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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

DISTRICT COUNCIL #16 NORTHERN  
CALIFORNIA HEALTH AND WELFARE  
TRUST FUND, individually and on Behalf of All  
Others Similarly Situated,

Plaintiff,

vs.

SUTTER HEALTH; SUTTER BAY  
HOSPITALS; MARINHEALTH MEDICAL  
CENTER; SUTTER COAST HOSPITAL;  
SUTTER VALLEY HOSPITALS; SUTTER BAY  
MEDICAL FOUNDATION; SUTTER VALLEY  
MEDICAL FOUNDATION, and DOES 1-100.

Defendants

Case No. RG15753647

ASSIGNED FOR ALL PURPOSES TO:  
JUDGE: Honorable Michael Markman  
DEPT: 23

**DECLARATION OF ROBERT WILLIAMS  
III IN SUPPORT OF PLAINTIFF'S  
MOTION FOR FINAL APPROVAL OF  
SETTLEMENT, ATTORNEYS' FEES AND  
COSTS, AND A SERVICE AWARD**

Date: July 24, 2025  
Time: 10:00 a.m.  
Reservation No: A-15753647-022

Date Filed: January 6, 2015  
Trial Date: None Set

1 I, Robert Williams III, hereby declare:

2 1. I am the current Chairman of District Council 16 Northern California Health and  
3 Welfare Trust Fund ("DC 16"). I have been a member of the Board of Trustees of District  
4 Council #16 from 2012 to the present and have presided as Chairman of District Council #16  
5 since March 2020. I have served as Business Manager/Secretary-Treasurer of the Union since  
6 March 2020.  
7

8 2. I submit this Declaration in support of the Motion for Final Approval of  
9 Settlement, Attorneys' fees and expenses, and a Service Award. I have personal knowledge of  
10 each fact set forth below. If called as a witness, I could and would testify competently thereto.  
11

12 3. DC 16 is a Taft-Hartley trust and a non-profit, voluntary employee benefit  
13 association governed by the Employee Retirement Income Security Act of 1974 ("ERISA"). DC  
14 16 is considered a "self-funded health plan" as it provides benefits to Plan participants, their  
15 spouses, and beneficiaries for certain medical services pursuant to the terms of its Plan and  
16 makes payments to the medical providers for the services provided.  
17

18 4. DC 16 primarily provides benefits to members of District Council 16  
19 International Union of Painters and Allied Trades of Northern California and Northern Nevada  
20 (the "Union"). The Union's membership includes painters, tapers, drywall finishers, floor  
21 coverers, glaziers and related trades who partner with various employers in the construction  
22 industry.  
23

24 5. DC16's Board of Trustees ("Board") is responsible for managing and supervising  
25 this litigation. The Board was responsible for deciding to file this lawsuit, in accordance with  
26 Trust Fund procedures. In 2014, the board of trustees of the health plan investigated and  
27 assessed the potential claims and made the decision to bring the suit. Doug Christopher, a past  
28

1 third party administrator for DC16, former Trustee and Chairman Chris Christoffersen, and  
2 Trustee and Secretary John Maggiore, met with DC16's attorneys at Hausfeld LLP ("Class  
3 Counsel"), reviewed the potential claims, received several drafts of the Complaint for review.  
4 The Complaint was presented to the Board in late 2014, approved, and filed in January 2015.  
5

6 6. DC16 expended time and effort protecting the interests of the class for over nine  
7 years through monitoring the case; reviewing filings including Sutter's motion to compel  
8 arbitration and its demurrer; assisting in the drafting of Plaintiff's motion for class certification,  
9 and several motions for summary judgment, and responding to four separate requests for  
10 production of documents (totaling nearly 70 separate requests), two sets of special  
11 interrogatories, one set of requests for admissions, and one set of form interrogatories; making  
12 its witnesses available for several depositions; and producing thousands of pages of documents.  
13

14 7. When I and the other Trustees made the decision to file the lawsuit, we  
15 understood there was a risk there would be no remuneration for the time and effort expended by  
16 DC16 in its role class representative were the case ultimately to be unsuccessful. We also  
17 understood filing suit against an entity with whom DC16 maintained an ongoing business  
18 relationship through its health insurer intermediary posed a risk that this relationship could be  
19 negatively impacted.  
20

21 8. In 2014 and early 2015, DC16 and its agents, including its third party claims  
22 administrator, held many meetings and calls with Class Counsel regarding the claims of the case  
23 and the decision to file.  
24

25 9. From 2015 through to the present, the Board has directly overseen the litigation  
26 and the work of counsel. I and some other Board members engaged in communication with  
27 counsel concerning all significant developments in the litigation. From 2014 to the present, the  
28

1 entire Board has regularly received and reviewed reports from Class Counsel regarding this  
2 matter at its regularly scheduled Board meetings. DC16 and its agents received information and  
3 updates in other calls and meetings.

4           10. I and the other trustees collectively have spent a substantial number of hours  
5 assisting Class Counsel with responding to discovery requests. Some Trustees held interviews  
6 with Class Counsel and their data consultant to provide information to assist with the collection  
7 and production of documents and electronically stored information. In addition, several agents  
8 that provide services for DC16 in administering its health plan, also assisted Class Counsel with  
9 the collection of data and documents pertaining to DC16's health plan to comply with its  
10 discovery obligations. Coleen Christophersen, the account executive at Health Services &  
11 Benefit Administration, Inc. ("HS&BA"), DC 16's third party administrator, was primarily the  
12 person assisting in the collection of non-custodial documents and data including board meeting  
13 materials, plan documents, claims data, email and other communications. Others assisted in  
14 document searching and collection for Class Counsel including Doug Christopher of DC16's  
15 third party administrator Associated Third Party Administrators, Jeff Kao of DC16's health  
16 benefits consultant Segal Consulting, and Joe Thiermann, of DC16's auditor Lindquist LLP,  
17 among others.

18           11. I personally reviewed and verified nine sets of discovery responses including one  
19 set of responses to request for admission, five sets of responses to special interrogatories, and  
20 three sets of responses to form interrogatories. In addition, former Chairman Chris  
21 Christophersen reviewed and verified two sets of responses to special interrogatories.

22           12. Trustees and agents of DC 16 provided declarations in support of Plaintiff's  
23 motions and other filings. Chris Christophersen and Coleen Christophersen filed declarations in  
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1 support of Plaintiff's motion for class certification. Doug Christopher filed a declaration in  
2 support of Plaintiff's opposition to Sutter's motion to compel arbitration, and Jeffrey Kao filed a  
3 declaration in support of an *ex parte* application for a temporary restraining order and order to  
4 show cause.

5 13. Four people also sat for deposition and provided testimony on behalf of DC16 for  
6 this litigation: Doug Christopher (twice), Coleen Christophersen, Chris Christophersen, and John  
7 Maggiore.

8 14. I have reviewed the Declaration of Arthur N. Bailey, Jr. filed in support of the  
9 motion for final approval of settlement and believe the estimates of the number of hours spent  
10 devoted to the specifically identified tasks stated within are generally accurate to the best of my  
11 knowledge.

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

14 Executed on 5/27/2025, at Livermore, California.

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DocuSigned by:  
*Robert Williams*  
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ROBERT WILLIAMS III