

Exhibit 1

UNIVERSAL INSURANCE LITIGATION

TIME REPORT

FIRM NAME: Kaplan Fox & Kilsheimer LLP

REPORTING PERIOD: Inception through April 30, 2017

NAME	TOTAL HOURS	HOURLY RATE	LODESTAR
FS Fox (P)	115.70	\$ 900	\$ 104,130.00
LD King (P)	84.20	\$ 810	\$ 68,202.00
D Straite (P)	644.20	\$ 655	\$ 421,951.00
M George (OC)	1.00	\$ 635	\$ 635.00
R Labaton (A)	147.70	\$ 250	\$ 36,925.00
KM Cosgrove (I)	10.00	\$ 310	\$ 3,100.00
M Moonsammy (PL)	7.00	\$ 310	\$ 2,170.00
W Gomes (PL)	<u>43.00</u>	\$ 270	<u>\$ 11,610.00</u>
TOTALS	1,052.80		\$ 648,723.00

Exhibit 2

UNIVERSAL INSURANCE LITIGATION

EXPENSE REPORT

FIRM NAME: Kaplan Fox & Kilsheimer LLP

REPORTING PERIOD: Inception through April 30, 2017

CATEGORY		CUMULATIVE EXPENSES
Air Express/Postage/Messengers	\$	577.49
Mediation Fees - Jams	\$	7,692.12
Transcripts	\$	1,041.85
Photocopies - In-House	\$	615.80
On-Line Research	\$	7,305.92
Travel/Meeting Exps.	\$	<u>1,867.53</u>
TOTALS	\$	19,100.71

Exhibit 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Karen RODRIGUEZ, et al., individually and
on behalf of other similarly situated persons,

Plaintiffs,

v.

UNIVERSAL PROPERTY & CASUALTY
INSURANCE COMPANY,

Defendants.

Case No.: 16-cv-60442-COHN/SELTZER

**DECLARATION OF MARC WITES IN
SUPPORT OF MOTION FOR
ATTORNEYS' FEES, EXPENSES AND
CLASS REPRESENTATIVE INCENTIVE
AWARDS**

I, Marc Wites, declare and state, under penalty of perjury, that the following is true and correct to the best of my knowledge, information and belief:

1. I am a partner and co-founder of the law firm of Wites & Kapetan, P.A. in Lighthouse Point (“Wites & Kapetan” or “Liaison Counsel”), Court-appointed Liaison Class Counsel for the Settlement Class. I am admitted to practice before this Court.
2. My firm, at the direction of Lead Counsel Kaplan Fox & Kilsheimer LLP (collectively, “Class Counsel”), has prosecuted this litigation on a fully contingent basis since its inception. I have personal knowledge of the matters set forth herein based on my active participation in and supervision of my firm’s contribution to the prosecution and settlement of this litigation, and, if called as a witness, could and would testify competently thereto.
3. I submit this Declaration in support of plaintiffs’ motion, pursuant to Rule 23(h), for fees, expenses and Class Representative Service Awards (the “Motion”).
4. I authorize Lead Counsel to append this Declaration to the Declaration of David A. Straite accompanying the Motion.

5. My primary contact at Lead Class Counsel is David Straite, and he and I conferred regularly to eliminate duplication of efforts and to ensure efficient staffing of projects.

6. I contributed 50.1 hours of time to this matter since inception. This figure was prepared from contemporaneous time records prepared by the firm in the ordinary course, which I can provide to the Court in camera or publicly via ECF (in redacted form) if requested by the Court. My hourly rate is \$650 per hour, set in accordance with my experience, training, and skill and in accordance with known rates at other firms performing similar work. My total lodestar is thus \$32,565.00.

7. My firm also incurred \$745.00 in actual, unreimbursed expenses related to prosecuting this action. This figures consists of \$400.00 in court filing fees and an additional \$345 in service of process fees and fees associated with motions for admission *pro hac vice* for Lead Counsel. I believe these expenses were necessary and reasonable.

8. The expenses incurred in this action are reflected on the books and records of the firm, and are prepared from expense vouchers, check records and other source materials, and represent an accurate record of the expenses incurred. I can provide backup invoices in camera or publicly via ECF (in redacted form) if requested by the Court.

9. With respect to reimbursement for expenses incurred to outside vendors, the amounts requested reflect the actual amounts billed by the providers without any mark-up.

10. From case inception, I was aware that I might not recover any of my expenses, and, at the very least, would not recover any out-of-pocket expenses until the Action was successfully resolved. Thus, I was motivated to, and did, take significant steps to minimize expenses whenever practicable without jeopardizing the vigorous and efficient prosecution of the case.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: May 15, 2017

Respectfully submitted,

WITES & KAPETAN P.A.

/s/ Marc Wites

Marc Wites
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Fax: 954-354-0205

Exhibit 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

KAREN RODRIGUEZ, *et al.*, individually and
on behalf of other similarly situated persons,

Plaintiffs,

v.

UNIVERSAL PROPERTY & CASUALTY
INSURANCE COMPANY,

Defendant.

Case No. 16-60442-CIV-COHN/SELTZER

DECLARATION OF JEREMY R. HENLEY

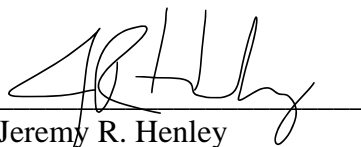
I, Jeremy R. Henley, declare under penalty of perjury, as provided for by the laws of the United States, 28 U.S.C. § 1746, that the following statements are true:

1. I am the Vice-President of Data Breach Services at ID Experts Corporation.
2. The following facts are my personal knowledge and, if called upon to do so, I could and would competently testify as follows.
3. ID Experts Corporation provides software and services to organizations for managing cyber risks and data breaches, and to consumers to protect and restore their identities from identity theft. Since 2003, ID Experts has served many of the largest healthcare, financial services, retail, higher education, and government organizations in the United States.
4. ID Experts' managed recovery and restoration service for identity theft victims provides recovery and restoration for identity theft issues such as, but not limited to, account creation, identity theft, medical record theft, account takeover, rental application, tax fraud, benefit fraud, and utility creation. This service includes a complete triage process

for affected individuals who report suspicious activity, a personally assigned IDCare Specialist to fully manage restoration of each case, and expert guidance provided for those with questions about identity theft and protective measures.

5. ID Experts' managed recovery and restoration service includes the following specific recovery services:
 - a. Preparation of a Damage Assessment Plan of the member's identity theft;
 - b. Instructions on how to file an identity theft police report;
 - c. Use of limited power of attorney to work on behalf of the victim; and
 - d. Help disputing and resolving any bills or collections resulting from fraudulent activities.
6. As of the date of this Declaration, ID Experts' managed recovery and restoration service is priced on a retail basis, per individual, at \$2.95 per month, or \$35.40 per year, or \$70.80 for two years.
7. Based on a class size of 1,391,943, the retail value of these services, if they had been purchased individually, would have been \$98,549,564. Discounted pricing is of course provided for high volume orders.
8. ID Experts' identity theft reimbursement insurance will reimburse members for expenses associated with restoring their identity should their identity is compromised. If a member's identity is compromised, the policy provides coverage for up to \$1,000,000, with no deductible, from American International Group, Inc., (AIG) an A.M. Best "A-rated" carrier. Coverage is subject to the terms, limits, and/or exclusions of the policy.
9. As of the date of this Declaration, ID Experts' identity theft reimbursement insurance is priced on a retail basis, per individual, at \$5.95 per month or \$71.40 per year.

10. Based on a class size of 1,391,943, the retail value of these services, if they had been purchased individually, would have been \$99,384,730. Discounted pricing is of course provided for high volume orders.
11. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on this 2nd day of May, 2017.



Jeremy R. Henley

Exhibit 5



Case Name:	Rodriguez v. Universal Property	
Matter (Case #):	30938	
As of:	05/08/2017	
Distribution List:		

Class Period:	09/01/13 - 03/31/2016	Total Class Size:	1,391,943
Notices Mailed:	3/15/2017	Current Claim Form Filing Rate:	n/a
Exclusion Deadline:	6/14/2017	Current Undeliverable Percentage:	
Objection Deadline:	6/14/2017	Current Exclusion Filing Rate:	0.0115%
Claim Form Deadline:	n/a		
Final Approval Hearing:	7/31/2017		

Project Notice Statistics

Period Ending:	Notices Mailed	E-mailed Notice	E-Mailed Notice Bounces	Undeliverable Notices	Forwarded Notices	Address Trace for Undeliverables	Re-mailed Notices from Trace	No New Address from Lexis	Returned second time from Lexis
03/13/2017	-	277,993	36,507	-	-	-	-	-	-
03/20/2017	665,079								
03/27/2017	-	-	-	-	-	-	-	-	-
04/03/2017	-	-	-	364	93	-	-	-	-
04/10/2017	-	-	-	3,963	571	-	-	-	-
04/17/2017	-	-	-	244	39	-	-	-	-
04/24/2017	-	-	-	-	39	-	-	-	-
05/01/2017	-	-	-	21,603	17	-	-	-	-
05/08/2017	-	-	-	899	-	-	-	-	-
Totals:	665,079	277,993	36,507	27,073	759	-	-	-	-

Project Response Statistics

Period Ending:	Objections Received (by)	Exclusions Received (by)	Paper General Correspondence	Web General Correspondence	Paper Change of Address	Web Change of Address	Request for Notice
03/13/2017	0	0	1	90	0	10	0
03/20/2017	0	7	8	76	1	3	3
03/27/2017	0	13	5	158	0	10	3
04/03/2017	0	6	59	66	0	3	0
04/10/2017	0	28	119	33	0	6	18
04/17/2017	0	9	45	23	0	4	5
04/24/2017	1	18	72	30	0	6	0
05/01/2017	0	40	19	16	5	0	73
05/08/2017	0	39	70	17	2	1	34
Totals:	1	160	398	509	8	43	136

Call Center Statistics

Period Ending:	# of IVR Calls:	IVR Time	Average IVR Call
03/13/2017	383	26:52:23	0:02:43
03/20/2017	769	166:25:10	0:04:03
03/27/2017	3,755	191:32:45	0:04:27
04/03/2017	1,199	72:37:53	0:04:14
04/10/2017	616	40:42:38	0:04:21
04/17/2017	368	24:21:36	0:04:20
04/24/2017	297	18:06:07	0:03:56



Case Name:	Rodriguez v. Universal Property	
Matter (Case #):	30938	
As of:	05/08/2017	
Distribution List:		

05/01/2017	224	16:39:33	0:04:43
05/08/2017	180	13:44:48	0:04:41
Totals:	7,791	571:02:53	0:04:10

Website Statistics start date 02/01/2017

Period Ending:	Times Website Accessed	# of Total Pages Visited	# of Long Form Notices Downloaded	# of Summary Notices Downloaded	# of Settlement Agreements Downloaded	# of My IDCare Document Downloaded
03/13/2017	3,718	5,815	96	78	538	302
03/20/2017	2,319	3,889	151	71	387	295
03/27/2017	3,497	6,010	152	18	546	414
04/03/2017	1,339	2,340	72	52	227	166
04/10/2017	732	1,257	26	17	93	75
04/17/2017	506	848	18	7	69	57
04/24/2017	492	808	22	13	53	44
05/01/2017	400	665	20	9	51	36
05/08/2017	364	616	8	5	41	21
Totals:	13,367	22,248	469	270	2,005	1,410

Comments:



Case Name:	Rodriguez v. Universal Property	
Matter (Case #):	30938	
As of:	05/08/2017	
Distribution List:		



Exhibit 6



Identity Protection Services

The MyIDCare elements have been specifically tailored to meet the needs of Universal Property & Casualty Insurance Company and and class members in the *Rodriguez v. Universal Property & Casualty Insurance Co.* (S.D. Fla.) matter.

IDENTITY THEFT INSURANCE

Identity theft insurance will reimburse policyholders for expenses associated with restoring their identity should they become a victim of identity theft. If a policyholders's identity is compromised, the policy provides coverage for up to \$1,000,000, with no deductible, from American International Group, Inc., (AIG) an A.M. Best "A-rated" carrier. Coverage is subject to the terms, limits, and/or exclusions of the policy.

Insurance coverage includes covered expenses such as:

- Up to \$7,500 per week in lost wages
- Legal fees
- Court costs
- Long distance telephone calls
- Postal charges
- Private investigators
- Notary/documentation fees

FULLY MANAGED IDENTITY RECOVERY

ID Experts' fully-managed recovery service provides recovery and restoration for identity theft issues such as (but not limited to): account creation, identity theft, medical record theft, account takeover, rental application, tax fraud, benefit fraud, and utility creation. This service includes a complete triage process for affected individuals who report suspicious activity, a personally assigned IDCare Specialist to fully manage restoration of each case, and expert guidance provided for those with questions about identity theft and protective measures.

We handle everything reasonably necessary to restore your identity. Our recovery services include:

- Experienced, certified Recovery Superheroes handle every case
- Damage Assessment Plan of the **policyholder's** identity theft
- Instructions on how to file an identity theft police report
- Use of limited power of attorney to work on behalf of the victim
- Disputing and resolving any bills or collections resulting from fraudulent activities. Institutions can include creditors, banks, lending institutions, criminal agencies, debt collection agencies, medical providers, insurance companies and others, to resolve the identity theft issues
- Post-recovery follow-up

If you do not opt out of the class and the Court approves this settlement, you will receive these services. After the settlement is finalized, we will provide additional information on how to utilize ID Experts' services. You do not need to anything now to receive these services.