

ADDENDUM TO STIPULATION OF SETTLEMENT

By and through their respective undersigned counsel of record, the parties agree to modify the Stipulation of Settlement (Dkt. 614-3) as follows:

Section 1.34. The following language shall be added to the last sentence of Section 1.34, which defines the Settlement Class Member Information to be provided by Sunrise to the Settlement Administrator: "... and (e) the number of days that each Settlement Class Member resided in a Sunrise California Community during the Class Period (herein "Residency Days")."

Section 7.6. The entire text of Section 7.6, which describes how the Settlement Awards shall be calculated, shall be replaced with the following language:

"Subject to Court approval, the amount of the Settlement Award shall be calculated as follows.

7.6.1. Each Settlement Class Member shall receive a Base Payment of \$500. All such Base Payments shall be paid from the Net Settlement Fund. The remaining balance of the Net Settlement Fund after deducting all Base Payments shall be referred to the Adjusted Net Settlement Fund.

7.6.2. Each Settlement Class Member shall also receive an additional payment based on the number of days that the Settlement Class Member resided in a Sunrise California Community during the Class Period (herein "Residency Days Payment"), which shall be calculated by the Settlement Administrator as follows. First, determine the "Total Residency Days" by tallying the total Residency Days for all Settlement Class Members. Second, calculate a "Residency Days Percentage" for each Settlement Class Member by dividing the Settlement Class Member's Residency Days by Total Residency Days. Third, multiply the Residency Days Percentage for each Settlement Class Member by the Adjusted Net Settlement Fund.

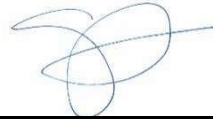
For illustration purposes only, assume the total number of Settlement Class Members is 3500, the Net Settlement Fund is \$5 million, the Adjusted Net

Settlement Fund is \$3.25 million, and the Total Residency Days are 365,000. A Settlement Class Member who resided in a Sunrise California Community for one year (365 days) during the Class Period would have a Residency Days Percentage of .001, and thus receive a Residency Days Payment of \$3,250 (.001 times the \$3.25 million Adjusted Net Settlement Fund). Adding the Residency Days Payment of \$3,250 to the Base Payment of \$500, the initial Settlement Award for this hypothetical Settlement Class Member would be \$3,750.”

Section 7.9. The second sentence of Section 7.9, which addresses potential supplemental payments if not all Settlement Class Members cash their initial Settlement Award checks, shall be revised to read: “... with the share amounts of any supplemental distribution to be calculated using the Residency Days Payment procedure set forth in Section 7.6 above, with Residency Days Percentages and supplemental payments to be calculated based on the Settlement Class Members who cashed their initial Settlement Award checks.”

DATED: June _10_, 2024

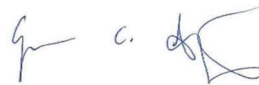
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DATED: June 12, 2024

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