

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE LITERARY WORKS IN ELECTRONIC DATABASES COPYRIGHT LITIGATION))))	MDL No. 1379
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**DECLARATION OF PERRY S. CARBONE ON BEHALF OF THE
GARDEN CITY GROUP, INC. REGARDING CERTAIN CLASS MEMBERS**

I, Perry S. Carbone, declare as follows:

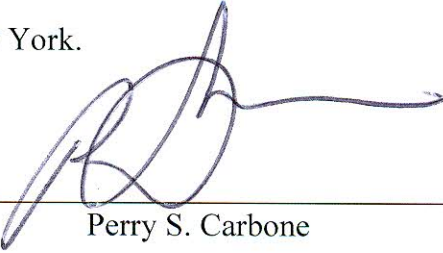
1. I am an Assistant Director of Operations for The Garden City Group, Inc. (“GCG”). Pursuant to the Court’s Order Granting Preliminary Approval Of Revised Proposed Class Action Settlement, dated January 22, 2014, GCG serves as the Claims Administrator in connection with the proposed Revised Settlement of the above-captioned action. The following statements are based on my personal knowledge, the business records of GCG, and information provided by other experienced GCG employees working under my supervision.

2. GCG mailed notice to Dennis McDougal at 3906 Olive Avenue, Long Beach, California 90807, on two occasions in connection with the original settlement in this case—once as part of the initial mailing of notice and again in response to a request for notice received through the settlement website. Neither notice was returned as undeliverable. For the initial mailing of notice, GCG had obtained names and addresses of potential class members from various sources. The address for Mr. McDougal was included in addresses supplied to GCG by The Authors Registry. For the revised settlement, GCG updated Mr. McDougal’s address using a National Change of Address search and mailed him notice at 640 Rocky Point Road, Cordova, Tennessee 38018.

3. GCG has no record of a settlement claim submitted by Christopher Petkanas.

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

Executed June 3, 2014, at Lake Success, New York.



Perry S. Carbone