

KELLER ROHRBACK L.L.P.
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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

JOEL CLEARY, M.D., individually and
on behalf of all others similarly situated,

Plaintiff,

v.

RETIREMENT PLAN FOR
EMPLOYEES OF NORTHERN
MONTANA HOSPITAL et al.,

Defendants.

Case No. 4:16-cv-00061-BMM

**DECLARATION OF MARY K. MONTGOMERY IN SUPPORT OF
PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF
SETTLEMENT**

Mary K. Montgomery, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I have personal knowledge of the facts I state below, and if I were to be called as a witness, I could and would competently testify about what I have written in this declaration.

2. I am a paralegal in the Seattle, WA office of Plaintiff's counsel, Keller Rohrback L.L.P.


3. I have been responsible for monitoring telephone calls made to the toll-free number provided to Covered Participants¹ in the Notice.

4. To date, there have been twenty (20) such calls as follows:

- 5 were from Covered Participants confirming they had received the Notice and understood they were eligible for a payment;
- 2 were received from Covered Participants who needed to update their name and/or their mailing address with respect to the anticipated payment;
- 10 individuals who had heard about the settlement from a Covered Participant called to request that their status as not in line for a payment be investigated and this was confirmed;
- 2 were from individuals who had heard about the settlement and were asking for investigation as to their status and the results changed from no to a yes and they are to be included in the distribution;
- 1 individual called for information about the settlement she had heard about, but declined the offer for an investigation to confirm her status as not to receive a payment;

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

Executed on November 1, 2018 in Seattle, WA.


MARY K. MONTGOMERY

¹ Unless otherwise stated, capitalized terms have the meaning ascribed to them in the Settlement Stipulation and Order herein. ECF 147.

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2018, a true and correct copy of the foregoing document was filed with the Court utilizing its CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ Gary A. Gotto

Gary A. Gotto