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Attorneys for Defendants  
WALGREEN CO. and WALGREEN PHARMACY SERVICES MIDWEST, LLC

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

SERENA NARO, individually and on behalf of  
all others similarly situated; TRISH  
GONZALES, individually and on behalf of all  
others similarly situated; AND THE  
CALIFORNIA LABOR AND WORKFORCE  
DEVELOPMENT AGENCY ex rel. SERENA  
NARO AND TRISH GONZALES, a California  
governmental entity,

Plaintiffs,

v.

WALGREEN CO., an Illinois corporation; and  
WALGREEN PHARMACY SERVICES  
MIDWEST, LLC, an Illinois corporation; and  
DOES 1-15,

Defendants.

Case No. 4:22-cv-03170-JST

**DECLARATION OF CHRISTOPHER J.  
ARCHIBALD REGARDING  
DEFENDANTS' NOTICE TO THE  
ATTORNEY GENERAL OF THE  
UNITED STATES OF AMERICA AND  
TO THE STATE ATTORNEYS  
GENERAL OF PROPOSED CLASS  
ACTION SETTLEMENT**

(28 U.S.C. § 1715(b))

Hon. Jon S. Tigar

**DECLARATION OF CHRISTOPHER J. ARCHIBALD**

I, Christopher J. Archibald, declare as follows:

1. I am an attorney licensed to practice law before all the courts of the State of California. I am a partner with Bryan Cave Leighton Paisner LLP, counsel of record for Defendants WALGREEN CO. and WALGREEN PHARMACY SERVICES MIDWEST, LLC (“Defendants”) in this action. I have personal knowledge of the facts set forth herein. If called upon as a witness, I could testify competently thereto.

2. On June 14, 2024, pursuant to 28 U.S.C § 1715(b), Defendants served Notice of the Proposed Class Action Settlement (“CAFA Notice”) of this class action to the Attorney General of the United States of America and the Attorneys General or appropriate state official for each of the following states: Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

3. As required by 28 U.S.C. § 1715, the CAFA Notices referred to above included: (1) copies of all complaints filed in the action; (2) the proposed notice to settlement class members; (3) a copy of the Class Action and Private Attorneys General Act Settlement Agreement and Release (“Settlement Agreement”) and exhibits thereto, which sets forth the full settlement agreement entered into between Plaintiffs and Defendants; and (4) a copy of the docket in this action.

5. Attached hereto as **Exhibit 1** is a true and correct copy of the Notice mailed to the Attorney General of United States of America (with exhibits).<sup>1</sup>

6. Attached hereto as **Exhibit 2** is a true and correct copy of the Notice mailed to the Attorneys General of the States of Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri,

<sup>1</sup> Exhibit E is redacted to protect the class members’ privacy.

1 Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North  
2 Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, Tennessee, Texas, Utah,  
3 Vermont, Virginia, Washington, West Virginia, Wisconsin, and Wyoming (without exhibits). The  
4 exhibits are identical to those included in the Notice mailed to the Attorney General of the United  
5 States.

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7 I declare under penalty of perjury under the laws of the United States of America and the  
8 State of Missouri that the foregoing is true and correct, and that this Declaration was executed on  
9 June 18, 2024 in Kansas City, Missouri.

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12 /s/ Christopher J. Archibald  
Christopher J. Archibald  
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