

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

IN RE FRONTIER COMMUNICATIONS
CORPORATION STOCKHOLDERS
LITIGATION

No. 3:17-cv-01617-VAB

**LEAD PLAINTIFFS' MOTION FOR
APPROVAL OF DISTRIBUTION PLAN**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rule of Civil Procedure 23(e) and this Court's Order and Final Judgment Approving Class Action Settlement (ECF No. 214), Lead Plaintiffs, Arkansas Teacher Retirement System and Carlos Lagomarsino (collectively, "Lead Plaintiffs"), on behalf of themselves and the Settlement Class, will and do hereby move this Court for entry of the accompanying [Proposed] Order Approving Distribution Plan ("Class Distribution Order"). In further support of this motion, Lead Plaintiffs submit (i) the Declaration of Jack Ewashko in Support of Lead Plaintiffs' Motion for Approval of Distribution Plan ("Ewashko Declaration") submitted on behalf of the Court-approved Claims Administrator, A.B. Data, Ltd. Class Action Administration Company ("A.B. Data"); (ii) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Approval of Distribution Plan; and (iii) all other papers and proceedings herein.

Among other things, the Class Distribution Order would: (i) approve the administrative determinations of A.B. Data accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by A.B. Data as valid and approved by the Court ("Authorized Claimants"), while maintaining a Reserve for any tax liability or claims

administration-related contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 90 days after the issue date; (iv) direct that Authorized Claimants will forfeit all recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (v) approve the recommended plan for any funds remaining after the distribution; (vi) approve A.B. Data's fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration process; and (viii) authorize the destruction of Claim Forms and supporting documents at an appropriate time.

This motion seeks, among other things, Court approval of the Claims Administrator's determinations accepting and rejecting Claims. The claims administration process afforded Claimants the opportunity to dispute the rejection of their Claims and the right to ask for judicial review of the Claims Administrator's determinations. Three (3) Claimants have disputed the rejection of their Claims (the "Disputed Claims") and have requested review by the Court.

Lead Counsel has reviewed the Disputed Claims and agrees with the Claims Administrator's determination to reject the Disputed Claims. The Ewashko Declaration explains the basis for the rejection of the Disputed Claims. We are today sending the Claimants with Disputed Claims a copy of this Motion, the Ewashko Declaration, the supporting documentation attached to Exhibit D of the Ewashko Declaration that relates to each Claimant's Disputed Claim, and the proposed Distribution Order. We are informing each Claimant in a cover letter that the Claimant does not need to take any further action to have the Court consider that particular Claimant's dispute. If, however, a Claimant wishes to make an additional submission that Claimant should direct it to Your Honor's attention with a copy to Lead Counsel and

postmarked no later than November 13, 2023. If any such submission is made, Lead Plaintiffs will file a Reply by November 27, 2023.

Pursuant to the terms of the Stipulation, Defendants have no interest in the relief sought by the motion. Further, Defendants' Counsel have reviewed the motion and informed us that Defendants take no position on the motion. Accordingly, Lead Counsel respectfully submits that the motion is ripe for consideration by the Court and may be decided on the papers.

Dated: October 20, 2023

Respectfully submitted,

/s/ Katherine M. Sinderson

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