

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

**IN RE: SAKS INC.
SHAREHOLDER LITIGATION**

Index No. 652724/2013
IAS Part 53
Hon Andrew Borrok, J.S.C

**SUPPLEMENTAL MAILING AFFIDAVIT OF LUIGGY SEGURA
REGARDING: (A) CONTINUED MAILING OF THE NOTICE AND
CLAIM FORM; AND (B) REPORT ON REQUESTS FOR EXCLUSION
RECEIVED TO DATE**

State of New York)
) ss.:
County of Nassau)

Luiggy Segura, being duly sworn, deposes and says:

1. I am the Senior Director of Securities Class Actions at JND Legal Administration (“JND”). Pursuant to the Court’s December 10, 2020 Decision and Order Preliminarily Approving Settlement, Providing for Notice of Settlement, and Scheduling Settlement Hearing (NYSCEF DOC. NO. 247) (the “Preliminary Approval Order”), Plaintiffs’ Counsel was authorized to retain JND as the Settlement Administrator in connection with the Settlement of the above-captioned action (the “Action”).¹ I am over 21 years of age and am not a party to the Action. I

¹ All capitalized terms used in this Affidavit that are not otherwise defined herein

have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.

2. I submit this Affidavit as a supplement to my previously filed Affidavit, the Affidavit 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 March 24, 2021 (the “Initial Mailing Affidavit”). The following statements are based on my personal knowledge and information provided to me by other experienced JND employees, and if called as a witness, I could and would testify competently thereto.

CONTINUED MAILING OF THE NOTICE AND CLAIM FORM

3. Since the execution of the Initial Mailing Affidavit, JND has continued to disseminate copies of the Notice and Claim Form in response to requests from potential Class Members and brokers/nominees. Through April 15, 2021, JND has mailed a total of 20,225 Notice and Claim Forms to potential Class Members and broker/nominees.

shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, Compromise, and Release, dated December 3, 2020 (NYSCEF DOC. NO. 242) (the “Stipulation”).

UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE

4. JND continues to maintain the toll-free telephone number (1-833-707-1446) and Interactive Voice Recording (“IVR”) to accommodate inquiries about the Settlement. JND has promptly responded to each telephone inquiry and will continue to respond to Class Member inquiries via the toll-free telephone number.

5. JND also continues to maintain the website dedicated to the Settlement www.SaksSecuritiesSettlement.com (the “Settlement Website”) to assist potential Class Members. JND has posted to the Settlement Website copies of the papers filed in support for final approval of the Settlement, certification of the class, and Plaintiffs’ motion for an award of attorneys’ fees and Litigation Expenses.

6. JND will continue operating, maintaining and, as appropriate, updating the toll-free telephone number/IVR and Settlement Website with relevant case information until the conclusion of the administration.

REQUESTS FOR EXCLUSION

7. As set forth in the Notice, Any person or entity falling within the definition of the Class who wishes to exclude themselves from the Class must submit to Plaintiffs’ Counsel a request for exclusion (“Request for Exclusion”) such that it was received no later than April 5, 2021. Requests for Exclusion were to be sent by first-class mail to the representative of Plaintiffs’ Counsel at the following address:

Benjamin Y. Kaufman, Wolf Haldenstein Adler Freeman & Herz LLP, 270 Madison Avenue, New York, NY 10016.

8. I am informed that Plaintiffs' Counsel has received one (1) request for exclusion (Mr. Edwin Echols). JND has also received one (1) letter from a potential Class Member (Ms. Sandra Kingdon) stating that she does "not wish to be involved with a lawsuit, settlement or anything others are seeking" in this litigation but also stating that she "does not know if I am a class member". A copy of Ms. Kingdon's letter is attached as Exhibit A.

Dated: April 16th, 2021

New Hyde Park, New York

Luiggy Segura
Luiggy Segura

Sworn to before me this 16th day of April, 2021.

William A. O'Loughlin
WILLIAM A. O'LOUGHLIN
Notary Public, State of New York
No. 01OL5084336
Qualified in Suffolk County
Commission Expires Sept 2, 2021
Notary Public
My commission expires: