STATE OF MICHIGAN
7th JUDICIAL CIRCUIT COURT
GENESEE COUNTY

Cindy Womack-Devereaux, Sue Ranney, Cheryl Drugich, Kayle Gries, Janise Norwood, Melissa Porter, Jamie McSkulin, Tamyra Ejuan Wells, Ashley Beasley, Kyle Turri, and Janie Montgomery, individually and on behalf of those similarly situated, Plaintiff, v. McLaren Health Care Corporation, Defendant.	Case No. 24-121459 Hon. B. Chris Christenson **CONSOLIDATED CLASS ACTION** **JURY TRIAL DEMANDED** **SUPPLEMENTAL JOINT DECLARATION OF SETTLEMENT CLASS COUNSEL IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS**

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**Pro Hac Vice Application Forthcoming*

SUPPLEMENTAL JOINT DECLARATION OF SETTLEMENT CLASS COUNSEL IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS

1. This Supplemental Declaration is authored and submitted jointly by Proposed Settlement Class Counsel (who have preliminarily appointed Class Counsel by this Court): E. Powell Miller of The Miller Law Firm, P.C., Gary Klinger of Milberg, PLLC, and Benjamin Johns of Shub Johns & Holbrook LLP (collectively "Class Counsel" and "Declarants").

2. Declarants have personal knowledge of the matters stated herein. If called as witnesses, Declarants could and would testify truthfully and competently thereto under oath. Each of us has decades of experience serving in court-appointed leadership positions.

3. Declarants are counsel for Plaintiffs and the Settlement Class in this action. This Supplemental Declaration, of which includes as an exhibit the Supplemental Declaration of the Settlement Administrator, Angeion Group, LLC ("Angeion"), is submitted in further support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and for Attorneys'

Fees, Costs, and Service Awards ("Final Approval"), which was filed with this Court (and posted on the "Important Documents" section of the Settlement Website[1]) on February 25, 2026.

4. Beginning shortly after the Court's December 15, 2025 preliminary approval order and continuing through the present, Class Counsel has worked closely with the Settlement Administrator, Angeion, to disseminate notice and administer the settlement.

5. In accordance with the Settlement Agreement, all Settlement Class Members were provided with 45 days to opt-out or object (or until March 16, 2026), and with 90 days to file a Claim for Settlement benefits (or until April 29, 2026). See Exhibit A, Supplemental Declaration of Angeion Group, LLC, ¶ 8.

6. There were no objections filed. Ex. A, ¶ 10. We believe this – as well as the positive affirmative participation from Class Members – is an indication that the Settlement is an outstanding recovery that will provide meaningful relief.

7. As of April 12, 2026, Angeion has received a total of 51 timely opt-outs. Ex. A, ¶ 9. Based on our experience, the number of opt-outs received here in well in line with other exemplary approved settlements. See *Olden v Gardner*, 294 F App'x 210, 217 (CA 6, 2008) (inferring that most "class members had no qualms" with settlement where 79 out of 11,000 class members objected). Altogether, out of the approximately 2,668,823 Settlement Class Members, 51 timely opted out of the Settlement, which represents 0.0019% of the Settlement Class (51 / 2,668,823). Ex. A, ¶ 9.

8. As of April 12, 2026, with approximately two weeks remaining in the Claims Period (the Claims Deadline is April 29, 2026), Angeion has received a total of approximately 139,184 Claim Forms. Ex. A, ¶ 11.

[1] https://mhccsettlement.com/important-documents.

9. As of April 12, 2026, with approximately two weeks remaining in the Claims Period, Angeion has received approximately 294 Claims for approximately $890,279.70 in Documented Losses, and Angeion's review of those Claims are ongoing. Ex. A, ¶ 12.

10. As of April 12, 2026, Angeion has received approximately 39,368 Claims requesting Credit Monitoring. Ex. A, ¶ 13

11. As of April 12, 2026, Angeion has received approximately 103,501 Claims requesting a Casy Payment. Ex. A, ¶ 14. Angeion estimates that the pro-rata Cash Payment for each Settlement Class Member who submitted a Claim Form for the pro-rata Cash Payment will be approximately $60.76. *Id.*

12. Given the foregoing, the relatively small number of opt-outs received, that there were *no* objections in a class of approximately 2.7 million individuals, and that Settlement Class Members who submitted a Claim Form will all receive meaningful relief, it is the position of Declarants that final approval of the Settlement Agreement is warranted. Altogether, based on the reaction of the Settlement Class as described here and in Angeion's Declaration, and Plaintiffs' Motion for Final Approval and supporting documents, the Settlement Agreement represents a fair, reasonable, and adequate settlement and is in the best interests of the Settlement Class, and which further indicates the reasonableness of the request for fees, costs, and Service Awards.

13. We declare under penalty of perjury under the laws of the State of Michigan and the United States of America that the foregoing is true and correct to the best of our knowledge.

Dated: April 13, 2026
Rochester, Michigan

/s/ E. Powell Miller
E. Powell Miller

Dated: April 13, 2026
Chicago, Illinois

/s/ Gary M. Klinger
Gary M. Klinger

Dated: April 13, 2026
Upper Darby, Pennsylvania

/s/ Benjamin F. Johns
Benjamin F. Johns

Exhibit A

STATE OF MICHIGAN
7th JUDICIAL CIRCUIT COURT
GENESEE COUNTY

CINDY WOMACK-DEVEREAUX, SUE RANNEY, CHERYL DRUGICH, KAYLE GRIES, JANISE NORWOOD, MELISSA PORTER, JAMIE MCSKULIN, TAMYRA EJUAN WELLS, ASHLEY BEASLEY, KYLE TURRI, and JANIE MONTGOMERY, individually and on behalf of those similarly situated, Plaintiffs, v. McLAREN HEALTH CARE CORPORATION, Defendant.	Case No. 24-121459 Hon. B. Chris Christenson

SUPPLEMENTAL DECLARATION OF MICHAEL LYNCH OF ANGEION GROUP REGARDING IMPLEMENTATION OF THE NOTICE PROGRAM

I, Michael Lynch, hereby declare under penalty of perjury under the laws of the State of Michigan that the following is true and correct:

1. I am the Executive Vice President of Client Strategy and Solutions at the class action notice and claims administration firm, Angeion Group, LLC ("Angeion"). Angeion specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans.

2. My credentials were set forth in my prior Declaration describing the work performed by Angeion to disseminate notice and perform other administrative tasks ("Notice Compliance Declaration"). *See* Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and for Attorneys' Fees, Costs, and Service Awards, Exhibit 3.

3. Angeion submits this supplemental declaration to provide the Court with an updated report on claim submissions, remailing efforts, and the individuals who have requested exclusion from the Settlement. I have personal knowledge of the information set forth in this declaration, as well

as information that has been provided to me by my colleagues in the ordinary course of business at Angeion, and if called upon as a witness could testify competently thereto.

DIRECT NOTICE EFFORTS

4. Angeion previously reported that the final Class List included a total of 2,668,823 unique Class Member records. *See* Notice Compliance Declaration ¶5.

5. On January 27, 2026, in accordance with the Settlement Agreement, Angeion commenced sending emails, in accordance with the Email Notice Program, to the 219,235 valid email addresses identified on the Settlement Class List.[1]

6. On January 29, 2026, Angeion commenced mailing notices, in accordance with the Mail Notice Program, to the 2,449,588 Class Members on the Settlement Class List who did not have a valid email address, and for whom a complete mailing address was available.[2]

7. As of April 12, 2026, Angeion has received approximately 621,233 Postcard Notices returned by the USPS as undeliverable. Angeion conducted address verification searches (commonly referred to as "skip traces") to identify updated mailing addresses for these records. As of April 12, 2026, Angeion has remailed 448,509 Postcard Notices to the updated addresses identified.

REQUESTS FOR EXCLUSION AND OBJECTIONS TO THE SETTLEMENT

8. All Settlement Class Members were provided with 45 days from the Notice date to opt out or object (on or by March 16, 2026).

9. As of April 12, 2026, Angeion has received 51 Requests for Exclusion. Attached hereto as **Exhibit A** is a list of opt outs received by Angeion.

10. As of April 12, 2026, Angeion has not received, and has not been made aware of, any Objections to the Settlement.

CLAIM FORM SUBMISSIONS

11. The deadline for Class Members to submit a Claim Form is April 29, 2026. As of April 12,

[1] In paragraph 6 of the Notice Compliance Declaration, there is a typo in the date Email Notice commenced. It was listed as January 27, 2025. Email Notice commenced on January 27, 2026.

[2] In paragraph 9 of the Notice Compliance Declaration, there is a typo in the date Mail Notice commenced. It was listed as January 29, 2025. Mail Notice commenced on January 29, 2026.

2026, Angeion has received approximately 139,184 Claim Form submissions, of which approximately 48,229 were submitted via the Settlement Website, and approximately 90,955 were submitted by mail.

11. As of April 12, 2026, Angeion has received approximately 294 claims for approximately $890,279.70 in Documented Losses. These amounts are reported at face value and have not yet been validated, reviewed, or audited.

12. As of April 12, 2026, Angeion has received approximately 39,368 claims requesting Credit Monitoring.

13. As of April 12, 2026, Angeion has received approximately 103,501 claims requesting a Cash Payment. Angeion estimates the pro rata cash payment for each Settlement Class Member who submitted a valid Claim Form for the pro rata cash payment will be approximately $61.21.

14. The Claim Form submissions are still subject to final audits, including a final assessment of each claim's validity and a review for duplicate submissions. Based on the progression of claim review, the above projections of the Documented Losses amount and the pro rata cash payment will change.

NOTICE & ADMINISTRATION COSTS

15. Through March 31, 2026, the cost to provide notice and administration services has totaled approximately $1,747,628.98.

CONCLUSION

17. It remains my professional opinion that the notice plan implemented in this Settlement provided full and proper notice to Class Members before the applicable response deadlines, and that the notice plan was the best notice practicable under the circumstances, fully comporting with due process and MCR 3.501(C).

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

Dated: April 14, 2026



MICHAEL LYNCH

Exhibit A

ANGEION GROUP
Writing the Rules

OPT OUT REPORT

Womack-Devereaux v. McLaren

1	Carrol	Smith
2	Phillip	Smith
3	Michelle	Morgan
4	Carolyn	Springate
5	Barbara	Stube
6	Douglas	Stube
7	Patrick	Groulx*
8	Sydnee	Sierakowski
9	Elila	Taylor
10	Rosanna	Troyer
11	Cody	Draves
12	Lawrence	Stover
13	Mona	Bouhamdan
14	Luke	Spencer
15	Verna	Booms
16	Harry	Booms
17	Raymond	Baur
18	Norma	Baur
19	Gayle	Thompson
20	Joann	Rabideau
21	Lawrence	Rabideau
22	Teresa	Warner
23	Gary	Warner
24	Erin	Walton
25	Camille	Earegood
26	Keith	Schreck
27	Mary	Martin
28	Denise	Stewart
29	Darren	Davy
30	Nicole	Neely
31	Kevin	Kennel
32	Julia	Ford
33	Carol	Giancola
34	Julie	Vukelich
35	Gerald	Vukelich

36	Eduardo	Godoy
37	Debra	Pratt
38	Allan	Sulier
39	Kathleen	Watson
40	LaWanda	Miller
41	Bobbie Jo	Wager
42	Matthew	Hayden
43	Lorie	Alecci
44	Larenzo	Rodriguez
45	James	Douglas
46	AnnaLee	DiGiovanni
47	Curtis	Damon
48	Rufina	Rubio Gonzalez
49	Myrna	Fournier
50	James	Hoxie
51	Kurt	Jones

* This Class Member submitted five (5) copies of his Request for Exclusion.