



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

JB AND MARGARET BLAUGRUND
 FOUNDATION,

Plaintiff,

v.

C.A. No. 2021-1094-NAC

GUGGENHEIM FUNDS INVESTMENT
 ADVISORS, LLC, RANDALL C. BARNES,
 ANGELA BROCK-KYLE, THOMAS F.
 LYDON, JR., RONALD A. NYBERG,
 SANDRA G. SPONEM, RONALD E.
 TOUPIN, JR., and AMY J. LEE,

Defendants.

**AFFIDAVIT OF LUIGGY SEGURA IN SUPPORT OF PLAINTIFF’S
 UNOPPOSED MOTION FOR CLASS DISTRIBUTION ORDER**

STATE OF NEW YORK)
) SS:
 COUNTY OF NEW YORK)

I, Luiggy Segura, being duly sworn, deposes and says:

1. I am the Vice President of Securities Class Actions at JND Legal Administration (“JND”). I am over 21 years of age and am not a party to the above-captioned action (the “Action”).¹ I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

¹ Unless otherwise defined in this affidavit (the “Affidavit”), all capitalized terms that are not defined in this Affidavit have the meaning ascribed to them in the Stipulation and Agreement of Settlement, Compromise, and Release, dated March 29, 2024 (the

2. Pursuant to its April 9, 2024 Scheduling Order (Trans. ID 72708003) the Court authorized JND to act as the Settlement Administrator for the Settlement. As more fully described in the Affidavit of Jennifer Ventriglia Regarding (a) Mailing of the Notice; (b) Publication of the Summary Notice; and (c) Establishment of Telephone Helpline and Settlement Website (Trans. ID 73520852), as the Settlement Administrator, JND has implemented the terms of the Settlement by, among other things: (i) mailing the Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear (the “Notice”) to potential Eligible Class Members; (ii) causing the publication of the Summary Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear in *Investor’s Business Daily* and *PR Newswire*; (iii) creating and continuing to maintain a toll-free helpline and a Settlement website to assist potential Eligible Class Members during the course of the administration; and (iv) administering the Settlement in accordance with the terms of the Stipulation.

3. On July 9, 2024, the Court entered the Order and Final Judgment (the “Final Approval Order”) (Trans. ID 73585448), granting final approval of the Settlement and the proposed plan of allocation of the Net Settlement Fund set forth in the Notice (the “Plan of Allocation”). I submit this Affidavit in support of

“Stipulation”) (Trans. ID 72623180).

Plaintiff's motion for a Class Distribution Order, which will, among other things, approve the proposed plan for the distribution of the Net Settlement Fund to Eligible Class Members in accordance with the terms of the Settlement and the Court-approved Plan of Allocation. *See* Notice ¶ 48. The following statements are based on my personal knowledge and information provided by JND employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

MERGER RECORDS

4. Pursuant to the terms of the Court-approved Plan of Allocation, the Net Settlement Fund will be distributed to all Eligible Class Members, *i.e.*, all holders of common shares of Fiduciary/Claymore Energy Infrastructure Fund ("FMO") as of the closing of the merger of FMO with Kayne Anderson Energy Infrastructure Fund ("KYN") on March 7, 2022 (the "Merger"), whose shares were converted into shares of KYN common stock. In accordance with the terms of the Stipulation, the Eligible Class Members do not include any of the Excluded Stockholders. *See* Notice ¶¶ 48-49; Stipulation ¶ 1(f), (dd).

5. Consistent with paragraph 44 of the Notice and the Court-approved Plan of Allocation, Eligible Class Members were not required to file a claim form to receive a distribution from the Net Settlement Fund.

6. On April 11, 2024, JND received a copy of the shareholder register for FMO as of the close of the Merger, identifying all registered holders of FMO

common shares whose shares were converted into shares of KYN common stock (“Registered Holders”). The merger records contain the names, addresses, and number of shares held by each of the Registered Holders. JND consulted with Defendants’ Counsel to confirm the accuracy of the number of shares identified in the merger records. The merger records included 14 Registered Holders, other than Cede & Co. (“Cede”), holding a total of 204.063 FMO common shares at the closing of the Merger, which were converted into common shares of KYN common stock. As none of these Registered Holders were Excluded Stockholders, as discussed in paragraph 8 below, these 14 eligible non-Cede individual record holders’ (“Eligible Record Holders”) held a total of 204.063 FMO common shares at the closing of the Merger that were converted into common shares of KYN common stock. (“Eligible Shares”). *See* Notice ¶ 51.

7. On October 17, 2024, JND also received an allocation report for Cede, the nominee for the Depository Trust & Clearing Company (“DTC”), showing each DTC Participant’s holdings of FMO common shares of beneficial interest held at the closing of the Merger, that were converted into common shares of KYN common stock. JND also consulted with DTC to confirm the accuracy of the number of shares identified in the DTC Position Report. The DTC Position Report contains each DTC Participant’s name, identification number, and the number of shares held by the DTC Participant. The DTC Position Report identified 79 DTC Participants holding a total

of 7,087,943 shares. Excluding the 11,821.172 Excluded Shares described in paragraph 8 below from the total shares, the total number of Eligible Shares held by the ultimate beneficial owner(s) of any Eligible Shares held of record by Cede (“Eligible Beneficial Holders”) (7,076,121.828) added to the total number of Eligible Shares held by non-Cede Eligible Record Holders (204.063) yields 7,076,325.891 total Eligible Shares.

8. Consistent with the terms of the Settlement, Defendants’ Counsel provided JND with information concerning the stockholdings for six (6) of the seven (7) identified Excluded Stockholders. This information reflected a total of 11,821.172 Excluded Shares held by six (6) Excluded Stockholders through DTC Participants. As reflected above, these Excluded Shares are not included in the Eligible Share count. JND has worked to successfully confirm the excluded share amounts for Excluded Stockholders. In addition, Defendants’ Counsel provided a name and phone number for an identified Excluded Stockholder to confirm a set of shares to be excluded, but for which the excluded shareholders report did not verify the Excluded Shares specifically. JND performed multiple outreaches via phone and email to contact the Excluded Stockholder. Public filings show that the Excluded Stockholder held a minimum of 34,333 shares. After numerous discussions with Plaintiff’s Counsel, a minimum of 34,333 shares to be excluded could not be

identified.² These shares are not reflected in JND's calculations described in this paragraph 8.

SETTLEMENT ADMINISTRATION FEES AND DISBURSEMENTS

9. JND agreed to be the Settlement Administrator in exchange for payment of its fees and expenses. Plaintiff's Counsel received regular reports of all the work JND performed with respect to the administration of the Settlement and authorized the administration work performed herein. Attached hereto as Exhibit A are invoices of JND's total fees and expenses for this matter through December 31, 2024, which total \$116,457.25, and JND's estimate of fees and expenses to conduct the initial distribution of the Net Settlement Fund in accordance with the "Distribution Plan" described below, which totals \$48,436.03. To date, JND has received \$46,758.67 for its fees and expenses. Accordingly, there is an outstanding balance of \$118,134.61 payable to JND, which amount includes JND's anticipated fees and expenses for the initial distribution as well as the estimated fee to be paid to DTC for their part of the distribution.

² Specifically, Mr. Quinn Kiley was identified as an Excluded Stockholder but is not listed in the shareholder report. Both Defendants' Counsel and JND made exhaustive efforts to contact Mr. Kiley to obtain shareholder information. Mr. Kiley failed to respond to both Defendants' Counsel and JND. Further, Mr. Kiley's holdings have been identified in public filings. *See e.g.*, Fiduciary/Claymore Energy Infrastructure Fund, Statement of Beneficial Ownership ([Form 4](#)) ([Nov. 27, 2019](#)).

DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND

10. JND will distribute 100% of the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payments approved by the Court on this motion, and after deducting payment of any estimated taxes, the costs of preparing appropriate tax returns, administrative contingencies, and any escrow fees (the “Distribution”), as follows:

a. Consistent with the Court-approved Plan of Allocation and paragraph 52 of the Notice, each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund equal to the product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the “Per-Share Recovery” for the Settlement, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares held by all Eligible Class Members. Based upon the total number of identified Eligible Shares and the estimated Net Settlement Fund available for distribution, the estimated Per-Share Recovery is \$2.0371 per share.

b. Consistent with the Court-approved Plan of Allocation and paragraph 53 of the Notice, payments from the Net Settlement Fund to Eligible Class Members will be made in the same manner in which Eligible Class Members received the Merger consideration.

Accordingly, if an Eligible Class Member's shares were held in "street name" and the Merger consideration was paid into that Eligible Class Member's brokerage account, that Eligible Class Member's broker will be responsible for depositing that Eligible Class Member's Settlement payment into that same brokerage account.

c. Consistent with the Court-approved Plan of Allocation and paragraph 54(i) of the Notice, with respect to Eligible Shares held of record by the DTC, through its nominee Cede, JND will cause that portion of the Net Settlement Fund to be allocated to Eligible Class Members who held their shares through DTC Participants to be paid to DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,³ subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. The DTC Participants and their respective customers, including any intermediaries, will then ensure *pro rata* payment to each Eligible Class Member based on the number of Eligible Shares beneficially owned by such Eligible Beneficial Holder.

³ For each DTC Participant, the "Closing Security Position" is the number of Eligible Shares held by such DTC Participant, as reflected on the DTC Position Report. See Notice n.4.

d. Consistent with the Court-approved Plan of Allocation and paragraph 54(ii) of the Notice, with respect to Eligible Shares held of record as of the Closing other than by Cede (a “Non-Cede Record Position”), as nominee for DTC, JND will make payment from the Net Settlement Fund directly to the Eligible Record Holder of each Non-Cede Record Position in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Non-Cede Record Position.

e. Consistent with the Court-approved Plan of Allocation and paragraph 54(iii) of the Notice, for the avoidance of doubt, any person or entity who purchased Eligible Shares but had not settled those Eligible Shares at the closing of the Merger on March 7, 2022 (“Non-Settled Shares”) *shall be* treated as an Eligible Class Member with respect to those Non-Settled Shares, and a person or entity who sold those Non-Settled Shares on or before the closing of the Merger on March 7, 2022 *shall not be* treated as an Eligible Class Member with respect to those Non-Settled Shares.

f. Consistent with the Court-approved Plan of Allocation and paragraph 54(iv) of the Notice, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not

cashed by the stale date (*i.e.*, more than six months from the check's issue date), the DTC Participants or the holder of a Non-Cede Record Position shall follow their respective policies with respect to further attempted distribution.

g. Consistent with the Court-approved Plan of Allocation and paragraph 54(v) of the Notice, any Class Member that has been informed by the Internal Revenue Service that he, she, or it is subject to backup withholding under the provisions of the Internal Revenue Code must contact the Settlement Administrator at info@FMOSStockholdersLitigation.com to inform the Settlement Administrator that he, she, or it is subject to backup withholding.

h. For the avoidance of doubt, to the extent that any record owner, any DTC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of FMO common shares of beneficial interest as of the closing of the Merger, whose shares were converted into shares of KYN common stock and entitled to payment of the Merger consideration, whether through permitting naked short-selling or the cash settlement of short positions or through any other means ("Increased Merger Consideration Entitlements"), such record owner,

DTC Participants, or their respective customers (including intermediaries) will be responsible for paying to the ultimate beneficial owners of such Increased Merger Consideration Entitlements an amount equal to the Per-Share Recovery times the number of the Increased Merger Consideration Entitlements. Whether DTC, any DTC Participant, or DTC Participants' customers are entitled to receive such funds from any such short-seller is not before this Court.

i. Following the distribution of the Net Settlement Fund to DTC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares.

j. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all Distribution checks will bear a notation "CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE]."

k. All undeliverable or uncashed payments returned to JND by DTC Participants or the holder of a Non-Cede Record Position will be available for further distribution provided that such distribution is economically feasible. At such time as Plaintiff's Counsel, in consultation with JND, determines that further distribution of the funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance of the Net Settlement Fund, after payment of any unpaid fees or expenses incurred in connection with administering the Net Settlement Fund and after the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be contributed to the Combined Campaign for Justice.

l. Paper copies of all supporting documentation may be destroyed one year after the distribution of the Net Settlement Fund, and electronic copies of the same may be destroyed one year after all funds in the Net Settlement Fund have been distributed.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed this 24th day of January, 2025.

Luiggy Segura

Luiggy Segura

Sworn to and subscribed before me this 24 th day of January, 2025.

Savitri Bedasie

Notary Public

State of New York, NASSAU County

My Commission Expires: 10/3/2027

Personally Known or Produced Identification.

Type of Identification Produced:

nydl

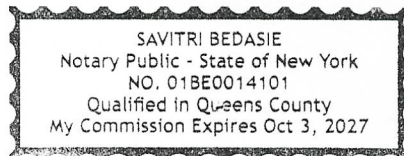


EXHIBIT A

Invoice Date	Invoice Number	Amount
6/27/2024	171947	\$ 66,550.34
8/5/2024	172215	\$ 16,058.66
8/21/2024	172307	\$ 5,619.21
9/17/2024	172524	\$ 2,763.65
10/22/2024	172870	\$ 2,525.49
11/22/224	173040	\$ 4,291.16
12/9/2024	173184	\$ 16,139.88
1/8/2025	173879	\$ 2,508.86
11/22/224	Distribution Estimate (173041)	\$ 48,436.03

Total	\$ 164,893.28
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**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
6/27/2024	171947

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - May 31, 2024)		
	FEES:		
1	Initial Project and Database Set-Up Fee	7,500.00	7,500.00
1	IVR Set-Up Fee	1,900.00	1,900.00
3	IVR Maintenance Fee	50.00	150.00
128.67	IVR Use/minute	0.32	41.17
3	Website Hosting	155.00	465.00
5	Forms Set-up	160.00	800.00
21.75	Mailing Coordination	100.00	2,175.00
6.5	Address Trace	160.00	1,040.00
8	Broker Mailing (not including broker fees)	100.00	800.00
8.75	Summary Notice "Production Costs"	295.00	2,581.25
22.25	Director	210.00	4,672.50
9.25	Network Administrator	210.00	1,942.50
17.75	Senior Project Manager Working with financial Institutions and Brokers	160.00	2,840.00
18.75	Senior Data Analyst	160.00	3,000.00
5.25	Data Analyst	135.00	708.75
38	Project Manager	135.00	5,130.00
7.5	Assistant Project Manager	100.00	750.00
15.75	Contact Center Agent	65.00	1,023.75
20,000	Print 20-page Notice Packet	0.61	12,200.00
1	Investor's Business Daily	4,400.00	4,400.00
1	US1 National Newslne	3,945.00	3,945.00
		Invoice Total	
			Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

DATE	INVOICE #
6/27/2024	171947

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	EXPENSES:		
3	PO Box	175.00	525.00
871	Electronic Storage	0.006	5.23
	Broker Reimbursement	985.00	985.00
	FedEx	320.00	320.00
82	Copy Charges	0.25	20.50
	Domain Charges	692.23	692.23
	Postage	5,937.46	5,937.46

Invoice Total	\$66,550.34
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
8/5/2024	172215

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
135.1	IVR Use/minute	0.32	43.23
1	Website Hosting	155.00	155.00
8.25	Mailing Coordination	100.00	825.00
1.25	Address Trace	160.00	200.00
4.25	Broker Mailing (not including broker fees)	100.00	425.00
1	Senior Executive	650.00	650.00
3.25	Director	210.00	682.50
1.75	Senior Project Manager Working with financial Institutions and Brokers	160.00	280.00
1.5	Senior Data Analyst	160.00	240.00
1.25	Data Analyst	135.00	168.75
19.75	Project Manager	135.00	2,666.25
1.25	Assistant Project Manager	100.00	125.00
4.5	Contact Center Agent	65.00	292.50
	EXPENSES:		
1	PO Box	175.00	175.00
892	Electronic Storage	0.006	5.35
	Broker Reimbursement	8,900.28	8,900.28
136	Copy Charges	0.25	34.00
	Postage	140.80	140.80

Invoice Total \$16,058.66

Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1201 2nd Ave., Suite 3400
 Seattle, WA 98101
 800.207.7160
 accounting@classactionadmin.com
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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
8/21/2024	172307

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
93.81	IVR Use/minute	0.32	30.02
1	Website Hosting	155.00	155.00
2	Mailing Coordination	100.00	200.00
0.5	Senior Executive	650.00	325.00
8.5	Director	210.00	1,785.00
2.75	Senior Project Manager Working with financial Institutions and Brokers	160.00	440.00
0.5	Senior Data Analyst	160.00	80.00
11.75	Project Manager	135.00	1,586.25
4.25	Contact Center Agent	65.00	276.25
0.5	Website Set-Up and Design Fee	135.00	67.50
	EXPENSES:		
1	PO Box	175.00	175.00
925	Electronic Storage	0.006	5.55
	Broker Reimbursement	428.04	428.04
7	Copy Charges	0.25	1.75
	Postage	13.85	13.85

Invoice Total	\$5,619.21
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
9/17/2024	172524

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
14.03	IVR Use/minute	0.32	4.49
1	Website Hosting	155.00	155.00
0.75	Mailing Coordination	100.00	75.00
3.25	Director	210.00	682.50
1.5	Senior Project Manager Working with financial Institutions and Brokers	160.00	240.00
8.25	Project Manager	135.00	1,113.75
4	Contact Center Agent	65.00	260.00
	EXPENSES:		
1	PO Box	175.00	175.00
941	Electronic Storage	0.006	5.65
	Postage	2.26	2.26

Invoice Total	\$2,763.65
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
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Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
10/22/2024	172870

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
46.38	IVR Use/minute	0.32	14.84
1	Website Hosting	155.00	155.00
3	Director	210.00	630.00
1.5	Senior Project Manager Working with financial Institutions and Brokers	160.00	240.00
7.25	Project Manager	135.00	978.75
4.25	Contact Center Agent	65.00	276.25
	EXPENSES:		
1	PO Box	175.00	175.00
941	Electronic Storage	0.006	5.65

Invoice Total	\$2,525.49
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
11/22/2024	173040

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
1	Website Hosting	155.00	155.00
6	Director	210.00	1,260.00
0.25	Network Administrator	210.00	52.50
1.5	Assistant Director	180.00	270.00
2	Senior Project Manager Working with financial Institutions and Brokers	160.00	320.00
0.75	Senior Data Analyst	160.00	120.00
12.5	Project Manager	135.00	1,687.50
3	Contact Center Agent	65.00	195.00
1	Advance Address Updates	0.05	0.05
	EXPENSES:		
1	PO Box	175.00	175.00
1,019	Electronic Storage	0.006	6.11

Invoice Total	\$4,291.16
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1201 2nd Ave., Suite 3400
 Seattle, WA 98101
 800.207.7160
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
12/9/2024	173184

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
1	Website Hosting	155.00	155.00
1.25	Handling General Communications and Processing Exclusion Requests	100.00	125.00
17.5	Director	210.00	3,675.00
2.75	Senior Project Manager	160.00	440.00
16.25	Project Manager	135.00	2,193.75
	EXPENSES:		
1	PO Box	175.00	175.00
1,021	Electronic Storage	0.006	6.13
	DTCC Processing Fee	9,320.00	9,320.00

Invoice Total	\$16,139.88
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1201 2nd Ave., Suite 3400
 Seattle, WA 98101
 800.207.7160
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
1/8/2025	173879

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2024)		
	FEES:		
1	IVR Maintenance Fee	50.00	50.00
31.97	IVR Minutes	0.32	10.23
0.25	Contact Center Agent	65.00	16.25
1	Website Hosting	155.00	155.00
1.5	Handling General Communications and Processing Exclusion Requests	100.00	150.00
5.25	Director	210.00	1,102.50
6.25	Project Manager	135.00	843.75
	EXPENSES:		
1	PO Box	175.00	175.00
1,021	Electronic Storage	0.006	6.13

Invoice Total	\$2,508.86
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Total Balance Due



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1201 2nd Ave., Suite 3400
Seattle, WA 98101
800.207.7160
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossman 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
11/22/2024	173041

PROJECT	TERMS
FMO - Fiduciary Claymore Merger Litigatio	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Distribution Estimate (Assumes 9 Months)		
	FEES		
40	Check Printing, including reissues	0.21	8.40
50	Wire Process	160.00	8,000.00
25	Director	210.00	5,250.00
5	Assistant Director	180.00	900.00
40	Senior Project Manager Working with Financial Institutions and Brokers	160.00	6,400.00
55	Project Manager	135.00	7,425.00
40	Account Management and Reconciliation	160.00	6,400.00
1,000	IVR Minutes	0.32	320.00
20	Contact Center Services	65.00	1,300.00
35	Handling general communications	100.00	3,500.00
9	IVR Maintenance Fee	50.00	450.00
9	Website Monthly Maintenance Fee	155.00	1,395.00
1	OFAC Search	5,000.00	5,000.00
	EXPENSES		
40	Check Postage, including reissues	0.69	27.60
9,171	Electronic Storage	0.006	55.03
	Supplies	150.00	150.00
	FedEx	75.00	75.00
100	Copy Charges	0.25	25.00
9	PO Box	195.00	1,755.00

Invoice Total \$48,436.03

Total Balance Due