

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

OKLAHOMA FIREFIGHTERS  
PENSION AND RETIREMENT  
SYSTEM, ET AL.,

Plaintiffs

v.

SIX FLAGS ENTERTAINMENT  
CORPORATION, ET AL.,

Defendants.

Civil Action No. 4:20-cv-00201-P

CLASS ACTION

**SUPPLEMENTAL APPENDIX TO (I) PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION, AND (II) LEAD  
COUNSEL'S MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

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**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA REGARDING:  
(A) MAILING OF THE NOTICE AND CLAIM FORM AND  
(B) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, LUIGGY SEGURA, declare as follows:

1. I am the Vice President of Securities Operations at JND Legal Administration (“JND”). Pursuant to the Court’s September 23, 2024 Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 146) (the “Preliminary Approval Order”), JND was appointed to supervise and administer the notice procedure as well as the processing of claims in connection with the Settlement of the above-captioned action (the “Action”).<sup>1</sup> I submit this Declaration as a supplement to my earlier declaration, the Declaration of Luiggy Segura Regarding: (A) Mailing of the Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received to Date, dated December 20, 2024 (ECF No. 149-2) (the “Initial Mailing

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated September 3, 2024 (ECF No. 145) (the “Stipulation”).

Declaration”). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.

#### **CONTINUED MAILING OF THE NOTICE PACKET**

2. Since the execution of the Initial Mailing Declaration, JND has continued to disseminate copies of the Notice and Claim Form (together, the “Notice Packet”) in response to additional requests from potential Settlement Class Members and nominees. As of the date of this Declaration, JND has mailed a total of 96,753 Notice Packets to potential Settlement Class Members and nominees.

#### **TELEPHONE HELPLINE AND WEBSITE**

3. JND continues to maintain the toll-free telephone helpline (1-877-753-9183) and interactive voice response system to accommodate inquiries from Settlement Class Members. JND also continues to maintain the dedicated website for the Action ([www.SixFlagsSecuritiesLitigation.com](http://www.SixFlagsSecuritiesLitigation.com)) in order to assist Settlement Class Members. On December 26, 2024, JND posted to the website copies of the papers filed in support of Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation and Lead Counsel’s Motion for Attorneys’ Fees and Litigation Expenses. JND will continue to maintain and, as appropriate, update the Settlement website and toll-free telephone helpline until the conclusion of this administration.

#### **REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

4. The Notice informed potential members of the Settlement Class that requests for exclusion from the Settlement Class were to be submitted by mail addressed to *Six Flag Securities Litigation*, EXCLUSIONS, c/o JND Legal Administration, P.O. Box 91074, Seattle, WA 98111,

and must be received no later than January 7, 2025. As of the date of this Declaration, JND has received three (3) requests for exclusion from the Settlement Class, all of which were received before the January 7, 2025 deadline. A list of the names of the persons and entities who requested exclusion from the Settlement Class and their city and state (or foreign county) is attached hereto as Exhibit A.

I declare, under penalty of perjury under the laws of the United States, that the foregoing is true and correct. Executed this 17th day of January, 2025, at New Hyde Park, New York.

  
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LUIGGY SEGURA

**Exhibit A**

1. Malta Pension Investments  
St. Julians, MALTA
2. Robert and Rita Mumaw  
Denton, TX
3. Marcelo Soares de Pinho  
São Paulo, BRAZIL