

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WASHTENAW COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALGREEN CO., et al.,

Defendants.

Case No. 1:15-cv-3187

Honorable Sharon Johnson Coleman

Honorable Gabriel A. Fuentes

**DECLARATION OF ERIC SCHACHTER REGARDING (A) MAILING OF NOTICE OF
PENDENCY OF CLASS ACTION; (B) PUBLICATION OF SUMMARY NOTICE; AND
(C) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, Eric Schachter, declare as follows:

1. I am a Vice President of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. Pursuant to the Court's December 18, 2019 Minute Entry granting the parties' Joint Stipulated Motion to Approve Form and Manner of Class Notice ("Class Notice Motion") (ECF No. 303), A.B. Data was retained to act as the Administrator. I am over 21 years of age and am not a party to the above-captioned litigation (the "Action"). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

MAILING OF THE NOTICE

2. Pursuant to the proposed notice plan submitted with the Class Notice Motion, A.B. Data was responsible for mailing the Notice of Pendency of Class Action (the "Notice") to potential Class Members in this Action. By definition, Class Members are persons and entities who purchased or otherwise acquired Walgreen Co. ("Walgreens") common stock between

March 25, 2014 and August 5, 2014, inclusive, and were damaged thereby. A copy of the Notice is attached hereto as Exhibit A.

3. On January 6, 2020, A.B. Data received from Defendants' Counsel a data file from Walgreens' transfer agent containing 55,191 unique names and addresses of potential Class Members. On January 21, 2020, A.B. Data caused the Notice to be sent by first-class mail to those 55,191 potential Class Members.

4. As in most class actions of this nature, the large majority of potential Class Members are expected to be beneficial purchasers whose securities are held in "street name"—*i.e.*, the securities are purchased by brokerage firms, banks, institutions, and other third-party nominees (collectively, "Nominees") in the name of the respective Nominees, on behalf of the beneficial purchasers. A.B. Data maintains a proprietary database with the names and addresses of the largest and most common Nominees (the "Record Holder Mailing Database"). At the time of the initial mailing, the Record Holder Mailing Database contained 4,165 mailing records. On January 21, 2020, A.B. Data caused the Notice to be sent by first-class mail to the 4,165 mailing records contained in the Record Holder Mailing Database.

5. In total, 59,356 Notices were mailed to potential Class Members and their Nominees by first-class mail on January 21, 2020.

6. The Notice directed that those who purchased Walgreens common stock during the Class Period for the beneficial interest of a person or entity other than themselves must either (a) within seven (7) calendar days of receipt of the Notice, request from the Administrator sufficient copies of the Notice to forward to all such beneficial owners and, within seven (7) calendar days of receipt of those Notices, forward them to all such beneficial owners; or (b) within seven (7) calendar

days of receipt of the Notice, provide a list of the names and addresses of all such beneficial owners to the Administrator. *See* Notice ¶ 31.

7. As of July 14, 2020, A.B. Data has received an additional 91,411 names and addresses of potential Class Members from individuals or Nominees. A.B. Data has also received requests from Nominees for 86,155 Notices, in bulk, to be forwarded by the Nominees to their customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

8. As of July 14, 2020, A.B. Data has also received 23 labels containing the names and addresses of potential Class Members from Nominees for Notices to be forwarded to their customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

9. As of July 14, 2020, A.B. Data has mailed a total of 236,945 Notices to potential Class Members and Nominees. In addition, A.B. Data has re-mailed 3,327 Notices to persons and entities whose original mailings were returned by the U.S. Postal Service (“USPS”) and for whom updated addresses were provided to A.B. Data by the USPS or obtained through a third-party vendor.

PUBLICATION OF THE SUMMARY NOTICE

10. Pursuant to the proposed notice plan submitted with the Class Notice Motion, A.B. Data caused the Summary Notice of Pendency of Class Action (the “Summary Notice”) to be published in the national edition of *Investor’s Business Daily* and released via *PR Newswire* on January 27, 2020. Copies of proof of publication of the Summary Notice in *Investor’s Business Daily* and over *PR Newswire* are attached hereto as Exhibits B and C, respectively.

TELEPHONE HELP LINE

11. On or about January 21, 2020, A.B. Data established and continues to maintain a case-specific, toll-free telephone helpline, 1-866-963-9976, with an interactive voice response system and live operators, to accommodate potential Class Members with questions about the Action or the Notice they received. The automated attendant answers the calls and presents callers with a series of choices to respond to basic questions. Callers requiring further help have had the option to be transferred to a live operator during business hours. During non-business hours, callers may leave a message for an operator to call them back. The toll-free telephone helpline was set forth in the Notice, Summary Notice, and on the website for the Action addressed below.

WEBSITE

12. On or about January 21, 2020, A.B. Data established the website, www.WalgreensSecuritiesLitigation.com to provide additional information regarding the Action. The website also includes the deadline for requesting exclusion from the Class and provides downloadable copies of the Notice, the Memorandum Opinion and Order Granting Class Certification, the operative complaint, and other documents related to the Action. The website is accessible 24 hours a day, 7 days a week.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED

13. The Notice informed potential Class Members that requests for exclusion from the Class were to be sent to the Administrator, such that they were postmarked no later than April 20, 2020. Pursuant to General Orders issued in this District in response to the Coronavirus COVID-19 public emergency, the deadline for requesting exclusion from the Class was extended to July 6, 2020. This updated deadline is reflected on the case website. To date A.B. Data has received a total of 75 requests for exclusion from the Class.

14. Attached as Exhibit D hereto is a list of those who submitted requests for exclusion from the Class.

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

Executed this 15th day of July 2020.



Eric Schachter

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WASHTENAW COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALGREEN CO., et al.,

Defendants.

Case No. 1:15-cv-3187

Honorable Sharon Johnson Coleman

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**LIST OF EXHIBITS TO DECLARATION OF ERIC SCHACHTER REGARDING
(A) MAILING OF NOTICE OF PENDENCY OF CLASS ACTION;
(B) PUBLICATION OF SUMMARY NOTICE; AND
(C) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

Exhibit	Description
A.	Notice of Pendency of Class Action
B.	Proof of Publication of the Summary Notice in <i>Investor's Business Daily</i>
C.	Proof of Publication of the Summary Notice in <i>PR Newswire</i>
D.	List of Requests for Exclusion from the Class

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WASHTENAW COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALGREEN CO., et al.,

Defendants.

Civil Action No. 1:15-cv-3187-SJC-GAF

Honorable Sharon Johnson Coleman

NOTICE OF PENDENCY OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED WALGREEN CO. COMMON STOCK BETWEEN MARCH 25, 2014 AND AUGUST 5, 2014, INCLUSIVE, AND WERE DAMAGED THEREBY (THE "CLASS")

A federal court has authorized this notice. This is not a solicitation from a lawyer.

**PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.
YOU MAY BE A MEMBER OF THE CLASS DESCRIBED HEREIN. AS SUCH, YOUR
RIGHTS MAY BE AFFECTED BY A PENDING CLASS ACTION LAWSUIT.
THIS NOTICE ADVISES YOU OF YOUR OPTIONS REGARDING THE CLASS ACTION.**

**PLEASE DO NOT CALL OR WRITE THE COURT.
IF YOU HAVE ANY QUESTIONS AFTER READING THIS NOTICE,
YOU SHOULD CONTACT CLASS COUNSEL OR THE ADMINISTRATOR,
AS DISCUSSED FURTHER BELOW.**

This Notice is being sent pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of Illinois ("Court") to inform you: (a) of a class action lawsuit that is now pending in the Court under the above caption ("Action") against Walgreen Co. ("Walgreens"), former Walgreens Chief Executive Officer Gregory D. Wasson, and former Walgreens Chief Financial Officer Wade D. Miquelon (collectively, "Defendants"); and (b) that the Action has been certified by the Court to proceed as a class action on behalf of the Class, as defined in ¶ 1 below. **This Notice is not a settlement notice and you are not being asked to submit a claim.**

1. By Memorandum Opinion and Order dated March 29, 2018, the Court certified the following Class:

All persons and entities who purchased or otherwise acquired Walgreen Co. common stock between March 25, 2014 and August 5, 2014, inclusive (the "Class Period"), and were damaged thereby.

Excluded from the Class by definition are: (i) any Defendant in this Action; (ii) the officers and directors of Walgreens; (iii) members of the immediate families of the

Questions? Call toll-free 1-866-963-9976 or visit www.WalgreensSecuritiesLitigation.com

individual Defendants in this Action; (iv) any entity in which Defendants have or had a controlling interest; and (v) the legal representatives, heirs, successors, or assigns of any such excluded party.

2. This Notice is directed to you because you may be a member of the Class. If you are a member of the Class, your rights will be affected by this Action. If you do not fall within the Class definition, this Notice does not apply to you. If you are uncertain whether you are a member of the Class, contact Class Counsel listed in ¶ 24 below, or your own attorney.

3. This Notice is not an admission by Defendants or an expression of any opinion by the Court as to the merits of the Action, or a finding by the Court that the claims asserted by the Class Representative¹ in this Action are valid. This Notice is intended solely to inform you of the pendency of this Action and of your rights in connection with it, including the right to request exclusion from the Class. There is no judgment, settlement, or monetary recovery at this time. Defendants have denied Class Representative's claims. Defendants contend that they did not do anything wrong, and that they are not liable for any harm alleged by Class Representative on behalf of the Class.

4. The Class definition may be subject to change by the Court pursuant to Rule 23 of the Federal Rules of Civil Procedure.

DESCRIPTION AND STATUS OF THE LAWSUIT

5. This is a securities class action against Defendants for alleged violations of the federal securities laws during the Class Period. Class Representative alleges that Defendants made materially false and misleading statements regarding Walgreens' projected business performance and pharmacy business during the Class Period. More specifically, Class Representative alleges that Defendants made false and misleading statements regarding Walgreens' publicly announced EBIT (earnings before interest and taxes) goal for its fiscal year 2016 (the "FY16 EBIT Goal"), and regarding the impact of generic drug price inflation and reimbursement pressures on Walgreens' pharmacy business. Class Representative alleges that when the relevant truth was revealed, Walgreens' stock price declined causing damage to Walgreens' shareholders. Defendants deny all of the allegations of wrongdoing asserted in the Action and deny any liability whatsoever to any members of the Class.

6. In April 2015, the initial complaint was filed in this Court against Defendants, asserting violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78j(b) and 78t(a), and Rule 10b-5, promulgated thereunder, 17 C.F.R. § 240.10b-5.

7. By Order entered June 16, 2015, the Court appointed Industriens Pensionsforsikring A/S to serve as Lead Plaintiff in the Action, pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), and approved Lead Plaintiff's selection of Kessler Topaz Meltzer & Check LLP as Lead Counsel and Robbins Geller Rudman & Dowd LLP as Liaison Counsel.

8. On August 17, 2015, Lead Plaintiff filed the Consolidated Class Action Complaint for Violations of the Federal Securities Laws ("Consolidated Complaint"). Defendants moved to dismiss the Consolidated Complaint on October 16, 2015. Defendants' motions were fully briefed, and by Memorandum Opinion and Order dated September 30, 2016, the Court granted in part and denied in part

¹ Lead Plaintiff Industriens Pensionsforsikring A/S has been appointed by the Court as the Class Representative.

Defendants' motions to dismiss. Thereafter, on November 4, 2016, Defendants filed their answers to the Consolidated Complaint, denying all surviving allegations and asserting certain defenses. Defendants filed amended answers on January 16, 2017.

9. Thereafter, the parties began initial discovery efforts. Pursuant to Order dated February 22, 2017, the Court bifurcated class certification and merits discovery, effectively staying all merits discovery pending class certification proceedings.

10. On April 21, 2017, Lead Plaintiff filed its motion for class certification, which Defendants opposed on July 3, 2017. Lead Plaintiff filed a reply in further support of its motion on September 15, 2017. By Memorandum Opinion and Order dated March 29, 2018, the Court granted Lead Plaintiff's motion, certifying the Class, appointing Lead Plaintiff Industriens Pensionsforsikring A/S as Class Representative, and appointing Kessler Topaz Meltzer & Check LLP as Class Counsel. The Court's Order certifying the Class does not guarantee Class members will receive money or benefits; that will be decided later in the lawsuit.

11. Thereafter, the parties engaged in initial merits discovery.

12. On September 28, 2018, the U.S. Securities and Exchange Commission ("SEC") instituted proceedings and entered an order reflecting a no-admit-no-deny settlement with Defendants (the "SEC Settlement"), which arose from certain public statements made by Defendants that are the subject of the Consolidated Complaint.

13. In accordance with a Court-ordered deadline, on December 21, 2018, and based on facts alleged in the SEC Settlement and gleaned through discovery, Class Representative filed the First Amended Consolidated Complaint for Violations of the Federal Securities Laws ("Amended Consolidated Complaint"), which included both new allegations of false and misleading statements during the Class Period as well as amended allegations regarding certain statements regarding Walgreens' FY16 EBIT Goal that had been previously dismissed.

14. Defendants moved to dismiss the Amended Consolidated Complaint on February 19, 2019. On September 23, 2019, the Court granted in part and denied in part Defendants' motion to dismiss, sustaining claims based on certain new alleged misstatements and certain previously dismissed statements related to the FY16 EBIT Goal.

15. No court has made a ruling on the merits of Class Representative's claims or Defendants' denials and defenses. Please note that this Notice does not describe all claims and defenses asserted by the parties. The section entitled "Where You Can Find Additional Information" describes the process by which you can obtain additional information about the Action and the claims and defenses asserted.

16. The parties are currently engaged in additional merits discovery efforts consistent with the Court's September 23, 2019 Order. Pursuant to the Court-ordered pretrial schedule, all fact discovery is to be completed by June 19, 2020.

YOUR RIGHTS AS A CLASS MEMBER

17. A class action is a type of lawsuit in which one or several individuals or entities prosecute claims on behalf of all members of a group of similarly situated persons and entities to obtain monetary or other relief for the benefit of the entire group. Class actions avoid the necessity of each member of a

Questions? Call toll-free 1-866-963-9976 or visit www.WalgreensSecuritiesLitigation.com

class having to file his, her, or its own separate lawsuit to obtain relief. Class actions are used to decide legal and factual issues that are common to all members of a class.

18. If you purchased or otherwise acquired Walgreens common stock between March 25, 2014 and August 5, 2014, inclusive, and were damaged thereby, and you are not excluded by definition from the Class, you are a member of the Class. If you are a member of the Class, you have the right to decide whether to remain a member of the Class. If you are a member of the Class and wish to be excluded from the Class, you must request exclusion in accordance with the procedures set forth in ¶ 20 below. ***If you want to remain a member of the Class, you do not need to do anything at this time other than to retain your documentation reflecting your transactions in Walgreens common stock during the Class Period as discussed below in ¶ 19.*** Your decision is important for the following reasons:

- a. **If you choose to remain a member of the Class**, you will be bound by all past, present, and future orders and judgments in the Action, whether favorable or unfavorable. If any money is awarded to the Class, either through a settlement with Defendants or a judgment of the Court after a trial, you may be eligible to receive a share of that award. However, if you remain a member of the Class, you may not pursue a lawsuit on your own behalf with regard to any of the issues in this Action. Pursuant to Rule 23(e)(4) of the Federal Rules of Civil Procedure, it is within the Court's discretion whether to allow a second opportunity to request exclusion from the Class if there is a settlement or judgment in the Action after a trial; accordingly, this may be the only opportunity to request exclusion from the Class. Please note that if you remain a member of the Class, you will not be personally responsible for Class Counsel's attorneys' fees or costs. Class Counsel has agreed to represent the Class on a contingent fee basis, which means that it will be awarded attorneys' fees and costs by the Court only if it succeeds in obtaining a recovery from one or more Defendants. Any attorneys' fees for Class Counsel will be awarded by the Court from the settlement or judgment, if any, obtained on behalf of the Class. As a member of the Class you will be represented by Class Counsel. Alternatively, you may remain a member of the Class and elect to be represented by counsel of your own choosing. If you do retain separate counsel, you will be responsible for that attorney's fees and costs and that attorney must enter an appearance on your behalf by filing a Notice of Appearance with the Court and mailing it to Class Counsel at one of the addresses set forth in ¶ 24 below **on or before April 20, 2020**.
- b. **If you choose to be excluded from the Class**, you will not be bound by any orders or judgments in this Action, nor will you be eligible to share in any recovery that might be obtained in this Action. If you exclude yourself from the Class, you will retain any right you have to individually pursue any legal rights that you may have against any Defendants with respect to the claims asserted in this Action. ***Please note however, that you may be time-barred from asserting the claims covered by the Action by a statute of repose. Class Counsel offers no advice and no opinion on whether you will be able to maintain such claims.*** Please refer to ¶¶ 20-23 below if you would like to request exclusion from the Class.

19. Members of the Class will be eligible to participate in any recovery that might be obtained in the Action. While this Notice is not intended to suggest any likelihood that Class Representative or members of the Class will obtain any recovery, should there be a recovery, members of the Class will be required to support their requests to participate in the distribution of the recovery by demonstrating their membership in the Class and documenting their purchases, acquisitions, and sales of

Walgreens common stock, and their resulting damages. *For this reason, please be sure to keep all records of your transactions in this security. DO NOT mail them to Class Counsel or the Administrator at this time.*

HOW TO BE EXCLUDED FROM THE CLASS

20. To exclude yourself from the Class, you must send a letter by first-class mail stating that you “request exclusion from the Class in *Washtenaw County Employees’ Retirement System v. Walgreen Co., et al.*, Civil Action No. 1:15-cv-3187-SJC-GAF.” Your request must state your full name, address, and telephone number, and be signed. If you are signing on behalf of a Class member (such as an estate, corporation, or partnership), please indicate your full name and the basis of your authority to act on behalf of the Class member. Your request for exclusion must also state the amount of Walgreens common stock purchased, acquired, and/or sold during the Class Period, as well as the dates and prices of each such purchase, acquisition, and/or sale. You must mail your exclusion request, *postmarked no later than April 20, 2020*, to:

**Walgreens Securities Litigation
ATTN: EXCLUSIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217**

21. You cannot exclude yourself from the Class by telephone, facsimile, or email. Requests for exclusion that do not comply with the above requirements will be invalid, unless otherwise accepted by the Court, subject to any objections of the parties to be resolved by the Court.

22. Do not request exclusion if you wish to participate in this Action as a member of the Class.

23. If you properly request exclusion from the Class, you will not be bound by any orders or judgments in this Action, but you also will not be eligible to share in any recovery that might be obtained in this Action. If you properly request exclusion from the Class, you will be entitled to pursue any individual lawsuit, claim, or remedy, if available, which you may have, at your own expense. Please note, if you decide to exclude yourself from the Class, you may be time-barred from asserting the claims covered by the Action by a statute of repose. *Class Counsel offers no advice and no opinion on whether you will be able to maintain such claims.*

CLASS COUNSEL

24. The Court appointed the law firm of Kessler Topaz Meltzer & Check LLP as Class Counsel. If you have any questions concerning the matters raised in this Notice, you may contact Class Counsel, as follows:

**KESSLER TOPAZ MELTZER
& CHECK LLP**

Eli R. Greenstein, Esq.
One Sansome Street, Suite 1850
San Francisco, CA 94104
Telephone: (415) 400-3000

Questions? Call toll-free 1-866-963-9976 or visit www.WalgreensSecuritiesLitigation.com

Facsimile: (415) 400-3001

- and -

Johnston de F. Whitman, Esq.
Michelle M. Newcomer, Esq.
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

info@ktmc.com
www.ktmc.com

25. As noted above, unless you elect to retain your own personal lawyer, if you remain in the Class you will not have any direct obligations to pay the costs of the litigation. If there is a recovery by the Class in this Action, all costs and expenses of the Action, including Class Counsel's attorneys' fees, will be paid from that recovery in an amount approved by the Court.

26. If you want to be represented by your own lawyer, you may hire one at your own expense. If you do retain your own lawyer, such counsel must enter an appearance on your behalf by filing a Notice of Appearance with the Clerk of the Court at the United States District Court for the Northern District of Illinois, Eastern Division, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, **on or before April 20, 2020**. Your Notice of Appearance must also be mailed to Class Counsel at one of the addresses set forth in ¶ 24 above, **on or before April 20, 2020**.

PLEASE KEEP YOUR ADDRESS CURRENT

27. To assist the Court and the parties in maintaining accurate lists of Class members, you are requested to mail notice of any changes in your address to:

**Walgreens Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173092
Milwaukee, WI 53217**

28. If this Notice was forwarded to you by the postal service, or if it was otherwise sent to you at an address that is not current, you should immediately contact the Administrator, A.B. Data, Ltd., at the address above or toll-free at (866) 963-9976 and provide them with your correct address. If the Administrator does not have your correct address, you may not receive notice of important developments in this Action.

WHERE YOU CAN FIND ADDITIONAL INFORMATION

29. This Notice provides only a summary of the lawsuit and the claims asserted by Class Representative. For more detailed information regarding the Action, you may contact Class Counsel or visit www.WalgreensSecuritiesLitigation.com.

Questions? Call toll-free 1-866-963-9976 or visit www.WalgreensSecuritiesLitigation.com

30. Complete copies of the pleadings, orders, and other documents filed in this Action are available at <http://www.pacer.gov> or at the office of the Clerk of the Court, United States District Court for the Northern District of Illinois, Eastern Division, Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, under Civil Action No. 1:15-cv-3187-SJC-GAF.

PLEASE DO NOT CALL OR WRITE THE COURT OR CLERK OF THE COURT REGARDING THIS NOTICE.

NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

31. If, for the beneficial interest of any person or entity other than yourself, you purchased or otherwise acquired Walgreens common stock between March 25, 2014 and August 5, 2014, inclusive, you **MUST EITHER**: (a) **WITHIN SEVEN (7) CALENDAR DAYS** of receipt of this Notice, request from the Administrator sufficient copies of the Notice to forward to all such beneficial owners and **WITHIN SEVEN (7) CALENDAR DAYS** of receipt of those Notices forward them to all such beneficial owners; or (b) **WITHIN SEVEN (7) CALENDAR DAYS** of receipt of this Notice, provide a list of the names and addresses of all such beneficial owners to the Administrator at *Walgreens Securities Litigation*, c/o A.B. Data, Ltd., P.O. Box 173092 Milwaukee, WI 53217. If you choose the first option, **YOU MUST** send a statement to the Administrator confirming that the mailing was made and **YOU MUST** retain your mailing records for use in connection with any further notices that may be provided in the Action. If you choose the second option, the Administrator will send a copy of the Notice to the beneficial owners. Upon **FULL AND TIMELY** compliance with these directions, such nominees may seek reimbursement of their reasonable expenses actually incurred by providing the Administrator with proper documentation supporting the expenses for which reimbursement is sought.

DATED: January 21, 2020

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Walgreens Securities Litigation Administrator
c/o A.B. Data, Ltd.
P.O. Box 173092
Milwaukee, WI 53217

COURT-APPROVED NOTICE REGARDING
Washtenaw County Employees' Retirement System v. Walgreen Co., et al.
Civil Action No. 1:15-cv-3187-SJC-GAF

DATED MATERIAL – OPEN IMMEDIATELY

EXHIBIT B

EXHIBIT C

Kessler Topaz Meltzer & Check LLP Announces Pendency of Class Action on Behalf of Purchasers of Walgreen Co. Common Stock

NEWS PROVIDED BY

Kessler Topaz Meltzer & Check LLP →

Jan 27, 2020, 13:00 ET

SAN FRANCISCO, Jan. 27, 2020 /PRNewswire/ --

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WASHTENAW COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALGREEN CO., et al.,

Defendants.

Civil Action No. 1:15-cv-3187-SJC-GAF

Honorable Sharon Johnson Coleman

SUMMARY NOTICE OF PENDENCY OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED WALGREEN CO. COMMON STOCK BETWEEN MARCH 25, 2014 AND AUGUST 5, 2014, INCLUSIVE, AND WERE DAMAGED THEREBY (THE "CLASS")

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of Illinois, that the above-captioned action ("Action") against Walgreen Co. ("Walgreens"), former Walgreens Chief Executive Officer Gregory D. Wasson, and former Walgreens Chief Financial Officer Wade D. Miquelon (collectively, "Defendants"), has been certified as a class action on behalf of the Class, except for certain persons and entities that are excluded from the Class by definition as set forth in the full printed Notice of Pendency of Class Action ("Notice"). Lead Plaintiff Industriens Pensionsforsikring A/S has been appointed by the Court to represent the Class.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THIS LAWSUIT. The full printed Notice is currently being mailed to known Class members. If you have not yet received a full printed Notice, you may obtain a copy from the website for the Action, www.WalgreensSecuritiesLitigation.com, or by contacting the Administrator:

Walgreens Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173092
Milwaukee, WI 53217
(866) 963-9976

If you did not receive the Notice by mail and you are a member of the Class, please send your name and address to the Administrator so if any future notices are disseminated in connection with the Action, you will receive them.

Inquiries, other than requests for the Notice, may be made to Court-appointed Class Counsel:

Eli R. Greenstein, Esq.
KESSLER TOPAZ MELTZER
& CHECK LLP
One Sansome Street, Suite 1850
San Francisco, CA 94104
Telephone: (415) 400-3000
Facsimile: (415) 400-3001
- and -
Johnston de F. Whitman, Esq.

Michelle M. Newcomer, Esq.

280 King of Prussia Road

Radnor, PA 19087

Telephone: (610) 667-7706

Facsimile: (610) 667-7056

info@ktmc.com

www.ktmc.com

If you are a Class member, you have the right to decide whether to remain a member of the Class. ***If you choose to remain a member of the Class, you do not need to do anything at this time other than retain your documentation reflecting your transactions in Walgreens common stock.*** You will automatically be included in the Class, and you will be bound by the proceedings in this Action, including all past, present, and future orders and judgments of the Court, whether favorable or unfavorable. If you are a Class member and **do not** wish to remain a member of the Class, you **must** take steps to exclude yourself from the Class.

If you timely and validly request to be excluded from the Class, you will not be bound by any orders or judgments in the Action, and you will not be eligible to receive a share of any money which might be recovered in the future for the benefit of the Class. ***If you exclude yourself from the Class, please note however that you may be time-barred from asserting the claims covered by the Action by a statute of repose.*** Class Counsel offers no advice and no opinion on whether you will be able to maintain such claims. To exclude yourself from the Class, you must submit a written request for exclusion **postmarked no later than April 20, 2020**, in accordance with the instructions set forth in the full printed Notice. Pursuant to Rule 23(e)(4) of the Federal Rules of Civil Procedure, it is within the Court's discretion as to whether a second opportunity to request exclusion from the Class will be allowed if there is a settlement or judgment in the Action; accordingly, this may be the only opportunity to request exclusion from the Class.

Further information may be obtained by contacting the Administrator as set forth above or by visiting the website www.WalgreensSecuritiesLitigation.com.

Please Do Not Call or Write the Court with Questions.

DATED: January 27, 2020

BY ORDER OF THE COURT

SOURCE Kessler Topaz Meltzer & Check LLP

Related Links

<http://www.ktmc.com>

EXHIBIT D

**Walgreens Securities Litigation
Exclusion Report**

Name	City, State, Zip
1. Donald E. Struck Joan C. Struck	Springfield, IL 62711-6030
2. Mary P. Carr	Lincolnwood, IL 60712
3. Melvin W. Harvey Karen L. Harvey	Nenana, AK 99760
4. Robert R. Bakanowicz	Kimberling City, MO 65686
5. Charles H. Williamson Joyce H. Williamson	Woodstock, GA 30188
6. John Eric Nelson	Oswego, IL 60543
7. Virginia Ann Benson	Springfield, TN 37172
8. Donna Rehman Donald Rehman Melanie Rehman	Winfield, IL 60190
9. Larry K. Gray	Tucson, AZ 85742
10. Jean Hack	Valparaiso, IN 46383
11. Emilio A. Vazquez Emilio A. Vazquez, Jr. JT Tenants	Miami, FL 33222-8177
12. David C. Morehouse Alice M. Morehouse Trustees of the Morehouse Trust dated April 3, 2001	Madison, WI 53719
13. Sonya C. Gans	Monticello, IL 61856
14. Donald F. Anderson, Trustee Anderson Family TR UA 10/13/95	Las Vegas, NV 89134
15. Nellie Irene Healy	Millington, TN 38053
16. James L. Dority	Santa Ana, CA 92705-7512
17. Thomas P. Kendellen	Greenfield, WI 53201
18. Marilyn Novello	Chicago, IL 60630
19. Christopher James Giles	Cumbria LA22 9AU UK
20. Christine Styles	Napier 4110 New Zealand
21. Karlene M. Guerette	East Hampton, CT 06424
22. William P. Gammie	Buckley, WA 98321
23. James P. Haen	Schofield, WI 54476

24. Sandra S. Boyd	Shadyside, OH 43947
25. Kent R. Wagner	Cincinnati, OH 45231
26. Cherri Watkins	Chillicothe, IL 61523
27. Emily VanDerPuy	Grand Haven, MI 49417
28. Jerry William Galligar	Oswego, IL 60543
29. Harold L. Hinkley	Mount Dora, FL 32757-9112
30. Wade Stynoski	Morton Grove, IL 60053-2074
31. Aloysius J. Kempf Kathleen M. Kempf	Anoka, MN 55303-6120
32. John Adam Colquitt	Longview, TX 75604-3600
33. Bryan L. Wagoner Brandon M. Wagoner	Gillespie, IL 62033
34. Bryan L. Wagoner Zachary R. Wagoner	Gillespie, IL 62033
35. Georgia B. Petrie	Scotts Valley, CA 95066-4615
36. Karl M. Grisso Dorothy L. Grisso	Charleston, IL 61920-4230
37. Joseph Calabrese III	Belleville, NJ 07109
38. Joseph Calabrese Jr.	Belleville, NJ 07109
39. Barbara E. Linn	Great Falls, MT 59405
40. Marilyn A. Spores	West Des Moines, IA 50266
41. Leonard V. Wojtowicz Carol Wojtowicz, JT	Naperville, IL 60563
42. William Chalmers Gertrude Louise Chalmers	Meridian, ID 83646-3459
43. Alice Davidson	Huntley, IL 60142
44. James R. Walker	Waco, TX 76705
45. The Bakers's Dozen Investment Club Carol J. Raap, President	Andover, SD 57422
46. Terry Pickel	Labadie, MO 63055
47. Jungsoo Park	Colorado Springs, CO 80906
48. Sally Harrington Holmes	Lawton, OK 73505-9668
49. Audrey Christiansen	Manitowoc, WI 54220

50. Karen G. Giambalvo	Mount Prospect, IL 60056
51. Gloria J. Yurko Donald E. Yurko	Streator, IL 61364
52. Thomas A. Carlson	Missoula, MT 59802
53. Estate of Charles A. Bean	Cozad, NE 69130-4108
54. Terry Polansky	Forsyth, MO 65653
55. James Robley Vidrine	Ville Platte, LA 70586
56. Judy Truckenbrod	West Brooklyn, IL 61378-9526
57. James J. Parisi	Park Ridge, IL 60068
58. Charles R. Maier, TTEE Charles R. Maier Living Trust	Wayne, NE 68787
59. Betty H. Johnson	Thomson, MA 30824
60. Robert F. Parker, Jr.	Sulphur Springs, TX 75482
61. Vernon C. Ellis Jr. TTEE U/A DTD 01/29/02 The Vernon C. Ellis Jr. Trust	Torrington, WY 82240
62. Gerald F. Allenberg Judith L. Allenberg Gerald & Judith Allenberg TR	St. Charles, MO 63301-4494
63. Donald J. Blake	Johnsburg, IL 60051
64. Paula Charlene Cherry Honeycutt	Pineville, AR 72566
65. Joseph P. Clavet	Ridgecrest, CA 93555
66. Cheryl Ann Mouton	Oakland, CA 94605
67. Diana L. Smith	Springfield, IL 62702-4608
68. Ronald G. Kimbrough Mary Ann Kimbrough	St. Louis, MO 63128-2739
69. Nicholas Matthew Kennedy	Albuquerque, NM 87109
70. Nicholas Lemon Kennedy III Jean Ann Kennedy	Albuquerque, NM 87109
71. Frank J. Sitterle c/o Barry A. McClenahan	San Antonio, TX 78230
72. Carol Kannegieter	Watertown, SD 57201
73. Mary Stynoski	Morton Grove, IL 60053-2074
74. Eugenia W. Raper	Ashdown, AR 71822
75. Charles Ross Werner Joan L. Werner	Palm Desert, CA 92211