

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

IN RE: TAHOE RESOURCES, INC. SECURITIES
LITIGATION

Case No. 2:17-cv-01868-RFB-NJK

**SUPPLEMENTAL DECLARATION OF OWEN F. SULLIVAN REGARDING: (A)
MAILING OF THE NOTICE AND CLAIM FORM; (B) PUBLICATION OF THE
SUMMARY NOTICE; AND (C) REPORT ON REQUESTS FOR EXCLUSION**

I, Owen F. Sullivan, declare and state as follows, pursuant to 28 U.S.C. §1746:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”), the Court-appointed Claims Administrator. The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision and, if called on to do so, I could and would testify competently thereto.

2. I submit this Declaration to supplement my earlier declaration, the Declaration of Owen F. Sullivan Regarding: (A) Mailing of the Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion, dated December 14, 2023 (ECF 254) (the “Initial Mailing Declaration”), which provided the Court with information regarding the implementation of the notice plan.

CONTINUED DISSEMINATION OF THE NOTICE PACKET

3. Since the execution of my Initial Mailing Declaration, Epiq has continued to disseminate copies of the Notice Packet in response to additional requests from potential Class Members and nominees. Through January 30, 2024, Epiq has mailed a total of 58,947 Notice Packets to potential Class Members and nominees.

4. Of the Notices mailed, Epiq received 337 Notices returned as undeliverable from the U.S. Postal Service. Epiq was able to obtain updated addresses for 58 of the Notices. Epiq re-mailed those 58 Notices via first-class mail. A total of 279 Notices remain undeliverable.

5. Epiq received a total of 315 email addresses for potential U.S. Class Members from nominees and sent an email containing a copy of the Notice Packet and a summary of the eligibility criteria for this matter. In addition, Broadridge, a nominee filer that had the largest number of potential class members in its database, sent a similar email containing a copy of the Notice Packet to e-mail addresses for the 17,362 shareholders in their database.

CALL CENTER AND WEBSITE

6. Epiq continues to maintain the toll-free telephone number (1-855-903-0315) and interactive voice response system to accommodate any inquiries from potential Class Members with questions about the Action and the Settlement. As of the date of this Declaration, 147 callers have called the toll-free number.

7. Epiq continues to maintain a website dedicated to the U.S. Settlement (www.USTahoeSettlement.com) and an email address (info@USTahoeSettlement.com) in order to assist Class Members. The website includes information regarding the Action and the proposed Settlement, including exclusion, objection, and claim filing deadlines, and the date, time and location of the Court's Settlement Hearing. The website has been visited 1,646 times as of January 26, 2024.

8. Epiq will continue maintaining and, as appropriate, updating the website and toll-free telephone number until the conclusion of the administration.

REPORT ON REQUESTS FOR EXCLUSION AND OBJECTIONS

9. The Notice, U.S. Settlement Website, and Summary Notice all inform potential U.S. Settlement Class Members that requests for exclusion from the U.S. Settlement Class must be mailed

or submitted via e-mail, so that they are received no later than January 18, 2024. Epiq has monitored all mail that has been delivered to this Post Office Box. As of the date of this Declaration, Epiq has not received any requests for exclusion.

10. The Notice Packet informed potential Class Members that objections to the proposed settlement were to be submitted to the Court, so as to be delivered by hand or sent by mail, postmarked no later than January 18, 2024. Although not required to be sent to Epiq, in the course of our settlement administration work, Epiq sometimes also receives copies of objections from Class Members. For the sake of completeness here, I note that as of the date of this Declaration, Epiq has received no objections.

UPDATE ON CLAIM SUBMISSIONS

11. To date, Epiq has received 13,708 Claims submissions.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on February 1, 2024 at Portland, OR.

Owen F. Sullivan