

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SVETLANA SHOLOPA and MILICA
MILOSEVIC, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

TURK HAVA YOLLARI A.O. (d/b/a Turkish
Airlines, a foreign corporation), and TURKISH
AIRLINES, INC., a New York Corporation,

Defendants.

Case No. 1:20-cv-03294-ALC

Hon. Andrew L. Carter

SECOND SUPPLEMENTAL
DECLARATION OF BRONYN
HEUBACH ON NOTICE PLAN AND
SETTLEMENT ADMINISTRATION

I, Bronyn Heubach, hereby declare and state as follows:

1. I am an Assistant Director at JND Legal Administration. JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience in all aspects of legal administration and has administered class actions in hundreds of cases.

2. JND is serving as the Settlement Administrator in the above-captioned litigation (the “Action”) pursuant to the Court’s Order Granting Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, filed April 4, 2023 (ECF 86).

3. This Declaration supplements the Declaration of Bronyn Heubach on Notice Plan and Settlement Administration, filed June 29, 2023 (ECF 93) (“Initial Notice Declaration”), and the Supplemental Declaration of Bronyn Heubach on Notice and Settlement Administration, filed July 19, 2023 (ECF 98), and provides an update on the claims administration process.

SETTLEMENT WEBSITE AND OTHER CLASS MEMBER NOTICE

Settlement Website

4. As described in the Initial Notice Declaration, on May 15, 2023, JND launched an interactive, case-specific Settlement Website at www.TASettlement.com, and this URL was listed in the Direct Notices.

5. As of the date of this Declaration, the Settlement Website has tracked a total of 49,502 unique users who registered 213,575 page views. JND will continue to update and maintain the Settlement Website throughout the settlement administration process.

Settlement Administrator Toll-Free Number

6. As described in the Initial Notice Declaration, on May 15, 2023, JND launched a 24-hour, toll-free information line that Class Members can call to obtain pre-recorded information about the Settlement.

7. As of the date of this Declaration, JND has received 1,009 calls to the toll-free number. JND will continue to maintain and update the toll-free number throughout the settlement administration process.

CLAIMS RECEIVED

8. As described in the Initial Notice Declaration, Class Members may file claims electronically through the Settlement Website or via postal mail. The deadline to file claims was postmarked by August 18, 2023.

9. As of the date of this Declaration, JND has received a total of 19,492 Claim Forms. Of these Claim Forms, 6,313 included claims for refunded tickets and 13,179 included claims for non-refunded tickets. JND continues to receive and process Claim Form submissions postmarked

by August, 18, 2023, and will continue to report to Counsel on the status of the claim intake and review.

OBJECTIONS

10. As described in the Initial Notice Declaration and as of the date of this Declaration, JND received one objection. In addition, JND has received one untimely objection. A copy of both objections are attached as Exhibit A.

REQUESTS FOR EXCLUSION

11. The Notices also informed Class Members of their right to opt out of the Settlement by submitting a written request for exclusion postmarked by July 17, 2023. We continued to receive timely opt-outs in the mail due to postal delays past this deadline, and JND promptly reported to Counsel any additional exclusion requests that were received.

12. As of the date of this Declaration, JND has received 33 timely requests for exclusion from Class Members, of which three were subsequently withdrawn. JND also received 22 timely exclusion requests from individuals who reside outside the United States and do not qualify as Class Members. One Class Member exclusion request was received after the deadline. A list of the 30 active Class Member opt-outs is attached as Exhibit B-1, and a list of the 22 non-Class Member opt-outs, as well as the one late Class Member opt-out, is attached as Exhibit B-2.

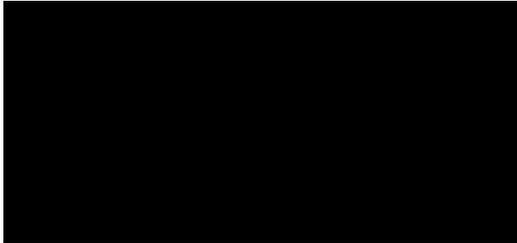
I declare under penalty of perjury that the foregoing is true and correct. Executed August 23, 2023, at Seattle, Washington.



BRONYN HEUBACH

EXHIBIT A

Mickie Hazlewood



Received
JUN 26 2023
by JNDLA

June 9, 2023

Turkish Airlines Settlement
C/O JND Legal Administration
P.O. Box 91455
Seattle, Washington 98111
info@tasettlement.com

Subject: Objection to Settlement Agreement *Sholopa et al. v. Turk Hava Yollari A.O. (d/b/a Turkish Airlines) et al.* Case No. 1:20-cv-03294-ALC

To JND Legal Administration,

I hope this letter finds you well. I am writing as a settlement class member in the *Sholopa et al. v. Turk Hava Yollari A.O. (d/b/a Turkish Airlines) et al.* Case No. 1:20-cv-03294-ALC to formally object to the settlement agreement on the grounds that the records indicate I received a refund from Turkish Airlines, while in reality, I have not received any refund.

I have thoroughly reviewed the settlement agreement and the accompanying documentation, including the notices and correspondence provided. However, contrary to the information contained in the records, I can provide evidence that I did not receive a refund from Turkish Airlines as stated.

Attached to this letter is an email correspondence from Turkish Airlines dated July 8, 2020, which clearly indicates that the total amount refunded to me was zero. This email serves as proof that I have not been compensated in any form as mentioned in the settlement agreement.

Based on the above evidence, it is clear that an error has occurred in recording the refund status for my case. Therefore, I respectfully request that you amend the records to reflect the accurate status of my refund and ensure that I receive the complete refund I am entitled to as a settlement class member.

I understand that the settlement agreement has established a specific process for addressing objections. I have followed the provided guidelines and am submitting this objection within the

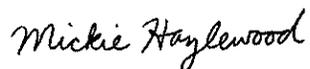
designated time frame. I kindly request that my objection be duly considered and thoroughly reviewed in light of the evidence presented.

Please acknowledge the receipt of this objection letter and provide me with information regarding any further steps I need to take or any additional documentation required to support my objection.

Thank you for your attention to this matter. I trust that the settlement administrator will handle my objection fairly and promptly. If necessary, I am prepared to provide any additional information or attend a hearing to present my case.

I look forward to a satisfactory resolution.

Sincerely,

A handwritten signature in cursive script that reads "Mickie Hazlewood".

Mickie Hazlewood

Fwd: Turkish Airlines - Online Ticket - Cancellation Message

Mickie Hazlewood [REDACTED]

Fri 6/9/2023 11:02 AM

To: Mickie Hazlewood [REDACTED]

CAUTION: This email might have originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Begin forwarded message:

From: [REDACTED]
Date: June 9, 2023 at 9:07:59 AM PDT
To: [REDACTED]
Subject: Fwd: Turkish Airlines - Online Ticket - Cancellation Message

Sent from my iPad

Begin forwarded message:

From: [REDACTED]
Date: July 8, 2020 at 5:13:43 PM PDT
To: [REDACTED]
Subject: Fwd: Turkish Airlines - Online Ticket - Cancellation Message

Sent from my iPad

Begin forwarded message:

From: [REDACTED]
Date: July 8, 2020 at 5:02:23 PM PDT
To: [REDACTED]
Subject: Turkish Airlines - Online Ticket - Cancellation Message

Dear ROBERTA REBER, your ticket has been cancelled. You

[REDACTED]

can find cancellation/refund details below.

Summary

Transaction date:
Thursday, July 9, 2020,
6:00 AM



Booking Reference

Refund after cancellation 100.54 EUR

Journey price breakdown

2 Adult	Fee	1,018 EUR
Taxes and other fees	Non-refundable	0 EUR
Ticket service fee	Non-refundable	0 EUR

Original amount 0 EUR

Total non-refundable amount 100.54 EUR

The total amount to be refunded 0 EUR

Refund method



Master Card 

Payment method

Your cancelation/refund has been carried out for everyone on your reservation. To make changes to the travel insurance you purchased along with your ticket please contact the service provider. You can still have a refund request processed if the credit card used to make payment has been canceled or has expired. If you are no longer with the bank which issued the card, obtain an official letter from the bank explaining this, and present the letter at one of our sales offices. If you are still with the bank which issued the card but you are now using a different card, your refund can be made to this card. For more information please contact our call center or one of our sales offices. This e-mail may contain private or confidential information. The information contained in this e-mail must not be given, communicated or distributed to anyone other than its intended recipients. If you believe you have received this e-mail in error, please inform the sender and delete it and its attachments.

Any
questions?

For more information [click](#).

www.turkishairlines.com



JUN 26 2023

FOLD HERE
U.S. POSTAGE \$1.50
ROC 99
98714 FCM
06/21/23
02
646
9819000115



Turkish Airlines Settlement
C/O JND Legal Administration
~~XXXXXXXXXX~~ 91455
P.O. Box 91455
Seattle, Washington 98111



JUN 26 2023



Mail body: Fw: IMPORTANT NOTICE: ^_Turkish^_ ^_Airlines^_ Class Action Settlement

Sent from Yahoo Mail on Android

Received
JUL 24 2023
by JNDLA

----- Forwarded Message -----

From: "ENRIQUE RICK CHAVEZ" [REDACTED]
To: "Maria Baroi-Chavez" [REDACTED]
Sent: Fri, Jun 2, 2023 at 6:25 PM
Subject: Re: IMPORTANT NOTICE: ^_Turkish^_ ^_Airlines^_ Class Action Settlement

Turkish Airlines Settlement
c/o JND Legal Administration
PO Box 91455
Seattle, WA 98111
Enrique Rick Chavez telephone number [REDACTED]

LAX on to Turkey on to Dhaka Bangladesh via Turkish Airlines
Turkish booking number S5VZ2J
July 9th 2020
Electronic ticket issued

I do not plan on attending the final approval hearing
I object to the Settlement amount that I will receive 10\$ USD.
A 10 dollar cash payout is laughable. With Turkish airlines canceling my flight at the last moment. I had to pay an enormous amount of money for the next available flight to Bangladesh. Where I was living with my family, wife and child. Turkish airlines did not offer an alternative flight, offer to pay the difference with another carrier, or apologize.

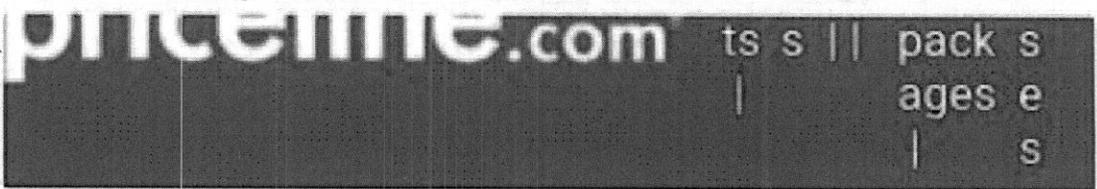
Replacement one way flight with Qatar was \$1709.70
Plus, I had the cost of Turkish visa. \$119 usd. So, if I cancel my flight with Turkish airlines, I am assessed a 30% penalty fee or not even be Allowed a refund. I would like Turkish airlines to pay the difference of my flight at minimum and visa cost totaling \$880 USD. It was such a hassle. The time and money wasted was heartening.

Enrique Rick Chavez



← Maria Chavez's Trip to Dhaka, ...

Replacement ticket



Maria Chavez booked a trip at priceline.com. Here are the details of the trip.

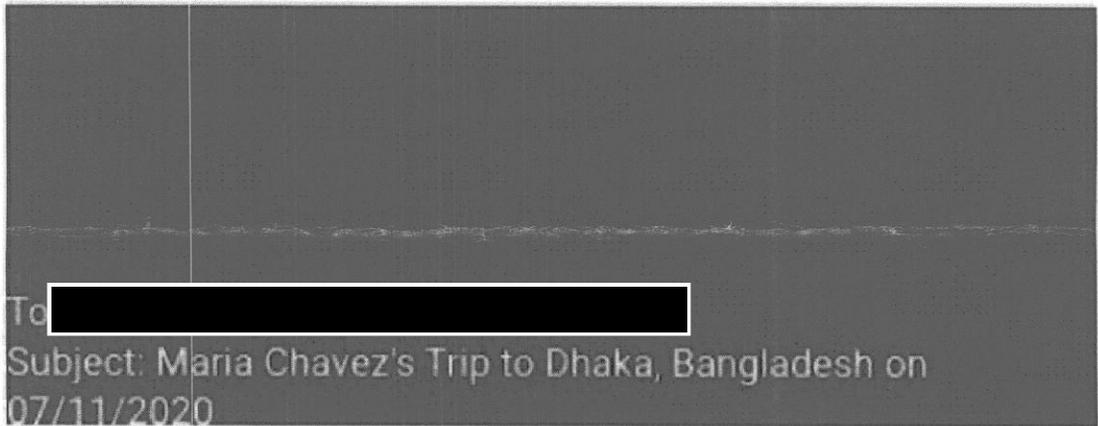
Departing Flight Information

American Airlines	From	To	Aircraft
Flight 2354	Los Angeles Intl Airport (LAX)	Dallas/Fort Worth Intl Airport (DFW)	Airbus A321 Economy Class

311211, 1,231mi Conf #GVAPOW	Airport (LAX) Los Angeles, CA 2020/07/11 - 11:30 AM	Airport (DFW) Dallas, TX 2020/07/11 - 04:32 PM	Class
Qatar Airways Flight 730 14h 30m, 7,913mi Conf #KQLOFS	From Dallas/Fort Worth Intl Airport (DFW) Dallas, TX 2020/07/11 - 06:10 PM	To Doha Intl Airport (DOH) Doha, Qatar 2020/07/12 - 04:40 PM	Aircraft Airbus A350- 1000 Economy Class
Qatar Airways Flight 638 5h 5m, 2,432mi Conf #KQLOFS	From Doha Intl Airport (DOH) Doha, Qatar 2020/07/12 - 06:05 PM	To Hazrat Shahjalal Intl Airport (DAC) Dhaka, Bangladesh 2020/07/13 - 02:10 AM	Aircraft Boeing 777- 300ER Economy Class

Passenger Information

Passenger 1: Enrique Chavez **Delivery:** Electronic tickets will be issued for this flight



To: [Redacted]
Subject: Maria Chavez's Trip to Dhaka, Bangladesh on 07/11/2020

- 
Delete
- 
Archive
- 
Move
- 
Forward
- 
More



2:11



← Priceline - Checkout: D

G 11991w calle hermosa



3

Review & Book

You picked a great flight!
If your plans change, cancel online for free in the next 24 hours.

✈ Sat, Jul 11

Los Angeles, CA - Dhaka, Bangladesh

✓ Free Cancellation within 24 hours

✈✈ Multiple Airlines Economy Class

11:30a LAX — 2:10a DAC 2 Stops 25h 40m

Replacement ticket

Cost per person \$1709.70

One-way ticket

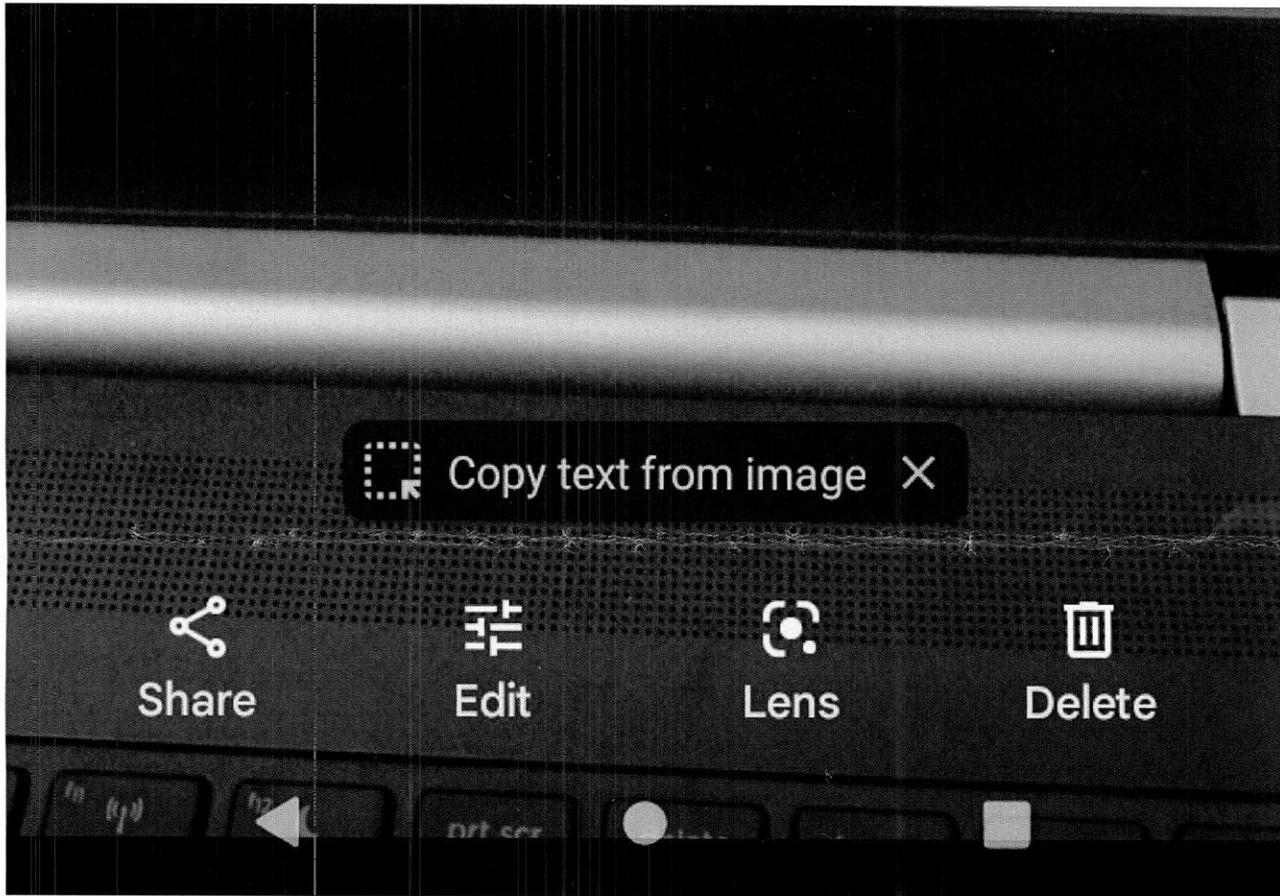
Number of travelers X1

Total charges **\$1709.70**

Or as low as \$151/month

[Learn more](#)

Prices in USD. Prices include all taxes and fees charged by Priceline.



1:46 ↓ ↓



content://com.yahoo.mc



TURKISH AIRLINES 

A STAR ALLIANCE MEMBER 

THIS DOCUMENT IS AUTOMATICALLY GENERATED. PLEASE DO NOT RESPOND TO THIS MAIL.

Dear **ENRIQUERICK CHAVEZ**

Detailed information about your booking is shown below.

Thank you for choosing Turkish Airlines.

Reservation Code **S5VZ2J**

Your electronic ticket is issued.

Passenger(s) and Travel Preferences

Name and Surname	Electronic Ticket Number
Bay ENRIQUERICK CHAVEZ	2352410957508

Ticketed Segments

From To	Date	Flight	Departure	Arrival	Class	Cabin
Los Angeles/LAX Istanbul/IST	09 July	TK10	18:50	17:50	O	Economy
Istanbul/IST Dakka Shahjalal/DAC	11 July	TK712	18:25	04:55	O	Economy

You can either call **444 0 849 / 0850 333 0 849** Turkish Airlines Call Center 24/7 (24hours/7days).

CALL CENTER TICKET SALES

444 0 849 / 0850 333 0 849 (24hours 7days)

- Your ticket has been issued as an electronic ticket. You will not receive a paper ticket.
- For domestic flights; an identification card (passport ,driving license,personal identity card ,marriage certificate) that belongs to passenger must be presented at check-in counter/boarding.
- For international flights; an identification card and passport that belongs to passenger must be presented at check-in counter/boarding.
- The invoice which has financial validity can be downloaded from <http://ebiletatura.turkishairlines.com> 72 hours after the ticket issue time. Invoices of tickets issued by agencies are provided from agencies.
- For the pure domestic electronic tickets including AnadoluJet flights if stop over made every segments' rules shall apply seperately. For transfer flights with combination of Turkish Airlines and AnadoluJet than Turkish Airlines' rules shall apply.
- For domestic flights; if reservations will be cancelled 12 hours prior to the departure %30 percent of the applicable fare will be charged as a penalty for refunds. No refunds can be made after departure.
- For international flights; Penalty clause of the fare rule shall apply for cancellation/refunds and No-shows.
- For international flights, it is recommended to arrive at airport 2(two) hours before the scheduled departure time of your flight. For domestic flights this duration is 1(one) hour.
- The Latest Time to Collect the Boarding Pass: For domestic flights: 45 minutes before the scheduled departure time of your flight. For international flights: 60 minutes before the scheduled departure time of your flight.
- Aircraft type may be changed for operational reasons.

General Baggage Information



07/11 Turkish Airlines Istanbul Card	953.10	10
07/07 Surf Yogurt Ventura CA Card	-12.65	10
07/09 Qatar Air	-1,709.70	8

turkey
visa
119.00
total
\$ 875.60

ticket Difference
\$ 756.60 +

- Your name, address, telephone number, and, if represented by counsel, the name, address, and telephone number of your counsel;
- Your flight numbers for all flights at issue in this settlement, the flight dates, and the flight route (destination and origin airports);
- A statement whether you intend to appear at the Final Approval Hearing, either in person or through counsel;
- All grounds for your objection, accompanied by any legal support for the objection known by you or your counsel;
- Copies of any papers, briefs, or other documents upon which the objection is based or upon which you or your counsel intend to rely; and
- Your handwritten signature.

You must sign your own objection. Attorneys' signatures on objections will not be accepted.

Sent from Yahoo Mail on Android

On Sat, Jun 3, 2023 at 12:55 AM, info@tasettlement.com
<info@tasettlement.com> wrote:

Dear ENRIQUERICK CHAVEZ,

Unique ID: D2VFKU5BH6
PIN: 25972857

COURT ORDERED NOTICE

Sholopa et al. v. Turk Hava Yollari A.O. (d/b/a Turkish Airlines) et al.
Case No. 1:20-cv-03294-ALC

If you purchased a flight on Turkish Airlines scheduled to fly to or from the United States between March 1, 2020 and December 31, 2021 and your flight was cancelled by Turkish Airlines, you may be eligible for benefits from a class action settlement.

A federal court authorized this notice. This is not a solicitation from a lawyer.

A Settlement has been reached in a class action lawsuit. In the lawsuit, Plaintiffs allege Turk Hava Yollari A.O. (d/b/a Turkish Airlines) (‘‘Turkish Airlines’’) breached its General

Conditions of Carriage (â€œGCCâ€) by failing to refund them for cancelled flights at all or within a reasonable amount of time. Turkish Airlines maintains that it did not breach the GCC, that it did provide refunds within a reasonable amount of time particularly given Covid-19â€™s impact on Turkish Airlinesâ€™ operations and the airline industry generally, and it denies that it did anything wrong. The Court has not decided who is right. Instead, the Parties agreed to a Settlement. Defined terms (with initial capitals) used herein and not otherwise defined have the same meaning as set forth in the Settlement Agreement.

Who is included? The Settlement Class includes all United States residents who purchased tickets for travel on a Turkish Airlines flight scheduled to operate to, from, or within the United States between March 1, 2020 and December 31, 2021 whose flights were cancelled by Turkish Airlines.

What are the Settlement Terms? Under the Settlement, Settlement Class Members who have already received a refund from Turkish Airlines and who submit a Claim Form will have the option to elect either (1) the Cash Option: \$10.00 USD per person, or (2) the Voucher Option: a Voucher for future travel on Turkish Airlines in the amount of \$45.00 USD. Settlement Class Members who have not, to date, received a refund (but are entitled to one) can request a refund on the Claim Form and, upon submission of a Valid Claim, Turkish Airlines will pay (i) the full amount of the refund, and (ii) an additional Interest Payment of one percent (1%) of the unused ticket price, or in the case of partially used tickets, one percent (1%) of the price of the unused flight segment (i.e., a 101% refund). Settlement Class Members may submit a Claim Form through the mail or at www.TASettlement.com. The deadline to file a Claim Form is August 18, 2023.

Your Other Options. If you do not want to be legally bound by the Settlement, you must exclude yourself or â€œopt outâ€ by July 17, 2023. If you do not opt out, you will release Claims that were or could have been made against Turkish Airlines related to this case. If you stay in the Settlement, you may object to it by July 17, 2023. The Long Form Notice on the website explains how to opt out or object. The Court has scheduled a hearing on August 24, 2023 to consider whether to approve the Settlement. You can appear at the hearing, but you do not have to do so.

For more information, including the Long Form Notice and information about attorneysâ€™ fees being sought, visit www.TASettlement.com or call toll-free 1-855-678-0528.

To unsubscribe from this list, please click on the following link: [Unsubscribe](#)

EXHIBIT B-1



TURKISH AIRLINES SETTLEMENT

**Exclusion Requests
(as of August 21, 2023)**

TIMELY REQUESTS FOR EXCLUSION

#	Name
1	NANCYHESHAM ALSHELLEH
2	KATHERINE MARIE ANDERSON
3	ALYSSA NICOLE BEDARD
4	VICKEY R CHRISTOPHER
5	WILLIE RAY CHRISTOPHER
6	MUMUNE COSKUN
7	MARIKA CVETKOVSKA
8	MARQUESALLAN DUNHAM
9	KHOSRO FARHAD
10	BRIANNA GAIL GEORGIE
11	VERA GOLUBTSOVA
12	BRENDALOU HAMMONDS
13	RONNIELYNN HAMMONDS
14	MICHELE MYONG
15	JOANNE NEAL
16	JAMES ANTHONY NEAL
17	SEMEEN PARVAIZ
18	TEENAMARIE PHILLIPS
19	EMILY ANNE PIQUES
20	VALENTINA RAIKO
21	ZACHARYDOYLE ROWLEY
22	BEATA SAJGO
23	MAHTA SAMIZADEH
24	RACHEL SCHEMENAUR
25	RISHAT SITDIKOV
26	LILIYA SITDIKOVA
27	ISAAC SSEMAGANDA
28	LINA VASILE
29	GHEORGHE VASILE
30	ASUMAN YILMAZ

EXHIBIT B-2



TURKISH AIRLINES SETTLEMENT
Exclusion Requests
(as of August 21, 2023)

TIMELY REQUESTS FOR EXCLUSION: NON-CLASS MEMBER

#	Name
1	ROBERTA AGUIARI
2	SEZAI ALTINKALEM
3	HAFIZEAYTUL ALTINKALEM
4	MERVA BILGINER
5	PATRICIA BROSSMANN
6	MEYRA CEYLAN
7	ASEFEMIR COBAN
8	YASEMIN DORMEN
9	DRAGAN JEROSIMOVIC
10	NESLIN KOSEOGLUCOBAN
11	MARIA MATSI
12	DALIA MOHAMEDAYMANSALAMA AHMED
13	MARIJA NIKOLOVSKA
14	ATHANASIOS PAPADOPOULOS
15	ALBERTO PONZINI
16	MARCO PONZINI
17	AMINA RUZDIC
18	FILIP STOJANOVSKI
19	ANETA SURKOVA
20	CRISTINA VISCONTI
21	GIORGIO ZUCCHI
22	LUCA ZUCCHI

LATE REQUESTS FOR EXCLUSION

#	Name
1	LEILANI DIMATULAC