

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LORD ABBETT AFFILIATED FUND, INC.,  
*et al.*, Individually and on Behalf of All Others  
Similarly Situated,

*Plaintiffs,*

v.

NAVIENT CORPORATION, *et al.*,

*Defendants.*

C.A. No. 16-112-MN

Judge Maryellen Noreika

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA REGARDING  
MAILING OF THE NOTICE AND CLAIM FORM**

I, Luiggy Segura, hereby declare under penalty of perjury as follows:

1. I am the Senior Director of Securities Class Actions at JND Legal Administration (“JND”). Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice, dated November 22, 2021 (D.I. 341) (the “Preliminary Approval Order”), Lead Counsel was authorized to retain JND as the Claims Administrator in connection with the Settlement of the above-captioned action (the “Action”).<sup>1</sup> I submit this Declaration as a supplement to my earlier declaration, the Declaration of Luiggy Segura Regarding: (A) Mailing of the Settlement Notice and Claim Form; and (B) Publication of the Summary Notice, dated February 9, 2022 (D.I. 347-3) (the “Initial Mailing Declaration”). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.

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<sup>1</sup> All capitalized terms used in this declaration that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated November 16, 2021 (D.I. 339-1).

**CONTINUED MAILING OF THE SETTLEMENT NOTICE PACKET**

2. Since the execution of my Initial Mailing Declaration, JND has continued to disseminate copies of the Settlement Notice and Claim Form (together, the “Notice Packet”) in response to additional request from potential Class Members and nominees. As of March 9, 2022, JND has mailed a total of 106,516 Settlement Notice Packets to potential Class Members and nominees.

**TELEPHONE HELPLINE AND WEBSITE**

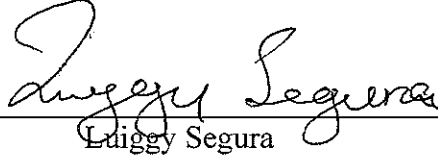
3. JND continues to maintain the toll-free telephone helpline, 1-833-358-1847, and interactive voice response system to accommodate inquiries from Class Members. JND also continues to maintain the dedicated website for the Action, [www.NavientSecuritiesLitigation.com](http://www.NavientSecuritiesLitigation.com), to assist potential Class Members. On February 11, 2022, JND posted to the case website copies of the papers filed in support of Lead Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation and Lead Counsel’s Motion for an Award of Attorneys’ Fees and Litigation Expenses. JND will continue to maintain and, as appropriate, update the case website and toll-free telephone helpline until the conclusion of this administration.

**INTERIM REPORT ON CLAIMS RECEIVED TO DATE**

4. The Settlement Notice also informed potential members of the Class that if they wished to be eligible for a payment from the Settlement they must submit a Claim Form to JND, with supporting documentation, postmarked or submitted online no later than April 13, 2022. In JND’s experience, the large majority of claimants submit their claims close to the deadline. As of March 9, 2022, JND has received 1,900 claims by mail or electronically.

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

Executed on March 10, 2022.

  
Luiggy Segura