

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	
NIZAR S. NAYANI, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 1:22-cv-06833-JSR
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	SUPPLEMENTAL DECLARATION OF
	:	ROCHELLE J. TEICHMILLER REGARDING:
LIFESTANCE HEALTH GROUP, INC.,	:	(A) MAILING OF THE NOTICE AND PROOF
MICHAEL K. LESTER, J. MICHAEL BRUFF,	:	OF CLAIM; AND (B) REPORT ON
ROBERT BESSLER, DARREN BLACK,	:	REQUESTS FOR EXCLUSION AND
JEFFREY CRISAN, WILLIAM MILLER,	:	OBJECTIONS
JEFFREY RHODES, ERIC SHUEY,	:	
KATHERINE WOOD, MORGAN STANLEY &	:	
CO. LLC, GOLDMAN SACHS & CO. LLC, J.P.	:	
MORGAN SECURITIES LLC, JEFFERIES	:	
LLC, TPG CAPITAL BD, LLC, UBS	:	
SECURITIES LLC, and WILLIAM BLAIR &	:	
COMPANY, L.L.C.,	:	
	:	
Defendants.	:	
	X	

I, Rochelle J. Teichmiller, declare as follows:

1. I am a Project Manager of A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. Pursuant to the Court's October 25, 2023, Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement (the "Notice Order") (ECF 86), A.B. Data was authorized to act as the Claims Administrator in connection with the Settlement in the above-captioned action (the "Action").¹ I am over 21 years of age and am not a party to this Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I submit this Declaration to supplement my Declaration Regarding: (A) Mailing of the Notice and Proof of Claim; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections (the "Initial Mailing Declaration"), dated December 18, 2023, which was previously filed with the Court (ECF 92-2).

UPDATE ON MAILING OF THE NOTICE AND PROOF OF CLAIM

3. As more fully stated in my Initial Mailing Declaration, as of December 18, 2023, A.B. Data had mailed a total of 14,542 copies of the Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses (the "Notice") and the Proof of Claim and Release Form ("Claim Form" and, collectively with the Notice, the "Claims Packet") to potential Class Members and their nominees.

4. Since the Initial Mailing Declaration was executed, and as of the date of this Declaration, A.B. Data has mailed 2,903 additional Claims Packets.

5. Included in this total was a request received on January 9, 2024, from Broadridge Financial Solutions ("Broadridge") to mail Claims Packets to a client list containing 1,535 potential Class Members.

¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation of Settlement (the "Stipulation"). ECF 84-1.

6. As the Broadridge request was presented after the January 3, 2024 deadline to submit an objection to the Settlement or request exclusion, and just prior to the Claim filing deadline of January 17, 2024, A.B. Data, in conjunction with Lead Counsel, included an advisory letter to all potential Class Members in the Broadridge mailing. The letter explained, among other things, that although the Claims Packet was received after the Claim filing deadline, A.B. Data is continuing to accept and process claims which Lead Counsel will recommend for approval, provided they do not materially delay distribution of the Net Settlement Fund. On January 12, 2024, A.B. Data promptly mailed Claims Packets directly to these 1,535 potential Class Members.

7. Therefore, as of the date of this Declaration, an aggregate of 17,445 Claims Packets have been mailed to potential Class Members and their nominees. A.B. Data has re-mailed a total of 559 Claims Packets to persons whose original mailings were returned by the U.S. Postal Service (“USPS”) and for whom updated addresses were provided to A.B. Data by the USPS, which is included in the aggregate.

UPDATE ON TELEPHONE HOTLINE

8. On or about November 15, 2023, a case-specific toll-free phone number, 877-884-3360, was established with an Interactive Voice Response system and live operators. An automated attendant answers all calls initially and presents callers with a series of choices to respond to basic questions. If callers need further help, they have the option to be transferred to an operator during business hours. As of the date of this Declaration, A.B. Data has received 35 telephone calls. A.B. Data has promptly responded to, and will continue to promptly respond to, all inquiries to the toll-free number.

UPDATE ON SETTLEMENT WEBSITE

9. A.B. Data has also established a case-specific website, www.LifeStanceSecuritiesSettlement.com, which provides general information regarding the case and its current status; downloadable copies of the Notice, Claim Form, and other court documents, including the Stipulation and Notice Order; and online claim submission capability. The settlement website is

accessible 24 hours a day, 7 days a week. As of the date of this Declaration, the settlement website has been visited at least 1,339 times.

UPDATE ON REQUESTS FOR EXCLUSION AND OBJECTIONS

10. The Notice informed potential Class Members that written requests for exclusion are to be mailed to *LifeStance Securities Settlement*, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217 such that they are received no later than January 3, 2024. A.B. Data has been monitoring all mail delivered to the post office box. As of the date of this Declaration, A.B. Data has not received any requests for exclusion. However, Lead Counsel was presented with a request for exclusion which was forwarded to A.B. Data for processing. A copy of the exclusion request and summary is hereto attached as Exhibit A.

11. According to the Notice, Class Members seeking to object to the Settlement or any of its terms, the proposed Plan of Allocation of the Net Settlement Fund, and/or Lead Counsel's Fee and Expense Application are required to submit their objection in writing such that the request is received by the Parties and filed with the Court no later than January 3, 2024. As of the date of this Declaration, A.B. Data has not received any misdirected objections.

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

Executed this 12th day of January 2024.



Rochelle J. Teichmiller

EXCLUSION 1

DEC 23

Anthony Louis Caligiuri III

page
1
of
1



RECEIVED DEC 15 2023

Notes

Dear Sir/ or Ma'am,

There is a conflict of interest on the class "Civil Action No. 1:22-cv-06833-JSR" which will result in legal action against all class counsel members if appropriate action is not taken.

I am both a member of the class and a listed defendant. I need assistance ensuring that I am fully excluded from the list of class members and all objections noted, to ensure no need for future litigation.

I await your timely response. Thank you,

Anthony Louis Caligiuri III @9DEC23
Anthony Louis Caligiuri III

Anthony Louis Caligiuri III

SANTA BARBARA CA 931

13 DEC 2023 PM 1 L



G.W.

Robbins Geller Rudman & Dowd LLP
Ellen Gusikoff Stewart
655 West Broadway, Suite 1900
San Diego, CA 92101

LEGAL

92101-849875



K