

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE ANIMATION WORKERS ANTITRUST
LITIGATION

Master Docket No. 14-CV-4062-LHK

DECLARATION OF KENNETH JUE
ON BEHALF OF NOTICE
ADMINISTRATOR IN SUPPORT OF
FINAL APPROVAL AND
COMPLIANCE WITH NOTICE

THIS DOCUMENT RELATES TO:

ALL ACTIONS

1. I am employed as a senior project manager of the Class Action Group at Kurtzman Carson Consultants (“KCC”). KCC serves as the Court-appointed Administrator of the settlements and litigation with Defendants Sony Pictures Animation, Inc. and Sony Pictures Imageworks, Inc. (“Sony”), Blue Sky Studios, Inc. (“Blue Sky”), Pixar, Lucasfilm Ltd., LLC (“Lucasfilm”), DreamWorks Animation SKG, Inc. (“DreamWorks”), The Walt Disney Company (“Disney”), and Two Pic MC LLC f/k/a ImageMovers Digital LLC (“IMD”). As the senior project manager at KCC, I oversee the administrative services provided in this matter. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. On July 6, 2016, KCC was appointed the Settlement Administrator in the *In re: Animation Workers Antitrust Litigation*. KCC received data from Pixar, Lucasfilm, DreamWorks Animation, Disney, Sony, Blue Sky, and IMD. The last of the initial set of employee data sent to

KCC was sent to KCC on July 27, 2016. Subsequent to the commencement of Notice, KCC received additional employee information and data and added 336 additional eligible Class Members. In total, KCC received contact information in the form of an email address and/or a street address for 11,045 Class Members.

3. On August 16, 2016, KCC sent the Email Notice to 2,665 Class Members. Prior to the Email Notice, KCC processed email addresses through a verification service to identify valid email addresses. The verification service identified 2,665 email addresses as valid emails. Of the 2,665 Email Notices sent to Class Members, 16 were returned as undeliverable and those Class Members were sent a Long Form Notice in the mail. A true and correct copy of the Email Notice is attached hereto as Exhibit A. On August 16, 2016, KCC commenced mailing the Long Form Notice to Settlement Class Members. In total, KCC mailed Long Form Notices to 8,396 unique Class Members. A true and correct copy of the Long Form Notice is attached hereto as Exhibit B.

4. 1,291 unique Class Members had their Long Form Notices returned as undeliverable. KCC ran a search for an updated address for Class Members whose Long Form Notice was returned as undeliverable, and updated and remailed the Long Form Notice to 1,074 Class Members. It is estimated that 10,828 or 98% of Settlement Class Members received either an Email Notice or Long Form Notice.

5. On August 16, 2016, the settlement website located at www.AnimationLawsuit.com was updated with copies of the Long Form Notice, answers to Frequently Asked Questions, and a page for Class Members to securely log in and update their contact information and view their eligible job positions. To date, there have been 6,503 visitors to the website.

6. On August 16, 2016, KCC established a toll free telephone number that Class Members could call and listen to answers to Frequently Asked Questions, request a Long Form Notice be mailed to them, and speak to a live operator during business hours. To date, there have been 261 calls to the toll free settlement line.

7. The deadline to submit a request for exclusion (“opt-out”) was September 30, 2016. To date, KCC has received four timely opt-outs, opting out of both settlements. A list of individuals opting out of the settlements is attached hereto as Exhibit C.

8. The deadline to submit an objection to the settlement was September 30, 2016. To date, KCC has received no objections to the settlement.

9. In sum, KCC has fully complied with the Court’s notice requirements, as outlined in the Court’s July 6, 2016 Preliminary Approval Order.

10. In addition to the incurred fees and expenses totaling \$36,062.92 that I provided in my previous declaration dated September 14, 2016, KCC estimates an additional \$59,432.17 will be incurred through initial distribution, for a total of \$95,495.09

11. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 12th day of October 2016 at San Rafael, California.

A handwritten signature in black ink, appearing to read "Kenneth Jue", written over a horizontal line.

Kenneth Jue

EXHIBIT A

Kenneth Jue

From: Class Action Administrator <donotreply@animationlawsuit.com>
Sent: Tuesday, August 16, 2016 6:01 PM
To: [REDACTED]
Subject: Legal Notification of Animation Workers Antitrust Litigation and Settlements

Please read the below Notice regarding the Animation Workers Antitrust Litigation and Settlements. If you want to view more information about this case, please visit www.animationlawsuit.com.

To be able to send you any monetary benefit from the settlement, the Class Action Administrator must have your current physical address. You are encouraged to update your physical address on the settlement website - www.animationlawsuit.com. You can do so by using the ID and access code listed below and by clicking the Log In link on the home page of www.animationlawsuit.com.

ID: 1 [REDACTED]
Access Code: 5 [REDACTED]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
**NOTICE OF PENDENCY OF CLASS ACTION LAWSUIT,
PROPOSED SETTLEMENTS,
FAIRNESS HEARING, AND RIGHT TO APPEAR**

IMPORTANT INFORMATION – READ CAREFULLY AND DO NOT DISCARD

If you were an employee who held an animation or visual effects job title at Blue Sky Studios, Inc., DreamWorks Animation SKG, Inc., Two Pic MC LLC (f/k/a Image Movers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, Sony Pictures Animation Inc., Sony Pictures Imageworks Inc., or The Walt Disney Company during the time periods set forth below, an ongoing class action lawsuit may affect your rights, and you could get money from settlements with two of the multiple defendants in the lawsuit.

A court authorized this Notice. This is not a solicitation from a lawyer.

This Notice describes the ongoing lawsuit and how you can continue in that lawsuit or exclude yourself from that lawsuit. This Notice also describes settlements with two of the defendants and how you may be eligible to get money from those settlements or exclude yourself from one or both of them.

BACKGROUND

- The class action lawsuit *In re Animation Workers Antitrust Litigation*, 14-cv-04062-LHK, claims that Blue Sky Studios, Inc. (“Blue Sky”), DreamWorks Animation SKG, Inc. (“DreamWorks Animation”), Two Pic MC LLC (f/k/a ImageMovers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, Sony Pictures Animation Inc. and Sony Pictures Imageworks Inc. (“Sony Pictures”), and The Walt Disney Company (collectively, the “Defendants”) violated federal and state antitrust laws by conspiring to suppress compensation by agreeing not to solicit each other’s employees and by coordinating compensation policies. Defendants

deny that they violated any antitrust law or engaged in any wrongdoing.

- The Honorable Lucy H. Koh of the United States District Court for the Northern District of California entered an order preliminarily approving settlements with two of the defendants in the lawsuit- Blue Sky and Sony Pictures- and certifying a Settlement Class of visual effects and animation employees who worked at any Defendant for defined periods *between 2001 and 2010*.
- Blue Sky has settled for \$5,950,000, and Sony Pictures has settled for \$13,000,000. The remaining defendants (DreamWorks Animation, Two Pic MC LLC (f/k/a ImageMovers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, and The Walt Disney Company) have not settled (collectively the “Non-Settling Defendants”). However, if you were an employee for *any* of the Defendants listed above and held an animation or visual effects job title during the time period listed below, you may be entitled to compensation. A list of job titles is in the [List of Job Titles by Defendant](#).
- If you are a Settlement Class Member, you have a right to participate in both Settlements.
- Judge Koh has also entered an order certifying a Litigation Class of visual effects and animation employees in the lawsuit who worked at any Defendant for defined periods *between 2004 and 2010*. This class of employees will continue the lawsuit against the Non-Settling Defendants. It is smaller than the settlement class because it excludes employees who worked for a Defendant between 2001 and 2003 but did not work for a Defendant during the defined periods between 2004 and 2010.
- This is not a lawsuit against you. Your participation in this lawsuit or acceptance of money from the Settlements will not affect your employment status or compensation in any way.
- **The purpose of this Notice is to advise you of your rights with respect to the ongoing lawsuit and the two settlements.** Please read it carefully. **This Notice explains your legal rights and options – and the deadlines to exercise them.** Your legal rights will be affected whether you act or don’t act, and you have choices to make now.
- **This Notice is divided into sections that apply to Settlement Class Members or Litigation Class Members or both.** Please read all of the Notice carefully, determine whether you are a member of both classes or just the Settlement Class, and then decide whether or not to exercise your rights and options.

Summary of Notice for Settlement Class Members

- You are a Settlement Class Member and are included in the two settlements with Sony Pictures and Blue Sky if you fall within the following definition: All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the [List of Job Titles by Defendant](#) during the following time periods: Pixar (2001-2010), Lucasfilm Ltd., LLC (2001-2010), DreamWorks Animation (2003-2010), The Walt Disney Company (2004-2010), Sony Pictures Animation or Sony Pictures Imageworks (2004-2010), Blue Sky (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks.
- You must have been an employee *and* held one or more of the job titles listed on the [List of Job Titles by Defendant](#) during the time periods above. You may not know what your job title was. If you have any questions about this, please contact phone number 855-730-8617 or

- **The Court in charge of this case still has to approve the two Settlements. Payment will be made if the Court approves one or both Settlements and orders that the Settlement Funds be distributed. Please be patient.**

SUMMARY OF YOUR LEGAL RIGHTS AS A SETTLEMENT CLASS MEMBER AND OPTIONS WITH RESPECT TO THE SETTLING DEFENDANTS	
DO NOTHING	You will receive a payment from the Settlements if you are a Settlement Class Member. You will receive money from the Settlements when the funds are distributed and will waive any rights to pursue a lawsuit of your own against Blue Sky or Sony Pictures. You will retain your claims against the other Defendants.
EXCLUDE YOURSELF FROM ONE OR BOTH OF THE SETTLEMENTS	Get no payment from the Settlements. This is the only way you can file your own lawsuit or ever be part of any other lawsuit about the claims in this case against Blue Sky or Sony Pictures. As described in Question 20, below, you may exclude yourself or “opt out” from one or both Settlements.
OBJECT TO OR COMMENT ON ONE OR BOTH OF THE SETTLEMENTS	Following the instructions in Question 23, write to the Court about why you like or do not like one or both of the Settlements by no later than September 30, 2016. You may also ask to speak to the Court about your written comments or objections about the fairness of one or both of the Settlements at the “Fairness Hearing” on November 10, 2016 at 1:30 p.m. , although you do not have to do so. To comment on or object to one or both of the Settlements and request to speak at the Fairness Hearing, you must act before September 30, 2016. Your objection must be signed, and must include a summary of any other objections you or your attorney filed to any class action settlements submitted to any court in the United States in the previous five years.
GO TO THE COURT’S FAIRNESS HEARING ABOUT THE SETTLEMENTS	If you would like, you can ask to speak in Court about the fairness of one or both of the Settlements if you follow the instructions in Question 24 of this Notice. You do not need to speak to the Court to receive benefits under the Settlements.

Summary of Notice for Litigation Class Members

- The lawsuit is continuing against DreamWorks Animation, Two Pic MC (f/k/a Image Movers Digital LLC), Lucasfilm, Pixar, and The Walt Disney Company, which are referred to here as the “Non-Settling Defendants.”
- You are a Litigation Class Member if you fall within the following definition: All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the [List of Job Titles by Defendant](#) during the

following time periods: Pixar (**2004**-2010), Lucasfilm Ltd., LLC (**2004**-2010), DreamWorks Animation (**2004**-2010), The Walt Disney Company (2004-2010), Sony Pictures Animation or Sony Pictures Imageworks (2004-2010), Blue Sky (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks.

- The Litigation Class is smaller than the Settlement Class. It is a subset. The differences with Settlement Class Definition are in **bold** and underlined. It is possible that you are a Settlement Class Member, but not a Litigation Class Member. However, if you are a Litigation Class Member, you are certainly a Settlement Class Member.
- The Litigation Class excludes employees who worked for a Defendant between 2001 and 2003 and who did not work for a Defendant during the defined periods between 2004 and 2010. If you held a qualifying job title at either Pixar or Lucasfilm between 2001 and 2003 or at DreamWorks Animation in 2003 (and did not work for any of those three companies from 2004 to 2010), you *are* a Settlement Class Member, but you *are not* a Litigation Class Member.
- **The outcome of the class action lawsuit against the Non-Settling Defendants is not yet known. If you are a Litigation Class Member, you will be notified if money or benefits are obtained from any of the Non-Settling Defendants through settlements or trial. Please be patient.**
- As a Litigation Class Member, you have the right to exclude yourself from the continuing lawsuit against the Non-Settling Defendants. If you choose to do so, you must exercise your right by September 30, 2016. Instructions on how to exclude yourself or opt out are set forth in response to Question 35 below. You can receive the benefits of one or both of the settlements with the Settling Defendants even if you opt out of the continuing lawsuit against the Non-Settling Defendants.

SUMMARY OF YOUR LEGAL RIGHTS AS A LITIGATION CLASS MEMBER AND OPTIONS WITH RESPECT TO THE NON-SETTLING DEFENDANTS	
DO NOTHING	If you are a Litigation Class Member and do nothing, you will remain a Litigation Class Member in the lawsuit against the Non-Settling Defendants and retain the possibility of getting money or other benefits from the Non-Settling Defendants that may come from trial or settlement. By remaining in the Litigation Class, you will be bound by the outcome of the continuing lawsuit with the Non-Settling Defendants and will give up your right to file your own lawsuit. There is no money available now from DreamWorks Animation, Two Pic (f/k/a Image Movers Digital), Lucasfilm, Pixar, or The Walt Disney Company, and no guarantee that there will be. The outcome of the continuing class action lawsuit against these Non-Settling Defendants is not yet known. If additional money or benefits are obtained from the Non-Settling Defendants, you will be notified again.

<p>EXCLUDE YOURSELF FROM THE ONGOING LAWSUIT</p>	<p>If you are a Litigation Class Member and exclude yourself or “opt out” from the ongoing lawsuit, you will receive no payment from any Non-Settling Defendants even if any monies are collected as the result of a trial or settlement, but you will retain the right to file your own lawsuit. You will remain in the Class on whose behalf the lawsuit will continue against the Non-Settling Defendants unless you submit a written request to exclude yourself or “opt out” from it as described in the response to Question 35 below. You must submit a timely written request to exclude yourself from the Class, if you wish to do so, by September 30, 2016. This is the only way that you can file your own lawsuit or ever be part of any other lawsuit about the legal claims in this case against any of the Non-Settling Defendants.</p>
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Detailed Information

The above bullet points and charts provide summary information regarding your rights and options as Settlement Class Members and Litigation Class Members as well as the settlements with the Settling Defendants and the ongoing lawsuit against the Non-Settling Defendants. The remainder of this Notice is designed to provide you with more information to help you evaluate your rights and options and answer any questions that you may have.

INFORMATION FOR SETTLEMENT CLASS MEMBERS AND LITIGATION CLASS MEMBERS

1. Why did I get this Notice?

You have received this Notice because Defendants’ records show you may have worked as an animation or visual effects employee and held one of the job titles listed on the [List of Job Titles by Defendants](#) during some or all of the following time periods:

- Pixar (2001-2010)
- Lucasfilm Ltd., LLC (including Industrial Light & Magic) (2001-2010)
- DreamWorks Animation SKG, Inc. (2003-2010)
- The Walt Disney Company (including Walt Disney Animation Studios) (2004-2010)
- Sony Pictures Animation Inc. or Sony Pictures Imageworks Inc. (2004-2010)
- Blue Sky Studios, Inc. (2005-2010)
- Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010)

The Court sent you this Notice for two reasons:

(1) Settlement Class Members have the right to know about the two proposed Settlements of this class action lawsuit with Blue Sky and Sony Pictures, and about their legal rights and options, before the Court holds a “Fairness Hearing” to decide whether to grant final approval of one or both of the Settlements.

This Notice explains the lawsuit, the Settlements, and your legal rights. It also explains what benefits from the Settlements will be available, who is eligible for them, and how to obtain them. If the Court approves one or both of the Settlements and orders that the Settlement Fund(s) be distributed, a Notice and Claims Administrator appointed by the Court will make the payments that the Settlements allow.

The Court has preliminarily approved the Settlements. If you are a Settlement Class Member, you have legal rights and options that you may exercise before the Court considers whether it will grant final approval of the proposed Settlements at the “Fairness Hearing.” The Court will hold the Fairness Hearing on **November 10, 2016 at 1:30 p.m.** in Courtroom 8, 4th Floor, of the Northern District of California, 280 South 1st Street, San Jose, CA 95113 to decide whether the proposed Settlements are fair and reasonable, and provide adequate compensation and benefits to the members of the Class. The date and time for the Fairness Hearing rarely change, but please check www.animationlawsuit.com or the District Court’s website for updated information.

If you wish to comment on or object to one or both of the Settlements, or to exclude yourself, or “opt out,” from one or both of the Settlements, you must do so following the procedures described below. If you do nothing, you will receive money from the Settlements and you will be bound by any final judgment.

(2) Litigation Class Members have the right to know that the Court has “certified” a Litigation Class to move the case forward against the Non-Settling Defendants, and about their legal rights and options before the claims being made on behalf of the Litigation Class are evaluated on their merits.

On May 25, 2016, Judge Koh decided that this lawsuit can proceed as a class action against the Non-Settling Defendants. A jury trial is scheduled to begin on June 12, 2017, before Judge Koh, at the United States District Court for the Northern District of California, San Jose Division. You will remain a Litigation Class Member in this continuing lawsuit if you do nothing or you can exclude yourself, or “opt out,” from this continuing lawsuit as explained in the response to Question 35 below. If you decide you want to exclude yourself, or opt out, you must submit a timely written request to do so by September 30, 2016.

2. What is this lawsuit about?

The lawsuit claims that Defendants conspired to suppress compensation by agreeing not to solicit each other’s employees and to coordinate compensation policies in violation of federal and state antitrust laws. Each of the Defendants, including Blue Sky and Sony Pictures, denies that it violated any laws or engaged in any wrongdoing. Blue Sky and Sony Pictures have entered into separate Settlement Agreements with Plaintiffs. The other Defendants (DreamWorks Animation, Two Pic (f/k/a Image Movers Digital), Lucasfilm, Pixar, and The Walt Disney Company) have not settled with the Plaintiffs, and the case against them continues. To obtain more information about the claims in this lawsuit, you can view the complaint and other court documents in this case at www.animationlawsuit.com.

3. What is a class action, and who is involved?

In a class action lawsuit, one or more persons called “Named Plaintiffs” or “Class Representatives” sue on behalf of other people who have similar claims. The people with similar claims together are a “Class” and are called “Class Members.” A class action resolves the issues for all Class Members, except for those who exclude themselves from the Class. The Court appointed Named Plaintiffs Georgia Cano, Robert Nitsch, and David Wentworth as Class Representatives in

4. Why are there Settlements with Blue Sky and Sony Pictures?

The Court has not found in favor of any party, including Plaintiffs, Blue Sky, Sony Pictures or the Non-Settling Defendants. Plaintiffs and Blue Sky, and separately Plaintiffs and Sony Pictures, have agreed to Settlement Agreements which, if they are approved, will bring the claims against Blue Sky and Sony Pictures to an end. (The Court could also choose to approve one Settlement Agreement, and not the other.) Settling the case avoids the uncertainty of continuing the case between them and the cost of further litigation, and Settlement Class Members will get the benefits of the Settlements. The Class Representatives and Class Counsel support the Settlements and believe they are in the best interests of the Class.

5. Why don't the Settlements end the case?

Although the Settlements with Blue Sky and Sony Pictures fully resolve the Settlement Class Members' claims against Blue Sky and Sony Pictures, respectively (as described in Question 16), the Settlements only partially resolve the case, as it will continue against the Non-Settling Defendants, as discussed in Question 6.

6. Is the lawsuit continuing?

Blue Sky and Sony Pictures have separately agreed to settle this case. The Non-Settling Defendants (DreamWorks Animation, Two Pic MC LLC (f/k/a Image Movers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, and The Walt Disney Company) have not agreed to settle, so the lawsuit will continue against them. More money may become available in the future for Litigation Class Members as a result of additional settlements with and/or a trial against the Non-Settling Defendants, but there is no guarantee this will happen.

7. What happens if the Plaintiffs later reach a settlement with the Non-Settling Defendants?

The settlements with Blue Sky and Sony Pictures do not end the case against the Non-Settling Defendants. It cannot be known whether the Plaintiffs would prevail against the Non-Settling Defendants at a trial. If there are additional settlements in the future, there will be notice of those settlements as well for Litigation Class Members.

INFORMATION FOR SETTLEMENT CLASS MEMBERS

8. Am I a Settlement Class Member?

Animation or visual effects employees who held specific job titles at one or more of the Defendant companies during certain time periods may be Settlement Class Members and eligible for a payment from the Settlements when the funds are distributed, if they meet the following class definition:

All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the attached [List of Job Titles by Defendant](#) during the following time periods: Pixar (2001-2010), Lucasfilm Ltd., LLC (2001-2010), DreamWorks Animation SKG, Inc. (2003-2010), The Walt Disney Company (2004-2010), Sony Pictures Animation Inc. and Sony Pictures Imageworks Inc. (2004-2010), Blue Sky Studios, Inc. (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks. ("Settlement Class")

To be in the Settlement Class and participate in either Settlement, you must have been an employee *and* held one or more of the job titles listed on the [List of Job Titles by Defendant](#) during the time periods above.

9. What if I still don't know if I'm a Settlement Class Member?

If you received this Notice, it is because you were listed as a potential Settlement Class Member. If you are still not sure whether you are included, you can get help at www.animationlawsuit.com or by calling 855-730-8617.

10. Does it make a difference whether I work or worked for Blue Sky or Sony Pictures, on the one hand, or DreamWorks Animation, Two Pic (f/k/a IMD), Lucasfilm, Pixar, or The Walt Disney Company, on the other hand?

As long as you fall within the definition of the Settlement Class in Question 8 above, you can participate in one or both of the Settlements, regardless of which Defendant you work or worked for, or whether you have worked for more than one. Current and former employees of Settling Defendants Blue Sky and Sony Pictures, and the Non-Settling Defendants (DreamWorks Animation, Two Pic/IMD, Lucasfilm, Pixar, Disney) who fall within the definition of the Settlement Class in Question 8 are all Settlement Class Members and are all entitled to receive a payment under the Settlements.

11. What are my rights as a Settlement Class Member?

If you are a Settlement Class Member, you have the right to (1) do nothing, in which case you will receive a payment and will waive any rights to pursue a lawsuit of your own against Blue Sky or Sony Pictures, (2) exclude yourself from one or both of the Settlements (see Question 20), (3) comment on or object to one or both of the Settlements (see Question 23), or (4) attend the Court's Fairness Hearing to speak in support of or against the Court's final approval of one or both of the Settlements (see Question 24).

THE SETTLEMENT BENEFITS

12. What do the Settlements provide?

As explained above, Blue Sky and Sony Pictures entered into separate Settlement Agreements that are independent of each other. Each is described below.

The Blue Sky Settlement

Blue Sky will pay \$5,950,000 into a Settlement Fund. After deducting attorneys' fees, costs, applicable taxes, and other fees and expenses (see Question 19), the Settlement Fund will be distributed to Settlement Class Members. In the event monies remain as residue in the Settlement Fund following all distribution efforts approved by the Court and payment of any taxes, Plaintiffs will ask the Court for an order disposing of all such funds, through additional distributions to eligible Settlement Class members and/or escheat to the federal government.

As a Settlement Class Member, you will give up, or "release," your claims against Blue Sky in exchange for the right to receive your share of the Blue Sky Settlement Fund. That release includes any claims made or that could have been made against Blue Sky arising from the facts alleged in this lawsuit. The release is described in more detail in the Settlement Agreement and in Question 16 below. You can view or download a copy of the Settlement Agreement at www.animationlawsuit.com.

The Sony Pictures Settlement

Sony Pictures will pay \$13,000,000 into a Settlement Fund. After deducting attorneys' fees, costs, applicable taxes, and other fees and expenses (see Question 19), the Settlement Fund will be distributed to Settlement Class Members. In the event monies remain as residue in the Settlement Fund following all distribution efforts approved by the Court and payment of any taxes, Plaintiffs will ask the Court for an order disposing of all such funds, through additional distributions to eligible Class members and/or escheat to the federal government.

As a Settlement Class Member, you will give up, or "release," your claims against Sony Pictures in exchange for the right to receive your share of the Sony Pictures Settlement Fund. That release includes any claims made or that could have been made against Sony Pictures arising from the facts alleged in this lawsuit. The release is described in more detail in the Settlement Agreement and in Question 16 below. You can view or download a copy of the Settlement Agreement at www.animationlawsuit.com.

13. How much money can I get from the Settlement?

Settlement Class Members who do not opt out will be eligible to receive a share of the Settlement Funds, less all applicable reductions based on a formula using the total compensation paid to a Settlement Class Member. In other words, each Settlement Class Member's share of the Settlement Funds is a fraction, with the Settlement Class Member's total compensation paid on the basis of employment in a Class Position during the Class Period as the numerator and the total compensation paid to all Settlement Class Members on the basis of employment in a Class Position during the Class Period as the denominator:

(Settlement Class Member's individual total compensation paid on the basis of employment in Class Positions during the Class Period)

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(Total compensation paid to Settlement Class Members on the basis of employment in Class Positions during the Class Period)

Each Settlement Class Member's fractional amount shall be multiplied against the Settlement Funds, less court-approved costs, and attorneys' fees and expenses. The total compensation paid, dates of employment, and whether a potential Settlement Class Member held a Class Position will be conclusively derived from Defendants' data maintained by their respective human resources departments and will not be subject to challenge by Settlement Class Members. Payments to Settlement Class Members shall not be made until the Effective Date has passed and all objections, collateral challenges or appeals relating to the Settlements have been fully and finally resolved. The proposed Plan of Allocation is available for review at www.animationlawsuit.com, and will be presented for approval by the Court at the Fairness Hearing (see Question 24).

RECEIVING MONEY FROM THE SETTLEMENTS

14. How can I get money from the Settlements?

You do not need to do anything to receive money from the Settlements. If you fall within the Settlement Class Definition and do not opt-out of the Settlements, you will receive money from the Settlements. If you exclude yourself from one or both of the Settlements, you will not receive money from that Settlement. You may opt out of one Settlement and not the other, or opt out of both.

15. When will I get my payments?

The Court will hold a Fairness Hearing on November 10, 2016 at 1:30 p.m. to decide whether to approve one or both of the Settlements. If the Court approves one or both of the Settlements, there

still may be appeals of that decision. If an appeal is filed, it is hard to estimate how long it might take for it to be resolved, but it can take a lot of time, perhaps more than a year. Settlement payments to Settlement Class Members will be distributed if the Settlements are approved, and after appeals, if any, are resolved. Updates regarding the Settlements and when payments may be made will be posted on the settlement website, www.animationlawsuit.com.

16. What am I giving up to get payments under the Settlements?

If you are a Settlement Class Member, unless you exclude yourself from the Settlements, you will remain within the Class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against Blue Sky or Sony Pictures or the Released Parties defined below about the claims in this case. It also means that all of the Court's orders will apply to you and legally bind you, and that you agree to the following "Release of Claims," which describes exactly the legal claims that you give up if you participate in the Settlements with respect to each Settling Defendant:

Blue Sky Studios Release

Upon the Effective Date, each Named Plaintiff and Settlement Class Member (who is not properly excluded as provided herein) (the "Releasers") shall release, forever discharge and covenant not to sue Blue Sky together with its parent company Fox Entertainment Group, LLC and their other past and present direct and indirect parents, subsidiaries, divisions, affiliates, stockholders, officers, directors, insurers, employees (other than employees who are members of the Class), agents, attorneys, and any of their legal representatives (and the predecessors, heirs, executors, administrators, successors, purchasers, and assigns of each of the foregoing) (the "Released Parties") from all claims, whether federal or state, known or unknown, asserted or unasserted, regardless of legal theory, arising from or related to the facts, activities or circumstances alleged in the SAC or any other purported restriction on competition for employment or compensation of Named Plaintiffs or Class Members, up to the Date of the Settlement (the "Released Claims"), whether or not alleged in the SAC and whether or not any Class Member objects to the Settlement. For the avoidance of doubt, this Agreement shall not be construed to release any local, state or federal claim arising out of allegations of any product defect, discrimination, or personal or bodily injury, and shall not be construed to release any local, state or federal claim arising out of allegations of unlawful overtime or violations of ERISA or similar statute that are unrelated to the facts, activities, or circumstances alleged in the SAC or to the payments or distributions made pursuant to this Settlement.

Sony Pictures Release

Upon the Effective Date, each Named Plaintiff and Settlement Class Member (who is not properly excluded as provided herein) (the "Releasers") shall release, forever discharge and covenant not to sue Sony Picture, Sony Pictures Entertainment Inc., and their past and present direct and indirect parents, subsidiaries, divisions, affiliates, stockholders, officers, directors, insurers, employees (other than employees who are members of the Class), agents, attorneys, and any of their legal representatives (and the predecessors, heirs, executors, administrators, successors, purchasers, and assigns of each of the foregoing) (the "Released Parties") from all claims, whether federal or state, known or unknown, asserted or unasserted, regardless of legal theory, arising from or related to the facts, activities or circumstances alleged in the SAC or any other purported restriction on competition for employment or compensation of Named Plaintiffs or Class Members, up to the Date of the Settlement (the "Released Claims"), whether or not alleged in the SAC and whether or not

any Class Member objects to the Settlement. For the avoidance of doubt, this Agreement shall not be construed to release any local, state or federal claim arising out of allegations of any product defect, discrimination, or personal or bodily injury, and shall not be construed to release any local, state or federal claim arising out of allegations of unlawful overtime or violations of ERISA or similar statute that are unrelated to the facts, activities, or circumstances alleged in the SAC or to the payments or distributions made pursuant to this Settlement.

THE LAWYERS REPRESENTING YOU AS A SETTLEMENT CLASS MEMBER

17. Who represents me as a Settlement Class Member in this case?

The Court appointed the following three law firms as Settlement Class Counsel to represent the Settlement Class:

<p>Daniel A. Small COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Ave. NW, Suite 500 Washington, DC 20005 animation@cohenmilstein.com 202-408-4600</p>	<p>Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 animation@hbsslaw.com 206-623-7292</p>	<p>Marc M. Seltzer SUSMAN GODFREY LLP 1901 Avenue of the Stars, Suite 950 Los Angeles, CA 90067-6029 mseltzer@susmangodfrey.com 310-789-3100</p>
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These lawyers and law firms are called “Plaintiffs’ Counsel.”

18. Should I get my own lawyer?

You do not need to hire your own lawyer because the Plaintiffs’ Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer’s services. For example, you can ask your lawyer to appear in Court for you if you want someone other than Plaintiffs’ Counsel to speak for you. You may also appear for yourself without a lawyer.

19. How will the lawyers be paid?

Plaintiffs’ Counsel may ask the Court to approve payment from the Settlement Funds for attorneys’ fees, which will not exceed 25 percent of the Settlement Funds. Plaintiffs’ Counsel will not receive any portion of their fees until the Court approves such a payment. Plaintiffs’ Counsel will also ask the Court to approve payment from the Settlement Funds for their out-of-pocket costs and expenses.

Plaintiffs’ Counsel will also ask the Court to approve payments of up to \$10,000 to each of the three individual Class Representatives as Service Awards for their service.

The costs of providing this Notice and administering the Settlements are being paid from the Settlement Funds. If the Court grants Counsel’s requests, all fees, costs, and expenses would be deducted from the Settlement Funds.

20. How do I get out of one or both of the Settlements?

If you fall within the Settlement Class Definition but don’t want a payment from one or both of the Settlements, or if you want to keep the right to sue or continue to sue Blue Sky and/or Sony Pictures about the issues in this case (at your own expense), then you must exclude yourself or “opt out” of the respective Settlement.

To exclude yourself, or opt out, from either of the Settlements, you must send a letter or written request to the Notice and Claims Administrator at the address below saying that you want to be excluded from the Settlement(s) in *In re: Animation Workers Antitrust Litigation*, with your full legal name and the name(s) of the Defendant company or companies (i.e., Blue Sky, DreamWorks Animation, Two Pic (f/k/a IMD), Lucasfilm, Pixar, Sony Pictures Animation, Sony Pictures Imageworks, or The Walt Disney Company) for which you worked during the Class period. You must sign your request, and identify which Settlement you wish to opt out of. You may also opt out of both.

To exclude yourself, or opt out, from one or both Settlements, you must submit your opt-out request letter postmarked no later than September 30, 2016 (or received by the Notice and Claims Administrator by that date if sent by fax or e-mail) to the following address:

Animation Workers Antitrust Litigation
c/o Kurtzman Carson Consultants ("KCC")
P.O. Box 6002
Larkspur, CA 94977-6002
info@animationlawsuit.com
Fax: 415-256-9756

You cannot exclude yourself, or opt out, by telephone.

If you request to be excluded from the Settlement with Blue Sky, you will not be legally bound by the Blue Sky Settlement. You will be able to sue (or continue to sue) Blue Sky in the future about the claims in this case. Similarly, if you request to be excluded from the Settlement with Sony Pictures, you will not be legally bound by the Sony Pictures Settlement. You will be able to sue (or continue to sue) Sony Pictures in the future about the claims in this case.

If you ask to be excluded from either Settlement, you will not receive payment from that Settlement, and you will not be able to object to it.

21. As a Settlement Class Member, if I don't exclude myself, can I sue the Settling Defendants for the same thing separately by myself?

No. If you are a Settlement Class Member, unless you exclude yourself from the Settlements, you give up the right to sue Blue Sky and Sony Pictures for the claims that the Settlement resolves as more fully described in Question 16 above.

If you have a pending lawsuit against Blue Sky, Fox Entertainment Group, LLC, or any related entities and/or Sony Pictures, Sony Pictures Entertainment Inc. or related entities or against any Released Parties defined above, speak to your lawyer in that lawsuit immediately, because you may need to exclude yourself to continue your own lawsuit. The process for excluding yourself from the Settlements is described in the preceding sections.

22. As a Settlement Class Member, if I exclude myself, can I get money from this case?

It depends on whether you as a Settlement Class Member exclude yourself from one or both Settlements, and/or as a possible Litigation Class Member (see below) from the ongoing lawsuit. If you exclude yourself from one of the Settlements, you will not receive money from the Settlement from which you have excluded yourself. If you exclude yourself from one Settlement, you may still receive payment from the other Settlement from which you did not exclude yourself. In addition, if you exclude yourself from one or both of the Settlements, and you are a Litigation Class Member, you may still receive payment from any future settlement with or recovery from a Non-Settling Defendant. If you are a Litigation Class Member and exclude yourself from the continuing litigation,

you will not be eligible to receive a share of the money recovered, if any, from Non-Settling Defendants in the future. However, by excluding yourself, you keep any rights to sue on your own about the same claims in the lawsuit should you want to do so.

COMMENTING ON OR OBJECTING TO THE SETTLEMENTS

23. How do I tell the Court that I like or don't like the proposed Settlements, and may I speak at the hearing?

If you are a Settlement Class Member, you can comment on or object to one or both of the settlements if you like or don't like any part of it and ask the Court to deny approval to one or both of the Settlements. You can give reasons why you think the Court should or should not approve them. You cannot ask the Court to order a larger settlement; the Court can only approve or deny the Settlements. If the Court denies approval of either Settlement, no settlement payments will be sent out with respect to that Settlement and the lawsuit will continue against that defendant. If that is what you want to happen, you must object.

All comments and objections must be in writing, signed, and must include the following:

- (a) your name, address, telephone number, email address and signature;
- (b) the case name and number (*In re Animation Workers Antitrust Litigation*, Case Number 14-cv-4062),
- (c) the identity of the Settlement(s) to which you are objecting;
- (d) a summary of any other objections you or an attorney on your behalf filed to any class action settlements submitted to any court in the United States in the previous five years; and
- (e) a detailed statement of your comments or objections, including the grounds for your objections, if any, together with any supporting documents.

All comments and objections must be submitted to the Court either by mailing them to Judge Koh's Case System Administrator, United States District Court for the Northern District of California, 280 South 1st Street, Room 2112, San Jose, CA 95113, or by filing them in person at any location of the United States District Court for the Northern District of California. Comments or objections must be filed or postmarked on or before September 30, 2016.

You do not need to attend or speak at the Fairness Hearing (described in Question 24 below) for your comments or objections to be considered. If you would like to speak at the Fairness Hearing about your comments or objections to the Settlements, please add to your letter a statement that you intend to appear and speak at the hearing, for example, by stating "This is my Notice of Intention to Appear at the Fairness Hearing for *In re Animation Workers Antitrust Litigation*."

If you choose to exclude yourself from either Settlement, you will have no right to speak at the hearing about that Settlement or object to it, because that Settlement will no longer affect your rights.

THE COURT'S FAIRNESS HEARING

24. When and where will the Court decide whether to approve the Settlements?

The Court will hold a Fairness Hearing at November 10, 2016 at 1:30 p.m. at the following courtroom:

The Honorable Lucy H. Koh
Courtroom 8, 4th Floor

The United States District Court for the Northern District of California

280 S. First Street

San Jose, California 95113

At this hearing, the Court will consider the Settlements separately and determine whether they are fair, reasonable, and adequate. If there are written comments or objections, the Court will consider them. The Court will decide whether to allow people who have raised objections or comments to speak at the hearing. The Court may also decide how much to award to Plaintiffs' Counsel in attorneys' fees and expenses and whether to approve the payment of Service Awards to the Class Representatives. After the hearing, the Court will decide whether to approve either or both Settlements. We do not know how long this decision will take.

Fairness Hearings are rarely rescheduled, but you should be sure to check the website, www.animationlawsuit.com, for news of any such changes.

25. Do I have to come to the Fairness Hearing?

No. Plaintiffs' Counsel will be present at the Fairness Hearing to answer any questions the Court may have. You are welcome to come at your own expense. If you send comments or objections to either Settlement, you don't have to come to Court to talk about it. As long as you mailed your written comments or objections on time, the Court will consider them. You may also pay your own lawyer to attend, but it is not required.

IF YOU DO NOTHING AS A SETTLEMENT CLASS MEMBER

26. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will get money from the Settlements and any claims you might have against Blue Sky and Sony Pictures and the Released Parties defined above in Question 16 based on the allegations in this case will be released unless you separately write to exclude yourself (following the instructions in Question 20). In exchange for receiving money from the Settlements, you will give up or "release" your claims against Blue Sky and Sony Pictures and the Released Parties in this lawsuit. You will not be able to participate in, or collect money damages from, any other lawsuit against Blue Sky or Sony Pictures or the Released Parties related to any alleged conspiracy to suppress compensation, including agreements to restrict recruiting or hiring or to coordinate compensation, including merit increase budgets and compensation ranges. (See Question 16 for the exact definition of the claims you are giving up.)

INFORMATION FOR LITIGATION CLASS MEMBERS

27. Am I a Litigation Class Member?

Animation or visual effects employees who held specific job titles at one or more of the Defendant companies during certain time periods may be Litigation Class Members if they meet the following class definition (the differences with Settlement Class Definition are in **bold** and underlined):

All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the attached [List of Job Titles by Defendant](#) during the following time periods: Pixar (**2004**-2010), Lucasfilm Ltd., LLC (**2004**-2010), DreamWorks Animation SKG, Inc. (**2004**-2010), The Walt Disney Company (2004-2010), Sony Pictures Animation Inc. and Sony Pictures Imageworks Inc. (2004-2010), Blue Sky Studios, Inc. (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class

are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks. (“Settlement Class”)

To be in the Litigation Class, you must have been an employee *and* held one or more of the job titles listed on the [List of Job Titles by Defendant](#) during the time periods above.

28. What is the difference between the Settlement Class and the Litigation Class?

The Litigation Class is smaller than the Settlement Class. It is a subset of the Settlement Class. The Litigation Class excludes employees who worked for a Defendant between 2001 and 2003 but did not work for a Defendant during the defined periods between 2004 and 2010. If you held a qualifying job title at either Pixar or Lucasfilm between 2001 and 2003 or at DreamWorks Animation in 2003 (and did not work for any of those three companies from 2004 to 2010), you *are* a Settlement Class Member, but you *are not* a Litigation Class Member.

It is possible that you are a Settlement Class Member, but not a Litigation Class Member. However, if you are a Litigation Class Member, you are certainly a Settlement Class Member.

29. What if I still don’t know if I’m a Litigation Class Member?

If you received this Notice, you may be a Litigation Class Member. If you are still not sure whether you are included, you can get help at www.animationlawsuit.com or by calling 855-730-8617.

30. Does it make a difference whether I work or worked for Blue Sky or Sony Pictures, on the one hand, or DreamWorks Animation, Two Pic (f/k/a IMD), Lucasfilm, Pixar, or The WaltDisney Company, on the other hand?

As long as you fall within the definition of the Litigation Class in Question 27 above, you can participate in, or choose to exclude yourself from, the ongoing lawsuit against the Non-Settling Defendants, regardless of which Defendant you work or worked for, or whether you have worked for more than one. Current and former employees of Settling Defendants Blue Sky and Sony Pictures, and the Non-Settling Defendants (DreamWorks Animation, Two Pic/IMD, Lucasfilm, Pixar, Disney) who fall within the definition of the Litigation Class in Question 27 are all Litigation Class Members.

31. What are my rights as a Litigation Class Member?

If you are a Litigation Class Member, you have the right to (1) do nothing, in which case you will be bound by the outcome of the litigation against the Non-Settling Defendants, including receiving payment that could result from trial or future settlements in this litigation against Non-Settling Defendants, or (2) exclude yourself from the ongoing lawsuit, in which case you preserve any right you may have to bring a lawsuit of your own – but give up the right to receive any payment that could result from trial or future settlements in this litigation with Non-Settling Defendants (see Question 35).

THE LAWYERS REPRESENTING YOU AS A LITIGATION CLASS MEMBER

32. Who represents me as a Litigation Class Member in this case?

The Court appointed the following three law firms as Class Counsel to represent the Litigation Class:

<p>Daniel A. Small COHEN MILSTEIN SELLERS & TOLL PLLC</p>	<p>Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP</p>	<p>Marc M. Seltzer SUSMAN GODFREY LLP 1901 Avenue of the Stars,</p>
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1100 New York Ave. NW, Suite 500 Washington, DC 20005 animation@cohenmilstein.com 202-408-4600	1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 animation@hbsslaw.com 206-623-7292	Suite 950 Los Angeles, CA 90067-6029 mseltzer@susmangodfrey.com 310-789-3100
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These lawyers and law firms are called “Plaintiffs’ Counsel.” They are the same lawyers who represent the Settlement Class.

33. Should I get my own lawyer?

You do not need to hire your own lawyer because the Plaintiffs’ Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer’s services. For example, you can ask your lawyer to appear in Court for you if you want someone other than Plaintiffs’ Counsel to speak for you. You may also appear for yourself without a lawyer.

34. How will the lawyers be paid?

For the Litigation Class moving forward, if another settlement is reached with any or all of the Non-Settling Defendants, or if Plaintiffs are successful at trial against the Non-Settling Defendants, Plaintiffs’ Counsel may ask the Court to approve a payment for attorney’s fees, out-of-pocket costs and expenses, and Service Awards from any recovery as well.

The costs of providing this Notice and administering the Settlements are being paid from the Settlement Funds. If the Court grants Counsel’s requests, all fees, costs, and expenses would be deducted from the Settlement Funds.

35. As a Litigation Class Member, how do I get out of the ongoing lawsuit?

If you fall within the Litigation Class definition but do not want to be included in the ongoing class action lawsuit against the Non-Settling Defendants then you must exclude yourself from or opt out of this lawsuit.

To exclude yourself from or opt out of the ongoing lawsuit against the Non-Settling Defendants, you must send a letter or other written request to the Notice and Claims Administrator saying that you want to be excluded from the Litigation Class in *In re: Animation Workers Antitrust Litigation*, with your full legal name and the name(s) of the Defendant company or companies for which you worked during the time frames specified above in Question 27. Your request must be postmarked no later than September 30, 2016 (or received by the Notice and Claims Administrator by that date if sent by fax or email). If you have any questions about how to submit this request, please call the Notice and Claims Administrator at the telephone number printed below.

If you request to be excluded from the ongoing lawsuit against the Non-Settling Defendants, you will not be legally bound by the Court’s judgments. If the Litigation Class gets money or benefits as a result of any settlement or trial between any of the Non-Settling Defendants and the Plaintiffs, you will not receive any of that money or those benefits. You will, however, be able to sue, or continue to sue, any of the Non-Settling Defendants about the same legal claims that are involved in this case. If you do exclude yourself from the ongoing lawsuit and pursue a separate lawsuit, you will need to retain your own lawyer for that case or prosecute the case without a lawyer.

To exclude yourself from the ongoing lawsuit against the Non-Settling Defendants, you must submit an opt-out letter postmarked no later than **September 30, 2016** (or received by the Notice and Claims Administrator by that date if sent by fax or email) to the following address:

Animation Workers Antitrust Litigation
c/o Kurtzman Carson Consultants ("KCC")
P.O. Box 6002
Larkspur, CA 94977-6002
info@animationlawsuit.com
Fax: 415-256-9756

You cannot exclude yourself or opt out by telephone.

36. As a Litigation Class Member, if I don't exclude myself, can I sue the Non-Settling Defendants for the same thing separately by myself?

No. If you are a Litigation Class Member, unless you exclude yourself from the Litigation Class, you give up the right to sue in your own separate lawsuit the Non-Settling Defendants for the claims at issue in this lawsuit.

If you have a pending lawsuit against the Non-Settling Defendants, speak to your lawyer in that lawsuit immediately, because you may need to exclude yourself to continue your own lawsuit. The process for excluding yourself from the Litigation Class is described in Question 35.

37. As a Litigation Class Member, if I exclude myself, can I get money from the ongoing case against the Non-Settling Defendants?

If you exclude yourself from the continuing litigation, you will not be eligible to receive a share of the money recovered, if any, from Non-Settling Defendants in the future. However, by excluding yourself, you keep any rights to sue on your own about the same claims in the lawsuit should you want to do so, subject to any defenses the Defendants would have.

TRIAL

38. When will the trial occur to resolve the claims in the ongoing lawsuit?

If the case against the Non-Settling Defendants is not dismissed or settled, a trial is set to begin on June 12, 2017, in Courtroom 8 – 4th floor of the Robert F. Peckham Federal Building, 280 South 1st Street, San Jose, CA, 95113. This trial may be moved to a different date or time without additional notice. The current schedule for the case will be posted at www.animationlawsuit.com.

39. Do I have to come to the trial?

You will not need to attend the trial unless you are a trial witness who volunteers or is asked to attend by one or more of the parties or by the Court. You and/or your own lawyer are welcome to attend. Check the website, www.animationlawsuit.com, to be kept informed of the trial schedule.

40. Will I get money after the trial?

There is no guarantee that Plaintiffs will obtain any money or benefits from the Non-Settling Defendants. Litigation Class Members will receive notice if Plaintiffs obtain money or benefits as a result of the trial or a settlement with one or more of the Non-Settling Defendants.

IF YOU DO NOTHING as a litigation class member

41. As a Litigation Class Member, what happens if I do nothing at all?

If you are a Litigation Class Member and you do nothing, you will remain in the ongoing class action lawsuit and retain the ability to recover money or other benefits, if any, that may come from a trial or a settlement with the Non-Settling Defendants unless you separately request to exclude yourself (following the instructions in Question 35). By staying in the case, you give up

your rights to sue any of the Non-Settling Defendants on your own about the same legal claims in this lawsuit and you will be bound by the results in the ongoing lawsuit.

Additional information for settlement class members
and litigation class members

YOUR PRIVACY

42. Will my manager know whether or how I responded to this Notice?

The Court has appointed an independent, experienced professional Notice and Claims Administrator, Kurtzman Carson Consultants (“KCC”). The Notice and Claims Administrator will establish and follow procedures to protect the confidentiality of the identity of persons receiving payments or opting out. The Notice and Claims Administrator will issue settlement checks. The list of those Settlement Class Members receiving checks will not be shared with Defendants, the Court, or Plaintiffs’ counsel.

The Notice and Claims Administrator will also receive requests to be excluded from the Settlements. The Notice and Claims Administrator will be required to share requests to be excluded from the Settlements with Class Counsel and counsel for the Defendants, as well as with the Court. Objections to the Settlements, as well as the names of those who opt out of the Settlements, will become part of the public record in the court file.

GETTING MORE INFORMATION

43. Are more details about the Settlements and the lawsuit available?

Yes. This notice summarizes the two proposed Settlements and the ongoing lawsuit against the Non-Settling Defendants. For the precise terms and conditions of the settlements, please see the settlement agreements available at www.animationlawsuit.com. For all of the documents filed with the Court in the lawsuit, you can also access the Court docket in this case through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>.

If you have additional questions, please contact the Notice and Claims Administrator:

Animation Workers Antitrust Litigation
c/o Kurtzman Carson Consultants ("KCC")
P.O. Box 40007
College Station, TX 77842-4007
info@animationlawsuit.com
855-730-8617

You can also contact Class Counsel whose information is below again:

<p>Daniel A. Small COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Ave. NW, Suite 500 Washington, DC 20005 animation@cohenmilstein.com 202-408-4600</p>	<p>Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 animation@hbsslaw.com 206-623-7292</p>	<p>Marc M. Seltzer SUSMAN GODFREY LLP 1901 Avenue of the Stars, Suite 950 Los Angeles, CA 90067-6029 mseltzer@susmangodfrey.com 310-789-3100</p>
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PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THESE SETTLEMENTS OR THE CLAIMS PROCESS.

EXHIBIT B

Animation Workers Antitrust Litigation
c/o Kurtzman Carson Consultants ("KCC")
P.O. Box 40007
College Station, TX 77842-4007

AWU

«Barcode»

Postal Service: Please do not mark barcode

Claim#: AWU-«Claim8» - «CkDig»

«First1» «Last1»

«Addr2»

«Addr1»

«City», «St» «Zip»

ID:««Claim8»»

Access Code: ««PIN»»

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

**NOTICE OF PENDENCY OF CLASS ACTION LAWSUIT,
PROPOSED SETTLEMENTS,**

FAIRNESS HEARING, AND RIGHT TO APPEAR

IMPORTANT INFORMATION – READ CAREFULLY AND DO NOT DISCARD

If you were an employee who held an animation or visual effects job title at Blue Sky Studios, Inc., DreamWorks Animation SKG, Inc., Two Pic MC LLC (f/k/a Image Movers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, Sony Pictures Animation Inc., Sony Pictures Imageworks Inc., or The Walt Disney Company during the time periods set forth below, an ongoing class action lawsuit may affect your rights, and you could get money from settlements with two of the multiple defendants in the lawsuit.

A court authorized this Notice. This is not a solicitation from a lawyer.

This Notice describes the ongoing lawsuit and how you can continue in that lawsuit or exclude yourself from that lawsuit. This Notice also describes settlements with two of the defendants and how you may be eligible to get money from those settlements or exclude yourself from one or both of them.

BACKGROUND

- The class action lawsuit *In re Animation Workers Antitrust Litigation*, 14-cv-04062-LHK, claims that Blue Sky Studios, Inc. (“Blue Sky”), DreamWorks Animation SKG, Inc. (“DreamWorks Animation”), Two Pic MC LLC (f/k/a ImageMovers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, Sony Pictures Animation Inc. and Sony Pictures Imageworks Inc. (“Sony Pictures”), and The Walt Disney Company (collectively, the “Defendants”) violated federal and state antitrust laws by conspiring to suppress compensation by agreeing not to solicit each other’s employees and by coordinating compensation policies. Defendants deny that they violated any antitrust law or engaged in any wrongdoing.
- The Honorable Lucy H. Koh of the United States District Court for the Northern District of California entered an order preliminarily approving settlements with two of the defendants in the lawsuit- Blue Sky and Sony Pictures- and certifying a Settlement Class of visual effects and animation employees who worked at any Defendant for defined periods *between 2001 and 2010*.
- Blue Sky has settled for \$5,950,000, and Sony Pictures has settled for \$13,000,000. The remaining defendants (DreamWorks Animation, Two Pic MC LLC (f/k/a ImageMovers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, and The Walt Disney Company) have not settled (collectively the “Non-Settling Defendants”). However, if you were an employee for *any* of the Defendants listed above and held an animation or visual effects job title during the time period listed below, you may be entitled to compensation. A list of job titles is attached in the List of Job Titles by Defendant.
- If you are a Settlement Class Member, you have a right to participate in both Settlements.
- Judge Koh has also entered an order certifying a Litigation Class of visual effects and animation employees in the lawsuit who worked at any Defendant for defined periods *between 2004 and 2010*. This class of employees will continue the lawsuit against the Non-Settling Defendants. It is smaller than the settlement class because it excludes employees who worked for a Defendant between 2001 and 2003 but did not work for a Defendant during the defined periods between 2004 and 2010.
- This is not a lawsuit against you. Your participation in this lawsuit or acceptance of money from the Settlements will not affect your employment status or compensation in any way.

- **The purpose of this Notice is to advise you of your rights with respect to the ongoing lawsuit and the two settlements.** Please read it carefully. **This Notice explains your legal rights and options – and the deadlines to exercise them.** Your legal rights will be affected whether you act or don't act, and you have choices to make now.
- **This Notice is divided into sections that apply to Settlement Class Members or Litigation Class Members or both.** Please read all of the Notice carefully, determine whether you are a member of both classes or just the Settlement Class, and then decide whether or not to exercise your rights and options.

Summary of Notice for Settlement Class Members

- You are a Settlement Class Member and are included in the two settlements with Sony Pictures and Blue Sky if you fall within the following definition: All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the attached List of Job Titles by Defendant during the following time periods: Pixar (2001-2010), Lucasfilm Ltd., LLC (2001-2010), DreamWorks Animation (2003-2010), The Walt Disney Company (2004-2010), Sony Pictures Animation or Sony Pictures Imageworks (2004-2010), Blue Sky (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks.
- You must have been an employee *and* held one or more of the job titles listed on the attached **List of Job Titles by Defendant** during the time periods above. You may not know what your job title was. If you have any questions about this, please contact phone number 855-730-8617 or visit the following website: www.animationlawsuit.com.
- **The Court in charge of this case still has to approve the two Settlements. Payment will be made if the Court approves one or both Settlements and orders that the Settlement Funds be distributed. Please be patient.**

SUMMARY OF YOUR LEGAL RIGHTS AS A SETTLEMENT CLASS MEMBER AND OPTIONS WITH RESPECT TO THE SETTLING DEFENDANTS	
DO NOTHING	You will receive a payment from the Settlements if you are a Settlement Class Member. You will receive money from the Settlements when the funds are distributed and will waive any rights to pursue a lawsuit of your own against Blue Sky or Sony Pictures. You will retain your claims against the other Defendants.
EXCLUDE YOURSELF FROM ONE OR BOTH OF THE SETTLEMENTS	Get no payment from the Settlements. This is the only way you can file your own lawsuit or ever be part of any other lawsuit about the claims in this case against Blue Sky or Sony Pictures. As described in Question 20, below, you may exclude yourself or “opt out” from one or both Settlements.
OBJECT TO OR COMMENT ON ONE OR BOTH OF THE SETTLEMENTS	Following the instructions in Question 23, write to the Court about why you like or do not like one or both of the Settlements by no later than September 30, 2016. You may also ask to speak to the Court about your written comments or objections about the fairness of one or both of the Settlements at the “Fairness Hearing” on November 10, 2016 at 1:30 p.m. , although you do not have to do so. To comment on or object to one or both of the Settlements and request to speak at the Fairness Hearing, you must act before September 30, 2016. Your objection must be signed, and must include a summary of any other objections you or your attorney filed to any class action settlements submitted to any court in the United States in the previous five years.
GO TO THE COURT’S FAIRNESS HEARING ABOUT THE SETTLEMENTS	If you would like, you can ask to speak in Court about the fairness of one or both of the Settlements if you follow the instructions in Question 24 of this Notice. You do not need to speak to the Court to receive benefits under the Settlements.

Summary of Notice for Litigation Class Members

- The lawsuit is continuing against DreamWorks Animation, Two Pic MC (f/k/a Image Movers Digital LLC), Lucasfilm, Pixar, and The Walt Disney Company, which are referred to here as the “Non-Settling Defendants.”
- You are a Litigation Class Member if you fall within the following definition: All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the attached List of Job Titles by Defendant during the following time periods: Pixar (~~2004~~-2010), Lucasfilm Ltd., LLC (~~2004~~-2010), DreamWorks Animation (~~2004~~-2010), The Walt Disney Company (2004-2010), Sony Pictures Animation or Sony Pictures Imageworks (2004-2010), Blue Sky (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks.

- The Litigation Class is smaller than the Settlement Class. It is a subset. The differences with Settlement Class Definition are in **bold** and underlined. It is possible that you are a Settlement Class Member, but not a Litigation Class Member. However, if you are a Litigation Class Member, you are certainly a Settlement Class Member.
- The Litigation Class excludes employees who worked for a Defendant between 2001 and 2003 and who did not work for a Defendant during the defined periods between 2004 and 2010. If you held a qualifying job title at either Pixar or Lucasfilm between 2001 and 2003 or at DreamWorks Animation in 2003 (and did not work for any of those three companies from 2004 to 2010), you *are* a Settlement Class Member, but you *are not* a Litigation Class Member.
- **The outcome of the class action lawsuit against the Non-Settling Defendants is not yet known. If you are a Litigation Class Member, you will be notified if money or benefits are obtained from any of the Non-Settling Defendants through settlements or trial. Please be patient.**
- As a Litigation Class Member, you have the right to exclude yourself from the continuing lawsuit against the Non-Settling Defendants. If you choose to do so, you must exercise your right by September 30, 2016. Instructions on how to exclude yourself or opt out are set forth in response to Question 35 below. You can receive the benefits of one or both of the settlements with the Settling Defendants even if you opt out of the continuing lawsuit against the Non-Settling Defendants.

SUMMARY OF YOUR LEGAL RIGHTS AS A LITIGATION CLASS MEMBER AND OPTIONS WITH RESPECT TO THE NON-SETTLING DEFENDANTS	
DO NOTHING	If you are a Litigation Class Member and do nothing, you will remain a Litigation Class Member in the lawsuit against the Non-Settling Defendants and retain the possibility of getting money or other benefits from the Non-Settling Defendants that may come from trial or settlement. By remaining in the Litigation Class, you will be bound by the outcome of the continuing lawsuit with the Non-Settling Defendants and will give up your right to file your own lawsuit. There is no money available now from DreamWorks Animation, Two Pic (f/k/a Image Movers Digital), Lucasfilm, Pixar, or The Walt Disney Company, and no guarantee that there will be. The outcome of the continuing class action lawsuit against these Non-Settling Defendants is not yet known. If additional money or benefits are obtained from the Non-Settling Defendants, you will be notified again.
EXCLUDE YOURSELF FROM THE ONGOING LAWSUIT	If you are a Litigation Class Member and exclude yourself or “opt out” from the ongoing lawsuit, you will receive no payment from any Non-Settling Defendants even if any monies are collected as the result of a trial or settlement, but you will retain the right to file your own lawsuit. You will remain in the Class on whose behalf the lawsuit will continue against the Non-Settling Defendants unless you submit a written request to exclude yourself or “opt out” from it as described in the response to Question 35 below. You must submit a timely written request to exclude yourself from the Class, if you wish to do so, by September 30, 2016. This is the only way that you can file your own lawsuit or ever be part of any other lawsuit about the legal claims in this case against any of the Non-Settling Defendants.

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Detailed Information

The above bullet points and charts provide summary information regarding your rights and options as Settlement Class Members and Litigation Class Members as well as the settlements with the Settling Defendants and the ongoing lawsuit against the Non-Settling Defendants. The remainder of this Notice is designed to provide you with more information to help you evaluate your rights and options and answer any questions that you may have.

INFORMATION FOR SETTLEMENT CLASS MEMBERS AND LITIGATION CLASS MEMBERS

1. Why did I get this Notice?

You have received this Notice because Defendants’ records show you may have worked as an animation or visual effects employee and held one of the job titles listed on the attached List of Job Titles by Defendants during some or all of the following time periods:

- Pixar (2001-2010)
- Lucasfilm Ltd., LLC (including Industrial Light & Magic) (2001-2010)
- DreamWorks Animation SKG, Inc. (2003-2010)
- The Walt Disney Company (including Walt Disney Animation Studios) (2004-2010)

- Sony Pictures Animation Inc. or Sony Pictures Imageworks Inc. (2004-2010)
- Blue Sky Studios, Inc. (2005-2010)
- Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010)

The Court sent you this Notice for two reasons:

(1) Settlement Class Members have the right to know about the two proposed Settlements of this class action lawsuit with Blue Sky and Sony Pictures, and about their legal rights and options, before the Court holds a “Fairness Hearing” to decide whether to grant final approval of one or both of the Settlements.

This Notice explains the lawsuit, the Settlements, and your legal rights. It also explains what benefits from the Settlements will be available, who is eligible for them, and how to obtain them. If the Court approves one or both of the Settlements and orders that the Settlement Fund(s) be distributed, a Notice and Claims Administrator appointed by the Court will make the payments that the Settlements allow.

The Court has preliminarily approved the Settlements. If you are a Settlement Class Member, you have legal rights and options that you may exercise before the Court considers whether it will grant final approval of the proposed Settlements at the “Fairness Hearing.” The Court will hold the Fairness Hearing on **November 10, 2016 at 1:30 p.m.** in Courtroom 8, 4th Floor, of the Northern District of California, 280 South 1st Street, San Jose, CA 95113 to decide whether the proposed Settlements are fair and reasonable, and provide adequate compensation and benefits to the members of the Class. The date and time for the Fairness Hearing rarely change, but please check www.animationlawsuit.com or the District Court’s website for updated information.

If you wish to comment on or object to one or both of the Settlements, or to exclude yourself, or “opt out,” from one or both of the Settlements, you must do so following the procedures described below. If you do nothing, you will receive money from the Settlements and you will be bound by any final judgment.

(2) Litigation Class Members have the right to know that the Court has “certified” a Litigation Class to move the case forward against the Non-Settling Defendants, and about their legal rights and options before the claims being made on behalf of the Litigation Class are evaluated on their merits.

On May 25, 2016, Judge Koh decided that this lawsuit can proceed as a class action against the Non-Settling Defendants. A jury trial is scheduled to begin on June 12, 2017, before Judge Koh, at the United States District Court for the Northern District of California, San Jose Division. You will remain a Litigation Class Member in this continuing lawsuit if you do nothing or you can exclude yourself, or “opt out,” from this continuing lawsuit as explained in the response to Question 35 below. If you decide you want to exclude yourself, or opt out, you must submit a timely written request to do so by September 30, 2016.

2. What is this lawsuit about?

The lawsuit claims that Defendants conspired to suppress compensation by agreeing not to solicit each other’s employees and to coordinate compensation policies in violation of federal and state antitrust laws. Each of the Defendants, including Blue Sky and Sony Pictures, denies that it violated any laws or engaged in any wrongdoing. Blue Sky and Sony Pictures have entered into separate Settlement Agreements with Plaintiffs. The other Defendants (DreamWorks Animation, Two Pic (f/k/a Image Movers Digital), Lucasfilm, Pixar, and The Walt Disney Company) have not settled with the Plaintiffs, and the case against them continues. To obtain more information about the claims in this lawsuit, you can view the complaint and other court documents in this case at www.animationlawsuit.com.

3. What is a class action, and who is involved?

In a class action lawsuit, one or more persons called “Named Plaintiffs” or “Class Representatives” sue on behalf of other people who have similar claims. The people with similar claims together are a “Class” and are called “Class Members.” A class action resolves the issues for all Class Members, except for those who exclude themselves from the Class. The Court appointed Named Plaintiffs Georgia Cano, Robert Nitsch, and David Wentworth as Class Representatives in this case.

4. Why are there Settlements with Blue Sky and Sony Pictures?

The Court has not found in favor of any party, including Plaintiffs, Blue Sky, Sony Pictures or the Non-Settling Defendants. Plaintiffs and Blue Sky, and separately Plaintiffs and Sony Pictures, have agreed to Settlement Agreements which, if they are approved, will bring the claims against Blue Sky and Sony Pictures to an end. (The Court could also choose to approve one Settlement Agreement, and not the other.) Settling the case avoids the uncertainty of continuing the case between them and the cost of further litigation, and Settlement Class Members will get the benefits of the Settlements. The Class Representatives and Class Counsel support the Settlements and believe they are in the best interests of the Class.

5. Why don’t the Settlements end the case?

Although the Settlements with Blue Sky and Sony Pictures fully resolve the Settlement Class Members’ claims against Blue Sky and Sony Pictures, respectively (as described in Question 16), the Settlements only partially resolve the case, as it will continue against the Non-Settling Defendants, as discussed in Question 6.

6. Is the lawsuit continuing?

Blue Sky and Sony Pictures have separately agreed to settle this case. The Non-Settling Defendants (DreamWorks Animation, Two Pic MC LLC (f/k/a Image Movers Digital LLC), Lucasfilm, Ltd., LLC, Pixar, and The Walt Disney Company) have not agreed to settle, so the lawsuit will continue against them. More money may become available in the future for Litigation Class Members as a result of additional settlements with and/or a trial against the Non-Settling Defendants, but there is no guarantee this will happen.

7. What happens if the Plaintiffs later reach a settlement with the Non-Settling Defendants?

The settlements with Blue Sky and Sony Pictures do not end the case against the Non-Settling Defendants. It cannot be known whether the Plaintiffs would prevail against the Non-Settling Defendants at a trial. If there are additional settlements in the future, there will be notice of those settlements as well for Litigation Class Members.

INFORMATION FOR SETTLEMENT CLASS MEMBERS

8. Am I a Settlement Class Member?

Animation or visual effects employees who held specific job titles at one or more of the Defendant companies during certain time periods may be Settlement Class Members and eligible for a payment from the Settlements when the funds are distributed, if they meet the following class definition:

All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the attached List of Job Titles by Defendant during the following time periods: Pixar (2001-2010), Lucasfilm Ltd., LLC (2001-2010), DreamWorks Animation SKG, Inc. (2003-2010), The Walt Disney Company (2004-2010), Sony Pictures Animation Inc. and Sony Pictures Imageworks Inc. (2004-2010), Blue Sky Studios, Inc. (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks. ("Settlement Class")

To be in the Settlement Class and participate in either Settlement, you must have been an employee *and* held one or more of the job titles listed on the attached **List of Job Titles by Defendant** during the time periods above.

9. What if I still don't know if I'm a Settlement Class Member?

If you received this Notice, it is because you were listed as a potential Settlement Class Member. If you are still not sure whether you are included, you can get help at www.animationlawsuit.com or by calling **855-730-8617**.

10. Does it make a difference whether I work or worked for Blue Sky or Sony Pictures, on the one hand, or DreamWorks Animation, Two Pic (f/k/a IMD), Lucasfilm, Pixar, or The Walt Disney Company, on the other hand?

As long as you fall within the definition of the Settlement Class in Question 8 above, you can participate in one or both of the Settlements, regardless of which Defendant you work or worked for, or whether you have worked for more than one. Current and former employees of Settling Defendants Blue Sky and Sony Pictures, and the Non-Settling Defendants (DreamWorks Animation, Two Pic/IMD, Lucasfilm, Pixar, Disney) who fall within the definition of the Settlement Class in Question 8 are all Settlement Class Members and are all entitled to receive a payment under the Settlements.

11. What are my rights as a Settlement Class Member?

If you are a Settlement Class Member, you have the right to (1) do nothing, in which case you will receive a payment and will waive any rights to pursue a lawsuit of your own against Blue Sky or Sony Pictures, (2) exclude yourself from one or both of the Settlements (see Question 20), (3) comment on or object to one or both of the Settlements (see Question 23), or (4) attend the Court's Fairness Hearing to speak in support of or against the Court's final approval of one or both of the Settlements (see Question 24).

THE SETTLEMENT BENEFITS

12. What do the Settlements provide?

As explained above, Blue Sky and Sony Pictures entered into separate Settlement Agreements that are independent of each other. Each is described below.

The Blue Sky Settlement

Blue Sky will pay \$5,950,000 into a Settlement Fund. After deducting attorneys' fees, costs, applicable taxes, and other fees and expenses (see Question 19), the Settlement Fund will be distributed to Settlement Class Members. In the event monies remain as residue in the Settlement Fund following all distribution efforts approved by the Court and payment of any taxes, Plaintiffs will ask the Court for an order disposing of all such funds, through additional distributions to eligible Settlement Class members and/or escheat to the federal government.

As a Settlement Class Member, you will give up, or “release,” your claims against Blue Sky in exchange for the right to receive your share of the Blue Sky Settlement Fund. That release includes any claims made or that could have been made against Blue Sky arising from the facts alleged in this lawsuit. The release is described in more detail in the Settlement Agreement and in Question 16 below. You can view or download a copy of the Settlement Agreement at www.animationlawsuit.com.

The Sony Pictures Settlement

Sony Pictures will pay \$13,000,000 into a Settlement Fund. After deducting attorneys’ fees, costs, applicable taxes, and other fees and expenses (see Question 19), the Settlement Fund will be distributed to Settlement Class Members. In the event monies remain as residue in the Settlement Fund following all distribution efforts approved by the Court and payment of any taxes, Plaintiffs will ask the Court for an order disposing of all such funds, through additional distributions to eligible Class members and/or escheat to the federal government.

As a Settlement Class Member, you will give up, or “release,” your claims against Sony Pictures in exchange for the right to receive your share of the Sony Pictures Settlement Fund. That release includes any claims made or that could have been made against Sony Pictures arising from the facts alleged in this lawsuit. The release is described in more detail in the Settlement Agreement and in Question 16 below. You can view or download a copy of the Settlement Agreement at www.animationlawsuit.com.

13. How much money can I get from the Settlement?

Settlement Class Members who do not opt out will be eligible to receive a share of the Settlement Funds, less all applicable reductions based on a formula using the total compensation paid to a Settlement Class Member. In other words, each Settlement Class Member’s share of the Settlement Funds is a fraction, with the Settlement Class Member’s total compensation paid on the basis of employment in a Class Position during the Class Period as the numerator and the total compensation paid to all Settlement Class Members on the basis of employment in a Class Position during the Class Period as the denominator:

(Settlement Class Member’s individual total compensation paid on the basis of employment in Class Positions during the Class Period)

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(Total compensation paid to Settlement Class Members on the basis of employment in Class Positions during the Class Period)

Each Settlement Class Member’s fractional amount shall be multiplied against the Settlement Funds, less court-approved costs, and attorneys’ fees and expenses. The total compensation paid, dates of employment, and whether a potential Settlement Class Member held a Class Position will be conclusively derived from Defendants’ data maintained by their respective human resources departments and will not be subject to challenge by Settlement Class Members. Payments to Settlement Class Members shall not be made until the Effective Date has passed and all objections, collateral challenges or appeals relating to the Settlements have been fully and finally resolved. The proposed Plan of Allocation is available for review at www.animationlawsuit.com, and will be presented for approval by the Court at the Fairness Hearing (see Question 24).

RECEIVING MONEY FROM THE SETTLEMENTS

14. How can I get money from the Settlements?

You do not need to do anything to receive money from the Settlements. If you fall within the Settlement Class Definition and do not opt-out of the Settlements, you will receive money from the Settlements. If you exclude yourself from one or both of the Settlements, you will not receive money from that Settlement. You may opt out of one Settlement and not the other, or opt out of both.

15. When will I get my payments?

The Court will hold a Fairness Hearing on November 10, 2016 at 1:30 p.m. to decide whether to approve one or both of the Settlements. If the Court approves one or both of the Settlements, there still may be appeals of that decision. If an appeal is filed, it is hard to estimate how long it might take for it to be resolved, but it can take a lot of time, perhaps more than a year. Settlement payments to Settlement Class Members will be distributed if the Settlements are approved, and after appeals, if any, are resolved. Updates regarding the Settlements and when payments may be made will be posted on the settlement website, www.animationlawsuit.com.

16. What am I giving up to get payments under the Settlements?

If you are a Settlement Class Member, unless you exclude yourself from the Settlements, you will remain within the Class, and that means that you can’t sue, continue to sue, or be part of any other lawsuit against Blue Sky or Sony Pictures or the Released Parties defined below about the claims in this case. It also means that all of the Court’s orders will apply to you and legally bind you, and that you agree to the following “Release of Claims,” which describes exactly the legal claims that you give up if you participate in the Settlements with respect to each Settling Defendant:

Blue Sky Studios Release

Upon the Effective Date, each Named Plaintiff and Settlement Class Member (who is not properly excluded as provided herein) (the “Releasers”) shall release, forever discharge and covenant not to sue Blue Sky together with its parent company Fox Entertainment Group, LLC and their other past and present direct and indirect parents, subsidiaries, divisions, affiliates, stockholders, officers, directors, insurers, employees (other than employees who are members of the Class), agents, attorneys, and any of their legal representatives (and the predecessors, heirs, executors, administrators, successors, purchasers, and assigns of each of the foregoing) (the “Released Parties”) from all claims, whether federal or state, known or unknown, asserted or unasserted, regardless of legal theory, arising from or related to the facts, activities or circumstances alleged in the SAC or any other purported restriction on competition for employment or compensation of Named Plaintiffs or Class Members, up to the Date of the Settlement (the “Released Claims”), whether or not alleged in the SAC and whether or not any Class Member objects to the Settlement. For the avoidance of doubt, this Agreement shall not be construed to release any local, state or federal claim arising out of allegations of any product defect, discrimination, or personal or bodily injury, and shall not be construed to release any local, state or federal claim arising out of allegations of unlawful overtime or violations of ERISA or similar statute that are unrelated to the facts, activities, or circumstances alleged in the SAC or to the payments or distributions made pursuant to this Settlement.

Sony Pictures Release

Upon the Effective Date, each Named Plaintiff and Settlement Class Member (who is not properly excluded as provided herein) (the “Releasers”) shall release, forever discharge and covenant not to sue Sony Picture, Sony Pictures Entertainment Inc., and their past and present direct and indirect parents, subsidiaries, divisions, affiliates, stockholders, officers, directors, insurers, employees (other than employees who are members of the Class), agents, attorneys, and any of their legal representatives (and the predecessors, heirs, executors, administrators, successors, purchasers, and assigns of each of the foregoing) (the “Released Parties”) from all claims, whether federal or state, known or unknown, asserted or unasserted, regardless of legal theory, arising from or related to the facts, activities or circumstances alleged in the SAC or any other purported restriction on competition for employment or compensation of Named Plaintiffs or Class Members, up to the Date of the Settlement (the “Released Claims”), whether or not alleged in the SAC and whether or not any Class Member objects to the Settlement. For the avoidance of doubt, this Agreement shall not be construed to release any local, state or federal claim arising out of allegations of any product defect, discrimination, or personal or bodily injury, and shall not be construed to release any local, state or federal claim arising out of allegations of unlawful overtime or violations of ERISA or similar statute that are unrelated to the facts, activities, or circumstances alleged in the SAC or to the payments or distributions made pursuant to this Settlement.

THE LAWYERS REPRESENTING YOU AS A SETTLEMENT CLASS MEMBER

17. Who represents me as a Settlement Class Member in this case?

The Court appointed the following three law firms as Settlement Class Counsel to represent the Settlement Class:

<p>Daniel A. Small COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Ave. NW, Suite 500 Washington, DC 20005 animation@cohenmilstein.com 202-408-4600</p>	<p>Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 animation@hbsslaw.com 206-623-7292</p>	<p>Marc M. Seltzer SUSMAN GODFREY LLP 1901 Avenue of the Stars, Suite 950 Los Angeles, CA 90067-6029 mseltzer@susmangodfrey.com 310-789-3100</p>
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These lawyers and law firms are called “Plaintiffs’ Counsel.”

18. Should I get my own lawyer?

You do not need to hire your own lawyer because the Plaintiffs’ Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer’s services. For example, you can ask your lawyer to appear in Court for you if you want someone other than Plaintiffs’ Counsel to speak for you. You may also appear for yourself without a lawyer.

19. How will the lawyers be paid?

Plaintiffs’ Counsel may ask the Court to approve payment from the Settlement Funds for attorneys’ fees, which will not exceed 25 percent of the Settlement Funds. Plaintiffs’ Counsel will not receive any portion of their fees until the Court approves such a payment. Plaintiffs’ Counsel will also ask the Court to approve payment from the Settlement Funds for their out-of-pocket costs and expenses.

Plaintiffs’ Counsel will also ask the Court to approve payments of up to \$10,000 to each of the three individual Class Representatives as Service Awards for their service.

The costs of providing this Notice and administering the Settlements are being paid from the Settlement Funds. If the Court grants Counsel's requests, all fees, costs, and expenses would be deducted from the Settlement Funds.

20. How do I get out of one or both of the Settlements?

If you fall within the Settlement Class Definition but don't want a payment from one or both of the Settlements, or if you want to keep the right to sue or continue to sue Blue Sky and/or Sony Pictures about the issues in this case (at your own expense), then you must exclude yourself or "opt out" of the respective Settlement.

To exclude yourself, or opt out, from either of the Settlements, you must send a letter or written request to the Notice and Claims Administrator at the address below saying that you want to be excluded from the Settlement(s) in *In re: Animation Workers Antitrust Litigation*, with your full legal name and the name(s) of the Defendant company or companies (i.e., Blue Sky, DreamWorks Animation, Two Pic (f/k/a IMD), Lucasfilm, Pixar, Sony Pictures Animation, Sony Pictures Imageworks, or The Walt Disney Company) for which you worked during the Class period. You must sign your request, and identify which Settlement you wish to opt out of. You may also opt out of both.

To exclude yourself, or opt out, from one or both Settlements, you must submit your opt-out request letter postmarked no later than September 30, 2016 (or received by the Notice and Claims Administrator by that date if sent by fax or e-mail) to the following address:

Animation Workers Antitrust Litigation
c/o Kurtzman Carson Consultants ("KCC")
P.O. Box 6002
Larkspur, CA 94977-6002
info@animationlawsuit.com
Fax: 415-256-9756

You cannot exclude yourself, or opt out, by telephone.

If you request to be excluded from the Settlement with Blue Sky, you will not be legally bound by the Blue Sky Settlement. You will be able to sue (or continue to sue) Blue Sky in the future about the claims in this case. Similarly, if you request to be excluded from the Settlement with Sony Pictures, you will not be legally bound by the Sony Pictures Settlement. You will be able to sue (or continue to sue) Sony Pictures in the future about the claims in this case.

If you ask to be excluded from either Settlement, you will not receive payment from that Settlement, and you will not be able to object to it.

21. As a Settlement Class Member, if I don't exclude myself, can I sue the Settling Defendants for the same thing separately by myself?

No. If you are a Settlement Class Member, unless you exclude yourself from the Settlements, you give up the right to sue Blue Sky and Sony Pictures for the claims that the Settlement resolves as more fully described in Question 16 above.

If you have a pending lawsuit against Blue Sky, Fox Entertainment Group, LLC, or any related entities and/or Sony Pictures, Sony Pictures Entertainment Inc. or related entities or against any Released Parties defined above, speak to your lawyer in that lawsuit immediately, because you may need to exclude yourself to continue your own lawsuit. The process for excluding yourself from the Settlements is described in the preceding sections.

22. As a Settlement Class Member, if I exclude myself, can I get money from this case?

It depends on whether you as a Settlement Class Member exclude yourself from one or both Settlements, and/or as a possible Litigation Class Member (see below) from the ongoing lawsuit. If you exclude yourself from one of the Settlements, you will not receive money from the Settlement from which you have excluded yourself. If you exclude yourself from one Settlement, you may still receive payment from the other Settlement from which you did not exclude yourself. In addition, if you exclude yourself from one or both of the Settlements, and you are a Litigation Class Member, you may still receive payment from any future settlement with or recovery from a Non-Settling Defendant. If you are a Litigation Class Member and exclude yourself from the continuing litigation, you will not be eligible to receive a share of the money recovered, if any, from Non-Settling Defendants in the future. However, by excluding yourself, you keep any rights to sue on your own about the same claims in the lawsuit should you want to do so.

COMMENTING ON OR OBJECTING TO THE SETTLEMENTS

23. How do I tell the Court that I like or don't like the proposed Settlements, and may I speak at the hearing?

If you are a Settlement Class Member, you can comment on or object to one or both of the settlements if you like or don't like any part of it and ask the Court to deny approval to one or both of the Settlements. You can give reasons why you think the Court should or should not approve them. You cannot ask the Court to order a larger settlement; the Court can only approve or deny the Settlements. If the Court denies approval of either Settlement, no settlement payments will be sent out with respect to that Settlement and the lawsuit will continue against that defendant. If that is what you want to happen, you must object.

All comments and objections must be in writing, signed, and must include the following:

(a) your name, address, telephone number, email address and signature;

(b) the case name and number (*In re Animation Workers Antitrust Litigation*, Case Number 14-cv-4062),

(c) the identity of the Settlement(s) to which you are objecting;

(d) a summary of any other objections you or an attorney on your behalf filed to any class action settlements submitted to any court in the United States in the previous five years; and

(e) a detailed statement of your comments or objections, including the grounds for your objections, if any, together with any supporting documents.

All comments and objections must be submitted to the Court either by mailing them to Judge Koh's Case System Administrator, United States District Court for the Northern District of California, 280 South 1st Street, Room 2112, San Jose, CA 95113, or by filing them in person at any location of the United States District Court for the Northern District of California. Comments or objections must be filed or postmarked on or before September 30, 2016.

You do not need to attend or speak at the Fairness Hearing (described in Question 24 below) for your comments or objections to be considered. If you would like to speak at the Fairness Hearing about your comments or objections to the Settlements, please add to your letter a statement that you intend to appear and speak at the hearing, for example, by stating "This is my Notice of Intention to Appear at the Fairness Hearing for *In re Animation Workers Antitrust Litigation*."

If you choose to exclude yourself from either Settlement, you will have no right to speak at the hearing about that Settlement or object to it, because that Settlement will no longer affect your rights.

THE COURT'S FAIRNESS HEARING

24. When and where will the Court decide whether to approve the Settlements?

The Court will hold a Fairness Hearing at November 10, 2016 at 1:30 p.m. at the following courtroom:

The Honorable Lucy H. Koh
Courtroom 8, 4th Floor
The United States District Court for the Northern District of California
280 S. First Street
San Jose, California 95113

At this hearing, the Court will consider the Settlements separately and determine whether they are fair, reasonable, and adequate. If there are written comments or objections, the Court will consider them. The Court will decide whether to allow people who have raised objections or comments to speak at the hearing. The Court may also decide how much to award to Plaintiffs' Counsel in attorneys' fees and expenses and whether to approve the payment of Service Awards to the Class Representatives. After the hearing, the Court will decide whether to approve either or both Settlements. We do not know how long this decision will take.

Fairness Hearings are rarely rescheduled, but you should be sure to check the website, www.animationlawsuit.com, for news of any such changes.

25. Do I have to come to the Fairness Hearing?

No. Plaintiffs' Counsel will be present at the Fairness Hearing to answer any questions the Court may have. You are welcome to come at your own expense. If you send comments or objections to either Settlement, you don't have to come to Court to talk about it. As long as you mailed your written comments or objections on time, the Court will consider them. You may also pay your own lawyer to attend, but it is not required.

IF YOU DO NOTHING AS A SETTLEMENT CLASS MEMBER

26. What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will get money from the Settlements and any claims you might have against Blue Sky and Sony Pictures and the Released Parties defined above in Question 16 based on the allegations in this case will be released unless you separately write to exclude yourself (following the instructions in Question 20). In exchange for receiving money from the Settlements, you will give up or "release" your claims against Blue Sky and Sony Pictures and the Released Parties in this lawsuit. You will not be able to participate in, or collect money damages from, any other lawsuit against Blue Sky or Sony Pictures or the Released Parties related to any alleged conspiracy to suppress compensation, including agreements to restrict recruiting or hiring or to coordinate compensation, including merit increase budgets and compensation ranges. (See Question 16 for the exact definition of the claims you are giving up.)

INFORMATION FOR LITIGATION CLASS MEMBERS

27. Am I a Litigation Class Member?

Animation or visual effects employees who held specific job titles at one or more of the Defendant companies during certain time periods may be Litigation Class Members if they meet the following class definition (the differences with Settlement Class Definition are in **bold** and underlined):

All animation and visual effects employees employed by one or more of the Defendants in the United States who held any of the job titles listed in the attached List of Job Titles by Defendant during the following time periods: Pixar (**2004-2010**), Lucasfilm Ltd., LLC (**2004-2010**), DreamWorks Animation SKG, Inc. (**2004-2010**), The Walt Disney Company (2004-2010), Sony Pictures Animation Inc. and Sony Pictures Imageworks Inc. (2004-2010), Blue Sky Studios, Inc. (2005-2010) and Two Pic MC LLC f/k/a ImageMovers Digital LLC (2007-2010). Excluded from the Class are senior executives, members of the board of directors, and persons employed to perform office operation or administrative tasks. (“Settlement Class”)

To be in the Litigation Class, you must have been an employee *and* held one or more of the job titles listed on the attached **List of Job Titles by Defendant** during the time periods above.

28. What is the difference between the Settlement Class and the Litigation Class?

The Litigation Class is smaller than the Settlement Class. It is a subset of the Settlement Class. The Litigation Class excludes employees who worked for a Defendant between 2001 and 2003 but did not work for a Defendant during the defined periods between 2004 and 2010. If you held a qualifying job title at either Pixar or Lucasfilm between 2001 and 2003 or at DreamWorks Animation in 2003 (and did not work for any of those three companies from 2004 to 2010), you *are* a Settlement Class Member, but you *are not* a Litigation Class Member.

It is possible that you are a Settlement Class Member, but not a Litigation Class Member. However, if you are a Litigation Class Member, you are certainly a Settlement Class Member.

29. What if I still don’t know if I’m a Litigation Class Member?

If you received this Notice, you may be a Litigation Class Member. If you are still not sure whether you are included, you can get help at www.animationlawsuit.com or by calling **855-730-8617**.

30. Does it make a difference whether I work or worked for Blue Sky or Sony Pictures, on the one hand, or DreamWorks Animation, Two Pic (f/k/a IMD), Lucasfilm, Pixar, or The Walt Disney Company, on the other hand?

As long as you fall within the definition of the Litigation Class in Question 27 above, you can participate in, or choose to exclude yourself from, the ongoing lawsuit against the Non-Settling Defendants, regardless of which Defendant you work or worked for, or whether you have worked for more than one. Current and former employees of Settling Defendants Blue Sky and Sony Pictures, and the Non-Settling Defendants (DreamWorks Animation, Two Pic/IMD, Lucasfilm, Pixar, Disney) who fall within the definition of the Litigation Class in Question 27 are all Litigation Class Members.

31. What are my rights as a Litigation Class Member?

If you are a Litigation Class Member, you have the right to (1) do nothing, in which case you will be bound by the outcome of the litigation against the Non-Settling Defendants, including receiving payment that could result from trial or future settlements in this litigation against Non-Settling Defendants, or (2) exclude yourself from the ongoing lawsuit, in which case you preserve any right you may have to bring a lawsuit of your own – but give up the right to receive any payment that could result from trial or future settlements in this litigation with Non-Settling Defendants (see Question 35).

THE LAWYERS REPRESENTING YOU AS A LITIGATION CLASS MEMBER

32. Who represents me as a Litigation Class Member in this case?

The Court appointed the following three law firms as Class Counsel to represent the Litigation Class:

<p>Daniel A. Small COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Ave. NW, Suite 500 Washington, DC 20005 animation@cohenmilstein.com 202-408-4600</p>	<p>Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 animation@hbsslaw.com 206-623-7292</p>	<p>Marc M. Seltzer SUSMAN GODFREY LLP 1901 Avenue of the Stars, Suite 950 Los Angeles, CA 90067-6029 mseltzer@susmangodfrey.com 310-789-3100</p>
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These lawyers and law firms are called “Plaintiffs’ Counsel.” They are the same lawyers who represent the Settlement Class.

33. Should I get my own lawyer?

You do not need to hire your own lawyer because the Plaintiffs' Counsel are working on your behalf. If you want your own lawyer, you may hire one, but you will be responsible for any payment for that lawyer's services. For example, you can ask your lawyer to appear in Court for you if you want someone other than Plaintiffs' Counsel to speak for you. You may also appear for yourself without a lawyer.

34. How will the lawyers be paid?

For the Litigation Class moving forward, if another settlement is reached with any or all of the Non-Settling Defendants, or if Plaintiffs are successful at trial against the Non-Settling Defendants, Plaintiffs' Counsel may ask the Court to approve a payment for attorney's fees, out-of-pocket costs and expenses, and Service Awards from any recovery as well.

The costs of providing this Notice and administering the Settlements are being paid from the Settlement Funds. If the Court grants Counsel's requests, all fees, costs, and expenses would be deducted from the Settlement Funds.

35. As a Litigation Class Member, how do I get out of the ongoing lawsuit?

If you fall within the Litigation Class definition but do not want to be included in the ongoing class action lawsuit against the Non-Settling Defendants then you must exclude yourself from or opt out of this lawsuit.

To exclude yourself from or opt out of the ongoing lawsuit against the Non-Settling Defendants, you must send a letter or other written request to the Notice and Claims Administrator saying that you want to be excluded from the Litigation Class in *In re: Animation Workers Antitrust Litigation*, with your full legal name and the name(s) of the Defendant company or companies for which you worked during the time frames specified above in Question 27. Your request must be postmarked no later than September 30, 2016 (or received by the Notice and Claims Administrator by that date if sent by fax or email). If you have any questions about how to submit this request, please call the Notice and Claims Administrator at the telephone number printed below.

If you request to be excluded from the ongoing lawsuit against the Non-Settling Defendants, you will not be legally bound by the Court's judgments. If the Litigation Class gets money or benefits as a result of any settlement or trial between any of the Non-Settling Defendants and the Plaintiffs, you will not receive any of that money or those benefits. You will, however, be able to sue, or continue to sue, any of the Non-Settling Defendants about the same legal claims that are involved in this case. If you do exclude yourself from the ongoing lawsuit and pursue a separate lawsuit, you will need to retain your own lawyer for that case or prosecute the case without a lawyer.

To exclude yourself from the ongoing lawsuit against the Non-Settling Defendants, you must submit an opt-out letter postmarked no later than **September 30, 2016** (or received by the Notice and Claims Administrator by that date if sent by fax or email) to the following address:

Animation Workers Antitrust Litigation
c/o Kurtzman Carson Consultants ("KCC")
P.O. Box 6002
Larkspur, CA 94977-6002
info@animationlawsuit.com
Fax: 415-256-9756

You cannot exclude yourself or opt out by telephone.

36. As a Litigation Class Member, if I don't exclude myself, can I sue the Non-Settling Defendants for the same thing separately by myself?

No. If you are a Litigation Class Member, unless you exclude yourself from the Litigation Class, you give up the right to sue in your own separate lawsuit the Non-Settling Defendants for the claims at issue in this lawsuit.

If you have a pending lawsuit against the Non-Settling Defendants, speak to your lawyer in that lawsuit immediately, because you may need to exclude yourself to continue your own lawsuit. The process for excluding yourself from the Litigation Class is described in Question 35.

37. As a Litigation Class Member, if I exclude myself, can I get money from the ongoing case against the Non-Settling Defendants?

If you exclude yourself from the continuing litigation, you will not be eligible to receive a share of the money recovered, if any, from Non-Settling Defendants in the future. However, by excluding yourself, you keep any rights to sue on your own about the same claims in the lawsuit should you want to do so, subject to any defenses the Defendants would have.

TRIAL

38. When will the trial occur to resolve the claims in the ongoing lawsuit?

If the case against the Non-Settling Defendants is not dismissed or settled, a trial is set to begin on June 12, 2017, in Courtroom 8 – 4th floor of the Robert F. Peckham Federal Building, 280 South 1st Street, San Jose, CA, 95113. This trial may be

moved to a different date or time without additional notice. The current schedule for the case will be posted at www.animationlawsuit.com.

39. Do I have to come to the trial?

You will not need to attend the trial unless you are a trial witness who volunteers or is asked to attend by one or more of the parties or by the Court. You and/or your own lawyer are welcome to attend. Check the website, www.animationlawsuit.com, to be kept informed of the trial schedule.

40. Will I get money after the trial?

There is no guarantee that Plaintiffs will obtain any money or benefits from the Non-Settling Defendants. Litigation Class Members will receive notice if Plaintiffs obtain money or benefits as a result of the trial or a settlement with one or more of the Non-Settling Defendants.

IF YOU DO NOTHING AS A LITIGATION CLASS MEMBER

41. As a Litigation Class Member, what happens if I do nothing at all?

If you are a Litigation Class Member and you do nothing, you will remain in the ongoing class action lawsuit and retain the ability to recover money or other benefits, if any, that may come from a trial or a settlement with the Non-Settling Defendants unless you separately request to exclude yourself (following the instructions in Question 35). By staying in the case, you give up your rights to sue any of the Non-Settling Defendants on your own about the same legal claims in this lawsuit and you will be bound by the results in the ongoing lawsuit.

ADDITIONAL INFORMATION FOR SETTLEMENT CLASS MEMBERS AND LITIGATION CLASS MEMBERS

YOUR PRIVACY

42. Will my manager know whether or how I responded to this Notice?

The Court has appointed an independent, experienced professional Notice and Claims Administrator, Kurtzman Carson Consultants (“KCC”). The Notice and Claims Administrator will establish and follow procedures to protect the confidentiality of the identity of persons receiving payments or opting out. The Notice and Claims Administrator will issue settlement checks. The list of those Settlement Class Members receiving checks will not be shared with Defendants, the Court, or Plaintiffs’ counsel.

The Notice and Claims Administrator will also receive requests to be excluded from the Settlements. The Notice and Claims Administrator will be required to share requests to be excluded from the Settlements with Class Counsel and counsel for the Defendants, as well as with the Court. Objections to the Settlements, as well as the names of those who opt out of the Settlements, will become part of the public record in the court file.

GETTING MORE INFORMATION

43. Are more details about the Settlements and the lawsuit available?

Yes. This notice summarizes the two proposed Settlements and the ongoing lawsuit against the Non-Settling Defendants. For the precise terms and conditions of the settlements, please see the settlement agreements available at www.animationlawsuit.com. For all of the documents filed with the Court in the lawsuit, you can also access the Court docket in this case through the Court’s Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>.

If you have additional questions, please contact the Notice and Claims Administrator:

Animation Workers Antitrust Litigation
 c/o Kurtzman Carson Consultants ("KCC")
 P.O. Box 40007
 College Station, TX 77842-4007
 info@animationlawsuit.com
 855-730-8617

You can also contact Class Counsel whose information is below again:

<p>Daniel A. Small COHEN MILSTEIN SELLERS & TOLL PLLC 1100 New York Ave. NW, Suite 500 Washington, DC 20005 animation@cohenmilstein.com 202-408-4600</p>	<p>Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 animation@hbsslaw.com 206-623-7292</p>	<p>Marc M. Seltzer SUSMAN GODFREY LLP 1901 Avenue of the Stars, Suite 950 Los Angeles, CA 90067-6029 mseltzer@susmangodfrey.com 310-789-3100</p>
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PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THESE SETTLEMENTS OR THE CLAIMS PROCESS.

EXHIBIT C

Animation Workers Antitrust Litigation

Requests for Exclusion

	FirstName	LastName
1	DARIN K	GRANT
2	WILLY	HWANG
3	HARLEY	JESSUP
4	KEVIN	OBRIEN