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11 Attorneys for Defendant SAFEWAY INC.

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF ALAMEDA

14 ROHINI KUMAR, individually, and on behalf
15 of herself, the general public and those
16 similarly situated,

17 Plaintiff,

18 v.

19 SAFEWAY INC.; and DOES 1 THROUGH
20 50,

21 Defendants.

Case No. RG14726707

Assigned For All Purposes To The
Honorable Winifred Y. Smith, Dept. 21

**DECLARATION OF DOMINIQUE
BARNET REGARDING CATALINA
NOTICE**

DATE: March 16, 2018

TIME: 10:00 a.m.

DEPT: 21

1 I, Dominique Barnet, declare:

2 1. I am a Director, Brand Development for Catalina Marketing Corporation
3 (“Catalina”). Among other services, Catalina provides in-store coupon printing for retailers,
4 including Defendant Safeway Inc. I have personal knowledge of the following facts and am
5 authorized to execute this declaration on Catalina’s behalf.

6 2. Safeway contracted with Catalina to provide an in-store notice of the Safeway Select
7 Olive Oil settlement through Catalina coupons, a true and correct copy of which is set forth below
8 (hereinafter the “Notice”):

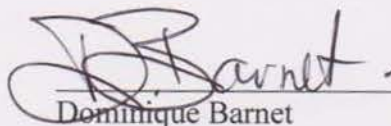
9
10 **Notice to all purchasers of Safeway SELECT® olive oil**
11 **between May 2010 and December 16, 2017**
12 **You may be affected by a class action settlement that makes**
13 **available cash and Safeway voucher benefits.**
14 **For more information, visit www.safewayoliveoilnotice.com**

15 3. Commencing on November 27, 2017, and concluding on January 26, 2018 (the
16 “Notice Period”), Catalina distributed the Notice, pursuant to the agreed upon terms, to those
17 consumers purchasing one or more Safeway Select olive oils, at all US Safeway retail stores in
18 Catalina’s network.

19 4. Catalina printed approximately 188,771 Notices during the Notice Period.

20 I declare under penalty of perjury under the laws of California that the foregoing is true and
21 correct.

22 Executed this 5 day of February, 2018.

23 
24 _____
25 Dominique Barnet