

The unique nature of multidistrict litigation and class actions warrant transparency, the highest regard for professional conduct, and confidence in leadership and class counsel. *See In re Zantac (Ranitidine) Prods. Liab. Litig.*, No. 20-MD-2924, 2020 WL 1669444, at *5 (S.D. Fla. Apr. 3, 2020). Because leadership and class counsel are often called upon to speak on behalf of all other counsel and their respective clients, they must fulfill their leadership duties in a manner that is dignified and trusted. It is leadership and class counsel's responsibility to oversee and manage certain vendors, including but not limited to banks, claims and settlement administrators and ensure that both counsel and claimants are credited with interest at the maximum available rate (taking into consideration market factors, risk of the investment, fees, and liquidity) and that any costs or expenses of any vendor are for work actually performed and done so at commercially reasonable rates. Outside interests have an impact on whether leadership and class counsel will adequately represent the class and whether that outside interest is vested with undue influence or control over the underlying litigation.

To that end, the Court directs each applicant for leadership or class counsel to provide the Court and the public with a declaration with written responses to the following questions. Each applicant is under a continuing obligation to supplement these responses.

1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing the litigation for this matter? Please describe your investigation and its results.
2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in this litigation? Please describe your investigation and its results.
3. Have you, your firm, any firm partner or employee, or any co-counsel accepted anything of value from any bank, settlement administrator, or vendor who is or might provide services in this matter more than \$250 (excluding the sponsorship of a large event or dinner)? Please describe your investigation and its results.
4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of this litigation? Please describe your investigation and its results. If yes, the following questions shall be answered:
 - a. Does the litigation funder have any control (direct or indirect, actual or apparent or implied) over the decision to file or the content of any motions or briefs, or any input into the decision to accept a settlement offer?
 - b. Does the financing (1) create any conflict of interest for counsel, (2) undermine counsel's obligation of vigorous advocacy, (3) affect counsel's

independent judgment, (4) give to the lender any control over litigation strategy or settlement decisions (as to either the common benefit work done by counsel or work for individual retained clients), or (5) affect party control of settlement?

c. Briefly explain the nature of the financing, the amount of the financing, and submit a copy of the documentation to the Court, or if applicable, to the Special Master.

5. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any litigation lending companies that would provide funds directly to potential claimants in this case? Please describe your investigation and its results.
6. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect), including but not limited to as an investor, Officer, Director, employee, or contractor, with any party or client/claimant involved in this MDL or class action (other than a written retainer or engagement agreement for a client in this case)? Please describe your investigation and its results.
7. Do you, any firm partner or employee, or any co-counsel partner or employee have any personal relationship (including but not limited to familial, romantic, or financial/business) with any party, client, claimant, counsel, or vendor involved in this MDL or class action? Please describe your investigation and its results.
8. Do you, your firm, any firm partner or employee, or any co-counsel represent any present parties or claimants in this litigation who you have represented in any other capacity or in any other court (either currently or within the past 3 years)? Please

describe your investigation and its results.

9. Do you, your firm, any firm partner or employee, or any co-counsel have any financial interest (direct or indirect) in any similar claims or lawsuits filed or registered by any other counsel in this MDL or class action? Please describe your investigation and its results.
10. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank or financial institution for lending services or solutions which also serves as the custodial or escrow bank in any case in which you have held a leadership position? Please describe your investigation and its results.
11. Do you know of any other relationship or fact that you believe, if known, would be material to the Court with respect to either an actual conflict of interest or the appearance of a conflict of interest that has not already been disclosed to the Court?

IT IS SO ORDERED.

Dated: August 18, 2025.

/s/ Stephen R. Bough
STEPHEN R. BOUGH
UNITED STATES DISTRICT JUDGE