

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

In re Aflac Inc. Data Breach Litigation

No. 4:25-CV-00183-CDL

**ORDER APPOINTING PLAINTIFFS'
INTERIM CLASS COUNSEL**

This matter is before the Court on the three (3) Motions to Appoint Interim Co-Lead Class Counsel (Docs. 36-37, 43) pursuant to Federal Rule of Civil Procedure 23(g) in the above-captioned consolidated case. The Court has weighed the considerations set forth in Rule 23(g)(2), including: (i) counsel's work in identifying or investigating potential claims, (ii) counsel's experience in handling class actions and the types of claims involved, (iii) counsel's knowledge of the applicable laws, and (iv) the resources counsel commits to representing the class. *See* Fed. R. Civ. P. 23(g)(1)(A). The Court has also considered counsel's willingness and ability to commit to a time-consuming process, and the ability to work cooperatively with each other, Plaintiffs' counsel and Defendant's counsel. Having considered all timely submissions in light of the criteria set forth above and in the Manual for Complex Litigation and Rule 23(g)(2), the Court hereby appoints the following counsel to personally serve as Interim Co-Lead Class Counsel:

1. Plaintiffs' Interim Co-Lead Class Counsel

- a. Michael L. McGlamry of Pope, McGlamry, Kilpatrick, Morrison & Norwood, P.C.;
- b. Jeff Ostrow of Kopelowitz Ostrow P.A.;
- c. Casandra Turner of Milberg Coleman Bryson Phillips Grossman, PLLC;
- d. Larry Golston of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.;

- e. MaryBeth V. Gibson of Gibson Consumer Law Group, LLC; and
- f. John Yanchunis of Morgan and Morgan Complex Litigation Group.

The proposed Interim Co-Lead Class Counsel are hereby designated as Interim Co-Lead Class Counsel pursuant to Rule 23(g) to “act on behalf of a putative class before determining whether to certify the action as a class action.” *See id.*

2. Duties of the six (6) named Interim Co-Lead Class Counsel:

- a. Interim Co-Lead Class Counsel shall file Plaintiffs’ Consolidated Class Action Complaint (“CCAC”) within 60 days of the Court’s entry of this Order, which shall serve as the operative complaint in the Consolidated Action, as set forth in the Order Granting Plaintiffs’ Unopposed Motion to Consolidate Cases (Doc. 7);
- b. Interim Co-Lead Class Counsel shall direct and manage pretrial proceedings on behalf of all Plaintiffs, including the briefing and argument of motions and the conduct of all types of discovery proceedings and shall serve as the primary point of contact for communications between Plaintiffs’ counsel and the Court;
- c. Interim Co-Lead Class Counsel shall coordinate discovery on behalf of Plaintiffs and the Class consistent with the requirements of the Federal Rules of Civil Procedure, the Local Rules of the Middle District of Georgia, and the Court’s Important Notice Regarding Electronic Filing;
- d. Interim Co-Lead Class Counsel shall meet and confer as needed regarding the completion of the Plaintiffs’ pretrial and trial activities. Interim Co-Lead Class Counsel shall participate in the determination of any significant matters that arise in the litigation;

- e. Interim Co-Lead Class Counsel shall delegate work responsibilities and monitor the activities of all Plaintiffs' counsel to assure that Plaintiffs' pretrial preparation is conducted effectively, efficiently, and economically, that schedules are met, and that unnecessary expenditures of time and expense are avoided;
- f. Interim Co-Lead Class Counsel shall distribute to all Plaintiffs' counsel a Protocol for recording time and expense;
- g. Interim Co-Lead Class Counsel shall consult with and employ consultants or experts, as necessary;
- h. Interim Co-Lead Class Counsel shall coordinate with other Plaintiffs' counsel in management of the litigation and fund the necessary and appropriate costs of discovery and other class benefit efforts, including the maintenance of a plaintiffs' document depository, see Manual for Complex Litigation, Fourth, section 40.261;
- i. Interim Co-Lead Class Counsel shall enter into stipulations with other parties as necessary for the conduct of the litigation;
- j. Interim Co-Lead Class Counsel shall prepare and distribute to the parties periodic status reports;
- k. Interim Co-Lead Class Counsel shall negotiate and enter into stipulations with opposing counsel as necessary for the conduct and efficient advancement of the litigation;
- l. Interim Co-Lead Class Counsel shall communicate with the Court concerning scheduling and other administrative matters;
- m. Interim Co-Lead Class Counsel shall engage in settlement discussions or other dispute resolution efforts on behalf of the Plaintiffs;

- n. Interim Co-Lead Class Counsel shall ensure that all notices, orders, and material communications are properly distributed (to the extent that they are not otherwise served on Plaintiffs' counsel via the Court's electronic filing system); and
- o. Interim Co-Lead Class Counsel shall perform such other duties as may be incidental to pretrial activities or as authorized by further Order of the Court.

This Order shall apply to any action filed in, transferred to, or removed to this Court which relates to the subject matter of this case.

SO ORDERED, this 15th day of October, 2025.

**_S/Clay D. Land
CLAY D. LAND
U.S. DISTRICT COURT JUDGE
MIDDLE DISTRICT OF GEORGIA**