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MONTEREY PENINSULA WATER
7 MANAGEMENT DISTRICT

**[Exempt From Filing Fee
Government Code § 6103]**

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

9 **FOR THE COUNTY OF MONTEREY**

10
11 RICHARDS J. HEUER III, an individual, on
behalf of himself and all others similarly
12 situated.,

13 Plaintiff/Petitioner,

14 v.
15 THE MONTEREY PENINSULA WATER
MANAGEMENT DISTRICT, a California
16 public agency; and DOES 1 through 10, ,
17 Respondents and Defendants.

Case No. 24CV002642

**Declaration of Nishil Bali in Support of
Final Approval of Class Action
Settlement**

Assigned for All Purposes to:
Hon. Carrie M. Panetta
Department 14

Date: December 19, 2025
Time: 8:30 a.m.
Dept. 14

Action Filed: June 25, 2024

DECLARATION OF NISHIL BALI

I, Nishil Bali, declare as follows:

3 1. I am the Chief Financial Officer and Administrative Services Manager for
4 Defendant Monterey Peninsula Water Management District, a party in the above-entitled action. I
5 have personal knowledge of the matters set forth herein and if called as a witness, I could
6 competently testify thereto.

7 2. The District has mailing addresses for each parcel that paid the Water Supply
8 Charge during the Class Period. To the extent any notice could not be delivered to a Class Member
9 at that address, either because the Class Member moved or the purported address was unmailable,
10 the District used Smarty Streets to search for correct or forwarding addresses, if available. Smarty
11 Streets is a United States Postal Service CASS-Certified provider.¹

12 3. The District mailed 30,831 notices to Class Members by July 29, 2025. Of those,
13 11 were returned with forwarding addresses, and those were re-mailed to the forwarding
14 addresses.

15 4. The District estimated it would spend approximately \$147,077 total administering
16 this settlement, including mailing notices and refund checks. As of the filing of this declaration,
17 the District is on budget and expects its total expenses will be \$147,077. Once the Court enters an
18 Order fixing the attorneys' fees and costs, enhancement award to Plaintiff, and administration
19 expenses, the District will be prepared to calculate individual refund amounts and to mail checks
20 pursuant to the Settlement Agreement.

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

23 Executed on this 21 day of November, 2025, at Monterey, California.

Nishil Bali

Nishil Bali

²⁸ ¹ See www.smarty.com/legal/certifications, as of May 12, 2025.