

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

GREGORY YOUNG, et al.,

Plaintiffs,

v.

WELLS FARGO & CO., and
WELLS FARGO BANK, N.A.,

Defendants.

Case No. 4:08-cv-00507-RP-CFB

**SUPPLEMENTAL DECLARATION
REGARDING REQUESTS FOR
EXCLUSION AND OBJECTIONS
RECEIVED**

I, LORI L. CASTANEDA, declare and state as follows:

1. I am a Vice President of Operations at Garden City Group, LLC (“GCG”). The following statements are based on my personal knowledge and information provided by other experienced GCG employees working under my supervision and, if called on to do so, I could and would be competent to testify thereto.

2. This Declaration has been prepared and executed to supplement and update Jennifer M. Keough’s Declaration, filed on December 8, 2015 (ECF No. 264-1).

3. In accordance with Paragraph 10 of the Preliminary Approval Order, any Class Member who wished to be excluded from the Class was required to do so in writing so that the request was postmarked by December 22, 2015. As previously reported, as of December 7, 2015, GCG had received 102 requests for exclusion. As of the date of this Declaration, GCG has

received 214 timely requests for exclusion.¹ When compared against the unique loan identification numbers provided in the Notice Database, the timely requests for exclusion represent 181 unique loans with qualifying property inspection fee transactions. As of the date of this Declaration, GCG has also received five requests for exclusion which were postmarked after the December 22, 2015, deadline. The requests for exclusion postmarked after December 22, 2015, represent four unique loans with qualifying property inspection fee transactions. A summary list of those Persons requesting exclusion is attached hereto as Supplemental Exhibit A.

4. Paragraph 11 of the Preliminary Approval Order provided that Class Members who wished to object to the Settlement must have done so in writing so that the objection was received by the Parties and filed with the Court no later than December 22, 2015. As previously reported, as of December 7, 2015, GCG was aware of four objections from Class Members. As of the date of this Declaration, GCG is aware of objections from 13 Class Members.

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

Executed this 14th day of January, 2016, in Seattle, Washington.


LORI L. CASTANEDA

¹ This statistic includes requests from Persons not identified as Class Members in the Notice Database, qualifying loans which are held by more than one Person, and Persons who have more than one qualifying loan. As appropriate, each exclusion request was connected with one or more unique GCG ID number; the 219 GCG ID numbers associated with each exclusion request are identified in the 'GCG ID #' column of Supplemental Exhibit A. For the convenience of the Court and the parties in the Action, Supplemental Exhibit A has been grouped by both loan and requestor.