

**THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF LEE, STATE OF ILLINOIS**

JOHN DOE,)	
Plaintiff,)	
v.)	
)	Case No. 2021L00026
KATHERINE SHAW BETHEA HOSPITAL,)	
KSB MEDICAL GROUP, INC.,)	
Defendants.)	
)	

**DECLARATION OF ERIC JOHNSON IN SUPPORT OF
PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY
CLASS ACTION SETTLEMENT APPROVAL**

1. My name is Eric Johnson. I am over the age of 18, capable of making this declaration, and do declare under penalty of perjury that the facts set out in this declaration are true to the best of my knowledge.

2. I am an attorney who has been admitted to practice before this Court in the above-captioned matter.

3. I am a shareholder at the law firm Simmons Hanly Conroy, LLC who represents Plaintiff in the above captioned matter.

4. I submit this Declaration in support of Plaintiff’s Assented to Motion for Preliminary Class Action Settlement Approval.

PLAINTIFF IS AN ADEQUATE CLASS REPRESENTATIVE

5. Throughout the course of this litigation, Plaintiff John Doe has demonstrated his commitment to representing the proposed class. He has assisted in the litigation by providing factual information to support the class complaint and appearing at mediation. In addition, Plaintiff John Doe has maintained contact with counsel regarding the status of the case.

6. Plaintiff has no known conflicts of interest with any of the proposed class members and has confirmed that he is committed to the prosecution of this case on behalf of the class.

PLAINTIFF’S COUNSEL ARE QUALIFIED TO SERVE AS CLASS COUNSEL

7. Plaintiff’s counsel have substantial experience litigating class actions and privacy cases and are well-qualified to serve as Class Counsel in this action.

8. Plaintiff’s counsel do not have any known conflicts of interest in representing the putative class and have demonstrated that they are dedicated to the aggressive prosecution of this case on behalf of the class.

9. Plaintiff’s counsel have devoted significant time pursuing this matter, including diligently investigating the claims prior to commencement of the action; vigorously pursuing discovery; and, securing valuable relief to the class without significant cost to its members.

10. Simmons Hanly Conroy, LLC (“SHC”) is a national litigation firm with offices in Illinois, Missouri, New York, and California. Since its founding in 1999, SHC has recovered over \$4 billion in verdicts and settlements for its clients. In the class action field, SHC members have served as class counsel or co-counsel on a number of cases, including *Parko v. Shell Oil Company*, 3:12-cv-00336-NJR-RJD (S.D. Ill.); *Keltner v. SunCoke Energy, Inc.*, Case No. 2014-L-1540 (Ill. Cir. Ct., Madison Co.); *Buck et. al v. Republic Services, Inc.*, 4:13-cv-801-TCM (E.D.Mo.); *Chambers v. Merrill Lynch & Co., Inc., et al.*, 10-cv-07109 (S.D.N.Y.); *Madanat v. First Data Corporation*, 11-cv-364 (E.D.N.Y.); *Closson v. Bank of America*, 04-436877 (Cal. Super. Ct., S.F. Co.); *Remson v. Verizon*, 07-cv-5296 (E.D.N.Y.); *Jones v. Honeywell International, Inc.*, 04-009174 (Fla. Cir. Ct., Hillsborough Co.); *Thomas v. ConocoPhillips, Inc.*, 2008 CA 001381 (Fla. Cir. Ct., Escambia Co.).

11. SHC is also a leader in national mass tort litigation. SHC partner Jayne Conroy is currently Co-Lead Counsel in *In re: National Prescription Opiate Litigation*, MDL 2804 (N.D. Ohio), and lawyers at the firm currently serve or have served on the Plaintiffs' Executive and/or Steering Committees in: *In Re: Testosterone Replacement Therapy Products Liability Litigation*, MDL 2545 (N.D. Ill.); *In Re Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Products Liability Litigation*, MDL 2100 (S.D. Ill.); *In Re: Chantix (Varenicline) Products Liability Litigation*, MDL 2092 (N.D. Ala.); *In Re: Depuy Orthopaedics, Inc. Pinnacle Hip Implant Product Liability Litigation*, MDL 2244 (N.D. Tex.); *In Re: Actos (Pioglitazone) Products Liability Litigation*, MDL 2299 (W.D. La.); *In re Propecia (Finasteride) Products Liability Litigation*, MDL No. 2331 (S.D.N.Y.); *In re Zoloft (Sertraline Hydrochloride) Products Liability Litigation*, MDL No. 2342 (E.D. Pa.); *In re: Bausch & Lomb, Inc. Contact Lens Solution Products Liability Litigation*, MDL 1785 (D.S.C.); *In re: Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*, MDL 2151 (C.D. Cal.); *In re Zyprexa Products Liability Litigation*, MDL 1596 (E.D.N.Y.); *In re Bextra and Celebrex Marketing Sales Practices and Product Liability Litigation*, MDL 1699 (N.D. Cal.); *In re Ephedra Products Liability Litigation*, MDL 1598 (S.D.N.Y.); *In re: Medtronic, Inc. Implantable Defibrillators Product Liability Litigation*, MDL 1726 (D. Minn.). In addition, shareholders of the firm have previously served on the Plaintiffs' Executive Committee in *In re Terrorist Attacks on September 11, 2001*, MDL 1570 (S.D.N.Y.), which includes class actions, individual personal injury, death and property damage claims as well as serving as Co-Lead Counsel in the New Jersey state-court coordination *In re Zelnorm Litigation*, Case 28 (N.J. Super. Ct.).

12. Plaintiff's counsel have significant leadership roles in directing the litigation of several class action cases, including consumer privacy class action cases including, but not limited

to: *In re Google Cookie Placement Consumer Privacy Litig.*, 806 F.3d 125 (3d Cir. 2015); *In re Nickelodeon Consumer Privacy Litig.*, 827 F.3d 262 (3d Cir. 2016); *In re Facebook, Inc. Internet Tracking Litig.*, 956 F.3d 589 (9th Cir. 2020); *Doe v. Medstar, Inc.*, Case No. 24-C-20-000591 (Balt. Md. 2019); *Doe v. Virginia Mason*, Case No. 19-2-26674-1 SE (Kings County, Washington); *Doe v. Partners*, Case No. 1984-CV-01651 (Suffolk County, Massachusetts 2019); *Doe v. Sutter*, Case No. 34-2019-00258072 (Sacramento County, California); *Doe v. University Hospitals*, Case No. CV-20-9333357 (Cuyahoga County, Ohio); *Doe v. Mercy Health*, Case No. A 2002633 (Hamilton County, Ohio); and *Calhoun v. Google*, Case No. 5:20-cv-05146-LHK (N.D. Cal. 2020).

13. Additional information regarding SHC and Plaintiff's counsel's experience can be found in SHC's resume, attached as Exhibit A, and on the firm's website, located at www.simmonsfirm.com.

Dated: December 6, 2022

Respectfully submitted,

/s/ Eric Johnson

Eric Johnson

Attorney for Plaintiff and the Putative Class