

2. Interim Co-Lead Class Counsel will have sole authority over all matters concerning the prosecution of this litigation on behalf of Plaintiff and the proposed class, including, *inter alia*, the following duties:

- a. Determining and directing case strategy;
- b. Coordinating the work of preparing and presenting Plaintiff's claims and causes of action, including organizing and supervising Plaintiff's counsel in a manner to ensure that pretrial preparation is conducted effectively, efficiently, expeditiously, and economically;
- c. Delegating work responsibilities and monitoring the activities of Plaintiff's counsel in a manner to promote the orderly and efficient conduct of the litigation and avoid unnecessary duplication and expense;
- d. Serving as the primary contact for all communications between Plaintiff and Defendants, and acting as spokespersons for Plaintiff vis-à-vis Defendants and the Court;
- e. Directing and executing the filing of pleadings, motions, and other documents with the Court;
- f. Appearing at all court hearings and conferences on behalf of Plaintiff and the proposed class as most appropriate for effective and efficient representation, and speaking for Plaintiff and the proposed class at all such hearings and conferences;
- g. Initiating and conducting discussions and negotiations with counsel for Defendant on all matters, including settlement;
- h. Negotiating and executing stipulations with Defendant's counsel as necessary to conduct the litigation;
- i. Initiating, coordinating, and conducting all discovery;
- j. Selecting, consulting with, and employing experts, as necessary;

k. Conducting all pretrial, trial, and post-trial proceedings on behalf of Plaintiff and the proposed class, including acting as spokespersons for such class;

l. Negotiating with, retaining, and managing relations with outside vendor(s) for the collection, processing, or review of documents and electronically stored information produced in discovery;

m. Conducting or coordinating all negotiations with Defendant's counsel regarding search and production protocols, managing the review of documents produced by defendant and third parties (and the production of Plaintiffs' documents), and implementing advanced analytics for the efficient review of documents, as appropriate;

n. Encouraging and enforcing efficiency among all Plaintiffs' counsel;

o. Preparing and distributing periodic status reports to the Court and to the Parties as ordered;

p. Coordinating and communicating, as necessary, with counsel for other plaintiffs in the litigation, if any, regarding any matters addressed in this Order to ensure efficient use of the Court's and the Parties' time and resources;

q. Ensuring that all counsel for all other plaintiffs in the litigation, if any, and the proposed class members are informed of the progress of the litigation, as necessary, including sending class-wide notice, as applicable;

r. Developing and recommending for Court approval such practices and procedures pertaining to recording and reporting attorneys' fees and expenses and, on an ongoing basis, monitoring and administering such procedures;

s. Preparing an application for an award of attorneys' fees and the reimbursement of litigation expenses and court costs incurred by Plaintiff and the proposed class;

t. Overseeing the apportionment, allocation, administration, and payment of attorneys' fees and expenses that may be approved and awarded by the Court; and

u. Otherwise coordinating the work of counsel for all plaintiffs and performing such other duties as Interim Co-Lead Class Counsel deem necessary and appropriate based upon their professional judgment and/or as authorized by further order of the Court.

3. This Order shall apply to the above-captioned action and any subsequently filed related action(s), including, *inter alia*, any actions consolidated with this action and/or filed in, transferred to, and/or removed to this Court relating to the facts underlying the litigation.

4. Interim Co-Lead Class Counsel must promptly serve a copy of this Order, and all future orders pertaining to the organization, administration, and prosecution of this action, including a scheduling order (if any) in effect, on counsel for plaintiffs in any related action (once Interim Co-Lead Class Counsel are aware of any such action(s)), and on all attorneys for plaintiffs whose cases may subsequently be consolidated with this action, by overnight delivery service, facsimile, or other expeditious electronic means.

SIGNED this _____ day of October 2025.

DEREK T. GILLILAND
UNITED STATES MAGISTRATE JUDGE