

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

STARLA ROLLINS and PATRICIA  
WILSON, on behalf of themselves,  
individually, on behalf of all others similarly  
situated, and on behalf of the Dignity Plan,

Plaintiffs,

MICHELLE HALL, JENIFER HEINER, and  
CHRISTINE MONTOYA,

Intervenor Plaintiffs,

v.

DIGNITY HEALTH, a California Non-profit  
Corporation, HERBERT J. VALLIER, an  
individual, DARRYL ROBINSON, an  
individual, the Dignity Health Retirement  
Plans Subcommittee, and JOHN and JANE  
DOES, each an individual, 1-20,

Defendants.

Case No: 13-cv-01450-JST

**SECOND SUPPLEMENTAL  
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.

DECLARATION OF DENSE  
EARLE

2. Angeion has previously provided declarations regarding the provision of notice of preliminary approval of the Second Amended and Restated Class Action Settlement Agreement in the above-captioned matter (“Settlement”). ECF Nos. 310-4, 316-1.

3. The purpose of this Second Supplemental Declaration is to provide a summary and current status of the work performed by Angeion, as Settlement Administrator, to distribute settlement funds pursuant to the Settlement in accordance with the Court’s July 15, 2022, Order Granting Motion for Final Approval of Settlement and Motion for Attorneys’ Fees (“Approval Order”), ECF No. 320, and the Procedural Guidance for Class Action Settlements of the Northern District of California (the “Guidelines”).

4. The total number of class members to whom Angeion sent notice of the final approval hearing on the Settlement that were not returned as undeliverable, taking into consideration skip tracing and remails which resolved certain of the undeliverable mailings, is 113,263.

5. Beginning on August 15, 2022, Angeion mailed 3,282 checks, with a total value of \$950,000.25, to the members of the Vesting Subclass, consistent with the Settlement’s treatment of the claims of the Vesting Subclass. Settlement at ¶7.1.6. As of December 5, 2022, 2,188 of those checks had been cashed, for a total of \$677,587.85. As of December 5, 2022, 1,094 of those checks had not been cashed, for a total of \$272,412.40.

6. Beginning on August 15, 2022, Angeion mailed 1,050 checks, with a total value of \$824,993.55, to the members of the PEP Plus Subgroup, consistent with the Settlement’s treatment of the claims of the PEP Plus Subgroup. Settlement ¶ 7.1.7. As of December 5, 2022, 955 of those checks had been cashed, for a total of \$754,100.66. As of December 5, 2022, 95 of those checks had not been cashed, for a total of \$70,892.89.

7. A total of 364 settlement checks have been returned as undeliverable. As a result of skip tracing efforts, 327 of those checks have been reissued and remailed.

8. The Settlement also provides for certain deposits directly to the Dignity Health Pension Plan (“Plan”). Settlement ¶¶ 7.1.2, 7.1.3, ECF No. 310-1. Because no payments under

1 this portion of the Settlement are distributed to Class members, Angeion has no role in these  
2 deposits and does not address them in this Declaration.

3 9. Angeion has investigated and responded to several inquiries forwarded by Class  
4 Counsel or Dignity Health counsel with respect to replacement checks or updated addresses.  
5 Angeion has requested affidavits from claimants who requested replacement checks, and as of  
6 December 5, 2022, had mailed one replacement check.

7 10. Other than the foregoing, Angeion is unaware of any issues with administration of  
8 the Settlement.

9 11. The total administrative costs incurred by Angeion for the administration of the  
10 Settlement through November 30, 2022, are \$83,507.08.

11 I declare under penalty of perjury of the laws of the United States of America that the  
12 foregoing is true and correct.

13 Executed this 7th day of December, 2022.

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17 Denise Earle  
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DECLARATION OF DENSE  
EARLE