

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Jane Doe and John Does 1 and 2, on behalf of
themselves and all others similarly situated,

Plaintiffs,

-against-

MasterCorp, Inc.,

Defendant.

INDEX NO. 1:24-cv-678

**DECLARATION OF GINA INTREPIDO-BOWDEN
RE: RESULTS OF THE CLAIMS PERIOD**

I, GINA INTREPIDO-BOWDEN, declare and state as follows:

1. I am a Vice President at JND Legal Administration LLC (“JND”). This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees and, if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Settlement Administrator in the above-captioned litigation for the purposes of administering the Settlement Agreement filed May 13, 2024 (Docs. 4-6) and amended May 13, 2024 (Doc. 13) (“Settlement Agreement”). The Settlement Agreement was preliminarily approved by this Court in its *Order Granting Preliminary Approval of the Class and Collective Action Settlement and Directing Notice Under Fed. R. Civ. P. 23(e) and 29 U.S.C. § 216(b)* filed May 16, 2024 (Doc. 15). On July 24, 2024, this Court filed an *Order Granting Consent Motion for 30-Day Enlargement of Class Notice Period and Corresponding Extension of Remaining Case Deadlines* (Doc. 18) and on August 22, 2024, an *Order Granting Consent Motion for Second Enlargement of Class Notice Period and Corresponding Extension of Remaining Case Deadlines* (Doc. 21).

3. I previously submitted the *Declaration of Gina Intrepido-Bowden re: Settlement Notice Program* (“Intrepido-Bowden Decl.”) that was filed April 25, 2024, with the Settlement Agreement. I also previously submitted the *Declaration of Gina Intrepido-Bowden re: Settlement Notice Program Implementation* (“Second Intrepido-Bowden Decl.”) that was filed October 17, 2024.

4. This Declaration is being filed to notify the Court regarding the results of the claims period.

SETTLEMENT WEBSITE

5. As described in the Second Intrepido-Bowden Decl., on June 3, 2024, JND established an informational case-specific Settlement Website, <https://www.ColombianHousekeeperSettlement.com>. The Settlement Website is available in both English and Spanish, and it includes information on how potential Settlement Class and Collective Members can opt out or object to the Settlement, if they choose, or file a claim for compensation.

6. As of November 6, 2024, the Settlement Website registered a total of 52,425 page views and 19,683 unique visitors. JND will continue to maintain the Settlement Website throughout the administration process.

TOLL-FREE NUMBER, P.O. BOX, AND EMAIL ADDRESS

7. As described in the Second Intrepido-Bowden Decl., on June 3, 2024, JND established a Settlement-specific toll-free number in the U.S (888-825-1238) and Colombia (01-800-519-1529) for potential Settlement Class and Collective Members to call for additional information. The automated script is available in both English and Spanish. There is also an option to speak with an English- or Spanish-speaking live operator during business hours.

8. As of November 6, 2024, JND has received 130 calls to the toll-free number. JND will continue to maintain the toll-free number throughout the administration process.

9. As described in the Second Intrepido-Bowden Decl., on June 3, 2024, JND established a dedicated email address, info@ColombianHousekeeperSettlement.com, that allows

Settlement Class and Collective Members to submit email inquiries to JND. Emails are monitored by JND personnel who are trained to answer questions about the Settlement.

10. As of November 6, 2024, JND has handled 15 incoming email communications. JND will continue to maintain the email inbox throughout the administration process.

OBJECTIONS AND REQUESTS FOR EXCLUSION

11. The notice documents inform recipients that any Settlement Class and Collective Member who wants to object or exclude themselves from the proposed Settlement can do so by November 1, 2024. As of November 6, 2024, JND has not received and is not aware of any objections or requests for exclusion.

CLAIMS

12. The notice documents informed recipients that any Settlement Class and Collective Member who wants to file a claim in the proposed Settlement must do so by November 1, 2024. Although the filing deadline has passed, timely postmarked claims may be received over the next two to three weeks.

13. As of November 6, 2024, JND has received 331 claims, of which 49 have been determined as valid based on a match back to the Class Data provided by Defendants and/or review of the documentation provided with the claims. In consultation with Class Counsel, JND will complete claim review and make preliminary determinations.

14. JND will send a letter to all claimants whose claims are not deemed valid to advise them of the determination and provide an opportunity to submit additional documentation to support their claim. Responses must be postmarked or emailed within ten days, or they will not be considered. A representative copy of the letter in English is attached as **Exhibit A**. It will be translated and sent to claimants in Spanish.

15. JND will report to Class Counsel any additional timely claims that are received as well as any additional claims that are validated through responses to the determination letters.

I declare under the penalty of perjury pursuant to the laws of the United States of America and the State of New Jersey that the foregoing is true and correct.

Executed on November 8, 2024, at Stone Harbor, New Jersey

A handwritten signature in black ink, appearing to read "Gina Intrepido-Bowden". The signature is written in a cursive, flowing style.

GINA INTREPIDO-BOWDEN

Colombian Housekeeper Settlement
c/o JND Legal Administration
PO Box 91308
Seattle WA 98111

«PrintedID»

«QR»«Fullname»
«AddressLine1»
«AddressLine2»
«AddressLine3»
«AddressCity», «AddressState» «AddressPostalCode»
«AddressCountry»

Claim Determination - Rejected

November XX, 2024

Dear «Fullname»:

Your claim for the *Colombian Housekeeper Settlement* was reviewed and rejected. Based on the information provided, we are unable to match your claim to the original Class Member Data. If you disagree with this determination, you must provide the information described below:

- Proof that supports your employment during the Class Period.

The Settlement Class includes all workers who are Colombian Nationals or of Colombian origin who were paid by Perennial Pete, LLC or one of its affiliated entities or companies, and who provided housekeeping services at resorts in the United States where MasterCorp was responsible for housekeeping services between March 19, 2021 and May 15, 2024.

Your response must be postmarked **no later than [date 10 days after letter issued]** and mailed to the address printed at the top of this letter. Failure to timely provide the required information will result in the denial of your claim without further notification.

If you have questions about this letter, please email the Settlement Administrator at info@ColombianHousekeeperSettlement.com, call 888-825-1238 (from U.S.) or call 01-800-519-1529 (from Colombia). For up-to-date information related to the Settlement, please visit www.ColombianHousekeeperSettlement.com.

Regards,

Colombian Housekeeper Settlement Administrator