

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MEREDITH CORPORATION, et al.	:	Case No. 09 Civ. 9177 (PAE)
	:	
v.	:	DECLARATION OF TEERAVAT PAWASITTICHOT IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT
SESAC, LLC, et al.	:	

I, Teeravat Pawasittichot, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the office manager of the Television Music License Committee, LLC (the "TMLC"), a position I have held since September 2007. I am also an assistant to Willard Hoyt, Executive Director of the TMLC. My responsibilities include various administrative and accounting tasks, including vendor billing, financial record keeping, and preparation of financial reports. I also maintain the TMLC website, <https://tvmlc.com/>, which contains updates on the TMLC's dealings with the three performance rights organizations (ASCAP, BMI, and SESAC) and developments in the antitrust litigation against SESAC. I submit this Declaration in support of Plaintiffs' Unopposed Motion for Final Approval of Settlement.

2. I oversaw the distribution of the Court-approved notice of the proposed settlement to class members by a third-party mail house that the TMLC has used regularly over the years to communicate with local television stations. To identify the most current contact information for the representatives of the local television stations, I relied on both the TMLC's database as well as the mailing addresses of each member of the settlement class provided by SESAC.

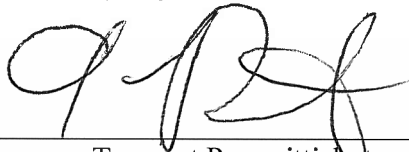
3. On November 3, 2014, the notice was emailed to over 600 station representatives and 25 station groups representing over 500 stations (including some overlap with the station

representatives), as well as to nearly 50 state television broadcast associations (who, in turn, reach a number of additional local television stations). On November 5, 2014, the notice was sent via first class direct mail to over 2,700 representatives of the more than 1,200 local television stations that make up the settlement class, as well as the same broadcast associations that received the email notice. Since the distribution list for the notice contained multiple contacts at a given local television station, out of an abundance of caution, settlement notices were sent to all of them. Even accounting for some returned mailings, notice reached virtually all stations either through a direct contact at the stations, through a direct contact at the group that the stations are owned by or affiliated with, and/or through one of the state television broadcast associations.

4. I have also posted on <https://tvmlc.com/sesac/sesac-settlement/> the class action settlement notice, the motion for preliminary approval of settlement, the motion for award of attorney's fees and expenses, and all related materials, promptly after they were filed with the Court.

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

Dated: New York, NY
December 22, 2014



Teeravat Pawasittichol