

1 PAUL SPRENGER AND JANE LANG, ATTORNEYS

2 Paul C. Sprenger (DC Bar No. 412029)

3 Jane Lang (DC Bar No. 031112)

4 1614 Twentieth Street, N.W.

5 Washington, D.C. 20009

6 Telephone: (202) 518-2021 - Facsimile: (202) 518-0228

7 SPRENGER & LANG, PLLC

8 Steven M. Sprenger (DC Bar No. 418736)

9 Michael D. Lieder (DC Bar No. 444273)

10 1400 Eye Street, N.W., Suite 500

11 Washington, D.C. 20005

12 Telephone: (202) 265-8010 - Facsimile: (202) 332-6652

13 SCHWARTZ, STEINSAPIR, DOHRMANN & SOMMERS LLP

14 Henry M. Willis (CA Bar No. 82981)

15 6300 Wilshire Boulevard, Suite 2000

16 Los Angeles, California 90048-5268

17 Telephone: (323) 655-4700 - Facsimile: (323) 655-4488

18 KATOR, PARKS & WEISER, PLLC

19 Maia Caplan (DC Bar No. 422798)

20 1200 18th Street, N.W., Suite 1000

21 Washington, D.C. 20036

22 Telephone: (202) 898-4800 - Facsimile: (202) 289-1389

23 *Attorneys for Plaintiffs* (other attorneys identified on signature block)

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

25 IN RE: TV WRITERS CASES

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

27 THIS DOCUMENT RELATES TO:

28 **DECLARATION OF PAUL C. SPRENGER  
IN SUPPORT OF MOTION FOR FINAL  
APPROVAL OF SETTLEMENT**

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

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

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

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

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

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

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

1 **Case No. 268 842** – Wynn, et al. v.  
National Broadcasting Company, Inc.,  
2 et al.;

3 **Case No. 268 843** – Brooks, et al. v.  
William Morris Agency, Inc.;

4 **Case No. 268 844** – Brett, et al. v. Walt  
Disney Company, et al.;

5 **Case No. 268 845** – Distefano, et al. v.  
Columbia TriStar Television, Inc.;

6 **Case No. 268 847** – Eisenson, et al. v.  
Lucy Stille & Associates, Inc.,  
7 d/b/a Paradigm Talent & Literary  
Agency, et al.;

8 **Case No. 268 848** – Lang, et al. v.  
Shapiro-Lichtman, Inc., d/b/a Shapiro  
9 Lichtman-Stein;

10 **Case No. 268 849** – Neal, et al. v. The  
Endeavor Agency, Inc.;

11 **Case No. 268 877** – Kinghorn, et al. v.  
Universal Studios, Inc., et al.;

12 **Case No. 268 878** – Moriarty, et al. v.  
Viacom Inc., Paramount Studios, Inc.,  
13 et al.;

14 **Case No. 268 880** – Yanok, et al. v.  
Agency for the Performing Arts, Inc.;

15 **Case No. 268 881** – Schwartz, et al. v.  
United Talent Agency, Inc.;

16 **Case No. 268 882** – Shayne, et al. v.  
Viacom Inc. and CBS Broadcasting  
17 Inc.; and

18 **Case No. 268 883** – Kalish, et al. v.  
Viacom Inc., Spelling Entertainment  
19 Inc., et al.

20

21 PAUL C. SPRENGER hereby declares and states:

22 1. I am Lead Class Counsel for plaintiffs in the “TV Writers Cases” and  
23 submit this declaration in support of the Motion for Final Approval of the Settlement and  
24 related relief. I anticipate filing a second declaration in support once the deadlines for  
25 excluding oneself from the Settlement, filing claim forms, and commenting on/objecting  
26 to the Settlement have passed.

27

28

1           2.       I, on behalf of the Settlement Classes and as Trustee of Settlement Fund  
2 II, contracted with Garden City Group, a company that regularly engages in claims  
3 administration work, to administer the claims process in this Settlement. We receive  
4 weekly statistical reports from Lance Blair, a Director of Operations at Garden City who  
5 is in charge of the work at that company with respect to this Settlement.

6           3.       According to a recent report from Mr. Blair, as of April 13, 2010, Garden  
7 City had received 2,483 claim forms, although he informed us that the number included a  
8 small number of supplemental submissions from claimants, so that the actual number of  
9 claim forms was slightly less. The submissions were roughly equally divided from  
10 members of the Professional Television Writer Settlement Class and members of the  
11 Aspiring Television Writers Settlement Class. Because about 600 claim forms were  
12 submitted in connection with the settlement with ICM and Broder Kurland, there are  
13 about twice as many claims from professional writers in connection with this settlement  
14 than the prior one.

15          4.       Under the Settlement, both the Claims Administrator and I are supposed to  
16 receive copies of any comments or objections to the Settlement. To date, we have  
17 received four comments, all positive in nature. We also have received many informal  
18 comments about the Settlement, overwhelmingly positive in nature.

19          5.       Under the Settlement, both the Claims Administrator and I are supposed to  
20 receive copies of any requests from Settlement Class Members to exclude themselves  
21 from the Settlement. To date, the Claims Administrator and I have received 25 requests.  
22 We have tried to contact each to find out the reason for opting out. Upon inquiry, four of  
23 them decided that they erroneously excluded themselves and have withdrawn their  
24 notices. Several of the remaining 21 may not be true opt outs because they may not be  
25 class members: they have not been paid to write for television and apparently disclaim  
26 any interest in writing for television. None of the 21 opt-outs has indicated that the  
27 Settlement did not provide sufficient benefits or was otherwise unfair or inadequate.  
28

