

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re BRF S.A. SECURITIES LITIGATION	: Civil Action No. 1:18-cv-02213-PKC
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	: <u>CLASS ACTION</u>
This Document Relates To:	:
	: SUPPLEMENTAL DECLARATION OF
ALL ACTIONS.	: ROSS D. MURRAY REGARDING NOTICE
	: DISSEMINATION AND REQUESTS FOR
	: EXCLUSION RECEIVED TO DATE
_____	X

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

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s May 15, 2020 Amended Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”) (ECF No. 160), Gilardi was appointed to supervise and administer the notice procedure as well as the processing of claims in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”).<sup>1</sup> I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (the “Initial Mailing Declaration”) (ECF No. 169). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and, if called to testify I could and would do so competently.

**UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE**

3. As more fully detailed in the Initial Mailing Declaration, as of September 17, 2020, Gilardi had mailed 61,517 copies of the Notice of Pendency and Proposed Settlement of Class Action (the “Notice”) and the Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

4. Since September 17, 2020, Gilardi has mailed an additional 4,992 copies of the Claim Package in response to additional requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of October 15, 2020, Gilardi has mailed a total of 66,509 Claim Packages to potential Class Members and nominees.

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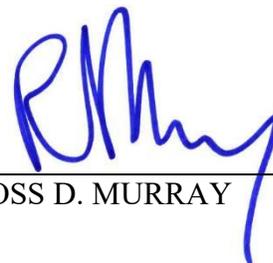
<sup>1</sup> All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated May 5, 2020 (ECF No. 157).

**REQUESTS FOR EXCLUSION RECEIVED TO DATE**

5. Pursuant to the Notice Order, the Notice informed potential Class Members that written requests for exclusion from the Class must be mailed to *BRF Securities Settlement, EXCLUSIONS*, c/o Gilardi & Co. LLC, 150 Royall Street, Suite 101, Canton, MA 02021, such that they were postmarked no later than October 2, 2020. As reported in the Initial Mailing Declaration, as of September 17, 2020, Gilardi had not received any requests for exclusion from the Class at this mailing address. See Initial Mailing Declaration, ¶16.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has not received any requests for exclusion.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 15th day of October, 2020, at San Rafael, California.



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ROSS D. MURRAY

**CERTIFICATE OF SERVICE**

I, David A. Rosenfeld, hereby certify that on October 16, 2020, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

s/ David A. Rosenfeld  
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DAVID A. ROSENFELD