

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

IN RE SPECTRUM BRANDS SECURITIES LITIGATION )  
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 ) No. 19-cv-347-jdp  
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**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA REGARDING:  
(A) MAILING OF THE NOTICE AND CLAIM FORM AND (B) REPORT ON  
REQUESTS FOR EXCLUSION AND CLAIM FORMS RECEIVED**

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I, Luiggy Segura, hereby declare under penalty of perjury as follows:

1. I am the Senior Director of Securities Class Actions at JND Legal Administration (“JND”). Pursuant to the Court’s Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement entered November 17, 2021 (dkt. 98) (the “Preliminary Approval Order”), Lead Counsel was authorized to retain JND as the Claims Administrator in connection with the Settlement of the above-captioned action (the “Action”).<sup>1</sup> I submit this Declaration as a supplement to my earlier declaration, the Declaration of Luiggy Segura Regarding: (A) Mailing of the Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received to Date, dated February 7, 2022 (dkt. 104-4, 108) (the “Initial Mailing Declaration”). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.

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<sup>1</sup> Unless otherwise defined in this declaration, all capitalized terms have the meanings defined in the Stipulation and Agreement of Settlement dated August 27, 2021 (dkt. 96-1).

**CONTINUED MAILING OF THE NOTICE PACKET**

2. Since the execution of my Initial Mailing Declaration, JND has continued to disseminate copies of the Notice and Claim Form (together, the “Notice Packet”) in response to additional request from potential Spectrum Class Members and nominees. As of the date of this Declaration, JND has mailed a total of 90,591 Notice Packets to potential Spectrum Class Members and nominees.

**TELEPHONE HELPLINE AND WEBSITE**

3. JND continues to maintain the toll-free telephone helpline (1-833-674-0176) and interactive voice response system to accommodate inquiries from Spectrum Class Members. JND also continues to maintain the dedicated website for the Action ([www.SpectrumBrandsSecuritiesLitigation.com](http://www.SpectrumBrandsSecuritiesLitigation.com)) in order to assist Spectrum Class Members. On February 8, 2022, JND posted to the Settlement website copies of the papers filed in support of Lead Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation and Lead Counsel’s Motion for an Award of Attorneys’ Fees and Litigation Expenses. JND will continue to maintain and, as appropriate, update the Settlement website and toll-free telephone helpline until the conclusion of this administration.

**REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

4. The Notice informed potential members of the Spectrum Class that requests for exclusion from the Spectrum Class were to be sent to the Claims Administrator, such that they were received no later than February 22, 2022. The Notice also sets forth the information that must be included in each request for exclusion. As of the date of this Declaration, JND has received only one request for exclusion, from an individual investor, Janice M. Yarbrough, who

had previously submitted a request for exclusion in connection with the Prior Settlement, and thus was already excluded from the Spectrum Class by definition. *See* Stipulation ¶ 1(yy) (dkt. 96-1).

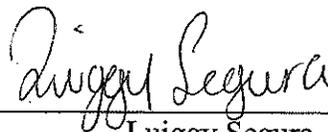
### **REPORT ON CLAIMS RECEIVED TO DATE**

5. The Notice informed potential members of the Spectrum Class that if they wished to participate in the Settlement they must submit a Claim Form to JND, with supporting documentation, postmarked or received by January 25, 2022, but, however, that they did not need to submit another Claim Form if they had previously submitted a Claim Form in connection with the Prior Settlement. As of February 28, 2022, JND has received approximately 29,254 claims. This claim count may increase if JND receives late claims that would not delay a future distribution. Lead Counsel has the discretion to accept late claims for processing provided such acceptance does not delay the distribution of the Net Settlement Fund to the Spectrum Class. *See* Preliminary Approval Order ¶ 11.

6. Of the claims received, 26,798 were filed electronically and approximately 2,456 claims were submitted by mail. Based on our review of these claims to date, the claims received represent approximately 32,342,837 Spectrum Brands shares that were damaged as a result of the alleged fraud (*i.e.*, shares which calculated to a Recognized Claim under the Plan of Allocation). JND will be conducting a review of claims for deficiencies, providing claimants with an opportunity to correct any deficiencies, conducting thorough quality control and quality assurance processes, and performing fraud prevention reviews as part of its normal claims processing procedures in order to ensure the validity and accuracy of claims. As a result of these processes and the possible acceptance of additional claims, the number of damaged shares in the Claim Forms received is subject to change.

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

Executed on March 3, 2022.

  
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Luigy Segura

**CERTIFICATE OF SERVICE**

I, Katherine M. Sinderson, an attorney, hereby certify that a copy of the foregoing **“Supplemental Declaration of Luiggy Segura Regarding: (A) Mailing of the Notice and Claim Form and (B) Report on Requests for Exclusion and Claim Forms Received”** was served on counsel for all parties electronically via the CM/ECF system on March 4, 2022.

Dated: March 4, 2022

By: /s/ Katherine M. Sinderson  
Katherine M. Sinderson