

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SJUNDE AP-FONDEN and THE  
CLEVELAND BAKERS AND  
TEAMSTERS PENSION FUND,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY, et al.,

Defendants.

Case No. 1:17-cv-8457-JMF

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA REGARDING  
ADDITIONAL REQUESTS FOR EXCLUSION RECEIVED**

I, Luiggy Segura, declare as follows:

1. I am a Vice President at JND Legal Administration (“JND”). The Court authorized Class Counsel’s retention of JND to supervise and administer the notice procedure in connection with the above-captioned action (“Action”). I submit this Declaration as a supplement to my previously-filed declaration, the Declaration of Luiggy Segura Regarding (A) Mailing of the Notice and Postcard Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received dated September 2, 2022 (ECF No. 342) (“Initial Mailing Declaration”) and in order to provide the Court and the Parties to the Action with information regarding additional requests for exclusion received since the execution of the Initial Mailing Declaration.<sup>1</sup>

The following statements are based on my personal knowledge and information provided to me by

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<sup>1</sup> All capitalized terms not defined in this Declaration have the meanings provided in the Initial Mailing Declaration.

other experienced JND employees, and, if called as a witness, I could and would testify competently thereto.

**REPORT ON ADDITIONAL EXCLUSION REQUESTS RECEIVED**

2. As previously reported in the Initial Mailing Declaration, JND received: (i) three hundred and six (306) timely requests for exclusion (i.e., requests for exclusion received or postmarked on or before August 15, 2022); (ii) four (4) late requests for exclusion (i.e., requests for exclusion postmarked after August 15, 2022);<sup>2</sup> and (iii) five (5) requests for exclusion received after August 15, 2022, with a postmark date that was not legible.

3. Since the execution of the Initial Mailing Declaration, JND has received three (3) additional requests for exclusion, of which one (1) is timely<sup>3</sup> and two (2) are late. Exhibit A hereto lists the three (3) requests for exclusion received after the execution of the Initial Mailing Declaration.

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

Executed on October 12, 2022 at New Hyde Park, New York.

  
LUIGGY SEGURA

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<sup>2</sup> Per Order dated September 6, 2022 (ECF No. 344), the Court deemed the request for exclusion submitted by the plaintiffs in the action captioned *Touchstone Strategic Trust et al. v. Gen. Elec. Co. et al.*, No. 19-cv-1876 (JMF) (S.D.N.Y.) to be timely.

<sup>3</sup> This request for exclusion was mailed from France with a postmark date of August 12, 2022. It was not received by JND until September 12, 2022.

# **EXHIBIT A**

## ADDITIONAL TIMELY EXCLUSION REQUEST

1. Myriam Takla Paris, France	
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## ADDITIONAL LATE EXCLUSION REQUESTS

<p>1. HSBC House on behalf of San Franchesco Ltd (liquidated) Esplanada St. Helier, Jersey</p>	<p>2. Nancy Honeycutt Jolly Statesville, NC</p>
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