

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

KPH HEALTHCARE SERVICES, INC.,
a/k/a KINNEY DRUGS INC., FWK
HOLDINGS LLC, and CÉSAR CASTILLO,
LLC, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

MYLAN N.V., MYLAN SPECIALTY L.P.,
and MYLAN PHARMACEUTICALS, INC.,

Defendants.

Case No. 2:20-cv-02065-DDC-TJJ

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL DECLARATIONS RELATING TO
CLAIMS ADMINISTRATION EXPENSES**

KPH Healthcare Services, Inc., FWK Holdings, LLC, and César Castillo, LLC (“Plaintiffs”), submit the following; (1) Declaration of A.B. Data, Ltd.; and (2) Declaration of Russell L. Lamb. These declarations are submitted in connection with Plaintiff’s Motion for Final Approval (ECF No. 465) and reflect updates regarding the notice and administration of the Mylan Settlement, including additional expenses incurred or expected to be incurred.

Respectfully Submitted,

Dated: April 25, 2025

/s/ Bradley T. Wilders

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Bradley T. Wilders

Jordan A. Kane

STUEVE SIEGEL HANSON LLP

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Kansas City, Missouri 64112

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Class*

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*Co-Lead Counsel for the Direct Purchaser
Settlement Class*

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KPH HEALTHCARE SERVICES, INC. A/K/A
KINNEY DRUGS, INC., FWK HOLDINGS
LLC, and CÉSAR CASTILLO, LLC,

Plaintiff,

v.

MYLAN N.V., *et al.*,
Defendants.

Case No. 20-cv-2065-DDC-TJJ

**DECLARATION OF TRACY M. HANSON REGARDING
(A) REPORT ON SETTLEMENT CLASS RESPONSE TO DATE AND
(B) A.B. DATA'S INVOICES TO DATE**

I, Tracy M. Hanson, hereby declare and state as follows:

1. I am a Project Manager with A.B. Data, Ltd. (“A.B. Data”). I am familiar with the facts contained herein based upon my personal knowledge and, if called as a witness, could and would testify competently thereto. I submit this Declaration at the request of Co-Lead Settlement Class Counsel to advise the Court of A.B. Data’s activities and provide an update regarding the distribution of notice and the results.

2. A.B. Data was appointed by the Court in its Order dated February 6, 2025 (ECF No. 458 ¶ 10), as amended by the Court’s February 24, 2025 Order (ECF No. 461), to serve as Settlement Administrator for the direct purchaser class settlement with the Mylan Defendants (the “Settlement”) in this case. A.B. Data’s duties in this case include administering the distribution of notice of the Settlement to Settlement Class Members. I previously submitted a Declaration regarding this Settlement on March 21, 2025 (ECF No. 466-5), and my colleague Eric J. Miller submitted a Declaration on January 15, 2025 (ECF No. 454-8).

Claims

3. The deadline for Settlement Class Members to postmark or submit a claim online is May 29, 2025. Settlement Class Members who previously submitted a timely valid claim in the Pfizer Settlement are considered to have submitted a claim in this Settlement, and if they wish, may provide additional data to account for the longer time period for claims in the Mylan Settlement. A.B. Data continues to review and process claims; however, certain audits cannot be completed until the deadline has passed and all claims have been submitted.

4. To date, A.B. Data has received a total of 52 claims in this Settlement, including the 50 valid timely claims received in the Pfizer Settlement. Since the date of my previous declaration, 2 additional claimants provided additional information to validate their claims filed in the Pfizer Settlement.

Requests for Exclusion and Objections

5. The Notice instructed any Settlement Class Member requesting exclusion from the Settlement Class to postmark (if mailed) or submit (if submitted online) such a request on or before April 11, 2025. As of the date of this Declaration, A.B. Data has not received any requests for exclusion.

6. The postmark deadline for a Settlement Class Member to object to the Settlement, the Plan of Allocation, and/or the Fee Petition was also April 11, 2025. The Notice directed members of the Settlement Class to file their objection with the Clerk of the United States District Court for the District of Kansas with copies to Co-Lead Settlement Class Counsel and Settling Defendants' Counsel. As of the date of this Declaration, A.B. Data has not received or been notified of any objections.

Settlement Administration Billing

7. A.B. Data agreed to be the Settlement Administrator in exchange for payment of its fees and out-of-pocket expenses. As of the date of this Declaration, A.B. Data has incurred total fees and expenses in connection with this Settlement in the amount of \$53,092.77. A copy of the invoice to date are attached as **Exhibit A**. A.B. Data estimates that it will incur additional fees and expenses in the amount of \$11,283.90 through the final distribution of this Settlement.

Updates Regarding Notice

8. A.B. Data tracked the Notice mailing. Of the 228 Notices mailed to 84 potential Settlement Class Members, 34 Notices have been returned as undeliverable as of the date of this Declaration. If the Notice to a potential Settlement Class Member is returned as undeliverable as addressed by the United States Postal Service, A.B. Data will perform additional research to locate an updated address, and where an updated address is located, A.B. Data will promptly remail the Notice to the updated address. Of the 34 returned Notices, 22 of the returned Notices were for Class Members who were sent Notices via alternate mailing addresses where a Notice was mailed and not returned. Six were to the addresses of one Class Member who has gone out of business. The remaining six entities were researched through a third-party skip trace service that identified updated addresses for two; those two were remailed to the updated address.

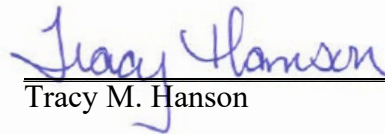
9. As of April 25, 2025, A.B. Data has received three (3) claims in the Mylan settlement with supplemental data. A reminder notice was emailed to fifty (50) Settlement Class Members on April 25, 2025, who filed in the Pfizer Settlement but have not filed a supplemental claim in the Mylan Settlement. The email reminded them that there is still time to submit supplemental data covering any purchases made during the extended settlement period of April 3,

2024, through February 6, 2025, but they do not have to submit supplemental data to receive a payment in the Mylan Settlement.

10. A.B. Data continues to maintain a case-specific toll-free telephone number (866-778-6568), email address (info@EpiPenDPPSettlement.com), and website (www.EpiPenDPPSettlement.com), which were included in the mailed and published notices. To date, the website has received 4,572 visitors, the email address has received 120 messages, and the toll-free telephone number has received sixty (60) calls.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 25, 2025.



Tracy M. Hanson

EXHIBIT A

A.B. DATA, LTD.**Class Action Administration**

600 A. B. Data Drive
 Milwaukee, WI 53217
 414-961-7523
 billing@abdata.com
 abdataclassaction.com



NUSSBAUM LAW GROUP, PC
 1133 AVENUE OF THE AMERICAS
 31ST FLOOR
 NEW YORK, NY, 10036

INVOICE #: 54769
INVOICE DATE: 3/14/2025
PERIOD ENDING: 2/28/2025
CLIENT: 681650
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE PREVIEW

JOB 54769 EpiPen Direct Purchaser - Mylan

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Preparation of Paper Claim Forms	1	5.00	\$5.00
Executive Project Management (Hourly) - Mylan	2.93	240.00	\$703.20
Project Management (Hourly) - Mylan	20.60	185.00	\$3,811.00
System Support (Hourly) - Mylan	23.08	195.00	\$4,500.60
Staff (Hourly) - Mylan	11.88	110.00	\$1,306.80
Staff - Other (Hourly) - Mylan	13.32	55.00	\$732.60
Printing and Mailing of Notices - 16 Page (Mylan) Flat Fee	1	1,500.0000	\$1,500.00
Postage	1	222.13	\$222.13
Media Notices	1	40,000.00	\$40,000.00
Website Maintenance/Support (Monthly)	1	145.00	\$145.00
IVR and Line Maintenance (Monthly)	1	125.00	\$125.00
Electronic Storage	1	41.44	\$41.44

TOTAL \$53,092.77

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
 Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
 400 W. Brown Deer Road, Bayside, WI 53217
 Routing Number 075000022
 Account Number 182377466541 (AB Data, Ltd.)
 Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

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Defendants.

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DECLARATION OF RUSSELL L. LAMB

I, Russell L. Lamb, hereby declare and state as follows:

1. I am the President and co-founder of Monument Economics Group, an economic consulting firm based in Arlington, Virginia. I am retained as an expert for Plaintiffs KPH Healthcare Services, Inc. a/k/a Kinney Drugs, Inc., FWK Holdings, and César Castillo LLC on behalf of a Settlement Class of Direct Purchaser Plaintiffs in the above-referenced action. I submit this Declaration in connection with the Mylan Settlement. I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

2. I will work collaboratively with the Settlement Administrator, A.B. Data, Ltd., to effectuate the Court-approved Plan of Allocation for the Mylan Settlement. I estimate that I will incur additional expenses in the amount of between \$50,000 and \$150,000 in finally distributing the Mylan Settlement to the Class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2025.



Russell L. Lamb