IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

IN RE: SMITTY'S/CAM2 303 TRACTOR HYDRAULIC FLUID MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 2936 Master Case No. 4:20-MD-02936-SRB
This document relates to: All Class Actions	

DECLARATION OF SETTLEMENT ADMINISTRATOR

I, Tina Chiango, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the Director of Claims Administration, Securities, and Antitrust for RG/2 Claims Administration LLC ("RG/2"), the Settlement Administrator retained in this matter, located at 30 S. 17th Street, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. RG/2 was retained by the parties and approved by the Court to serve as Settlement Administrator, which includes amongst other tasks, disseminating notice to the class via first class mail or email; contracting and overseeing published notice; receiving and tracking requests for exclusion and objections; responding to Class Member inquiries; processing Claim Forms and evaluating Claims; calculating, preparing and mailing Settlement Award checks to all Eligible Settlement Class Members; and any additional tasks as the parties mutually agree upon or the Court orders RG/2 to perform.

3. The claims review and evaluation process has now been completed, and below if a summary of that process.

4. Claimants submitted 6,636 Claim Forms in this Manufacturer Settlement as follows:

a. 2,340 Claim Forms were submitted online which adopted the prior claims submitted and/or the purchase data from the Retailer Settlement;

b. 1,313 Claim Forms were submitted in paper format which adopted the prior claims submitted and/or the purchase data from the Retailer Settlement;

c. 483 Claim Forms were submitted online which added to the claims previously submitted in the Retailer Settlement;

d. 420 Claim Forms were submitted in paper format which added to the claims previously submitted in the Retailer Settlement;

e. 1,842 new Claim Forms were submitted online by claimants who had not previously submitted claims in the Retailer Settlement; and,

f. 238 new Claim Forms were submitted in paper format by claimants who had not previously submitted claims in the Retailer Settlement.

These totals do not include more than 300,000 portal claims flagged as likely fraudulent based on IP address, repeat filings, and other factors.

5. These 6,636 Claim Forms were reviewed and evaluated for validity based on objective factors. After the initial evaluation and review, 1,395 Claims Forms were determined to be not valid and 354 Claim Forms were determined to be not valid in part. In addition, as noted

above, more than 300,000 additional portal Claim Forms were determined to be not valid and likely fraudulent.

6. RG/2 forwarded emails or letters to those Claimants whose Claim Forms were denied and/or partially denied. The communications set forth the basis of the denial/partial denial and advised the Claimants that they had 21 days to contest the denial. 29 Claimants contested the full denials of their Claim Forms, and 12 of those denials were switched to valid or partially valid based on those contests. 15 Claimants contested the partial denial of their Claim Form, and 8 of those were reevaluated based on the contest.

7. All totaled, 5,241 Claim Forms were determined to be valid or partially valid.

8. The valid Claim Forms have been determined to be valid for the following specific numbers of the various unit sizes:

2,297	Two-Gallon Jugs
132,164	Five-Gallon Buckets
156	55-Gallon Drums

9. 2,502 of the valid Claim Forms also included valid equipment parts/repair/damage claims for a valid total amount of $38,842,542.45 in parts/repair damages and total loss equipment damages.

10. The net settlement amount for distribution to Class Members from this settlement with the Manufacturer Defendants is $16,664,479.47.

11. Applying the settlement values to the total number of valid purchases from Claim Forms, the total number of units and settlement values are as follows

Unit Size	Total Number	Total Value
2-Gallon Jug	2,297	$13,782
5-Gallon Bucket	132,164	$1,585,968
55-Gallon Drum	156	$14,040

The total of all Class Members' Damage Claim Value related to purchases is thus $1,613,790.

12. Adding the total Damage Claim Value related to purchases of $1,613,790 and the Repairs/Parts/Specific Damage Value of $38,842,542.45, the Total Claim Value for all Settlement Class Members is $40,456,332.45.

13. Paying Class Member's valid claims at a pro rata percentage of 40% would expend $16,182,532.98 of the net settlement amount and would leave a contingency of $481,946.49.

Dated: June 30, 2025

Tina Chiango