

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re FIRSTENERGY CORP. SECURITIES )	No. 2:20-cv-03785-ALM-KAJ
LITIGATION )	
_____ )	<u>CLASS ACTION</u>
This Document Relates To: )	Judge Algenon L. Marbley
ALL ACTIONS. )	Magistrate Judge Kimberly A. Jolson
_____ )	

PLAINTIFFS' ACCOUNTING OF DISCOVERY

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Pursuant to the May 16, 2024 Order By Special Master, Lead Plaintiff Los Angeles County Employees Retirement Association (“Lead Plaintiff” or “LACERA”), and plaintiffs Amalgamated Bank, as Trustee for the LongView LargeCap 500 Index Fund, LongView Quantitative LargeCap Fund, LongView Broad Market 3000 Index Fund, LongView LargeCap 500 Index Fund VEBA, LV LargeCap 1000 Value Index Fund, LongView Quantitative MidCap Fund, LongView Quant LargeCap Equity VEBA Fund and LongView Core Plus Fixed Income Fund (“Amalgamated Bank”), City of Irving Supplemental Benefit Plan, and Wisconsin Laborers’ Pension Fund (collectively, “Plaintiffs”) submit the following accounting of their completed discovery, as well as a non-binding accounting of their anticipated discovery.

As detailed below, to date, the parties have conducted depositions of 32 individuals and entities, including fact witnesses, expert witnesses, and Rule 30(b)(6) witnesses. Plaintiffs anticipate 51 additional fact depositions (including those previously scheduled by Defendants), as well as 8 depositions that will require a maximum of 2 hours each to revisit subject areas FirstEnergy foreclosed prior to the Court’s May 6, 2024 Order & Opinion (ECF 653). As for written discovery, Plaintiffs have served over two-dozen sets of Requests for Production (“RFPs”); 122 third-party document subpoenas; two sets of Requests for Admissions (“RFAs”); and one set of interrogatories. Plaintiffs have received over three million pages of documents and expect to receive significant productions based on the Court’s January 11, 2024 (ECF 618), February 13, 2024 (ECF 628), and May 6, 2024 (ECF 653) Orders & Opinions. Plaintiffs anticipate serving additional written discovery requests, including third-party document subpoenas.

**I. DEPOSITIONS****A. Completed Depositions<sup>1</sup>**

<b>NOTICING PARTY</b>	<b>PERSON/ENTITY</b>
Plaintiffs	Defendant Charles E. Jones
Plaintiffs	Defendant Dennis M. Chack
Plaintiffs/Defendants	Defendant FirstEnergy 30(b)(6) (Tracy Ashton & Joseph Storsin)
Plaintiffs	Defendant George M. Smart
Plaintiffs/Defendants	Defendant James F. Pearson*
Defendants	Defendant Jason J. Lisowski*
Plaintiffs	Defendant Jerry Sue Thornton
Plaintiffs	Defendant Julia L. Johnson*
Plaintiffs	Defendant Michael J. Dowling
Plaintiffs	Defendant Paul T. Addison*
Plaintiffs	Defendant Sandra Pianalto*
Plaintiffs/Defendants	Defendant Steven E. Strah*
Plaintiffs	Defendant Thomas N. Mitchell*
Defendants	Lead Plaintiff LACERA 30(b)(6) (Esmeralda del Bosque)
Defendants	Plaintiff Amalgamated Bank 30(b)(6) (Eleanor Innes)
Defendants	Plaintiff City of Irving Supplemental Benefit Plan 30(b)(6) (Brad Duff)
Defendants	Plaintiff Wisconsin Laborers 30(b)(6) (John Schmitt)
Defendants	Third-Party Asim Haque
Defendants	Third-Party David Pinter
Plaintiffs	Third-Party Defendants' Expert (Dr. Jennifer Marietta-Westberg)
Defendants	Third-Party Eileen Mikkelsen
Defendants	Third-Party Irene Prezelj*

<sup>1</sup> As indicated by asterisks below, 8 depositions were completed subject to the resolution of Defendant FirstEnergy Corp.'s ("FirstEnergy") instructions to witnesses not to answer certain questions. Pursuant to the Court's May 6, 2024 order, each deposition will be re-opened for up to 2 hours to complete the questioning FirstEnergy prevented. Order by Special Master on Motion to Compel, ECF 571 at PageID 12387; *see also* Order & Opinion, ECF 653 at PageID 14272-74. "Defendants" refers to: (i) FirstEnergy; (ii) Charles E. Jones, James F. Pearson, Steven E. Strah, K. Jon Taylor, Michael J. Dowling, Dennis M. Chack, Robert Reffner, Leila L. Vespoli; John Judge; Donald R. Schneider, and Jason J. Lisowski; (iii) George M. Smart, Paul T. Addison, Michael J. Anderson, Steven J. Demetriou, Julia L. Johnson, Donald T. Misheff, Thomas N. Mitchell, James F. O'Neil III, Christopher D. Pappas, Sandra Pianalto, Luis A. Reyes, Jerry Sue Thornton, and Leslie M. Turner (collectively, the "Director Defendants"); and (iv) Barclays Capital, Inc., BofA Securities, Inc., Citigroup Global Markets, Inc., J.P. Morgan Securities, LLC, Morgan Stanley & Co. LLC, Mizuho Securities USA LLC, PNC Capital Markets LLC, RBC Capital Markets, LLC, Santander Investment Securities Inc., Scotia Capital (USA) Inc., SMBC Nikko Securities America, Inc., CIBC World Markets Corp., KeyBanc Capital Markets, Inc., TD Securities (USA) LLC, U.S. Bancorp Investments, Inc., and MUFG Securities Americas Inc. (collectively, the "Underwriter Defendants").

<b>NOTICING PARTY</b>	<b>PERSON/ENTITY</b>
Defendants	Third-Party Plaintiffs' Expert (Cynthia Jones)
Defendants	Third-Party Plaintiffs' Expert (Dr. Scott Dalrymple)
Plaintiffs	Underwriter Defendant Barclays Capital Inc. 30(b)(6) (Rob Stowe)
Plaintiffs	Underwriter Defendant BofA Securities, Inc. 30(b)(6) (Julien Dumolin-Smith & David Mikula)
Plaintiffs	Underwriter Defendant Citigroup Global Markets, Inc. 30(b)(6) (Brian Bednarski)
Plaintiffs	Underwriter Defendant J.P. Morgan Securities, LLC 30(b)(6) (Charles Wortman & Jeremy Tonet)
Plaintiffs	Underwriter Defendant KeyBanc Capital Markets Inc. 30(b)(6) (Ryan Pirnat)
Plaintiffs	Underwriter Defendant Mizuho Securities USA LLC 30(b)(6) (Michael Donohue)
Plaintiffs	Underwriter Defendant RBC Capital Markets, LLC 30(b)(6) (Anthony Ianno)
Plaintiffs	Underwriter Defendant Scotia Capital 30(b)(6) (Michael Ravanese & Andrew Weisel)

**B. Previously Noticed/Scheduled Depositions Plaintiffs Expect to Be Re-Scheduled**

**1. Parties**

<b>NOTICING PARTY</b>	<b>PERSON/ENTITY</b>
Plaintiffs	Defendant Christopher D. Pappas
Plaintiffs	Defendant Donald R. Schneider
Plaintiffs	Defendant Donald T. Misheff
Plaintiffs	Defendant James F. O'Neil III
Plaintiffs	Defendant John Judge
Plaintiffs	Defendant K. Jon Taylor
Plaintiffs	Defendant Leila L. Vespoli
Plaintiffs	Defendant Leslie M. Turner
Plaintiffs	Defendant Luis A. Reyes
Plaintiffs	Defendant Michael J. Anderson
Plaintiffs	Defendant Robert Reffner
Plaintiffs	Defendant Steven J. Demetriou
Plaintiffs	Underwriter Defendant CIBC World Markets Corp. 30(b)(6)
Plaintiffs	Underwriter Defendant MUFG Securities Americas Inc. 30(b)(6)
Plaintiffs	Underwriter Defendant PNC Capital Markets LLC 30(b)(6)
Plaintiffs	Underwriter Defendant Santander Investment Securities Inc. 30(b)(6)
Plaintiffs	Underwriter Defendant SMBC Nikko Securities America, Inc. 30(b)(6)
Plaintiffs	Underwriter Defendant TD Securities (USA) LLC 30(b)(6)

<b>NOTICING PARTY</b>	<b>PERSON/ENTITY</b>
Plaintiffs	Underwriter Defendant U.S. Bancorp Investments, Inc. 30(b)(6)

## 2. Third-Parties

<b>NOTICING PARTY</b>	<b>PERSON/ENTITY</b>
Plaintiffs	Third-Party Anna Lippincott
Plaintiffs	Third-Party Ballard Spahr LLP
Plaintiffs	Third-Party Bradley Bingaman
Plaintiffs	Third-Party Brakey Energy, Inc.
Plaintiffs	Third-Party David Eric Lycan
Plaintiffs	Third-Party Debbie Ryan
Plaintiffs	Third-Party Ebony Yeboah-Amankwah
Plaintiffs/Defendants	Third-Party Generation Now
Plaintiffs	Third-Party James Nevels
Plaintiffs	Third-Party Joel Bailey
Plaintiffs	Third-Party Lt. Gov. Jon Husted
Plaintiffs	Third-Party Marathon Petroleum Company
Plaintiffs	Third-Party Mark Hayden
Defendants	Third-Party Megan Fitzmartin
Defendants	Third-Party Michael VanBuren
Plaintiffs/Defendants	Third-Party Partners for Progress
Plaintiffs	Third-Party PricewaterhouseCoopers
Defendants	Third-Party Santino Fanelli
Defendants	Third-Party Steven Staub
Plaintiffs	Third-Party Sustainability Funding Alliance of Ohio, Inc.

## C. Depositions Plaintiffs Intend to Schedule

<b>PERSON/ENTITY</b>
Defendant Morgan Stanley & Co. LLC
Third-Party Carlo LoParo
Third-Party Chuck Moore
Third-Party Daniel J. McCarthy
Third-Party Gov. Mike DeWine
Third-Party John Kiani
Third-Party Laurel Dawson
Third-Party Lt. Gov. Jon Husted
Third-Party Michael Kizer (GLC Advisors & Company)
Third-Party Paul M. Sotkiewicz, Ph.D. (American Petroleum Institute)
Third-Party Peter Bradford
Third-Party Rex Elsass

## **II. WRITTEN DISCOVERY**

### **A. RFPs**

RFPs Served on Defendants: Plaintiffs have served all Defendants with RFPs, including 4 sets to Defendant FirstEnergy; 3 sets to Underwriter Defendants; and 2 sets to Defendants Charles E. Jones, Jason J. Lisowski, Dennis M. Chack, Michael J. Dowling, John Judge, James F. Pearson, Robert Reffner, Donald R. Schneider, Steven E. Strah, K. Jon Taylor, Leila L. Vespoli, and Director Defendants.

Responses to Defendants' RFP: Plaintiffs have responded to 1 set of RFPs from Defendants FirstEnergy and James F. Pearson.

Plaintiffs intend to serve additional RFPs on all Defendants, but cannot estimate how many.

### **B. RFAs**

RFAs Served on Defendants: Plaintiffs have served 1 set of RFAs to Defendants Charles E. Jones and Michael J. Dowling.

Plaintiffs intend to serve additional RFAs on all Defendants, but cannot estimate how many.

### **C. Interrogatories**

Interrogatories Served on Defendants: Plaintiffs have served 1 set of interrogatories to Defendant FirstEnergy (Nos. 1-4).

Responses to Defendants' Interrogatories: Plaintiffs have responded to 1 set of interrogatories from Defendants FirstEnergy (Nos. 1-11) and James F. Pearson (Nos. 1-15).

Plaintiffs intend to serve additional interrogatories on all Defendants, but cannot estimate how many.

**D. Document Subpoenas**

Document subpoenas were previously issued to third-parties Energy Harbor, Samuel C. Randazzo, and Sustainability Funding Alliance of Ohio, Inc. for which document production has yet to be complete due to the discovery stay.

**1. Document Subpoenas Issued by Plaintiffs**

<b>PERSON/ENTITY</b>
Third-Party 17 Consulting Group
Third-Party 614 Solutions LLC
Third-Party Abbott Laboratories
Third-Party Air Liquide Industrial U.S. LP
Third-Party Airgas, Inc.
Third-Party American Electric Power Company, Inc.
Third-Party Anheuser-Busch Companies, Inc.
Third-Party Anna Lippincott
Third-Party Anna Lippincott & Associates
Third-Party ASHTA Chemicals, Inc.
Third-Party Ballard Spahr LLP
Third-Party Bath & Body Works Logistics Services, LLC f/k/a Mast Global Logistics
Third-Party Brad Bingaman
Third-Party Brakey Energy, Inc.
Third-Party Brooke Bodney
Third-Party CertainTeed Holding Corporation
Third-Party Clow Water Systems Corporation
Third-Party Coalition for Growth & Opportunity
Third-Party Columbus Steel Castings Company
Third-Party Constant Content Co.
Third-Party Cove Key Management LP
Third-Party Custom Glass Solutions Service
Third-Party David Eric Lycan
Third-Party Debbie Ryan
Third-Party Deutsche Bank Securities Inc.
Third-Party DPH Holdings Corporation f/k/a Delphi Corporation
Third-Party Ebony Yeboah-Amankwah
Third-Party Eileen Mikkelsen
Third-Party Empowering Ohio's Economy
Third-Party Energizer Battery Manufacturing Inc.
Third-Party Energy Harbor Corp.
Third-Party Eramet Marietta Inc.
Third-Party Evercore Group L.L.C.
Third-Party FieldWorks, LLC
Third-Party Financial Industry Regulatory Authority, Inc.
Third-Party Fitch Ratings, Inc.

<b>PERSON/ENTITY</b>
Third-Party Former Defendant Ty R. Pine
Third-Party Generation Now
Third-Party Glatfelter Corporation
Third-Party Glen-Gery Corporation
Third-Party Glenrock Associates LLC
Third-Party Globe Metallurgical, Inc.
Third-Party Goldman Sachs & Co. LLC
Third-Party Gov. Mike DeWine
Third-Party Grant Street Consultants
Third-Party Green Century Capital Management, Inc.
Third-Party Growth & Opportunity PAC, Inc.
Third-Party Guggenheim Securities, LLC
Third-Party Hardworking Ohioans
Third-Party Industrial Energy Users Ohio (IEU-Ohio)
Third-Party Ineos Pigments USA, Inc. f/k/a Cristal USA Inc.
Third-Party James E. Nevels
Third-Party Jason Rafeld
Third-Party Jefferies Group LLC
Third-Party Jeffrey Longstreth
Third-Party Joel Bailey
Third-Party John Kiani
Third-Party Josh Rubin
Third-Party JPL & Associates, LLC
Third-Party JPMorgan Chase Bank, National Association
Third-Party Juan Cespedes
Third-Party Justin Biltz
Third-Party JVA Campaigns, LLC
Third-Party Kraton Polymers U.S. LLC
Third-Party Lincoln Electric Automation, Inc. d/b/a Wayne Trail Technologies, Inc.
Third-Party LoParo Public Relations, LLC
Third-Party Lt. Gov. John Husted
Third-Party Marathon Petroleum Company
Third-Party Mark Hayden
Third-Party Matthew Borges
Third-Party MC Fitzmartin, LLC
Third-Party McKenzie Davis
Third-Party McNeas Wallace & Nurick LLC
Third-Party McWane, Inc. f/k/a McWane Ductile
Third-Party Megan Fitzmartin
Third-Party Michael Pircio
Third-Party Michael VanBuren
Third-Party Middlefield Industrial & Commercial Association
Third-Party Momentive Performance Materials, Inc.
Third-Party Mondelez International, Inc.
Third-Party Moody's Investors Service, Inc.



<b>PERSON/ENTITY</b>
Third-Party Morningstar, Inc.
Third-Party Ohioans for Energy Security
Third-Party Oldapco, Inc. f/k/a Appvion, Inc.
Third-Party Partners for Progress
Third-Party Paulo Products Company
Third-Party Plastipak Packaging Inc.
Third-Party Price Target Research Inc.
Third-Party PricewaterhouseCoopers
Third-Party Saint Gobain Corporation
Third-Party Saint Gobain Norpro Corporation
Third-Party Saint-Gobain Ceramics & Plastics, Inc. d/b/a Saint Gobain Crystals
Third-Party Samuel C. Randazzo
Third-Party Scott Davis
Third-Party Standard & Poor's Financial Services, LLC
Third-Party Strategic Media Placement, Inc.
Third-Party Strategies for Results, Inc.
Third-Party Sustainability Funding Alliance of Ohio, Inc.
Third-Party Synovus Bank
Third-Party Tate & Lyle Americas, Inc.
Third-Party Terry P. Dershaw
Third-Party The Batchelder Co.
Third-Party The Lincoln Electric Company
Third-Party The Nathan Cummings Foundation, Inc.
Third-Party The Oxley Group
Third-Party The Public Utilities Commission of Ohio
Third-Party The Strategy Group Company, LLC
Third-Party The Success Group, Ltd.
Third-Party Thomas T. George
Third-Party TimkenSteel Corporation
Third-Party UBS Securities LLC
Third-Party United States Environmental Protection Agency
Third-Party United States Nuclear Regulatory Commission
Third-Party United States Securities and Exchange Commission
Third-Party University of Akron
Third-Party USG Corporation
Third-Party Utility Scale Solar Energy Coalition of Ohio
Third-Party Vallourec Star, LP
Third-Party Voter to Voter, LLC
Third-Party Wells Fargo Securities, LLC
Third-Party Wolfe Research, LLC
Third-Party Zack's Investment Research, Inc.

## 2. Document Subpoenas Plaintiffs Expect to Issue

<b>PERSON/ENTITY</b>
Third-Party Daniel J. McCarthy
Third-Party PricewaterhouseCoopers

### III. EXPERT DISCOVERY

Plaintiffs presently intend to submit expert reports from 7 different experts, only 2 of whom will be offering opinions directly related to damages.

### IV. DOCUMENT PRODUCTIONS

#### A. Defendant Productions

Each Defendant to date has produced the following pages of documents:

<b>PRODUCING PARTY</b>	<b>DOCUMENTS</b>	<b>PAGE COUNT</b>
Defendant Charles E. Jones	938	4,499
Defendant Dennis M. Chack	454	4,710
Defendant Donald R. Schneider	514	2,699
Defendant Donald T. Misheff	1	1
Defendant FirstEnergy Corp.	448,618	1,195,189
Defendant George M. Smart	2	4
Defendant James F. Pearson	1,756	2,624
Defendant Jason J. Lisowski	2	226
Defendant John Judge	1	156
Defendant K. Jon Taylor	158	577
Defendant Leila Vespoli	309	1,046
Defendant Michael J. Dowling	67	885
Defendant Robert Reffner	88	879
Defendant Steven E. Strah	116	408
Former Defendant Ty R. Pine	25	178
Underwriter Defendant Barclays Capital, Inc	2,028	14,910
Underwriter Defendant BofA Securities, Inc.	4,443	29,910
Underwriter Defendant CIBC World Markets Corp.	622	8,677
Underwriter Defendant Citigroup Global Markets, Inc.	854	4,285
Underwriter Defendant J.P. Morgan Securities, LLC	1,222	13,496
Underwriter Defendant KeyBanc Capital Markets, Inc.	611	4,106
Underwriter Defendant Mizuho Securities USA LLC	1,956	21,103
Underwriter Defendant MUFG Securities Americas Inc.	269	5,037

<b>PRODUCING PARTY</b>	<b>DOCUMENTS</b>	<b>PAGE COUNT</b>
Underwriter Defendant Morgan Stanley & Co. LLC	3,972	29,422
Underwriter Defendant PNC Capital Markets LLC	87	1,032
Underwriter Defendant RBC Capital Markets, LLC	645	3,109
Underwriter Defendant Santander Investment Securities Inc.	52	1,265
Underwriter Defendant Scotia Capital (USA) Inc.	1,954	18,856
Underwriter Defendant SMBC Nikko Securities America, Inc.	857	7,240
Underwriter Defendant TD Securities (USA) LLC	291	2,811
Underwriter Defendant US Bancorp Investments, Inc.	337	2,757
<b>TOTAL</b>	<b>473,249</b>	<b>1,382,097</b>

### **B. Plaintiff Productions**

Each Plaintiff to date has produced the following pages of documents:

<b>PRODUCING PARTY</b>	<b>DOCUMENTS</b>	<b>PAGE COUNT</b>
Lead Plaintiff LACERA	187	8,359
Plaintiff Amalgamated Bank	123	71,393
Plaintiff City of Irving Supplemental Benefit Plan	15	463
Plaintiff Wisconsin Laborers' Pension Fund	22	4,690
<b>TOTAL</b>	<b>347</b>	<b>84,905</b>

### **C. Third-Party Productions**

Each Third-Party to date has produced the following pages of documents:

<b>PRODUCING PARTY</b>	<b>DOCUMENTS</b>	<b>PAGE COUNT</b>
Third-Party Abbott Laboratories	4	6
Third-Party Airgas, Inc.	1	2
Third-Party American Electric Power Company, Inc.	213	2,805
Third-Party American Express	57	505
Third-Party Anna Lippincott	389,646	941,352
Third-Party AT&T	7	4,017
Third-Party Ballard Spahr LLP	1,345	12,989
Third-Party Bath & Body Works Logistics Services, LLC	1	41
Third-Party Bradley Bingaman	1	105
Third-Party Brooke Bodney	608	823
Third-Party Carlo LoParo	7,875	44,796

<b>PRODUCING PARTY</b>	<b>DOCUMENTS</b>	<b>PAGE COUNT</b>
Third-Party Charles Schwab	10	90
Third-Party Clearsulting	1,476	7,794
Third-Party Coalition for Growth & Opportunity	651	5,050
Third-Party Daniel J. McCarthy	8	26
Third-Party David Eric Lycan	899	3,662
Third-Party Debbie Ryan	1	10
Third-Party Deutsche Bank Securities Inc.	44	853
Third-Party Ebony Yeboah-Amankwah	154	1,653
Third-Party Energy Harbor Corp.	88,558	481,437
Third-Party FieldWorks, LLC	3,727	4,483
Third-Party Fifth Third	248	440
Third-Party Financial Industry Regulatory Authority, Inc.	12	12
Third-Party Fitch Ratings, Inc.	240	4,735
Third-Party Generation Now	30	61
Third-Party Goldman Sachs & Co. LLC	140	1,788
Third-Party Grant Street Consultants	3,895	19,200
Third-Party Green Century Capital Management, Inc.	93	445
Third-Party Growth & Opportunity PAC, Inc.	2,019	9,551
Third-Party IBEW Local Union 245	1	412
Third-Party Industrial Energy Users Ohio (IEU-Ohio)	18,007	217,846
Third-Party Jason Rafeld	10	19
Third-Party Jefferies Group	327	1,373
Third-Party Jeffrey Longstreth	90	464
Third-Party Joel Bailey	547	1,015
Third-Party JPMorgan Chase Bank, National Association	2,564	16,321
Third-Party JVA Campaigns, LLC	1,036	5,546
Third-Party Local 310	1	103
Third-Party McKenzie Davis	1,367	2,047
Third-Party McNeas Wallace & Nurick LLC	2	7
Third-Party Megan Fitzmartin	30,262	69,599
Third-Party Moody's Investors Service, Inc.	60	1,064
Third-Party Mott, Self & Associates	54	105
Third-Party Partners for Progress	3,087	9,431
Third-Party PriceTarget Research Inc.	118	1,123
Third-Party PricewaterhouseCoopers	1,670	28,138
Third-Party Samuel C. Randazzo	1,812	7,478
Third-Party Scott Davis	42	144
Third-Party Standard & Poor's Financial Services, LLC	618	15,463

<b>PRODUCING PARTY</b>	<b>DOCUMENTS</b>	<b>PAGE COUNT</b>
Third-Party The Batchelder Co.	10,372	235,727
Third-Party The Nathan Cummings Foundation, Inc.	230	591
Third-Party The Public Utilities Commission of Ohio	896	4,758
Third-Party The Strategy Group Company, LLC	27,322	75,430
Third-Party The Success Group, Ltd.	60	312
Third-Party TimkenSteel Corporation	30	204
Third-Party UBS Securities LLC	272	6,756
Third-Party United States Environmental Protection Agency	58	2,473
Third-Party University of Akron	4	96
Third-Party Utility Scale Solar Energy Coalition of Ohio	1	11
Third-Party Verizon Security Assistance Team	1	79
Third-Party Voter to Voter, LLC	1,197	3,857
Third-Party Wells Fargo Securities, LLC	216	2,174
Third-Party Zacks Investment Research, Inc.	519	4,533
<b>TOTAL</b>	<b>604,816</b>	<b>2,263,430</b>

#### **D. Expert Productions**

Each Expert to date has produced the following pages of documents:

<b>PRODUCING PARTY</b>	<b>DOCUMENTS</b>	<b>PAGE COUNT</b>
Defendants' Expert Dr. Jennifer Marietta-Westberg	82	1,202
Plaintiffs' Expert Cynthia Jones	152	18,748
Plaintiffs' Expert Dr. Scott Dalrymple	675	135,581
<b>TOTAL</b>	<b>909</b>	<b>155,531</b>

DATED: May 22, 2024

MURRAY MURPHY MOUL + BASIL LLP  
JOSEPH F. MURRAY, Trial Attorney (0063373)

s/ Joseph F. Murray  
\_\_\_\_\_  
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Class Counsel

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically on May 22, 2024. Notice of this filing will be sent to all electronically registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*/s/ Joseph F. Murray*

\_\_\_\_\_  
Joseph F. Murray (0063373)