

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA,

CASE NO.:502017CA003860XXXXMBAG

HSBC BANK USA, NATIONAL
ASSOCIATION AS TRUSTEE FOR SG
MORTGAGE SECURITIES TRUST 2005 OPTI
ASSET-BACKED CERTIFICATE SERIES 2005,

Plaintiff/Counter-Defendant,

vs.

MONIQUE L'ITALIEN, and STEFANIE L'ITALIEN,
etc., et. ux., et al.,

Defendants/Plaintiffs-in-Counterclaim

vs.

HSBC BANK USA, NATIONAL
ASSOCIATION AS TRUSTEE FOR SG
MORTGAGE SECURITIES TRUST 2005 OPTI
ASSET-BACKED CERTIFICATE SERIES
2005, and OCWEN LOAN SERVICING, LLC.,

Defendants-in-Counterclaim

**DECLARATION OF ANDREW CLEMENTS REGARDING
NOTICE OF CLASS ACTION COUNTERCLAIM SETTLEMENT AND SETTLEMENT
ADMINISTRATION**

I, Andrew Clements, hereby declare and state as follows:

1. I am over the age of 18 and *sui juris*.
2. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). I have more than seven (8) years of experience handling all aspects of settlement administration.

3. The statements of fact in this declaration are based on my personal knowledge and information provided to me by my colleagues in the ordinary course of business, and if called on to do so, I could and would testify competently thereto.

4. Settlement Services Inc. (“SSI”), an Epiq Company, was appointed as Class Administrator. SSI has now been retained to assist in the notice to the Class of the Court’s dispositive rulings and the settlement with Counterclaim Defendant HSBC Bank USA, National Association as Trustee for SG Mortgage Securities Trust 2005 OPTI Asset-Backed Securities Trust 2005-OPTI (“HSBC”). Further SSI has also been engaged to assist with the distribution of the monetary damages awarded by the Court, and to otherwise perform the necessary services of a Class Administrator. The notice and distribution comply with the Court’s Order Granting Preliminary Approval of Settlement and authorizing and approving the notice of class action counterclaim settlement (“Order”).

5. Epiq was established in 1968 as a client services and data processing company. Epiq has administered bankruptcies since 1985 and settlements since 1993. Epiq has routinely developed and executed notice programs and administrations in a wide variety of mass action contexts including settlements of consumer, antitrust, products liability, and labor and employment class actions, settlements of mass tort litigation, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered more than 4,500 settlements, including some of the largest and most complex cases ever settled. Epiq’s class action case administration services include administering notice requirements, designing direct-mail notices, implementing notice fulfillment services, coordinating with the United States Postal Service (“USPS”), developing and maintaining notice websites and dedicated telephone numbers with

recorded information and/or live operators, processing exclusion requests, objections, claim forms and correspondence, maintaining class member databases, adjudicating claims, managing settlement funds, and calculating claim payments and distributions. As an experienced neutral third-party administrator working with settling parties, courts, and mass action participants, Epiq has handled hundreds of millions of notices, disseminated hundreds of millions of emails, handled millions of phone calls, processed tens of millions of claims, and distributed hundreds of billions in payments.

OVERVIEW OF ADMINISTRATION

6. Pursuant to the Order Epiq was retained to provide, and did provide, the following administrative services:

- As appropriate, email a Class Notice of Counterclaim Settlement to Class Members;
- As appropriate, mail a Class Notice of Counterclaim Settlement to Class Members;
- Establish and maintain a website containing information about the Settlement;
- Establish and maintain an official toll-free number that Settlement Class Members may contact for additional information about the Settlement; and
- Review and track objections sent to or received by Epiq.

DATA TRANSFER

7. On December 19, 2025, Class Counsel provided Epiq with one electronic file containing potential Class Member records. The file contained 39,836 names and addresses for potential Class Members (“Data”).

8. Epiq loaded the information provided by Counsel into a database created for the purpose of administration of the proposed Settlement. Epiq assigned unique identifiers to all the records it received in order to maintain the ability to track them throughout the Settlement administration process. Epiq combined the data and removed exact duplicate records, which resulted in 27,592 of Class Member records (the “Class List”).

DISSEMINATION OF INDIVIDUAL CLASS NOTICE OF COUNTERCLAIM

SETTLEMENT VIA EMAIL

9. Pursuant to the Order, Epiq was to cause the Court-approved Class Notice of Counterclaim Settlement to be formatted for electronic distribution by email to Class Members for whom an email address was included in the Class Data. The Email Notice contained substantial, albeit easy to read, information that made potential Class Members aware of their rights under the Settlement and provided instructions on how to obtain more information by visiting the settlement website or toll-free number.

10. The Email Notice, which was formatted for distribution using imbedded html text, provided Class Members with a link to the settlement website. The Email Notice was formatted with easy to read text without graphics, tables, images and other elements that would increase the likelihood that the message could be blocked by Internet Service Providers and/or SPAM filters. Epiq also followed standard email protocols, including utilizing “unsubscribe” links and Epiq’s contact information in the Email Notice.

11. Epiq sent the Email Notice to the 18,909 potentially valid email addresses on January 2, 2026. Each Email Notice was transmitted with a unique message identifier. If the

receiving e-mail server could not deliver the message, a “bounce code” was returned along with the unique message identifier.

12. For all Class Members with potentially valid email addresses in the Class Data, Epiq closely monitored all deliverability attempts of the Email Notice throughout the Email Notice campaign. A total of 16,265 Email Notices were delivered. Ultimately, Epiq was able to deliver direct Email Notice to 86.02% of the email addresses provided in the Class Data.

**DISSEMINATION OF THE INDIVIDUAL CLASS NOTICE OF COUNTERCLAIM
SETTLEMENT BY POSTAL MAIL**

13. Pursuant to the Order, Epiq sent Class Notice of Counterclaim Settlement to all potential Class Members via U.S. First Class Mail. Attached hereto as **Attachment 1** is the postcard notice that Epiq disseminated by mail (“Notice”).

14. Prior to mailing the Notice, all mailing addresses were checked against the National Change of Address (“NCOA”) database maintained by the United States Postal Service (“USPS”).¹ In addition, the addresses were processed via the Coding Accuracy Support System (“CASS”) to ensure the quality of the zip code, and verified through Delivery Point Validation (“DPV”) to verify the accuracy of the addresses. To the extent that any Class Member had filed a USPS change of address request, and the address was certified and verified, the current address listed in the NCOA database was used in connection with the Notice mailing. This address updating process is standard for the industry and for the majority of promotional mailings that occur today.

¹ The NCOA database contains records of all permanent change of address submissions received by the USPS for the last four years. The USPS makes this data available to mailing firms and lists submitted to it are automatically updated with any reported move based on a comparison with the person’s name and last known address.

15. Prior to commencing any mailings for this matter, Epiq established a post office box to mail notice from and to allow Class Members to contact the Settlement Administrator or submit documents by mail. Epiq has and will continue to maintain the P.O. Box throughout the administration process.

16. On January 2, 2026, Epiq mailed 8,654 Notices via First Class USPS Mail to potential Class Members on the Class List with a valid mailing address.

17. The return address on the Class Notices is the post office box maintained by Epiq. As of February 4, 2026, 19 Notices sent to Class Members have been returned by the USPS with forwarding information and promptly re-mailed to the forwarding address.

18. As of February 4, 2026, a total of 2,457 Notices sent to Class Members have been returned to Epiq without forwarding address information. As a result of skip trace searches performed by Epiq using a third-party lookup service, a total of 1,088 addresses were updated and 1,088 Notices were re-mailed to the updated addresses for Class Members.

19. As of February 4, 2026, a total of 2,644 Email Notices “bounced” back as undeliverable in the email campaign effort. A total of 2,625 had a valid physical mailing address on file and 2,625 Notices were re-mailed to the address on file.

20. As of February 4, 2026, Epiq had mailed and/or emailed Notice to 27,525 Class Members, with Notice to 1,376 unique Class Members currently known to be undeliverable, which is a 95% deliverable rate to the Class.

WEBSITE

21. Epiq launched a website, www.OcwenFloridaSettlement.com, that potential Class Members could visit to obtain additional information about the proposed Settlement, as well

as important documents, including the Class Notice, Class List, Motion for Preliminary Approval, Preliminary Approval Order, Settlement Agreement, and any other relevant information that the parties agree to provide or that the Court may require (“Website”). The Website contains a summary of options available to Class Members, deadlines to act, and provides answers to frequently asked questions. References to the Website were prominently displayed in the Class Notice.

22. As of February 4, 2026, the Website has been visited by 1,471 unique visitors and 2,514 website pages have been viewed.

TOLL-FREE INFORMATION LINE

23. Epiq established and is maintaining a toll-free interactive Voice Response Unit (“VRU”), telephone number, to provide information and accommodate inquiries from Class Members. Callers hear an introductory message and then are provided with scripted information about the Settlement in the form of recorded answers to frequently asked questions. Callers also have the options of leaving a voicemail for a call center representative to call them back or speaking to a live operator during normal business hours. The toll-free number was included in the Notice sent to Class Members and the automated telephone system is available 24 hours per day, 7 days per week.

24. Between January 2, 2026 and February 4, 2026, the toll-free number received 46 calls representing 553 total minutes, and call center representatives have handled 31 inbound calls representing 127 minutes of use and one (1) outbound calls representing 6 minutes of use.

OBJECTIONS

25. Pursuant to the Order, Class Members who wished to object to the Settlement were required to submit written objections to Class Counsel, such that they were postmarked and received 15 days prior to the hearing on Final Approval of Settlement. As of February 4, 2026, Epiq is not aware of any timely written objections to the Settlement.

Under penalties of perjury, I declare that I have read the foregoing Declaration and that the facts stated in it are true.

Andrew Clements

Andrew Clements

Project Manager

Epiq Class Action & Claims Solutions, Inc. (“Epiq”)