

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

IN RE FRONTIER COMMUNICATIONS
CORPORATION STOCKHOLDERS
LITIGATION

No. 3:17-cv-01617-VAB

**SUPPLEMENTAL DECLARATION OF JACK EWASHKO REGARDING:
(A) MAILING OF THE NOTICE AND CLAIM FORM; AND
(B) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, Jack Ewashko, hereby declare under penalty of perjury as follows:

1. I am a Client Services Director of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. Pursuant to the Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated January 18, 2022 (ECF No. 193) (the "Preliminary Approval Order"), A.B. Data was authorized to act as the Claims Administrator in connection with the Settlement of the above-captioned action (the "Action").¹ I submit this Declaration as a supplement to my previously filed declaration, the Declaration of Jack Ewashko 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 April 5, 2022 (ECF No. 198-3) (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 set forth herein and, if called as a witness, could and would testify competently thereto.

¹ All capitalized terms that are not otherwise defined herein shall have the meanings provided in the Stipulation and Agreement of Settlement dated December 23, 2021 (ECF No. 192-2).

UPDATE ON DISSEMINATION OF THE NOTICE PACKET

2. As described in my Initial Mailing Declaration, in most class actions of this nature, and as is the case here, it is expected that the majority of potential Class Members are beneficial purchasers whose securities are held in “street name”—i.e., the securities are purchased by brokerage firms, banks, institutions, and other third-party nominees (“BBNs”) in the name of the nominee, on behalf of the beneficial purchasers. In order to provide the beneficial purchasers with notice, A.B. Data must obtain their names and addresses from the BBNs or rely on the BBNs for forwarding notices to them. The procedures used for disseminating the Notice through BBNs that were used in this case were consistent with the procedures used in all major securities class actions of which I am aware.

3. To obtain the names and addresses of beneficial owners of Frontier Securities, A.B. Data utilized its proprietary database of names and addresses of the largest and most common BBNs (the “Record Holder Database”). On February 15, 2022, A.B. Data caused the Notice and Claim Form (together, the “Notice Packet”), to be mailed to the 4,146 mailing records contained in A.B. Data’s Record Holder Database, together with 190,323 copies of the Notice Packet that were mailed to potential Class Members identified in the shareholder data files provided to A.B. Data by Defendants’ Counsel.

4. In conjunction with mailing of the Notice, on February 15, 2022, A.B. Data also requested that the securities clearing agency, the Depository Trust Company (“DTC”), post the Summary Notice on the DTC’s Electronic Legal Notice System (“LENS”). The LENS system is a comprehensive library of notices published by third party, public or private agents and agencies, reporting information about DTC-eligible securities (including the Frontier Securities), such as notices to security holders, bankruptcies, and notices regarding class action litigation. The LENS

system provides notice directly to the Proxy/Corporate Actions/Class Action department of DTC Participant financial institutions. The LENS system may be accessed by any DTC Participant including all the DTC Participants with a position in Frontier Securities.

5. The Notice directed those who purchased or otherwise acquired Frontier Securities during the Class Period for the beneficial interest of a person or entity other than themselves, to either (a) within seven (7) calendar days of receipt of the Notice, request from A.B. Data sufficient copies of the Notice Packet to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Notice Packet forward them to all such beneficial owners, or (b) within seven (7) calendar days of receipt of the Notice, provide to A.B. Data the names and addresses of all such beneficial owners. Based on the date of mailing, BBNs were required either to provide A.B. Data with the names and addresses of such beneficial owners or to send copies of the Notice Packet directly to such beneficial owners by approximately March 8, 2022.

6. In an effort to ensure that BBNs would provide their information to A.B. Data as soon as possible, on February 18, 2022, A.B. Data began an outreach program to BBNs that typically provide large quantities of name and addresses of potential class members in securities class action settlements. This outreach program consisted of emails and telephone calls to BBNs as well as a follow up emails to BBNs that did not respond to A.B. Data's initial outreach.

7. As of the date of this Declaration, A.B. Data has mailed a total of 755,128 Notice Packets to potential Class Members and BBNs. A total of 734,179, or 97.2% of the total number of Notice Packets sent to date, were mailed on or before March 15, 2022 (no later than five weeks before the exclusion/objection deadline), and a total of 755,095 Notices Packets, or 99.9% of the total number of Notice Packets sent to date, were mailed on or before April 5, 2022 (no later than

two weeks before the exclusion/objection deadline). And, by April 8, 2022 (no later than eleven days before the exclusion/objection deadline), all 755,128 Notice Packets had been mailed.

TELEPHONE HELPLINE AND WEBSITE

8. A.B. Data continues to maintain the toll-free telephone helpline, 1-877-311-3734, and interactive voice response system and live operators, to accommodate inquiries from potential Class Members. A.B. Data also continues to maintain the website dedicated to the Settlement, www.FrontierCommunicationsSecuritiesLitigation.com, to assist potential Class Members. On April 6, 2022, A.B. Data posted to the website copies of the papers filed in support of Lead Plaintiffs' motion for final approval of the Settlement and Plan of Allocation and Lead Counsel's motion for an award of attorneys' fees and Litigation Expenses. A.B. Data will continue maintaining and, as appropriate, updating the website and toll-free telephone helpline until the conclusion of the administration.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED

9. Pursuant to the Preliminary Approval Order and as set forth in the Notice and Summary Notice, Class Members who wished to be excluded from the Settlement Class were required to request exclusion in writing so that the request was received no later than April 19, 2022. Class Members were informed that requests for exclusion from the Settlement Class are to be sent to a P.O. Box maintained by A.B. Data. A.B. Data has been monitoring all mail delivered to the P.O. Box. As of the date of this Declaration, A.B. Data has received a total of seventy-two (72) requests for exclusion from the Settlement Class. Attached hereto as Exhibit A is a list of the seventy-two (72) persons and entities who have requested exclusion from the Settlement Class.

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

Executed this 3rd day of May 2022.

A handwritten signature in black ink, appearing to read "J Ewashko".

Jack Ewashko

Exhibit A**List of Persons and Entities Requesting Exclusion from the Settlement Class**

Name	City, State
1. Lynne A. Kline TOD Michele S. Armstrong Subject to STA TOD Rules	Davie, FL
2. Leonard & Eileen DeStefano	Drexel, Hill, PA
3. Thelma Niederbuhl	Bloomington, NY
4. Loretta Griffin	Oak Creek, WI
5. Carolann Coburn	Tonawanda, NY
6. R.L. Crigler	Chicago, IL
7. Estate of Nancy Akin	Minocqua, WI
8. Doris F. Killian	Bellingham, WA
9. Arnold L. Lehmann	Spokane, WA
10. Karen Foster	Foley, AL
11. Andrew W. Viola	White Plains, NY
12. Dennis Michael Erwin Mary Kathleen Erwin	Leawood, KS
13. Bernard A. Kroeger Alani Kroeger JT Ten	Lutz, FL
14. Blanche Shirley Miller Virosco	Denville, NJ
15. Allison Pierce	Rockport, ME
16. Edwin K. Suganuma & Jeanette Suganuma JT Ten	Honolulu, HI
17. Patricia Nottmeier Rauch	Columbia, IL
18. Elizabeth A. Laughlin	Washington, IL
19. John & Lilly J. Methratta	Martinez, CA

20. James T. Cook (William T. Cook & Anna G. Cook Revocable Trust UA 02/08/91)	Bensenville, IL
21. Lewandowski Family Living Tr. Jeanne M. Henderson, TTEE	Bay City, MI
22. Annamaria F. Demiris	Woodstock, GA
23. Richard R. Bidney	White Bear Township, MN
24. James G. McGlynn Katherine M. McGlynn Ten Com	West Mifflin, PA
25. Robert F. Englmeier	Ft. Pierce, FL
26. Mary E. Oskroba	Lombard, IL
27. Mary E. Oskroba & Loretta E. Oskroba JT Ten	Lombard, IL
28. John W. Vance	Columbus, OH
29. Dorthy L. Vance	Columbus, OH
30. Kathleen Hughes Fisher, TTEE For the Kathleen Hughes Fisher Trust dtd 05/27/2009	Fairfax, VA
31. S.K. Kashiwagi-McCaskey TTEE For Tsugio Fujimoto TR UA dtd 05/12/1993	Sacramento, CA
32. Camille A. Sheats	East Point, GA
33. Marian K. Murta Bell	Moscow, ID
34. Kathryn J. McCatherin	Jensen Beach, FL
35. Carollee E. Brue	Brodheadsville, PA
36. Edward F. Adams	Marietta, GA
37. William & Joyce Corder	Newark, OH
38. Randall S. Hart	Midwest City, OK
39. Katherine Barbara Doyle	Annadale, VA
40. Raymond Michalek	New York, NY

41. Ann Conde	East Patchogue, NY
42. Colette E. Hensley	Cosby, TN
43. Robert H. Massey Angela M. Wallace, Joint Tenant	Roanoke, VA
44. Eleanor B. Clayton	Winston-Salem, NC
45. Elizabeth Russitano	Ridge, NY
46. Jane A. Czarnota	Garnet Valley, PA
47. Mary Ann Johnson	Rockport, MA
48. James A. Burke	Alexandria, VA
49. Mary McKay	Wahoo, NE
50. Emily M. Clayton	Bosque Farms, NM
51. Charles E. Kern Jr. Heidi A. Kern	Oakland, MD
52. Dorthy Glomb	Somerset, NJ
53. Penni S. & Don C. Klick JT Ten	Anthem, AZ
54. Joshua Mayer	Colorado Springs, CO
55. Charles R. Maier	Wayne, NE
56. Marilyn A. Farr	Houston, TX
57. Lynn Griesmeyer	Rolling Meadows, IL
58. Alphonse Porpora	West Babylon, NY
59. Betty S. Lee	Princeton, WV
60. Bernadette Rowe	Ft. Washington, MD
61. Peyer Family Revocable Trust UAD June 6, 2015 Harold A. & Donna Lee Peyer, Co-TTEES	Kent, WA
62. Jo Ann Woodall	Mesa, AZ
63. Anthony Buccarelli	Hollywood, FL

64. Jack B. Lyle	West Melbourne, FL
65. Ronald Lee Paschal	High Point, NC
66. Estate of Dorothy A. Hare JoAnne M. Ludwig	Portland, OR
67. Jeline H. Ware	Carmichael, CA
68. Carol Gilmore	Grand Junction, CO
69. Diana Rank	Arma, KS
70. Susan G. Braman, TTEE Susan G. Braman Revocable Trust U/A 03/12/15	Titusville, FL
71. Carole S. Carthron	Alpharetta, GA
72. Joyce G. Sipiczky	Courtland, VA