

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

THE HOSPITAL AUTHORITY OF  
METROPOLITAN GOVERNMENT OF  
NASHVILLE AND DAVIDSON  
COUNTY, TENNESSEE, d/b/a  
NASHVILLE GENERAL HOSPITAL and  
AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL  
EMPLOYEES DISTRICT COUNCIL 37  
HEALTH & SECURITY PLAN,

Plaintiffs,

v.

MOMENTA PHARMACEUTICALS,  
INC. and SANDOZ INC.,

Defendants.

Civil Action No. 3:15-cv-01100

**FINAL REPORT AND  
UPDATED DECLARATION  
OF REBECCA A. BLAKE FOR  
RUST CONSULTING, INC.**

Rebecca A. Blake, declares and states as follows:

1. I am a Program Manager for Rust Consulting, Inc. ("Rust"), a firm specializing in class action notice and administration. My business address is 625 Marquette Avenue, Suite 900, Minneapolis, Minnesota 55402-2469. My telephone number is (612) 359-2926. I am over twenty-one years of age and am authorized to make this declaration on behalf of Rust and myself.

2. Rust is a nationally known settlement administration company and has extensive experience in the administration of class action matters, having provided services in class action cases ranging in size from 100 to 100 million class members and involving a wide range of

issues. We have provided notification and/or claims administration services in more than 6,500 matters.

3. Rust has developed a proprietary mailing database to be used to provide notice to TPP Class Members in large pharmaceutical class actions (the “TPP Mailing Database”). When first developed in 2001, the TPP Mailing Database was based on data gathered from public sources, including:

- Pharmacy Benefit Management Institute
- Health Insurance Association of America
- Benefits Sourcebook
- Managed Care Information Centers
- Judy Diamond Associates
- A.M. Best Company
- Association of Managed Care Providers
- Society of Professional Benefit Administrators
- American Association of Health Plans
- Self Insurers Institute of America
- National Association of Insurance Commissioners

4. Through its experience as a court-appointed claims administrator in class action matters involving pharmaceutical products, Rust has updated the TPP Mailing Database with changes of address and has added TPPs and record keepers as they are identified through subsequent settlement communications. Rust’s TPP Mailing Database now includes over 65,000 potential TPP Class Members and entities who represent, advise, or communicate with potential TPP Class Members (including pharmacy benefit managers, attorneys and other authorized agents).

5. Rust has purchased a mailing list of 18,281 contacts from InfoUSA to reach hospitals, medical centers, and healthcare facilities. InfoUSA created the most accurate up-to-

date database of US businesses. This proprietary, copyrighted database contains information on approximately 22.5 million U.S. Businesses. Information in the database is compiled in two phases. First, InfoUSA compiles 4,000+ telephone directories and over 250 new business sources such as Secretaries of State, county courthouses and public record notices. Through these sources and additional processing, InfoUSA can typically gather base level information. Second, InfoUSA calls each business to verify the information and to obtain additional information. The InfoUSA list is probably over-inclusive of the proposed class, as it includes not only hospitals, but other healthcare facilities.

6. On October 30, 2019, Rust mailed the Postcard Notice to the individuals contained in the TPP Mailing Database and the InfoUSA list. A total of 80,872 Postcard Notices were mailed via First-Class Mail.

7. Rust obtained a mailing address of DVT Medications Lawsuit Class Administrator, c/o Rust Consulting Inc. – 6599, P.O. Box 63, Minneapolis, MN 55440-0063 to receive written requests for exclusion and other communications regarding the lawsuit.

8. Rust obtained a toll-free telephone number of (866) 411-6987 for individuals to call with questions regarding the lawsuit. The toll-free telephone number was included on the Postcard Notice.

9. As of this date, there have been 35 calls to the toll-free number.

10. Rust obtained and purchased a website URL [www.DVTMedsLawsuit.com](http://www.DVTMedsLawsuit.com) to host important documents, dates and frequently asked questions regarding the lawsuit. The website URL address was included on the Postcard Notice.

11. As of this date, there have been 10,908 unique visitors to the website.

12. On October 30, 2019, the Summary Notice was published in the USA Today. Further, a nationwide press release was distributed on PR Newswire's US news circuit, as well as an internet advertising campaign with targeted internet banners and impressions disseminated to further notify the Class.

13. As of this date, zero (0) requests for exclusion have been received.

Executed this 8th day of January, 2020 in Minneapolis, MN.

  
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Rebecca A. Blake

## CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of April, 2020, the foregoing document was filed electronically with the U.S. District Court for the Middle District of Tennessee. Notice of this filing was served via the court's electronic filing system on counsel listed below:

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