

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

PETER GARVEY, individually and on	)	
behalf of a class of similarly situated individuals,	)	
	)	
<i>Plaintiff</i> ,	)	Case No. 1:18-cv-7919
	)	
v.	)	Honorable Jorge L. Alonso
	)	
CITIZENS FOR RAUNER, INC.,	)	Magistrate Judge M. David Weisman
an Illinois corporation; and BRUCE RAUNER,	)	
an individual	)	
	)	
<i>Defendant</i> .	)	
	)	

**PLAINTIFF’S SUPPLEMENT TO UNOPPOSED MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff, Peter Garvey, in supplement to his Unopposed Motion for Final Approval of Class Action Settlement filed August 24, 2021, states as follows:

1. Pursuant to the Court’s May 14, 2021 order in this action preliminarily approving the Parties’ proposed class action settlement [Dkt. 138], Plaintiff timely filed his Unopposed Motion for Final Approval of Class Action Settlement on August 24, 2021 (the “Motion”) [Dkt. 140].
2. Footnote number two in the Motion [at Dkt. 140, Page ID 1488] advised that “The Settlement Administrator, KCC Class Action Services LLC, is still reviewing approximately 7,500 of the claims, but has conclusively determined that another approximately 1,500 claims are valid. The remainder of the claims are duplicates or were filed late. *See infra* at 7. KCC will submit a supplemental affidavit once it has completed its review.”
3. Attached hereto as **Exhibit 1** is the September 3, 2021 *Supplemental Declaration of Jeanne Chernila Re: Notice Procedures* (the “Supplemental Declaration”).

4. The Supplemental Declaration provides updated information concerning the Claim Forms submitted in this action, as well as KCC's estimated total costs of administration.

5. Per paragraph 14 of the Supplemental Declaration, through September 3, 2021 KCC has received 10,032 timely-filed claim forms and 31 late filed claim forms. Of the 10,032 timely claim submissions, 1,582 have been conclusively determined to be valid, 1,319 have been determined to be duplicate submissions, and 7,131 claim submissions have been determined to be deficient.

6. Per paragraph 15 of the Supplemental Declaration, the 7,131 claims that have been determined to be deficient will be provided an opportunity to correct or "cure" their submissions, and once claimants have responded to KCC's inquiries, KCC will review all communications and information and make a final determination for all claim submissions.

7. In addition, per paragraph 18 of the Supplemental Declaration, as of August 27, 2021, KCC estimates that its total cost of administration through conclusion of the settlement to be \$108,942.04.

8. Finally, the Supplemental Declaration provides that through September 3, 2021 KCC has: (a) received no responses to the CAFA Notice Packet; (b) received no requests for exclusion from the Settlement; and (c) received no objections to the Settlement.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order: (1) finding that the Settlement is fair, reasonable, and adequate; (2) granting final approval of the Settlement; (3) approving Plaintiff's request for attorney's fees, expenses, and the incentive award; and (4) granting such further and additional relief as the Court deems just.

Dated: September 4, 2021

Respectfully submitted,

PETER GARVEY individually and on behalf of a  
class of similarly situated individuals

By: /s/ John Sawin  
Plaintiff's Attorney

John Sawin (IL 6227112)  
SAWIN LAW LTD.  
55 West Wacker Drive, Suite 900  
Chicago, Illinois 60601  
312.853.2490  
jsawin@sawinlawyers.com  
*Counsel for Plaintiff and Class Counsel*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on September 4, 2021 I electronically filed the foregoing *Plaintiff's Supplement to Unopposed Motion for Final Approval of Class Action Settlement* with the Clerk of the Court using the CM/ECF system. A copy of said document will be electronically transmitted to all counsel of record.

/s/ John Sawin

**EXHIBIT 1**

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

PETER GARVEY, individually and on behalf of a class of similarly situated individuals,

*Plaintiff,*

v.

CITIZENS FOR RAUNER, INC., an Illinois corporation; and BRUCE RAUNER, an individual,

Defendants.

Case No. 1:18-cv-07919

Honorable Jorge L. Alonso

Magistrate Judge M. David Weisman

**SUPPLEMENTAL DECLARATION OF JEANNE CHERNILA**  
**RE: NOTICE PROCEDURES**

I, JEANNE CHERNILA, hereby aver, pursuant to 28 U.S.C. § 1746, that I am fully competent to make this Declaration, I have personal knowledge of all matters set forth herein unless stated otherwise, and I would testify to all such matters if called as a witness:

**OVERVIEW OF KCC'S RESPONSIBILITIES AS SETTLEMENT ADMINISTRATOR**

1. I am a Case Coordinator with KCC Class Action Services, LLC ("KCC"), located at 1 McGinnis Parkway, Suite 250, San Rafael CA 94903.

2. Pursuant to the Order Preliminarily Approving Class Action Settlement Agreement, Conditionally Certifying Settlement Class, Directing Notice of Proposed Class Settlement, and Setting a Final Approval Hearing (the "Preliminary Approval Order") dated May 14, 2021, the Court appointed KCC as the Class Administrator in connection with the proposed Settlement of

the above-captioned Action.<sup>1</sup>

3. In my role as a Case Coordinator at KCC, I am familiar with all aspects of the administrative services provided in this matter.

4. Subject to the supervision of Class Counsel and Defendant's Counsel, KCC was responsible for implementing the Settlement Agreement's Notice Plan, including but not limited to the following:

- a) Compiling and formatting the Class List;
- b) Effectuating direct notice and publication notice to Settlement Class Members;
- c) Establishing and maintaining a post office box to receive Settlement Class Member correspondence including opt-outs and objections;
- d) Establishing and maintaining a Settlement Website;
- e) Receiving and evaluating all claims submitted.

#### **CAFA NOTIFICATION**

5. In compliance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. Section 1715, KCC compiled a CD-ROM containing the following documents: Notice of Removal; Class Action Complaint and Jury Demand; Summons (State Court action); Citizens for Rauner, Inc.'s Third-Party Complaint (against Victory Phones LLC and The Stratics Group Inc.); First Amended Class Action Complaint and Jury Demand; Citizens for Rauner, Inc.'s First Amended Third-Party Complaint; Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement; Notice of Unopposed Motion; Declaration of John Sawin; [Proposed] Order Preliminarily Approving Class Action Settlement Agreement, Conditionally Certifying Settlement Class,

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Class Action Settlement Agreement and Release], dated May 6, 2021 (the "Settlement Agreement") and/or the Preliminary Approval Order.

Directing Notice of Proposed Class Settlement, and Setting a Final Approval Hearing; Mail Notice, Claim Form, Publication; Class Action Settlement Agreement; Order (dismissing third-party defendants Victory Phones, LLC, and Stratics Group, Inc.); and [Proposed] Order Granting Final Approval of Class Action Settlement and Final Judgment, which accompanied a cover letter (collectively, the “CAFA Notice Packet”). A copy of the cover letter is attached hereto as Exhibit A.

6. On May 14, 2021, KCC caused fifty-nine (59) CAFA Notice Packets to be mailed via Priority Mail from the U.S. Post Office in Memphis, Tennessee to the parties listed on Exhibit B, i.e., the U.S. Attorney General, the Attorneys General of each of the 50 states in which Settlement Class Members reside and the District of Columbia, the Attorneys General of the 5 U.S. voting Territories, as well as parties of interest to this Action.

7. As of the date of this Declaration, KCC has received no responses to the CAFA Notice Packet from any of the recipients identified in paragraph 3 above.

#### **CLASS LIST**

8. On May 11, 2021, KCC received from counsel for defendant a list of 140,740 transaction records. These records included telephone numbers, message dates, and message identification tags. On May 14, 2021, KCC removed duplicate telephone number records, and processed the 38,008 unique telephone numbers through Pacific East reverse phone number lookup service to obtain names and addresses on file with the United States Postal Service (“USPS”). A total of 37,523 names and addresses were identified and updated as the Class List. Of these, 37,523 records contained complete name and address information. KCC updated its proprietary database with the Class List.



### **MAILING OF THE NOTICE PACKET**

9. On June 14, 2021, KCC caused a double postcard containing summary notice and claim form (collectively, the “Notice Packet”) to be printed and mailed to the 37,523 complete names and mailing addresses in the Class List. A true and correct copy of the Notice Packet is attached hereto as Exhibit C.

10. Since mailing the Notice Packets to the Class Members, KCC has received 5,023 Notice Packets returned by the USPS with undeliverable addresses. Through credit bureau and/or other public source databases, KCC performed address searches for these undeliverable Notice Packets and was able to find updated addresses for 466 Class Members. KCC promptly re-mailed Notice Packets to the found new addresses.

### **PUBLICATION OF THE SUMMARY NOTICE**

11. KCC caused the Summary Notice to be published in the following media outlets: *Chicago Tribune* on June 8, 2021 and *USA Today* on June 9, 2021. A true and correct copy of the Summary Notice is attached hereto as Exhibit D. Confirmation of publication and transmittal are attached here to as Exhibit E.

### **SETTLEMENT WEBSITE**

12. On or about June 7, 2021, KCC established a website [[www.CitizensForRaunerTCPASettlement.com](http://www.CitizensForRaunerTCPASettlement.com)] dedicated to this matter to provide information to the Class Members and to answer frequently asked questions. The website URL was set forth in the Notice Packet, Summary Notice, and Claim Form. Visitors of the website can download copies of the Notice, Claim Form, and other case-related documents. Visitors can also submit claims online, and, if applicable, upload supporting documentation. As of August 24, 2021, the website has received 12,891 visits.

### **TELEPHONE HOTLINE**

13. KCC established and continues to maintain a toll-free telephone number (1-855-786-0988) for potential Class Members to call and obtain information about the Settlement, request a Notice Packet, and/or seek assistance from a live operator during regular business hours. The telephone hotline became operational on June 7, 2021, and is accessible 24 hours a day, 7 days a week. As of August 24, 2021, KCC has received a total of 35 calls to the telephone hotline, and received 12 Notice Packet requests.

### **CLAIM FORMS**

14. The postmark deadline for Class Members to file claims in this matter was August 11, 2021, however counsel extended the filing deadline to August 17, 2021. To date, KCC has received 10,032 timely-filed claim forms, 31 late filed claim forms, and 9 non-claim submissions. It is unlikely that KCC will receive any additional timely-postmarked claim forms over the next few days. Of the 10,032 timely claim submissions, 1,582 have been conclusively determined to be valid, 1,319 have been determined to be duplicate submissions, and 7,131 claim submissions have been determined to be deficient.

15. The 7,131 claims that have been determined to be deficient will be provided an opportunity to correct or “cure” their submissions. For timely submissions, the reasons a submission could be deficient are: (1) the telephone number provided on the claim form does not match records of affected telephone numbers, and (2) the contact information provided on the claim form does not match original data records. Once claimants have responded to our inquiries, KCC will review all communications and information and make a final determination for all claim submissions.

**REPORT ON EXCLUSION REQUESTS RECEIVED TO DATE**

16. The Notice informs Class Members that requests for exclusion from the Class must be postmarked no later than August 11, 2021. As of the date of this declaration, KCC has received no requests for exclusion.

**OBJECTIONS TO THE SETTLEMENT**

17. The postmark deadline for Class Members to object to the settlement was August 11, 2021. As of the date of this declaration, KCC has received no objections to the settlement.

**ADMINISTRATION COSTS**

18. As of August 27, 2021, KCC estimates its total cost of administration through conclusion of the settlement to be \$108,942.04.

19. KCC's estimated fees and charges are based on certain information provided to KCC by the parties as well as significant assumptions. Accordingly, the estimate is not intended to limit KCC's actual fees and charges, which may be less or more than estimated due to the scope of actual services or changes to the underlying facts or assumptions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 3, 2021 at San Rafael, CA.

  
JEANNE CHERNILA

**EXHIBIT A**



1 McInnis Parkway  
Suite 250  
San Rafael, CA 94903

May 14, 2021

VIA PRIORITY MAIL

«First» «Last»  
«Company»  
«Address\_1»  
«Address\_2»  
«City», «State» «Zip»

Re: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear «First» «Last»:

SEYFARTH SHAW LLP AND O'HAGAN MEYER LLC represent Bruce Rauner and Citizens for Rauner, Inc., respectively ("Defendants") in a putative class action lawsuit entitled *Peter Garvey, individually and on behalf of a class of similarly situated individuals, v. Citizens for Rauner, Inc., an Illinois corporation; and Bruce Rauner, an individual*, Case No. 1:18-cv-07919. The lawsuit is pending before the Honorable Jorge L. Alonso in the United States District Court for the Northern District of Illinois, Eastern Division. This letter is to advise you that Plaintiff filed a Motion for Preliminary Approval of Class Action Settlement in connection with this class action lawsuit on May 7, 2021.

**Case Name:** *Garvey v. Citizens for Rauner, Inc., et al.*

**Case Number:** 1:18-cv-07919

**Jurisdiction:** United States District Court,  
Northern District of Illinois, Eastern Division

**Date Settlement**

**Filed with Court:** May 7, 2021

Defendants deny any wrongdoing or liability whatsoever, but have decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the *Notice of Removal*, including the original *Class Action Complaint and Jury Demand*, original Summons (State Court action), and original *Citizens for Rauner, Inc.'s Third-Party Complaint* (against Victory Phones LLC and The Stratics Group Inc.), *First Amended Class Action Complaint and Jury Demand*, and *Citizens for Rauner, Inc.'s First Amended Third-Party Complaint* are included on the enclosed CD.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** As of May 14, 2021, the Court has not yet scheduled a final fairness hearing in this matter. The Preliminary Approval Hearing was scheduled for May 13, 2021, at 9:30 a.m. in Courtroom 1903 before the Honorable Jorge L. Alonso. Copies of *Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement*, *Notice of Unopposed Motion*, *Declaration of John Sawin*, and *[Proposed] Order Preliminarily Approving Class Action Settlement Agreement, Conditionally Certifying Settlement Class, Directing Notice of Proposed Class Settlement, and Setting a Final Approval Hearing* are included on the enclosed CD.



«First» «Last»  
May 14, 2021

3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** Copies of the *Mail Notice, Claim Form, and Publication* to be provided to the class are included on the enclosed CD.
4. **28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** A copy of the *Class Action Settlement Agreement* is included on the enclosed CD.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** As of May 14, 2021, no other **settlement** or agreement has been entered into by the Parties to this Action with each other, either directly or by and through their respective counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** No Final Judgment has been reached as of May 14, 2021. On September 3, 2020, the Court issued its *Order*, dismissing third-party defendants Victory Phones, LLC, and Stratics Group, Inc. Copies of the *Order* and *[Proposed] Order Granting Final Approval of Class Action Settlement and Final Judgment* are included on the enclosed CD.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimate of Class Members:** While KCC Class Action Services, LLC is in the process of gathering information on this issue, pursuant to 28 U.S.C. § 1715(b)(7)(A), at this time a complete list of names of **class** members as well as each State of residence is not available, because the parties do not presently know the names or current addresses of all the proposed settlement class members and will not learn this information until the Settlement is preliminarily approved and the Court authorizes dissemination of information about the Settlement through the Class Notice. Class Data is a known set of telephone numbers, and as of the time of this CAFA mailing, owner names and addresses have not been established so there is no meaningful approximation of State by State residence information available. Pursuant to 28 U.S.C. § 1715(b)(7)(B), it is estimated that there are approximately 38,000 unique phone numbers in the class.
8. **28 U.S.C. § 1715(b)(8) – Judicial Opinions Related to the Settlement:** As the proposed Settlement is still pending final approval by the Court, there **are** no other opinions available at this time. As of May 14, 2021, there has been no written judicial opinion related to the settlement.

If for any reason you believe the enclosed information does not fully comply with 28 U.S.C. § 1715, please contact the undersigned immediately so that Defendants can address any concerns or questions you may have.

Thank you.

Sincerely,

/s/  
Jeanne M. Chernila  
Case Coordinator

Enclosure – CD Rom

## **EXHIBIT B**

Last	First	Company	Address 1	Address 2	City	State	Zip
Garland	Merrick	Attorney General of the United States	United States Department of Justice	950 Pennsylvania Avenue, NW	Washington	DC	20530-0001
Taylor	Treg	Office of the Alaska Attorney General	P.O. Box 110300		Jeaneau	AK	99811
Marshall	Steve	Office of the Alabama Attorney General	501 Washington Avenue	PO Box 300152	Montgomery	AL	36130-0152
Rutledge	Leslie	Arkansas Attorney General Office	323 Center Street, Suite 200		Little Rock	AR	72201-2610
Brnovich	Mark	Office of the Arizona Attorney General	2005 N. Central Avenue		Phoenix	AZ	85004
CAFA Coordinator		Office of the Attorney General	Consumer Law Section	455 Golden Gate Ave., Suite 11000	San Francisco	CA	94102
Weiser	Phil	Office of the Colorado Attorney General	Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor	Denver	CO	80203
Tong	William	State of Connecticut Attorney General's Office	55 Elm Street		Hartford	CT	06106
Racine	Karl A.	District of Columbia Attorney General	441 4th Street, NW, Suite 1100S		Washington	DC	20001
Jennings	Kathy	Delaware Attorney General	Carvel State Office Building	820 N. French Street	Wilmington	DE	19801
Moody	Ashley	Office of the Attorney General of Florida	The Capitol, PL-01		Tallahassee	FL	32399-1050
Carr	Chris	Office of the Georgia Attorney General	40 Capitol Square, SW		Atlanta	GA	30334-1300
Connors	Clare	Office of the Hawaii Attorney General	425 Queen Street		Honolulu	HI	96813
Miller	Tom	Iowa Attorney General	Hoover State Office Building	1305 E. Walnut Street	Des Moines	IA	50319
Wasden	Lawrence	State of Idaho Attorney General's Office	700 W. Jefferson Street, Suite 210	P.O. Box 83720	Boise	ID	83720-0010
Raoul	Kwame	Illinois Attorney General	James R. Thompson Center	100 W. Randolph Street	Chicago	IL	60601
Rokita	Todd	Indiana Attorney General's Office	Indiana Government Center South	302 West Washington Street, 5th Floor	Indianapolis	IN	46204
Schmidt	Derek	Kansas Attorney General	120 S.W. 10th Ave., 2nd Floor		Topeka	KS	66612-1597
Cameron	Daniel	Office of the Kentucky Attorney General	700 Capitol Ave	Capitol Building, Suite 118	Frankfort	KY	40601
Landry	Jeff	Office of the Louisiana Attorney General	P.O. Box 94095		Baton Rouge	LA	70804-4095
Healey	Maura	Office of the Attorney General of Massachusetts	1 Ashburton Place	20th Floor	Boston	MA	02108-1518
Frosh	Brian	Office of the Maryland Attorney General	200 St. Paul Place		Baltimore	MD	21202-2202
Frey	Aaron	Office of the Maine Attorney General	State House Station 6		Augusta	ME	04333
Nessel	Dana	Office of the Michigan Attorney General	P.O. Box 30212	525 W. Ottawa Street	Lansing	MI	48909-0212
Keith Ellison	Attorney General	Attention: CAFA Coordinator	445 Minnesota Street	Suite 1400	St. Paul	MN	55101-2131
Schmitt	Eric	Missouri Attorney General's Office	Supreme Court Building	207 W. High Street	Jefferson City	MO	65101
Fitch	Lynn	Mississippi Attorney General's Office	Department of Justice	P.O. Box 220	Jackson	MS	39205
Knudsen	Austin	Office of the Montana Attorney General	Justice Bldg., 3rd Floor	215 N. Sanders Street	Helena	MT	59620-1401
Stein	Josh	Office of the North Carolina Attorney General	Department of Justice	9001 Mail Service Center	Raleigh	NC	27602-0629
Stenehjem	Wayne	North Dakota Office of the Attorney General	State Capitol	600 E. Boulevard Avenue	Bismarck	ND	58505-0040
Peterson	Doug	Office of the Nebraska Attorney General	2115 State Capitol	P.O. Box 98920	Lincoln	NE	68509-8920
Attorney General	Acting	New Hampshire Attorney General	Hew Hampshire Department of Justice	33 Capitol Street	Concord	NH	03301-6397
Grewal	Gurbir S.	Office of the New Jersey Attorney General	Richard J. Hughes Justice Complex	25 Market Street, P.O. Box 080	Trenton	NJ	08625
Balderas	Hector	Office of the New Mexico Attorney General	P.O. Drawer 1508		Santa Fe	NM	87504-1508
Ford	Aaron	Nevada Attorney General	Old Supreme Ct. Bldg.	100 North Carson Street	Carson City	NV	89701
James	Letitia	Office of the New York Attorney General	Dept. of Law - The Capitol	2nd Floor	Albany	NY	12224
Yost	Dave	Ohio Attorney General	State Office Tower	30 E. Broad Street	Columbus	OH	43266-0410
Hunter	Mike	Oklahoma Office of the Attorney General	313 NE 21st Street		Oklahoma City	OK	73105
Rosenblum	Ellen F.	Office of the Oregon Attorney General	Justice Building	1162 Court Street, NE	Salem	OR	97301
Shapiro	Josh	Pennsylvania Office of the Attorney General	1600 Strawberry Square		Harrisburg	PA	17120
Noranha	Peter F.	Rhode Island Office of the Attorney General	150 South Main Street		Providence	RI	02903
Wilson	Alan	South Carolina Attorney General	Rembert C. Dennis Office Bldg.	P.O. Box 11549	Columbia	SC	29211-1549
Ravnsborg	Jason	South Dakota Office of the Attorney General	1302 East Highway 14, Suite 1		Pierre	SD	57501-8501
Slatery, III	Herbert H.	Tennessee Attorney General and Reporter	P.O. Box 20207		Nashville	TN	37202-0207
Paxton	Ken	Attorney General of Texas	Capitol Station	P.O. Box 12548	Austin	TX	78711-2548
Reyes	Sean	Utah Office of the Attorney General	P.O. Box 142320		Salt Lake City	UT	84114-2320
Herring	Mark	Office of the Virginia Attorney General	202 North Ninth Street		Richmond	VA	23219
Donovan	TJ	Office of the Attorney General of Vermont	109 State Street		Montpelier	VT	05609-1001
Ferguson	Bob	Washington State Office of the Attorney General	1125 Washington St SE	P.O. Box 40100	Olympia	WA	98504-0100
Kaul	Josh	Office of the Wisconsin Attorney General	Dept of Justice, State Capitol	RM 114 East P.O. Box 7857	Madison	WI	53707-7857
Morrissey	Patrick	West Virginia Attorney General	State Capitol Complex, Bldg 1	Room E-26	Charleston	WV	25305
Hill	Bridget	Office of the Wyoming Attorney General	2320 Capitol Avenue		Cheyenne	WY	82002
Ala'ilima-Utu	Fainu'ulelei Falefatu	American Samoa Gov't	Exec. Ofc. Bldg		Utulei	AS	96799
Camacho	Leevin Taitano	Office of the Attorney General, ITC Building	590 S. Marine Corps Drive	Suite 901	Tamuning	Guam	96913
Manibusan	Edward	Northern Mariana Islands Attorney General	Administration Building	PO Box 10007	Saipan	MP	96950-8907
Hernández	Domingo Emanuelli	Puerto Rico Attorney General	P.O. Box 902192		San Juan	PR	00902-0192
George	Denise N.	Virgin Islands Attorney General, Department of Justice	34-38 Kronprindsens Gade	GERS Bldg, 2nd Floor	St. Thomas	VI	00802
Vick	Jordan P.	Seyfarth Shaw LLP	233 South Wacker Drive	Suite 8000	Chicago	IL	60606-6448
Bradwell	Shane M.	O'Hagan Meyer LLC	1 E. Wacker Drive	Suite 3400	Chicago	IL	60601



## **EXHIBIT C**

LEGAL NOTICE

Garvey v. Citizens For Rauner

Peter Garvey v. Citizens for Rauner, Inc.  
and Bruce Rauner

Settlement Administrator  
P.O. Box 43434  
Providence, RI 02940-3434

Case No. 18-cv-07919, U.S. District Court  
for the Northern District of Illinois

**You may be entitled to a payment from a class action settlement if you received one or more telephone calls or ringless voicemail messages from Citizens for Rauner, Inc. (“Rauner Campaign”) or in support of the gubernatorial campaign of Bruce V. Rauner (“Rauner”) (collectively, the “Defendants”) on your cellphone during the period from March 23, 2014 to May 13, 2021.**

<<3of9 Barcode>>

«BARCODE»

Postal Service: Please do not mark barcode

A federal court authorized this notice.  
This is not a solicitation from a lawyer.

Claim ID: «Claim Number»

PIN: «PIN»

File your claim online on or before

August 11, 2021 at

www.CitizensForRaunerTCPASettlement.com

RAE «Claim Number»

«FIRST1» «LAST1»

«ADDRESS LINE 1» «ADDRESS LINE 2»

«CITY», «STATE»«PROVINCE» «POSTALCODE»

«COUNTRY»

**RAE**

**CLAIM FORM**

«Claim Number»

If you wish to claim your share of the Settlement Fund, please complete, sign, and return this **Settlement Claim Form** or submit an Online Claim Form.

You must complete and submit a Claim Form by August 11, 2021. You may submit a Claim Form online at [www.CitizensForRaunerTCPASettlement.com](http://www.CitizensForRaunerTCPASettlement.com) or by completing and submitting this Claim Form to receive your share. The final amount per Class Member will depend on the total number of valid Claim Forms received. To complete this form, provide the information below and execute the certification.

First Name: \_\_\_\_\_ Last Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP Code: \_\_\_\_\_

Current Phone Number (optional): ( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_

Email (optional): \_\_\_\_\_

Telephone number on which you received one or more telephone calls or ringless voicemail messages from Citizens for Rauner, Inc. or in support of the gubernatorial campaign of Bruce Rauner that used an automatic telephone dialing system, or an artificial or prerecorded voice, during the period from March 23, 2014 to May 13, 2021:

( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_

**Certification**

By signing and submitting this Claim Form, I certify and affirm that the information I am providing is true and correct to the best of my knowledge and belief, I am over the age of 18, and I wish to claim my share of the Settlement Fund.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date (mm/dd/yyyy)

<<3OF9 BARCODE>>

<<Barcode>>

**THIS CARD PROVIDES LIMITED INFORMATION ABOUT THE SETTLEMENT.**

**VISIT [www.CitizensForRaunerTCPASettlement.com](http://www.CitizensForRaunerTCPASettlement.com) FOR MORE INFORMATION.**

A proposed settlement (the "Settlement") has been reached in a class action lawsuit, *Peter Garvey v. Citizens for Rauner, Inc. and Bruce Rauner*, Civil Action No. 18-cv-07919 (the "Action"). The lawsuit alleges that the Defendants made calls to cellphones of Class Members in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 (the "TCPA"). Defendants have denied these allegations and the Court has not decided who is right and who is wrong; however, to avoid the expense, inconvenience, and distraction of continued litigation, the parties have agreed to the Settlement described here.

**Who is included in the Settlement Class?** The Settlement Class is defined as all persons and entities throughout the United States (1) to whom Defendants placed or caused to be placed one or more telephone calls or ringless voicemail messages; (2) directed to a number assigned to a cellular telephone service; (3) using an automatic telephone dialing system, or artificial or prerecorded voice; (4) from March 23, 2014 to May 13, 2021. That cellphone number is **<PhoneNumber>**. If this is your cellphone number, then you could be a member of the Settlement Class.

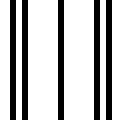
**What benefits can I receive from the Settlement?** Under the Settlement, Defendants have agreed to provide monetary compensation to Class Members who timely submit valid claims. The total Settlement Fund is \$1,000,000. The amount of the check that you will be sent is not yet known, because it depends on the number of Class Members who timely submit valid claims, the costs of settlement administration, attorneys' fees and costs, and an incentive award for the Class Representative, all of which will be paid from the Settlement Fund. Every Settlement Class Member who submits a timely, valid claim will be sent a check in the same amount. **Submitting a timely and valid Claim Form is the only way to receive a payment from the Settlement and is the only thing you need to do to receive a payment.**

**How can I get a settlement award?** To qualify for payment, you must timely submit a valid Claim Form to *Garvey v. Citizens For Rauner* Settlement Administrator, P.O. Box 43434, Providence, RI 02940-3434, postmarked by **August 11, 2021**, or submit an Online Claim Form to [www.CitizensForRaunerTCPASettlement.com](http://www.CitizensForRaunerTCPASettlement.com) by **August 11, 2021**.

**Your Other Rights.** You may exclude yourself or object to the Settlement by **August 11, 2021**. The complete Notice of Class Action Settlement, located at the website listed above, explains how to exclude yourself or object to the Settlement. The Court will hold a final approval hearing on September 7, 2021 at 11:00 a.m. At the final approval hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and, if so, whether final approval of the Settlement should be granted. The Court will hear objections to the Settlement, if any. The Court may also decide how much to award to Class Counsel in attorneys' fees, costs, and expenses. You may attend the hearing and ask to be heard by the Court, but you do not have to. **If you do not take any action, you will be legally bound by the Settlement and any orders or judgments entered in the Action, and will fully, finally, and forever give up any rights to prosecute Released Claims.**

**If you have questions, you may contact Class Counsel. Do not contact the Court, Defendants, or their counsel with questions.**

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SETTLEMENT ADMINISTRATOR  
PO BOX 43434  
PROVIDENCE RI 02940-3434**



## **EXHIBIT D**

LEGAL NOTICE

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**What Does the Settlement Provide?** If you are a member of the Settlement Class, you may be entitled to a payment under the Settlement. A \$1,000,000 Settlement Fund will be used to pay Settlement Class Members who submit timely, valid Claim Forms.

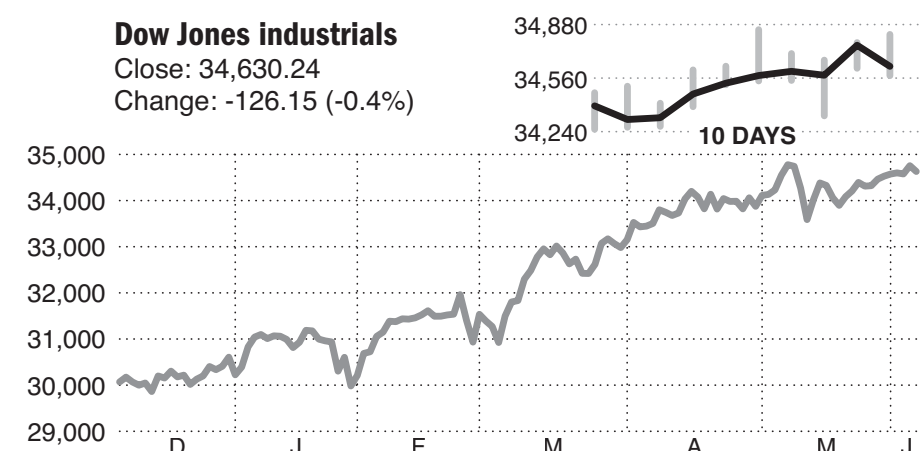
**How Can I Get a Payment?** If you believe that you are a member of the Settlement Class and you have not already received a Notice of Class Action Settlement, it is important that you contact the Settlement Administrator (KCC Class Action Services LLC) **immediately** to protect your rights by calling **1-855-786-0988** or visiting **[www.CitizensForRaunerTCPASettlement.com](http://www.CitizensForRaunerTCPASettlement.com)**. If you are a member of the Settlement Class, your deadline to submit a Claim Form, or opt out of or object to the Settlement is **August 11, 2021**.

**For more information:** [www.CitizensForRaunerTCPASettlement.com](http://www.CitizensForRaunerTCPASettlement.com)

# **EXHIBIT E**

MARKET ROUNDUP

Dow High: 34,820.91 Low: 34,574.51 Previous: 34,756.39



Market summary boxes for Nasdaq (+67.23), S&P 500 (-3.37), Russell 2000 (+32.77), and various commodities like 10-yr T-note and Gold futures.

Major market growth and decline

5-day, 30-day, and 1-year % change for DOW, NASD, and S&P indices.

FUTURES table with columns for COMMODITY, AMOUNT-PRICE, MO., OPEN, HIGH, LOW, SETTLE, and CHG.

LOCAL STOCKS

Table of local stocks with columns for STOCK, XCHG., CLOSE, and CHG.

MOST ACTIVE STOCKS

Table of most active stocks with columns for STOCK, CLOSE, and CHG.

LARGEST COMPANIES

Table of largest companies with columns for STOCK, CLOSE, and CHG.

LARGEST MUTUAL FUNDS

Table of largest mutual funds with columns for FUND, NAV, CHG, and 1-YR %RTN.

TREASURY YIELDS

Table of treasury yields for different durations.

SPOT METALS

Table of spot metal prices for Gold, Silver, and Platinum.

INTEREST RATES

Table of interest rates for Prime Rate, Fed Funds Target, etc.

FOREIGN EXCHANGE

Table of foreign exchange rates for various countries like Argentina, Australia, etc.

NASDAQ STOCK MARKET table with columns for STOCK, CLOSE, and CHG.

FOREIGN MARKETS

Table of foreign market indices like Shanghai, Stoxx600, etc.

Table of various mutual funds like American Funds, Fidelity, etc.

Groceries

from Page 1
cooking classes and demonstrations on social media.
The store has fresh produce and meat departments, cheese and charcuterie and a bakery with goods from local brands like La Fourchette, Molly's Cupcakes and Big Fat Cookie. There's also a display dedicated to companies working with Chicago food business incubator The Hatchery.



Carlos Rosas makes poke bowls in the Gohan section of the soon-to-open Dom's Kitchen & Market.

Bill Bishop, co-founder of Barrington-based grocery industry consulting firm Brick Meets Click, said the store's focus on prepared foods would resonate with shoppers who lacked the time or skills to make interesting meals at home but don't want to eat out all the time.

pickup to prepared foods and eventually all items. They are still evaluating whether to offer home delivery but don't plan to partner with third-party companies like Instacart. While Dom's, like other employers, found hiring tougher than usual, they are close to their goal of hiring 160 people. Wages start at \$15.50 per hour, though jobs requiring more specialized skills pay more.

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Office

from Page 1
man, president and CEO. "Even if you overcome the pandemic, there are lingering views that you want to have more space. I would say we've de-densified the campus by about a third of its previous capacity." The glassy, curved buildings are familiar to motorists along Lake Cook Road and interstates 94 and 294. Two of the three office buildings were renovated between April 2020 and this February. Work on the third building began in January and is expected to be completed in August.

The design challenge was to take one of the fanciest office campuses in the Chicago suburbs, completed just a decade earlier, and tailor the 650,000 square feet of space to another drug company's post-pandemic needs. The company declined to say how much it invested in upgrades to the campus. The layout of the sprawling concourse that connects the buildings was opened up and refreshed in the redesign. It now includes a cafeteria with several food stations and a coffee bar, both of which accept mobile orders. The seating area is large enough to hold hundreds of employees for meetings or events.

There also is a golf simulator and a fully renovated fitness center. It includes one work-from-home touch — Peloton bikes that employees can use with their own accounts. About 85% of Horizon's employees are fully vaccinated or awaiting their second shot, Walbert said. In June, the company began allowing workers with proof of vaccination to be in the office without a mask. "People are used to working from home, so when they come in, they may not want to go back to just sitting in an office," Walbert said. "They can move around, interact, get coffee, socialize and get to know people again."



A bar, pool table and golf simulator are part of the Woods Lounge inside of Horizon Therapeutics' new headquarters.



A deluxe gym inside of Horizon Therapeutics' new headquarters in Deerfield.

let in more light. "It was pretty dark in here," said Todd Emeott, associate principal at Lamar Johnson Collaborative. "We did our best to open up the space and make it feel less claustrophobic." Some private offices remain, while others were converted to conference rooms. Cubicles remain part of the layout, but there are fewer of them and with higher barriers. Outdoor space includes a 2-mile walking and running path around the campus, a large garden that employees can tend and a 2,400-square-foot deck under construction outside one office building. There's also a day care in a smaller building. Workers slowly began returning to the new office in February, and Horizon now has 100 to 150 coming in each day. By the end of the year, almost 1,000 people a day are expected, Walbert said.

There's room to grow to 2,000 employees, and potentially much more if the company expands the campus onto vacant land. Japan-based Takeda put the Deerfield property up for sale in October 2019, a few months after the company announced it would close its approximately 1,000-worker U.S. headquarters by the end of that year. The work shifted to Boston after Takeda acquired Irish drug-maker Shire. Horizon previously had its U.S. headquarters in Lake Forest. The company also has a downtown Chicago office and space in other cities, including a global headquarters under construction in Dublin. The company has grown from about 1,300 total employees before the pandemic to more than 1,700, Walbert said. The campus already has zoning approval for additional structures. "We've been excited by four or five different folks to put restaurants on-site or a hotel on-site," Walbert said. "We'll keep this for ourselves. We've been growing so fast that we want to preserve all of that land for our own future growth."

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Twitter @Ryan\_Orl

FOR THE RECORD

Table with columns: Team, W, L, Pct, GB. Includes MLB, American League East Division, Central Division, West Division, Monday's Games, Tuesday's Games, Wednesday's Games.

Table with columns: Team, W, L, Pct, GB. Includes Wednesday's Games, Thursday's Games, WNBA, Eastern, Western, Soccer, MLS Eastern, Western, Monday's Games, Tuesday's Games, Wednesday's Games.

Table with columns: Team, W, L, T, Pts, GF, GA. Includes Wednesday, Wednesday's Games, Saturday's Games, Wednesday's Games.

Table with columns: Team, W, L, T, Pts, GF, GA. Includes Dudy Noble Field Starkville, Miss., Monday, June 7, Saturday's Games.

Table with columns: Team, W, L, Pct, GB. Includes Monday's Games, Tuesday's Games, Wednesday's Games.

Table with columns: Team, W, L, Pct, GB. Includes Monday's Games, Tuesday's Games, Wednesday's Games.

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Table with columns: French Open, WTA Nottingham Open, Nottingham Tennis Centre, Nottingham, Great Britain.

Table with columns: BASEBALL, Major League Baseball, American League, National League.

# No. 5 Tsitsipas defeats Medvedev, to play Zverev

Samuel Petrequin  
The Associated Press

PARIS — Stefanos Tsitsipas and Alexander Zverev have been viewed as potential future stars of tennis. Both have come close to Grand Slam tournament titles.

Now the pair of 20-somethings will meet each other for a berth in the French Open final after straight-set quarterfinal victories Tuesday.

The No. 5-seeded Tsitsipas reached his fourth major semifinal — and second in a row at Roland Garros — by upending No. 2 Daniil Medvedev 6-3, 7-6 (7-3), 7-5 at Court Philippe Charrier in the last no-spectator night session of this year's tournament.

Tsitsipas escaped two set points held by two-time Slam runner-up Medvedev at 5-4 in the second but otherwise required only slightly more work than was demanded of Zverev in his 6-4, 6-1, 6-1 victory over unseeded Alejandro Davidovich Fokina.

That put No. 6 Zverev in his third Slam semifinal, first in Paris.

Tsitsipas is a 22-year-old from Greece. Zverev is a 24-year-old from Germany. Both have won Masters 1000 titles on red clay this year. Both have won the season-ending ATP Finals. Both intend to — and, truthfully, are expected to — claim one of the four biggest prizes in their sport.

“Look, it’s fairly obvious that all tennis players are playing tennis for the Slams,” said Zverev, the runner-up to good pal Dominic Thiem at last year’s U.S. Open. “Obviously, the Grand Slams are the tournaments that we want to win the most. Before, maybe, the last few years, I was putting too much pressure on myself. ... Before Medvedev and Tsitsipas

### Wednesday lookahead

Coco Gauff looks to take the next step in her rapid rise when she faces Barbora Krejckikova in the first Grand Slam tournament quarterfinal for both. Gauff, a 17-year-old American, can become the youngest woman in the semifinals at any major tournament since 2006. She is seeded 24th. If Gauff wins, she will be the youngest American woman to reach the final four in Paris since Jennifer Capriati was 14 in 1990. Krejckikova is a 25-year-old from the Czech Republic who is ranked 33rd and narrowly missed out on being seeded at Roland Garros. Gauff is playing in her seventh Grand Slam tournament; Krejckikova in her fifth. The day’s second women’s quarterfinal is 2020 French Open champion Iga Swiatek against 17th-seeded Maria Sakkari, who is making her Slam quarterfinal debut. In the men’s quarterfinals, 13-time champion Rafael Nadal faces No. 10 seed Diego Schwartzman, before No. 1 Novak Djokovic meets No. 9 Matteo Bertrettini at night. That will be the first night session of this year’s tournament with fans allowed because a coronavirus curfew that has required spectators to clear out by 9 p.m. now will take effect two hours later.

— The Associated Press

arrived, I was seen as this guy that was going to all of a sudden take over the tennis world.

“I was putting pressure on myself, as well,” Zverev continued. “I was not very patient with myself, which I feel like now, maybe, I learned how to deal with the situation a little bit better.”

Tsitsipas goes into Friday with a 0-3 mark in Slam semifinals.

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