

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT
HARTFORD DIVISION**

Beth Andrew-Berry, individually and as a representative of the GWA, LLC 401(k) Profit Sharing Plan and a class of similarly situated persons,

Plaintiffs,

v.

George A. Weiss and GWA, LLC,

Defendants.

Case No. 3:23-CV-00978-OAW

August 22, 2025

**DECLARATION OF JEFF MITCHELL IN FURTHER SUPPORT OF
PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT
AND PLAINTIFF'S MOTION FOR ATTORNEYS' FEES, EXPENSE
REIMBURSEMENTS, AND CLASS REPRESENTATIVE SERVICE AWARD**

I, Jeff Mitchell, declare as follows:

1. I am currently a Project Manager for Analytics Consulting, LLC (hereinafter, "Analytics"), located at 18675 Lake Drive East in Chanhassen, Minnesota. Analytics provides consulting services for the design and administration of class action and mass tort litigation settlements and notice programs. Over the past twenty-six years, Analytics has managed settlements ranging from fewer than 100 class members to more than 40 million, including some of the largest and most complex notice and claims administration programs in history.

2. In my capacity as Project Manager, I have responsibility for matters relating to settlement administration in the above-captioned litigation.

3. Analytics has been engaged in this matter to provide settlement administration services, including (among other things) the mailing of the CAFA Notice and Court-approved

Notice of Settlement, the establishment and maintenance of a Settlement Website and telephone call center facility, review and response to emails from Class Members, and the distribution of settlement benefits to Class Members (following final approval).¹

4. The Court approved Analytics as the Settlement Administrator in this matter in its Order on Plaintiff's Motion for Preliminary Approval of Settlement (hereinafter, "Preliminary Approval Order"). ECF No. 59.

Class Member Response

5. As of the date of this Declaration, Analytics received 43 calls to the telephone support line, 16 emails, and 1 communication via U.S. mail regarding the Settlement.

6. I am only aware of one objection to the Settlement, to attorneys' fees, from Richard Lessard, which Class Counsel forwarded to me. I am not aware of any other objections to the Settlement (including proposed attorneys' fees, expense reimbursements, and the class representative service award).

7. Analytics received 123 "rollover requests" from Class Members to deposit their settlement proceeds in a qualified retirement account.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: August 22, 2025

Respectfully submitted,

DocuSigned by:

13EC110C92464EC...

Jeff Mitchell

Analytics Consulting, LLC

18675 Lake Drive East

Chanhassen, Minnesota 55347

¹ Unless otherwise noted, all capitalized terms referenced herein have the meaning ascribed to them in the Parties' Settlement Agreement (ECF No. 52-1).