

EXHIBIT C

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4 **UNITED STATES DISTRICT COURT**
5 **NORTHERN DISTRICT OF CALIFORNIA**
6 **OAKLAND DIVISION**

7 STARLA ROLLINS and PATRICIA
8 WILSON, on behalf of themselves,
9 individually, on behalf of all others similarly
10 situated, and on behalf of the Dignity Plan,
11
12 Plaintiffs,

13 MICHELLE HALL, JENIFER HEINER, and
14 CHRISTINE MONTOYA,

15 Intervenor Plaintiffs,

16 v.

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

23 Defendants.

Case No: 13-cv-01450-JST

**DECLARATION OF ELIZABETH
MECKENSTOCK**

24 I, Elizabeth Meckenstock, declare under penalty of perjury under the laws of the United States:

25 1. I am over twenty-one (21) years of age and a resident of Virginia Beach, Virginia.

26 2. I am the System Director, Retirement Plans at CommonSpirit Health. My responsibilities
27 include the Dignity Health Pension Plan, which is the subject of this lawsuit. I have personal
28 knowledge of the matters set forth herein and if called to do so, I could and would testify
competently thereto.

3. Pursuant to the Second Amended and Restated Class Action Settlement Agreement (“Settlement”) approved by the Court’s July 15, 2022 Order Granting Motion for Final Approval of Settlement and Motion for Attorneys’ Fees (“Approval Order”), ECF No. 320, Dignity Health has made the cash contributions to the Plan Trust required to date pursuant to Section 7.1.2 and 7.1.3 of the Settlement Agreement, as follows:

Deposits to Plan Trust	<u>Required</u>	<u>Actual</u>
Calendar year 2020	\$ 50,000,000.00	\$ 53,600,000.00
Calendar year 2021	\$ 142,410,000.00	\$ 147,600,000.00
Calendar year 2022	\$ 105,900,000.00	\$ 153,875,000.00
Plan Trust deposits to date		\$ 355,075,000.00

4. Additional cash contributions to the Plan Trust will be made pursuant to the Settlement for the 2023 and 2024 calendar years.

5. Dignity Health, within 30 days of the Effective Date of the Settlement, caused to be issued checks in the aggregate amount of \$825,000 apportioned among the 1,050 members of the “PEP Plus Subgroup” in accordance with the Settlement (Settlement ¶ 7.1.7). Distribution has been effected with the assistance of the Settlement Administrator, Angeion.

6. Dignity Health, within 30 days of the Effective Date of the Settlement, caused to be issued checks in the aggregate amount of \$950,000 apportioned among the 3,282 members of the Vesting Subclass (Settled ¶ 7.1.6). Distribution has been effected with the assistance of the Settlement Administrator, Angeion.

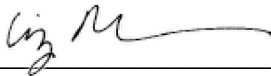
7. Payment of approved Case Contribution Awards and Class Counsel and Vesting Subclass Counsel’s fees and expenses, less a 10% fee holdback pursuant to the Approval Order, has been timely made. The balance of \$576,619.31 of Class Counsel’s fees, and \$5,000.00 of Vesting Subclass Counsel’s fees, are held by Dignity Health pending further order of this Court.

1 8. Dignity Health has reviewed and responded to questions by 49 claimants that were referred
 2 by Class Counsel. Approximately 41 individuals inquired whether they were entitled to a cash
 3 distribution as a PEP Plus claimant. Dignity Health reviewed these claims with information
 4 provided by the Plan's actuaries and confirmed that these claimants did not meet the definition of a
 5 PEP Plus claimant, either because they were not accruing benefits under the PEP Plus formula on
 6 January 1, 2014, or because they had not been negatively impacted under the PEP Plus formula as
 7 changed effective January 1, 2014. Questions referred by Class Counsel that dealt with updating
 8 addresses or lost checks were referred to Angeion.
 9

10 9. Dignity Health appointed two members of the Dignity Health Retirement Plans
 11 Subcommittee who are not employees of Dignity Health or its affiliates in 2019. One of those
 12 members has recently retired and a replacement is expected to be appointed by mid-January 2023.
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14 I declare under penalty of perjury of the laws of the United States of America that the foregoing
 15 is true and correct.

16 Executed this 9th day of December, 2022.

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19 Elizabeth (Liz) Meckenstock
 20 System Director, Retirement Plans
 4866-5097-5554, v. 2