

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF
PENNSYLVANIA**

*IN RE GEISINGER SYSTEM
SERVICES AND EVANGELICAL
COMMUNITY HOSPITAL
HEALTHCARE WORKERS
ANTITRUST LITIGATION*

No. 4:21-cv-00196-MWB

Chief Judge Matthew W. Brann

**DECLARATION OF BRIAN DEVERY OF A.B. DATA IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL AND
DISSEMINATION OF SETTLEMENT CLASS NOTICE**

I, Brian Devery, declare and state as follows:

1. I am a Director of Client Services at A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. Interim Co-Lead Class Counsel for Plaintiffs and the Proposed Class ("Counsel") have retained A.B. Data to act as the Settlement Administrator and Notice Provider in this case after a competitive bidding process.

2. At the request of Counsel, I prepared a proposed notice plan ("Notice Plan") for this litigation and the settlements reached in this matter. This Declaration will describe the proposed Notice Plan and how it will meet Federal Rule of Civil Procedure 23 requirements and provide due process to Settlement class members ("Class Members"). This Declaration is based upon my personal knowledge and

upon information provided to me by Counsel, my associates, and A.B. Data staff members.

3. A.B. Data has implemented and coordinated some of the largest and most complex notice and administration plans in the country. The scope of our work includes notification, claim processing, claims adjudication, and distribution plans in all types of class actions, including in antitrust class actions like this one. A.B. Data has been appointed as notice, claims, and/or settlement administrator in hundreds of large consumer, antitrust, securities, ERISA, insurance, and government agency matters. In addition, our team has experience in administering similar types of antitrust “no-poach” settlements, such as in *Jien, et al., v. Perdue Farms, Inc.*, No. 1:19-cv-002521 (D. Md.) and *Borozny, et al., v. RTX Corporation, Pratt & Whitney Division, et al.*, No. 3:21-cv-01657 (D. Conn.). A profile of A.B. Data’s background and capabilities, including representative case and client lists, is included as **Exhibit A**.

NOTICE PLAN OVERVIEW

4. The objective of the Notice Plan is to provide notice of the Settlements with Geisinger System Services, Inc. (“Geisinger”) and Evangelical Community Hospital (“Evangelical”) to Class Members. The Class is generally defined as:

All natural persons who worked as Healthcare Workers¹ (as defined in the Settlement Agreement) at Geisinger's or Evangelical's facilities located in Union, Snyder, Northumberland, Montour, Lycoming, and Columbia counties in the Commonwealth of Pennsylvania ("Class Counties") from January 1, 2014 through August 5, 2020.²

5. The proposed Notice Plan uses customary procedures that have been widely adopted in class actions with a comprehensive list of class member data. The proposed Notice Plan includes robust direct notice via email and First-Class Mail derived from information and data provided by the Defendants, supplemental paid media, and earned media to reach additional Class Members who do not review their direct notice or otherwise do not receive a direct notice. A dedicated case-specific website and toll-free telephone number will serve as additional resources for Class Members.

DIRECT NOTICE

6. The proposed Notice Plan includes direct notice by email and, to the extent A.B. Data is unable to locate working (or valid) email addresses for potential Class Members, by First-Class Mail.

¹ Pursuant to the Settlement Agreements, "Healthcare Workers" are nurses, physicians, advanced practitioners, medical support personnel, and Other Healthcare Professionals. "Other Healthcare Professionals" are health technicians, therapists, healthcare managers, or other healthcare professionals who contribute to the healthcare system in various capacities.

² Excluded from the Settlement Class are members of Geisinger and Evangelical's boards of directors, Geisinger and Evangelical's C-Suite Executives, and any and all judges assigned to hear or adjudicate any aspect of this litigation and their judicial staff.

7. To effectuate direct notice, Defendants or Counsel will initially provide A.B. Data with a list of names and contact information for known Class Members (“Class List”). A.B. Data will utilize information databases and other standard tools to attempt to locate email addresses for Class Members for whom an email address was not provided on the Class List.

8. A.B. Data will send the Short-Form Notice, in the form of an email (“Email Notice”), to Class Members for whom a valid email address is available.

9. Prior to emailing, A.B. Data will perform several tasks to maximize deliverability. These tasks include running the list of recipient email addresses through a deliverability analysis to ensure the email addresses are valid and working with our email service providers to develop sending strategies to achieve optimal deliverability. A.B. Data will also incorporate best practices, such as excluding words or phrases known to trigger SPAM or junk filters, not including email attachments, and sending the emails in tranches over a period of days or weeks.

10. A.B. Data will also send the Short-Form Notice, formatted as a postcard (“Postcard Notice”), by First-Class Mail to Class Members with only a known mailing address and Class Members whose email addresses are determined to be invalid during the deliverability analysis or after emailing (*i.e.*, emails are undeliverable).

11. Prior to mailing, A.B. Data will standardize and update all mailing addresses through the United States Postal Service (“USPS”) national change of address (“NCOA”) database. For Class Members with a registered change of address, A.B. Data will mail a Postcard Notice to the updated mailing address provided by the USPS.

12. For any Postcard Notice returned to A.B. Data by the USPS as undeliverable as addressed (“UAA”) with a forwarding address provided, A.B. Data will promptly remail the Postcard Notice to the forwarding address. For any UAA Postcard Notice returned with no forwarding address provided, A.B. Data will search for an updated address using an information provider to which we subscribe. If an updated address is available, A.B. Data will promptly remail the Postcard Notice to the updated address.

13. The Postcard and Email Notices, attached as **Exhibits B and C**, will be in the form approved by the Court.

SUPPLEMENTAL PAID MEDIA

14. To supplement the comprehensive direct notice, A.B. Data designed a paid media plan (including digital and social media) to reach potential Class Members who do not receive the Short-Form Notice via email or mail. Ads will appear across desktop, tablet, and mobile devices for 30 days on LinkedIn and HealthcareDive.com. AB Data recommends these platforms because they

effectively reach healthcare workers in Pennsylvania. Healthcaredive.com delivers news and insights to decision-makers at regional practices, hospitals, health systems, and payers. LinkedIn is the largest professional network, allowing the ability to target and reach healthcare professionals across Pennsylvania by industry and role. Advertising will be geotargeted within Pennsylvania. All banner, newsfeed, and mobile ads will include an embedded link to the case-specific website.

EARNED MEDIA

15. A.B. Data will distribute a modified Short-Form Notice as a news release via Business Wire’s Pennsylvania Newswire. This news release will reach traditional industry, business, and trade media outlets (television, radio, newspapers, magazines), news websites, and journalists in Pennsylvania.

16. A.B. Data will also share information about the Settlements with its followers on X, also known as “Twitter.”

TOLL-FREE TELEPHONE NUMBER

17. To assist Class Members in understanding the Settlements’ terms and their rights under the Settlements, A.B. Data will establish a case-specific toll-free telephone number. The toll-free telephone number will appear in all forms of notice, including on the case-specific website. The toll-free telephone number will be equipped with an automated interactive voice response (“IVR”) system. The automated IVR system will present callers with a series of choices to hear

prerecorded information about the Settlements. If callers need further help, they will have an option to speak with a live operator during business hours and leave a message during non-business hours, which will be returned.

SETTLEMENT WEBSITE

18. A.B. Data will also implement and maintain a case-specific website for this matter. The website address will appear on all notices. The case-specific website will be simple to navigate and provide, among other things, a summary and background about the case, information about Class Member rights and options, important dates, any pertinent updates, and other relevant information. Class Members will be able to access detailed Frequently Asked Questions and download copies of key documents, to the degree they need those documents, such as the Proof of Claim and Release Form, Court documents, and the Settlement Agreements.

19. The case-specific website will also include a portal where Class Members will have the ability to enter the Unique ID and PIN provided to them on their Email and/or Postcard Notices referenced above. This portal will allow Class Members to update their mailing address, email address, and phone number and contest their total compensation data provided by Defendants, if Class Members believe that information is inaccurate in their Email and/or Postcard Notice, or if a Class Member did not receive an Email or Postcard Notice. The portal will also include functionality that will allow any Class Member who contests their total

compensation data to provide updated information and upload documentary evidence to prove any additional claimed compensation that, for whatever reason, did not appear in the compensation data that Plaintiffs received as part of the case.

20. In addition, the website will also contain a claims-filing portal to allow Class Members who may not have received (or misplaced their notice), to submit a generic Proof of Claim and Release Form online. Information provided through the claims filing portal will be compared against the comprehensive payroll data that was produced during the litigation. Class Members may also call or email the Settlement Administrator to get their Unique ID and PIN.

21. The case-specific website will be secure, with an “https” designation.

NOTICE FORM & CONTENT

22. The detailed Long-Form Notice (attached as **Exhibit D**) and Short-Form Notice include all required information about Class Members’ rights and options and comply with the notice requirements in Federal Rule of Civil Procedure Rule 23. They are designed to encourage readership and understanding in a well-organized and reader-friendly format.

23. The Short-Form Notice in the form of emails and postcards, will be used to provide notice of the proposed Settlements. The Short-Form Notice provides a clear, plain language summary about the litigation, the proposed Settlements, and Class Members’ rights and options. The Short-Form Notice has a large, bold

headline, and individuals can easily determine if they are included in the Class. This notice also includes the case-specific website address and toll-free telephone number, so Class Members can obtain additional details about the case and background information.

24. The detailed Long-Form Notice includes more substantial information about the litigation and how Class Members can act with respect to their rights and options. 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 Class Members to find and understand the relevant information.

EXCLUSION PROCESSING

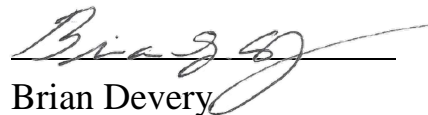
25. The Long-Form and Short Form Notices, along with the Frequently Asked Questions (“FAQ”) section of the case-specific website include instructions on how to request exclusion from the Settlements. A.B. Data will receive, process, and report all exclusion requests and circulate copies to the parties.

CONCLUSION

26. It is my opinion, based on my individual expertise and experience, and that of my A.B. Data colleagues, that the proposed Notice Plan described herein is designed to effectively reach Class Members and will deliver plain language notices that will capture Class Members’ attention and provide them with the necessary information to effectively understand their rights and options in an informative and

easy to understand manner. This proposed Notice Plan conforms to the standards employed by A.B. Data in similar notification plans. Based on my experience in other class action cases, it is my opinion that this Notice Plan, with a combination of comprehensive direct notice along with paid and earned media, will exceed a 70% reach³ of the Class. This reach is similar to those that courts have approved previously and within the range recommended and considered reasonable by The Federal Judicial Center's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*.⁴ For all these reasons, in my opinion, the proposed Notice Plan is the best practicable under the circumstances and satisfies the requirements of Federal Rule of Civil Procedure 23 and due process.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 3rd day of October in Oakdale, New York.


Brian Devery

³ Reach is the estimated percentage of a target audience reached through a specific (media) vehicle or combination of (media) vehicles.

⁴ 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%."

EXHIBIT A

Class
Action
Administration



Headquarters
600 A.B. Data Drive
Milwaukee, WI 53217
P: 866-217-4470
F: 414-961-3099

New York
One Battery Park Plaza
32nd Floor
New York, NY 10004
P: 646-290-9137

Washington DC
915 15th St., NW, Ste. 300
Washington, DC 20005
P: 202-618-2900
F: 202-462-2085


Florida
5080 PGA Boulevard, Ste. 209
Palm Beach Gardens, FL 33418
P: 561-336-1801
F: 561-252-7720

Israel
19 Weissburg Street
Tel Aviv 69358
Israel
P: +972 (3) 720-8782

London
71-75 Shelton Street
Covent Garden
London, WC2H 9JQ
P: +44 20 4586 1892


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.

Justin Parks, Senior 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.

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.

Steve Straub, Vice President, 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 Vice President of Operations, 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 PPDAI 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. Rhinoag, 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 B

Legal Notice

**NOTICE OF CLASS ACTION
SETTLEMENTS**

**\$28.5 million in settlements will provide
payments to healthcare workers at
Geisinger and Evangelical facilities in
Central Pennsylvania.**

Records show that you may be a Class Member.
Please read this Notice carefully.

There are Settlements totaling \$28.5 million in a class action lawsuit that alleges Geisinger System Services, Inc. (“Geisinger”) and Evangelical Community Hospital (“Evangelical”) agreed not to recruit (or “poach”) each other’s healthcare workers. The lawsuit further alleged that this agreement allowed Geisinger and Evangelical to pay employees lower salaries than they would have received otherwise. Geisinger and Evangelical deny the allegations and do not admit any liability related to the allegations as part of this settlement.

XXXXXXXXXXXX

c/o A.B. Data, Ltd.

P.O. Box 0000

Milwaukee, WI 53217

Unique ID: **XXX12345**

PIN: **ABC123**

[Barcode]

Notice ID : 123456789

Name

Address 1

Address 2

City, State, Zip

Who is included in the Settlements? Generally, you are member of the Settlement Class and included in the settlements if you are a person who worked as a Healthcare Worker at Geisinger's or Evangelical's facilities located in Union, Snyder, Northumberland, Montour, Lycoming, and/or Columbia counties in Pennsylvania at some point from January 1, 2014 through August 5, 2020. Healthcare Workers are nurses, physicians, advanced practitioners, medical support personnel, and other healthcare professionals (technicians, therapists, healthcare managers, or other healthcare professionals who contribute to the healthcare system in various capacities). You may be entitled to money if you are included.

What do the Settlements provide? Geisinger agreed to pay \$19 million and Evangelical agreed to pay \$9.5 million to settle this lawsuit. The \$28.5 million Settlement Fund will pay money to eligible members of the Settlement Class, attorneys' fees and expenses, notice and settlement administration costs, taxes and tax expenses, and class representative service awards.

How can I get a payment? Defendants' records show you earned \$<<**EARNINGS**>> as a healthcare professional employed by Geisinger, Evangelical, or both. Your earnings will be used to determine your proportional (or *pro rata*) share of the Settlement. All valid Class Members will receive a minimum \$250 payment. Your payment will be automatically sent you by email (to the email address on record). If you believe that these earnings are incorrect or would like to update your email address, mailing address, or other information, go to the Settlement website, www.XXXXXXXXXX.com, log in using the Unique ID and PIN (on this notice), and follow the steps to submit your changes.

You do not need to take action to get a payment.

What are my rights? Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue Geisinger and/or Evangelical yourself, you must exclude yourself from the Settlements by **[Month 00, 2025]**. If you stay in the Settlements, you may object to them by **[Month 00, 2025]**. Detailed information about how to exclude yourself or object is available on the website. The Court will hold a hearing on **[Month 00, 2025]** to consider if it will approve the Settlements and a request for attorneys' fees up to 33.33% of the Settlement Fund, plus a proportional share of interest; litigation costs and expenses up to \$3,500,000; and a service award up to \$10,000 for each class representative (\$20,000 total). You or your own lawyer may appear and speak at the hearing at your own expense.

If you have additional or updated contact information, please complete and return the below:

Name

Address

City

State

Zip Code

Email Address

Phone Number

<<BARCODE>>

NOTICE ID: <<NOTICEID>>

XXXXXXXXXXXXX

C/O A.B. DATA, LTD.

P.O. BOX 0000

MILWAUKEE, WI 53217

Legal Notice

**NOTICE OF CLASS ACTION
SETTLEMENTS**

**\$28.5 million in settlements will provide
payments to healthcare workers at
Geisinger and Evangelical facilities in
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Please read this Notice carefully.

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XXXXXXXXXXXX

c/o A.B. Data, Ltd.

P.O. Box 0000

Milwaukee, WI 53217

Unique ID: **XXX12345**

PIN: **ABC123**

[Barcode]

Notice ID : 123456789

Name

Address 1

Address 2

City, State, Zip

Who is included in the Settlements? Generally, you are member of the Settlement Class and included in the settlements if you are a person who worked as a Healthcare Worker at Geisinger's or Evangelical's facilities located in Union, Snyder, Northumberland, Montour, Lycoming, and/or Columbia counties in Pennsylvania at some point from January 1, 2014 through August 5, 2020. Healthcare Workers are nurses, physicians, advanced practitioners, medical support personnel, and other healthcare professionals (technicians, therapists, healthcare managers, or other healthcare professionals who contribute to the healthcare system in various capacities). You may be entitled to money if you are included.

What do the Settlements provide? Geisinger agreed to pay \$19 million and Evangelical agreed to pay \$9.5 million to settle this lawsuit. The \$28.5 million Settlement Fund will pay money to eligible members of the Settlement Class, attorneys' fees and expenses, notice and settlement administration costs, taxes and tax expenses, and class representative service awards.

How can I get a payment? Defendants' records show you earned \$<<**EARNINGS**>> as a healthcare professional employed by Geisinger, Evangelical, or both. Your earnings will be used to determine your proportional (or *pro rata*) share of the Settlement. All valid Class Members will receive a minimum \$250 payment. Your payment will be automatically sent you by email (to the email address on record). If you believe that these earnings are incorrect or would like to update your email address, mailing address, or other information, go to the Settlement website, www.XXXXXXXXXX.com, log in using the Unique ID and PIN (on this notice), and follow the steps to submit your changes.

You MUST complete a W-9 to get a payment.

What are my rights? Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue Geisinger and/or Evangelical yourself, you must exclude yourself from the Settlements by **[Month 00, 2025]**. If you stay in the Settlements, you may object to them by **[Month 00, 2025]**. Detailed information about how to exclude yourself or object is available on the website. The Court will hold a hearing on **[Month 00, 2025]** to consider if it will approve the Settlements and a request for attorneys' fees up to 33.33% of the Settlement Fund, plus a proportional share of interest; litigation costs and expenses up to \$3,500,000; and a service award up to \$10,000 for each class representative (\$20,000 total). You or your own lawyer may appear and speak at the hearing at your own expense.

If you have additional or updated contact information, please complete and return the below:

Name

Address

City	State	Zip Code
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Email Address

Phone Number

<<BARCODE>>

NOTICE ID: <<NOTICEID>>

XXXXXXXXXXXXX

C/O A.B. DATA, LTD.

P.O. BOX 0000

MILWAUKEE, WI 53217

EXHIBIT C

Subject: Notice of Class Action Settlement: Geisinger and Evangelical
From: Help@ABData.com

NOTICE OF CLASS ACTION SETTLEMENTS

You may be able to get money from \$28.5 million in Settlements for Healthcare Workers at Geisinger and Evangelical facilities in Central Pennsylvania

Unique ID: ABCD12345
PIN: TD45A

Records show that you may be a Class Member. Please read this Notice carefully.

There are Settlements totaling \$28.5 million in a class action lawsuit that alleges Geisinger System Services, Inc. ("Geisinger") and Evangelical Community Hospital ("Evangelical") agreed not to recruit (or "poach") each other's healthcare workers. The lawsuit further alleged that this agreement allowed Geisinger and Evangelical to pay employees lower salaries than they would have received otherwise. Geisinger and Evangelical deny the allegations and do not admit any liability related to the allegations as part of this settlement.

Who is included in the Settlements?

Generally, you are member of the Settlement Class and included in the settlements if you are a person who worked as a Healthcare Worker at Geisinger's or Evangelical's facilities located in Union, Snyder, Northumberland, Montour, Lycoming, and/or Columbia counties in Pennsylvania at some point from January 1, 2014 through August 5, 2020. Healthcare Workers are nurses, physicians, advanced practitioners, medical support personnel, and other healthcare professionals (technicians, therapists, healthcare managers, or other healthcare professionals who contribute to the healthcare system in various capacities). You may be entitled to money if you are included.

What do the Settlements provide?

Geisinger agreed to pay \$19 million and Evangelical agreed to pay \$9.5 million to settle this lawsuit. The \$28.5 million Settlement Fund will pay money to eligible members of the Settlement Class, attorneys' fees and expenses, notice and settlement administration costs, taxes and tax expenses, and class representative service awards.

How can I get a payment?

Defendants' records show you earned \$XXXXXX as a healthcare professional employed by Geisinger, Evangelical, or both. Your earnings will be used to determine your proportional (or *pro rata*) share of the Settlement. All valid Class Members will receive a minimum \$250 payment.

Your payment will be automatically sent to you by email (to the email address this notice was sent to).

If you believe that these earnings are incorrect or would like to update your email address, mailing address, or other information, go to the Settlement website, www.XXXXXXXX.com, log in using the Unique ID and PIN (on the top of this notice), and follow the steps to submit your changes.

You do not need to take action to get a payment.

What are my Rights?

Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue Geisinger and/or Evangelical yourself, you must exclude yourself from the Settlements by **[Month 00, 2025]**. If you stay in the Settlements, you may object to them by **[Month 00, 2025]**. Detailed information about how to exclude yourself or object is available on the website.

The Court will hold a hearing on **[Month 00, 2025]** to consider if it will approve the Settlements and a request for attorneys' fees up to 33.33% of the Settlement Fund, plus a proportional share of interest (33.33%); litigation costs and expenses up to \$3,500,000; and a service award up to \$10,000 for each class representative (\$10,000 total). You or your own lawyer may appear and speak at the hearing at your own expense.

For More Information

Visit [website]

Call 1-800-000-0000

Subject: Notice of Class Action Settlement: Geisinger and Evangelical
From: Help@ABData.com

NOTICE OF CLASS ACTION SETTLEMENTS

You may be able to get money from \$28.5 million in Settlements for Healthcare Workers at Geisinger and Evangelical facilities in Central Pennsylvania

Unique ID: ABCD12345
PIN: TD45A

Records show that you may be a Class Member. Please read this Notice carefully.

There are Settlements totaling \$28.5 million in a class action lawsuit that alleges Geisinger System Services, Inc. (“Geisinger”) and Evangelical Community Hospital (“Evangelical”) agreed not to recruit (or “poach”) each other’s healthcare workers. The lawsuit further alleged that this agreement allowed Geisinger and Evangelical to pay employees lower salaries than they would have received otherwise. Geisinger and Evangelical deny the allegations and do not admit any liability related to the allegations as part of this settlement.

Who is included in the Settlements?

Generally, you are member of the Settlement Class and included in the settlements if you are a person who worked as a Healthcare Worker at Geisinger's or Evangelical's facilities located in Union, Snyder, Northumberland, Montour, Lycoming, and/or Columbia counties in Pennsylvania at some point from January 1, 2014 through August 5, 2020. Healthcare Workers are nurses, physicians, advanced practitioners, medical support personnel, and other healthcare professionals (technicians, therapists, healthcare managers, or other healthcare professionals who contribute to the healthcare system in various capacities). You may be entitled to money if you are included.

What do the Settlements provide?

Geisinger agreed to pay \$19 million and Evangelical agreed to pay \$9.5 million to settle this lawsuit. The \$28.5 million Settlement Fund will pay money to eligible members of the Settlement Class, attorneys’ fees and expenses, notice and settlement administration costs, taxes and tax expenses, and class representative service awards.

How can I get a payment?

Defendants’ records show you earned \$XXXXXX as a healthcare professional employed by Geisinger, Evangelical, or both. Your earnings will be used to determine your proportional (or *pro rata*) share of the Settlement. All valid Class Members will receive a minimum \$250 payment.

To get a payment, you **MUST** go to the Settlement website, www.XXXXXXXXXX.com, log in using the Unique ID and PIN (on the top of this notice), and complete a substitute W-9. Your payment amount is considered wages and must be reported to the Internal Revenue Service. Please also review and update your email address, mailing address, and other information as needed.

You MUST complete a W-9 to get a payment.

What are my Rights?

Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue Geisinger and/or Evangelical yourself, you must exclude yourself from the Settlements by **[Month 00, 2025]**. If you stay in the Settlements, you may object to them by **[Month 00, 2025]**. Detailed information about how to exclude yourself or object is available on the website.

The Court will hold a hearing on **[Month 00, 2025]** to consider if it will approve the Settlements and a request for attorneys' fees up to 33.33% of the Settlement Fund, plus a proportional share of interest (33.33%); litigation costs and expenses up to \$3,500,000; and a service award up to \$10,000 for each class representative (\$20,000 total). You or your own lawyer may appear and speak at the hearing at your own expense.

For More Information

Visit [website]

Call 1-800-000-0000

EXHIBIT D

NOTICE OF CLASS ACTION SETTLEMENTS

You may be able to get money from \$28.5 million in settlements for Healthcare Workers at Geisinger and Evangelical facilities in Central Pennsylvania

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

- The Court has preliminarily approved settlements totaling \$28.5 million to a class of Healthcare Workers at Geisinger System Services, Inc. (“Geisinger”) and Evangelical Community Hospital (“Evangelical”) facilities in central Pennsylvania (“Settlements”). This class action lawsuit alleges that the Defendants, Geisinger and Evangelical, agreed not to recruit (or “poach”) each other’s Healthcare Workers. It is further alleged that this agreement reduced competition, making it harder for healthcare workers to switch jobs, and allowed Defendants to pay employees lower compensation than they would have received otherwise. Geisinger and Evangelical deny the allegations and do not admit any liability related to the allegations as part of this settlement.
- Geisinger and Evangelical agreed to Settlements to resolve the claims against them in this lawsuit, *In re Geisinger System Services and Evangelical Community Hospital Healthcare Workers Antitrust Litigation*, No. 4:21-cv-00196 (M.D. Pa.). Under the Settlements, Geisinger agreed to pay \$19 million, and Evangelical agreed to pay \$9.5 million.
- Generally, you are member of the Settlement Class and included in the settlements if you are a person who worked as a Healthcare Worker¹ (*see* Question 6) at Geisinger's or Evangelical's facilities located in Union, Snyder, Northumberland, Montour, Lycoming, and/or Columbia counties in Pennsylvania at some point from January 1, 2014 through August 5, 2020. Excluded from the Settlement Class are members of Geisinger’s and Evangelical’s boards of directors, Geisinger’s and Evangelicals C-Suite Executives,² and any and all judges assigned to hear or adjudicate any aspect of this litigation and their judicial staff. You may be entitled to money if you are included.
- The \$28.5 million Settlement Fund will pay (1) money to eligible members of the Settlement Class; (2) attorneys’ fees and expenses to the lawyers that litigated the case; (3) notice and settlement administration costs; (4) taxes and tax expenses; and (5) class representative service awards.
- **Your legal rights are affected even if you do nothing. Please read this notice carefully. It explains the Settlements and the rights and options of members of the Settlement Class in this class action lawsuit.**

¹ “Healthcare Workers” are nurses, physicians, advanced practitioners, medical support personnel, and Other Healthcare Professionals. “Other Healthcare Professionals” are technicians, therapists, healthcare managers, or other healthcare professionals who contribute to the healthcare system in various capacities. Settlement Agreements ¶¶ 1(t), (x).

² “C-Suite Executives” are executives responsible for day-to-day operation of either Geisinger or Evangelical with job titles including, but not limited to, “Chief,” “Executive,” “CMO,” “CNO,” and “President.” They are identifiable via Defendants’ wage data. Settlement Agreements ¶ 1(i).

YOUR LEGAL RIGHTS AND OPTIONS	
RECEIVE PAYMENT OR FILE A CLAIM	<p>If you received a notice by mail or email, you are automatically included in the Settlement Class and do not need to submit a Proof of Claim and Release Form to receive payment. You are, however, encouraged to use the Unique Identifier and PIN number provided on your notice to go on the Settlement website to verify that your name, address, and work information are correct.</p> <p>If your notice states in the “How Can I Get a Payment” section that you must complete IRS Form W-9, please use the Unique ID and PIN provided in your notice to complete and submit IRS Form W-9 for tax reporting purposes. This action can be completed as part of the update process noted above on the Settlement website. If you fall into this category, you must complete and submit IRS Form W-9 in order to receive a payment. You must do so by [Month 00, Year]</p> <p>If you did not receive notice in the mail or by email but believe you are a member of the Settlement Class, completing a Proof of Claim and Release Form is the only way you can get money. You must timely submit a valid Proof of Claim and Release Form. Your Proof of Claim and Release Form must be submitted online or postmarked no later than [Month 00, Year]. <i>See</i> Question 13 for more information.</p> <p>Give up your rights to sue Geisinger and Evangelical about the claims in this lawsuit.</p>
EXCLUDE YOURSELF	<p>If you opt-out or exclude yourself, you will get no money from the Settlements. This is the only option that allows you to be part of any other lawsuit against Geisinger and/or Evangelical about the claims in this lawsuit. <i>See</i> Question 17 for more information.</p>
OBJECT	<p>If you do not opt out (or exclude yourself) and you want to object to some part of the Settlements, you may write to the Court explaining what you find objectionable or what you don’t like. <i>See</i> Question 22 for more information.</p>
GO TO A HEARING	<p>Ask to speak in Court about fairness of the Settlements. <i>See</i> Question 25 for more information.</p>
DO NOTHING	<p>Get no payment. Give up your right to sue Geisinger and Evangelical about the claims in this lawsuit. <i>See</i> Question 28 for more information.</p>

- These rights and options—and the deadlines to exercise them—are explained in this notice.
- For the full Settlement terms, you should look at the Settlement Agreements available at [settlement website].
- The Court in charge of this case still has to decide whether to approve the Settlements.
- Payments will only be made if the Court grants final approval of the Settlements and after appeals, if any, are resolved. Please be patient.
- Please check [case website] for any updates relating to the Settlements or the Settlement approval process.

QUESTIONS? CALL TOLL-FREE 1-800-000-0000 OR VISIT [WEBSITE]

Basic Information

1. Why did I get a notice?

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

Chief Judge Matthew W. Brann of the United States District Court for the Middle District of Pennsylvania is presiding over this case. This lawsuit is currently known as *In re Geisinger System Services and Evangelical Community Hospital Healthcare Workers Antitrust Litigation*, No. 4:21-cv-00196. The people who sued or started the lawsuit are called the “Plaintiffs.” The Plaintiffs are Nichole Leib and Kevin Brokenshire. Geisinger and Evangelical are the “Defendants.”

2. What is this lawsuit about?

The lawsuit alleges that Defendants Geisinger and Evangelical made an agreement to not recruit (or “poach”) each other’s Healthcare Workers. The lawsuit also alleges that this agreement reduced competition, made it harder for Healthcare Workers to switch jobs, and allowed Defendants to pay healthcare workers lower compensation than they would have received in an otherwise fully competitive labor market. Geisinger and Evangelical deny the allegations and do not admit any liability related to the allegations as part of this settlement.

You may obtain more information regarding the specific allegations of the action by reviewing the Consolidated Amended Complaint, available at [\[website\]](#).

3. Why is this a class action?

In a class action, one or more people called “class representatives” sue on behalf of themselves and other people who have similar claims. Together, all of these people are a “class” or “class members.” In this case, the class representatives are Plaintiffs Nichole Leib and Kevin Brokenshire. One court resolves the issues for all class members, except for those who exclude themselves from the Settlement Class.

For purposes of these Settlements, the Court has certified the Settlement Class (*see* Question 5). This means that if the Court approves these Settlements, they will apply to all members of the Settlement Class (except members of the Settlement Class who exclude themselves).

4. Why are there Settlements?

Plaintiffs and Settlement Class Counsel (“Counsel”) believe that the members of the Settlement Class have been damaged by Defendants’ conduct, as described in the Consolidated Complaint.

The parties agreed to settle this case only after several years of extensive litigation and the close of fact and expert discovery. Plaintiffs and Counsel believe the Settlements are best for all members of the Settlement Class. If the Settlements are approved, Plaintiffs and the Settlement Class will dismiss and release their claims against Defendants and certain other Released Parties (identified in the Settlement Agreements).

Am I Part of the Settlements?

If you received a postcard or email notice, then you are a member of the Settlement Class. But even if you did not, you may be a member of the Settlement Class, as described below.

5. Who is included in the Settlements?

You are included in the Settlements if you are a person who worked as a Healthcare Worker (*see* Question 6) at Geisinger’s or Evangelical’s facilities located in Union, Snyder, Northumberland, Montour, Lycoming, and Columbia counties in the Commonwealth of Pennsylvania (“Class Counties”) at some point from January 1, 2014 through August 5, 2020.

QUESTIONS? CALL TOLL-FREE 1-800-000-0000 OR VISIT [\[WEBSITE\]](#)

Excluded from the Settlement Class are members of Geisinger's and Evangelical's boards of directors, Geisinger's and Evangelical's C-Suite Executives (responsible for day-to-day operation with job titles such as "Chief," "Executive," "CMO," "CNO," and "President") and any and all judges assigned to hear or adjudicate any aspect of this litigation and their judicial staff. Also excluded from the Settlement Class is anyone who timely and validly excludes themselves from the Settlement Class. *See* Question 17.

6. Who is a Healthcare Worker in these Settlements?

In this case, Healthcare Workers are nurses, physicians, advanced practitioners, medical support personnel, and other healthcare professionals. "Other healthcare professionals" include health technicians, therapists, healthcare managers, or other healthcare professionals who contribute to the healthcare system in various capacities.

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

If you are not sure whether you are a member of the Settlement Class, or have any other questions about the Settlements, visit the website, [website], email info@[website] or call the toll-free number, 1-800-000-0000. You may also send questions by mail to the Settlement Administrator at XXXXXXXXXX, c/o A.B. Data, Ltd., P.O. Box 0000, Milwaukee, WI 53217.

The Settlement Benefits

8. What do the Settlements provide?

If the Settlements are approved and become final, they will provide money to members of the Settlement Class. Geisinger will pay \$19 million and Evangelical will pay \$9.5 million into a Settlement Fund. The total Settlement amount is \$28.5 million. If the Settlements are approved by the Court, the Settlement Fund will be used to pay:

- Money to eligible members of the Settlement Class;
- Attorneys' fees and expenses;
- Notice and administration costs;
- Taxes and tax expenses; and
- Service awards to the Class Representatives

The Settlement Agreements, available at [website], have more information.

9. How much money will I get from the Settlements?

Members of the Settlement Class will receive a minimum \$250 payment. Additionally, your earnings will be used to determine your *pro rata* (or proportional) share of the settlement proceeds based on the level of your compensation during the relevant period, after deduction of attorneys' fees, expenses, litigation costs, taxes, notice and administration costs, service awards to the Class Representatives and allocation of the minimum payment (\$250) to Class Members. At this time, it is unknown how much each member of the Settlement Class will receive in a *pro rata* share. If the Court approves the Settlements and you received a notice by mail or email (or you submitted a valid and timely claim), meet the criteria to be a member of the Settlement Class, and do not opt-out (or exclude yourself) (*see* Question 17), you will receive money from the Settlements.

The amount of money you will receive depends on the number of valid claims and your total compensation at Geisinger and/or Evangelical. At this time, it is estimated that each member of the Settlement Class who is automatically included or submits a valid claim will receive a minimum payment of at least \$250, plus a *pro rata* share of the Settlement Fund based on their total compensation at Geisinger and/or Evangelical.

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

If there are any funds remaining after all claims are processed and an initial distribution has been made, those funds will be redistributed to eligible members of the Settlement Class or distributed to a non-profit organization, as approved by the Court. No remaining funds will be returned to Geisinger or Evangelical.

11. When will I get my payment?

Eligible members of the Settlement Class will receive their payments after the Court grants final approval of the Settlements and any appeals are resolved. If there are appeals, resolving them can take time. Please be patient.

12. What am I giving up to stay in the Settlements?

Unless you exclude yourself, you will give up your right to separately sue Geisinger and/or Evangelical about the claims in this lawsuit. All of the Court's decisions will bind you. The Settlement Agreements describe the specific claims you will give up (or "release"), so read it carefully. The Settlement Agreements are available at [\[website\]](#); paragraph 1(bb) of the Settlement Agreements relate to "Released Claims." If you have any questions, you can talk to the lawyers listed in Question 20 for free, or you can talk to your own lawyer if you have questions about what this means.

How to Get a Payment

13. How can I get a payment?

If you received a notice by mail or email with a claim number and your total compensation during the relevant period was included in that notice, you are automatically included in the Settlement Class and do not need to submit a Proof of Claim and Release Form in order to receive payment. You are encouraged to use the Unique Identifier and PIN number provided on your notice to verify that your name, address, and work information are correct. However, if you wish to challenge the amount calculated as your compensation during the period, which will be utilized to calculate your *pro rata* Settlement payment, you will need to contact the Settlement Administrator and provide evidence to support your claim. You must do so by [\[Month 00, Year\]](#). If you do not challenge the compensation communicated to you in the notice, you will automatically receive your Settlement payment based on that calculated compensation and the resulting *pro rata* share.

Additionally, if your notice reflects in the "How Can I Get a Payment" section that you must complete IRS Form W-9, you must use the Unique Identifier and PIN number provided on your notice to access the online claim portal, verify that your name, address, and work information are correct and submit IRS Form W-9 for tax reporting purposes to receive your Settlement payment. If your notice requires you to complete and submit an IRS Form W-9 but you do not do so, you will **not** get a Settlement payment. You must do so by [\[Month 00, Year\]](#).

If you did not receive a notice by mail or email but believe you are included in the Settlement Class, you may contact the Settlement Administrator by email at info@XXXXXXXXX.com and the Settlement Administrator will attempt to locate your information and provide your Unique ID and PIN. If the Settlement Administrator is unable to locate your records, you will need to complete and submit a Proof of Claim and Release Form. You can download or complete a Proof of Claim and Release Form at [\[website\]](#) or request one be sent to you by emailing at info@XXXXXXXXX.com or calling [1-800-000-0000](tel:1-800-000-0000).

You must submit your Proof of Claim and Release Form or review/update your information online at [\[website\]](#), or by mail postmarked, no later than [\[Month 00, Year\]](#).

Claims submitted by mail should be sent to.

[XXXXXXXXXXXXX](#)
c/o A.B. Data, Ltd.
P.O. Box 0000
[Milwaukee, WI 53217](#)

14. Who determines the value of my claim?

After it receives your timely submitted Proof of Release and Claim Form, the Settlement Administrator will decide if your claim is valid and will use your compensation to calculate any additional *pro rata* share of the Settlement in accordance with terms outlined in Question 13 above.

If you are a member of the Settlement Class who received a notice by mail or email that included your total compensation during the relevant period, please review your notice carefully to ensure you are not required to submit an IRS Form W-9 (see Question 13 above). You do not need to do anything to receive Settlement payment unless you are required to provide an IRS Form W-9 or want to challenge the compensation reflected in your email or postcard notice.

15. Should I use a company to help me file my claim?

You do not have to use a company to file a claim. You can get free help. Some companies may offer to help you file your Claim Form in exchange for a portion of your recovery from the Settlements. While you may choose to use such a company, you should know that you can file with the Settlement Administrator on your own, free of charge. Additionally, you may contact the Settlement Administrator or Counsel (see Question 20) who will help you understand and file your Claim Form—again, at no cost to you.

16. Is this money taxable and who pays the taxes?

Yes. This money is taxable. Any money you receive will be treated as wages, subject to applicable tax withholding, and will be reported to the taxing authorities and you on an IRS Form W-2. Any required payroll taxes will be withheld from your payment and paid by the Settlement Administrator. If you are required to file a Proof of Claim and Release Form, you must provide a valid IRS Form W-9 as part of the claim filing process. Check with a tax professional if you have any questions.

Excluding Yourself From the Settlements

If you don't want a payment from these Settlements, but you want to keep the right to sue or continue to sue Geisinger and/or Evangelical on your own about the claims in this lawsuit, then you must take steps to exclude yourself from the Settlements. This is called excluding yourself – or it is sometimes referred to as “opting out.”

17. How can I get out of the Settlements?

To exclude yourself, you must write to the Settlement Administrator by [Month 00, Year]. Your exclusion request letter must include:

- Your full legal name, address, email and telephone number;
- The unique ID code from your notice (if you have one);
- A statement that you want to be excluded from *In re Geisinger System Services and Evangelical Community Hospital Healthcare Workers Antitrust Litigation* Settlements;
- A statement that you understand that if you exclude yourself, you will not be able to get any money or benefits from the Settlements with Geisinger and Evangelical under the Settlement Agreements;
- Your (or your officer's or legal representative's) signature.

You must mail your exclusion request, so it is received no later than [Month 00, Year] to:

XXXXXXXXXXXX
EXCLUSIONS
P.O. Box 173001
Milwaukee, WI 53217

18. If I exclude myself, can I still get a payment?

No. You will not get a payment if you exclude yourself.

19. If I don't exclude myself, can I sue Geisinger or Evangelical for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Geisinger and Evangelical for the claims these Settlements resolve.

The Lawyers Representing You

20. Do I have a lawyer in the case?

Yes. The Court has appointed attorneys at the firms Cotchett, Pitre & McCarthy, LLP and Berger Montague PC to represent you and the other members of the Settlement Class. These attorneys are called Interim Co-Lead Class Counsel for Plaintiffs and the Proposed Class and Settlement Class Counsel. You may contact Counsel as follows:

Adam J. Zapala Cotchett, Pitre & McCarthy, LLP 840 Malcolm Road, Suite 200 Burlingame, CA 94010	Eric L. Cramer Berger Montague PC 1818 Market Street, Suite 3600 Philadelphia, PA 19103
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You will not be charged for contacting these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

21. How will the lawyers be paid?

To date, Counsel have not been paid any attorneys' fees or reimbursed for any out-of-pocket costs or expenses that Counsel spent to litigate this case. Any attorneys' fees and costs and expenses will be awarded only as approved by the Court in amounts determined to be fair and reasonable. By [Month 00, Year], Counsel will move for an award of attorneys' fees not to exceed 33.33% of the Settlement Fund, plus a proportional share of accrued interest (33.33%), reimbursement of litigation costs and expenses not to exceed \$3,500,000, and a service award of up to \$10,000 for each Class Representative (\$20,000 total) to be paid out of the Settlement Fund. If the Court grants 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.

Any motions in support of the above requests will be available on the Settlement Website after they are filed on [Month 00, Year]. After that time, if you wish to review the motion papers, you may do so by viewing them at [website].

Objecting to the Settlements

22. How can I tell the Court if I do not like any aspect of the Settlements?

You have a right to object to any part of the proposed Settlements, plan of allocation, and/or the request for attorneys' fees, expenses, and service awards. The Court will consider your views. You can't ask the Court to order different Settlements; the Court can only approve or reject the Settlements. If the Court does not approve the Settlements, no Settlement payments will be made, and the lawsuit will continue. If that is what you want to happen, you may object.

To object, you must send a letter to the addresses below that includes the following:

- Your full legal name, address, email and telephone number;
- The unique ID code from your notice (if you have one);
- A statement saying that you object to the Geisinger Settlement, Evangelical Settlement, or both Settlements in *In re Geisinger System Services and Evangelical Community Hospital Healthcare Workers Antitrust Litigation*, No. 4:21-cv-00196;
- Proof of membership in the Settlement Class, such as your Geisinger or Evangelical Employee ID or a copy of a Geisinger or Evangelical paycheck or paystub;

QUESTIONS? CALL TOLL-FREE 1-800-000-0000 OR VISIT [WEBSITE]

- The reason(s) you object;
- Any documents and/or any supporting evidence;
- Your name and address, along with 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 (or your officer's or legal representative's) signature.

You must mail your objection to the following addresses, so it is received no later than **[MONTH 00, Year]**:

Court	Class Counsel	Administrator
Clerk of Court U.S. District Court Middle District of Pennsylvania U.S. Courthouse and Federal Office Building 240 West Third Street, Suite 218 Williamsport, PA 17701	Adam J. Zapala Cotchett, Pitre & McCarthy, LLP 840 Malcolm Road, Suite 200 Burlingame, CA 94010	A.B. Data OBJECTIONS P.O. Box 173001 Milwaukee, WI 53217

If you don't timely and validly submit your objection, your view will not be considered by the Court or any court on appeal. You cannot object by telephone or email.

23. If I object to the Settlements, can I still get a payment?

Yes. Even if you object to the Settlements, you may still be able to get a payment if you are eligible.

24. What is the difference between objecting and asking to be excluded?

Objecting is simply telling the Court that you do not like something about the Settlements.

Excluding yourself is telling the Court that you do not want to be a part of the Settlements. If you exclude yourself, you cannot get a payment from the Settlements. If you exclude yourself, you will also have no basis to object to the Settlements because they no longer affect you.

The Fairness Hearing

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

25. When and where will the Court decide whether to approve the Settlements?

The Court will hold a hearing on **[Month 00, Year]** at **[0:00 x.m.]** at the United States District Court for the Middle District of Pennsylvania, **Herman T. Schneebeli Federal Bldg. & U.S. Courthouse, 240 West Third Street, Suite 218, Williamsport, PA 17701.**

Important! The time and date of the Fairness Hearing may change without additional mailed or published notice. For updated information on the hearing, visit: **[website]**.

At this hearing, the Court will consider whether the Settlements are fair, reasonable, and adequate. If there are objections, the Court will consider them and may listen to people who have objected and asked to speak at the hearing. The Court may also decide whether to award attorneys' fees and expenses and service awards for the Class Representatives. After the hearing, the Court will decide whether to approve the Settlements. We do not know how long these decisions will take.

26. Do I have to come to the hearing?

No. 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. As 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.

27. May I speak at the hearing?

Yes. If you send an objection regarding the Settlements as described in Question 22, you may ask to speak at the Fairness Hearing on your objection. You cannot speak at the hearing if you exclude yourself from the Settlement Class.

If You Do Nothing

28. What happens if I do nothing?

If you do nothing, and you fit the description of the Settlement Class, you are automatically a member of the Settlement Class. However, in some scenarios (such as when your compensation amount does not appear on the notice) if you do not file a timely and valid Claim Form, you will not receive any payment from the Settlements. You will be bound by past and future rulings, including rulings on the Settlements, Released Claims, and Releasees.

Getting More Information

29. How do I get more information?

This notice is only a summary. More details are in the Settlement Agreements, available at [website]. If you have questions, you also may contact the Settlement Administrator by writing to XXXXXXXXX, c/o A.B. Data, Ltd., P.O. Box 0000, Milwaukee, WI 53217, emailing info@XXXXXXXXXX.com, or calling the toll-free number 1-800-000-0000.

You may also be able to access the Settlement Agreements and other Court documents by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the Clerk's Office, United States District Court, Middle District of Pennsylvania, Herman T. Schneebeli Federal Bldg. & U.S. Courthouse, 240 West Third Street, Suite 218, Williamsport, PA 17701, during its normal operating hours.