

## **EXHIBIT 4**

**Declaration of Denise Earle  
(Angeion Group - Settlement Administrator)**

STARLA ROLLINS, et al.,  
Plaintiffs,  
v.  
DIGNITY HEALTH, et al.,  
Defendants.

## DECLARATION OF SETTLEMENT ADMINISTRATOR

I, Denise Earle, hereby declare the following pursuant to 28 U.S.C. §1746:

1. I am a Senior Project Manager with Angeion Group (“Angeion”), located at 1650 Arch Street, Suite 2210, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. The purpose of this declaration is to provide the Parties and the Court with a summary and the results of the work performed by Angeion to effectuate notice pursuant to the Court's October 19, 2021 Order Granting Motion for Preliminary Approval of Class Action Settlement (ECF No. 307) ("Order").

3. Angeion was retained by the Parties to serve as the Settlement Administrator to, among other tasks, disseminate Notice to Settlement Class and Vesting Subclass members and perform other duties as specified in the Second Restated and Amended Class Action Settlement Agreement (“Agreement”) and the Order that this Court preliminarily approved on October 19, 2021.

## DECLARATION OF SETTLEMENT ADMINISTRATOR

1           4.       On July 5, 2019, pursuant to 28 U.S.C. §§ 1715(b), Angeion caused Notice  
2 regarding the Settlement to be sent to the Attorneys General of all states and territories and the  
3 Attorney General of the United States (“CAFA Notice”). The CAFA Notice mailings included  
4 copies of the documents listed in the CAFA Notice. A true and correct copy of the CAFA Notice  
5 is attached hereto as Exhibit A.

6           5.       As a result of a previously entered Order denying Preliminary Approval of Class  
7 Action Settlement, on December 5, 2019, a supplemental CAFA Notice was mailed to the  
8 Attorneys General of all states and territories and the Attorney General of the United States to  
9 provide an update as to the terms of the Settlement (“Supplemental CAFA Notice”). A true and  
10 correct copy of the Supplemental CAFA Notice is attached hereto as Exhibit B.

11          6.       As a result of a previously entered Order denying Preliminary Approval of Class  
12 Action Settlement, on April 26, 2021, a second supplemental CAFA Notice was mailed to the  
13 Attorneys General of all states and territories and the Attorney General of the United States to  
14 provide an update as to the terms of the Settlement (“Second Supplemental CAFA Notice”). A  
15 true and correct copy of the Second Supplemental CAFA Notice is attached hereto as Exhibit C.

#### 16 17 **DIRECT NOTICE**

18          7.       Between November 16, 2021, and November 19, 2021, Angeion received from  
19 Liz Meckenstock, the Systems Director, Retirement Plans of CommonSpirit Health, the names,  
20 mailing address and email address information where available for members of the Settlement  
21 Class. Angeion identified approximately 117,969 records. After analyzing and deduplicating the  
22 data, Angeion determined 114,325 records had sufficient structured data for those records to be  
23 issued direct notice. Angeion identified 2,009 records providing names, but where no address  
24 information such that the Class members could be mailed direct notice. In summary, Angeion  
25 determined the following:

- 26           a.   58,872 records with mailing addresses only
- 27           b.   55,453 records with valid mailing and email addresses

1 c. 0 records with email address only

2 d. 2,009 records for which only names were provided

3 8. As a result of the above efforts, on December 2, 2021, Angeion commenced  
4 dissemination of the long form notice (hereinafter referred to as the “Notice”) by mail to 58,872  
5 records. Prior to mailing, the address information was processed through the USPS National  
6 Change of Address database, which provides updated address information for individuals or  
7 entities who have moved during the previous four (4) years and filed a change of address with the  
8 USPS. A true and correct copy of the Notice is attached hereto as Exhibit D.

9 9. As of December 16, 2021, Angeion received approximately 3,368 Notices  
10 returned by the USPS as undeliverable. For 275 of these, the USPS automatically forwarded them  
11 to an updated address. For 60 of these, the USPS provided an updated address to which Angeion  
12 will remail the Notice. For the remaining 3,033, Angeion will conduct address verification  
13 searches (commonly referred to as “skip traces”) in an attempt to locate updated address  
14 information. Notices will be remailed to any updated addresses identified.

15 10. In accordance with the Order, on December 2, 2021, Email Notice was sent to  
16 55,453 records for whom an email address was present. A true and correct copy of the Email  
17 Notice is attached hereto as Exhibit E.

18 11. Prior to disseminating the Email Notice, Angeion raised a potential issue with the  
19 Parties in that the Email Notice contained a large number of hyperlinks, some of which were  
20 repeated more than once. In Angeion’s experience, there is a risk with including too many  
21 hyperlinks in that an Email Notice may inadvertently be diverted to a Class member’s spam or  
22 junk folder. As such, Angeion recommended modifying the Email Notice to reduce the potential  
23 risk of the Email Notice being filtered to a Class member’s spam or junk folder. In response to  
24 Angeion’s recommendation on the Email Notice, counsel substantially reduced the number of  
25 hyperlinks and email addresses in the final form of the Email Notice by eliminating duplicates.  
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1           12.     Subsequent to sending Email Notice, Angeion identified 53 records for which the  
2 Email Notice was undeliverable. Angeion located mailing addresses for these records in the  
3 provided files, and on December 9, 2021, mailed the Notice to these records.  
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5 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
6 knowledge.  
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8 Executed on December 17, 2021

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11 DENISE EARLE  
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