

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

ELENA BOTTS, on behalf of herself  
and all others similarly situated,

Plaintiff,

vs.

THE JOHNS HOPKINS  
UNIVERSITY,

Defendant.

Civil Action No. 1:20-cv-01335-JRR

**NOTICE OF COMPLIANCE WITH  
28 U.S.C. § 1715**

PLEASE TAKE NOTICE that pursuant to Section 4.1.5 of the Settlement Agreement (Dkt. 85-2 at 8) appended to plaintiff's Motion for Preliminary Approval of the Settlement (Dkt. 85), defendant Johns Hopkins University respectfully files this Notice and Declaration from JND Legal Administration to confirm that the required notice of the proposed settlement was sent pursuant to 28 U.S.C. § 1715 on December 19, 2022.

DATED: December 19, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By           /s/ Jonathan Cooper          

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*Attorneys for Defendant,  
Johns Hopkins University*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice of Supplemental Authority was served on all counsel of record on December 19, 2022, using the Court's CM/ECF system, which will send a notification of such filing.

/s/ Jonathan Cooper  
Jonathan Cooper

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

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Civil Action No. 1:20-cv-01335-JRR

**DECLARATION OF JENNIFER M.  
KEOUGH ON IMPLEMENTATION  
OF CAFA NOTICE**

I, JENNIFER M. KEOUGH, hereby declare and state as follows:

1. My name is Jennifer M. Keough. I am over the age of 21 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Chief Executive Officer (“CEO”) of JND Legal Administration LLC (“JND”), the company retained to serve as Notice and Settlement Administrator in this case. This Declaration is based on my personal knowledge, as well as information provided to me by experienced JND employees and Counsel and if called upon to do so, I could and would testify competently thereto. I have overseen and handled Class Action Fairness Act (“CAFA”) notice mailings for more than 375 class action settlements.

**CAFA NOTICE IMPLEMENTATION**

3. JND maintains a list of state and federal officials with contact information for the purpose of providing CAFA notice.

4. On December 19, 2022, at the direction of counsel for the Defendant Johns Hopkins University, and in compliance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, JND sent 60 CAFA Notice Packages (“Notice”). The Notice was mailed to 60 officials, including the Attorneys General of each of the 50 states, the District of Columbia and the United States Territories. The materials sent to the Attorneys General included a cover letter, which provided notice of the

proposed settlement of the above-captioned case. The cover letter is included as Exhibit 1.

5. JND compiled a CD-ROM containing the following documents with an accompanying cover letter and attachment of recipients:

A. **Complaint.pdf**

Class Action Complaint and Demand for Jury Trial, filed May 29, 2020 (Dkt. 1)

B. **Amended Complaint.pdf**

First Amended Class Action Complaint and Demand for Jury Trial, filed September 10, 2020 (Dkt. 35)

C. **Plaintiff's Motion for Preliminary Approval.pdf**

Plaintiff's Motion for Preliminary Approval of Class Settlement and for Order Directing Notice, filed December 9, 2022 (Dkt. 85)

D. **Memorandum of Law.pdf**

Memorandum of Law in Support of Plaintiff's Motion for Preliminary Approval of Class Settlement and for Order Directing Notice, filed December 9, 2022 (Dkt. 85-1)

E. **Class Settlement Agreement and Release.pdf**

Class Settlement Agreement and Release, filed December 9, 2022 (Dkt. 85-2)

F. **Notice re Proposed Order.pdf**

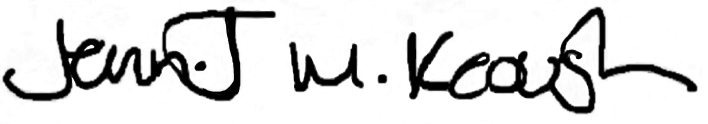
Notice re Proposed Order, filed December 12, 2022 (Dkt. 86)

**G. Proposed Order Preliminarily Approving Settlement.pdf**

Proposed Order Preliminarily Approving Settlement and  
Directing Notice to Settlement Class, filed December 13, 2022  
(Dkt. 87)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 19, 2022.

By 

Jennifer M. Keough



# EXHIBIT 1

December 19, 2022

The Appropriate Federal  
and State Officials  
Identified in Attachment A

**RE: CAFA Notice of Proposed Class Action Settlement**

Dear Sir or Madam:

This Notice is being provided to you in accordance with the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715 on behalf of Johns Hopkins University, the defendant in the below-referenced class action (“the Action”). Plaintiff’s Motion for Preliminary Approval of Class Action Settlement was filed with the Court on December 9, 2022.

**Case Name:** *Elena Botts v. Johns Hopkins University*  
**Case Number:** *1:20-cv-01335-JRR*  
**Jurisdiction:** *United States District Court District of Maryland*  
**Date Settlement filed with Court:** *December 9, 2022*

Copies of all materials filed in the above-named Action are electronically available on the Court’s Pacer website found at <https://pcl.uscourts.gov>. Additionally, in compliance with 28 U.S.C. § 1715(b), the enclosed CD-ROM contains the following documents filed in the Action:

**01 – Complaint.pdf**

Class Action Complaint and Demand for Jury Trial, filed May 29, 2020

**02 – Amended Complaint.pdf**

First Amended Class Action Complaint and Demand for Jury Trial, filed September 10, 2020

**03 – Plaintiff’s Motion for Preliminary Approval.pdf**

Plaintiff’s Motion for Preliminary Approval of Class Settlement and for Order Directing Notice, filed December 9, 2022

**04 – Memorandum of Law.pdf**

Memorandum of Law in Support of Plaintiff’s Motion for Preliminary Approval of Class Settlement and for Order Directing Notice, filed December 9, 2022

**05 – Class Settlement Agreement and Release.pdf**

Class Settlement Agreement and Release, filed December 9, 2022

**06 – Notice re Proposed Order.pdf**

Notice re Proposed Order, filed December 12, 2022

**07 – Proposed Order Preliminarily Approving Settlement.pdf**

Proposed Order Preliminarily Approving Settlement and Directing Notice to Settlement Class, filed December 13, 2022

The Settlement Class is comprised of 8,603 known Class Members residing in all 50 U.S. states, including the District of Columbia and the U.S. territories and associated states.

There are no other settlements or agreements made between Counsel for the parties related to the class defined in the proposed settlement, and as of the date of this Notice, no Final Judgment or notice of dismissal has been entered in this case.

If you have any questions regarding the details of the case and settlement, please contact Defense Counsel's representative at:

Shon Morgan  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa St. 10<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 443-3000  
Email: shonmorgan@quinnemanuel.com

For questions regarding this Notice, please contact JND at:

JND Class Action Administration  
1100 2nd Ave, Suite 300  
Seattle, WA 98101  
Phone: 800-207-7160

Regards,

JND Legal Administration

Encl.

# Attachment A

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