

**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

Honorable Sharon Johnson Coleman

**SUPPLEMENTAL DECLARATION OF ERIC SCHACHTER REGARDING:
(A) UPDATE ON MAILING OF POSTCARD NOTICE AND NOTICE PACKET; AND
(B) UPDATE ON TOLL-FREE TELEPHONE HELPLINE AND CASE WEBSITE**

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 Order Preliminarily Approving Settlement and Providing for Notice dated June 29, 2022 (Doc. 510), Class Counsel was authorized to retain A.B. Data as the Claims Administrator in connection with the Settlement of the above-captioned action ("Action"). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I submit this declaration as a supplement to my previously-filed declaration, the Declaration of Eric Schachter Regarding: (A) Mailing of Postcard Notice and Notice Packets; (B) Publication of Summary Settlement Notice; and (C) Updates to Case Website and Toll-Free Telephone Helpline dated September 1, 2022 (Doc. 515-2) ("Initial Mailing Declaration").¹

¹ Unless otherwise defined in this declaration, all capitalized terms have the meanings defined in the Stipulation and Agreement of Settlement dated June 23, 2022 (Doc. 505) and/or in the Initial Mailing Declaration.

UPDATE ON MAILING OF POSTCARD NOTICE AND NOTICE PACKET


3. As set forth in the Initial Mailing Declaration, A.B. Data had mailed 278,052 Postcard Notices and 4,749 Notice Packets to potential Class Members and nominees as of September 1, 2022. Since the execution of the Initial Mailing Declaration, A.B. Data has continued to receive requests from potential Class Members and Nominees for copies of the Notice Packet. As a result, an additional 341 Notice Packets have been mailed such that as of September 29, 2022, A.B. Data has mailed a total of 278,052 Postcard Notices and 4,990 Notice Packets to potential Class Members and Nominees.

UPDATE ON TOLL-FREE TELEPHONE HELPLINE AND CASE WEBSITE

4. A.B. Data continues to maintain a toll-free telephone number, 1-866-963-9976, and dedicated website, www.WalgreensSecuritiesLitigation.com, for the Action. On September 6, 2022, A.B. Data posted to the website copies of the papers filed in support of Class Representative's motion for final approval of the Settlement and Plan of Allocation and Class Counsel's motion for an award of attorneys' fees and Litigation Expenses (Docs. 515-518). A.B. Data will continue maintaining and, as appropriate, updating the case website and toll-free telephone helpline until the conclusion of the administration.

5. Class Members seeking to object to the Settlement, the Plan of Allocation, and/or Class Counsel's request for attorneys' fees and Litigation Expenses were required to file their objection with the Court, with copies to Class Counsel and Defendants' Counsel, by no later than September 16, 2022. As of the date of this declaration, A.B. Data has not received any objections.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 30th day of September 2022.



Eric Schachter