

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

1			
2	RIGOBERTO SANDOVAL,	:	Civil Action
3	individually and as a representative of a class of	:	No. 3:17-cv-1573 (MPS)
4	similarly situated plan participants and	:	
5	beneficiaries, on behalf of the	:	
6	EXELA 401(k) PLAN,	:	
7	the successor-in-interest of the	:	
8	NOVITEX ENTERPRISE SOLUTIONS	:	
9	RETIREMENT SAVINGS PLAN,	:	
10		:	
11	Plaintiff,	:	
12		:	
13	vs.	:	
14		:	
15	EXELA ENTERPRISE SOLUTIONS, INC.,	:	
16	NOVITEX ENTERPRISE SOLUTIONS	:	
17	EMPLOYEE BENEFITS COMMITTEE	:	
18	and DOES NO. 1-10, Whose Names Are	:	
19	Currently Unknown,	:	
20		:	
21	Defendants.	:	
22		:	

**DECLARATION OF CORNELIA VIEIRA CONCERNING
THE MAILING OF THE SETTLEMENT NOTICE AND FORMER
PARTICIPANT CLAIM FORM, AND MAILING OF CAFA NOTICE**

I, Cornelia Vieira, declare:

1. I am a Project Manager of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over three years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over four-hundred and fifty (450) class action cases since its inception. I am over 21 years of age and am not a party to this Litigation. I have personal knowledge of the facts set forth herein.

1 2. I respectfully submit this declaration in order to provide the Court and the
2 parties to the Litigation with information regarding the mailing of the Notice to inform
3 Class Members of the Settlement.

4 3. SCS was approved by the Court as Settlement Administrator in the above-
5 captioned litigation. Our services include (i) organizing the printing and mailing of Notice
6 to 6,954 Class Members; (ii) establishing and maintaining the settlement website,
7 www.strategicclaims.net/sandoval401k; (iii) setting-up and updating a database listing the
8 names and addresses of Class Members and updating addresses as needed; (iv) re-mailing
9 Notices returned with forwarding addresses; (v) recording all returned Notices as
10 undeliverable with no forwarding addresses and skip tracing them through Experian to
11 obtain new addresses, and re-mailing those Notices where updated addresses are obtained;
12 (vi) issuing the Summary Notice as a national press release via PRNewswire; (vii) tracking
13 objections; (viii) entering and processing filed Former Participant Claim Forms; (ix)
14 responding to phone call inquiries received on the toll-free line; and (x) handling all
15 correspondence related to the above procedures.
16
17

18 4. In order to provide actual notice to those Class Members identified as all
19 participants and beneficiaries of the Novitex Plan prior to the merger of the Novitex Plan
20 with the SourceHOV 401(k) Plan, at any time on or after January 1, 2014, through and
21 including December 31, 2018, and any alternate payees, in the case of a person subject to
22 a QDRO who was a participant in the Novitex Plan at any time during the Class Period,
23 SCS mailed, by first class mail, the court approved Notice to 6,954 individuals. The
24 original list was run through the United States Postal Service national change of address
25 service to obtain new address information prior to the initial mailing. The 6,954 Notices
26
27
28

1 were mailed on June 25, 2021 as required by the Court's Preliminary Approval Order dated
2 April 26, 2021 (the "Court's Order"). Please see **Exhibit A** for a copy of the Notice. As
3 part of the Notice mailing, 2,944 Class Members identified as non-active in the class data
4 were mailed a Former Participant Claim Form along with their Notice. Please see **Exhibit**
5 **B** for a copy of the Notice and Claim Form.

6 5. On June 25, 2021, SCS established the website for the Settlement,
7 www.strategicclaims.net/sandoval401k. The website contains the current status of the
8 case; the deadlines for objections and claims filing; the date of the Final Approval Hearing;
9 Frequently Asked Questions; and downloadable copies of the following documents: (i)
10 Notice, (ii) Former Participant Claim Form, (iii) the Court's Order, (iv) the Court
11 Transcript of the Preliminary Approval Conference Call, (v) Plaintiff's Motion for
12 Preliminary Approval, (vi) Amended Settlement Agreement and Release, and (vii) the
13 Second Amended Complaint.
14

15 6. On June 25, 2021, SCS made available a toll-free phone number (866-274-
16 4004), which was included in the Notice, to which Class Members can direct questions
17 about the Settlement.
18

19 7. On June 25, 2021, SCS issued the Summary Notice as a national press
20 release via PRNewswire as per the Court's Order. Please see **Exhibit C** showing
21 confirmation of publication.
22

23 8. The notice procedures described in paragraphs three (3) through seven (7)
24 above are consistent with the notice procedures I have used in class action cases with which
25 I have been involved over the past three years.
26
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1 9. To date, SCS has not received any objections to the fairness, reasonableness
2 or adequacy of the Settlement, to any terms of the Settlement Agreement, or to proposed
3 Administrative Expenses, Attorneys' Fees and Costs, or Class Representative's
4 Compensation. The deadline by which objections must be postmarked is August 15, 2021.

5 10. Over 4,000 Class Members will automatically receive the benefit of the
6 Settlement. To date, SCS has not received any Former Participant Claim Forms. The
7 deadline for submitting the Former Participant Claim Form is August 24, 2021.

8 11. At the request of Defendants' Counsel, and separate from our engagement
9 as Claims Administrator, on May 3, 2021, SCS mailed a notice of proposed class action
10 settlement, pursuant to Section 1715 of the Class Action Fairness Act of 2005, 28 U.S.C.
11 §§ 1332(d), 1453, and 1711-1715 ("CAFA"), to the appropriate federal and state officials,
12 by certified mail, return receipt requested, through the United States Postal Service. The
13 mailing consisted of: (i) a letter regarding the Settlement approved by Defendants' Counsel
14 describing the mailing (the "CAFA Letter"), and (ii) a CD-ROM containing copies of the
15 documents referenced in the CAFA Letter. Attached as **Exhibit D** is a copy of the CAFA
16 Letter that SCS mailed.
17
18

19 12. SCS provided a full accounting of expenditures made in connection with
20 the Settlement, and it provided any and all information that was requested by the Parties or
21 their counsel.
22

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Signed this 6th day of July 2021, in Media, Pennsylvania.

25
26 
27 _____
28 Cornelia Vieira

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

If you were a participant in the Novitex Enterprise Solutions Retirement Savings Plan between January 1, 2014 and December 31, 2018, your legal rights will be affected by this class action settlement.

The case is called Rigoberto Sandoval v. Exela Enterprise Solutions, Inc., et al., No. 3:17-cv-1573 (MPS) (D. Conn.). A Court authorized this Notice. This is not a solicitation from a lawyer.

This Notice advises you of the settlement (“Settlement”) of a lawsuit against Exela Enterprise Solutions, Inc. (“Exela”) and the Novitex Enterprise Solutions Employee Benefits Committee (“Committee”) (collectively, “Defendants”) (Plaintiff with Defendants, the “Parties”). In the lawsuit, Plaintiff, Rigoberto Sandoval (“Plaintiff”), alleges that Defendants violated the Employee Retirement Income Security Act of 1974 (“ERISA”) by, among other things, failing to perform proper oversight of the former Novitex Enterprise Solutions Retirement Savings Plan (“Novitex Plan”), which was terminated in December 2018 and its assets merged with those of the Source HOV 401(k) Plan to form the Exela 401(k) Plan (“Exela Plan”). Defendants deny these allegations and deny that they engaged in any improper conduct. **YOU SHOULD READ THIS ENTIRE NOTICE CAREFULLY BECAUSE YOUR LEGAL RIGHTS WILL BE AFFECTED, WHETHER YOU ACT OR NOT.**

Your rights and options, and the deadline for you to object if you are opposed to the Settlement, are explained in this Notice

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BASIC INFORMATION

1. Why did I get this Notice?

You have been identified as a Participant, Former Participant, Beneficiary or Alternate Payee of a Participant or Former Participant, of the Novitex Plan at any time on or after January 1, 2014, through and including December 31, 2018 (the “Class Period”).

You are receiving this Notice because you have a right to know about the proposed Settlement of a class action lawsuit in which you are a Class Member before the Court decides whether to approve the Settlement.

This Notice summarizes the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible to receive them, and how to get them.

The lawsuit is pending in the United States District Court for the District of Connecticut (the “Court”). It is known as *Rigoberto Sandoval v. Exela Enterprise Solutions, Inc., et al.*, No. 3:17-cv-1573 (MPS) (D. Conn.), and is brought against Defendants.

2. What is this lawsuit about?

On September 20, 2017, Plaintiff filed an action against Defendants, alleging that they violated ERISA by, among other things, failing to perform proper oversight of the Novitex Plan. Since the filing of the action, the parties engaged in litigation, including amending the pleadings to reflect the termination of the Novitex Plan at the end of 2018, exchanging substantial documentation and engaging in extensive fact and expert discovery, and briefing motions to dismiss and for class certification. In December 2020, the Parties mediated the action and ultimately were able to reach the terms of the Settlement explained in this Notice. Defendants have denied and continue to deny any wrongdoing or liability and would continue to vigorously defend the lawsuit if the proposed Settlement is not approved.

3. What is a class action lawsuit?

In a class action lawsuit, one or more people called “class representatives” sue on their own behalf and on behalf of other people who they allege may have similar claims. One court resolves all the issues for all class members in a single lawsuit. Plaintiff is the class representative in this lawsuit, and is sometimes referred to in this Notice as the “Class Representative” or as “Plaintiff.”

4. Why is there a Settlement?

The Parties have agreed to the Settlement after extensive negotiations. By agreeing to a settlement, the Parties avoid the costs and risks of further litigation, and Plaintiff and the other members of the Class will receive compensation. Class Counsel have conducted an extensive review of the evidence in the case and the potential risks and benefits of continued litigation. Plaintiff and Class Counsel agree that the Settlement is in the best interest of the Class. The Court has not made any finding that Defendants have done anything wrong or violated any law or regulation.

5. How do I get more information about the Settlement?

This notice summarizes the proposed settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement (“Agreement”) available at www.strategicclaims.net/sandoval401k, by contacting Class Counsel (*see* answer to question 12 for contact information) or the Settlement Administrator (*see* answer to question 6 for contact information), by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.ctd.uscourts.gov/>.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

6. Who will administer the Settlement?

The Settlement Administrator, Strategic Claims Services, will administer the Settlement, including the processing of the Former Participant Claim Form, if applicable, that you may need to fill out and send in to receive any settlement payment. You may contact the Settlement Administrator by: (a) sending a letter to Sandoval 401k Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson St #205, Media, PA 19063; (b) sending an e-mail to info@strategicclaims.net; (c) visiting the Settlement website at www.strategicclaims.net/sandoval401k; or (d) calling toll-free at 866-274-4004.

THE SETTLEMENT BENEFITS – WHAT DOES THE SETTLEMENT PROVIDE

7. What does the Settlement provide?

Defendants have agreed to pay a total of \$750,000 to the Class Members, with up to 25% of that amount to be paid to Class Counsel in attorneys' fees and expenses to the extent approved by the Court and \$15,000 to be paid to the Class Representative, to the extent approved by the Court. The amount that will be available for distribution to Class Members (known as the "Net Settlement Amount") will be the Settlement Amount *minus* the amounts used for other Settlement purposes (Case Contribution Fee, Court-approved Attorneys' Fees and Expenses to Class Counsel, Administration Expenses, and certain taxes and tax-related costs).

8. How may I benefit from the Settlement?

You may benefit by receiving payment of a portion of the Net Settlement Amount. The amount paid to each current Participant and Authorized Former Participant will be determined by a Plan of Allocation. As explained below, if you are a current Participant, or Beneficiary or Alternate Payee of a Participant and you have an active account in the Exela Plan, you do not need to take any action in order to receive payment under the Settlement. If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, you will need to submit a Former Participant Claim Form by the deadline for submission in order to receive payment under the Settlement. Payments made to current Participants, or to Beneficiaries or Alternate Payees of a current Participant who have active accounts in the Exela Plan under the Settlement shall be made into these persons' individual investment accounts in the Plan. Payments made to Authorized Former Participants, or to Beneficiaries or Alternate Payees of Former Participants who do not have active accounts in the Plan under the Settlement may be made either by check or tax-qualified rollover to an individual retirement account or other eligible employer plan.

9. How do I submit a claim for a Settlement Payment?

If you are a current Participant, or a Beneficiary or Alternate Payee of a current Participant and you have an active account in the Exela Plan, you do not need to submit a claim to be eligible for a payment under the Settlement. Your payment amount will automatically be calculated by the Settlement Administrator. If you are a Former Participant, or a Beneficiary or an Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, you must submit a Former Participant Claim Form by the deadline for submission in order to be eligible for a payment under the Settlement. "Former Participant" means a person who had an account in the Novitex Plan during the Class Period and who did not have account in the Exela Plan with a balance greater than \$0 as of April 26, 2021.

If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, and want to receive any monetary benefits from the Settlement, you must submit the Former Participant Claim Form by no later than August 24, 2021. You must mail the Former Participant Claim Form to the address shown on the Form.

A Former Participant Claim Form will be deemed submitted when it is actually received by the Settlement Administrator at the address listed in the Form.

EVEN IF YOU DO NOT SUBMIT A FORMER PARTICIPANT CLAIM FORM, YOU WILL BE BOUND BY THE SETTLEMENT. (See answer to question 14 below.)

10. What is the Plaintiff receiving from the Settlement?

Class Counsel intends to ask the Court to award the Class Representative a Case Contribution Fee of \$15,000 in recognition of the work and effort he expended on behalf of the Class.

THE SETTLEMENT BENEFITS – WHAT YOU GIVE UP

11. What do I give up by participating in the Settlement?

Each Member of the Class gives Defendants a "release." A release means you give up your rights to sue Defendants or receive any benefits from any other lawsuit against Defendants if the lawsuit asserts claims or relates in any way to the practices at issue in this lawsuit.

For additional details about the scope of the release, consult the Agreement or contact Class Counsel. (See answer to question 5 for details.)

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court has appointed the law firm of Miller Shah LLP as Class Counsel. You will not be charged for the work of these lawyers. If you want to be represented by a different lawyer in this case, you may hire one at your own expense.

13. How will the lawyers (Class Counsel) be paid?

Class Counsel will ask the Court for an award of attorneys' fees and expenses of up to 25% of the Settlement Amount based upon the value of the Settlement, the time they have devoted to this engagement, and the expenses they have advanced in prosecuting this matter.

OPTING OUT OF THE SETTLEMENT

14. Can I exclude myself from the Class?

No. The Class has been certified under Federal Rule of Civil Procedure 23(b)(1). Therefore, as a Class Member, you are bound by any judgments or orders that are entered in the lawsuit for all claims that were asserted in the lawsuit or are otherwise included as Released Claims as defined in the Agreement. If you wish to object to any part of the Settlement, you may (as discussed below) write to the Court and counsel about why you object to the Settlement.

OBJECTING TO THE SETTLEMENT

15. What does it mean to object?

Objecting is simply telling the Court that you do not like something about the Settlement. Objecting will not have any bearing on your right to receive the benefits of the Settlement if it is approved by the Court.

16. What is the procedure for objecting to the Settlement, including any objection to Class Counsel's Motion for Attorneys' Fees and Expenses or Case Contribution Award?

You can ask the Court to deny approval of the Settlement and/or the Motion for Attorneys' Fees and Expenses of Class Counsel or the Case Contribution Award to be requested for the Class Representative by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object. The Court, however, can award less than the amount requested by Class Counsel for attorneys' fees and expenses or the amount requested for the case contribution award and, if the Court does so, because of an objection or in its own discretion, although that ruling could affect the timing and amount of settlement payments, any such objection to or reduction in Class Counsel's attorneys' fees and expenses or case contribution fees to be paid to the Class Representative would not otherwise affect the finality of the Settlement.

Any objection to the proposed Settlement or Motion for Attorneys' Fees and Expenses or Case Contribution Award must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must (a) clearly identify the case name and number *Rigoberto Sandoval v. Exela Enterprise Solutions, Inc., et al.*, No. 3:17-cv-1573 (MPS) (D. Conn.), (b) be submitted to the Court either by mailing them to the Clerk of the Court for the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, United States Courthouse, 450 Main Street, Hartford, Connecticut 06103, or by filing them in person at any location of the United States District Court for the District of Connecticut, and (c) be filed or postmarked on or before August 15, 2021. Your objection must also include (1) your full name, current address, and current telephone number, and, if represented by counsel, any of your counsel's name and contact information; (2) whether the objection applies only to the objecting Class Member, to a specific subset of the Class, or to the entire Class; (3) a statement of the position(s) the objector wishes to assert; (4) copies of any other documents that the objector wishes to submit in support of his/her/its position; and (5) a list of any other objections to any class action settlements submitted in any court, whether state, federal, or otherwise, in the United States in the previous five (5) years.

ANY CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED ABOVE SHALL BE DEEMED TO HAVE WAIVED ANY OBJECTION AND SHALL NOT HAVE ANY RIGHT TO OBJECT TO THE FAIRNESS OR ADEQUACY OF THE SETTLEMENT.

Clerk of the Court

U.S. District Court for the District
of Connecticut
Clerk of Court
Abraham Ribicoff Federal
Building
United States Courthouse
450 Main Street, Hartford,
Connecticut 06103

Class Counsel

James E. Miller
Miller Shah LLP
65 Main Street
Chester, CT 06412
Tel: (866) 540-5505

Defense Counsel

Meaghan VerGow
O'Melveny & Myers LLP
1625 Eye Street NW
Washington, D.C. 20017
Telephone: (202) 383-5300

THE COURT'S FAIRNESS HEARING

17. When/where will the Court decide whether to approve the Settlement?

On September 14, 2021 at 10:00 a.m., in the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, United States Courthouse, 450 Main Street, Hartford, Connecticut 06103, the Court will hold a Fairness Hearing to determine whether the proposed Settlement is fair, reasonable, and adequate and whether it should be approved. The hearing may be continued from time to time by the Court without further notice, and may be held via teleconference or videoconference. Please check the website or contact Class Counsel if you wish to confirm that the hearing time has not been changed and to determine if it is occurring in person or by video or teleconference.

18. Do I have to attend the Fairness Hearing?

No; however, you are welcome to attend at your own expense. If you file an objection to the Settlement, you do not have to go to Court to talk about it. As long as your objection is filed by August 15, 2021 and you comply with the requirements in answer to question 16 above, the Court will consider it. You also may send your own lawyer to attend the Fairness Hearing.

19. May I speak at the Fairness Hearing?

You may ask the Court for permission to speak at the hearing. Anyone wishing to appear must state in their written objection their intention to appear at the Fairness Hearing, at your own expense.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

YOU AND ALL OTHER CLASS MEMBERS WILL BE BOUND BY THE JUDGMENT AND SETTLEMENT AGREEMENT, INCLUDING THE RELEASE OF CLAIMS, IF YOU DO NOTHING. If you are a current Participant, or a Beneficiary or Alternate Payee of a Participant and you have an active account in the Exela Plan, you do not need to take any action to be eligible to receive the Settlement benefits. If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, you must submit a Former Participant Claim Form by the submission deadline or you will not receive any of the settlement payments described above in answer to questions 7 and 8.

DATED: June 25, 2021

**THIS NOTICE HAS BEEN SENT TO YOU BY ORDER
OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

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Sandoval 401k Settlement Administrator
c/o Strategic Claims Services
600 N. Jackson St., Ste. 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

Mail id
Name
Address
City, State, ZIP

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

If you were a participant in the Novitex Enterprise Solutions Retirement Savings Plan between January 1, 2014 and December 31, 2018, your legal rights will be affected by this class action settlement.

The case is called Rigoberto Sandoval v. Exela Enterprise Solutions, Inc., et al., No. 3:17-cv-1573 (MPS) (D. Conn.). A Court authorized this Notice. This is not a solicitation from a lawyer.

This Notice advises you of the settlement (“Settlement”) of a lawsuit against Exela Enterprise Solutions, Inc. (“Exela”) and the Novitex Enterprise Solutions Employee Benefits Committee (“Committee”) (collectively, “Defendants”) (Plaintiff with Defendants, the “Parties”). In the lawsuit, Plaintiff, Rigoberto Sandoval (“Plaintiff”), alleges that Defendants violated the Employee Retirement Income Security Act of 1974 (“ERISA”) by, among other things, failing to perform proper oversight of the former Novitex Enterprise Solutions Retirement Savings Plan (“Novitex Plan”), which was terminated in December 2018 and its assets merged with those of the Source HOV 401(k) Plan to form the Exela 401(k) Plan (“Exela Plan”). Defendants deny these allegations and deny that they engaged in any improper conduct. **YOU SHOULD READ THIS ENTIRE NOTICE CAREFULLY BECAUSE YOUR LEGAL RIGHTS WILL BE AFFECTED, WHETHER YOU ACT OR NOT.**

Your rights and options, and the deadline for you to object if you are opposed to the Settlement, are explained in this Notice

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BASIC INFORMATION

1. Why did I get this Notice?

You have been identified as a Participant, Former Participant, Beneficiary or Alternate Payee of a Participant or Former Participant, of the Novitex Plan at any time on or after January 1, 2014, through and including December 31, 2018 (the “Class Period”).

You are receiving this Notice because you have a right to know about the proposed Settlement of a class action lawsuit in which you are a Class Member before the Court decides whether to approve the Settlement.

This Notice summarizes the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible to receive them, and how to get them.

The lawsuit is pending in the United States District Court for the District of Connecticut (the “Court”). It is known as *Rigoberto Sandoval v. Exela Enterprise Solutions, Inc., et al.*, No. 3:17-cv-1573 (MPS) (D. Conn.), and is brought against Defendants.

2. What is this lawsuit about?

On September 20, 2017, Plaintiff filed an action against Defendants, alleging that they violated ERISA by, among other things, failing to perform proper oversight of the Novitex Plan. Since the filing of the action, the parties engaged in litigation, including amending the pleadings to reflect the termination of the Novitex Plan at the end of 2018, exchanging substantial documentation and engaging in extensive fact and expert discovery, and briefing motions to dismiss and for class certification. In December 2020, the Parties mediated the action and ultimately were able to reach the terms of the Settlement explained in this Notice. Defendants have denied and continue to deny any wrongdoing or liability and would continue to vigorously defend the lawsuit if the proposed Settlement is not approved.

3. What is a class action lawsuit?

In a class action lawsuit, one or more people called “class representatives” sue on their own behalf and on behalf of other people who they allege may have similar claims. One court resolves all the issues for all class members in a single lawsuit. Plaintiff is the class representative in this lawsuit, and is sometimes referred to in this Notice as the “Class Representative” or as “Plaintiff.”

4. Why is there a Settlement?

The Parties have agreed to the Settlement after extensive negotiations. By agreeing to a settlement, the Parties avoid the costs and risks of further litigation, and Plaintiff and the other members of the Class will receive compensation. Class Counsel have conducted an extensive review of the evidence in the case and the potential risks and benefits of continued litigation. Plaintiff and Class Counsel agree that the Settlement is in the best interest of the Class. The Court has not made any finding that Defendants have done anything wrong or violated any law or regulation.

5. How do I get more information about the Settlement?

This notice summarizes the proposed settlement. For the precise terms and conditions of the Settlement, please see the Settlement Agreement (“Agreement”) available at www.strategicclaims.net/sandoval401k, by contacting Class Counsel (*see* answer to question 12 for contact information) or the Settlement Administrator (*see* answer to question 6 for contact information), by accessing the Court docket in this case, for a fee, through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.ctd.uscourts.gov/>.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

6. Who will administer the Settlement?

The Settlement Administrator, Strategic Claims Services, will administer the Settlement, including the processing of the Former Participant Claim Form, if applicable, that you may need to fill out and send in to receive any settlement payment. You may contact the Settlement Administrator by: (a) sending a letter to Sandoval 401k Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson St #205, Media, PA 19063; (b) sending an e-mail to info@strategicclaims.net; (c) visiting the Settlement website at www.strategicclaims.net/sandoval401k; or (d) calling toll-free at 866-274-4004.

THE SETTLEMENT BENEFITS – WHAT DOES THE SETTLEMENT PROVIDE

7. What does the Settlement provide?

Defendants have agreed to pay a total of \$750,000 to the Class Members, with up to 25% of that amount to be paid to Class Counsel in attorneys' fees and expenses to the extent approved by the Court and \$15,000 to be paid to the Class Representative, to the extent approved by the Court. The amount that will be available for distribution to Class Members (known as the "Net Settlement Amount") will be the Settlement Amount *minus* the amounts used for other Settlement purposes (Case Contribution Fee, Court-approved Attorneys' Fees and Expenses to Class Counsel, Administration Expenses, and certain taxes and tax-related costs).

8. How may I benefit from the Settlement?

You may benefit by receiving payment of a portion of the Net Settlement Amount. The amount paid to each current Participant and Authorized Former Participant will be determined by a Plan of Allocation. As explained below, if you are a current Participant, or Beneficiary or Alternate Payee of a Participant and you have an active account in the Exela Plan, you do not need to take any action in order to receive payment under the Settlement. If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, you will need to submit a Former Participant Claim Form by the deadline for submission in order to receive payment under the Settlement. Payments made to current Participants, or to Beneficiaries or Alternate Payees of a current Participant who have active accounts in the Exela Plan under the Settlement shall be made into these persons' individual investment accounts in the Plan. Payments made to Authorized Former Participants, or to Beneficiaries or Alternate Payees of Former Participants who do not have active accounts in the Plan under the Settlement may be made either by check or tax-qualified rollover to an individual retirement account or other eligible employer plan.

9. How do I submit a claim for a Settlement Payment?

If you are a current Participant, or a Beneficiary or Alternate Payee of a current Participant and you have an active account in the Exela Plan, you do not need to submit a claim to be eligible for a payment under the Settlement. Your payment amount will automatically be calculated by the Settlement Administrator. If you are a Former Participant, or a Beneficiary or an Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, you must submit a Former Participant Claim Form by the deadline for submission in order to be eligible for a payment under the Settlement. "Former Participant" means a person who had an account in the Novitex Plan during the Class Period and who did not have account in the Exela Plan with a balance greater than \$0 as of April 26, 2021.

If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, and want to receive any monetary benefits from the Settlement, you must submit the Former Participant Claim Form by no later than August 24, 2021. You must mail the Former Participant Claim Form to the address shown on the Form.

A Former Participant Claim Form will be deemed submitted when it is actually received by the Settlement Administrator at the address listed in the Form.

EVEN IF YOU DO NOT SUBMIT A FORMER PARTICIPANT CLAIM FORM, YOU WILL BE BOUND BY THE SETTLEMENT. (See answer to question 14 below.)

10. What is the Plaintiff receiving from the Settlement?

Class Counsel intends to ask the Court to award the Class Representative a Case Contribution Fee of \$15,000 in recognition of the work and effort he expended on behalf of the Class.

THE SETTLEMENT BENEFITS – WHAT YOU GIVE UP

11. What do I give up by participating in the Settlement?

Each Member of the Class gives Defendants a "release." A release means you give up your rights to sue Defendants or receive any benefits from any other lawsuit against Defendants if the lawsuit asserts claims or relates in any way to the practices at issue in this lawsuit.

For additional details about the scope of the release, consult the Agreement or contact Class Counsel. (See answer to question 5 for details.)

THE LAWYERS REPRESENTING YOU

12. Do I have a lawyer in this case?

Yes. The Court has appointed the law firm of Miller Shah LLP as Class Counsel. You will not be charged for the work of these lawyers. If you want to be represented by a different lawyer in this case, you may hire one at your own expense.

13. How will the lawyers (Class Counsel) be paid?

Class Counsel will ask the Court for an award of attorneys' fees and expenses of up to 25% of the Settlement Amount based upon the value of the Settlement, the time they have devoted to this engagement, and the expenses they have advanced in prosecuting this matter.

OPTING OUT OF THE SETTLEMENT

14. Can I exclude myself from the Class?

No. The Class has been certified under Federal Rule of Civil Procedure 23(b)(1). Therefore, as a Class Member, you are bound by any judgments or orders that are entered in the lawsuit for all claims that were asserted in the lawsuit or are otherwise included as Released Claims as defined in the Agreement. If you wish to object to any part of the Settlement, you may (as discussed below) write to the Court and counsel about why you object to the Settlement.

OBJECTING TO THE SETTLEMENT

15. What does it mean to object?

Objecting is simply telling the Court that you do not like something about the Settlement. Objecting will not have any bearing on your right to receive the benefits of the Settlement if it is approved by the Court.

16. What is the procedure for objecting to the Settlement, including any objection to Class Counsel's Motion for Attorneys' Fees and Expenses or Case Contribution Award?

You can ask the Court to deny approval of the Settlement and/or the Motion for Attorneys' Fees and Expenses of Class Counsel or the Case Contribution Award to be requested for the Class Representative by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object. The Court, however, can award less than the amount requested by Class Counsel for attorneys' fees and expenses or the amount requested for the case contribution award and, if the Court does so, because of an objection or in its own discretion, although that ruling could affect the timing and amount of settlement payments, any such objection to or reduction in Class Counsel's attorneys' fees and expenses or case contribution fees to be paid to the Class Representative would not otherwise affect the finality of the Settlement.

Any objection to the proposed Settlement or Motion for Attorneys' Fees and Expenses or Case Contribution Award must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Fairness Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must (a) clearly identify the case name and number *Rigoberto Sandoval v. Exela Enterprise Solutions, Inc., et al.*, No. 3:17-cv-1573 (MPS) (D. Conn.), (b) be submitted to the Court either by mailing them to the Clerk of the Court for the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, United States Courthouse, 450 Main Street, Hartford, Connecticut 06103, or by filing them in person at any location of the United States District Court for the District of Connecticut, and (c) be filed or postmarked on or before August 15, 2021. Your objection must also include (1) your full name, current address, and current telephone number, and, if represented by counsel, any of your counsel's name and contact information; (2) whether the objection applies only to the objecting Class Member, to a specific subset of the Class, or to the entire Class; (3) a statement of the position(s) the objector wishes to assert; (4) copies of any other documents that the objector wishes to submit in support of his/her/its position; and (5) a list of any other objections to any class action settlements submitted in any court, whether state, federal, or otherwise, in the United States in the previous five (5) years.

ANY CLASS MEMBER WHO DOES NOT OBJECT IN THE MANNER DESCRIBED ABOVE SHALL BE DEEMED TO HAVE WAIVED ANY OBJECTION AND SHALL NOT HAVE ANY RIGHT TO OBJECT TO THE FAIRNESS OR ADEQUACY OF THE SETTLEMENT.

Clerk of the Court

U.S. District Court for the District
of Connecticut
Clerk of Court
Abraham Ribicoff Federal
Building
United States Courthouse
450 Main Street, Hartford,
Connecticut 06103

Class Counsel

James E. Miller
Miller Shah LLP
65 Main Street
Chester, CT 06412
Tel: (866) 540-5505

Defense Counsel

Meaghan VerGow
O'Melveny & Myers LLP
1625 Eye Street NW
Washington, D.C. 20017
Telephone: (202) 383-5300

THE COURT'S FAIRNESS HEARING

17. When/where will the Court decide whether to approve the Settlement?

On September 14, 2021 at 10:00 a.m., in the United States District Court for the District of Connecticut, Abraham Ribicoff Federal Building, United States Courthouse, 450 Main Street, Hartford, Connecticut 06103, the Court will hold a Fairness Hearing to determine whether the proposed Settlement is fair, reasonable, and adequate and whether it should be approved. The hearing may be continued from time to time by the Court without further notice, and may be held via teleconference or videoconference. Please check the website or contact Class Counsel if you wish to confirm that the hearing time has not been changed and to determine if it is occurring in person or by video or teleconference.

18. Do I have to attend the Fairness Hearing?

No; however, you are welcome to attend at your own expense. If you file an objection to the Settlement, you do not have to go to Court to talk about it. As long as your objection is filed by August 15, 2021 and you comply with the requirements in answer to question 16 above, the Court will consider it. You also may send your own lawyer to attend the Fairness Hearing.

19. May I speak at the Fairness Hearing?

You may ask the Court for permission to speak at the hearing. Anyone wishing to appear must state in their written objection their intention to appear at the Fairness Hearing, at your own expense.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

YOU AND ALL OTHER CLASS MEMBERS WILL BE BOUND BY THE JUDGMENT AND SETTLEMENT AGREEMENT, INCLUDING THE RELEASE OF CLAIMS, IF YOU DO NOTHING. If you are a current Participant, or a Beneficiary or Alternate Payee of a Participant and you have an active account in the Exela Plan, you do not need to take any action to be eligible to receive the Settlement benefits. If you are a Former Participant, or a Beneficiary or Alternate Payee of a Former Participant and you do not have an active account in the Exela Plan, you must submit a Former Participant Claim Form by the submission deadline or you will not receive any of the settlement payments described above in answer to questions 7 and 8.

DATED: June 25, 2021

**THIS NOTICE HAS BEEN SENT TO YOU BY ORDER
OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

Former Participant Claim Form

If you are a Former Participant in a defined contribution 401(k) retirement plan known as the Novitex Enterprise Solutions Retirement Savings Plan (the “Novitex Plan”) on or after January 1, 2014 through and including December 31, 2018 (the “Class Period”) but you do not have an active account with the Exela 401(k) Plan (the “Exela Plan”), or a Beneficiary or Alternate Payee (in the case of a person subject to a Qualified Domestic Relations Order (“QDRO”)) of a Former Participant (all of whom will be treated as Former Participants), and would like to receive a payment from the *Sandoval v. Exela., et al.* Settlement, you must complete the form below and mail it to Sandoval 401k Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson Street, Suite 205, Media, PA 19063 to be received **NO LATER THAN August 24, 2021**. “Former Participant” means a person who had an active account with a positive balance in the Novitex Plan during the Class Period but who does not have an account with the Exela Plan with a balance greater than \$0 as of April 26, 2021. “Beneficiary” or “Alternate Payee” means, for the purposes of this Former Participant Claim Form, a Beneficiary or Alternate Payee of a participant in the Novitex Plan (who maintained a positive account balance in the Novitex Plan during the Class Period), but does not have an active account in the Exela Plan.

Participant Information

Name		
Address		
Address 2		
City	State	Zip
Participant’s Social Security Number	Phone (Preferred)	Phone (Alternate)
Participant’s Date of Birth		
Email Address		

Beneficiary or Alternate Payee Information (ONLY PROVIDE IF THIS PERSON SHOULD RECEIVE PAYMENT INSTEAD OF THE PARTICIPANT)

Your Name		
Address		
Address 2		
City	State	Zip
Your Social Security Number	Phone (Preferred)	Phone (Alternate)
Your Date of Birth		
Email Address		

(Continued on page 2)

Payment Election (choose only one)

I WANT A CHECK MADE PAYABLE TO ME AND MAILED TO ME. Choosing this option entails the Settlement Administrator withholding 20% or more of your total payment for tax withholdings. The Settlement Administrator will mail your check to the Name and Address listed above.

OR

I WANT A CHECK MADE PAYABLE TO MY RETIREMENT ACCOUNT AS A ROLLOVER DISTRIBUTION. PLEASE MAKE THE CHECK PAYABLE TO:

Account Name	
Account Number	
Contact or Trustee (if required)	
Address Line 1	
Address Line 2	
City, State, Zip	

NOTE: There is no promise or assurance that these funds are eligible for rollover or tax- preferred treatment. The decision to seek rollover treatment is yours alone. Any questions about taxation or rollover treatment must be directed to your tax advisor or accountant. No one associated with this case can provide you with assistance or advice of any kind in this regard or answer any tax questions.

Required Certification Regarding Qualified Domestic Relations Order (“ODRO”): I hereby certify and represent under penalty of perjury that no portion of the payment to be received hereunder is subject to a QDRO, or, that a true and accurate and current copy of any applicable QDRO is attached hereto along with name and address of any payee other than Class Member. Payment will be made in accordance with any QDRO supplied.

Signature (Required): _____ **Date:** _____

Deceased Class Members

Deceased Class Members are not eligible for rollover treatment. A Beneficiary of a deceased person who was a participant in the Plan at any time during the Class Period, including executors, heirs, assigns, estates, personal representatives or successors-in-interest, must provide the following information with this Claim Form to Sandoval 401k Settlement Administrator, c/o Strategic Claims Services, 600 N Jackson Street, Suite 205, Media PA 19063:

- Evidence that such person is authorized to receive distribution of the deceased Class Member’s settlement payment and the name and, if applicable, the percentage entitlement of each person entitled to receive distribution;
- Social Security Number of each person entitled to receive payment;
- Current mailing address of each person entitled to receive payment; and
- Person(s) to whom check(s) should be made payable, and amount(s) of check(s).

Sandoval 401k Settlement Administrator
c/o Strategic Claims Services
600 N. Jackson St., Ste. 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

Mail id
Name
Address
City, State, ZIP

EXHIBIT C



Cornelia Vieira <cvieira@strategicclaims.net>

Fwd: PR Newswire: Press Release Distribution Confirmation for Miller Shah LLP. ID#3200158-1-1

1 message

Josephine Bravata <jbravata@strategicclaims.net>
To: Cornelia Vieira <cvieira@strategicclaims.net>

Sun, Jun 27, 2021 at 9:45 PM

Sent from my iPhone

Begin forwarded message:

From: phubs@prnewswire.com
Date: June 25, 2021 at 9:00:07 AM EDT
To: jbravata@strategicclaims.net
Subject: PR Newswire: Press Release Distribution Confirmation for Miller Shah LLP. ID#3200158-1-1

Hello

Your press release was successfully distributed at: 25-Jun-2021 09:00:00 AM ET

Release headline: Miller Shah LLP Announces Proposed Class Action Settlement on Behalf of Former Participants in the Novitex Enterprise Solutions Retirement Savings Plan
Word Count: 1454
Product Selections:
US1
Visibility Reports Email
Complimentary Press Release Optimization
PR Newswire ID: 3200158-1-1

View your release:* http://www.prnewswire.com/news-releases/miller-shah-llp-announces-proposed-class-action-settlement-on-behalf-of-former-participants-in-the-novitex-enterprise-solutions-retirement-savings-plan-301315089.html?tc=eml_cleartime

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* If the page link does not load immediately, please refresh and try again after a few minute s.

EXHIBIT D



Phone 866.274.4004
610.565.9202
Fax 610.565.7985
strategicclaims.net

May 3, 2021

VIA CERTIFIED MAIL

The Honorable Merrick Garland
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

RE: Notice of Proposed Class Action Settlement Pursuant to 28 U.S.C. § 1715

Dear Sir or Madam:

Strategic Claims Services has been retained in the proposed class action lawsuit entitled *Rigoberto Sandoval v. Exela Enterprise Solutions, Inc., et al.*, Case No. 3:17-cv-1573 (MPS) (D. Conn.) to provide notices required under the Class Action Fairness Act. The Action is pending before the Honorable Michael P. Shea in the United States District Court, District of Connecticut.

In compliance with Section 1715 of the Class Action Fairness Act, 28 U.S.C. §§ 1332(d), 1453, and 1711–1715 (CAFA), this letter is to advise you that a Motion for entry of an order for Preliminary Approval was filed. The Court has approved the motion and set a hearing date of September 14, 2021.

The Defendants deny any and all wrongdoing, deny any liability to Lead Plaintiff or the proposed settlement class, and deny that Lead Plaintiff and the proposed class members have suffered any damages attributable to the Defendants' actions. In compliance with Section 1715(b), the following documents referenced below are included on the CD that is enclosed with this letter:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** A copy of the original Complaints filed in the actions as well as the various amended complaints are provided on the enclosed CD ROM.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** As of the date of this letter, the Court has set a date of September 14, 2021 at 10:00 a.m. for the Final Approval hearing.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** A copy of the *Notice* is enclosed on the CD ROM entitled "*Ex. B-1 – Long Notice*" as well as the "*Ex. B-2 – Summary Notice*".
4. **28 U.S.C. § 1715(b)(4) – Proposed Class Action Settlement:** A copy of the parties' *Settlement Agreement and Release* with Exhibits is provided on the enclosed CD ROM.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** As of the date of this letter, no other settlement or agreement has been entered into by the parties to this action.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** As of the date of this letter, no Final Judgment has been issued by the Court.
7. **28 U.S.C. § 1715(b)(7)(A)-(B) – Names of Class Members/Estimated Proportionate Share:** Pursuant to 28 U.S.C. § 1715(b)(7)(A), CAFA also requires a defendant, "if feasible," to provide the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement or (B) if the provision of information under subparagraph (A) is not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement. Defendants have provided Strategic Claims Services with the counts

of the class members residing in each state and enclosed on CD ROM is a table "Estimated Share by State," that contains each state's estimated proportionate share of class members.

If for any reason, you believe the enclosed information does not fully comply with Section 1715, please contact the Counsel for Defendants identified below, to address any concerns or questions that you may have.

Counsel for Defendants
O'MELVENY & MYERS LLP
Meaghan VerGow
1625 Eye Street NW
Washington, D.C. 20017

Sincerely,

Strategic Claims Services

By: Matthew Shillady
Title: Director of Operations

Enclosure – CD ROM