

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RON MILLER, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF:
(A) PLAINTIFFS' MOTION FOR FINAL APPROVAL OF SETTLEMENT AND PLAN
OF ALLOCATION; AND (B) LEAD COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

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Lead Plaintiffs Giuseppe Veleno and Gary Williams, and Named Plaintiff Ron Miller (collectively, “Plaintiffs”), on behalf of themselves and the Settlement Class, and Glancy, Prongay & Murray LLP and The Rosen Law Firm, P.A. (collectively, “Lead Counsel”), respectfully submit this reply memorandum of law in further support of (i) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation (ECF No. 134); and (ii) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (ECF No. 136) (collectively, the “Motions”).¹

I. PRELIMINARY STATEMENT

Pursuant to the Court’s October 19, 2023, Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 133, the “Preliminary Approval Order”), approximately 18,964 copies of the Court-approved Postcard Notice or Notice and Claim Form were disseminated to potential Settlement Class Members and the largest brokerage firms, banks, institutions, and other nominees.² In addition, the Court-appointed Claims Administrator, Strategic Claims Services, Inc. (“SCS”): (i) caused the Summary Notice to be published in *Investor’s Business Daily* and transmitted over *PR Newswire* on November 27, 2023,³ and (ii) caused the Postcard Notice, Notice, Claim Form, Stipulation, and Preliminary Approval Order, among other important case-related documents, to be posted on the Settlement Website (www.strategicclaims.net/sonus/). *See* Initial Mailing Decl., ¶13.

¹ Unless otherwise noted, capitalized terms have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated July 21, 2023 (ECF No. 122-1) (“Stipulation”) or in the Joint Declaration of Garth A. Spencer and Jacob A. Goldberg in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (ECF No. 138) (“Joint Declaration”).

² *See* Supplemental Declaration of Margery Craig Concerning: (A) Mailing/Emailing of Notice; (B) Report on Requests for Exclusion and Objections; and (C) Claims Received to Date (the “Suppl. Mailing Decl.”) (attached as Exhibit 1 hereto), at ¶¶3-4.

³ ECF No. 138-1 (Declaration of Margery Craig Concerning: (A) Mailing of the Postcard Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections (“Initial Mailing Decl.”)), at ¶11.

The Postcard Notice, Notice, Summary Notice and Settlement Website informed Settlement Class Members of the April 3, 2024 deadline to: (i) submit an objection to the Settlement, Plan of Allocation, or request for attorneys' fees and reimbursement of Litigation Expenses, or (ii) request exclusion from the Settlement Class. *See id.*, ¶¶14-15.

On March 20, 2024, fourteen (14) days prior to the objection deadline, Plaintiffs and Lead Counsel filed their opening papers in support of the Settlement, Plan of Allocation, and request for attorneys' fees and reimbursement of Litigation Expenses. The Motions are supported by the declarations of Plaintiffs, Plaintiffs' Counsel, and the Claims Administrator. These papers are available on the public docket and on the Settlement Website. *See* ECF Nos. 134-138; Supp. Mailing Decl., at ¶6.

Following this extensive notice process, *no* Settlement Class Member has objected to the Settlement, the Plan of Allocation, or Lead Counsel's application for attorneys' fees and reimbursement of Litigation Expenses. Moreover, SCS has not received a single request for exclusion. *See id.*, at ¶7. The absence of any objections or opt-outs by Settlement Class Members provides strong evidence of the fairness and reasonableness of the proposed Settlement, Plan of Allocation, and request for attorneys' fees and reimbursement of Litigation Expenses. *See Ressler v. Jacobson*, 149 F.R.D. 651, 656 (M.D. Fla. Dec. 15, 1992) ("The fact that there are no objections to either the Settlement or to Petitioners' request for attorney's fees is strong evidence of the propriety and acceptability of that request."); *see also In re StockerYale, Inc. Sec. Litig.*, 2007 WL 4589772, at *7 (D.N.H. Dec. 18, 2007) (approving class settlement, 33.3% fee award and reimbursement of litigation expenses where "no objection was filed against either the terms of the proposed Settlement or the ceiling on fees and expenses to be requested by Lead Plaintiffs' Counsel.").

Finally, at the Preliminary Approval Hearing, the Court set the Settlement Hearing after the claims filing deadline so that Lead Counsel could provide the Court with information on the number

of claims filed in connection with the Settlement. The deadline for claims submission was March 15, 2024. As of April 10, 2024, SCS has received 3,769 claims. *See* Suppl. Mailing Decl., at ¶9. SCS is currently conducting quality assurance reviews of the submitted claims, such as verifying that the claim includes the required supporting documentation and detecting duplicative claims. Once this audit process is complete, claimants with incomplete or invalid claims will be given an opportunity to supplement or complete their claims. With these steps currently outstanding, the number of claims considered valid has not yet been determined. *See id.*

Assuming the Court approves the Settlement, and the Effective Date occurs, the number of valid (and invalid) claims will be presented to the Court in conjunction with Lead Counsel’s Motion for Class Distribution Order. *See* Stipulation, at ¶26. It is, however, important to note that, given this is not a claims-made settlement (*see id.*, at ¶13), the entire Net Settlement Fund will be distributed to Authorized Claimants regardless of the number of valid claims if the Settlement is approved by the Court and becomes effective. *See id.*, at ¶¶1(c), 9, 26, 32.

II. ARGUMENT

A. The Positive Reaction Of The Settlement Class Supports Approval Of The Settlement And Plan Of Allocation

Plaintiffs and Lead Counsel respectfully submit that the complete lack of objections and opt-outs support a finding that the Settlement is fair, reasonable, and adequate. *See, e.g., Bussie v. Allmerica Fin. Corp.*, 50 F. Supp. 2d 59, 77 (D. Mass. 1999) (the “favorable reaction of class to settlement, albeit not dispositive, constitutes strong evidence of fairness of proposed settlement and supports judicial approval”) (citation omitted); *Roberts v. TJX Cos., Inc.*, No. 13-cv-13142-ADB, 2016 WL 8677312, at *6 (D. Mass. Sept. 30, 2016) (finding that lack of objections and small number of opt-outs “supports judicial approval of the Settlement”); *Trombley v. Bank of Am. Corp.*, No. 08-cv-456-JD, 2013 WL 5153503, at *6 (D.R.I. Sept. 12, 2013) (“The lack of objection and the small

number of potential class members who opted out of the class weigh in favor of approving the settlement.”).⁴

The fact that no institutional investors have objected or requested exclusion from the Settlement Class further underscores the reasonableness of the Settlement.⁵ *See, e.g., Hill v. State St. Corp.*, 2015 WL 127728, at *8 (D. Mass. Jan. 8, 2015) (O’Toole, J.) (“The fact that no institutional investors have objected or requested exclusion also supports approval of the Settlement.”); *In re Tyco Int’l, Ltd. Multidistrict Litig.*, 535 F. Supp. 2d 249, 261 (D.N.H. 2007) (finding that “[t]he reaction of the class to the settlement has been almost entirely positive,” where “[n]one of the institutional investors have objected to the size of the settlement”); *In re AT&T Corp. Sec. Litig.*, MDL No. 1399, 2005 WL 6716404, at *4 (D.N.J. Apr. 25, 2005) (approving settlement where “no objections were filed by any institutional investors who had great financial incentive to object”).

The lack of objections from Settlement Class Members also supports approval of the Plan of Allocation. *See, e.g., Machado v. Endurance Int’l Grp. Holdings, Inc.*, No. 1:15-cv-11775-GAO, ECF No. 96, ¶¶4, 6 (D. Mass. Sept. 13, 2019) (approving plan of allocation where “[t]he Notice, which included the Plan of Allocation, was available to potential Settlement Class Members and nominees on the Settlement Website and no objections to the proposed plan were submitted.”); *Medoff*, 2016 WL 632238, at *7 (“In the absence of any objection to [the plan of allocation], the

⁴ *See also Medoff v. CVS Caremark Corp.*, 2016 WL 632238, at *6 (D.R.I. Feb. 17, 2016) (“the lack of any serious objection to the settlement agreement from members of the class weighs in favor of approving the settlement.”); *In re Puerto Rican Cabotage Antitrust Litig.*, 815 F. Supp. 2d 448, 473 (D.P.R. 2011) (finding that receipt of just three objections, none of which challenged the adequacy of the settlement amount, following mailing of over 61,000 notices, “certainly weighs in favor of approval” of the settlement); *In re Compact Disc Minimum Advertised Price Antitrust Litig.*, 216 F.R.D. 197, 211 (D. Me. 2003) (reaction of class supported approval of settlement where “the number of objections and opt-outs [was] miniscule” in relation to “the size of the class”).

⁵ Institutional investors held approximately 75% of the Sonus common stock outstanding during the Settlement Class Period.

court concludes that this approach is grounded in a reasonable and rational basis, and is fair to the members of the class.”); *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.*, 986 F. Supp. 2d 207, 240 (E.D.N.Y. 2013) (conclusion that the proposed plan of allocation was fair and reasonable was “buttressed by the . . . absence of objections from class members”).⁶

B. The Settlement Class’s Reaction Supports Approval Of The Fee And Expense Application

Finally, the absence of *any* objections to Lead Counsel’s application for an award of attorneys’ fees and reimbursement of Litigation Expenses, including an award of \$10,000 to each of the Plaintiffs to reimburse them for time spent prosecuting the Action, supports a finding that the request is fair and reasonable. *See, e.g., Machado v. Endurance Int’l Grp. Holdings, Inc.*, 2019 WL 4409217, at *1 (D. Mass. Sept. 13, 2019) (O’Toole, J.) (awarding 33⅓ of \$18,650,000 settlement fund, reimbursement of litigation expenses and PSLRA awards to lead plaintiffs where “[t]here were no objections to the requested attorneys’ fees and expenses.”); *In re Relafen Antitrust Litig.*, 231 F.R.D. 52, 59, 72-73 (D. Mass. 2005) (awarding 33⅓ of \$67,000,000 settlement fund, reimbursement of litigation expenses and incentive awards to plaintiffs where “[t]he overall reaction to the settlement has been positive.”); *In re StockerYale, Inc. Sec. Litig.*, 2007 WL 4589772, at *7 (D.N.H. Dec. 18, 2007) (awarding 33.3% of settlement fund, plus litigation expenses, where there were no objections); *Natchitoché Par. Hospital Serv. Dist. v. Tyco Int’l, Ltd.*, 2010 WL 11693979, at *4 (D. Mass. March 12, 2010) (awarding one-third of \$32.5 million settlement fund, plus expenses, where there were no objections).⁷

⁶ *See also In re Veeco Instruments Inc. Sec. Litig.*, 2007 WL 4115809, at *14 (S.D.N.Y. Nov. 7, 2007) (“not one class member has objected to the Plan of Allocation which was fully explained in the Notice of Settlement sent to all Class Members. This favorable reaction of the Class supports approval of the Plan of Allocation.”).

⁷ *See also In re Asacol Antitrust Litig.*, 2017 WL 11475275, at *4-5 (D. Mass. Dec. 7, 2017) (awarding 33⅓ of \$15 million settlement fund, litigation expenses and service awards where “[t]here hav[e] been no objections to either the Settlement or the motion for an award of attorneys’ fees,

* * *

In sum, the complete absence of objections—together with the almost unheard of complete absence of requests for exclusion—from *any* members of the Settlement Class strongly militates in favor of a finding that the Settlement is fair, reasonable, and adequate, that the proposed Plan of Allocation is fair and equitable, and that Lead Counsel’s fee and expense application is fair and reasonable.

III. CONCLUSION

For the foregoing reasons, and for the additional reasons previously set forth in the opening papers, Plaintiffs and Lead Counsel respectfully request that the Court approve the proposed Settlement, the proposed Plan of Allocation, and the request for attorneys’ fees and reimbursement of Litigation Expenses. Copies of the (i) proposed Judgment Approving Class Action Settlement; (ii) proposed Order Approving Plan of Allocation of Net Settlement Fund; and (iii) proposed Order Awarding Attorneys’ Fees and Reimbursement of Litigation Expenses (including awards to Plaintiffs pursuant to 15 U.S.C. § 78u-4(a)(4)) are attached hereto as Exhibits 2, 3, and 4, respectively.

reimbursement of expenses, and service awards to the Class Representatives[.]); *Gordan v. Massachusetts Mutual Life Insurance Co.*, 2016 WL 11272044, at *1 (D. Mass. Nov. 3, 2016) (awarding one-third of \$30.9 million settlement fund and case contribution awards where “[t]he record is clear that the Class Members overwhelmingly support this settlement and the work performed by Class Counsel.”); *Gonzalez v. TCR Sports Broadcasting Holding, LLP*, 2019 WL 2249941, at *1, *6 and *9 (S.D. Fla. May 24, 2019) (awarding one-third of \$2.5 million settlement fund, reimbursement of expenses, and lead plaintiff PSLRA awards, and noting that “no objections have been filed and that none were presented at the final fairness hearing”); *In re NetBank, Inc. Sec. Litig.*, 2011 WL 13353222, at *2 (N.D. Ga. Nov. 9, 2011) (awarding 34% of the \$12.5 million gross settlement fund, plus expenses, and stating: “[i]n addition, the absence of any objection by Class Members to the requested attorneys’ fees and reimbursement of costs and expenses is significant, and supports the reasonableness of the requested fee”).

Dated: April 17, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Garth Spencer _____
Garth Spencer

EXHIBIT 1

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**SUPPLEMENTAL DECLARATION OF MARGERY CRAIG CONCERNING:
(A) MAILING/EMAILING OF NOTICE; (B) REPORT ON REQUESTS FOR
EXCLUSION AND OBJECTIONS; AND (C) CLAIMS RECEIVED TO DATE**

I, Margery Craig, declare as follows:

1. I am a Project Manager of Strategic Claims Services, Inc. (“SCS”), a nationally recognized class action administration firm.¹ I have over sixteen years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and fifty (550) class action cases since its inception. I have personal knowledge of the facts set forth herein and, if called on to do so, I could and would testify competently thereto.

UPDATE ON MAILING/EMAILING OF NOTICE

2. Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice, dated October 19, 2023 (ECF No. 133, the “Preliminary Approval Order”), SCS was retained by Lead Counsel to serve as the Claims Administrator in the above-captioned action (the “Action”). I submit this declaration as a supplement to my earlier declaration, the Declaration of

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated July 21, 2023 (ECF No. 122-1) (the “Stipulation”).

Margery Craig Concerning: (A) Mailing of the Postcard Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections, dated March 18, 2024 (ECF No. 138-1, the “Initial Mailing Declaration”).

3. As reported in the Initial Mailing Declaration, as of March 18, 2024, a total of 11,052 Postcard Notices had been mailed to potential Settlement Class Members either by SCS or nominees. Additionally, as noted in the Initial Mailing Declaration, 7,912 emails containing a link to the Notice and Claim Form had been sent to potential Settlement Class Members by a nominee. Since the execution of the Initial Mailing Declaration, no additional Postcard Notices have been mailed and no additional emails containing a link to the Notice and Claim Form were sent.

4. In total as of the date of this Declaration, a 18,964 potential Settlement Class Members have been mailed the Postcard Notice or an emailed the link to the Notice and Claim Form² on the Settlement Website.

UPDATE ON TOLL-FREE PHONE LINE

5. As stated in the Initial Mailing Declaration, SCS maintains a toll-free telephone number (1-866-274-4004) for potential Settlement Class Members to call and obtain information about the Settlement. Settlement Class Members may also request a Notice and Claim Form be mailed or emailed to them. SCS continues to promptly respond to each telephone inquiry and address Settlement Class Members’ inquiries through the claims process.

² The Initial Mailing Declaration stated that SCS received 22 requests from potential Settlement Class Members for the Notice and Claim Form to be mailed to them, SCS immediately mailed them a Notice and Claim Form. Since the Initial Mailing Declaration was filed, SCS has not received any additional request from potential Settlement Class Members for a Notice and Claim Form to be mailed.

UPDATE ON SETTLEMENT WEBSITE

6. On November 8, 2023, SCS established the case-specific Settlement Website. The Settlement Website is accessible 24 hours a day, 7 days a week. The Settlement Website contains information related to the current status of the Action; case deadlines; the online claim filing link; and important documents. On March 21, 2024, SCS posted to the Settlement Website: (a) Notice of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation; (b) Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation; (c) Lead Counsel's Notice of Motion and Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; (d) Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; and (e) Joint Declaration of Garth A. Spencer and Jacob A. Goldberg in Support of (I) Plaintiffs' Motion for Final Approval of Class Action Settlement, Class Certification, and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Award to Plaintiffs. To date, the Settlement Website has received 4,553 pageviews from 917 unique users.

UPDATE ON REPORT ON EXCLUSIONS AND OBJECTIONS

7. The Postcard Notice, Notice, Summary Notice, and the Settlement Website informed potential Settlement Class Members that written request for exclusion were to be mailed to SCS such that they were received no later than April 3, 2024. SCS has been monitoring all mail delivered for this case. As of the date of this declaration, SCS has received no exclusion requests.

8. The Postcard Notice, Notice, Summary Notice, and the Settlement Website, further informed Settlement Class Members seeking to object to the Settlement, the proposed Plan of Allocation or Lead Counsel's motion for an award of attorneys' fees and reimbursement of

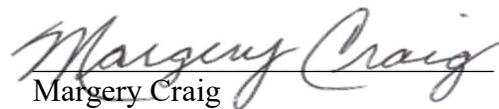
Litigation Expenses, that objections must be submitted in writing to the Clerk of the Court, Lead Counsel, and Defendants' Counsel such that they were received on or before April 3, 2024. As of the date of this declaration, SCS has not been notified of any objections or received any misdirected objections.

CLAIMS RECEIVED TO DATE

9. The deadline for claims submission was March 15, 2024. As of the date of this declaration, SCS has received 3,769 claims. SCS is currently conducting quality assurance reviews of the submitted claims, such as verifying that the claim includes the required supporting documentation and detecting duplicative claims. Once this audit process is complete, claimants with incomplete or invalid claims will be given an opportunity to supplement or complete their claims. With these steps currently outstanding, the number of claims considered valid has not yet been determined.

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

Signed this 10th day of April 2024, in Media, Pennsylvania.


Margery Craig