

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL  
SERVICES PROGRAM, NATIONAL  
CONSUMER LAW CENTER, and  
ALLIANCE FOR JUSTICE, for themselves  
and all others similarly situated,

*Plaintiffs,*

v.

UNITED STATES OF AMERICA,  
*Defendant.*

Case No. 1:16-cv-00745-PLF

**DECLARATION OF GIO SANTIAGO REGARDING SETTLEMENT  
ADMINISTRATION COSTS**

I, Gio Santiago, declare as follows:

1. My name is Gio Santiago. I have personal knowledge of the matters set forth herein.
2. I am a Senior Project Manager of Client Services at KCC Class Action Services, LLC (“KCC”).
3. This declaration provides information regarding the anticipated costs of the administration of the Settlement Notice Plan. Details regarding the Settlement Notice Program were provided to the Court in the Declaration of Christie. K. Reed Regarding Notice Procedures (ECF# 141-4, filed on October 11, 2022), the Supplemental Declaration of Christie. K. Reed Regarding Revised Notice Procedures (ECF# 149-5, filed on March 12, 2023), and the Declaration of Gio Santiago Regarding Implementation of Settlement Notice Program (ECF# 158-7, filed on August 28, 2023).
4. Due to unforeseen complexities and complications, some of which were detailed in my prior declaration, KCC has revised our previously provided not-to-exceed estimate of

\$1,002,000. Given that the estimate is a “not to exceed” amount, we estimate the cost to complete the administration to be \$1,128,687.

I, Gio Santiago, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed this 2<sup>nd</sup> day of October 2023.

A handwritten signature in black ink, appearing to read 'Gio Santiago', written over a horizontal line.

Gio Santiago