

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

ROBERT MURRAY, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

vs.

EARTHLINK HOLDINGS CORP., et al.

Defendants.

) No. 4:18-cv-00202-JM

)
) CLASS ACTION

) SUPPLEMENTAL DECLARATION OF
) ROSS D. MURRAY REGARDING NOTICE
) DISSEMINATION AND REQUESTS FOR
) EXCLUSION RECEIVED TO DATE

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC, a Verita Global company (“Verita Global”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s October 16, 2024 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”) (ECF 186), Verita Global was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned action (the “Action”).¹ I oversaw the notice services that Verita Global provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (the “Initial Mailing Declaration”) (ECF 195). The following statements are based on my personal knowledge and information provided to me by other Verita Global employees and if called to testify I could and would do so competently.

UPDATE ON DISSEMINATION OF NOTICE

3. As more fully detailed in the Initial Mailing Declaration, as of December 30, 2024, Verita Global had mailed or emailed a total of 93,549 Claim Packages to potential Settlement Class Members and their nominees. Additionally, Verita Global received messages from two institutions noting that they anticipated sending Claim Packages via email to 25,711 potential Settlement Class Members. *See* Initial Mailing Declaration, ¶10.

4. Since December 30, 2024, Verita Global has mailed or emailed an additional 642 Claim Packages in response to requests from potential Settlement Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of January 29, 2025, Verita Global has mailed or emailed a total of 94,191 Claim Packages to potential Settlement Class Members and nominees.

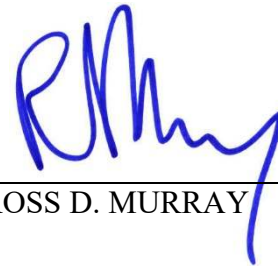
¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation of Settlement dated September 4, 2024 (the “Stipulation”) (ECF 182), which is available on the website established for the Settlement at www.EarthLinkMergerSettlement.com.

REQUESTS FOR EXCLUSION RECEIVED TO DATE

5. Pursuant to the Notice Order, the Notice informs potential Settlement Class Members that written requests for exclusion from the Settlement Class must be mailed to *EarthLink Merger Settlement*, Claims Administrator, c/o Gilardi, a Verita Global company, EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100, such that they are postmarked or received no later than January 16, 2025. At the time of the Initial Mailing Declaration, Verita Global reported that it had not received any requests for exclusion in connection with this Settlement. See Initial Mailing Declaration, ¶15.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Verita Global has not received any requests for exclusion in connection with this Settlement.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 29th day of January, 2025, at San Rafael, California.



ROSS D. MURRAY