

- 1 m. *Levy, et al. v. The Gersh Agency, Inc.*, Case No. BC 268840;
- 2 n. *Mintz, et al. v. Broder Kurland Webb Agency, Inc.*, Case No. BC
- 3 268850;
- 4 o. *Moriarty, et al. v. Viacom Inc., et al.*, Case No. BC 268878;
- 5 p. *Neal, et al. v. The Endeavor Agency, Inc.*, Case No. BC 268849;
- 6 q. *Neal, et al. v. Viacom Inc., et al.*, Case No. BC 268837;
- 7 r. *Ruben, et al. v. Creative Artists Agency, LLC*, Case No. BC 268
- 8 879;
- 9 s. *Schwartz, et al. v. United Talent Agency, Inc.*, Case No. BC
- 10 268881;
- 11 t. *Shayne, et al. v. Viacom, Inc. and CBS Broadcasting, Inc.*, Case
- 12 No. BC268882.
- 13 u. *Wynn, et al. v. National Broadcasting Company, Inc., et al.*, Case
- 14 No. BC 268842;
- 15 v. *Yanok, et al. v. Agency for the Performing Arts, Inc.*, Case No. BC
- 16 268880; and
- 17 w. *Young, et al. v. DreamWorks SKG TV, LLC, et al.*, Case No. BC
- 18 268838.

19 42. "Television Writing Opportunities" is defined to include any television
20 writing job, position or opportunity, including, but not limited to, (a) any opportunity to sell or
21 option literary material intended or considered for television production or exhibition (whether or
22 not actually produced or exhibited), or literary material actually used for television production or
23 exhibited on television, and (b) any actual or potential employment opportunities for positions as
24 Freelance-Story writer, Freelance-Teleplay writer, Freelance-Story and Teleplay writer, Staff
25 Writer, Story Editor, Executive Story Editor (as those terms are understood in the television
26 industry), or any other position that involves writing covered by the MBA or other Work intended
27 for television. Such positions may include those entitled Supervising Producer-Writer or
28 Supervising Producer, Co-Executive Producer-Writer or Co-Executive Producer, Executive

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

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

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

9 45. "Writers Guild" or "WGA" refers, collectively, to the Writers Guild of
10 America, West, Inc. and the Writers Guild of America, East, Inc.

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

12 VII. RELEASES

13 A. Definitions Relevant To Release Provisions

14 1. "Released Persons" means the Defendant and the Settling Party Affiliates,
15 as defined in Section VII.A.3.

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

24 3. "Settling Party Affiliates" means: (a) Columbia TriStar Television, Inc.,
25 CPE Holdings, Inc., and each and all of their current and former parents, divisions, affiliates,
26 units, direct or indirect, wholly or partially owned or controlled subsidiaries, partners and
27 partnerships (general, limited, or otherwise), joint ventures, limited liability companies,
28 unincorporated associations, managers, members, managing members, benefit plans, and any other