FILED: NEW YORK COUNTY CLERK 04/29/2022 07:26 PM INDEX NO. 653594/2018

NYSCEF DOC. NO. 1017

RECEIVED NYSCEF: 04/29/2022

Exhibit A



NYSCEF DOC. NO. 1017

INDEX NO. 653594/2018

RECEIVED NYSCEF: 04/29/2022



Epiq Class Action and Claims Solutions CV

Epiq is a leading class action settlement administrator delivering best-in-class people, technology and service for class action administration matters anywhere in the world—regardless of size or complexity.

History:

Epiq has been administering settlements since 1993, including settlements of class actions, mass tort litigations, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered thousands of settlements, including some of the largest and most complex cases ever settled.

Epiq's class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment and implementation of notice fulfillment services, coordination with the United States Postal Service ("USPS"), electronic noticing, notice website development and maintenance, dedicated phone lines with recorded information and/or live operators, receipt and processing of opt-outs, claims database management, claim adjudication (paper and electronic), funds management, and award calculations and distribution services (both traditional checks and electronic payments). Epiq works with the settling parties, the Court, and the Class Members in a neutral facilitation role to implement administration services based on the negotiated terms of a settlement.

Through Hilsoft Notifications, our global provider of legal noticing services, we provide superior notice plan design, implementation, oversight, and communications for class action, mass tort, and bankruptcy proceedings. Hilsoft Notifications has been retained by defendants and/or plaintiffs on more than 300 cases, including more than 30 MDL cases, with notices appearing in more than 53 languages and in almost every country, territory and dependency in the world.

Epiq also has a Mass Tort division, which offers claimant communication support, medical record retrieval and review, plaintiff fact sheet fulfillment, settlement document fulfillment, lien resolution and fund administration and payments.

Strategically located:

- 12 dedicated offices providing project management and operational support including, New York City, New York; Beaverton, Oregon; Lake Success, New York; Dublin, Ohio; Seattle, Washington; Tampa, Florida; Phoenix, Arizona; Tallahassee, Florida, London UK, Memphis TN and Ottawa and Waterloo, Ontario.
- 3 state-of-the-art full-service mail, print, and contact centers in Beaverton, Oregon, Memphis, TN and Dublin, Ohio.
- 2,670 contact center seats across all locations.

COUNTY CLERK 04/29/2022

INDEX NO. 653594/2018

RECEIVED NYSCEF: 04/29/2022



NYSCEF DOC. NO. 1017

Epiq has been retained on some of the highest profile cases in history:

In re: Payment Card Interchange Fee and Merchant Discount Antitrust Litigation This \$6B+ settlement is one of the largest antitrust class action settlements of all time. Epig received roughly 80 billion rows of data with 163 types of data columns in 180 distinct files. The aggregated data set is over 110 terabytes and is hosted in a PCI-compliant environment. Over a five-month period this data was used to generate 21 million settlement notice mailings. This settlement is currently on appeal and therefore the claims process has not yet begun. However, in order to efficiently handle the anticipated claim volume, we implemented a pre-registration process that allows merchants to provide information to expedite the claims process prior to claim filing.

In re: Oil Spill by the Rig "Deepwater Horizon" Prior to settlement, Epiq acted as a shared database manager for the litigation, collecting data from plaintiffs' counsel, defense counsel, the Gulf Coast Claims Facility, and the court to create an aggregated system of record to manage all plaintiff data. Responsibilities included data intake and processing of all new forms filed on PACER and LexisNexis File & ServeXpress, loading partially complete data lists, identifying exceptions and mismatches and resolving missing data, duplicates and incorrect information for the parties. Epig's legal noticing division, Hilsoft Notifications, was then appointed as the notice administrator for both the \$7.8 billion economic damages and medical benefits settlements. Across a condensed six week period, Hilsoft ran notices nationally and locally in more than 2,000 print publications. Approximately 10,000 television and radio spots aired across 26 media markets stretching from Houston to Miami. In addition to English, notices appeared in Spanish and Vietnamese. It is estimated that more than 95% of all adults living in the Gulf Area and more than 83% of all adults in the United States had an opportunity to see the notice. In total, the notice effort was one of the largest ever undertaken in a class action settlement.

In re: Takata Airbag Products Liability Litigation Massive individual notice mailing to over 59 million class members with Toyota, Mazda, Subaru, BMW, Honda, Nissan and Ford vehicles, as part of \$1.49 billion in multiple settlements regarding Takata airbags. Comprehensive nationwide media accompanied each phase, comprised of radio ads, consumer magazine ads and extensive online notice.

In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Product Liability Litigation (Bosch Settlement) Comprehensive notice program within the Volkswagen Emissions Litigation that provided individual notice to more than 946,000 vehicle owners via first class mail and to more than 855,000 via email. A targeted internet campaign further enhanced the notice effort.

Hale v. State Farm Mutual Automobile Insurance Company For a \$250 million settlement with approximately 4.7 million class members, Epig designed and implemented a Notice Program with individual notice via postcard or email to approximately 1.43 million class members and a robust publication program, which combined, reached approximately 80% of all U.S. Adults Aged 35+ approximately 2.4 times each.

Oppenheimer Rochester Group Funds Securities Litigation In these securities cases, which combine six separate settlements, Epig reviewed and processed over 10 million trade transactions, consolidated data and mailed more than 450,000 pre-populated records of claimant transactions ("ROFTS") to alleviate the burden on the majority of class members to research and file claims, and mailed over 180,000 additional Claim Forms and notices. We created complex software code to calculate the recognized losses across 19 different types of securities.

In re Merck & Co., Inc. Securities, Derivative & "ERISA" Litigation ('Vioxx') Epiq is currently administering this \$1.062 billion settlement involving damages from securities trades going as far back as 1999. Epig mailed almost 2 million notices, received more than 400,000 claims and processed millions of lines of securities transaction data, determined losses using complex algorithms relating to multiple securities for injured investors.

FILED: NEW YORK COUNTY CLERK 04/29/2022 07:26 PM

NYSCEF DOC. NO. 1017

INDEX NO. 653594/2018

RECEIVED NYSCEF: 04/29/2022



Hooker v SiriusXM Radio Inc. This \$35 million settlement for alleged TCPA violations involves approximately 12 million class members. Class members could register for three months of free service or file a claim for cash payment. Epiq's class member outreach included both mailing approximately 8 million postcards and a total of 50 million emails to class members for noticing and reminder purposes. The claims administration process involved working with the defendant to validate claims data using the defendant's internal database.

The Shane Group, Inc. v Blue Cross Blue Shield of Michigan Epiq is the claims administrator for this 3 million class member insurance anti-trust settlement. Epiq utilized its proprietary Third-Party Payor (TPP) database to notice insurance companies and other third party payors in addition to the individual class members provided by the defendant. The claims process was complex and involved sensitive HIPAA protected data that had to be housed in a custom secure environment. The settlement was appealed and as a result the parties are currently finalizing alterations to the settlement to address the concerns of the appellant.

In re Checking Account Overdraft Litigation Epiq has implemented more In re: Checking Account Overdraft MDL NO. 2036 overdraft class action settlements than any other administrator and is currently providing settlement services to five of the six largest U.S. banks. Our ability to securely intake and normalize complex data from a multitude of sources proves a natural fit for banks and other financial services firms.

Mortgage Servicing Regulatory Settlement Summary Epiq is currently handling a number of remediation and distribution programs involving various financial institutions pursuant to private settlements and consent orders with the OCC, DOJ, FRB and CFPB. Examples of these engagements include:

- A borrower identification and distribution program to support a \$35 million Department of Justice (DOJ) and Consumer Financial Protection Bureau (CFPB) settlement with a financial institution related to mortgage loans made to African-American and Hispanic borrowers.
- A payment distribution program to support an expedited payment agreement between the Office of the Comptroller of the Currency (OCC) and a financial institution, which resolves an Independent Foreclosure Review of the financial institution's foreclosure practices.
- A notification, claims and distribution program to support a Federal Reserve settlement with a financial institution related to mortgage loans originated at more than 800 branch offices.
- A notification, claims and distribution program to support a \$320 million Home Affordable Modification Program (HAMP) settlement between the DOJ and a financial institution.

NYSCEF DOC. NO. 1017

INDEX NO. 653594/2018

RECEIVED NYSCEF: 04/29/2022



Experience in major projects by dollar value (values have been rounded)

•	•	•			
\$44.5B	Lehman Brothers Holding Inc	\$1.9B	1983 Marine Barrack's Bombings	\$480M	Wells Fargo Securities Litigation
\$11B	Deepwater Horizon Economic Settlement	\$1.3B	Hispanic Women and Farmers	\$473M	Schering Securities Litigation
\$8.5B	BNY Mellon Countrywide RMBS	\$1B	In re Merck & Co Inc. Securities Derivative & ERISA Litigation	\$389M	Royal Dutch Shell
\$6.15B	WorldCom Securities	\$860M	Johnson & Johnson Acuvue	\$384M	Wells Fargo CPI
\$5.5B	In Re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation	\$853M	Air Cargo Antitrust	\$328M	In re Volkswagen "Clean Diesel" (Bosch Settlement)
\$4.6B	Indian Residential Schools Settlement	\$850M	Marsh & McLennan	\$325M	Precision v. PWT ('Freight Forwarders')
\$4.5B	Bank of America Auction Rate Securities	\$845M	In re Urethane Antitrust	\$320M	SunTrust HAMP
\$4.5B	JP Morgan Chase RMBS	\$834M	Tremont Securities	\$299M	Takata Ford
\$3.4B	Indian Trust	\$800M	Engle Trust Fund	\$231M	US Embassy Bombings
\$3.2B	Tyco Securities	\$758M	In re Hyundai and Kia Engine Litigation	\$228M	Hall v Bank of America
\$3.05B	VisaCheck/Mastermoney Antitrust	\$750M	Washington Public Power Supply Systems	\$219M	Genworth Securities Litigation
\$3B	Petrobras Securities Litigation	\$750M	Bristol Myers Securities	\$215M	Merck Securities Litigation
\$2.6B	Morgan Stanley RMBS	\$730M	United States v. Pokerstars	\$212M	Wells Fargo Financial Consent Order
\$2.43B	Bank of America Corp. Securities Derivative & ERISA	\$590M	Klein, et al. v. Bain Capital Partners LLC, et al.	\$210M	In re Wilmington Trust Securities Litigation
\$2.1B	The Hepatitis C Tainted Blood Transfusion Settlements	\$520M	Jessica S. Cook v. Santee Cooper et al	\$210M	Salix Securities Litigation
\$2B	In re Foreign Exchange Benchmark Rates Antitrust Litigation	\$504M	ISDAfix Antitrust Settlement	\$200M	In re Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation
\$1.2B	Black Farmers Discrimination Litigation	\$504M	Bank of NY Mellon Forex	\$200M	In re New England Compounding Pharmacy Inc. Products Liability Litigation
\$1.10B	Royal Ahold Securities	\$480M	Gary Hefler, et al. v. Wells Fargo & Co. et al.	\$200M	NECC Victims Compensation Program

NYSCEF DOC. NO. 1017

INDEX NO. 653594/2018

RECEIVED NYSCEF: 04/29/2022



By notices disseminated (values have been rounded)

_ ,					
116,000,000	Ticketmaster.com	11,000,000	Premera Data Breach Settlement	4,600,000	1-800-Flowers Retail
57,000,000	Classmates.com	9,000,000	Pelayo v. Mexico Money Transfer	4,500,000	Progressive Group Auto Insurance
55,000,000	Hooker v Sirius XM Radio	9,000,000	Farrell v Bank of America	4,300,000	Chimeno-Buzzi v Hollister
53,000,000	Takata Settlement	9,000,000	Precision v PWT	4,100,000	Amex Merchant Settlement
32,000,000	Justice Stores-McGladrey	8,400,000	Air Passenger Settlement	4,000,000	WorldCom Securities
26,000,000	VisaCheck/MasterMoney Antitrust	8,300,000	Takata Ford	3,900,000	Scharfstein v BP WCP
25,000,000	IPO Securities	8,300,000	Marolda v Symantec	3,800,000	Clark v TransUnion
22,000,000	McKnight v Uber	8,300,000	Bank of America TCPA	3,700,000	Fifth Third Overdraft Settlement
21,000,000	Interchange	8,000,000	Meckstroth v Toyota Motor	3,700,000	Tennille v Western Union
20,500,000	Nwabueza v. AT&T	7,600,000	Vergara v. Uber TCPA Settlement	3,600,000	Bodnar v BofA
20,000,000	Webloyalty.com, Inc.	7,600,000	MFS Sub-Track Mutual Fund	3,500,000	Pfizer Securities Litigation
19,000,000	Interchange	7,100,000	TD Bank Debit Card Overdraft	3,500,000	IDE - UCLA Health
18,000,000	Western Union Money Transfer	7,000,000	Community HIth Sys DB	3,500,000	Bosch Settlement
16,000,000	Khoday v. Symantec	7,000,000	Time Warner Entertainment Company	3,500,000	Wells Fargo CPI Class Action
15,140,000	Experian Information Solutions, Inc.	7,000,000	AT&T Wireless	3,500,000	Michael Kors Administration
15,000,000	Farag v Kiip	7,000,000	Equifax Consumer Services, Inc.	3,400,000	Lucero v SolarCity TCPA Settlement
15,000,000	Browning v. Yahoo!	6,400,000	UCLA Health Data Breach Settlement	3,300,000	Snyder v Ocwen Loan Servicing
15,000,000	JP Morgan TCPA	6,400,000	Angies List	3,200,000	Hale v. State Farm
14,000,000	Living Social	5,700,000	Moore v Verizon	3,000,000	McKinney-Drobnis v Massage Envy
14,000,000	Sallie Mae	5,000,000	Mohan v. Dell	3,000,000	Amgen Securities Litigation
13,000,000	Expedia Hotel Taxes and Fees	5,000,000	Moneygram – Mexico Money Transfer		

INDEX NO. 653594/2018

RECEIVED NYSCEF: 04/29/2022



By claims processed (values have been rounded)

•	•				
4,300,000	Lease Oil Antitrust	670,000	Citigroup Inc. Securities	298,000	Snyder v Ocwen Loan Servicing
2,100,000	Strong Sub-Track Mutual Fund	618,000	TransUnion	275,000	TD Bank Debit Card Overdraft
1,960,000	Wolf v. Red Bull	607,000	Justice Stores-McGladrey	268,000	Merck Securities Litigation
1,200,000	Baby Products Antitrust	601,000	Dell Fair Fund	264,000	Carnegie v HR Block
1,051,000	Takata Settlement	600,000	Global Crossing Securities	256,000	Mohan v. Dell
1,000,000	AMEX Financial Advisors Securities	521,000	Expedia Hotel Taxes and Fees	250,000	Hill v State Street
995,000	Daniels v. Allstate	520,000	SEC v AIG	240,000	Toronto-Dominion Securities Litigation Settlement
980,000	WorldCom Securities	500,000	Nortel Networks (I & II) Securities	236,000	Bank of America TCPA
950,000	Gulf Coast Claims Facility	438,000	General Motors Securities Litigation	231,000	Apple Securities Litigation
880,000	Premera Data Breach Settlement	425,000	Amgen Securities Litigation	227,000	Purex Settlement
815,000	Progressive Fair Credit Reporting Act	414,000	Merck Vioxx Securities Litigation	206,000	Trombley v National City
815,000	VisaCheck/MasterMoney Antitrust	396,000	Zepeda v. PayPal	196,000	Marchese v Cablevision
760,000	Oppenheimer Funds Securities	394,000	Moore v Verizon	195,000	Toyota Securities Litigation
724,000	Wells Fargo Securities	389,000	Reynolds v Hartford	194,000	SEC v Raytheon
719,000	Bank of America Corp. Securities Derivative & ERISA	357,000	BNYM Forex Securities Litigation	182,000	Ridgely v FEMA
700,000	Lucent Technologies, Inc. Securities	325,000	Hooker v Sirius XM Radio	179,000	Royal Dutch Shell
698,000	Classmates.com	324,000	Air Passenger Settlement	178,000	Angies List
685,000	Deloris Kline v. Progressive Corporation	313,000	Cerbo v Ford of Englewood, Inc.	148,000	UCLA Health Data Breach Settlement
672,000	Oppenheimer Rochester Fund Securities Litigation	303,000	Wright et al v Nationstar Mort	144,000	Tennille v Western Union



Better together

Epiq is stronger than ever. Following the acquisition of GCG, our team is transforming the securities class action administration landscape with unparalleled resources and subject matter expertise. We provide our clients with immediate access to a deeper and broader platform of best-in-class settlement administration on a global scale.

Leading the field

Two of the largest settlement administrators in the country have come together to create an unprecedented Securities Center of Excellence. Together, we deliver scalability, expertise, and best-in-class administration for securities settlements – routine or complex. With more than 150 years of combined experience, Epiq is dedicated to providing a seamless, on-time, and on-budget administration with a specialized, knowledgeable, solution-oriented securities team.

Accurate and timely claims administration

Throughout its history, Epiq has been an industry leader in ensuring quality control and preventing fraudulent claims, without sacrificing timeliness. Claims analysts are adept at identifying potentially suspicious claims and investigating red flags for potentially fraudulent activity. By ensuring quality from document intake, through claims processing, and final quality assurance and fraud prevention reviews prior to disbursement, Epiq ensures that accurate awards are sent to class members.

50M+ notices sent

10M+ claims processed

\$25B+ total settlement value

settlements administered

800 111111

Dedicated employees delivering excellence to our clients

Securities Class Action Administration



Epiq has administered 52 of the top 100 securities settlements since the passage of the PSLRA, more than all other administrators combined.

Strategically located

- 12 dedicated offices providing project management and operational support including, New York City, New York; Beaverton, Oregon; Lake Success, New York; Dublin, Ohio; Seattle, Washington; Tampa, Florida; Phoenix, Arizona; Tallahassee, Florida, London UK, Memphis TN (coming soon) and Ottawa and Waterloo, Ontario.
- 3 state-of-the-art full-service mail, print, and contact centers in Beaverton, Oregon, Memphis, TN (coming soon) and Dublin, Ohio.
- 2,670 contact center seats across all locations.

Court-approved

"[Epig] is one of the leading claims administrators in the industry . . . [i]f not the leading."

U.S. District Judge: Wagner v. Barrick Gold Corp.,

"I find that [Epiq] compli[ed] with its typical procedures for claims administration and is going above and beyond its usual practices due to the size of the class in this action. I am satisfied that [Epig is] taking all necessary and reasonable steps to notify class members of their potential claims."

U.S. District Judge: In re: Initial Public Offering Securities Litigation

"I also appreciate the team of settlement administrators you assembled who have managed this process so well."

U.S. District Judge: In re Royal Ahold N.V. Securities & ERISA Litigation

dedicated offices

state-of-the-art full-service mail, print and contact centers

contact center seats

years of combined

People. Partnership. Performance.

Securities Createved Invided 10472972022

INDEX NO. 653594/2018

Securities Class Action Administration

Representative settlements \$300M or more:

WorldCom, Inc. \$6,194,100,714

Tyco International, Ltd. \$3,200,000,000

Bank of America Corporation (Equity Securities) \$2,425,000,000

In re Foreign Exchange Benchmark Rate Antitrust \$2,400,000,000

In re Credit Default Swaps Antitrust \$1,800,000,000

Nortel Networks Corp. (I) \$1,142,775,308

Royal Ahold, N.V. \$1,100,000,000

Nortel Networks Corp. (II) \$1,074,265,298

Merck & Co., Inc. \$1,060,000,000

Merch Vioxx \$830,000,000

SEC v. AIG \$800,000,000

Citigroup Bonds \$730,000,000

Merck/Schering Vytorin \$688,000,000

Lucent Technologies, Inc. \$667,000,000

Wachovia Preferred Securities and Bond/Notes \$627,000,000

Lehman Brothers Holdings, Inc. (Equity/ Debt Securities) \$615,218,000

Dahl. v. Bain (Private Equity) \$590,500,000

Citigroup, Inc. \$590,000,000

IPO Securities Litigation (Master Case) \$585,999,996

Alaska Electrical Pension Fund v. Bank of America, et al. (Isdafix) \$504,500,000

Bear Stearns Mortgage Pass-Through Certificates \$500,000,000

Countrywide Financial Corp. \$500,000,000

Pfizer, Inc. \$486,000,000

Global Crossing, Ltd. \$447,800,000

Federal Home Loan Mortgage Corp. (Freddie Mac) \$410,000,000

Royal Dutch Shell \$385,000,000

Refco, Inc. \$358,300,000

RALI Mortgage (Asset-Backed Pass-Through Certificates) (Underwriter Defendants) \$335,000,000

Merrill Lynch Mortgage Investors, Inc. (Mortgage Pass-Through Certificates) \$315,000,000

Williams Companies, Inc. \$311,000,000

General Motors Corp. \$303,000,000

DaimlerChrysler AG \$300,000,000

General Motors Company \$300,000,000

Bristol-Myers Squibb Co. \$300,000,000

Oxford Health Plans Inc. \$300,000,000

Epig is trusted by the most prominent securities class action firms including:

Barrack Rodos & Bacine Berger & Montague, P.C.

Berman Tabacco

Bernstein Litowitz Berger &

Grossmann LLP

Bleichmar Fonti & Auld LLP

Block & Leviton LLP Brower Piven, PC

Cohen Milstein Sellers & Toll, PLLC Cotchett, Pitre & McCarthy, LLP

Entwistle & Cappucci LLP Faruqi & Faruqi LLP

Gardy & Notis LLP

Girard Gibbs LLP

Glancy Prongay & Murray LLP Grant & Eisenhofer, PA

Hagens Berman Sobol Shapiro LLP

Kahn Swick & Foti LLC Kaplan Fox & Kilsheimer LLP

Kessler Topaz Meltzer & Check LLP

Kohn Swift & Graf PC

Labaton Sucharow LLP Levi & Korsinsky LLP

Lowenstein Sandler PC

Milberg Tadler Phillips & Grossman LLP

Motlev Rice LLC Newman Ferrara LLP

Nix Patterson & Roach LLP

Pomerantz LLP

Quinn Emanuel Urguhart & Sullivan, LLP

Robbins Geller Rudman & Dowd LLP

Robins Kaplan LLP

The Rosen Law Firm, PA

Saxena White P.A.

Scott + Scott LLP

Siskinds LLP

Spector Roseman & Kodroff, PC

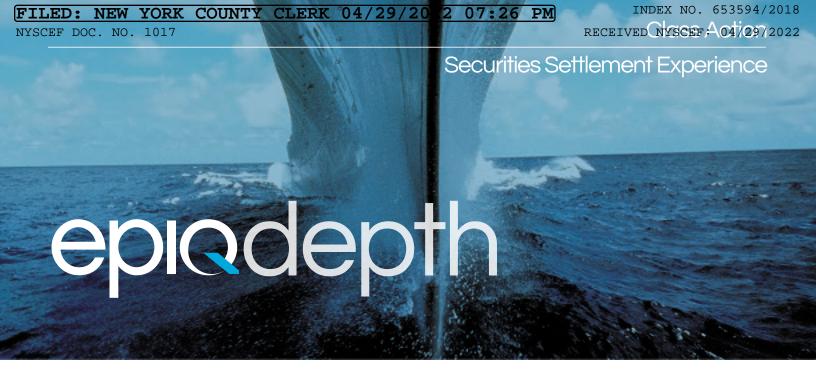
Strosberg Sasso Sutts LLP

Stull, Stull & Brody

United States Securities & Exchange

Commission

Wolf Popper LLP



With decades of experience administering some of the largest and most complex securities class action settlements, Epiq is distinctively situated to ensure a seamless, on-time and on-budget administration.

Securities settlements are unique. Experience handling complex financial data is critical as is high-security around sensitive financial data.

What we offer

Deep relationships and resources. Our seasoned, committed and highly responsive staff includes attorneys with securities class action experience, business analysts with close working relationships with the larger brokers/nominees, and project managers with a collective 100+ years of experience in settlement administration.

Robust security. Our information security function utilizes ISO 27001/2, NIST, FISMA, multiple international privacy regulations, and other control frameworks to ensure controls are in place and effective beyond a singular program. All client data is housed in at least a Tier 3 SSAE 16/SOC certified co-located data center within private, locked cages. Internal and third-party monitoring is in place to ensure consistent operation of these structures and processes.

Unsurpassed quality. Quality controls and checks and balances are built into every stage of each administration. By ensuring accuracy from notice disbursement through claims processing, and performing rigorous quality control procedures prior to fund distribution, Epiq ensures that accurate awards are sent to investors.

People. Partnership. Performance.

epigglobal.com

How we deliver

Plan. Expert consultants partner with clients to develop a comprehensive project plan, define repeatable procedures and assemble a dedicated case team that meets project requirements.

Execute. As the plan is implemented, you have immediate access to your dedicated Epiq team leader. We are fully staffed with a quality control team to ensure conformity with all relevant court orders, plans of allocation and settlement agreements.

Report. We provide the highest level of efficient client service and transparency and provide timely, accurate project reports. Intelligent importing and data validation processes flag deficient claims upfront, so no time is wasted processing invalid claims. We carefully monitor timelines to ensure that every stage of claims processing runs on schedule.

Securities Settlement Experience

Representative cases

Securities and Exchange Commission v. American International Group, Inc.: More than 2 million notices mailed; over 500,000 claims processed; 419 different securities; approximately 400,000 payments sent; more than \$920 million disbursed.

Merck/Schering Securities Litigations (Vytorin):

\$688 million combined settlements; approximately 1.5 million notices mailed; more than 400,000 claims processed; common stock, preferred stock, call options, put options; more than \$530 million disbursed to injured investors.

General Motors Securities Litigation: \$303 million settlement; more than 1.8 million notices mailed; more than 400,000 claims processed; 32 eligible securities; approximately \$260 million disbursed.

Oppenheimer Municipal Bond Fund Settlements:

Six combined settlements totaling \$89.5 million; approximately 650,000 notices mailed (including more than 460,000 pre-populated claim forms); 19 share classes across six mutual funds; over \$57 million disbursed

WorldCom Securities Settlement: \$6.19 billion settlement involving 14 separate settlements; four separate pools of settlement funds; over 40 eligible securities.; notice materials to roughly five million people on three separate occurrences.

Royal Ahold Securities: Multinational, \$1.1 billion settlement; nearly 250,000 claims received and processed from over 100 countries; notice mailed to 24 countries; claim packets translated into 16 languages; hundreds of thousands of payments processed through the Dutch Equens system.

In the Matter of Oppenheimer Funds, Inc. and Oppenheimer Funds Distributor, Inc.: SEC

Administrative Proceeding with a \$35.5 million Fair Fund; approximately 397,000 notices mailed; over 322,000 claims processed; over \$34 million disbursed to approximately 157,000 eligible claimants.

Tyco International Ltd. Securities Litigation: \$3.2 billion settlement involving common stock; 35 debt securities, put and call options; more than 480,000 claims processed.

In re Bank of New York Mellon Corp. FX Securities

Action: \$180 million settlement; approximately 963,000 notices mailed; more than 350,000 claims processed.

Dahl v Bain Capital Partners / Private Equity

Litigation: \$590.5 million combined settlements with multiple defending companies and securities; approximately 519,000 notices mailed; more than 124,000 claims processed; over \$385 million disbursed.

In re Merck & Co., Inc. Securities, Derivative & "Erisa" Litigation (Vioxx): Over \$1 billion settlement; approximately 1,900,000 notices mailed. Over 400,000 claims processed; order approving distribution entered on 9/13/18.

Epiq is trusted by the most prominent securities class action firms including:

Barrack Rodos & Bacine Berger & Montague, P.C. Berman Devalerio PC Bernstein Litowitz Berger &

Grossmann LLP

Bleichmar Fonti & Auld LLP

Brower Piven, PC

Cohen Milstein Sellers & Toll. PLLC

Entwistle & Cappucci LLP

Girard Gibbs LLP

Glancy Prongay & Murray LLP

Grant & Eisenhofer, PA

Hagens Berman Sobol Shapiro LLP

Kahn Swick & Foti LLC

Kaplan Fox & Kilsheimer LLP

Kessler Topaz Meltzer & Check LLP

Kohn Swift & Graf PC

Labaton Sucharow LLP

Levi & Korsinsky LLP

Lowenstein Sandler PC

Milberg LLP

Motley Rice LLC

Newman Ferrara LLP

Nix Patterson & Roach LLP

Pomerantz LLP

Robbins Geller Rudman & Dowd LLP

Robins Kaplan LLP

The Rosen Law Firm, PA

Saxena White P.A.

Scott + Scott LLP

Spector Roseman & Kodroff, PC

Stull, Stull & Brody

United States Securities & Exchange

Commission

Wolf Popper LLP

People. Partnership. Performance.