

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CAROL GLOCK, Individually and on Behalf of All Others Similarly Situated,	§	Civil Action No. 4:20-cv-03928
	§	
	§	
Plaintiff,	§	Judge: Lee H. Rosenthal
	§	
vs.	§	
	§	
FTS INTERNATIONAL, INC., et al.,	§	
	§	
Defendants.	§	

DECLARATION OF CAROL GLOCK IN SUPPORT OF LEAD PLAINTIFF’S MOTION FOR: (1) FINAL APPROVAL OF CLASS ACTION SETTLEMENT; (2) APPROVAL OF PLAN OF ALLOCATION; (3) AWARD OF ATTORNEYS’ FEES AND EXPENSES; AND (4) AWARD TO LEAD PLAINTIFF PURSUANT TO 15 U.S.C. §77z-1(a)(4)

I, Carol Glock, hereby declare as follows:

1. I am the lead plaintiff (“Lead Plaintiff”) in the above-captioned securities class action (the “Litigation”). I respectfully submit this declaration in support of final approval of the \$9,875,000.00 settlement (“the Settlement”), the plan of allocation, and an award of attorneys’ fees and expenses. I also submit this declaration in support of my request for an award of \$2,500.00, pursuant to 15 U.S.C. §77z-1(a)(4), based on my representation of the Settlement Class. I have personal knowledge of the statements herein, and, if called as a witness, could and would testify competently thereto, as I have been directly involved in overseeing the prosecution of the Litigation as well as the negotiations leading to the Settlement.

2. Since the start of this Litigation, and to date, I have been committed to assisting Lead Counsel and serving the best interests of the Settlement Class. In doing so, I performed what I believe to be critical tasks to help protect the Settlement Class and ensure that the Litigation was vigorously prosecuted, including: (i) communicating with Lead Counsel prior to the case being filed, participating in telephone calls, correspondence, an in-person meeting with Lead Counsel concerning my stock transactions and my responsibilities and duties as a class representative and Lead Plaintiff in a securities class action; (ii) discussing case strategy, updates, and the status of the Litigation; and (iii) and remaining informed as to material events related to FTS International, Inc.

3. Additionally, I reviewed, analyzed, and discussed with Lead Counsel the following documents in this Litigation: (i) Lead Plaintiff’s initial and amended petitions; (ii) briefing related to Defendants’ special exceptions to the initial and amended petitions and the Court’s rulings in connection thereto; (iii) briefing related to Defendants’ motion for

interlocutory appeal; (iv) briefing related to Defendants' notice of removal to the United States Bankruptcy Court for the Northern District of Texas; (v) mediation submissions; (vi) drafts of the Stipulation, exhibits thereto, and other Settlement-related documents; and (vii) this Court's order granting the motion for preliminary approval of the Settlement.

4. When settlement discussions arose, as part of my duty to act in the best interest of the Settlement Class, I provided input and direction regarding settlement strategy. In connection with the April 29, 2020 mediation, I reviewed the mediation submissions and discussed the strengths and weaknesses of the Litigation with Lead Counsel as well as the risks in proceeding forward with the Litigation. Thereafter, given Lead Counsel's vigorous settlement negotiations as well as my efforts in this matter, I provided Lead Counsel with settlement authority and the Litigation was able to settle after mediation for \$9,875,000.00.

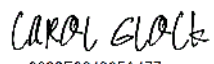
5. Given my experience and effort expended in understanding the Litigation, and when weighing the merits and risks of the Litigation, I believe the \$9,875,000.00 Settlement is a very good result for the Settlement Class. The Settlement could not have been accomplished without Lead Counsel's relentless prosecution of the Litigation. Therefore, I believe the Settlement represents a fair, reasonable, and adequate recovery on behalf of the Settlement Class and that its approval is in the best interest of the Settlement Class.

6. Furthermore, I have approved and support Lead Counsel's request for an award of attorneys' fees of 33% of the Settlement Amount and payment of Lead Counsel's requested litigation expenses not to exceed \$400,000, with interest on both amounts. Given the high-quality representation, responsiveness, and diligence in prosecuting this Litigation, as well as the resulting recovery of \$9,875,000.00 for the Settlement Class in the face of the risk of no recovery

at all, I believe Lead Counsel's requested award of attorneys' fees and expenses are both fair and just.

7. In accordance with my duties as a lead plaintiff, I have not received, nor have I been promised or offered any financial incentive or compensation for serving as a Lead Plaintiff in the Litigation. Nevertheless, I understand that courts may authorize an award to a representative serving on behalf of the Settlement Class directly relating to their representation of the Settlement Class. While I know that the grant of such an award is entirely in the discretion of the Court, it is also my understanding that the Settlement Class has been given notice of my intention to seek an award of \$2,500.00 for my efforts in bringing and prosecuting the Litigation. I therefore respectfully request an award of \$2,500.00 in connection with the time and effort I spent representing the Settlement Class in the Litigation.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2ND day of February, 2021 at Gibsonia, Pennsylvania.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 17, 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

SCOTT H. SAHAM

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