EXHIBIT A

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

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LITIGATION

THIS DOCUMENT RELATES TO:

All End Payor Plaintiff Actions

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MDL No. 2445

Master File No. 2:13-MD-2445-MSG

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**DECLARATION OF ERIC J. MILLER REGARDING
STATUS OF CLAIMS PROCESSING**

I, Eric J. Miller, hereby declare as follows:

1.   I am a Senior Vice President at A.B. Data, Ltd.'s Class Action Administration Division ("A.B. Data"), whose corporate office is located in Milwaukee, Wisconsin. I am fully familiar with the facts contained in this Declaration based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2.   A.B. Data has been acting as Settlement Administrator in connection with the End-Payor Plaintiff ("EPP") Class Settlement with Defendant Indivior Inc., f/k/a Reckitt Benckiser (the "Settlement"), which Settlement was finally approved on December 4, 2023. (ECF No. 991).

3.   Co-Lead Counsel requested that I respectfully submit this Declaration to provide the Court with an update regarding the status of claims processing and an overview of the additional steps leading up to claim finalization and distribution.

BACKGROUND

4.   On August 21, 2023, this Court preliminarily approved the notice plan and claims administration process for members of the EPP Class (the "Class"). *See* ECF No. 932 and as amended ECF

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No. 935 ("Order"). As detailed in the Declaration of Elaine Pang of A.B. Data, Ltd. In Support of End-Payor Plaintiffs' Motion for Implementing Class Notice Plan (ECF No. 930-6), and pursuant to the Court's order granting preliminary approval of the notice plan and claims administration, A.B. Data was responsible for implementing the Court-approved notice plan for the Settlement. *See* Order ECF No. 932 and as amended ECF No. 935.

6.   Following the Order, on August 28, 2023, A.B. Data implemented the approved notice plan and disseminated notice to the Class. The deadline to file a claim was February 17, 2024.

7.   The notice plan provided Class members with direct notice, as well as reasonable publication notice, and included information on: (i) how to make a claim; (ii) how to get more information; and (iii) the relevant deadlines. *Id. See e.g.,* ECF No. 934-3 (Long Form Notice).

8.   Throughout the notice and claim process, both A.B. Data and Co-Lead Counsel have communicated with and responded to inquiries by many claimants about their respective claims.

STATUS OF CLAIMS ADMINISTRATION

9.   A.B. Data received over 2.3 million claims. Unfortunately, however, close to half of those claims were early on identified as potential "bot" activity, deemed fraudulent, and denied. A.B. Data took further steps to separate legitimate claims from claims filed by "bots" or "fraud farms".[1] After A.B. Data applied its fraud detection techniques, approximately one million claims remained for individual review by A.B. Data.

10.   After A.B. Data completed its initial evaluation of the remaining claims, it sent deficiency notices to certain claimants, advising them of their status and providing them with the opportunity to cure deficiencies in their claim submissions. The deficiency notices were sent between December 2024 and January 2025.

11.   In response to the deficiency notices, A.B. Data received over 80,000 responses with

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[1] "Bots" are automated software programs designed to submit a high volume of deceptive or fabricated claims through the use of AI, stolen data, and sophisticated evasion tactics to mimic human behavior, and "fraud farms" are organized groups of workers who use automated tools to carry out large-scale fraudulent activities, such as creating and submitting fake settlement claims.

documentation that needed to be analyzed for each individual claim to determine eligibility. A.B. Data also received approximately 80,000 additional fraudulent email inquiries concerning fraud farm submissions and bot programs, which needed to be identified and weeded out from the valid claim responses.

12.   After processing the documentation submissions and status updates, A.B. Data sent final determination letters to those claimants who remained deficient in part or whole. The letters, sent throughout July and August of 2025, provided another opportunity for these claimants to cure or respond within 20 days consistent with the terms of the Settlement.

13.   As of August 26, 2025, A.B. Data received over 2.3 million claims. After eliminating fraudulent claims, duplicate claims, and deficient claims, there are approximately 10,300 eligible claims.

14.   A.B. Data is currently processing approximately 200 emails per day with responses and/or additional documentation related to these determinations. Absent unforeseen circumstances, A.B. Data anticipates completing the final processing of emails and documentation by late September or early October 2025, after the last 20-day cure/response deadline expires. At that time, A.B. Data will be able to provide its proposed distribution Declaration to Co-Lead Counsel, enabling Co-Lead Counsel to file a motion respectfully requesting authorization to distribute the Net Settlement Fund to eligible Class members.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge

Executed this 5th day of September 2025 in Palm Beach Gardens, Florida.

_____
Eric J. Miller

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