

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

DOUGLAS S. CHABOT, et al.,  
Individually and on Behalf of All  
Others Similarly Situated,

Plaintiffs,

vs.

WALGREENS BOOTS ALLIANCE,  
INC., et al.,

Defendants.

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) Civ. Action No. 1:18-cv-02118-JPW

)

) CLASS ACTION

)

) DECLARATION OF COREY M.

)

) DAYTON IN SUPPORT OF

)

) SETTLEMENT MOTIONS

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I, COREY M. DAYTON, hereby declare as follows:

1. I submit this declaration to provide the Court with a description of my efforts in pursuit of this Action, and to express my support for the proposed Settlement of this Action.

2. As set forth below, I fully support the proposed \$192.5 million Settlement of this Action and believe that it is an outstanding result for the Class.

3. I have personal knowledge of the matters set forth in this Declaration, as I have been directly involved in monitoring the prosecution of the Action, as well as the negotiations leading to the Settlement.

4. I have been involved in this Action since November 2, 2018, when I filed the initial complaint in the above-captioned action. On November 16, 2018, the Court appointed me, along with Douglas S. Chabot as Lead Plaintiffs in this Action. On January 21, 2020, the Court appointed us as Class Representatives.

5. I understand the requirements and responsibilities of a representative plaintiff in a securities class action. As a Lead Plaintiff and Class Representative, I understand that it is my duty to monitor the progress of the litigation, in consultation with counsel. Throughout this case, I have complied with those duties.

6. I frequently corresponded with Lead Counsel at Robbins Geller Rudman & Dowd LLP (“Lead Counsel”) throughout this case. They kept me up to date on the developments in this Action. This included my review of updates

regarding all significant events in the Action, as well as my review of quarterly reports throughout its duration.

7. I participated in discovery in the Action. I provided Lead Counsel with records of my trades in Rite Aid Corporation common stock, which were produced to Defendants in this Action. I allowed e-discovery personnel at Lead Counsel to search my email account for responsive documents. In addition, I spoke to and emailed with Lead Counsel extensively to respond to Defendants' discovery requests and to prepare for my deposition.

8. I was deposed by Defendants on September 11, 2019 in connection with my seeking appointment as a Class Representative. My deposition took place at Defendants' counsel's offices in Dallas, Texas and lasted from 10:03 a.m. to 5:55 p.m. Defendants' counsel introduced and questioned me regarding a total of 32 exhibits during that deposition.

9. I reviewed the key filings in this Action that I received from Lead Counsel, including the initial and amended complaints, briefing and the Court's order on Defendants' motion to dismiss, the Court's order on summary judgment, among other case materials that Lead Counsel sent to me. In addition, I conferred with Lead Counsel on multiple occasions in connection with the mediation and about whether to agree to the Settlement.

10. I have monitored the progress of the litigation in consultation with Lead Counsel Robbins Geller. In fulfillment of my responsibilities on behalf of all Class Members, I:

(a) participated in numerous phone calls and email communications with Lead Counsel, including reviewing quarterly reports regarding the status of this case throughout its duration, reviewing and responding to dozens of emailed updates, and participating in two in-person meetings;

(b) provided my input regarding the prosecution of the case during those communications and meetings;

(c) searched for and provided responsive information pursuant to Defendants' discovery requests, including searching my emails and personally producing 134 documents;

(d) extensively prepared for and provided several hours of deposition testimony in an all-day deposition from 10:03 a.m. to 5:55 p.m.;

(e) received and reviewed certain material filed in the case and opinions of the Court, some of which I reviewed before they were submitted to Court;

(f) consulted with Lead Counsel and provided input regarding mediation and settlement strategy through multiple conversations with Lead Counsel throughout the mediation and potential settlement process; and

(g) considered and approved the proposed Settlement in light of all circumstances concerning the litigation.

11. As a Court-appointed Lead Plaintiff and Class Representative, I devoted significant time overseeing the progress of the case, reading case-related documents, producing documents, preparing for and providing my deposition testimony, and staying abreast of factual and procedural developments. I therefore devoted significant time to representing the Class in my capacity as Lead Plaintiff in this Action, which was time that I otherwise would have spent working in my regular job as product regulatory compliance engineer for Fujitsu Network Communications, Inc. I estimate that I have expended a total of approximately 55.5 hours pursuing the claims in this Action since the Fall of 2018.

12. I am respectfully requesting reimbursement in the amount of \$21,000 for the time I devoted to participating in this Action, which was necessary to help achieve this recovery for the Class. I believe that this amount is fair and reasonable for the amount of time and effort that I devoted to this litigation, especially considering my qualifications, experience, and compensation in my professional life.

13. I fully support the Settlement. This is an excellent result achieved by counsel, when considering the strengths and weaknesses of the claims and the risks and considerable costs in time and expenses if the Action were to continue. I support the requested award of attorneys' fees in the amount of 30% of the Settlement

Amount. I take seriously my role as Class Representative to ensure that the attorneys' fees are fair in light of the result achieved for the Class and reasonably compensate Lead Counsel for the work involved and the substantial risks they undertook in litigation this Action.

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

Executed this 2nd day of January, 2024.

DocuSigned by:  
*Corey M. Dayton*  
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COREY M. DAYTON

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on January 3, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Knotts

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DAVID A. KNOTTS

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# Mailing Information for a Case 1:18-cv-02118-JPW Chabot et al v. Walgreens Boots Alliance, Inc. et al

## Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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- **Thomas G. Collins**  
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## Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Mason Capital Master Fund, L.P.

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Recovery Master, LLC

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