

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Case No. 1:20-cv-00574-WO-JEP

DARYA DEARING, *et al.*,

Plaintiffs,

v.

IQVIA, INC., *et al.*,

Defendants.

**DECLARATION OF CORNELIA VIEIRA CONCERNING THE MAILING OF THE
CAFA NOTICE, SETTLEMENT NOTICE AND FORMER PARTICIPANT CLAIM
FORM, AND REPORT ON AND OBJECTIONS**

I, Cornelia Vieira, declare as follows:

1. I am a Project Manager at Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over seven years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and fifty (550) class action cases since its inception. I am over 21 years of age and am not a party to this Action. I have personal knowledge of the facts set forth herein.

2. I respectfully submit this declaration in order to provide the Court and the parties to the Action with information regarding the mailing of the notice required by the Class Action Fairness Act of 2005, 28 U.S.C. §§ 1711-1715 (“CAFA”), as well as the mailing of the notice to inform Class Members¹ of the Settlement.

3. SCS's appointment as Settlement Administrator was approved by the Court in the above-captioned litigation (the “Action”) following the Court’s Amended Order dated May 24,

¹ All capitalized terms not otherwise defined herein have the meanings set forth in the Class Action Settlement Agreement, dated as of May 15, 2024 (Dkt. 166-3, the “Settlement Agreement”).

2024, (Dkt. 169, the “Court’s Order”). Our services include: (i) providing by electronic mail notice to those Class Members for whom valid email addresses were provided; (ii) printing and mailing of notice to those Class Members for whom no valid email address was provided; (iii) establishing and maintaining the settlement website, strategicclaims.net/iqvia401k; (iv) setting up and updating a database listing the names, addresses, and email addresses of Class Members and updating information as needed; (v) re-mailing notices returned with forwarding addresses; (vi) recording all notices returned as undeliverable with no forwarding addresses and skip tracing them via commercially reasonable efforts to obtain new addresses, and re-mailing those notices where updated addresses are obtained; (vii) tracking objections; (viii) entering and processing filed Former Participant Claim Forms; (ix) responding to phone call inquiries received on the toll-free line; and (x) handling all correspondence related to the above procedures

MAILING OF THE CAFA NOTICE

4. At the request of Defense Counsel, and separate from our engagement as Settlement Administrator, on May 24, 2024, SCS mailed a notice of proposed class action settlement, pursuant to CAFA (“CAFA Letter”), to the appropriate federal and state officials by certified mail, return receipt requested, through the United States Postal Service. In addition, a website <https://strategicclaims.net/cafa> was set up where all documents referenced in the CAFA Letter could be viewed. Attached as **Exhibit A** is a copy of the CAFA Letter that SCS mailed.

MAILING OF THE NOTICE AND CLAIM FORM

5. On June 6, 2024, SCS received the class data from Defense Counsel. The class data included 56,442 entries that were identified as Class Members with a positive balance in the Plan during the Class Period, or as Beneficiaries, or Alternate Payees. Out of the 56,442 Class Members, there were valid email addresses provided for 49,380 individuals, who were emailed the Settlement Notice (the “Notice”). Prior to emailing, SCS removed duplicate email addresses from

the mailing list and verified which of the remaining email addresses were active. The remaining 7,062 Class Members were sent the Notice via first-class mail. Prior to mailing, the class data for the 7,062 individuals was run through the United States Postal Service's national change of address service to obtain new address information. Out of the 56,442 Class Members, 24,265 Class Members were identified as non-active in the class data. Out of the 24,265 non-active Class Members, 21,485 had valid email addresses and were emailed a Notice and link to the Former Participant Claim Form (the "Claim Form"), while 2,780 did not have valid email addresses and were mailed the Court-approved Notice along with a Claim Form. The remaining 32,177 Class Members received a Notice only as they are currently active participants and are not required to file a Claim Form. Out of the 32,177 Class Members identified as active participants, 27,895 received an emailed Notice, while 4,282 received a mailed Notice. Pursuant to the Court's Order, the emailing and mailing for the 56,442 Class Members were completed on June 24, 2024. Please see **Exhibit B** for a copy of the Notice and **Exhibit C** for a copy of the Notice and Claim Form as mailed, as well as **Exhibit D** for a copy of the emailed Notice to Class Members with active accounts, and **Exhibit E** for a copy of the emailed Notice and link to the Claim Form to Class Members who were identified as non-active.

6. Out of the 49,380 emails sent, 187 emails bounced back as non-deliverable, and SCS subsequently sent a Notice via first-class mail to those Class Members. Of the 187 emails that bounced back, 118 were related to non-active participants, and 69 were related to active participants. As a result, the total number of Notices and Claim Forms sent to non-active Class Members via first-class mail was 2,898, and the total number of Notices sent via first-class mail to Class Members identified as active participants was 4,351, for a total of 7,249 Notices mailed, and 49,193 notices emailed.

7. Out of the 2,898 Notice and Claim Forms mailed, 436 were returned as undeliverable. Of these, the United States Postal Service provided forwarding addresses for 48, and SCS immediately mailed another Notice and Claim Form to the updated addresses. The remaining 388 Notice and Claim Forms returned as undeliverable were “skip-traced” to obtain updated addresses, and 318 were re-mailed to updated addresses

8. Out of the 4,351 Notices mailed for the active accounts, 350 were returned as undeliverable. Of these, the United States Postal Service provided forwarding addresses for three, and SCS immediately mailed another Notice to the updated address. The remaining 347 Notices returned as undeliverable were “skip-traced” to obtain updated addresses and 283 were re-mailed to updated addresses.

9. Additionally, SCS has re-mailed a Notice and Claim Form as requested by 39 Class Members to their updated addresses.

TOLL-FREE PHONE LINE

10. On June 24, 2024, SCS made available a toll-free phone number (866-274-4004), which was included in the Notice, to which Class Members can direct questions about the Settlement.

WEBSITE

11. On June 24, 2024, SCS’s website was updated to include a specific webpage for this Settlement, strategicclaims.net/iqvia401k/. The webpage is accessible 24 hours a day, 7 days a week. The webpage contains the current status of the case; the important dates; and downloadable copies of the following documents: (i) Claim Form; (ii) Notice; (iii) the Court’s Order; (iv) the Settlement Agreement with Exhibits; and (v) the Amended Complaint filed on September 25, 2020 (Dkt. 17).

MAILING OF THE REMINDER POST CARD

12. Pursuant to the Court's Order, on August 16, 2024, the emailing or mailing of a reminder post card was completed to each Former Participant, Beneficiary, and Alternate Payee who had not returned the Claim Form by August 7, 2024, resulting in a total of 19,852 reminders emailed to those where a valid email address was provided, and 2,646 reminder post cards mailed.

13. The notice procedures described in paragraphs three (3) through twelve (12) above are consistent with the notice procedures I have used in class action cases with which I have been involved over the past seven years.

REPORT ON OBJECTIONS

14. To date, SCS has not received any objections to the fairness, reasonableness or adequacy of the Settlement, to any term of the Settlement Agreement, to the Plan of Allocation, to the proposed award of attorneys' fees and litigation expenses, to the payment of costs of administering the Settlement out of the Qualified Settlement Fund, or to the request for a Case Contribution Award for the Class Representatives. The deadline by which objections must be postmarked is October 31, 2024.

15. The 32,177 Class Members who are active will automatically receive the benefit of the Settlement. To date, SCS has received 4,216 Claim Forms. The deadline for submitting the Claim Form is September 23, 2024.

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

Signed this 15th day of October 2024, in Media, Pennsylvania.



Cornelia Vieira

EXHIBIT A



Phone 866.274.4004
610.565.9202
Fax 610.565.7985
strategicclaims.net

May 24, 2024

VIA USPS PRIORITY MAIL

TO: Federal and State Officials Identified on Attached Distribution List, *Mail Merge*.

Re: *Darya Dearing, et al. v. IQVIA Inc.*

United States District Court for the Middle District of North Carolina
Case No. 1:20-cv-00574-WO-JEP

CAFA Notice Pursuant to 28 U.S.C. § 1715

Dear CAFA Notice Recipient:

Strategic Claims Services, an independent claims administrator, on behalf of Defendants, IQVIA Inc., the Board of Directors of IQVIA Holdings Inc., and the Benefits Investment Committee (collectively, "Defendants," and with Plaintiffs, the "Settling Parties"), hereby provides your office with this notice under the provisions of the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, to advise you of the proposed settlement of the above-captioned class action lawsuit (the "Class Action") currently pending in the United States District Court for the Middle District of North Carolina.

Plaintiffs filed a Settlement Agreement ("Settlement Agreement") and associated documents with the Court on May 15, 2024. Pursuant to the Court's May 20, 2024 Text Order (ECF No. 168), based on its review of Plaintiffs' motion for preliminary approval of the settlement, the Court does not find a hearing on the motion is necessary. Therefore, there are no scheduled judicial hearings at this time.

In reference to this letter, a website has been set up for viewing the documents associated with this case. The website is <https://strategicclaims.net/cafa> and on this website, under the case name, the following documents can be found:

(1) The Complaint and any materials filed with the Complaint.

The original complaint (Dkt. No.¹ 1) and the amended complaint (Dkt. No. 17) in the Action are available on the above referenced website. In addition, the complaint, amended complaint, and all other unsealed pleadings and records filed in the Class Action are available on the internet through the federal government's PACER service at <https://ecf.ncmd.uscourts.gov/cgi-bin/ShowIndex.pl>. Additional information about the PACER service may be found at <https://www.pacer.gov>.

(2) Notice of any scheduled judicial hearing in the class action.

Pursuant to the Court's May 20, 2024 Text Order (ECF No. 168), based on its review of Plaintiffs' motion for preliminary approval of the settlement, the Court does not find a hearing on the motion

¹ Citations to "Dkt. No. ___" refer to docket entries in Case No. 1:20-cv-00574-WO-JEP.

is necessary. Therefore, there are no scheduled judicial hearings at this time. Information concerning any yet-to-be-scheduled hearings will be available through PACER and can be accessed as described in section (1) above.

(3) Any proposed or final notification to class members.

Plaintiffs' Motion for Preliminary Approval of Settlement (Dkt. No. 166), the Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Settlement (Dkt. No. 167), and all supporting documents (Dkt. Nos. 166-2 & 166-3) are available on the above referenced website. The parties' Settlement Agreement and its Exhibits A-E (Dkt. No. 166-3) are available on the above referenced website.

The proposed forms of direct notice to class members, which provide notice of the proposed settlement, are included as Exhibits A and A-1 of the Settlement Agreement are available on the above referenced website.

(4) Any proposed or final class action settlement.

As discussed in section (3) above, the parties' Settlement Agreement and its Exhibits A-E (Dkt. No. 166-3) are available on the above referenced website.

(5) Any settlement or other agreement contemporaneously made between Class Counsel and counsel for Defendants.

There are no additional agreements between Class Counsel and counsel for Defendants.

(6) A final judgment or notice of dismissal.

No final judgment or notice of dismissal has yet been entered in the Class Action. Upon entry, a copy of the Final Order and Judgment will be available through PACER and can be accessed as described in section (1) above. A proposed Final Approval Order, as filed with the Court on May 15, 2024 as Exhibit D to the Settlement Agreement, is available on the above referenced website.

(7) Names of class members who reside in each state and the estimated proportionate share of the claims of such members to the entire settlement.

Given the nature of the claims in the Class Action, it is not feasible at this time to ascertain the names of all the members of the class who reside in each state or the estimated proportionate share of the claims of such members to the proceeds of the Settlement. It also is not feasible to provide an estimate of the number of members of the class residing in each state and the estimated proportionate share of the claims of such members to the Settlement. Because this is a settlement class under Federal Rule of Civil Procedure 23(b)(1), class members do not have a right to request exclusion from the class.

(8) Any written judicial opinion relating to the materials described in sections (3) through (6).

No written judicial opinions have been issued relating to the proposed settlement as of this time.

The Defendants in this matter are represented by James O. Fleckner of Goodwin Procter LLP, 100 Northern Avenue Boston, MA 02210 and Matthew L. Riffie of Goodwin Procter LLP, 1900 N Street NW Washington, DC 20036. Should you have any questions regarding this matter, please do not hesitate to contact James O. Fleckner at (617) 570-1000 or Matthew L. Riffie at (202) 346-4000.

Thank you for your attention to this matter.

Sincerely,

Strategic Claims Services

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EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Case No. 1:20-cv-00574-WO-JEP

DARYA DEARING, *et al.*,

Plaintiffs,

v.

IQVIA, INC., *et al.*,

Defendants.

NOTICE OF PENDENCY OF CLASS ACTION AND PROPOSED SETTLEMENT

IF YOU ARE OR WERE A PARTICIPANT IN THE IQVIA 401(K) PLAN, FORMERLY KNOWN AS THE QUINTILES 401(K) PLAN, AT ANY TIME BETWEEN JUNE 23, 2014 AND MAY 24, 2024, YOU COULD RECEIVE A PAYMENT AND YOUR LEGAL RIGHTS WILL BE AFFECTED BY THIS CLASS ACTION SETTLEMENT.

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

This Notice advises you of the settlement (the “Settlement”) of a lawsuit against IQVIA Inc., the Board of Directors of IQVIA Holdings Inc., the Benefits Investment Committee, and Does No. 1-20 (collectively, “Defendants”). In the lawsuit, Plaintiffs, Darya Dearing, Janice Gullick, Nelson Sievers, and Lauren Brown, (collectively, “Plaintiffs,” and with Defendants, the “Parties”), allege that Defendants violated the Employee Retirement Income Security Act (“ERISA”) in the administration of the IQVIA 401(k) Plan, formerly known as the Quintiles 401(k) Plan (the “Plan”). Defendants deny the allegations and deny that they engaged in any improper conduct.

**YOU SHOULD READ THIS ENTIRE NOTICE CAREFULLY BECAUSE YOUR LEGAL RIGHTS
WILL BE AFFECTED, WHETHER YOU ACT OR NOT.**

Your rights and options, and the deadline for you to object if you are opposed to the Settlement, are explained in this Notice.

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BASIC INFORMATION

1. Why did I get this Notice?

Records indicate that you are or may be a Current Participant, Former Participant, Beneficiary or Alternate Payee of a Participant or Former Participant, of the Plan at any time on or after June 23, 2014, through and including May 24, 2024 (the “Class Period”).¹

You are receiving this Notice because you have a right to know about the proposed settlement of a class action lawsuit in which you are potentially a Class Member before the Court decides whether to approve the Settlement.

This Notice summarizes the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible to receive them, and how to get them.

The lawsuit is pending in the United States District Court for the Middle District of North Carolina (the “Court”). It is known as *Dearing, et al. v. IQVIA Inc., et al.*, Case No. 1:20-cv-00574-WO-JEP (M.D.N.C.) and is brought against Defendants.

2. What is this lawsuit about?

On June 23, 2020, Plaintiffs filed an action against Defendants, alleging that their administration of the Plan violated ERISA. Since the filing of the action, the parties engaged in extensive litigation, including investigation of the claims and other developments, fact and expert discovery, briefing numerous motions, and preparing for trial. These efforts afforded the Parties a comprehensive understanding of the claims and defenses at issue. The Parties participated in a mediation and engaged in follow-up negotiations over the course of several months and were ultimately able to reach the terms of the Settlement explained in this Notice. Defendants have denied and continue to deny any wrongdoing or liability, and are settling the lawsuit solely to avoid the expense, inconvenience, and inherent risk and disruption of litigation. Defendants will continue to vigorously defend the lawsuit if the proposed Settlement is not approved.

3. What is a class action lawsuit?

In a class action lawsuit, one or more people called “class representatives” sue on their own behalf and on behalf of other people who they allege have similar claims. One court resolves all the issues for all class members in a single lawsuit. Plaintiffs are the class representatives in this lawsuit and are sometimes referred to in this Notice as the “Class Representatives” or as “Plaintiffs.”

4. Why is there a settlement?

The Parties have agreed to the Settlement after extensive negotiations. By agreeing to a settlement, the Parties avoid the costs and risks of further litigation, and Plaintiffs and the other Class Members will receive compensation. Class Counsel have conducted an extensive review of the evidence in the case and the potential risks and benefits of continued litigation. Plaintiffs and Class Counsel agree that the Settlement is in the best interest of the Settlement Class. The Court has not made any finding that Defendants have done anything wrong or violated any law or regulation.

5. How do I get more information about the Settlement?

This notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement, which is available at strategicclaims.net/iqvia401k, by contacting Class Counsel (see answer to question 12 and 16 for contact information) or the Settlement Administrator (see answer to question 6 for contact information), or by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.ncmd.uscourts.gov/>.

PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK’S OFFICE, OR IQVIA INC. TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

¹ Capitalized terms not otherwise defined in this Notice shall have the same meaning as in the Settlement Agreement, which is available at strategicclaims.net/iqvia401k.

6. Who will administer the Settlement?

The Settlement Administrator, Strategic Claims Services, will administer the Settlement, including the processing of the Former Participant Claim Form, if applicable, that you may need to fill out and send in to receive any settlement payment. You may contact the Settlement Administrator by: (a) sending a letter to IQVIA 401(k) Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson Street, Suite 205, Media, PA 19063; (b) sending an e-mail to info@strategicclaims.net; (c) visiting the Settlement website at strategicclaims.net/iqvia401k; or (d) calling toll-free at (866) 274-4004.

THE SETTLEMENT BENEFITS – WHAT THE SETTLEMENT PROVIDES

7. What does the Settlement provide?

Defendants have agreed to pay a total of \$3,500,000.00 to Class Members (“Gross Settlement Amount”). Class Counsel intends to ask the Court to approve up to one-third of the Gross Settlement Amount (\$1,166,666.67) for attorneys’ fees, approve the reimbursement of reasonable and necessary litigation expenses actually incurred and carried by Class Counsel throughout the duration of the litigation, and approve a Case Contribution Award in the amount of \$12,500.00 for each Class Representative. The amount that will be available for distribution to Class Members (“Net Settlement Amount”) will be the Gross Settlement Amount *minus* the amounts used for other approved settlement purposes (Case Contribution Award, Court-approved Attorneys’ Fees and Litigation Expenses, Administrative Expenses, and certain taxes and tax-related costs).

8. How may I benefit from the Settlement?

You may be entitled to payment of a portion of the Net Settlement Amount. The amount paid to each Current Participant, Former Participant, Beneficiary, or Alternate Payee will be determined by a Plan of Allocation, which is available at strategicclaims.net/iqvia401k.

As explained below, if you are a Current Participant or Beneficiary or Alternate Payee of a Current Participant and you have an Active Account in the Plan, you do not need to take any action to receive payment under the Settlement. Payments to Current Participants or Beneficiaries or Alternate Payees of Current Participants with Active Accounts in the Plan shall be made into these persons’ individual investment accounts in the Plan.

If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant, and you no longer have an Active Account in the Plan, you will need to submit a Former Participant Claim Form by the submission deadline to receive payment under the Settlement. Payments to Former Participants or Beneficiaries or Alternate Payees of Former Participants who do not have Active Accounts in the Plan may be made either by check or tax-qualified rollover to an individual retirement account or other eligible employer plan.

9. How do I submit a claim for a Settlement Payment?

If you are a Current Participant or a Beneficiary or Alternate Payee of a Current Participant with an Active Account in the Plan, you do not need to submit a claim to be eligible for a payment under the Settlement. You will receive any payment for which you are eligible automatically in your Plan account. If you are a Former Participant or a Beneficiary or an Alternate Payee of a Former Participant and you do not have an Active Account in the Plan, you must submit a Former Participant Claim Form by the submission deadline in order to be eligible for payment under the Settlement. “Former Participant” means a member of the Settlement Class who had a Plan account with a balance greater than \$0 during the Class Period but who does not have an Active Account (*i.e.*, a balance greater than \$0) as of May 24, 2024.

If you are a Former Participant or a Beneficiary or Alternate Payee of a Former Participant and you do not have an Active Account in the Plan, and you want to receive any monetary benefits from the Settlement, you must submit the Former Participant Claim Form by no later than September 23, 2024. You must mail the Former Participant Claim Form to the address shown on the Form.

A Former Participant Claim Form will be deemed submitted when it is actually received by the Settlement

Administrator at the address listed in the Former Participant Claim Form.

Even if you do not submit a Former Participant Claim Form, you will be bound by the Settlement. (See answer to question 14 below.)

10. What are the Plaintiffs receiving from the Settlement?

Class Counsel intends to ask the Court to award a Case Contribution Award of \$12,500.00 each to the Class Representatives in recognition of the work and effort they expended on behalf of the Class.

THE SETTLEMENT BENEFITS – WHAT YOU GIVE UP

11. What do I give up by participating in the Settlement?

Each Class Member gives Defendants a “release.” A release means you give up your rights to sue Defendants or receive any benefits from any other lawsuit against Defendants if the lawsuit asserts similar claims or relates in any way to the practices or decisions at issue in this lawsuit.

For additional details about the scope of the release, consult the Settlement Agreement or contact Class Counsel. (See answer to question 5 for details.)

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court has appointed the law firms of Miller Shah LLP and Capozzi Adler, P.C. as Class Counsel. You will not be charged for the work of these lawyers. If you want to be represented by a different lawyer in this case, you may hire one at your own expense.

13. How will the lawyers (Class Counsel) be paid?

As described above, Class Counsel will ask the Court for an award of attorneys’ fees of up to one-third of the Settlement Amount based upon the value of the Settlement, the time they have devoted to this engagement, and the expenses they have advanced in prosecuting this matter.

OPTING OUT OF THE SETTLEMENT

14. Can I exclude myself from the Settlement Class?

No. The Settlement Class has been certified under Federal Rule of Civil Procedure 23(b)(1). Therefore, as a Class Member, you are bound by any judgments or orders entered in the lawsuit for all claims asserted in the lawsuit or otherwise included as Released Claims (as defined in the Settlement Agreement). If you wish to object to any part of the Settlement, you may write to the Court and counsel about why you object to the Settlement.

OBJECTING TO THE SETTLEMENT

15. What does it mean to object?

Objecting is simply telling the Court that you do not like something about the Settlement. Objecting will not have any bearing on your right to receive the benefits of the Settlement if it is approved by the Court.

16. What is the procedure for objecting to the Settlement, including any objection to Class Counsel’s Motion for Attorneys’ Fees and Litigation Expenses or Class Representatives’ Case Contribution Award?

You can ask the Court to deny approval of the Settlement and/or the Motion for Attorneys’ Fees and Litigation Expenses of Class Counsel or the Case Contribution Award to be requested for the Class Representatives by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit

will continue. If that is what you want to happen, you must object.

The Court, because of an objection or its own discretion, can award less than the amount requested by Class Counsel for attorneys' fees and expenses or the amount requested for the Case Contribution Award. While such a ruling could affect the timing and amount of settlement payments, any Court-ordered reduction in Class Counsel's attorneys' fees and expenses or the Case Contribution Award to be paid to the Class Representatives will not otherwise affect the finality of the Settlement.

Any objection to the fairness, reasonableness, or adequacy of the Settlement, to any term of the Settlement, to the Plan of Allocation, to the proposed award of attorneys' fees and litigation expenses, to the payment of costs of administering the Settlement out of the Qualified Settlement Fund, or to the request for a Case Contribution Award for the Class Representatives must be in writing in accordance with the requirements in the Preliminary Approval Order. If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must: (a) clearly identify the case name and number as *Dearing, et al. v. IQVIA Inc., et al.*, Case No. 1:20-cv-00574-WO-JEP (M.D.N.C.); (b) be submitted to the Court either by mailing them to the Clerk of the Court for the United States District Court for the Middle District of North Carolina, L. Richardson Preyer Courthouse, 324 W. Market Street, Greensboro, NC 27401-2544, or by filing them in person at any location of the United States District Court for the Middle District of North Carolina; and (c) be filed or postmarked on or before October 31, 2024.

Your objection must also include: (1) your full name, current address, and current telephone number, and, if represented by counsel, any of your counsel's names and contact information; (2) a written statement of your objection(s), specifying the reason(s) for each objection, including any supporting evidence, and whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (3) copies of any papers, brief, or other documents upon which the objection is based; (4) a list of all persons who will be called to testify in support of the objection; (5) a list of any other objections to any class action settlements you or anyone acting on your behalf has submitted in any court in the United States, whether state, federal, or otherwise, in the previous five years; and (6) your signature, even if you are represented by counsel.

Any party may file a response to an objection by a Class Member by November 21, 2024.

ANY CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED ABOVE SHALL BE DEEMED TO HAVE WAIVED ANY OBJECTION AND SHALL NOT HAVE ANY RIGHT TO OBJECT TO THE FAIRNESS OR ADEQUACY OF THE SETTLEMENT.

Clerk of the Court

U.S. District Court for the
Middle District of
North Carolina
Clerk of Court
L. Richardson Preyer
Courthouse,
324 W. Market Street,
Greensboro, NC 27401-2544

Class Counsel

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Alec J. Berin
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mriffie@goodwinlaw.com

THE COURT'S FAIRNESS HEARING

17. When/where will the Court decide whether to approve the Settlement?

On December 2, 2024, at 9:30 a.m., in the L. Richardson Preyer Courthouse, 324 W. Market Street, Greensboro, NC 27401-2544, the Court will hold a Fairness Hearing to determine whether the proposed Settlement is fair, reasonable, and adequate and whether it should be approved. The hearing may be continued from time to time by the Court without further notice, and may be held via teleconference or videoconference. Please check the website or contact Class Counsel if you wish to confirm that the hearing time has not been changed and to determine if the hearing is occurring in person or by video or teleconference.

18. Do I have to attend the Fairness Hearing?

No; however, you are welcome to attend at your own expense. If you file an objection to the Settlement, you do not have to go to Court to talk about it. As long as your objection is filed or postmarked by October 31, 2024 and you comply with the requirements in the answer to question 16 above, the Court will consider it. You may also send your own lawyer at your expense to attend the Fairness Hearing.

19. May I speak at the Fairness Hearing?

You may ask the Court for permission to speak at the hearing. Anyone wishing to appear must state in their written objection their intention to appear at the Fairness Hearing, at their own expense.

Objectors or their attorneys intending to participate at the Fairness Hearing must file a notice of intention to participate (and, if applicable, the name, address, and telephone number of the objector's attorney) with the Court no later than November 14, 2024. Any objectors, or their counsel, who do not timely file a notice of intention to participate in accordance with this Paragraph shall not be permitted to speak at the Fairness Hearing, except for good cause shown.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

IF YOU DO NOTHING AND THE COURT APPROVES OF THE SETTLEMENT, YOU AND ALL OTHER CLASS MEMBERS WILL BE BOUND BY THE JUDGMENT AND SETTLEMENT AGREEMENT, INCLUDING THE RELEASE OF CLAIMS. If you are a Current Participant or a Beneficiary or Alternate Payee of a Current Participant with an Active Account in the Plan, you do not need to take any action to be eligible to receive the Settlement benefits. If you are a Former Participant or a Beneficiary or Alternate Payee of a Former Participant and you do not have an Active Account in the Plan, you must submit a Former Participant Claim Form by the submission deadline or you will not receive any of the settlement payments described above in answer to questions 7 and 8.

DATED: June 24, 2024

**THIS NOTICE HAS BEEN SENT TO YOU BY ORDER OF
THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA.**

IQVIA 401(k) Settlement Administrator
c/o Strategic Claims Services
600 North Jackson Street, Suite 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

Mail ID
Name
Address
City, State Zip

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Case No. 1:20-cv-00574-WO-JEP

DARYA DEARING, *et al.*,

Plaintiffs,

v.

IQVIA, INC., *et al.*,

Defendants.

NOTICE OF PENDENCY OF CLASS ACTION AND PROPOSED SETTLEMENT

IF YOU ARE OR WERE A PARTICIPANT IN THE IQVIA 401(K) PLAN, FORMERLY KNOWN AS THE QUINTILES 401(K) PLAN, AT ANY TIME BETWEEN JUNE 23, 2014 AND MAY 24, 2024, YOU COULD RECEIVE A PAYMENT AND YOUR LEGAL RIGHTS WILL BE AFFECTED BY THIS CLASS ACTION SETTLEMENT.

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

This Notice advises you of the settlement (the “Settlement”) of a lawsuit against IQVIA Inc., the Board of Directors of IQVIA Holdings Inc., the Benefits Investment Committee, and Does No. 1-20 (collectively, “Defendants”). In the lawsuit, Plaintiffs, Darya Dearing, Janice Gullick, Nelson Sievers, and Lauren Brown, (collectively, “Plaintiffs,” and with Defendants, the “Parties”), allege that Defendants violated the Employee Retirement Income Security Act (“ERISA”) in the administration of the IQVIA 401(k) Plan, formerly known as the Quintiles 401(k) Plan (the “Plan”). Defendants deny the allegations and deny that they engaged in any improper conduct.

**YOU SHOULD READ THIS ENTIRE NOTICE CAREFULLY BECAUSE YOUR LEGAL RIGHTS
WILL BE AFFECTED, WHETHER YOU ACT OR NOT.**

Your rights and options, and the deadline for you to object if you are opposed to the Settlement, are explained in this Notice.

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BASIC INFORMATION

1. Why did I get this Notice?

Records indicate that you are or may be a Current Participant, Former Participant, Beneficiary or Alternate Payee of a Participant or Former Participant, of the Plan at any time on or after June 23, 2014, through and including May 24, 2024 (the “Class Period”).¹

You are receiving this Notice because you have a right to know about the proposed settlement of a class action lawsuit in which you are potentially a Class Member before the Court decides whether to approve the Settlement.

This Notice summarizes the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible to receive them, and how to get them.

The lawsuit is pending in the United States District Court for the Middle District of North Carolina (the “Court”). It is known as *Dearing, et al. v. IQVIA Inc., et al.*, Case No. 1:20-cv-00574-WO-JEP (M.D.N.C.) and is brought against Defendants.

2. What is this lawsuit about?

On June 23, 2020, Plaintiffs filed an action against Defendants, alleging that their administration of the Plan violated ERISA. Since the filing of the action, the parties engaged in extensive litigation, including investigation of the claims and other developments, fact and expert discovery, briefing numerous motions, and preparing for trial. These efforts afforded the Parties a comprehensive understanding of the claims and defenses at issue. The Parties participated in a mediation and engaged in follow-up negotiations over the course of several months and were ultimately able to reach the terms of the Settlement explained in this Notice. Defendants have denied and continue to deny any wrongdoing or liability, and are settling the lawsuit solely to avoid the expense, inconvenience, and inherent risk and disruption of litigation. Defendants will continue to vigorously defend the lawsuit if the proposed Settlement is not approved.

3. What is a class action lawsuit?

In a class action lawsuit, one or more people called “class representatives” sue on their own behalf and on behalf of other people who they allege have similar claims. One court resolves all the issues for all class members in a single lawsuit. Plaintiffs are the class representatives in this lawsuit and are sometimes referred to in this Notice as the “Class Representatives” or as “Plaintiffs.”

4. Why is there a settlement?

The Parties have agreed to the Settlement after extensive negotiations. By agreeing to a settlement, the Parties avoid the costs and risks of further litigation, and Plaintiffs and the other Class Members will receive compensation. Class Counsel have conducted an extensive review of the evidence in the case and the potential risks and benefits of continued litigation. Plaintiffs and Class Counsel agree that the Settlement is in the best interest of the Settlement Class. The Court has not made any finding that Defendants have done anything wrong or violated any law or regulation.

5. How do I get more information about the Settlement?

This notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement, which is available at strategicclaims.net/iqvia401k, by contacting Class Counsel (see answer to question 12 and 16 for contact information) or the Settlement Administrator (see answer to question 6 for contact information), or by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.ncmd.uscourts.gov/>.

PLEASE DO NOT CONTACT THE COURT, THE COURT CLERK’S OFFICE, OR IQVIA INC. TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

¹ Capitalized terms not otherwise defined in this Notice shall have the same meaning as in the Settlement Agreement, which is available at strategicclaims.net/iqvia401k.

6. Who will administer the Settlement?

The Settlement Administrator, Strategic Claims Services, will administer the Settlement, including the processing of the Former Participant Claim Form, if applicable, that you may need to fill out and send in to receive any settlement payment. You may contact the Settlement Administrator by: (a) sending a letter to IQVIA 401(k) Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson Street, Suite 205, Media, PA 19063; (b) sending an e-mail to info@strategicclaims.net; (c) visiting the Settlement website at strategicclaims.net/iqvia401k; or (d) calling toll-free at (866) 274-4004.

THE SETTLEMENT BENEFITS – WHAT THE SETTLEMENT PROVIDES

7. What does the Settlement provide?

Defendants have agreed to pay a total of \$3,500,000.00 to Class Members (“Gross Settlement Amount”). Class Counsel intends to ask the Court to approve up to one-third of the Gross Settlement Amount (\$1,166,666.67) for attorneys’ fees, approve the reimbursement of reasonable and necessary litigation expenses actually incurred and carried by Class Counsel throughout the duration of the litigation, and approve a Case Contribution Award in the amount of \$12,500.00 for each Class Representative. The amount that will be available for distribution to Class Members (“Net Settlement Amount”) will be the Gross Settlement Amount *minus* the amounts used for other approved settlement purposes (Case Contribution Award, Court-approved Attorneys’ Fees and Litigation Expenses, Administrative Expenses, and certain taxes and tax-related costs).

8. How may I benefit from the Settlement?

You may be entitled to payment of a portion of the Net Settlement Amount. The amount paid to each Current Participant, Former Participant, Beneficiary, or Alternate Payee will be determined by a Plan of Allocation, which is available at strategicclaims.net/iqvia401k.

As explained below, if you are a Current Participant or Beneficiary or Alternate Payee of a Current Participant and you have an Active Account in the Plan, you do not need to take any action to receive payment under the Settlement. Payments to Current Participants or Beneficiaries or Alternate Payees of Current Participants with Active Accounts in the Plan shall be made into these persons’ individual investment accounts in the Plan.

If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant, and you no longer have an Active Account in the Plan, you will need to submit a Former Participant Claim Form by the submission deadline to receive payment under the Settlement. Payments to Former Participants or Beneficiaries or Alternate Payees of Former Participants who do not have Active Accounts in the Plan may be made either by check or tax-qualified rollover to an individual retirement account or other eligible employer plan.

9. How do I submit a claim for a Settlement Payment?

If you are a Current Participant or a Beneficiary or Alternate Payee of a Current Participant with an Active Account in the Plan, you do not need to submit a claim to be eligible for a payment under the Settlement. You will receive any payment for which you are eligible automatically in your Plan account. If you are a Former Participant or a Beneficiary or an Alternate Payee of a Former Participant and you do not have an Active Account in the Plan, you must submit a Former Participant Claim Form by the submission deadline in order to be eligible for payment under the Settlement. “Former Participant” means a member of the Settlement Class who had a Plan account with a balance greater than \$0 during the Class Period but who does not have an Active Account (*i.e.*, a balance greater than \$0) as of May 24, 2024.

If you are a Former Participant or a Beneficiary or Alternate Payee of a Former Participant and you do not have an Active Account in the Plan, and you want to receive any monetary benefits from the Settlement, you must submit the Former Participant Claim Form by no later than September 23, 2024. You must mail the Former Participant Claim Form to the address shown on the Form.

A Former Participant Claim Form will be deemed submitted when it is actually received by the Settlement

Administrator at the address listed in the Former Participant Claim Form.

Even if you do not submit a Former Participant Claim Form, you will be bound by the Settlement. (See answer to question 14 below.)

10. What are the Plaintiffs receiving from the Settlement?

Class Counsel intends to ask the Court to award a Case Contribution Award of \$12,500.00 each to the Class Representatives in recognition of the work and effort they expended on behalf of the Class.

THE SETTLEMENT BENEFITS – WHAT YOU GIVE UP

11. What do I give up by participating in the Settlement?

Each Class Member gives Defendants a “release.” A release means you give up your rights to sue Defendants or receive any benefits from any other lawsuit against Defendants if the lawsuit asserts similar claims or relates in any way to the practices or decisions at issue in this lawsuit.

For additional details about the scope of the release, consult the Settlement Agreement or contact Class Counsel. (See answer to question 5 for details.)

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court has appointed the law firms of Miller Shah LLP and Capozzi Adler, P.C. as Class Counsel. You will not be charged for the work of these lawyers. If you want to be represented by a different lawyer in this case, you may hire one at your own expense.

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As described above, Class Counsel will ask the Court for an award of attorneys’ fees of up to one-third of the Settlement Amount based upon the value of the Settlement, the time they have devoted to this engagement, and the expenses they have advanced in prosecuting this matter.

OPTING OUT OF THE SETTLEMENT

14. Can I exclude myself from the Settlement Class?

No. The Settlement Class has been certified under Federal Rule of Civil Procedure 23(b)(1). Therefore, as a Class Member, you are bound by any judgments or orders entered in the lawsuit for all claims asserted in the lawsuit or otherwise included as Released Claims (as defined in the Settlement Agreement). If you wish to object to any part of the Settlement, you may write to the Court and counsel about why you object to the Settlement.

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will continue. If that is what you want to happen, you must object.

The Court, because of an objection or its own discretion, can award less than the amount requested by Class Counsel for attorneys' fees and expenses or the amount requested for the Case Contribution Award. While such a ruling could affect the timing and amount of settlement payments, any Court-ordered reduction in Class Counsel's attorneys' fees and expenses or the Case Contribution Award to be paid to the Class Representatives will not otherwise affect the finality of the Settlement.

Any objection to the fairness, reasonableness, or adequacy of the Settlement, to any term of the Settlement, to the Plan of Allocation, to the proposed award of attorneys' fees and litigation expenses, to the payment of costs of administering the Settlement out of the Qualified Settlement Fund, or to the request for a Case Contribution Award for the Class Representatives must be in writing in accordance with the requirements in the Preliminary Approval Order. If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney.

All written objections and supporting papers must: (a) clearly identify the case name and number as *Dearing, et al. v. IQVIA Inc., et al.*, Case No. 1:20-cv-00574-WO-JEP (M.D.N.C.); (b) be submitted to the Court either by mailing them to the Clerk of the Court for the United States District Court for the Middle District of North Carolina, L. Richardson Preyer Courthouse, 324 W. Market Street, Greensboro, NC 27401-2544, or by filing them in person at any location of the United States District Court for the Middle District of North Carolina; and (c) be filed or postmarked on or before October 31, 2024.

Your objection must also include: (1) your full name, current address, and current telephone number, and, if represented by counsel, any of your counsel's names and contact information; (2) a written statement of your objection(s), specifying the reason(s) for each objection, including any supporting evidence, and whether the objection applies only to you, to a specific subset of the Settlement Class, or to the entire Settlement Class; (3) copies of any papers, brief, or other documents upon which the objection is based; (4) a list of all persons who will be called to testify in support of the objection; (5) a list of any other objections to any class action settlements you or anyone acting on your behalf has submitted in any court in the United States, whether state, federal, or otherwise, in the previous five years; and (6) your signature, even if you are represented by counsel.

Any party may file a response to an objection by a Class Member by November 21, 2024.

ANY CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED ABOVE SHALL BE DEEMED TO HAVE WAIVED ANY OBJECTION AND SHALL NOT HAVE ANY RIGHT TO OBJECT TO THE FAIRNESS OR ADEQUACY OF THE SETTLEMENT.

Clerk of the Court

U.S. District Court for the
Middle District of
North Carolina
Clerk of Court
L. Richardson Preyer
Courthouse,
324 W. Market Street,
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Class Counsel

Laurie Rubinow
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65 Main Street
Chester, CT 06412
Tel: (866) 540-5505
lrubinow@millersshah.com

Alec J. Berin
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Suite 806
Philadelphia, PA 19103
Tel: (866) 540-5505
ajberin@millersshah.com

Defense Counsel

James O. Fleckner
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100 Northern Avenue
Boston, MA 02210
Tel: (617) 570-1000
jfleckner@goodwinlaw.com

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GOODWIN PROCTER LLP
1900 N Street, NW
Washington, D.C 20036
Tel: (202) 346-4000
mriffie@goodwinlaw.com

THE COURT'S FAIRNESS HEARING

17. When/where will the Court decide whether to approve the Settlement?

On December 2, 2024, at 9:30 a.m., in the L. Richardson Preyer Courthouse, 324 W. Market Street, Greensboro, NC 27401-2544, the Court will hold a Fairness Hearing to determine whether the proposed Settlement is fair, reasonable, and adequate and whether it should be approved. The hearing may be continued from time to time by the Court without further notice, and may be held via teleconference or videoconference. Please check the website or contact Class Counsel if you wish to confirm that the hearing time has not been changed and to determine if the hearing is occurring in person or by video or teleconference.

18. Do I have to attend the Fairness Hearing?

No; however, you are welcome to attend at your own expense. If you file an objection to the Settlement, you do not have to go to Court to talk about it. As long as your objection is filed or postmarked by October 31, 2024 and you comply with the requirements in the answer to question 16 above, the Court will consider it. You may also send your own lawyer at your expense to attend the Fairness Hearing.

19. May I speak at the Fairness Hearing?

You may ask the Court for permission to speak at the hearing. Anyone wishing to appear must state in their written objection their intention to appear at the Fairness Hearing, at their own expense.

Objectors or their attorneys intending to participate at the Fairness Hearing must file a notice of intention to participate (and, if applicable, the name, address, and telephone number of the objector's attorney) with the Court no later than November 14, 2024. Any objectors, or their counsel, who do not timely file a notice of intention to participate in accordance with this Paragraph shall not be permitted to speak at the Fairness Hearing, except for good cause shown.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

IF YOU DO NOTHING AND THE COURT APPROVES OF THE SETTLEMENT, YOU AND ALL OTHER CLASS MEMBERS WILL BE BOUND BY THE JUDGMENT AND SETTLEMENT AGREEMENT, INCLUDING THE RELEASE OF CLAIMS. If you are a Current Participant or a Beneficiary or Alternate Payee of a Current Participant with an Active Account in the Plan, you do not need to take any action to be eligible to receive the Settlement benefits. If you are a Former Participant or a Beneficiary or Alternate Payee of a Former Participant and you do not have an Active Account in the Plan, you must submit a Former Participant Claim Form by the submission deadline or you will not receive any of the settlement payments described above in answer to questions 7 and 8.

DATED: June 24, 2024

**THIS NOTICE HAS BEEN SENT TO YOU BY ORDER OF
THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA.**

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Former Participant Claim Form

If you were a participant in a defined contribution 401(k) retirement plan known as the IQVIA 401(k) Plan, formerly known as the Quintiles 401(k) Plan (the “Plan”), on or after June 23, 2014 through May 24, 2024 (the “Class Period”), but you do not have an Active Account with the Plan, or are a Beneficiary or Alternate Payee (in the case of a person subject to a Qualified Domestic Relations Order) of a Former Participant, and would like to receive a payment from the *Dearing, et al. v. IQVIA Inc., et al.* Settlement, you must complete the form below and mail it to IQVIA 401(k) Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson Street, Suite 205, Media, PA 19063 to be received NO LATER THAN SEPTEMBER 23, 2024.

“Active Account” means an individual investment account in the Plan with a balance greater than \$0 as of May 24, 2024. “Former Participant” means a person who had an Active Account with a positive balance in the Plan during the Class Period but who did not have an account with the Plan with a balance greater than \$0 as of May 24, 2024. “Beneficiary” or “Alternate Payee” means, for the purposes of this Former Participant Claim Form, a Beneficiary or Alternate Payee of a participant in the Plan who maintained a positive account balance in the Plan during the Class Period, but did not have an active account in the Plan as of May 24, 2024.

Participant Information

Name		
Address		
Address 2		
City	State	Zip
Participant’s Social Security Number	Phone (Preferred)	Phone (Alternate)
Participant’s Date of Birth		
Email Address		

Beneficiary or Alternate Payee Information (ONLY PROVIDE IF THIS PERSON SHOULD RECEIVE PAYMENT INSTEAD OF THE PARTICIPANT)

Your Name		
Address		
Address 2		
City	State	Zip
Your Social Security Number	Phone (Preferred)	Phone (Alternate)
Your Date of Birth		
Email Address		

Payment Election (choose only one)

I WANT A CHECK MADE PAYABLE TO ME AND MAILED TO ME. Choosing this option entails the Settlement Administrator withholding 20% or more of your total payment for tax withholdings. The Settlement Administrator will mail your check to the Name and Address listed above.

OR

I WANT A CHECK MADE PAYABLE TO MY RETIREMENT ACCOUNT AS A ROLLOVER DISTRIBUTION. PLEASE MAKE THE CHECK PAYABLE TO:

Plan/Employer Name	
Account Name	
Account Number	
Contact or Trustee (if required)	
Address Line 1	
Address Line 2	
City, State, Zip	

NOTE: There is no promise or assurance that these funds are eligible for rollover or tax-preferred treatment. The decision to seek rollover treatment is yours alone. Any questions about taxation or rollover treatment must be directed to your tax advisor or accountant. No one associated with this case can provide you with assistance or advice of any kind in this regard or answer any tax questions.

Required Certification Regarding Qualified Domestic Relations Order (“QDRO”): I hereby certify and represent under penalty of perjury that no portion of the payment to be received hereunder is subject to a QDRO, or, that a true, accurate, and current copy of any applicable QDRO is attached hereto along with the name and address of any payee other than the Class Member. Payment will be made in accordance with any QDRO supplied.

Signature (Required): _____ **Date:** _____

Deceased Class Members

Deceased Class Members are not eligible for rollover treatment. A Beneficiary of a deceased person who was a participant in the Plan at any time during the Class Period, including executors, heirs, assigns, estates, personal representatives, or successors-in-interest, must provide the following information with this Former Participant Claim Form to IQVIA 401(k) Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson Street, Suite 205, Media PA 19063:

- Death certificate and evidence that such person is authorized to receive distribution of the deceased Class Member’s settlement payment and the name and, if applicable, the percentage of distribution each person is entitled to receive;
- Social Security Number of each person entitled to receive payment;
- Current mailing address of each person entitled to receive payment; and
- Person(s) to whom check(s) should be made payable, and amount(s) of check(s).

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IQVIA 401(k) Settlement Administrator
c/o Strategic Claims Services
600 North Jackson Street, Suite 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

Mail ID
Name
Address
City, State Zip

EXHIBIT D

Re: IQVIA 401k Class Action Settlement

You are receiving this email from Strategic Claims Services because we are the Settlement Administrator for the above-referenced litigation.

If you were a participant in a defined contribution 401(k) retirement plan known as the IQVIA 401(k) Plan, formerly known as the Quintiles 401(k) Plan, on or after June 23, 2014 through May 24, 2024, you could receive a payment and your legal rights will be affected by this class action settlement.

The case is called *Dearing, et al. v. IQVIA Inc., et al.*, Case No. 1:20-cv-00574-WO-JEP in the United States District Court for the Middle District of North Carolina. A Court authorized this Notice. This is not a solicitation from a lawyer.

This Notice advises you of the settlement (the “Settlement”) of a lawsuit against IQVIA Inc., the Board of Directors of IQVIA Holdings Inc., the Benefits Investment Committee, and Does No. 1-20 (collectively, “Defendants”). In the lawsuit, Plaintiffs, Darya Dearing, Janice Gullick, Nelson Sievers, and Lauren Brown, (collectively, “Plaintiffs,” and with Defendants, the “Parties”), allege that Defendants violated the Employee Retirement Income Security Act (“ERISA”) in the administration of the IQVIA 401(k) Plan, formerly known as the Quintiles 401(k) Plan (the “Plan”). Defendants deny the allegations and deny that they engaged in any improper conduct. You should read the entire notice carefully because your legal rights will be affected, whether you act or not. Your rights and options, and the deadline for you to object if you are opposed to the Settlement, are explained in the Notice.

For more details regarding the proposed settlement, please review the Notice at the following link:

strategicclaims.net/iqv401k/notice

Please note if you are a Participant with an Active Account in the IQVIA 401(k) Plan formerly know as the Quintiles 401(k) Plan, with a positive balance greater than \$0 as of May 24, 2024, you do not need to take any action to receive payment under the Settlement.

Sincerely,

IQVIA 401k Settlement Administrator
c/o Strategic Claims Services
600 N Jackson St - Suite 205
Media, PA 19063
info@strategicclaims.net
toll-free at 866-274-4004

If you would like to unsubscribe from future email communications regarding this case, please click the link below. We (Strategic Claims Services) are the administrator for this case, and we were provided your information because you were identified as a potential class member. Your information will only be used to provide you with communications regarding this case and not for any other purpose. Strategic Claims Services is located at P.O. Box 230, Media, PA 19063.

Unsubscribing from emails regarding this case does not remove you from the class list and you may still receive communications via regular mail as required by the court. Unsubscribing from emails is not the same as opting out or excluding yourself from the case. Please refer to the information you received about the case for more information regarding that process.

I have read the above and would like to unsubscribe from future email communications regarding this case.

EXHIBIT E

Re: IQVIA 401k Class Action Settlement

You are receiving this email from Strategic Claims Services because we are the Settlement Administrator for the above-referenced litigation.

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For more details regarding the proposed settlement, please review the Notice at the following link:

strategicclaims.net/iqvia401k/notice

You can review additional documents pertinent to the settlement, including a Former Participant Claim Form, which you may need to complete in order to receive an allocation of proceeds from the Settlement, at:

strategicclaims.net/iqvia401k

Sincerely,

IQVIA 401k Settlement Administrator
c/o Strategic Claims Services
600 N Jackson St - Suite 205
Media, PA 19063
info@strategicclaims.net
toll-free at 866-274-4004

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