

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

RYAN RODRIGUEZ, REENA B.  
FRAILICH, LOREDANA NESCI,  
JENNIFER BRAZEAL and LISA GINTZ,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

vs.

WEST PUBLISHING CORPORATION, a  
Minnesota Corporation dba BAR/BRI, and  
KAPLAN, Inc., a Delaware Corporation.

Defendants.

AND CONSOLIDATED ACTION

Case No. CV 05-3222 R(MC<sub>x</sub>)

DECLARATION OF  
RICHARD L. SARTORY

**DECLARATION OF RICHARD L. SARTORY**

I, Richard L. Sartory, declare as follows:

1. I am over 21 years of age and am not a party to the above-captioned action (the "Action"). I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify competently with regard to those facts.

2. I am a Senior Project Administrator for Complete Claim Solutions, LLC ("CCS."). CCS was appointed as the Notice Administrator to assist in the process of providing notice to the members of the class in the pendency phase of this Action, and subsequently named the Claims Administrator in the Settlement phase.

3. As of September 5, 2008, CCS has received 88,200 claim forms from 87,587 distinct claimants, representing 124,053 BAR/BRI bar review courses.

4. The claim forms reflect a total of approximately \$226,932,443 in BAR/BRI course review purchases which are the subject of the Action (the "Relevant Purchases").

5. Of the Relevant Purchases referenced in paragraph 4 above, CCS has determined that \$196,489,263 represent valid claims pursuant to the terms of the Settlement Agreement.

6. Of the Relevant Purchases referenced in paragraph 4 above, CCS has determined that there is \$30,443,180 in unresolved claims due to a variety of deficiencies. Deficiencies include the failure to sign the claim form, as well as discrepancies between the amount claimed to be paid for a qualifying course and the amount contained in the BAR/BRI database for that same course. These deficiencies can be resolved pursuant to the terms of the Settlement Agreement following the mailing of deficiency letters to the appropriate claimants.

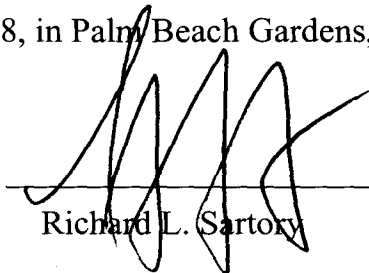
7. Deficiency letters are currently being mailed to the claimants whose claims have not been declared valid, requesting that they remedy all discrepancies related to their claims.

8. Based upon CCS' experience in similar settlements, it is anticipated that a majority of these unresolved claims will be resolved.

9. Barring unforeseen circumstances and assuming a resolution of the pending appeals, CCS will be in a position to commence with distribution of the Settlement Fund to Authorized Claimants by December 31, 2008.

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

Executed this 3rd day of October, 2008, in Palm Beach Gardens, Florida.



Richard L. Sartory