

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

KERRY ROTH, on behalf of herself and
all others similarly situated,

CASE NO. 16-cv-62942WPD

Plaintiff,

v.

GEICO GENERAL INSURANCE
COMPANY,

Defendant.

MARIANNE JOFFE, DEBBE SCHERTZER,
and STEPHANIE RODRIGUEZ, individually
and on behalf of all others similarly situated,

CASE NO. 18-cv-61361-WPD

Plaintiffs,

v.

GEICO INDEMNITY COMPANY,
GOVERNMENT EMPLOYEES
INSURANCE COMPANY and GEICO
GENERAL INSURANCE COMPANY,

Defendants.

DECLARATION OF JEFFREY O. MARTIN

The undersigned, Jeffrey O. Martin, declares as follows:

My name is Jeffrey O'Neal Martin.

1. I am over the age of majority and provide this declaration voluntarily and based on my personal knowledge.

2. I graduated from public school in DeKalb County, Georgia, hold a Bachelor's degree in Mathematics and Economics from Vanderbilt University and a Master's degree in Economics from the University of Chicago.

3. I am employed as a consultant on statistical issues, a consultant on actuarial issues, and as a consultant to political campaigns.

4. My academic research and current work involve the use of computers and statistical procedures to analyze data. I have been qualified as an expert witness on statistical issues in Superior Courts in Georgia and South Carolina and in Federal Courts in Georgia, Alaska, Alabama, Michigan, and Washington.

5. I was initially engaged by Plaintiffs' counsel in the *Roth* and *Joffe* matters to analyze claims and payments data on Florida first party total loss private passenger auto claims by Defendants' insureds.

6. I have been asked to calculate that the monetary value of all claims under the terms of the Global Settlement Agreement for sales tax, title and tag transfer fees, and prejudgment interest. The Settlement Agreement covers approximately 18,000 claims.

7. The benefits to the class exceed approximately \$80.61 million, which includes: (1) approximately \$31.31 million in cash available for claimants; (2) \$40.25 million in prospective relief from GEICO's change in practice over a five-year period; and (3) \$8.7 million in attorneys' fees and \$350,000 in costs if approved by the Court. The \$80.61 million benefit does not include the approximately \$1.92 million that will have been paid pursuant to GEICO's change in business practice from August 1, 2020 through fairness hearing set for

February 5, 2021. The value of GEICO paying sales tax and title fees over a one-year period is \$6.8 million.

8. The average value per claim is over \$1,700.

9. The expanded class period provided by the Global Settlement (from July 31, 2019 through August 1, 2020) provides relief for 3,507 additional claims and \$5,713,940.24 in available settlement funds. This includes the addition of over 542 *Roth* class period claims, which add approximately \$1,083,000 in additional settlement funds.

10. I understand that under the Global Settlement, all class members will receive prejudgment interest (governed by Fla. Stat. § 55.03) instead of the lower postjudgment interest (governed by 28 U.S.C. 1961) to run until 60 days after the preliminary approval Order. This conversion results in additional available settlement funds of approximately \$160,000.

11. The percentage of the benefit as attorneys' fees is: 21.56%¹ not including prospective relief; 18.45% including only one year of prospective relief; and 10.8% including five years of prospective relief.

Further declarant sayeth not.

I declare under penalty of perjury that the foregoing is true and correct.

Dated 28th day of September 2020.

A handwritten signature in black ink, appearing to read "Jeffrey Martin", is written over a horizontal line. The signature is stylized and includes a large, circular flourish at the end.

Jeffrey Martin

¹ The benefit to the class not including prospective relief is \$40.36 million: \$31.31 million in available claim payments + \$8.7 million in attorneys' fees + \$350,000 in costs.