

In support of this Motion, Subscriber Plaintiffs submit herewith the Subscriber Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Class Settlement along with the Declaration of Jennifer Keough in Support of Final Approval (Exhibit A); the Declaration of Dr. Daniel Rubinfeld in Support of Final Approval (Exhibit B); a List of Regional and National Insurers (Exhibit C); the Declaration of Dr. Joseph Mason (Exhibit D); several documents produced by the Settling Defendants during the litigation (Exhibit E, BCBS-AZ_MDL000124422; Exhibit F, CAREFIRST_ESI_06681777; Exhibit G, ARKBCBS0047016); the July 28, 2021 Letter from W. Berry to Settlement Class Counsel and Counsel for Settling Defendants (Exhibit H); and the Resume of Proposed Settlement Administrator Judge Irma E. Gonzalez (Ret.) (Exhibit I).

For these reasons, as well as those set forth in the supporting materials submitted herewith, Subscriber Plaintiffs' Motion should be granted, and the Court should enter a final approval order in the form proposed (Exhibit L). The Court should also enter the Proposed Order Appointing Settlement Administrator (Exhibit J), appointing the Honorable Irma E. Gonzalez as Settlement Administrator, and amend the Data Production Order by entering the Proposed Amended Stipulation and Order Regarding Protected Health Information and Personally Identifiable Information for Subscriber Settlement (Exhibit K).

Date: September 3, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2021, the foregoing Subscriber Plaintiffs' Motion for Final Approval of Class Settlement was filed with the Clerk of the Court and served on counsel of record via ECF.

/s/ Michael D. Hausfeld
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