

# EXHIBIT 4

**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

**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 EXCLUSION RECEIVED TO  
DATE**

I, JENNIFER VENTRIGLIA, affirm as follows:

1. I am Director of Securities Operations at JND Legal Administration (“JND”).<sup>1</sup> 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 in order to provide the Court and the parties to the Action with information regarding: (i) dissemination of the Court-approved Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys’ Fees and Litigation Expenses (the “Notice”) and the Proof of Claim and Release Form (the “Claim Form”) (collectively, the “Notice Packet”); (ii) publication of the Summary Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys’ Fees and Litigation Expenses (the “Summary Notice”); (iii) establishment of the website and toll-free telephone number dedicated to this Settlement; and (iv) the requests for exclusion from the Class received to date by JND.

### **DISSEMINATION OF THE NOTICE PACKET**

3. Pursuant to the Notice Order, JND was responsible for disseminating the Notice Packet to potential Class Members. A copy of the Notice Packet is attached hereto as Exhibit A.

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<sup>1</sup> 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”).

4. In connection with the initiation of the notice program, JND established a settlement database for this administration (the “Settlement Database”). The Settlement Database keeps a record of each person who is mailed a copy of the Notice Packet by JND.

5. On or about April 15, 2025, Class Counsel emailed to JND the data files provided by Defendants’ Counsel containing 1,383 unique names and addresses of potential Class Members and 2,498 email addresses.<sup>2</sup> Prior to the initial mailing JND ran the list through the United States Postal Service (“USPS”) National Change of Address (“NCOA”) database.<sup>3</sup> Based on its searches of the NCOA database, JND identified updated addresses for 755 potential Class Members prior to the initial mailing. The data file with the updated addresses was loaded into the Settlement Database, and on April 24, 2025, JND caused the Notice Packet to be sent by first-class mail to the 1,383 potential Class Members identified in the data file. JND also emailed Notice Packets to the 2,498 potential Class Members for which an email address was provided, including those with and without a physical mailing address.

6. As in most actions of this nature, a large majority of potential Class Members are expected to be beneficial purchasers whose securities are held in “street name,” *i.e.*, the securities are purchased by brokerage firms, banks, and other institutions (referred to as “nominees” or “records holders”) in the name of the nominee, on behalf of the beneficial purchasers. JND maintains a proprietary database with names and addresses of the largest and most common

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<sup>2</sup> In the event that both an email address and mailing address were provided for the same potential Class Member, a Notice was both emailed and mailed.

<sup>3</sup> The NCOA database is the official USPS technology product which makes change of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person has completed a change of address form with the USPS. The address information is maintained on the database for 48 months.

nominees that purchase securities on behalf of beneficial owners (the “Nominee Database”). At the time of the initial mailing, JND’s Nominee Database contained 4,074 records. On April 24, 2025, JND caused Notice Packets to be sent by first-class mail to the 4,074 mailing records contained in its Nominee Database and emailed 445 brokers where email addresses were available.

7. JND also researched filings with the U.S. Securities and Exchange Commission (“SEC”) on Form 13-F to identify additional institutions or entities who may have purchased Viacom Class B Common Stock issued in Viacom’s secondary public offering or Viacom 5.75% Series A Mandatory Convertible Preferred Stock issued in or traceable to Viacom’s initial public offering of that Preferred Stock. Based on this research, 1,699 address records were added to the list of potential Class Members. On April 24, 2025, JND caused Notice Packets to be sent by first-class mail to those potential Class Members.

8. In total, 10,099 Notice Packets were disseminated to potential Class Members and nominees by first-class mail or email on April 24, 2025.

9. The Notice directed those who purchased or otherwise acquired Viacom Class B Common Stock issued in Viacom’s Secondary Public Offering or Viacom 5.75% Series A Mandatory Convertible Preferred Stock issued in or traceable to Viacom’s Initial Public Offering of that Preferred Stock, for the beneficial interest of another person or entity, to within seven (7) calendar days of receipt of the Notice, either (a) request from JND sufficient copies of the Notice Packet to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Notice Packets forward them to all such beneficial owners, (b) request an email link to the Notice Packet and within seven (7) calendar days of receipt of the link forward it to all such beneficial owners, or (c) provide a list of the names, mailing addresses, and, if available, email addresses, of all such beneficial owners to JND (which would then mail copies of the Notice Packet

to those beneficial owners). JND followed up with phone calls and reminder postcards to the brokers and nominees to increase the response rate.

10. JND also provided a copy of the Notice to the Depository Trust Company (“DTC”) for posting on its Legal Notice System (“LENS”). The LENS may be accessed by any Nominee that is a participant in DTC’s security system. Accordingly, the Notice was posted on the DTC’s LENS on April 23, 2025.

11. Through June 30, 2025, JND has received 46,090 additional names and mailing addresses, and 422 email addresses, of potential Class Members from individuals or nominees. JND has also received requests from nominees for 17,110 Notice Packets to be forwarded directly by the nominees to their customers, and 29,913 nominees have requested a link to the Notice Packet. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

12. Through June 30, 2025, 70,356 Notice Packets have been mailed and 33,278 Notice Packets have been emailed. Accordingly, a total of 103,634 Notice Packets have been disseminated to potential Class Members and nominees.

### **PUBLICATION OF THE SUMMARY NOTICE**

13. In accordance with Paragraph 6(d) of the Notice Order, JND caused the Summary Notice to be published in *Wall Street Journal* and released via *PR Newswire* on May 8, 2025. Copies of proof of publication of the Summary Notice in *The Wall Street Journal* and over *PR Newswire* are attached hereto as Exhibit B. The Summary Notice released via *PR Newswire* has been available online since its publication on May 8, 2025.

### **SETTLEMENT WEBSITE**

14. On April 23, 2025, JND established a website (“Settlement Website”) dedicated to the Settlement, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com). The address for the Settlement Website is set forth in the Notice Packet and in the Summary Notice. The Settlement Website includes information regarding the Action and the proposed Settlement, including the exclusion, objection, and claim filing deadlines, and details about the Court’s Settlement Hearing. Downloadable copies of the Notice and Claim Form, as well as the Stipulation, Class Certification Order, Notice Order, and Complaint are posted on the Settlement Website. The Settlement Website also contains a secure online filing portal that allows Class Members to file a claim and receive a confirmation that their claim has been received by the Claims Administrator. The Settlement Website is accessible 24 hours a day, 7 days a week. JND will update the Settlement Website as necessary through the administration of the Settlement.

### **TELEPHONE HELPLINE**

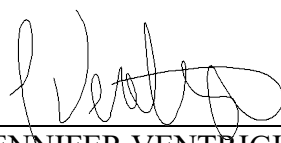
15. On April 23, 2025, JND established a case-specific, toll-free telephone helpline, 866-287-0741, with an interactive voice response system and live operators, to accommodate potential Class Members with questions about the Action and the Settlement. The automated attendant answers the calls and presents callers with a series of choices to respond to basic questions. Callers requiring further help have the option to be transferred to a live operator during business hours. JND continues to maintain the telephone helpline and will update the interactive voice response system as necessary through the administration of the Settlement.

### **REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE**

16. 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. Through June 27, 2025, JND has not received any requests for exclusion. JND will submit a supplemental affidavit after the July 15, 2025, deadline for requesting exclusion that will address any and all requests for exclusion received by JND.

I affirm this 30<sup>th</sup> day of June, 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.



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JENNIFER VENTRIGLIA



# EXHIBIT A

**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

Justice Andrew Borrok  
Part 53

**NOTICE OF (I) PENDENCY  
OF CLASS ACTION AND  
PROPOSED SETTLEMENT;  
(II) SETTLEMENT HEARING;  
AND (III) MOTION FOR  
ATTORNEYS' FEES AND  
LITIGATION EXPENSES**

**TO:** All persons and entities who purchased or otherwise acquired

(i) ViacomCBS Inc. (“Viacom”) Class B Common Stock (“Viacom Common Stock”) issued in Viacom’s secondary public offering, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021 (“Viacom Common Stock Secondary Public Offering”); and/or

(ii) Viacom 5.75% Series A Mandatory Convertible Preferred Stock (“Viacom Preferred Stock”) issued in or traceable to Viacom’s initial public offering of that Preferred Stock, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021 (“Viacom Preferred Stock Initial Public Offering”; and together with the Viacom Common Stock Secondary Public Offering, the “Offerings”), and were damaged thereby (the “Class”).<sup>1</sup>

**This notice was authorized by the Court. It is not a solicitation from a lawyer.**

**NOTICE OF PENDENCY OF CLASS ACTION:** Please be advised that your rights may be affected by the above-captioned securities class action (the “Action”) if you are a member of the Class.

**NOTICE OF SETTLEMENT:** Please also be advised that the plaintiffs Camelot Event Driven Fund, A Series of Frank Funds Trust (“Camelot”) and Municipal Police Employees’ Retirement System (“MPERS”; and together with Camelot, “Plaintiffs”), on behalf of themselves and the Class, have reached a proposed settlement of the Action for \$120,000,000 in cash that, if approved by the Court, will resolve all claims in the Action (the “Settlement”).

**PLEASE READ THIS NOTICE CAREFULLY. This Notice explains important rights you may have, including the possible receipt of cash from the Settlement. If you are a member of the Class, your legal rights will be affected whether or not you act.**

**If you have any questions about this Notice, the proposed Settlement, or your eligibility to participate in the Settlement, please DO NOT contact any Defendants in the Action, or their counsel. All questions should be directed to Class Counsel or the Claims Administrator (see ¶ 56 below).**

### WHY DID I GET THIS NOTICE?

1. This Notice is given pursuant to an order issued by the Supreme Court of the State of New York, County of New York (the “Court”). This Notice serves to inform you of the proposed Settlement of the Action and the hearing (the “Settlement Hearing”) to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement, as set forth in the Stipulation, by and between Plaintiffs, on behalf of themselves and the Class; and (b) Defendants Morgan Stanley & Co. LLC (“Morgan Stanley”), Goldman Sachs & Co. LLC (“Goldman Sachs”), and Wells Fargo Securities, LLC (“Wells Fargo”; and together with Morgan Stanley and Goldman Sachs, “Defendants”).

<sup>1</sup> The Stipulation and Agreement of Settlement (the “Stipulation”) dated March 27, 2025, can be viewed and/or downloaded at [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com). Any capitalized terms not otherwise defined in this Notice shall have the meanings given to them in the Stipulation.

2. This Notice is intended to inform you how this lawsuit and proposed Settlement may affect your rights and what steps you may take in relation to it. This Notice is NOT an expression of any opinion by the Court as to the merits of the claims asserted in the lawsuit or the defenses to those claims.

### WHAT IS THIS LAWSUIT ABOUT?

3. This is a securities class action against Defendants for claims under sections 11 and 12(a)(2) of the Securities Act of 1933 (the “Securities Act”). Plaintiffs claim that Defendants violated the Securities Act by disseminating offering materials for the Viacom Preferred Stock Initial Public Offering and Viacom Common Stock Secondary Public Offering (collectively, the “Offering Materials”) that contained false and misleading statements and omitted required disclosures. The alleged misstatements and omissions related to, among other things, certain of the underwriters’ holdings of, and intentions to sell, Viacom securities outside of the Offerings, in connection with their brokerage relationships with Archegos Capital Management, LP (“Archegos”). Defendants were underwriters for the Offerings.

4. On August 13, 2021, an initial class action complaint was filed by Camelot in the Court, styled *Camelot Event Driven Fund, A Series of Frank Funds Trust v. Morgan Stanley & Co. LLC, et al.*, Index No. 654959/2021, alleging violations of the Securities Act in connection with the Offerings.

5. On November 5, 2021, Plaintiffs Camelot and MPERS filed an amended class action complaint. On December 21, 2021, Plaintiffs filed the corrected amended class action complaint (the “Complaint”). The Complaint, like the initial complaint, alleges that the Offering Materials contained false and misleading statements and omitted required disclosures.<sup>2</sup>

6. On December 22, 2021, defendants filed motions to dismiss the Complaint. After briefing and oral argument, on February 7, 2023, the Court entered a Decision and Order granting the Motions to Dismiss of Viacom and the Individual Defendants and denying the Motions to Dismiss of the Underwriter Defendants (the “Motions to Dismiss Order”). On February 15, 2023, the Underwriter Defendants filed notices of appeal to the New York Supreme Court Appellate Division, First Department from the Motions to Dismiss Order. On March 10, 2023, Plaintiffs

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<sup>2</sup> The Complaint asserted claims against: (1) Defendants; (2) J.P. Morgan Securities LLC; Citigroup Global Markets Inc.; 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; BNY Mellon Capital Markets, LLC; Intesa Sanpaolo S.p.A.; and ICBC Standard Bank Plc. (the “Former Underwriter Defendants”; and together with Defendants, the “Underwriter Defendants”); (3) Viacom; and (4) 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 (the “Individual Defendants” or “Former Individual Defendants”). As used herein, the term Underwriter Defendants refers to the Defendants and the Former Underwriter Defendants.

filed a notice of appeal from the Motions to Dismiss Order in so far as it granted the Motions to Dismiss of Viacom and the Individual Defendants.

7. On April 17, 2023, the Underwriter Defendants filed Answers to the Complaint.
8. On April 18, 2023, Plaintiffs filed a motion to certify a class.
9. On June 1, 2023, Defendants filed motions seeking a stay of discovery pending their appeals from the Motions to Dismiss Order. On June 12, 2023, the Court entered a Decision and Order denying the motions to stay (the “Denial of Stay Order”). On June 27 and 30, 2023, Defendants filed notices of appeal from the Denial of Stay Order. On November 2, 2023, the First Department entered an Order affirming the Denial of Stay Order.
10. On January 4, 2024, after briefing and oral argument, the Court entered a Decision and Order granting Plaintiffs’ motion for class certification, appointing Plaintiffs as Class Representatives, and appointing Plaintiffs’ counsel Bernstein Litowitz Berger & Grossmann LLP and Glancy Prongay & Murray LLP as co-lead Class counsel (“Class Certification Order”). On February 14, 2024, Defendants filed a notice of appeal from the Class Certification Order. That appeal remains pending, but will be dismissed if the Settlement is approved by the Court.
11. On April 4, 2024, after briefing and oral argument, the First Department entered an Order in connection with the appeals from the Motions to Dismiss Order: (i) affirming the dismissal of Viacom and the Individual Defendants; (ii) affirming in part and reversing in part the non-dismissal of Morgan Stanley, Goldman Sachs, and Wells Fargo, and (iii) reversing the non-dismissal of the other Underwriter Defendants.
12. During discovery, Defendants and the Former Defendants produced over 1.5 million pages of documents to Plaintiffs. Plaintiffs also received over 270,000 pages of documents from 12 third parties in response to subpoenas. Plaintiffs produced over 22,000 pages documents to Defendants in response to their discovery requests.
13. The Parties also conducted 39 fact depositions. Class Counsel took 37 depositions. Class Counsel also took the deposition of the representative of one third party. Defendants deposed one representative from each of the Plaintiffs.
14. Plaintiffs filed several motions to compel discovery, four of which were pending at the time of the Parties’ agreement-in-principle to settle.
15. The Parties completed fact discovery on January 24, 2025 (subject to the four pending motions to compel), and then began expert discovery.
16. The Parties engaged the Hon. Layn R. Phillips, a former federal court judge, as a mediator. The Parties exchanged more than a dozen mediation briefs, plus *ex parte* submissions, and participated in three in-person mediation sessions with Judge Phillips. These sessions took place on November 7, 2024, January 6, 2025, and February 6, 2025. The sessions ended without an agreement being reached, however, Judge Phillips continued to work with the Parties. Following subsequent negotiations, Judge Phillips made a mediator’s recommendation to resolve the Action for \$120,000,000 for the benefit of the Class.
17. On February 24, 2025, the Parties accepted the mediator’s proposal, and on March 5, 2025, the Parties executed a settlement term sheet (the “Term Sheet”) memorializing their agreement-in-principle to settle the Action. The Term Sheet set forth, among other things, the Parties’ agreement to settle and release all claims against Defendants in return for a cash payment by or on behalf of Defendants of \$120 million for the benefit of the Class, subject to

Questions? Visit [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com) or call toll-free at 866-287-0741

certain terms and conditions and the execution of a customary “long form” stipulation and agreement of settlement and related papers.

18. After additional negotiations regarding the specific terms of their agreement, the Parties entered into the Stipulation on March 27, 2025. The Stipulation (together with the exhibits thereto) reflects the final and binding agreement between the Parties. The Stipulation can be viewed at the Settlement Website, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com).

19. On April 3, 2025, the Court preliminarily approved the Settlement, authorized this Notice to be disseminated to potential Class Members, and scheduled the Settlement Hearing to consider whether to grant final approval of the Settlement.

#### HOW DO I KNOW IF I AM A CLASS MEMBER?

20. If you are a member of the Class, you are subject to the Settlement, unless you timely request to be excluded. The Class consists of:

All persons and entities who purchased or otherwise acquired (i) the Class B Common Stock of Viacom issued in Viacom’s secondary public offering, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021; and/or (ii) Viacom’s 5.75% Series A Mandatory Convertible Preferred Stock issued in or traceable to Viacom’s initial public offering of that Preferred Stock, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021, and were damaged thereby.

Excluded from the Class are (i) Defendants, the Former Underwriter Defendants, the Officers, directors, and affiliates of Defendants and Former Underwriter Defendants at all relevant times, members of their Immediate Families, their legal representatives, heirs, successors or assigns, and any entity in which any Defendant or Former Underwriter Defendant has or had a controlling interest; (ii) Viacom, now known as Paramount Global, its Officers, directors, and affiliates at all relevant times, including the Former Individual Defendants, and members of their Immediate Families, their legal representatives, heirs, successors or assigns; and (iii) Archegos and the Officers, directors, and affiliates of Archegos at all relevant times, including Sung Kook “Bill” Hwang (“Hwang”), members of their Immediate Families, their legal representatives, heirs, successors or assigns, and any entity in which Hwang has or had a controlling interest. ***Also excluded from the Class are any persons and entities that submit a request for exclusion from the Class that is accepted by the Court.*** Notwithstanding anything to the contrary set forth in this provision, any Investment Vehicle shall not be excluded from the Class.

**PLEASE NOTE: Receipt of this Notice does not mean that you are a Class Member or that you will be entitled to a payment from the Settlement. If you are a Class Member and you wish to be eligible to receive a payment from the Settlement, you are required to submit the Claim Form that is being distributed with this Notice and the required supporting documentation as set forth in the Claim Form postmarked (if mailed), or online through [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com), no later than August 22, 2025.**

**WHAT IS THE MONETARY VALUE OF THE PROPOSED SETTLEMENT?**

21. Pursuant to the Settlement, Defendants have agreed to pay or caused to be paid a total of \$120,000,000 in cash (the “Settlement Amount”). The Settlement Amount will be deposited into an escrow account. The Settlement Amount plus any interest earned thereon is referred to as the “Settlement Fund.” If the Settlement is approved by the Court and the Effective Date occurs, the “Net Settlement Fund” (that is, the Settlement Fund less: (i) Court-awarded attorneys’ fees; (ii) Notice and Administration Costs; (iii) any required Taxes; (iv) Court-awarded Litigation Expenses; and (v) any other fees or expenses approved by the Court) will be distributed to Class Members who submit valid Claim Forms by the August 22, 2025 deadline, in accordance with the proposed Plan of Allocation or such other plan of allocation as the Court may approve.

22. The Net Settlement Fund will not be distributed unless and until the Court has approved the Settlement and a Plan of Allocation and that decision is affirmed on appeal (if any) and/or the time for any petition for rehearing, appeal, or review, whether by certiorari or otherwise, has expired.

23. The proposed Plan of Allocation for allocating the Net Settlement Fund among Authorized Claimants, which is subject to Court approval, appears in Appendix A to this Notice. At the Settlement Hearing, Class Counsel will request that the Court approve the Plan of Allocation. The Court may modify the Plan of Allocation, or approve a different plan of allocation, without further notice to the Class.

**DO I NEED TO CONTACT CLASS COUNSEL IN ORDER TO PARTICIPATE IN DISTRIBUTION OF THE SETTLEMENT FUND?**

24. No. If you have received this Notice and timely submit your Claim Form to the designated address, you need not contact Class Counsel. If your address changes, please contact the Claims Administrator at:

Viacom Archegos Securities Litigation

c/o JND Legal Administration

P.O. Box 91010

Seattle, WA 98111

Telephone: 866-287-0741

Email: [info@ViacomArchegosSecuritiesLitigation.com](mailto:info@ViacomArchegosSecuritiesLitigation.com)

Website: [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com)

**WHAT WILL HAPPEN IF THE SETTLEMENT IS TERMINATED?**

25. The Stipulation may be terminated under several circumstances outlined in the Stipulation. If the Stipulation is terminated, the Action will proceed as if the Stipulation had not been entered into.

**WHAT ARE THE REASONS FOR THE SETTLEMENT?**

26. Plaintiffs and Class Counsel believe that the claims asserted against Defendants have merit. They recognize, however, the expense and length of continued proceedings necessary to pursue their claims against Defendants as well as the very substantial risks they would face in establishing liability and damages. Such risks include the potential challenges associated with proving that there were material misstatements and omissions in the Offering Materials and establishing significant damages under the securities laws. Further, to obtain a recovery for the Class, Plaintiffs would have to prevail at several stages—through Defendants’ expected motion for summary judgment, and trial—and, even if they prevailed on those, on the appeals that were likely to follow. Thus, there were very significant risks related to the continued prosecution of the claims against Defendants.

27. In light of these risks, the amount of the Settlement, and the immediacy of recovery to the Class, Plaintiffs and Class Counsel believe that the proposed Settlement is fair, reasonable, and adequate, and in the best interests of the Class. Plaintiffs and Class Counsel believe that the Settlement provides a substantial benefit to the Class, namely \$120,000,000 in cash (less the various deductions described in this Notice), as compared to the risk that the claims in the Action would produce a smaller recovery, or no recovery, after summary judgment, trial, and appeals, possibly years in the future.

28. Defendants deny that they have committed any act or omission giving rise to liability in this Action. Defendants have agreed to the Settlement to eliminate the distraction, burden, time commitment, and expense of continued litigation. Accordingly, the Settlement may not be construed as an admission of any wrongdoing by Defendants.

**WHO REPRESENTS THE CLASS?**

29. The following attorneys are counsel for the Class:

Bernstein Litowitz Berger & Grossmann LLP  
Attn: John Rizio-Hamilton  
1251 Avenue of the Americas  
New York, NY 10020  
Email: settlements@blbglaw.com

-and-

Glancy Prongay & Murray LLP  
Attn: Daniella Quitt  
745 Fifth Avenue, 5th Floor  
New York, NY 10151  
Email: dquitt@glancylaw.com

30. If you have any questions about the Action, or the Settlement, you may consult with Class Counsel by writing to counsel at the address or email addresses listed above.

**HOW WILL THE PLAINTIFFS’ LAWYERS BE PAID?**

31. Class Counsel have not received any payment for their services in pursuing claims against the Defendants on behalf of the Class, nor have Class Counsel been reimbursed for their out-of-pocket expenses. Before final approval of the Settlement, Class Counsel will apply to the Court for an award of attorneys’ fees in an amount not to exceed one-third of the Settlement Fund. At the same time, Class Counsel also intend to apply for Litigation Expenses in an amount not to exceed \$2.3 million, which may include an application for reasonable costs and expenses incurred

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by Plaintiffs directly related to their representation of the Class. The Court will determine the amount of any award of attorneys' fees and/or Litigation Expenses. Such sums as may be approved by the Court will be paid from the Settlement Fund. ***Class Members are not personally liable for any such fees or expenses.***

32. The attorneys' fees and expenses requested will be the only payment to Class Counsel for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis. Class Counsel have agreed to share the attorneys' fees awarded on a 50-50 basis. The fees requested will compensate Class Counsel for their work in achieving the Settlement. The Court will decide what constitutes a reasonable fee award. Class Counsel have also advanced the costs of prosecuting this litigation and the firms will seek payment of such expenses from the Settlement Fund.

### CAN I EXCLUDE MYSELF FROM THE CLASS?

33. Yes. If you do not want to receive a payment from this Settlement, or you want to keep any right to sue that you may have or to continue to sue Defendants on your own about the legal issues in this case, then you must take steps to get out of the Class. This is called excluding yourself from, or "opting out" of the Class. If you are requesting exclusion because you want to bring your own lawsuit based on the matters alleged in this Action, you may want to consult an attorney and discuss whether any individual claim that you may wish to pursue would be time-barred by the applicable statutes of limitation or repose.

34. To exclude yourself from the Class, you must send a signed letter by mail saying that you want to be excluded from the Class. Your exclusion request must be mailed or delivered to the Claims Administrator at the address below such that it is ***received no later than July 15, 2025***:

Viacom Archegos Securities Litigation  
EXCLUSIONS  
c/o JND Legal Administration  
P.O. Box 91010  
Seattle, WA 98111

35. Each request for exclusion must: (i) clearly indicate the name, address, and telephone number of the person or entity seeking exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity "requests exclusion from the Class in *Camelot Event Driven Fund v. Morgan Stanley & Co. LLP, et al.*, Index No. 654959/2021 (Supreme Court of New York, New York County)"; (iii) state the number of shares of (a) Viacom Common Stock issued in the Viacom Common Stock Secondary Public Offering, and/or (b) Viacom Preferred Stock issued in or traceable to the Viacom Preferred Stock Initial Public Offering that the person or entity requesting exclusion purchased or otherwise acquired, as well as the dates and prices of each such purchase or acquisition and the dates and prices of any sales of those shares; and (iv) be signed by the person or entity requesting exclusion or an authorized representative. A request for exclusion that does not provide all the information called for in this paragraph and is not received by July 15, 2025 will be invalid and will not be allowed. Class Counsel may request that the person or entity requesting exclusion submit additional information or documentation sufficient to prove his, her, their, or its holdings and trading in Viacom Common Stock and Viacom Preferred Stock.

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36. You cannot exclude yourself by telephone or by email. If you make a proper request for exclusion (that is, the request meets the requirements in the paragraph immediately above), you will not receive a settlement payment, and you cannot object to the Settlement. If you make a proper request for exclusion, you will not be legally bound by anything that happens in this lawsuit. Also, you must follow the instructions in this Notice for requesting exclusion even if you have a pending lawsuit, or later file a lawsuit, arbitration, or other proceeding relating to any of the Released Plaintiffs' Claims (defined below) against Defendants or any of the other Defendants' Releasees (defined below).

**CAN I OBJECT TO THE SETTLEMENT, THE REQUESTED ATTORNEYS' FEES AND LITIGATION EXPENSES, AND/OR THE PLAN OF ALLOCATION?**

37. Yes. If you are a Class Member, you may object to the Settlement, the proposed Plan of Allocation or Class Counsel's motion for attorneys' fees and Litigation Expenses.

38. Objections must be in writing. You must file any written objection, together with copies of other papers and briefs supporting the objection, with the Clerk's Office at the Supreme Court of the State of New York for the County of New York at the address set forth below as well as provide copies to Class Counsel and Defendants' Counsel at the addresses set forth below so that the papers are *received no later than July 15, 2025*.

Clerk's Office	Class Counsel	Defendants' Counsel
Clerk of Court Supreme Court of New York County of New York 60 Centre Street New York, NY 10007	Bernstein Litowitz Berger & Grossmann LLP John Rizio-Hamilton 1251 Avenue of the Americas New York, NY 10020  Glancy Prongay & Murray LLP Daniella Quitt 745 Fifth Avenue, 5 <sup>th</sup> floor New York, NY 10151	Skadden Arps Meagher & Flom LLP Scott D. Musoff One Manhattan West New York, NY 10001  Sidley Austin LLP Matthew J. Dolan 1001 Page Mill Road, Bldg. 1 Palo Alto, CA 94304

39. Any objections, filings, and other submissions by the objecting Class Member must: (i) identify the case name and index number, *Camelot Event Driven Fund v. Morgan Stanley & Co. LLP, et al.*, Index No. 654959/2021 (Supreme Court of New York, New York County); (ii) state the name, address, and telephone number of the person or entity objecting, and if represented by counsel, the name, address, and telephone number of such counsel, and must be signed by the objector; (iii) state with specificity the grounds for the Class Member's objection, including any legal and evidentiary support the Class Member wishes to bring to the Court's attention; and (iv) include documents sufficient to prove membership in the Class, including documents showing the number of shares of (a) Viacom Common Stock issued in the Viacom Common Stock Secondary Public Offering, and/or (b) Viacom Preferred Stock issued in or traceable to the Viacom Preferred Stock Initial Public Offering that the person or entity objecting

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purchased or otherwise acquired, as well as the dates and prices of each such purchase or acquisition and the dates and prices of any sales of those shares. The objecting Class Member must provide documentation establishing membership in the Class through copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from the objector's broker containing the transactional and holding information found in a broker confirmation slip or account statement. Class Counsel may request that the objecting Class Member submit additional information or documentation sufficient to prove his, her, their, or its holdings and trading in Viacom Common Stock and Viacom Preferred Stock.

40. You may not object to the Settlement, Plan of Allocation, and/or Class Counsel's motion for an award of attorneys' fees and Litigation Expenses (including Plaintiffs' request for payment for their efforts in prosecuting this Action on behalf of the Class) if you exclude yourself from the Class or if you are not a member of the Class.

41. **Any Class Member who does not object in the manner described above will be deemed to have waived any objection and will be forever foreclosed from making any objection to the proposed Settlement, the proposed Plan of Allocation, or Class Counsel's motion for attorneys' fees and Litigation Expenses. Class Members do not need to appear at the Settlement Hearing or take any other action to indicate their approval.**

#### **WHAT IS THE DIFFERENCE BETWEEN OBJECTING AND EXCLUDING MYSELF FROM THE SETTLEMENT?**

42. Objecting is telling the Court that you do not like something about the proposed Settlement, the Plan of Allocation, or Class Counsel's request for an award of attorneys' fees and Litigation Expenses (including Plaintiffs' request for payment for their efforts in prosecuting this Action on behalf of the Class). You can object only if you stay in the Class. Excluding yourself is telling the Court that you do not want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer applies to you.

#### **WHAT ARE MY RIGHTS AND OBLIGATIONS UNDER THE SETTLEMENT?**

43. If you are a Class Member and you do not exclude yourself from the Class, you may receive the benefit of, and you will be bound by, the terms of the Settlement described in this Notice, upon approval by the Court.

#### **HOW CAN I GET A PAYMENT?**

44. To be eligible for a payment from the Settlement, you must be a member of the Class and you must timely complete and return the Claim Form with adequate supporting documentation **postmarked (if mailed), or submitted online using the Settlement Website, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com), no later than August 22, 2025.** A Claim Form is included with this Notice, or you may obtain one from the Settlement Website, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com). You may also request that a Claim Form be mailed to you by calling the Claims Administrator toll free at 866-287-0741, or by emailing the Claims Administrator at [info@ViacomArchegosSecuritiesLitigation.com](mailto:info@ViacomArchegosSecuritiesLitigation.com). Please retain all records of your ownership of, and transactions in Viacom Common Stock and Viacom Preferred Stock, as they will be needed to document your Claim. The Parties and Claims Administrator do

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not have information about your ownership of, or transactions in Viacom Common Stock and Preferred Stock.

45. If you request exclusion from the Class or do not submit a timely and valid Claim Form, you will not be eligible to share in the Net Settlement Fund.

46. Unless the Court otherwise orders, any Class Member who or which fails to submit a Claim Form postmarked (if mailed), or submitted online, **on or before August 22, 2025**, will be fully and forever barred from receiving payments pursuant to the Settlement, but will in all other respects remain a member of the Class and be subject to the provisions of the Stipulation, including the terms of any Judgment entered and the Releases given. This means that each Class Member releases the Released Plaintiffs' Claims (as defined in ¶ 47a below) against the Defendants' Releasees (as defined in ¶ 47b below) and will be barred and enjoined from prosecuting any of the Released Plaintiffs' Claims against any of the Defendants' Releasees whether or not such Class Member submits a Claim Form.

#### WHAT CLAIMS WILL BE RELEASED BY THE SETTLEMENT?

47. If you are a Class Member and you do not exclude yourself from the Class, you will be bound by any orders issued by the Court. If the Settlement is approved, the Court will enter a judgment (the "Judgment"). The Judgment will dismiss with prejudice the claims against Defendants and will provide that, upon the Effective Date of Settlement, Plaintiffs and each of the other Class Members, on behalf of themselves, and their respective heirs, executors, trustees, predecessors, successors, and assigns in their capacities as such, and on behalf of any other person or entity legally entitled to bring Released Plaintiffs' Claims on behalf of the respective Class Members in such capacity only, shall be deemed to have, and, by operation of the Judgment, shall have, fully, finally, and forever released, relinquished, discharged, waived, and dismissed each and every Released Plaintiffs' Claims (defined below) against Defendants and the other Defendants' Releasees (defined below), and shall forever be barred and enjoined from prosecuting, commencing, instituting, or maintaining, directly or indirectly, representatively, or in any other capacity, any or all of the Released Plaintiffs' Claims against any of the Defendants' Releasees.

a. "Released Plaintiffs' Claims" means all claims, demands, losses, rights, and causes of action of every nature and description, including known claims and Unknown Claims, whether legal, equitable, contractual, rescissory, statutory, or otherwise, and whether arising under federal, state, common, or foreign law, that are based upon, arise from, or relate to (i) the subject matter of the Complaint or any facts, actions, failures to act, statements, or omissions that were alleged, or that could have been alleged, in the Complaint; and (ii) the purchase, acquisition, holding, or trading of any (a) ViacomCBS Inc. Class B Common Stock issued in Viacom's secondary public offering, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021; and/or (b) Viacom's 5.75% Series A Mandatory Convertible Preferred stock issued in or traceable to Viacom's initial public offering of that Preferred Stock, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021. Released Plaintiffs' Claims do not cover, include, or release: (i) any claim relating to the enforcement of the Settlement; and (ii) any claims of any person or entity that submits a request for exclusion that is accepted by the Court.

b. “Defendants’ Releasees” means (i) Defendants; (ii) Former Underwriter Defendants; (iii) Viacom; (iv) direct or indirect parent entities, subsidiaries, related entities, and affiliates of Defendants, Former Underwriter Defendants, and Viacom; (v) for any of the entities listed in parts (i), (ii), (iii), and (iv), their respective past and present general partners, limited partners, principals, shareholders, joint venturers, officers, directors, managers, managing directors, supervisors, employees, contractors, consultants, experts, auditors, accountants, financial advisors, insurers, trustees, trustors, agents, attorneys, predecessors, successors, assigns, heirs, executors, administrators, and any controlling person thereof; and (vi) any entity in which a Defendant, Former Underwriter Defendant, or Viacom has a controlling interest; all in their capacities as such. For the avoidance of doubt, “affiliates” are persons or entities that directly, or indirectly through one or more intermediaries, control, are controlled by or are under common control with Viacom or one of the Defendants or Former Underwriter Defendants.

c. “Unknown Claims” means any Released Plaintiffs’ Claims which any Plaintiff or any other Class Member does not know or suspect to exist in his, her, or its favor at the time of the release of such claims, and any Released Defendants’ Claims which any Defendant does not know or suspect to exist in his, her, or its favor at the time of the release of such claims, which, if known by him, her or it, might have affected his, her or its decision(s) with respect to this Settlement. With respect to any and all Released Claims, the Parties stipulate and agree that, upon the Effective Date of the Settlement, Plaintiffs and Defendants shall expressly waive, and each of the other Class Members shall be deemed to have waived, and by operation of the Judgment or, if applicable, the Alternate Judgment, shall have expressly waived, any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law or foreign law, which is similar, comparable, or equivalent to California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

Plaintiffs and Defendants acknowledge, and each of the other releasing parties shall be deemed by operation of law to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement.

48. The Judgment will also provide that, upon the Effective Date of Settlement, each of the Defendants, on behalf of themselves, and their respective heirs, executors, trustees, predecessors, successors, and assigns in their capacities as such and any person or entity that can assert claims on their behalf, in such capacity only, shall be deemed to have, and by operation of law and of the Judgment shall have, fully, finally, and forever released, relinquished, discharged, waived, and dismissed each and every Released Defendants’ Claims against Plaintiffs and the other Plaintiffs’ Releasees, and shall forever be barred and enjoined from prosecuting, commencing, instituting, or maintaining, directly or indirectly, representatively, or in any other capacity, any or all of the Released Defendants’ Claims against the Plaintiffs’ Releasees.

a. “Released Defendants’ Claims” means all claims and causes of action of every nature and description, whether known claims or Unknown Claims, whether arising under federal, state, common or foreign law, that arise out of or relate in any way to the institution, prosecution, or settlement of the claims asserted in the Action

against Defendants. Released Defendants' Claims do not cover, include, or release: (i) claims relating to the enforcement of the Settlement; or (ii) claims against any persons or entities who or which submit a request for exclusion from the Class that is accepted by the Court.

- b. "Plaintiffs' Releasees" means (i) Plaintiffs, all Class Members, and Class Counsel, and (ii) each of their respective Immediate Family members, and their respective partners, general partners, limited partners, principals, shareholders, joint venturers, members, officers, directors, managing directors, supervisors, employees, contractors, consultants, experts, auditors, accountants, financial advisors, insurers, trustees, trustors, agents, attorneys, predecessors, successors, assigns, heirs, executors, administrators, and any controlling person thereof; all in their capacities as such.

49. By order of the Court, pending final determination by the Court of whether the Settlement should be approved, all Class Members are barred and enjoined from instituting, continuing, commencing, maintaining, or prosecuting any action in any court or tribunal that asserts Released Plaintiffs' Claims against any of the Defendants' Releasees.

**WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE  
THE SETTLEMENT? DO I HAVE TO COME TO THE HEARING?  
MAY I SPEAK AT THE HEARING IF I DON'T LIKE THE SETTLEMENT?**

50. The Settlement Hearing will be held on **August 5, 2025, at 10:00 a.m.**, before the Honorable Andrew Borrok of the Supreme Court of the State of New York, either in person at the New York County Courthouse, 60 Centre Street, Courtroom 238, New York, New York 10007 or by videoconference. At the Settlement Hearing the Court will, among other things: (i) determine whether the proposed Settlement is fair, reasonable, and adequate, and should be approved by the Court; (ii) determine whether the Judgment as provided under the Stipulation should be entered; (iii) determine whether the proposed Plan of Allocation for the distribution of the Net Settlement Fund should be approved by the Court as fair and reasonable; (iv) consider Class Counsel's application for an award of attorneys' fees and Litigation Expenses, including Plaintiffs' request for payment for their efforts in prosecuting this Action on behalf of the Class; and (v) consider any objections or opt outs received by the Court.

51. **Please Note:** The date and time of the Settlement Hearing may change without further written notice to the Class. The Court also reserves the right to hold the Settlement Hearing telephonically or by other virtual means, in which event the Claims Administrator will update its website regarding the Settlement Hearing's telephonic or virtual format. Accordingly, in order to determine whether the date, time and/or manner of the Settlement Hearing has changed, it is important that you monitor the Court's docket or the Settlement Website, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com).

52. Class Members do not need to attend the Settlement Hearing. The Court will consider any written objection even if a Class Member does not attend the Settlement Hearing. Also, you can participate in the Settlement without attending the Settlement Hearing. You may not, however, appear at the Settlement Hearing to present any objection unless you first file and serve a written objection in accordance with the procedures described in ¶¶ 38-39 above, unless the Court orders otherwise.

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53. If you wish to be heard orally at the Settlement Hearing, provided you timely file and serve a written objection as described above, you must also file a notice of appearance with the Clerk's Office and send copies of it to Class Counsel and to Defendants' Counsel at the addresses set forth in ¶ 38 above so that it is ***received on or before July 15, 2025***. Persons who intend to object and desire to present evidence at the Settlement Hearing must include in their written objection the identity of any witnesses they may call to testify and exhibits they intend to introduce into evidence at the hearing. Objectors who intend to appear at the Settlement Hearing through counsel must also identify that counsel by name, address, and telephone number. Objectors and/or their counsel may be heard orally at the discretion of the Court.

54. You are not required to hire an attorney to represent you in making written objections or in appearing at the Settlement Hearing. However, if you decide to hire an attorney, it will be at your own expense, and that attorney must file a notice of appearance with the Court and serve it on Class Counsel and Defendants' Counsel at the addresses set forth in ¶ 38 above so that the notice is ***received on or before July 15, 2025***.

#### HOW DO I OBTAIN ADDITIONAL INFORMATION?

55. This Notice contains only a summary of the terms of the Settlement. The records in this Action can be obtained by accessing the Court docket in this case through the New York State Unified Court System at <https://iapps.courts.state.ny.us/nyscef/CaseSearch> or, subject to customary copying fees, by visiting, during regular office hours, at the Clerk of the Supreme Court of New York, County of New York. In addition, the Stipulation, which contains the full terms and conditions of the Settlement, as well as copies of this Notice, the Claim Form, and any orders entered by the Court related to the Settlement will be posted on the website maintained by the Claims Administrator, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com).

56. All inquiries concerning this Notice and the Claim Form should be directed to the Claims Administrator or Class Counsel in writing at:

Viacom Archegos Securities Litigation  
c/o JND Legal Administration  
P.O. Box 91010  
Seattle, WA 98111  
Telephone: 866-287-0741  
[www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com)

and/or

Bernstein Litowitz Berger &  
Grossmann LLP  
John Rizio-Hamilton  
1251 Avenue of the Americas  
New York, NY 10020  
Email: [settlements@blbglaw.com](mailto:settlements@blbglaw.com)

and/or

Glancy Prongay & Murray LLP  
Daniella Quitt  
745 Fifth Avenue, 5<sup>th</sup> floor  
New York, NY 10151  
Email: [dquitt@glancylaw.com](mailto:dquitt@glancylaw.com)

**WHAT IF I BOUGHT SHARES ON SOMEONE ELSE'S BEHALF?**

57. If you purchased or otherwise acquired (for the beneficial interest of persons or organizations other than yourself):

- (a) Viacom Common Stock directly in the Viacom Common Stock Secondary Public Offering that was announced on March 22, 2021 and closed on March 26, 2021;
- (b) Viacom Preferred Stock directly in the Viacom Preferred Stock Initial Public Offering that was announced on March 22, 2021 and closed on March 26, 2021; and/or
- (c) Viacom Preferred Stock in the open market from March 24, 2021 through March 28, 2024;

you must, within seven (7) calendar days of receipt of the Notice, either: (a) request from the Claims Administrator sufficient copies of the Notice and Claim Form (the "Notice Packet") to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Notice Packets forward them to all such beneficial owners; (b) request the link of the Notice Packet to email all such beneficial owners and within seven (7) calendar days of receipt of the link forward them to all such beneficial owners; or (c) provide a list of the names, mailing addresses and email addresses (to the extent available) of all such beneficial owners to Viacom Archegos Securities Litigation, c/o JND Legal Administration, P.O. Box 91010, Seattle, WA 98111, in which event the Claims Administrator shall promptly mail the Notice Packet to such beneficial owners. Nominees shall also provide email addresses for all such beneficial owners to the Claims Administrator, to the extent they are available. If you choose to follow procedure (a) or (b), the Court has directed that, upon such mailing, you send a statement to the Claims Administrator confirming that the mailing or emailing was made as directed.

58. Upon full and timely compliance with these directions, nominees may seek reimbursement of their reasonable expenses actually incurred, not to exceed \$0.02 plus postage at the current pre-sort rate used by the Claims Administrator per Notice Packet mailed; \$0.02 per emailed Notice Packet link; or \$0.02 per name, address, and email address (to the extent available) provided to the Claims Administrator, by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought. **YOU ARE NOT AUTHORIZED TO PRINT THE NOTICE PACKET YOURSELF. NOTICE PACKETS MAY ONLY BE PRINTED BY THE COURT-APPOINTED CLAIMS ADMINISTRATOR.**

**DO NOT WRITE TO OR TELEPHONE THE COURT FOR INFORMATION.**

DATED: April 24, 2025

BY ORDER OF THE SUPREME COURT OF  
NEW YORK, COUNTY OF NEW YORK  
THE HONORABLE ANDREW BORROK, J.S.C.



## APPENDIX A

**PROPOSED PLAN OF ALLOCATION OF THE NET SETTLEMENT FUND**

59. The Plan of Allocation set forth herein is the plan that is being proposed by Plaintiffs to the Court for approval after consultation with their damages expert. The Court may approve the Plan of Allocation with or without modification, or approve another plan of allocation, without further notice to the Class. Any Orders regarding a modification to the Plan of Allocation will be posted on the Settlement website, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com). Defendants have had, and will have, no involvement or responsibility for the terms or application of the Plan of Allocation.

60. The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund among those Class Members who suffered economic losses as a result of the alleged violations of the Securities Act with respect to purchases or acquisitions of (a) shares of publicly traded Viacom Class B Common Stock (“Viacom Common Stock”) issued in Viacom’s secondary public offering of Viacom Common Stock announced on March 22, 2021 (the “Common Offering”), and/or (b) shares of Viacom’s 5.75% Series A Mandatory Convertible Preferred Stock (“Viacom Preferred Stock”) issued in or traceable to Viacom’s initial public offering of Viacom Preferred Stock announced on March 22, 2021 (the “Preferred Offering”). The Common Offering and Preferred Offering are collectively referred to as the “Offerings.” Viacom Common Stock and Viacom Preferred Stock are collectively referred to as “Viacom Shares.”

61. The Offerings were both announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021. All shares of Viacom Common Stock purchased directly in the Common Offering at the \$85.00 per share issue price are potentially eligible for recovery under the Plan of Allocation. For shares of Viacom Common Stock purchased in the open market from March 23, 2021 through the close of trading on March 29, 2021, only Claimants who can establish through documentation that the specific shares that the Claimant purchased were issued in the Common Offering will be potentially eligible for recovery under the Plan of Allocation. *See* Claim Form, General Instructions ¶ 6. All shares of Viacom Preferred Stock either purchased directly in the Preferred Offering at the \$100.00 per share issue price or purchased in the open market through the close of trading on March 29, 2021 are potentially eligible for recovery under the Plan of Allocation. All Viacom Shares purchased after the close of trading on March 29, 2021 are not eligible for recovery.

62. Calculations made pursuant to the Plan of Allocation do not represent a formal damages analysis that has been adjudicated in the Action and are not intended to measure the amounts that Class Members would recover after a trial. Nor are these calculations intended to be estimates of the amounts that will be paid to Authorized Claimants pursuant to the Settlement. The computations under the Plan of Allocation are only a method to weigh the claims of Authorized Claimants against one another for the purposes of making a *pro rata* allocation of the Net Settlement Fund.

63. The Net Settlement Fund will be allocated between the Common Stock Claim Fund and Preferred Stock Claim Fund based on the relative amounts of the estimated damages suffered by the two types of Viacom Shares.

- (a) The Common Stock Claim Fund will be allocated \$75 million, less a proportional amount of the total Court-approved attorneys' fees, Litigation Expenses, Taxes, and Notice and Administration Costs for the Settlement.
- (b) The Preferred Stock Claim Fund will be allocated \$45 million, less a proportional amount of the total Court-approved attorneys' fees, Litigation Expenses, Taxes, and Notice and Administration Costs for the Settlement.

64. The formulas used in the Plan of Allocation, which were developed by Lead Plaintiffs' damages expert, are based on the greater of the statutory measure for calculation of damages for claims under Section 11 of the Securities Act, as set forth at Section 11(e), 15 U.S.C. § 77k(e), and the rescission measure of damages available for claims under Section 12(a)(2) of the Securities Act, 15 U.S.C. § 77l(a)(2).

#### **CALCULATION OF RECOGNIZED LOSS AMOUNTS** **FOR VIACOM COMMON STOCK**

65. For each share of Viacom Common Stock either (a) purchased directly in the Common Offering at the \$85.00 per share issue price or (b) purchased from March 24, 2021 through the close of business on March 29, 2021 and for which the Claimant can provide documentation showing that specific shares of Viacom Common Stock that the Claimant purchased were issued in the Common Offering, and:

- (i) sold before March 4, 2025, the **Common Stock Recognized Loss Amount** is the purchase price per share (not to exceed \$85.00) *minus* the sale price per share.
- (ii) held as of the close of trading on March 4, 2025, the **Common Stock Recognized Loss Amount** is the purchase price per share (not to exceed \$85.00) *minus* \$11.48, the closing price on March 4, 2025.

66. If the Common Stock Recognized Loss Amount for any purchase is negative it will be set to zero. Each Claimant shall have a "**Common Stock Recognized Claim**" which be the sum of the Claimant's Common Stock Recognized Loss Amounts for all eligible purchase of Viacom Common Stock.

#### **CALCULATION OF RECOGNIZED LOSS AMOUNTS** **FOR VIACOM PREFERRED STOCK**

67. For each share of Viacom Preferred Stock either (a) purchased directly in the Preferred Offering at the \$100.00 per share issue price, or (b) purchased in the open market through the close of business on March 29, 2021, and:

- (i) sold before the close of trading on March 28, 2024,<sup>3</sup> the **Preferred Stock Recognized Loss Amount** is the purchase price per share (not to exceed \$100.00) *minus* the sale price per share.

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<sup>3</sup> The shares of Viacom Preferred Stock were converted into Viacom Common Stock on April 1, 2024. March 28, 2024 is the final trading day before that conversion.

- (ii) held as of the close of trading on March 28, 2024, the **Preferred Stock Recognized Loss Amount** is the purchase price per share (not to exceed \$100.00) *minus* \$13.74, the closing price of the Preferred Stock on March 28, 2024.

68. If the Preferred Stock Recognized Loss Amount for any purchase is negative it will be set to zero. Each Claimant shall have a “**Preferred Stock Recognized Claim**” which be the sum of the Claimant’s Preferred Stock Recognized Loss Amounts for all eligible purchase of Viacom Preferred Stock.

### **ADDITIONAL PROVISIONS**

69. **LIFO Matching:** If a Class Member has more than one purchase/acquisition or sale of Viacom Common Stock or Viacom Preferred Stock, all purchases/acquisitions and sales of the same security shall be matched on a Last In, First Out (“LIFO”) basis. Sales will be matched first against the most recent prior purchases/acquisitions of the same security in reverse chronological order.

70. **“Purchase/Sale” Prices:** For the purposes of calculations under this Plan of Allocation, “purchase price” means the actual price paid, excluding any fees, commissions, and taxes, and “sale price” means the actual amount received, not deducting any fees, commissions, and taxes.

71. **“Purchase/Sale” Dates:** Purchases, acquisitions, and sales of Viacom Shares will be deemed to have occurred on the “contract” or “trade” date as opposed to the “settlement” or “payment” date. However, the receipt or grant by gift, inheritance, or operation of law of Viacom Shares shall not be deemed an eligible purchase, acquisition, or sale for the calculation of a Claimant’s Recognized Loss Amounts, nor shall the receipt or grant be deemed an assignment of any claim relating to the stock unless (i) the donor or decedent had an eligible purchase of the Viacom Shares; (ii) the instrument of gift or assignment specifically provides that it is intended to transfer such rights; and (iii) no Claim was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to those shares.

72. **Short Sales:** The date of covering a “short sale” is deemed to be the date of purchase of the Viacom Shares. The date of a “short sale” is deemed to be the date of sale of the Viacom Shares. In accordance with the Plan of Allocation, however, the Recognized Loss Amount on “short sales” is zero.

73. **Shares Purchased/Sold Through the Exercise of Options:** Option contracts to purchase or sell Viacom Shares also are not securities eligible to participate in the Settlement. With respect to Viacom Shares purchased or sold through the exercise of an option, the purchase/sale date of the Viacom Shares is the exercise date of the option and the purchase/sale price is the exercise price of the option.

74. **Determination of Distribution Amount:** The Common Stock Claim Fund will be distributed on a *pro rata* basis to Authorized Claimants based on their Common Stock Recognized Claims and the Preferred Stock Claim Fund will be distributed on a *pro rata* basis to Authorized Claimants based on their Preferred Stock Recognized Claims. Specifically, a “**Distribution Amount**” will be calculated for each Authorized Claimant, which will be (a) the Authorized Claimant’s Common Stock Recognized Claim divided by the total Common Stock Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Common Stock Claim Fund, *plus* (b) the Authorized Claimant’s Preferred Stock Recognized Claim divided by the total

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Preferred Stock Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Preferred Stock Claim Fund.

75. The Net Settlement Fund will be allocated among all Authorized Claimants whose Distribution Amount is \$10.00 or greater. If any Authorized Claimant's Distribution Amount calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant. Those funds will be included in the payments to Authorized Claimants with Distribution Amounts over \$10.00.

76. After the initial distribution of the Net Settlement Fund, the Claims Administrator will make reasonable and diligent efforts to have Authorized Claimants cash their distribution checks. To the extent any monies remain in the Net Settlement Fund after the initial distribution, if Class Counsel, in consultation with the Claims Administrator, determine that it is cost-effective to do so, the Claims Administrator, no less than seven (7) months after the initial distribution, will conduct a re-distribution of the funds remaining after payment of any unpaid fees and expenses incurred in administering the Settlement, including for such re-distribution, to Authorized Claimants who have cashed their initial distributions and who would receive at least \$10.00 from such re-distribution. Additional re-distributions to Authorized Claimants who have cashed their prior checks and who would receive at least \$10.00 on such additional re-distributions may occur thereafter if Class Counsel, in consultation with the Claims Administrator, determine that additional re-distributions, after the deduction of any additional fees and expenses incurred in administering the Settlement, including for such re-distributions, would be cost-effective. At such time as it is determined that the re-distribution of funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance will be contributed to non-sectarian, not-for-profit, 501(c)(3) organization(s), to be recommended by Class Counsel and approved by the Court.

77. Payment pursuant to the Plan of Allocation, or such other plan of allocation as may be approved by the Court, will be conclusive against all Claimants. No person or entity shall have any claim against Plaintiffs, Class Counsel, the Claims Administrator, or any other agent designated by Class Counsel, or Defendants' Releasees and/or their respective counsel, arising from distributions made substantially in accordance with the Stipulation, the plan of allocation approved by the Court, or any order of the Court. Plaintiffs and Defendants, and their respective counsel, and all other Releasees shall have no liability whatsoever for the investment or distribution of the Settlement Fund or the Net Settlement Fund, the plan of allocation approved by the Court, or the determination, administration, calculation, or payment of any claim or nonperformance of the Claims Administrator, the payment or withholding of Taxes (including interest and penalties) owed by the Settlement Fund, or any losses incurred in connection therewith.

# PROOF OF CLAIM AND RELEASE FORM

Viacom Archegos Securities Litigation  
c/o JND Legal Administration  
P.O. Box 91010  
Seattle, WA 98111

Toll-Free Telephone Number: 866-287-0741  
Email: [info@ViacomArchegosSecuritiesLitigation.com](mailto:info@ViacomArchegosSecuritiesLitigation.com)  
Website: [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com)

To be eligible to receive a share of the Net Settlement Fund in connection with the proposed Settlement, you must complete and sign this Proof of Claim and Release Form ("Claim Form") and mail it by first-class mail to the above address **postmarked (or received) no later than August 22, 2025**, or submit it online at [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com) **no later than August 22, 2025**.

Failure to submit your Claim Form by the date specified will subject your Claim to rejection and may preclude you from being eligible to recover any money in connection with the proposed Settlement.

**Do not mail or deliver your Claim Form to the Court, the Parties to the Action, or their counsel. Submit your Claim Form only to the Claims Administrator at the address set forth above, or online at [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com).**

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# PART I – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Notice") that accompanies this Claim Form, including the proposed Plan of Allocation set forth in Appendix A to the Notice (the "Plan of Allocation"). The Notice describes the proposed Settlement, how Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement and Plan of Allocation are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

2. This Claim Form is directed to all persons and entities who are members of the Class defined in paragraph 20 of the Notice. By submitting this Claim Form, you are making a request to share in the proceeds of the Settlement described in the Notice. **IF YOU ARE NOT A CLASS MEMBER (see definition of the Class contained in paragraph 20 of the Notice), OR IF YOU SUBMITTED A REQUEST FOR EXCLUSION FROM THE CLASS, DO NOT SUBMIT A CLAIM FORM AS YOU MAY NOT, DIRECTLY OR INDIRECTLY, PARTICIPATE IN THE SETTLEMENT. THUS, IF YOU ARE EXCLUDED FROM THE CLASS, ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**

3. **Submission of this Claim Form does not guarantee that you will share in the proceeds of the Settlement. The distribution of the Net Settlement Fund will be governed by the Plan of Allocation set forth in Appendix A to the Notice, if it is approved by the Court, or by such other plan of allocation as the Court approves.**

4. Use the Schedules of Transactions in Parts III - IV of this Claim Form to supply all required details of your transaction(s) in, and holdings of, shares of, respectively, Viacom Class B Common Stock and/or Viacom 5.75% Series A Mandatory Convertible Preferred Stock. On these schedules, please provide all the requested information with respect to your holdings, purchases, acquisitions, and sales of the applicable Viacom shares, whether such transactions resulted in a profit or a loss. **Failure to report all transaction and holding information during the requested time periods may result in the rejection of your Claim.**

5. You are required to submit genuine and sufficient documentation for all your transactions in, and holdings of Viacom shares set forth in the Schedules of Transactions in Parts III - IV of this Claim Form. Documentation may consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from your broker containing the transactional and holding information found in a broker confirmation slip or account statement. The Parties and the Claims Administrator do not independently have information about your investments in Viacom. **IF SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN COPIES OF THE DOCUMENTS OR EQUIVALENT DOCUMENTS FROM YOUR BROKER. FAILURE TO SUPPLY THIS DOCUMENTATION MAY RESULT IN THE REJECTION OF YOUR CLAIM. DO NOT SEND ORIGINAL DOCUMENTS. Please keep a copy of all documents that you send to the Claims Administrator. Also, do not highlight any portion of the Claim Form or any supporting documents.**

6. **Purchases of Shares of Viacom Class B Common Stock "Issued In" the March 2021 Secondary Public Offering.** A secondary public offering of Viacom Class B Common Stock was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021

(the "Common Offering"). Only investors who purchased shares "issued in" the Common Offering are eligible for recovery under the Settlement. If you purchased shares directly in the Common Offering at the offering price of \$85 per share, then you purchased shares "issued in" the Common Offering. If you purchased shares of Viacom Common Stock from March 24, 2021 through March 29, 2021 that were not purchased directly in the Common Offering, but that you believe are specifically traceable to the Common Offering, you must submit documents with your Claim Form showing that the specific shares that you purchased were issued in the Common Offering.

7. All joint beneficial owners each must sign this Claim Form and their names must appear as "Claimants" in Part II of this Claim Form. The complete name(s) of the beneficial owner(s) must be entered. If you held Viacom shares in your name, you are the beneficial owner as well as the record owner. If you held Viacom shares and the shares were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial owner of these shares, but the third party is the record owner. The beneficial owner, not the record owner, must sign this Claim Form.

8. **One Claim should be submitted for each separate legal entity or separately managed account.** Separate Claim Forms should be submitted for each separate legal entity (e.g., an individual should not combine his or her IRA transactions with transactions made solely in the individual's name). Generally, a single Claim Form should be submitted on behalf of one legal entity including all holdings and transactions made by that entity on one Claim Form. However, if a single person or legal entity had multiple accounts that were separately managed, separate Claims may be submitted for each such account. The Claims Administrator reserves the right to request information on all the holdings of, and transactions in Viacom shares made on behalf of a single beneficial owner.

9. Agents, executors, guardians, and trustees must complete and sign the Claim Form on behalf of persons represented by them, and they must:

- (a) expressly state the capacity in which they are acting;
- (b) identify the name, account number, last four digits of the Social Security Number (or Taxpayer Identification Number), address, and telephone number of the beneficial owner of (or other person or entity on whose behalf they are acting with respect to) Viacom shares; and
- (c) furnish herewith evidence of their authority to bind to the Claim Form the person or entity on whose behalf they are acting. (Authority to complete and sign a Claim Form cannot be established by stockbrokers demonstrating only that they have discretionary authority to trade securities in another person's accounts.)

10. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your Claim and may subject you to civil liability or criminal prosecution.

11. If the Court approves the Settlement, payments to eligible Authorized Claimants pursuant to the Plan of Allocation (or such other plan of allocation as the Court approves) will be made after any appeals are resolved, and after the completion of all claims processing. The claims process will take substantial time to complete fully and fairly. Please be patient.

12. **PLEASE NOTE:** As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her, or its *pro rata* share of the Net Settlement Fund. If the prorated payment to any Authorized Claimant calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

13. If you have questions concerning the Claim Form or need additional copies of the Claim Form or a copy of the Notice, you may contact the Claims Administrator, JND Legal Administration, at the above address, by email at [info@ViacomArchegosSecuritiesLitigation.com](mailto:info@ViacomArchegosSecuritiesLitigation.com), or by toll-free phone at 866-287-0741, or you can visit the website for the Settlement maintained by the Claims Administrator, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com), where copies of the Claim Form and Notice are available for downloading.

14. **NOTICE REGARDING ELECTRONIC FILES:** Certain Claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. To obtain the **mandatory** electronic filing requirements and file layout, you may visit the website for the Settlement, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com), or you may email the Claims Administrator's electronic filing department at [VIASecurities@jndla.com](mailto:VIASecurities@jndla.com). **Any file that is not submitted in accordance with the required electronic filing format will be subject to rejection.** No electronic files will be considered to have been properly submitted unless the Claims Administrator issues an email to you to that effect. **Do not assume that your file has been received until you receive this email. If you do not receive such an email within ten (10) days of your submission, you should contact the Claims Administrator's electronic filing department at [VIASecurities@jndla.com](mailto:VIASecurities@jndla.com) to inquire about your file and confirm it was received.**

**IMPORTANT PLEASE NOTE:**

**YOUR CLAIM IS NOT DEEMED SUBMITTED UNTIL YOU RECEIVE AN ACKNOWLEDGEMENT POSTCARD. THE CLAIMS ADMINISTRATOR WILL ACKNOWLEDGE RECEIPT OF YOUR CLAIM FORM BY MAIL WITHIN SIXTY (60) DAYS. IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD WITHIN SIXTY (60) DAYS, CALL THE CLAIMS ADMINISTRATOR TOLL FREE AT 866-287-0741.**



## PART II – CLAIMANT IDENTIFICATION

Please complete this PART II in its entirety. The Claims Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Claims Administrator in writing at the address above.

Beneficial Owner's First Name

MI

Beneficial Owner's Last Name




Co-Beneficial Owner's First Name

MI

Co-Beneficial Owner's Last Name




Entity Name (if Beneficial Owner is not an individual)

Representative or Custodian Name (if different from Beneficial Owner(s) listed above)

Street Address 1

Street Address 2

City

State

Zip Code




Country

Social Security Number (Last 4 digits)

OR

Taxpayer Identification Number (Last 4 digits)

Telephone Number (mobile/home)

Telephone Number (work)

Email Address (email address is not required, but if you provide it, you authorize the Claims Administrator to use it in providing you with information relevant to this Claim.)

Account Number (where securities were traded)<sup>1</sup>

☐ Individual (includes joint owner accounts)

☐ Corporation

☐ Pension Plan

☐ IRA/401k

☐ Estate

☐ Trust

☐ Other (please specify): \_\_\_\_\_

<sup>1</sup> If the account number is unknown, you may leave blank. If filing for more than one account for the same legal entity you may write "multiple." Please see paragraph 8 of the General Instructions above for more information on when to file separate Claim Forms for multiple accounts.

# PART III – SCHEDULE OF TRANSACTIONS IN VIACOM CLASS B COMMON STOCK

Complete this Part III by providing the requested information regarding your investments in Viacom Class B Common Stock (CUSIP 92556H206) ("Viacom Common Stock"). Please be sure to include proper supporting documentation with your Claim Form as described in detail in Part I – General Instructions, paragraph 5, above.

<b>1. SHARES OWNED PRIOR TO THE MARCH 2021 OFFERING</b> – State the number of shares of Viacom Common Stock held as of the close of trading on March 23, 2021. (Must be documented.) If none, write "zero" or "0."				<b>Confirm Proof of Holding Enclosed</b> <input type="checkbox"/>
<b>2. SHARES PURCHASED IN THE MARCH 2021 OFFERING</b> – State the number of shares of Viacom Common Stock purchased in the secondary public offering of that stock which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021, at the offering price of \$85.00 per share. (Must be documented.) If none, write "zero" or "0."				<b>Confirm Proof of Purchase Enclosed</b> <input type="checkbox"/>
<b>3. PURCHASES/ACQUISITIONS FROM MARCH 24, 2021 THROUGH MARCH 4, 2025</b> – Separately list each purchase/acquisition (including free receipts) of shares of Viacom Common Stock after the opening of trading on March 24, 2021 through the close of trading on March 4, 2025. (Must be documented.)				<b>IF NONE, CHECK HERE</b> <input type="checkbox"/>
Date of Purchase/ Acquisition (List Chronologically) (Month/Day/Year)	Number of Shares Purchased/Acquired	Purchase/Acquisition Price Per Share	Total Purchase/ Acquisition Price (excluding fees, commissions, and taxes)	Confirm Proof of Purchase/Acquisition Enclosed
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
<b>4. SALES FROM MARCH 24, 2021 THROUGH MARCH 4, 2025</b> – Separately list each sale/disposition (including free deliveries) of shares of Viacom Common Stock after the opening of trading on March 24, 2021 through the close of trading on March 4, 2025. (Must be documented.)				<b>IF NONE, CHECK HERE</b> <input type="checkbox"/>
Date of Sale (List Chronologically) (Month/Day/Year)	Number of Shares Sold	Sale Price Per Share	Total Sale Price (not deducting fees, commissions, and taxes)	Confirm Proof of Sale Enclosed
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
<b>5. HOLDINGS AS OF MARCH 4, 2025</b> – State the total number of shares of Viacom Common Stock held as of the close of trading on March 4, 2025. (Must be documented.) If none, write "zero" or "0."				<b>Confirm Proof of Holding Enclosed</b> <input type="checkbox"/>
<b>IF YOU REQUIRE ADDITIONAL SPACE FOR THE SCHEDULE ABOVE, ATTACH EXTRA SCHEDULES IN THE SAME FORMAT. PRINT THE BENEFICIAL OWNER'S FULL NAME AND LAST FOUR DIGITS OF SOCIAL SECURITY/TAXPAYER IDENTIFICATION NUMBER ON EACH ADDITIONAL PAGE. IF YOU DO ATTACH EXTRA SCHEDULES, CHECK THIS BOX</b> <input type="checkbox"/>				

# PART IV – SCHEDULE OF TRANSACTIONS IN VIACOM 5.75% SERIES A MANDATORY CONVERTIBLE PREFERRED STOCK

Complete this Part IV by providing the requested information regarding your investments in the Viacom 5.75% Series A Mandatory Convertible Preferred Stock (CUSIP 92556H305) ("Viacom Preferred Stock"). Please be sure to include proper supporting documentation with your Claim Form as described in detail in Part I – General Instructions, paragraph 5, above.

<b>1. SHARES PURCHASED IN THE MARCH 2021 OFFERING</b> – State the number of shares of Viacom Preferred Stock purchased in the initial public offering of that preferred stock, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021, <b>at the offering price of \$100 per share.</b> (Must be documented.) If none, write "zero" or "0."				<b>Confirm Proof of Purchase Enclosed</b> <input type="checkbox"/>
<b>2. PURCHASES/ACQUISITIONS FROM MARCH 24, 2021 THOUGH CONVERSION</b> – Separately list each purchase/acquisition (including free receipts) of shares of Viacom Preferred Stock from the offering through the close of trading on March 28, 2024. (Must be documented.)				<b>IF NONE, CHECK HERE</b> <input type="checkbox"/>
Date of Purchase/ Acquisition (List Chronologically) (Month/Day/Year)	Number of Shares Purchased/Acquired	Purchase/Acquisition Price Per Share	Total Purchase/ Acquisition Price (excluding fees, commissions, and taxes)	Confirm Proof of Purchase/Acquisition Enclosed
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
<b>3. SALES FROM MARCH 24, 2021 THROUGH CONVERSION</b> – Separately list each sale/disposition of shares of Viacom Preferred Stock from the opening of trading on March 24, 2021 through the close of trading on March 28, 2024. (Must be documented.)				<b>IF NONE, CHECK HERE</b> <input type="checkbox"/>
Date of Sale (List Chronologically) (Month/Day/Year)	Number of Shares Sold	Sale Price Per Share	Total Sale Price (not deducting fees, commissions, and taxes)	Confirm Proof of Sale Enclosed
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
/ /		\$	\$	<input type="checkbox"/>
<b>4. HOLDINGS THROUGH CONVERSION</b> – State the total number of shares Viacom Preferred Stock held as of the close of trading on March 28, 2024. If none, write "zero" or "0."				<b>Confirm Proof of Holding Enclosed</b> <input type="checkbox"/>
<b>IF YOU REQUIRE ADDITIONAL SPACE FOR THE SCHEDULE ABOVE, ATTACH EXTRA SCHEDULES IN THE SAME FORMAT. PRINT THE BENEFICIAL OWNER'S FULL NAME AND LAST FOUR DIGITS OF SOCIAL SECURITY/TAXPAYER IDENTIFICATION NUMBER ON EACH ADDITIONAL PAGE. IF YOU DO ATTACH EXTRA SCHEDULES, CHECK THIS BOX</b> <input type="checkbox"/>				

## PART V – RELEASE OF CLAIMS AND SIGNATURE

### YOU MUST ALSO READ THE RELEASE AND CERTIFICATION BELOW AND SIGN ON PAGE 9 OF THIS CLAIM FORM.

I (we) hereby acknowledge that, pursuant to the terms set forth in the Stipulation, without further action by anyone, upon the Effective Date of Settlement, I (we): (a) shall be deemed to have, and, by operation of the Judgment, shall have, fully, finally, and forever released, relinquished, discharged, waived, and dismissed each and every Released Plaintiffs' Claim against Defendants and the other Defendants' Releasees; and (b) shall forever be barred and enjoined from prosecuting, commencing, instituting, or maintaining, directly or indirectly, representatively, or in any other capacity, any or all of the Released Plaintiffs' Claims against any of the Defendants' Releasees.

### CERTIFICATION

By signing and submitting this Claim Form, the Claimant(s) or the person(s) who represent(s) the Claimant(s) agree(s) to the release above and certifies (certify) as follows:

1. that I (we) have read and understand the contents of the Notice and this Claim Form, including the Releases provided for in the Settlement and the terms of the Plan of Allocation;
2. that the Claimant(s) is a (are) member(s) of the Class, as defined in the Notice, and is (are) not excluded by definition from the Class as set forth in the Notice;
3. that the Claimant(s) has (have) **not** submitted a request for exclusion from the Class;
4. that I (we) own(ed) the Viacom shares identified in the Claim Form and have not assigned the Claim against Defendants or any of the other Defendants' Releasees to another, or that, in signing and submitting this Claim Form, I (we) have the authority to act on behalf of the owner(s) thereof;
5. that the Claimant(s) has (have) not submitted any other Claim covering the same transactions in, or holdings of the Viacom shares and knows (know) of no other person having done so on the Claimant's (Claimants') behalf;
6. that the Claimant(s) submit(s) to the jurisdiction of the Court with respect to Claimant's (Claimants') Claim and for purposes of enforcing the Releases set forth herein;
7. that I (we) agree to furnish such additional information with respect to this Claim Form as Class Counsel, the Claims Administrator, or the Court may require;
8. that the Claimant(s) waive(s) the right to trial by jury, to the extent it exists, agree(s) to the determination by the Court of the validity or amount of this Claim, and waives any right of appeal or review with respect to such determination;
9. that I (we) acknowledge that the Claimant(s) will be bound by and subject to the terms of any order(s), judgment(s), and the Judgment that may be entered in the Action; and

10. that the Claimant(s) is (are) NOT subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code because (a) the Claimant(s) is (are) exempt from backup withholding or (b) the Claimant(s) has (have) not been notified by the IRS that he/she/it/they is (are) subject to backup withholding as a result of a failure to report all interest or dividends or (c) the IRS has notified the Claimant(s) that he/she/it/they is (are) no longer subject to backup withholding. **If the IRS has notified the Claimant(s) that he/she/it/they is (are) subject to backup withholding, please strike out the language in the preceding sentence indicating that the Claim is not subject to backup withholding in the certification above.**

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

---

Signature of Claimant

Date

---

Print Name of Claimant here

---

Signature of Joint Claimant, if any

Date

---

Print Name of Claimant here

***If the Claimant is other than an individual, or is not the person completing this form, the following also must be provided:***

---

Signature of person signing on behalf of Claimant

Date

---

Print Name of person signing on behalf of Claimant here

---

Capacity of person signing on behalf of Claimant, if other than an individual, e.g., executor, president, trustee, custodian, etc. (Must provide evidence of authority to act on behalf of Claimant – see paragraph 9 on page 3 of this Claim Form.)

# REMINDER CHECKLIST



1. Sign the above release and certification. If this Claim Form is being made on behalf of joint Claimants, then both must sign.

2. Attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.



3. Do not highlight any portion of the Claim Form or any supporting documents.

4. Keep copies of the completed Claim Form and any supporting documentation for your own records.



5. The Claims Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your Claim is not deemed submitted until you receive an acknowledgement postcard. **If you do not receive an acknowledgement postcard within 60 days, please call the Claims Administrator toll-free at 866-287-0741.**

6. If your address changes in the future, you must send the Claims Administrator written notification of your new address. If you change your name, inform the Claims Administrator.



7. If you have any questions or concerns regarding your Claim, please contact the Claims Administrator at the address below, by email at [info@ViacomArchegosSecuritiesLitigation.com](mailto:info@ViacomArchegosSecuritiesLitigation.com), or by toll-free phone at 866-287-0741, or you may visit [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com). DO NOT call the Court, Defendants, or Defendants' Counsel with questions regarding your Claim.

THIS CLAIM FORM MUST BE MAILED TO THE CLAIMS ADMINISTRATOR BY FIRST-CLASS MAIL **POSTMARKED (OR RECEIVED) NO LATER THAN AUGUST 22, 2025**, OR SUBMITTED ONLINE AT [WWW.VIACOMARCHEGOSSECURITIESLITIGATION.COM](http://WWW.VIACOMARCHEGOSSECURITIESLITIGATION.COM) **NO LATER THAN AUGUST 22, 2025**. IF MAILED, THE CLAIM FORM SHOULD BE ADDRESSED AS FOLLOWS:

**Viacom Archegos Securities Litigation  
c/o JND Legal Administration  
P.O. Box 91010  
Seattle, WA 98111**

If mailed, a Claim Form received by the Claims Administrator shall be deemed to have been submitted when posted, if a postmark date on or before August 22, 2025 is indicated on the envelope and it is mailed First Class and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when received by the Claims Administrator.

You should be aware that it will take a significant amount of time to fully process all the Claim Forms. Please be patient and notify the Claims Administrator of any change of address.

# EXHIBIT B



BUSINESS & FINANCE

Hackers Said to Re-Emerge

Continued from page B1

and then move about within corporate networks. Then, they find ways to steal data or lock up workstations with special software, grinding corporate operations to a halt and demanding millions of dollars in extortion payments, according to security researchers.

They have also been known to take unusual steps once they have broken in. This includes posting offensive phrases and eggplant emojis in group discussions or even logging into incident-response meetings relating to their own hacks. They have made unusual demands related to business operations and even called family members of executives at companies they have hacked, researchers say.

In November, U.S. authorities announced the arrest of five hackers, whom researchers have linked to the Scattered Spider gang, saying they had been operating since at



A sign at MGM Resorts' Luxor in Las Vegas after a 2023 hack targeting the casino operator.

least 2022 and targeted at least 45 companies in the U.S., the U.K., Canada and India.

After those arrests, the group seemed to go silent, according to Google and other firms that investigate cyber intrusions.

Scattered Spider is proving more resilient than some investigators had imagined, Hultquist said. "Obviously what we're doing isn't working," he said. "It's gone on for far too long." Last week, Google sent out a note advis-

ing customers on how to protect themselves from Scattered Spider, according to a copy viewed by The Wall Street Journal.

On Sunday, the National Cyber Security Centre, part of the U.K.'s intelligence agency, said it was working with affected retailers and issued new guidance on how companies can protect themselves from attacks. The NCSC said it was trying to understand "if these attacks are linked, if this is a concerted campaign by a

single actor or whether there is no link between them at all."

A Harrods spokeswoman said on Monday that the company hadn't heard from the hackers in its cyber incident. Co-op said hackers stole a significant amount of data from the company, including customer names and contact information. As of Monday, Marks & Spencer has paused processing of online orders for 10 days because of a cyberattack, the company said.

Zuckerberg Foresees AI Friends

Continued from page B1

everyone will have an AI."

When someone is making a purchase and needs to speak to a person from that business, an AI agent will be there to help them, Zuckerberg said Tuesday.

The Tuesday talk capped a media blitz that included high-profile podcasts and public talks with fellow tech executives including Collison, Microsoft CEO Satya Nadella and Databricks CEO Ali Ghodsi. While the Meta CEO has been a guest on podcasts before, the number and quick succession of appearances was rare.

Zuckerberg has had mixed success predicting how people will interact with each other in the future. He struck gold with Facebook in the 2000s and made lucrative acquisitions with Instagram and WhatsApp a few years later. More than a decade later, in 2022, he declared that vast numbers of people in the fu-

ture would interact in virtual worlds and with augmented reality. That bet has yet to come to fruition.

The Meta CEO is now throwing resources at AI chatbots—both in its social-media apps and in its hardware devices. Meta AI, as it is called, is accessible via Instagram and Facebook, as a stand-alone app and on Meta's Ray-Ban smart glasses. Zuckerberg said Tuesday that nearly a billion people are using the feature monthly.

Zuckerberg said personalized AI isn't just about knowing basic information about a user, it is about ensuring chatbots behave as a good friend might.

"You have a deep understanding of what's going on in this person's life," he said on Thompson's podcast.

Some people, however, aren't buying into Zuckerberg's vision.

"The very platforms that have led to our social isolation and being chronically online are now posing a solution to the loneliness epidemic," said Meghana Dhar, a former Instagram executive who thinks AI friends will only make such problems worse. "It almost seems like the arsonist coming back and being the fireman."

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NOTICE OF SALE

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re: PROSPECT MEDICAL HOLDINGS, INC., et al., Chapter 11 Case No. 25-00002 (SGJ) Debtors. (Jointly Administered)

**NOTICE OF SALE HEARING**  
**PLEASE TAKE NOTICE OF THE FOLLOWING:**  
Beginning on January 11, 2025, the above-captioned debtors and debtors-in-possession (the "Debtors"), filed voluntary petitions for relief pursuant to chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas (the "Court").

On February 12, 2025, the Debtors filed a motion [Docket No. 500] (the "Sale Motion"), pursuant to sections 363 and 365 of the Bankruptcy Code and Rules 2002, 6004, and 6006 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), and Rule 6004-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of Texas, seeking entry of an order (the "Sale Order") approving the sale of the Debtor Purchased Assets to Astrana Health, Inc. and each of their successors and assigns (collectively, the "Buyer"), free and clear of all liens, claims, and encumbrances (such transaction, the "Transaction").

In the Wall Street Journal that ran on April 18, 2025, the Debtors published a notice indicating that a hearing (the "Sale Hearing") on the Sale Motion would take place on April 30, 2025 at 1:30 p.m. (prevailing Central Time).

The Sale Hearing has been rescheduled, and will now be held before the Honorable Stacey G. C. Jernigan, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Northern District of Texas, at Courtroom 1, 14th Floor, Eale Cabell Federal Building, 1100 Commerce Street, Dallas, Texas 75242-1496 on **May 21, 2025, at 1:30 p.m. (prevailing Central Time)**, or at such other time thereafter as counsel may be heard. The Sale Hearing may be further adjourned by the Debtors, from time to time without further notice to creditors or parties in interest other than by announcement of the adjournment in open court on the date scheduled for the Sale Hearing or by including such adjournment on any agenda filed with the Court or by the filing of a notice with the Court.

Objections to approval of the Transaction must be in writing, state the basis of such objection with specificity, and be filed with the Court and served before **11:59 p.m. (prevailing Central Time) on May 19, 2025** on the following parties: (a) counsel to the Debtors, Sidley Austin LLP, 787 7th Ave, New York, New York 10019 (Attn: Thomas R. Callano (tom.callano@sidley.com), William E. Curtin (wcurtin@sidley.com), Patrick Venter (pventer@sidley.com), Anne G. Wallace (anne.wallace@sidley.com) and Jonathan E. Mitnick (jmitnick@sidley.com); (b) the Office of the United States Trustee for the Northern District of Texas, 1100 Commerce Street, Room 916, Dallas, TX 75242 (Attn: Elizabeth Young (elizabeth.young@usdoj.gov)); (c) counsel to the Official Committee of Unsecured Creditors, Paul Hastings LLP, 200 Park Avenue, New York, NY 10166 (Attn: Kris Hansen (kris.hansen@paulhastings.com); Eric Galad (erezgalad@paulhastings.com); and Gabi Sasson (gabi.sasson@paulhastings.com); and (d) counsel to the Buyer, Latham & Watkins LLP, 355 S. Grand Avenue, Suite 100, Los Angeles, CA 90071 (Attn: Jeffrey E. Bjork (jeff.bjork@lw.com) and Ted A. Dillman (ted.dillman@lw.com)).

**UNLESS AN OBJECTION IS TIMELY SERVED AND FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED WITHOUT FURTHER HEARING AND NOTICE.**

This sale notice (this "Notice") is subject to the full terms and conditions of the Sale Motion and Order, with such Order controlling in the event of any conflict. The Debtors encourage all parties-in-interest to review such documents in their entirety. Parties interested in receiving more information regarding the sale of the Debtor Purchased Assets may make a written request (e-mail to be sufficient) to Houlihan Lapey Capital Inc. (Andrew Turnbull (ATurnbull@HL.com) and Daniel Martin (DMartin@HL.com)). Parties interested in receiving copies of any related document, including the Sale Motion, may make a written request (e-mail to be sufficient) to Omni Agent Solutions ("Omni"), the Debtors' claims and noticing agent, at ProspectInquiries@OmniAgent.com. In addition, copies of the Sale Motion and this Notice are on file with the Clerk of Court, 1100 Commerce Street, 125A, Dallas, Texas and are available on Omni's website free of charge at <https://omniagentsolutions.com/Prospect>.

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/Prospect>. The Debtors' mailing address is 3824 Hughes Ave., Culver City, CA 90232.

BANKRUPTCIES

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: MABVAX THERAPEUTICS HOLDINGS, INC., et al., Chapter 11 Case No. 19-10603 (LSS) Debtors. (Jointly Administered) Re: D.1.665

**NOTICE OF ENTRY OF BAR DATE ORDER FOR FILING PROOFS OF INTERESTS IN THE DEBTOR PLEASE TAKE NOTICE OF THE FOLLOWING:**  
**Entry of the Proof of Interest Bar Date Order.** On May 5, 2025, the United States Bankruptcy Court for the District of Delaware entered an order [Docket No. 665] (the "Bar Date Order") establishing the deadline for filing of proofs of interest in the chapter 11 case of Mabvax Therapeutics Holdings, Inc. (the "Debtor") and appointed Stretto, Inc. ("Stretto") as the Debtor's noticing agent.

**Proof of Interest Bar Date.** Each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, limited liability company, estate, trust, or governmental unit) holding or asserting an interest in the Debtor as of March 20, 2020 (the "Record Date") must file a proof of interest form so that it is actually received by Stretto on or before **July 7, 2025 at 5:00 p.m. (prevailing Eastern Time)** (the "Bar Date").

**ANY PERSON OR ENTITY WHO FAILS TO FILE A PROOF OF INTEREST ON OR BEFORE THE BAR DATE SHALL BE: (1) BARRED FROM RECEIVING ANY DISTRIBUTION IN THIS CHAPTER 11 CASE ON ACCOUNT OF THAT INTEREST AND (2) FOREVER BARRED FROM ASSERTING THAT INTEREST (OR FILING A PROOF OF INTEREST WITH RESPECT TO THAT INTEREST) AND THE POST-CONFIRMATION DEBTOR, ITS SUCCESSIONS AND THE PLAN ADMINISTRATOR WILL BE DISCHARGED FROM ANY AND ALL LIABILITY WITH RESPECT TO THAT INTEREST.**

**Contents of Proofs of Interest.** Subject to the Bar Date Order, each proof of interest must:

(i) be written in English; (ii) conform substantially to the Interest Form provided by Stretto; (iii) be signed by the holder of the interest or by an authorized agent or legal representative of the holder of the interest; (iv) include a current W-9 form that contains the Registered Holder, Nominee or Preferred Shareholder's tax identification number; (v) contain supporting documentation; (vi) state the date the interest holder acquired the Equity Interest; (vii) for holders of Preferred Shares, the Interest form must include a sworn declaration that the Preferred Shareholder did not previously convert its Preferred Shares to common stock; and (viii) payment instructions.

**Timely Submission.** Each proof of interest, including supporting documentation, must be submitted: (i) electronically, on or before the applicable Bar Date by completing the applicable interest form that may be accessed at Stretto's website <https://cases.stretto.com/Mabvax> or (ii) by United States mail or other hand delivery system, so as to be actually received by Stretto on or before the Bar Date at the following address: **Mabvax Therapeutics Holding, Inc., Proof of Interest Processing, c/o Stretto, 410 Exchange, Suite 100, Irvine, CA 92602.**

**PROOF OF INTEREST FORMS OTHERWISE SUBMITTED BY FACSIMILE, TELECOPY, ELECTRONIC MAIL OR OTHER FORM OF ELECTRONIC SUBMISSIONS WILL NOT BE ACCEPTED.**

**Additional Information.** If you have any questions regarding the proof of interest process and/or if you wish to obtain a copy of the Bar Date Order (which contains a more detailed description of the requirements for filing proofs of interest), a proof of interest form, you may do so by contacting Stretto, in writing, at **Mabvax Therapeutics Holding, Inc.** Proof of Interest Processing, c/o Stretto, Inc. 410 Exchange, Suite 100, Irvine, CA 92602 or visiting the Debtor's case website: <https://cases.stretto.com/Mabvax>. If you have any questions concerning the filing or processing of claims or interests, you may contact Stretto at (877) 558-5743 (Toll-Free) or (347) 758-5900 (International) or via electronic mail at [team.mabvax@stretto.com](mailto:team.mabvax@stretto.com). **Please note** that Stretto cannot advise you how to file or whether you should file, a proof of interest. The Bar Date Order can also be viewed on the Court's website at <http://www.deb.uscourts.gov>.

<sup>1</sup> The last four digits of the taxpayer identification numbers of the Debtors follow in parentheses: (i) Mabvax Therapeutics Holdings, Inc. (7903) and (ii) Mabvax Therapeutics, Inc. (1765).

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BANKRUPTCIES

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re: TOMMY'S FORT WORTH, LLC, et al., Chapter 11 Case No. 24-90000 (ELM) Debtors. (Jointly Administered)

**NOTICE OF HEARING ON CONFIRMATION OF TRUSTEE'S FIRST AMENDED JUDICIAL CHAPTER 11 PLAN OF LIQUIDATION**  
TO: ALL HOLDERS OF CLAIMS, HOLDERS OF EQUITY INTERESTS, AND PARTIES IN INTEREST IN THE ABOVE-CAPTIONED CHAPTER 11 CASES  
**PLEASE TAKE NOTICE** that on May 1, 2025, the United States Bankruptcy Court for the Northern District of Texas (the "Court") entered an order (the "Disclosure Statement Order"): (a) authorizing Mark E. Andrews, as the chapter 11 trustee (the "Trustee") appointed in the above-captioned chapter 11 bankruptcy cases of Tommy's Fort Worth, LLC and its debtor affiliates (together, the "Debtors"), as Trustee, to solicit votes on the Trustee's First Amended Judicial Chapter 11 Plan (as may be amended, supplemented, or modified from time to time, the "Plan"); (b) approving the Disclosure Statement Regarding Trustee's First Amended Judicial Chapter 11 Plan (the "Disclosure Statement") as containing adequate information" pursuant to section 1125 of the Bankruptcy Code; (c) approving the solicitation materials and documents to be included in the solicitation packages (the "Solicitation Packages"); and (d) approving procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to confirmation of the Plan.

**PLEASE TAKE FURTHER NOTICE** that the hearing at which the Court will consider confirmation of the Plan (the "Confirmation Hearing") will commence on **June 13, 2025, at 9:30 a.m. (prevailing Central Time)** before the Honorable Edward L. Morris in the United States Bankruptcy Court for the Northern District of Texas, located at Room 204, U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102.

**PLEASE TAKE FURTHER NOTICE** that the deadline for filing objections to the Plan is **June 5, 2025 (the "Objection Deadline")**. Any objection to the Plan must: (a) be in writing; (b) conform to the Bankruptcy Rules, the Bankruptcy Local Rules and any orders of the Court; (c) state, with particularity, the basis and nature of any objection to the Plan and, if practicable, a proposed modification to the Plan that would resolve such objection; and (d) be filed with the Court so as to be actually received on or before the Objection Deadline.

**UNLESS AN OBJECTION IS TIMELY SERVED AND FILED IN ACCORDANCE WITH THIS NOTICE, IT MAY NOT BE CONSIDERED BY THE BANKRUPTCY COURT AND MAY BE DEEMED OVERRULED.**

**PLEASE TAKE FURTHER NOTICE** that each entity that asserts a claim for administrative priority under section 503(b) of the Bankruptcy Code (the "Administrative Claim"), to the extent not already paid in the course of the case, must file a claim for administrative priority for allowance of such Administrative Claim by **June 5, 2025**.

**PLEASE TAKE FURTHER NOTICE** that should you have any questions or if you wish to obtain a copy of the Plan, the Solicitation Packages (or paper copies of solicitation materials), please feel free to scan the QR Code below or contact the Solicitation Agent at: (a) <https://www.omniagentsolutions.com/TommysBots-Ballots>; (b) 866-205-3146 (US & Canada toll-free) or 818-314-8114 (International); (c) 581-2967 (International); (d) [TommysBotsinquiries@omniagent.com](mailto:TommysBotsinquiries@omniagent.com); and/or (e) [TommysBotsBallotProcessing@OmniAgentSolutions.com](mailto:TommysBotsBallotProcessing@OmniAgentSolutions.com), c/o Omni Agent Solutions, Inc., 2955 E. Soto Ave., Suite 100, Woodland Hills, CA 91367.

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: Tommy's Fort Worth, LLC (8473); Tommy's Holding Company, LLC (2662); Tommy's Grand Rapids, LLC (9224); Tommy's Castaic, LLC (7501); Tommy's Lewisville, LLC (4750); High Country Watersports, LLC (6160); Walloon Lake Village Marina, LLC (10277); MB Florida Holdings, LLC (5090); Tommy's Detroit, LLC (2424); Tommy's California Fresno, LLC (8597); Tommy's Phoenix, LLC (3036); Tommy's Las Vegas, LLC (7721); Tommy's Chattanooga, LLC (0839); Tommy's California Ventura, LLC (5149); Tommy's Rancho Cordova, LLC (1070); Tommy's Stockton, LLC (1338); and Tommy's Knoxville, LLC (8052).

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re: DOCUDATA SOLUTIONS, Chapter 11 Case No. 25-90023 (CML) Debtors. (Jointly Administered)

**NOTICE OF DEADLINE FOR THE FILING OF PROOFS OF CLAIM, INCLUDING FOR CLAIMS AS ASSERTED UNDER SECTION 503(b)(9) OF THE BANKRUPTCY CODE**  
**IF YOU BELIEVE YOU HAVE A CLAIM AGAINST THE DEBTORS, YOU MUST FILE YOUR PROOF OF CLAIM ON OR BEFORE THE CLAIMS BAR DATE OF JUNE 6, 2025 AT 5:00 P.M. (PREVAILING CENTRAL TIME).**

**PLEASE TAKE NOTICE OF THE FOLLOWING:**  
On March 3, 2025 (the "Petition Date"), DocuData Solutions, L.C. and certain of its affiliates (the "Debtors") filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Southern District of Texas (the "Court"). On May 1, 2025, the Court entered an order [Docket No. 434] (the "Bar Date Order") establishing certain deadlines for the filing of proofs of claim in the Debtors' chapter 11 cases.

Pursuant to the Bar Date Order, each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, and trust) that holds or seeks to assert a claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose, or is deemed to have arisen, prior to the Petition Date (including, without limitation, claims entitled to administrative priority status under section 503(b)(9) of the Bankruptcy Code), no matter how remote or contingent such right to payment or equitable remedy may be, **MUST FILE A PROOF OF CLAIM** on or before 5:00 p.m. (prevailing Central Time), on June 6, 2025, by submitting an original proof of claim form to Omni Agent Solutions, Inc. ("Omni"), or by completing the online proof of claim form available at <https://omniagentsolutions.com/DocuDataSolutions-Claims>, so that it is actually received on or before the General Bar Date provided that, solely with respect to governmental units (as defined in section 101(27) of the Bankruptcy Code), the deadline for such governmental units to file a proof of claim against the Debtors is September 2, 2025 at 5:00 p.m. (prevailing Central Time). Proofs of claim must be sent by overnight mail, courier service, hand delivery, regular mail, or in person, or completed electronically through Omni's website. Proofs of claim sent by facsimile, telecopy, or electronic mail will not be accepted and will not be considered properly or timely filed for any purpose in these chapter 11 cases.

ANY PERSON OR ENTITY THAT IS REQUIRED TO FILE A PROOF OF CLAIM IN THESE CHAPTER 11 CASES WITH RESPECT TO A PARTICULAR CLAIM AGAINST THE DEBTORS, BUT THAT FAILS TO DO SO PROPERLY BY THE APPLICABLE BAR DATE, SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR PURPOSES OF VOTING AND DISTRIBUTION.

A copy of the Bar Date Order and proof of claim form along with a complete list of each of the Debtors in these chapter 11 cases may be obtained by contacting the Debtors' Claims Agent, in writing, at DocuData Solutions, Claims Processing, c/o Omni Agent Solutions, Inc., 5995 De Soto Ave., Suite 100, Woodland Hills, CA 91367 or online at <https://omniagentsolutions.com/DocuDataSolutions>. The Bar Date Order can also be viewed on the Court's website at <https://ecds.uscourts.gov>. If you have questions concerning the filing or processing of claims, you may contact the Debtors' claims agent, Omni, toll-free at (888) 788-6341 or if calling from outside the United States or Canada, at (747) 293-0001 or via email at [DocuDataSolutionsInquiries@omniagent.com](mailto:DocuDataSolutionsInquiries@omniagent.com). Please note that Omni cannot provide legal advice regarding the filing of a Proof of Claim, and you should consult your own attorney.

CLASS ACTION

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. KLEIGER, JUDITH A. MCHALE, RONALD L. NELSON, CHARLES E. PHILLIPS, JR., SUSAN SCHUMAN, NICOLE SELIGMAN, and FREDERICK O. TERRELL, Defendants.

**TO:** All persons and entities who purchased or otherwise acquired (i) the Class B Common Stock of ViacomCBS Inc. ("Viacom") issued in Viacom's secondary public offering, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021; and/or (ii) Viacom's 5.75% Series A Mandatory Convertible Preferred Stock issued in or traceable to Viacom's initial public offering of that Preferred Stock, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021, and were damaged thereby (the "Class").<sup>1</sup>

**THIS SUMMARY NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS SUMMARY NOTICE CAREFULLY AND IN ITS ENTIRETY.**

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the YOU ARE HEREBY NOTIFIED that a hearing (the "Settlement Hearing") will be held on **August 5, 2025, at 10:00 a.m.**, before the Honorable Andrew Borrok of the Supreme Court of the State of New York, at the New York County Courthouse, 60 Centre Street, Courtroom 238, New York, New York 10007. At the Settlement Hearing the Court will, among other things: (i) determine whether the proposed settlement of the above-captioned action (the "Action") for \$120,000,000 in cash (the "Settlement") as set forth in the Stipulation is fair, reasonable, and adequate, and should be approved by the Court; (ii) determine whether the Judgment as provided under the Stipulation should be entered; (iii) determine whether the proposed Plan of Allocation for the distribution of the Net Settlement Fund should be approved by the Court as fair and reasonable; (iv) consider Class Counsel's application for an award of attorneys' fees and Litigation Expenses, including Plaintiffs' request for payment for their efforts in prosecuting this Action on behalf of the Class; (v) consider and rule upon such other matters as the Court may deem appropriate. Any updates regarding the Settlement Hearing, including any changes to the date or time of the hearing or updates regarding in-person or remote appearances at the hearing, will be posted to the Settlement Website, [www.ViacomArcheGosSecuritiesLitigation.com](http://www.ViacomArcheGosSecuritiesLitigation.com).

This is a class action against Defendants Morgan Stanley & Co. LLC, Goldman Sachs & Co. LLC, and Wells Fargo Securities, LLC for alleged violations of sections 11 and 12(a)(2) of the Securities Act of 1933 (the "Securities Act"). Plaintiffs claim that Defendants violated the Securities Act by reason of material misrepresentations and omissions in statements issued in connection with the initial and secondary offerings referenced above. The alleged misstatements and omissions relate to each Defendants' respective relationship with ArcheGos Capital Management, LP. Defendants deny they have committed any act or omission giving rise to liability in this Action.

**IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE SETTLEMENT OF THIS ACTION.**

To share in the distribution of the Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release Form (the "Claim Form") postmarked (if mailed), or submitted online using the Settlement Website, [www.ViacomArcheGosSecuritiesLitigation.com](http://www.ViacomArcheGosSecuritiesLitigation.com), no later than **August 22, 2025**.

<sup>1</sup> All capitalized terms used in this Summary Notice that are not otherwise defined herein shall have the meanings given to them in the Stipulation and Agreement of Settlement dated March 27, 2025 (the "Stipulation"), available at [www.ViacomArcheGosSecuritiesLitigation.com](http://www.ViacomArcheGosSecuritiesLitigation.com).

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# Bernstein Litowitz Berger & Grossmann LLP and Glancy Prongay & Murray LLP Announce Notice of Pendency and Proposed Settlement Involving Persons and Entities who Purchased or Otherwise Acquired Common Stock or Preferred Stock of ViacomCBS Inc. Issued in March 2021 Offerings

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NEWS PROVIDED BY  
**JND Legal Administration →**  
May 08, 2025, 09:11 ET

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SEATTLE, May 8, 2025 /PRNewswire/ -- **JND Legal Administration**

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

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.

Justice Andrew Borrok

Part 53

**SUMMARY NOTICE OF  
(I) PENDENCY OF CLASS  
ACTION AND PROPOSED  
SETTLEMENT; (II)  
SETTLEMENT HEARING;  
AND (III) MOTION FOR  
ATTORNEYS' FEES AND  
LITIGATION EXPENSES**

**TO:** All persons and entities who purchased or otherwise acquired (i) the Class B Common Stock of ViacomCBS Inc. ("Viacom") issued in Viacom's secondary public offering, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021; and/or (ii) Viacom's 5.75% Series A Mandatory Convertible Preferred Stock issued in or traceable to Viacom's initial public offering of that Preferred Stock, which was announced on March 22, 2021, priced on March 23, 2021, and closed on March 26, 2021, and were damaged thereby (the "Class").<sup>1</sup>

**THIS SUMMARY NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS SUMMARY NOTICE CAREFULLY AND IN ITS ENTIRETY.**

YOU ARE HEREBY NOTIFIED that a hearing (the "Settlement Hearing") will be held on **August 5, 2025, at 10:00 a.m.**, before the Honorable Andrew Borrok of the Supreme Court of the State of New York, at the New York County Courthouse, 60 Centre Street, Courtroom 238, New York, New York 10007. At the Settlement Hearing the Court will, among other things: (i) determine whether the proposed settlement of the above-captioned action (the "Action") for \$120,000,000 in cash (the "Settlement") as set forth in the Stipulation is fair, reasonable, and adequate, and should be approved by the Court; (ii) determine whether the Judgment as provided under the Stipulation should be entered; (iii) determine whether the proposed Plan of Allocation for the distribution of the Net Settlement Fund should be approved by the Court as fair and reasonable; (iv) consider Class Counsel's application for an award of attorneys' fees and Litigation Expenses, including Plaintiffs' request for payment for their efforts in prosecuting this Action on behalf of the Class; (v) consider and rule upon such other matters as the Court may deem appropriate. Any updates

regarding in-person or remote appearances at the hearing, will be posted to the Settlement Website, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com).

This is a class action against Defendants Morgan Stanley & Co. LLC, Goldman Sachs & Co. LLC, and Wells Fargo Securities, LLC for alleged violations of sections 11 and 12(a)(2) of the Securities Act of 1933 (the "Securities Act"). Plaintiffs claim that Defendants violated the Securities Act by reason of material misrepresentations and omissions in statements issued in connection with the initial and secondary offerings referenced above. The alleged misstatements and omissions relate to each Defendants' respective relationship with Archegos Capital Management, LP. Defendants deny they have committed any act or omission giving rise to liability in this Action.

**IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE SETTLEMENT OF THIS ACTION.**

To share in the distribution of the Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release Form (the "Claim Form") **postmarked (if mailed), or submitted online using the Settlement Website, [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com), no later than August 22, 2025.**

Your failure to post-mark your Claim Form or to submit it online using the Settlement Website by **August 22, 2025**, will subject your claim to rejection and preclude your receiving a recovery in connection with the Settlement of this Action. If you are a member of the Class and do not request exclusion therefrom, you will be bound by the Settlement and any judgment and release entered in the Action, including, but not limited to, the Judgment, whether or not you submit a Claim Form.

If you have not received a copy of the full Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Notice"), which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), and a Claim Form, you may obtain these documents, as well as a copy of the Stipulation and other settlement documents, online at [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com), by contacting the Claims Administrator by email at [info@ViacomArchegosSecuritiesLitigation.com](mailto:info@ViacomArchegosSecuritiesLitigation.com), or by writing to:

*Viacom Archegos Securities Litigation*

c/o JND Legal Administration

P.O. Box 91010



Inquiries should NOT be directed to Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or Claim Form, may be made in writing to Class Counsel:

Bernstein Litowitz Berger & Grossmann LLP

Attn: John Rizio-Hamilton

1251 Avenue of the Americas

New York, NY 10020

Email: [settlements@blbgllaw.com](mailto:settlements@blbgllaw.com)

-or-

Glancy Prongay & Murray LLP

Attn: Daniella Quitt

745 Fifth Avenue, 5th Floor

New York, NY 10151

Email: [dquitt@glancylaw.com](mailto:dquitt@glancylaw.com)

If you are a member of the Class and wish to be excluded from the Class, you must submit a request for exclusion such that it is **received no later than July 15, 2025**, in the manner and form explained in the Notice. If you properly exclude yourself from the Settlement Class, you will not be bound by any judgments or orders entered by the Court in the Action and you will not be eligible to share in the proceeds of the Settlement.

If you are a Class Member, you have the right to object to the Settlement, the Plan of Allocation, the request by Class Counsel for an award of attorneys' fees and Litigation Expenses and/or the awards to Plaintiffs for representing the Settlement Class. Any objections must be filed with the Court and sent to Class Counsel and Defendants' Counsel such that they are **received no later than July 15, 2025**, in the manner and form explained in the Notice.

**BY ORDER OF THE SUPREME COURT OF NEW YORK,**

RECEIVED NYSCEF: 07/01/2025

COUNTY OF NEW YORK.

HONORABLE ANDREW BORROK, J.S.C.

<sup>1</sup> All capitalized terms used in this Summary Notice that are not otherwise defined herein shall have the meanings given to them in the Stipulation and Agreement of Settlement dated March 27, 2025 (the "Stipulation"), available at [www.ViacomArchegosSecuritiesLitigation.com](http://www.ViacomArchegosSecuritiesLitigation.com).

SOURCE JND Legal Administration