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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE COGNIZANT TECHNOLOGY  
SOLUTIONS CORPORATION  
SECURITIES LITIGATION

Civil Action No. 16-6509 (ES)  
(CLW)

**NOTICE OF LEAD PLAINTIFFS' MOTION TO  
ACCEPT ADDITIONAL LATE OR LATE-ADJUSTED CLAIMS**

TO: All persons on ECF service list

PLEASE TAKE NOTICE that on April 3, 2023, or at an earlier date and  
time as the Court shall determine, Lead Plaintiffs, Union Asset Management

Holding AG, Amalgamated Bank, as Trustee for the LongView Collective Investment Funds, and the Fire and Police Pension Association of Colorado, on behalf of themselves and the Settlement Class, will move this Court for entry of the accompanying [Proposed] Revised Class Distribution Order. In further support of this motion, Lead Plaintiffs submit (i) the Supplemental Declaration of Luiggy Segura in Support of Lead Plaintiffs' Motion to Accept Additional Late or Late-Adjusted Claims ("Supplemental Segura Declaration") submitted on behalf of the Court-approved Claims Administrator, JND Legal Administration ("JND"); (ii) the Memorandum of Law in Support of Lead Plaintiffs' Motion to Accept Additional Late or Late-Adjusted Claims; and (iii) all other papers and proceedings herein.

The Revised Class Distribution Order would, among other things: (i) approve the administrative determinations of JND accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action, including all Claims received by the Claims Administrator on or before March 1, 2023; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by JND as valid and approved by the Court ("Authorized Claimants"), while maintaining a Reserve for any tax liability or claims administration-related contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 90 days after the issue date; (iv) direct that Authorized Claimants will forfeit all recovery from the

Settlement if they fail to cash their distribution checks in a timely manner; (v) approve the recommended plan for any funds remaining after the distribution; (vi) approve JND's fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration process; and (viii) authorize the destruction of Claim Forms and supporting documents at an appropriate time.

Pursuant to the terms of the Stipulation, Defendants have no interest in the relief sought by the motion. Accordingly, Lead Plaintiffs respectfully submit that the motion is ripe for consideration by the Court and may be decided on the papers.

Dated: March 2, 2023

**LOWENSTEIN SANDLER LLP**

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*Lead Counsel for Lead Plaintiffs and  
the Settlement Class*

**CERTIFICATION OF SERVICE**

I hereby certify that on March 2, 2023, I caused the foregoing Notice of Lead Plaintiffs' Motion for Accept Additional Late or Late-Adjusted Claims to be electronically filed with the Clerk of the Court using the ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

Dated: March 2, 2023

*s/ Michael B. Himmel*

Michael B. Himmel

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE COGNIZANT TECHNOLOGY  
SOLUTIONS CORPORATION  
SECURITIES LITIGATION

Civil Action No. 16-6509 (ES)  
(CLW)

Motion Date: April 3, 2023

**MEMORANDUM OF LAW IN SUPPORT OF  
LEAD PLAINTIFFS' MOTION TO ACCEPT  
ADDITIONAL LATE OR LATE-ADJUSTED CLAIMS**

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*Lead Counsel for Lead Plaintiffs  
and the Settlement Class*

Lead Plaintiffs, Union Asset Management Holding AG, Amalgamated Bank, as Trustee for the LongView Collective Investment Funds, and the Fire and Police Pension Association of Colorado (collectively “Lead Plaintiffs”), respectfully move for entry of the proposed Revised Class Distribution Order that will allow payment from the proceeds of the \$95 million Settlement in this securities class action for additional, otherwise eligible Claims that were received or adjusted from December 2, 2022, through March 1, 2022.<sup>1</sup> Granting this relief will allow additional Settlement Class Members who have suffered harm to share in the recovery.

On December 9, 2022, Lead Plaintiffs filed their Unopposed Motion for Approval of Distribution Plan (ECF No. 187) (“Distribution Motion”), which is currently pending before the Court. The Distribution Motion requested that the Court enter a proposed Class Distribution Order that would have, among other things, approved JND’s administrative determinations accepting and rejecting Claims submitted in connection with the Settlement by December 1, 2022, and directed the distribution of the Net Settlement Fund to the eligible Claimants. *See* ECF No. 187-10. The proposed Class Distribution Order would also have directed that no new

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<sup>1</sup> Unless otherwise indicated in this memorandum, all terms with initial capitalization shall have the meanings ascribed to them in the Declaration of Luiggy Segura (ECF No. 187-2) (“Segura Declaration” or “Segura Decl.”), the Supplemental Declaration of Luiggy Segura in Support of Lead Plaintiffs’ Motion to Accept Additional Late or Late-Adjusted Claims (“Supp. Segura Decl.”) filed herewith, or the Stipulation and Agreement of Settlement dated September 2, 2021 (ECF No. 165-3) (“Stipulation”).

Claims be accepted after December 1, 2022, and no further adjustments to Claims received on or before December 1, 2022, that would result in an increased Recognized Claim amount be made for any reason after December 1, 2022, subject to exceptions arising when further distribution of the Net Settlement Fund is not cost-effective. *See id.*

Since the preparation of Lead Plaintiffs' Distribution Motion, the Claims Administrator, JND Legal Administration ("JND"), has fully processed 281 Claims that were submitted after December 1, 2022, or for which adjustments were received after December 1, 2022 ("Additional Late or Late-Adjusted Claims"). *See* Supp. Segura Decl. ¶ 3. JND has determined that 204 of these Claims are, but for their late submission, otherwise eligible for payment from the Net Settlement Fund. *See* Supp. Segura Declaration ¶ 4 and Exhibit A. The total Recognized Claim amount of these eligible Additional Late or Late-Adjusted Claims is \$2,891,387.64. *Id.* JND has determined that the remaining 77 Additional Late or Late-Adjusted Claims are ineligible to participate in the Settlement. *See* Supp. Segura Decl. ¶ 5 and Exhibit B.

Although these 204 eligible Additional Late or Late-Adjusted Claims were submitted to JND or adjusted since the filing of the Distribution Motion currently pending before the Court, the processing of these Additional Late or Late-Adjusted Claims has not delayed the completion of the Claims administration process or the distribution of the Net Settlement Fund. *Id.* ¶ 7 The Court has discretion to accept



Claims received after the Claim submission deadline. *See* Preliminary Approval Order ¶ 11; Notice ¶ 51.

Lead Plaintiffs respectfully submit that, when the equities are balanced, it would be unfair to prevent otherwise eligible Claims from participating in the distribution of the Net Settlement Fund solely because they were received or corrected after the Court-approved Claim submission deadline if the processing of the Claims remained feasible and would not delay payment to other Claimants. Accordingly, Lead Plaintiffs request that the Court permit these eligible Additional Late or Late-Adjusted Claims be included in the Claims that are approved for payment under the Settlement.

Specifically, Lead Plaintiffs request that the Court enter a Revised Class Distribution Order that will permit JND to make an Initial Distribution of the Settlement proceeds to eligible Claimants whose Claims were received by JND through March 1, 2023.<sup>2</sup> Among other things, the Revised Class Distribution Order

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<sup>2</sup> To facilitate the efficient distribution of the Net Settlement Fund, however, there must be a final cut-off date after which no other Claims may be accepted. Accordingly, Lead Plaintiffs respectfully request that the Court order that any *new* late Claims (and any requested adjustments to previously filed Claims that would result in an increased Recognized Claim Amount) received after March 1, 2023, shall be barred (*see also* Segura Decl. ¶ 45(f)) – subject to the proviso that if Lead Counsel later determines that an additional distribution is not cost-effective (*see also* Segura Decl. ¶ 45(e)), then any post-March 1, 2023 Claimants may, at the discretion of Lead Counsel (and to the extent possible after paying remaining administrative fees and expenses owed), be paid on their new (or adjusted) Claims on a *pro rata*

will approve JND's administrative determinations accepting and rejecting Claims submitted in connection with the Settlement on or before March 1, 2023, including the 281 Claims that were submitted after December 1, 2022, or for which adjustments were received after December 1, 2022. In all other respects the proposed Revised Class Distribution Order is the same as the Class Distribution Order submitted with Lead Plaintiffs' December 9, 2022 Distribution Motion. *See* ECF No. 187-10.

For the foregoing reasons, Lead Plaintiffs respectfully request that the Court grant both their pending Distribution Motion (ECF No. 187) and Lead Plaintiffs' current Motion to Accept Additional Late or Late-Adjusted Claims. Entry of the attached [Proposed] Revised Class Distribution Order will resolve both motions.

Dated: March 2, 2023

Respectfully submitted,

**LOWENSTEIN SANDLER LLP**

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Michael B. Himmel

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*Liaison Counsel for Lead Plaintiffs  
and the Settlement Class*

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basis so as to bring them into parity with other Authorized Claimants who have cashed their distribution checks.

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Jesse.Jensen@blbglaw.com

*Lead Counsel for Lead Plaintiffs and  
the Settlement Class*

**CERTIFICATION OF SERVICE**

I hereby certify that on March 2, 2023, I caused the foregoing Memorandum of Law in Support of Lead Plaintiffs' Motion to Accept Additional Late or Late-Adjusted Claims to be electronically filed with the Clerk of the Court using the ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

Dated: March 2, 2023

*s/ Michael B. Himmel*

Michael B. Himmel

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE COGNIZANT TECHNOLOGY  
SOLUTIONS CORPORATION  
SECURITIES LITIGATION

Civil Action No. 16-6509 (ES)  
(CLW)

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA  
IN SUPPORT OF LEAD PLAINTIFFS' MOTION TO ACCEPT  
ADDITIONAL LATE OR LATE-ADJUSTED CLAIMS**

I, Luiggy Segura, hereby declare under penalty of perjury as follows:

1. I am the Vice President of Securities Operations at JND Legal Administration ("JND"). I am over 21 years of age and am not a party to the above-captioned action ("Action").<sup>1</sup> I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently thereto.

2. JND serves as Claims Administrator in connection with the Settlement of this Action. As set forth in the Segura Declaration submitted in support of Lead Plaintiffs' Unopposed Motion for Approval of Distribution Plan (ECF No. 187) (the "Distribution Motion"), JND previously completed processing all Claims received through December 1, 2022, in accordance with the terms of the Stipulation and the

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<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 as of September 2, 2021 (ECF No. 165-3) ("Stipulation"), or the Declaration of Luiggy Segura in Support of Lead Plaintiffs' Unopposed Motion for Approval of Distribution Plan (ECF No. 187-2) ("Segura Declaration" or "Segura Decl.").

Court-approved Plan of Allocation set forth in the Notice and submitted its administrative determinations accepting and rejecting those Claims in preparation for a distribution of the Net Settlement Fund to Authorized Claimants. *See Segura Decl.* ¶ 3.

3. Since the preparation of the Distribution Motion, which was filed on December 9, 2022, JND has received a total of 281 Claims that were submitted after December 1, 2022, or for which adjustments were received after December 1, 2022 (“Additional Late or Late-Adjusted Claims”), with the following status:

- a) 6 Claims were deficient and never cured;
- b) 15 Claims did not result in a Recognized Claim pursuant to the Court-approved Plan of Allocation;
- c) 56 Claims did not fit the definition of the Settlement Class;  
and
- d) 204 Claims were determined to be valid.

**RECOMMENDATIONS FOR APPROVAL**

4. As noted above, of the 281 Additional Late or Late-Adjusted Claims received, 204 have been determined to be eligible to participate in the Settlement. The total Recognized Claim amount for these eligible Additional Late or Late-Adjusted Claims is \$2,891,387.64. This is in addition to the aggregate Recognized Claim amounts provided in my prior declaration. JND requests that the Additional

Late or Late-Adjusted Claims that are otherwise eligible be approved for payment because their approval would not delay payment to any other Claimants.

5. An additional 77 Claims were received but determined to be ineligible Additional Late or Late-Adjusted Claims.

6. The Exhibits attached hereto list all of the Additional Late or Late-Adjusted Presented Claims:

- (a) Exhibit A lists the eligible Additional Late or Late-Adjusted Claims and shows each Claimant's new or adjusted Recognized Claim; and
- (b) Exhibit B lists the ineligible Additional Late or Late-Adjusted Claims and the reason for their rejection.

### **CONCLUSION**

7. Although these 204 Claims were late-filed or had late-filed adjustments since the filing of Lead Plaintiffs' Unopposed Motion for Approval of Distribution Plan currently pending before the Court, the processing of these late Claims did not delay the completion of the Claims administration process or the distribution of the Net Settlement Fund. JND, therefore, respectfully requests that the Court enter the Revised Class Distribution Order approving JND's administrative determinations accepting and rejecting the additional Claims submitted herein along with those presented in my earlier declaration in support of the Distribution Motion filed on

December 9, 2022, and approving the proposed Distribution Plan with a modified cutoff date of March 1, 2023, to permit the acceptance of the eligible Additional Late or Late-Adjusted Claims.

I declare under 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.

Executed on March 2, 2023

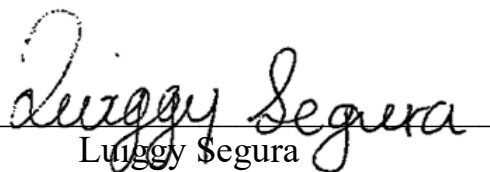
  
Luggy Segura



EXHIBIT A  
ADDITIONAL LATE  
OR LATE-ADJUSTED  
BUT OTHERWISE  
ELIGIBLE CLAIMS



**COGNIZANT SECURITIES LITIGATION**  
**ADDITIONAL LATE OR LATE-ADJUSTED BUT OTHERWISE ELIGIBLE CLAIMS**

TOTAL CLAIMS: 204

TOTAL RECOGNIZED CLAIMS: \$2,891,387.64

CLAIM	RECOGNIZED CLAIM	CLAIM	RECOGNIZED CLAIM
D2857GP4HA	\$ 535.50	DJRWX6B52G	\$ 623.71
D2C3X94ZTM	\$ 1,575.90	DJXDUPFS8N	\$ 497.25
D2EVBTYDPM	\$ 516.04	DJZKMC2Q46	\$ 336.60
D2GUNCVD7P	\$ 722.88	DK8ZBMHLD3	\$ 252.45
D2NLXDEGV5	\$ 209.50	DKEHF526YZ	\$ 263.70
D2R8L6CJFU	\$ 207.15	DKJTAZFS9B	\$ 444.15
D2SV8W76JK	\$ 1,422.90	DKM8EHZ9UJ	\$ 1,354.05
D2WJZVLAYB	\$ 126.43	DKMAT5WY67	\$ 1,114.12
D2ZTDQLNK3	\$ 634.95	DKQ8M6DAX7	\$ 84.15
D35CT2VAKF	\$ 543.15	DKWYF69ENG	\$ 456.21
D36A7FR2HT	\$ 175.95	DKZX3RPBH9	\$ 75.60
D39PAU5S6H	\$ 198.90	DL6T3J4GEU	\$ 1,515.03
D3RUV5F2D6	\$ 596.70	DL7WFTPUVG	\$ 99.45
D3V4EMHTAD	\$ 952.01	DLDJV4TQUA	\$ 962.64
D3VPANDJG7	\$ 11,142.15	DLG93KR7WE	\$ 452.68
D4823B5FAL	\$ 1,064.69	DLMPRQV2UX	\$ 1,086.36
D4835R9XDV	\$ 505.61	DLN2Q6X7VP	\$ 1,706.87
D4CHR36KSZ	\$ 650.25	DLSYVRJGQZ	\$ 1,663.55
D4LR8JKEN6	\$ 587.22	DM4TFY2X37	\$ 1,251.56
D54K29D8TQ	\$ 1,231.65	DM8XCHB2PA	\$ 584.30
D56QV2BXFN	\$ 503.21	DM8YARG2Z7	\$ 252.45
D5AZ8NB9W2	\$ 395.22	DMEL7QWVHU	\$ 47.27
D5EFDYTJ7U	\$ 130.16	DMKB7JTG48	\$ 3,257.14
D5GJMRK8YP	\$ 1,568.25	DMUQ2D9BE7	\$ 458.83
D5H6UTSZGQ	\$ 781.82	DMY3RSFDC7	\$ 1,170.45
D5QDW2TPKL	\$ 2,428,024.72	DMYD7W35HT	\$ 500.30
D6F35GANUZ	\$ 6,803.66	DMZNH429TC	\$ 1,361.70
D6H58NFV7Z	\$ 562.97	DN6AJ8SYV2	\$ 89.92
D6KMJVG7A9	\$ 340.45	DNCWMARF5L	\$ 99.45
D6L42JVBEA	\$ 122.40	DNDRF4YUGS	\$ 466.65
D6VZJD3YW7	\$ 168.30	DNK7R3DXTF	\$ 657.99
D6ZQGM4A39	\$ 1,652.40	DNKYJUQMPW	\$ 1,142.40
D7MXCFPEUY	\$ 367.87	DNQ6VFTHWU	\$ 1,135.51
D86RZVASQB	\$ 789.84	DNUG9KZHSV	\$ 301.78
D8AV5LKETG	\$ 435.02	DNV6FEW3MC	\$ 1,300.50

**TOTAL CLAIMS: 204**  
**TOTAL RECOGNIZED CLAIMS: \$2,891,387.64**

CLAIM	RECOGNIZED CLAIM	CLAIM	RECOGNIZED CLAIM
D8E7K6Y5U4	\$ 1,345.14	DP4H3GWZL7	\$ 726.75
D8GYSPLN7A	\$ 750.99	DP8XZKFUM2	\$ 1,412.61
D8QEVZB4LS	\$ 1,208.11	DPD5JHS4GB	\$ 933.30
D93K4GEACS	\$ 352.34	DPLNDKQJA3	\$ 252.45
D93LCEZMJS	\$ 1,663.84	DPMUCZB38R	\$ 206.55
D9A5TXQGP8	\$ 234.04	DPQEJDYXST	\$ 1,874.25
D9BLSZ2YHN	\$ 63,950.21	DQ3PGWFY9U	\$ 729.43
D9C2MKYZFR	\$ 812.14	DQS8B53RXE	\$ 596.70
D9F2GXE6BS	\$ 702.33	DQTWKC6UMG	\$ 244.80
D9PQ42GTA3	\$ 303.48	DR2UWCT7M8	\$ 713.37
DA24NPJZ57	\$ 627.30	DR465JE8ZY	\$ 436.05
DA2LWTMS65	\$ 817.50	DR4G5Z2KSY	\$ 206.55
DA6TVN3ZGS	\$ 214.20	DR5LHYKXE6	\$ 54.73
DAFRHV68DG	\$ 730.43	DR5NFTGB7W	\$ 221.85
DAJ5XDLYH4	\$ 275.35	DR86X72K4S	\$ 561.46
DAKPD4GBLJ	\$ 339.60	DREMF94W5J	\$ 734.40
DAV58UBCR6	\$ 18,733.80	DRT4CZP2HQ	\$ 657.90
DAX7E5UTHQ	\$ 378.30	DS5E69NM3J	\$ 1,262.25
DB47TQSZ9U	\$ 229.50	DS6F4CXTQE	\$ 711.45
DBEYRU7W85	\$ 1,751.85	DSFGA8TVHU	\$ 237.15
DBZAKRXHE4	\$ 244.29	DSJF63MYLX	\$ 1,652.40
DBZY3HLQ4F	\$ 548.31	DSLZ4TWPJ9	\$ 1,351.35
DC5AKS3B67	\$ 53.55	DT6SAFXHZU	\$ 22.12
DC6YL47FQZ	\$ 329.90	DTBXCZF9MA	\$ 437.90
DC9YDWM7ZS	\$ 1,081.97	DTEV7B65LR	\$ 552.84
DCHKL76NTU	\$ 818.55	DTGQJ6V45H	\$ 405.45
DCLWKYJ342	\$ 317.24	DTVWSERDY8	\$ 1,101.60
DCW58YB7UJ	\$ 27,352.00	DTYFG7VDBL	\$ 622.08
DD6F2SX5AG	\$ 390.15	DTYG97ZXE2	\$ 344.25
DDGKF69XJS	\$ 520.20	DTYP63R9NU	\$ 244.80
DDN4FC3TWX	\$ 448.35	DTZYE4GBH2	\$ 367.20
DDVHCFJU8X	\$ 810.90	DU49DZRW8L	\$ 615.61
DDVHX9WKRL	\$ 80,325.00	DU695SA7GB	\$ 777.39
DDVYSP64QT	\$ 582.93	DUEGSNVPTX	\$ 76.50
DE42Z5CAY9	\$ 12,087.72	DUKS8CJX2D	\$ 336.60
DE68CLQWJ3	\$ 573.75	DUM9GQ3JYV	\$ 175.95
DEAXHDQY72	\$ 1,427.10	DUXKPGBNME	\$ 676.65
DELV7K3QS4	\$ 2,474.48	DV2YLSCZM8	\$ 700.21
DENRALQ3WZ	\$ 736.61	DVAQZUWCPD	\$ 53.55
DEXH8PL7W3	\$ 606.90	DVUP5S6Y78	\$ 420.54
DEXQS8MRL7	\$ 264.02	DW4EFRYASH	\$ 1,201.05

**TOTAL CLAIMS: 204**  
**TOTAL RECOGNIZED CLAIMS: \$2,891,387.64**

CLAIM	RECOGNIZED CLAIM	CLAIM	RECOGNIZED CLAIM
DEY65WADHV	\$ 734.40	DW7BCKLJ36	\$ 392.79
DF29UA8KXZ	\$ 784.48	DWA6LDZVXG	\$ 1,621.80
DF39HXRTMW	\$ 304.90	DWEDYUXQVB	\$ 218.89
DF54UGPHNB	\$ 136.16	DWF5HJGSAD	\$ 107.10
DF9USZ8YHG	\$ 677.76	DWFL52H7US	\$ 10,748.91
DFAER6V7PH	\$ 153.00	DWHFR5VXS7	\$ 56.42
DFCUWDJZLA	\$ 206.55	DWMJ3C9AU8	\$ 620.14
DFSB7P9XKW	\$ 917.95	DWP2F5AXCK	\$ 994.50
DFUAGESWVC	\$ 6,537.73	DWRNADYE8M	\$ 378.39
DFZQ4JDSP2	\$ 994.50	DWV8EPFG6H	\$ 19,912.95
DG4Q2PY3T6	\$ 749.70	DX5M938GPC	\$ 1,479.87
DG7WC9S8DQ	\$ 522.14	DX6EZBKU4W	\$ 1,698.30
DGB6STHFM9	\$ 1,789.84	DX6Q3Z5FPR	\$ 462.82
DGDACPY49N	\$ 405.45	DXCNK6HG4T	\$ 2,218.81
DGHP35QBZU	\$ 1,356.45	DXDQ9WZHGN	\$ 627.30
DGQR9U3VMT	\$ 466.65	DXLAYBDRCH	\$ 373.25
DGUZ3VXQ8C	\$ 962.64	DXLUZPHNK2	\$ 544.07
DH5KVVWUX3G	\$ 2,868.75	DXMK8Y7GP9	\$ 329.90
DH6TXRUJYN	\$ 229.50	DXVW7ZT8AH	\$ 431.38
DHT9CDB3NP	\$ 647.04	DY4WNJA6E2	\$ 253.63
DHUNCG2MW8	\$ 2,207.95	DY58TBPLFX	\$ 374.85
DHZSX7BYC6	\$ 618.15	DY8V3U6L2J	\$ 1,286.01
DJ6ZGLMKBA	\$ 379.05	DYM6J7RTUS	\$ 337.64
DJDH4A76EC	\$ 700.21	DZEMJKYX9Q	\$ 1,059.74
DJHKR4A83P	\$ 422.40	DZMBG6C8QY	\$ 406.53
DJRLPENYG9	\$ 765.29	DZW9FKT7V4	\$ 276.01

**EXHIBIT B**  
**ADDITIONAL**  
**REJECTED CLAIMS**



**COGNIZANT SECURITIES LITIGATION  
ADDITIONAL REJECTED CLAIMS**

**TOTAL CLAIMS: 77**

<b>CLAIM</b>	<b>REASON</b>	<b>CLAIM</b>	<b>REASON</b>
D2YLB5HR7K	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DJ4CXR9YUL	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D2YT68L4WJ	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DJDK4C3S5Z	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D3NLYUXMV5	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DJFRPQB7WV	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D4GYMQFVC2	DEFICIENT CLAIM NEVER CURED	DK24YLAEX9	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM
D4PLXGZ5KJ	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DK3S2N8WZ7	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D4S6JC398F	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DKNTVJ64WR	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D5L8XVH3FP	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DKVHTJ4NZG	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D5LNQXM8CE	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DKX2Z4VPYT	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM
D6H2RKW4T3	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DL3WVKUBZ4	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM
D6Z8C93P2R	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DLVN5ETYQM	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D74U3KSXBL	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DMDFZAPBCN	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D7ZGC8VQKR	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DN6HTB9KV4	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D82KAJYP6Q	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DNHVQ38EG7	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM
D85U3YDJLN	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DPF63XG5Q9	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D86ZA4EQTD	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DPLGW3VB62	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D8C97PLTXM	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DPMSGWJ86Z	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D8GBZA9N3Q	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DQE92THYV8	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D983CMSGAR	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DQX6Y3TL9W	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D9N5QSF6AJ	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DR2PUTF683	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
D9XBR3TMCP	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DRUNWV8SPA	DEFICIENT CLAIM NEVER CURED
DA23FKPU79	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DRW7SVYJCM	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DA28UNDGJS	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DS8L7C46M9	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DA86VCW5H3	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DSH4B3QPCZ	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS

## TOTAL CLAIMS: 77

CLAIM	REASON	CLAIM	REASON
DA96XSVQFP	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DT3PDZCKLG	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM
DA9SUQBМК5	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DTRUXM7ENC	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DAFKJCB4QV	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DU84FET3C7	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DAMSLC96G4	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DULD638PJB	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DBSDU3T4X8	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DUYX4GTH5D	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DBVX2K6D8W	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DW4Q35VNPR	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DCJAD4TEPU	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DWLG86J3CX	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DCXHLKU6QV	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DX2U7PLCKF	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DCYVP23Z8B	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DXCP97ZWBG	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DCZM7FHGD2	DEFICIENT CLAIM NEVER CURED	DXDM9A46BG	DEFICIENT CLAIM NEVER CURED
DD4EAPHFMG	DEFICIENT CLAIM NEVER CURED	DXS43YKWNP	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DDBZEN25JU	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DXWK4R8MAU	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DDYJLHGFC7	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DY6PVD9UMT	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DFYUJ32EL9	CLAIM DID NOT RESULT IN A RECOGNIZED CLAIM	DYX93FST5L	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DGBJE5WSYT	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS	DZKSWYQ2GN	CLAIM DID NOT FIT THE DEFINITION OF THE CLASS
DGZSH5TVNC	DEFICIENT CLAIM NEVER CURED		

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE COGNIZANT TECHNOLOGY  
SOLUTIONS CORPORATION  
SECURITIES LITIGATION

Civil Action No. 16-6509 (ES)  
(CLW)

**[PROPOSED] REVISED CLASS DISTRIBUTION ORDER**

Lead Plaintiffs moved this Court for an order approving a distribution plan for the Net Settlement Fund in the above-captioned securities class action (the “Action”). Having reviewed and considered all the materials and arguments submitted in support of the motion, including the Memorandum of Law in Support of Lead Plaintiffs’ Unopposed Motion for Approval of Distribution Plan, the Declaration of Luiggy Segura in Support of Lead Plaintiffs’ Unopposed Motion for Approval of Distribution Plan (“Segura Declaration”), the Memorandum of Law in Support of Lead Plaintiffs’ Motion to Accept Additional Late or Late-Adjusted Claims, and the Supplemental Declaration of Luiggy Segura in Support of Lead Plaintiffs’ Motion to Accept Additional Late or Late-Adjusted Claims (“Supplemental Segura Declaration”),

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Stipulation and Agreement of Settlement dated as of as of September 2, 2021 (ECF No. 165-3)



(“Stipulation”), the Segura Declaration, and the Supplemental Segura Declaration, and all terms used in this Order shall have the same meanings as defined in the Stipulation, the Segura Declaration, and the Supplemental Segura Declaration.

2. This Court has jurisdiction over the subject matter of the Action and over all parties to the Action, including all Settlement Class Members.

3. Lead Plaintiffs’ plan for distribution of the Net Settlement Fund to Authorized Claimants is **APPROVED**. Accordingly:

(a) The administrative determinations of the Court-approved Claims Administrator, JND Legal Administration (“JND”), to accept the Timely Eligible Claims stated in Exhibit D to the Segura Declaration, the Late But Otherwise Eligible Claims stated in Exhibit E to the Segura Declaration, and the eligible Additional Late or Late-Adjusted Claims stated in Exhibit A to the Supplemental Segura Declaration are adopted.

(b) The Claims Administrator’s administrative determinations to reject the Rejected Claims stated in Exhibit F to the Segura Declaration and the ineligible Additional Late or Late-Adjusted Claims stated in Exhibit B to the Supplemental Segura Declaration are adopted.

(c) JND is directed to conduct the Initial Distribution of the Net Settlement Fund after deducting all payments previously allowed, payments approved by this Order, and any estimated taxes, the costs of preparing

appropriate tax returns, and any escrow fees, while maintaining a 5% reserve from the Net Settlement Fund to address any tax liability or claims administration-related contingencies that may arise.

Specifically, as stated in paragraph 45(a) of the Segura Declaration:

(1) JND will calculate award amounts for all Authorized Claimants as if the entire Net Settlement Fund were to be distributed now. JND will calculate each Authorized Claimant's *pro rata* share of the Net Settlement Fund based on the amount of the Authorized Claimant's Recognized Claim in comparison to the total Recognized Claims of all Authorized Claimants; (2) JND will then eliminate from the Initial Distribution any Authorized Claimant whose total *pro rata* share of the Net Settlement Fund is less than \$10.00. These Claimants will not receive any payment from the Net Settlement Fund and will be so notified by JND; (3) After eliminating Claimants who would have received less than \$10.00, JND will recalculate the *pro rata* share of the Net Settlement Fund for Authorized Claimants who would have received \$10.00 or more based on the amount of the Authorized Claimant's Recognized Claim in comparison to the total Recognized Claims of all Authorized Claimants who would have received \$10.00 or more. This *pro rata* share is the Authorized Claimant's "Distribution

Amount”; (4) Authorized Claimants whose Distribution Amount calculates to less than \$200.00 will be paid their full Distribution Amount in the Initial Distribution (“Claims Paid in Full”). These Authorized Claimants will receive no additional funds in subsequent distributions; and (5) 95% of the remaining balance of the Net Settlement Fund will be distributed *pro rata* to Authorized Claimants whose Distribution Amount calculates to \$200.00 or more. The remaining 5% of the Net Settlement Fund will be held in the Reserve to address any tax liability or claims administration-related contingencies that may arise following the Initial Distribution. To the extent the Reserve is not depleted, the remainder will be distributed in the Second Distribution described in subparagraph (f) below.

(d) To encourage Authorized Claimants to cash their checks promptly, all distribution checks will bear the following notation: “CASH PROMPTLY. VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [DATE 90 DAYS AFTER ISSUE DATE].” Lead Counsel and JND are authorized to take appropriate action to locate and contact Authorized Claimants who have not cashed their checks within said time as detailed in paragraph 45(b) of the Segura Declaration.

(e) Authorized Claimants who do not cash their Initial Distribution checks within the time allotted or on the conditions stated in paragraph 45(b) of the Segura Declaration will irrevocably forfeit all recovery from the Settlement, and the funds allocated to these stale-dated checks will be available to be distributed to other Authorized Claimants in the Second Distribution. Similarly, Authorized Claimants who do not cash their distribution checks in the Second Distribution or subsequent distributions, should such distributions occur, within the time allotted or on the conditions stated in paragraph 45(b) of the Segura Declaration will irrevocably forfeit any further recovery from the Net Settlement Fund.

(f) After JND has made reasonable and diligent efforts to have Authorized Claimants cash their Initial Distribution checks (as provided in paragraph 45(b) of the Segura Declaration), but not earlier than seven (7) months after the Initial Distribution, JND will, after consulting with Lead Counsel, conduct the Second Distribution, in which any amount remaining in the Net Settlement Fund, after deducting any unpaid fees and expenses incurred, will be distributed to all Authorized Claimants (other than Claims Paid in Full) who cashed their Initial Distribution checks and are entitled to receive at least \$10.00 from the Second Distribution based on their *pro rata* share of the remaining funds. If any funds remain in the Net Settlement Fund

after the Second Distribution, and if cost-effective, subsequent distributions will take place at six-month intervals.

(g) When Lead Counsel, in consultation with JND, determines that further distribution of the funds remaining in the Net Settlement Fund is not cost-effective, if sufficient funds remain to warrant the processing of Claims received after March 1, 2023, those Claims will be processed, and any otherwise valid Claims received after March 1, 2023, as well as any earlier received Claims for which an upward adjustment was received after March 1, 2023, will be paid in accordance with subparagraph (h) below. If any funds remain in the Net Settlement Fund after payment of these Claims and unpaid fees or expenses, the remaining funds will be contributed to the National Consumer Law Center (“NCLC”).

(h) No new Claims may be accepted after March 1, 2023, and no further adjustments to Claims received on or before March 1, 2023, that would result in an increased Recognized Claim amount may be made for any reason after March 1, 2023, subject to the following exception. If Claims are received or modified after March 1, 2023, that would have been eligible for payment or additional payment under the Court-approved Plan of Allocation if timely received, then, at the time that Lead Counsel, in consultation with JND, determines a distribution is not cost-effective as provided in subparagraph (g)

above, and after payment of any unpaid fees or expenses incurred in connection with administering the Net Settlement Fund and after deducting the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, these Claimants, at the discretion of Lead Counsel and to the extent possible, may be paid their distribution amounts or additional distribution amounts on a *pro rata* basis that would bring them into parity with other Authorized Claimants who have cashed all their prior distribution checks.

4. The Court finds that the administration of the Settlement and the proposed distribution of the Net Settlement Fund comply with the terms of the Stipulation and Plan of Allocation approved by this Court and that all persons involved in the review, verification, calculation, tabulation, or any other aspect of the processing of the Claims submitted, or who are otherwise involved in the administration or taxation of the Settlement Fund or the Net Settlement Fund, are hereby released and discharged from any and all claims arising out of that involvement, and all Settlement Class Members and other Claimants, whether or not they receive payment from the Net Settlement Fund, are hereby barred from making any further claims against the Net Settlement Fund, Lead Plaintiffs, Lead Counsel, the Claims Administrator, the Escrow Agent or any other agent retained by Lead Plaintiffs or Lead Counsel in connection with the administration or taxation of the

Settlement Fund or the Net Settlement Fund, or any other person released under the Settlement beyond the amounts allocated to Authorized Claimants.

5. All of JND's fees and expenses incurred in the administration of the Settlement and estimated to be incurred in connection with the Initial Distribution of the Net Settlement Fund as stated in the invoices attached as Exhibit G to the Segura Declaration are approved, and Lead Counsel is directed to pay the outstanding balance of \$84,891.19 out of the Settlement Fund to JND.

6. Unless otherwise ordered by the Court, JND may destroy the paper copies of the Claims and all supporting documentation one year after the Initial Distribution, and one year after all funds have been distributed may destroy the electronic copies of the same.

7. This Court retains jurisdiction to consider any further applications concerning the administration of the Settlement, and any other and further relief that this Court deems appropriate.

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_ 2023.

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Honorable Esther Salas  
United States District Judge