

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

TEAM SCHIERL COMPANIES and
HEARTLAND FARMS, INC., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

ASPIRUS, INC. and ASPIRUS NETWORK,
INC.,

Defendants.

Civil Action No. 3:22-cv-00580-jdp

Hon. James D. Peterson, U.S.D.J.

Hon. Anita M. Boor, U.S.M.J.

Public - Redacted Version

**DECLARATION OF ZACHARY M. JOHNS IN SUPPORT OF DEFENDANTS’
OPPOSITION TO PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION**

I, Zachary M. Johns, declare as follows:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania and am admitted *pro hac vice* in the above-captioned action.

2. I am a Partner with the law firm of Morgan, Lewis & Bockius LLP, counsel for Defendants Aspirus, Inc. (“Aspirus”) and Aspirus Network, Inc. (“ANI”) in the above-captioned action.

3. I submit this declaration in support of Defendants’ Opposition to Plaintiffs’ Motion for Class Certification. I have knowledge of the following facts and if called upon would and could competently testify thereto.

4. Attached hereto as **Exhibit A** is a true and correct copy of [REDACTED]

[REDACTED] bearing the Bates numbers TEAM-SCHIERL-ASPIRUS-0005532 – 566.

5. Attached hereto as **Exhibit B** is a true and correct copy of a presentation titled, [REDACTED] bearing the Bates number TSC_001594_R.

6. Attached hereto as **Exhibit C** is a true and correct copy of a document titled, [REDACTED] bearing the Bates numbers HF_001496 – 497.

7. Attached hereto as **Exhibit D** is a true and correct copy of a presentation titled, [REDACTED] bearing the Bates numbers HF_001478 – 494.

8. Attached hereto as **Exhibit E** is a true and correct copy of a presentation titled, [REDACTED] bearing the Bates number TSC_013014.

9. Attached hereto as **Exhibit F** is a true and correct copy of a [REDACTED]
[REDACTED], bearing the Bates number TSC_012034.

10. Attached hereto as **Exhibit G** is a true and correct copy of a presentation titled, [REDACTED] bearing the Bates numbers HF_003843 – 855.

11. Attached hereto as **Exhibit H** is a true and correct copy of an email chain between [REDACTED] bearing the Bates numbers TSC_001395 – 397.

12. Attached hereto as **Exhibit I** is a true and correct copy of a presentation titled, [REDACTED] bearing the Bates number TSC_005947_R.

13. Attached hereto as **Exhibit J** is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED] bearing the Bates numbers TSC_016448 – 475.

14. Attached hereto as **Exhibit K** is a true and correct copy of a document titled, [REDACTED] bearing the Bates number TSC_001171_R.

15. Attached hereto as **Exhibit L** is a true and correct copy of an email from [REDACTED] bearing the Bates numbers TSC_001364_R – 365_R.

16. Attached hereto as **Exhibit M** is a true and correct copy of a letter to [REDACTED] bearing the Bates numbers TSC_012840 – 841.

17. Attached hereto as **Exhibit N** is a true and correct copy of [REDACTED] [REDACTED], which was produced without Bates numbers.

18. Attached hereto as **Exhibit O** is a true and correct copy of an email and attachment from [REDACTED] bearing the Bates number TSC_012008 – 009.

19. Attached hereto as **Exhibit P** is a true and correct copy of [REDACTED] [REDACTED], bearing the Bates numbers [REDACTED].

20. Attached hereto as **Exhibit Q** is a true and correct copy of [REDACTED] [REDACTED], bearing the Bates numbers TSC_016713 – 714.

21. Attached hereto as **Exhibit R** is a true and correct copy of an email chain between [REDACTED] bearing the Bates numbers TSC_013676_R – 678_R.

22. Attached hereto as **Exhibit S** is a true and correct copy of an email from [REDACTED]
[REDACTED] bearing the Bates number
TSC_016923.

23. Attached hereto as **Exhibit T** is a true and correct copy of [REDACTED]
[REDACTED]
bearing the Bates numbers [REDACTED]

24. Attached hereto as **Exhibit U** is a true and correct copy of a letter from [REDACTED]
[REDACTED] bearing the Bates number TSC_014578_R.

25. Attached hereto as **Exhibit V** is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED] which was produced
without Bates numbers.

26. Attached hereto as **Exhibit W** is a true and correct copy of a letter from [REDACTED]
[REDACTED] bearing the Bates number TSC_014308_R.

27. Attached hereto as **Exhibit X** is a true and correct copy of an [REDACTED]
[REDACTED]
[REDACTED] bearing the Bates numbers HF_009993 – 004.

28. Attached hereto as **Exhibit Y** is a true and correct copy of a [REDACTED]
[REDACTED]
[REDACTED] bearing the Bates number PS000142.

29. Attached hereto as **Exhibit Z** is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED] bearing the Bates numbers HF_008929 – 931.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on July 30, 2025, in Philadelphia, Pennsylvania.

Dated: July 30, 2025

Respectfully submitted,

/s/ Zachary M. Johns

Zachary M. Johns (*pro hac vice*)

Attorney for Defendants

Aspirus, Inc. and Aspirus Network, Inc.

Exhibit A

Filed Under Seal

Exhibit B

Filed Under Seal

Exhibit C

Filed Under Seal

Exhibit D

Filed Under Seal

Exhibit E

Filed Under Seal

Exhibit F

Filed Under Seal

Exhibit G

Filed Under Seal

Exhibit H

Filed Under Seal

Exhibit I

Filed Under Seal

Exhibit J

Filed Under Seal

Exhibit K

Filed Under Seal

Exhibit L

Filed Under Seal

Exhibit M

Filed Under Seal

Exhibit N

Filed Under Seal

Exhibit O

Filed Under Seal

Exhibit P

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Exhibit Q

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Exhibit R

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Exhibit S

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Exhibit T

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Exhibit U

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Exhibit V

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Exhibit W

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Exhibit X

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Exhibit Y

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Exhibit Z

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