

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

In re UNITI GROUP INC. SECURITIES LITIGATION	)	Master File No. 4:19-cv-00756-BSM
	)	<u>CLASS ACTION</u>
	)	
_____	)	
This Document Relates To:	)	
ALL ACTIONS.	)	
	)	
_____	)	

**SUPPLEMENTAL DECLARATION OF LANCE CAVALLO  
REGARDING (A) UPDATE ON MAILING OF THE NOTICE PACKET;  
(B) UPDATE ON TELEPHONE HOTLINE AND SETTLEMENT WEBSITE;  
AND (C) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, Lance Cavallo, declare and state as follows:

1. I am a Vice President of Class Actions at Kurtzman Carson Consultants LLC (“KCC”). Pursuant to the Court’s July 20, 2022 Order Granting Preliminary Approval of Class Action Settlement (“Preliminary Approval Order”) (ECF 128), the Court approved the retention of KCC as Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the “Action”).<sup>1</sup> I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

**UPDATE ON MAILING OF THE NOTICE PACKET**

2. As set forth in the Initial Mailing Declaration, KCC had mailed 356,402 Notice Packets to potential Settlement Class Members and nominees as of September 28, 2022. Since the execution of the Initial Mailing Declaration, KCC has continued to receive requests from potential

<sup>1</sup> All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated June 17, 2022 (the “Settlement Agreement”) (ECF 124) and/or the Declaration of Lance Cavallo Regarding (A) Mailing of Notice and Claim Form; (B) Publication of Summary Notice; (C) Establishment of the Telephone Hotline; (D) Establishment of the Settlement Website; and (E) Report on Requests for Exclusion Received to Date (the “Initial Mailing Declaration”) (ECF 135-4).

Settlement Class Members and nominees for copies of the Notice Packet. As a result, an additional 450 Notice Packets have been mailed such that as of October 26, 2022, KCC has mailed a total of 356,852 Notice Packets to potential Settlement Class Members or their nominees.

**UPDATE ON TELEPHONE HOTLINE AND SETTLEMENT WEBSITE**

3. The Initial Mailing Declaration noted that KCC maintains a toll-free telephone number (1-844-594-2510) for Settlement Class Members to call and obtain information about the Settlement as well as request a Notice Packet. KCC has promptly responded to each telephone inquiry and will continue to respond to Settlement Class Member inquiries via the toll-free telephone number.

4. The Initial Mailing Declaration also noted that KCC maintains a website dedicated to the Settlement ([www.UnityGroupSecuritiesLitigation.com](http://www.UnityGroupSecuritiesLitigation.com)). On September 30, 2022, KCC posted to the Settlement Website copies of the papers filed in support of Plaintiffs' Motion for Final Approval of Settlement and Approval of Plan of Allocation and Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4). KCC will continue to maintain and, as appropriate, update the Settlement Website until the conclusion of the administration.

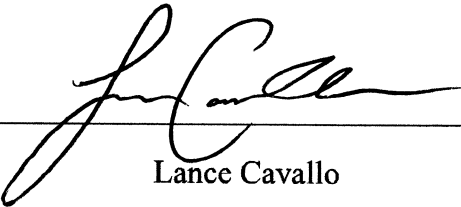
**REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

5. The Notice, Summary Notice, and Settlement Website informed potential Settlement Class Members that requests for exclusion from the Settlement Class must be addressed to *Unity Group Inc. Securities Litigation*, c/o KCC LLC, EXCLUSIONS, P.O. Box 5100, Larkspur, CA, 94977-5100, such that they were received no later than October 14, 2022. As reported in the Initial Mailing Declaration, KCC received six (6) requests for exclusion from the Settlement Class as of September 28, 2022. Since that date, KCC has received eleven (11) additional requests which

are attached hereto as Exhibit A.<sup>2</sup> In total, as of October 26, 2022, KCC has received seventeen (17) requests for exclusion from the Settlement Class.

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

Executed in Wantagh, New York on October 27, 2022.



Lance Cavallo

---

<sup>2</sup> Portions of Exhibit A have been redacted to protect confidential personally identifiable information.

# Exhibit A

RECEIVED  
October 3, 2022  
Claims Center

## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Ernestine G Turner Trust,  
Joseph C Robinson Trustee

Request Number: 0007

[REDACTED]  
South Chesterfield, Virginia 23803

September 25, 2022

Settlement Class in  
in re Uniti Group Inc. Sec. Litig>  
Master File No. 4:19-cv-00756-BSM (E.D. Ark)

Dear Sir/Madame

I, Joseph C. Robinson, Trustee of Ernestine G. Turner Irrevocable Trust VAD 11/04/1998, request to be excluded from the above settlement class.

Ernestine G. Turner died in January 2016 and the Trust has been closed. As the Trustee of the Trust, I do not recall purchasing, acquisition or sale of Uniti Securities during the time frame of April 24, 2015 to June 24, 2019. I can be reached at the above address or [REDACTED]

Sincerely

*Joseph C. Robinson*  
Joseph C. Robinson, Trustee  
Ernestine G. Turner Trust

South Chesterfield, Va. 23803



7021 2720 0001 4371 3969

RICHMOND

SEP 28 2022

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\$4.60

U.S. POSTAGE PAID  
FORM LETTER  
23803  
COLONIAL HEIGHTS, VA  
SEP 28, 22  
AMOUNT



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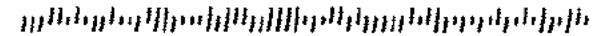
OCT 03 2022

**KCC**

(13)

Uniti Group Inc. Securities Litigation  
c/o KCC LLC  
EXCLUSIONS  
P.O. Box 5100  
Larkspur, Ca 94977-5100

94977-510000



1024



94977



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

**CERTIFIED MAIL**

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Claims Center

## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Jean Brown

Request Number: 0008



Jean Brown

[REDACTED] Paradise, ca 95969 [REDACTED]

Sept 23, 2022

To Whom It May Concern:

I don't believe I have to, YET AGAIN, exclude myself from some stupid class action suit where, as usual, the attorneys make a butt load of money and the "class" makes squat. You should all be ashamed of yourselves. And, you should be reimbursing me for my time to dig up things that happened almost a decade ago.

I am, of course, requesting to be "excluded from the Settlement Class in In re Uniti Group Inc. Sec. Litig., Master File No. 4:19-cv-00756-BSM (E.D.Ark.)."

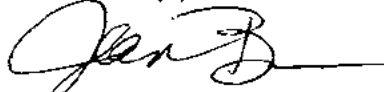
You can find my name, address and phone number at the top of the page. Don't bother to call, we don't answer the phone...

You can find the other info on the included page. I had WIN, not Uniti. But, you probably already know that since you know all kinds of things about me, right?

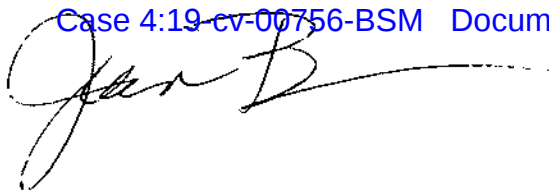
So, because I had to dig up the info from 8 years ago, and (I don't fucking believe this) PAY POSTAGE to mail this to you... I figure you guys owe me for my time, electricity, my bloody finger from tearing off my hangnail because I am so pissed that I have to do this bullshit every month for some class action nonsense. My bill comes to \$300.60. Payment is due upon receipt. My time is valuable too.

If in the future, you are handling another class action suit, and you see my name listed... take out your little gold pen and put a line through it. Don't want any part of this crap.

Very truly yours,



Jean Brown



You should have to pay me for my time to look up this shit that you probably have access to. Plus you make a hell of a lot of money off of these bullshit class action suits.

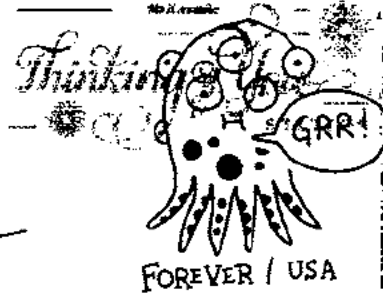
04/27/2015 09:19:10		MANDATORY REVERSE SPLIT (97382A101)
0.00	0.00	0.00
04/27/2015 09:19:10		MANDATORY REVERSE SPLIT (WIN)
0.00	0.00	0.00
04/27/2015 10:56:28		QUALIFIED DIVIDEND (97382A101)
8.52	0.00	0.00
05/01/2015 11:52:34		CASH IN LIEU OF FRACTIONAL SHARES (WIN)
6.16	0.00	0.00
05/07/2015 12:40:15		Sold 21 WIN @ 10.05
201.05	9.99	0.01



Mr. Steven Brown  
Paradise, CA 95969

SACRAMENTO CA 957

26 SEP 2022 PM 4 L



Uniti Group Inc Sec, Litigation  
910 KCC LLC EXCLUSIONS  
P.O. Box 5100

**RECEIVED**

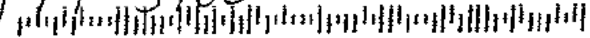
OCT 03 2022

**KCC**

~~LARK~~  
LARK SPUR, CA

94977-510000

94977-5100



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October 3, 2022  
Claims Center

## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Howard B Kay

Request Number: 0009

Howard B. Kay

Silver Spring  
Maryland, 20905

Uniti Group, Inc.  
Securities Litigation  
c/o KCC LLC  
EXCLUSIONS  
P O Box 5100  
Larkspur, CA 94977-5100

September 23rd, 2022

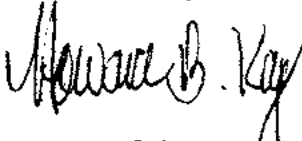
Gentlemen/Ladies:

**This is my request and notice to exclude me in the Uniti Group, Inc.  
Securities Litigation.**

As of the date of this communication, I own 250.4622 shares of Uniti  
Group, Inc.

The shares are held in my IRA Account, showing a loss of \$2600.00.

Yours Truly,

  
Howard B. Kay

Howard B. Ray  
Silver Spring, MD 20905-5906

CAPITAL DISTRICT 208

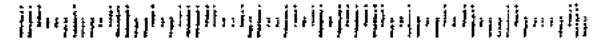
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UNITI GROUP, INC  
SECURITIES LITIGATION  
c/o KCC LLC  
EXCLUSIONS  
P.O. BOX 5100  
LARKSPUR, CA 94977-5100

94977-510000



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## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: U/W Asben A McCurry Jr  
M Randall Scott Trustee

Request Number: 0010

**M. RANDALL SCOTT**  
[REDACTED]  
**CARNESVILLE, GEORGIA 30521**

[REDACTED]

September 27, 2022

Uniti Group Inc. Securities Litigation  
c/o KCC LLC  
EXCLUSIONS  
P.O. Box 5100  
Larkspur, CA 94977-5100

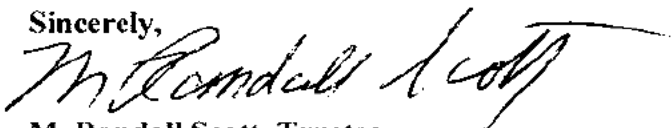
RE: Uniti Group Inc. Sec. Litig., Master File No. 4:19-cv-00756-BSM (E.D. Ark.)

Dear Sirs:

I, M. Randall Scott as Trustee U/W Asben A. McCurry, Jr. do hereby request to be excluded from Settlement Class in re Uniti Group Inc. Sec. Liti., Master File No. 4:19-cv-00756-BSM (E.D. Ark.).

The trust purchased 26 shares of Communications Sales & Leasing, Inc. on 09-26-2011 for \$1,123.11 and sold the 26 shares on 12-15-2015 for \$421.49.

Sincerely,



M. Randall Scott, Trustee



M. Randall Scott

Carnesville, GA 30521-2922

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OCT 05 2022

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EXCLUSIONS  
P.O. Box 5100  
Larkspur, CA 94977-5100

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October 11, 2022  
Claims Center

## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Rosemary Velz

Request Number: 0011

*Rosemary Velz*

[REDACTED] Lewisburg PA 17837

October 3, 2022

KCC LLC  
Exclusions  
PO Box 5100  
Larkspur, CA 94977-5100

RE: Settlement

Dear Sir or Madam –

I am writing to you about the settlement paperwork I received related to the Uniti Group Inc. Securities litigation that was addressed to Peter John Velz at [REDACTED] Lewisburg, PA 17837. Peter died two years ago and I am the sole heir to his estate.

I do not wish to be a part of this lawsuit. Please update your records to show that Peter is deceased, and address any additional communications to me at the address(es) below.

Address until October 20, 2022:

[REDACTED] Lewisburg, PA 17837

Address after October 20, 2022:

[REDACTED]

Thank you,

*Rosemary Velz*  
Rosemary Velz

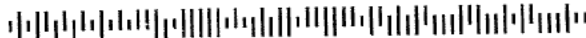
LEWISBURG, PA 17837

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KCC LLC  
Exclusions  
PO Box 5100  
Larkspur, CA 94977-5100



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October 14, 2022  
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## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Carol Ann Haug

Request Number: 0012

OCT. 5, 2022

UNITI GROUP INC. SECURITIES LITIGATION

e/o KCC LLC

EXCLUSION

P.O. BOX 5100

LACKSPUR, CA 94977-5100

TO WHOM IT MAY CONCERN:

I WOULD LIKE TO REQUEST TO BE EXCLUDED FROM THE SETTLEMENT CLASS IN IN RE UNITI GROUP INC. SEC. LITIG, MASTER FILE NO. 4:19-CV-00756-BSM (E.D. ARK)

UNFORTUNATELY I AM UNABLE TO FIND THE PAPER WORK STATING THE NUMBER AND TYPE OF UNITI SECURITIES PURCHASED, ACQUIRED AND SOLD DURING THE CLASS PERIOD, AS WELL AS DATES AND PRICES OF EACH SUCH PURCHASE, ACQUISITION AND SALE.

I HOPE THIS WILL NOT BE A PROBLEM, AS I DO WANT TO BE EXCLUDED.

THANK YOU

CAROL ANN HANG

Carol Ann Hang

WHITE HAVEN, PA 18661

Mrs. Carol Ann Haug  
[Redacted]  
White Haven, PA 18661

LEHIGH VALLEY PA 169

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UNITI GROUP INC SECURITIES LITIGATION

c/o KCC LLC

EXCLUSION

PO BOX 5100

94977-5100  
FARMERSBUR CA 94977-5100



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October 14, 2022  
Claims Center

## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Lana J Fahrenwald

Request Number: 0013



October 4, 2022

Uniti Group Inc. Securities Litigation  
c/o KCC LLC  
EXCLUSIONS  
PO Box 5100  
Larkspur, CA 94977-5100

**I ABSOLUTELY DO NOT WANT TO BE INCLUDED IN THE SETTLEMENT CLASS AND REQUEST EXCLUSION FROM THE SETTLEMENT CLASS** in Re Uniti Group Inc. Sec. Litig., Master File No. 4:19-cv-00756-BSM (E.D. Ark.).

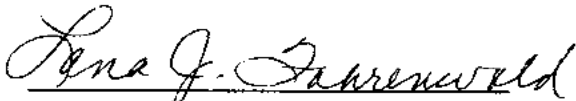
My name is Lana J Fahrenwald

Address: [REDACTED]  
Yuma, AZ 85367

Phone: [REDACTED]

I own 600 Uniti shares

200 shares purchased	4/24/2018	@\$16.6549
200 shares purchased	5/10/2018	19.64
200 shares purchased	1/10/2019	17.997



Date: October 4, 2022

*Yuma, AZ 85367*

PHOENIX AZ 852  
PHOENIX AZ 852  
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*Uniti Group Inc. Securities Litigation*  
*C/o KCC LLC*  
*Exclusions*  
*PO Box 5100*

~~98497755 0000~~ *Perkspan, PA 94977-5100*

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## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Earl B Brown Jr.

Request Number: 0014

October 7, 2022

To Whom It May Concern:

I request to be excluded from the settlement class in *In re Uniti Group Inc. Sec Litig.* Master File No. 4:19-cv-00756-BSM (E.D. Ark).

1. Earl B Brown, Jr

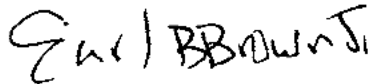
[REDACTED]

St Augustine, FL 32080

[REDACTED]

2. My financial advisor found no evidence that I ever held shares in Uniti; so I am unable to list purchases and sales.

Sincerely,



Earl B Brown Jr.

Earl Brown  
St. Augustine, FL 32080

JACKSONVILLE FL 320

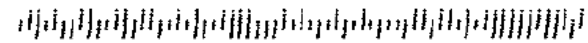
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OCT 14 2022  
CLAIMS CENTER

Uniti Group Inc. Securities Litigation  
c/o KCC LCC  
EXCLUSIONS  
PO # 5100  
Larkspur, CA 94977-5100

94977-510000



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October 18, 2022  
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## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Joyce A Bush

Request Number: 0015

October 3, 2022

Uniti Group Inc Securities Litigation  
c/o KCC LLC  
**Exclusions**  
P O Box 5100  
Larkspur, CA 94977-5100

Dear Sir,  
PLEASE EXCLUDE Joyce A. Bush from the SETTLEMENT CLASS in IN RE UNITI  
GROUP INC. SEC. LITIG., MASTER FILE NO 4:19- cv-00756-BSM (E.D. Ark)

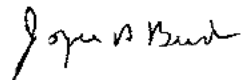
Joyce A. Bush

[REDACTED]  
Glen Allen, VA 23060

[REDACTED]  
The information you are requesting concerning the number of units, I do not have and do not know if my broker purchase any units. So, I want to be exclude from the above settlement of class action.

Thank you.

Sincerely,



Joyce A Bush

J. Bush  
Glen Allen, VA 23060



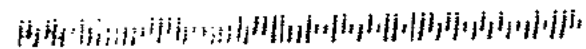
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BY: .....

Uniti Group Inc Securities Litigation  
c/o KCC LLC  
**Exclusions**  
P O Box 5100  
Larkspur, CA 94977-5100

94977-510000





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October 24, 2022  
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## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Victoria Good


Request Number: 0016

Victoria Good maiden name Mills from [REDACTED] Lawton, OK of Comanche County is excluded from the Settlement Class in In re Uniti Group Inc. Sec. Litig., Master File No. 4:19-cv-00756-BSM (E.D. Ark.).

FOR COMMON SHARES  
TYPE

*NE Good*

13 OCT 2022  
17 SHABIANI

Robinhood 

[REDACTED]  
[REDACTED]

10/13/2021

VICTORIA MILLS [REDACTED]

[REDACTED] Lawton, OK 735076638

Equities/Options	B/S	Trade	Settle Date	Acct Type	Price	QTY	Principal	Comm	Tran Fee	Net Amount	MKT	CAP	U/S
------------------	-----	-------	-------------	-----------	-------	-----	-----------	------	----------	------------	-----	-----	-----

Total Quantity Bought:

Total Dollars Bought:

Total Quantity Sold:

Total Dollars Sold:



Mr Kenneth Good

Lawton, OK 73507

OKLAHOMA CITY OK 73103

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OCT 24 2022

BY:.....

UNITI GROUP INC. SECURITIES  
LITIGATION  
c/o KCC LLC  
EXCLUSIONS  
PO BOX 5100

~~UNITI GROUP INC. SECURITIES LITIGATION~~

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October 24, 2022  
Claims Center

## **Exclusion Cover Page**

Case Name: Uniti Group Inc, Securities Litigation

Case Code: UII

Exclusion Deadline: October 14, 2022 (received no later than)

Name of Person Filing Exclusion: Kenneth Good

Request Number: 0017

Kenneth Good from [REDACTED] Lawton, OK of Comanche County is excluded from the Settlement Class in In re Uniti Group Inc. Sec. Litig., Master File No. 4:19-cv-00756-BSM (E.D. Ark.).

FOR COMMON SHARES  
TYPE

[REDACTED]

*Kenneth Good*

13 OCT 2022

17 SABIANI



**E\*TRADE**  
Investment Account

**TRADE CONFIRMATION**

Account Number [REDACTED]

Account Name:  
KENNETH GOOD

[REDACTED]

**Customer Update**

Tax questions? No problem. Get helpful tips, tools, and key dates in the Tax Center. Visit [etrade.com/tax](http://etrade.com/tax) today.

TRADE DATE	SETL DATE	MKT/ CPT	SYMBOL/ CUSIP	BUY/ SELL	QUANTITY	PRICE	ACCT TYPE		
01/21/22	01/25/22	5 1	UNIT	SELL	41	\$12.12	Cash	PRINCIPAL	\$496.92
								FINRA TAF	\$0.01
								FEE	\$0.01
								<b>NET AMOUNT</b>	<b>\$496.90</b>

UNITI GROUP INC COMMON STOCK

▲ DETACH HERE

KENNETH GOOD  
LAWTON OK 73507-6638

DETACH HERE ▲

**Use This Deposit Slip**

[REDACTED]

Please do not send cash

Dollars	Cents

Make checks payable to E\*TRADE Securities LLC.  
Mail deposits to:

TOTAL DEPOSIT

E\*TRADE Securities LLC  
P.O. Box 484  
Jersey City, NJ 07303-0484

[REDACTED]





E\*TRADE  
Investment Account

**TRADE CONFIRMATION**

Account Number: [REDACTED]

Account Name:  
KENNETH GOOD



**Customer Update**

Visit the E\*TRADE Security Center at [us.etrade.com/security-center](https://us.etrade.com/security-center) to learn more about how we work to secure your account.

TRADE DATE	SETL DATE	MKT / CPT	SYMBOL / CUSIP	BUY / SELL	QUANTITY	PRICE	ACCT TYPE		
10/04/17	10/06/17	6 1	UNIT	BUY	41	\$14.50	Cash	PRINCIPAL	\$594.50
								COMMISSION	\$4.95
								<b>NET AMOUNT</b>	<b>\$599.45</b>

UNIT GROUP INC COMMON STOCK

▲ DETACH HERE  
KENNETH GOOD  
LAWTON OK 73507-7124

DETACH HERE ▲

Use This Deposit Slip

Please do not send cash

Dollars	Cents

TOTAL DEPOSIT

Make checks payable to E\*TRADE Securities LLC.  
Mail deposits to:

E\*TRADE Securities LLC  
PO Box 484  
Jersey City, NJ 07303-0484



Mr Kenneth Good  
Lawton, OK 73507

OKLAHOMA CITY OK 730

13 OCT 2022 PM 6 L



RECEIVED  
OCT 24 2022

BY: .....

UNITI GROUP INC. SECURITIES  
LITIGATION  
c/o KCC LLC  
EXCLUSIONS  
PO BOX 5100

5452 ESPR C N 94 9177 87108