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**DECLARATION OF
PATRICIA McCARRON**

I, Patricia McCarron, hereby declare as follows:

Introduction

1. I am President of Yellin/McCarron, Inc. Yellin/McCarron (YM) has created successful media strategies for clients in the fields of health care, finance, retail, entertainment, advocacy, and politics for more than 30 years. We have placed millions of dollars of advertising annually in large and small media markets all over the United States, as well as in South America, Europe, Asia, and Australia. Our team has experience working with all types of media – from broadcast and print to out-of-home and online.
2. I am making this declaration in connection with Plaintiffs’ Motion for Final Approval of Settlement.

Published Notice Placement Procedures

3. Paul Sprenger, Lead Counsel in the TV Writers Cases, hired Yellin McCarron to provide media purchasing services in relation to the Published Notice in the TV Writers Settlement. YM negotiated prices for the run specifications pursuant to Mr. Sprenger’s direction and the Court’s Order Directing Notice. YM contacted each of the print entities listed in the chart below to secure the final ordered publication run dates and notice placement sizes as shown. Each entity provided us with a tear-sheet for each separate run date, attached as Exhibit 1, Tab 1.

EXHIBIT 1 – TAB 1 – TEAR SHEETS FOR PUBLISHED NOTICE

MEDIUM	RUN DATE	SIZE
NEW YORK TIMES Attn: Matt Zander Address: 620 8 th Ave., New York, NY 10018	2/10/10	1/4 page
	2/16/10	1/4 page
LA TIMES Attn: Daniel Arretche Address: 202 West 1 st Street, Los Angeles, CA 90012	2/10/10	1/4 page
	2/16/10	1/4page
Newsweek Magazine (Weekly) Attn: Paul Gillespie Address: 395 Hudson Street, New York, NY 10041	2/8/10	2/3 page
People Magazine (Weekly) Attn: Nikki Lesage Address: Time Life Building, Rockefeller Center, New York, NY, 10020	3/11/10	2/3 page
USA Weekend Magazine (Weekly) Attn: Brian Henry Address: 7950 Jones Branch Drive, McLean, VA 22108	2/21/10	2/5 page
Parade Magazine (Weekly) Attn: Kathleen Wolf Address: 711 3 rd Ave, New York, NY 10017	2/21/10	2/5 page
Variety Daily (Trade Publication) Attn: Adam Gross Address: 5900 Wilshire Blvd, Los Angeles, CA 90036	2/10/10	1/3 page
	2/17/10	1/4 page
Hollywood Reporter (Trade Publication) Attn: Nicole Fairres Address: 5055 Wilshire Blvd, Los Angeles, CA 90036	2/10/10	1/2 page
	2/17/10	1/4 page
The Chronicle of Higher Education (Trade Publication) Attn: Sonya Scott Address: 1255 Twenty-third Street, N.W., Washington D.C. 20037	2/12/10	2/5 page

4. Also as requested, Yellin McCarron contacted each of the niche internet sites listed in the chart below to secure online banner notice of the TV Writers Settlement, which linked via a splash page to the home pages for the TV Writers Settlement Counsel and TV Writers Settlement Administrator. YM hired the Graphic Design firm of Lightning Design, of Arlington, MA, to create the internet banner layouts based on the content and design specifications provided by Paul Sprenger, which were used on these niche sites. DART reports verify that each entity served the

1 number of impressions purchased, as set out in the Court Order Directing Notice. The DART
2 Reports are attached as Exhibit 2 – Tab 2.

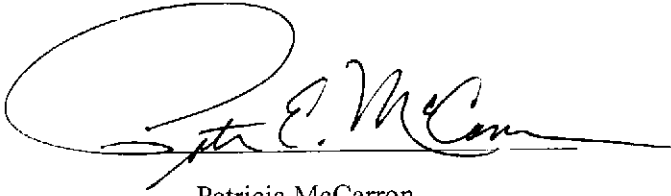
3 **EXHIBIT 2 – TAB 2 – DART REPORTS**

MEDIUM	RUN DATES	NUBER OF IMPRESSIONS*	AD SIZE
creativescreenwriting.com Attn: Nancy Miller Address: (Y/M to fill in)	2/8/10 – 3/9/10	40,000	728x90 300x250
writersdigest.com Attn: (Y/M to fill in) Address: (Y/M to fill in)	2/8/10 – 3/9/10	230,000	728x90 300x250
variety.com Attn: Adam Gross Address: (Y/M to fill in)	2/8/10 – 3/9/10	1,126,460	728x90 300x250
hollywoodreporter.com Attn: Nicole Fairres Address: (Y/M to fill in)	2/8/10 – 3/9/10	1,507,000	728x90 300x250

10 * Impression defined as a single instance of an online notice being displayed in an open internet browser window

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12 I declare under penalty of perjury under the laws of the State of California that the foregoing is
13 true and correct, and that this declaration was executed on this 4th day of May, 2010 in
14 Boston, MA.

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17 

18 Patricia McCarron
19 Yellin/McCarron, Inc.
20 280 Summer Street, 4th Floor
21 Boston, MA 02210
22 P 617.426.9211
23 F 617.426.7443