

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE: LOESTRIN 24 FE ANTITRUST
LITIGATION

MDL No. 2472

Master File No. 1:13-md-2472-S-PAS

THIS DOCUMENT RELATES TO:
Direct Purchaser Actions

**DECLARATION OF KRISTEN A. JOHNSON IN SUPPORT OF DIRECT PURCHASER
CLASS PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF
SETTLEMENT, APPROVAL OF PROPOSED PLAN OF ALLOCATION, ADOPTION
OF REPORT AND RECOMMENDATION OF MAGISTRATE JUDGE, AND ORDER
OF DISMISSAL WITH PREJUDICE**

I, Kristen A. Johnson, hereby declare as follows:

1. I am a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts, the United States District Court for the District of Massachusetts, and the United States Courts of Appeals for the First, Second, and Third Circuits and have been admitted *pro hac vice* in this Court. I am a partner at Hagens Berman Sobol Shapiro LLP, counsel for plaintiff Ahold USA, Inc. and co-lead counsel for the direct purchaser class in this matter. I submit this declaration in support of Direct Purchaser Class Plaintiffs' Unopposed Motion for Final Approval of Settlement, Approval of Proposed Plan of Allocation, Adoption of Report and Recommendation of Magistrate Judge, and Order of Dismissal with Prejudice.

2. On April 6, 2020, RG/2 Claims Administration LLC disseminated the Court-approved settlement notice ("Notice") via First Class U.S. mail to the last known addresses of all direct purchaser class members.¹ Though not required, RG/2 also disseminated notice to all class members via electronic mail. The Notice was also publicly posted on a website created

¹ See Declaration of Tina Chiango Regarding Notice of Settlement to the Direct Purchaser Class ¶ 8 (filed herewith). The Notice was mailed to multiple known addresses for certain class members. *Id.*

specifically for the direct purchaser settlement in this case (www.loestrin24antitrustlitigation.com).

3. The Notice instructed direct purchaser class members that objections to the settlement should be sent in the form of a signed letter containing the objector’s name, address, telephone number, and reasons for objecting via First Class U.S. mail to all of the following:

Counsel for Defendants	Class Counsel
Peter J. Carney WHITE & CASE LLP 701 Thirteenth Street, NW Washington, DC 20005	Thomas M. Sobol Kristen A. Johnson HAGENS BERMAN SOBOL SHAPIRO LLP 55 Cambridge Parkway, Suite 301 Cambridge, MA 02142 David F. Sorensen Ellen T. Noteware BERGER MONTAGUE PC 1818 Market Street, Suite 3600 Philadelphia, PA 19103 Peter R. Kohn David C. Calvello FARUQI & FARUQI LLP 1617 JFK Boulevard, Suite 1550 Philadelphia, PA 19103 Joseph H. Meltzer Terence S. Ziegler KESSLER TOPAZ MELTZER & CHECK LLP 280 King of Prussia Road Radnor, PA 19087
Clerk of the Court	
Clerk of the United States District Court for the District of Rhode Island United States Courthouse 1 Exchange Terrace Providence, RI 02903	

The Notice further indicated that objections had to be postmarked no later than May 11, 2020.

4. Neither I nor my partner and co-counsel, Thomas M. Sobol, received any objections from class members. While our physical office is not currently staffed full-time due to the COVID-19 outbreak, attorneys and staff routinely enter the office to check mail and perform other administrative functions. No objection has been reported during those routine mail checks.

5. On August 11, 2020, the other co-lead counsel listed in the Notice (David Sorensen and Ellen Noteware of Berger Montague PC, Peter Kohn and David Calvello of Faruqi & Faruqi LLP, and Joseph Meltzer and Terence Ziegler of Kessler Topaz Meltzer & Check LLP) confirmed to me by email that none had received any objections from class members.

6. I also emailed counsel for the defendants, Peter Carney of White & Case LLP, who confirmed that the defendants had not received any objection to the settlement.

Executed this 13th day of August 2020, under the pains and penalties of perjury.

/s/ Kristen A. Johnson
Kristen A. Johnson (*pro hac vice*)
HAGENS BERMAN SOBOL SHAPIRO LLP
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003
kristenj@hbsslaw.com

CERTIFICATE OF SERVICE

I, Kristen A. Johnson, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access these filings, and notice of these filings will be sent to those parties by operation of the CM/ECF system.

Dated: August 13, 2020

/s/ Kristen A. Johnson
Kristen A. Johnson