

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HELEN HANKS, on behalf of herself and all)	Civil Action No. 16-cv-6399	
others similarly situated,)		
)		
)	DECLARATION OF ROBERT	
Plaintiff,)	MILLS IN SUPPORT OF	
)	PLAINTIFF’S MOTION FOR	
vs.)	PRELIMINARY APPROVAL OF	
)	CLASS ACTION SETTLEMENT	
VOYA RETIREMENT INSURANCE)		
AND ANNUITY COMPANY,)		
formerly known as Aetna Life)		
Insurance and Annuity Company,)		
)		
Defendant.)		
)		
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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.

3. 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

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 6th day of January 2022, in Redondo Beach, California.



Robert Mills