

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF WESTLAND POLICE AND FIRE	:	Civil Action No. 1:12-cv-00256-LAK
RETIREMENT SYSTEM, Individually and on	:	
Behalf of All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	SUPPLEMENTAL DECLARATION OF
	:	ROSS D. MURRAY REGARDING NOTICE
vs.	:	DISSEMINATION AND REQUESTS FOR
	:	EXCLUSION RECEIVED TO DATE
METLIFE INC., et al.,	:	
	:	
Defendants.	:	

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s November 24, 2020 Order Regarding Proposed Settlement Pursuant to Fed. R. Civ. P. 23(e)(1) and Permitting Notice to the Classes (“Notice Order”), Gilardi was appointed to supervise and administer the notice procedure as well as the processing of claims in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”).¹ I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (the “Initial Mailing Declaration”) (ECF No. 412). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE

3. As more fully detailed in the Initial Mailing Declaration, as of January 28, 2021, Gilardi had mailed 434,735 copies of the Court-approved Notice of Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and their nominees. *See* Initial Mailing Declaration, ¶13.

4. Since January 28, 2021, Gilardi has mailed an additional 7,723 copies of the Claim Package in response to additional requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of March 31, 2021, Gilardi has mailed a total of 442,458 Claim Packages to potential Class Members and nominees.

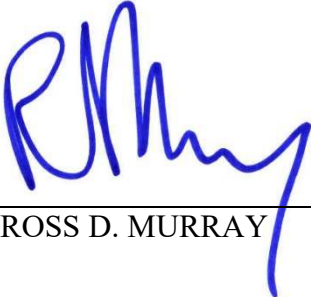
¹ All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated June 8, 2020 (the “Stipulation”) (ECF No 403).

REQUESTS FOR EXCLUSION RECEIVED TO DATE

5. The Notice of Pendency, which was mailed in 2019, informed potential Class Members that written requests for exclusion from the Classes were to be mailed to *MetLife Securities Litigation*, Notice Administrator, c/o Gilardi & Co. LLC, P.O. Box 404152, Louisville, KY 40233-4152, such that they were postmarked no later than September 16, 2019. As reported in the Initial Mailing Declaration, as of January 28, 2021, Gilardi had not received any requests for exclusion from the Classes at this mailing address. See Initial Mailing Declaration, ¶18.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has not received any requests for exclusion.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 31st day of March, 2021, at San Rafael, California.



ROSS D. MURRAY

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 2, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Shawn A. Williams

SHAWN A. WILLIAMS

ROBBINS GELLER RUDMAN
& DOWD LLP

Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
E-mail: ShawnW@rgrdlaw.com

Mailing Information for a Case 1:12-cv-00256-LAK City of Westland Police and Fire Retirement System v. Metlife, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **John Norman Bolus**
jbolus@maynardcooper.com,jatkinson@maynardcooper.com
- **John J. Clarke , Jr**
john.clarke@dlapiper.com,DocketingNewYork@dlapiper.com,new-york-docketing-7871@ecf.pacerpro.com
- **Richard J. Davis**
rdavis@maynardcooper.com,emcpherson@maynardcooper.com
- **Elliot Greenfield**
egreenfield@debevoise.com,dimamura@debevoise.com
- **Daniel C Harkins**
daniel.harkins@dlapiper.com,DocketingNewYork@dlapiper.com,new-york-docketing-7871@ecf.pacerpro.com
- **Maeve L. O'Connor**
moconnor@debevoise.com,mao-ecf@debevoise.com
- **Daniel J. Pfefferbaum**
dpfefferbaum@rgrdlaw.com,dpfefferbaumRGRD@ecf.courtdrive.com
- **Darren J. Robbins**
e_file_sd@rgrdlaw.com
- **Robert M. Rothman**
rrothman@rgrdlaw.com,e_file_ny@rgrdlaw.com,RRothman@ecf.courtdrive.com,e_file_sd@rgrdlaw.com
- **Ellen Anne Gusikoff Stewart**
elleng@rgrdlaw.com
- **John Vukelj**
jvukelj@daypitney.com,john-vukelj-8235@ecf.pacerpro.com,DocketingNewYork@dlapiper.com,new-york-docketing-7871@ecf.pacerpro.com
- **Shawn Anthony Williams**
swilliams@rgrdlaw.com,aelishb@rgrdlaw.com,ShawnW@ecf.courtdrive.com,smorris@rgrdlaw.com,e_file_sd@rgrdlaw.com,smorris@ecf.courtdrive.com
- **Jason Allen Zweig**
jaz@kellerlenkner.com,docket@kellerlenkner.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Thomas C. Michaud