



May 7 2010  
10:39AM

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
16 **FOR THE COUNTY OF LOS ANGELES - CENTRAL CIVIL WEST**

17 IN RE: TV WRITERS CASES

**Case Nos. BC 268836 (and related cases)**  
**[Assigned to Hon. Emilie H. Elias for all purposes]**

19 THIS DOCUMENT RELATES TO:

**SUPPLEMENTAL DECLARATION OF  
PAUL C. SPRENGER IN SUPPORT OF  
MOTION FOR FINAL APPROVAL OF  
SETTLEMENTS RE: CONFIDENTIALITY  
CONCERNS OF CLASS MEMBERS**

20 **Case No. 268 836** – Alch, et al. v. Time  
21 Warner Entertainment Company, L.P.,  
et al.;

22 **Case No. 268 837** – Neal, et al. v. Viacom  
23 Inc. and United Paramount Network;

24 **Case No. 268 838** – Young, et al. v.  
DreamWorks SKG TV LLC;

25 **Case No. 268 839** – Bast, et al. v. Fox  
Broadcasting Company, et al.;

26 **Case No. 268 840** – Levy, et al. v. The  
Gersh Agency, Inc.;

27 **Case No. 268 841** – Edwards, et al. v. The  
28 Carsey-Werner Co., et al.;

**DATE: May 14, 2010**  
**TIME: 1:45 p.m.**  
**DEPT: 324**

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- Case No. 268 842** – Wynn, et al. v. National Broadcasting Company, Inc., et al.;
- Case No. 268 843** – Brooks, et al. v. William Morris Agency, Inc.;
- Case No. 268 844** – Brett, et al. v. Walt Disney Company, et al.;
- Case No. 268 845** – Distefano, et al. v. Columbia TriStar Television, Inc.;
- Case No. 268 847** – Eisenson, et al. v. Lucy Stille & Associates, Inc., d/b/a Paradigm Talent & Literary Agency, et al.;
- Case No. 268 848** – Lang, et al. v. Shapiro-Lichtman, Inc., d/b/a Shapiro Lichtman-Stein;
- Case No. 268 849** – Neal, et al. v. The Endeavor Agency, Inc.;
- Case No. 268 877** – Kinghorn, et al. v. Universal Studios, Inc., et al.;
- Case No. 268 878** – Moriarty, et al. v. Viacom Inc., Paramount Studios, Inc., et al.;
- Case No. 268 880** – Yanok, et al. v. Agency for the Performing Arts, Inc.;
- Case No. 268 881** – Schwartz, et al. v. United Talent Agency, Inc.;
- Case No. 268 882** – Shayne, et al. v. Viacom Inc. and CBS Broadcasting Inc.; and
- Case No. 268 883** – Kalish, et al. v. Viacom Inc., Spelling Entertainment Inc., et al.

PAUL C. SPRENGER hereby declares and states:

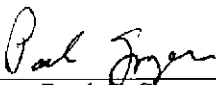
Based on my observations and supervision of the class member claims counseling process in this settlement, the most frequently expressed concern of class members considering submitting a claim by the April 13 deadline was their right to maintain confidentiality over the content of their claim form, including their identity and any award they might receive. Confidentiality of the claims process was the primary concern

1 expressed by the about 100 claimants who called me directly and/or whose concerns were  
2 referred to me as overall supervisor of the claimant-counseling staff. The same class  
3 member concerns were reported to me by Denise Adams, the lead claims assistant who  
4 supervised the five other legal assistants assigned to the project during the claims filing  
5 period from January 22 until April 13, 2010. Almost all of the over 3,700 class members  
6 who consulted with Class Counsel on an attorney-client privileged basis, expressed  
7 concern about their right to maintain confidentiality of the fact of their having submitted  
8 a claim, the content of their claim form and/or the amount of any award. In my opinion,  
9 many, if not most, would not have filed claims but for the assurances of privacy and  
10 confidentiality of the claims process which Class Counsel provided based the terms of the  
11 settlement (which limited review to Class Counsel, the claims administrator and, in  
12 camera, to the Court and, under strict terms of protective orders and for limited purposes,  
13 counsel for released defendants).

14 The inquiring class members next most frequently expressed concern was the  
15 amount and/or when any award might be made, which occurred about half the time.

16  
17 I declare under penalty of perjury under the laws of the State of California that the  
18 foregoing is true and correct.

19 Dated: May 6, 2010 in Washington, DC.

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Paul C. Sprenger