**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JACK DIEP, JORY LEVY, JAMES DAYAP, MARVIN CUTCHINS, and RAY CHARLES, JR., individually and on behalf of all others similarly situated,

Plaintiffs,

v.

LIBERTY MEDIA CORPORATION d/b/a FORMULA ONE HEINEKEN SILVER LAS VEGAS GRAND PRIX, a foreign corporation; LAS VEGAS GRAND PRIX, INC., a Nevada corporation,

Defendants.

Case No. 2:23-cv-02124-GMN-NJK

**DECLARATION OF TINA CHIANGO REGARDING FINAL CLAIM STATUS AND IN SUPPORT OF PLAINTIFFS' SUPPLEMENTAL BRIEF RE COSTS INCURRED BY SETTLEMENT ADMINISTRATOR**

I, TINA CHIANGO, hereby declare and state as follows:

1. I am the Director of Claims Administration for RG/2 Claims Administration LLC ("RG/2 Claims"), whose address is 30 South 17th Street, Philadelphia, PA 19103. I make this Declaration Regarding Final Claims Status and in Support of Plaintiffs' Supplemental Brief Re Costs Incurred By Settlement Administrator. I am over the age of 18, have personal knowledge of the matters set forth herein, and if called upon to do so, could testify competently to them.

2. The Court has appointed RG/2 Claims as settlement administrator in this matter. Dkt. 88 at 3.

3. In November 2025, Class Counsel invited RG/2 Claims to provide a proposal and cost estimate for notice and claims administration services. Based on the information Class Counsel provided to RG/2 Claims, RG/2 Claims estimated the cost of notice and claims administration at $76,306.

4. As stated in my previous declaration dated August 6, 2026, while disseminating notice, RG/2 Claims identified 1,818 person/entities in the class list for whom RG/2 did not have a valid email or mailing addresses. Dkt. 91-7 at ¶ 9. RG/2 Claims used searches through both Lexis/Nexis Accurint and TLO to try and obtain either a better email address or a mailing address for anyone who RG/2 did not have a valid mailing address for. *Id.* Prior to submitting any searches through TLO, RG/2 reached out to Class Counsel and advised that this additional search, which was not part of our original estimate, would be an added cost. *Id.* Once Class Counsel gave the approval, we submitted the file to TLO. *Id.* As a result, RG/2 obtained 649 new email addresses and 239 mailing addresses, which resulted in a charge of $275.40 ($.15 per hit (651) from Accurint and $.75 per new address from TLO (237)). *Id.*

5. As a result of this additional charge, at the time of my August 6, 2026 declaration, RG/2 Claims' new estimate for its costs came to $76,581.40 ($76,306 + $275.40).

6. Having successfully disseminated class notice in a manner consistent with the

terms of the Settlement Agreement and the Preliminary Approval Order, Dkt. 91-7 at ¶¶ 5-16, RG/2 Claims now estimates its costs will be $59,399 with the difference going to the Class.

7. To date, RG/2 Claims has incurred $36,973.95 and estimates additional fees and costs totaling $22,425.05 to perform the distribution and post-distribution services. *See* Exhibit A. RG/2 is requesting to be paid $59,399 in fees and costs from the Settlement Fund.

8. As of July 30, 2026, RG/2 Claims had 8,996 claims that were expected to be eligible for payment. Dkt. 91-7 at ¶ 14. 8.After that date and through the claim filing deadline of August 27, 2026, RG/2 Claims received additional claims. RG/2 Claims also sent letters to various claimants who filed deficient or denied claims, allowing them 20 days to cure any deficiency or denial.

9. Consistent with Section VIII.3 of the Settlement Agreement, on September 3, 2026, RG/2 Claims provided all parties with a spreadsheet detailing the number of approved claims, the number of opt-outs, the number of objections, and the number of denied claims in the Class. On October 23, 2026, RG/2 Claims provided all parties with an updated version of that list.

10. To date, RG/2 Claims has determined that 9,032 claimants have been approved and eligible for payment from the Settlement Fund.

11. The updated Payouts for Thursday-Only Tickets are estimated at approximately $68.28 per ticket based on the number of automatic payments for which RG/2 Claims has email and mail addresses and the number of valid claims received.

12. The updated Payouts for Three-Day Tickets are estimated at approximately $120.94 per ticket based on the number of automatic payments for which RG/2 Claims has email and mail addresses and the number of valid claims received.

13. RG/2 Claims has not received any additional opt-out requests beyond the two I previously identified in my August 6, 2026 declaration. Dkt. 91-7 at ¶ 19 (attaching the two-opt outs as Exhibit B).

14. To date, RG/2 Claims has not received or been made aware of any Objections

to the Settlement.

I declare under the laws of the United States of America and the State of Pennsylvania that to the best of my knowledge the foregoing is true and correct.

Executed on October 28, 2026 at Philadelphia, Pennsylvania.

Tina Chiango

# EXHIBIT A

RG2 Claims Administration LLC

www.rg2claims.com

Presented by:
William W. Wickersham, Esquire
Vice President, Business Development and Client Relations
(212) 471-4777

**Notice & Claims Administration Services related to:**
**Diep v. Liberty Media Corp**

| | Quantity | Amount |
|---|---|---|
| ***Case Intake*** | | |
| Case Website | 1 | $ 1,100.00 |
| Portal Set Up | 1 | $ 2,500.00 |
| Monthly maintenance | 5 | $ 625.00 |
| Process Data | 10 | $ 2,950.00 |
| Spanish Translation | 4,879 | $ 1,073.38 |
| Project Mgt-Intake | 1 | $ 2,100.00 |
| **Subtotal: Setup Cost** | | **$ 10,348.38** |
| ***Class Member Identification & Notification*** | | |
| Set up Email Notice | 1 | $ 750.00 |
| Issue Notice Via Email | 23,499 | $ 2,349.90 |
| Mailed Notice | 1,960 | $ 1,568.00 |
| Postage for Mailed Notice (Includes International) | 1,960 | $ 1,590.68 |
| Accurint Costs for Email/Address Search | 651 | $ 97.65 |
| TLO Costs for Email/Address Search | 237 | $ 177.75 |
| Skip Tracing for Returned Notices | 287 | $ 215.25 |
| Remail Notice Postage | 12 | $ 60.00 |
| Remail Notice Postage | 12 | $ 9.36 |
| **Subtotal: Notification Cost** | | **$ 6,818.59** |
| ***Processing Costs*** | | |
| Input Opt-Outs and Report | 2 | $ 10.00 |
| Import Portal Claims | 75 | $ 93.75 |
| Process Paper Claim Submissions | 203 | $ 710.50 |
| Claims Auditing and Review of Docs | | $ 2,888.50 |
| Correspondence Regarding Deficient Claims | 191 | $ 143.25 |
| Postage for Def/Rejection Letters | 191 | $ 148.98 |
| Process Responses | 24 | $ 60.00 |
| **Subtotal: Processing Cost** | | **$ 4,054.98** |

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**Notice & Claims Administration Services related to:**
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| | Quantity | Amount |
|---|---|---|
| ***Telephonic Database Support*** | | |
| Live Operator* | | $ 1,500.00 |
| Respond to Emails | | $ 3,627.50 |
| *Minimum $150 Per month | | |
| **Subtotal: Telephone and Email Support** | | **$ 5,127.50** |
| Case Management, Data Management, Data Warehousing, Technical Support and Reporting to Counsel and the Court. | | $ 10,624.00 |
| **Subtotal: Project Management** | | **$ 10,624.50** |
| ***Total Notice and Administration Costs and Expenses*** | | **$ 36,973.95** |
| **Estimated Distribution and Post Distribution Services** | | |
| Check Batch Setup | 1 | $ 500.00 |
| Set up Digital Payments | 1 | $ 500.00 |
| Issue Digital Payments | 9,031 | $ 4,967.05 |
| Issue Paper Checks | 3,500 | $ 4,375.00 |
| Postage | 3,500 | $ 2,730.00 |
| Send Reminder for Unclaimed Payments | 4,500 | $ 1,125.00 |
| Returned Payments - Process & Update Database | 250 | $ 375.00 |
| Locator Services / Troubleshoot | 250 | $ 125.00 |
| Reissue Payments | 100 | $ 250.00 |
| Postage | 100 | $ 78.00 |
| ***Tax Preparation*** | | |
| QSF Tax Return Prep & Filing | 2 | $ 2,400.00 |
| Case Management, Accounting Support, Bank Recs and Reporting | | $ 5,000.00 |
| ***Notice and Administration Costs and Expenses*** | | **$ 22,425.05** |
| ***Total Notice and Claims Administration Costs and Expenses*** | | **$ 59,399.00** |