

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI

Exhibit 1

**In re BJC Healthcare  
Data Breach Litigation**

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)  
)  
) **Civil Action No. 2022-CC09492**  
) **Division 1**  
)  
)

I, Lynn A. Toops, declare and state as follows:

1. I am a partner in the law firm Cohen & Malad, LLP (“C&M”) and counsel for Plaintiffs in the above-captioned action. If called and sworn as a witness, I would testify competently as to the facts in this Declaration.

2. As detailed in the Declaration of Ben Barnow my firm, along with the other firms appointed Missouri Class Counsel, have diligently worked to advance the interests of the Class in this litigation and settlement.

3. In litigating this matter, my firm has incurred a total lodestar, at our normal hourly rates, of no less than \$118,250.00, and we will continue to accrue additional lodestar through final approval and implementation of the settlement.

4. In addition, as of the date of this Declaration, my firm has incurred \$418.82 in costs and expenses in connection with this action, comprised entirely of pro hac vice fees. This does not include internal and other additional costs that my firm incurred in this litigation but, in an exercise of discretion, do not seek to recover. Based on my experience prosecuting this action and overseeing the conduct of the litigation, all of these expenses were reasonable and necessarily incurred in connection with the action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 1, 2022

/s/Lynn A. Toops  
Lynn A. Toops