

EXHIBIT A

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13 Attorneys for Plaintiffs

14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 HEATHER TURREY, et al.,
17 Plaintiffs,
18 v.
19 VERVENT, INC., etc., et al.,
20 Defendants.

Case No. 3:20-cv-00697-DMS-AHG
CLASS ACTION

**JOINT PROPOSED PLAN OF
ALLOCATION**

District Judge Dana M. Sabraw
Courtroom 13A, 13th Fl. (Carter-Keep)
Magistrate Judge Allison H. Goddard
Chambers Room 3B, (Schwartz)
Complaint Filed: April 10, 2020

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1 Class by Epiq Systems, Inc. ("Epiq") in accordance with this proposed Plan of
2 Allocation or such other plan of allocation as the Court may approve.

3 4. Based on the formulas set forth below, a "Total Payments" figure will be
4 calculated for each Plaintiff and RICO Class Member that is listed in the Class List.
5 The Total Payments figure for each Plaintiff and RICO Class Member will be
6 calculated as a sum of all payments each person made during the applicable Class
7 Period.

8 5. The Class List is based on spreadsheet reports, identified with Bates
9 numbers VERVENT0260076 and VERVENT0260077, generated by Defendants
10 during discovery that show all PEAKS borrowers that made payments to Defendants
11 during the Class Period and the amounts of those payments.

12 6. The Class Fund shall be distributed to Plaintiffs and RICO Class
13 Members on a pro rata basis based on the relative size of each person's Total
14 Payments. Specifically, a "Gross Award Amount" will be calculated for each Plaintiff
15 and RICO Class Member, which will be the sum of each person's Total Payments
16 divided by the combined Total Payments for all Plaintiffs and RICO Class Members,
17 multiplied by the total amount in the Class Fund.

18 7. Distributions will be made to Plaintiffs and RICO Class Members
19 pursuant to this Plan of Allocation after the Court has approved this Plan of
20 Allocation. Payments will be made to each Class Member either by check or digital
21 payment at the Class Member's election.

22 8. Plaintiffs and RICO Class Members with a valid email address will be
23 sent an email allowing them to select a digital payment option, which includes ACH
24 bank deposit, PayPal, Venmo, Zelle, and digital MasterCard, or a physical check.

25 9. Any payees who select a digital payment method will be directed to an
26 online form to verify their identity as a class member and provide information
27 necessary to process their digital payment.

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10. Any payees who do not make a selection or for whom Epiq does not have a valid email address, will be issued by physical check mailed via United States Postal Service First-Class Mail.

11. In the event that any payment from the Class Fund is not claimed by the original stale date (i.e., more than 60 days from the payment's original issue date), Epiq will reissue the payments as physical checks mailed via USPS First-Class Mail.

12. In the event that any physical check is returned undeliverable or otherwise not cashed by the original stale date (i.e., more than 120 days from the payment's original issue date), Epiq shall use reasonable efforts to locate the Plaintiffs and RICO Class Members whose payments remain uncashed and reattempt distribution.

13. If after completion of such follow-up efforts \$100,000 or more remains in the Class Fund, Epiq shall conduct pro rata re-distributions of the remaining funds to Class Members who have previously successfully received payment until the remaining balance is under \$100,000. At such time as the remaining balance is less than \$100,000, the remaining funds shall be distributed to a cy pres recipient to be established later upon approval by the Court.

14. Epiq's costs of administration will be paid directly from the Class Fund. \$50,000 will be withheld from the initial class distributions to cover the anticipated costs of administration.

Service Awards

15. The service awards to the Named Plaintiffs, plus any additional interest accruing after September 23, 2026, shall be paid to the Named Plaintiffs by check. This includes \$26,669.32 to Plaintiff Turrey, and \$21,335.45 to Plaintiffs Fiatty, Hernandez, and Sazon, plus any proportionate interest accrued after September 23, 2026.

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Attorneys' Fees and Costs

16. The attorneys' fees, costs and expenses award and the supplemental attorneys' fees award, plus any additional interest accruing after September 23, 2026, shall be paid to Class Counsel by wire upon approval of this Plan of Allocation.

17. Should the Court award additional attorneys' fees related to the appeal or other proceedings, those fees shall be similarly distributed directly to Class Counsel by wire or check upon approval of those fees.

Respectfully submitted,

Dated: September 23, 2026

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