

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCOTT SMITH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:21-cv-10654
	)	
CHELMSFORD GROUP, LLC, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF BRYN BRIDLEY REGARDING  
DISTRIBUTION OF THE SETTLEMENT FUND**

I, Bryn Bridley, hereby declare as follows:

1. I am the Director of Project Management at Atticus Administration, LLC (“Atticus”), a firm providing class action and claims administration services. I have extensive experience with class action notice and claims administration. I am fully familiar with the facts contained herein based upon my personal knowledge and involvement with the above-captioned action.

2. Atticus is Settlement Administrator for the above-captioned action and is responsible for carrying out the terms of the “*Class Action Settlement Agreement and Release*” (“Settlement Agreement”) as approved by the Court in its Preliminary Approval Order dated September 23, 2022 and its Final Order and Judgment dated February 1, 2023.

3. I submit this declaration to inform the Parties and the Court of the distribution activities Atticus completed with respect to this action. This declaration describes the: (i) receipt and allocation of the settlement funds, (ii) distribution of payments to participating Class Members, and (iii) handling of residual funds.

**I. RECEIPT AND ALLOCATION OF SETTLEMENT FUNDS**

4. On February 10, 2023, Defendant funded the Qualified Settlement Fund (“QSF”) established by Atticus with \$29,331. Defendant wired an additional \$231,331 into the QSF on March 9, 2023 for a total funded amount of \$260,662. The funded amount included a \$29,331 overpayment in error, which was returned by wire on March 10, 2023. The \$231,331 settlement fund amount was allocated as follows:

- a. \$200,000 Class Counsel Fee Award to Northeast Justice Center,
- b. \$2,000 Incentive Award to Class Representative Scott Smith,
- c. \$17,231 Administrative Costs payment to Atticus, and
- d. \$12,100 for Settlement payments to members of the Rule 23(b)(3) Class.

**II. DISTRIBUTION OF SETTLEMENT PAYMENTS**

5. Pursuant to ¶ 4.2 of the Settlement Agreement, a one-time \$50 payment was allocated to each Occupied Lot. If more than one (1) Current Tenant or Resident was associated or otherwise obligated to pay rent for an Occupied Lot, each person was entitled to a *pro rata* portion of the one-time payment. Five hundred fifty-three (553) Current Residents or Tenants of 242 Chelmsford Commons Occupied Lots were eligible to receive settlement payments.

6. On March 16, 2023, Atticus sent settlement payments to 553 qualifying Class Members by U.S. first class mail. Payment amounts ranged from \$7.14 to \$50.00 and \$12,050 total was dispersed. One (1) Class Member who validly requested exclusion was not paid. Recipients had 180 days or until September 12, 2023 to negotiate their settlement payments. A true and correct copy of the check template and cover letter is attached hereto as **Exhibit A**.

7. Of the 553 payments distributed, seven (7) checks were returned to Atticus as undeliverable without forwarding information. The seven (7) undeliverable records were sent to a professional service for address tracing where address updates were obtained for three (3) records

and were not obtained for the other four (4) records. Payments were promptly remailed to the three (3) new addresses obtained from trace. One (1) of the remailed checks was returned as undeliverable a second time. Thus, 548 checks or 99.10% of the payments dispersed were successfully mailed.

8. In total, 396 payments totaling \$9,286.68 were timely negotiated and 157 checks the sum of which is \$2,763.32 were not cashed. Otherwise stated, 71.61% of the Settlement Class cashed their payments to claim 77.07% of the distributed settlement funds.

## **II. RESIDUAL FUNDS**

9. The current balance in the QSF is \$2,813.32, which includes \$2,763.32 in unclaimed funds and \$50.00 in undistributed funds. Pursuant to ¶ 19 of the Settlement Agreement, Atticus paid the \$2,813.32 account balance to The Massachusetts IOLTA Committee upon execution of this declaration.

**I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and executed on October 27, 2023 in Mendota Heights, Minnesota.**



Bryn Bradley

## **EXHIBIT A**

CHELMSFORD SETTLEMENT  
C/O ATTICUS ADMINISTRATION  
PO BOX 64053  
SAINT PAUL MN 55164

CHECK DATE: 3/16/2023  
CHECK NUMBER: «CheckNum»  
CHECK AMOUNT: «CheckAmount»  
CHECK EXPIRATION: 9/12/2023  
CLAIMANT ID: «clmnt\_id»

«clmnt\_id»-«SEQ»  
«Name1»  
«addr1»  
«CITY» «ST» «ZIP»

Dear «Name1»,

This check is issued pursuant to the terms of the class action settlement in *Smith v. Chelmsford Group, LLC*, No. 1:21-CV-10654.

You have 180 days from the date of issue to deposit or cash this check. If you do not deposit or cash your check within 180 days, it will be voided. If you request a replacement check within 180 days, it will be issued pursuant to the terms of the settlement.

If you need to request re-issuance of your check for any reason, please write "VOID" on this check and mail it with a letter providing your name update or correction to: Chelmsford Class Action Administrator, c/o Atticus Administration, PO Box 64053, Saint Paul, MN 55164 or call 1-800-210-1732.

Regards,  
Office of the Settlement Administrator

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Chelmsford Group Settlement Fund  
PO Box 64053  
Saint Paul, MN 55164

The Huntington National Bank  
Box 1558  
Columbus, OH 43216 <sup>25-2</sup><sub>440</sub>  
(844) 200-6440

check# «CheckNum»

Date 3/16/2023

Pay to the  
Order Of «Name1»  
«SpellAmt»

\$ «CheckAmount»  
Dollars

«Name1»  
«addr1»  
«CITY» «ST» «ZIP»

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CASH PROMPTLY – VOID AFTER 9/12/2023