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Superior Court of California,
County of San Diego
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Clerk of the Superior Court
By M. Alvarez ,Deputy Clerk

Attorneys for Plaintiff Coziahr and the Certified Class

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

MARK COZIAHR, on behalf of himself and all
others similarly situated,

PLAINTIFF,

VS.

OTAY WATER DISTRICT; and DOES 1 through
200, inclusive,

DEFENDANTS.

Case No. 37-2015-00400000-CU-MC-CTL

CERTIFIED CLASS ACTION

**Declaration of Settlement Administrator
Regarding Class Notice**

Date: July 31, 2026

Time: 9:00 a.m.

Dept: C-67

Judge: Hon. Michael T. Smyth

I, Dana Boub, hereby declare and state as follows:

1 1. I am a Project Manager of Claims Administration for RG/2 Claims Administration
2 LLC ("RG/2"), whose address is 30 South 17th Street, Philadelphia, PA 19103. I am over the age
3 of 18. have personal knowledge of the matters set forth herein and, if called upon to do so,
4 could testify competently to them.

5 2. RG/2 Claims is an experienced and full-service class action settlement
6 administrator offering notice, claims processing, allocation, distribution, tax reporting, and class
7 action settlement consulting services. RG/2's experience includes the provision of notice and
8 administration services for settlements arising from antitrust, consumer fraud, civil rights,
9 employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2 has
10 administered and distributed more than \$2 billion in class action settlement proceeds. The
11 executive profiles and the company overview are available at www.rg2claims.com.

12 3. On May 1, 2026, RG/2 Claims received an multiple excels file from Counsel
13 containing the names, mail and email addresses for 88,283 Settlement Class Members.

14 4. To locate the most recent addresses for the Settlement Class Members, RG/2
15 Claims ran the class data file through the United States Postal Service's National Change of
16 Address database before mailing the Postcard Settlement Class Notice.

17 5. On May 19, 2026, RG/2 Claims arranged for the printing and mailing by First
18 Class U.S. Mail, of the Postcard Settlement Class Notice to the 16,544 Settlement Class
19 Members for whom no email addresses were provided. A non-personalized copy of the mailed
20 Notice is attached hereto as **Exhibit A**.

21 6. On May 19, 2026, RG/2 Claims arranged for the emailing of the Email Settlement
22 Class Notice to each of the 71,739 Settlement Class Members for whom email addresses were
23 provided. A non-personalized copy of the emailed Notice is attached hereto as **Exhibit B**.

24 7. A total of 1,322 mailed Notices have been returned by the United States Postal
25 Service as undeliverable. RG/2 performed a standard skip-trace procedure for each
26 undeliverable address and was able to re-mail 889 of the Notices to updated addresses. A total
27 of 433 Notice packets remained undeliverable. Therefore, 16,111 Settlement Class Members, or

approximately 97.38% of the class for whom email addresses were unavailable, received notice via U.S. Mail.

8. A total of 287 email Notices were undeliverable. Therefore, 71,452 Settlement Class Members, or approximately 99.59% of the class for whom email addresses were available, received notice via email.

9. On May 19, 2026, RG/2 Claims updated the Settlement Website at www.otaywaterdistrictcase.com. The website includes the following:

a. The “Homepage” contains a brief summary of the Settlement and advises the Class of their rights under the Settlement.

b. The “Court Documents” page contains pdf copies of the Plaintiff’s Notice of Motion for Preliminary Approval, Declaration of Steven Tindall ISO Motion for Preliminary Approval, Settlement Agreement, Order Granting Preliminary Approval, [Proposed] Order Granting Attorneys’ Fees, Costs, and Service Award, Plaintiff’s Notice of Motion and Motion for Attorneys’ Fees, Costs, and Service Award, Declaration of Steven Tindall ISO Plaintiff’s Motion for Attorneys’ Fees, Costs, and Service Award, Stipulation and Order Approving Class Notice and Notice Administrator and Rescheduling Trial Date, Second Amended Complaint, Order Granting Class Certification, Order Defining Statute of Limitations, Statement of Decision Phase 1, Statement of Decision Phase 2, Judgment, and Coziahr Appellate Order Affirming Judgment in Part and Vacating as to Amount of Refund.

c. The “Notice” page contains pdf copies of the Notice of Class Action Settlement (May 6, 2026) and Notice of Class Action.

d. The “Account Refund Status” page contains instructions for entering your Otay Account Number and receiving your refund status.

e. The “Contact Us” page contains the contact information of the Settlement Administrator and Settlement Class Counsel.

10. RG/2 Claims made available the Toll-Free Telephone number 1-866-742-4955. To date, RG/2 Claims has received 155 calls from Settlement Class Members through that telephone number.

11. On May 19, 2026, RG/2 Claims made available the email address OtayWaterSettlement@rg2claims.com for Class Member inquiries. RG/2 Claims received a total of 64 emails from Settlement Class Members through that email address.

12. The Notices informed Class Members of their right to request exclusion from the settlement, provided the request is received or postmarked on or before July 3, 2026. To date, RG/2 Claims has received no Requests for Exclusion from the Settlement.

13. The Notices also informed Class Members of their right to object to the Settlement, provided the objection is received or postmarked on or before July 3, 2026. To date, RG/2 Claims has not received or been advised of any objections to the settlement.

14. RG/2 Claims' costs to complete the notice and administration are \$64,105.

15. RG/2 received from Counsel an excel spreadsheet prepared by Plaintiff's litigation expert Greg Clumpner, listing refund calculations for each unique customer account ID. Based on the Settlement and that expert calculation, 15,568 class members have positive refund amounts and will receive refunds under the Settlement. RG2 has prepared a prorated refund calculation for each of those class member accounts based on the amount of the Settlement Fund available to distribute to the class, and will update that calculation following any Order from the Court awarding attorneys' fees, costs, and other expenses. RG2 will administer the payment of settlement funds to former customer class members, who will be able to select their preferred payment method (including mailed checks or electronic payment methods like Venmo, PayPal, or Zelle).

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

EXECUTED at Philadelphia, PA and DATED this 8th day of July, 2026.

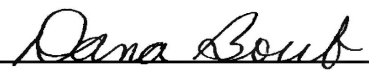
By: 

EXHIBIT A

Court-Approved Legal Notice



This is an important notice
about a class action lawsuit.

Coziahr v. Otoy Water District
c/o RG/2 Claims Administration LLC
P.O. Box 59479
Philadelphia, PA 19102-9479

PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE PAID
MAG

Electronic Service
Requested



NUMERIC EQUIVALENT

Postal Service: Please do not mark barcode

<<FirstName>><<LastName>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip>>
<<Country>>



San Diego Superior Court
Coziahr v. Otay Water District
Case No. 37-2015-00400000-CU-MC-CTL



Class Action Notice

Authorized by the Superior Court

Were you a single-family residential water customer of Otay Water District any time between July 14, 2014 and December 31, 2022?

There is a \$12,000,000 settlement of a lawsuit.

You may be entitled to money.

You can visit <https://www.otaywaterdistrictcase.com> to learn more.

Key Things to Know:

- This is an important legal document.
- If you take no action, any ruling from the court will apply to you, and you will not be able to sue Otay Water District about the same issues.
- If you have questions or need assistance, please call (866) 742-4955
- You can learn more at <https://www.otaywaterdistrictcase.com> or by scanning the QR code.

EXHIBIT B

If you were a single-family residential water customer of Otay Water District between July 14, 2014 and December 31, 2022, the settlement of the Class Action Lawsuit *Coziahr v. Otay Water District*, 37-2015-00400000-CU-MC-CTL may affect your rights.

For complete information, visit <https://www.otaywaterdistrictcase.com> or call (866) 742-4955.

You are not being sued. This is not a solicitation from a lawyer. This Email Notice was authorized by the Superior Court of California, County of San Diego.

You received this email notice because you may be a member of the group of people affected, called the “class.” This notice tells you how to get more information.

If you were a single-family residential water customer of Otay Water District any time between July 14, 2014 and December 31, 2022, you may be entitled to payment as part of the settlement of this lawsuit.

What is the lawsuit about?

A Settlement has been reached in a class action lawsuit against Otay Water District. The lawsuit concerns whether Otay’s single-family residential water rates between July 14, 2014 and December 31, 2022 were unconstitutional. Otay in the lawsuit denies it did anything wrong. The Settlement is a compromise to end the lawsuit – it does not determine who is right. The lawsuit is called *Coziahr v. Otay Water District*, 37-2015-00400000-CU-MC-CTL, and is pending in the San Diego Superior Court.

Your options:

Option 1: Take no further action to get payment from the settlement. To receive payment, the settlement administrator may need to verify your contact information, and if you are no longer a customer, you will be asked to choose your preferred payment option.

Option 2: Submit an Opt-Out form to get no payment but keep the right to sue Otay Water District about the same issues. Your opt-out must be received by **July 3, 2026** to be valid.

Option 3: Object. Tell the court why you don’t like the settlement. Your objection must be received by **July 3, 2026** to be valid.

For complete information, visit <https://www.otaywaterdistrictcase.com> or call (866) 742-4955.