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2 **DECLARATION OF LANCE P. BLAIR IN SUPPORT OF MOTION FOR APPROVAL**
3 **OF CLAIM FORMULA**

4 LANCE P. BLAIR hereby declares and states:

5 1. I am a Director of Operations of The Garden City Group, Inc. ("GCG"), the
6 Claims Administrator for the TV Writers Cases Settlement Agreements. I am in charge of the
7 administration of the Settlement at GCG. All statements herein are based on my personal
8 knowledge, except as otherwise expressly noted.

9 2. I refer in this declaration to a proposed formula. The document attached as
10 Exhibit A to the Motion for Approval of Claim Formula and the supporting Memorandum
11 contains the terms of the formula. I also refer to the numbers of persons filing claim forms.
12 These figures are based on claim forms submitted through June 1, 2010, including those that are
13 deficient or were postmarked after the deadline.

14 3. The Settlement required Settlement Class Members to submit a claim form
15 postmarked by April 13, 2010, in order to be eligible to receive an award. Four thousand two
16 hundred two (4,202) persons submitted claim forms by the postmark deadline, and 110 others
17 submitted claims after that date through May 20, 2010.

18 4. Question I.E of the claim form asked claimants whether they had been paid to
19 write for television. Two thousand two hundred thirty-one (2,231) of the claimants stated that
20 they had been paid to write for television, 2,070 stated that they had not, and eleven claimants
21 left that question blank despite the notice that we sent to them that their claim form was deficient
22 in that respect. Of those who answered "yes," 46 did not provide proof of having earned
23 television writing income or sign the privacy waiver so that we could obtain income information
24 from the Writers Guild of America ("WGA") (even though we sent each of them a deficiency
25 notice informing them that their form would be deemed deficient if they did not do one or the
26 other), and they were not on the mailing lists that the WGA provided to us in January 2010 of its
27 members and associate members. Class Counsel informed me to treat those 46 claimants as
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1 members of the Aspiring Television Writers Settlement Class. Of those who answered “no” or
2 left the question blank, twenty (20) nonetheless provided proof that they had been paid to write
3 for television. Class Counsel informed me to treat the persons who provided proof that they had
4 been paid to write for television as members of the Professional Television Writers Settlement
5 Class. Class Counsel also informed me to treat persons who did not answer question I.E and
6 who did not provide proof of payment to write for television as members of the Aspiring
7 Television Writers Settlement Class. Accordingly, there are 2,205 members of the former
8 settlement class and 2,107 members of the latter.

9 5. Professional writers who provided any salary information averaged more than
10 \$130,000 in earnings per year in current dollars from television writing work during their high
11 five years of income. Eleven (11) of the claimants averaged more than \$1,000,000 in earnings
12 per year in current dollars from television writing work during their high five years of income.

13 6. Three hundred forty-five aspiring writers entered on their claim forms that they
14 had talent agency representation at some time during the liability period and hence, under the
15 formula, are evaluated under the same criteria as professional writers.

16 7. At the request of Lead Class Counsel, we have applied various permutations of
17 the formula to the claim forms that we have received and processed on several occasions over the
18 past few weeks. In every run, the plurality of the points have been awarded based on the
19 questions that Lead Class Counsel has classified as “liability.” Many of the changes that Lead
20 Class Counsel has made to the formula have had the effect of increasing the number of damages
21 points relative to liability points, but still, the total number of liability points consistently has
22 been much larger than the total number of damages points.

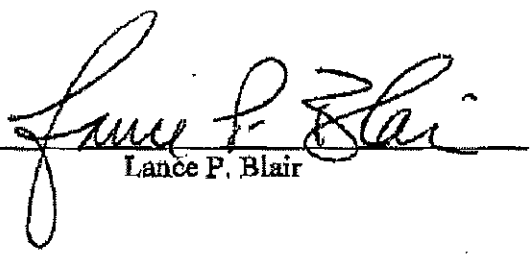
23 8. Class Counsel instructed GCG, and I instructed our coders, that in evaluating
24 answers on claim forms, they should also include information contained in claimants’
25 declarations, and in particular the declarations of aspiring writers in response to Section II. In
26 general, the information in the declarations was relevant to the liability questions in Section IV.

27 9. Once all of the point tabulations required under the formula were completed,
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- We calculated the total number of points for each claimant, the total amount of points awarded, and the percentage of that total attributable to each claimant;
- We assigned all claimants with no points an award of \$250, the floor for all eligible claimants and subtracted that amount from the total available for distribution based on the points awarded;
- We subtracted the FFF waiver enhancements for those claimants who waived participation in the FFF from the total amount available for distribution based on the points awarded;
- After subtracting the \$250 and the FFF waiver enhancements from the amount available for distribution, we allocated the remainder based on the percentage of the total points allocated to each claimant; and
- We added the \$250 and the FFF waiver enhancements to the amount of the awards based on the total points allocated to each claimant.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I executed this declaration in Scranton, Pennsylvania on June 4, 2010.

By: 
Lance P. Blair