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Local Counsel for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

BARBARA STROUGO, Individually and on	)	No. 3:20-cv-10100-RK (TJB)
Behalf of All Others Similarly Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
vs.	)	SUPPLEMENTAL DECLARATION OF
	)	ROSS D. MURRAY REGARDING
	)	CONTINUED NOTICE DISSEMINATION
MALLINCKRODT PUBLIC LIMITED	)	AND REQUESTS FOR EXCLUSION
COMPANY, et al.,	)	RECEIVED
	)	
Defendants.	)	
_____	)	

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Verita Global (“Verita”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s December 23, 2024 Order Preliminarily Approving Settlement and Providing for Notice (ECF 155) (the “Notice Order”), Verita was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”).<sup>1</sup> I oversaw the notice services that Verita provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my previously filed declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (ECF 157-5) (the “Initial Mailing Declaration”). The following statements are based on my personal knowledge and information provided to me by other Verita employees, and, if called as a witness, I could and would testify competently thereto.

#### **CONTINUED DISSEMINATION OF NOTICE**

3. As more fully detailed in the Initial Mailing Declaration, as of March 11, 2025, Verita had mailed or emailed a total of 114,436 Postcard Notices and 76 copies of the Notice of Pendency and Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and their nominees. In addition, one institution reported that they anticipated sending Postcard Notices via email to 43,466 potential Class Members. *See* Initial Mailing Declaration, ¶11.

4. Since March 11, 2025, Verita has mailed or emailed an additional 9,042 Postcard Notices and 13 Claim Packages in response to requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were

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<sup>1</sup> Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation of Settlement dated September 18, 2024 (ECF 148-4) (the “Stipulation”), which is available on the website established for the Settlement at [www.MallinckrodtSecuritiesSettlement.com](http://www.MallinckrodtSecuritiesSettlement.com).

identified and re-mailed to those new addresses.<sup>2</sup> Therefore, as of April 3, 2025, Verita has mailed or emailed a total of 123,478 Postcard Notices and 89 Claim Packages to potential Class Members and nominees.

#### **UPDATE ON CALL CENTER SERVICES AND WEBSITE**

5. Verita continues to maintain the toll-free telephone number (1-888-726-1568) to accommodate inquiries about the Settlement from potential Class Members. Verita also monitors the case-dedicated e-mail address, info@MallinckrodtSecuritiesSettlement.com. Verita endeavors to respond timely to each telephone and e-mail inquiry and will continue to respond to Class Member inquiries via the toll-free telephone number and case dedicated e-mail address until the conclusion of the administration.

6. Verita also continues to maintain the website dedicated to the Settlement, www.MallinckrodtSecuritiesSettlement.com (the “Settlement Website”), to assist potential Class Members. Following Lead Counsel’s filing of its briefing in support of the Settlement on March 11, 2025, Verita posted to the Settlement Website copies of the papers in support of Plaintiffs’ Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation and Lead Counsel’s Motion for an Award of Attorneys’ Fees, Expenses, and Awards to Plaintiffs. Verita will continue operating, maintaining and, as appropriate, updating the Settlement Website until the conclusion of the administration of this Settlement.

#### **REQUESTS FOR EXCLUSION RECEIVED**

7. Pursuant to the Notice Order, the Notice informed potential Class Members that written requests for exclusion from the Class were to be sent to Verita, such that they are postmarked or received no later than March 25, 2025. At the time of the Initial Mailing Declaration, Verita reported that it had received one request for exclusion. *See* Initial Mailing Declaration, ¶16 and Ex. E thereto.

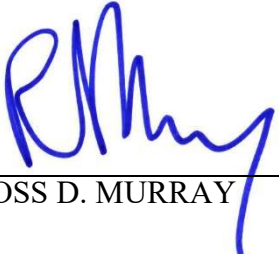
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<sup>2</sup> To date, of the 123,478 mailed Postcard Notices, 3,146 were undeliverable. Updated addresses were located, and an additional 804 Postcard Notices were mailed.

8. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Verita has not received any further requests for exclusion.

9. The Notice requests that objections must be filed with the Court such that they are filed or received on or before March 25, 2025. While Verita was not listed as a recipient of objections, Verita has not received any misdirected objections.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 3rd day of April, 2025, at San Rafael, California.



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ROSS D. MURRAY