

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Vikram Bhatia, D.D.S., et al., on behalf
of themselves and all others similarly
situated,

Plaintiffs,

v.

3M Company,

Defendant.

Case No. 0:16-cv-01304-DWF-DTS

**DECLARATION OF
DANIEL C. HEDLUND IN SUPPORT
OF PLAINTIFFS' MOTION FOR
FOURTH DISBURSEMENT OF
SETTLEMENT FUNDS TO
CLAIMANTS, PAYMENT OF FEES
AND EXPENSES FOR THE CLAIMS
ADMINISTRATOR, AND
PROPOSAL FOR DISTRIBUTION
OF REMAINING FUNDS**

I, Daniel C. Hedlund, hereby declare and state as follows:

1. I am a partner in the law firm of Gustafson Gluek PLLC (“Gustafson Gluek”), one of the Co-Lead Counsel firms appointed by the Court. I submit this declaration in support of Plaintiffs’ Plaintiffs’ Motion for Fourth Disbursement Of Settlement Funds To Claimants, Payment Of Fees And Expenses For The Claims Administrator, And Proposal For Distribution Of Remaining Funds.

2. I make this declaration based on personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

3. Pursuant to the Plan of Distribution ¶ 13 (Doc. No. 131-1), Class Counsel proposes these remaining \$9,155,805.22 funds be divided and distributed to all 462 claimants who submitted 33,303 Fixed-Amount Claims during one or both claim periods.

This equates to an additional \$274.92 per debond. Attached hereto this declaration as Exhibit Aa list of the recommended awards for the 462 claimants who submitted a total of 33,303 Fixed-Amount debonds.

I, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, and under the laws of the United States of America that the foregoing and the attached are true and correct to the best of my knowledge. Executed on this 2nd day of June 2022, in Minneapolis, Minnesota.

/s/ Daniel C. Hedlund
Daniel C. Hedlund

EXHIBIT A - 3M LAVA ULTIMATE ELIGIBLE FIXED AMOUNT CLAIMS SUPPLEMENTAL CLAIM PERIOD			
	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
1	112018387	4	\$1,099.70
2	114573703	19	\$5,223.56
3	120607017	153	\$42,063.42
4	138184250	35	\$9,622.35
5	138795701	55	\$15,120.84
6	151036503	436	\$119,867.01
7	155216894	400	\$109,969.74
8	155315637	109	\$29,966.75
9	156547632	35	\$9,622.35
10	165354377	49	\$13,471.29
11	170410843	228	\$62,682.75
12	174148194	123	\$33,815.69
13	179274665	6	\$1,649.55
14	191051031	50	\$13,746.22
15	191200998	11	\$3,024.17
16	197708909	79	\$21,719.02
17	207401860	306	\$84,126.85
18	214162376	20	\$5,498.49
19	216830957	4	\$1,099.70
20	217318651	67	\$18,419.93
21	220384225	29	\$7,972.81
22	223958100	4	\$1,099.70
23	224182054	5	\$1,374.62
24	231065970	18	\$4,948.64
25	231232962	6	\$1,649.55
26	232324746	5	\$1,374.62
27	232818485	50	\$13,746.22
28	233951050	23	\$6,323.26
29	234794971	480	\$131,963.68
30	238371196	20	\$5,498.49
31	240737266	4	\$1,099.70
32	246326919	77	\$21,169.17
33	251101449	19	\$5,223.56
34	255357199	30	\$8,247.73
35	262189873	3	\$824.77
36	265989410	31	\$8,522.65
37	266585555	22	\$6,048.34
38	269799355	150	\$41,238.65
39	276544644	10	\$2,749.24
40	277998442	25	\$6,873.11
41	279088093	5	\$1,374.62
42	282197297	22	\$6,048.34
43	289861189	6	\$1,649.55
44	294691783	96	\$26,392.74
45	296104063	166	\$45,637.44
46	301493036	74	\$20,344.40
47	305384201	5	\$1,374.62
48	310356842	205	\$56,359.49
49	316985131	238	\$65,431.99
50	319107776	10	\$2,749.24
51	327024207	11	\$3,024.17
52	327771908	33	\$9,072.50
53	330325781	5	\$1,374.62
54	332945607	38	\$10,447.12
55	335087555	2	\$549.85

EXHIBIT A - 3M LAVA ULTIMATE ELIGIBLE FIXED AMOUNT CLAIMS SUPPLEMENTAL CLAIM PERIOD			
	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
56	342003585	45	\$12,371.60
57	346175199	262	\$72,030.18
58	346219770	177	\$48,661.61
59	346411667	30	\$8,247.73
60	353243887	25	\$6,873.11
61	361762106	93	\$25,567.96
62	371976322	19	\$5,223.56
63	372569408	13	\$3,574.02
64	376556242	6	\$1,649.55
65	376591194	30	\$8,247.73
66	381842160	3	\$824.77
67	390124591	12	\$3,299.09
68	392948036	6	\$1,649.55
69	397903462	16	\$4,398.79
70	398333602	45	\$12,371.60
71	400123623	58	\$15,945.61
72	403281612	36	\$9,897.28
73	405616707	50	\$13,746.22
74	408388496	10	\$2,749.24
75	408802482	119	\$32,716.00
76	412052286	216	\$59,383.66
77	413365685	25	\$6,873.11
78	421948657	28	\$7,697.88
79	424619255	8	\$2,199.39
80	429808336	17	\$4,673.71
81	430187865	9	\$2,474.32
82	430681758	36	\$9,897.28
83	431506642	56	\$15,395.76
84	432249903	23	\$6,323.26
85	432693240	8	\$2,199.39
86	444047413	27	\$7,422.96
87	451735937	10	\$2,749.24
88	453126080	20	\$5,498.49
89	453500151	8	\$2,199.39
90	453743455	6	\$1,649.55
91	459183116	43	\$11,821.75
92	460702472	28	\$7,697.88
93	466266145	10	\$2,749.24
94	467179837	61	\$16,770.38
95	479963914	74	\$20,344.40
96	481635596	250	\$68,731.08
97	495271571	33	\$9,072.50
98	498835540	33	\$9,072.50
99	501886271	19	\$5,223.56
100	507721949	10	\$2,749.24
101	513692985	12	\$3,299.09
102	517180011	8	\$2,199.39
103	518112250	174	\$47,836.83
104	519655739	66	\$18,145.01
105	523294820	36	\$9,897.28
106	524290308	45	\$12,371.60
107	546030484	20	\$5,498.49
108	550232015	5	\$1,374.62
109	552698272	18	\$4,948.64
110	555363117	66	\$18,145.01

EXHIBIT A - 3M LAVA ULTIMATE ELIGIBLE FIXED AMOUNT CLAIMS SUPPLEMENTAL CLAIM PERIOD			
	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
111	560350378	250	\$68,731.08
112	562895820	78	\$21,444.10
113	566507961	2	\$549.85
114	574916271	4	\$1,099.70
115	576944386	56	\$15,395.76
116	577749301	37	\$10,172.20
117	579904260	96	\$26,392.74
118	587273741	69	\$18,969.78
119	587662825	10	\$2,749.24
120	588442498	37	\$10,172.20
121	588712193	81	\$22,268.87
122	605936637	73	\$20,069.48
123	608682388	53	\$14,570.99
124	609787573	8	\$2,199.39
125	610586178	2	\$549.85
126	611259904	1276	\$350,803.45
127	613044339	12	\$3,299.09
128	614661122	2	\$549.85
129	614794958	39	\$10,722.05
130	614950157	1	\$274.92
131	618372112	20	\$5,498.49
132	619645222	432	\$118,767.31
133	623986112	12	\$3,299.09
134	629286610	412	\$113,268.83
135	632055481	20	\$5,498.49
136	634214704	162	\$44,537.74
137	640504933	87	\$23,918.42
138	644358055	6	\$1,649.55
139	644856119	3	\$824.77
140	654129205	73	\$20,069.48
141	663364752	13	\$3,574.02
142	663887443	76	\$20,894.25
143	667498051	6	\$1,649.55
144	669833235	42	\$11,546.82
145	670385717	5	\$1,374.62
146	672592457	98	\$26,942.59
147	673942762	8	\$2,199.39
148	682185043	70	\$19,244.70
149	684463248	24	\$6,598.18
150	684824204	71	\$19,519.63
151	687022553	4	\$1,099.70
152	691034900	42	\$11,546.82
153	693602442	22	\$6,048.34
154	695986250	50	\$13,746.22
155	697568646	13	\$3,574.02
156	699135326	368	\$101,172.16
157	699492182	34	\$9,347.43
158	701039345	3	\$824.77
159	702871881	505	\$138,836.79
160	705010901	35	\$9,622.35
161	708618240	2	\$549.85
162	710560190	128	\$35,190.32
163	715194802	36	\$9,897.28
164	716172086	131	\$36,015.09
165	722978080	8	\$2,199.39

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	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
166	724133796	7	\$1,924.47
167	724852369	146	\$40,138.95
168	725179914	37	\$10,172.20
169	726263558	31	\$8,522.65
170	729544920	195	\$53,610.25
171	730558423	3	\$824.77
172	735374426	25	\$6,873.11
173	748252769	8	\$2,199.39
174	757266920	50	\$13,746.22
175	769450777	9	\$2,474.32
176	777077719	222	\$61,033.20
177	784627267	45	\$12,371.60
178	786899349	4	\$1,099.70
179	791802876	2	\$549.85
180	795006130	2	\$549.85
181	795679888	39	\$10,722.05
182	796342215	21	\$5,773.41
183	797138781	165	\$45,362.52
184	800581689	100	\$27,492.43
185	802755323	16	\$4,398.79
186	803485043	10	\$2,749.24
187	804901980	7	\$1,924.47
188	805016599	10	\$2,749.24
189	808530182	10	\$2,749.24
190	813138282	1	\$274.92
191	822352785	40	\$10,996.97
192	825900926	50	\$13,746.22
193	826636222	40	\$10,996.97
194	827638005	6	\$1,649.55
195	827832240	83	\$22,818.72
196	830348140	37	\$10,172.20
197	830718238	47	\$12,921.44
198	831491218	75	\$20,619.33
199	834764261	12	\$3,299.09
200	840297823	50	\$13,746.22
201	842140506	39	\$10,722.05
202	843272870	7	\$1,924.47
203	844025301	238	\$65,431.99
204	846374741	78	\$21,444.10
205	847764172	76	\$20,894.25
206	851953105	17	\$4,673.71
207	856340995	5	\$1,374.62
208	871289132	3	\$824.77
209	871318765	35	\$9,622.35
210	872786326	9	\$2,474.32
211	874712157	536	\$147,359.45
212	884772306	254	\$69,830.78
213	884952082	31	\$8,522.65
214	887336072	12	\$3,299.09
215	888776484	15	\$4,123.87
216	893298099	568	\$156,157.02
217	893784178	3	\$824.77
218	895885343	38	\$10,447.12
219	904539422	103	\$28,317.21
220	905459551	107	\$29,416.90

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	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
221	910660162	12	\$3,299.09
222	913918754	3	\$824.77
223	918146951	3	\$824.77
224	925077233	29	\$7,972.81
225	925781397	205	\$56,359.49
226	929665343	50	\$13,746.22
227	930042671	10	\$2,749.24
228	934187343	135	\$37,114.79
229	934245532	2	\$549.85
230	934962062	257	\$70,655.55
231	935130620	17	\$4,673.71
232	936346223	19	\$5,223.56
233	946796864	158	\$43,438.05
234	948619445	65	\$17,870.08
235	957109357	17	\$4,673.71
236	959452736	3	\$824.77
237	961359353	109	\$29,966.75
238	962854458	100	\$27,492.43
239	966081954	15	\$4,123.87
240	966113548	5	\$1,374.62
241	968423862	40	\$10,996.97
242	972376912	6	\$1,649.55
243	975036863	120	\$32,990.92
244	980307423	4	\$1,099.70
245	985846609	13	\$3,574.02
246	986178237	5	\$1,374.62
247	995428295	6	\$1,649.55
248	998133911	38	\$10,447.12
249	998962773	3	\$824.77
250	216075308	61	\$16,770.38
251	306388063	122	\$33,540.77
252	132649916	34	\$9,347.43
253	286493756	154	\$42,338.35
254	351060068	4	\$1,099.70
255	597018475	42	\$11,546.82
256	840355484	51	\$14,021.14
257	927861151	284	\$78,078.51
258	297372444	9	\$2,474.32
259	737366495	64	\$17,595.16
260	421149878	13	\$3,574.02
261	559227249	13	\$3,574.02
262	785384381	29	\$7,972.81
263	851014432	3	\$824.77
264	836358535	28	\$7,697.88
265	312154672	280	\$76,978.81
266	654671130	25	\$6,873.11
267	611061944	32	\$8,797.58
268	375738778	255	\$70,105.71
269	797109664	15	\$4,123.87
270	785829935	930	\$255,679.63
271	534316453	159	\$43,712.97
272	864195431	22	\$6,048.34
273	873043200	19	\$5,223.56
274	468678814	26	\$7,148.03
275	956532568	163	\$44,812.67

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	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
276	717653591	104	\$28,592.13
277	412684968	320	\$87,975.79
278	501595531	150	\$41,238.65
279	134298633	24	\$6,598.18
280	433426240	7	\$1,924.47
281	492374427	47	\$12,921.44
282	522073982	232	\$63,782.45
283	179170334	540	\$148,459.14
284	762641111	42	\$11,546.82
285	871066854	43	\$11,821.75
286	391129211	242	\$66,531.69
287	806138826	852	\$234,235.54
288	765521121	415	\$114,093.60
289	902288896	125	\$34,365.54
290	584981082	22	\$6,048.34
291	468766245	12	\$3,299.09
292	470825229	2	\$549.85
293	647345703	5	\$1,374.62
294	454395905	56	\$15,395.76
295	652035254	4	\$1,099.70
296	175365992	3	\$824.77
297	168799346	5	\$1,374.62
298	925290705	4	\$1,099.70
299	996932599	6	\$1,649.55
300	883720128	1	\$274.92
301	436385698	3	\$824.77
302	132396597	2	\$549.85
303	298255134	1	\$274.92
304	111885091	14	\$3,848.94
305	806974486	5	\$1,374.62
306	483014085	2	\$549.85
307	821475137	4	\$1,099.70
308	177311438	4	\$1,099.70
309	994433221	105	\$28,867.06
310	553334241	34	\$9,347.43
311	337308495	14	\$3,848.94
312	876611917	26	\$7,148.03
313	689834194	34	\$9,347.43
314	850565421	18	\$4,948.64
315	121013652	264	\$72,580.03
316	917257639	51	\$14,021.14
317	552449873	7	\$1,924.47
318	144349678	14	\$3,848.94
319	563752712	68	\$18,694.85
320	313188160	41	\$11,271.90
321	454390817	56	\$15,395.76
322	502259878	39	\$10,722.05
323	417446554	5	\$1,374.62
324	366320796	8	\$2,199.39
325	527076914	11	\$3,024.17
326	265477337	9	\$2,474.32
327	936672200	9	\$2,474.32
328	530559150	34	\$9,347.43
329	262996092	49	\$13,471.29
330	374996641	4	\$1,099.70

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	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
331	119702096	4	\$1,099.70
332	343361359	262	\$72,030.18
333	255133553	21	\$5,773.41
334	163423852	7	\$1,924.47
335	991985199	9	\$2,474.32
336	608668680	273	\$75,054.34
337	228788066	43	\$11,821.75
338	866629831	4	\$1,099.70
339	812307222	17	\$4,673.71
340	201392182	30	\$8,247.73
341	608267687	21	\$5,773.41
342	497950339	36	\$9,897.28
343	647235993	81	\$22,268.87
344	596764344	18	\$4,948.64
345	351227705	7	\$1,924.47
346	310555897	7	\$1,924.47
347	867578196	133	\$36,564.94
348	147442808	22	\$6,048.34
349	351942803	49	\$13,471.29
350	518505076	49	\$13,471.29
351	607240556	175	\$48,111.76
352	476035188	14	\$3,848.94
353	444001823	12	\$3,299.09
354	317784962	15	\$4,123.87
355	496449599	34	\$9,347.43
356	219074888	80	\$21,993.95
357	134587710	1	\$274.92
358	889884437	21	\$5,773.41
359	277844303	6	\$1,649.55
360	954700763	28	\$7,697.88
361	503934626	48	\$13,196.37
362	126949289	2	\$549.85
363	413988637	19	\$5,223.56
364	430012626	243	\$66,806.61
365	702492106	54	\$14,845.91
366	617505931	110	\$30,241.68
367	960471771	238	\$65,431.99
368	872307131	22	\$6,048.34
369	944660965	18	\$4,948.64
370	836978260	41	\$11,271.90
371	749712546	79	\$21,719.02
372	251746919	15	\$4,123.87
373	281160027	1	\$274.92
374	765219820	4	\$1,099.70
375	113673492	15	\$4,123.87
376	278150349	12	\$3,299.09
377	785910746	15	\$4,123.87
378	825096417	8	\$2,199.39
379	444699650	17	\$4,673.71
380	972766907	4	\$1,099.70
381	317370545	23	\$6,323.26
382	611838629	21	\$5,773.41
383	483278737	5	\$1,374.62
384	361862915	87	\$23,918.42
385	952056140	2550	\$701,057.06

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	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
386	920473270	655	\$180,075.44
387	441427689	148	\$40,688.80
388	919979106	2	\$549.85
389	321734905	17	\$4,673.71
390	828246049	41	\$11,271.90
391	847806405	237	\$65,157.07
392	955372905	15	\$4,123.87
393	757266920	100	\$27,492.43
394	210057465	9	\$2,474.32
395	464426919	20	\$5,498.49
396	905459551	37	\$10,172.20
397	170410843	118	\$32,441.07
398	800581689	242	\$66,531.69
399	112934947	3	\$824.77
400	120607017	27	\$7,422.96
401	127883593	28	\$7,697.88
402	138795701	5	\$1,374.62
403	155315637	27	\$7,422.96
404	166039274	5	\$1,374.62
405	174148194	27	\$7,422.96
406	183381263	37	\$10,172.20
407	196494302	144	\$39,589.10
408	210848970	11	\$3,024.17
409	224654346	43	\$11,821.75
410	280407949	5	\$1,374.62
411	287840762	9	\$2,474.32
412	380840408	27	\$7,422.96
413	403281612	9	\$2,474.32
414	412052286	63	\$17,320.23
415	416588486	46	\$12,646.52
416	445616136	8	\$2,199.39
417	446704232	11	\$3,024.17
418	454994538	7	\$1,924.47
419	455247946	8	\$2,199.39
420	497748373	22	\$6,048.34
421	538836378	12	\$3,299.09
422	550306548	31	\$8,522.65
423	579904260	15	\$4,123.87
424	588229063	10	\$2,749.24
425	588712193	8	\$2,199.39
426	655468302	21	\$5,773.41
427	669225370	4	\$1,099.70
428	684471011	25	\$6,873.11
429	689518722	49	\$13,471.29
430	691034900	2	\$549.85
431	728944495	24	\$6,598.18
432	768489499	40	\$10,996.97
433	788566959	6	\$1,649.55
434	802755323	5	\$1,374.62
435	855284150	19	\$5,223.56
436	878577889	50	\$13,746.22
437	884772306	81	\$22,268.87
438	934962062	188	\$51,685.78
439	951482161	326	\$89,625.33
440	959765373	5	\$1,374.62

EXHIBIT A - 3M LAVA ULTIMATE ELIGIBLE FIXED AMOUNT CLAIMS SUPPLEMENTAL CLAIM PERIOD			
	A	B	C
	CONFIRMATION ID	FIXED AMOUNT DEBONDS AWARDED BY THE SCRC	TOTAL AWARD AMOUNT
441	963668258	2	\$549.85
442	967031944	70	\$19,244.70
443	979829099	17	\$4,673.71
444	980353109	53	\$14,570.99
445	168093850	5	\$1,374.62
446	170425481	6	\$1,649.55
447	330456543	15	\$4,123.87
448	134059009	81	\$22,268.87
449	168179687	1	\$274.92
450	134049348	3	\$824.77
451	197091372	2	\$549.85
452	369756111	328	\$90,175.18
453	552698272	4	\$1,099.70
454	557984594	2	\$549.85
455	814876184	10	\$2,749.24
456	910686090	26	\$7,148.03
457	976325084	7	\$1,924.47
458	216857786	7	\$1,924.47
459	147452831	233	\$64,057.37
460	167694356	7	\$1,924.47
461	165975429	7	\$1,924.47
462	108695758	4	\$1,099.70
463	TOTAL	33303	\$9,155,805.22