

Class Experts Group

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Class Experts Group (CEG) is a trusted partner in class action litigation, offering deep expertise in data analysis, expert witness testimony, and full-scale settlement administration.



CLASS EXPERTS GROUP LLC

Expert Services Data Analysis Notice & Administration

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1 INTRODUCTION TO CLASS EXPERTS GROUP

The executive team heading Class Experts Group boasts decades of combined experience in delivering complex litigation support in class action litigations involving the Telephone Consumer Protection Act (TCPA), the Employee Retirement Income Security Act (ERISA), human rights, data breach, the Real Estate Settlement Procedures Act (RESPA), insurance, the Fair Labor Standards Act (FLSA), antitrust, securities fraud, and other class action matters.

Established in 2018 as a boutique firm with a worldwide presence, CEG offers a comprehensive range of services tailored to intricate litigation support. Our offerings include data analysis, expert witness testimony, and class action notice and settlement administration. Whether your case demands data assessment, identification and location of class members, class notice, claims processing, or settlement fund distribution, CEG stands ready to be an essential ally on your team. We partner closely with you, offering seasoned advice based on our wealth of experience.

Founded on principles of collaboration and transparency, CEG has cultivated a distinct, women-directed business environment that prioritizes quality in all matters. We promote an atmosphere of honesty and fair dealing, extending these values to clients and class members alike.

These principles, combined with our unique service offerings combining data analysis, expert testimony, and settlement administration, position CEG as a trailblazer and innovator in the industry. Our clients consistently choose CEG because we are problem solvers and team players, offering workable solutions customized to each case's unique specifications.

2 OUR SERVICES

2.1 DATA ANALYSIS

In complex litigation, data analysis involves the systematic examination of available records, files, and documents using analytical and logical reasoning to scrutinize each element within the provided data. Information is gathered from various sources, reviewed thoroughly, and then processed to derive conclusions, findings, and opinions.

CEG's proficiency in deciphering and articulating the story embedded within the data allows our expert witnesses to present that data efficiently and effectively in written reports and live testimony supported by factual and data-based foundations.

CEG's data analysis services are constructed on a reliable technology framework and are based on well-documented procedures, ensuring the secure collection, management, and handling of data. Our streamlined approach allows us to evaluate data productions of any scale with precision and cost efficiency.

CEG's expert witnesses regularly evaluate and provide opinions for class cases, including but not limited to, the following categories of records:

- Automated Audio File Transcription
- Banking
- Bankruptcy
- Billing
- Consent
- Credit Card
- Customer Relationship Management (CRM)
- Email
- Facsimile
- Government
- Insurance
- Internet Protocol (IP)
- Lead Files
- Medical
- Mortgage
- National Do Not Call Registry (NDNCR)
- Retailer
- Retirement Plan
- Telephone Call Logs
- Text
- Transactional
- United States Postal Service (USPS)
- Vehicle Deal Jackets
- Vital Statistics
- Voicemail Logs

2.2 EXPERT TESTIMONY AND REPORTING

Expert witness testimony plays a pivotal role in nearly all putative class action lawsuits, particularly during the class certification phase where such evidence is relied upon to address the requirements of Federal Rule of Civil Procedure 23.

For over two decades, CEG's team of experts has provided opinions and testimony in hundreds of consumer protection cases.

CEG's experts offer strategic insight and provide testimony on multiple aspects of litigation, including numerosity, ascertainability, class member identification and location, adequacy of notice, and settlement administration procedures. CEG's experts offer impartial testimony, forming independent opinions grounded in data, facts, and evidence. Class certification, in particular, frequently involves a "battle of experts". Our experts work closely with you to prepare and deliver testimony to reinforce the distinct claims in your case.

CEG's expert witnesses also address opposing reports, present rebuttal opinions, overcome Daubert challenges, provide deposition testimony, and appear at trial. In fact, CEG's senior expert witness has testified in trials and numerous class certification and other court hearings, bringing extensive cross-examination experience to the proceedings.

Other services include mediation preparation which involves developing a strategy, setting goals, and understanding the interests and positions of parties. CEG conducts preliminary data analysis based on data produced during initial discovery and provides a basis for our clients to understand the value of the case. This is a critical step for a successful negotiation process.

CEG assists with the equally important step of damages analysis, which includes analysis to support the class definition and determining the types of damages incurred by the proposed class. CEG then helps develop an efficient and effective distribution plan to allocate the damages among class members, often involving a claims process and a proposed formula for fair allocation.

CEG reviews proposed settlement terms as they relate to the class notice plan, claims administration and fund distribution and estimates the cost.

Finally, once the terms of the settlement are agreed upon, pre-settlement consultation involves discussions and planning to ensure that the settlement process is managed efficiently and effectively. Key aspects of the consultation process include reviewing the draft settlement agreement, establishing a case-specific timeline that accommodates the

components proposed under the terms of the settlement, and evaluating notice plan adequacy, claims validation requirements, and settlement fund distribution protocols. CEG develops methods for identifying, locating, and notifying class members and a detailed notice plan that complies with legal and due process requirements.

2.2.1 Representative Cases

Krakauer v. Dish Network, LLC, Civil Action No: 14-cv-333 (M.D.N.C.)

The court denied a Daubert challenge. Ms. Verkhovskaya’s expert testimony at a jury trial was pivotal, leading the jury to award damages for each violation she identified.

Later, in denying a motion to overturn the jury verdict awarding the class more than \$20 million in relief, the court found “Ms. Verkhovskaya provided clear, cogent testimony explaining her methodology and the bases for her opinions.” Damages in the case were trebled to more than \$61.5 million, and the award was upheld on appeal.

McMillion v. Rash Curtis & Associates, Case No. 3:16-CV-03396 (N.D. Cal.)

Ms. Verkhovskaya used reverse append and other techniques to separate debtors from non-debtors in the defendant’s telephone call data, and to identify telephone calls made to wireless telephone numbers. Ms. Verkhovskaya’s expert testimony at a jury trial was pivotal, leading the jury to award damages for each violation she identified. The class was awarded more than \$267 million in damages, at the time one of the largest TCPA damages awards ever.

2.3 CLASS ACTION ADMINISTRATION

2.3.1 Class Action Notice

CEG is a nationally recognized expert in the design, preparation and dissemination of legal notice. Ensuring that class members are aware of, understand, and can act on their legal rights is the essence of Federal Rules of Civil Procedure Rule 23. By using industry-approved measurement processes and accredited consumer data, CEG develops notice programs that fully comply with the requirements of Rule 23 and its state equivalents. Our notice programs have never faced a successful objection.

CEG’s case-specific notice programs utilize available class data, demographic, geographic, behavioral, and interest-based criteria to effectively connect with specific audiences via direct mail, email, third-party notice, publication, and digital media. Advancements in technology and communication outlets offer an expanding range of methods to efficiently and effectively notify class members.

Courts have also endorsed the effectiveness of CEG’s notice programs. CEG was appointed as the Settlement Administrator in the matter of *Leslie Ann Wilkie Peltier, et al. v. Deb Haaland, et al.*, No. 20-cv-03775 (D. D.C.), a class action lawsuit to redress alleged breaches of trust by the United States Department of the Interior, the United States Department of the Treasury, and the United States of America with respect to the accounting and management of two Judgment Awards of the Indian Claims Commission (ICC). The \$59 million settlement provided relief to several generations of tribal families. As part of this litigation, CEG’s team worked over the course of several years to develop a novel class notice plan and claims adjudication process that would effectively and efficiently distribute settlement funds to surviving tribal members and their heirs, many of whom are ageing.

At the preliminary approval hearing, presiding Federal Judge Thomas F. Hogan overseeing the settlement noted that CEG was “instrumental in helping to shape the deal...”

At the final settlement approval fairness hearing in *Leslie Ann Wilkie Peltier, et al. v. Deb Haaland, et al.*, No. 20-cv-03775 (D. D.C.), class counsel noted that CEG “made extensive efforts to identify and reach” the class and that CEG’s class notification efforts “have met or gone beyond the Rule 23 and due process...requirements...The notice program here has been thorough...” In his order granting final class action settlement agreement approval, Federal Judge Thomas F. Hogan noted that CEG’s class notification process provided “the best notice practicable under the circumstances...and it was reasonably calculated to reach the class members.”

2.4 CLAIMS ADMINISTRATION

Claims administration plays a vital role in the successful resolution of class action settlements, fulfilling several essential functions. It manages the often complex task of processing thousands or even millions of claims in an organized, accurate manner. This reduces the risk of errors and fraud, ensuring a higher degree of precision throughout the process.

Additionally, claims administration provides critical support to class members by guiding them through the claims submission process and addressing their questions or concerns. This ensures that class members fully understand their rights and the steps involved in seeking compensation. Another key function is the timely distribution of settlement funds, which helps prevent unnecessary delays in compensating class members. Finally, the administration process handles any appeals from class members who dispute their claim outcome or compensation amount, ensuring fairness and consistency in the overall distribution of funds.

In managing settlement, CEG brings decades of experience handling the sensitive and complex data for clients across a range of industries, from financial and healthcare to manufacturing and services. CEG's pre-existing management processes and years of operations with complex systems and infrastructure deliver proven value to our clients.

2.4.1 Claims Management

At CEG, we pride ourselves on maintaining the highest standards of quality and security to ensure meticulous attention to detail and swift resolution. Our claims management system is designed to ensure the secure, transparent, and efficient administration of class action lawsuits. We incorporate several essential components to comply with legal requirements while maintaining ethical and data protection standards.

CEG ensures strict adherence to the provisions outlined in the court-approved settlement agreement. This includes meeting the eligibility criteria for claimants and executing the distribution plan. CEG's system includes comprehensive anti-fraud measures. We maintain detailed audit trails, creating clear records of all transactions and decisions throughout the claims process.

CEG emphasizes reporting and transparency as critical components of our claims management system. We provide regular, detailed reports to the court and attorneys, outlining the status of claims, including the number of claims received, approved, or denied, as well as the amounts distributed. In today's privacy-conscious environment, CEG's system complies with relevant data protection and privacy laws.

2.4.2 Claims Processing

At CEG, class action claims processing and auditing is a meticulous and structured process designed to ensure fairness and accuracy in the distribution of settlement funds, safeguarding the interests of both claimants and defendants. Our process begins with the collection of claims, where all submitted forms, documents, and supporting evidence from class members are gathered. This is followed by a precise data entry process to ensure that all information is accurately recorded in our claims management system.

Once data is entered, CEG undertakes a thorough verification of claims, ensuring each claim meets the eligibility criteria outlined in the settlement agreement. This involves reviewing supporting documentation, such as financial records or medical reports, and validating data by cross-referencing internal and external databases to confirm the accuracy of claims.

CEG's system allows class members to file claims online, offering a convenient and efficient way to participate in the settlement process. Online claim filing simplifies the submission process, enabling class members to easily provide the necessary information.

This digital option reduces administrative costs, speeds up the processing of claims, and increases participation rates by eliminating barriers such as mailing delays or lost paperwork. Additionally, CEG's online filing system offers features like automatic confirmation of submission, providing class members with greater transparency and assurance throughout the claims process.

The next phase, claims analysis and evaluation, involves calculating compensation amounts in accordance with the settlement terms. During this process, we also identify and remove duplicate claims to prevent double payments. Our dedicated disbursements team brings extensive expertise in fraud detection and prevention, performing daily monitoring and account reconciliation to protect financial transactions, and are trained to respond to red flag alerts. With stringent quality controls in place, we ensure precise and secure payment processing throughout the disbursement phase.

Throughout the auditing process, CEG maintains detailed audit trails to ensure transparency and accountability. We generate compliance reports summarizing the findings, including statistics on approved, denied, and disputed claims, providing a comprehensive overview of the claims auditing process.

2.4.3 Data Security

CEG has implemented strict internal protocols to prevent fraudulent activity and protect the sensitive information of our clients and class members. To ensure data integrity, all modifications must be made through CEG's proprietary applications, eliminating direct access to production databases. Every change to our systems is meticulously tracked through a version control system, with all program modifications subject to auditing. Access to case data is restricted to authorized personnel assigned to the matter, reinforcing security and compliance.

Additionally, if data modifications are necessary, the original records are preserved alongside the edited versions, with the system logging the identity of the individual making the change. These measures provide a robust framework for maintaining accuracy, security, and accountability in all aspects of our operations.

2.5 TELEPHONE AND EMAIL SUPPORT

Integral to a comprehensive notice plan is providing 24/7 communication accessibility means of communication by telephone and email. CEG's case communication specialists are trained and equipped to handle a wide range of class member inquiries, significantly reducing the need for escalations to Counsel by providing thorough and accurate responses. With a scalable team and the latest technology, CEG's call center is equipped to adapt to a variety of case sizes.

CEG's communication center services include, but are not limited to, the following:

- Dedicated toll-free number for each case
- Case-specific, client-approved call script
- Interactive Voice Response (IVR) system
- Answering frequently asked questions
- 24 hours a day, 7 days a week access
- Assisting with claim form completion
- Inbound and outbound call tracking
- Multi-lingual translation and transcription
- Detailed reporting
- Voicemail transcription
- Forwarding communications to class counsel, if needed
- Live operators per case requirements

Call center agents and call scripts are regularly monitored throughout the administration, and adjustments are made, as needed, based on the nature of inquiries and needs of class members.

2.6 SETTLEMENT FUND DISTRIBUTION

Once the settlement allocation determinations have been calculated, audited, and finalized, the fund distribution commences. There are various forms of payment options available in a class action, including but not limited to:

- Check payment
- Rebate, refund, or credit
- Retirement or pension plan distribution
- Product repair or replacement
- Coupon or voucher
- Goods or services
- Gift card
- Injunctive relief

New forms of settlement payments, such as Zelle, PayPal, and Venmo, Amazon Pay, Google Pay, Apple Pay, e-checks, ACH, and more are becoming increasingly popular as efficient alternatives to traditional check distributions. These digital payment methods offer faster and more convenient ways for class members to receive their settlement funds, often providing near-instant access to their compensation. By leveraging these platforms, CEG reduces administrative costs and eliminates issues like lost or uncashed checks. These payment options provide tracking and receipt confirmation, giving all parties clear records of the transaction.

2.7 QUALIFIED SETTLEMENT FUND MANAGEMENT AND REPORTING

At CEG, we specialize in the comprehensive management of Qualified Settlement Funds (QSFs), a vital component of settlement administration.

With decades of experience, we manage every phase of QSF administration — including fund creation, record-keeping, oversight, and tax reporting—ensuring settlement funds are handled efficiently and in full compliance with all legal and regulatory requirements.

The process begins with obtaining court approval, where we assist in preparing and submitting the necessary documentation to establish the QSF. Once the court order is secured, CEG facilitates the complete setup of the fund, including obtaining an Employer Identification Number (EIN) from the IRS for tax compliance purposes. We also establish a segregated, federally insured bank account to hold the settlement proceeds, ensuring the security, transparency, and traceability of all financial transactions.

As part of our QSF management services, CEG provides escrow agency support to safeguard and manage the settlement funds throughout the lifecycle of the administration. We deliver detailed reporting and reconciliation services to ensure full transparency and accountability.

Our team generates comprehensive financial reports that monitor all key fund activities — deposits, distributions, investments, earnings, and administrative expenses — giving stakeholders a clear and real-time view of the fund's status and performance.

In collaboration with experienced tax professionals, CEG ensures that all required tax returns are prepared and filed accurately and on time, addressing any federal, state, or local withholding obligations. We maintain rigorous compliance with all applicable laws, including complex banking and securities regulations, ensuring the QSF operates within the full scope of legal mandates.

Our reconciliation process ensures the accuracy and integrity of all fund transactions. This includes the use of MICR encoding and bank-approved checks, positive pay verification, regular bank reconciliation, maintenance of investment records, and internal accounting logs. By maintaining precise, up-to-date records, CEG ensures that the QSF adheres to all court orders and regulatory requirements, while also providing the necessary documentation for tax filings, audits, and other legal obligations.

If there are unclaimed or undistributed funds at the conclusion of the administration, CEG will assist in implementing the options defined by the settlement agreement and the parties involved. This may include reversion, where the remaining funds are returned to the defendant, or a cy pres distribution to a designated charitable organization, as specified in the agreement. In instances where escheatment is necessary, we ensure that unclaimed funds are transferred to the state in accordance with unclaimed property laws. CEG provides expert guidance in executing these options, ensuring full compliance with court orders and all regulatory requirements while respecting the terms agreed upon by the parties.

3 CONTACT US

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