



Cameron Azari

Vice President, Epiq
Director, Hilsoft Notifications



Cameron R. Azari, Esq., is a vice president of Epiq and the director of Hilsoft Notifications. Mr. Azari has more than 18 years of experience in the design and implementation of legal notification and claims administration programs. He and his staff are nationally recognized specialists in the creation of notification campaigns in compliance with Fed R. Civ. P. 23(c)(2) (d)(2) and (e) and similar state class action statutes.

CASE EXPERIENCE

Mr. Azari has been responsible for hundreds of legal notice and advertising programs. He's an expert at providing consultative guidance with respect to all aspects of the class action settlement process from notice plan implementation through disbursements. Recent cases where Mr. Azari has been certified by the Court as a notice expert and filed an expert opinion and/or testified are listed below.

- *In re: Takata Airbag Products Liability Litigation (OEMs – BMW, Mazda, Subaru, Toyota, Honda, Nissan and Ford)*, MDL No. 2599 (S.D. Fla.) (\$1.49 billion in settlements regarding Takata airbags. The monumental Notice Plans included individual mailed notice to more than 59.6 million potential Class Members and extensive nationwide media via consumer publications, U.S. Territory newspapers, radio spots, internet banners, mobile banners, and specialized behaviorally targeted digital media. Combined, the Notice Plan reached more than 95% of adults aged 18+ in the U.S. who owned or leased a subject vehicle an average of 4.0 times each).
- *Hale v. State Farm Mutual Automobile Insurance Company, et al.*, 12-cv-00660 (S.D. Ill.) (\$250 million settlement with approximately 4.7 million class members. The extensive Notice Program provided individual notice via postcard or email to approximately 1.43 million class members and a robust publication program, which combined individual notice reached approximately 78.8% of all U.S. Adults Aged 35+ approximately 2.4 times each. Hilsoft Notifications also designed and implemented a similar Notice Program to provide Class Certification Notice).

CONTACT INFORMATION

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- *In re: Volkswagen “Clean Diesel” Marketing, Sales Practices and Product Liability Litigation (Bosch Settlement)*, MDL No. 2672 (N.D. Cal.) (Comprehensive Notice Program within the *Volkswagen Emissions Litigation* that provided individual notice to more than 946,000 vehicle owners via first class mail and to more than 855,000 via email. A targeted internet campaign further enhanced the notice effort).
- *In re: Oil Spill by the Oil Rig “Deepwater Horizon” in the Gulf of Mexico, on April 20, 2010*, MDL No. 2179 (E.D. La.). One of the largest claim deadline notice campaigns ever implemented, for BP’s \$7.8 billion settlement claim deadline relating to the Deepwater Horizon oil spill. Hilsoft Notifications designed and implemented the claim deadline notice program, which resulted in a combined measurable paid print, television, radio and Internet effort that reached in excess of 90% of adults aged 18+ in the 26 identified DMAs covering the Gulf Coast Areas an average of 5.5 times each.
- *In re: Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y.). Monumental \$6.05 billion settlement reached by Visa and MasterCard. The intensive notice program involved over 19.8 million direct mail notices to class members together with insertions in over 1,500 newspapers, consumer magazines, national business publications, trade & specialty publications, and language & ethnic targeted publications. Hilsoft also implemented an extensive online notice campaign with banner notices, which generated more than 770 million adult impressions, a case website in eight languages, and sponsored search listings.
- *In re: Energy Future Holdings Corp., et al. (Asbestos Claims Bar Date Notice)*, 14-10979(CSS) (Bankr. D. Del.). Large asbestos bar date notice effort, which included individual notice, national consumer publications, hundreds of local and national newspapers, Spanish newspapers, union labor publications, and digital media to reach the target audience.
- *In re: Oil Spill by the Oil Rig “Deepwater Horizon” in the Gulf of Mexico, on April 20, 2010*, MDL No. 2179 (E.D. La.). Companion landmark settlements, one covering economic damages and the other medical claims, reached by BP. Notice efforts included over 5,400 insertions in 2,000+ publications, over 10,000 local television and radio spots, local and national banner ads, notices in English, Spanish and Vietnamese. Coordination of data clean-up and address searches and execution of email notice effort.
- *In Re: Checking Account Overdraft Litigation*, MDL No. 2036 (S.D. Fla.). Multiple bank settlements in 2010-2018 involving direct mail and email to millions of class members and publication in relevant local newspapers. Representative banks include, Fifth Third Bank, National City Bank, Bank of Oklahoma, Webster Bank, Harris Bank, M & I Bank, PNC Bank, Compass Bank, Commerce Bank, Citizens Bank, Great Western Bank, TD Bank, BancorpSouth, Comerica Bank, Susquehanna Bank, Associated Bank, Capital One, M&T Bank, Iberiabank and Synovus.
- *In re: Residential Schools Class Action Litigation, Canada*. Application deadline notice program for the landmark settlement between the Canadian government and Aboriginal former students. This five phase notice effort began in 2011 with phase one, which included 37 general circulation newspapers in English and French, 38 Aboriginal publications in English, French, Inuktitut, Innuinaqtun, Siglit and Oji-Cree, approximately 2,293 radio spots in 14 languages (English, French, Cree, Dene’, Ojibway, North and South Slavey, Tlicho, Gwich’in, South Tutchone, Inuktitut, Oji-Cree, Innu and Atikamekw) and approximately 1,039 television spots in English, French, Inuktitut and Cree. The four additional phases of notice provided similar outreach.
- *In Re: Zurn Pex Plumbing, Products Liability Litigation*, MDL No. 1958, (D. Minn.). Nationwide building products settlement with individual mailed notice and an extensive publication notice effort. The publication notice alone exposed adults to the notice more than 201 million times during the notice period.



- *In re: Countrywide Customer Data Breach Litig.*, 3:08-md-01998-TBR, MDL No. 1998 (W.D. KY.). Notice effort involved direct mail to over 11,000,000 Class members and publication in over 2,000 newspapers nationwide.
- *In re: Puerto Rican Cabotage Antitrust Litigation*, No. 08-md-1960 (D. P.R.). Involved a 2010 notice effort in English and Spanish of multiple settlements. Individual notice to all direct purchasers and publication in relevant U.S. and Puerto Rican general circulation and trade publications.
- *In re: Department of Veterans Affairs (VA) Data Theft Litigation*, MDL No. 1796 (D.D.C.). Notices appeared across the country in newspapers, consumer magazines and specialty publications with a total circulation exceeding 76 million.
- *In re: Heartland Customer Data Security Breach Litigation*, 4:09-MD-2046, MDL No. 2046, (S.D. Tex.). Publication notice approved to appear nationwide in over 1,000 newspapers, in major consumer magazines and online via banner advertisements.
- *Vereen v. Lowe's Home Centers*, SU10-CV-2267B (Ga. Super. Ct.). Extensive point of sale notice program of a settlement providing payments up to \$100,000 related to Chinese drywall – 100 million notices distributed to Lowe's purchasers during a six-week period.

EDUCATION

Mr. Azari holds a Bachelor of Science degree from Willamette University and a Juris Doctor from Northwestern School of Law at Lewis and Clark College.

ADMITTED TO PRACTICE

Mr. Azari is an active member of the Oregon State Bar.

SPEAKING EXPERTISE

Mr. Azari has shared his expertise in the following notable speeches and articles.

- Moderator, "Prepare for the Future of Automotive Class Actions." Bloomberg Next, Webinar-CLE, November 6, 2018.
- "The Battleground for Class Certification: Plaintiff and Defense Burdens, Commonality Requirements and Ascertainability." 30th National Forum on Consumer Finance Class Actions and Government Enforcement, Chicago, IL, July 17, 2018.
- "Recent Developments in Class Action Notice and Claims Administration." PLI's Class Action Litigation 2018 Conference, New York, NY, June 21, 2018.
- "One Class Action or 50? Choice of Law Considerations as Potential Impediment to Nationwide Class Action Settlements." 5th Annual Western Regional CLE Program on Class Actions and Mass Torts. Clyde & Co LLP, San Francisco, CA, June 22, 2018.
- "Proposed Changes to Rule 23 Notice and Scrutiny of Claim Filing Rates," DC Consumer Class Action Lawyers Luncheon, December 6, 2016.
- "Recent Developments in Consumer Class Action Notice and Claims Administration." Berman DeValerio Litigation Group, San Francisco, CA, June 8, 2016.
- "2016 Cybersecurity & Privacy Summit. Moving From 'Issue Spotting' To Implementing A Mature Risk Management Model." King & Spalding, Atlanta, GA, April 25, 2016.
- "Live Cyber Incident Simulation Exercise." Advisen's Cyber Risk Insights Conference, London, UK, February 10, 2015.
- "Pitfalls of Class Action Notice and Claims Administration." PLI's Class Action Litigation 2014 Conference, New York, NY, July 9, 2014.



- “Class Settlement Update – Legal Notice and Court Expectations.” PLI’s 19th Annual Consumer Financial Services Institute Conference, New York, NY, April 7-8, 2014 and Chicago, IL, April 28-29, 2014.
- “Legal Notice in Consumer Finance Settlements - Recent Developments.” ACI’s Consumer Finance Class Actions and Litigation, New York, NY, January 29-30, 2014.
- “Legal Notice in Building Products Cases.” HarrisMartin’s Construction Product Litigation Conference, Miami, FL, October 25, 2013.
- “Legal Notice in Consumer Finance Settlements Getting your Settlement Approved.” ACI’s Consumer Finance Class Actions and Litigation, New York, NY, January 31-February 1, 2013.
- “Perspectives from Class Action Claims Administrators: Email Notice and Response Rates.” CLE International’s 8th Annual Class Actions Conference, Los Angeles, CA, May 17-18, 2012.
- “Class Action Litigation Trends: A Look into New Cases, Theories of Liability & Updates on the Cases to Watch.” ACI’s Consumer Finance Class Actions and Litigation, New York, NY, January 26-27, 2012.
- “Data Breaches Involving Consumer Financial Information: Litigation Exposures and Settlement Considerations.” ACI’s Consumer Finance Class Actions and Litigation, New York, NY, January 2011.
- “Notice in Consumer Class Actions: Adequacy, Efficiency and Best Practices.” CLE International’s 5th Annual Class Action Conference: Prosecuting and Defending Complex Litigation, San Francisco, CA, 2009.
- “Planning for a Smooth Settlement.” American Conference Institute: Class Action Defense - Complex Settlement Administration for the Class Action Litigator, Phoenix, AZ, 2007.
- “Structuring a Litigation Settlement.” CLE International’s 3rd Annual Conference on Class Actions, Los Angeles, CA, 2007.
- “Noticing and Response Rates in Class Action Settlements.” Class Action Bar, Vancouver, British Columbia, 2007.
- “Noticing and Response Rates in Class Action Settlements.” Skadden Arps Slate Meagher & Flom, LLP, New York, NY, 2006.
- “Noticing and Response Rates in Class Action Settlements.” Bridgeport Continuing Legal Education, Class Action and UCL, San Diego, CA, 2006.
- “Noticing and Response Rates in Class Action Settlements.” Stoel Rives Litigation Group, Portland, OR / Seattle, WA / Boise, ID / Salt Lake City, UT, 2005.
- “Noticing and Response Rates in Class Action Settlements.” Stroock Stroock & Lavan Litigation Group, Los Angeles, CA, 2005.
- “A Scientific Approach to Legal Notice Communication.” Weil Gotshal Litigation Group, New York, NY, 2003.

PUBLICATIONS

Mr. Azari has published many articles about class action noticing requirements, including:

- *A Practical Guide to Chapter 11 Bankruptcy Publication Notice* [E-book]. May 2017.
- “What You Need to Know About Frequency Capping In Online Class Action Notice Programs.” Class Action Litigation Report, June 2014.
- “Class Action Legal Noticing: Plain Language Revisited.” Law360, April 2013.
- “Clearing the Five Hurdles of Email - Delivery of Class Action Legal Notices.” Thomson Reuters Class Action Litigation Reporter, June, 2008.
- “Twice the Notice or No Settlement.” Current Developments - Issue II, August, 2003.