

# **EXHIBIT D**

**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

**DECLARATION OF CHRISTOPHER  
GRAVER**

CHRISTOPHER GRAVER declares under penalty of perjury of the laws of the United  
States :

1. I am over twenty-one (21) years of age and a resident of Phoenix, Arizona.
2. I am an attorney licensed to practice in the State of Arizona and a partner in the law  
firm of Keller Rohrback L.L.P., Class Counsel in this action. I have personal knowledge of the  
matters set forth herein and if called to do so, I could and would testify competently thereto.

1           3.       Since the Effective Date of the Second Amended and Restated Class Action  
2 Settlement Agreement herein on August 15, 2022, Class Counsel have received approximately 125  
3 contacts from Class members. Sixty-eight (68) sought, and received, general information about  
4 the status of the Settlement. Eight (8) contacts were from claimants who were entitled to cash  
5 distributions as either Vesting Subclass members or PEP Plus claimants, and who requested  
6 replacement checks or provided updated addresses. In addition, 41 contacts were from claimants  
7 inquiring whether they were entitled to a cash distribution . To the extent the claimants desired  
8 more information about their individual claims than was available to Class Counsel, these inquiries  
9 were referred to Dignity Health.  
10

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

14           Executed this 9th day of December, 2022.

15  
16 

17 Christopher Graver

18 4862-6302-9570, v. 1  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28