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People. Power. Performance.™

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Corporate Resume

BACKGROUND

The recognized leader in legal administration services for class action settlements of all types (including but not limited to Securities, SEC Disgorgements, Antitrust, Consumer & Product, Labor & Employment, ERISA, Civil & Human Rights, Insurance & Healthcare, and Mass Tort).

- ◆ 9 strategically located offices across the U.S.
- ◆ Over 400 employees.
- ◆ More than 30 on-staff attorneys with extensive experience and backgrounds including ClassAction Litigation, Securities, and Bankruptcy.
- ◆ A full-service, in-house advertising agency led by renowned notice expert.
- ◆ State-of-the-art, 24/7 call center providing toll-free access worldwide.

INDUSTRY EXPERIENCE

- ◆ Administered over one thousand cases during its existence.
- ◆ Mailed over 260 million notices.
- ◆ Processed tens of millions of claims.
- ◆ Distributed over \$25 billion in compensation.
- ◆ Issued over 24 million checks.
- ◆ Handled over 3 million calls.
- ◆ Designed and launched hundreds of case websites.
- ◆ Pioneered institutional and web-based electronic claim filing.
- ◆ Exhibit A contains a complete listing of major class actions by settlement value, notices mailed, and claim volume.



SECURITIES RELATED EXPERIENCE

GCG has handled a significant proportion of the largest and most complex securities class action settlements of all time.

- ◆ Handled 5 of the top 10 largest Securities Settlements of all time.
- ◆ Administered 32 of the 100 largest Securities Settlements to date (more than any other settlement administrator).
- ◆ Pioneer of electronic institutional filing including GCG's recent launch of its institutional filing website GCG ICE.™



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INTERNATIONAL EXPERIENCE

GCG has handled complex administrations with cross-border and/or international reach. GCG has experience and resources to adapt to any international component.

- ◆ Published notice in over 70 languages across more than 170 different countries in one case alone.
- ◆ Processed claims from hundreds of countries in multiple currencies.
- ◆ Largest global Nominee database with institutional contacts around the world.
- ◆ Distributed funds in hundreds of countries in over 50 currencies.
- ◆ Distributed funds to hundreds of thousands of European claimants via electronic transfer.

QUALITY

All GCG processes have continuous and rigorous control processes from:

- ◆ Claim packet dissemination.
- ◆ Claim intake and auto-scanning.
- ◆ Claim entry and document review.
- ◆ Award calculation.
- ◆ Check distribution.

GCG has a company-wide Audit and Compliance Department as well as an internal quality control staff at the case level. The following are results from independent audits:

- ◆ WorldCom – 99.97% accuracy rate
 - ◆ Nearly 1 million claims
 - ◆ 42 different securities
- ◆ Global Crossing – 99.99% accuracy rate
 - ◆ Over 300 thousand claims
 - ◆ 14 different securities
- ◆ McAfee (SEC) – 99.97% accuracy rate
 - ◆ Over 30 thousand claims
 - ◆ \$67 million settlement fund



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EXPERIENCE IN MAJOR CLASS ACTIONS BY SETTLEMENT VALUE

- ◆ WorldCom Securities Litigation – \$6.2 billion
- ◆ Tyco Securities Litigation – \$3.2 billion
- ◆ Visa Check/Mastermoney Antitrust Litigation – \$3.05 billion
- ◆ Nortel Networks Securities Litigation – \$2.2 billion
- ◆ Claims Resolution Tribunal (Swiss Bank) – \$1.25 billion
- ◆ Royal Ahold Securities Litigation – \$1.1 billion
- ◆ Exxon Dealer Litigation – \$1.075 billion
- ◆ Engle Trust Fund – \$800 million
- ◆ Bristol Myers Securities Litigation – \$750 million
- ◆ Lucent Technologies Inc. Securities Litigation -- \$667 million
- ◆ IPO Securities Litigation -- \$586 million
- ◆ Auction Houses Antitrust Litigation – \$512 million
- ◆ Global Crossing Securities Litigation – \$447 million
- ◆ Freddie Mac Securities Litigation – \$410 million
- ◆ Western Union – Mexico Money Transfer Litigation – \$380 million
- ◆ Hillenbrand Antitrust Litigation – \$337.5 million
- ◆ Delphi Corporation Securities Litigation – \$333 million
- ◆ Williams Securities Litigation – \$311 million
- ◆ Daimler/Chrysler AG Securities Litigation – \$300 million
- ◆ Indirect Vitamin Products Antitrust Settlement – \$225 million
- ◆ Tenet Healthcare Securities Litigation – \$216.5 million
- ◆ Sears Securities Litigation – \$215 million
- ◆ Tobacco Growers Antitrust Litigation – \$200 million
- ◆ CMS Energy Securities Litigation – \$200 million
- ◆ Lease Oil Antitrust Litigation – \$194 million
- ◆ Bristol Myers Squibb Securities Litigation – \$180 million
- ◆ Dollar General Securities Litigation – \$172 million
- ◆ First Colony Life Insurance Company – \$165 million
- ◆ In re Buspirone Litigation – \$145 million
- ◆ In re Deutsch Telecom AG Securities Litigation – \$120 million
- ◆ Philip Morris Securities Litigation – \$115 million
- ◆ StarLink Corn Products Litigation – \$110 million
- ◆ CVS Corporation Securities Litigation – \$110 million
- ◆ Lee v. Allstate – \$101 million



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EXPERIENCE IN MAJOR CLASS ACTIONS BY NOTICES MAILED

- ◆ Visa Check/Mastermoney Antitrust Litigation – 26,000,000 notices
- ◆ IPO Securities Litigation – 25,000,000 notices
- ◆ Cruz v. Western Union Money Transfer Litigation – 18,000,000 notices
- ◆ Sears Roebuck & Co. and Sears National Bank – 11,000,000 notices
- ◆ Pelayo v. Mexico Money Transfer Litigation – 9,000,000 notices
- ◆ Moneygram – Mexico Money Transfer Litigation – 5,000,000 notices
- ◆ Progressive Group Auto Insurance Litigation – 4,500,000 notices
- ◆ WorldCom Securities Litigation – 4,000,000 notices
- ◆ Global Crossing Securities Litigation – 3,800,000 notices
- ◆ Lucent Technologies Inc. Securities Litigation – 3,500,000 notices
- ◆ Amorsolo v. Western Union Litigation – 3,500,000 notices
- ◆ Total Loss Insurance Litigation – 3,000,000 notices
- ◆ DSL Services Litigation – 3,000,000 notices
- ◆ Oxmoor House Settlement – 3,000,000 notices
- ◆ GM Brake Litigation – 2,500,000 notices
- ◆ Nortel Networks Securities Litigation – 2,480,000 notices
- ◆ Tyco Securities Litigation – 2,450,000 notices
- ◆ America On-line Cancellation Settlement – 2,300,000 notices
- ◆ Paterson v. Western Union Litigation – 2,000,000 notices
- ◆ St. Paul Travelers Securities Litigation II – 2,000,000 notices
- ◆ Bristol Myers Squibb Securities Litigation – 1,950,000 notices
- ◆ Bristol Myers Securities Litigation – 1,800,000 notices
- ◆ Johnson & Johnson Contact Lens Litigation – 1,500,000 notices
- ◆ Title Insurance Litigation – 1,400,000 notices
- ◆ Compaq Securities Litigation – 1,000,000 notices
- ◆ Dollar General Securities Litigation – 1,000,000 notices
- ◆ Philip Morris Securities Litigation – 1,000,000 notices
- ◆ Procter & Gamble Securities Litigation – 1,000,000 notices



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EXPERIENCE IN MAJOR CLASS ACTIONS BY CLAIM VOLUME

- ◆ American Express Financial Advisors Securities Litigation – 1,000,000 claims
- ◆ Daniels v. Allstate – 995,000 claims
- ◆ WorldCom Securities Litigation – 980,000 claims
- ◆ Progressive Fair Credit Reporting Act Settlement – 815,000 claims
- ◆ Visa Check/Mastermoney Antitrust Litigation – 815,000 claims
- ◆ Lucent Technologies, Inc. Securities Litigation – 700,000 claims
- ◆ Deloris Kline v. Progressive Corporation – 685,000 claims
- ◆ Global Crossing Securities Litigation – 600,000 claims
- ◆ Nortel Networks (I & II) Securities Litigation – 500,000 claims
- ◆ Tyco Securities Litigation – 480,000 claims
- ◆ Time Warner Entertainment Company Litigation – 480,000 claims
- ◆ Bristol Myers Securities Litigation – 425,000 claims
- ◆ Dip Tube Settlement – 365,000 claims
- ◆ FTC v. Consumer Info.com – 340,000 claims
- ◆ Royal Ahold Securities Litigation – 275,000 claims
- ◆ Bristol Myers Squibb Securities Litigation – 250,000 claims
- ◆ Philip Morris Securities Litigation – 250,000 claims
- ◆ Procter & Gamble Securities Litigation – 250,000 claims
- ◆ GM Brake Litigation – 250,000 claims
- ◆ Southwest Bell Zamora – 250,000 claims
- ◆ St. Paul Travelers Securities Litigation II – 240,000 claims
- ◆ DSL Services Litigation – 230,000 claims
- ◆ Ameritech Mobile Communications Settlement – 200,000 claims
- ◆ Tobacco Growers Antitrust Litigation – 200,000 claims
- ◆ Freddie Mac Securities Litigation – 185,000 claims
- ◆ St. Paul Securities Litigation – 160,000 claims
- ◆ Compaq Securities Litigation – 150,000 claims
- ◆ Dynegy/Enron Shareholders Litigation – 150,000 claims
- ◆ International Auction Houses Antitrust Litigation – 150,000 claims
- ◆ Johnson & Johnson Contact Lens Litigation – 150,000 claims
- ◆ Sears Securities Litigation – 145,000 claims
- ◆ Daimler-Chrysler AG Securities Litigation – 115,000 claims
- ◆ Bell South Securities Litigation – 107,000 claims
- ◆ Title Insurance Litigation – 100,000 claims
- ◆ Total Loss Insurance Settlement – 100,000 claims