



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

BRETT HAWKES,

Plaintiff,

v.

THE TORONTO-DOMINION BANK,
TD GROUP US HOLDINGS LLC, TD
BANK USA, NATIONAL
ASSOCIATION, TD BANK,
NATIONAL ASSOCIATION,
STEPHEN BOYLE, TIM HOCKEY,
BRIAN LEVITT, KAREN
MAIDMENT, BHARAT MASRANI,
IRENE MILLER, JOSEPH MOGLIA,
WILBUR PREZZANO, and THE
CHARLES SCHWAB
CORPORATION,

Defendants.

C.A. No. 2020-0360-PAF

**AFFIDAVIT OF LUIGGY SEGURA IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR CLASS DISTRIBUTION ORDER**

STATE OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

I, Luiggy Segura, being duly sworn, deposes and says:

1. I am the Vice President of Securities Class Actions at JND Legal Administration ("JND"). I am over 21 years of age and am not a party to the above-

captioned action (the “Action”).¹ I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. Pursuant to the Amended Scheduling Order (Trans. ID 67839482) entered by the Court in connection with the settlement of this Action (the “Settlement”), the Court authorized JND to act as the Settlement Administrator for the Settlement. As more fully described in the Affidavit of Lynn Alessandro Regarding (A) Mailing of the Original Notice and Amended Notice, (B) Publication of the Original Summary Notice and Amended Summary Notice, and (C) Establishment of Call Center and Settlement Website (Trans. ID 68103085), as the Settlement Administrator, JND has implemented the terms of the Settlement by, among other things: (i) mailing the Amended Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear (the “Notice”) to potential Class Members; (ii) causing the publication of the Amended Summary Notice of Pendency and Proposed Settlement of Stockholder Class Action, Settlement Hearing, and Right to Appear in *Investor’s Business Daily* and over *PR Newswire*; (iii) creating and continuing to maintain a toll-free helpline and a Settlement website to assist Class Members during the course of the

¹ Unless otherwise defined in this affidavit (the “Affidavit”), all capitalized terms that are not defined in this Affidavit have the meaning ascribed to them in the Stipulation and Agreement of Compromise, Settlement, and Release (the “Stipulation”) (Trans. ID 67428858).

administration; and (iv) administering the Settlement in accordance with the terms of the Stipulation.

3. Pursuant to the Court's Amended Order and Final Judgment (the "Final Approval Order") (Trans. ID 68138057), the Court granted final approval of the Settlement and the proposed plan of allocation of the Net Settlement Fund set forth in the Notice (the "Plan of Allocation"). I submit this Affidavit in support of Plaintiff's Motion for a Class Distribution Order, which will, among other things, approve the proposed plan for the distribution of the Net Settlement Fund to Eligible Closing Date Stockholders in accordance with the terms of the Settlement and the Court-approved Plan of Allocation.

MERGER RECORDS

4. Pursuant to the terms of the Court-approved Plan of Allocation, the Net Settlement Fund will be distributed to all Eligible Closing Date Stockholders, i.e., all Class Members who held shares of TD Ameritrade Holding Corporation ("Ameritrade") common stock at the Closing of the merger of Ameritrade and The Charles Schwab Corporation ("CSC") (the "Merger") and therefore were entitled to receive the Merger Consideration for their shares. In accordance with terms of the Stipulation, the Eligible Closing Date Stockholders do not include any of the Excluded Parties.

5. Under the terms of the Plan of the Allocation, Eligible Closing Date Stockholders were not required to file a claim form to receive distribution from the Settlement. Instead, distributions from the Net Settlement Fund will be paid to Eligible Closing Date Stockholders based upon the Merger Records provided to JND by CSC.

6. JND received a copy of the Merger Records identifying all registered holders of Ameritrade common stock who held shares of Ameritrade common stock at the Closing, i.e., October 6, 2020 (“Registered Holders”). The Merger Records contain the names, addresses, and number of shares held by each of the Registered Holders. The Merger Records identified 564 Registered Holders holding 234,054,642 shares of Ameritrade common stock outstanding at the Closing. Accounting for the 233,993,484 Excluded Shares described in paragraph 8 below, JND identified 61,158 shares of Ameritrade common stock held by Eligible Closing Date Stockholders at the Closing (the “Eligible Shares”).

7. JND also received a DTCC Allocation Report from Cede & Co. (“Cede”), as nominee for the Depository Trust & Clearing Company (“DTCC”), showing each DTCC Participant’s holdings of Ameritrade common stock at the Closing. JND also consulted with DTCC to confirm the accuracy of the number of shares identified in the Merger Records. The DTCC Allocation Report contains each DTCC Participant’s name, identification number, and the number of shares held by

the DTCC Participant. The DTCC Allocation Report identified 169 DTCC Participants holding a total of 434,452,640 Eligible Shares (the “Eligible Closing Date Beneficial Holders”). A total of 563 non-Cede individual record holders held the remaining 61,158 Eligible Shares of record (the “Eligible Closing Date Record Holders”).

8. Consistent with the terms of the Settlement, CSC provided JND with information concerning the stockholdings of the identified Excluded Parties. Based on the information provided by CSC, a total of 235,642,824 Excluded Shares has been identified as being held by 24 Excluded Parties, which includes 233,993,484 shares that were identified as being held by Ameritrade.

SETTLEMENT ADMINISTRATION FEES AND DISBURSEMENTS

9. JND agreed to be the Settlement Administrator in exchange for payment of its fees and expenses. Plaintiff’s Counsel received regular reports of all the work JND performed with respect to the administration of the Settlement and authorized the administration work performed herein. Attached hereto as Exhibit A are invoices of JND’s total fees and expenses for this matter through September 30, 2023, which total \$336,917.95. Further, JND’s estimate of fees and expenses to conduct the initial distribution of the Net Settlement Fund in accordance with the “Distribution Plan” described below are \$47,122.45. To date, JND has received \$289,802.14 for its fees and expenses. Accordingly, there is an outstanding balance

of \$94,328.26 payable to JND, which amount includes JND's anticipated fees and expenses for the initial distribution. Final Distribution amounts will be determined by the amount in the Net Settlement Fund at the time of distribution in accordance with the Distribution plan beginning on ¶ 10.

DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND

10. JND will distribute 100% of the Net Settlement Fund to Eligible Closing Date Stockholders, after deducting all payments previously allowed and the payments approved by the Court on this motion, and after deducting payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees (the "Distribution"), as follows:

- a. Consistent with ¶ 41 of the Court-approved Plan of Allocation, each Eligible Closing Date Stockholder will be allocated a *pro rata* payment from the Net Settlement Fund in connection with the Distribution equal to the product of (a) the number of shares held by the Eligible Closing Date Stockholder at the time such shares were converted into the right to receive the Merger Consideration in connection with the Closing of the Merger and (b) the "Per-Share Recovery" for the Settlement, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of shares held by all of the Eligible Closing Date Stockholders at the time such shares were converted into the right to receive the Merger Consideration in

connection with the Closing of the Merger. Based upon the total number of identified Eligible Shares and the estimated Net Settlement Fund available for distribution, the estimated Per-Share Recovery is \$0.057 per share.

b. Consistent with ¶ 17 of the Final Approval Order², with respect to Ameritrade common stock held of record at the Closing by DTCC, through its nominee Cede, JND will cause that portion of the Net Settlement Fund to be allocated to Eligible Closing Date Stockholders who held their shares through DTCC Participants to be paid directly to DTCC Participants. JND will then distribute that portion of the Net Settlement Fund among the DTCC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,³ using the same mechanism that DTCC used to distribute the Merger Consideration and subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. The DTCC Participants and their respective customers, including any intermediaries, will then ensure *pro rata* payment to

² See Final Approval Order ¶ 17 (JND will distribute the Settlement consideration, (“Notwithstanding ... any contrary language in the Plan of Allocation, ...in lieu of the Settlement consideration being distributed to the DTCC Participants by the Depository Trust Company...[JND] shall distribute the Settlement consideration directly to the DTCC Participants”).

³ For each DTCC Participant, the “Closing Security Position” is the number of shares of Ameritrade common stock reflected on the DTCC Allocation Report used by DTCC to distribute the Merger Consideration. See Notice at footnote 3.

each Eligible Closing Date Stockholder based on the number of Eligible Shares beneficially owned by such Eligible Closing Date Stockholder based on the number of shares beneficially owned by such Eligible Closing Date Stockholder at the time such shares were converted into the right to receive the Merger Consideration in connection with the Closing of the Merger.

c. Consistent with ¶ 43(ii) of the Plan of Allocation, with respect to Ameritrade common stock held of record as of the Closing other than by Cede, as nominee for DTCC (a “Closing Non-Cede Record Position”), JND will make payment from the Net Settlement Fund directly to the record owner of each such Closing Non-Cede Record Position (the “Eligible Closing Date Record Holders”) in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Closing Non-Cede Record Position.

d. For the avoidance of doubt, to the extent that any record owner, any DTCC Participants, or their respective customers, including any intermediaries, took or permitted actions that had the effect of increasing the number of shares of Ameritrade common stock entitled to payment of the Merger Consideration, whether through permitting naked short-selling or the cash settlement of short positions or through any other means (“Increased Merger Consideration Entitlements”), such record owner, DTCC

Participants, or their respective customers (including intermediaries) will be responsible for paying to the ultimate beneficial owners of such Increased Merger Consideration Entitlements an amount equal to the Per-Share Recovery times the number of the Increased Merger Consideration Entitlements. Whether DTCC, any DTCC Participant, or DTCC Participants' customers are entitled to receive such funds from any such short-seller is not before this Court.

e. Consistent with ¶ 43(iii) of the Plan of Allocation, for the avoidance of doubt, any person who purchased shares of Ameritrade common stock during the Class Period but had not settled those shares at the Merger's Closing ("Non-Settled Shares") will be treated as an Eligible Closing Date Stockholder (and their shares treated as Eligible Shares) with respect to those Non-Settled Shares (except for the Excluded Shares), and any person who sold those Non-Settled Shares on or before the Closing on October 6, 2020, will not be treated as an Eligible Closing Date Stockholder with respect to those Non-Settled Shares.

f. Following the distribution of the Net Settlement Fund to DTCC Participants, inquiries by Eligible Closing Date Stockholders regarding payment of the Net Settlement Fund should be made directly to DTCC

Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares.

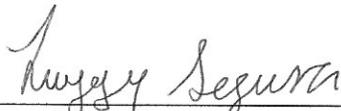
g. In order to encourage Eligible Closing Date Stockholders to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all Distribution checks will bear a notation “CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE].”

h. All undeliverable or uncashed payments returned to JND by DTCC Participants or the holder of a Closing Non-Cede Record Position shall be available for further distribution provided that such distribution is economically feasible. At such time as Lead Counsel, in consultation with JND, determines that further distribution of the funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance of the Net Settlement Fund, after payment of any unpaid fees or expenses incurred in connection with administering the Net Settlement Fund and after the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be contributed to the Combined Campaign for Justice (the “CCJ”).

i. Paper copies of all supporting documentation may be destroyed one year after the distribution of the Net Settlement Fund, and electronic

copies of the same may be destroyed one year after all funds in the Net Settlement Fund have been distributed.

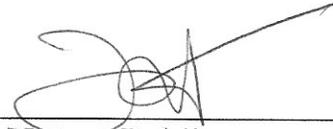
I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed this 23rd day of October 2023.



Luiggy Segura

Sworn to and subscribed before me this 23rd day of October 2023.

ZHI HENG CHIU
NOTARY PUBLIC, STATE OF NEW YORK
Registration Number 01CH6430160
Qualified in Nassau County
My Commission Expires March 14, 2026



Notary Public
State of New York, __ County of NASSAU

My Commission Expires: MARCH 14, 2026

Personally Known or Produced Identification.

Type of Identification Produced: NYS DRIVER LICENSE

EXHIBIT A
INVOICES



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1100 2nd Ave., Suite #300
Seattle, WA 98101
206.788.8750
accounting@classactionadmin.com
www.jndla.com

PAID
09/29/2022

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
6/23/2022	144351

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (Inception - May 31, 2022)		
	Fees:		
80,000	Notice Packet Printing	0.49	39,200.00
7.5	Call Center	115.00	862.50
66.12	IVR Minutes	0.32	21.16
1	TFN Monthly Maintenance	50.00	50.00
28	Case Website	160.00	4,480.00
1	Monthly Website Maintenance	200.00	200.00
2.25	Database Management	160.00	360.00
5	Quality Assurance	185.00	925.00
6.75	Email Communications	115.00	776.25
41.75	Working with Brokers	125.00	5,218.75
45	Project Management	170.00	7,650.00
10	Publish Notice	260.00	2,600.00
7.25	Mailroom	105.00	761.25
	Expenses:		
	Investor's Business Daily	4,700.00	4,700.00
	PR Newswire	3,755.00	3,755.00
31,641	Electronic Data Storage	0.006	189.85
	Broker Reimbursement	2,191.29	2,191.29
2	PO Box	150.00	300.00
	Postage	5,372.69	5,372.69
	Domain Registration	627.65	627.65
		Invoice Total	\$80,241.39



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

PAID
09/29/2022

Invoice

DATE	INVOICE #
7/22/2022	144547

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June1 - 30, 2022)		
	Fees:		
150,000	Notice Packet Printing	0.47	70,500.00
1	Research Undeliverables / Remail	95.00	95.00
7.25	Track Undeliverables / Process Forwards	105.00	761.25
26.25	Call Center	100.00	2,625.00
1,388.47	IVR Minutes	0.32	444.31
1	TFN Monthly Maintenance	50.00	50.00
2	Case Website	150.00	300.00
1	Monthly Website Maintenance	200.00	200.00
18.5	Project Management	200.00	3,700.00
9	Mailroom	100.00	900.00
0.5	Draft/Format/Quality Review Notices and Other	95.00	47.50
	Documents		
0.25	Process Broker Reimbursement Requests	95.00	23.75
36.25	Process Broker Shareholder Lists	115.00	4,168.75
	Expenses:		
78,088	Electronic Data Storage	0.006	468.53
	Broker Reimbursement	85,774.68	85,774.68
1	PO Box	150.00	150.00
	Postage	28,363.08	28,363.08
	Supplies	94.57	94.57
	Address Searches	7.04	7.04
	Copy Charges	170.80	170.80

Invoice Total



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1100 2nd Ave., Suite 300
Seattle, WA 98101
206.788.8750
accounting@classactionadmin.com
www.jndla.com

PAID
09/29/2022

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
7/22/2022	144547

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	FedEx	717.45	717.45
	Translation	12.75	12.75

Invoice Total \$199,574.46



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
1100 2nd Ave., Suite 300
Seattle, WA 98101
206.788.8750
accounting@classactionadmin.com
www.jndla.com

PAID
09/29/2022

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
8/30/2022	144999

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2022)		
	Fees:		
5.75	Track Undeliverables / Process Forwards	105.00	603.75
270.92	IVR Minutes	0.32	86.69
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
6.5	Project Management	210.00	1,365.00
2.75	Mailroom	65.00	178.75
9.25	Class Member Communications	120.00	1,110.00
1	Process Broker Reimbursement Requests	95.00	95.00
	Expenses:		
78,201	Electronic Data Storage	0.006	469.21
	Broker Reimbursement	5,538.41	5,538.41
	PO Box	150.00	150.00
	Supplies	1.56	1.56
	Address Searches	136.32	136.32
	Copy Charges	1.60	1.60

Invoice Total	\$9,986.29
----------------------	-------------------

--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine Van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
9/30/2022	145213

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

Date	HOURS	DESCRIPTION	RATE	AMOUNT
		Billing Period (August 1 - 31, 2022)		
		Fees:		
	11.25	Contact Center Services	70.00	787.50
	244.32	IVR Minutes	0.32	78.18
	1	TFN Monthly Maintenance	50.00	50.00
	1	Monthly Website Maintenance	200.00	200.00
	3.25	Project Management	195.00	633.75
	1.25	Mailroom	60.00	75.00
	1	Quality Assurance	200.00	200.00
		Expenses:		
	78,261	Electronic Data Storage	0.006	469.57
	1	PO Box	165.00	165.00
		Copy Charges	13.80	13.80

Invoice Total	\$2,672.80
----------------------	-------------------



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
11/7/2022	145459

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2022)		
	Fees:		
4.5	Contact Center Services	70.00	315.00
366.53	IVR Minutes	0.32	117.29
1	TFN Monthly Maintenance	50.00	50.00
1.75	Website Updates	150.00	262.50
1	Monthly Website Maintenance	200.00	200.00
14.5	Project Management	170.00	2,465.00
2.25	Process Broker Shareholder Lists	95.00	213.75
0.25	Mailroom	70.00	17.50
	Expenses:		
78,294	Electronic Data Storage	0.006	469.76
1	PO Box	165.00	165.00
	Copy Charges	2.40	2.40

Invoice Total		\$4,278.20
----------------------	--	------------

--	--	--



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1100 2nd Ave., Suite 300
Seattle, WA 98101
206.788.8750
accounting@classactionadmin.com
www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
12/13/2022	145136

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (October 1 - 31, 2022)		
	Fees:		
6.75	Contact Center Services	70.00	472.50
233.7	IVR Minutes	0.32	74.78
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
18.75	Project Management	170.00	3,187.50
	Expenses:		
78,300	Electronic Data Storage	0.006	469.80
1	PO Box	165.00	165.00

Invoice Total	\$4,619.58
----------------------	------------

--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine Van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
12/30/2022	147057

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (November 1 - 30, 2022)		
	Fees:		
121.42	IVR Minutes	0.32	38.85
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
16	Project Management	170.00	2,720.00
6.75	Class Member Communications	95.00	641.25
	Expenses:		
78,302	Electronic Data Storage	0.006	469.81
1	PO Box	165.00	165.00

Invoice Total	\$4,284.91
----------------------	-------------------

--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite #300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine Van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
1/31/2023	148253

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (December 1 - 31, 2022)		
	Fees:		
149.14	IVR Minutes	0.32	47.72
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
3.75	Project Management	160.00	600.00
3	Call Center	65.00	195.00
6.25	Email Communications	100.00	625.00
0.5	Process Broker Shareholder Lists	135.00	67.50
	Expenses:		
78,304	Electronic Data Storage	0.006	469.82
1	PO Box	165.00	165.00

		Invoice Total	\$2,420.04
--	--	----------------------	------------

--	--	--	--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

DATE	INVOICE #
2/21/2023	148454

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (January 1 - 31, 2023)		
	Fees:		
111.02	IVR Minutes	0.32	35.53
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
5.5	Project Management	160.00	880.00
4	Email Communications	100.00	400.00
	Expenses:		
78,307	Electronic Data Storage	0.006	469.84
1	PO Box	165.00	165.00

			Invoice Total \$2,200.37
--	--	--	---------------------------------

--	--	--	--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite #300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

DATE	INVOICE #
3/21/2023	148620

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine Van Kampen 1251 Avenue of the Americas New York, NY 10020

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (February 1 - 28, 2023)		
	Fees:		
86.22	IVR Minutes	0.32	27.59
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
3.75	Project Management	160.00	600.00
2.25	Call Center	65.00	146.25
	Expenses:		
78,306	Electronic Data Storage	0.006	469.84
1	PO Box	165.00	165.00

		Invoice Total	\$1,658.68
--	--	----------------------	------------

--	--	--	--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
4/27/2023	149031

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (March 1 - 31, 2023)		
	Fees:		
71.41	IVR Minutes	0.32	22.85
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
5	Project Management	195.00	975.00
2.25	Call Center	65.00	146.25
	Expenses:		
78,310	Electronic Data Storage	0.006	469.86
1	PO Box	165.00	165.00

Invoice Total	\$2,028.96
----------------------	------------

--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Andrew Ditchfield Davis Polk & Wardwell LLP 450 Lexington Ave New York, NY 10017

DATE	INVOICE #
5/30/2023	149218

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (April 1 - 30, 2023)		
	Fees:		
54.65	IVR Minutes	0.32	17.49
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
7.75	Project Management	160.00	1,240.00
2	Call Center	65.00	130.00
	Expenses:		
78,310	Electronic Data Storage	0.006	469.86
1	PO Box	165.00	165.00

Invoice Total	\$2,272.35
----------------------	-------------------

--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
6/27/2023	149463

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (May 1 - 31, 2023)		
	Fees:		
33.53	IVR Minutes	0.32	10.73
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
4.25	Project Management	160.00	680.00
1.25	Call Center	65.00	81.25
	Expenses:		
78,310	Electronic Data Storage	0.006	469.86
1	PO Box	165.00	165.00

Invoice Total	\$1,656.84
----------------------	-------------------

--



CLASS ACTION
ADMINISTRATION

Class Action Administration LLC
1100 2nd Ave., Suite #300
Seattle, WA 98101
206.788.8750
accounting@classactionadmin.com
www.jndla.com

Invoice

DATE	INVOICE #
7/31/2023	149707

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (June 1 - 30, 2023)		
	Fees:		
82.25	IVR Minutes	0.32	26.32
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
2.75	Project Management	160.00	440.00
2.5	Call Center	65.00	162.50
	Expenses:		
78,314	Electronic Data Storage	0.006	469.88
1	PO Box	165.00	165.00
		Invoice Total	\$1,513.70



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite #300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

DATE	INVOICE #
8/22/2023	149856

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (July 1 - 31, 2023)		
	Fees:		
34.51	IVR Minutes	0.32	11.04
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
14.5	Project Management	160.00	2,320.00
	Expenses:		
78,314	Electronic Data Storage	0.006	469.88
1	PO Box	165.00	165.00
		Invoice Total	\$3,215.92



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
9/21/2023	170018

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (August 1 - 31, 2023)		
	Fees:		
115.95	IVR Minutes	0.32	37.10
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
39.25	Project Management	160.00	6,280.00
2.5	Call Center	65.00	162.50
	Expenses:		
78,318	Electronic Data Storage	0.006	469.91
1	PO Box	165.00	165.00

Invoice Total	\$7,364.51
----------------------	-------------------

--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
10/12/2023	170235

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Billing Period (September 1 - 30, 2023)		
	Fees:		
68.02	IVR Minutes	0.32	21.77
1	TFN Monthly Maintenance	50.00	50.00
1	Monthly Website Maintenance	200.00	200.00
35.5	Project Management	160.00	5,680.00
5.25	Call Center	65.00	341.25
	Expenses:		
78,488	Electronic Data Storage	0.006	470.93
1	PO Box	165.00	165.00

Invoice Total	\$6,928.95
----------------------	-------------------

--



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

DATE	INVOICE #
8/29/2023	149951

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
	Distribution Estimate (9 Months)		
	Fees:		
230	Check Printing, including reissues	0.36	82.80
50	Wire Process	150.00	7,500.00
100	Project Manager working with Financial Institutions and Brokers	125.00	12,500.00
10	Uncashed Check Outreach	95.00	950.00
9	Bank Account Reconciliation (Positive Pay Uploads & Check Exception Review)	150.00	1,350.00
20	Call Center	65.00	1,300.00
1,500	IVR Minutes	0.32	480.00
9	TFN Monthly Maintenance	50.00	450.00
	Case Website	0.00	0.00
9	Monthly Website Maintenance	200.00	1,800.00
50	Coordinate Distribution/Project Management/Audit Review	170.00	8,500.00
10	Class Member and Broker Communications	95.00	950.00
1	OFAC	5,000.00	5,000.00
	Expenses:		
702,558	Electronic Data Storage	0.006	4,215.35
9	PO Box	165.00	1,485.00
	Copy Charges	25.00	25.00
	FedEx	75.00	75.00

			Invoice Total
--	--	--	----------------------



**CLASS ACTION
ADMINISTRATION**

Class Action Administration LLC
 1100 2nd Ave., Suite 300
 Seattle, WA 98101
 206.788.8750
 accounting@classactionadmin.com
 www.jndla.com

Invoice

DATE	INVOICE #
8/29/2023	149951

BILL TO
Bernstein Litowitz Berger & Grossmann LLP c/o Catherine van Kampen 1251 Avenue of the Americas New York, NY 10020

PROJECT	TERMS
TDA - Ameritrade Merger Litigation	Settlement Fund

HOURS / QTY	DESCRIPTION	RATE	AMOUNT
63	Supplies	150.00	150.00
	Box Storage	2.50	157.50
	Postage	151.80	151.80

			Invoice Total \$47,122.45
--	--	--	----------------------------------

--	--	--	--