

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

**ANTHONY S. PARK, Individually on Behalf
Of Himself and On Behalf of All Others
Similarly Situated,**

Plaintiff,

Case No. 05 Civ. 2931 (WHP)

v.

THE THOMSON CORPORATION

and

**THOMSON LEGAL AND REGULATORY,
INC.,**

Defendants.

CLAIM FILING DECLARATION OF RICHARD L. SARTORY

I, Richard L. Sartory, declare as follows:

1. I submit this declaration in order to provide the Court updated information regarding the Claim Filing response in the above-captioned action (the "Park Settlement") received by Complete Claim Solutions, LLC ("CCS") as of May 30, 2008.
2. I am over 21 years of age and am not a party to the above-captioned Class Action. I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify competently with regard to those facts.
3. I am a Senior Project Administrator for CCS. CCS was appointed as the Settlement Administrator to assist in the process of providing notice to the potential members of the Settlement Class in this action.
4. As the Settlement Administrator, CCS is charged with, among other things, assisting in the process of providing notice to the potential Class Members, and receiving and processing the Claim Forms submitted by potential Class Members. CCS is also responsible for reporting the number of Claims and the number of Bar Review Courses purchased during the class period identified as March 15, 2001 through January 4, 2008.

5. In the Park Settlement, CCS mailed 280,058 Notice and Claim Form packets to the initial mailing database provided by the Defendant.
6. CCS has received 55,649 Claim Forms in the Park Settlement as of May 30, 2008.
7. The 55,649 Claim Forms received as of May 30, 2008 represent 75,271 Bar Review Courses. Claim Forms may include more than one Bar Review Course.
8. CCS serves as the Claims Administrator in the *Rodriguez, et al vs. West Publishing Corporation d/b/a BAR/BRI, Case No. CV 05-3222 R(MCx), United States District Court, Central District of California* (the "Rodriguez Settlement").
9. As the Claims Administrator in the Rodriguez Settlement, CCS is charged with assisting in the process of providing notice to the potential Class Members, and receiving and processing the Claim Forms submitted by potential Class Members. CCS is also responsible for reporting the number of Claims and the number of Bar Review Courses purchased during the class period identified as August 1, 1997 through July 31, 2006. In performing these tasks, CCS utilized a database that was provided by the Defendant, but is separate and distinct from the database provided in the Park Settlement. Furthermore, it is important to note that the auditing process is still ongoing in the Rodriguez Settlement, and until that auditing is completed, I am unable to state how many of the claims received in the Rodriguez Settlement actually are valid perfect claims.
10. CCS has received 88,148 Claim Forms in the Rodriguez Settlement.
11. The 88,148 Claim Forms received in the Rodriguez Settlement represent 123,964 Bar Review Courses. Claim Forms may contain more than one Bar Review Course.
12. Subject to the disclaimer I have provided at paragraph 9 to this declaration, based on a comparison of the initial mailing databases in both settlements, CCS has determined that 147,823

potential Class Members are eligible to participate in both the Park Settlement and the Rodriguez Settlement.

13. Of the potential Class Members eligible to file in both settlements, CCS has received 12,683 Claim Forms.

14. In the Park Settlement, the 12,683 Claim Forms represent 18,217 Bar Review Courses.

15. Of the potential Class Members eligible to file in both settlements, 14,610 Claim Forms were filed in the Rodriguez Settlement that did not file a Claim Form in the Park Settlement. The 14,610 Claim Forms filed in the Rodriguez Settlement that did not file in the Park Settlement represent 31,838 Bar Review Courses in the Rodriguez Settlement.

16. In the Park Settlement, CCS has determined that approximately 122 law firms have submitted a Claim Form, representing 5,285 Bar Review Courses.

17. As the Settlement Administrator in the Park Settlement, CCS is unable to determine the value of the Bar Review Courses contained in the Claim Forms. The value of the Bar Review Courses is not required in the calculation of the distribution proceeds.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.


Richard L. Sartory

Dated: June 6, 2008