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Judge: Calendar, 16

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# EXHIBIT C

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

KATHRYN G. COLLIER and BENJAMIN M. SEITZ, on behalf of themselves and all others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 2016 CH 13568
	)	
SP PLUS CORPORATION,	)	The Honorable David B. Atkins
	)	Judge Presiding
Defendant.	)	
	)	

**DECLARATION OF RICHARD SIMMONS IN SUPPORT OF PLAINTIFFS’  
UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

I, Richard Simmons, declare as follows:

1. I am the president of Analytics Consulting LLC.
2. I joined Analytics in 1990 and have more than 35 years of experience developing and implementing class action communications and settlement programs.
3. I have developed and implemented notice campaigns ranging in size up to 45 million known class members and 180 million unknown class members.
4. I have testified regarding legal notice in privacy, building products, civil rights, consumer products, environmental pollution, and securities litigation settlements.
5. I have managed claims processes for settlement funds ranging up to \$1 billion.
6. I have been retained to provide notice and claims services attendant to the settlement of this matter.
7. Subject to this Court’s approval, digital advertisements will be geographically limited to the Dayton, OH Designated Market Area (DMA). This region encompassing ten Ohio

counties, including Montgomery, Greene, Miami, Clark, Darke, Champaign, Logan, Mercer, Preble, and Shelby.

8. Notice efforts will be focused on reaching adults who either live in or have recently been located within this DMA. Analytics would place particular emphasis on individuals likely to be frequent travelers, as this aligns with the behavior of class members in this matter (e.g., airport visitors).

9. A total of 1.0 million digital impressions will be delivered over the course of the campaign.

10. Digital advertisements would appear across two online platforms, selected for their ability to target users based on geographic location and relevant interests:

- Facebook: Impressions would target adults in the Dayton, OH media market who have expressed interest in travel-related content.
- Reddit: Impressions and/or posts would run in the *r/Dayton* subreddit, which is an online community for Dayton area residents.

11. The notice and administration process would also include signs posted at the main parking deck exit stations at Dayton International Airport as follows:

Did you park here between October 14, 2014, and October 14, 2016, and use a credit or debit card for payment, and receive an electronically printed paper receipt? If so, you can scan the QR Code below to see if you might be eligible to receive a voucher of up to \$23 to be used at this facility, subject to verification and certain limitations.

12. Finally, notice would include a one-time advertising run during the Claim Period in the Dayton Daily News (print edition).

13. This targeted digital advertising approach complies with legal standards for notice and due process and effectively informs individuals who are most likely to be affected by the Settlement.

14. The cost to administer this settlement is approximately \$44,000.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in Chanhassen, Minnesota, on January 9, 2026.

By:   
Richard Simmons