FILED
11-04-2026
Clerk of Circuit Court
Waukesha County
2025CV002181

IN THE CIRCUIT COURT OF
WAUKESHA COUNTY, WISCONSIN

RICHARD DUSTERHOFT, *et al,*	)	
	)	
Plaintiffs,	)	
	)	
v.	)	**Case No. 2025CV002181**
	)	
ONETOUCHPOINT CORP.,	)	
	)	
Defendant.	)	
	)	

DECLARATION OF DUE DILIGENCE

I, Ally Quiring, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am over the age of twenty-one. I am competent to give this declaration. This declaration is true and correct to the best of my knowledge, information, and belief.

2. I am currently a Project Manager for Analytics Consulting, LLC (hereinafter "Analytics"), located at 18675 Lake Drive East, Chanhassen, Minnesota, 55317. I am responsible for overseeing the settlement administration in the above-captioned litigation.

3. Analytics was engaged to provide settlement administration services in the *Dusterhoft v OneTouchPoint, Corp.* Settlement. In this capacity, Analytics was charged with (a) establishing and maintaining a related settlement fund account; (b) establishing and maintaining a calendar of administrative deadlines and responsibilities; (c) printing and mailing the Notices of Class Action Settlement; (d) receiving and validating Requests for Exclusion, Objections and Claims submitted by Settlement Class Members; (e) processing and mailing payments to Settlement Class Members and Class Counsel; (f) establishing a dedicated Settlement Post Office Box; (g) creating and maintaining

Dedicated Toll-Free Number with an interactive voicemail help line and Settlement Website to provide Settlement Class Members with information concerning the Settlement and claims process; and (h) performing other tasks as the Parties mutually agree or the Court orders Analytics to perform.

4. On August 11, 2026, Analytics received a mailing list ("Class List") from Counsel for Defendant. The data file contained 4,382 records, including names and last-known mailing addresses for Settlement Class Members.

5. On July 24, 2026, Analytics received the Court-approved Long Form Notice ("Class Notice"), Postcard Notice, and Claim Form. The Class Notices advised Settlement Class Members of their right to request exclusion from the Settlement, object to the Settlement or file a Claim Form and the implications of each such action. The Class Notice advised Settlement Class Members of applicable deadlines and other events, including the Final Approval Hearing, and how they could obtain additional information.

6. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database ("NCOA") maintained by the U.S. Postal Service. The NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA would be utilized in connection with the mailing of the Postcard Notices to Settlement Class Members with missing or incorrect email addresses.

7. Analytics identified 27 duplicate Settlement Class Member records and excluded them from the mailing list.

8. This resulted in 4,355 Settlement Class Members.

9. Analytics established a toll-free phone number (866) 996-3808, a case website at www.OTPDataIncident.com with the ability to file Claim Forms electronically, and an email box at

OTPDataIncident@noticeadministrator.com to provide assistance and information to Settlement Class Members. The phone number, website, and email box were included in the Class Notices.

10. The Long Form Notice and Claim Form were available for download at the website, and are attached as **Exhibits 1** and **2**, respectively.

11. On August 17, 2026, Analytics mailed the approved Postcard Notice to the most current mailing address of 4,355 Settlement Class Members via USPS First Class Mail. A copy of the Postcard Notice is attached hereto as **Exhibit 3**.

12. Publication of the Notice for Injunctive Relief Class Members was provided through a dedicated settlement website. This website received 5,937 visits from at least 3,959 unique individuals.

13. If a Postcard Notice was returned by the USPS as undeliverable and without a forwarding address, Analytics performs an advanced address search using Experian, a reputable research tool. Analytics uses the name and previous address to locate a current address. 992 Postcard Notices were returned as undeliverable by the Post Office. Analytics located 489 updated addresses, and Postcard Notices were mailed to the updated addresses. 94 Postcard Notices were again returned as undeliverable by the Post Office.

14. 3,758 Settlement Class Members (86.29%) received a Class Notice.

15. Class Members could exclude themselves from the proposed settlement by mailing a written statement requesting exclusion from the Class to Analytics, postmarked by October 16, 2026. Analytics received zero (0) exclusion requests.

16. Class Members could object to the proposed settlement by mailing a written statement objecting to the settlement to Analytics, postmarked by October 16, 2026. Analytics received zero (0) objections.

17. Settlement Class Members must return a valid Claim Form postmarked by November 16, 2026, in order to receive a settlement payment from the proposed settlement. As of the date of this declaration, a total of 264 Claim Forms have been received. 260 of those Claim Forms were filed online; 4 of them were mailed back to Analytics at the address provided on the Claim Forms. The claims rate is 6.04%.

18. To date, 6 timely Claim Forms are currently partially deficient due to insufficient supporting documentation for their ordinary and/or extraordinary out-of-pocket losses, but each is currently valid for at least one other Settlement Benefit. All 6 claims are going through the deficiency process. The deadline to submit a corrected Claim Form is November 16, 2026.

19. Analytics' work in connection with this matter will continue with the completion of claims processing, the issuance and mailing of the settlement checks and digital payments, and to do the necessary tax reporting for the settlement fund.

20. The current estimated cost for Settlement Administration, including both notice and claims administration, is $19,816.

I declare under penalty of perjury that the foregoing is true and correct.

Signed by:
Ally Quiring
8479C677523A4A8...

Dated: November 4, 2026 Ally Quiring