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Michael A. Conger

<u>Civil Litigation</u> Employment Law Business Law Governmental Law

March 14, 2023

Via e-mail

Allyson R. Bennett Ragesh K. Tangri Morrison & Foerster, LLP 707 Wilshire Boulevard, Suite 6000 Los Angeles, CA 90017-3543 abennett@mofo.com rtangri@mofo.com

Re: Wedding, et al. v. CalPERS, JCCP No. 4936

Dear Counsel:

I have been retained the California County Retired Employees Association (CRCEA), which represents more than 180,000 county retirees in 20 California counties. CRCEA estimates that it has at least 10,000 class members subject to the proposed settlement in this case. I am writing simply to request information so that these class members can make a more informed decision regarding their options.

I have read all of the papers submitted with the motion for preliminary approval, and the court's March 10, 2023 order, including the notice to be sent to class members. I have also reviewed the available portions of CalPERS' Long-Term Care Valuation Report dated April 18, 2022, although this valuation report does not appear to be broken into the various long-term health plans.

Would you please provide me with any actuarial analysis, reports, or studies indicating the expected solvency of the CalPERS' long-term care plans involved in this proposed settlement, assuming proposed settlement is *approved*.

Please reply as soon as possible and let me know when we can expect this information. Because time is relatively short, please respond this week if possible.

Allyson R. Bennett Ragesh K. Tangri Morrison & Foerster, LLP March 14, 2023 Page 2

If you have any questions, please do not hesitate to contact me.

Thank you for your prompt attention to this request.

Very truly yours, Michael A. Conger

cc: client