

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WILLIAM McGEE and LEE McGEE,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

vs.

CONSTANT CONTACT, INC., et al.,

Defendants.

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) No. 1:15-cv-13114-MLW

) CLASS ACTION

) SUPPLEMENTAL DECLARATION OF  
) ROSS D. MURRAY REGARDING NOTICE  
) DISSEMINATION AND REQUESTS FOR  
) EXCLUSION RECEIVED TO DATE

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 3301 Kerner Blvd., San Rafael, California. Pursuant to this Court’s November 26, 2019 Order Preliminarily Approving Settlement and Providing for Notice (“Preliminary Approval Order”), Gilardi was appointed to supervise and administer the notice procedure as well as the processing of claims in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”). I oversaw the notice services that Gilardi provided in accordance with the Preliminary Approval Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date, dated March 30, 2020 (the “Initial Mailing Declaration”). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and, if called to testify I could and would do so competently.

**UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE**

3. As more fully detailed in the Initial Mailing Declaration, as of March 30, 2020, Gilardi had mailed 20,822 copies of the Notice of Proposed Settlement of Class Action (the “Notice”) and the Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

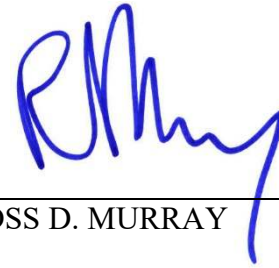
4. Since March 30, 2020, Gilardi has mailed an additional 1,493 copies of the Claim Package in response to additional requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which a new address was identified and re-mailed to that new address. Therefore, as of May 12, 2020, Gilardi has mailed a total of 22,315 Claim Packages to potential Class Members and nominees.

**REQUESTS FOR EXCLUSION RECEIVED TO DATE**

5. Pursuant to the Preliminary Approval Order, the Notice informed potential Class Members that written requests for exclusion from the Class were to be mailed to *Constant Contact Securities Litigation*, c/o Gilardi & Co. LLC, EXCLUSIONS, 3301 Kerner Blvd., San Rafael, CA 94901, such that they are postmarked no later than April 24, 2020. As reported in the Initial Mailing Declaration, as of March 30, 2020, Gilardi had received three requests for exclusion from the Class at this mailing address. See Initial Mailing Declaration, ¶16.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has received one late request for exclusion, a redacted copy of which is attached as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of May, 2020, at San Rafael, California.



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ROSS D. MURRAY

# EXHIBIT A



RECEIVED *MS*  
MAY 04 2020  
CLAIMS CENTER

## Exclusion Cover Page

Case Name: Constant Contact, Inc.

Case Code: CC2

Exclusion Deadline: April 24, 2020 (Postmarked Date)

Name of Person Filing Exclusion: Tina Greco-Steinmeyer

Constant Contact Securities Litigation  
Claims Administrator  
EXCLUSIONS  
c/o nGilarid & Co. LLC  
3301 Kerner Blvd  
San Rafael, CA 94901

To Whom it may Concern,

I am requesting to be exclusion from the Class in the Constant Contact Securities Litigations. **NO 1:15-CV-13114-MLW**

Please refer to Lincoln Financial if you feel I have I have purchases', acquisitions or sales of constant contact common during your class period


I do not have access to this information and as a Class Action Law Firm you should know every day common citizens don't have access to our 401K

I am represented by counsel on these matters and have a conflict of interest in any and all Class Action Lawsuit as Robbins is a past legal counselor for my husband.

I also do know that you have the means to provide to class members the idea of opting out via telephone and/or via on-line.

I also am aware that most all courthouses are closed until further notice so a deadline shouldn't matter due to Covid-19.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tina Greco-Steinmeyer', written over the word 'Sincerely,'.

Tina Greco-Steinmeyer




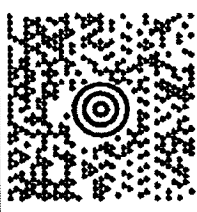
All items must be sent by **Mar 5, 2019**. Tell us about your return experience.

**Additional instructions for mailing your package**

- Ensure that there are no other tracking labels attached to your package. If you are shipping a non-hazardous item, completely remove or cover any hazardous materials markings.
- Affix the mailing label squarely onto the address side of the parcel, covering up any previous delivery address and barcode without overlapping any adjacent side.
- Take this package to a UPS location. To find your closest UPS location, visit the UPS Drop Off Locator or go to [www.ups.com](http://www.ups.com).

**Return Mailing Label**

Cut this label and affix to the outside of the return package

|   |  |  |  |
|---|--|--|--|
| 1 of 1  | <b>RS</b>  | <b>AZ 850 9-84</b>   | <b>06</b>  |
| 16 LBS  | SHIP<br>TUS1 06 AMAZON RETURNS<br>5333 W. LOWER BUCKEYE ROAD<br>TO: PHOENIX AZ 85043 | <br><b>UPS GROUND</b><br>TRACKING #: 1Z 975 8R1 90-0752 6883 | <br>DZtHGj qxRRMA |
|  |   | BILLING: P/P<br>DESC: RETURNED MERCHANDISE<br>RETURN SERVICE<br>Reference No: DZtHGj qxRRMA  |  |

**Item Descriptions**

**Quantity**

Pockit Lightweight Stroller

1





FOREVER / USA

PM 4 L  
APR 2020

Constant Contact Securities Litigation  
Claims Administrator  
c/o Gillardi & Co. LLC  
P.O. Box 43321  
Providence, RI 02940-3321

RECEIVED MAY 14 2020

CC2

