



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

IN RE VIACOM INC.  
STOCKHOLDERS LITIGATION

Consolidated  
C.A. No. 2019-0948-SG

**PLAINTIFFS' UNOPPOSED MOTION  
FOR CLASS DISTRIBUTION ORDER**

PLEASE TAKE NOTICE THAT Lead plaintiff California Public Employees' Retirement System ("CalPERS" or "Lead Plaintiff"), on behalf of itself and the Settlement Class and Additional Plaintiffs Park Employees' and Retirement Board Employees' Annuity and Benefit Fund of Chicago ("Chicago Park") and Louis Wilen (collectively, "Plaintiffs"), respectfully move this Court to enter the accompanying Class Distribution Order pursuant to the terms of the Stipulation and Agreement of Compromise, Settlement, and Release (the "Stipulation") (Trans. ID 69679292) and the Court's Order and Final Judgment (Trans. ID 70476002) and submits in support of this motion the accompanying Affidavit of Jack Ewashko in Support of Plaintiffs' Unopposed Motion for Class Distribution Order (the "Ewashko Affidavit") submitted by the Court-approved Settlement Administrator,

A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”).<sup>1,2</sup> If approved by the Court, the Class Distribution Order will, *inter alia*:

1. Direct A.B. Data to distribute 100% of the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payment of A.B. Data’s fees and expenses requested in this motion, and after deducting payment of any estimated taxes, the costs of preparing appropriate tax returns, administrative contingencies, and any escrow fees, as set forth in paragraph 10 of the Ewashko Affidavit (the “Distribution”).

2. Consistent with ¶ 33 of the Court-approved Plan of Allocation stated in the Notice disseminated to Class Members, direct that each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund in connection with the Distribution 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

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<sup>1</sup> Pursuant to the Court’s Scheduling Order (Trans. ID 69844241), the Court authorized A.B. Data to act as the Settlement Administrator in connection with the Settlement of this Action.

<sup>2</sup> Plaintiffs incorporate by reference the definitions in the Stipulation and the Ewashko Affidavit, and all capitalized terms used herein shall have the same meanings as set forth in the Stipulation and/or the Ewashko Affidavit.

by the total number of Eligible Shares held by all Eligible Class Members. (Ewashko Affidavit ¶ 10(a)).

3. Consistent with ¶ 34 of the Plan of Allocation, 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 Eligible Shares were held in “street name” and the Merger Consideration was deposited into an 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. (Ewashko Affidavit ¶ 10(b)).

4. Consistent with ¶ 35(i) of the Plan of Allocation, with respect to Eligible Shares held of record at the Closing by DTC, through its nominee Cede, A.B. Data shall distribute that portion of the Net Settlement Fund among the DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,<sup>3</sup> using the same mechanism that DTC used to distribute the Merger Consideration and subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. (Ewashko Affidavit ¶ 10(c)). The DTC Participants and their respective customers, including any intermediaries, shall then ensure *pro rata* payment to each Eligible

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<sup>3</sup> For each DTC Participant, the “Closing Security Position” is the number of Eligible Shares reflected on the DTC allocation report used by DTC to distribute the Merger Consideration. *See* Notice n.4.

Class Member based on the number of Eligible Shares beneficially owned by such Eligible Class Member at the time such Eligible Shares were exchanged for the Merger Consideration. (*Id.*).

5. Consistent with ¶ 35(ii) of the Plan of Allocation, with respect to Eligible Shares held of record as of the Closing other than by Cede, as nominee for DTC (a “Closing Non-Cede Record Position”), direct A.B. Data to make payment from the Net Settlement Fund directly to the Eligible Closing Date Record Holder of each Closing Non-Cede Record Position in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Closing Non-Cede Record Position. (Ewashko Affidavit ¶ 10(d)).

6. Consistent with ¶ 33(iii) of the Plan of Allocation, direct that any person or entity who purchased Eligible Shares but had not settled those Eligible Shares at the Closing (December 4, 2019) (“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 shall not be treated as an Eligible Class Member with respect to those Non-Settled Shares. (Ewashko Affidavit ¶ 10(e)).

7. Consistent with ¶ 35(iv) of the Plan of Allocation, 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 Closing Non-Cede Record Position shall follow their respective policies with respect to further attempted distribution or escheatment. (Ewashko Affidavit ¶ 10(f)).

8. All undeliverable or uncashed payments returned to A.B. Data by DTC Participants or the holder of a Closing Non-Cede Record Position shall be available for further distribution provided that such distribution is economically feasible. At such time as Lead Counsel, in consultation with A.B. Data, 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. (Ewashko Affidavit ¶ 10(g)).

9. 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. (Ewashko Affidavit ¶ 10(h)).

10. 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].” (Ewashko Affidavit ¶ 10(i)).

11. Authorize the destruction of paper copies of all supporting documentation one year after the distribution of the Net Settlement Fund, and the destruction of electronic copies of the same one year of documentation after all funds in the Net Settlement Fund have been distributed. (Ewashko Affidavit ¶ 10(j)).

12. Direct that payment pursuant to the Class Distribution Order shall be final and conclusive against all Eligible Closing Date Stockholders, and release and discharge all Persons involved in the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund, from any and all claims arising out of such involvement, and bar all Class Members, whether or not they receive payment from the Net Settlement Fund, from making any further claims against the Net Settlement Fund, Plaintiffs, Plaintiffs’ Counsel, the Settlement Administrator (A.B. Data), or any other agent retained by Plaintiffs or Plaintiffs’ Counsel in connection with the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund beyond the amounts allocated to Eligible Closing Date Stockholders.

13. Approve all of A.B. Data’s fees and expenses incurred in connection with the administration of the Settlement and estimated to be incurred in connection

with the distribution of the Net Settlement Fund as set forth in Exhibit A to the Ewashko Affidavit and authorize Lead Counsel to direct payment out of the Settlement Fund to A.B. Data in payment of any such outstanding fees and expenses.

14. Retain jurisdiction to consider any further applications concerning the administration of the Settlement, and such other and further relief as the Court deems appropriate.

Dated: December 4, 2024

OF COUNSEL:

Jeroen van Kwawegen  
Jeremy P. Robinson  
Edward G. Timlin  
**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**  
1251 Avenue of the Americas  
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(212) 554-1400

**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

/s/ Andrew E. Blumberg  
Gregory V. Varallo (Bar No. 2242)  
Andrew E. Blumberg (Bar No. 6744)  
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(302) 364-3600

**WORDS: 1,353 (of 3,000 Word Limit)**

**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

IN RE VIACOM INC.  
STOCKHOLDERS LITIGATION

Consolidated  
C.A. No. 2019-0948-SG

**[PROPOSED] CLASS DISTRIBUTION ORDER**

The Court, having considered Plaintiffs' Unopposed Motion for Class Distribution Order (the "Motion"), and for good cause shown, IT IS HEREBY ORDERED that:

1. The Motion is GRANTED.
2. The Settlement Administrator shall implement the proposed Plan of Distribution as described in the Motion.

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
Vice Chancellor Sam Glasscock III





**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

IN RE VIACOM INC.  
STOCKHOLDERS LITIGATION

Consolidated  
C.A. No. 2019-0948-SG

**AFFIDAVIT OF JACK EWASHKO IN SUPPORT OF PLAINTIFFS’  
UNOPPOSED MOTION FOR CLASS DISTRIBUTION ORDER**

STATE OF WISCONSIN )  
 ) ss.:  
COUNTY OF MILWAUKEE )

I, Jack Ewashko, being duly sworn, deposes and says:

1. I am a Director of Case Management of A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”), whose Corporate Office is located in Milwaukee, Wisconsin. I am over 21 years of age and am not a party to the above-captioned action (the “Action”).<sup>1</sup> I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. Pursuant to its April 18, 2023 Scheduling Order (Trans. ID 69844241) the Court authorized A.B. Data to act as the Settlement Administrator for the Settlement. As more fully described in the Affidavit of Jack Ewashko Regarding Mailing and Publication of Notice (Trans. ID 70403695), as the Settlement

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<sup>1</sup> 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 28, 2023 (the “Stipulation”) (Trans. ID 69679292).

Administrator, A.B. Data 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 *Wall Street Journal* 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 25, 2023, the Court entered the Order and Final Judgment (the “Final Approval Order”) (Trans. ID 70476002), 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 Plaintiffs’ 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 ¶ 29. The following statements are based on my personal knowledge and information provided by A.B. Data 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<sup>2</sup>—i.e., all holders of Viacom common stock at any time from August 13, 2019 through and including December 4, 2019, whether beneficial or of record, including the legal representatives, heirs, successors-in-interest, transferees, and assignees of all such foregoing holders—who received the merger consideration. In accordance with terms of the Stipulation, the Eligible Class Members do not include any of the Excluded Stockholders. *Id.*, See Stipulation ¶ 1(nn).

5. Under the terms of the Plan of the Allocation, Eligible Class Members were not required to file a claim form to receive distribution from the Settlement. Instead, distributions from the Net Settlement Fund will be paid to Eligible Class Members based upon the Merger Records provided to A.B. Data by Lead Counsel. *See Notice at ¶ 25.*

6. On September 8, 2023, A.B. Data received a copy of the Merger Records identifying all registered holders of Eligible Shares who held shares of Viacom common stock at the Closing of the Merger, i.e., December 4, 2019

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<sup>2</sup> The Settlement Class is a non-“opt-out” class pursuant to Delaware Court of Chancery Rules 23(a), 23(b)(1), and 23(b)(2). Accordingly, Class Members do not have the right to exclude themselves from the Settlement Class. *See Notice at page 5.*

(“Registered Holders”). The Merger Records contain the names, addresses, and number of shares held by each of the Registered Holders. The Merger Records identified 17,949 Registered Holders, holding a total of 403,614,011 shares (49,428,986 Class A shares and 354,185,025 Class B shares) of Viacom common stock outstanding at the Closing. Cede & Co. (“Cede”) held 374,429,187 on behalf of beneficial owners. Of the 29,184,824 shares held by non-Cede record holders, 25,928,949 were held by excluded stockholders National Amusements Inc., NAI Entertainment Holdings LLC, and Viacom Control Escheatment. A.B. Data identified 17,747 eligible non-Cede record holders holding 3,255,875 Eligible Shares (the “Eligible Closing Date Record Holders”).

7. A.B. Data also received DTC Allocation Reports from Cede, as nominee for the Depository Trust & Clearing Company (“DTC”), showing each DTC Participant’s holdings of Viacom common stock at the Closing. A.B. Data consulted with DTC to confirm the accuracy of the number of shares identified in the Merger Records. The DTC Allocation Report contains each DTC Participant’s name, identification number, and the number of shares held by the DTC Participant. The DTC Allocation Reports identified 199 DTC Participants holding a total of 374,429,187 shares of Viacom common stock (comprised of 23,455,056 Class A shares added to 350,974,131 Class B shares). 14,017,958 shares were held on behalf of excluded stockholders, including National Amusements Inc. (6,053,845 shares)

and National Entertainment Holdings LLC (7,831,654 shares). Accounting for the additional 14,017,958 Excluded Shares indicated in the Allocation Report and described in paragraph 8 below, the total of Eligible Shares held by the ultimate beneficial owner(s) of any Eligible Shares held of record by Cede (“Eligible Closing Date Beneficial Holders”) (360,411,229) added to the total of Eligible Shares held by Eligible Closing Date Record Holders (3,255,875) calculate to 363,667,104 total Eligible Shares.

8. Consistent with the terms of the Settlement, Defendants’ Counsel provided A.B. Data with information concerning the stockholdings of the identified Excluded Stockholders. This information corroborated a total of 39,946,907 Excluded Shares held by Excluded Stockholders comprised of excluded shares from the Merger Records (25,928,949) and DTC Allocation Report (14,017,958).

**SETTLEMENT ADMINISTRATION FEES AND DISBURSEMENTS**

9. A.B. Data agreed to be the Settlement Administrator in exchange for payment of its fees and expenses. Lead Counsel received regular reports of all the work A.B. Data performed with respect to the administration of the Settlement and authorized the administration work performed herein. Attached hereto as Exhibit A are invoices of A.B. Data’s total fees and expenses for this matter through November 21, 2024, which total \$454,113.72 and A.B. Data’s estimate of fees and expenses to conduct the initial distribution of the Net Settlement Fund in accordance with the

“Distribution Plan” described below (\$53,643.40). To date, A.B. Data has been paid \$202,827.37 for its fees and expenses. Accordingly, there is an outstanding balance of \$304,929.75 payable to A.B. Data, which amount includes A.B. Data’s anticipated fees and expenses for the initial distribution.

**DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND**

10. A.B. Data 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 ¶ 33 of the Court-approved Plan of Allocation, each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund in connection with the Distribution 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 \$0.25 per share, exclusive of a reserve held to address administrative contingencies.

b. Consistent with ¶ 34 of the Plan of Allocation, 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 Eligible Shares were held in "street name" and the Merger Consideration was deposited 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 ¶ 35(i) of the Plan of Allocation, with respect to Eligible Shares held of record at the Closing by DTC, through its nominee Cede, A.B. Data will be directed to distribute that portion of the Net Settlement Fund to be allocated to Eligible Class Members who held their Eligible Shares through DTC Participants to be paid to the DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,<sup>3</sup> using the same mechanism that DTC used to distribute the Merger Consideration and 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

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<sup>3</sup> For each DTC Participant, the "Closing Security Position" is the number of Eligible Shares reflected on the DTC allocation report used by DTC to distribute the Merger Consideration. *See* Notice at footnote 4.

any intermediaries, shall then ensure *pro rata* payment to each Eligible Class Member based on the number of Eligible Shares beneficially owned by such Eligible Class Member at the time such Eligible Shares were exchanged for the Merger Consideration.

d. Consistent with ¶ 35 (ii) of the Plan of Allocation, with respect to Eligible Shares held of record as of the Closing other than by Cede, as nominee for DTC (a “Closing Non-Cede Record Position”), A.B. Data will make payment from the Net Settlement Fund directly to the Eligible Closing Date Record Holder of each Closing Non-Cede Record Position in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Closing Non-Cede Record Position.

e. Consistent with ¶ 35(iii) of the Plan of Allocation, for the avoidance of doubt, any person or entity who purchased Eligible Shares but had not settled those Eligible Shares at the Closing (December 4, 2019) (“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 shall not be treated as an Eligible Class Member with respect to those Non-Settled Shares.

f. Consistent with ¶ 35(iv) of the Plan of Allocation, 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 Closing Non-Cede Record Position shall follow their respective policies with respect to further attempted distribution or escheatment.

g. All undeliverable or uncashed payments returned to A.B. Data by DTC Participants or the holder of a Closing Non-Cede Record Position shall be available for further distribution provided that such distribution is economically feasible. At such time as Lead Counsel, in consultation with A.B. Data, 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.

h. 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.

i. 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].”

j. 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 4<sup>th</sup> day of December, 2024.



JACK EWASHKO

Sworn to and subscribed before me this 4th day of December, 2024.



Noah T. Fenner

Noah Fenner  
Online Notary Public  
Wisconsin  
Milwaukee  
Commission #: 249319  
Commission Expires: 2026-08-29

Notarized online using audio-video communication

My commission expires August 29, 2026.

# EXHIBIT A

# INVOICES



## VIACOM INC. STOCKHOLDERS LITIGATION

Invoice Date	Invoice Number	Amount
May-23	4927	\$84,485.69
June-23	5084	\$118,341.68
July-23	5092	\$6,341.71
August-23	5341	\$133,669.80
September-23	5404	\$5,637.71
October-23	5569	\$3,316.41
November-23	5735	\$3,867.46
December-23	5827	\$5,322.56
January-24	5972	\$3,817.06
February-24	6120	\$8,316.56
March-24	6277	\$7,256.46
April-24	6438	\$6,581.13
May-24	6552	\$8,136.86
June-24	6758	\$5,858.96
July-24	6896	\$3,262.61
August-24	7081	\$33,935.24
September-24	7244	\$6,737.66
October-24	4705	\$9,228.16
Estimate to Complete (Initial Distribution)		\$53,643.40
<b>Total</b>		<b>\$507,757.12</b>

**A.B. DATA, LTD.**

**Class Action Administration**

600 A. B. Data Drive  
Milwaukee, WI 53217  
414-961-7523  
accounting@abdataclassaction.com  
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP  
1251 AVENUE OF THE AMERICAS, 44TH  
FLOOR  
NEW YORK, NY, 10020  
USA

**INVOICE** INV000304927  
**PAGE** 1/1  
**DATE** 5/31/2023  
**CLIENT** 107125

**INVOICE**

**JOB 54705 Viacom Inc.**

<b>DESCRIPTION</b>	<b>QTY</b>	<b>PRICE</b>	<b>AMOUNT</b>
Project/Database Setup (One-Time Fee)	1	5,000.00	\$5,000.00
Toll-Free Telephone Line Setup (One-Time Fee)	1	1,250.00	\$1,250.00
Project Management (Hourly)	35.00	185.00	\$6,475.00
System Support (Hourly)	20.25	195.00	\$3,948.75
Quality Assurance (Hourly)	1.50	170.00	\$255.00
Staff (Hourly)	18.00	110.00	\$1,980.00
Printing and Mailing of Notice Packets	50,000	0.6457	\$32,285.00
Media Notice - PR Newswire	1	4,043.75	\$4,043.75
Media Notice - Dow Jones	1	24,543.64	\$24,543.64
Interactive Voice Response (IVR) (Per Minute)	139	0.50	\$69.50
CSRs/Live Operators (Per Hour)	3.50	75.00	\$262.50
800 Number Charges (Per Minute)	207	0.15	\$31.05
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Post Office Box Rental/Renewal	1	1,480.00	\$1,480.00
Bank, Broker, and Nominee Fulfillment Expenses	1	336.50	\$336.50
Receipt, Processing of Bank/Broker/Nominee Lists for Mailing	12	185.00	\$2,220.00
Market Research (One Time Fee)	1	100.00	\$100.00

**TOTAL \$84,485.69**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

**A.B. DATA, LTD.**

**Class Action Administration**

600 A. B. Data Drive  
Milwaukee, WI 53217  
414-961-7523  
accounting@abdataclassaction.com  
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP  
1251 AVENUE OF THE AMERICAS, 44TH  
FLOOR  
NEW YORK, NY, 10020  
USA

**INVOICE**

**INVOICE** INV000305084  
**PAGE** 1/1  
**DATE** 6/30/2023  
**CLIENT** 107125

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Remailing of Notice Packets to Updated Addresses	150	1.25	\$187.50
Website Setup and Design (One-Time Fee)	1	2,000.00	\$2,000.00
Project Management (Hourly)	15.50	185.00	\$2,867.50
Staff (Hourly)	16.00	110.00	\$1,760.00
Printing and Mailing of 16 pg Notice Packets	200,000	0.3600	\$72,000.00
Postage	1	25,668.16	\$25,668.16
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	51	0.50	\$25.50
CSRs/Live Operators (Per Hour)	2.00	75.00	\$150.00
800 Number Charges (Per Minute)	194	0.15	\$29.10
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Bank, Broker, and Nominee Fulfillment Expenses	1	12,693.54	\$12,693.54
Receipt, Processing of Bank/Broker/Nominee Lists for Mailing	3	185.00	\$555.00
Electronic Storage (Per Page/Per Month)	19	0.02	\$0.38

**TOTAL \$118,341.68**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

**A.B. DATA, LTD.**

**Class Action Administration**

600 A. B. Data Drive  
Milwaukee, WI 53217  
414-961-7523  
accounting@abdataclassaction.com  
abdataclassaction.com



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USA

**INVOICE**

<b>INVOICE</b>	INV000305092
<b>PAGE</b>	1/1
<b>DATE</b>	7/26/2023
<b>CLIENT</b>	107125

**JOB 54705 Viacom Inc.**

<b>DESCRIPTION</b>	<b>QTY</b>	<b>PRICE</b>	<b>AMOUNT</b>
Project Management (Hourly)	12.25	185.00	\$2,266.25
System Support (Hourly)	0.50	195.00	\$97.50
Staff (Hourly)	11.75	110.00	\$1,292.50
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	372	0.50	\$186.00
CSRs/Live Operators/Correspondence Processing (Hourly)	16.50	75.00	\$1,237.50
800 Number Charges (Per Minute)	714	0.15	\$107.10
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Advanced Address Updates	681	1.10	\$749.10
Electronic Storage (Per Page/Per Month)	38	0.02	\$0.76

**TOTAL \$6,341.71**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

**A.B. DATA, LTD.**

**Class Action Administration**

600 A. B. Data Drive  
Milwaukee, WI 53217  
414-961-7523  
accounting@abdataclassaction.com  
abdataclassaction.com



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**INVOICE**

**INVOICE** INV000305341  
**PAGE** 1/1  
**DATE** 8/31/2023  
**CLIENT** 107125

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Remailing of Notice Packets to Updated Addresses	13	1.25	\$16.25
Project Management (Hourly)	11.00	185.00	\$2,035.00
Staff (Hourly)	10.75	110.00	\$1,182.50
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	136	0.50	\$68.00
CSRs/Live Operators/Correspondence Processing (Hourly)	3.00	75.00	\$225.00
800 Number Charges (Per Minute)	311	0.15	\$46.65
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Advanced Address Updates	94	1.10	\$103.40
Bank, Broker, and Nominee Fulfillment Expenses	1	129,587.04	\$129,587.04
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$133,669.80**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT



**A.B. DATA, LTD.**

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**INVOICE**

<b>INVOICE</b>	INV000305404
<b>PAGE</b>	1/1
<b>DATE</b>	9/28/2023
<b>CLIENT</b>	107125

**JOB 54705 Viacom Inc.**

<b>DESCRIPTION</b>	<b>QTY</b>	<b>PRICE</b>	<b>AMOUNT</b>
Executive Project Management (Hourly)	6.00	240.00	\$1,440.00
Project Management (Hourly)	19.25	185.00	\$3,561.25
Staff (Hourly)	0.50	110.00	\$55.00
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	54	0.50	\$27.00
CSRs/Live Operators/Correspondence Processing (Hourly)	1.75	75.00	\$131.25
800 Number Charges (Per Minute)	115	0.15	\$17.25
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$5,637.71**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

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Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

**A.B. DATA, LTD.**

**Class Action Administration**

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**INVOICE**

<b>INVOICE</b>	INV000305569
<b>PAGE</b>	1/1
<b>DATE</b>	10/30/2023
<b>CLIENT</b>	107125

**JOB 54705 Viacom Inc.**

<b>DESCRIPTION</b>	<b>QTY</b>	<b>PRICE</b>	<b>AMOUNT</b>
Senior Project Management (Hourly)	7.00	225.00	\$1,575.00
Project Management (Hourly)	5.75	185.00	\$1,063.75
Staff (Hourly)	0.50	110.00	\$55.00
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	68	0.50	\$34.00
CSRs/Live Operators/Correspondence Processing (Hourly)	2.25	75.00	\$168.75
800 Number Charges (Per Minute)	93	0.15	\$13.95
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$3,316.41**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

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400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

**A.B. DATA, LTD.**

**Class Action Administration**

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**INVOICE**

<b>INVOICE</b>	INV000305735
<b>PAGE</b>	1/1
<b>DATE</b>	11/30/2023
<b>CLIENT</b>	107125

**JOB 54705 Viacom Inc.**

<b>DESCRIPTION</b>	<b>QTY</b>	<b>PRICE</b>	<b>AMOUNT</b>
Senior Project Management (Hourly)	11.00	225.00	\$2,475.00
Project Management (Hourly)	4.00	185.00	\$740.00
Staff (Hourly)	1.75	110.00	\$192.50
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	33	0.50	\$16.50
CSRs/Live Operators/Correspondence Processing (Hourly)	0.50	75.00	\$37.50
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$3,867.46**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

**A.B. DATA, LTD.**

**Class Action Administration**

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**INVOICE #:** INV000305827  
**INVOICE DATE:** 12/31/2023  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** Net 30  
**DUE DATE:** 1/30/2024

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	9.00	225.00	\$2,025.00
Project Management (Hourly)	14.50	185.00	\$2,682.50
Staff (Hourly)	1.00	110.00	\$110.00
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	44	0.50	\$22.00
CSRs/Live Operators/Correspondence Processing (Hourly)	0.75	75.00	\$56.25
800 Number Charges (Per Minute)	139	0.15	\$20.85
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$5,322.56**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
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**SEND WIRES TO**

US BANK, N.A.  
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Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

**A.B. DATA, LTD.**

**Class Action Administration**

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**INVOICE #:** INV000305972  
**INVOICE DATE:** 1/31/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	14.00	225.00	\$3,150.00
Project Management (Hourly)	0.73	185.00	\$135.05
Staff (Hourly)	0.33	110.00	\$36.30
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	49	0.50	\$24.50
CSRs/Live Operators/Correspondence Processing (Hourly)	0.87	75.00	\$65.25
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$3,817.06**

**MAIL CHECKS TO**

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**SEND WIRES TO**

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Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

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**A.B. DATA, LTD.**

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**INVOICE #:** INV000306120  
**INVOICE DATE:** 2/29/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	20.00	225.00	\$4,500.00
Project Management (Hourly)	17.30	185.00	\$3,200.50
Staff (Hourly)	0.96	110.00	\$105.60
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	50	0.50	\$25.00
CSRs/Live Operators/Correspondence Processing (Hourly)	0.88	75.00	\$66.00
800 Number Charges (Per Minute)	90	0.15	\$13.50
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$8,316.56**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
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Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

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**A.B. DATA, LTD.**

**Class Action Administration**

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**INVOICE #:** INV000306277  
**INVOICE DATE:** 3/31/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	21.00	225.00	\$4,725.00
Project Management (Hourly)	10.85	185.00	\$2,007.25
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	43	0.50	\$21.50
CSRs/Live Operators/Correspondence Processing (Hourly)	1.05	75.00	\$78.75
800 Number Charges (Per Minute)	120	0.15	\$18.00
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$7,256.46**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

**A.B. DATA, LTD.**

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accounting@abdataclassaction.com  
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**INVOICE #:** INV000306438  
**INVOICE DATE:** 4/30/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Project Management (Hourly)	31.04	185.00	\$5,742.40
Staff (Hourly)	2.44	110.00	\$268.40
Postage	1	12.22	\$12.22
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	31	0.50	\$15.50
CSRs/Live Operators/Correspondence Processing (Hourly)	1.66	75.00	\$124.50
800 Number Charges (Per Minute)	81	0.15	\$12.15
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$6,581.13**

**MAIL CHECKS TO**

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**SEND WIRES TO**

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Swift Code USBKUS44IMT

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**INVOICE #:** INV000306552  
**INVOICE DATE:** 5/31/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	11.00	225.00	\$2,475.00
Project Management (Hourly)	17.28	185.00	\$3,196.80
Staff (Hourly)	3.41	110.00	\$375.10
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	18	0.50	\$9.00
CSRs/Live Operators/Correspondence Processing (Hourly)	0.92	75.00	\$69.00
800 Number Charges (Per Minute)	40	0.15	\$6.00
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Post Office Box Rental/Renewal	1	1,600.00	\$1,600.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$8,136.86**

**MAIL CHECKS TO**

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**SEND WIRES TO**

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Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

**A.B. DATA, LTD.**

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**INVOICE #:** INV000306758  
**INVOICE DATE:** 7/15/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	20.00	225.00	\$4,500.00
Project Management (Hourly)	4.40	185.00	\$814.00
Staff (Hourly)	0.62	110.00	\$68.20
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	18	0.50	\$9.00
CSRs/Live Operators/Correspondence Processing (Hourly)	0.78	75.00	\$58.50
800 Number Charges (Per Minute)	22	0.15	\$3.30
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$5,858.96**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

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Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

**A.B. DATA, LTD.**

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**INVOICE #:** INV000306896  
**INVOICE DATE:** 8/15/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	7.00	225.00	\$1,575.00
Project Management (Hourly)	4.38	185.00	\$810.30
Staff (Hourly)	1.22	110.00	\$134.20
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	20	0.50	\$10.00
CSRs/Live Operators/Correspondence Processing (Hourly)	4.24	75.00	\$318.00
800 Number Charges (Per Minute)	61	0.15	\$9.15
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$3,262.61**

**MAIL CHECKS TO**

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**SEND WIRES TO**

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Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

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**INVOICE #:** INV000307081  
**INVOICE DATE:** 9/16/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	22.00	225.00	\$4,950.00
Project Management (Hourly)	10.70	185.00	\$1,979.50
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	16	0.50	\$8.00
CSRs/Live Operators/Correspondence Processing (Hourly)	2.13	75.00	\$159.75
800 Number Charges (Per Minute)	42	0.15	\$6.30
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Bank, Broker, and Nominee Fulfillment Expenses	1	26,425.73	\$26,425.73
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$33,935.24**

**MAIL CHECKS TO**  
PO Box 170062, Milwaukee, WI 53217  
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**SEND WIRES TO**  
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Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

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**Class Action Administration**

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**INVOICE #:** INV000307244  
**INVOICE DATE:** 10/15/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	21.00	225.00	\$4,725.00
Project Management (Hourly)	7.88	185.00	\$1,457.80
Staff (Hourly)	0.25	110.00	\$27.50
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	16	0.50	\$8.00
CSRs/Live Operators/Correspondence Processing (Hourly)	1.43	75.00	\$107.25
800 Number Charges (Per Minute)	41	0.15	\$6.15
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$6,737.66**

**MAIL CHECKS TO**

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**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

**A.B. DATA, LTD.**

**Class Action Administration**

600 A. B. Data Drive  
Milwaukee, WI 53217  
414-961-7523  
accounting@abdataclassaction.com  
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP  
1251 AVENUE OF THE AMERICAS, 44TH  
FLOOR  
NEW YORK, NY, 10020  
USA

**INVOICE #:** INV000307348  
**INVOICE DATE:** 11/15/2024  
**CLIENT:** 107125  
**PAGE:** 1/1  
**TERMS:** 30 days upon receipt

**INVOICE**

**JOB 54705 Viacom Inc.**

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	25.00	225.00	\$5,625.00
Project Management (Hourly)	8.93	185.00	\$1,652.05
Staff (Hourly)	13.24	110.00	\$1,456.40
Website Maintenance/Hosting (Monthly)	1	200	\$200.00
Interactive Voice Response (IVR) (Per Minute)	11	0.50	\$5.50
CSRs/Live Operators/Correspondence Processing (Hourly)	1.05	75.00	\$78.75
800 Number Charges (Per Minute)	30	0.15	\$4.50
IVR and Line Maintenance (Monthly)	1	205	\$205.00
Electronic Storage (Per Page/Per Month)	48	0.02	\$0.96

**TOTAL \$9,228.16**

**MAIL CHECKS TO**

PO Box 170062, Milwaukee, WI 53217  
Make checks payable to A.B. DATA, LTD.

**SEND WIRES TO**

US BANK, N.A.  
400 W. Brown Deer Road, Bayside, WI 53217  
Routing Number 075000022  
Account Number 182377466541 (AB Data, Ltd.)  
Swift Code USBKUS44IMT

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A.B. Data, Ltd.  
Class Action Administration Company  
600 A.B. Data Drive  
Milwaukee, WI 53217

Date: November 17, 2024  
Project: Viacom Inc.

Distribution Estimate	Quantity	Rate (\$)	Estimated Cost (\$)
<b>Distribution Fees</b>			
Printing & Mailing Checks	1	1,750.00	1,750.00
Reissuance of Checks to Updated Addresses	2,500	5.00	12,500.00
Check-Processing Fee	17,772	0.20	3,554.40
Postage-Checks	17,772	0.50	8,886.00
Wires	89	50.00	4,450.00
<b>Website and Telephone Support/Charges</b>			
Website Maintenance/Hosting ( <i>monthly</i> )	12	200	2,400.00
Interactive Voice Response (IVR) ( <i>per minute</i> )	500	0.50	250.00
CSRs/Live Operators ( <i>per hour</i> )	20	75	1,500.00
800 Number Charges ( <i>per minute</i> )	1,000	0.15	150.00
IVR and Line Maintenance ( <i>monthly</i> )	12	205	2,460.00
<b>Project Management and Reporting</b>			
Project Management (hourly)	25	185	4,625.00
Quality Assurance (hourly)	2	180	360.00
Staff (hourly)	15	75	1,125.00
<b>Miscellaneous Expenses</b>			
Advanced Address Updates	2,500	3.75	9,375.00
Document Storage (\$1.50 per month)	12	1.50	18.00
Electronic Storage	12	20.00	240.00
Total Estimated Cost			\$ 53,643.40