

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 0:17-cv-62100-FAM

KATIRIA RAMOS,
individually and on behalf of all
others similarly situated,

Plaintiff,

CLASS ACTION

JURY TRIAL DEMANDED

v.

HOPELE OF FORT LAUDERDALE, LLC
d/b/a PANDORA @ GALLERIA,
a Florida limited liability company, and
PANDORA JEWELRY, LLC, a Maryland
limited liability company,

Defendants.

NOTICE OF FILING

Plaintiff, Katiria Ramos, gives notice of filing the attached Supplemental Declaration of Jennifer M. Keough Regarding Claims Received in Support of her Motion for Final Approval of Class Action Settlement.

Date: November 18, 2019

Respectfully submitted,

HIRALDO P.A.

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KOPELOWITZ OSTROW

FERGUSON WEISELBERG GILBERT

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 18, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

By: /s/ Joshua R. Levine
Joshua R. Levine
**KOPELOWITZ OSTROW
FERGUSON WEISELBERG GILBERT**

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Defendants.

**SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH REGARDING
CLAIMS RECEIVED**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer of JND Legal Administration LLC (“JND”). JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation (“Action”) as ordered by the Court in its Order Preliminarily Approving Class Action Settlement and Certifying the Settlement Class (“Order”). This Declaration is based on my personal

¹ Capitalized terms used and otherwise not defined in this Declaration shall have the meanings given such terms in the Settlement Agreement.

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.

3. This declaration is meant to supplement my declaration dated October 21, 2019.

REQUESTS FOR EXCLUSION

4. The Notices informed Class Members who wanted to exclude themselves from the Settlement (“opt-out”) that they must do so by sending an exclusion letter to the Settlement Administrator stating that they desire to opt-out of the Settlement or otherwise not participate in the Settlement, postmarked on or before October 7, 2019.

5. As of the date of this Declaration, JND has not received any exclusion requests.

OBJECTIONS

6. The Long Form Notice informed recipients that any Class Member who wished to object to approval of the Settlement could do so by submitting a written statement to the Court (with copies to Class Counsel and Defendants’ Counsel), postmarked no later than October 7, 2019.

7. As of the date of this Declaration, JND has not received any objections.

CLAIMS RECEIVED

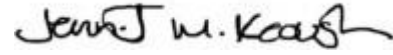
8. The Notices informed recipients that any Class Member wishing to receive a payment must complete and sign a Claim Form and submit it to JND, postmarked on or before December 4, 2019 if sent by mail, or received by December 4, 2019 if submitted online.

9. As of the date of this Declaration, JND has received a total of 921 Claim Forms (902 Claim Forms submitted electronically and 19 Claim Forms received by mail).

10. JND is in the process of receiving, reviewing and validating claim submissions. As of the date of this Declaration, JND has validated a total of 861 claims approved for payment. Based on my experience, I anticipate that the volume of claim submissions, as well as the total number of payable claims, will increase as the claim filing deadline approaches.

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

Executed on November 15, 2019 at Seattle, Washington.



JENNIFER M. KEOUGH