

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION**

CAMELOT EVENT DRIVEN FUND, A SERIES
OF FRANK FUNDS TRUST, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

-against-

MORGAN STANLEY & CO. LLC, J.P.
MORGAN SECURITIES, LLC, CITIGROUP
GLOBAL MARKETS INC., GOLDMAN SACHS
& CO. LLC, MIZUHO SECURITIES USA LLC,
SIEBERT WILLIAMS SHANK & CO., LLC, BNP
PARIBAS SECURITIES CORP., RBC CAPITAL
MARKETS, LLC, U.S. BANCORP
INVESTMENTS, INC., SMBC NIKKO
SECURITIES AMERICA, INC., TD SECURITIES
(USA) LLC, SG AMERICAS SECURITIES, LLC,
MUFG SECURITIES AMERICAS INC.,
CASTLEOAK SECURITIES, L.P., SAMUEL A.
RAMIREZ & COMPANY, INC., ACADEMY
SECURITIES, INC., R. SEELAUS & CO., LLC,
WELLS FARGO SECURITIES, LLC, BNY
MELLON CAPITAL MARKETS, LLC, INTESA
SANPAOLO S.P.A., ICBC STANDARD BANK
PLC, VIACOMCBS, INC., ROBERT M. BAKISH,
KATHERINE GILL-CHAREST, SHARI E.
REDSTONE, CANDACE K. BEINECKE,
BARBARA M. BYRNE, LINDA M. GRIEGO,
ROBERT N. KLIEGER, JUDITH A. MCHALE,
RONALD L. NELSON, CHARLES E. PHILLIPS,
JR., SUSAN SCHUMAN, NICOLE SELIGMAN,
and FREDERICK O. TERRELL,

Defendants.

Index No. 654959/2021

**SUPPLEMENTAL AFFIRMATION
OF LUIGGY SEGURA
REGARDING: (A) MAILING OF
THE NOTICE AND CLAIM FORM
(B) REPORT ON REQUESTS FOR
EXCLUSION RECEIVED; AND
(C) REPORT ON CLAIMS
RECEIVED TO DATE**

I, LUIGGY SEGURA, affirm as follows:

1. I am the Vice President of Securities Operations at JND Legal Administration (“JND”).¹ Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice dated April 3, 2025 (NYSCEF Doc. No. 1602) (the “Notice Order”), Class Counsel were authorized to retain JND to supervise and administer the notice procedure as well as the processing of claims in connection with the Settlement of the above-captioned action (the “Action”). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I submit this affirmation as a supplement to the earlier affirmation, the Affirmation of Jennifer Ventriglia Regarding: (A) Mailing of the Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusions Received to Date, dated June 30, 2025 (NYSCEF Doc. No. 1974) (the “Initial Mailing Affirmation”).

CONTINUED DISSEMINATION OF THE NOTICE PACKET

3. Since the execution of the Initial Mailing Affirmation, JND has continued to disseminate copies of the Notice and Claim Form (together, the “Notice Packet”) in response to additional requests from potential Class Members and nominees. As of the date of this affirmation, a total of 70,936 Notice Packets have been mailed and 33,278 Notice Packets have been emailed. Accordingly, a total of 104,214 Notice Packets have been disseminated to potential Class Members and nominees.

¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement dated March 27, 2025 (NYSCEF Doc. No. 1599) (the “Stipulation”).

TELEPHONE AND SETTLEMENT WEBSITE

4. JND continues to maintain the toll-free telephone helpline 866-287-0741 and interactive voice response system to accommodate inquiries from Class Members. JND also continues to maintain the dedicated website for the Action (www.ViacomArchegosSecuritiesLitigation.com) in order to assist Class Members. On July 2, 2025, JND posted to the website copies of the papers filed in support of (i) Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation and (ii) Class Counsel's Motion for Attorneys' Fees and Litigation Expenses. JND will continue to maintain and, as appropriate, update the Settlement website and toll-free telephone helpline until the conclusion of this administration.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE

5. The Notice informs potential Class Members that requests for exclusion from the Class must be submitted by mail addressed to Viacom Archegos Securities Litigation, EXCLUSIONS, c/o JND Legal Administration, P.O. Box 91010, Seattle, WA 98111, and must be received no later than July 15, 2025. As of the date of this affirmation, JND has not received any requests for exclusion.

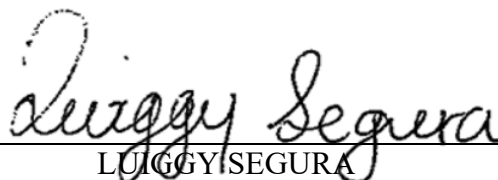
CLAIMS RECEIVED TO DATE

6. The Notice and Claim Form also informed potential Class Members that if they wished to participate in the Settlement that they must timely complete and return the Claim Form with adequate supporting documentation postmarked or submitted online no later than August 22, 2025.

7. As of July 25, 2025, JND has received approximately 3,197 claims. It is typical in securities class action cases for the vast majority of Claims to be filed in the days immediately

prior to the filing deadline. As a result, JND anticipates that the number of Claims received in this matter will increase substantially as we move closer to the August 22, 2025 claims filing deadline.

I affirm this 28th day of July, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



LUIGY SEGURA