

Distribution. CDAS submits this declaration in support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement. Dkt. No. 363.

3. In connection with the settlement Plan of Distribution, specifically, we were asked by Class Counsel to serve as Authors' Counsel. At the same time, Class Counsel requested that additional counsel join the case to serve as Publishers' Counsel. In our additional role as Authors' Counsel, we provided specific work directly on the Class List; on the Plan of Distribution, Claim Form, and Class Notice; and with stakeholders on the Class List, including soliciting input from these stakeholders.

4. In our additional role as Authors' Counsel, we were also involved in advising and assisting Class Counsel with the compilation of the Works List, including by improving the methods by which works were assessed for satisfaction of the class criteria. In particular, we assisted Class Counsel with developing a method to ensure that works published immediately prior to the introduction of ISBNs and the full digitization of copyright records—i.e. from the 1964-1977 period—were included on the Works List despite the significant challenges associated with their inclusion (e.g. the fragmentary nature of the records regarding these works).

5. We additionally advised and aided Class Counsel in determining which renewal registrations satisfied the class criteria.

6. Because much of this work involved manual review and because of the specialized nature of these reviews, we assigned CDAS attorneys and staff members to work under Class Counsel's supervision. As a result of our efforts, Class Counsel was able to verify tens of thousands of additional works for inclusion on the Works List.

7. With respect to notice, author group stakeholders facilitated the connection of Class Counsel to author groups and to the major literary agencies.

8. We reviewed all versions the proposed Plan of Distribution, Claim Form, and Class Notice, as well as all other information, for compliance with relevant copyright laws. We also focused on ensuring that each document described the Settlement—and the requirements to submit a claim, opt out, or object—in a way that would be familiar and understandable to both authors and publishers. We aimed to ensure the highest possible understanding of the Settlement, so that class members could make informed decisions about the Settlement.

9. And finally, above all else, we endeavored to ensure that all terms of the Settlement including the Plan of Distribution, Claim Form, and Class Notice, are fair adequate and reasonable for authors in the Class.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and recollection.

Executed in New York, NY on September 22, 2025.

/s/ Nancy E. Wolff
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