

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X	
CONSTRUCTION LABORERS PENSION	:	Civil Action No. 1:18-cv-07796-VEC
TRUST FOR SOUTHERN CALIFORNIA,	:	(Consolidated)
GENE SAMIT and JOHN LANTZ,	:	
Individually and on Behalf of All Others	:	<u>CLASS ACTION</u>
Similarly Situated,	:	
	:	SUPPLEMENTAL DECLARATION OF
Plaintiffs,	:	ROSS D. MURRAY REGARDING
	:	NOTICE DISSEMINATION AND
vs.	:	REQUESTS FOR EXCLUSION
	:	RECEIVED TO DATE
CBS CORPORATION and LESLIE	:	
MOONVES,	:	
	:	
Defendants.	:	
	X	

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

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s May 13, 2022 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”) (ECF 188), Gilardi was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned action (the “Action”). I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (the “Initial Mailing Declaration”) (ECF 199). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE

3. As more fully detailed in the Initial Mailing Declaration, as of August 18, 2022, Gilardi had mailed 162,114 copies of the Court-approved Notice of Pendency and Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Settlement Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

4. Since August 18, 2022, Gilardi has mailed an additional 8,196 copies of the Claim Package in response to requests from potential Settlement Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of October 25, 2022, Gilardi has mailed a total of 170,310 Claim Packages to potential Settlement Class Members and nominees.

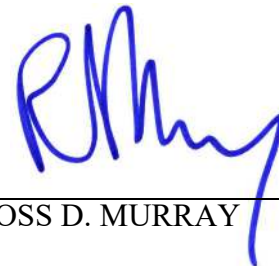
REQUESTS FOR EXCLUSION RECEIVED TO DATE

5. Pursuant to the Notice Order, the Notice informed potential Settlement Class Members that written requests for exclusion from the Settlement Class must be mailed to *CBS Securities Settlement*, c/o Gilardi & Co. LLC, EXCLUSIONS, P.O. Box 5100, Larkspur, CA

94977-5100, such that they are postmarked no later than September 19, 2022. At the time of the Initial Mailing Declaration, Gilardi reported that it had received two requests for exclusion in connection with this Settlement. *See* Initial Mailing Declaration, ¶16.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has received three additional requests for exclusion, redacted copies of which are attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 26th day of October, 2022, at San Rafael, California.



ROSS D. MURRAY

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 27, 2022, 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 on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Vincent M. Serra

VINCENT M. SERRA

ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Email: vserra@rgrdlaw.com

Mailing Information for a Case 1:18-cv-07796-VEC Samit v. CBS Corporation et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Laura Andracchio**
LAndracchio@rgrdlaw.com
- **Mary Katherine Blasy**
mblasy@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **David W. Brown**
dbrown@paulweiss.com,Mao_fednational@paulweiss.com
- **Spencer A. Burkholz**
spenceb@rgrdlaw.com,e_file_sd@rgrdlaw.com,kjohnson@rgrdlaw.com,scaesar@rgrdlaw.com
- **Steven M. Cady**
scady@wc.com,steven-cady-9941@ecf.pacerpro.com
- **Alexander Leonard Cheney**
acheney@willkie.com,maosdny@willkie.com
- **Todd G. Cosenza**
tcosenza@willkie.com,maosdny@willkie.com
- **Scott A Edelman**
sedelman@gibsondunn.com
- **Zeh Sheena Ekono**
maosdny@willkie.com,zekono@willkie.com
- **Brad D. Feldman**
bfeldman@paulweiss.com,mao_fednational@paulweiss.com
- **Jonah H. Goldstein**
jonahg@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Richard Francis Hans , Jr**
Richard.Hans@dlapiper.com,ivy.hamlin@dlapiper.com,DocketingNewYork@dlapiper.com,new-york-docketing-7871@ecf.pacerpro.com,richard-hans-7005@ecf.pacerpro.com
- **Joseph Alexander Hood , II**
ahood@pomlaw.com,tsayre@pomlaw.com,disaacson@pomlaw.com,ashmatkova@pomlaw.com,abarbosa@pomlaw.com,fgravenson@pomlaw.com
- **Phillip C. Kim**
pkim@rosenlegal.com,pkrosenlaw@ecf.courtdrive.com
- **Daniel Jonathan Kramer**
dkramer@paulweiss.com,bmcginty@paulweiss.com,mao_fednational@paulweiss.com
- **Laurie L. Largent**
llargent@rgrdlaw.com
- **Andrew J. Levander**
andrew.levander@dechert.com,christopher.ruhland@dechert.com,nycmanagingclerks@dechert.com,AutoDocket@dechert.com,9833472420@filings.docketbird.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,ahood@pomlaw.com,asoto@pomlaw.com,disaacson@pomlaw.com,ashmatkova@pomlaw.com,abarbosa@pomlaw.com
- **Angela Liu**
angela.liu@dechert.com
- **Jessica Ann Masella**
Jessica.Masella@dlapiper.com,jessica-masella-8419@ecf.pacerpro.com
- **Margaret Mortimer**
margaret.mortimer@dechert.com
- **Rahul Mukhi**
rmukhi@cgsh.com,maofiling@cgsh.com
- **Tariq Mundiya**
maosdny@willkie.com,tmundiya@willkie.com
- **Sharon L. Nelles**
NELLESS@SULLCROM.COM,s&cmanagingclerk@sullcrom.com,sharon-nelles-8045@ecf.pacerpro.com
- **New York Office of the Attorney General**
shamiso.maswoswe@ag.ny.gov

- **Beth Deborah Newton**
newtonb@sullcrom.com,s&cmanagingclerk@sullcrom.com,beth-newton-9897@ecf.pacerpro.com
- **Jonathan Bradley Pitt**
jpitt@wc.com,jonathan-pitt-1187@ecf.pacerpro.com
- **Andrew R. Podolin**
APodolin@perkinscoie.com,RKOManagingClerk@rkollp.com
- **Matthew McPherson Balf Riccardi**
MRiccardi@perkinscoie.com,MAplogan@perkinscoie.com,michellerose@perkinscoie.com,docketnyc@perkinscoie.com,nvargas@perkinscoie.com
- **Lee S Richards , III**
LeeRichards@perkinscoie.com,michellerose@perkinscoie.com,nvargas@perkinscoie.com
- **Katharine Rodgers**
rodgersk@sullcrom.com,katherine-rodgers-0146@ecf.pacerpro.com,s&cmanagingclerk@sullcrom.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,drosenfeld@ecf.courtdrive.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Vincent Michael Serra**
vserra@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Audra Jan Soloway**
asoloway@paulweiss.com,mao_fednational@paulweiss.com
- **Ellen Anne Gusikoff Stewart**
elleng@rgrdlaw.com
- **Brendan V. Sullivan , Jr**
bsullivan@wc.com

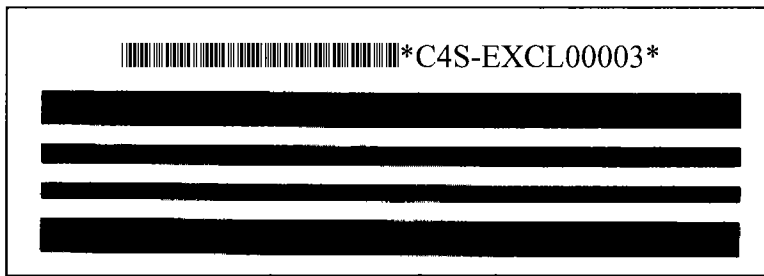
Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

John Lantz

,

EXHIBIT A



RECEIVED
August 15, 2022
Claims Center

Exclusion Cover Page

Case Name: CBS Securities Settlement

Case Code: C4S

Exclusion Deadline: September 19, 2022 (postmarked on or before)

Name of Person Filing Exclusion: Michael G Smith

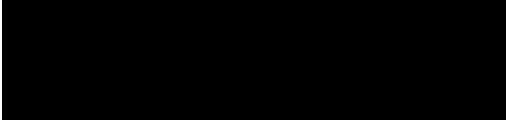
Dear Sirs :

I choose not to seek any compensation, or press any charges to Leslie Moonves, or CBS over the Class Action lawsuit filed. I did have CBS in my portfolio during those troubled times. I recall when Mr. Moonves (the CEO) was ill, and it was at that time that certain people, or parties, brought charges to him and CBS. I don't know what happened, but I don't want to have anything to do with it. Can you please allow me to be excluded from the lawsuit. I have no grudges or want to show any interest in bringing suit against anyone involved. Again, if you can excuse me from this mess, I would be relieved, thank you.

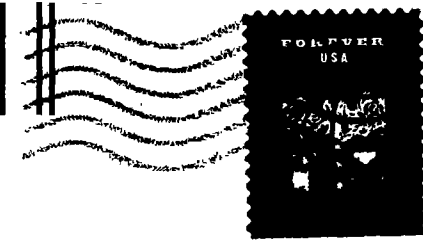
Sincerely yours,

Michael G. Smith
Michael J. Smith

Michael G. Smith



11 AUG 2022 PM 1 1

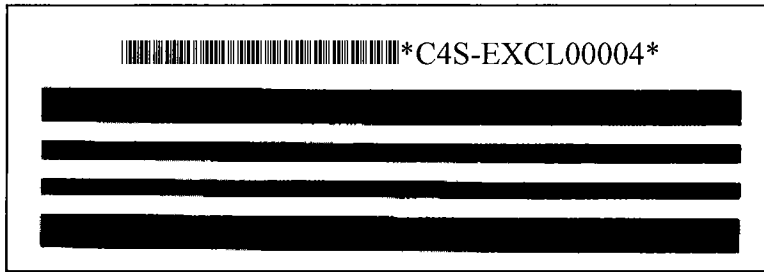


REC-1134
AUG 19 2022
CLAIMS CENTER

CBS Securities Settlement
Claims Administrator
c/o Gilardi & Co. LLC
PO Box 8040
San Rafael CA 94912-8040

C4S





RECEIVED
Sept 12, 2022
Claims Center

Exclusion Cover Page

Case Name: CBS Securities Settlement

Case Code: C4S


Exclusion Deadline: September 19, 2022 (postmarked on or before)

Name of Person Filing Exclusion: Heather D and Joe T Mangum Jr

CBS Securities Settlement
Claims Administrator
c/o Girardi & Co. LLC
PO BOX 8040
San Rafael, CA 94912-8040

September 7, 2022

Heather D. Mangum
Joe T. Mangum, Jr.



TO WHOM IT MAY CONCERN:

We received the class action documents regarding litigation against CBS Corporation and Leslie Moonves.

We did purchase CBS Corp CLB stock in the fore mentioned time period. However, we do not wish to be included in this class action membership. We are "opting out" or excluding ourselves from this settlement.

Enclosed please find our proof of claim and release form.

We intentionally did not return any proof of ownership of CBS Corp CLB stock since we are not receiving any potential money in regards to this settlement.

Sincerely,

~~Heather Mangum~~ Joe T. Mangum, Jr.

Must Be Postmarked (if Mailed)
or Received (if Submitted Online)
No Later Than September 19, 2022

C4S

Official
Office
Use
Only

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Samit, et al. v. CBS Corporation, et al.

No. 1:18-cv-07796-VEC

PROOF OF CLAIM AND RELEASE

Please Type or Print in the Boxes Below
Do NOT use Red Ink, Pencil, or Staples

PART I. CLAIMANT IDENTIFICATION

Last Name

MANGUM

M.I. First Name

D. HEATHER

Last Name (Co-Beneficial Owner)

MANGUM, JR.

M.I. First Name (Co-Beneficial Owner)

T. JOE

IRA

Joint Tenancy

Employee

Individual

Other

TOD

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA (specify)

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Last Four Digits of Social Security Number

Taxpayer Identification Number

or

Telephone Number (Primary Daytime)

Telephone Number (Alternate)

Email Address

MAILING INFORMATION

Address

OLD

Address (Cont.)

City

State

ZIP Code

Foreign Province

Foreign Postal Code

Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB	CB	ATP KB ICI	BE DR EM	FL ME ND	OP RE SH	1 1	FOR CLAIMS PROCESSING ONLY
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A. Number of shares of CBS Class B common stock held at the close of trading on November 28, 2017:

29,000,000

Proof Enclosed?
 Y N

B. Purchases or acquisitions of CBS Class B common stock (November 29, 2017 – October 26, 2018, inclusive):

PURCHASES				Total Purchase or Acquisition Price (Excluding Commissions, Taxes and Fees). Please round off to the nearest whole dollar	Proof of Purchase Enclosed?			
Trade Date(s) of Shares (List Chronologically)				Number of Shares Purchased or Acquired				
M	M	D	D	Y	Y	Y		
1.	03	23	2017	29,000,000	\$	67	.00	<input checked="" type="radio"/> Y <input type="radio"/> N
2.	07	05	2018	12,000,000	\$	57	.00	<input checked="" type="radio"/> Y <input type="radio"/> N
3.	07	06	2018	13,000,000	\$	58	.00	<input checked="" type="radio"/> Y <input type="radio"/> N
4.	/	/			\$.	.00	<input type="radio"/> Y <input checked="" type="radio"/> N
5.	/	/			\$.	.00	<input type="radio"/> Y <input checked="" type="radio"/> N

IMPORTANT: (i) If any purchase listed covered a short sale, please mark Yes: Yes

(ii) If you received shares through an acquisition or merger, please identify the date, the share amount and the company acquired:

M M D D Y Y Y Y

Merger Shares:

Company:

/ /

C. Sales of CBS Class B common stock (November 29, 2017 – October 26, 2018, inclusive):

SALES				Total Sales Price (Excluding Commissions, Taxes and Fees). Please round off to the nearest whole dollar	Proof of Sales Enclosed?			
Trade Date(s) of Shares (List Chronologically)				Number of Shares Sold				
M	M	D	D	Y	Y	Y		
1.	/	/			\$.	.00	<input type="radio"/> Y <input checked="" type="radio"/> N
2.	/	/			\$.	.00	<input type="radio"/> Y <input checked="" type="radio"/> N
3.	/	/			\$.	.00	<input type="radio"/> Y <input checked="" type="radio"/> N
4.	/	/			\$.	.00	<input type="radio"/> Y <input checked="" type="radio"/> N
5.	/	/			\$.	.00	<input type="radio"/> Y <input checked="" type="radio"/> N

D. Number of shares of CBS Class B common stock held at the close of trading on July 27, 2018:

54,000,000

Proof Enclosed?
 Y N

E. Number of shares of CBS Class B common stock held at the close of trading on October 26, 2018:

54,000,000

Proof Enclosed?
 Y N

If you require additional space, attach extra schedules in the same format as above.
 Sign and print your name on each additional page.

YOU MUST READ AND SIGN THE RELEASE ON PAGE 6. FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.



The Settling Parties acknowledge that they may hereafter discover facts, legal theories or authorities in addition to or different from those which they or their respective counsel now know or believe to be true with respect to the subject matter of the Released Plaintiff's Claims or Released Defendants' Claims that, had they known, may have affected their decision to enter into the Stipulation, but they are notwithstanding this potential entering into the Stipulation and intend it to be a full, final, and permanent resolution of the matters at issue in the Action. The Settling Parties acknowledge, and each Releasing Plaintiff Party and Released Defendant Party shall, by operation of law, be deemed to have acknowledged, that the foregoing waiver and the inclusion of the "Unknown Claims" in the definition of the Released Plaintiff's Claims and Released Defendants' Claims was separately bargained for and was a material element of the Settlement.

5. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

6. I (We) hereby warrant and represent that I (we) have included the information requested about all of my (our) transactions in CBS Class B common stock which are the subject of this claim, which occurred during the Settlement Class Period, as well as the opening and closing positions in such shares held by me (us) on the dates requested in this Claim Form.

I declare under penalty of perjury under the laws of the United States of America that all of the foregoing information supplied on this Proof of Claim by the undersigned is true and correct.

Executed this 07 day of September/2022 in [Redacted]
(Month/Year) (City/State/Country)

Heather D. Mangum
(Sign your name here)

Joe T. Mangum, Jr.
(Sign your name here)

Heather D. Mangum
(Type or print your name here)

Joe T. Mangum, Jr.
(Type or print your name here)

Beneficial Purchaser
(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)

Beneficial Purchaser
(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.**

Reminder Checklist:

- 1. Please sign the above release and acknowledgment. ✓
- 2. If this claim is being made on behalf of Joint Claimants, then both must sign. ✓
- 3. Remember to attach copies of supporting documentation, if available.
- 4. **Do not send** originals of certificates.
- 5. Keep a copy of your Claim Form and all supporting documentation for your records. ✓
- 6. If you desire an acknowledgment of receipt of your Claim Form, please send it Certified Mail, Return Receipt Requested.
- 7. If you move, please send your new address to the address below. ✓
- 8. **Do not use red pen or highlighter** on the Claim Form or supporting documentation.

**THIS PROOF OF CLAIM MUST BE SUBMITTED ONLINE OR MAILED NO LATER THAN SEPTEMBER 19, 2022,
ADDRESSED AS FOLLOWS:**

CBS Securities Settlement
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040
www.CBSSecuritiesSettlement.com



Heather and Joe Mangum



04 SEP 2022 PM 1.7



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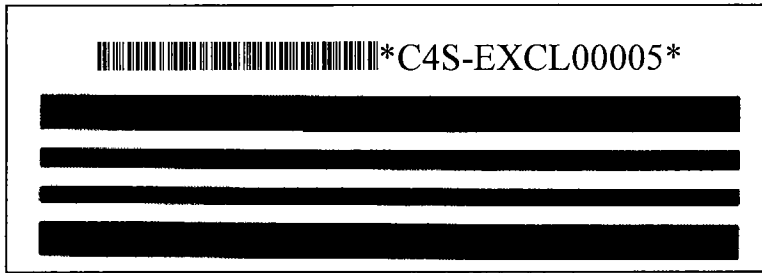
SEP 12 2022

CLAIMS CENTER

CBS Securities Settlement
Claims Administrator
c/o Gilardi & Co. LLC
PO Box 8040
San Rafael CA 94912-8040

C4S





RECEIVED
September 28, 2022
Claims Center

Exclusion Cover Page

Case Name: CBS Securities Litigation

Case Code: C4S

Exclusion Deadline: September 19, 2022 (Postmarked on or before)

Name of Person Filing Exclusion: Malta Pension Investments

Malta Pension Investments

Malta Pension Investments
Aragon House, Dragonara Road
St Julian's STJ 3140, Malta

Ihr Zeichen
Your Reference

Unser Zeichen/Datum
Our Reference/Date

Telefon/Telefax
Phone/Telefax

USA
CBS Securities Settlement
c/o Gilardi & Co. LLC
EXCLUSIONS
P O Box 5100
Larkspur, CA 94977-5100

12th September 2022

Request exclusion from the Settlement Class in the CBS Securities Settlement

Name: MALTA PENSION INVESTMENTS

Address: Aragon House, Business Centre
Dragonara Road,
St. Julians STJ3140
Malta

Contact: Markus Pawlik, Managing Director

Email: markus.pawlik@lmp.com.mt

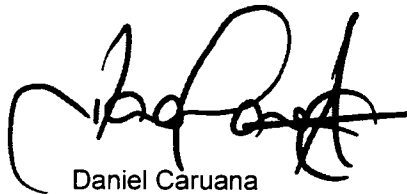
Telephone: +357 2031 2901

Trading history and proof of ownership being in the attached custodian certificate.



Markus Pawlik

Managing Director



Daniel Caruana

Authorised Signatory



State Street Bank International GmbH
Zweigniederlassung Luxemburg

49, avenue J.F. Kennedy
L 1855 Luxembourg

T +352 464 010 1
R C S Luxembourg B 148186

www.statestreet.com

Luxembourg, September 8th, 2022

Re: Statement of positions CBS CORP

For the Claimant: Malta Pension Investments

To Whom It May Concern,

We, State Street Bank International GmbH, Luxembourg branch, act or acted as the custodian bank for the securities listed in the attached Exhibit. We hereby certify that the transactions and holdings for the securities shown in the attached Exhibit are accurate for the dates indicated therein.

The Claimant is/was the legal and beneficial owner of the securities listed in the attached Exhibit and holds all rights and obligations relating to these securities.

State Street Bank International GmbH, Luxembourg Branch

Rui Digitally signed
by Rui Machado
Machado Date: 2022.09.12
11:52:43 +02'00'

Name:

Title:

State Street Bank International GmbH
 Zentrale Geschäftsstelle
 2, Avenue de la Liberté
 L-1052 Luxembourg

2, Avenue de la Liberté
 L-1052 Luxembourg

Tel: +352 414 01 11
 R.C.S. Luxembourg B 148186

2, Avenue de la Liberté

FUND	FUND NAME	CUSIP	CUSIP DESCRIPTION	CONT SETL DATE	TRADE DATE	STL LOC	TRAN TYPE	SHARES	LOCAL NET AMOUNT	LOCAL COMMISSION	AS OF SHARE / PAR POSITION	BROKER NAME	UNIT PRICE	LOCAL FEES	TAXES	TR CUR
					29 November 2017		Opening balance				648,000					
MP51	Us Equity (Bnp)	124857202	CBS CORP CLASS B NON VOTING COMMON STOCK USD.001	08 February 2018	06 February 2018	DTC	SELL	(948,000)	(25,831.16)	(0.00)	0,000	CITIGROUP GLOBAL MARKETS LIMITED	53.81	0.00	0.81	USD
					27 July 2018		Closing balance				0,000					

State Street Bank International GmbH
 Aufsichtsratsvorsitzender: Jörg A. Wimmer
 Geschäftsführer: Stefan Gmür, Vincent Bako, Diane Delbecq, James Eagan
 Andreas Niklaus, Kai Wallinghoff
 Sitz: München, Breunelstraße 59, D-80333 München, Deutschland München HRB 12672

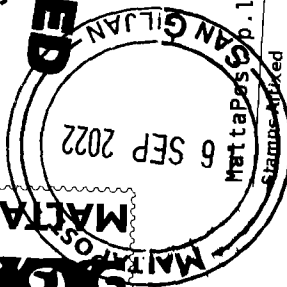
Malta Pension Investments
Aragon House, Business Centre Level 4
Dragonara Road
St. Julians STJ 3140, Malta



KCC

SEP 28 2022

RECEIVED



Malta Post p.l.c. 16-Sep-2022
Stamp Applied

0.30 Foreign Post - Letters Registered

Total Postage Value

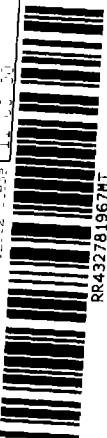
€ **6.75**

Destination

USA

WEIGHT 0.020 Kg

REGION ZONE B



RR432781967MT



Customer's Signature and ID

RR432781967MT



REGISTERED
SEP 28 2022
BUSINESS CENTRE



Registered Item
RR432781967MT

RR