

EXHIBIT E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Case No. 4:13-cv-01450-JST

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,

v.

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

Defendants

**DECLARATION OF OREN FAIRCLOTH
IN SUPPORT OF THE POST-DISTRIBUTION ACCOUNTING**

1 I, Oren Faircloth, pursuant to 28 U.S.C. § 1746, declare as follows:

2 1. I am an attorney at the law firm of Iazard, Kindall & Raabe (“IKR”) and am counsel
3 representing the Vesting Subclass in the above-captioned case (“Vesting Subclass Counsel”).

4 2. I have actual knowledge of the matters set forth in this Declaration.

5 3. Since the effective date of the Settlement, August 15, 2022, Vesting Subclass Counsel
6 has received and responded to roughly 21 inquiries concerning the Settlement. Most of the inquiries
7 sought additional information about the terms and timing of distribution of the Settlement, which
8 Vesting Subclass Counsel provided.

9 4. Several inquiries concerned the process for payment or cashing of checks, to which
10 Vesting Subclass Counsel responded. Several inquiries were from persons who were not members
11 of the Vesting Subclass. Those inquiries were referred to Class Counsel.

12 5. There are no outstanding inquiries received by Vesting Subclass Counsel to which a
13 response was not provided.

14 I certify that the foregoing is true and accurate to the best of my knowledge, information and
15 belief.

16
17 December 6, 2022
18 Date

/s/ Oren Faircloth
Oren Faircloth

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4871-4271-9811, v. 1