

LEGAL NOTICE

If you are the legal beneficiary or the administrator of the estate of a deceased person who wrote or was interested in writing for television, a proposed settlement may affect the estate's rights.

Seventeen television networks and studios and seven talent agencies have agreed, subject to Court approval, to settle age discrimination allegations in connection with the hiring and representation of television writers age 40 or over, in nineteen separate class action lawsuits, for a collective payment of \$70,000,000. (Insurance carriers are paying approximately two-thirds of the settlement amount.) If you are a legal beneficiary or the administrator of the estate of a deceased Settlement Class Member, you may send in a claim form on behalf of the estate to request benefits and may comment on or object to the settlement. If you and the other legal beneficiaries/administrators do not want the estate to be part of the settlement, you can request exclusion from the settlement on behalf of the estate.

WHO'S INCLUDED?

The settlement defines two classes – (a) persons age 40 or over who have previously written for television, and (b) other persons age 40 or over who have been interested in writing for television. There are various qualifications and exclusions. Legal beneficiaries and estate administrators may be entitled to exercise the rights of the deceased. If you were mailed this notice, the records of the Writers Guild of America reflect that you are a beneficiary or estate administrator of a former WGA member. You can get more information, including a detailed notice and a deceased Settlement Class Member claim form package, at the websites or telephone numbers below.

WHAT'S THIS ABOUT?

The separate lawsuits all claim that the networks, studios and talent agencies discriminate on the basis of age in their employment and representation decisions. The defendants (including ABC, APA, Carsey-Werner, CBS, Columbia TriStar Television, Inc., DW SKG TV LLC, formerly known as DreamWorks SKG TV LLC, Fox, NBC Universal, Paradigm, Shapiro-Lichtman, Sony Pictures Television Inc., Spelling Television, The Gersh Agency, The Endeavor Agency, The WB Television Network, Touchstone Television, TriStar Television, Inc., Twentieth

Century Fox, UPN, UTA, Warner Bros. Television, William Morris Agency, and William Morris Endeavor Entertainment LLC) deny that they discriminate, but believe it makes sense to end the litigation, which has been pending since 2000. The Court did not decide which side was right.

WHAT DOES THE SETTLEMENT PROVIDE?

Of the \$70 million settlement, the lawyers representing Plaintiffs and the Settlement Class ("Class Counsel") estimate that about \$43 million will be used to pay awards to Settlement Class Members, pay taxes on those awards, fund activities beneficial to the Settlement Class Members, and fund certain reserves required under the Settlement. One-third of the Settlement will be used to pay Class Counsel's court-approved contingent fee award. The remaining 6.7% will be used to pay and reimburse expenses related to litigation of the claims and notice and administration of this Settlement. Part of that expense portion will be contributed to fund programs for living Settlement Class Members.

The share of the fund that each eligible claimant receives will be based on a formula that, once devised, will be submitted to the Court for approval. It will consider many factors, including the Settlement Class Member's income from and qualifications for television writing.

HOW DO YOU ASK FOR A PAYMENT?

To qualify for a payment, you must submit a claim form on behalf of the decedent. Call or visit a website below to get a deceased Settlement Class Member claim form package. **Claim forms are due by April 13, 2010.** You must also submit information/proof establishing your entitlement as a beneficiary or legal rights as administrator to act on behalf of the estate. Question and answer 39 on the FAQ page of www.TVWritersCounsel.com and www.TVWritersSettlementAdmin.com provide some information regarding these matters, but you may ultimately need to consult a probate/estate lawyer or other specialist, at your own cost, in order to submit a claim on behalf of the decedent.

Claims Administrator: www.TVWritersSettlementAdmin.com **1-888-730-7198**
Class Counsel: www.TVWritersCounsel.com **1-877-518-7090**

WHAT ARE YOUR OTHER OPTIONS?

Legal beneficiaries and estate administrators may comment on the settlement by **April 14, 2010**. To preserve the estate's right, if any, to sue any of the defendants for past alleged age discrimination, all persons legally entitled to act on behalf of the estate must request exclusion by **April 8, 2010**. If you exclude the estate, it will not get money from the settlement. The detailed notice explains how to exclude the estate or comment. If the estate does nothing, it will not receive a payment, but the estate will still give up any right it may have to sue defendants or their affiliates and certain others about alleged age discrimination that occurred prior to January 22, 2010.

The Court will hold a hearing in these cases, which is currently scheduled for **May 5, 2010**, (but which may be rescheduled) to consider whether to finally approve the settlement and the request for attorneys' fees and costs. Legal beneficiaries and estate administrators may ask to speak at the hearing.

CAN I CONSULT WITH CLASS COUNSEL?

Yes. To consult with Class Counsel (led by Paul Sprenger of Washington DC), at no charge, contact them at the number or website below, or email them at questions@TVWritersCounsel.com. All communications with Class Counsel are confidential and privileged.