

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CYNTHIA RUSSO, LISA BULLARD,
RICARDO GONZALES, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS LOCAL 38 HEALTH AND
WELFARE FUND, INTERNATIONAL
UNION OF OPERATING ENGINEERS
LOCAL 295-295C WELFARE FUND, and
STEAMFITTERS FUND LOCAL 439, on
Behalf of Themselves and All Others Similarly
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 1:17-cv-02246

CLASS ACTION

Judge Edmond E. Chang

**DECLARATION OF ERIC J. MILLER OF A.B. DATA, LTD. REGARDING
NOTIFICATION OF SETTLEMENT, OPT-OUTS RECEIVED, AND CLAIMS
RECEIVED FROM SETTLEMENT CLASS MEMBERS**

I, Eric J. Miller, declare under penalty of perjury pursuant to 28 U.S.C. §1746 as follows:

1. I am the Senior Vice President of Case Management at A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), whose corporate office is located in Milwaukee, Wisconsin. My business address is 5080 PGA Boulevard, Suite 209, Palm Beach Gardens, FL 33418, and my telephone number is (561) 336-1801. I have personal knowledge of the matters stated herein, and if called upon, I could and would competently testify thereto.

2. I respectfully submit this Declaration to report the status of the Notice Plan, including Notice to Settlement Class Members, opt-outs and objections, and claims received.

Pursuant to the Court's Order Preliminarily Approving Class Action Settlement dated November 18, 2024 (the "Preliminary Approval Order"), A.B. Data was appointed by the Court as the Settlement Administrator to effectuate the Notice Plan. ECF No. 689 at ¶7.

3. A.B. Data is not related to or affiliated with the Plaintiffs, Plaintiffs' Counsel, Defendant Walgreen Co. ("Defendant" or "Walgreens"), or Defendant's Counsel.

4. This Declaration details the steps taken by A.B. Data to implement the Notice Plan, which consisted of the following: a) direct notice to entities that are potential third-party payor ("TPP") Class Members using A.B. Data's proprietary database (the "TPP Database"); b) direct notice to individual Settlement Class Members via email; c) paid media notice (including social media and digital advertising); d) a news release disseminated over *PR Newswire*; and e) a toll-free telephone number and case-specific website to address potential Settlement Class Member inquiries. As previously stated, on November 18, 2024, A.B. Data also caused fifty-two (52) CAFA Notices to be sent via the United States Postal Service ("USPS") Priority Mail or Certified Mail (where Priority Mail was not available) and three (3) via e-mail as requested by certain States, to the United States Attorney General, the Attorneys General of each of the 50 States and the District of Columbia, and the Attorneys General of the recognized U.S. Territories. *See* ECF No. 690.

DIRECT NOTICE

5. On December 27, 2024, A.B. Data mailed the short-form notice formatted as a postcard ("Postcard Notice") via USPS First-Class Mail to 42,682 entities in A.B. Data's TPP Database. These entities include insurance companies, health maintenance organizations, self-insured entities, pharmacy benefits managers ("PBMs"), third-party administrators ("TPAs"), and other entities that represent potential TPP Settlement Class Members. For any postcards returned

undeliverable, A.B. Data searched for updated addresses via skip-tracing, and promptly re-mailed notice to the 1,668 entities for whom an updated address was located. A total of 496 were returned to us undeliverable with no updated address located. A copy of the Postcard Notice is attached as **Exhibit A**.

6. In addition, on December 27, 2024, A.B. Data sent 1,202 emails to entities in the TPP Database with available email addresses. 1,184 were delivered.

7. Starting on December 17, 2024 and continuing through January 16, 2025, A.B. Data sent 98,677,042 email notices to individual Settlement Class Members who had Contact Information in Walgreens' records and whose email addresses were determined to be potentially valid. A copy of the email notice sent to individual Settlement Class Members is attached as **Exhibit B**.

8. Of the emails that A.B. Data sent, 87,442,339 emails were delivered while 9,999,622 were bounced back.

PAID MEDIA

9. A.B. Data implemented a paid media program, including digital and social media advertising, to reach potential Settlement Class Members. Digital and social media advertising ran for 30 days to ensure ample time to deliver the targeted impressions to drive potential Settlement Class Members to the Settlement Website.

10. Between December 17, 2024 and January 16, 2025, digital banner and social media ads appeared on various websites and social media platforms (including Google Display Network, Facebook, Instagram, and YouTube). The banner ads included an embedded and trackable link to the case-specific website (SavingsClubSettlement.com). There were 68,484,638 impressions.

11. To reach potential individual and TPP Class Members, banner ads also appeared on BenefitNews.com, SHRM.org, and ThinkAdvisor.com/life-health.

12. Samples of the individual and TPP digital banner ads as they appeared on several websites are attached as **Exhibit C**.

13. Between December 17, 2024 and January 16, 2025, A.B. Data purchased sponsored-search listings on Google and Google Search Partners. When a person searched for a specific target phrase and/or keyword in a search engine, the link to the case-specific website may have appeared on the search result pages. Sample keyword terms or phrases may have included “Prescription class action,” “Walgreens prescription Settlement,” “Walgreens litigation,” and many others. There were 25,069 impressions.

EARNED MEDIA

14. To complement the direct and paid media notice, A.B. Data distributed the Short-Form Notice, formatted as a news release, via *PR Newswire’s* US1 Newswire on December 23, 2024. This news release reached traditional media outlets (television, radio, newspapers, magazines), news websites, and journalists nationwide.

15. News about the settlement was also broadcast to the news media via X, the platform formerly known as Twitter. It was issued from *PR Newswire’s* and A.B. Data’s X accounts to media outlets, journalists, and other followers. In addition, several media outlets in states across the US, including, for example, a number of FOX, CBS, NBC, and ABC affiliates, published stories alerting Class members of the Settlement, their potential stake in the Settlement funds, and directing them to the Settlement website for more information and to file a claim.

16. A true and correct copy of the press release as it appeared is attached as **Exhibit D**.

TELEPHONE HELPLINE AND WEBSITE

17. On December 17, 2024, A.B. Data established a case-specific toll-free number, 1-877-888-8386, with an interactive voice response (“IVR”) system and live operators, to assist potential Settlement Class Members with questions about the Action. Through July 25, 2025, the line received 26,453 phone calls.

18. On December 17, 2024, A.B. Data established the case-specific website, SavingsClubSettlement.com. The website contains important information regarding the Action, including the exclusion, objection, and claim filing deadlines, and the date, time, and location for the Court’s Fairness Hearing. Copies of the Long-Form Notice (attached as **Exhibit E**), Individual Claim Form (attached as **Exhibit F**), Third-Party Payor Claim Form (attached as **Exhibit G**), Complaint, Order Preliminarily Approving Settlement, Proposed Plan of Allocation, Settlement Agreement, Motion for Award of Attorneys’ Fees and Expenses, and Service Awards to Plaintiffs and other relevant documents for the settlement are posted on the website and available for potential Settlement Class Members to download. In addition, the website provided Settlement Class Members with the ability to submit their Claim Form through the website up until the final individual claim form deadline of June 16, 2025. The website is accessible 24 hours a day, 7 days a week.

19. Through July 25, 2025, the website had 1,932,278 visitors.

REPORT ON OPT OUT REQUESTS

20. The deadline for Class Members to request exclusion from the Class (the “Opt-Out Deadline”) was March 18, 2025. As of the exclusion deadline, A.B. Data received 79 exclusion requests from individual Settlement Class Members, and one (1) exclusion request from TPP Settlement Class Members, not including the 11 exclusion requests submitted by certain Blue

Cross Blue Shield entities (the “Blues”) and Health Care Service Corporation (“HCSC”), which are separately addressed. *See* ECF Nos. 723-726, 728-729, 755-758.¹ The list of individuals and the TPP who requested exclusion is attached as **Exhibits H-1 and H-2**. A.B. Data notes that 25 exclusion requests from individuals have been deemed deficient and invalid.² Further, the 11 exclusion requests from the Blues and HCSC have not been included on Exhibits H-1 and H-2 pending the Court’s ruling on Plaintiffs’ Motion to Deny Exclusion Requests and Overrule Objections to the Opt-Out Procedure. *See* ECF Nos. 723-726.

REPORT ON OBJECTIONS

21. The deadline for Settlement Class Members to object to the Settlement and/or request to speak in person at the Fairness Hearing was March 18, 2025. Objections must have been filed with the Court and mailed to Class Counsel and Defendant’s Counsel on or before that date. As of the date of this Declaration, A.B. Data has received or been made aware of three objections to the Settlement and/or requests to speak in person at the Fairness Hearing. A list of those who objected to the terms of the Settlement is attached as **Exhibit I**.

22. A.B. Data received a claim form submitted by Donald Hodge, who has objected. ECF No. 703.

23. A.B. Data received three claim forms submitted by Kenneth Ries (“Mr. Ries”), who has objected. ECF No. 709. Mr. Ries submitted claims on behalf of himself and as the executor of the estates of his deceased father and mother. Each of these claims are for under \$10,000. Mr. Ries and his father are Known Claimants, while his mother is an Unknown Claimant.

¹ While the Blues and HCSC purport to opt out approximately 24,000 administrative services only (“ASO”) clients, each Blue and HCSC also filed claims on behalf of these same ASO clients.

² These 25 opt-out requests have been deemed deficient and invalid because they did not provide a telephone number and/or did not provide a social security number. Exhibit H-1 represents the list of individuals with valid opt-out requests. Exhibit H-2 represents a list of individuals with invalid opt-out requests and the reason for the invalidity.

24. A.B. Data received an opt out request from Steven David Bentley (“Mr. Bentley”), dated March 18, 2025, which is attached hereto as **Exhibit J**. Mr. Bentley also has objected to the Settlement. ECF No. 708. Because Mr. Bentley submitted both an objection and an opt out request, which generally are mutually exclusive options, I contacted Mr. Bentley to ask whether he wanted to submit an objection *or* an opt out request. When I spoke to him by phone with Class Counsel, Mr. Bentley advised that he wanted to opt out of the Settlement. However, when I emailed him to confirm his decision in writing (attached as **Exhibit K**), he responded via text, “I still have a feeling of wanting to object in front of the judge.” The text string between Mr. Bentley and myself is attached as **Exhibit L**. Thus, A.B. Data understands that Mr. Bentley wishes to maintain both his opt-out request and his objection.

REPORT ON CLAIMS RECEIVED

25. Through the claim form deadline, A.B. Data received 17,140,542 claim forms from individuals and 5,142 claim forms from TPP claimants. This is consistent with A.B. Data’s experience in serving as claims administrator for other pharmaceutical class action settlements. A.B. Data will process, examine, review for potential fraudulent activity related to claims filing, and once its initial review is complete, it will send deficiency notices to any Settlement Class Members who did not complete or provide valid documentation as needed.³ This process will not be completed for several months, and A.B. Data is not able to estimate at this time the number of Settlement Class Member claims that will be ultimately approved.

³ As explained in prior filings, the Blues and HCSC have attempted to opt out more than 24,000 ASO clients. Plaintiffs have moved to deny those exclusion requests. ECF Nos. 723-726. Upon examination of the Blues’ and HCSC’s exclusion requests and the lists of ASO clients, A.B. Data discovered several instances where an ASO client had directly submitted a claim but also were included on one of the opt out lists. ECF No. 758, ¶3. Pending the Court’s ruling on Plaintiffs’ motion, A.B. Data is treating the ASO clients’ claims as valid and those claims are included in this tally.

CONCLUSION

26. The direct notice campaign successfully delivered Email Notice to 87,442,339 individuals on the who had Contact Information in Walgreens' records and whose email addresses were determined to be potentially valid, which represents a 88.6% delivery rate. Moreover, Postcard Notice was successfully delivered to 42,186 entities in A.B. Data's TPP Database and 1,184 emails were successfully delivered to entities in the TPP Database with available email addresses. Additionally, the media notice campaign delivered over 68 million impressions to potential Settlement Class Members, while the earned media and news coverage concerning the Settlement provided additional awareness.

27. While precise reach is not calculable given the unknown Settlement Class size, it remains my professional opinion that the Notice Plan implemented in this Settlement provided full and proper notice to members of the Settlement Class before the applicable response deadlines, and that the Notice Plan is the best notice practicable under the circumstances, fully comporting with due process and Fed. R. Civ. P. 23.

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

Executed on July 31, 2025, in Palm Beach Gardens, Florida.



Eric J. Miller
Senior Vice President, A.B. Data, Ltd.

EXHIBIT A

LEGAL NOTICE

Third-Party Payors: If you paid or reimbursed costs for a prescription drug purchased using insurance at Walgreens, You Could Get Money from a Settlement.

Your rights may be affected by the proposed Settlement in a class action lawsuit with Defendant Walgreen Co. (“Walgreens”).¹ The lawsuit relates to how Walgreens determined its usual and customary prices in submitting claims for prescription reimbursement, including whether it should have considered its Prescription Savings Club (“PSC”) prices when determining its usual and customary prices. Walgreens denies any wrongdoing and maintains that it correctly reported its retail prices as its usual and customary prices.

In re Walgreens Savings Club Litigation Settlement
c/o A.B. Data, Ltd.
P.O. Box 173067
Milwaukee, WI 53217

Postmaster: Please DO NOT Cover Up Barcode

¹ Walgreens includes all pharmacies owned and operated by Walgreen Co., or any of its affiliates, but only to the extent and for the time period they accepted Walgreens’ PSC during the Settlement Class Period.

Am I included? You may be included if you are an entity in the United States and its territories who paid, in whole or in part, at any point in time from January 1, 2007 through November 18, 2024, for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s). A more detailed notice, including the full class definition, which includes individuals, and as well as who is not included, is available at www.SavingsClubSettlement.com.

What does the Settlement provide? A \$100 million Settlement Fund, less attorneys' fees and expenses; service awards; notice and administration costs; taxes, tax expenses, and escrow fees; and other Court-approved costs, will pay money to eligible individuals, health insurers, and other third-party payors.

How can I get a payment? Submit a claim form online or by mail postmarked by April 17, 2025. If your claim is valid, you will get money from the Settlement. The amount of your payment will be based on the number of valid claims and how much you (and other Settlement Class Members) paid for one or more prescription drugs from Walgreens from January 1, 2007 through November 18, 2024, where prescription insurance benefits were used in filling the prescription(s). Detailed instructions on how to submit a claim are also available at www.SavingsClubSettlement.com.

What are my rights? Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue Walgreens yourself, you must exclude yourself from the Settlement by March 18, 2025. If you do not exclude yourself, you may object to the Settlement by March 18, 2025. The Court will hold a hearing on September 10, 2025, at 12:15 p.m. CST to consider whether to approve the Settlement and a request for attorneys' fees up to 30% of the Settlement Fund as well as out-of-pocket costs, expenses, and charges not to exceed \$3,000,000, and interest, as well as service awards of \$15,000 to each fund class representative and \$5,000 to each individual class representative, and notice and administration costs. You or your own lawyer may appear and speak at the hearing at your own expense. The Court may change these deadlines or the hearing date (and time). Check the website below for updates.

For more information: 1-877-888-8386 or visit www.SavingsClubSettlement.com

EXHIBIT B

QUESTIONS? CALL 1-877-888-8386 OR VISIT WWW.SAVINGSCLUBSETTLEMENT.COM.

LEGAL NOTICE

If You Purchased or Paid for a Prescription Drug with Insurance At Walgreens, A Class Action Settlement Could Affect You.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

A proposed Settlement has been reached in a class action lawsuit against Defendant Walgreen Co. (“Walgreens”) on behalf of individuals, health insurers, and other entities who pay for prescription drugs regarding Walgreens’ usual and customary pricing practices. The class action lawsuit, *Russo, et al. v. Walgreen Co.*, No. 1:17-cv-02246 (N.D. Ill.), relates to how Walgreens determined its usual and customary prices in submitting claims for prescription reimbursement, including whether it should have considered its Prescription Savings Club (“PSC”) prices in determining its usual and customary prices. Walgreens denies any wrongdoing and maintains that it correctly reported its retail prices as its usual and customary prices. The Court has not decided who is right.

The Court has preliminarily approved the proposed Settlement. To resolve the claims, the proposed Settlement will provide for \$100,000,000 to be paid by Walgreens (“Settlement Fund”). As discussed below, all Court-approved attorneys’ fees and expenses, the costs of notice and administering the Settlement, service awards, and other costs will be deducted from this amount (“Net Settlement Fund”). The Net Settlement Fund will be paid to members of the Settlement Class (defined below) who submit valid claims.

The Court has scheduled a Fairness Hearing to decide whether to approve the Settlement, the plan for allocating the Net Settlement Fund among claimants, Class Counsel’s request for attorneys’ fees and payment of litigation expenses out of the Settlement Fund, and the plaintiffs’ request for payment of services awards. The Fairness Hearing is scheduled for September 10, 2025, at 12:15 p.m. CST, before Judge Edmond E. Chang of the U.S. District Court for the Northern District of Illinois at the United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The time and date of the Fairness Hearing may change. For up-to-date information on the Fairness Hearing, check www.SavingsClubSettlement.com.

To file a claim on the settlement website, please enter the following pieces of information when prompted:

NoticeID Number: <<noticeID>>

Unique Identification Number: <<uniqueID>>

Who Is Included?

The Settlement Class is defined as follows:

- All individuals and entities in the United States and its territories who paid, in whole or in part, at any point in time from the period January 1, 2007 through November 18, 2024 (the “Settlement Class Period”), for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s).
- The following groups are excluded from the Settlement Class: (1) Walgreens and its management and affiliates, and employees of Walgreens and its affiliates; (2) the Court, members of their immediate families, and judicial staff (but not members of the immediate families of judicial staff); (3) all pharmacy benefit managers; (4) individuals who paid for all of their prescription drugs from Walgreens during the Settlement Class Period without using insurance benefits; (5) federal and state government entities other than government-funded employee benefit plans; and (6) all individuals and entities, except for the named plaintiffs, that have sued, filed an arbitration demand, or participated in a settlement in a suit against Walgreens relating to its determination of usual and customary prices in connection with the Prescription Savings Club (this exception to the exclusion from the Settlement Class does not apply to individuals or entities that have voluntarily dismissed their claims without prejudice in any suit or arbitration).

What Does The Class Action Settlement Provide?

Walgreens will pay \$100,000,000 into a Settlement Fund to settle all claims in the lawsuit brought on behalf of Settlement Class Members who are individuals, as well as health insurers and other entities who pay for prescription drugs, in whole or in part, for employees/beneficiaries.

The Settlement Fund will be distributed pursuant to a Plan of Allocation and Distribution, the latest version of which can be reviewed at www.SavingsClubSettlement.com. Class Counsel will ask the Court to award attorneys’ fees not to exceed 30% of the Settlement Fund, as well as out-of-pocket costs, expenses and charges not to exceed \$3,000,000, and interest, as well as Service Award payments to the Plaintiffs not to exceed \$5,000 to each Individual Plaintiff and \$15,000 to each Fund Plaintiff, and Notice and Administration Expenses.

The Net Settlement Fund will be distributed to members of the Settlement Class who file valid claim forms. Payments will be calculated based on the amount a claimant paid, in whole or in part, during the Settlement Class Period for the purchase of or reimbursement for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s), as described below. The precise amount that you might receive from the Net Settlement Fund will depend on how much you (and other members of the Settlement Class) paid, in whole or in part, during the Settlement Class Period for the purchase of prescription drug(s) from Walgreens, where prescription insurance benefits were used in filling the prescription(s).

To be entitled to a payment from the Net Settlement Fund, you must submit the Claim Form (and documentation, if required) found at www.SavingsClubSettlement.com by April 17, 2025.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

PARTICIPATE IN THE SETTLEMENT BY COMPLETING AND RETURNING A CLAIM FORM	To exercise your right to obtain a share of the Net Settlement Fund, you will need to complete, sign, and submit a Claim Form (and documentation, if required) by April 17, 2025. For further information about whether you qualify, the payment you may obtain, and the documentation and data you may need to submit, you may access the detailed Notice at www.SavingsClubSettlement.com or you may access a claim form at www.SavingsClubSettlement.com , or you may visit www.SavingsClubSettlement.com , or by phone at 1-877-888-8386 .
EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS	If you believe you are a member of the Settlement Class, you may choose to exclude yourself, or “opt out,” from the Settlement Class. If you decide to exclude yourself, you will not be bound by any decision in this lawsuit relating to Walgreens. This is the only option that allows you to ever be part of any lawsuit (other than this lawsuit) against Walgreens relating to the legal claims against Walgreens in this case. To exclude yourself, you will need to inform the Settlement Administrator of your decision by March 18, 2025, and provide the information set forth in the Notice found at www.SavingsClubSettlement.com . If the Settlement is approved by the Court and you do not notify the Settlement Administrator by the deadline of your election to “opt out” of the Settlement Class, you will be bound by the Settlement. If you opt out, you may not submit a Claim Form.
STAY IN THE LAWSUIT BUT OBJECT TO THE SETTLEMENT	If you object to all or any part of the proposed Settlement, plan of allocation, and/or requested attorneys’ fees, expenses, or service awards, you may write to the Court and object. You may only object to the proposed Settlement, plan of allocation, and/or requested attorneys’ fees, expenses, or service awards if you have not excluded yourself from the Settlement Class. Any objections must be submitted to the Court by March 18, 2025, and provide the information set forth below in the Notice found at www.SavingsClubSettlement.com .
DO NOTHING	If you are a member of the Settlement Class and do not file a valid claim, you will not receive any payment from the Settlement. Moreover, even if you do not file a valid claim, unless you exclude yourself from the Settlement Class, you will nevertheless be bound by past and any future Court rulings, including rulings on the Settlement, if approved, and settlement

	releases but will not be eligible to receive any payment from the Settlement.
GET MORE INFORMATION	If you would like to get more information about the case or the Settlement, you can send questions to the Settlement Administrator identified in this Notice.

FOR MORE INFORMATION AND A CLAIM FORM:
CALL 1-877-888-8386 OR VISIT WWW.SAVINGSCLUBSETTLEMENT.COM.

EXHIBIT C

Sponsored



www.savingsclubsettlement.com/

[\\$100M Class Action Settlement - Learn More](#)

Purchased or Paid for a Prescription Drug with Insurance at Walgreens? You Could Get Money from a Settlement.



**If You Purchased
or Paid for a
Prescription Drug
with Insurance at
Walgreens**

**YOU COULD GET MONEY
FROM A SETTLEMENT**

File a Claim >>

SavingsClubSettlement.com



**If You Purchased
or Paid for a
Prescription Drug
with Insurance at
WALGREENS**

**YOU COULD
GET MONEY FROM
A SETTLEMENT**

FILE A CLAIM > SavingsClubSettlement.com







If You Paid or Reimbursed Costs for a Prescription Drug Using Insurance at Walgreens

YOU COULD GET MONEY FROM A SETTLEMENT

File a Claim >>

SavingsClubSettlement.com



If You Paid or Reimbursed Costs for a Prescription Drug Using Insurance at

WALGREENS

YOU COULD GET MONEY FROM A SETTLEMENT

FILE A CLAIM > SavingsClubSettlement.com

EXHIBIT D

Robbins Geller Rudman & Dowd LLP and Scott+Scott Attorneys at Law LLP Announce A Proposed Class Action Settlement If You Purchased or Paid for a Prescription Drug With Insurance At Walgreens from January 1, 2007 through November 18, 2024

NEWS PROVIDED BY

Robbins Geller Rudman & Dowd and Scott+Scott Attorneys at Law →

Dec 23, 2024, 16:00 ET

SAN DIEGO, Dec. 23, 2024 /PRNewswire/ --

**If You Purchased or Paid for a Prescription Drug with Insurance At Walgreens,¹ A Class Action
Settlement Could Affect You.**

This is not a solicitation from a lawyer.

A proposed Settlement² has been reached in a class action lawsuit against Defendant Walgreen Co. ("Walgreens") on behalf of individuals, health insurers, and other entities who pay for prescription drugs regarding Walgreens' usual and customary pricing practices. The class action lawsuit, *Russo, et al. v. Walgreen Co.*, No. 1:17-cv-02246 (N.D. Ill.), relates to how Walgreens determined its usual and customary prices in submitting claims for prescription reimbursement, including whether it should have considered its

Prescription Savings Club ("PSC") prices in determining its usual and customary prices. Walgreens denies any wrongdoing and maintains that it correctly reported its retail prices as its usual and customary prices. The Court has not decided who is right.

The Court has preliminarily approved the proposed Settlement. To resolve the claims, the proposed Settlement will provide for \$100,000,000 to be paid by Walgreens ("Settlement Fund"). As discussed below, all Court-approved attorneys' fees and expenses, the costs of notice and administering the Settlement, service awards, and other costs will be deducted from this amount ("Net Settlement Fund"). The Net Settlement Fund will be paid to members of the Settlement Class (defined below) who submit valid claims.

The Court has scheduled a Fairness Hearing to decide whether to approve the Settlement, the plan for allocating the Net Settlement Fund among claimants, Class Counsel's request for attorneys' fees and payment of litigation expenses out of the Settlement Fund, and the plaintiffs' request for payment of services awards. The Fairness Hearing is scheduled for September 10, 2025, at 12:15 p.m. CST, before Judge Edmond E. Chang of the U.S. District Court for the Northern District of Illinois at the United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The time and date of the Fairness Hearing may change. For up-to-date information on the Fairness Hearing, check www.SavingsClubSettlement.com.

Who Is Included?

The Settlement Class is defined as follows:

- All individuals and entities in the United States and its territories who paid, in whole or in part, at any point in time from the period January 1, 2007 through November 18, 2024 (the "Settlement Class Period"), for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s).
- The following groups are excluded from the Settlement Class: (1) Walgreens and its management and affiliates, and employees of Walgreens and its affiliates; (2) the Court, members of their immediate families, and judicial staff (but not members of the immediate families of judicial staff); (3) all pharmacy benefit managers; (4) individuals who paid for all of their prescription drugs from Walgreens during the Settlement Class Period without using insurance benefits; (5) federal and state government entities other than government-funded employee benefit plans; and (6) all individuals and entities, except for the named plaintiffs, that have sued, filed an arbitration demand, or participated in a settlement in a suit against Walgreens relating to its determination of usual and customary prices in connection with the Prescription Savings Club (this exception to the exclusion from the Settlement Class does not apply to individuals or entities that have voluntarily dismissed their claims without prejudice in any suit or arbitration).

What Does The Class Action Settlement Provide?

Walgreens will pay \$100,000,000 into a Settlement Fund to settle all claims in the lawsuit brought on behalf of Settlement Class Members who are individuals, as well as health insurers and other entities who pay for prescription drugs, in whole or in part, for employees/beneficiaries.

The Settlement Fund will be distributed pursuant to a Plan of Allocation and Distribution, the latest version of which can be reviewed at www.SavingsClubSettlement.com. Class Counsel will ask the Court to award attorneys' fees not to exceed 30% of the Settlement Fund, as well as out-of-pocket costs, expenses and charges not to exceed \$3,000,000, and interest, as well as Service Award payments to the Plaintiffs not to exceed \$5,000 to each Individual Plaintiff and \$15,000 to each Fund Plaintiff, and Notice and Administration Expenses.

The Net Settlement Fund will be distributed to members of the Settlement Class who file valid claim forms. Payments will be calculated based on the amount a claimant paid, in whole or in part, during the Settlement Class Period for the purchase of or reimbursement for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s), as described below. The

precise amount that you might receive from the Net Settlement Fund will depend on how much you (and other members of the Settlement Class) paid, in whole or in part, during the Settlement Class Period for the purchase of prescription drug(s) from Walgreens, where prescription insurance benefits were used in filling the prescription(s).

To be entitled to a payment from the Net Settlement Fund, you must submit the Claim Form (and documentation, if required) found at www.SavingsClubSettlement.com by **April 17, 2025**.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

<p>PARTICIPATE IN THE SETTLEMENT BY COMPLETING A CLAIM FORM</p>	<p>To exercise your right to obtain a share of the Net Settlement Fund, you will need to complete, sign, and submit a Claim Form (and documentation, if required) by April 17, 2025. For further information about whether you qualify, the payment you may obtain, and the documentation and data you may need to submit, you may access the detailed Notice at www.SavingsClubSettlement.com or you may access a claim form at www.SavingsClubSettlement.com, or you may visit www.SavingsClubSettlement.com, or by phone at 1-877-888-8386.</p>
<p>EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS</p>	<p>If you believe you are a member of the Settlement Class, you may choose to exclude yourself, or "opt out," from the Settlement Class. If you decide to exclude yourself, you will not be bound by any decision in this lawsuit relating to Walgreens. This is the only option that allows you to ever be part of any lawsuit (other than this lawsuit) against Walgreens relating to the legal claims against Walgreens in this case. To exclude yourself, you will need to inform the Settlement Administrator of your decision by March 18, 2025, and provide the information set forth in the Notice found at www.SavingsClubSettlement.com. If the Settlement is approved by the Court and you do not notify the Settlement Administrator by the deadline of your election to "opt out" of the Settlement Class, you will be bound by the Settlement. If you opt out, you may not submit a Claim Form.</p>
<p>STAY IN THE LAWSUIT BUT OBJECT TO THE SETTLEMENT</p>	<p>If you object to all or any part of the proposed Settlement, plan of allocation, and/or requested attorneys' fees, expenses, or service awards, you may write to the Court and object. You may only object to the proposed Settlement, plan of allocation, and/or requested attorneys' fees, expenses, or service awards if you have not excluded yourself from the Settlement Class. Any objections must be submitted to the Court by March 18, 2025, and provide the information set forth below in the Notice found at www.SavingsClubSettlement.com.</p>
<p>DO NOTHING</p>	<p>If you are a member of the Settlement Class and do not file a valid claim, you will not receive any payment from the Settlement. Moreover, even if you do not file a valid claim, unless you exclude yourself from the Settlement Class, you will nevertheless be bound by past and any future Court rulings, including rulings on the Settlement, if approved, and settlement releases but will not be eligible to receive any payment from the Settlement.</p>
<p>GET MORE INFORMATION</p>	<p>If you would like to get more information about the case or the Settlement, you can send questions to the Settlement Administrator identified in this Notice.</p>

CALL: 1-877-888-8386 OR VISIT:

WWW.SAVINGSCLUBSETTLEMENT.COM

Inquiries, other than requests for the Notice and Claim Form, should be made to Plaintiffs' Lead Counsel:

David Mitchell

Arthur L. Shingler III

Robbins Geller Rudman & Dowd LLP

655 West Broadway, Suite 1900

San Diego, CA 92101

Joseph P. Guglielmo

Erin G. Comite

Scott+Scott Attorneys at Law LLP

The Helmsley Building, 230 Park Ave, 24th Floor

New York, NY 10169

¹ Walgreens includes all pharmacies owned and operated by Walgreen Co., or any of its affiliates, but only to the extent and for the time period they accepted Walgreens' PSC during the Settlement Class Period.

² Unless otherwise defined herein, capitalized terms shall be those defined in the Stipulation of Class Action Settlement which can be found at **www.savingsclubsettlement.com**.

SOURCE Robbins Geller Rudman & Dowd and Scott+Scott Attorneys at Law

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QUESTIONS? CALL 1-877-888-8386 OR VISIT WWW.SAVINGSCLUBSETTLEMENT.COM.

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

If You Purchased or Paid for a Prescription Drug with Insurance At Walgreens,¹ A Class Action Settlement Could Affect You.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

INFORMATION REGARDING CLASS ACTION SETTLEMENT

A proposed Settlement² has been reached in a class action lawsuit on behalf of individuals, health insurers, and other entities who pay for prescription drugs regarding Walgreens' usual and customary pricing practices. The class action lawsuit, *Russo, et al. v. Walgreen Co.*, No. 1:17-cv-02246, relates to how Walgreens determined its usual and customary prices in submitting claims for prescription reimbursement, specifically whether it should have considered its Prescription Savings Club prices in determining its usual and customary prices. Walgreens denies any wrongdoing and maintains that it correctly reported its retail prices as its usual and customary prices. The Court has not decided who is right.

The Court has preliminarily approved the proposed Settlement described in this Notice. To resolve the claims, the proposed Settlement will provide for \$100,000,000 to be paid by Walgreens. As discussed below, all Court-approved attorneys' fees and expenses, the costs of notice and administering the Settlement, service awards, and other costs will be deducted from this amount ("Net Settlement Fund"). The Net Settlement Fund will be paid to members of the Settlement Class (defined below) who submit valid claims.

The Court has scheduled a Fairness Hearing to decide whether to approve the Settlement, the plan for allocating the Net Settlement Fund among claimants, Class Counsel's request for attorneys' fees and payment of litigation expenses out of the Settlement Fund, and the plaintiffs' request for payment of services awards. The Fairness Hearing is scheduled for September 10, 2025, at 12:15 p.m. CST, before Judge Edmond E. Chang of the U.S. District Court for the Northern District of Illinois at the United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The time and date of the Fairness Hearing may change. For up-to-date information on the Fairness Hearing, check www.SavingsClubSettlement.com.

What Is This Action About?

Plaintiffs allege that Walgreens inflated its usual and customary ("U&C") prices by not considering the prices it charged under its Prescription Savings Club ("PSC") in determining the

¹ Walgreens includes all pharmacies owned and operated by Walgreen Co., or any of its affiliates, but only to the extent and for the time period they accepted Walgreens' PSC during the Settlement Class Period.

² Unless otherwise defined herein, capitalized terms shall be those defined in the Stipulation of Class Action Settlement which can be found at www.savingsclubsettlement.com.

U&C price, resulting in insured customers and third-party payors paying inflated amounts for prescription drugs. Plaintiffs brought claims against Walgreens for fraud, unjust enrichment, and violation of state consumer protection statutes.

Walgreens denies Plaintiffs' allegations and maintains that it acted appropriately in reporting its retail prices as its U&C prices.

Who Is Included?

The Settlement Class is defined as follows:

- All individuals and entities in the United States and its territories who paid, in whole or in part, at any point in time from the period January 1, 2007 through November 18, 2024 (the "Settlement Class Period"), for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s).
- The following groups are excluded from the Settlement Class: (1) Walgreens and its management and affiliates, and employees of Walgreens and its affiliates; (2) the Court, members of their immediate families, and judicial staff (but not members of the immediate families of judicial staff); (3) all pharmacy benefit managers; (4) individuals who paid for all of their prescription drugs from Walgreens during the Settlement Class Period without using insurance benefits; (5) federal and state government entities other than government-funded employee benefit plans; and (6) all individuals and entities, except for the named plaintiffs, that have sued, filed an arbitration demand, or participated in a settlement in a suit against Walgreens relating to its determination of usual and customary prices in connection with the Prescription Savings Club (this exception to the exclusion from the Settlement Class does not apply to individuals or entities that have voluntarily dismissed their claims without prejudice in any suit or arbitration).

What Does The Class Action Settlement Provide?

Walgreens will pay \$100,000,000 into a Settlement Fund to settle all claims in the lawsuit brought on behalf of Settlement Class Members who are individuals, as well as health insurers and other entities who pay for prescription drugs, in whole or in part, for employees/beneficiaries (known as third-party payors).

The Settlement Fund will be distributed pursuant to a Plan of Allocation and Distribution, the latest version of which can be reviewed at www.SavingsClubSettlement.com. Class Counsel will ask the Court to award attorneys' fees not to exceed 30% of the Settlement Fund, as well as out-of-pocket costs, expenses, and charges not to exceed \$3,000,000, and interest, as well as Service Award payments to the Plaintiffs not to exceed \$5,000 to each Individual Plaintiff and \$15,000 to each Fund Plaintiff, and Notice and Administration Expenses.

The Net Settlement Fund will be distributed to members of the Settlement Class who file valid claim forms. Payments will be calculated based on the amount a claimant paid, in whole or in part, during the Settlement Class Period for the purchase of or reimbursement for one or more

prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s), as described below. The precise amount that you might receive from the Net Settlement Fund will depend on how much you (and other members of the Settlement Class) paid, in whole or in part, during the Settlement Class Period, for the purchase of prescription drug(s) from Walgreens, where prescription insurance benefits were used in filling the prescription(s).

The Plan of Allocation and Distribution provides for distribution of the Settlement Fund as follows:

- The Settlement Administrator will first calculate the Net Settlement Fund amount by subtracting any Court-approved Attorneys' Fees and Expenses, Service Awards, Notice and Administration Expenses, and any other Court-approved deductions (which may include taxes, tax expenses, and escrow fees) from the total Settlement Fund.
- The Net Settlement Fund amount will be shared by all Settlement Class Members who submit valid claims. Each Settlement Class Member's claim on the Settlement Fund will be determined under only one of the two means described below, based on whether the Settlement Class Member is an individual Settlement Class Member ("Individual Claimants") or a third-party payor entity Settlement Class Member ("TPP Claimants"). The Net Settlement Fund will be divided into two (2) pools as follows: (i) Pool 1, consisting of 80% of the Net Settlement Fund, which will be distributed to TPP Claimants; and (ii) Pool 2, consisting of 20% of the Net Settlement Fund, which will be distributed to Individual Claimants. Pools 1 and 2, respectively, shall be distributed on a *pro rata* basis based on the relative size of each Pool's Recognized Claims within each Pool. Specifically:
 - For each Pool 1 Authorized Claimant, the Distribution Amount shall be that Authorized Claimant's Recognized Claim divided by the total Recognized Claims of all Pool 1 Authorized Claimants, multiplied by the total amount in the Net Settlement Fund in Pool 1, *i.e.*:

$$(80\% \text{ of Net Settlement Fund Amount}) * \frac{\text{Pool 1 Authorized Claimant's Recognized Claim Amount}}{\text{Sum of All Pool 1 Authorized Claimant's Recognized Claim Amounts}}$$

- For each Pool 2 Authorized Claimant, the Distribution Amount shall be each Pool 2 Recognized Claim divided by the total Recognized Claims of all Pool 2 Authorized Claimants, multiplied by the total amount in the Net Settlement Fund in Pool 2, *i.e.*:

$$(20\% \text{ of Net Settlement Fund Amount}) * \frac{\text{Pool 2 Authorized Claimant's Recognized Claim Amount}}{\text{Sum of All Pool 2 Authorized Claimant's Recognized Claim Amounts}}$$

As discussed above, the proposed Plan of Allocation and Distribution categorizes claimants into Individual Claimants and TPP Claimants. Individual Claimants are further grouped into Known Claimants and Unknown Claimants based on whether Walgreens identified the claimant as a potential member of the Settlement Class. There are different documentation requirements for each category of claimants, as discussed below. This is a summary of the Plan of Allocation and Distribution. For additional details, the latest version of the Plan can be reviewed at www.SavingsClubSettlement.com.

The proposed Plan of Allocation and Distribution is subject to change until the Court approves it. To view the most current version, visit www.SavingsClubSettlement.com.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

<p>PARTICIPATE IN THE SETTLEMENT BY SUBMITTING A CLAIM FORM</p>	<p>To exercise your right to obtain a share of the Net Settlement Fund, you will need to complete, sign, and submit a Claim Form (and documentation, if required) by April 17, 2025. You may fill out and submit the Claim Form found at the website www.SavingsClubSettlement.com.</p> <p>For Known and Unknown Individual Claimants, the Claim Form asks you to estimate whether, during the Settlement Class Period, you paid \$1-\$500, \$501-\$1,000, \$1,001-\$5,000, \$5,001-\$9,999, or \$10,000 or more for eligible prescription drugs from Walgreens. All Unknown Individual Claimants who have a claim in any amount and all Known Individual Claimants who claim to have paid \$10,000 or more in eligible prescription drug purchases will be required to submit supporting documentation or data sufficient to identify that Individual Claimant's payments to Walgreens for eligible prescription drug purchases.</p> <p>TPP Claimants who paid for prescription drugs, in whole or in part, for their employees/beneficiaries who purchased eligible prescription drugs will need to submit supporting documentation of data sufficient to identify the amount paid, directly or indirectly, for the eligible prescription drug purchases of their employees/beneficiaries.</p> <p>Please see the Claim Form for further details about these documentation requirements. If you have any questions, please address them by letter to the following address: <i>In re Walgreens Savings Club Litigation</i>, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173067, Milwaukee, WI 53217 or contact them by email at info@SavingsClubSettlement.com or by phone at 1-877-888-8386.</p>
<p>EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS</p>	<p>If you believe you are a member of the Settlement Class, you may choose to exclude yourself, or "opt out," from the Settlement Class. If you decide to exclude yourself, you will not be bound by</p>

	any decision in this lawsuit relating to Walgreens. This is the only option that allows you to ever be part of any lawsuit (other than this lawsuit) against Walgreens relating to the legal claims against Walgreens in this case. To exclude yourself, you will need to inform the Settlement Administrator of your decision by March 18, 2025, and provide the information set forth below in this Notice. If the Settlement is approved by the Court and you do not notify the Settlement Administrator by the deadline of your election to “opt out” of the Settlement Class, you will be bound by the Settlement. If you opt out, you may not submit a Claim Form.
OBJECT TO THE SETTLEMENT	If you object to all or any part of the proposed Settlement, plan of allocation, and/or requested attorneys’ fees, expenses, or service awards, you may write to the Court and object. You may only object to the proposed Settlement, plan of allocation, and/or requested attorneys’ fees, expenses, or service awards if you have not excluded yourself from the Settlement Class. Any objections must be submitted to the Court by March 18, 2025, and provide the information set forth below in this Notice.
DO NOTHING	If you are a member of the Settlement Class and do not file a valid claim, you will not receive any payment from the Settlement. Moreover, even if you do not file a valid claim, unless you exclude yourself from the Settlement Class, you will nevertheless be bound by past and any future Court rulings, including rulings on the Settlement, if approved, and settlement releases but will not be eligible to receive any payment from the Settlement.
GET MORE INFORMATION	If you would like to get more information about the case or the Settlement, you can send questions to the Settlement Administrator identified in this Notice.

How Do I Get A Payment?

You must submit a Claim Form by April 17, 2025, to be eligible for a payment.

- If you received a notice and a claim identification number from the Settlement Administrator, you are a Known Individual Claimant, as defined in the Plan of Allocation and Distribution, and if you want to participate in the Settlement, then you will need to submit a Claim Form in order to be eligible to obtain a share of the proposed Settlement. If you think you are a potential Settlement Class Member, please visit www.SavingsClubSettlement.com for more information and to submit a Claim Form. You will be asked to provide information or data proving that you are a member of the Settlement Class. You also may be asked to provide data showing your eligible purchases. If you are unable to access the settlement website identified above, please contact the Settlement Administrator by mail at *In re Walgreens Savings Club Litigation*, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173067, Milwaukee, WI 53217, by email at info@SavingsClubSettlement.com, or by phone at **1-877-888-8386**.

- If you did not receive a notice and a claim identification number from the Settlement Administrator, you are not a Known Individual Claimant. Instead, you are an Unknown Individual Claimant or a TPP Claimant, as defined in the Plan of Allocation and Distribution. If you think you are a potential Settlement Class Member, then you will need to submit a Claim Form in order to be eligible to obtain a share of the proposed Settlement. If you think you are a potential Settlement Class Member, please visit www.SavingsClubSettlement.com for more information and to submit a Claim Form. You will be asked to provide information or data proving that you are a member of the Settlement Class. You also will be asked to provide data showing your eligible purchases. If you are unable to access the settlement website identified above, please contact the Settlement Administrator by mail at *In re Walgreens Savings Club Litigation*, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173067, Milwaukee, WI 53217, by email at info@SavingsClubSettlement.com, or by phone at **1-877-888-8386**.
- When and whether you receive your payment depends on several matters, including whether your Claim is approved and whether and when the Court grants final approval of the Settlement. The Net Settlement Fund will be allocated to Settlement Class Members as soon as possible after the Court grants final approval of the Settlement. If the proposed Settlement is given final approval, but there is an appeal of the final approval, the appeal could take several years to resolve. In the event the Settlement is finally approved by all necessary courts, any accrued interest on the Settlement Fund will be included, consistent with the Plan of Allocation and Distribution, in the amount paid to Settlement Class Members.

What Am I Giving Up To Receive A Payment?

Unless you exclude yourself, you remain a Settlement Class Member. That means you cannot sue, continue to sue, or be part of any other lawsuit about the Plaintiffs' Released Claims in this case against Walgreens or any of the Defendant's Released Persons. Upon the effective date of the Settlement, Plaintiffs and all Settlement Class Members, on behalf of themselves and each of the Plaintiffs' Released Persons, shall be deemed to have, and by operation of the Final Judgment shall have, fully, finally, and forever waived, released, relinquished, and discharged all Plaintiffs' Released Claims against Walgreens and the Defendant's Released Persons, regardless of whether Plaintiffs and Settlement Class Members execute and deliver Claim Forms. The capitalized terms used in this paragraph are defined in the Settlement Agreements. For easy reference, those terms are copied below:

- "Defendant's Released Persons" means Walgreens and its respective legal representatives, predecessors, successors and assigns, present and former parents and subsidiaries and affiliated entities, present and former employees, partners, agents, representatives, independent contractors, officers, directors, shareholders, attorneys, accountants, managers, and all other legally associated individuals or entities.
- "Plaintiffs' Released Persons" means Plaintiffs, Settlement Class Members, and Plaintiffs' Related Parties. In turn, "Plaintiffs' Related Parties" means Plaintiffs' respective legal representatives, including Class Counsel, heirs, executors, administrators, beneficiaries,

trustees, predecessors, successors in interest, transferees and assignees, in their capacities as such.

- “Plaintiffs’ Released Claims” means all claims, demands, damages, harm, injuries, actions, causes of action, suits, proceedings, matters, disputes, obligations, costs, and losses of any kind whatsoever, whether known or Unknown Claims³, suspected or unsuspected, accrued or unaccrued, and contingent or non-contingent, which now exist or have existed upon any theory of law or equity (whether contractual, common law, statutory, federal, state, local, or otherwise), including any claims for compensatory or punitive damages, or for attorneys’ fees, costs, or disbursements of any kind, against Defendant’s Released Persons arising out of or related to the conduct challenged in the Action, including any and all claims relating to the reporting of U&C prices for pharmaceuticals, regardless of whether “usual and customary” or “U&C” appears as a defined contractual term in any relevant contract, except for claims relating to the enforcement of the Settlement Agreement.

What Are My Other Rights?

If you are a member of the Settlement Class and you do not want to be legally bound by the Settlement, you must exclude yourself. The exclusion deadline is March 18, 2025. If you do not timely exclude yourself, you will not be able to sue Walgreens or Defendant’s Released Persons for any claims relating to the lawsuit and will be bound by the Settlement, if finally approved.

To exclude yourself from the Settlement Class, you must send a letter via First-Class U.S. Mail with postage prepaid or overnight delivery to: *In re Walgreens Savings Club Litigation*, Settlement Administrator, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217 and include the following:

If you are an individual, you must include (1) the individual’s full name, current mailing address, telephone number, and social security number; (2) a statement that the individual purchased and paid for one or more prescription drugs from Walgreens during the Settlement Class Period; (3) a statement that the individual wishes to be excluded from the Settlement Class (e.g., “*I request that I be excluded from the Russo v. Walgreen Co. settlement.*”); and (4) the individual’s signature.

If you are an entity, you must include (1) the entity’s full name, current mailing address, telephone number, and Taxpayer Identification Number; (2) a statement that the entity wishes to exclude itself from the Settlement (e.g., “*I, on behalf of [entity], request that [entity] be excluded from the Russo v. Walgreen Co. settlement.*”); (3) a signature from the authorized representative of the entity along with a statement of that person’s position or authority by which he or she has the power to exclude the entity from the Settlement Class; and (4) data (i) sufficient to establish Class

³ The complete definition of “Unknown Claims” is set forth at Section 1.43 of the Settlement Agreement and includes “(a) any Plaintiffs’ Released Claims that Plaintiffs or any Settlement Class Member does not know or suspect to exist in his, her, or its favor at the time of the release of Defendant’s Released Persons which, if known by him, her, or it, might have affected such Plaintiff’s or Settlement Class Member’s settlement or decisions with respect to the Settlement, including the release of Defendant’s Released Persons or the decision not to object to or opt out of this Settlement; and (b) any Defendant’s Released Claims that Defendant does not know or suspect to exist in its favor at the time of the release of Plaintiffs’ Released Persons, which if known by it, might have affected its settlement or decision with respect to the Settlement, including the release of Plaintiffs’ Released Persons.”

membership, and (ii) reflecting all of the entity's payments for prescriptions purchased at Walgreens using insurance during the Settlement Class Period.

Settlement Class Members shall not be permitted to exclude other Settlement Class Members. Moreover, group or class-wide exclusions shall not be permitted. A request for exclusion must be submitted by each Settlement Class Member on an individual basis, and any request for exclusion by a purported authorized agent or representative of a Class Member must include proof of the representative's legal authority and authorization to act and request exclusion on behalf of each Class Member they seek to opt out. If you exclude yourself from either Class, you will not receive any benefits of the Settlement, you will not be legally bound by anything that happens in the lawsuit, and you may be able to sue (or continue to sue) Walgreens in the future about the legal issues in this case.

Your letter requesting exclusion must be postmarked no later than March 18, 2025.

A request for exclusion that does not include all of the foregoing information, that does not contain the proper signature, that is sent to an address other than the one designated above, or that is not sent within the time specified shall be invalid and the individual or entity filing such an invalid request shall be a Settlement Class Member and shall be bound by the Settlement, if approved.

If you do not exclude yourself from the Settlement Class, you may object to the Settlement by March 18, 2025.

To object to the Settlement: If you are a Settlement Class Member and you have not excluded yourself from the Settlement Class, you can object to all or any part of the proposed Settlement, Plan of Allocation and Distribution, and/or requested attorneys' fees, expenses, or service awards. You can give reasons why you think the Court should not approve it, and the Court will consider your views.

To object to the proposed Settlement, you must file or send a letter via First-Class U.S. Mail (or file electronically with the Court) saying that you object to the Settlement in *Russo, et al. v. Walgreen Co.*, No. 1:17-cv-02246 (N.D. Ill.), with the following information:

- (a) your name, address, email address, and the identity of and contact information for any attorney representing you;
- (b) the legal or factual bases for your objection;
- (c) documentation sufficient to prove your membership in the Settlement Class (such as evidence of your relevant prescription purchases or payments);
- (d) a list of any witnesses, exhibits, or legal authority that you intend to offer;
- (e) whether you intend to appear, either in person or through counsel, at the Fairness Hearing;
- (f) whether your objection applies only to yourself, to a subset of the Settlement Class, or to the Settlement Class as a whole; and
- (g) a list of all class action settlements to which you and/or your counsel have previously objected.

File or mail any objections to the Clerk of the United States District Court for the Northern District of Illinois, United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, with a copy to David Mitchell, Arthur L. Shingler III, Robbins Geller Rudman & Dowd LLP, 655 West

Broadway, Suite 1900, San Diego, CA 92101, Joseph P. Guglielmo, Erin G. Comite, Scott+Scott Attorneys at Law LLP, The Helmsley Building, 230 Park Ave, 24th Floor, New York, NY 10169, and Selina P. Coleman, Reed Smith LLP, 1301 K Street, N.W., Suite 1000 – East Tower, Washington, D.C. 20005-3373.

You also may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter via First-Class U.S. Mail saying that it is your “Notice of Intention to Appear in *Russo, et al. v. Walgreen Co.*, No. 1:17-cv-02246 (N.D. Ill.).” Be sure to include your name, address, email address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than March 18, 2025, and must be filed or sent to the Clerk of the Court and to counsel at the addresses listed in the prior paragraph. You may not be able to speak at the Fairness Hearing if you have excluded yourself from the Settlement Class or if you do not send a Notice of Intention to Appear.

The Lawyers Representing the Settlement Class

The Court has appointed Scott+Scott Attorneys at Law LLP and Robbins Geller Rudman & Dowd LLP as Class Counsel. You may contact the following lawyers regarding questions: David Mitchell, Arthur L. Shingler III, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101 or Joseph P. Guglielmo, Erin G. Comite, Scott+Scott Attorneys at Law LLP, The Helmsley Building, 230 Park Ave, 24th Floor, New York, NY 10169.

The Lawyers for the Defendants

Defendant is represented by Reed Smith LLP, including Selina P. Coleman, 1301 K Street, N.W., Suite 1000 – East Tower, Washington, D.C. 20005-3373.

If You Want More Information

If you have questions about this case or want additional information, you may visit www.SavingsClubSettlement.com; call 1-877-888-8386; or contact Class Counsel. This Notice is only a summary of the proposed Settlement and is qualified in its entirety by the terms of the Settlement Agreement. Copies of the Settlement Agreement are on public file with the United States District Court for the Northern District of Illinois Courthouse, 219 South Dearborn Street, Chicago, IL 60604. The Settlement Agreement is also available on the Settlement website: www.SavingsClubSettlement.com.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE
TO INQUIRE ABOUT THE SETTLEMENT OR THE CLAIMS PROCESS.**

FOR MORE INFORMATION AND TO SUBMIT A CLAIM:
CALL 1-877-888-8386 OR VISIT WWW.SAVINGSCLUBSETTLEMENT.COM.

EXHIBIT F

**MUST BE SUBMITTED
ONLINE OR POSTMARKED
ON OR BEFORE
April 17, 2025**

Russo v. Walgreen Co.
No. 1:17-cv-02246 (N.D. Ill.)

FOR OFFICIAL USE ONLY

Individual Claim Form Instructions

If you are a Class Member who is an individual, you may file a claim requesting a share of the Settlement Fund. You must complete this Claim Form and mail it to the Settlement Administrator at the address provided below or submit it online at www.SavingsClubSettlement.com. A mailed form must be postmarked, and an online form must be submitted, by no later than **April 17, 2025**.

You must complete all required sections of the attached Claim Form:

1. Complete *Section A*. Provide your name and contact information.
2. Review and complete *Section B*. Confirm you qualify to file a claim.
3. Complete *Section C*. Provide information about your total purchases of the prescription drug(s) you paid for with insurance at Walgreens¹ from January 1, 2007 through November 18, 2024.
4. Review *Section D* and provide documentation (if required).
5. Review *Section E* and sign the Claim Form. If you sign the Claim Form, you certify (or swear under penalty of perjury) that the information you provided is true and correct to the best of your knowledge and that you qualify to submit a claim (as described in *Section B*).

You have two options to submit your Claim Form:

- You can mail your completed and signed Claim Form, and any supporting documents (if required), postmarked no later than **April 17, 2025**, to:

In re Walgreens Savings Club Litigation Settlement
c/o A.B. Data, Ltd.
P.O. Box 173067
Milwaukee, WI 53217

OR

- You can complete and submit the Claim Form and upload supporting documents (if required) on the Settlement website, www.SavingsClubSettlement.com, no later than **April 17, 2025**. After you complete the online Claim Form, you will receive a receipt saying that your claim was submitted.

If your completed Claim Form is not postmarked or received online by **April 17, 2025**, you will not receive a payment from this Settlement. Submitting a Claim Form does not guarantee that you will receive a payment from the Settlement.

¹ Walgreens includes all pharmacies owned and operated by Walgreen Co., or any of its affiliates, but only to the extent and for the time period they accepted Walgreens' Prescription Savings Club during the Settlement Class Period.

**MUST BE SUBMITTED
ONLINE OR
POSTMARKED ON OR
BEFORE
April 17, 2025**

In re Walgreens Savings Club Litigation Settlement

INDIVIDUAL CLAIM FORM

Use Blue or Black Ink Only

Attention: This form should only be filled out if you are an individual. If you are not an individual, please do not use this form. A Third-Party Payor Claim Form for non-individuals is available at www.SavingsClubSettlement.com.

Section A: Claimant Identification

Claimant's Name

Agent/Legal Representative (if any)

Street Address

City

State

Zip Code

Mobile Telephone Number

Email Address*

Notice Identification Number (if provided by Settlement Administrator)

*By providing your email address, you authorize the Settlement Administrator to use that email address to send you information relevant to this claim. Neither your mobile telephone number nor your email will be used or disseminated beyond what is needed for this settlement.

All settlement payments will be sent digitally. Please ensure you provide a current, valid email address and mobile telephone number with your claim submission. If the email address or mobile telephone number you provide becomes invalid for any reason, you must notify the Settlement Administrator. It is your responsibility to provide accurate contact information to the Settlement Administrator to make sure you receive your payment. When you receive the email and/or mobile phone text notifying you about your settlement payment, you will be provided with a number of digital payment options, such as PayPal, Venmo, Apple Pay, Amazon, or direct deposit. You will be able to select from these options to receive your settlement payment. The email and/or mobile phone text will also give you the option to request a paper check.

Section B: Should I File a Claim Form?

To be eligible to file a claim form and receive a cash distribution from the proposed Settlement as an individual, you must be a person, in the United States and its territories, who paid for some or all of the purchase price of one or more prescription drugs from Walgreens, where you used prescription insurance benefits when filling the prescription, at any time from January 1, 2007 through November 18, 2024.

Several individuals and entities are not included in the Settlement Class and are not eligible to file a claim form and receive a cash distribution from the proposed Settlement, even if they otherwise meet the definition above. The following individuals and entities are excluded from the Settlement Class: (1) Walgreens and its management and affiliates, and employees of Walgreens and its affiliates; (2) the Court, members of their immediate families, and judicial staff (but not members of the immediate families of judicial staff); (3) all pharmacy benefit managers; (4) individuals who paid for all of their prescription drugs from Walgreens from January 1, 2007 through November 18, 2024, without using insurance benefits; (5) federal and state government entities other than government-funded employee benefit plans; and (6) all individuals and entities, except for the named plaintiffs in this case, that have sued, filed an arbitration demand, or participated in a settlement in a suit against Walgreens relating to its determination of usual and customary prices in connection with the Prescription Savings Club (this exception to the exclusion from the Settlement Class does not apply to individuals or entities that have voluntarily dismissed their claims without prejudice in any suit or arbitration).

If you excluded yourself from the Settlement Class, you may not file a claim.

- ☐ By checking this box, I confirm that I have read the definition of the Settlement Class and I am not excluded from participating in the proposed Settlement.

Section C: Purchase Information

Please estimate the total amount of money that you, and NOT insurance, paid out-of-pocket for one or more prescription drugs from Walgreens, where insurance benefits were used in filling the prescription(s) from January 1, 2007 through November 18, 2024, for which you have not been reimbursed from any source.

Estimated total amount of unreimbursed out-of-pocket expenditures you paid for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s) from January 1, 2007 through November 18, 2024: (Please check ONE.)

- ☐ \$1-\$500
☐ \$501-\$1,000
☐ \$1,001-\$5,000
☐ \$5,001-\$9,999
☐ \$10,000 or more

Section D: Proof of Payment and Note Regarding Documentation

If you received notice and a Notice Identification Number from the Settlement Administrator, you do not need to provide any documentation at this time if the estimated total amount of your unreimbursed out-of-pocket expenditures for one or more prescription drugs purchased from Walgreens from January 1, 2007 through November 18, 2024, where prescription benefits were used in filling the prescription(s), is less than \$10,000. However, the Settlement Administrator may ask for additional proof supporting your claim.

If you did not receive notice and a Notice Identification Number from the Settlement Administrator, or if the total amount of your unreimbursed out-of-pocket expenditures for one or more prescription drugs purchased from Walgreens from January 1, 2007 through November 18, 2024, where prescription benefits were used in filling the prescription(s), is \$10,000 or more, you must provide documents as proof to support your claim.

You can submit any of the following documents to support the purchase information you put in Section C (above): itemized receipts, cancelled checks, invoices, statements, or other business or transaction records showing the amount you paid for purchases for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s), from January 1, 2007 through November 18, 2024.

Please submit your supporting documents with your completed claim form.

Section E: Certification

I have read and am familiar with the contents of this Claim Form. I certify that the information I have set forth above is true, correct, accurate, and complete to the best of my knowledge. I certify that I, to the best of my knowledge, paid a total amount within the estimate range I provided in Section C (above) in unreimbursed out-of-pocket expenditures for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s), from January 1, 2007 through November 18, 2024. I further certify that I did not opt out of the Settlement Class in this Action.

In addition: (a) I am not a member of Walgreens or any Walgreens affiliates' management, nor am I an employee of Walgreens and its affiliates; (b) I am not the Court, nor am I a member of the Court's immediate family, or a member of the Court's judicial staff; (c) I am not a pharmacy benefit manager; (d) I did not pay for all of my prescription drugs from Walgreens from January 1, 2007 through November 18, 2024, without using insurance benefits; (e) I am not a federal or state government entity other than government-funded employee benefit plan; and (f) with the exception of individuals or entities that have voluntarily dismissed their claims without prejudice in any suit or arbitration, I am not an individual or entity, except for the named plaintiffs, that has sued, filed an arbitration demand, or participated in a settlement in a suit against Walgreens relating to its determination of usual and customary prices in connection with the Prescription Savings Club.

To the extent I have been given authority to submit this Claim Form by a Settlement Class Member on his or her behalf, and accordingly am submitting this Claim Form in the capacity of an Authorized Agent with authority to submit it by the Settlement Class Member identified on this form, and to the extent I have been authorized to receive on behalf of this Settlement Class Member(s) any and all amounts that may be allocated to him or her from the Settlement Fund, I certify that such authority has been properly vested in me and that I will fulfill all duties I may owe the Settlement Class Member. In the event amounts from the Settlement Fund are distributed to me and a Settlement Class Member later claims that I did not have the authority to claim and/or receive such amounts on its behalf, I and/or my employer will hold the Settlement Class, counsel for the Settlement Class, and the Settlement Administrator harmless with respect to any claims made by the Settlement Class Member.

I hereby submit to the jurisdiction of the United States District Court for the Northern District of Illinois for all purposes connected with this Claim Form, including resolution of disputes relating to this Claim Form. I acknowledge that any false information or representations contained herein may subject me to sanctions, including the possibility of criminal prosecution. I agree to supplement this Claim Form by providing documents as proof for the information I provided herein, upon request of the Settlement Administrator.

I certify that the above information supplied by the undersigned is true and correct to the best of my knowledge, and this Claim Form was executed this _____ day of _____ 202_.

Signature

Print or Type Name

Authorized Agent Signature (if applicable)

Print or Type Name

If you did not complete this Claim Form online and submit it electronically through the Settlement website, you must mail your completed Claim Form postmarked on or before **April 17, 2025**, to the following address:

In re Walgreens Savings Club Litigation Settlement

c/o A.B. Data, Ltd.

P.O. Box 173067

Milwaukee, WI 53217

Toll-Free Telephone: **1-877-888-8386**

Website: www.SavingsClubSettlement.com

REMINDER CHECKLIST:

1. Please complete, sign, and mail the above Claim Form or complete the online Claim Form. Attach or upload any documents supporting your claim (if applicable).
2. Keep a copy of your Claim Form and supporting documents for your records.
3. If you would like a receipt acknowledging your Claim Form was received, please complete the form online or mail this form via Certified Mail, Return Receipt Requested.
4. If you move and/or your name changes, please send your new address and/or your new name or contact information to the Settlement Administrator at info@SavingsClubSettlement.com or via U.S. Mail at the address above.

EXHIBIT G

Russo v. Walgreen Co.
No. 1:17-cv-02246 (N.D. Ill.)

THIRD-PARTY PAYOR CLAIM FORM

YOUR CLAIM MUST BE POSTMARKED OR SUBMITTED ONLINE ON OR BEFORE **APRIL 17, 2025**.

Submit the Claim Form at the Settlement website, www.SavingsClubSettlement.com, OR

Mail your claim to: *In re Walgreens Savings Club Litigation Settlement*, c/o A.B. Data, Ltd., P.O. Box 173067, Milwaukee, WI 53217.

ATTENTION: THIS FORM IS ONLY TO BE FILLED OUT ON BEHALF OF A THIRD-PARTY PAYOR ("TPP") CLASS MEMBER (OR AN AUTHORIZED AGENT) AND NOT BY INDIVIDUALS. A Claim Form for Individuals is available at www.SavingsClubSettlement.com.

PART I – CLAIMANT IDENTIFICATION

- Complete Section A if you are filing as a TPP Class Member on behalf of your own company.
- Complete Section B if you are an authorized agent filing on behalf of one of more TPP Class Members.

Section A: Company or Health Plan TPP Class Member

Company or Health Plan Name

Contact Name

Address 1

Address 2

City

State

Zip

Area Code – Telephone Number

Tax Identification Number

Email Address

Claim Identification Number (if provided by Settlement Administrator)

List other names by which your company or health plan has been known or other Federal Employer Identification Numbers ("FEINs") it has used since January 1, 2007.

Health Plan Type: (Select one)

☐ Health Insurance
Company/HMO☐ Self-Insured Employee
Health Plan☐ Self-Insured Health &
Welfare Fund☐ Other (Explain)**Section B: Authorized Agent Only**

** As an Authorized Agent, please indicate how your relationship with the TPP Class Member(s) is best described: (Select one)

☐ Third-Party Administrator☐ Pharmacy Benefit Manager☐ Other (Explain)

Authorized Agent's Company Name

Contact Name

Address 1

Address 2

City

State

Zip

Area Code – Telephone Number

Authorized Agent's Tax Identification Number

Email Address

List the name and FEIN of every TPP Class Member (*i.e.*, Company or Health Plan) for whom you have been duly authorized to submit this Claim Form (attach additional sheets to this Proof of Claim as necessary). Alternatively, you may submit the information for Section A and B for each TPP Class Member in an electronic format, such as Excel or a tab-delimited text file saved on a disk or flash drive. Please contact the Settlement Administrator to determine what formats are acceptable.

TPP CLASS MEMBER'S NAME

TPP CLASS MEMBER'S FEIN

PART II – AMOUNT CLAIMED

Please type or print in the box below, the total amount paid by each TPP Class Member for one or more prescription drugs from Walgreens,¹ where prescription insurance benefits were used in filling the prescription(s), at any time from January 1, 2007 through November 18, 2024, for which the TPP Class Member was not reimbursed from any source. This amount should not include any amounts the TPP Class Member's beneficiaries paid to Walgreens, including any co-pays, deductibles, and/or co-insurance.

TPP CLASS MEMBER'S NAME	TOTAL AMOUNT PAID FOR PRESCRIPTION DRUGS

Please note that certain groups have been excluded from the Class in this case. Do not submit a claim for or on behalf of any of the following excluded groups: (a) Walgreens and its management and affiliates, and employees of Walgreens and its affiliates; (b) the Court, members of their immediate families, and judicial staff (but not members of the immediate families of judicial staff); (c) all pharmacy benefit managers; (d) individuals who paid for all of their prescription drugs from Walgreens from January 1, 2007 through November 18, 2024, without using insurance benefits; (e) federal and state government entities other than government-funded employee benefit plans; and (f) all individuals and entities, except for the named plaintiffs, that have sued, filed an arbitration demand, or participated in a settlement in a suit against Walgreens relating to its determination of usual and customary prices in connection with the Prescription Savings Club (this exception to the exclusion from the Settlement Class does not apply to individuals or entities that have voluntarily dismissed their claims without prejudice in any suit or arbitration). Also, if the TPP Class Member excluded themselves from the Settlement Class, you may not file a claim on their behalf.

Proof of Payment

You must submit claims data and information in support of the purchase amounts stated above. Instructions on how to do so are found in the Claims Documentation Requirements Section within the Third-Party Payor Claim Form Instructions on the Settlement website. The Settlement Administrator may require additional supporting documentation after reviewing your claim.

¹ Walgreens includes all pharmacies owned and operated by Walgreen Co., or any of its affiliates, but only to the extent and for the time period they accepted Walgreens' Prescription Savings Club during the Settlement Class Period.

PART III – CERTIFICATION

I have read and am familiar with the contents of this Claim Form. I certify that the information I have set forth above and in any documents attached by me are true, correct, and complete to the best of my knowledge. I certify that I, or the TPP Class Member(s) I represent, paid the total amount set forth above in expenditures for purchases for one or more prescription drugs from Walgreens, where prescription insurance benefits were used in filling the prescription(s), at any time from January 1, 2007 through November 18, 2024, and that this amount is net of any amounts a TPP Class Member's beneficiaries paid to Walgreens, including any co-pays, deductibles, and co-insurance. I further certify that I, or the Class Member(s) I represent, did not opt out of the Settlement Class in this Action.

In addition: (a) I am not (or the represented TPP Class Member(s) is/are not) a member of Walgreens or any Walgreens affiliates' management, nor am I (or is the represented TPP Class Member) an employee of Walgreens and its affiliates; (b) I am not (or the represented TPP Class Member(s) is/are not) the Court, nor am I (or is/are the represented TPP Class Member(s)) a member of the Court's immediate family, or a member of the Court's judicial staff; (c) I am not (or the represented TPP Class Member(s) is/are not) a pharmacy benefit manager; (d) all prescriptions submitted with this Claim (or these Claims) were paid for or reimbursed in conjunction with prescription drugs purchased from Walgreens from January 1, 2007 through November 18, 2024, and in which prescription insurance benefits were used in filling the prescription(s); (e) I am not (or the represented TPP Class Member(s) is/are not) a federal or state government entity other than government-funded employee benefit plan; and (f) with the exception of individuals or entities that have voluntarily dismissed their claims without prejudice in any suit or arbitration, I am not (or the represented TPP Class Member(s) is/are not) an individual or entity, except for the named plaintiffs, that has sued, filed an arbitration demand, or participated in a settlement in a suit against Walgreens relating to its determination of usual and customary prices in connection with the Prescription Savings Club.

To the extent I have been given authority to submit this Claim Form by a TPP Class Member(s) on its/their behalf, and accordingly am submitting this Claim Form in the capacity of an Authorized Agent with authority to submit it by the TPP Class Member(s) identified above and submitted with this form, I also have been authorized to receive payment on behalf of this TPP Class Member(s). In the event amounts from the Settlement Fund are distributed to me or my employer and a TPP Class Member(s) I purport to represent later claims that I did not have authority to claim and/or receive such amounts on its/their behalf, I and/or my employer will hold the TPP Settlement Class, counsel for the Settlement Class, and the Settlement Administrator harmless with respect to any claims made by the TPP Class Member(s).

I, and the TPP Class Member(s) for which I have been given authority to submit this Claim Form, hereby submit to the jurisdiction of the United States District Court for the Northern District of Illinois for all purposes connected with this Claim Form, including resolution of disputes relating to this Claim Form. I acknowledge that any false information or representations contained herein may subject me to sanctions, including the possibility of criminal prosecution. I agree to supplement this Claim Form by providing documents as proof for the information I provided herein, upon request of the Settlement Administrator.

I certify that the above information supplied by the undersigned is true and correct to the best of my knowledge and that this Claim Form was executed this _____ day of _____ 202_.

Signature

Position/Title

Print Name

Date

Authorized Agent Signature

Position/Title

Print Name

Date

If you did not complete this Claim Form online and submit it electronically through the Settlement website, you must mail your completed Claim Form with any supporting documents, postmarked on or before **April 17, 2025**, to the following address:

In re Walgreens Savings Club Litigation
c/o A.B. Data, Ltd.
P.O. Box 173067
Milwaukee, WI 53217

Toll-Free Telephone: **1-877-888-8386**

Website: www.SavingsClubSettlement.com

REMINDER CHECKLIST:

1. Please complete, sign, and mail the above Claim Form or complete the online Claim Form. Attach or upload any documentation supporting your claim.
2. Keep a copy of your Claim Form and supporting documentation for your records.
3. If you would like acknowledgement of receipt of your Claim Form, please complete the form online or mail this form via Certified Mail, Return Receipt Requested.
4. If the company you work for and/or the TPP Class Member(s) for which you have been given authority to submit this Claim Form moves or changes its name, please send the new address and/or new name or contact information to the Settlement Administrator at info@SavingsClubSettlement.com or via U.S. Mail at the address above.

EXHIBIT H-1

EXHIBIT H-1 - VALID REQUESTS FOR EXCLUSION FROM THE SETTLEMENT

Person/Entity	TPP/Individual Consumer
Donegal Mutual Insurance	TPP
Gavin Randall Hitchins	Individual Consumer
James T. Maher	Individual Consumer
Catherine Sullivan	Individual Consumer
Pamela J. Mays	Individual Consumer
Sonya Sunshine Park	Individual Consumer
David P. Pare	Individual Consumer
William Dennis Carroll	Individual Consumer
Jeane Denise Ridges	Individual Consumer
Faye A. Weckle	Individual Consumer
Sandra Ann Rempel	Individual Consumer
Ksiang L. Ke	Individual Consumer
Alexander R. MacKenzie	Individual Consumer
Diane C. Hall	Individual Consumer
Sandy Wilson Robinson	Individual Consumer
Deborah J. Barnes	Individual Consumer
Carol L. Weinfeld	Individual Consumer
Winston W. Bae	Individual Consumer
Carol Anne Walker	Individual Consumer
Colleen Jackson	Individual Consumer
Timothy Janssen	Individual Consumer
Debra Joan Langkau	Individual Consumer
Peggy E. Glaub	Individual Consumer
Christopher C. Heard	Individual Consumer
Robert Lee Gilchriest	Individual Consumer
James C. Reynolds	Individual Consumer
Maria E.G. Reynolds	Individual Consumer
Mary E. Rabon	Individual Consumer
Veronica Wenkus	Individual Consumer
Lindsay Ruby Milbourn	Individual Consumer
Lois A. Damak	Individual Consumer
Larry G. Damak	Individual Consumer
Stephanie Marie Curtis	Individual Consumer
Marie A. Cottom	Individual Consumer
Caroline L. Matthews	Individual Consumer
Bonita (Bonnie) Coghlan	Individual Consumer
Mary Elizabeth Schwan	Individual Consumer
Dominic A. Viti	Individual Consumer
Jean M. Watson	Individual Consumer
Eugene Sergey Krasnokutsky	Individual Consumer
Garrett McConnell	Individual Consumer
Jessica Coleman	Individual Consumer
Shanierra Curry	Individual Consumer

EXHIBIT H-1 - VALID REQUESTS FOR EXCLUSION FROM THE SETTLEMENT

Otega Ejegbavwo	Individual Consumer
Linda Spears	Individual Consumer
James Edward Ryan	Individual Consumer
Cheri Alexander	Individual Consumer
Tamilyn Henderson	Individual Consumer
Mary Ann Harcourt	Individual Consumer
Diane M. Van Patten	Individual Consumer
Evelyn Ong-Harmuth	Individual Consumer
Jason James Bonnema	Individual Consumer
Steven M. Colloton	Individual Consumer
Diane H Watson	Individual Consumer
Steven David Bentley	Individual Consumer

EXHIBIT H-2

EXHIBIT H-2 - INVALID REQUESTS FOR EXCLUSION FROM THE SETTLEMENT

Person/Entity	TPP/Individual Consumer	Reason for Being Invalid
Lee A. Feldman	Individual Consumer	No phone number
Elsa L. Feldman	Individual Consumer	No phone number
Mark P. Elstein	Individual Consumer	No Social Security Number
Janice Rathgeb	Individual Consumer	No Social Security Number
Sarah Nicole Pickering	Individual Consumer	No Social Security Number
Donald Ray	Individual Consumer	No Social Security Number
Ericka Nelson	Individual Consumer	No Social Security Number
Kimberly S. Staubs	Individual Consumer	No Social Security Number
Barbara Jean Prince	Individual Consumer	No Social Security Number
Dolores Grosso	Individual Consumer	No Social Security Number
Gary Place	Individual Consumer	No Social Security Number
Gloria Ormuz	Individual Consumer	No Social Security Number
Ernest Joseph Kapinos	Individual Consumer	No Social Security Number
Jason Ernest Kapinos	Individual Consumer	No Social Security Number
Julia Mary Kapinos	Individual Consumer	No Social Security Number
Sherry A. Hoppe	Individual Consumer	No phone number or SSN
Katrina F. Dotson	Individual Consumer	No phone number or SSN
Perry Jennings	Individual Consumer	No phone number or SSN
Terry Braiker	Individual Consumer	No phone number or SSN
Kimberly Gray	Individual Consumer	No phone number or SSN
Elaine C. Shelest	Individual Consumer	No phone number or SSN
Thomas E. Whitaker	Individual Consumer	No phone number or SSN
Hector Rubio-Garcia	Individual Consumer	No phone number or SSN
Nancy A Scott	Individual Consumer	No phone number or SSN
Bonnie Standbridge	Individual Consumer	No phone number or SSN

EXHIBIT I

EXHIBIT I - INDIVIDUALS/ENTITIES WHO FILED OBJECTIONS TO THE SETTLEMENT

DONALD HODGE
KENNETH J. RIES
STEVEN DAVID BENTLEY

EXHIBIT J

Walgreens Savings Club

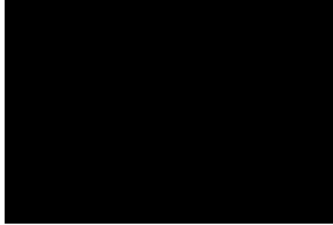
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885378095



APR 08 2025

Steven David Bentley



In re Walgreens Savings Club Litigation

Settlement Administrator, EXCLUSIONS

c/o A.B. Data, Ltd.

P.O. Box 173001

Milwaukee, WI 53217

Date: 18/03/2025

To Whom It May Concern,

I am writing to formally request that I, Steven David Bentley, be excluded from the Settlement Class in the matter of Russo v. Walgreen Co., No. 1:17-cv-02246 (N.D. Ill.). I confirm that I purchased and paid for one or more prescription drugs from Walgreens using insurance during the Settlement Class Period (January 1, 2007 through November 18, 2024).

Please note that this exclusion request is made on my behalf as an individual. My company, Streshi Group Inc. (EIN: [REDACTED]), does not wish to be excluded and will be filing an objection to the settlement under separate correspondence.

This request for exclusion is personal and should not be applied to any corporate or organisational entities associated with me.

Sincerely,

Steven David Bentley

Social Security Number: [REDACTED]

Signature: _____



MR. STEVEN BENTLEY
STRESHI GROUP INC

027806 4 108 245 *****AUTO**ALL FOR AADC 530
IN RE WALGREENS SAVINGS CLUB LITIGATION
Settlement Administrator, Exclusions C/O
A.B. Data Ltd. PO Box 173001
Milwaukee WI 53217-8012



027806



FIRST-CLASS MAIL
PRESORTED
U.S. POSTAGE
PAID
PERMIT NO. 634
ZIP CODE 94120

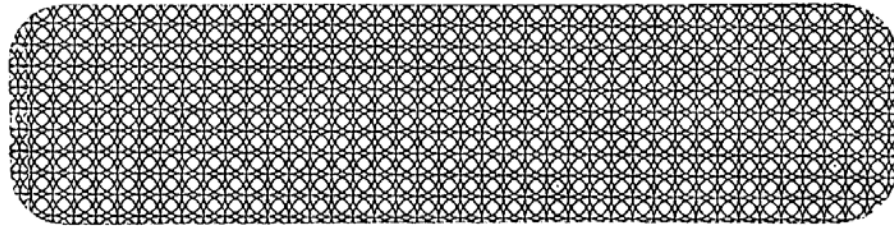
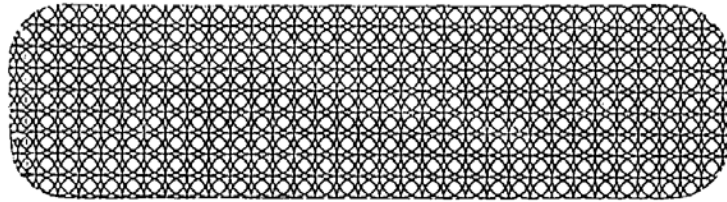


EXHIBIT K

[REDACTED]

From: Eric Miller
Sent: Tuesday, July 15, 2025 4:19 PM
To: [REDACTED]
Cc: Art Shingler
Subject: Russo, et al. v. Walgreen Co., No. 1:17-cv-02246

Good afternoon,

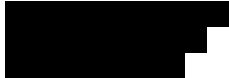
Thank you for your time this afternoon to discuss your submission of both an opt out and an objection. Based on our call today, you stated that you intend to withdraw your objection and instead confirm that you are opting out of the Settlement to protect your right to be part of any lawsuit (other than this lawsuit) against Walgreens relating to the legal claims against Walgreens in this case.

Please confirm.

Thank you



Eric Miller | Senior Vice President | Case Management
A.B. Data, Ltd. | Class Action Administration



5080 PGA Blvd., Suite 209 | Palm Beach Gardens, FL 33418
ABDataClassAction.com



EXHIBIT L

