

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817  
Case No. 18-cv-00864

Honorable Rebecca R. Pallmeyer

SUPPLEMENTAL DECLARATION OF MICHAEL A. WILLIAMS, PH.D.

February 16, 2026

## I. INTRODUCTION

1. My name is Michael A. Williams. I am a managing director at Berkeley Research Group LLC, headquartered at 2200 Powell Street, Suite 1200, Emeryville, CA 94608.

2. I previously submitted expert reports and a declaration on behalf of the Dealership Class Plaintiffs (“Dealership Plaintiffs” or “Plaintiffs”) in this matter related to merits issues on August 26, 2019 (Dkt 975-79) and December 19, 2019 (Dkt 975-80); and class certification issues on November 21, 2023 (Dkt 1426), April 12, 2024 (Dkt 1479-1), June 10, 2024 (Dkt 1514), and June 14, 2024 (Dkt 1517). I also submitted a declaration related to settlement allocation on January 28, 2026 (Dkt 1569).<sup>1</sup>

3. CDK Global, LLC (“CDK”) and The Reynolds and Reynolds Company (“Reynolds”) (collectively, “Defendants”) each have settlement agreements with Dealership Plaintiffs.

4. I understand from counsel for Plaintiffs (“Plaintiffs’ Counsel”) that a CDK settlement class has been defined (hereinafter the “CDK Settlement Class”) as follows:

All persons and entities located in the United States engaged in the business of the retail sale of automobiles who purchased DMS from CDK and/or Reynolds, or any predecessor, successor, subsidiary, joint venture or affiliate, during the period from September 1, 2013 through August 15, 2024 (“CDK Settlement Class Period”).<sup>2</sup>

5. I understand from Plaintiffs’ Counsel that a Reynolds settlement class has been defined (hereinafter the “Reynolds Settlement Class”) as follows:

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<sup>1</sup> Declaration of Michael A. Williams, Ph.D., January 28, 2026 (hereinafter “Williams Declaration” or “Declaration”).

<sup>2</sup> Settlement Agreement Between the Dealership Class and CDK, *In re: Dealer Management Systems Antitrust Litigation*, United States District Court for the Northern District of Illinois, Eastern Division, MDL No. 2817, Case No. 18-cv-00864, August 16, 2024, p. 4.

All persons and entities located in the United States engaged in the business of the retail sale of automobiles who purchased DMS from CDK and/or Reynolds, or any predecessor, successor, subsidiary, joint venture or affiliate, during the period from January 1, 2015 through October 23, 2018 (“Reynolds Settlement Class Period”).<sup>3</sup>

6. I understand from Plaintiffs’ Counsel that being a member of the Reynolds Settlement Class or CDK Settlement Class does not depend on which Defendant’s DMS a Class Member used. If a qualified rooftop used a Reynolds and/or CDK DMS during both Settlement Class Periods, it can be a member of both Settlement Classes. I refer to the Reynolds Settlement Class and CDK Settlement Class collectively as the “Settlement Classes” and members of either or both Settlement Classes as “Settlement Class Members.”

7. As explained in my Declaration, “[t]here are 7,373 unique rooftops with approved claims in the Settlement Classes. Of these 7,373 rooftops, 166 requested exclusion from the Reynolds Settlement Class.<sup>4</sup> Of the 7,373 rooftops, 33 do not qualify for any funds from the settlements because, in the Settlement Class Periods, they only claimed usage of DMS from CDK prior to March 2015, for which period my analysis found no overcharge for rooftops that used a CDK DMS.”<sup>5</sup>

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<sup>3</sup> Settlement Agreement Between the Dealership Class and Reynolds, *In re: Dealer Management Systems Antitrust Litigation*, United States District Court for the Northern District of Illinois, Eastern Division, MDL No. 2817, Case No. 18-cv-00864, October 23, 2018, p. 3.

<sup>4</sup> Out of the 166 rooftops that opted out of the Reynolds Settlement Class, settlement fund allocations were directly affected for 146 rooftops, which would otherwise receive a share of the Reynolds Settlement fund. Settlement fund allocations for the other 20 rooftops were not directly affected because they do not have approved claims in the Reynolds Settlement Class Period and thus would not receive a share of the Reynolds Settlement fund even if they did not opt out of the Reynolds Settlement Class. All these 166 rooftops have approved claims in the CDK Settlement Class Period and will receive a share of the CDK Settlement fund.

<sup>5</sup> Williams Declaration, ¶ 7 citing Expert Class Certification Reply Report of Michael A. Williams, Ph.D. (April 12, 2024), Dkt 1479-1, p. 204 (hereinafter “Williams Class Reply Report” or “Class Reply Report”), Table 16.

8. I explained how Settlement fund allocation shares were calculated for any given rooftop for each Settlement fund in my Declaration. In this supplemental declaration, I provide additional details on how the allocation share for each Settlement fund differs based on the DMS used by a rooftop, the number of approved claim for a given DMS used by rooftops for a given month, the months a rooftop has approved claims, and whether a rooftop has opted out of the Reynolds Settlement.

## II. DETERMINATION OF SETTLEMENT FUND ALLOCATION SHARE

9. To calculate the allocation of settlement funds to Settlement Class Members, I followed the settlement allocation plan filed on August 16, 2024 (hereinafter “Allocation Plan”).<sup>6</sup> As explained in the Allocation Plan, the “Allocation Plan [] awards each Settlement Class Member its *pro rata* share of the available Settlement Funds *based on the estimated damages applicable to the period the Class Member used a Reynolds and/or CDK DMS.*”<sup>7</sup> That is, rooftops with approved claims would not necessarily be awarded the same share of the Settlement funds. Instead, shares of a given Settlement fund received by rooftops depend on the DMS used and the damages applicable to the DMS used.

10. Calculations of Settlement fund allocation shares follow the same steps for CDK Settlement fund and for Reynolds Settlement fund and are performed completely independently.<sup>8</sup> For ease of discussion, I primarily use the allocation of the CDK Settlement fund as an example.

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<sup>6</sup> Dealership Class Plaintiffs’ Allocation Plan, *In re: Dealer Management Systems Antitrust Litigation*, United States District Court for the Northern District of Illinois, Eastern Division, MDL No. 2817, Case No. 18-cv-00864, August 16, 2024 (hereinafter “Allocation Plan”).

<sup>7</sup> Allocation Plan, p. 2 (emphasis added).

<sup>8</sup> The only exception is that for the Reynolds Settlement fund, I perform an extra step in the beginning to exclude the 166 rooftops that opted out of the Reynolds Settlement Class. I understand from Plaintiffs’ Counsel that these rooftops should not receive any share of the Reynolds Settlement fund.

11. As shown in my Class Reply Report, damages applicable to Class Members vary (1) by CDK versus Reynolds DMS used and (2) over time.<sup>9</sup> Thus, following the Allocation Plan,<sup>10</sup> I calculate the total share of funds allocated to a given month for a given DMS used for the CDK Settlement Fund based on total damages for the CDK Settlement Class Period of September 1, 2013 through August 15, 2024.<sup>11</sup> These total shares by month and by DMS used are reported in Columns (B) and (E) in Exhibit A of this supplemental declaration. Note that no share is allocated to CDK DMS used for months before March 2015 because no overcharge for rooftops that used a CDK DMS was found in those months.<sup>12</sup>

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<sup>9</sup> See Williams Class Reply Report, Table 16. As explained in my Declaration: “Damages equal (a) actual DIS fees paid by vendors multiplied by (b) the product of the overcharge percentage and pass-through rate divided by (c)  $(1 + \text{overcharge percentage} \times \text{pass-through rate})$ .” Williams Declaration, footnote 10 citing Expert Class Certification Report of Michael A. Williams, Ph.D. (November 21, 2023) (hereinafter “Williams Class Report”), Dkt 1426, ¶ 147. DIS fees are data integration service fees, which are the relevant volume of commerce on which Class Members were overcharged. Since actual DIS fees differ by month and across CDK versus Reynolds DMS used, the shares of damages differ by month and by DMS used.

<sup>10</sup> Allocation Plan, p. 2.

<sup>11</sup> That is, as explained in my Declaration: “I calculate the total share of the settlement funds available for allocation for each month-DMS combination based on the share of damages.” Williams Declaration, ¶ 12.

Data for CDK monthly DIS fees is not available after September 2023, I use the standard linear extrapolation method to estimate the monthly DIS fees for the period October 2023 through August 2024. I then multiply the August 2024 DIS fees by 15/31 to reflect the fact that the CDK Settlement Class Period ends on August 15, 2024.

For the Reynolds Settlement fund allocation, the Reynolds Settlement Class Period is January 1, 2015 through October 23, 2018. Damages shares, which are used as the Settlement fund shares, for a given month for a given DMS used are calculated as the share of total damages in the Reynolds Settlement Class Period. Months outside of the Reynolds Settlement Class Period, i.e., before January 2015 or after October 2018, do not receive any share of the Reynolds Settlement fund. October 2018 damages are multiplied by 23/31 to reflect the fact that Reynolds Settlement Class Period ends on October 23, 2018.

<sup>12</sup> Williams Class Reply Report, Table 16.

12. I then calculate the total number of rooftops with approved claims for each month for each DMS used, which are reported in Columns (C) and (F) in Exhibit A.<sup>13</sup>

13. Next, I calculate the share of a settlement fund allocated to *each* rooftop with approved claims in a given month for a given DMS used as the ratio of (1) total shares of the settlement fund across all rooftops in a given month for a given DMS used over (2) the number of rooftops with approved claims in a given month for a given DMS used. These individual rooftop shares are reported in Columns (D) and (G) in Exhibit A.<sup>14</sup>

14. A hypothetical example using dollars instead of shares may help explain the calculations. Suppose we are looking at a given month, say January 2019, for the allocation of CDK Settlement Fund.<sup>15</sup> Consider damages for January 2019 for CDK and Reynolds DMS users as shares of total damages in the CDK Settlement Class Period. Suppose based on those damages shares, the CDK Settlement Fund dollars allocated to CDK DMS users for January 2019 equal \$400,000, while the total CDK Settlement Fund dollars allocated to Reynolds DMS users for January 2019 equal \$600,000. Suppose that in January 2019, there are 4,000 CDK rooftops and 2,000 Reynolds rooftops with approved claims. Then in January 2019, a rooftop that used a CDK DMS will be awarded \$100 (i.e., \$400,000 divided by 4,000), and a rooftop that used a Reynolds DMS will be awarded \$300 (i.e., \$600,000 divided by 2,000).

15. The total share of the CDK Settlement Fund allocated to a given rooftop equals the sum of shares across all the month-DMS combinations for which the rooftop has approved claims.

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<sup>13</sup> For Reynolds Settlement fund allocation, this excludes the 166 rooftops that opted out of the Reynolds Settlement Class in Columns (C) and (F) in Exhibit B.

<sup>14</sup> Allocation Plan, pp. 2-3.

<sup>15</sup> Note that January 2019 is outside of the Reynolds Settlement Class Period and thus claims in this month receive no share of the Reynolds Settlement fund.

For example, suppose a rooftop used a Reynolds DMS before January 2019 and used a CDK DMS for January 2019 and later. Further suppose that the rooftop has approved claims for the period January 2014 through December 2020. In this case, the rooftop receives (1) the sum of shares in Column (G) of Exhibit A for the months January 2014 through December 2019, plus (2) the sum of shares in Column (D) of Exhibit A for the months January 2019 through December 2020. The total share a rooftop receives from the CDK Settlement fund is reported in the Column “CDK Settlement Funds Share” in Exhibit D of my Declaration.<sup>16</sup>

16. The calculation steps discussed above explain why (1) a rooftop that used a CDK DMS for the entire CDK Settlement Class Period (e.g., the rooftop with tracking number 10222) and (2) a rooftop used a Reynolds DMS for the entire CDK Settlement Class Period (e.g., the rooftop with tracking number 21070) are allocated different shares of the CDK Settlement fund. The explanation is twofold. First, the total shares allocated to a CDK DMS user versus a Reynolds DMS user differ each month based on the damages shares by DMS used. Second, the number of rooftops with approved claims in each month differs between rooftops that used CDK versus Reynolds DMS.

17. The Reynolds Settlement fund allocation follows the same steps. The shares allocated to each rooftop with approved claims in a given month for a given DMS used are reported in Columns (D) and (G) in Exhibit B.

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<sup>16</sup> Note that numbers in all exhibits are reported rounded while the accurate numbers are used in calculations. Thus, for a given rooftop, if one were to sum the rounded month-DMS combination shares reported in Exhibit A, it may appear to be slightly different from the values reported in Exhibit D of my Declaration.

February 16, 2026

*Michael A. Williams*

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Michael A. Williams

EXHIBIT A  
SHARE OF CDK SETTLEMENT FUNDS ALLOCATED TO CDK AND REYNOLDS ROOFTOP BY MONTH

ID	Column Name	Description
(A)	Month	The month and year of the CDK Settlement Class Period.
(B)	Share of CDK Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the CDK Settlement Class Period	Based on the estimated monthly damages for CDK DMS used, this is the share of the CDK settlement fund allocated to <i>all</i> rooftops that used CDK DMS and have an approved claim for the given month.
(C)	Number of CDK Rooftops approved for CDK Settlement Fund	This is the total number of rooftops that used CDK DMS and have an approved claim for the given month.
(D)	Share of CDK Settlement Fund per CDK Rooftop	This is the share of the CDK settlement fund allocated to a single rooftop that used CDK DMS and has an approved claim for the given month, i.e., $(D) = (B)/(C)$ .
(E)	Share of CDK Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the CDK Settlement Class Period	Based on the estimated monthly damages for Reynolds DMS used, this is the share of the CDK settlement fund allocated to <i>all</i> rooftops that used Reynolds DMS and have an approved claim for the given month.
(F)	Number of Reynolds Rooftops approved for CDK Settlement Fund	This is the total number of rooftops that used Reynolds DMS and have an approved claim for the given month.
(G)	Share of CDK Settlement Fund per Reynolds Rooftop	This is the share of the CDK settlement fund allocated to a single rooftop that used Reynolds DMS and has an approved claim for the given month, i.e., $(G) = (E)/(F)$ .

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of CDK Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of CDK Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per CDK Rooftop	Share of CDK Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of Reynolds Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per Reynolds Rooftop
Sep-2013	0.00000%	2,332	0.00000%	0.08213%	892	0.00009%
Oct-2013	0.00000%	2,347	0.00000%	0.09411%	901	0.00010%
Nov-2013	0.00000%	2,373	0.00000%	0.09471%	903	0.00010%
Dec-2013	0.00000%	2,424	0.00000%	0.09620%	908	0.00011%
Jan-2014	0.00000%	2,466	0.00000%	0.10095%	925	0.00011%
Feb-2014	0.00000%	2,482	0.00000%	0.10274%	927	0.00011%
Mar-2014	0.00000%	2,497	0.00000%	0.10594%	931	0.00011%
Apr-2014	0.00000%	2,519	0.00000%	0.10845%	976	0.00011%
May-2014	0.00000%	2,569	0.00000%	0.11019%	984	0.00011%
Jun-2014	0.00000%	2,589	0.00000%	0.11739%	991	0.00012%
Jul-2014	0.00000%	2,602	0.00000%	0.11193%	1,004	0.00011%
Aug-2014	0.00000%	2,629	0.00000%	0.12030%	1,555	0.00008%
Sep-2014	0.00000%	2,661	0.00000%	0.12388%	1,560	0.00008%
Oct-2014	0.00000%	2,706	0.00000%	0.12401%	1,572	0.00008%
Nov-2014	0.00000%	2,742	0.00000%	0.12676%	1,589	0.00008%
Dec-2014	0.00000%	2,774	0.00000%	0.12769%	1,596	0.00008%
Jan-2015	0.00000%	2,786	0.00000%	0.13418%	1,623	0.00008%
Feb-2015	0.00000%	2,806	0.00000%	0.13828%	1,632	0.00008%
Mar-2015	0.08841%	2,824	0.00003%	0.26859%	1,646	0.00016%
Apr-2015	0.09047%	2,840	0.00003%	0.27524%	1,660	0.00017%
May-2015	0.09170%	2,846	0.00003%	0.27758%	1,662	0.00017%
Jun-2015	0.09364%	2,868	0.00003%	0.28214%	1,669	0.00017%

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of CDK Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of CDK Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per CDK Rooftop	Share of CDK Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of Reynolds Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per Reynolds Rooftop
Jul-2015	0.09501%	2,874	0.00003%	0.28786%	1,673	0.00017%
Aug-2015	0.09584%	2,884	0.00003%	0.30785%	1,683	0.00018%
Sep-2015	0.13432%	2,886	0.00005%	0.32259%	1,699	0.00019%
Oct-2015	0.13766%	2,898	0.00005%	0.32828%	1,709	0.00019%
Nov-2015	0.13922%	2,937	0.00005%	0.33523%	1,728	0.00019%
Dec-2015	0.15006%	2,966	0.00005%	0.34120%	1,755	0.00019%
Jan-2016	0.15500%	2,980	0.00005%	0.35457%	1,766	0.00020%
Feb-2016	0.16302%	3,003	0.00005%	0.36362%	1,769	0.00021%
Mar-2016	0.16483%	3,012	0.00005%	0.37070%	1,770	0.00021%
Apr-2016	0.16910%	3,022	0.00006%	0.37062%	1,781	0.00021%
May-2016	0.17653%	3,033	0.00006%	0.37684%	1,787	0.00021%
Jun-2016	0.24110%	3,045	0.00008%	0.38158%	1,796	0.00021%
Jul-2016	0.29622%	3,043	0.00010%	0.38317%	1,798	0.00021%
Aug-2016	0.29988%	3,057	0.00010%	0.38651%	1,802	0.00021%
Sep-2016	0.31234%	3,071	0.00010%	0.40207%	1,799	0.00022%
Oct-2016	0.31537%	3,075	0.00010%	0.41982%	1,804	0.00023%
Nov-2016	0.31924%	3,089	0.00010%	0.44341%	1,806	0.00025%
Dec-2016	0.35217%	3,098	0.00011%	0.44536%	1,814	0.00025%
Jan-2017	0.35653%	3,110	0.00011%	0.45019%	1,814	0.00025%
Feb-2017	0.36718%	3,142	0.00012%	0.45264%	1,818	0.00025%
Mar-2017	0.34771%	3,156	0.00011%	0.46004%	1,816	0.00025%
Apr-2017	0.35588%	3,161	0.00011%	0.45866%	1,834	0.00025%
May-2017	0.37339%	3,165	0.00012%	0.48177%	1,829	0.00026%

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of CDK Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of CDK Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per CDK Rooftop	Share of CDK Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of Reynolds Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per Reynolds Rooftop
Jun-2017	0.37400%	3,185	0.00012%	0.47293%	1,831	0.00026%
Jul-2017	0.40679%	3,189	0.00013%	0.47216%	1,815	0.00026%
Aug-2017	0.41258%	3,203	0.00013%	0.50497%	1,816	0.00028%
Sep-2017	0.41191%	3,215	0.00013%	0.50661%	1,826	0.00028%
Oct-2017	0.42194%	3,216	0.00013%	0.50856%	1,824	0.00028%
Nov-2017	0.43043%	3,221	0.00013%	0.51076%	1,786	0.00029%
Dec-2017	0.43178%	3,228	0.00013%	0.51335%	1,785	0.00029%
Jan-2018	0.43481%	3,226	0.00013%	0.51366%	1,787	0.00029%
Feb-2018	0.44272%	3,245	0.00014%	0.51757%	1,783	0.00029%
Mar-2018	0.44775%	3,261	0.00014%	0.51588%	1,779	0.00029%
Apr-2018	0.45045%	3,258	0.00014%	0.51868%	1,768	0.00029%
May-2018	0.45486%	3,268	0.00014%	0.51074%	1,768	0.00029%
Jun-2018	0.46442%	3,298	0.00014%	0.51710%	1,764	0.00029%
Jul-2018	0.47067%	3,305	0.00014%	0.50990%	1,762	0.00029%
Aug-2018	0.47266%	3,323	0.00014%	0.53037%	1,747	0.00030%
Sep-2018	0.45486%	3,323	0.00014%	0.53075%	1,743	0.00030%
Oct-2018	0.47114%	3,325	0.00014%	0.52411%	1,739	0.00030%
Nov-2018	0.54537%	3,334	0.00016%	0.52278%	1,722	0.00030%
Dec-2018	0.49245%	3,341	0.00015%	0.51980%	1,725	0.00030%
Jan-2019	0.47133%	3,361	0.00014%	0.51925%	1,722	0.00030%
Feb-2019	0.42618%	3,366	0.00013%	0.52006%	1,705	0.00031%
Mar-2019	0.43316%	3,359	0.00013%	0.51883%	1,697	0.00031%
Apr-2019	0.43632%	3,374	0.00013%	0.52274%	1,691	0.00031%

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of CDK Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of CDK Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per CDK Rooftop	Share of CDK Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of Reynolds Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per Reynolds Rooftop
May-2019	0.44418%	3,370	0.00013%	0.52494%	1,683	0.00031%
Jun-2019	0.44676%	3,402	0.00013%	0.52627%	1,670	0.00032%
Jul-2019	0.44433%	3,405	0.00013%	0.52375%	1,669	0.00031%
Aug-2019	0.44351%	3,408	0.00013%	0.54374%	1,695	0.00032%
Sep-2019	0.44003%	3,459	0.00013%	0.53921%	1,671	0.00032%
Oct-2019	0.43249%	3,471	0.00012%	0.51472%	1,602	0.00032%
Nov-2019	0.43161%	3,481	0.00012%	0.52024%	1,601	0.00032%
Dec-2019	0.43532%	3,486	0.00012%	0.51161%	1,602	0.00032%
Jan-2020	0.43574%	3,413	0.00013%	0.50850%	1,607	0.00032%
Feb-2020	0.43007%	3,429	0.00013%	0.50964%	1,588	0.00032%
Mar-2020	0.42904%	3,443	0.00012%	0.50975%	1,582	0.00032%
Apr-2020	0.42431%	3,443	0.00012%	0.50449%	1,566	0.00032%
May-2020	0.41601%	3,457	0.00012%	0.47700%	1,560	0.00031%
Jun-2020	0.41584%	3,495	0.00012%	0.50473%	1,556	0.00032%
Jul-2020	0.40334%	3,491	0.00012%	0.48939%	1,553	0.00032%
Aug-2020	0.39500%	3,520	0.00011%	0.50679%	1,554	0.00033%
Sep-2020	0.38615%	3,516	0.00011%	0.50575%	1,547	0.00033%
Oct-2020	0.38206%	3,533	0.00011%	0.50284%	1,541	0.00033%
Nov-2020	0.38434%	3,541	0.00011%	0.49361%	1,535	0.00032%
Dec-2020	0.38242%	3,538	0.00011%	0.48694%	1,533	0.00032%
Jan-2021	0.37862%	3,531	0.00011%	0.48569%	1,534	0.00032%
Feb-2021	0.37241%	3,548	0.00010%	0.48462%	1,528	0.00032%
Mar-2021	0.37140%	3,576	0.00010%	0.48191%	1,520	0.00032%

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of CDK Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of CDK Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per CDK Rooftop	Share of CDK Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of Reynolds Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per Reynolds Rooftop
Apr-2021	0.36956%	3,574	0.00010%	0.48546%	1,511	0.00032%
May-2021	0.37182%	3,590	0.00010%	0.48827%	1,508	0.00032%
Jun-2021	0.34595%	3,568	0.00010%	0.48230%	1,503	0.00032%
Jul-2021	0.34579%	3,584	0.00010%	0.48162%	1,494	0.00032%
Aug-2021	0.33348%	3,571	0.00009%	0.48041%	1,510	0.00032%
Sep-2021	0.33057%	3,631	0.00009%	0.47859%	1,501	0.00032%
Oct-2021	0.32503%	3,653	0.00009%	0.47648%	1,487	0.00032%
Nov-2021	0.32347%	3,665	0.00009%	0.47731%	1,489	0.00032%
Dec-2021	0.32631%	3,720	0.00009%	0.47505%	1,486	0.00032%
Jan-2022	0.32480%	3,724	0.00009%	0.47143%	1,479	0.00032%
Feb-2022	0.32312%	3,728	0.00009%	0.47153%	1,471	0.00032%
Mar-2022	0.31722%	3,737	0.00008%	0.47082%	1,471	0.00032%
Apr-2022	0.31395%	3,742	0.00008%	0.47381%	1,472	0.00032%
May-2022	0.30943%	3,756	0.00008%	0.47083%	1,460	0.00032%
Jun-2022	0.30408%	3,778	0.00008%	0.47153%	1,460	0.00032%
Jul-2022	0.29864%	3,780	0.00008%	0.47211%	1,460	0.00032%
Aug-2022	0.29578%	3,794	0.00008%	0.49320%	1,484	0.00033%
Sep-2022	0.29517%	3,810	0.00008%	0.48392%	1,478	0.00033%
Oct-2022	0.29428%	3,813	0.00008%	0.50113%	1,468	0.00034%
Nov-2022	0.29668%	3,836	0.00008%	0.52271%	1,466	0.00036%
Dec-2022	0.29380%	3,876	0.00008%	0.50367%	1,458	0.00035%
Jan-2023	0.29124%	3,867	0.00008%	0.50445%	1,450	0.00035%
Feb-2023	0.29329%	3,879	0.00008%	0.50731%	1,444	0.00035%

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of CDK Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of CDK Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per CDK Rooftop	Share of CDK Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the CDK Settlement Class Period	Number of Reynolds Rooftops approved for CDK Settlement Fund	Share of CDK Settlement Fund per Reynolds Rooftop
Mar-2023	0.40650%	4,004	0.00010%	0.50460%	1,443	0.00035%
Apr-2023	0.40128%	4,010	0.00010%	0.50864%	1,412	0.00036%
May-2023	0.40457%	4,015	0.00010%	0.50882%	1,410	0.00036%
Jun-2023	0.40354%	4,031	0.00010%	0.50892%	1,414	0.00036%
Jul-2023	0.40651%	4,035	0.00010%	0.50920%	1,418	0.00036%
Aug-2023	0.40871%	4,037	0.00010%	0.49458%	1,451	0.00034%
Sep-2023	0.41394%	4,037	0.00010%	0.49804%	1,277	0.00039%
Oct-2023	0.41916%	3,561	0.00012%	0.56613%	1,120	0.00051%
Nov-2023	0.42438%	3,540	0.00012%	0.63423%	1,099	0.00058%
Dec-2023	0.42960%	3,536	0.00012%	0.70232%	1,070	0.00066%
Jan-2024	0.43483%	3,506	0.00012%	0.77042%	1,051	0.00073%
Feb-2024	0.44005%	3,496	0.00013%	0.83851%	1,030	0.00081%
Mar-2024	0.44527%	3,489	0.00013%	0.90660%	1,031	0.00088%
Apr-2024	0.45050%	3,469	0.00013%	0.97470%	1,018	0.00096%
May-2024	0.45572%	3,432	0.00013%	1.04279%	1,012	0.00103%
Jun-2024	0.46094%	3,419	0.00013%	1.11088%	1,005	0.00111%
Jul-2024	0.46617%	3,377	0.00014%	1.17898%	1,011	0.00117%
Aug-2024	0.22809%	3,335	0.00007%	0.60342%	1,015	0.00059%

## EXHIBIT B

## SHARE OF REYNOLDS SETTLEMENT FUNDS ALLOCATED TO CDK AND REYNOLDS ROOFTOP BY MONTH

ID	Column Name	Description
(A)	Month	The month and year of the Reynolds Settlement Class Period.
(B)	Share of Reynolds Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Based on the estimated monthly damages for CDK DMS used, this is the share of the Reynolds settlement fund allocated to <i>all</i> rooftops that used CDK DMS and have an approved claim for the given month.
(C)	Number of CDK Rooftops approved for Reynolds Settlement Fund	This is the total number of rooftops that used CDK DMS and have an approved claim for the given month, excluding rooftops that opted out of the Reynolds settlement.
(D)	Share of Reynolds Settlement Fund per CDK Rooftop	This is the share of the Reynolds settlement fund allocated to a single rooftop that used CDK DMS and has an approved claim for the given month, i.e., $(D) = (B)/(C)$ .
(E)	Share of Reynolds Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Based on the estimated monthly damages for Reynolds DMS used, this is the share of the Reynolds settlement fund allocated to <i>all</i> rooftops that used Reynolds DMS and have an approved claim for the given month.
(F)	Number of Reynolds Rooftops approved for Reynolds Settlement Fund	This is the total number of rooftops that used Reynolds DMS and have an approved claim for the given month, excluding rooftops that opted out of the Reynolds settlement.
(G)	Share of Reynolds Settlement Fund per Reynolds Rooftop	This is the share of the Reynolds settlement fund allocated to a single rooftop that used Reynolds DMS and has an approved claim for the given month, i.e., $(G) = (E)/(F)$ .

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of Reynolds Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of CDK Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per CDK Rooftop	Share of Reynolds Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of Reynolds Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per Reynolds Rooftop
Sep-2013	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Oct-2013	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Nov-2013	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Dec-2013	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Jan-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Feb-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Mar-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Apr-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
May-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Jun-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Jul-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Aug-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Sep-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Oct-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Nov-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Dec-2014	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Jan-2015	0.00000%	2,732	0.00000%	0.41856%	1,556	0.00027%
Feb-2015	0.00000%	2,752	0.00000%	0.43135%	1,565	0.00028%
Mar-2015	0.27578%	2,770	0.00010%	0.83784%	1,579	0.00053%
Apr-2015	0.28221%	2,784	0.00010%	0.85858%	1,593	0.00054%
May-2015	0.28605%	2,790	0.00010%	0.86589%	1,595	0.00054%
Jun-2015	0.29211%	2,812	0.00010%	0.88012%	1,602	0.00055%

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of Reynolds Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of CDK Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per CDK Rooftop	Share of Reynolds Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of Reynolds Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per Reynolds Rooftop
Jul-2015	0.29638%	2,816	0.00011%	0.89794%	1,606	0.00056%
Aug-2015	0.29897%	2,826	0.00011%	0.96031%	1,616	0.00059%
Sep-2015	0.41898%	2,829	0.00015%	1.00627%	1,632	0.00062%
Oct-2015	0.42942%	2,841	0.00015%	1.02403%	1,638	0.00063%
Nov-2015	0.43429%	2,879	0.00015%	1.04572%	1,657	0.00063%
Dec-2015	0.46810%	2,907	0.00016%	1.06432%	1,684	0.00063%
Jan-2016	0.48350%	2,920	0.00017%	1.10604%	1,694	0.00065%
Feb-2016	0.50854%	2,943	0.00017%	1.13427%	1,696	0.00067%
Mar-2016	0.51416%	2,952	0.00017%	1.15638%	1,697	0.00068%
Apr-2016	0.52748%	2,962	0.00018%	1.15610%	1,708	0.00068%
May-2016	0.55068%	2,973	0.00019%	1.17553%	1,714	0.00069%
Jun-2016	0.75207%	2,985	0.00025%	1.19030%	1,721	0.00069%
Jul-2016	0.92404%	2,984	0.00031%	1.19525%	1,723	0.00069%
Aug-2016	0.93545%	2,998	0.00031%	1.20569%	1,727	0.00070%
Sep-2016	0.97432%	3,012	0.00032%	1.25420%	1,725	0.00073%
Oct-2016	0.98376%	3,016	0.00033%	1.30959%	1,729	0.00076%
Nov-2016	0.99584%	3,029	0.00033%	1.38316%	1,731	0.00080%
Dec-2016	1.09855%	3,038	0.00036%	1.38926%	1,739	0.00080%
Jan-2017	1.11217%	3,051	0.00036%	1.40432%	1,739	0.00081%
Feb-2017	1.14538%	3,083	0.00037%	1.41195%	1,742	0.00081%
Mar-2017	1.08466%	3,097	0.00035%	1.43505%	1,740	0.00082%
Apr-2017	1.11014%	3,102	0.00036%	1.43074%	1,757	0.00081%
May-2017	1.16476%	3,106	0.00038%	1.50284%	1,752	0.00086%

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of Reynolds Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of CDK Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per CDK Rooftop	Share of Reynolds Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of Reynolds Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per Reynolds Rooftop
Jun-2017	1.16665%	3,126	0.00037%	1.47525%	1,754	0.00084%
Jul-2017	1.26894%	3,130	0.00041%	1.47287%	1,738	0.00085%
Aug-2017	1.28701%	3,143	0.00041%	1.57520%	1,739	0.00091%
Sep-2017	1.28492%	3,154	0.00041%	1.58032%	1,748	0.00090%
Oct-2017	1.31621%	3,155	0.00042%	1.58639%	1,746	0.00091%
Nov-2017	1.34267%	3,160	0.00042%	1.59326%	1,710	0.00093%
Dec-2017	1.34690%	3,167	0.00043%	1.60135%	1,709	0.00094%
Jan-2018	1.35633%	3,165	0.00043%	1.60230%	1,711	0.00094%
Feb-2018	1.38100%	3,184	0.00043%	1.61451%	1,708	0.00095%
Mar-2018	1.39672%	3,200	0.00044%	1.60924%	1,704	0.00094%
Apr-2018	1.40514%	3,197	0.00044%	1.61798%	1,693	0.00096%
May-2018	1.41888%	3,207	0.00044%	1.59321%	1,692	0.00094%
Jun-2018	1.44871%	3,237	0.00045%	1.61305%	1,687	0.00096%
Jul-2018	1.46821%	3,244	0.00045%	1.59059%	1,685	0.00094%
Aug-2018	1.47442%	3,262	0.00045%	1.65445%	1,669	0.00099%
Sep-2018	1.41890%	3,262	0.00043%	1.65561%	1,665	0.00099%
Oct-2018	1.09040%	3,264	0.00033%	1.21301%	1,660	0.00073%
Nov-2018	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Dec-2018	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Jan-2019	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Feb-2019	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Mar-2019	Outside the Reynolds Settlement Class Period; No fund share allocated.					
Apr-2019	Outside the Reynolds Settlement Class Period; No fund share allocated.					

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of Reynolds Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of CDK Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per CDK Rooftop	Share of Reynolds Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of Reynolds Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per Reynolds Rooftop
May-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jun-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jul-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Aug-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Sep-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Oct-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Nov-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Dec-2019		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jan-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Feb-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Mar-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Apr-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
May-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jun-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jul-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Aug-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Sep-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Oct-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Nov-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Dec-2020		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jan-2021		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Feb-2021		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Mar-2021		Outside the Reynolds Settlement Class Period; No fund share allocated.				

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of Reynolds Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of CDK Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per CDK Rooftop	Share of Reynolds Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of Reynolds Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per Reynolds Rooftop
Apr-2021						
May-2021						
Jun-2021						
Jul-2021						
Aug-2021						
Sep-2021						
Oct-2021						
Nov-2021						
Dec-2021						
Jan-2022						
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Oct-2022						
Nov-2022						
Dec-2022						
Jan-2023						
Feb-2023						

(A)	(B)	(C)	(D)=(B)/(C)	(E)	(F)	(G)=(E)/(F)
Month	Share of Reynolds Settlement Fund allocated to All CDK Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of CDK Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per CDK Rooftop	Share of Reynolds Settlement Fund allocated to All Reynolds Rooftops Based on Share of Damages in the Reynolds Settlement Class Period	Number of Reynolds Rooftops approved for Reynolds Settlement Fund	Share of Reynolds Settlement Fund per Reynolds Rooftop
Mar-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Apr-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
May-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jun-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jul-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Aug-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Sep-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Oct-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Nov-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Dec-2023		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jan-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Feb-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Mar-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Apr-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				
May-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jun-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Jul-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				
Aug-2024		Outside the Reynolds Settlement Class Period; No fund share allocated.				