

EXHIBIT 2

UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS

LOCAL 295 IBT EMPLOYER GROUP)	Civil Action No. 2:22-cv-02432-EFM-ADM
WELFARE FUND, Individually and on Behalf))	
of All Others Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiff,)	
)	
vs.)	
)	
COMPASS MINERALS INTERNATIONAL,)	
INC., et al.,)	
)	
Defendants.)	
)	
_____)	

**DECLARATION OF LINDA KELLNER IN SUPPORT OF (1) LEAD PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND
APPROVAL OF PLAN OF ALLOCATION; AND (2) LEAD COUNSEL'S MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND AWARD TO LEAD
PLAINTIFF PURSUANT TO 15 U.S.C. §78u-4(a)(4)**

I, Linda Kellner, declare as follows:

1. I am the Third Party Administrator for Local 295 IBT Employer Group Welfare Fund (the “Fund”). As the Fund’s Third Party Administrator, I have overseen the Fund’s participation in this matter since October 21, 2022, when the Fund filed the initial complaint. I respectfully submit this declaration in support of (1) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation of Settlement Proceeds; and (2) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4) (the “Settlement”).

2. The Fund is a multi-employer fund that represents working men and women in New York, New Jersey, and Connecticut, who work in a wide variety of jobs and industries, including air freight chauffeurs, handlers, warehouse workers, production, and industrial employees.

3. Local 295 has more than 1,800 participants and oversees \$74 million in assets.

4. As part of this process, I along with Local 295’s counsel have been delegated to oversee this litigation and together have in fact monitored outside legal counsel in this Action. The Fund has participated in and monitored the progress of this Action since the filing of the initial complaint. Specifically, the Fund has participated in numerous meetings and conference calls with Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) (collectively, with Kirby McInerney, “Lead Counsel”), closely followed the procedural developments in the case, reviewed motions and briefs with the Court, responded to discovery requests, and participated in settlement discussions.

5. As part of its duties as Additional Plaintiff, the Fund was committed to optimizing the outcome of this Action. The Fund believes that the proposed Settlement Amount of \$48 million represents an outstanding result for the Class and the proposed Settlement merits the Court’s approval.

6. While the Fund understands that the determination of attorneys' fees is left to the Court, the Fund supports Lead Counsel's application for 23.56% of the Settlement Amount and expenses in the amount of \$368,527.48. The Fund believes the request is fair, reasonable and appropriate as this Settlement would not have been possible without the diligent efforts of Lead Counsel, which vigorously litigated for over two years.

7. The Fund also understands that payment of Additional Plaintiff's reasonable expenses is authorized under the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4(a)(4). For this reason, in connection with Lead Counsel's application for an award of attorneys' fees and expenses, the Fund also respectfully requests that the Court grant an award of \$10,000 to the Fund for the time and effort the Fund expended representing class members in this Action, overseeing Lead Counsel's efforts, and reviewing and authorizing important decisions in the litigation, including settlement.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd day of June, 2025, at New York


LINDA KELLNER
THIRD PARTY ADMINISTRATOR