

4. A.B. Data has also been appointed as notice, claims, and/or settlement administrator in hundreds of high-volume consumer, civil rights, insurance, antitrust, ERISA, securities, and wage and hour class action cases. Anya Verkhovskaya previously submitted a declaration executed on February 4, 2014 (“Declaration of Anya Verkhovskaya on Behalf of A.B. Data, Ltd. Regarding Notice of Pendency of Class Actions”) outlining A.B. Data’s credentials and describing the proposed Notice of Pendency in this Action. More information on A.B. Data’s qualifications and experience can be found on our website at www.abdataclassaction.com. An updated profile of A.B. Data’s background and capabilities, including representative case and client lists, is included as **Exhibit B**.

5. Eric Miller previously submitted declarations executed on February 13, 2015 (“Notice of Pendency Declaration”) and March 5, 2015 (“Supplemental Notice of Pendency”), reporting that A.B. Data implemented the Notice of Pendency and Supplemental Notice of Pendency in this Action.

Notice Program Overview

6. The proposed Notice Program uses customary procedures that have been widely adopted in class actions with a comprehensive list of class member data, including the previous notice programs in this Action.

7. This Declaration summarizes the proposed Notice Program which includes direct notice via U.S. Mail and email as described below, paid media (digital and social media), earned media, a website, and a call center. The Notice Plan, attached as **Exhibit C**, provides more details.

Direct Notice

8. The proposed Notice Program includes direct notice by First-Class U.S. mail and email to all members of the Class for whom a mailing or email address is known.

9. As reported in the Notice of Pendency and Supplemental Notice of Pendency Declarations, A.B. Data provided notice in this Action to mailing lists comprised of:

- a. Records from NorthShore University HealthSystem (“NorthShore”) of non-Medicare patients that received services at NorthShore from January 1, 2000 through October 5, 2014 (“ENH Data”),
- b. Records from A.B. Data’s proprietary database of third-party payors and their representatives (“TPP Mailing List”), and
- c. Records of additional self-funded group plans provided by Counsel (“Supplemental TPP Mailing List”).

10. NorthShore will provide more detailed contact information and a refined list of potential members of the Class’s names and address records, including payment information for all the individuals and entities who purchased inpatient hospital services from NorthShore (or Evanston Northwestern Healthcare Corporation (“ENH”)) during the Class Period (“Class List”). The Class List will encompass the entire universe of potential members of the Class.

11. A.B. Data will coordinate receipt of the Class List and will process the data to ensure adequate address formatting and match them (as applicable) with any unique Identification Numbers¹ in the existing database (or assign them a new Identification Number as needed). Duplicate records will be removed.

12. A.B. Data has numerous control systems and procedures in place, that it believes meet or exceed relevant industry standards, to securely handle class member data. The organization accepts responsibility for the security of class member information and claimant data; accurate calculation of claims pursuant to a Court-approved Plan of Allocation, subject to the

¹ The Identification Number is printed and bar-coded on all related correspondence to facilitate processing and tracking undeliverable notices.

guidance of Lead Counsel; and accurate distribution of funds pursuant to Court order. A.B. Data maintains adequate insurance in the case of errors, which includes: (a) professional liability errors and omissions insurance coverage; (b) a fidelity bond for employee dishonesty losses (plus additional computer fraud and wire transfer communication fraud coverages); and (c) network and information security liability coverage.

13. For members of the Class with a mailing address, A.B. Data will send the Short-Form Notice, formatted as a postcard (“Postcard Notice”) to the updated list of potential members of the Class via U.S. Mail.

14. Prior to mailing, A.B. Data will standardize and update all mailing addresses through the Coding Accuracy Support System (CASS) and the United States Postal Service (“USPS”) National Change of Address (“NCOA”) database.

15. All Postcard Notices that are returned as undeliverable with forwarding addresses provided by USPS will be processed, updated in the case-specific database, and re-mailed. For Postcard Notices returned without any forwarding addresses, A.B. Data will attempt to obtain updated addresses for the addressees concerned using proprietary subscription databases and, in instances where updated addresses are found, re-mail the applicable Postcard Notices.

16. For members of the Class identified through NorthShore’s records with an email address available, A.B. Data will send the Short-Form Notice via email (“Email Notice”). A.B. Data implements certain best practices when disseminating email notice, such as not using email attachments and certain trigger words to avoid SPAM and junk filters, to maximize deliverability.

Paid Media Components

17. To supplement the direct notice, A.B. Data designed a paid media plan (including digital and social media advertising) to reach those who do not receive a Short-Form Notice via

mail or email. Paid media advertising is guaranteed to appear and allows control over the content, timing, and positioning of the message.

Digital & Social Media

18. Digital and social media are included in the Notice Plan to reach potential members of the Class. A.B. Data recommends advertising on a variety of websites and social media applications, maximizing ad exposure to potential members of the Class.

19. Internet advertising allows the viewer to click on a banner advertisement and instantly be directed to the settlement website to file a claim and/or obtain additional information about their rights.

20. Social media provides an opportunity for potential members of the Class to not only link to the Settlement Website, but also seamlessly share ads and information about the Settlement with their family, friends, community, and related social networks. Impressions served to social media users can be highly targeted, specifically reaching those who have expressed an interest in information relevant to the case.

21. All digital and social media ads will include images appropriate for this case and target audience and an embedded link to the case-specific website to increase the ad visibility and click-through rate. Banner and newsfeed ads will be placed in premium positions on websites and social media sites, so they are easily seen when viewers first open the website page or application. Sample banner ads are provided within the attached Notice Plan (**Exhibit C**).

22. A minimum 4 million gross impressions² will be delivered in Illinois and nationally (to reach those who may relocated out-of-state). Ads will appear across desktop, tablet, and mobile devices for 30 days on Google Display Network, YouTube, Facebook, Instagram. Google Display

² Gross (targeted) impressions are the duplicated sum of audiences of all media vehicles containing the notice.

Network places digital ads on websites, blogs, and other properties within its own network and over 2 million other websites across the Internet. YouTube is an online video sharing and social media platform that has over 200 million users in the United States. Facebook.com is a free, global social networking website that helps people communicate with friends, family, and coworkers. Instagram is a photo and video sharing social networking application with highly engaged users who click on posts and ads.

23. Targeted digital and social media advertising will also be used. Tactics may include:

Strategy	Rationale
Geographic	Ads geo-targeted to Illinois and nationally (to reach those who may have relocated).
Mobile – In-App	Ads targeted to individuals, including those from available data, while they are using relevant mobile applications. Mobile applications could include health apps, medical-related apps, and others.
Mobile – Websites	Ads targeted to phones and tablets whose users are visiting websites that are contextually relevant or websites being visited by relevant users.
Contextual/Channel	Ads targeted to individuals who visited websites with relevant content and context, such as medical topics, health, doctors, and others.
Behavioral	Ads targeted to user IDs across the Internet whose owners have shown activity (e.g., clicked through to the settlement website) in the past or registered on the case website.
Predictive (Look-Alike) Modeling	Using “look-alike” modeling to target ads to user IDs whose owners have strong similarities to users who have previously “clicked through” to the case website.

Strategy	Rationale
Class Lists	Ads targeted to available lists of known or potential members of the Class.

24. The digital campaign will be optimized to adjust for audiences and demographic groups that are most responsive and engaged and maximize exposure across websites that are best driving potential members of the Class to the case-specific Settlement Website.

25. To make it easy for potential members of the Class to locate the Settlement Website, sponsored search listings will be purchased to appear on Google, the most highly visited search engine, and/or other search partners. When a person uses a specific target phrase and/or keyword in a search engine to search for information, the link to the settlement website may appear on the search result pages. Sample keyword terms or phrases may include “NorthShore Settlement,” “ENH class action,” “NorthShore class action lawsuit,” “Evanston hospital settlement,” “Northshore inpatient hospital class,” plus many others.

26. A.B. Data’s digital media team is certified in Google Ads Display, Google Ads Search, Google Analytics, Facebook, The Interactive Advertising Bureau (“IAB”)³ Digital Media Buying & Planning, IAB Digital Media Sales, and Hootsuite Social Marketing.

Earned Media

27. A.B. Data will distribute a news release via PR Newswire’s US1 Newswire to help the case gain more attention from the media and potential members of the Class. The press release will reach traditional media outlets (television, radio, newspapers, magazines), news websites, and journalists nationwide.

³ The Interactive Advertising Bureau (“IAB”) is an American advertising business organization that develops industry standards, conducts research, and provides legal support for the online advertising industry.

28. News about the settlement will also be broadcast to the news media via X (formerly known as Twitter). It will be tweeted from PR Newswire's and A.B. Data's X (Twitter) accounts to thousands of media outlets, journalists, and other followers.

Website

29. A.B. Data will update and maintain a case-specific Settlement Website, www.NorthshoreAntitrustLitigation.com, to ensure members of the Class can easily access relevant case information and updates. The previously used website, www.EvanstonNorthwesternHealthcareAntitrustCase.com, will redirect to the new Settlement Website. The website is simple to navigate and provides, among other things, a summary and background about the case, important deadlines, contact information, frequently asked questions, and members of the Class's rights and options. Members of the Class will continue to be able to access and download copies of key documents, including the Long-Form Notice, Claim Forms, Court documents, and the Settlement Agreement. A claims-filing portal on the Settlement Website will allow members of the Class to submit their Claim Form online.

Toll-Free Telephone Number and Email Address

30. A.B. Data will update and maintain the case-specific toll-free telephone number, 800-952-3716, to support the Action, with live operators available during business hours and interactive voice response ("IVR") technology available 24/7. The telephone number was established on December 5, 2014. The call center provides the following services:

- a. Inbound toll-free telephone line,
- b. Interactive-voice-response system,
- c. Live operators during business hours,
- d. Call scripts developed by our experts and approved by Lead Counsel, and

e. Detailed reporting.

31. The automated attendant answers phone calls and presents callers with a series of choices in response to basic questions. If callers require further assistance, they have the option to transfer to a live operator during business hours. Any messages received after business hours will be returned the following business day.

32. A dedicated e-mail address will also be established to address questions and provide information about the Settlement.

33. The toll-free telephone number, email address, and Settlement Website address will be displayed in the Notices and Claim Forms. Both the toll-free number and email address will appear on the Settlement Website.

Settlement and Claims Administration

34. A.B. Data will provide claims distribution and administration services, including determining each member of the Class's distribution amount and preparing and sending payments to eligible members of the Class.

35. A.B. Data will also provide settlement administration services, including setting up, administering, and preparing a tax return for the qualified Settlement Fund ("QSF").

36. Members of the Class who wish to be potentially eligible to receive a payment from the Settlement Fund will be required to complete and submit a properly executed Claim Form along with any required supporting documents either by mail or online through the Settlement Website such that it is postmarked (if mailed) or received no later than the claims-submission deadline established by the Court. A.B. Data will review each Claim upon receipt to verify that all required information was provided. Supporting documents provided with each Claim will be reviewed for authenticity and compared to the information provided in the Claim to verify the

Claimant's identity and the purchasing information. A.B. Data will process each Claim in accordance with the Court-approved Settlement Agreement and Plan of Allocation and/or relevant Court orders.

37. If a Claim is determined to be defective, A.B. Data will send a deficiency notification to the Claimant, via letter or email, that describes why the Claim is deficient and including, where applicable, what is necessary to cure the deficiency. The deficiency notification will also advise Claimants how much time they have to submit the appropriate information and/or documentary evidence to complete/cure their Claim. If the deficiency in the Claim is not cured, the Claim will be recommended for rejection (in whole or in part). The deficiency notification will also advise Claimants of their right to contest A.B. Data's administrative determination with respect to their Claim.

38. After the Claims (and responses to deficiency notifications) have been fully processed, quality assurance reviews performed, and final administrative determinations have been made as to which Claims are valid, A.B. Data will distribute the net Settlement proceeds to eligible members of the Class upon Court approval.

39. A.B. Data will process each Claim in accordance with the Court-approved Settlement Agreement and Plan of Allocation and/or relevant Court orders.

40. After quality assurance reviews are performed and final administrative determinations have been made, A.B. Data will distribute the net Settlement proceeds to eligible members of Class upon Court approval.

41. Eligible members of the Class will be provided an opportunity to request their payment by check or digital payment. Distributions from the net Settlement proceeds will be sent to eligible members of the Class based on their preference with a specified period for each

Claimant to cash their payment (typically 90 or 120 days). For any payments that are not cashed, A.B. Data will conduct an outreach campaign to encourage cashing and provide Claimants with reissued checks where applicable.

42. The procedure described above is the standard claims administration process for class action settlements handled by A.B. Data.

Form and Content of Notice and Claim Forms

43. A detailed Long-Form Notice, Short-Form (Postcard) Notices, and Claim Forms, attached as Exhibits D through G, will be available on the Settlement Website. The Notices include all required information about members of the Class's rights and options and comply with the requirements for notices in the Federal Rules of Civil Procedure Rule 23. They are designed to encourage readership and understanding in a well-organized and reader-friendly format.

44. A Short-Form Notice in the form of a postcard or email will be used to provide notice of the proposed Settlement. The Short-Form Notice provides a clear, plain language summary about the litigation, proposed Settlement, and members of the Class's rights and options. This notice also includes the Settlement Website address and toll-free telephone number, so members of the Class can obtain additional details about the case and background information about the Action.

45. A detailed Long-Form Notice will be available on the case website and includes more substantial information about the Action and how members of the Class can act on their rights and options, such as how members of the Class can submit claims online or via mail. The Long-Form Notice is also written in plain language, contains all necessary information, and uses a question-and-answer format to make it easier for potential members of the Class to find and understand the relevant information.

46. The Claim Forms and Long-Form and Short-Form Notices will be available in Spanish.

Conclusion

47. It is my opinion that the proposed Notice Program uses a strategic and contemporary method to deploy notice to the Class and is adequate and reasonable to effectively reach the members of the Class. The plain language notices will capture potential members of the Class's attention and provide important information in a way that helps them understand their rights and options. The proposed Notice Program, with comprehensive direct notice and supplemental paid and earned media, is designed to reach over 80% of the Class and conforms to the standards employed by A.B. Data in notification programs designed to reach potential class members. This Notice Program is the best practicable approach to reach members of the Class in this Action and fully satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure and due process.

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

Executed this 12th day of January 2024.



Elaine Pang

EXHIBIT A



Elaine Pang is Vice President of Media with A.B. Data's Class Action Administration division and has over sixteen years of expertise in development of legal notice plans. She has directed a wide range of notice programs involving media planning, media buying, research, creative design process, and data analysis, resulting in the implementation of effective and efficient programs to reach potential class members. Ms. Pang has been involved in some of the largest and most complex legal notification plans in both domestic and international regions. Her programs satisfy due process requirements, as well as all applicable state and federal laws, and they adhere to the guidelines set forth in the *Manual for Complex Litigation, Fourth Edition* and by the Federal Judicial Center (FJC), as well as applicable state laws.

Ms. Pang is also a certified professional in IAB Digital Media Buying & Planning, IAB Media Sales, Hootsuite Social Marketing, Google Digital Sales, Google Analytics, Google AdWords, and Market Motive Internet Marketing Fundamentals. She also served as an IAB exam committee member, a group of 12-14 industry experts who work to ensure that certification exams stay current with the industry's changing ecosystem by developing exam questions, reviewing exam content, and advising on the passing score of the exam. She holds a Bachelor of Science in marketing from The Pennsylvania State University and earned her MBA from Strayer University.

Prior to her professional experience in the class action notice and claims administration industry, Elaine established a strong portfolio working with many top brands including Marriott, General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox.

CASE EXPERIENCE

Ms. Pang has been instrumental in her involvement with developing, implementing, and analyzing media measurements across domestic and international multichannel platforms for notice programs. A partial listing of her case work is provided below.

CASE NAME	CASE NUMBER	LOCATION
<i>In re Cattle and Beef Antitrust Litigation, et al. (In re DPP Beef Litigation)</i>	20-cv-01319 JRT-HB	United States District Court for the District of Minnesota
<i>Sheet Metal Workers Local No. 20 Welfare and Benefit Fund, et al. v. CVS Pharmacy, Inc., et al.</i>	16-046 WES and 16-447 WES	United States District Court for the District of Rhode Island
<i>Daniel Berman, et al. v. Freedom Financial Network, LLC, et al.</i>	18-cv-01060-YGR	United States District Court for the Northern District of California
<i>Hoffman v. City of Los Angeles</i>	BC672326	Superior Court of the State of California, County of Los Angeles



<i>In Re: Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litigation</i>	2:13-md-02445-MSG	United States District Court for the Eastern District of Pennsylvania
<i>Stacy Dorcas v. Aterian, Inc.</i>	CIVSB2222117	Superior Court of the State of California for the County of San Bernardino
<i>In re Term Commodities Cotton Futures Litigation</i>	12-cv-5126	U.S. District Court for the Southern District of New York
<i>Lincoln Adventures, LLC, et al. v. Those Certain Underwriters at Lloyd's, London Members of Syndicates, et al.</i>	2:08-cv-00235-CCC-JAD	U.S. District Court for the District of New Jersey
<i>Sonterra Capital Master Fund Ltd., et al. v. Barclays Bank PLC, et al.</i>	15-cv-3538	U.S. District Court for the Southern District of New York
<i>In re Xyrem (Sodium Oxybate) Antitrust Litigation</i>	20-md-02966-RS	U.S. District Court for the Northern District of California
<i>In re Zetia (Ezetimibe) Antitrust Litigation</i>	2:18-md-2836	U.S. District Court for the Eastern District of Virginia Norfolk Division
<i>In re Bank of Nova Scotia Spoofing Litigation</i>	3:20-cv-11059 (MAS) (LHG)	U.S. District Court for the District of New Jersey
<i>Solomon vs. Sprint Corporation</i>	1:19-cv-05272-MKV	U.S. District Court for the Southern District of New York
<i>In re European Government Bonds Antitrust Litigation</i>	1:19-cv-02601	U.S. District Court for the Southern District of New York
<i>In re Broiler Chicken Antitrust Litigation</i>	1:16-cv-08637	U.S. District Court for the Northern District of Illinois
<i>In re: Broiler Chicken Antitrust Litigation (End-User Consumer Action)</i>	1:16-cv-08637	U.S. District Court for the Northern District of Illinois
<i>In re: Broiler Chicken Antitrust Litigation – Commercial & Institutional Indirect Purchaser Plaintiff Actions</i>	1:16-cv-08637	U.S. District Court for the Northern District of Illinois
<i>Budicak, Inc. et al. v. Lansing Trade Group, LLC et al.</i>	2:19-cv-02449	U.S. District Court for the District of Kansas
<i>In re HIV Antitrust Litigation</i>	3:19-cv-02573-EMC	U.S. District Court for the Northern District of California
<i>In re Namenda Indirect Purchaser Antitrust Litigation</i>	1:15-cv-6549	U.S. District Court for the Southern District of New York
<i>In re Pork Antitrust Litigation</i>	No. 0:18-cv-01776-JRT-HB	U.S. District Court District of Minnesota
<i>In re Pork Antitrust Litigation (Indirect Purchaser Actions)</i>	No. 0:18-cv-01776-JRT-HB	U.S. District Court District of Minnesota
<i>Laydon v. Mizuho Bank, Ltd., et al.</i>	12-cv-3419	U.S. District Court for the Southern District of New York
<i>In re Opana ER Antitrust Litigation</i>	1:14-cv-10150	U.S. District Court for the Northern District of Illinois
<i>Christopher Julian, et al. v. TTE Technology, Inc.</i>	3:20-CV-02857-EMC	U.S. District Court Northern District of California
<i>In re Flint Water Cases</i>	5:16-cv-10444-JEL-EAS	NA



<i>Automobile Antitrust Cases I and II</i>	JCCP Nos. 4298 and 4303, Master File No. 19-md-02878	Superior Court of the State of California for the County of San Francisco
<i>Smith v. FirstEnergy Corp., et al.</i>	2:20-cv-3755	U.S. District Court for the Southern District of Ohio
<i>Fund Liquidation Holdings LLC. V. Citibank, N.A., et al.</i>	1:16-cv-5263 (AKH)	U.S. District Court for the Southern District of New York
<i>In re: Generic Pharmaceuticals Pricing Antitrust Litigation</i>	2:16-MD-02724	U.S. District Court for the Eastern District of Pennsylvania
<i>Sullivan, et al. v. Barclays plc, et al.</i>	13-cv-2811 (PKC)	U.S. District Court for the Southern District of New York
<i>Dennis, et al. v JP Morgan Chase & Co., et al.</i>	16-cv-06496 (LAK)	U.S. District Court for the Southern District of New York
<i>Staley, et al. v. Gilead Sciences, Inc., et al.</i>	3:19-cv-02573-EMC	U.S. District Court for the Northern District of California
<i>In Re Ranbaxy Generic Drug Application Antitrust Litigation</i>	19-md-02878	U.S. District Court for the District of Massachusetts
<i>In re Capacitors Antitrust Lawsuit</i>	3:17-md-02801-JD	U.S. District Court for the Northern District of California
<i>In Re: Johnson & Johnson Sunscreen Marketing, Sales Practices and Products Liability Litigation</i>	3015	U.S. District Court for the Southern District of Florida
<i>In re Citrus Canker Litigation</i>	03-8255 CA 13	Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida
<i>Hill-Green v. Experian Information Solutions, Inc.</i>	3:19-cv-00708	U.S. District Court for the Eastern District of Virginia
<i>Benson Githieya v. Global Tel Link Corp.</i>	1:15-CV-00986-AT	U.S. District Court for the Northern District of Georgia
<i>Bowen v. UPMC Settlement</i>	GD-21-002075	Allegheny Cty. Ct. Com. Pl.
<i>The Roman Catholic Diocese of Rockville Centre, New York</i>	20-12345	U.S. District Court for the Southern District of New York
<i>The Roman Catholic Church for the Archdiocese of New Orleans</i>	20-10846	U.S. Bankruptcy Court, Eastern District of Louisiana
<i>In re Roundup Products Liability Litigation</i>	3:16-md-02741-VC	U.S. District Court for the Northern District of California
<i>In re Boy Scouts of America and Delaware BSA, LLC</i>	20-10343	U.S. Bankruptcy Court for the District of Delaware
<i>Krueger v. Wyeth Inc, et al.</i>	3:03-cv-02496-JAH-MDD	U.S. District Court for the Southern District of California
<i>Hamm v. Sharp Electronics Corporation</i>	5:19-cv-00488	U.S. District Court for the Middle District of Florida
<i>In Re: PG&E Corporation</i>	19-30088	U.S. District Court for the Northern District of California
<i>In re Chinese-Manufactured Drywall Products Liability Litigation</i>	2:09-md-02047	U.S. District Court for the Eastern District of Louisiana
<i>Colorado Attorney General CenturyLink Settlement</i>		
<i>The Hospital Authority of Metropolitan Government of Nashville and Davidson County v. Momenta Pharmaceuticals, Inc.</i>	15-CV-01100	U.S. District Court for the Middle District of Tennessee



<i>Freeman v. Grain Processing Corporation</i>	13-0723	Supreme Court of Iowa
<i>Culler v. Multi-State Lottery Association</i>	LACL136787	Iowa District Court for Polk County
<i>In re LIBOR-Based Financial Instrument Antitrust Litigation</i>	11-MD-2262	U.S. District Court for the Southern District of New York
<i>In re Domestic Airline Travel Antitrust Litigation</i>	2656	U.S. District Court for the District of Columbia
<i>MSPA Claims 1, LLC v. IDS Property Casualty Insurance Company</i>	1:16-CV-21040	U.S. District Court for the Southern District of Florida
<i>Speaks v. U.S. Tobacco Cooperative, Inc.</i>	5:12-CV-729-D	U.S. District Court for the Eastern District of North Carolina
<i>Jabbari v. Wells Fargo & Co.</i>	3:15-cv-02159	U.S. District Court for the Southern District of California
<i>United Desert Charities, et al. v. Sloan Valve Company, et al.</i>	12-CV-06878	U.S. District Court for the Central District of California
<i>In re: Volkswagen "Clean Diesel" MDL</i>	15-MD-2672-CRB	U.S. District Court for the Northern District of California
<i>In re: Automotive Parts Antitrust Litigation</i>	12-md-02311	U.S. District Court for the Eastern District of Michigan
<i>In re Municipal Derivatives Antitrust Litigation</i>	MDL No. 1950, No. 08-02516	U.S. District Court for the Southern District of New York
<i>In re: Oil Spill by the Oil Rig "Deepwater Horizon" in Gulf of Mexico</i>	MDL 2179	U.S. District Court for the Eastern District of Louisiana
<i>Muscarella v. Commonwealth of Pennsylvania</i>	10 F.R. 2011	Commonwealth Court of Pennsylvania
<i>Precision Associates Inc. v. Panalpina World Transport, et al.</i>	8-cv-00042	U.S. District Court for the Eastern District of New York
<i>Mirakay, et al. v. Dakota Growers Pasta Co. Inc., et al.</i>	3:13-cv-04429	U.S. District Court for the District of New Jersey
<i>Imran Chaudhri v. Osram Sylvania Inc.</i>	2:11-cv-05504	U.S. District Court for the District of New Jersey
<i>Trammell v. Barbara's Bakery Inc.</i>	12-cv-02664	U.S. District Court for the Northern District of California
<i>Independent Foreclosure Review</i>		Department of Justice
<i>In Re: TFT-LCD (Flat Panel) Antitrust Litigation</i>	MDL No. 1827	U.S. District Court, Northern District of California, San Francisco Division
<i>In re: Sony Gaming Networks and Customer Data Security Breach Litigation</i>	11-MD-2258	U.S. District Court for the Southern District of California
<i>Koyle v. Level 3 Communications, Inc.</i>	01-0286-S-BLW	U.S. District Court for the District of Idaho
<i>In Re: Korean Air Lines Co., Ltd. Antitrust Litigation</i>	07-01891	U.S. District Court for the Central District of California
<i>In re: DRAM Antitrust Litigation</i>	MDL No. 1486	U.S. District Court for the Northern District of California
<i>In re: Transpacific Passenger Air Transportation Antitrust Litigation</i>	07-CV-5634-CRB, MDL 1913	U.S. District Court for the Northern District of California
<i>In re M3Power Razor System Marketing & Sales Practices Litigation</i>	05-cv-11177	U.S. District Court for the District of Massachusetts



<i>In re: NYC Bus Tour Antitrust Litigation</i>	13-cv-0711	U.S. District Court for the Southern District of New York
<i>In re: Electronic Books Antitrust Litigation</i>	1:11-md-02293	U.S. District Court for the Southern District of New York
<i>Scharfstein v. BP West Coast Products LLC</i>	1112-17046	State of Oregon Circuit Court for Multnomah County
<i>Vioxx Products Liability Litigation</i>	MDL No. 1657	U.S. District Court for the Eastern District of Louisiana
<i>Glaberson v. Comcast Corp.</i>	2:03-cv-06604-JP	U.S. District Court for the Eastern District of Pennsylvania
<i>Dolmage v. Province of Ontario</i>	CV-09-376927CP00	Ontario Superior Court of Justice
<i>Blessing v. Sirius XM Radio, Inc.</i>	09-CV-10035 HB	U.S. District Court for the Southern District of New York.
<i>Cipro Cases I and II</i>	No. 4154 and No. 4220	Superior Court of California
<i>In re National Football League Players' Concussion Injury Litigation</i>	MDL No. 2323	U.S. District Court for the Eastern District of Pennsylvania
<i>Hanley v. Fifth Third Bank</i>	1:2012cv01612	U.S. District Court for the Northern District of Illinois
<i>Roos v. Honeywell Int'l, Inc.</i>	04-0436205	Superior Court of California
<i>United Desert Charities, et al. v. Sloan Valve Company, et al.</i>	CV12-06878	U.S. District Court, Central District of California
<i>In re Toyota Motor Corp. Unintended Acceleration Mktg, Sales Practs., & Prods. Litig.</i>	10-ml-2151	U.S. District Court for the Central District of California
<i>Abbott v. Lennox Industries Inc.</i>	16-2011-CA-010656	4th Jud. Cir. Ct., Dade Cty. Fla.
<i>In re: Metoprolol Succinate End-Payor Antitrust Litigation</i>	06-cv-71	U.S. District Court for the District of Delaware
<i>In re Imprelis® Herbicide Marketing, Sales Practices and Products Liability Litigation</i>	MDL 2284	U.S. District Court for the Eastern District of Pennsylvania
<i>Smajlaj, et al. v. Campbell Soup Company, et al.</i>	10-cv-01332-JBS-AMD	U.S. District Court for the District of New Jersey
<i>Kramer v. B2Mobile, LLC</i>	10-cv-02722	U.S. District Court for the Northern District of California
<i>Donovan v. Philip Morris USA, Inc.</i>	06-CA-12234	U.S. District Court for the District of Massachusetts
<i>In re National Arbitration Forum Trade Practices Litigation</i>	MDL No. 10-2122	U.S. District Court for the District of Minnesota
<i>In re: Pharmaceutical Industry Average Wholesale Price Litigation</i>	No. 01-CV-12257-PBS, MDL No. 1456	U.S. District Court for the District of Massachusetts
<i>Nelson v. Mead Johnson & Company, LLC</i>	09-cv-61625-JIC	U.S. District Court for the Southern District of Florida
<i>Lee v. Carter-Reed Company, L.L.C.</i>	UNN-L-3969-04	Superior Court of New Jersey, Union County
<i>FTC Iovate Settlement</i>		Federal Trade Commission
<i>FTC LeanSpa Settlement</i>		Federal Trade Commission
<i>FTC Walgreens Settlement</i>		Federal Trade Commission
<i>Glazer v. Whirlpool Corp.</i>	No. 1:08-WP-65000, MDL 2001	U.S. District Court for the Northern District of Ohio



<i>Behrend v. Comcast Corp.</i>	03-6604	U.S. District Court for the Eastern District of Pennsylvania
<i>Commonwealth of Massachusetts v. Fremont Investment & Loan</i>	07-4373-BLS	Commonwealth of Massachusetts
<i>Dolmage v. Province of Ontario</i>	CV-09-376927	Ontario Superior Court of Justice
<i>In re Lawn Mower Engine Horsepower Marketing and Sales Practices Litigation</i>	MDL No. 1999, 2:08-md-01999	U.S. District Court for the Eastern District of Wisconsin
<i>Craft, et al. v. Philip Morris Companies, Inc., et al.</i>	002-00406-02	Missouri Circuit Court, Twenty-Second Judicial Circuit
<i>In Re: Pre-Filled Propane Tank Marketing and Sales Practices Litigation</i>	MDL No. 2086	U.S. District Court for the Western District of Missouri
<i>In re BP Propane Indirect Purchaser Antitrust Litigation</i>	06-CV-3841	U.S. District Court for the Northern District of Illinois
<i>In re Vytarin/Zetia Marketing, Sales Practices, and Products Liability Litigation</i>	08-285(DMC)	U.S. District Court for the District of New Jersey
<i>In re Bluetooth Headset Product Liability Litigation</i>	07-ML-1822, MDL 1822	U.S. District Court for the Central District of California
<i>The Authors Guild, Inc., et al. v. Google Inc.</i>	05 CV 8136-DC	U.S. District Court for the Southern District of New York
<i>Larry Bowens, et al. v. 7-Eleven, Inc., The Southland Corporation, MDK Corporation, and ENSR Corporation</i>	20D03-0209-CT-48	Elkhart Superior Court No. 3
<i>Sadowski v. General Motors Corp.</i>	HG03093843	Superior Court of the State of California for the County of Alameda
<i>Cox, et al. v. Shell Oil Company</i>	18,844	Chancery Court for Obion County, at Union City, Tennessee
<i>Wilson v. Airborne, Inc., et al.</i>	EDC V07-770 VAP (OPx)	U.S. District Court for the Central District of California
<i>Galanti v. Goodyear Tire & Rubber Company</i>	03-209	U.S. District Court for the District of New Jersey
<i>In re Toys "R" Us Antitrust Litigation</i>	CV-97-5750, MDL No. 1211	U.S. District Court for the Eastern District of New York
<i>In re W.R. Grace & Co.</i>	01-01139	U.S. Bankruptcy Court for the District of Delaware
<i>Cobell v. Salazar</i>	96-01285	U.S. District Court for the District of Columbia
<i>Dryer v. National Football League</i>	9-02182	U.S. District Court for the District of Minnesota
<i>In re Black Farmers Discrimination Litig.</i>	08-511	U.S. District Court for the District of Columbia
<i>Keepseagle v. Vilsack</i>	99-03119	U.S. District Court for the District of Columbia
<i>In re Energy Future Holdings Corp.</i>	14-10979	U.S. Bankruptcy Court for the District of Delaware
<i>In re Garlock Sealing Technologies LLC</i>	10-31607	U.S. Bankruptcy Court for the Western District of North Carolina



<i>In re SCBA Liquidation, Inc., f/k/a Second Chance Body Armor, Inc.</i>	04-12515	U.S. Bankruptcy Court for the Western District of Michigan
<i>In re Enfamil LIPIL Mktg. & Sales Practs. Litig.</i>	MDL No. 2222	U.S. District Court for the Southern District of Florida

ARTICLE

Shannon Wheatman & Elaine Pang, *Reality Check: The State of Media and Its Usage in Class Notice*, in *A Practitioner's Guide to Class Actions*, 3rd Ed. 849 - 858 (Marcy Greer ed., 2021)

EXHIBIT B

**Class
Action
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CAPABILITIES

About A.B. Data


 Founded in 1981, **A.B. Data has earned a reputation** for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA, Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data offers unmatched resources and capacity and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortalSM, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

Location, Ownership Structure

 **A.B. Data is an independently owned**, more than 40-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

Services

All Digital — From Notice to Distribution

A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

Pre-Settlement Consultation

The pre-settlement consultation is a collaborative session designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

Media Services

A.B. Data continues to earn our reputation as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

Notice Administration

In A.B. Data, clients have a comprehensive resource with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

Claims Processing

A.B. Data continues to bring game-changing technologies to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

Contact Center

A.B. Data's Contact Center is comprised of a full staff that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

Case Websites

We offer a state-of-the-art technology platform that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

Settlement Fund Distribution

From complete escrow services to establishment of qualified settlement funds, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to

instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

Bruce A. Arbit, Co-Managing Director and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

Thomas R. Glenn, President, Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

Eric Miller, Senior Vice President, as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Eric Schachter, Senior Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. He has over 15 years of experience in the legal settlement administration services industry. Mr. Schachter's responsibilities include ensuring successful implementation of claims administration services for A.B. Data's clients in accordance with settlement agreements, court orders, and service agreements. He also works closely with Project Managers to develop plans of administration to provide the highest level of effective and efficient delivery of work product. A frequent speaker on claims administration innovation and best practices at industry events nationwide, Mr. Schachter has a bachelor's degree in sociology from Syracuse University, earned his law degree at Hofstra University School of Law, and was previously an associate at Labaton Sucharow LLP in New York City.

Elaine Pang, Vice President, Media, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Pang brings more than 15 years of experience in developing and implementing multifaceted digital and traditional media for high profile complex legal notice programs. She uses her experience in class actions and advertising to provide the best practicable notice plans for large scale campaigns across domestic and international regions, and she leverages her expertise to better understand the evolving media landscape and utilize cutting-edge technology and measurement tools. Prior to entering the class action industry, Ms. Pang worked with many leading reputable brands, including General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox. She earned her MBA from Strayer University and holds a BS in Marketing from Pennsylvania State University. Ms. Pang's credentials include Hootsuite Social Marketing Certification, Google Adwords and Analytics Certification, and IAB Digital Media Buying and Planning Certification.

Paul Sauberer, Vice President of Quality, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

Justin Parks, Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. Mr. Parks brings extensive experience in client relations to A.B. Data's business development team. Mr. Parks has over 15 years of experience in the legal settlement administration services industry and has successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), including some of the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

Steve Straub, Senior Director of Operations, started with A.B. Data in 2012 as a Claims Administrator. He moved through the ranks within the company where he spent the past five years as Senior Project Manager managing many of the complex commodities cases such as *In re LIBOR-Based Financial Instruments Antitrust Litigation*, *In re London Silver Fixing, Ltd. Antitrust Litigation*, and *Laydon v. Mizuho Bank, Ltd., et al.* Mr. Straub's performance in these roles over the past ten years, along with his comprehensive knowledge of company and industry practices and first-person experience leading the project management team, has proven him an invaluable member of the A.B. Data team.

In his role as Claimant Operations Director, his responsibilities include developing efficiencies within the operations center, which includes mailroom, call center, and claims processing areas. His areas of expertise include business process development, strategic/tactical operations planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. Mr. Straub is well-versed in the administration of securities, consumer, and antitrust class action settlements. He earned his Juris Doctor degree from Seton Hall University School of Law in Newark, New Jersey.

Jack Ewashko, Director of Client Services, brings twenty years of industry and brokerage experience to his role with A.B. Data. He is an accomplished client manager adept at facilitating proactive communications between internal and outside parties to ensure accurate and timely deliverables. Mr. Ewashko previously held positions at two claim administration firms where he oversaw the securities administration teams and actively managed numerous high-profile matters, including the \$2.3 billion foreign exchange litigation. He notably served as Vice President, FX and Futures Operations at Millennium Management, a prominent global alternative investment management firm. As he progressed through trading, analytic, management, and consultancy roles at major banks and brokerage firms, Mr. Ewashko gained hands-on experience with vanilla and exotic securities products, including FX, commodities, mutual funds, derivatives, OTC, futures, options, credit, debt, and equities products. In the financial sector, he also worked closely with compliance and legal teams to ensure accuracy and conformity with all relevant rules and regulations regarding the marketing and sale of products, as well as the execution and processing of trades. He has held Series 4, Series 6, Series 7, and Series 63 licenses, and has been a member of the Futures Industry Association (FIA) and Financial Industry Regulatory Authority (FINRA). Mr. Ewashko earned his Bachelor of Business Administration from Long Island University, Brooklyn, New York.

Brian Devery, Director of Client Services, brings more than a decade of experience in class action administration and project management, as well as over two decades of experience as an attorney (ret.). Mr. Devery currently focuses on consumer, antitrust, employment, and other non-securities based administrations. In addition to driving project administration, he is focused on the implementation of process improvement, streamlining, and automation. Mr. Devery is admitted to practice law in State and Federal Courts of New York with his Juris Doctorate earned from the Maurice A. Deane School of Law at Hofstra University, Hempstead, New York.

Adam Walter, PMP, Director of Client Services, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

Eric Nordskog, Director of Client Services, started with A.B. Data in 2012 on the operations team, managing dozens of team leads and claims administrators in the administration of legal cases and actions. In 2017, Mr. Nordskog was promoted to Project Manager, due in part to his proven ability to add consistency and efficiency to the e-claim filing process with new streamlined processes and audit practices. Today, as Senior Project Manager, he directs many of A.B. Data's securities, insurance, and

consumer cases. He regularly oversees the administration of large insurance cases, such as two recent Cigna Insurance matters that involved complex calculations and over one million class members each. He is also the primary hiring and training manager for new project managers and coordinators. Mr. Nordskog earned his Juris Doctor degree from Marquette University Law School, Milwaukee, in 2001.

Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

Secure Environment



A.B. Data's facilities provide the highest level of security and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol – every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

Data Security



A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

Fraud Prevention and Detection



A.B. Data is at the forefront of class action fraud prevention.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

Representative Class Action Engagements



A.B. Data and/or its team members have successfully administered hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

Consumer & Antitrust Cases

- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *In re Broiler Chicken Antitrust Litigation - Commercial (Indirect)*
- *In re Broiler Chicken Antitrust Litigation - Indirect*
- *In re Broiler Chicken Antitrust Litigation - Direct*
- *In re Pork Antitrust Litigation - Directs*
- *In re Pork Antitrust Litigation - Indirects*

- *Peter Staley, et al. v. Gilead Sciences, Inc., et al.*
- *In re: Opana ER Antitrust Litigation*
- *In re Ranbaxy Generic Drug Application Antitrust Litigation*
- *In re Valeant Pharmaceuticals Int'l, Inc. Third-Party Payor Litigation*
- *Staley, et al., v. Gilead Sciences*
- *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation – Direct Purchasers*
- *Beef Direct Purchaser Antitrust Litigation*
- *BCBSM, Inc. v. Vyera Pharmaceuticals, et al. (Daraprim)*
- *In re Automobile Antitrust Cases I and II*
- *Olean Wholesale Grocery Cooperative, Inc., et al. v. Agri Stats, Inc., et al. (Turkey)*
- *Integrated Orthopedics, Inc., et al. v. UnitedHealth Group, et al.*
- *In Re: Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*
- *Vista Healthplan, Inc., et al. v. Cephalon, Inc., et al. (Provigil)*
- *Jeffrey Koenig, et al. v. Vizio, Inc.*
- *Wit, et al. v. United Behavioral Health*
- *Weiss, et al. v. SunPower Corporation*
- *Smith, et al. v. FirstEnergy Corp., et al.*
- *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*
- *Julian, et al. v. TTE Technology, Inc., dba TCL North America*
- *Eugenio and Rosa Contreras v. Nationstar Mortgage LLC*
- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. ("Lovenox Antitrust Matter")*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*
- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*

- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
- *In re Relafen Antitrust Litigation*
- *In Re Remeron Direct Purchaser Antitrust Litigation*
- *In re TriCor Indirect Purchasers Antitrust Litigation*
- *Nichols, et al., v. SmithKline Beecham Corporation*
- *In re: DDAVP Indirect Purchaser Antitrust Litigation*

Securities Cases

- *Plymouth County Retirement Association v. Spectrum Brands Holdings, Inc., et al.*
- *Tung, et al. v. Dycom Industries, Inc., et al.*
- *Boutchard., et al. v. Gandhi, et al. ("Tower/e-Minis")*
- *MAZ Partners LP v. First Choice Healthcare Solutions, Inc.*
- *SEB Investment Management AB, et al. v. Symantec Corporation, et al.*
- *In re Impinj, Inc. Securities Litigation*
- *In re Netshoes Securities Litigation*
- *Yellowdog Partners, LP, et al. v. Curo Group Holdings Corp., et al.*
- *In re Brightview Holdings, Inc. Securities Litigation*
- *In re Obalon Therapeutics, Inc. Securities Litigation*
- *In re Willis Towers Watson PLC Proxy Litigation*
- *In re Blue Apron Holdings, Inc. Securities Litigation*
- *In re: Qudian Inc. Securities Litigation*
- *Plymouth County Contributory Retirement System v. Adamas Pharmaceuticals, et al.*
- *In re Perrigo Company PLC Securities Litigation*
- *Enriquez, et al. v. Nabriva Therapeutics PLC, et al.*
- *Teamsters Local 456 Pension Fund, et al. v. Universal Health Services, Inc., et al.*
- *Olenik, et al. v. Earthstone Energy, Inc.*

- *Shenk v. Mallinckrodt plc, et al.*
- *In re The Allstate Corp. Securities Litigation*
- *Christopher Vataj v. William D. Johnson, et al. (PG&E Securities II)*
- *Kirkland v. WideOpenWest, Inc.*
- *Oklahoma Police Pension and Retirement System v. Sterling Bancorp, Inc.*
- *In re Uxin Limited Securities Litigation*
- *City of Hallandale Beach Police Officers' & Firefighters' Personnel Retirement Trust v. Ergen, et al. (Echostar)*
- *Lewis v. YRC Worldwide Inc., et al.*
- *Tomaszewski v. Trevena, Inc., et al.*
- *In re Restoration Robotics, Inc. Securities Litigation*
- *Public Employees' Retirement Systems of Mississippi, et al. v. Treehouse Foods, Inc., et al.*
- *Ronald L. Jackson v. Microchip Technology, Inc., et al.*
- *In re Micro Focus International plc Securities Litigation*
- *In re Dynagas LNG Partners LP Securities Litigation*
- *Weiss, et al. v. Burke, et al. (Nutraceutical)*
- *Yaron v. Intersect ENT, Inc., et al.*
- *Utah Retirement Systems v. Healthcare Services Group, Inc., et al.*
- *In re PPDAl Group Inc. Securities Litigation*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *In re Aqua Metals, Inc. Securities Litigation*
- *St. Lucie County Fire District Firefighters' Pension Trust Fund v. Southwestern Energy Company*
- *In re CPI Card Group Inc. Securities Litigation*
- *Arkansas Teacher Retirement System, et al. v. Alon USA Energy, Inc., et al.*
- *In re TAL Education Group Securities Litigation*
- *GCI Liberty Stockholder Litigation*
- *In re SciPlay Corporation Securities Litigation*
- *In re Allergan Generic Drug Pricing Securities Litigation*
- *In re Vivint Solar, Inc. Securities Litigation*
- *In re YayYo Securities Litigation*
- *In re JPMorgan Treasury Futures Spoofing Litigation*
- *Searles, et al. v. Crestview Partners, LP, et al. (Capital Bank)*
- *In re Lyft, Inc. Securities Litigation*
- *In re Aegean Marine Petroleum Network, Inc. Securities Litigation*
- *In re JPMorgan Precious Metals Spoofing Litigation*
- *In re Pivotal Software, Inc. Securities Litigation*
- *Longo, et al. v. OSI Systems, Inc., et al.*
- *In re Homefed Corporation Stockholder Litigation*
- *Pierrelouis v. Gogo Inc., et al.*
- *Pope v. Navient Corporation, et al.*
- *In re Merit Medical Systems, Inc. Securities Litigation*
- *In re Frontier Communications Corporation Stockholder Litigation*
- *Holwill v. AbbVie Inc.*
- *Budicak, Inc., et al. v. Lansing Trade Group, LLC, et al. (SRW Wheat Futures)*
- *Yannes, et al. v. SCWorx Corporation*
- *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*
- *In re Myriad Genetics, Inc. Securities Litigation*
- *In re Chicago Bridge & Iron Co. N.V. Securities Litigation*
- *The Arbitrage Fund, et al. v. William Petty, et al. (Exactech)*
- *In re Columbia Pipeline Group, Inc. Merger Litigation*

- *Martinek v. AmTrust Financial Services, Inc.*
- *City of Pittsburgh Comprehensive Municipal Pension Trust Fund, et al. v. Benefitfocus, Inc., et al.*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *Laydon v. Mizuho Bank, Ltd., et al.*
- *Lomingkit, et al. v. Apollo Education Group, Inc., et al.*
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*
- *Norfolk County Retirement System, et al. v. Community Health Systems, Inc., et al.*
- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*
- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*
- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
- *In re Liberty Tax, Inc. Stockholder Litigation*
- *In re RH, Inc. Securities Litigation*
- *Lazan v. Quantum Corporation, et al.*
- *Nabhan v. Quantum Corporation, et al.*
- *Edmund Murphy III, et al. v. JBS S.A.*
- *Public Employees' Retirement System of Mississippi, et al. v. Sprouts Farmers Market, Inc., et al.*
- *In re Starz Stockholder Litigation*
- *Judith Godinez, et al. v. Alere Inc., et al.*
- *Rahman and Giovagnoli, et al. v. GlobalSCAPE, Inc., et al.*
- *Arthur Kaye, et al. v. ImmunoCellular Therapeutics, Ltd., et al.*
- *In re CPI Card Group Inc. Securities Litigation*
- *Daniel Aude, et al. v. Kobe Steel, Ltd., et al.*
- *In re Quality Systems, Inc. Securities Litigation*
- *Cooper, et al. v. Thoratec Corporation, et al.*
- *Washtenaw County Employees' Retirement System, et al. v. Walgreen Co., et al.*
- *Elkin v. Walter Investment Management Corp., et al.*
- *In Re CytRx Corporation Securities Litigation*
- *Ranjit Singh, et al. v. 21Vianet Group, Inc., et al.*
- *In re PTC Therapeutics, Inc. Securities Litigation*
- *Securities and Exchange Commission v. Mark A. Jones*
- *In re Sequans Communications S.A. Securities Litigation*
- *In re Henry Schein, Inc. Securities Litigation*
- *Ronge, et al. v. Camping World Holdings, Inc., et al.*
- *Oklahoma Firefighters Pension & Retirement System v. Lexmark International, Inc.*
- *Christakis Vrakas, et al. v. United States Steel Corporation, et al.*
- *Emerson et al. v. Mutual Fund Series Trust, et al. ("Catalyst")*
- *In re Fannie Mae 2008 Securities Litigation*
- *In re Anadarko Petroleum Corporation Class Action Litigation*
- *Ge Dandong, et al., v. Pinnacle Performance Limited, et al.*
- *In Re: Rough Rice Commodity Litigation*
- *Xuechen Yang v. Focus Media Holding Limited et al.*
- *In re Massey Energy Co. Securities Litigation*

- *In re Swisher Hygiene, Inc.*
- *The City of Providence vs. Aeropostale, Inc., et al.*
- *In re Metrologic Instruments, Inc. Shareholders Litigation*
- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
- *Pension Trust Fund for Operating Engineers, et al. v. Assisted Living Concepts, Inc., et al.*
- *In re Lehman Brothers Equity/Debt Securities Litigation*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*
- *In re General Electric Co. Securities Litigation*
- *In re CNX Gas Corporation Shareholders Litigation*
- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*
- *In re Par Pharmaceutical Companies, Inc. Shareholders Litigation*
- *In re Delphi Financial Group Shareholders Litigation*
- *In re SLM Corporation Securities Litigation*
- *In re Del Monte Foods Company Shareholder Litigation*
- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
- *Michael Rubin v. MF Global, Ltd., et al.*
- *Allen Zametkin v. Fidelity Management & Research Company, et al.*
- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
- *In re ACS Shareholder Litigation, Consolidated C.A. No. 4940-VCP*
- *Lance Provo v. China Organic Agriculture, Inc., et al.*
- *In re LDK Solar Securities Litigation*

Labor & Employment Cases

- *Verizon OFCCP Settlement*
- *Alvarez, et al. v. GEO Secure Services, LLC*
- *Sartena v. Meltwater FLSA*
- *Carmen Alvarez, et al. v. Chipotle Mexican Grill, Inc., et al.*
- *Turner, et al. v. Chipotle Mexican Grill, Inc.*
- *Long, et al. v. Southeastern Pennsylvania Transportation Authority*
- *Matheson, et al. v. TD Bank, N.A.*
- *Ludwig, et al. v. General Dynamics Information Technology, Inc., et al.*
- *Bedel, et al. v. Liberty Mutual Group Inc.*
- *Irene Parry, et al. v. Farmers Insurance Exchange, et al.*
- *Maldonado v. The GEO Group, Inc.*
- *Alderman and Maxey v. ADT, LLC*
- *Albaceet v. Dick's Sporting Goods*
- *Rodriguez v. The Procter & Gamble Company*
- *Adekunle, et al. v. Big Bang Enterprises, Inc. d/b/a The Revenue Optimization Companies*
- *Gorski, et al. v. Wireless Vision, LLC*
- *Lopez, et al. v. New York Community Bank, et al.*
- *Hamilton, et al. v. The Vail Corporation, et al.*
- *Eisenman v. The Ayco Company L.P.*
- *Matheson v. TD Bank, N.A.*

- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
- *Perez v. Mexican Hospitality Operator LLC, d/b/a Cosme*
- *Shanahan v. KeyBank, N.A.*
- *Loftin v. SunTrust Bank*
- *Alvarez v. GEO Secure Services, LLC*
- *Weisgarber v. North American Dental Group, LLC*
- *Talisa Borders, et al. v. Wal-mart Stores, Inc.*
- *Reale v. McClain Sonics Inc., et al.*
- *Larita Finisterre and Songhai Woodard, et al. v. Global Contact Services, LLC*
- *Adebisi Bello v. The Parc at Joliet*
- *Garcia, et al. v. Vertical Screen, Inc.*
- *Brook Lemma and Matthieu Hubert, et al. v. 103W77 Partners LLC, et al. ("Dovetail Settlement")*
- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
- *Lisa Ferguson, Octavia Brown, et al. v. Matthew G. Whitaker, Acting AG, DOJ Bureau of Prisons ("USP Victorville")*
- *American Federation of Government Employees, Local 2001 v. Federal Bureau of Prisons, Federal Correctional Institution, Fort Dix, New Jersey*
- *American Federation of Government Employees, Local 506 v. U.S. Department of Justice, Federal Bureau of Prisons, U.S. Penitentiary Coleman II, Coleman, Florida*
- *Vargas v. Sterling Engineering*
- *Rosenbohm v. Verizon*
- *Alex Morgan, et al. v. United States Soccer Federation, Inc.*
- *Iskander Rasulev v. Good Care Agency, Inc.*
- *Kyndl Buzas, et al., v. Phillips 66 Company and DOES 1 through 10*
- *American Federation of Government Employees, Local 408 v. U.S. Dept. of Justice, Federal Bureau of Prisons, Federal Correctional Complex, Butner, NC*
- *In re 2014 Avon Products, Inc. ERISA Litigation*
- *In re Eastman Kodak ERISA Litigation*
- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
- *Lisa Ferguson, et al. v. Acting Attorney General Matthew Whitaker, Department of Justice*
- *Melissa Compere v. Nusret Miami, LLC, et al.*
- *Abelar v. American Residential Services, L.L.C., Central District of California*
- *Flores, et al. v. Eagle Diner Corp., et al., Eastern District of Pennsylvania*
- *Michael Furman v. Godiva Chocolatier, Inc., 15th Judicial Circuit, Palm Beach County, Florida*
- *Finisterre et. al v. Global Contact Services, LLC, New York State Supreme Court, Kings County*
- *McGuire v. Intelident Solutions, LLC, et al., Middle District of Florida, Tampa Division*
- *Duran De Rodriguez, et al. v. Five Star Home Health Care Agency, Inc. et al., Eastern District of New York*

Data Breach/BIPA Cases

- *Hunter v. J.S.T. Corp. BIPA Settlement*
- *Atkinson, et al. v. Minted, Inc.*
- *Rosenbach, et al. v. Six Flags Entertainment Corporation and Great America LLC*
- *Pratz, et al. v. MOD Super Fast Pizza, LLC*
- *The State of Indiana v. Equifax Data Breach Settlement*
- *In re: Vizio, Inc. Consumer Privacy Litigation*
- *In re: Google, Inc. Street View Electronic Communications Litigation*
- *Devin Briggs and Bobby Watson, et al. v. Rhinog, Inc. ("Briggs Biometric Settlement")*
- *Trost v. Pretium Packaging L.L.C.*

- *In re: Barr, et al. v. Drizly, LLC f/k/a Drizly, Inc., et al.*

Telephone Consumer Protection Act (TCPA) Cases

- *Perrong, et al. v. Orbit Energy & Power, LLC*
- *Baldwin, et al. v. Miracle-Ear, Inc.*
- *Floyd and Fabricant, et al. v. First Data Merchant Services LLC, et al.*
- *Hoffman, et al. v. Hearing Help Express, Inc., et al.*
- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*
- *Charvat, et al. v. National Holdings Corporation*
- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America, et al.*
- *Ellman v. Security Networks*

For More Information

For more detailed information regarding A.B. Data's experience, services, or personnel, please see our website at www.abdataclassaction.com.

EXHIBIT C



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Proposed Notice Program

In re: NorthShore University HealthSystem Antitrust Litigation

No. 1:07-cv-04446

United States District Court for the Northern District of Illinois, Eastern Division

CASE BACKGROUND AND CLASS DEFINITION

Case Background

A.B. Data, Ltd. (“A.B. Data”) is submitting this proposed Notice Program in connection with *In re: NorthShore University HealthSystem Antitrust Litigation*, a case before the United States District Court for the Northern District of Illinois, Eastern Division (the “Court”). This document outlines the efforts that will be made to provide notice to potential members of the Class.

The lawsuit claims that NorthShore overcharged purchasers for healthcare services after it merged with Highland Park Hospital. On December 16, 2013, the Court certified a class of people and entities who purchased both inpatient hospital services and hospital-based outpatient services. A.B. Data provided the Notice of Pendency and Supplemental Notice of Pendency to that class. The previous notice program consisted of sending direct notice to the class using a comprehensive mailing list compiled from several sources (described in more detail below).

On March 1, 2018, the Court issued an Order saying that the price increases would only have affected those who paid for inpatient hospital services.

Class Definition

The current Class is defined as:

All persons or entities in the United States of America and Puerto Rico, except those who solely paid fixed amount co-pays, uninsureds who did not pay their bill, Medicaid and Traditional Medicare patients, governmental entities, defendant, other providers of healthcare services, and the present and former parents, predecessors, subsidiaries and affiliates of defendant and other providers of healthcare services who purchased or paid for inpatient hospital services directly from NorthShore University HealthSystem (formerly known as Evanston Northwestern Healthcare), its wholly-owned hospitals, predecessors, subsidiaries, or affiliates other than those acquired as a result of the merger with Rush North Shore Medical Center from February 10, 2000 to December 31, 2015.

NOTICE PROGRAM OVERVIEW

This document summarizes the recommended notice program for the class action *In re: NorthShore University HealthSystem Antitrust Litigation* and how it was developed. This proposed program meets the requirements in Rule 23 of the Federal Rules of Civil Procedure and due process.

As stated in Rule 23(c)(2)(B) of the Federal Rules of Civil Procedure, “individual notice to all members who can be identified through reasonable effort” is the best notice option. Direct notice via mail and email, with supplemental paid and earned media, will be used to provide notice to potential members of the Class.

A dedicated informational case-specific website and call center will complement the proposed Notice Program and ensure members of the Class can easily access updated information.

DIRECT NOTICE

The proposed Notice Program involves significant direct notice *via* email and First-Class U.S. Mail. A.B. Data previously provided Notice of Pendency and Supplemental Notice of Pendency in this case to mailing lists comprised of:

- a. Records from NorthShore University HealthSystem (“NorthShore”) of non-Medicare patients that received services at NorthShore from January 1, 2000 through October 5, 2014 (“ENH Data”),
- b. Records from A.B. Data’s proprietary database of third-party payors and their representatives¹ (“TPP Mailing List”), and
- c. Records of additional self-funded group plans provided by Counsel (“Supplemental TPP Mailing List”).

NorthShore will provide a refined list of potential members of the Class, including names, addresses, and records including payment information for all the individuals and entities who purchased inpatient hospital services from NorthShore (or Evanston Northwestern Healthcare Corporation (“ENH”)) during the Class Period (“Class List”). It is our understanding that the updated Class List will encompass the entire universe of potential members of the Class.

A.B. Data will coordinate receipt of the Class List and process the data to ensure adequate address formatting.

¹ A.B. Data has a proprietary database listing the names and addresses of approximately 42,000 entities that include: (i) insurance companies; (ii) health maintenance organizations; (iii) self-insured entities such as large corporations, labor unions, and employee benefit and pension plans; and (iv) certain record keepers and other entities that represent TPPs, such as pharmacy benefit managers and third-party administrators. It is compiled using membership listings and existing databases from publicly available sources, including U.S. Department of Labor Form 5500 filings, the Pharmacy Benefits Management Institute, and prior pharmaceutical litigation that A.B. Data has administered.

A.B. Data will mail the Short-Form notice, formatted as a postcard, via U.S. Mail to potential members of the Class with a mailing address. Prior to mailing, A.B. Data will standardize and update all mailing addresses through the Coding Accuracy Support System (CASS) and the United States Postal Service ("USPS") National Change of Address ("NCOA") database. All postcards that are returned as undeliverable with forwarding addresses provided by USPS will be processed, updated in the case-specific database, and re-mailed. For postcards returned without any forwarding addresses, A.B. Data will attempt to obtain updated addresses for the addressees concerned using proprietary subscription databases and, in instances where updated addresses are found, re-mail the applicable postcards.

A.B. Data will email the Short-Form notice to potential members of the Class for whom email addresses are available. When providing email notice, A.B. Data implements certain best practices to maximize deliverability, such as avoiding email attachments and certain trigger words to prevent notices from being caught in SPAM and junk filters.

The Short-Form (email and postcard) notices will include the case-specific website and toll-free telephone number.

Also, the Long-form notice will be mailed to anyone who calls the toll-free number, writes, or emails to request one.

PAID MEDIA PROGRAM

To supplement the direct notice, A.B. Data recommends using paid media to reach those who do not receive a Short-Form notice via mail or email. Paid-media advertising is guaranteed to appear and allows control over the content, timing, and positioning of the message.

Geographic Considerations

Paid media notice to the Class will be targeted to Illinois and nationwide to reach those who may have relocated. Given the significant time that has elapsed since the Class Period, it is possible that members of the Class (individuals and businesses) may have moved locally, regionally, nationally, or otherwise. For these reasons, A.B. Data recommends the Notice Program include national paid media to reach potential members of the Class who are no longer located within Illinois.

Digital Media



Digital and social media is a key component of paid media programs, as 93% of American adults use the Internet.² A.B. Data recommends using a variety of relevant websites and social media applications to maximize exposure to potential members of the Class.

² Pew Research Center, *Internet/Broadband Fact Sheet*, <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/>, last visited (January 9, 2024)

All digital and social media ads will include images appropriate for this case and an embedded and trackable link to the case-specific Settlement Website to increase the ad visibility and click-through rate. Banner ads will use standard Interactive Advertising Bureau (“IAB”)³ sizes (300 x 250, 728 x 90, 300 x 600, 320 x 50, 300 x 50). Links from the ads will be tracked using Google Analytics tracking codes. Digital placements will be optimized to adjust for audiences that are most responsive and engaged and maximize exposure across websites that are best driving potential members of the Class to the case website.



Banner and newsfeed ads will be placed in premium positions on websites and social media sites, so they are easily seen when viewers first open the website page or application and without scrolling. A case-specific Facebook page will be created as a landing page for the links in the Facebook and Instagram newsfeed ads.

Digital and social media and search advertising will appear for 30 days on websites and apps. Ads will be viewable across multiple devices, including mobile, tablet, and desktop. A minimum 4 million impressions⁴ will be delivered to the target audience using the following digital platforms:

Platform	Description
	<p>Google Display Network (“Google”) places digital ads on websites, blogs, and other properties within its own network and over 2 million other websites across the Internet. Individuals use Google for search, email, maps, and other applications. Google allows us to place banner ads next to relevant content where we want the banner ads to appear, such as healthcare, doctor information, and other medical-related topics.</p>
	<p>Sponsored search listings in the form of text ads will be purchased to appear on Google and/or other search partners to make it easier for potential members of the Class to locate the Settlement Website. When a person uses a specific target phrase and/or keyword in a search engine to search for information, the link to the Settlement Website may appear on the search result pages. Sample keyword terms or phrases may include “NorthShore Settlement,” “ENH class action,” “NorthShore class action lawsuit,” “Evanston hospital settlement,” “Northshore inpatient hospital class,” plus many others.</p>

³ The Interactive Advertising Bureau (“IAB”) is an American advertising business organization that develops industry standards, conducts research, and provides legal support for the online advertising industry.

⁴ Gross (targeted) impressions are the duplicated sum of audiences of all media vehicles containing the notice.

Platform	Description
	<p>YouTube is an online video sharing and social media platform that has over 200 million users in the United States. It is owned by Google, so it is more efficient to optimize advertising campaigns. YouTube offers selective targeting abilities. Banner ads will be server based on users’ interests and habits (e.g., health, medical, doctors, finance) and new users who are searching for videos about healthcare, etc.</p>
	<p>Facebook.com is a free, global social networking website that helps people communicate with friends, family, and coworkers. Individuals frequently visit this platform to post photos and videos, send messages to family and friends, and follow news about their social network.</p>
	<p>Instagram is a photo and video sharing social networking application with highly engaged users who click on posts and ads. With one of the highest engagement rates in the industry, Instagram users frequently visit the application, often multiple times a day.</p>

Targeted digital and social media advertising will also be used. This type of advertising allows ads to reach a specific audience segments based on demographics, interests, geographic areas, and more. This type of advertising can often be more effective at getting a response. Tactics include:

Strategy	Description
Geographic	Ads geo-targeted to Illinois and nationally (to reach those who may have relocated).
Mobile – In-App	Ads targeted to individuals, including those from available data, while they are using relevant mobile applications. Mobile applications could include health apps, medical-related apps, and others.
Mobile – Websites	Ads targeted to phones and tablets whose users are visiting websites that are contextually relevant or websites being visited by relevant users.
Contextual/Channel Targeting	Ads targeted to individuals who visited websites with relevant content and context, such as medical topics, health, doctors, and others.

Strategy	Description
Behavioral	Ads targeted to user IDs across the Internet whose owners have shown activity (e.g., clicked through to the settlement website) in the past or registered on the case website.
Predictive (Look-Alike) Modeling	Using “look-alike” modeling to target ads to user IDs whose owners have strong similarities to users who have previously “clicked through” to the case website.
Class Lists	Ads targeted to available lists of known or potential members of the Class.

A.B. Data employs a full, in-house media staff of digital buyers who actively manage and control all digital and social media programs. While the digital and social media and search advertising is running, these experts monitor the conversions and other activity associated with this advertising, adjust it as needed to ensure maximum success, and ensure impressions are delivered to the intended audience.

The A.B. Data digital media team is certified in Google Ads Display, Google Ads Search, Google Analytics, Facebook Digital Marketing, IAB Digital Media Buying & Planning, IAB Digital Media Sales, and Hootsuite Social Marketing.

EARNED MEDIA

In addition to the proposed direct notice and paid media components, a news release will be distributed via *PR Newswire*’s US1 Newswire to help the case gain more attention from the media and potential members of the Class. The press release will reach traditional media outlets (television, radio, newspapers, magazines), news websites, and journalists nationwide.

News about the case will also be broadcast to the news media via X (formerly known as Twitter). It will be tweeted from *PR Newswire* and A.B. Data’s X (Twitter) accounts to thousands of news media and other followers. The news release will also assist with driving search engine results and help increase traffic to the case-specific website.

DELIVERY & DUE PROCESS

The proposed Notice Program is, in A.B. Data’s experience, the best practicable under the circumstances to reach potential members of the Class and meets due process requirements.

In this case, a comprehensive mailing list will be used to provide direct notice to known members of the Class. The proposed Notice Program uses the same method that was used to provide notice in this case previously plus additional media to reach those who do not receive direct notice. A.B. Data believes that the proposed Notice Program will reach more than 80% of the Class. It is consistent with The Federal Judicial Center’s *Judges’ Class Action Notice and Claims Process*

Checklist and Plain Language Guide, which considers a 70%-95% reach among class members reasonable.⁵

NOTICE DESIGN STRATEGIES

The Federal Rules of Civil Procedure require notices in class action cases to be written in “plain, easily understood language.” A.B. Data is committed to adhering to the easily-understood-language requirement of Rule 23(c)(2) and Rule 23(b)(3), and this standard was utilized in developing the Long-Form and Short-Form notices for this case. The notices include all required information about members of the Class’s rights and options. They are designed to encourage readership and understanding in a well-organized and reader-friendly format.

The plain-language notices were designed with large, bold headlines to be easily seen by potential members of the Class. Simple, easily understood language within the notices helps ensure potential members of the Class will understand the subject of the case, their legal rights and options, and how to act on those rights.

The notices prominently display the case-specific Settlement Website address and the toll-free telephone number, so potential members of the Class can get assistance and additional information and updates about the case. The detailed Long-Form and Short-Form notices will be available on the website.

The online banner ads and social media newsfeed ads will be designed with simple text to alert potential members of the Class about the case. Each ad will include a link to the Settlement Website, so when potential members of the Class click on it, they will go directly to the website where they can find answers to commonly asked questions, download case information, or file a claim. A.B. Data strongly recommends including photos as part of the newsfeed and banner ads to increase awareness, generate interest, and increase the click-through rate to the website.

Below are proposed banner and social media ads:

⁵ The Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide states: “The lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70-95%.”

An advertisement featuring a photograph of two medical professionals in white lab coats on the left. The background is a light teal color. Text is overlaid on the right side of the image.

**Did You Pay for
Inpatient Hospital
Services at**

**NorthShore
University
HealthSystem
(or Evanston
Northwestern
Healthcare)?**

**YOU COULD GET MONEY
FROM A SETTLEMENT**

LEARN MORE > NorthShoreAntitrustLitigation.com

EXHIBIT D

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Did You Pay for Inpatient Hospital Services at NorthShore University HealthSystem (or Evanston Northwestern Healthcare)?

You Could Get Money from a Settlement.

A federal court authorized this Notice. You are not being sued.

- There is a Settlement in a class action lawsuit with NorthShore University HealthSystem (“NorthShore”), formerly Evanston Northwestern Healthcare Corporation (“ENH”). The lawsuit claims that NorthShore overcharged purchasers for inpatient healthcare services after it merged with Highland Park Hospital. NorthShore denies that it did anything wrong.
- Generally, you are included in the Settlement if you are in the United States or Puerto Rico and paid NorthShore **directly** for inpatient hospital services from February 10, 2000 to December 31, 2015. You may be able to get money from this Settlement.
- You may have seen a previous notice that stated purchasers of outpatient hospital services were included in that Class. That Class has changed to include only those who purchased inpatient hospital services. The Class Period has been revised, and the Court has made clear that some entities were not Current Class (described in Question 5 below) members because they did not directly pay NorthShore or because they were subject to arbitration agreements with NorthShore. As a result, some parties who were—or who were previously believed to be—members of the original class are not members of the Current Class. In addition, members of the original class who excluded themselves from that class are not members of the Current Class. Please review this Notice carefully to determine whether you are part of the Current Class and your rights.
- A \$55 million Settlement Fund (“Settlement Fund”) will pay (1) attorneys’ fees, costs, and expenses; (2) notice and administration costs; (3) an incentive award to the Class Representative¹; and (4) money to eligible members of the Current Class according to a Court-approved Plan of Allocation.
- **Your legal rights are affected even if you do nothing. Please read this Notice carefully.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT IF YOU ARE A MEMBER OF THE CURRENT CLASS		DEADLINE
SUBMIT A CLAIM	To get a payment, you must submit a valid Claim Form (<i>see</i> Question 16). At this time, it is unknown how much each individual or entity who submits a valid claim will receive. The amount of your payment will depend on the amount you paid for inpatient hospital services and the amount of all claims that are filed.	[Month 00, 202X]

¹ All capitalized terms not otherwise defined herein shall have the meaning given to them in the Settlement Agreement dated as of December 13, 2023.

<p>EXCLUDE YOURSELF</p>	<p>Members of the Current Class (defined in Question 5) may ask to be excluded from the Class. If you do so, you will not receive any benefit from the Settlement, but you retain your right to sue the Defendant on your own. However, your claims might be barred by the applicable statute of limitations.</p>	<p>[Month 00, 202X]</p>
<p>OBJECT</p>	<p>Write to the Court about why you don't like the Settlement.</p>	<p>[Month 00, 202X]</p>
<p>GO TO A HEARING</p>	<p>Ask to speak in Court to give your opinion about fairness of the Settlement and requested relief.</p>	<p>[Month 00, 202X]</p>
<p>DO NOTHING</p>	<p>Get no payment. If you do not do anything you will REMAIN a member of the Class and will be bound by all orders of the Court, but you will not participate in the Settlement Fund.</p>	<p>[Month 00, 202X]</p>

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.
- Payments will be made to those who qualify only if the Court approves the Settlement and after any appeals, if any, are resolved. Please be patient.

Basic Information

1. Why was this Notice issued?

The Court authorized this Notice because you have a right to know about a proposed Settlement, and your rights and options, before the Court decides whether to approve the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights. Your legal rights are affected whether you act or not.

Judge Edmond E. Chang of the United States District Court for the Northern District of Illinois, Eastern Division, is overseeing this case. This lawsuit is currently known as *In re: NorthShore University HealthSystem Antitrust Litigation*, No. 1:07-cv-04446. It was previously called *In re: Evanston Northwestern Healthcare Corp. Antitrust Litigation*. The people who sued are called the “Plaintiffs.” NorthShore is the “Defendant.”

2. What is this lawsuit about?

The lawsuit claims NorthShore raised its rates after it acquired Highland Park Hospital, overcharging purchasers of inpatient hospital services, and it did so in a way that is alleged to be illegal under antitrust laws. The lawsuit claims that people and businesses paid more for these inpatient hospital services than they should have. NorthShore denies the claims in this lawsuit and that it did anything wrong.

This Notice is only a summary. More detail is provided in the Settlement Agreement, available at www.NorthShoreAntitrustLitigation.com.

3. Why is this a class action?

In a class action, one or more people called “class representatives” (in this case, David Freedman) sue on behalf of those who have similar claims. Together, all of these people and entities are a “class” or “class members.” One court and one case resolve the issues for all class members, except for those who exclude themselves from the class or have been excluded by the Court.

4. Why is there a Settlement?

The Court has not decided the merits of the case in favor of the Current Class or NorthShore. Instead, both sides have agreed to a Settlement. By agreeing to the Settlement, both sides avoid the costs and uncertainty of a trial, and members of the Current Class receive the benefits described in this Notice. The proposed Settlement does not mean that any law was broken or that NorthShore did anything wrong. The Lead Counsel believes that the Settlement is best for all members of the Class.

Who Is in the Settlement?

If you received a mailed Notice, then you may be a member of the Class. But even if you did not receive a mailed Notice, you may be a member of the Class, as described below.

5. Who is included in the Settlement?

You **are** included in the Current Class if you satisfy the following Class definition:

All persons or entities in the United States of America and Puerto Rico, except those who solely paid fixed amount co-pays, uninsureds who did not pay their bill, Medicaid and Traditional Medicare patients, governmental entities, defendant, other providers of healthcare services, and the present and former parents, predecessors, subsidiaries and affiliates of defendant and other providers of healthcare services, who purchased or paid for inpatient hospital services directly from NorthShore University HealthSystem (formerly known as Evanston Northwestern Healthcare), its wholly-owned hospitals, predecessors, subsidiaries, or affiliates other than those acquired as a result of the merger with Rush North Shore Medical Center from February 10, 2000 to December 31, 2015.

As a result of the Court’s decisions subsequent to its initial class certification definition for which Notice and an opportunity to request exclusion was provided, the Current Class (above) includes only members of the Current Class who paid NorthShore directly (not persons or entities which contracted with a third-party claims administrator to pay NorthShore on their behalf), for inpatient hospital services on or after February 10, 2000.

Any entity or person which excluded itself from the original class is also excluded from the Current Class and will NOT have another chance to request exclusion from the Current Class.

6. Who is not included in the Class?

The Current Class does **not** include:

- Persons or entities who only paid for outpatient services;
- Persons who paid only a fixed amount to NorthShore through co-pays;
- Persons without insurance who did not pay their bill;
- Self-insured entities and businesses which paid NorthShore through third-party claims administrators acting on their behalf;
- Medicaid and Traditional Medicare patients;
- Government entities;
- NorthShore and its present and former parents, predecessors, subsidiaries, and affiliates;
- Other healthcare services providers and their present and former parents, predecessors, subsidiaries, and affiliates;

- Other healthcare service providers who purchased or paid for inpatient hospital services directly from NorthShore, its wholly-owned hospitals, predecessors, subsidiaries, or affiliates (other than those acquired from the merger with Rush North Shore Medical Center);
- Certain insurance companies required to arbitrate their claims;
- Present and former parents, predecessors, subsidiaries, and/or affiliates of NorthShore;
- Persons who only received services at Skokie Hospital (formerly known as Rush North Shore Medical Center); and
- Anyone that previously excluded themselves from the Class (*see* Questions 5 and 8).

7. What is the difference between inpatient and hospital-based outpatient services?

Inpatient services are those hospital services that require an overnight hospital stay. Hospital-based outpatient services are hospital services that do not require an overnight hospital stay. Staying overnight in the emergency room is not considered an inpatient stay.

8. What are my rights if I am no longer included in the Class?

If you were part of the original class, but the Court's changes mean you are no longer a member of the Current Class, or if you excluded yourself or opted out of the Class by February 3, 2015, you will not receive a payment from this Settlement. But, you keep any right to sue NorthShore for the claims in this lawsuit which you may have. The Court's decisions in this case will not bind you because they no longer affect you.

9. Can I still get out of the Class?

Yes. If you are a member of the Current Class and did not exclude yourself or "opt out" of the original class, you may be able to exclude yourself or "opt out" of the Current Class.

If you want to exclude yourself from the Current Class, you must submit a written request for exclusion to the Notice and Claims Administrator. Your request for exclusion must include: (1) your full name, current mailing address, and telephone number; (2) the name of this case, *In re: NorthShore University HealthSystem Antitrust Litigation*, No. 1:07-cv-04446; and (3) a statement that you are a member of the Class and wish to be excluded from the Class.

Exclusion requests must be mailed to the Notice and Claims Administrator at the address below and **POSTMARKED** no later than [Month 00, 2024].

In re: NorthShore University HealthSystem Antitrust Litigation
EXCLUSIONS
P.O. Box 173001
Milwaukee, WI 53217

A separate exclusion request must be submitted by each member of the Current Class electing exclusion. Any member of the Current Class who does not submit a valid request for exclusion providing all necessary information will be bound by the orders of the Court and outcome of the case.

If you exclude yourself, you will not be legally bound by the orders of the Court or Judgment. You may be able to sue NorthShore in the future, but your claim may be subject to certain defenses, such as whether it is timely under the applicable statute of limitations.

If you do not exclude yourself or opt out of the Current Class (*see* Question 5), you are still included; you will be legally bound by all Court orders in this case, good or bad; and you give up the right to sue NorthShore on your own about the claims in this lawsuit. However, you still may be able to get a payment from this Settlement.

The Settlement Agreement, available at www.NorthShoreAntitrustLitigation.com, describes in detail the specific claims you give up. **Please read it carefully.**

Any entity that wants to opt out a member of the Current Class that the entity represents (*e.g.*, welfare funds or employers for whom the entity acts as an Administrative Services Organization) must include for each such member of the Current

Class all of the information noted in items 1-3 above. In addition, for each such member of the Current Class, the entity must provide a declaration from its authorized representative, substantially in the form noted below and executed specifically in connection with this litigation, attesting to the entity's authority to opt out the member of the Current Class's claims out of the Current Class. The entity must mail this information to the Notice and Claims Administrator at the address above and it must be POSTMARKED no later than **[Month 00, 2024]**.

Date	
Declarant Entity Name	Declarant Entity Address
Declarant Entity Telephone Number	
Declarant Entity EIN	
Dear Notice and Claims Administrator:	
I am [Name and Title of Officer or Employee of Declarant member of the Current Class Requesting Exclusion]. [Declarant member of the Current Class] has authorized [Submitting Entity] to request exclusion from the Current Class on [Declarant member of the Current Class's] behalf in the case of <i>In re: NorthShore University HealthSystem Antitrust Litigation</i> .	
[Declarant Entity] hereby acknowledges that, as a result of this authorization and opting out, [Declarant Entity] will not receive any proceeds from the Current Class case.	
I do so declare under penalty of perjury.	
_____ Name/Title of Officer or Employee	_____ Date Signed

If you have any questions, you can contact the lawyer listed in Question 17 or you can talk to your own lawyer if you have questions about what this means.

10. What if I'm still not sure if I'm included?

If you are not sure whether you are a member of the Current Class or have any other questions about the Settlement, visit the website, www.NorthShoreAntitrustLitigation.com, or call the toll-free number, 1-800-952-3716. You may also send questions to the Notice and Claims Administrator at NorthShore Antitrust Litigation, c/o A.B. Data, Ltd., P.O. Box 170990 Milwaukee, WI 53217.

The Settlement Benefits

11. What does the Settlement provide?

If the Settlement is approved and becomes final, it will provide money to the members of the Current Class. NorthShore will pay \$55 million into a Settlement Fund and if the Settlement is approved by the Court, the Settlement Fund will be used to pay:

- Attorneys' fees up to 1/3 of the Settlement Fund, plus costs and expenses incurred to prosecute the Class's claims;
- Notice and administration costs;
- An incentive award to the Class Representative; and
- Eligible claims according to a Court-approved Plan of Allocation;

The Settlement Agreement, available at www.NorthShoreAntitrustLitigation.com, has more information.

12. What can I get from the Settlement?

At this time, it is unknown how much each eligible member of the Current Class will receive. Pursuant to the proposed Settlement, NorthShore will provide a Settlement Fund. The Settlement Fund, less Court-approved attorneys' fees, reimbursement of expenses, notice and administration costs, and an incentive award for the Class Representative, will be paid to eligible members of the Current Class who have not requested exclusion and who have submitted a valid Claim Form. No money will be returned to NorthShore once the Court finally approves the Settlement, and no additional money will be paid by NorthShore to the Current Class. The payment to each eligible member of the Current Class will be made *pro rata*, according to a Plan of Allocation approved by the Court.

13. What happens if there are funds remaining after distribution?

If there are any funds remaining after all claims are processed, those funds will be distributed to an organization approved by the Court. No remaining funds will be returned to NorthShore or given to any related affiliates or foundations.

14. When will I get my payment?

The Court must approve the Settlement and any appeals must be resolved before any money is distributed to members of the Current Class. The Notice and Claims Administrator must also process all the Claim Forms and determine the amount to pay each member of the Current Class. This process can take several months. Please be patient.

15. If I excluded myself, can I still get a payment?

No. You will not get a payment if you excluded yourself from the initial Class or the Current Class.

How to Get a Payment

16. How can I get a payment?

If the Court approves the Settlement, Lead Counsel will ask the Court for an award of attorneys' fees of one-third (1/3) of the Settlement Fund (plus a proportionate share of the interest and any portion of the funds received from the common benefit fund to be created pursuant to Court Order), and reimbursement of litigation expenses in the sum of \$ [redacted] incurred prior to the Settlement. Counsel will also ask for a \$50,000 incentive award for the Class Representative to be paid from the Settlement Fund for his efforts to date on behalf of the Current Class. Lead Counsel may also request additional attorneys' fees and reimbursement of expenses in connection with the administration and preservation of the Settlement Fund. If the Court grants Lead Counsel's requests, these amounts would be deducted from the Settlement Fund. You will not have to pay these fees, expenses, and costs out of your own pocket. The administrative expenses for the Settlement will also be paid out of the Settlement Fund.

To apply for a payment from the Settlement, you must complete and submit a valid Claim Form. Claim Forms should be mailed to the address below and must be postmarked by [Month 00, 2024]. You can get a Claim Form at www.NorthShoreAntitrustLitigation.com or by calling 1-800-952-3716 or writing to the address below and requesting a Claim Form.

NorthShore Antitrust Litigation
c/o A.B. Data, Ltd.
P.O. Box 170990
Milwaukee, WI 53217

You may also submit a Claim Form online at www.NorthShoreAntitrustLitigation.com. If you submit a Claim Form online, you must do so by [Month 00, 2024].

The Notice and Claims Administrator will seek to make the Settlement payments electronically, as this may be the easiest and quickest option for you to receive your money. If you received this Notice by email and would prefer to receive further

information at a different address, please update your email address with a current, valid email address. If you received a hard copy of this Notice in the mail or by any other method, please go to www.NorthShoreAntitrustLitigation.com or contact the Notice and Claims Administrator at 1-800-952-3716 to provide a current, valid email address. When you receive the email notifying you of your Settlement payment, you will be provided with several digital payment options. You will also have the opportunity to request that a check be mailed to you by the Notice and Claims Administrator. This request can be made at www.NorthShoreAntitrustLitigation.com.

The Lawyers Representing You

17. Do I have a lawyer in the case?

Yes. The Court has appointed a lawyer to represent you and the other members of the Current Class called “Lead Counsel.” You may contact Lead Counsel as follows:

LEAD COUNSEL
Marvin A. Miller Miller Law LLC 53 W. Jackson Blvd. Suite 1320 Chicago, IL 60604

You will not be charged for contacting this lawyer. If you want to be represented by another lawyer, you may hire one at your own expense.

18. How will the lawyer be paid?

Counsel for the Current Class have not been paid anything to date for their work on this case. Lead Counsel will ask the Court for attorneys’ fees of up to 1/3 of the Settlement Fund, plus costs and expenses. Lead Counsel will also ask the Court for an incentive award for the Class Representative for his work on behalf of the Current Class. Any attorneys’ fees, expenses, and costs, and an incentive award approved by the Court will be paid out of the Settlement Fund.

Objecting to the Settlement

19. How can I tell the Court if I do not like the Settlement?

You have the right to tell the Court that you do not agree with the Settlement or some part of it. The Court will consider your views.

To object, you must send a letter stating that you object to *In re: NorthShore University HealthSystem Antitrust Litigation*, No. 1:07-cv-04446. Your written objection must also include:

- Your name, address, telephone number;
- The unique ID code from your Notice (if you have one);
- A written statement describing your objection(s);
- Any documents and/or any supporting evidence;
- The name and contact information of your lawyer (if you have one);
- A statement of whether you (or your lawyer) intend to appear and speak at the Fairness Hearing; and
- Your (and, if applicable, your attorney’s) signature (you must personally sign the letter).

You must mail your objection to the following addresses, postmarked by [MONTH 00, 2024]:

Court	Lead Class Counsel	Defense Counsel
Clerk United States District Court Northern District of Illinois Eastern Division Dirksen U.S. Courthouse 219 S. Dearborn Street Chicago, IL 60604	Marvin A. Miller Miller Law LLC 53 W. Jackson Blvd. Suite 1320 Chicago, IL 60604	Dan K. Webb Winston & Strawn LLP 35 W. Wacker Drive Chicago, IL 60601

20. If I object to the Settlement, can I still file a claim (or get a payment)?

Yes. You may file a claim even if you object to, or comment on, the Settlement. Whether or not you object, you must still file a claim by the deadline in Question 16 above to receive money from the Settlement.

The Fairness Hearing

The Court will hold a hearing (called a Fairness Hearing) to decide whether to approve the Settlement. You may attend and ask to speak, but you don't have to.

21. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing on **[Month 00, 2024]** at **[0:00 x.m.]** at the United States District Court for the Northern District of Illinois, Eastern Division, Everett McKinley Dirksen U.S. Courthouse, 219 S. Dearborn Street, Courtroom 2341, Chicago, IL 60604. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.NorthShoreAntitrustLitigation.com for updates.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them and may listen to people who have asked to speak at the hearing. The Court may also decide whether to award attorneys' fees, costs, and expenses, as well as an incentive award to the Class Representative. After the hearing, the Court will decide whether to approve the Settlement and financial requests herein. We do not know how long these decisions will take.

22. Do I have to come to the hearing?

No. Lead Counsel will answer questions the Court may have at the Fairness Hearing. But you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. So long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

23. May I speak at the fairness hearing?

Yes. You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter stating that it is your "Notice of Intention to Appear in *In re: NorthShore University HealthSystem Antitrust Litigation*, No. 1:07-cv-04446." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than **[Month 00, 2024]**, and must be emailed or sent to the addresses listed in Question 19.

If You Do Nothing

24. What happens if I do nothing?

If you do nothing, you will not get any money from the Settlement and will remain in the Current Class. To receive a payment, you must complete and submit a Claim Form by **[Month 00, 2024]** (see Question 16).

Getting More Information

25. How do I get more information?

This Notice is only a summary. More details are in the Settlement Agreement, available at www.NorthShoreAntitrustLitigation.com. You also may write with questions to the Notice and Claims Administrator at NorthShore Antitrust Litigation, c/o A.B. Data, Ltd., P.O. Box 170990, Milwaukee, WI 53217 or call the toll-free number at 1-800-952-3716. Complete copies of all public pleadings, Court rulings, and other filings are available for review by accessing the Court docket for this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.ilnd.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of Illinois, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois 60604, between 8:30 a.m. and 4:30 p.m., Monday through Friday, excluding Court holidays.

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS CASE.

DATED:

BY ORDER OF THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

EXHIBIT E

NO PRINT

A COURT AUTHORIZED THIS LEGAL NOTICE

If you paid for Inpatient Hospital Services at NorthShore University HealthSystem (or Evanston Northwestern Healthcare),

You Could Get Money from a Settlement.

Your rights may be affected by proposed Settlement in a class action lawsuit with NorthShore University HealthSystem ("NorthShore"), which used to be called Evanston Northwestern Healthcare Corporation ("ENH"). The lawsuit claims that NorthShore overcharged purchasers for healthcare services after it merged with Highland Park Hospital. NorthShore denies that it did anything wrong.

NorthShore Antitrust Lit.
c/o A.B. Data, Ltd.
P.O. Box 170990
Milwaukee, WI 53217

PRE-SORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
MILWAUKEE, WI
PERMIT 3780

<<Barcode>>

Postal Service: Please do not mark barcode

Claim ID#: <<CLAIM ID>>

<<ADDRESS BLOCK>>

COMPLETE AND RETURN THE ATTACHED CLAIM FORM BY [MONTH 00, 2024], TO RECEIVE A CASH PAYMENT.

<<BARCODE>>

CONSUMER CLAIM FORM

FILL OUT EACH SECTION OF THIS FORM, SIGN WHERE INDICATED, CAREFULLY TEAR AT PERFORATION, AND MAIL. FORMS MUST BE POSTMARKED BY [MONTH 00, 2024]. YOU MAY ALSO COMPLETE YOUR CLAIM FORM ONLINE AT WWW.NORTHSHOREANTITRUSTLITIGATION.COM.

NorthShore's data shows your purchases paid directly from NorthShore for inpatient hospital services, its wholly-owned hospitals, predecessors, subsidiaries, or affiliates other than those acquired as a result of the merger with Rush North Shore Medical Center from February 10, 2000 to December 31, 2015 are \$<<insert amount>>. Purchase information for February 10, 2000 to _____ is not available from NorthShore.

If you **agree** with this information, you simply need to complete the information below, affirm and sign the attestation, and submit it by [MONTH 00, 2024]. If you do **not agree** with the purchase amount, or want to supplement your claim to include February 10, 2000 to _____ purchases, you may obtain a Supplemental Claim Form on the Settlement Website www.NorthShoreAntitrustLitigation.com, and submit them by [MONTH 00, 2024] (postmarked or submitted online), along with additional documentation to support your claim (e.g., invoices, purchase information, etc.).

PART I: CLAIMANT IDENTIFICATION. COMPLETE THIS SECTION.

NAME (FIRST, LAST): _____

STREET ADDRESS: _____

CITY: _____ STATE: _____ ZIP CODE: _____

CONTACT PHONE #: (_____) _____ - _____

EMAIL ADDRESS: _____

PART II: CLAIM UNIQUE IDENTIFIER: «CLAIMID»

PART III: CERTIFICATION. I CERTIFY THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT.

SIGNATURE: _____ DATE: ____/____/____

PRINT NAME: _____

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

NO PRINT

Am I included? Generally, you are included in the Settlement if you are in the United States or Puerto Rico and paid for inpatient hospital services directly from NorthShore (formerly called ENH), from February 10, 2000 to December 31, 2015. You may have seen a previous notice that stated purchasers of outpatient hospital services were included in the Class. The Class has changed to include only those who purchased inpatient hospital services. Some members of the original class are not members of the current Class. A more detailed notice, including the full class definition and who is not included, is available at www.NorthShoreAntitrustLitigation.com.

What does the Settlement provide? A \$55 million Settlement Fund will pay money to eligible members of the Class; notice and administration costs; incentive awards to the class representatives; and attorneys' fees, costs, and expenses.

How can I get a payment? Fill out the attached Claim Form and submit by mail postmarked by [Month 00, 2024]. You may also submit your Claim Form online at www.NorthShoreAntitrustLitigation.com. The amount of your payment will depend on the amount you paid for inpatient hospital services and the number of claims that are filed.

What are my rights? Even if you do nothing, you will be bound by the Court's decisions. If you are a member of the Current Class and did not exclude yourself or "opt out" of the original class, you may be able to exclude yourself or "opt out" of the Current Class. You may also object to the Settlement. Your objection, or request to be excluded must be submitted by [Month 00, 2024]. Details of how to request exclusion, or object, can be found at www.NorthShoreAntitrustLitigation.com. The Court will hold a hearing on [Month 00, 2024] to consider whether to approve the Settlement, a request for attorneys' fees of up to 1/3 of the Settlement Fund plus costs and expenses, and incentive awards to the class representatives. You or your own lawyer may appear and speak at the hearing at your own expense. The Court may change these deadlines or the hearing date (and time). Check the website below for updates.

For more information: 1-800-952-3716 or visit www.NorthshoreAntitrustLitigation.com

NORTHSHORE ANTITRUST LIT.
C/O A.B. DATA
P.O. BOX 170990
MILWAUKEE, WI 53217-9904

EXHIBIT F

LEGAL NOTICE

**If you paid for Inpatient Hospital Services at
NorthShore University HealthSystem (or Evanston
Northwestern Healthcare),**

You Could Get Money from a Settlement.

Your rights may be affected by a proposed Settlement in a class action lawsuit with NorthShore University HealthSystem (“NorthShore”), which used to be called Evanston Northwestern Healthcare Corporation (“ENH”). The lawsuit claims that NorthShore overcharged purchasers for healthcare services after it merged with Highland Park Hospital. NorthShore denies that it did anything wrong.

NorthShore Antitrust Litigation
c/o A.B. Data, Ltd.
P.O. Box 170990
Milwaukee, WI 53217

Postmaster: Please DO NOT Cover Up Barcode

<<Barcode>>

<<Claim ID>>

<<Mailing Address>>

Am I included? Generally, you are included in the Settlement if you are in the United States or Puerto Rico and paid for inpatient hospital services directly from NorthShore (formerly called ENH), from February 10, 2000 to December 31, 2015. You may have seen a previous notice that stated purchasers of outpatient hospital services were included in the Class. The Class has changed to include only those who purchased inpatient hospital services. Some members of the original class are not members of the current Class. A more detailed notice, including the full class definition and who is not included, is available at www.NorthshoreAntitrustLitigation.com.

What does the Settlement provide? A \$55 million Settlement Fund will pay money to eligible members of the Class; notice and administration costs; incentive awards to the class representatives; and attorneys' fees, costs, and expenses.

How can I get a payment? Submit a claim form online or by mail postmarked by [Month 00, 2024]. If your claim is valid, you may get money from the Settlement. The amount of your payment will depend on the amount you paid for inpatient hospital services and the number of claims that are filed. Detailed instructions about how to act on these rights are available at www.NorthShoreAntitrustLitigation.com.

What are my rights? Even if you do nothing, you will be bound by the Court's decisions. If you are a member of the Current Class and did not exclude yourself or "opt out" of the original class, you may be able to exclude yourself or "opt out" of the Current Class. You may also object to the Settlement. Your objection, or request to be excluded must be submitted by [Month 00, 2024]. Details of how to request exclusion, or object, can be found at www.NorthShoreAntitrustLitigation.com. The Court will hold a hearing on [Month 00, 2024] to consider whether to approve the Settlement, a request for attorneys' fees of up to 1/3 of the Settlement Fund plus costs and expenses, and incentive awards to the class representatives. You or your own lawyer may appear and speak at the hearing at your own expense. The Court may change these deadlines or the hearing date (and time). Check the website below for updates.

For more information: 1-800-952-3716 or visit www.NorthshoreAntitrustLitigation.com

EXHIBIT G

*In re: NorthShore University HealthSystem Antitrust
Litigation*

INSTRUCTIONS FOR SUBMITTING YOUR THIRD-PARTY PAYOR CLAIM FORM

A Third-Party Payor (“TPP”) member of the Class or an authorized agent can complete this Claim Form. If both a member of the Class and its authorized agent submit a Claim Form, the Notice and Claims Administrator will only consider the member of the Class's Claim Form. The Notice and Claims Administrator may ask for supporting documents in addition to the documents and information requested below. The Notice and Claims Administrator may reject a claim if the TPP member of the Class or their authorized agent does not provide all requested documents in a timely manner.

If you are a member of the Class submitting a Claim Form on your own behalf, complete “**Section A – COMPANY OR HEALTH PLAN MEMBER OF THE CLASS ONLY.**” Do not complete Section B. Complete Sections C-E of the claim form and provide any other required information.

If you are an **authorized agent** of one or more members of the Class, complete “**Section B – AUTHORIZED AGENT ONLY.**” **Do not submit a Claim Form for any member of the Class unless that member of the Class previously authorized you to submit the Claim Form on their behalf.** Do not complete Section A. Complete Sections C-E of the claim form and provide any other required information.

If you are submitting a Claim Form only as an authorized agent of one or more members of the Class, you may submit a separate Claim Form for each member of the Class OR you may submit one Claim Form for all such members of the Class if you provide the required information for each member of the Class for whom you are submitting the form.

If you are submitting Claim Forms on both your own behalf as a member of the Class AND as an authorized agent of one or more members of the Class, you should submit one Claim Form for yourself, completing Section A, and another Claim Form or Forms as an authorized agent for the other member(s) of the Class, completing Section B.

To qualify to receive a payment from the Settlement, you must complete and submit this Claim Form. You can submit your claim form by mail or electronically on the Settlement website (www.NorthShoreAntitrustLitigation.com). You may need to provide documents to verify your claim.

If you do not complete and submit your Claim Form postmarked or filed online by [Month 00, 2024], you will not get a payment from this Settlement. Submitting a Claim Form does not guarantee you will get a payment from the Settlement. If the Notice and Claims Administrator rejects or reduces your Claim, you may follow the dispute resolution process described on pages 5-6.

CLAIM INFORMATION AND DOCUMENTATION REQUIREMENTS

Please provide the following information to support your claim that from February 10, 2000 to December 31, 2015, you (or the member(s) of the Class you represent) purchased or paid directly to NorthShore University HealthSystem (formerly known as Evanston Northwestern Healthcare) (“NorthShore”) for inpatient hospital services, its wholly-owned hospitals, predecessors, subsidiaries, or affiliates other than those acquired as a result of the merger with Rush North Shore Medical Center in the United States of America and Puerto Rico:

- a) Unique patient identification number or code
- b) Date of Service – *e.g.*, 06/01/2012

- c) Hospital Location of Service – *e.g.*, Highland Park Hospital, Evanston Hospital, or Glenbrook Hospital
- d) Amount Billed (not including dispensing fee) – *e.g.*, \$1,500.00
- e) Amount Paid by TPP net of co-pays, deductibles, and co-insurance – *e.g.*, \$1,200.00

If you are submitting a Claim Form on behalf of multiple members of the Class, also provide the following information for each prescription:

- f) Plan or Group Name
- g) Plan or Group FEIN – provide group number for each transaction

For your convenience, an exemplar spreadsheet containing these categories is available and can be downloaded from the website, www.NorthShoreAntitrustLitigation.com. Please use this format if possible. Please provide the electronic data in Microsoft Excel, ASCII flat file pipe “|”, tab-delimited, or fixed-width format.

Please provide as much of the information requested above as possible. For claims of \$X00,000 or more, transaction data is mandatory. If your claim is for \$X00,000 or more, you must provide transaction data to support your claim. The Notice and Claims Administrator may also require you to provide transaction data for claims of less than \$X00,000. It is important to keep any related transaction data and other documents that support your claim (*e.g.*, invoices) in case the Notice and Claims Administrator requests additional information. If your claim is for less than \$X00,000, please provide the transaction data with your claim submission now (if you can).

If the Notice and Claims Administrator still has questions about your claim after it is audited, and you did not provide enough information or documents to verify your claim, the Notice and Claims Administrator may reject your claim.

Please contact the Notice and Claims Administrator at 1-800-952-3716 with any questions about the required claims information or documents.

**MUST BE POSTMARKED ON
OR BEFORE, OR
SUBMITTED
ONLINE BY, MONTH 00, 2024**

*NorthShore University
HealthSystem Antitrust Litigation*

THIRD-PARTY PAYOR CLAIM FORM

Use Blue or Black Ink Only

Attention: This form should only be filled out on behalf of a Third-Party Payor (or an authorized agent). If you are a Consumer, please fill out the Consumer Claim Form, available at www.NorthShoreAntitrustLitigation.com.

- Complete Section A only if you are filing as an individual TPP member of the Class.
- Complete Section B only if you are an authorized agent filing on behalf of one or more TPP Class Members.

Section A: Company or Health Plan Member of the Class Only

Company or Health Plan Name

Contact Name

Address 1

Address 2

Floor/Suite

City

State

Zip Code

Area Code - Telephone Number

Tax Identification Number

Email Address

List other names by which your company or health plan has been known or other Federal Employer Identification Numbers ("FEINs") it has used since February 10, 2000.

Health Insurance Company/HMO

Self-Insured Employee Health or Pharmacy Benefit Plan

Self-Insured Health & Welfare Fund
 Other (Explain):

Section B: Authorized Agent Only

As an authorized agent, please check how your relationship with the member(s) of the Class is best described: (You may need to provide documents demonstrating your relationship.)

Third-Party Administrator or Administrative Services Only Provider

Pharmacy Benefits Manager

Other (Explain):

Authorized Agent's Company Name

Contact Name

Address

Floor/Suite

City

State

Zip Code

Area Code - Telephone Number

Authorized Agent's Tax Identification Number

Email Address

Please list the name and FEIN of every member of the Class (*i.e.*, company or health plan) for whom you were authorized to submit this Claim Form. (Attach additional sheets to this Claim Form as needed.) Alternatively, you may submit the requested list of members of the Class's names and FEINs in an electronic format, such as in an Excel or a tab-delimited text file. Please contact the Notice and Claims Administrator to determine what formats are acceptable.

MEMBER OF CLASS'S NAME

MEMBER OF CLASS'S FEIN

Section C: Purchase Information

Please provide the total amount paid directly to NorthShore for inpatient hospital services, its wholly-owned hospitals, predecessors, subsidiaries, or affiliates other than those acquired as a result of the merger with Rush North Shore Medical Center, from February 10, 2000 to December 31, 2015, in the United States of America and Puerto Rico.

Total Amount Paid:	\$
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Authorized Agents Only: For each member of the Class for whom you are submitting this Claim Form, please provide the above information for purchases made by the member of the Class’s members, employees, insureds, participants, or beneficiaries.

Section D: Proof of Payment and Disputes Regarding Claim Amounts

Please provide as much of the information requested in the “CLAIM INFORMATION AND DOCUMENTATION REQUIREMENTS” section in the instructions as possible.

If your claim is for **\$X00,000** or more, you must provide transaction data to support your claim; it is mandatory. The Notice and Claims Administrator may also require you to provide transaction data for claims of less than **\$X00,000**. Keep any related transaction data and other documents that support your claim (e.g., invoices) in case the Notice and Claims Administrator requests additional information. If your claim is for less than **\$X00,000**, please provide the transaction data with your claim submission now (if you can).

If the Notice and Claims Administrator still has questions about your claim after it is audited, and you did not provide enough information or documents to verify your claim, the Notice and Claims Administrator may reject your claim.

If the Notice and Claims Administrator rejects or reduces your claim and you believe the rejection or reduction is in error, you may contact the Notice and Claims Administrator to request further review. If the dispute concerning your claim cannot be resolved by the Notice and Claims Administrator and Lead Counsel, you may ask the Court to review your claim.

Section E: Certification

I have read and am familiar with the content of the Instructions accompanying this Claim Form. I certify that the information I provided in this Claim Form and in any documents attached by me are true, correct, and complete to the best of my knowledge. I certify that I, or the member(s) of the Class I represent, are located within the United States or Puerto Rico and purchased or paid for inpatient hospital services directly from NorthShore University HealthSystem (formerly known as Evanston Northwestern Healthcare), its wholly-owned hospitals, predecessors, subsidiaries, or affiliates other than those acquired as a result of the merger with Rush North Shore Medical Center from February 10, 2000 to December 31, 2015.

I further certify that I, or the member(s) of the Class I represent, did not ask to be excluded (“opt out”) from the class in this lawsuit and did not submit a claim for the following: (i) Self-insured entities and businesses which paid NorthShore through third-party claims administrators acting on their behalf; (ii) Government entities; (iii) NorthShore and its present and former parents, predecessors, subsidiaries, and affiliates; (iv) Other healthcare

services providers and their present and former parents, predecessors, subsidiaries, and affiliates; (v) Other healthcare service providers who purchased or paid for inpatient hospital services directly from NorthShore, its wholly-owned hospitals, predecessors, subsidiaries, or affiliates (other than those acquired from the merger with Rush North Shore Medical Center); or (vi) Certain insurance companies required to arbitrate their claims, and Present and former parents, predecessors, subsidiaries, and/or affiliates of NorthShore.

I further certify I have provided all the requested information to the extent I have it.

I further certify that I, and the member(s) of the Class I represent, have read and are familiar with the releases stated in paragraph 10 of the Settlement Agreement and understand that by staying in the Class they give up their rights and can no longer sue or participate in any lawsuit against the Defendant in the future about the claims resolved in this lawsuit.

To the extent I was authorized to submit this Claim Form by one or more members of the Class on their behalf, and am submitting this Claim Form as an authorized agent, and to the extent I was authorized to receive any and all amounts from the Settlement Fund that may be allocated to these members of the Class on their behalf, I certify that such authority has been properly vested in me and I will fulfill all duties I may owe the member(s) of the Class. If amounts from the Settlement Fund are distributed to me, and a member of the Class later claims that I did not have the authority to claim and/or receive such amounts on its behalf, I and/or my employer will hold the class, Lead Counsel, and the Notice and Claims Administrator harmless with respect to any claims made by the member of the Class.

I hereby submit to the jurisdiction of the United States District Court for the Northern District of Illinois, Eastern Division for all purposes connected with this Claim Form, including resolving disputes related to this Claim Form. I acknowledge that if I provided any false information or representations related to this claim, I may be subject to sanctions, including criminal prosecution. If the Notice and Claims Administrator requests additional supporting documents to supplement this Claim Form and the information in it, I agree to provide them.

I certify that the above information supplied by the undersigned is true and correct to the best of my knowledge, and this Claim Form was signed this _____ day of _____ 2024.

Signature

Position/Title

Print Name

Date

Mail your completed Claim Form, along with any supporting documents as described in the CLAIM INFORMATION AND DOCUMENTATION INSTRUCTIONS on pages 1-2 above, to the address below postmarked no later than **[Month 00, 2024]** or submit the information online at the website below by that date:

NorthShore Antitrust Litigation
c/o A.B. Data, Ltd.
P.O. Box 170990
Milwaukee, WI 53217
Toll-Free Telephone: 1-800-952-3716
Website: www.NorthShoreAntitrustLitigation.com

REMINDER CHECKLIST:

1. Please complete and sign the above Claim Form or complete the online Claim Form. Attach or upload any documents that support your Claim.
2. Keep a copy of your Claim Form and supporting documents for your records.
3. If you would also like a receipt acknowledging your Claim Form was received, please complete the form online or mail this form via Certified Mail, Return Receipt Requested.
4. If you move and/or your name changes, please send your new address and/or your new name or contact information to the Notice and Claims Administrator at info@NorthShoreAntitrustLitigation.com or via U.S. Mail at the address above.