

**GUTRIDE SAFIER LLP**

ADAM J. GUTRIDE (State Bar No. 181446)  
SETH A. SAFIER (State Bar No. 197427)  
KRISTEN G. SIMPLICIO (State Bar No. 263291)  
100 Pine Street, Suite 1250  
San Francisco, California 94111  
Telephone: (415) 639-9090  
Facsimile: (415) 449-6469

**TYCKO & ZAVAREEI LLP**

HASSAN A. ZAVAREEI (State Bar No. 181547)  
JEFFREY D. KALIEL (State Bar No. 238293)  
ANDREW J. SILVER (*pro hac vice*)  
1828 L Street, N.W., Suite 1000  
Washington, DC 20036  
Telephone: (202) 973-0900  
Facsimile: (202) 973-0950

*Counsel for Plaintiff and the Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

ROHINI KUMAR, an individual, on behalf  
of herself, the general public and those  
similarly situated,

Plaintiff,

v.

SALOV NORTH AMERICA CORP.,

Defendant.

CASE NO. 4:14-cv-02411-YGR

**SUPPLEMENTAL DECLARATION OF  
JEANNE C. FINEGAN, APR**

Date: May 30, 2017

Time: 2:00 p.m.

Courtroom 1, Fourth Floor

Hon. Judge Yvonne Gonzalez Rogers

I, JEANNE C. FINEGAN declare as follows:

**INTRODUCTION**

1. I am President and Chief Media Officer of HF Media, LLC, a division of Heffler Claims Group which specializes in the design and implementation of court approved legal notice plans. This Declaration is based upon my personal knowledge as well as information provided to me by my associates and staff, including information reasonably relied upon in the fields of advertising media and communications.



1 all Filippo Berio users and 76 percent of Filippo Berio principal shoppers.

2 4. The summary publication notice was published in *Good Housekeeping* and *People*,  
3 both of which index very well against principal shoppers of Filippo Berio. According to GfK  
4 Mediamark Research and Intelligence, LLC (“MRI”) users of Filippo Berio are 53 percent more  
5 likely to read *Good Housekeeping* and 48 percent more likely to read *People* than the average  
6 adult.

7 5. Internet banner ads were targeted to purchasers of Filippo Berio and more generally  
8 to olive oil purchasers using consumer shopper data, as well as targeted demographically to those  
9 most likely to be purchasers of Filippo Berio (Adults 45+).

10 6. As an additional reminder, Facebook banner ads were retargeted, meaning served  
11 again to people who clicked, liked, commented, shared, liked a comment, or @tagged the ads.  
12 Retargeting is a powerful conversion optimization tool because it focuses ads on users who have  
13 already demonstrated an interest. It is designed to reach users who don’t take action right away  
14 with additional opportunities (reminders) to participate throughout the campaign.

15 7. At the request of Class Counsel, Heffler also issued a second press release. .

16 8. In addition to administering settlements like this one, Heffler has administered  
17 claims processes that occur after trial/judgment. Had this case progressed to trial, and a judgment  
18 been entered for the class, the process of identifying and notifying class members would have been  
19 the same (*i.e.* publication).

#### 20 **WEB SITE TRAFFIC AND TELEPHONE INFORMATION LINE**

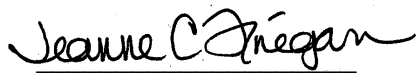
21 9. As of May 15, 2017 there have been 259,554 users to the web site visiting it on  
22 295,109 sessions.

23 10. As of May 15, 2017 284 people have called the toll-free information Interactive  
24 Voice Response (“IVR”) line. For those who did not have access to the settlement website, an  
25 option was provided to leave a message and request that a claim form be mailed to them. As of  
26 May 12, 2017, 101 callers left messages and requested that a claim form be mailed to them.

27 11. Additionally, Heffler received letters and email from class members concerning the  
28 settlement such as, the type of proof required to file a claim, claim deadlines and when  
distributions would be made along with general correspondence. I have confirmed with the claims

1 and correspondence team that no inquiries were received regarding the phrase “If the Products had  
2 not included the phrase ‘Imported from Italy’ on the label, I would not have made the purchase(s)  
3 or paid the price(s) charged.”

4 12. I declare under the penalty of perjury under the laws of the United States of  
5 America that the foregoing is true and correct. Executed on May 16, 2017, in Tigard, Oregon.

6  
7 

8 Jeanne C. Finegan, APR

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28