

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

KIN-YIP CHUN, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

FLUOR CORPORATION, et al.,

Defendants.

Case No. 3:18-cv-01338-X

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA REGARDING:
(A) MAILING OF THE POSTCARD NOTICE; (B) REPORT ON EXCLUSION
REQUESTS AND OBJECTIONS; AND (C) CLAIMS RECEIVED TO DATE**

I, Luiggy Segura, declare as follows:

1. I am the Vice President of Securities Class Actions at JND Legal Administration (“JND”). Pursuant to ¶7 of the Court’s May 26, 2022 Order Preliminarily Approving Settlement and Providing for Notice (ECF 162) (the “Preliminary Approval Order”), JND was appointed to act as the Claims Administrator in connection with the above-captioned Action.¹ I submit this declaration as a supplement to my earlier declaration, the Declaration of Luiggy Segura Regarding: (A) Mailing of the Postcard Notice; (B) Publication of the Summary Notice; (C) Report on Exclusion Requests and Objections; and (D) Claims Received to Date, dated October 14, 2022, ECF No 167-2 (the “Initial Mailing Declaration”). The following statements are based on my personal knowledge and information provided to me by other experienced JND employees working under my supervision, and, if called as a witness, I could and would testify competently thereto.

¹ All capitalized terms are defined in the Stipulation of Settlement (ECF 159-1) (“Stipulation”), dated March 25, 2022, and the Preliminarily Approval Order, dated May 26, 2022.

NO FURTHER MAILING OF THE POSTCARD NOTICE

2. Since the execution of the Initial Mailing Declaration, JND has not received any additional requests from potential Settlement Class Members and their nominees for Postcard Notices nor have any additional Postcard Notices been mailed. Through October 26, 2022, and as previously reported in the Initial Mailing Declaration, JND has mailed a total of 405,813 Postcard Notices to potential Settlement Class Members and their nominees.²

UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE

3. JND continues to maintain the toll-free telephone number (1-888-964-2130) and Interactive Voice Recording (“IVR”) to accommodate potential Settlement Class Members. As of October 26, 2022, there have been a total of 1,567 calls to the toll-free telephone number. JND has promptly responded to each telephone inquiry and will continue to address potential Settlement Class Members’ inquiries.

4. JND also continues to maintain the website dedicated to the Settlement www.FluorSecuritiesSettlement.com (the “Settlement Website”) to assist potential Settlement Class Members. Through October 26, 2022, the Settlement Website has received 11,599 visits. The website will continue to be updated with relevant case information and court documents.

REPORT ON EXCLUSION REQUESTS AND OBJECTIONS

5. The Postcard Notice directed potential Settlement Class Members to the Long-Form Notice if they decided to submit a request for exclusion. The Long-Form Notice informs potential Settlement Class Members that requests for exclusion from the Settlement Class are to be addressed to Fluor Securities Settlement, c/o JND Legal Administration, P.O. Box 91325,

² This includes 1,064 Postcard Notices JND re-mailed to persons whose original mailings were returned by the U.S. Postal Service (“USPS”) as undeliverable and for whom updated addresses were provided to JND by the USPS and advanced address searches.

Seattle, WA 98111, such that they are received no later than October 17, 2022. Since the execution of the Initial Mailing Declaration and after the exclusion deadline of October 17, 2022, JND received one (1) additional request for exclusion, for a total of one (1) late request and four (4) timely requests received. Of these five (5) requests for exclusion from the Class, three (3), in consultation with Lead Counsel, were determined to be invalid, as they did not provide any transactional data during the Settlement Class Period. Attached hereto as Exhibit A is the additional exclusion request received on October 25, 2022.

6. The Long-Form Notice informs potential Settlement Class Members that all objections to the proposed Settlement must be received by the Court, Lead Counsel, and Defendants' counsel by October 17, 2022. While JND was not listed to be the recipient of objections, as of October 26, 2022, JND has not received and is not aware of any objections to the Settlement.


CLAIMS RECEIVED TO DATE

7. The Notices and Proof of Claim inform potential Settlement Class Members that claims must be received no later than October 14, 2022. As of October 26, 2022, JND has received approximately 200,990 claims and last received one on October 26, 2022. JND is currently in the process of reviewing, analyzing, and performing quality control on the claims received.

8. JND will provide the Court with the results of this administration, including total number of Proofs of Claim received and total recognized losses in connection with counsel's motion for distribution of the net settlement proceeds.

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

Executed on October 28, 2022, at New Hyde Park, New York.



Luiggy Segura

EXHIBIT A

OCT 14, 2022

Received
OCT 25 2022
by JNDLA

Hello Claims Administrator,

I'm requesting excision from the Settlement class in
Chun v. Fluor Corporation, Case no. 3:18-cv-01338-X.

Unfortunately, I do not keep my tax and financial
documents past 4 years back (to 2018) and
Charles Schwab, my broker, does not keep my
transaction history back before 2018. I have
no way to verify if I acquired Fluor stock
between your settlement's period of concern
8/14/2013 - 2/14/2020.

For your records, my legal name is [redacted] Hsu,
My address: [redacted] Pa [redacted], CA
91106. My phone: [redacted]

If you have questions, please do not hesitate
to reach out.

Thanks

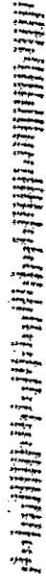
Allen Hsu



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FLOUR
SECURITIES SETTLEMENT
c/o JND LEGAL ADMINISTRATION
P.O. BOX 91325
SEATTLE, WA 98111

OCT 25 2022



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