

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE OPANA ER ANTITRUST LITIGATION	MDL No. 2580
THIS DOCUMENT RELATES TO: Direct Purchaser Action	Lead Case No. 14-cv-10150 Hon. Harry D. Leinenweber

**DECLARATION OF TINA CHIANGO OF RG/2 CLAIMS ADMINISTRATION IN
SUPPORT OF MOTION FOR DISTRIBUTION FROM THE NET SETTLEMENT FUND**

I, Tina Chiango, declare and state as follows under penalties of perjury:

1. I have personal knowledge of the matters set forth herein. I am a Project Manager at the RG/2 Claims Administration (“RG/2”). RG/2 was retained and approved by the Court to provide notice and claims administration services in this matter. RG/2 is an experienced national class action notice provider and claims administrator with experience in administering class action settlements. RG/2’s services include settlement fund escrow and reporting, class member data management, legal notification, call center support, and claims administration. I previously submitted a declaration in support of Direct Purchaser Plaintiffs’ motion for an Order authorizing the distribution from the Net Settlement Fund (ECF No. 1096-1).

2. I make this declaration in support of Direct Purchaser Plaintiffs’ second motion for an Order authorizing the distribution from the Net Settlement Fund (including accrued interest).

3. On June 8, 2023, the Court entered the Order Approving Direct Purchaser Plaintiffs’ Motion for Distribution of Net Settlement Fund (“First Distribution Order”) [ECF No. 1098], approving the administrative determinations of RG/2 concerning the Claims submitted in

this case and directing RG/2 to distribute to each of the 34 Claimants whose Claim Form has been accepted by RG/2 and which are listed in Exhibit B to my previous declaration (the “Final RG/2 Report”¹) [ECF No. 1096-1], its *pro rata* percentage of the then-balance of Net Settlement Fund.

4. In accordance with the First Distribution Order and using the *pro rata* shares set forth in Exhibit B to the Final RG/2 Report [ECF No. 1096-1] on June 15, 2023, RG/2 caused wires or checks to be sent to each of the 34 Claimants listed in Exhibit B to the Final RG/2 Report [ECF No. 1096-1]. All 34 wires and checks have cleared indicating receipt of payment.

5. RG/2 has been previously paid \$10,747 in professional fees and expenses for the claims administration, an initial distribution and filing necessary tax returns. RG/2 estimates it will incur an additional \$4,490 in fees and expenses necessary to complete the final distribution of funds, file the necessary tax returns, and respond to Claimant inquiries concerning the final distribution to Claimants.

6. RG/2 estimates that the 2023 tax liability for the Settlement Fund to be \$450,000 based on interest earned on the Net Settlement Fund in 2023, which is less than the \$476,000 previously withheld for 2023 estimated taxes. *See* ECF No. 1098, ¶5.

7. RG/2 estimates that the 2024 tax liability for the Settlement Fund to be no more than \$55,500 based on interest earned or to be earned on the Net Settlement Fund in 2024 and recommends that that amount be withheld from the distribution to cover any such liability.

8. In total, RG/2 recommends withholding a total of no more than \$505,500 for estimated 2023 and 2024 taxes.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of January 2024 at Philadelphia, PA.

¹ A copy of Exhibit B to the Final RG/2 Report is attached hereto as Exhibit B. Note, there is no Exhibit A to this Declaration.



Tina Chiango