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6 Class Counsel

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

10 GORDON NOBORU YAMAGATA and
11 STAMATIS F. PELARDIS, individually and
12 on behalf of all others similarly situated,

12 Plaintiffs,

13 v.

14 RECKITT BENCKISER LLC,

15 Defendant.

Case No. 3:17-cv-03529-VC

**DECLARATION OF TIMOTHY G. BLOOD
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

CLASS ACTION

Hrg Date: October 28, 2021
Time: 2:00 p.m.

District Judge Vince Chhabria
Courtroom 4, 17th Floor

Complaint Filed: June 19, 2017

JURY TRIAL DEMANDED

BLOOD HURST & O' REARDON, LLP

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BLOOD HURST & O' REARDON, LLP

1 I, TIMOTHY G. BLOOD, declare:

2 1. I am the managing partner of the law firm Blood Hurst & O'Reardon, LLP and an
3 attorney duly licensed to practice before the courts of the State of California and this Court. I am
4 court-appointed Class Counsel pursuant to Federal Rule of Civil Procedure 23(g) in the above-
5 entitled matter and in *Carrigan v. Reckitt Benckiser LLC*, pending in the United States District Court
6 for the Northern District of Illinois. I have personal knowledge of the matters stated in this
7 declaration except those stated on information and belief, and as to those, I believe them to be true.
8 If called upon, I could and would competently testify to them.

9 2. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class
10 Action Settlement.

11 3. Rather than repeat the details here again, I incorporate by reference the discussion of
12 this lengthy litigation from my prior declarations in support of Plaintiffs' motion for preliminary
13 approval (No. 221-1) and in support of Plaintiffs' Award of Attorneys' Fees, Reimbursement of
14 Expenses, and Service Awards for Class Representatives (ECF No. 230-1). The litigation consisted
15 of two separate class actions in two different districts, has lasted over four years, involved discovery
16 motions, class certification in two courts, a petition for permissive appeal, summary judgment, 30
17 depositions, over 20 third party subpoenas, more than 303,000 pages of documents (exceeding 116
18 GB), reports and declarations from 15 designated experts, and many days of mediations with three
19 different neutrals at various stages throughout the litigation.

20 4. As of September 23, 2021, I am aware of four potential objections, and I am informed
21 by the Settlement Administrator there are 79 opt-outs. The opt-out and objection deadline is October
22 14, 2021.

23 5. I am informed by the Settlement Administrator that as of September 22, 2021,
24 292,012 claims have been received for a total of 1,730,672 bottles of Move Free Advanced. The
25 claims have not yet been reviewed to determine validity. I have also been informed by the Settlement
26 Administrator that given the current number of claims filed and the anticipated future claims rate,
27 claimants will receive full refunds of \$22 per purchase and likely an amount slightly more than the
28 full amount. These claims are expected to exhaust the Common Fund pursuant to the payment terms

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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 23, 2021.

s/ Timothy G. Blood

TIMOTHY G. BLOOD

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