

SETTLEMENT AGREEMENT OVERVIEW

Calderon et al. v. Public Partnerships, LLC

TOTAL INITIAL MONETARY PAYMENT | **\$157.5 MILLION**

1 \$40.5 Million

General Damages Payment

- From this fund, \$50 paid per class member with alleged unpaid sign-on bonus claim
- Remainder distributed proportionally based on hours worked

2 \$25 Million

Guaranteed MEC Payment

- Distributed proportionally based on amounts allocated for MEC premiums

3 \$92 Million

PTO Payment

- Distributed proportionally based on personal assistants' available PTO balances
- After paid to common fund by PPL, Class Members' PTO balances will be reduced commensurately

SECOND SETTLEMENT PAYMENT | **\$4.5 MILLION +**

A \$4.5 Million Reserve Fund

- Held in escrow by Administrator until Additional MEC Fund determined
- Administrator returns 50 cents per dollar of Additional MEC Fund paid by PPL, up to a maximum of \$4.5 million
- If zero Additional MEC Fund paid, \$4.5 million will be distributed to class

B Additional MEC Fund

Further Health Premiums Returned to Class

- All remaining MEC allocations as of April 30, 2027 to be paid, as determined by Accounting Firm



NON-MONETARY RELIEF



End of MEC Health Plan



Forensic Accounting of MEC and PTO