

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Carol Glock, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

FTS International, Inc., et al.,

Defendants.

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§ Civil Action No. 4:20-cv-03928

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§ Judge: Lee H. Rosenthal

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**SUPPLEMENTAL DECLARATION OF ROSS D. MURRAY REGARDING  
NOTICE DISSEMINATION 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 December 8, 2020 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”) (ECF No. 15), 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”).<sup>1</sup> 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 (the “Initial Mailing Declaration”) (ECF No. 22). 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 February 12, 2021, Gilardi had mailed 15,595 copies of the Court-approved Notice of Pendency and Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Settlement Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

4. Since February 12, 2021, Gilardi has mailed an additional 386 copies of the Claim Package in response to additional requests from potential Settlement 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 April 1, 2021, Gilardi has mailed a total of 15,981 Claim Packages to potential Settlement Class Members and nominees.

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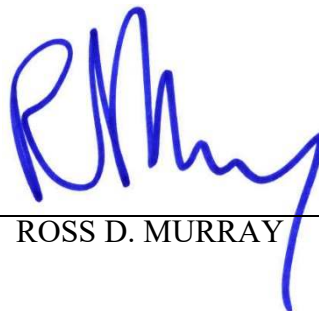
<sup>1</sup> All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated November 19, 2020 (the “Stipulation”) (ECF No. 9).

**REQUESTS FOR EXCLUSION RECEIVED TO DATE**

5. Pursuant to the Notice Order, the Notice informed potential Settlement Class Members that written requests for exclusion from the Settlement Class must be mailed to *FTSI Securities Settlement*, Claims Administrator, c/o Gilardi & Co. LLC, EXCLUSIONS, 150 Royall Street, Suite 101, Canton, MA 02021, such that they are received no later than March 22, 2021. As reported in the Initial Mailing Declaration, as of February 12, 2021, Gilardi had not received any requests for exclusion from the Settlement Class at this mailing address. *See* Initial Mailing Declaration, ¶16.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has received one late request for exclusion from the Settlement Class, a redacted copy of which is attached as Exhibit A hereto.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 1st day of April, 2021, at San Rafael, California.



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ROSS D. MURRAY

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on April 5, 2021, 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 e-mail addresses on the Electronic Mail Notice List.

*s/ Scott H. Saham*

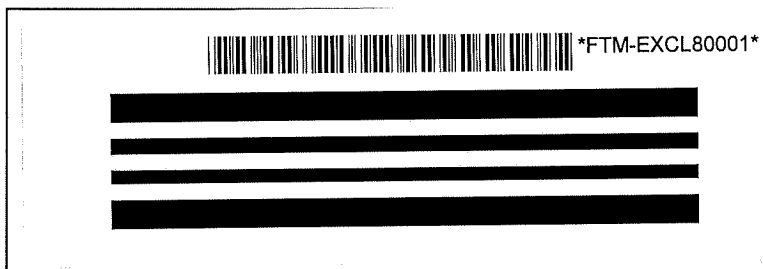
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SCOTT H. SAHAM

ROBBINS GELLER RUDMAN  
& DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101-8498  
Telephone: 619/231-1058  
619/231-7423 (fax)

E-mail: [scotts@rgrdlaw.com](mailto:scotts@rgrdlaw.com)

# EXHIBIT A



RECEIVED  
MAR 24 2021  
CLAIMS CENTER  
*ms*

## Exclusion Cover Page

Case Name: FTS International, INC., et al.,

Case Code: FTM

Exclusion Deadline: March 22, 2021 (must be *received on or before*)

Name of Person Filing Exclusion: Gary L Day

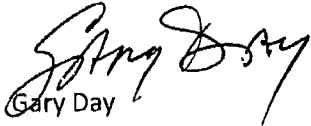
March 19, 2021

Settlement  
Administrator  
& Co. LLC  
x 43314  
vidence, RI. 02940-3314

To Whom it may concern:

I, Gary L. Day, request exclusion from the settlement class lawsuit against FTS International Inc.

Sincerely,



Gary Day

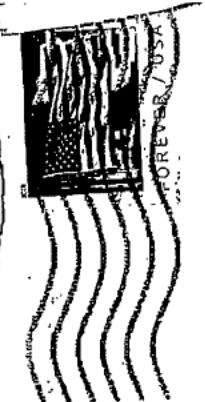
Civil Action # 4:20-CV-03928

Conrad Day

Received

MAR 24 2021

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F.T.S. Security Settlement.

Claims Administrator.

c/o BOLANDER & CO LLC

Civil Action #  
4:20-cv-03928

POSTER 203314

Procedural ~~Order~~ ~~33~~

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