

ATTACHMENT 1

***CORRECTED* EXHIBIT A TO**

POST-DISTRIBUTION

ACCOUNTING

Rollins v. Dignity Health
Post-Distribution Accounting Information as of 12/5/2022

Settlement Distribution	Amount	
Settlement Fund ¹	\$ 356,850,000	
Uncashed checks	(\$ 343,305.29)	
Amount Distributed to Date	\$ 356,506,694.71	
Service of Class Notices²	Number of Class Members	Notices Not Returned as Undeliverable³
	116,334	113,263
Objections	Number of Objections	Objections as Percentage of Class Members
	3	0.003 %
Claim Forms⁴	Not Applicable	
Opt-Outs⁵	Not Applicable	

¹ For purposes of this accounting, we calculate the Settlement Fund as the sum of the amounts paid into the Plan Trust to date pursuant to the Second Amended and Restated Class Action Settlement Agreement (“Settlement”) at §§ 7.1.2, 7.1.3 (\$355,075,000); the PEP Plus Subgroup (\$825,000, *id.* § 7.1.7); and the Vesting Subclass (\$950,000, *id.* § 7.1.6). Additional amounts due to be deposited to the Plan Trust under § 7.1.3 of the Settlement are not capable of calculation at this time. Attorneys’ fees, expenses, and case contribution awards for Class Counsel and Vesting Subclass Counsel, totaling \$6,057,500, are not included in this calculation.

² Notice of final approval hearing; no other notices were required.

³ Takes into consideration skip tracing and remails which resolved certain of the undeliverable records.

⁴ The Settlement does not require submission of claim forms or any other action by any Class Member, PEP Plus Subgroup Member, or Vesting Subgroup Member.

⁵ This is a non-opt-out settlement pursuant to Fed. R. Civ. P. 23(b)(1).

Recoveries per Class Member	Average	Median	Maximum	Minimum
All Class Members ⁶	N/A	N/A	N/A	N/A
Vesting Subclass Members (3,282) ⁷	\$ 289.46	\$ 196.93	\$ 2,845.29	\$ 3.50
PEP Plus Subgroup Members (1,050)	\$ 785.71	\$ 975.32	\$ 975.32	\$ 548.60
Distribution Method	Number of Checks	Number of Direct Deposits	Other Method	Value
All Class Members ⁸	N/A	N/A	Direct Contribution to Plan Trust	\$355,075,000
PEP Plus Subgroup	1,050	N/A	N/A	\$824,993.55
Vesting Subclass	3,282	N/A	N/A	\$950,000.25

Status of Checks as of 12/5/22	Checks Cashed	Value	Checks Uncashed	Value
All Class Members ⁹	N/A	N/A	N/A	N/A
Vesting Claimants	2,188	\$677,587.85	1,094	\$272,412.20
PEP Plus Subgroup	955	\$754,100.66	95	\$70,892.89
Total Checks	3143	\$1,431,688.51	1,189	\$343,305.29
Returned Mail	364			
Remailed After Skip Tracing	327			
Cy Pres Recipients	Not Applicable			

⁶ The monetary benefit to the Class as a whole (Settlement at §§ 7.1.2, 7.1.3) is achieved through deposits into the Plan Trust that are not allocable to individual class members and cannot meaningfully be reduced to a specific dollar figure per Class member.

⁷ See Approval Motion at 11.

⁸ Most Class members did not receive a direct distribution under the Settlement. See note 6.

⁹ See Note 6.

Administrative Costs as of 11/30/2022	\$ 83,507.08				
Attorney's Fees and Expenses	Upon Final Approval	Subsequent to Final Approval	Fees and Expenses as % of Settlement	Updated Lodestar Total	Lodestar Multiplier
Class Counsel ¹⁰	\$ 6,000,000	No additional fees charged	2%	Unchanged	0.71
Vesting Subclass Counsel ¹¹	\$ 50,000	No additional fees charged	5%	Unchanged	0.63

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¹⁰ See Class Plaintiffs' Motion for Attorneys' Fees, Reimbursement Of Expenses, and Incentive Awards, ECF No. 311. Percentage calculated based on sum of amounts deposited to the Plan trust to date pursuant to Settlement §§ 7.1.2 and 7.1.3, plus PEP Plus subgroup settlement, totaling \$355,556,694.71.

¹¹ See Intervenor Plaintiffs' Motion for Award of Attorneys' Fees and Incentive Awards, ECF No. 312. Percentage calculated based on Vesting Subclass settlement of \$950,000.