IN CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, CHANCERY DIVISION

TANISHA RODRIGUEZ, on behalf of herself and all others similarly situated,)))
A Proposed Class Action)
Plaintiff,	
v.) Case No. 2020-CH-07031
)) Hon, Neil H. Cohen
MAT ASPHALT LLC,) non. Nen H. Conen)
Defendant.)

DECLARATION OF KATIE OUELLETTE

- 1. My name is Katie Ouellette and I am over 18 years of age.
- 2. I am currently employed as a paralegal with the law firm of Liddle Sheets Coulson P.C. and have been employed continuously with the firm since January of 2007.
- 3. In addition to being Ms. Sheets' paralegal, I am also the lead settlement administrator for the firm's class action settlements.
- 4. For more than 15 years, I have administered many dozens of class action settlements in air pollution cases similar to this one. I and the firm have extensive experience in developing class notice lists, mailing settlement notices, communicating with class members, and supporting class members in making claims.
- 5. On November 17, 2023, this Court granted preliminary approval of the class action settlement in this case.

6. On December 8, 2023, Notice was dispatched to 4,924 households within the class area via first class mail. On that same date, I caused notice to be published in the McKinley Park News.

7. As of January 23, 2024, more than 500 valid claim forms have been received and processed. Based on my experience, and our efforts to give class members every opportunity to make and/or complete claims, I anticipate that additional claim forms will come in before the postmarked deadline of January 22, 2024.

8. In order to ensure that every possible Class Member that would like to make a claim has the opportunity to do so, I have sent many emails and made many phone calls to Class Members to help them make and/or complete claims.

9. As of January 23, 2024, Class Counsel has received one (1) objection to the Settlement.

10. As of January 23, 2024, Class Counsel has received seventeen (17) opt outs from the Settlement. The January 8, 2024 deadline for submitting opt-outs and objections has passed.

12. As of January 23, 2024, LSC staff, including myself, have dedicated more than 150 hours to supporting the litigation efforts in this case, and to administration of this settlement.

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

Executed this 23rd day of January 2024 in Detroit, Michigan.

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Katie Ouellette