



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

IN RE SANTANDER CONSUMER USA  
HOLDINGS INC. STOCKHOLDERS'  
LITIGATION

CONSOLIDATED  
C.A. No. 2022-0689-LWW

**PLAINTIFFS' UNOPPOSED MOTION  
FOR CLASS DISTRIBUTION ORDER**

PLEASE TAKE NOTICE THAT lead plaintiffs The Liverpool Limited Partnership and Elliott International L.P. (together, "Lead Plaintiffs"), on behalf of themselves and all other members of the Court-certified Class and additional plaintiffs Lycoming County Employees' Retirement System and Central Laborers' Pension Fund (with Lead Plaintiffs, "Plaintiffs"), respectfully move this Court to enter the accompanying Class Distribution Order pursuant to the terms of the Stipulation and Agreement of Compromise, Settlement, and Release (the "Stipulation") (Trans. ID 74737944) and the Court's Final Order and Judgment (Trans. ID 75249508) and submits in support of this motion the accompanying Affidavit of Eric J. Miller in Support of Plaintiffs' Unopposed Motion for Class Distribution Order (the "Miller Affidavit") submitted by the Court-approved Settlement Administrator, A.B. Data, Ltd.'s Class Action Administration Company

(“A.B. Data”).<sup>1,2</sup> Lead Counsel has shared a copy of this motion with Defendants’ Counsel, and Defendants’ Counsel informed us that Defendants take no position on the motion. If approved by the Court, the Class Distribution Order will, inter alia:

1. Direct A.B. Data to distribute the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payment of A.B. Data’s fees and expenses requested in this motion, and after deducting a “reserve” for estimated taxes, the costs of preparing appropriate tax returns, escrow fees, and administrative contingencies as set forth in paragraph 10 of the Miller Affidavit (the “Distribution”).<sup>3</sup>

2. Consistent with ¶ 48 of the Court-approved Plan of Allocation stated in the Notice disseminated to Class Members, direct that each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund equal to the

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<sup>1</sup> Pursuant to the Court’s Scheduling Order (Trans. ID 74774603), the Court authorized A.B. Data to act as the Settlement Administrator in connection with the Settlement of this Action.

<sup>2</sup> Plaintiffs incorporates by reference the definitions in the Stipulation and the Miller Affidavit, and all capitalized terms used herein shall have the same meanings as set forth in the Stipulation and/or the Miller Affidavit.

<sup>3</sup> After the Court’s December 17, 2024 Final Order and Judgment, which awarded the reimbursement of about \$4.4 million in litigation expenses, Lead Counsel learned that it was overcharged by \$8,650.79 for court-reporting services. After reversing this charge with its vendor, Lead Counsel transferred this amount to the settlement distribution account, effectively reducing the expense reimbursement and increasing the Net Settlement Fund by \$8,650.79. Lead Counsel are available to answer any questions the Court might have.

product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the “Per-Share Recovery,” which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares held by all Eligible Class Members. (Miller Affidavit ¶ 10(a)).

3. Consistent with ¶ 49 of the Plan of Allocation, payments from the Net Settlement Fund to Eligible Class Members will be made in the same manner in which Eligible Class Members received the Acquisition consideration upon the Closing of the Acquisition. Accordingly, if an Eligible Class Member’s Eligible Shares were held in “street name” and the Acquisition Consideration was paid into an Eligible Class Member’s brokerage account upon the Closing of the Acquisition, that Eligible Class Member’s broker will be responsible for depositing that Eligible Class Member’s Settlement payment into that same brokerage account. (Miller Affidavit ¶ 10(b)).

4. Consistent with ¶ 50(i) of the Court-approved Plan of Allocation, with respect to Eligible Shares held of record by the DTC, through its nominee Cede, A.B. Data shall distribute that portion of the Net Settlement Fund to be allocated to Eligible Beneficial Holders who held their Eligible Shares through DTC Participants to be paid to the DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,<sup>4</sup> subject to payment suppression instructions

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<sup>4</sup> For each DTC Participant, the “Closing Security Position” is the number of Eligible

with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. (Miller Affidavit ¶ 10(c)).<sup>5</sup> The DTC Participants and their respective customers, including any intermediaries, shall then ensure *pro rata* payment to each Eligible Beneficial Holder based on the number of Eligible Shares beneficially owned by such Eligible Beneficial Holder. (*Id.*)

5. Consistent with ¶ 50(ii) of the Court-approved Plan of Allocation, with respect to Eligible Shares held of record other than by Cede, as nominee for DTC (a “Non-Cede Record Position”), the payment with respect to each such Non-Cede Record Position will be made by A.B. Data from the Net Settlement Fund directly to the Eligible Record Holder of each Non-Cede Record Position in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Non-Cede Record Position. (Miller Affidavit ¶ 10(d)).

6. For the avoidance of doubt, to the extent that any record owner, any DTC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of SCUSA common stock entitled to payment of the Acquisition Consideration, whether

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Shares held by such DTC Participant, as reflected on the DTC Position Report. *See* Notice n5.

<sup>5</sup> After a reasonable investigation and engagement with several DTC Participants, Lead Counsel and Defendants’ Counsel were unable to locate a former account associated with 3,147 Excluded Shares of Edith Holiday. Defendants’ Counsel has conferred with Ms. Holiday, and made the representation that if she receives a check or other payment of settlement funds, she will void or cancel the payment.

through permitting naked short-selling or the cash settlement of short positions or through any other means (“Increased Acquisition Consideration Entitlements”), such record owner, DTC Participants, or their respective customers (including intermediaries) will be responsible for paying to the ultimate beneficial owners of such Increased Acquisition Consideration Entitlements an amount equal to the Per-Share Recovery times the number of the Increased Acquisition Consideration Entitlements. Whether DTC, any DTC Participant, or DTC Participants’ customers are entitled to receive such funds from any such short-seller is not before this Court (Miller Affidavit ¶ 10(e)).

7. Consistent with ¶ 50(iii) of the Court-approved Plan of Allocation, for the avoidance of doubt, person or entity who purchased Eligible Shares but had not settled those Eligible Shares before the Closing of the Acquisition on January 31, 2022 (“Non-Settled Shares”) *shall be* treated as an Eligible Class Member with respect to those Non-Settled Shares, and a person or entity who sold those Non-Settled Shares before the closing of the Acquisition on January 31, 2022 *shall not be* treated as an Eligible Class Member with respect to those Non-Settled Shares. (Miller Affidavit ¶ 10(f)).

8. Consistent with ¶ 50(iv) of the Court-approved Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (*i.e.*, more than six months from the

check's issue date) or if there is a remaining balance in the Net Settlement Fund for any other reason, such balance shall be redistributed to identifiable Class Members in accordance with the Plan of Allocation or, if Lead Counsel, in consultation with the Settlement Administrator, determines that redistribution would not be cost-effective, transferred to the Combined Campaign for Justice. (Miller Affidavit ¶ 10(g)).

9. Following the distribution of the Net Settlement Fund to DTC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares. (Miller Affidavit ¶ 10(h)).

10. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all Distribution checks will bear a notation "CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE]." (Miller Affidavit ¶ 10(i)).

11. Authorize the destruction of paper copies of all supporting documentation one year after the distribution of the Net Settlement Fund, and the destruction of electronic copies of the same one year of documentation after all funds in the Net Settlement Fund have been distributed. (Miller Affidavit ¶ 10(j)).

12. Direct that payment pursuant to the Class Distribution Order shall be final and conclusive against all Eligible Class Members, and release and discharge all Persons involved in the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund, from any and all claims arising out of such involvement, and bar all Class Members, whether or not they receive payment from the Net Settlement Fund, from making any further claims against the Net Settlement Fund, Plaintiffs, Lead Counsel, the Settlement Administrator (A.B. Data), or any other agent retained by Plaintiffs or Lead Counsel in connection with the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund beyond the amounts allocated to Eligible Class Members.

13. Approve all of A.B. Data's fees and expenses incurred in connection with the administration of the Settlement and estimated to be incurred in connection with the distribution of the Net Settlement Fund as set forth in Exhibit A to the Miller Affidavit and authorize Lead Counsel to direct payment out of the Settlement Fund to A.B. Data in payment of any such outstanding fees and expenses.

14. Retain jurisdiction to consider any further applications concerning the administration of the Settlement, and such other and further relief as the Court deems appropriate.

Dated: January 23, 2025

OF COUNSEL:

Jeroen van Kwawegen  
Edward Timlin

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*/s/ Andrew E. Blumberg*

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*Attorneys for Plaintiffs The Liverpool  
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International L.P.*

**WORDS: 1,568 (of 3,000 Word Limit)**



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

IN RE SANTANDER CONSUMER USA  
HOLDINGS INC. STOCKHOLDERS'  
LITIGATION

CONSOLIDATED  
C.A. No. 2022-0689-LWW

**[PROPOSED] CLASS DISTRIBUTION ORDER**

The Court, having considered Plaintiffs' Unopposed Motion for Class Distribution Order (the "Motion"), and for good cause shown, IT IS HEREBY ORDERED that:

1. The Motion is GRANTED.
2. The Settlement Administrator shall implement the proposed Plan of Distribution as described in the Motion.

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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Vice Chancellor Lori W. Will



the Summary Notice; and (C) Establishment of Tel[e]phone Helpline and Settlement Website” (Trans. ID 75185453), as the Settlement Administrator, A.B. Data has implemented the terms of the Settlement by, among other things: (i) mailing the Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear (the “Notice”) to potential Class Members; (ii) causing the publication of the Summary Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear in *The Wall Street Journal* and over the *PR Newswire*; (iii) creating and continuing to maintain a toll-free telephone helpline and a Settlement website to assist Class Members during the course of the administration; and (iv) administering the Settlement in accordance with the terms of the Stipulation.

3. On December 17, 2024, the Court entered the Final Order and Judgment (the “Final Approval Order”) (Trans. ID 75249508), granting final approval of the Settlement and the proposed plan of allocation of the Net Settlement Fund set forth in the Notice (the “Plan of Allocation”). I submit this Affidavit in support of Plaintiffs’ motion for a Class Distribution Order, which will, among other things, approve the proposed plan for the distribution of the Net Settlement Fund to Eligible Class Members in accordance with the terms of the Settlement and the Court-approved Plan of Allocation. *See* Notice ¶ 44. The following statements are based on my personal knowledge and information provided by A.B. Data employees working

under my supervision, and if called on to do so, I could and would testify competently thereto.

### **ACQUISITION RECORDS**

4. Pursuant to the terms of the Court-approved Plan of Allocation, the Net Settlement Fund will be distributed to all Eligible Class Members—*i.e.*, all former holders of Santander Consumer USA Holdings Inc. (“SCUSA”) common stock as of the January 31, 2022 closing (the “Closing”) of the acquisition (the “Acquisition”) by Santander Holdings USA, Inc. and who received \$41.50 per share in cash in exchange for their shares of SCUSA common stock in connection with the Acquisition, whether beneficial or of record, including as necessary for relief the legal representatives, heirs, successors-in-interest, transferees, and assignees of all such foregoing holders.<sup>2</sup> In accordance with terms of the Stipulation, the Eligible Class Members do not include any of the Excluded Stockholders. *See* Notice ¶ 44; *see also* Stipulation ¶1(d).

5. Under the terms of the Plan of the Allocation, Eligible Class Members were not required to submit a claim form to receive a distribution from the Settlement. *See* Notice ¶ 40. Instead, distributions from the Net Settlement Fund will

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<sup>2</sup> Eligible Class Members include stockholders who tendered their shares directly to Santander Holdings USA Inc. for \$41.50 per share in cash.

be paid to Eligible Class Members based upon the Acquisition Records provided to A.B. Data by Defendants and Cede & Co. (“Cede”). *See id.* ¶¶ 49-50.

6. On October 8, 2024, A.B. Data received from Defendants a copy of the “Registered Holders List” identifying all registered holders of SCUSA common stock who held shares of SCUSA common stock as of the Closing, *i.e.*, January 31, 2022 (“Registered Holders”). The Registered Holders List contains the names, addresses, and number of shares held by each of the Registered Holders. The Registered Holders List identified 60 Registered Holders holding a total of 245,864,284.47602 (“non-Cede”) shares of SCUSA common stock outstanding at the Closing, including 245,672,132 non-Cede Excluded Shares described in paragraph 8 below. A.B. Data identified 192,152.47602 non-Cede Eligible Shares (the “Eligible Record Holders”).

7. On December 11, 2024, A.B. Data received from Cede the “DTC Allocation Reports” (and with the “Registered Holders List,” the “Acquisition Records”), showing each DTC Participant’s holdings of SCUSA common stock at the Closing. A.B. Data consulted with DTC to confirm the accuracy of the number of shares held of record by Cede (as nominee for DTC) identified in the DTC Allocation Reports. The DTC Allocation Reports contain each DTC Participant’s name, identification number, and the number of shares held by the DTC Participant. The DTC Allocation Reports identified 124 DTC Participants holding a total of

60,303,585 shares of SCUSA common stock. Accounting for the 180,116 Cede Excluded Shares described in paragraph 8 below, the total number of Eligible Shares held by the ultimate beneficial owner(s) of any Eligible Shares held of record by Cede (“Eligible Beneficial Holders”) (60,123,469) added to the total number of Eligible Shares held by Eligible Record Holders (192,152.47602) calculates to 60,315,621.47602 total Eligible Shares.

8. Consistent with the terms of the Settlement, Defendants’ Counsel provided A.B. Data with information concerning the stockholdings of the identified Excluded Stockholders. This information indicated a total of 245,852,248 Excluded Shares reflected in the Record Holder List (245,672,132) and DTC Allocation Reports (180,116). The total Excluded Shares include 245,593,555 shares held by Santander Holdings USA Inc.

**SETTLEMENT ADMINISTRATION FEES AND DISBURSEMENTS**

9. A.B. Data agreed to be the Settlement Administrator in exchange for payment of its fees and expenses. Lead Counsel received regular reports of all the work A.B. Data performed with respect to the administration of the Settlement and authorized the administration work performed herein. Attached hereto as Exhibit A are invoices of A.B. Data’s total fees and expenses for this matter through December 31, 2024 (\$80,300.86), and A.B. Data’s estimate of fees and expenses to conduct the initial distribution of the Net Settlement Fund in accordance with the “Distribution

Plan” described below (\$22,322.25). To date, A.B. Data has not been paid for its fees and expenses. Accordingly, there is an outstanding balance of \$102,623.11 payable to A.B. Data, which amount includes A.B. Data’s anticipated fees and expenses for the initial distribution.

**DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND**

10. A.B. Data will distribute the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payments approved by the Court on this motion, and after deducting a “reserve” for estimated taxes, the costs of preparing appropriate tax returns, escrow fees, and administrative contingencies (the “Distribution”),<sup>3</sup> as follows:

- a. Consistent with ¶ 48 of the Court-approved Plan of Allocation, each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund in connection with the Distribution equal to the product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the “Per-Share Recovery” for the Settlement, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares held by all Eligible Class Members. Based upon the total

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<sup>3</sup> 95% of the Net Settlement Fund will be distributed immediately, and 5% will be held in reserve for taxes, tax returns, escrow fees, and administrative contingencies. The funds available from the reserve will be distributed approximately 9 months after the initial distribution.

number of identified Eligible Shares and the estimated total Net Settlement Fund, the estimated total Per-Share Recovery is \$2.29 per Eligible Share.<sup>4</sup>

b. Consistent with ¶ 49 of the Plan of Allocation, payments from the Net Settlement Fund to Eligible Class Members will be made in the same manner in which Eligible Class Members received the Acquisition Consideration upon the Closing of the Acquisition. Accordingly, if an Eligible Class Member's Eligible Shares were held in "street name" and the Acquisition Consideration was paid into an Eligible Class Member's brokerage account upon the Closing of the Acquisition, that Eligible Class Member's broker will be responsible for depositing that Eligible Class Member's Settlement payment into that same brokerage account.

c. Consistent with ¶ 50(i) of the Plan of Allocation, with respect to Eligible Shares held of record by the DTC, through its nominee Cede, A.B. Data will cause that portion of the Net Settlement Fund to be allocated to Eligible Beneficial Holders who held their Eligible Shares through DTC Participants to be paid to the DTC Participants by paying each the Per-Share

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<sup>4</sup> Based on the estimated Net Settlement Fund available for the initial distribution, the estimated Per-Share Recovery for the initial distribution is \$2.18 per Eligible Share.



Recovery times its respective Closing Security Position,<sup>5</sup> subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. The DTC Participants and their respective customers, including any intermediaries, shall then ensure *pro rata* payment to each Eligible Beneficial Holder based on the number of Eligible Shares beneficially owned by such Eligible Beneficial Holder.

d. Consistent with ¶ 50(ii) of the Plan of Allocation, with respect to Eligible Shares held of record other than by Cede, as nominee for DTC (a “Non-Cede Record Position”), the payment with respect to each such Non-Cede Record Position will be made by A.B. Data from the Net Settlement Fund directly to the Eligible Record Holder of each Non-Cede Record Position in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Non-Cede Record Position.

e. For the avoidance of doubt, to the extent that any record owner, any DTC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of SCUSA common stock entitled to payment of the Acquisition Consideration, whether through permitting naked short-selling or

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<sup>5</sup> For each DTC Participant, the “Closing Security Position” is the number of Eligible Shares held by such DTC Participant, as reflected on the DTC Position Report. *See* Notice n.5.

the cash settlement of short positions or through any other means (“Increased Acquisition Consideration Entitlements”), such record owner, DTC Participants, or their respective customers (including intermediaries) will be responsible for paying to the ultimate beneficial owners of such Increased Acquisition Consideration Entitlements an amount equal to the Per-Share Recovery times the number of the Increased Acquisition Consideration Entitlements. Whether DTC, any DTC Participant, or DTC Participants’ customers are entitled to receive such funds from any such short-seller is not before this Court.

f. Consistent with ¶ 50(iii) of the Plan of Allocation, for the avoidance of doubt, a person or entity who purchased Eligible Shares but had not settled those Eligible Shares before the Closing of the Acquisition on January 31, 2022 (“Non-Settled Shares”) *shall be* treated as an Eligible Class Member with respect to those Non-Settled Shares, and a person or entity who sold those Non-Settled Shares before the closing of the Acquisition on January 31, 2022 *shall not be* treated as an Eligible Class Member with respect to those Non-Settled Shares.

g. Consistent with ¶ 50(iv) of the Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (*i.e.*, more than six months from

the check's issue date) or if there is a remaining balance in the Net Settlement Fund for any other reason, such balance shall be redistributed to identifiable Class Members in accordance with the Plan of Allocation or, if Lead Counsel, in consultation with the Settlement Administrator, determines that redistribution would not be cost-effective, transferred to the Combined Campaign for Justice.

h. Following the distribution of the Net Settlement Fund to DTC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares.

i. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all Distribution checks will bear a notation "CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE]."


j. Paper copies of all supporting documentation may be destroyed one year after the distribution of the Net Settlement Fund, and electronic copies of the same may be destroyed one year after all funds in the Net Settlement Fund have been distributed.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed this 23<sup>rd</sup> day of January, 2025.

*Eric Miller*

ERIC J. MILLER

Sworn to and subscribed before me  
this 23 day of January, 2025.

  
\_\_\_\_\_  
Notary Public

Noah Fenner  
Online Notary Public  
Wisconsin  
Milwaukee  
Commission #: 249319  
Commission Expires: 2026-08-29

Notarized online using audio-video communication

My commission expires August 29, 2026.

Personally Known or Produced Identification.

Type of Identification Produced: I.D.

# EXHIBIT A



**SANTANDER CONSUMER USA HOLDINGS**

<b>Invoice Date</b>	<b>Invoice Number</b>	<b>Amount</b>
November 15, 2024	307385	\$51,382.69
December 15, 2024	307530	\$20,337.60
January 15, 2025	307649	\$8,580.57
Estimate to Complete (Initial Distribution)		\$22,322.25
<b>Total</b>		<b>\$102,623.11</b>

**A.B. DATA, LTD.**  
**Class Action Administration**  
 600 A. B. Data Drive  
 Milwaukee, WI 53217  
 414-961-7523  
 accounting@abdataclassaction.com  
 abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &  
 GROSSMANN LLP  
 1251 AVENUE OF THE AMERICAS, 44TH  
 FLOOR  
 NEW YORK, NY, 10020  
 USA

**INVOICE #:** INV000307385  
**INVOICE DATE:** 11/15/2024  
**CLIENT:** 107250  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54890 Santander Consumer USA Holdings**

DESCRIPTION	QTY	PRICE	AMOUNT
Project/Database Setup (One-Time Fee)	1	5,000.00	\$5,000.00
Website Setup and Design (One-Time Fee)	1	2,000.00	\$2,000.00
Toll-Free Telephone Line Setup (One-Time Fee)	1	1,250.00	\$1,250.00
Project Management (Hourly)	13.80	185.00	\$2,553.00
Executive Project Management	7.04	240.00	\$1,689.60
Quality Assurance (Hourly)	0.45	170.00	\$76.50
Staff (Hourly)	17.37	110.00	\$1,910.70
Printing and Mailing of Notice	10,000	0.7424	\$7,424.00
Postage	1	3,312.73	\$3,312.73
Media Notice - The Wall Street Journal	1	19,868.66	\$19,868.66
Media Notice - Press Release Disseminated via PR Newswire	1	4,200.00	\$4,200.00
Website Maintenance/Hosting (Monthly)	1	200.00	\$200.00
Interactive Voice Response (IVR) (Per Minute)	8	0.50	\$4.00
CSRs/Live Operators (Per Hour)	2.18	75.00	\$163.50
800 Number Charges (Per Minute)	300	0.15	\$45.00
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Bank/Broker/Nominee Fulfillment Expenses	1	85.00	\$85.00
Receipt and Processing of Bank/Broker/Nominee Lists for Mail	7	185.00	\$1,295.00
Market Research Fee	1	100.00	\$100.00

**TOTAL \$51,382.69**

**MAIL CHECKS TO**  
 PO Box 170062, Milwaukee, WI 53217  
 Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**  
 US BANK, N.A.  
 400 W. Brown Deer Road, Bayside, WI 53217  
 Routing Number 075000022  
 Account Number 182377466541 (AB Data, Ltd.)  
 Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

**A.B. DATA, LTD.**

**Class Action Administration**

600 A. B. Data Drive  
Milwaukee, WI 53217  
414-961-7523  
billing@abdata.com  
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP  
1251 AVENUE OF THE AMERICAS, 44TH  
FLOOR  
NEW YORK, NY, 10020  
USA

**INVOICE #:** INV000307530  
**INVOICE DATE:** 12/15/2024  
**PERIOD ENDING:** 11/30/2024  
**CLIENT:** 107250  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54890 Santander Consumer USA Holdings**

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	10	0.25	\$2.50
Call Center Notice Requests	1	2.5000	\$2.50
Project Management (Hourly)	15.50	185.00	\$2,867.50
Executive Project Management (Hourly)	3.28	240.00	\$787.20
System Support (Hourly)	0.89	195.00	\$173.55
Staff (Hourly)	2.33	110.00	\$256.30
Reprint of 16 Page Notice	3,000	2.5384	\$7,615.20
Postage	1	0.69	\$0.69
Website Maintenance/Hosting (Monthly)	1	200.00	\$200.00
CSRs/Live Operators (Per Hour)	3.92	75.00	\$294.00
800 Number Charges (Per Minute)	13	0.15	\$1.95
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Advanced Address Updates	14	0.50	\$7.00
Bank/Broker/Nominee Fulfillment Expenses	1	7,924.21	\$7,924.21

**TOTAL \$20,337.60**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge



**A.B. DATA, LTD.**

**Class Action Administration**

600 A. B. Data Drive  
Milwaukee, WI 53217  
414-961-7523  
billing@abdata.com  
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP  
125 AVENUE OF THE AMERICAS, 44TH  
FLOOR  
NEW YORK, NY, 10020  
USA

**INVOICE #:** INV000307649  
**INVOICE DATE:** 1/15/2025  
**PERIOD ENDING:** 12/31/2024  
**CLIENT:** 107250  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54890 Santander Consumer USA Holdings**

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	12	0.25	\$3.00
Project Management (Hourly)	23.19	185.00	\$4,290.15
Executive Project Management (Hourly)	8.75	240.00	\$2,100.00
System Support (Hourly)	6.89	195.00	\$1,343.55
Staff (Hourly)	2.26	110.00	\$248.60
Website Maintenance/Support (Monthly)	1	200.00	\$200.00
800 Number Charges (Per Minute)	1	0.15	\$0.15
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Bank/Broker/Nominee Fulfillment Expenses	1	145.67	\$145.67
Electronic Storage	1	44.45	\$44.45

**TOTAL \$8,580.57**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge



People Doing Business With People

Talent. Technology. Experience.

Date: January 22, 2025  
Project: Santander

A.B. Data, Ltd. | Class Action Administration Company  
600 A.B. Data Drive | Milwaukee, WI 53217

**Distribution Estimate - Project Fees**

	Quantity	Rate (\$)	Estimated Cost (\$)
Executive Project Management	12	240	2,880
Project Management	30	165	4,950
System Support	8	175	1,400
Staff	25	95	2,375
Subtotal Professional Fees			\$ 11,605

**Distribution Estimate - Project Expenses**

	Quantity	Rate (\$)	Estimated Cost (\$)
<b>Contact Center Support</b>			
Interactive Voice Response (IVR) ( <i>per minute</i> )	100	0.48	48
800 Number Charges ( <i>per minute</i> )	200	0.14	28
CSRs/Live Operators/Correspondence Processing ( <i>per hour</i> )	50	55	2,750
IVR and Line Maintenance ( <i>monthly</i> )	9	195	1,755
Website Maintenance/Hosting ( <i>monthly</i> )	9	175	1,575
<b>Distribution</b>			
Distribution Setup	1	1,500	1,500
Print and Mail Checks	1	2,000	2,000
Postage	1	500	500
Check Processing Fees	225	0.15	34
Advanced Address Updates	25	1.10	28
Miscellaneous Expenses (data storage etc.)	1	500	500
Subtotal Project Expenses			\$ 10,717.25
Total Fees and Expenses			\$ 22,322.25