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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JACK DIEP, individually; JORY LEVY, individually; JAMES DAYAP, individually; MARVIN CUTCHINS; and RAY CHARLES, JR., on behalf of themselves and 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; DOE INDIVIDUALS 1-20, inclusive; and ROE CORPORATIONS 1-20, inclusive,

Defendants.

2:23-cv-02124-GMN-NJK

PLAINTIFFS' SUPPLEMENTAL BRIEF REGARDING COSTS INCURRED BY SETTLEMENT ADMINISTRATOR

Hearing Date: November 4, 2026
Hearing Time: 9:00 a.m.
Judge: Hon. Gloria M. Navarro
Courtroom: 7D

In Plaintiffs' Unopposed Motion for Attorneys' Fees and Costs and Class Representative Service Award ("Motion" or "Mot."), Dkt. 90, Plaintiffs inadvertently provided two different reimbursement figures for the Court appointed Settlement Administrator RG/2 Claims Administration LLC ("RG/2 Claims"). Pursuant to the Court's Minute Order, Plaintiffs' provide this supplemental brief to: (1) identify the amount requested for the settlement administrator reimbursement and (2) provide a cost breakdown for that requested amount.

Plaintiffs now request an amount up to **$59,399** for Settlement Administrator reimbursement. This amount is lower than either $76,581.40 or the $76,306 figures cited in Plaintiffs' Motion. *See* e.g. Mot. at 2, ln 11, and 5, ln. 26. The reason for this lower request is because since filing the Motion on August 7, 2026, RG/2 Claims has progressed in its work to disseminate class notice and to prepare to disburse payments to class members. Decl. of Tina Chiango Regarding Final Claims Status and in Support of Plaintiffs' Supplemental Brief Re Costs Incurred by Settlement Administrator ("Chiango Decl.") at ¶¶ 6, 8-12 (filed concurrently). As a result, RG/2 Claims has more data regarding its incurred costs and estimated future costs to act as settlement administrator. *Id.* at ¶¶ 6-7. RG/2 Claims has provided an itemized cost breakdown for the requested amount which shows that RG/2 Claims has incurred $36,973.95 in costs to date and estimates additional costs at $22,425.05 to perform distribution and post-distribution services. *Id.* at ¶ 7, Ex. A. If the actual figure proves to be lower, the difference will revert to the settlement fund for distribution to the Class. *See* Dkt. 85-1, Settlement Agreement at Sec. VIII.6.

The reason for the original discrepancy between the $76,581.40 or the $76,306 figures cited in Plaintiffs' Motion was that the $76,306 figure reflected RG/2 Claims original cost estimate to act as administrator in this matter. *Id.* at ¶ 3. Subsequently, during the notice administration process, Class Counsel elected to do searches through Lexis/Nexis Accurint and TLO to obtain either a better email address or a mailing address for anyone who RG/2 Claims did not have a valid mailing address for. *Id.* at ¶ 4. The $275.40 cost to perform these ultimately successful searches was not included in RG/2 Claims' initial estimate. The $76,581.40 estimate included that additional cost ($76,306 + $275.40). *Id.* at ¶¶ 4-5.

Plaintiffs now request an amount up to **$59,399** for Settlement Administrator reimbursement. Class Counsel apologizes for any confusion it has caused the Court. An amended [Proposed] Order has been submitted herewith.

DATED: October 28, 2026

Respectfully submitted,

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