October 16, 2023, at 8:30 a.m., at First Street Courthouse, 350 W. 1st Street, Courtroom 10B, Los Angeles, CA 90012, to consider whether to approve the Settlement. Class Counsel will also request at the hearing, or at a later date, attorneys' fees of up to 33 1/3% of the Settlement Fund of \$12,500,000, or \$4,166,667, plus reimbursement of costs and expenses, for investigating the facts, litigating the case, and negotiating the Settlement. You or your own lawyer may appear and speak at the hearing at your own expense, but you do not have to. The hearing may be conducted electronically or moved to a different date or time without

additional notice, so it is a good idea to check www.herbalifeactionsettlement.com for updates. Please do not contact the Court about this Notice.

The Court has appointed the law firms of Mark Migdal & Hayden and Mortgage Recovery Law Group, LLP as Class Counsel to represent Settlement Class Members.

If you'd like to unsubscribe [click here](#).

EXHIBIT D

A.B. DATA, LTD.

Class Action Administration



June 6, 2022

via USPS Priority Mail

**Re: *Lavigne, et al., v. Herbalife Ltd., et al.*, Case No. 2:18-cv-07480-JAK (MRWx)(C.D. Cal.)
28 U.S.C. § 1715(b) Notification**

Dear Sir or Madam:

Claims Administrator A.B. Data, Ltd., on behalf of the Defendant Herbalife International of America, Inc. “Herbalife” in the above-referenced action (the “Action”), provides the notice as specified in the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b).

The Action is pending before Honorable John A. Kronstadt in the United States District Court for the Central District of California, Western Division. On May 27, 2022, Plaintiffs’ Counsel for the Settlement Class filed a Motion for Preliminary Approval of Class Action Settlement.

Please find enclosed a CD containing certain documents and information in “.pdf” format as required by the Class Action Fairness Act. These include the following enclosures:

1. The Complaint together with its exhibits, filed on September 18, 2017;
2. The Amended Complaint together with its exhibits, filed on November 12, 2019;
3. Plaintiffs’ Notice of Motion; Motion for Preliminary Approval of Class Action Settlement and Memorandum of Points and Authorities together with its exhibits, filed on May 27, 2022;
4. The Stipulation of Settlement, filed on May 27, 2022;
5. The proposed Long Form Notice, filed on May 27, 2022;
6. The proposed Short-Form Notice, filed on May 27, 2022; and
7. The proposed Claim Form, filed on May 27, 2022.

Herbalife believes that there are approximately 80,000 class members. Herbalife does not know and cannot currently determine the number of class members residing in each State, but Herbalife believes that the distribution of members in this nationwide class is generally proportional to the population distribution among the various states. Herbalife cannot quantify the proportionate share of the claims of class members in each State to the entire settlement but anticipates that the number of class members claiming a compensable loss under the settlement will be substantially smaller than the total membership of the class.

There are no contemporaneous agreements between Class Counsel and Defendants’ Counsel in conjunction with the proposed Settlement other than the enclosed Stipulation of Settlement. At this time, there has been no final judgment or notice of dismissal, and there are no written judicial opinions relating to the Stipulation of Settlement. A hearing on the motion for preliminary approval has been noticed for August 15, 2022 at 8:30 a.m.

The foregoing information is provided based upon what is currently available to date and the status of the proceedings at the time of the submission of this notice.

Sincerely,

A.B. Data, Ltd.

Claims Administrator on behalf of Defendants

EXHIBIT E

Exclusion ID	Name	State	Notes
255912724	Douglas Kwock	HI	
255912725	Karen Feiger	FL	Also filed a claim
255912726	Patricia McDonough	CA	

EXHIBIT F

Juez John A kronstadt

Caso: Lavigne , et al V. Herbalife, N* 2:218-cv-07480 -JAK (MRWx)

Flor Garcia Ochoa 10/02/1979 with a civil status of Single and a Mother. I include myself and I am an Active Member of this Lawsuit / Active Claim (07/26/2023) Online ;, # 259305501. At Herbalife International of America, Inc. Cc: Herbalife International , Inc (Mexico); Herbalife Nutrition Ltd. (Arizona) board.

I am writing this explanation and/or filing a formal, written objection before 10/16/2023. (I require copies of Objection - CA). Prior Objection sending it on 04/08/23 in writing (Certified Mail); a Central District Court of California Western Division, 350 W pt Street Courtroom 10B, Los Angeles CA 90012. · Cc: a Herbalife Class Action Settlement (2); P.O. Box 173076 Milwaukee, WI 53217; info@HerbalifeClassActionSettlement.com (online).

*****Due to the fact that my rights have NOT been respected, perks within the President of Cima club since 1993 with Herbalife International Inc.*****

1. I ask for all that corresponds to me in equivalent money in American currency. dollar; Due to my investment in Pesos MX made in 1993, I was never reimbursed any capital gains until 11/22/2022 with the last purchase on 03/2022. Membership: 090234515. From Cima – President Team. 6 million Mexican pesos.
2. Regardless of the only classes attended (videos- and interruptions too) ; Herbalife; inside location 8841 N 19th Ave Suite 2 Phoenix AZ 85021. I include Current Form of Herbalife International of America, Inc. I demand my Refund together with all the earnings filed since 1993 and transferred to Josefina Jaime together with the Executive Team before Elite. In direct deposit in bank account. Under my name Flor Garcia Ochoa (US Bank or Bank of America). 2009-2011. Two tickets bounced from personal bank account; Las Vegas NV. and I couldn't attend. The paper check sent for \$500 dis. (2011). To Flor Garcia; 2020 W Glendale Ave #2066 /#1034 Phoenix AZ 85021. (This is a drastically wrong amount). Zeros are missing from the paper check.
3. I have never moved from my membership, nor have I changed to a Preferred Associate since 2011. Only refund has been a paper check, too. From \$558 approx (2018) To Flor Garcia / Flor Garcia Ochoa at 5611 W Northview Glendale AZ 85301. (This is a drastically wrong amount.) Zeros are missing from the check.
4. During 2011, the majority of Herbalife International, Inc. distributors have switched to Individual or Preferred Members. Flor Garcia 090234515 I stayed the same. Between 2011 to 2021. It was very difficult for me; Buy again and invest because there were 11 or 12 accounts with Herbalife International, Inc.; Online and my name kept being Manipulated with tickets already purchased a year in advance to Massive Extravaganza V Events, they never sent me a voucher to attend my extravaganzas. (2011/ 2021- COVID19-2022).
5. Nor have I been excluded from my rights and royalties, of which I have not sold or Gifted (awarded); to any direct relative or relatives; legally royalties and rights since 1993

and/or before 04/08/2023. Continuing to 10/16/2023. Miguel Angel Garcia (Ibarra) (Father?); Rosario Ochoa Camacho (Mother- RIP); Miguel Angel Garcia Ochoa (brother?); Sweet Maria Garcia Ochoa (Sister?). If so, there will be a counterclaim against those responsible. From any illegal document under my name Flor Elizabeth Garcia Ochoa; from 01/07/2020 to 11/30/2021 and continuing until 10/16/2023 in Law and Judgement exclusively. I also require the legal documents be sent in a certified envelope. And signature of receipt of all Mexican rights and royalties filed in Flor Garcia Ochoa 10/02/1979 with private address Mazatlan Sinaloa MX; since 1993. Because there was always manipulation and strong intimidation from 1993 - 2018; Mazatlan Sin. mx. Being the same victim 2018-2021 with serious poisoning. Some people involved. In other words, legally I require any explanation since 1993.

No transfer has been made to anyone either. In this Case for protection and legal extension, the only heirs would be my children only. Of which I legally include in Court 10/16/2023. Here the only and first victim has been me: Flor E Garcia Ochoa. At the moment I do not have a Legal Advocate, but I would like to appear and report in court (in person or virtual) to testify everything I have written.

Sincerely,

Flor Garcia Ochoa

08/04/2023

Juez John A kronstadt

Caso: Lavigne , et al V. Herbalife, N* 2:218-cv-07480 -JAK (MRWx).

AUG 08 2023

Flor Garcia Ochoa 02/10/1979 con status civil Soltera y Madre. Me incluyo y soy Miembro Activa de esta Demanda / Reclamacion activa (07/26/2023) Online ;, # 259305501. En Herbalife International de America , Inc. Cc : Herbalife International , Inc (Mexico); junto Herbalife Nutrition Ltd. (Arizona).

Escribo esta explicacion y/o interponer una objection formal y escrita antes del 10/16/2023. (requiero copias de Objection - CA). Previa Objection enviandola en 08/04/2023 por escrito (Certified Mail); a Tribunal Distrito Central de California Division Oeste , 350 W 1st Street Courtroom 10B, Los Angeles CA 90012. Cc: a Herbalife Class Action Settlement (2); P.O. Box 173076 Milwaukee, WI 53217; info@HerbalifeClassActionSettlement.com (online).

**** Debido a que NO se han respetado mis derechos, Regalias dentro de equipo de Presidente De Cima desde 1993. Con Herbalife International Inc. *****

1: Pido todo lo que me corresponde en dinero equivalente en moneda americana dollar; debido a mi inversion interpuesta en Pesos MX hecha en 1993 nunca se me reembolso ninguna plusvalia hasta 11/22/2022 con ultima compra en 03/2022. Misma Membresia : 090234515. De Cima – President Team. 6 Millones de Pesos MX.

2: Independientemente de las unicas clases asistidas (videos- e interruptions too) ; Herbalife ; dentro de ubicacion 8841 N 19th Ave Suite 2 Phoenix AZ 85021. Incluyo Forma Actual de Herbalife International de America, Inc. Exijo mi Reembolso en regalias junto a todas las ganancias interpuestas desde 1993 y traspasadas a Josefina Jaime junto Equipo Ejecutivo antes Elite. En deposito directo en cuenta bancaria. Bajo mi Nombre Flor Garcia ochoa. (US Bank or Bank of America). 2009-2011. Dos boletos se rebotaron en cuenta bancaria personal; Las Vegas NV . y no pude asistir

El cheque enviado en papel de \$ 500 dls. (2011). A Flor Garcia; 2020 W Glendale Ave #2066 /#1034 Phoenix AZ 85021. (Es una cantidad drasticamente erronea).

Le faltan Zeros al cheque de papel.

3: Nunca me movi de mi membresia , ni tampoco me cambie a Asociado preferente desde 2011. Unico reembolso ha sido cheque de papel Tambien. De \$ 558 aprox.

(2018); A Flor Garcia / Flor Garcia Ochoa en 5611 W Northview Glendale AZ 85301.

(Es una cantidad drasticamente erronea). Le faltan Zeros al cheque.

4: Durante 2011 ; la mayoria de los distribuidores de Herbalife International, Inc se cambiaron a ser Individuales o Asociados Preferentes. Flor Garcia 090234515 me mantuve igual. Entre 2011 a 2021. Fue muy dificil para Mi; Volver a comprar e invertir debido a que existian 11 o 12 cuentas con Herbalife Internacional , Inc ; Online y mi nombre seguia siendo Manipulado. Con boletos ya comprados desde un ano de anticipacion a Eventos masivos de Extravaganza Y yo en ninguna vez me mandaron algun bono para acudir a mis extravaganzas. (2011/ 2021-COVID19-2022).

5: Tampoco he sido excluida de mis derechos y regalias , de los cuales ; no he vendido o Regalado (otorgado); a ningun familiar directo or relatives; legalmente regalias y derechos desde 1993 y/o antes del 08/04/2023.Continuando a 10/16/2023. Miguel Angel Garcia (Ibarra) (Padre ?); Rosario Ochoa Camacho (Madre- RIP); Miguel Angel Garcia Ochoa (brother ?); Dulce Maria Garcia Ochoa (Sister ?). De ser asi existira contrademanda a los responsables. De algun documento ilicito bajo mi ; \nombre Flor Elizabeth Garcia Ochoa; desde 07/01/2020 a 11/30/2021 y continuacion hasta 10/16/2023. En Ley y Juez exclusivamente.

Requiero Tambien los documentos legales enviados en sobre certificado. Y firma de recibido de todos los derechos y regalias mexicanas interpuestos en Flor Garcia Ochoa 02/10/1979 con domicilio particular Mazatlan Sinaloa MX; desde 1993. Debido a que siempre hubo manipulacion y Fuertes intimidaciones hasta golpes; desde 1993 – 2018; Mazatlan Sin. MX . Siendo yo la misma victima 2018 – 2021 con serias intoxicaciones. Algunas Personas involucradas. Es decir legalmente requiero toda explicacion desde 1993. Ningun traspaso se ha realizado tampoco a nadie. En este Caso para proteccion y ampliacion legal, los unicos herederos serian Mis Hijos

Selectos Unicamente. De los Cuales incluyo legalmente en Corte 10/16/2023. Aqui la unica victima y primera he sido Yo ; Flor E Garcia Ochoa. Por el momento no cuento con Abogado Legal , pero me gustaria comparecer e Informar en Corte (Persona- virtual); todo lo escrito.

Sinceramente

Flor Garcia Ochoa

THANK YOU FOR SUBMITTING YOUR CLAIM FOR THE

HerbalLife Settlement

**To Print this Page for Your Records: Right Click
Anywhere on the Page, and Select Print**

Your claim number is **259407183**,
submitted on **Friday August 04, 2023**.

The Settlement Administrator will review your claim and determine if it is valid for payment from the Settlement. Relief from the Settlement will be made only if the Court approves the Settlement and only after any appeals are resolved. Please be patient.

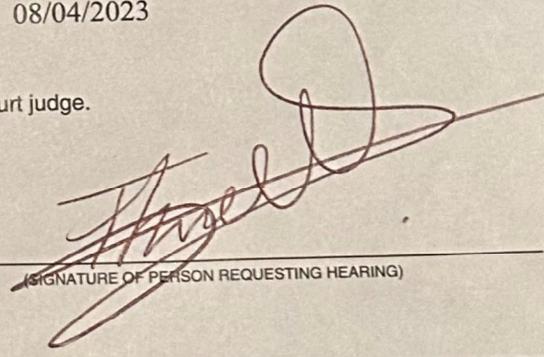
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Flor Garcia or Flor E Garcia Ochoa 5611 W Northview Ave Glendale Az 85301 TELEPHONE NO.: (602)575 - 8311 FAX NO.: N/A ATTORNEY FOR (Name): N/A		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 350 W 1st Street Courtroom 10B MAILING ADDRESS: N/A CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME:		
PLAINTIFF/PETITIONER: MICHAEL LAVIGNE, et al DEFENDANT/RESPONDENT: Herbalife International de America.		
OTHER PARENT: with Herbalife NOTICE OF OBJECTION		
		CASE NUMBER: 2: 18-cv-07480-JAK (MRWx)

1. I object to the Findings and Recommendation of Commissioner made on (date): 08/04/2023 by Commissioner (name):

2. I request that the matter be set for a *de novo* (new) hearing before a superior court judge.

Date: 08/04/2023

Flor Garcia Ochoa
(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON REQUESTING HEARING)

NOTICE

You must file this notice with the clerk of the court where the Findings and Recommendation of Commissioner was made within 10 court days of the date the recommended order was made.

EXHIBIT G

A.B. DATA, LTD.

Class Action Administration
 600 A. B. Data Drive
 Milwaukee, WI 53217
 414-961-7523
 accounting@abdataclassaction.com
 abdataclassaction.com



MARK MIGDAL & HAYDEN
 80 SW 8th Street, Suite 1999
 MIAMI, FL, 33130
 USA

INVOICE INV000304779
PAGE 1/1
DATE 4/30/2023
CLIENT 392391

INVOICE

JOB 54576 Herbalife Settlement

DESCRIPTION	QTY	PRICE	AMOUNT
Project/Database Setup (One-Time Fee)	1	4,500.00	\$4,500.00
Website Setup and Design (One-Time Fee)	1	3,000.00	\$3,000.00
Toll-Free Telephone Line Setup (One-Time Fee)	1	1,000.00	\$1,000.00
Claim Processing, Validation and Audits (Hourly)	0.50	55.00	\$27.50
Executive Project Management	15.00	225.00	\$3,375.00
Project Management (Hourly)	18.75	175.00	\$3,281.25
System Support (Hourly)	39.75	185.00	\$7,353.75
Quality Assurance (Hourly)	2.25	160.00	\$360.00
Staff (Hourly)	9.75	105.00	\$1,023.75
Postage	1	180.29	\$180.29
Website Maintenance/Hosting (Monthly)	1	275.00	\$275.00
Interactive Voice Response (IVR) (Per Minute)	9	0.48	\$4.32
CSRs/Live Operators (Per Hour)	1.75	55.00	\$96.25
800 Number Charges (Per Minute)	4	0.14	\$0.56
IVR and Line Maintenance (Monthly)	1	195.00	\$195.00
Transperfect Translations	1	1,217.56	\$1,217.56

TOTAL \$25,890.23

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
 Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
 400 W. Brown Deer Road, Bayside, WI 53217
 Routing Number 075000022
 Account Number 182377466541 (AB Data, Ltd.)
 Swift Code USBKUS44IMT

A.B. DATA, LTD.

Class Action Administration

600 A. B. Data Drive
 Milwaukee, WI 53217
 414-961-7523
 accounting@abdataclassaction.com
 abdataclassaction.com



MARK MIGDAL & HAYDEN
 80 SW 8th Street, Suite 1999
 MIAMI, FL, 33130
 USA

INVOICE INV000304865
PAGE 1/1
DATE 5/31/2023
CLIENT 392391

INVOICE

JOB 54576 Herbalife Settlement

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Preparation of Paper Claim Forms	2	2.50	\$5.00
Claim Processing, Validation and Audits (Hourly)	1.00	55.00	\$55.00
Project Management (Hourly)	51.50	175.00	\$9,012.50
System Support (Hourly)	76.00	185.00	\$14,060.00
Staff (Hourly)	44.00	105.00	\$4,620.00
Prepare and Send Emails	2,374,852	0.0020	\$4,749.70
Printing and Mailing of Notice Postcards	463,187	0.1642	\$76,055.31
Postage	1	180,684.03	\$180,684.03
Website Maintenance/Hosting (Monthly)	1	275.00	\$275.00
Interactive Voice Response (IVR) (Per Minute)	123	0.48	\$59.04
CSRs/Live Operators (Hourly)	12.25	55.00	\$673.75
800 Number Charges (Per Minute)	121	0.14	\$16.94
IVR and Line Maintenance (Monthly)	1	195.00	\$195.00
Document Imaging	8	0.20	\$1.60
Post Office Box Rental/Renewal	1	1,480.00	\$1,480.00
Electronic Storage	1	114.09	\$114.09

TOTAL \$292,056.96

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
 Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
 400 W. Brown Deer Road, Bayside, WI 53217
 Routing Number 075000022
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MARK MIGDAL & HAYDEN
 80 SW 8th Street, Suite 1999
 MIAMI, FL, 33130
 USA

INVOICE INV000305076
PAGE 1/1
DATE 6/30/2023
CLIENT 392391

INVOICE

JOB 54576 Herbalife Settlement

DESCRIPTION	QTY	PRICE	AMOUNT
Remailing of Notice Packets to Updated Addresses	41	0.95	\$38.95
Upload and Import of Online Claim Forms	6,702	0.20	\$1,340.40
Claim Processing, Validation and Audits (Hourly)	2.00	55.00	\$110.00
Project Management (Hourly)	32.50	175.00	\$5,687.50
System Support (Hourly)	24.50	185.00	\$4,532.50
Staff (Hourly)	20.75	105.00	\$2,178.75
Printing and Mailing of Notice Postcards	675,198	0.1642	\$110,867.51
Postage	1	257,987.58	\$257,987.58
Website Maintenance/Hosting (Monthly)	1	275.00	\$275.00
Interactive Voice Response (IVR) (Per Minute)	421	0.48	\$202.08
CSRs/Live Operators (Hourly)	35.75	55.00	\$1,966.25
800 Number Charges (Per Minute)	1,189	0.14	\$166.46
IVR and Line Maintenance (Monthly)	1	195.00	\$195.00
Document Imaging	24	0.20	\$4.80
Electronic Storage	1	76.96	\$76.96

TOTAL \$385,629.74

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
 Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
 400 W. Brown Deer Road, Bayside, WI 53217
 Routing Number 075000022
 Account Number 182377466541 (AB Data, Ltd.)
 Swift Code USBKUS44IMT

A.B. DATA, LTD.

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 600 A. B. Data Drive
 Milwaukee, WI 53217
 414-961-7523
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 abdataclassaction.com



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 80 SW 8th Street, Suite 1999
 MIAMI, FL, 33130
 USA

INVOICE INV000305223
PAGE 1/1
DATE 7/30/2023
CLIENT 392391

INVOICE

JOB 54576 Herbalife Settlement

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Preparation of Paper Claim Forms	24	2.50	\$60.00
Upload and Import of Online Claim Forms	42,019	0.20	\$8,403.80
Claim Processing, Validation and Audits (Hourly)	0.50	55.00	\$27.50
Project Management (Hourly)	28.00	175.00	\$4,900.00
System Support (Hourly)	36.25	185.00	\$6,706.25
Quality Assurance (Hourly)	1.00	160.00	\$160.00
Staff (Hourly)	51.50	105.00	\$5,407.50
Postage	1	10,782.72	\$10,782.72
Website Maintenance/Hosting (Monthly)	1	275.00	\$275.00
Interactive Voice Response (IVR) (Per Minute)	721	0.48	\$346.08
CSRs/Live Operators (Hourly)	28.25	55.00	\$1,553.75
800 Number Charges (Per Minute)	2,473	0.14	\$346.22
IVR and Line Maintenance (Monthly)	1	195.00	\$195.00
Advanced Address Updates	161,291	0.15	\$24,193.65
Document Imaging	269	0.20	\$53.80
Electronic Storage	1	80.07	\$80.07

TOTAL \$63,491.34

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
 Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
 400 W. Brown Deer Road, Bayside, WI 53217
 Routing Number 075000022
 Account Number 182377466541 (AB Data, Ltd.)
 Swift Code USBKUS44IMT

A.B. DATA, LTD.

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 abdataclassaction.com



MARK MIGDAL & HAYDEN
 80 SW 8th Street, Suite 1999
 MIAMI, FL, 33130
 USA

INVOICE INV000305345
PAGE 1/1
DATE 8/31/2023
CLIENT 392391

INVOICE

JOB 54576 Herbalife Settlement

DESCRIPTION	QTY	PRICE	AMOUNT
Remailing of Notice Packets to Updated Addresses	26,559	0.95	\$25,231.05
Receipt and Preparation of Paper Claim Forms	134	2.50	\$335.00
Upload and Import of Online Claim Forms	115,901	0.20	\$23,180.20
Claim Processing, Validation and Audits (Hourly)	25.25	55.00	\$1,388.75
Executive Project Management (Hourly)	5.75	225.00	\$1,293.75
Project Management (Hourly)	47.25	175.00	\$8,268.75
System Support (Hourly)	20.50	185.00	\$3,792.50
Staff (Hourly)	29.50	105.00	\$3,097.50
Prepare and Send Emails	11,586	0.0020	\$23.17
Website Maintenance/Hosting (Monthly)	1	275.00	\$275.00
Interactive Voice Response (IVR) (Per Minute)	729	0.48	\$349.92
CSRs/Live Operators (Hourly)	41.50	55.00	\$2,282.50
800 Number Charges (Per Minute)	2,483	0.14	\$347.62
IVR and Line Maintenance (Monthly)	1	195.00	\$195.00
Advanced Address Updates	20,016	0.15	\$3,002.40
Document Imaging	224	0.20	\$44.80
Electronic Storage	1	93.63	\$93.63

TOTAL \$73,201.54

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
 Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

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 Routing Number 075000022
 Account Number 182377466541 (AB Data, Ltd.)
 Swift Code USBKUS44IMT