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8 PSC Members – Political Subdivisions

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11	SANTA CRUZ COUNTY, CALIFORNIA;)	Case No. 3:21-md-02996-CRB
	POPE COUNTY, ILLINOIS; and THE)	
12	VILLAGE OF EDDYVILLE, ILLINOIS,)	DECLARATION OF ROMA PETKAUSKAS,
	Individually and on Behalf of a Class of)	ESQ. REGARDING PARTICIPATION
13	Persons Similarly Situated)	RATES
)	
14	In re MCKINSEY & CO., INC. NATIONAL)	DATE: February 2, 2024
	PRESCRIPTION OPIATE CONSULTANT)	TIME: 10:00 a.m.
15	LITIGATION)	DEPT: Courtroom 6, 17th Floor
)	JUDGE: Honorable Charles R. Breyer
16	_____)		
	This Document Relates To:)	
17)	
	ALL SUBDIVISION ACTIONS)	
18	_____)		

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1 1. ***The Declarant.*** My name is Roma Petkauskas. I am a partner at BrownGreer
2 PLC, located at 250 Rocketts Way, Richmond, Virginia 23231 (“BrownGreer”). BrownGreer
3 is a nationally renowned claims administration firm.

4 2. ***The General Basis of this Declaration.*** The matters set forth in this Declaration
5 are based upon my personal knowledge and information provided by my colleagues at
6 BrownGreer.

7 3. ***Purpose of this Declaration.*** I submit this Declaration to describe our
8 determination of participation rates in *In re: McKinsey & Co., Inc. National Prescription Opiate*
9 *Consultant Litigation*, No. 21-md-02996-CRB, in the United States District Court for the Northern
10 District of California.

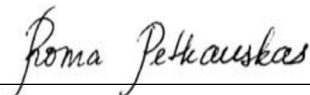
11 4. ***Participation Rate By Opt Outs Count:*** I have determined that the class size in
12 this matter is 33,246. I calculated this figure using the total number of General Purpose
13 Governments and Special Districts, excluding those in the State of Indiana, obtained in data
14 acquired by BrownGreer acting as Settlement Administrator in the National Opioids Settlement
15 Matters. With 79 Opt Outs, the total participation rate for the class is 99.76%.

16 5. ***Participation Rate By Opt Outs Population:*** I used population of the 79 Opt Outs,
17 as contained in data acquired by BrownGreer acting as Settlement Administrator in the National
18 Opioids Settlement Matters, along with the population of the United States, as reported by the U.S.
19 Census Bureau. The population of the 79 Opt Outs in the BrownGreer data is 6,958,791. The
20 total population of the United States, excluding the State of Indiana, is 331,258,387¹. I have
21 calculated the population-based participation rate for the class as 97.90%.

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27 ¹ Annual Estimates of the Resident Population for the United States, Regions, States, District of Columbia, and Puerto
28 Rico: April 1, 2020 to July 1, 2023 (NST-EST2023-POP). Source: U.S. Census Bureau, Population Division. Release
Date: December 2023.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on
2 January 26, 2024.

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ROMA PETKAUSKAS, ESQ.