

1 Supervising Producer, Co-Executive Producer-Writer or Co-Executive Producer, Executive
2 Producer-Writer or Executive Producer, Creative Consultant, Consultant, or Creator, and
3 specifically includes jobs and opportunities in connection with the development of projects
4 (including pilots and script deals) for television, as well as one-off television projects (including
5 movies of the week) and series assignments.

6 43. “Trustee(s)” refers to the persons designated as Trustee(s) of Settlement
7 Fund II and QSF II, respectively, and named in Administrative Order Nos. 1 and 3.

8 44. “Work(s)” means any literary material, production, program, project, work,
9 script, teleplay, treatment, bible, format, written pitch, story, or development deal/agreement.

10 45. “Writers Guild” or “WGA” refers, collectively, to the Writers Guild of
11 America, West, Inc. and the Writers Guild of America, East, Inc.

12 B. Additional terms are defined, in context, throughout this Agreement.

13 **VII. RELEASES**

14 **A. Definitions Relevant To Release Provisions**

15 1. “Released Persons” means the Defendants and the Settling Party Affiliates,
16 as defined in Section VII.A.3.

17 2. “Releasing Party” or “Releasing Parties” means all Members of the
18 Settlement Classes, and any other Person who can claim by or through any of them, including but
19 not limited to each such Person’s present or former spouses, issue, heirs, estates, beneficiaries,
20 executors, conservators, administrators, principals, agents, predecessors, successors, assigns,
21 receivers, loan-out companies (and any existing or former officers, directors, agents, general or
22 limited partners, representatives, assigns, successors, predecessors or affiliates of such loan-out
23 companies), independent contractors, representatives, attorneys, and insurers, to the extent that
24 they have claims by or through the Settlement Class Member.

25 3. “Settling Party Affiliates” means: (a) each and all of the Defendants and
26 each and all of their respective current and former divisions, affiliates, units, subsidiaries (direct or
27 indirect, wholly or partially owned or controlled), parents, partners and partnerships (general,
28 limited, or otherwise), joint ventures, divisions, limited liability companies, unincorporated

1 associations, managers, members, managing members, benefit plans, and all other affiliated
2 entities or Persons; and (b) each and all of their respective and collective current and former
3 employees, officers, directors, agents, representatives, shareholders, attorneys, accountants,
4 insurers and reinsurers (but only to the extent of any insurance provided to any of the Persons
5 identified in this paragraph), advisors, partners and partnerships (general, limited or otherwise),
6 managers, members, managing members, assigns, successors, heirs, predecessors in interest,
7 successors, and affiliates.

8 4. "Released Claims" means

- 9 a. any and all causes of action, claims, demands, complaints,
10 grievances, or liabilities, of any kind or nature whatsoever;⁴
- 11 b. arising under any state, federal or local Constitutional provision,
12 statute, common law, regulation, Executive Order or other law (including but not limited to the
13 Age Discrimination in Employment Act of 1967, as amended by the Older Workers' Benefit
14 Protection Act of 1990), claims arising under contract or agreement (including but not limited to
15 any collective bargaining agreement), claims arising under tort law, whether intentional or
16 unintentional, and claims arising under any theories of liability based upon aiding and abetting,
17 civil conspiracy, joint employer, or any other theory of joint, common, or derivative liability;
- 18 c. whether known or unknown, suspected or unsuspected;
- 19 d. based upon any legal or equitable theory;
- 20 e. which the Settlement Class Members and their Releasing Parties, or
21 any of them, had, has, claims, may have, or may come to possess; and
- 22 f. which, by reason of any and all matters, from the beginning of time
23 through the Preliminary Approval Date of the Settlement, relate to, connect with, or arise out of, in
24 whole or in part, directly or indirectly:

25 _____

26 ⁴ This includes, without limitation, any and all claims for damages, back pay, front pay, disputed
27 compensation, injunctive relief, reinstatement, penalties, interest, attorneys' fees, costs, punitive
28 damages, and any other relief a Court may grant.