

DECLARATION OF LANCE BLAIR ON MAILED NOTICE OF SETTLEMENT AND
CLAIMS ADMINISTRATION STATISTICS PURSUANT TO ORDER
PRELIMINARILY APPROVING SETTLEMENT

LANCE BLAIR hereby declares and states:

1. I am a Director of Operations of The Garden City Group, Inc. ("GCG"), the Claims Administrator for the TV Writers Cases Settlement Agreements, as defined in this Court's January 22, 2010 Administrative Order No. 2 (hereafter "AO2"). I am in charge of the administration of the Settlements at GCG.¹

2. Pursuant to AO2, GCG caused to be printed and mailed, first-class postage prepaid, the written notice of the Settlements attached as Exhibit 1 to AO2 and the Claim Form to all Persons whose names and mailing addresses were provided to GCG by the WGA as current and former members at least forty years of age or whose age was unknown. GCG thus caused to be mailed 20,444 Claim Form and notice packages to Persons on January 27, 2010.

3. In addition, GCG caused to be printed and sent by Standard mail, postage prepaid, the written notice of the Settlements attached as Exhibit 5 to AO2 to all Persons whose names and mailing addresses were provided to GCG by the WGA as beneficiaries of former members (a) who died on or after October 22, 1996 and (b) who were at least 40 years old at the time of death or whose age was unknown at the time of death. In total, GCG thus caused to be mailed 1,947 notices to Persons on January 28, 2010.

4. Pursuant to AO2, GCG also caused to be printed and sent by Standard mail the written notice of the Settlements attached as Exhibit 4 to AO2 to all Persons whose names and mailing addresses were provided to GCG by the WGA as Persons who had registered certain types of material in its script registration databases, except for those notified per paragraph two *supra* or those who received email notice as set forth in paragraph six *infra*. I understand that the WGA agreed to provide the names and mailing addresses of persons who registered materials with WGA in categories other than art, autobiography, bio, commercial, IPR, lyrics, music, musical, notes, other, photograph, poems, trailer, and translation. In total, GCG thus caused to be mailed 228,582 notices to these Persons. The first mailing was on January 28, 2010, and was

¹ All capitalized terms are as defined in AO2, AO4 and/or other Settlement documents internally referenced therein.

1 directed to Persons for whom the WGA did not provide an email address. The quantity of the
2 first mailing was 51,753. The second mailing was on February 5, 2010, after the email campaign
3 described in paragraph six, *infra*. The second mailing was directed to Persons for whom the
4 WGA provided an email address, but the email address proved to be invalid or the email notice
5 was undeliverable. The quantity of the second mailing was 176,829.

6 5. GCG ran the mailing lists created pursuant to paragraphs two through four, *supra*,
7 through the National Change of Address database, and if not updated therein, through
8 Lexis/Nexis as a secondary update service prior to mailing notice. GCG updated approximately
9 197,000 addresses thusly.

10 6. Pursuant to AO2, GCG sent by email the written notice of the Settlements
11 attached as Exhibit 4 to AO2 to all Persons whose names and email addresses were provided to
12 GCG by the WGA as Persons who had registered certain types of material in its script
13 registration databases, except for those notified per paragraph two *supra*. I have the same
14 understanding of the categories of materials that the WGA agreed to exclude from the list of
15 names that is set forth in paragraph four, *supra*. In total, GCG thus emailed 209,897 email
16 notices to these Persons during the 2-day period beginning January 27, 2010. On February 3,
17 2010, GCG made a second email attempt to email addresses for which the first email “bounced”
18 with an indication that a later attempt might be successful (*e.g.* there was an indication that the
19 mailbox was full). An additional 6,387 emails were sent as a result of the second attempt.

20 7. In total, GCG mailed 250,793 notices and emailed 216,284 notices.

21 8. 2,166 mailed notices were returned as undeliverable. Of those, 363 had a “next
22 available address”, to which GCG remailed notices. 32,550 emailed notices bounced back as
23 undeliverable. The WGA had provided mailing addresses for 32,431 of them, and GCG mailed
24 notice to them. Of those notices mailed or remailed as described in this paragraph, 107 were
25 returned.

26 9. On January 22, 2010, immediately prior to the mailing of notice, Lead Class
27 Counsel caused a website at www.TVWritersSettlementAdmin.com with content about the
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1 Settlements as agreed on by Lead Class Counsel and Defendants' Liaison Counsel to become
2 operational. GCG subsequently assumed control of the website. From time to time, information
3 on that website has been updated with content about the Settlements also agreed on by Lead
4 Class Counsel and Defendants' Liaison Counsel. Through April 30, 2010, there were 17,858
5 visits to the website, and 9,406 Claim Forms were downloaded from the site.

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7 10. On January 22, 2010, immediately prior to the mailing of notice, GCG established
8 a toll-free telephone number for class members with automated voice recordings providing non-
9 privileged, generalized responses about the Settlements to questions that callers selected by
10 pushing buttons on their telephones. The content of each question and answer was preapproved
11 by both Lead Class Counsel and Defendants' Liaison Counsel. Through April 30, 2010, GCG
12 had received 3,972 calls to this toll-free telephone number.

13 11. On January 22, 2010, immediately prior to the mailing of notice, GCG established
14 an email address, questions@tvwriterssettlementadmin.com, to which Persons could email
15 questions or requests. Through April 30, 2010, GCG responded to approximately 375 emails to
16 this address.

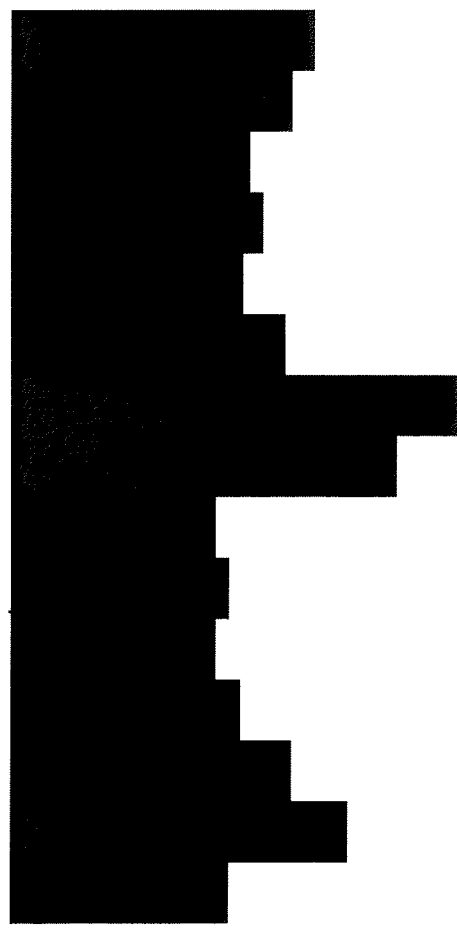
17 12. In total, GCG received 4,246 timely Claim Forms. GCG has identified 652
18 claims with deficiencies (instances in which required information was not provided) and sent
19 deficiency notices as to each of them. Through April 30, 2010, 200 deficient claims had been
20 cured. GCG will declare any Claim Forms for which deficiencies are not cured within 21 days
21 after the sending of notice to be invalid, but through April 30, 2010, no final notices of claim
22 rejection had been sent.

23 13. 2,211 of the Claim Forms were received from claimants who, by their answer to
24 question I.E, indicated that they were members of the Professional Television Writers ("PTW")
25 Settlement Class, and 2,022 were from claimants who, by their answer to question I.E., indicated
26 that they were members of the Aspiring Television Writers ("ATW") Settlement Class.

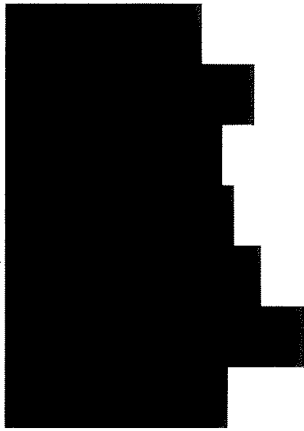
27 14. Through April 30, 2010, GCG has received 65 Claim Forms postmarked after the
28 deadline date of April 13, 2010.

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15. GCG has received 24 requests for exclusion from the Settlement, of which 2 were withdrawn, leaving 22 pending requests for exclusion. Lead Class Counsel and Defendants' Liaison Counsel have not challenged any of the 22 pending requests as invalid. They are from the following Persons, and copies of their requests are attached hereto as **Exhibit A:**



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2 16. The following five Persons submitted comments about the Settlements that were
3 received by GCG:

- 4 a. David Charles Barrow;
5 b. Steven Geller;
6 c. Father Guy Gurath;
7 d. Kevin Kelton; and
8 e. Michael Russnow.

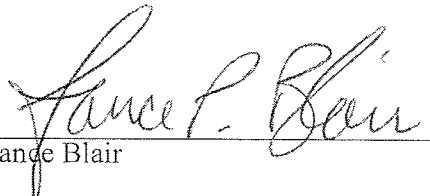
9 All five names were on the lists provided by the WGA. The submission of one of these Persons
10 also contained an objection, and that Person is also listed in paragraph 17 *infra*. A copy of each
11 comment is attached as **Exhibit B**. In addition, I understand that Lead Class Counsel intend to
12 include as comments the comments submitted in support of Preliminary Approval of the
13 Settlement prepared by members of the Plaintiffs' Liaison Committee.

14 17. The following four Persons submitted objections to the Settlements:

- 15 a. Dorothy Ahlswede;
16 b. David Charles Barrow;
17 c. Joan Keating; and
18 d. Claudia Prada.

19 Mr. Keating, Mr. Barrow and Ms. Ahlswede were on the lists provided by the WGA. The
20 submission of one of these Persons also contained comments, and that Person is also listed in
21 paragraph 16 *supra*. A copy of each objection is attached hereto as **Exhibit C**.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct, and that this declaration was executed on May 5, 2010, in Seattle,
24 Washington.

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26 
27 Lance Blair
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