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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

This Document Relates to:
ALL CLASS ACTIONS

Case No. 19-md-02913-WHO

**SUPPLEMENTAL DECLARATION OF
DENA C. SHARP IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

DATE: January 20, 2023
TIME: 1:00 p.m.
LOCATION: Zoom

HON. WILLIAM H. ORRICK III

1 I, Dena C. Sharp, declare as follows:

2 1. I am a partner of Girard Sharp LLP and am admitted to practice in the Northern
3 District of California. I am one of the Court-appointed co-lead counsel in this matter. I make this
4 declaration based on my own personal knowledge. If called upon to testify, I could and would
5 testify competently to the truth of the matters stated herein.

6 2. I submit this declaration in support of Plaintiffs' Motion for Preliminary Approval
7 of Class Action Settlement.

8 3. Attached as **Exhibit 12** is a true and correct copy of the proposed Long Form
9 Notice with redlines showing changes to the version submitted on December 19, 2022.

10 4. Attached as **Exhibit 13** is a true and correct copy of the proposed [Proposed]
11 Order Granting Preliminary Approval of Class Action Settlement, with redlines showing changes
12 to the version submitted on December 19, 2022.

13 5. Attached as **Exhibit 14** is a true and correct copy of the Class Action Settlement
14 Agreement, with redlines showing changes to the version submitted on December 19, 2022. As
15 they are subject to a pending motion to seal, the appendices to the settlement agreement (which
16 remain unchanged) are not included with **Exhibit 14**.

17 6. Plaintiffs provided a draft of the Long Form Notice to Altria on December 16,
18 2022, several days before Plaintiffs moved for preliminary approval.

19 7. On December 21, 2022, Plaintiffs received comments and proposed edits to the
20 Long Form Notice from Altria's counsel.

21 8. The parties met and conferred on December 22, 2022.

22 9. On December 29, 2022, Plaintiffs provided Altria with edits and comments in
23 response to the edits and comments Altria provided on December 21 and that the parties
24 discussed on December 22. The majority of the revisions reflected in **Exhibit 12** were made in
25 response to Altria's edits and comments and were provided to Altria on December 29.

26 10. On January 3, 2023, Plaintiffs received comments from Altria concerning
27 Plaintiffs' proposed notice plan.

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11. The parties again met and conferred regarding the Long Form Notice and the other issues raised by Altria on January 4, 2023. During this meet and confer, Altria’s counsel indicated that Altria did not object to many of the revisions to the Long Form Notice. In particular, Altria’s counsel did not provide any objections to the expanded discussion of the current posture of Altria’s appeal and the possible implications of the result of that appeal.

12. During the January 4 meet and confer, Plaintiffs’ counsel requested that Altria base any objections on the revisions Plaintiffs had agreed to make at that point.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of January, 2023 in San Francisco, CA.

/s/ Dena Sharp
Dena Sharp

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CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Dena C. Sharp
Dena C. Sharp