#### IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

HOLLYWOOD FIREFIGHTERS' PENSION FUND, WEST PALM BEACH FIREFIGHTERS' PENSION FUND, and SHEET METAL WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND, on behalf of themselves and all others similarly situated.

Plaintiffs,

v.

JOHN C. MALONE, GREGORY B. MAFFEI, GREGG L. ENGLES, RONALD A. DUNCAN, DONNE F. FISHER, and RICHARD R. GREEN,

Defendants.

C.A. No. 2020-0880-SG

# PLAINTIFFS' MOTION FOR CLASS DISTRIBUTION ORDER

PLEASE TAKE NOTICE THAT Plaintiffs Hollywood Firefighters' Pension Fund and Sheet Metal Workers' Local Union No. 80 Pension Trust Fund respectfully move this Court to enter the accompanying Class Distribution Order pursuant to the terms of the Stipulation and Agreement of Settlement, Compromise, and Release (the "Stipulation") (Trans. ID 66691073) and the Court's Order and Final Judgment (Trans. ID 66998454) and submit in support of this motion the accompanying Affidavit of Adam D. Walter in Support of Plaintiffs' Motion for Class Distribution

Order (the "Walter Affidavit") submitted by the Court-approved Settlement Administrator, A.B. Data, Ltd. ("A.B. Data"). 1,2 If approved by the Court, the Class Distribution Order will, *inter alia*:

- 1. Direct A.B. Data to distribute 100% of the available balance of the Net Settlement Fund, after deducting all payments previously allowed and the payment of A.B. Data's fees and expenses requested in this Motion, and after deducting payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, as set forth in paragraph 12 of the Walter Affidavit (the "Distribution").
- 2. Consistent with ¶ 44 of the Court-approved Plan of Allocation stated in the Notice disseminated to Class Members, direct that each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund in connection with the Distribution equal to the product of (a) the number of Eligible Shares held by the Eligible Class Member and (b) the "Per-Share Recovery" for the Settlement, which will be determined by dividing the total available amount of the Net

Pursuant to the Court's Scheduling Order (Trans. ID 66727652), the Court authorized A.B. Data to act as the Settlement Administrator in connection with the Settlement of this Action.

Plaintiffs incorporate by reference the definitions in the Stipulation and the Walter Affidavit, and all terms used herein shall have the same meanings as set forth in the Stipulation and/or the Walter Affidavit.

Settlement Fund by the total number of Eligible Shares (the "Per-Share Recovery"). (Walter Affidavit ¶ 12(a)).

- Consistent with ¶ 46(i) of the Plan of Allocation, with respect to GCI 3. Liberty Series A common stock held of record at the Closing by the Depository Trust & Clearing Corporation, including its subsidiary the Depository Trust Company (collectively, "DTCC"), through its nominee Cede & Co., Inc. ("CEDE"), direct A.B. Data to cause that portion of the Net Settlement Fund allocated to Eligible Class Members who held their shares through DTCC Participants to be paid to DTCC. DTCC shall then distribute that portion of the Net Settlement Fund among the DTCC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,<sup>3</sup> using the same mechanism that DTCC used to distribute the Merger Consideration and subject to payment suppression instructions with respect to Excluded Shares. (Walter Affidavit ¶ 12(b)). The DTCC Participants and their respective customers, including any intermediaries, shall then ensure pro rata payment to each Eligible Class Member based on the number of Eligible Shares beneficially owned by such Eligible Class Members. (*Id.*)
- 4. Consistent with ¶ 46(ii) of the Plan of Allocation, with respect to GCI Liberty Series A common stock held of record as of the Closing other than by Cede,

For each DTCC Participant, the "Closing Security Position" is the number of shares of GCI Liberty Series A common stock reflected on the DTCC allocation report used by DTCC to distribute the Merger Consideration.

as nominee for DTCC (a "Closing Non-Cede Record Position"), direct A.B. Data to make payment from the Net Settlement Fund directly to the record owner of each such Closing Non-Cede Record Position ("Closing Non-Cede Record Holders") in an amount equal to the Per-Share Recovery times the number of shares of GCI Liberty Series A common stock comprising such Closing Non-Cede Record Position (Walter Affidavit ¶ 12(c)); *provided, however*, that all Closing Non-Cede Record Holders whose payment amount calculates to less than \$1.00 will be excluded from the distribution, with the funds allocated to such stockholders reallocated and paid on a *pro rata* basis to those Closing Non-Cede Record Holders whose calculated share of the Net Settlement Fund is \$1.00 or greater. (*Id.*).

5. Direct that, to the extent that any record owner, any DTCC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of GCI Liberty Series A common stock entitled to payment of the Merger Consideration, whether through permitting naked short-selling or the cash settlement of short positions or through any other means ("Increased Merger Consideration Entitlements"), such record owner, DTCC Participants, or their respective customer (including intermediaries) shall be responsible for paying to the ultimate beneficial owners of such Increased Merger Consideration Entitlements an amount equal to the Per-Share Recovery times the number of the Increased Merger Consideration Entitlements. Whether

DTCC, any DTCC Participant, or DTCC Participants' customers are entitled to receive such funds from any such short-seller is not before this Court. (Walter Affidavit ¶ 12(d)).

- 6. Consistent with ¶ 46(iii) of the Plan of Allocation, direct that any person or entity who purchased shares of GCI Liberty Series A common stock on or before December 18, 2020, but had not settled those shares at the Merger's Closing ("Non-Settled Shares"), shall be treated as an Eligible Class Member with respect to those Non-Settled Shares, and any person or entity who sold those Non-Settled Shares on or before December 18, 2020, shall not be treated as an Eligible Class Member with respect to those Non-Settled Shares. (Walter Affidavit ¶ 12(e)).
- 7. Following the distribution of the Net Settlement Fund to DTCC Participants, direct that inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTCC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares. (Walter Affidavit ¶ 12(f)).
- 8. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, direct that all Distribution checks bear the following notation: "CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE]." (Walter Affidavit ¶ 12(g)).

- 9. Consistent with ¶ 46(iv) of the Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (i.e., more than six months from the check's issue date), direct that the DTCC Participants and the holder of a Closing Non-Cede Record Position shall follow their respective policies with respect to further attempted distribution or escheatment. (Walter Affidavit ¶ 12(h)).
- 10. Authorize the destruction of paper copies of all supporting documentation one year after the distribution of the Net Settlement Fund, and the destruction of electronic copies of the same one year after all funds in the Net Settlement Fund have been distributed. (Walter Affidavit ¶ 12(i)).
- 11. Direct that payment pursuant to the Class Distribution Order shall be final and conclusive against all Eligible Class Members, and release and discharge all persons involved in the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund, from any and all claims arising out of such involvement, and bar all Class Members, whether or not they receive payment from the Net Settlement Fund, from making any further claims against the Net Settlement Fund, Plaintiffs, Plaintiffs' Counsel, the Settlement Administrator (A.B. Data), or any other agent retained by Plaintiffs or Plaintiffs' Counsel in connection with the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund beyond the amounts allocated to Eligible Class Members.

12. Approve all of A.B. Data's fees and expenses incurred in connection with the administration of the Settlement and estimated to be incurred in connection with the distribution of the Net Settlement Fund as set forth in Exhibit A to the Walter Affidavit and authorize Plaintiffs' Counsel to direct payment out of the Settlement Fund to A.B. Data in payment of any such outstanding fees and expenses.

13. Retain jurisdiction to consider any further applications concerning the administration of the Settlement, and such other and further relief as the Court deems appropriate.

Dated: December 19, 2022

OF COUNSEL:

Mark Lebovitch

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

1251 Avenue of the Americas New York, NY 10020 (212) 554-1400

Plaintiffs' Lead Counsel

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

/s/ Gregory V. Varallo

Gregory V. Varallo (Bar No. 2242) Andrew E. Blumberg (Bar No. 6744) 500 Delaware Avenue, Suite 901 Wilmington, DE 19801 (302) 364-3601

Plaintiffs' Lead Counsel

**WORDS: 1,362** 

# **CERTIFICATE OF SERVICE**

I, Gregory V. Varallo, hereby certify that on December 19, 2022, the foregoing *Plaintiffs' Motion for Class Distribution Order* was filed and served via File & Serve*Xpress* upon the following counsel of record:

Robert S. Saunders, Esq. Joseph O. Larkin, Esq. Matthew P. Majarian, Esq. Ryan M. Lindsay, Esq. SKADDEN ARPS SLATE MEAGHER & FLOM LLP One Rodney Square Wilmington, DE 19899

Kenneth J. Nachbar, Esq. Megan W. Cascio, Esq. Thomas P. Will, Esq. Sarah P. Kaboly, Esq. MORRIS, NICHOLS, ARSHT & TUNNELL LLP 1201 North Market Street Wilmington, Delaware 19801 Douglas D. Herrmann, Esq. Emily L Wheatley, Esq. TROUTMAN PEPPER HAMILTON SANDERS, LLP Hercules Plaza, Suite 5100 1313 Market Street Wilmington, DE 19801

Corinne Elise Amato, Esq. Kevin H. Davenport, Esq. Mary S. Thomas, Esq. PRICKETT, JONES & ELLIOTT, P.A. 1310 King Street Wilmington, DE 19801

<u>/s/ Gregory V. Varallo</u> Gregory V. Varallo (Bar No. 2242)

#### IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

HOLLYWOOD FIREFIGHTERS' PENSION FUND, WEST PALM BEACH FIREFIGHTERS' PENSION FUND, and SHEET METAL WORKERS' LOCAL UNION NO. 80 PENSION TRUST FUND, on behalf of themselves and all others similarly situated.

C.A. No. 2020-0880-SG

Plaintiffs,

v.

JOHN C. MALONE, GREGORY B. MAFFEI, GREGG L. ENGLES, RONALD A. DUNCAN, DONNE F. FISHER, and RICHARD R. GREEN,

Defendants.

# [PROPOSED] CLASS DISTRIBUTION ORDER

The Court, having considered Plaintiffs' Motion for Class Distribution Order (the "Motion"), and for good cause shown, IT IS HEREBY ORDERED that:

- 1. The Motion is GRANTED.
- 2. The Settlement Administrator shall implement the proposed Plan of Distribution as described in the Motion.

IT IS SO ORDERED this d	ay of	202
	Vice Chancellor Sam Glassc	ock III

#### IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

HOLLYWOOD FIREFIGHTERS'
PENSION FUND, WEST PALM
BEACH FIREFIGHTERS' PENSION
FUND, and SHEET METAL
WORKERS' LOCAL UNION NO. 80
PENSION TRUST FUND, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

JOHN C. MALONE, GREGORY B. MAFFEI, GREGG L. ENGLES, RONALD A. DUNCAN, DONNE F. FISHER, and RICHARD R. GREEN,

Defendants.

C.A. No. 2020-0880-SG

# AFFIDAVIT OF ADAM D. WALTER IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS DISTRIBUTION ORDER

STATE OF FLORIDA	)
	) SS
COUNTY OF PALM BEACH	)

Adam D. Walter, being duly sworn, deposes and says:

1. I am a Senior Project Manager at A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"). My business address is 5080 PGA Boulevard, Suite 209, Palm Beach Gardens, Florida 33418, and my direct telephone number is (561) 336-1802. I am over 21 years of age and am not a party to the above-

captioned action (the "Action"). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

Pursuant to the Scheduling Order (Trans. ID 66727652) entered by the 2. Court in connection with the settlement of this Action (the "Settlement"), the Court authorized A.B. Data to act as the Settlement Administrator for the Settlement. As more fully described in the Unsworn Declaration of Steven J. Straub Regarding (A) Mailing of Notice; and (B) Publication of Summary Notice (Trans. ID 66969279), as the Settlement Administrator, A.B. Data has implemented the terms of the Settlement by, among other things: (i) mailing the Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear (the "Notice") to potential Class Members; (ii) causing the publication of the Summary Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear in *Investor's Business Daily* and over PR Newswire; (iii) creating and continuing to maintain a toll-free helpline and a Settlement website to assist Class Members during the course of the administration; and (iv) administering the Settlement in accordance with the terms of the Stipulation.

<sup>&</sup>lt;sup>1</sup> Unless otherwise defined in this affidavit (the "Affidavit"), all capitalized terms that are not defined in this Affidavit have the meaning ascribed to them in the Stipulation and Agreement of Settlement, Compromise, and Release entered into by and among the Settling Parties (the "Stipulation") (Trans. ID 66691073).

3. Pursuant to the Court's Order and Final Judgment (the "Final Approval Order") (Trans. ID 66998454), the Court granted final approval of the Settlement and the proposed plan of allocation of the Net Settlement Fund set forth in the Notice (the "Plan of Allocation"). I submit this Affidavit in support of Plaintiffs' motion for a Class Distribution Order, which will, among other things, approve the proposed plan for the distribution of the Net Settlement Fund to Eligible Class Members in accordance with the terms of the Settlement and the Court-approved Plan of Allocation.

# **MERGER RECORDS**

4. Pursuant to the terms of the Court-approved Plan of Allocation, the Net Settlement Fund will be distributed to all Eligible Class Members, i.e., all Class Members who held shares of GCI Liberty Inc. ("GCI" Liberty") Series A common stock at the Closing of the merger of GCI Liberty and a subsidiary of Liberty Broadband Corporation (the "Merger") and therefore were entitled to receive the Merger Consideration for their Eligible Shares. Eligible Shares are the number of shares of GCI Liberty Series A common stock held by Eligible Class Members at the Closing and for which Eligible Class Members received or were entitled to receive the Merger Consideration. In accordance with terms of the Stipulation, the Eligible Class Members do not include any of the Excluded Stockholders and the Eligible Shares do not include any of the Excluded Shares.

- 5. Under the terms of the Plan of the Allocation, Eligible Class Members were not required to file a claim form to receive distribution from the Settlement. Instead, distributions from the Net Settlement Fund will be paid to Eligible Class Members based upon the Merger Records provided to A.B. Data by Defendants.
- 6. A.B. Data received a copy of the Merger Records identifying all registered holders of GCI Liberty Series A common stock who held shares of GCI Liberty Series A common stock at the Closing, i.e., December 18, 2020 ("Merger Record Holders"). The Merger Records contain the names, addresses, and number of shares held by each of the Merger Record Holders. The Merger Records identified 1,483 Merger Record Holders holding 105,707,262 shares of GCI Liberty Series A common stock outstanding at the Closing. Accounting for the 7,282,740 Excluded Shares described in paragraph 8 below, A.B. Data identified 98,424,522 shares of GCI Liberty Series A common stock held by Eligible Class Members at the Closing (the "Eligible Shares").
- 7. A.B. Data also received a Security Position Report from Cede & Co. ("Cede"), as nominee for the Depository Trust & Clearing Company ("DTCC"), showing each DTCC Participant's holdings of GCI Liberty Series A common stock at the Closing. A.B. Data also consulted with DTCC to confirm the accuracy of the number of shares identified in the Merger Records. The DTCC Security Position Report contains each DTCC Participant's name, identification number, and the

number of shares held by the DTCC Participant. The Security Position Report identified 155 DTCC Participants holding a total of 98,362,850 Eligible Shares. 1,473 non-Cede individual record holders held the remaining 61,672 Eligible Shares of record.

8. Consistent with the terms of the Settlement, Defendants provided A.B. Data with information concerning the stockholdings of the identified Excluded Stockholders. Based on the information provided by Defendants, a total of 7,282,740 Excluded Shares have been identified as being held by Excluded Stockholders, which includes 244,856 shares that were identified as being held by GCI Liberty. A.B. Data has worked to successfully obtain suppression letters for Excluded Stockholders. A.B. Data has delivered the executed suppression letters to DTCC and will direct DTCC to suppress payment to each of the Excluded Stockholders on whose behalf the DTCC Participants held Excluded Shares.

# **SETTLEMENT ADMINISTRATION FEES AND DISBURSEMENTS**

9. A.B. Data agreed to be the Settlement Administrator in exchange for payment of its fees and expenses. Plaintiffs' Counsel received regular reports of all the work A.B. Data performed with respect to the administration of the Settlement and authorized the administration work performed herein. Attached hereto as Exhibit A are invoices of A.B. Data's total fees and expenses for this matter through November 30, 2022, which total \$222,582.58, and A.B. Data's estimate of fees and

expenses to conduct the initial distribution of the Net Settlement Fund in accordance with the "Distribution Plan" described below (\$45,333.30). To date, A.B. Data has received \$213,419.63 for its fees and expenses. Accordingly, there is an outstanding balance of \$54,496.25 payable to A.B. Data, which amount includes A.B. Data's anticipated fees and expenses for the initial distribution as well as the estimated fee to be paid to DTCC for their part of the distribution.

# **DE MINIMIS PAYMENT THRESHOLD**

- 10. The proposed distribution plan for the Net Settlement Fund set forth below provides for a \$1.00 *de minimis* payment threshold to be applied to all non-Cede Eligible Class Members listed in the Merger Records. A \$1.00 *de minimis* distribution threshold would require these Eligible Class Members to own at least two shares of GCI Liberty Series A common stock to be eligible to receive a distribution from the Net Settlement Fund. Based on an analysis of the stockholdings, this would impact Eligible Class Members collectively owning a total of just 95 Eligible Shares of the more than 98 million Eligible Shares, or less than 0.0001% of the total Eligible Shares.
- 11. In A.B. Data's experience, a minimum payment threshold is beneficial to the Class as a whole. The direct costs alone of printing and mailing distribution checks to record holders exceed the amount of those checks. In addition, Class Members are less likely to cash a check for less than \$1.00, which leads to additional

costs in the processing and handling of uncashed checks. For these reasons, A.B. Data recommends that a \$1.00 *de minimis* payment threshold be applied to all non-Cede Eligible Class Members listed in the Merger Records.

# DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND

- 12. A.B. Data will distribute 100% of the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payments approved by the Court on this motion, and after deducting payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees (the "Distribution"), as follows:
  - a. Consistent with ¶ 44 of the Court-approved Plan of Allocation, each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund in connection with the Distribution equal to the product of (a) the number of Eligible Shares held by the Eligible Class Member and (b) the "Per-Share Recovery" for the Settlement, which will be determined by dividing the total available amount of the Net Settlement Fund by the total number of Eligible Shares (the "Per-Share Recovery"). Based upon the total number of identified Eligible Shares and the estimated Net Settlement Fund available for distribution, the estimated Per-Share Recovery is \$0.89 per share.

- Consistent with  $\P$  46(i) of the Plan of Allocation, with respect to b. GCI Liberty Series A common stock held of record at the Closing by DTCC, through its nominee Cede, A.B. Data will cause that portion of the Net Settlement Fund to be allocated to Eligible Class Members who held their shares through DTCC Participants to be paid to DTCC. DTCC will then be directed to distribute that portion of the Net Settlement Fund among the DTCC Participants by paying each the Per-Share Recovery times its respective Closing Security Position, which is the number of shares of GCI Liberty Series A common stock reflected on the DTCC allocation report used by DTCC to distribute the Merger Consideration, using the same mechanism that DTCC used to distribute the Merger Consideration and subject to payment suppression instructions with respect to Excluded Shares. The DTCC Participants and their respective customers, including any intermediaries, will then ensure pro rata payment to each Eligible Class Member based on the number of Eligible Shares beneficially owned by such Eligible Class Members.
- c. Consistent with ¶ 46(ii) of the Plan of Allocation, with respect to GCI Liberty Series A common stock held of record as of the Closing other

<sup>&</sup>lt;sup>2</sup> For each DTCC Participant, the "Closing Security Position" is the number of shares of GCI Liberty Series A common stock reflected on the DTCC allocation report used by DTCC to distribute the Merger Consideration.

than by Cede, as nominee for DTCC (a "Closing Non-Cede Record Position"),

A.B. Data will make payment from the Net Settlement Fund directly to the record owner of each such Closing Non-Cede Record Position (the "Closing Non-Cede Record Holders") in an amount equal to the Per-Share Recovery times the number of shares of GCI Liberty Series A common stock comprising such Closing Non-Cede Record Position; *provided, however*, that all Closing Non-Cede Record Holders whose payment amount calculates to less than \$1.00 will be excluded from the distribution, with the funds allocated to such excluded stockholders reallocated and paid on a *pro rata* basis to those Closing Non-Cede Record Holders whose calculated share of the Net Settlement Fund is \$1.00 or greater.

d. For the avoidance of doubt, to the extent that any record owner, any DTCC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of GCI Liberty Series A common stock entitled to payment of the Merger Consideration, whether through permitting naked short-selling or the cash settlement of short positions or through any other means ("Increased Merger Consideration Entitlements"), such record owner, DTCC Participants, or their respective customers (including intermediaries) will be responsible for paying to the ultimate beneficial owners of such Increased

Merger Consideration Entitlements an amount equal to the Per-Share Recovery times the number of the Increased Merger Consideration Entitlements. Whether DTCC, any DTCC Participant, or DTCC Participants' customers are entitled to receive such funds from any such short-seller is not before this Court.

- e. Consistent with ¶ 46(iii) of the Plan of Allocation, for the avoidance of doubt, any person or entity who acquired shares of GCI Liberty Series A common stock on or before December 18, 2020, but had not settled those shares at the Merger's Closing ("Non-Settled Shares") will be treated as an Eligible Class Member with respect to those Non-Settled Shares (except for the Excluded Shares), and any person or entity who sold those Non-Settled Shares on or before December 18, 2020, will not be treated as an Eligible Class Member with respect to those Non-Settled Shares.
- f. Following the distribution of the Net Settlement Fund to DTCC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTCC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares.
- g. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks,

all Distribution checks will bear a notation "CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE]."

- h. Consistent with ¶ 46(iv) of the Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (i.e., more than six months from the check's issue date), the DTCC Participants and Closing Non-Cede Record Holders shall follow their respective policies with respect to further attempted distribution or escheatment.
- i. Paper copies of all supporting documentation may be destroyed one year after the distribution of the Net Settlement Fund, and electronic copies of the same may be destroyed one year after all funds in the Net Settlement Fund have been distributed.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed this 19th day of December.

ADAM D. WALTER

Sworn to and subscribed before me this 19th day of December 2022.

Notary Public
State of Florida, Palm Beach County

My Commission Expires: \_//

Personally Known or Produced Identification.

Type of Identification Produced:

Marybeth Greaney **Notary Public** State of Florida Comm# HH078003



# EXHIBIT A

Class Action Administration 600 A. B. Data Drive Milwaukee, WI 53217 414-961-7523 accounting@abdataclassaction.com abdataclassaction.com



 INVOICE
 INV00301742

 BERNSTEIN LITOWITZ BERGER &
 PAGE
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 GROSSMANN LLP
 DATE
 7/31/2021

 1285 AVENUE OF THE AMERICAS
 DATE
 7/31/2021

 NEW YORK, NY, 10019
 CLIENT
 107250

# **INVOICE**

#### JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Project/Database Setup (One-Time Fee)	1	4,500.00	\$4,500.00
Receipt and Processing of Bank/Broker/Nominee Lists for Mail	7	175.00	\$1,225.00
Website Setup and Design (One-Time Fee)	1	1,500.00	\$1,500.00
Toll-Free Telephone Line Setup (One-Time Fee)	1	1,000.00	\$1,000.00
Processing of Correspondence (Hourly)	0.75	48.00	\$36.00
Project Management (Hourly)	18.50	165.00	\$3,052.50
Project Management - Vice President (Hourly)	0.75	225.00	\$168.75
System Support (Hourly)	5.75	170.00	\$977.50
Staff (Hourly)	5.75	95.00	\$546.25
Printing and Mailing of Notice Packets	60,000	0.5100	\$30,600.00
Postage	17,886	0.450	\$8,048.70
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	7	0.44	\$3.08
CSRs/Live Operators (Per Hour)	0.25	48.00	\$12.00
800 Number Charges (Per Minute)	2	0.12	\$0.24
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
NCOA Address Updating (Minimum Charge)	1	850.0000	\$850.00
Post Office Box Rental/Renewal	1	1,260.00	\$1,260.00
Bank, Broker, and Nominee Fees	1	335.00	\$335.00

TOTAL \$54,480.02

**MAIL CHECKS TO** 

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

Class Action Administration 600 A. B. Data Drive Milwaukee, WI 53217 414-961-7523 accounting@abdataclassaction.com abdataclassaction.com



 INVOICE
 INV000301810

 PAGE
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 DATE
 8/31/2021

 CLIENT
 107250

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP 1285 AVENUE OF THE AMERICAS NEW YORK, NY, 10019 USA

# **INVOICE**

# JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	640	0.65	\$416.00
Receipt and Processing of Bank/Broker/Nominee Lists for Mail	5	175.00	\$875.00
Remailing of Notice Packets to Updated Addresses	404	0.89	\$359.56
Processing of Correspondence (Hourly)	1.50	48.00	\$72.00
Project Management (Hourly)	2.00	165.00	\$330.00
System Support (Hourly)	3.75	170.00	\$637.50
Staff (Hourly)	17.50	95.00	\$1,662.50
Postage	17,070	0.464	\$7,920.48
Investor's Business Daily (1/4-page)	1	8,911.60	\$8,911.60
PR Newswire (1,200 words)	1	4,043.75	\$4,043.75
Mayson Marketing - Print Ad Production	1	312.50	\$312.50
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	19	0.44	\$8.36
CSRs/Live Operators (Per Hour)	0.75	48.00	\$36.00
800 Number Charges (Per Minute)	39	0.12	\$4.68
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Document Imaging	3	0.15	\$0.45
Bank, Broker, and Nominee Fulfillment Expenses	1	8,820.08	\$8,820.08
Electronic Storage (Per Page/Per Month)	3	0.015	\$0.05

TOTAL \$34,775.51

**MAIL CHECKS TO** 

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

Class Action Administration 600 A. B. Data Drive Milwaukee, WI 53217 414-961-7523 accounting@abdataclassaction.com abdataclassaction.com ab

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP 1285 AVENUE OF THE AMERICAS NEW YORK, NY, 10019 
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 INV000301917

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 DATE
 9/30/2021

 CLIENT
 107250

# **INVOICE**

#### JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	177	0.65	\$115.05
Receipt and Processing of Bank/Broker/Nominee Lists for Mail	1	175.00	\$175.00
Remailing of Notice Packets to Updated Addresses	46	0.89	\$40.94
Processing of Correspondence (Hourly)	0.50	48.00	\$24.00
Project Management (Hourly)	2.25	165.00	\$371.25
System Support (Hourly)	2.00	170.00	\$340.00
Staff (Hourly)	2.00	95.00	\$190.00
Printing and Mailing of Notice Packets	80,000	0.4814	\$38,512.00
Postage	952	0.732	\$696.86
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	73	0.44	\$32.12
CSRs/Live Operators (Per Hour)	2.50	48.00	\$120.00
800 Number Charges (Per Minute)	100	0.12	\$12.00
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
NCOA Address Updating (Minimum Charge)	1	850.0000	\$850.00
Advanced Address Updates	1,095	1.10	\$1,204.50
Document Imaging	7	0.15	\$1.05
Bank, Broker, and Nominee Fulfillment Expenses	1	66,566.12	\$66,566.12
Electronic Storage (Per Page/Per Month)	10	0.015	\$0.15

TOTAL \$109,616.04

**MAIL CHECKS TO** 

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

Class Action Administration 600 A. B. Data Drive Milwaukee, WI 53217 414-961-7523 accounting@abdataclassaction.com abdataclassaction.com ab

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# **INVOICE**

# JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	43	0.65	\$27.95
Remailing of Notice Packets to Updated Addresses	4	0.89	\$3.56
Processing of Correspondence (Hourly)	0.50	48.00	\$24.00
Project Management (Hourly)	3.00	165.00	\$495.00
System Support (Hourly)	0.75	170.00	\$127.50
Staff (Hourly)	0.50	95.00	\$47.50
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	25	0.44	\$11.00
CSRs/Live Operators (Per Hour)	1.00	48.00	\$48.00
800 Number Charges (Per Minute)	105	0.12	\$12.60
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Advanced Address Updates	234	1.10	\$257.40
Document Imaging	12	0.15	\$1.80
Electronic Storage (Per Page/Per Month)	22	0.015	\$0.33

TOTAL \$1,421.64

**MAIL CHECKS TO** 

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

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# **INVOICE**

# JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	4	0.65	\$2.60
Remailing of Notice Packets to Updated Addresses	1	0.89	\$0.89
Processing of Correspondence (Hourly)	3.75	48.00	\$180.00
Project Management (Hourly)	5.50	165.00	\$907.50
System Support (Hourly)	0.25	170.00	\$42.50
Staff (Hourly)	0.25	95.00	\$23.75
Postage	5	0.710	\$3.55
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	20	0.44	\$8.80
CSRs/Live Operators (Per Hour)	0.50	48.00	\$24.00
800 Number Charges (Per Minute)	33	0.12	\$3.96
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Document Imaging	37	0.15	\$5.55
Electronic Storage (Per Page/Per Month)	37	0.015	\$0.56

TOTAL \$1,568.66

**MAIL CHECKS TO** 

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

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# **INVOICE**

# JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	8	0.65	\$5.20
Processing of Correspondence (Hourly)	3.75	48.00	\$180.00
Project Management (Hourly)	4.50	165.00	\$742.50
Staff (Hourly)	1.75	95.00	\$166.25
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	11	0.44	\$4.84
CSRs/Live Operators (Per Hour)	0.50	48.00	\$24.00
800 Number Charges (Per Minute)	37	0.12	\$4.44
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	81	0.015	\$1.22

TOTAL \$1,493.45

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# **INVOICE**

JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Project Management (Hourly)	1.25	165.00	\$206.25
Staff (Hourly)	0.50	95.00	\$47.50
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	10	0.44	\$4.40
CSRs/Live Operators (Per Hour)	0.25	48.00	\$12.00
800 Number Charges (Per Minute)	31	0.12	\$3.72
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.940	\$0.94

TOTAL \$639.81

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# **INVOICE**

#### JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	1	0.65	\$0.65
Project Management (Hourly)	14.25	165.00	\$2,351.25
Staff (Hourly)	0.50	95.00	\$47.50
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	13	0.44	\$5.72
CSRs/Live Operators (Per Hour)	0.50	48.00	\$24.00
800 Number Charges (Per Minute)	16	0.12	\$1.92
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.900	\$0.90

TOTAL \$2,796.94

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# **INVOICE**

JOB 54473 **GCI Liberty** 

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	1	0.65	\$0.65
Project Management (Hourly)	6.00	165.00	\$990.00
Staff (Hourly)	1.00	95.00	\$95.00
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	12	0.44	\$5.28
CSRs/Live Operators (Per Hour)	1.75	48.00	\$84.00
800 Number Charges (Per Minute)	12	0.12	\$1.44
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.890	\$0.89

**TOTAL** \$1,542.26

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD. **SEND WIRES TO** US BANK, N.A.

400 W. Brown Deer Road, Bayside, WI 53217 Routing Number 075000022 Account Number 182377466541 (AB Data, Ltd.) Swift Code USBKUS44IMT

Class Action Administration 600 A. B. Data Drive Milwaukee, WI 53217 accounting@abdataclassaction.com abdataclassaction.com

414-961-7523



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# **INVOICE**

JOB 54473 **GCI Liberty** 

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	2	0.65	\$1.30
Project Management (Hourly)	10.25	165.00	\$1,691.25
Staff (Hourly)	0.25	95.00	\$23.75
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	13	0.44	\$5.72
CSRs/Live Operators (Per Hour)	0.50	48.00	\$24.00
800 Number Charges (Per Minute)	61	0.12	\$7.32
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.900	\$0.90

**TOTAL** \$2,119.24

**MAIL CHECKS TO** 

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

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#### JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Project Management (Hourly)	5.75	165.00	\$948.75
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	9	0.44	\$3.96
800 Number Charges (Per Minute)	26	0.12	\$3.12
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.900	\$0.90

TOTAL \$1,321.73

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# **INVOICE**

# JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	1	0.65	\$0.65
Project Management (Hourly)	7.50	165.00	\$1,237.50
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	7	0.44	\$3.08
CSRs/Live Operators (Per Hour)	0.75	48.00	\$36.00
800 Number Charges (Per Minute)	10	0.12	\$1.20
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.900	\$0.90

TOTAL \$1,644.33

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

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DESCRIPTION	QTY	PRICE	AMOUNT
Project Management (Hourly)	6.00	165.00	\$990.00
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	7	0.44	\$3.08
800 Number Charges (Per Minute)	15	0.12	\$1.80
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	70.890	\$70.89

**TOTAL** \$1,430.77

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#### JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Project Management (Hourly)	19.75	165.00	\$3,258.75
Staff (Hourly)	0.25	95.00	\$23.75
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	3	0.44	\$1.32
800 Number Charges (Per Minute)	15	0.12	\$1.80
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Post Office Box Rental/Renewal	1	1,340.00	\$1,340.00
Electronic Storage (Per Page/Per Month)	1	0.900	\$0.90

TOTAL \$4,991.52

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# **INVOICE**

# JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Project Management (Hourly)	5.25	165.00	\$866.25
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	8	0.44	\$3.52
CSRs/Live Operators (Per Hour)	0.25	48.00	\$12.00
800 Number Charges (Per Minute)	15	0.12	\$1.80
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.900	\$0.90

**TOTAL** \$1,249.47

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# **INVOICE**

# JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Receipt and Processing of Undeliverable Mail	1	0.65	\$0.65
Project Management (Hourly)	4.00	165.00	\$660.00
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	3	0.44	\$1.32
800 Number Charges (Per Minute)	6	0.12	\$0.72
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage (Per Page/Per Month)	1	0.900	\$0.90

TOTAL \$1,028.59

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

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#### JOB 54473 GCI Liberty

DESCRIPTION	QTY	PRICE	AMOUNT
Project Management (Hourly)	0.50	165.00	\$82.50
Website Maintenance/Hosting (Monthly)	1	175.00	\$175.00
Interactive Voice Response (IVR) (Per Minute)	2	0.44	\$0.88
CSRs/Live Operators (Per Hour)	0.25	48.00	\$12.00
800 Number Charges (Per Minute)	11	0.12	\$1.32
IVR and Line Maintenance (Monthly)	1	190.00	\$190.00
Electronic Storage	1	0.900	\$0.90

**TOTAL** \$462.60

PO Box 170062, Milwaukee, WI 53217 Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO** 



# A.B. Data, Ltd.

Class Action Administration Company 600 A.B. Data Drive

Milwaukee, WI 53217 Case Name: GCI Liberty

Date: December 12, 2022

# Initial Distribution Estimate

# GCI Liberty

	Quantity	Rate (\$)	Estima	ted Cost (\$
Professional Fees				
Project Management (hourly)	40	165	\$	6,600
System Support (hourly)	8	170	\$	1,360
Staff (hourly)	8	95	\$	760
Quality Assurance (hourly)	8	145	\$	1,160
Accounting (hourly)	10	165	\$	1,650
Distribution				
Distribution Setup	1	750	\$	750
Printing and Mailing of Checks to Record Holders (minimum batch rate)	1,450	1.50	\$	2,175
Bank Account Reconciliation (monthly)	12	175	\$	2,100
Receive and Process Undeliverable Checks	125	3.25	\$	406.25
Reissue Checks to Updated Addresses	115	4.50	\$	517.50
Postage				
Postage - Checks (up to 1-ounce USPS Presort Rate)	1,450	0.57	\$	826.50
Postage - Check Reissues (up to 1-ounce USPS Presort Rate)	115	0.57	\$	65.55
Miscellaneous Out-of-Pocket Expenses				
Advanced Address Updates	1,450	1.10	\$	1,595
DTCC charge for distribution (estimate)	1	20,000	\$	20,000
Tax Reserve 2022 and 2023	2	2,500	\$	5,000
Check Processing Fee (per check)	1,450	0.15	\$	217.50
Other Miscellaneous Expenses, including labels, supplies, overnight shipments, and				
other miscellaneous charges and expenses				150
	Total Estimate	d Project Cost	\$	45,333.30

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