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23 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
24 **COUNTY OF SAN FRANCISCO**

25 ERIC GRUBER; EVER GONZALEZ; and
26 JEREMY EARLS, individually and on behalf
27 and all others similarly situated,

28 Plaintiffs,

29 v.

30 YELP, INC., and DOES 1-10, inclusive,

31 Defendants.

32 Case No. CGC 16-554784

33 **CLASS ACTION**

34 **SUPPLEMENTAL DECLARATION OF**
35 **JEANNE M. CHERNILA REGARDING**
36 **CLASS NOTICE AND SETTLEMENT**
37 **ADMINISTRATION**

38 Date: April 10, 2024

Time: 9:30 AM

Dept.: 613

Action Filed: October 12, 2016

Assigned to the Hon. Andrew Y.S. Cheng

ELECTRONICALLY

FILED

Superior Court of California,
County of San Francisco

04/02/2024

Clerk of the Court

BY: VERA MU

Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

DEPARTMENT 613

ERIC GRUBER; CHERYL SKIDMORE;
EVER GONZALEZ; and JEREMY EARLS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

YELP, INC., and DOES 1-10, inclusive,

Defendants.

Case No.: CGC 16-554784

SUPPLEMENTAL DECLARATION OF
JEANNE M. CHERNILA REGARDING
CLASS NOTICE AND SETTLEMENT
ADMINISTRATION

Action Filed: October 12, 2016

Assigned for All Purposes to the Hon. Andrew
Y.S. Cheng

**SUPPLEMENTAL DECLARATION OF JEANNE M. CHERNILA REGARDING
CLASS NOTICE AND SETTLEMENT ADMINISTRATION**

I, Jeanne M. Chernila, hereby declare and state as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). I have served as a Project Manager for Epiq since 2022 and prior to that I was an Associate Project Manager for another class action administrator for nine years. In both of these positions I have overseen the detailed administration of numerous class action programs during that time. The statements of fact in this declaration are based on my personal knowledge and information provided to me by my colleagues in the ordinary course of business, and if called on to do so, I could and would testify competently thereto.

2. I am submitting this supplemental declaration to update my earlier declaration (*Declaration of Jeanne M. Chernila Regarding Implementation of Notice and Settlement Administration*, filed on March 14, 2024) and to provide updated claim and administration information.

1 **SETTLEMENT WEBSITE**

2 3. As of March 28, 2024, the Website has been visited by 2,8922 unique visitors and
3 7,977 website pages have been viewed. A total of 1,613 Class Members have confirmed or updated
4 their contact information through the registration portal of the website.

5
6 **TOLL-FREE INFORMATION LINE**

7 4. As of March 28, 2024, the toll-free number has received 976 calls representing
8 2,116 total minutes.

9
10 **EMAIL INBOX**

11 5. As of March 28, 2024, Epiq has received and responded to a total of sixty (60)
12 incoming emails.

13
14 **REQUESTS FOR EXCLUSION**

15 6. Pursuant to Paragraph 7 of the Order, Class Members who wished to be excluded
16 from the Settlement were required to submit a written Requests for Exclusion to Epiq postmarked
17 or received on or before March 28, 2024. As of March 28, 2024, Epiq has received sixteen (16)
18 timely and potentially valid exclusion requests. Since the requirement for submission of a written
19 Request for Exclusion is a postmark date, it is possible Epiq will receive additional timely and
20 potentially valid exclusion requests for an additional 10-14 days. A report listing the sixteen (16)
21 known timely requests received to date is attached hereto as **Exhibit 1**.

22
23 **OBJECTIONS RECEIVED**

24 7. Pursuant to Paragraph 7 or the Order, Class Members who wished to object to the
25 Settlement were required to submit written objections to the Clerk of the Court, Counsel for the
26 Defendant, Class Counsel, and Epiq, such that they were postmarked and received on or before
27 the objection deadline of March 28, 2024. As of March 28, 2024, Epiq is aware of or has received
28

1 one (1) timely written objection to the Settlement. This one (1) objection was previously reported
2 to the Court. Since the requirement for submission of an Objection is a postmark date, it is possible
3 Epiq will receive additional timely and potentially valid written objections in the next 10-14 days.
4

5 **DISPUTES RECEIVED**

6 8. Pursuant to Paragraph 7 of the Order, Class Members who wished to Dispute the
7 number of phone calls received from Yelp during the Class Period were required to submit a
8 written request to Epiq postmarked or received electronically on or before March 28, 2024. As of
9 March 28, 2024, Epiq has received two (2) Disputes. Of these two (2) Disputes, Epiq has
10 determined one (1) meets requirements and is a valid submission.
11

12 **ADMINISTRATION**

13 9. Epiq anticipates that fees and expenses for notice and settlement administration will
14 not exceed \$600,000.00.
15
16

17 I declare under penalty of perjury under the laws of the United States and the State of
18 California that the foregoing is true and correct and that this declaration was executed on March
19 29, 2024, in Rio Nido, California
20

21 *Jeanne M. Chernila*

22 _____
23 Jeanne M. Chernila
24 Project Manager
25 Epiq Class Action & Claims Solutions, Inc. (“Epiq”)
26
27
28

Exhibit 1



Count: 16

Gruber v Yelp Inc.

Case No. CGC-16-554784

Identifying Number	Last Name	First Name	Middle	State	Submission Date
410749	GLENNON	ROBERT		CA	2/16/2024
62721	PORTER	KRISTINA	M	CA	2/16/2024
370146	WILLIAMS	KEVIN		CA	2/16/2024
160793	HOLVERSTOTT	NAJEE	R	TX	2/17/2024
300003	ANDRINGA	THOMAS		CA	2/19/2024
397226	THOMAS	OBRION	M	CA	2/20/2024
271698	GEIGER	ETHEL	C	CA	2/21/2024
52635	MOGA	KYLE		AZ	2/22/2024
13469	ANDERSON	JULIE		CA	2/26/2024
35692	CALVERT	BRIANNA		VA	2/27/2024
123451	BARROS	JOSE	A	CA	3/9/2024
280382	BARROS	ZANDY		CA	3/9/2024
382211	LIDGI	AVI		WA	3/14/2024
213740	QUINN	PATRICK	J	CO	3/22/2023
383867	BENEFIELD	NORMAN	P	CA	3/25/2024
60785	VALDEZ	ESTEBAN	A	MI	3/24/2024

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

3 I am employed in the County of Sacramento, State of California. I am over the age of 18 years and
4 not a party to this action. My business address is 850 Iron Point Road, Suite 211
5 Folsom, CA 95630 and E-mail: Mfisher@mdmflaw.com. On April 2, 2024, I served the foregoing
6 document(s) described as **SUPPLEMENTAL DECLARATION OF JEANNE M. CHERNILA
REGARDING CLASS NOTICE AND SETTLEMENT ADMINISTRATION** on the interested
parties in this action:

7 **SEE ATTACHED SERVICE LIST**

8 **BY U.S. POSTAL SERVICE:** This document was served by United States mail. I
9 enclosed the document in a sealed envelope or package addressed to the person(s) at the
10 address(es) above and placed the envelope(s) for collection and mailing, following our
11 ordinary business practices. I am readily familiar with this firm’s practice of collecting and
processing correspondence for mailing. On the same day that correspondence is placed for
collection and mailing, it is deposited in the ordinary course of business with the United
States Postal Service at Sunnyvale, California, in a sealed envelope with postage fully paid.

12 **BY OVERNIGHT DELIVERY:** The document(s) were served by overnight
13 delivery via FedEx. I enclosed the document in a sealed envelope or package addressed to
14 the person(s) and the address(es) above and placed the envelope(s) for pick-up by FedEx. I
am readily familiar with the firm’s practice of collection and processing correspondence on
the same day with this courier service, for overnight delivery.

15 **BY ELECTRONIC SERVICE VIA FILE & SERVE XPRESS:** I caused the
16 document(s) to be served through the Court’s approved vendor, File & Serve Xpress, at
17 <https://secure.fileandservexpress.com>, addressed to all parties maintained on the Court’s
service list for the above entitled case. The service transmission was completed, and a copy of
the confirmation page will be maintained with the original document in this office.

18 **BY HAND DELIVERY:** The document(s) were delivered by hand during the
19 normal course of business, during regular business hours.

20 (State) I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

21 (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at
22 whose direction the service was made. I declare under penalty of perjury under the laws of the
United States of America that the foregoing is true and correct.

23 Executed on April 2, 2024, at Folsom, California.

24 

25 _____
Matthew H. Fisher

SERVICE LIST

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