

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JACKSON COUNTY EMPLOYEES'
RETIREMENT SYSTEM, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CARLOS GHOSN, et al.,

Defendants.

) Civil Action No. 3:18-cv-01368

) CLASS ACTION

) Hon. William L. Campbell, Jr.

) Magistrate Judge Alistair Newbern

) SUPPLEMENTAL DECLARATION OF

) ROSS D. MURRAY REGARDING NOTICE

) DISSEMINATION, CLAIMS RECEIVED TO

) DATE, AND REQUESTS FOR EXCLUSION

) RECEIVED TO DATE

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s May 26, 2022 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”) (ECF 243), Gilardi was appointed to supervise and administer the notice procedure as well as the processing of Claims in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”). I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (ECF 253) (the “Initial Mailing Declaration”). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE

3. As more fully detailed in the Initial Mailing Declaration, as of August 15, 2022, Gilardi had mailed 73,969 copies of the Court-approved Notice of Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

4. Since August 15, 2022, Gilardi has mailed an additional 3,927 copies of the Claim Package in response to requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of September 12, 2022, Gilardi has mailed a total of 77,896 Claim Packages to potential Class Members and nominees.

CLAIMS RECEIVED TO DATE

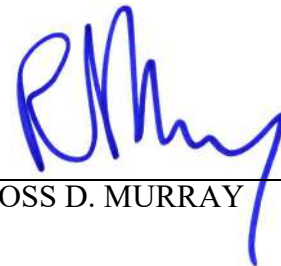
5. Pursuant to the Notice Order, the Notice informed potential Class Members that Proofs of Claim must be mailed to *Nissan Securities Litigation*, Claims Administrator, c/o Gilardi & Co. LLC, P.O. Box 43304, Providence, RI 02940-3304, such that they are postmarked no later than September 14, 2022, or submitted online at www.NissanSecuritiesLitigation.com no later than September 14, 2022. As of the date of this declaration, Gilardi has received 4,936 Proofs of Claim for processing.

REQUESTS FOR EXCLUSION RECEIVED TO DATE

6. Pursuant to the Notice Order, the Notice informed potential Class Members that written requests for exclusion from the Class must be mailed to *Nissan Securities Litigation*, c/o Gilardi & Co. LLC, EXCLUSIONS, 150 Royall Street, Suite 101, Canton, MA 02021, such that they are received no later than August 29, 2022. At the time of the Initial Mailing Declaration, Gilardi reported that it had not received any requests for exclusion in connection with this Settlement. *See* Initial Mailing Declaration, ¶16. After the declaration was filed, it was discovered that one exclusion had been received and inadvertently overlooked.

7. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has received additional requests for exclusion. A full list of requests for exclusion is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of September, 2022, at San Rafael, California.



ROSS D. MURRAY

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 12, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood

CHRISTOPHER M. WOOD

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Mailing Information for a Case 3:18-cv-01368 Jackson County Employees' Retirement System v. Ghosn et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Hiroshi Karube
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EXHIBIT A

	Excluded Party	Sub-funds
1	Vladimir Karpinsky	
2	James Edward Ryan	
3	ECM Master Fund, Effissimo Capital Management Pte Ltd, Attn Director Hisaaki Sato	
4	ALPS Advisors	ALPS International Sector Dividend Dogs ETF
5	First Trust Exchange-Traded AlphaDEX Fund II	First Trust Developed Markets ex-US AlphaDEX Fund First Trust Japan AlphaDEX Fund
6	First Trust Exchange -Traded Fund II	First Trust NASDAQ Global Auto Index Fund
7	First Trust Exchange -Traded Fund III	First Trust Horizon Managed Volatility Developed International ETF First Trust RiverFront Dynamic Asia Pacific ETF First Trust RiverFront Dynamic Developed International ETF
8	First Trust Exchange-Traded Fund VI	Developed International Equity Select ETF
9	Wells Fargo Funds Trust	Wells Fargo Diversified International Fund
10	Wells Fargo Master Trust	Wells Fargo International Value Portfolio
11	Vanguard International Equity Index Funds	Vanguard FTSE All World ex-US Index Fund Vanguard Pacific Stock Index Fund Vanguard Total World Stock Index Fund
12	Vanguard Star Funds	Vanguard Total International Stock Index Fund
13	Vanguard Tax-Managed Funds	Vanguard Developed Markets Index Fund (127) Vanguard Developed Markets Index Fund (950)
14	Vanguard Whitehall Funds	Vanguard International High Dividend Yield Index Fund
15	Vanguard World Fund	Vanguard ESG International Stock ETF
16	Vanguard Fiduciary Trust Company Pacific Stock Index Trust	Vanguard Pacific Stock Index Trust (Fund 737)
17	DFA Investment Dimensions Group Inc	International Core Equity Portfolio International High Relative Profitability Portfolio International Sustainability Core 1 Portfolio International Vector Equity Portfolio Large Cap International Portfolio T.A. World ex U.S. Core Equity Portfolio Tax-Managed DFA International Value Portfolio VA International Value Portfolio World ex U.S. Core Equity Portfolio
18	DFA Investment Trust Company	DFA International Value Series
19	Lockheed Martin Investment Management Corp	Lockheed Martin Corporation Defined Contribution Plans Master Trust, DCMT TDF NON-U.S. HEXAVEST Lockheed Martin Corporation Master Retirement Trust, LOCKHEED HEED HEXAVEST GLOBAL
20	SPDR Index Shares Fund	SPDR MSCI ACWI Low Carbon Target ETF SPDR MSCI EAFE StrategicFactors ETF SPDR MSCI World StrategicFactors ETF SPDR Solactive Japan ETF SPDR Portfolio Developed World ex-US ETF SPDR Portfolio MSCI Global Stock Market ETF SPDR MSCI ACWI ex-US ETF SPDR MSCI EAFE Fossil Fuel Reserves Fee ETF
21	Global Managed Common Trust Funds, State Street Global Advisors Trust Co as TTEE	State Street World Enhance Securities Lending Common Trust Fund
22	Investment Funds for Tax Exempt Retirement Plans, State Street Global Advisors Trust Co as TTEE	State Street Daily MSCI EAFE Index Non-Lending Fund State Street International Index Securities Lending Series Fund State Street MSCI ACWI Minimum Volatility Index Non-Lending QIB Fund State Street MSCI EAFE Consumer Discretionary Index Non-Lending Fund State Street MSCI Japan Index Non-Lending Fund State Street World Developed Ex-US Index Securities Lending Series Fund State Street World Ex-US Index Non-Lending Series Fund
23	SSga MSCI ACWI EX-USA Index Non-Lending Daily Trust, State Street Global Advisors Trust Co as TTEE	
24	State Street Institutional Investment Trust	State Street Global All Cap Equity ex-U.S. Index Portfolio
25	State Street Master Funds	State Street International Developed Equity Index Portfolio

	Excluded Party	Sub-funds
26	Schwab Capital Trust	Schwab Fundamental International Large Company Index Fund Schwab International Index Fund Laudus International MarketMasters Fund
27	Schwab Strategic Trust	Schwab Fundamental International Large Company Index ETF Schwab International Equity ETF
28	Russell Investments Funds	Russell Investments Funds International Developed Markets Fund
29	Russell Investments Trust Company	Russell Investments Trust Co Commingled Employee Benefit Trust International Fund Russell Investments Trust Co Commingled Employee Benefit Funds Trust Multi-Asset Core FD Russell Investments Trust Co Commingled Employee Benefit Funds Trust World Equity FD
30	North Dakota State Investment Board	
31	Nationwide Mutual Funds	Nationwide International Index Fund
32	Nationwide Variable Insurance Trust	NVIT International Index Fund NVIT Multi-Manager International Value Fund
33	Massachusetts Pension Reserves Investment Management Board	
34	John Hancock Exchange-Traded Fund Trust	JH Multifactor Developed International ETF
35	John Hancock Fund II	JHF II International Strategic Equity Allocation JHF II Sea International Fund
36	John Hancock Hedged Equity & Income Fund	JHF Hedged Equity & Income Fund
37	John Hancock Variable Insurance Trust	JHVIT International Equity Index Trust JHVIT Sea International Trust
38	Deutsche DWS Institutional Funds	DWS EAFE Equity Index Fund
39	College Retirement Equities Fund	CREF Stock Account
40	Deutsche DWS Institutional Funds Inc	Deutsche DWS CROCI International Fund
41	Deutsche DWS Market Trust	DWS Global Income Builder Fund
42	Deutsche DWS Variable Series I	DWS CROCI International VIP
43	Deutsche DWS Variable Series II	DWS Global Income Builder VIP
44	Colorado Public Employees Retirement Association	
45	California State Teachers' Retirement System	
46	California Public Employees' Retirement System	
47	Arizona PSPRS Trust	
48	Advisor Managed Trust on behalf of Tactical Offensive Equity Fund	AMT Tactical Offensive Equity
49	SEI Institutional Investments Trust	SIIT Global Managed Volatility SIIT World Select Equity
50	SEI Institutional Managed Trust	SIMT Tax-Managed International Managed Volatility
51	3M Employee Retirement Income Plan Trust	
52	Seasons Series Trust	SA Multi-Managed International Equity Portfolio
53	SunAmerica Series Trust	SA Putnam International Growth & Income Portfolio SA Legg Mason Tactical Opportunities Portfolio SA Blackrock Global Multi Asset Portfolio SA International Index Portfolio Variable Annuity Life Insurance Company I International Equities Index Fund
54	Valic Company I	EQ Advisors Tr- AXA International Core Managed Volatility Portfolio
55	EQ Advisors Trust	EQ Advisors Tr- AXA Global Equity Managed Volatility Portfolio EQ Advisors Tr-AXA International Managed Volatility Portfolio EQ Advisors Tr-AXA International Value Managed Volatility Portfolio EQ Advisors Tr-AXA/AB Dynamic Growth Portfolio EQ Advisors Tr- EQ/ALLIANCEBERNSTEIN International Portfolio EQ/ALLIANCEBERNSTEIN Dynamic Wealth Strategies Portfolio EQ Advisors Tr-ATM International Managed Volatility Portfolio EQ Advisors Tr-AXA/Templeton Global Equity Managed Volatility
56	TIAA-CREF Funds	TIAA-CREF International Equity Index Fund
57	Thrivent Core Funds	Thrivent Core International Equity Fund

	Excluded Party	Sub-funds
58	Thrivent Mutual Funds	Thrivent Moderate Allocation Fund
		Thrivent Aggressive Allocation Fund
		Thrivent Balance Income Plus Fund
		Thrivent Global Stock Fund (fka Large Cap Stock Fund)
		Thrivent Low Volatility Equity Fund
		Thrivent Diversified Income Plus Fund
		Thrivent Moderately Aggressive Allocation Fund
		Thrivent International Allocation Fund (fka Thrivent Partner Worldwide Allcation Fund)
59	Thrivent Series Funds	Thrivent Moderate Allocation Portfolio
		Thrivent Aggressive Allocation Portfolio
		Thrivent Balance Income Plus Portfolio
		Thrivent Global Stock Fund (fka Large Cap Stock Portfolio)
		Thrivent Low Volatility Equity Portfolio
		Thrivent Diversified Income Plus Portfolio
		Thrivent International Allocation Portfolio (fka Thrivent Partner Worldwide Allocation Portfolio)
		Thrivent Moderately Aggressive Portfolio
60	College Retirement Equities Fund	CREF Global Equities Account
61	State Street Global advisors Trust as ttee of World Index Common Trust Funds	State Street Factor-Based Non-Lending Common Trust Func
		State Street FTSE RAFI Developed 1000 Index Non-Lending Common Trust Fund
		State Street MSCI ACWI EX USA IMI Screened Non-Lending Common Trust Fund
		State Street MSCI Japan Index Non-Lending Common Trust Func
		State Street MSCI Pacific Screened Index Non-Lending Common Trust Fund
		State Street RAFI Fundamental Developed EX-US Index Non-Lending Common Trust Fund
		State Street Russell RAFI Global EX-U.S. Index Non-Lending Common Trust Fund