UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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HELEN HANKS, on behalf of herself and all others similarly situated,

Plaintiff,

vs.

VOYA RETIREMENT INSURANCE AND ANNUITY COMPANY, formerly known as Aetna Life Insurance and Annuity Company,

Defendant.

Civil Action No. 16-cv-6399

DECLARATION OF ROBERT MILLS IN SUPPORT OF PLAINTIFF'S RENEWED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

I, Robert Mills, hereby declare as follows:

1. I am an economist and Director at Micronomics, Inc., an economic research and consulting firm located in Los Angeles, California. I have been retained as an expert by Helen Hanks ("Plaintiff") in this matter and make this declaration in support of Plaintiff's "Motion for Preliminary Approval of Class Action Settlement." I have personal knowledge of the facts set forth herein, and if called as a witness, would testify competently thereto.

2. I prepared an expert report in this matter, which I understand was produced to Defendant Voya Retirement Insurance and Annuity Company ("Voya") and The Lincoln Life & Annuity Company of New York ("Lincoln") on March 1, 2018. I understand that my expert report is available, in slightly-redacted form, on the public docket in this matter at Docket No. 206-5.

My expert report provided a methodology for calculating past damages classwide.
See Mills Report ¶ 23–31. I applied the methodology set forth in my expert report to data

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produced by the defendants for the then-putative class to calculate damages through December 31, 2017. *Id.* ¶¶ 19, 33–140.

4. On July 20, 2021, I received a supplemental production of data from Voya, which was current through May 31, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19th day of January 2022, in Redondo Beach, California.

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Robert Mills