

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SETH STERN, ANGELA BINDNER, and
MARIANNE SCHMITT, on their own
behalf, on behalf of all others similarly
situated, and on behalf of the JPMorgan
Chase Health Care and Insurance Program
for Active Employees and its component
Medical Plan,

Plaintiffs,

Case No. 1:25-cv-02097 (JLR)

v.

JPMORGAN CHASE & CO., JPMORGAN
CHASE BANK N.A., JPMORGAN CHASE
U.S. BENEFITS EXECUTIVE, and
JPMORGAN CHASE COMPENSATION &
MANAGEMENT DEVELOPMENT
COMMITTEE,

Defendants.

DECLARATION OF TYLER HAYDELL

I, Tyler Haydell, declare and state as follows:

1. I am a data scientist at Fairmark Partners LLP and have performed work on behalf of Plaintiffs in the above-captioned action. I submit this declaration in opposition to Defendants' Motion to Dismiss.

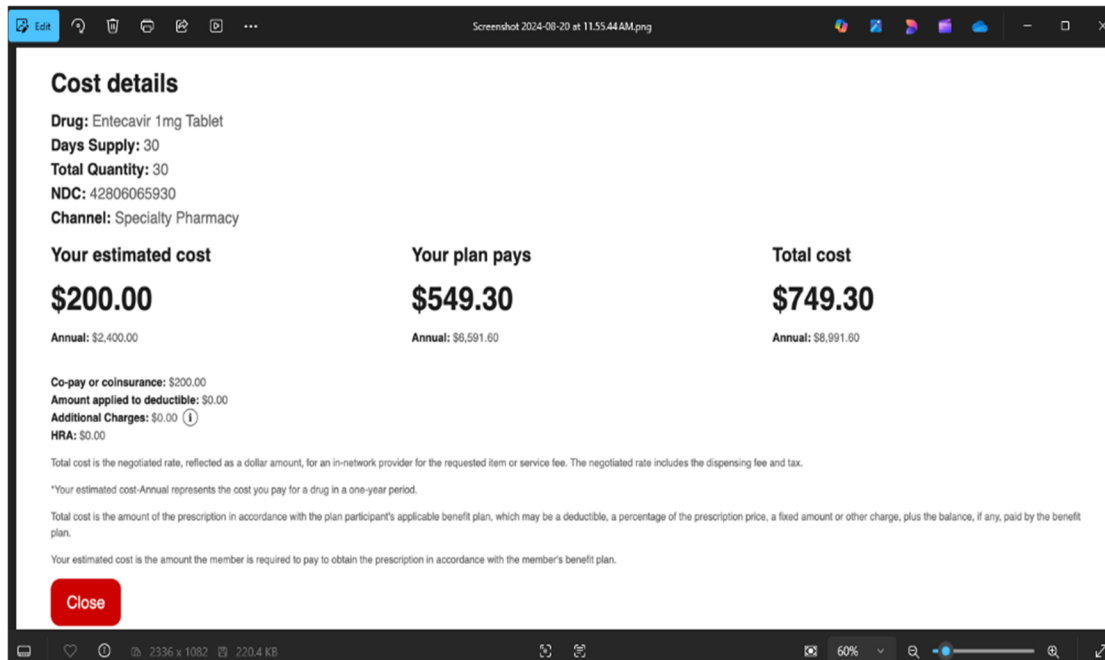
2. Before the Complaint in this case was filed, I navigated to JPMorgan's dedicated Caremark website at <https://info.caremark.com/oe/jpmc>. That website included a "Your costs" option that allowed users to "Know what you'll pay out-of-pocket for any brand name or generic equivalent prescription drug." By entering the name and dosage of a drug, users could view the "total cost," the amount the "Plan pays" and "Your estimated cost."

3. I searched this website for every drug and dosage for which the Plan's prices are

listed and/or described in the Complaint. The prices in the Complaint accurately reflect my findings.

4. I am aware that Defendants’ brief in support of their Motion to Dismiss states that “there is every reason to think [Plaintiffs’ figures] are not [accurate]” because “the publicly available Plan benefits portal lists a total cost of \$206.59” for a 30-unit prescription of Entecavir (1 mg), rather than the price listed in paragraph 119 of the Complaint, which alleges that Defendant agreed to a price of \$749.30.

5. The price in the Complaint accurately reflects the Plan’s website at the time I conducted my searches. To protect against potential accusations like Defendants’, I saved images of the screenshots of the price details for the drugs and dosages that I searched, including Entecavir (1mg). This is the screenshot I took on August 20, 2024, reflecting a “Total cost” of \$749.30:



6. I have examined the metadata of this image file, which states that the image was created on “Tuesday, August 20, 2024.”

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 25, 2025

/s/ Tyler Haydell
Tyler Haydell