

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**

---

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**DECLARATION OF CHRISTOPHER  
P. RENZ IN SUPPORT OF  
PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

---

I, Christopher P. Renz, declare:

1. I am an attorney licensed to practice before the courts of the State of Minnesota and admitted to practice before this Honorable Court. I am serving as counsel on behalf of the Plaintiffs and the putative class in this litigation. I am a partner in the firm Chestnut Cambronne, PA. I submit this Declaration in support of Plaintiff's Motion for Final Approval of Class Action Settlement.

2. Plaintiffs' counsel are confident in the claims of Plaintiffs in this matter, which is why the claims were brought in the first instance and those claims defended in opposing Defendant's Motion to Dismiss. However, in advising Plaintiffs regarding settling the dispute with Defendant, Plaintiffs' counsel understood and relayed that there is inherent risk in litigation and that risk includes the possibility that Plaintiffs would continue their pursuit of this case, but ultimately end up with a judgment lower in amount than what is recovered for Plaintiffs via the settlement. Plaintiffs' counsel was also cognizant that pursuit of the claims could go on for a very long time, including through summary judgment, trials, and appeals.

3. The individual Plaintiffs, as representatives of the Settlement Class, spent significant time and effort in pursuing this matter, including discussions with Settlement Class Counsel, responding to Defendant's discovery requests through Class Counsel, and evaluating potential settlements with Class Counsel.

4. I am unaware of any state's attorney general having responded to the CAFA Notice sent in this case.

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

Executed this 27th day of May 2025, in Minneapolis, Minnesota.

*s/ Christopher P. Renz*

Christopher P. Renz