



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

VLADIMIR FISHEL, derivatively on behalf of SIRIUS XM HOLDINGS INC. and directly on behalf of himself and all other similarly situated stockholders of SIRIUS XM HOLDINGS INC.,

Plaintiff,

v.

LIBERTY MEDIA CORPORATION, GREGORY B. MAFFEI, JAMES E. MEYER, JENNIFER WITZ, EVAN D. MALONE, DAVID A. BLAU, ROBIN P. HICKENLOOPER, MICHAEL RAPINO, DAVID ZASLAV, EDDY W. HARTENSTEIN, JAMES P. HOLDEN, JONELLE PROCOPE, KRISTINA M. SALEN, and CARL E. VOGEL,

Defendants,

- and -

SIRIUS XM HOLDINGS INC.,

Nominal Defendant.

C.A. No. 2021-0820-KSJM

**PLAINTIFF'S UNOPPOSED MOTION
FOR CLASS DISTRIBUTION ORDER**

PLEASE TAKE NOTICE THAT Plaintiff Vladimir Fishel respectfully moves this Court to enter the accompanying Class Distribution Order pursuant to the terms of the Corrected Stipulation and Agreement of Compromise, Settlement, and

Release (the “Stipulation”) (Trans. ID 71800000) and the Court’s Order and Final Judgment (Trans. ID 72701570) and submits in support of this motion the accompanying Affidavit of Jack Ewashko in Support of Plaintiff’s Unopposed Motion for Class Distribution Order (the “Ewashko Affidavit”) submitted by the Court-approved Settlement Administrator, A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”).^{1,2} Plaintiff’s Lead Counsel has shared a copy of this motion with Defendants’ Counsel, and Defendants’ Counsel informed us that Defendants take no position on the motion. If approved by the Court, the Class Distribution Order will, *inter alia*:

1. Direct A.B. Data to distribute 100% of the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payment of A.B. Data’s fees and expenses requested in this motion, and after deducting payment of any estimated taxes, the costs of preparing appropriate tax returns, administrative contingencies, and any escrow fees, as set forth in paragraph 10 of the Ewashko Affidavit (the “Distribution”).

¹ Pursuant to the Court’s Scheduling Order (Trans. ID 71782395), the Court authorized A.B. Data to act as the Settlement Administrator in connection with the Settlement of this Action.

² Plaintiff incorporates by reference the definitions in the Stipulation and the Ewashko Affidavit, and all capitalized terms used herein shall have the same meanings as set forth in the Stipulation and/or the Ewashko Affidavit.

2. Consistent with ¶ 54 of the Court-approved Plan of Allocation stated in the Notice disseminated to Class Members, direct that each Eligible Class Member will be allocated a *pro rata* payment from the Net Settlement Fund equal to the product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the “Per-Share Recovery”, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares held by all Eligible Class Members. (Ewashko Affidavit ¶ 10(a)).

3. Consistent with ¶ 55(i) of the Court-approved Plan of Allocation, with respect to Eligible Shares held of record at the Closing by DTC, through its nominee Cede, A.B. Data shall distribute that portion of the Net Settlement Fund to be allocated to Eligible Beneficial Holders who held their Eligible Shares through DTC Participants to be paid to the DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,³ and subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. (Ewashko Affidavit ¶ 10(b)). The DTC Participants and their respective customers, including any intermediaries, shall then ensure *pro rata* payment to each Eligible Beneficial Holder based on the number of

³ For each DTC Participant, the “Closing Security Position” is the number of Eligible Shares held by such DTC Participant as of the close of trading on January 5, 2024, as reflected on the DTC Allocation Report. *See* Notice n3.

Eligible Shares beneficially owned by such Eligible Beneficial Holder as of the close of trading on January 5, 2024. (*Id.*)

4. Consistent with ¶ 55(ii) of the Court-approved Plan of Allocation, with respect to Eligible Shares held of record as of the close of trading on January 5, 2024, other than by Cede, as nominee for DTC (a “Closing Non-Cede Record Position”), direct A.B. Data to make payment from the Net Settlement Fund directly to the Eligible Record Holder of each Closing Non-Cede Record Position in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Closing Non-Cede Record Position. (Ewashko Affidavit ¶ 10(c)).

5. Consistent with ¶ 55(iii) of the Court-approved Plan of Allocation, direct that an Eligible Beneficial Holder who purchased Eligible Shares but had not settled those Eligible Shares by the close of trading on January 5, 2024 (“Non-Settled Shares”) *shall be* treated as an Eligible Class Member with respect to those Non-Settled Shares, and a person or entity who sold those Non-Settled Shares on or before the close of trading on January 5, 2024 *shall not be* treated as an Eligible Class Member with respect to those Non-Settled Shares.. (Ewashko Affidavit ¶ 10(d)).

6. Consistent with ¶ 55(iv) of the Court-approved Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (*i.e.*, more than six months from the check’s issue date), the DTC Participants or the holder of a Closing Non-Cede

Record Position shall follow their respective policies with respect to further attempted distribution. (Ewashko Affidavit ¶ 10(e)).

7. Consistent with ¶ 56 of the Plan of Allocation, any Class Member that has been informed by the Internal Revenue Service that he, she, or it is subject to backup withholding under the provisions of the Internal Revenue Code must contact the A.B. Data at info@SiriusXMStockholdersLitigation.com to inform A.B. Data that he, she, or it is subject to backup withholding. (Ewashko Affidavit ¶ 10(f)).

8. All undeliverable or uncashed payments returned to A.B. Data by DTC Participants or the holder of a Closing Non-Cede Record Position shall be available for further distribution provided that such distribution is economically feasible. At such time as Plaintiff's Lead Counsel, in consultation with A.B. Data, determines that further distribution of the funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance of the Net Settlement Fund, after payment of any unpaid fees or expenses incurred in connection with administering the Net Settlement Fund and after the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be contributed to the Combined Campaign for Justice. (Ewashko Affidavit ¶ 10(g)).

9. Following the distribution of the Net Settlement Fund to DTC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTC Participants, such as banks or

brokerage firms, through which they beneficially owned Eligible Shares. (Ewashko Affidavit ¶ 10(h)).

10. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all Distribution checks will bear a notation “CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE].” (Ewashko Affidavit ¶ 10(i)).

11. Authorize the destruction of paper copies of all supporting documentation one year after the distribution of the Net Settlement Fund, and the destruction of electronic copies of the same one year of documentation after all funds in the Net Settlement Fund have been distributed. (Ewashko Affidavit ¶ 10(j)).

12. Direct that payment pursuant to the Class Distribution Order shall be final and conclusive against all Eligible Closing Date Stockholders, and release and discharge all Persons involved in the investment, administration, distribution, or taxation of the Settlement Fund or the Net Settlement Fund, from any and all claims arising out of such involvement, and bar all Class Members, whether or not they receive payment from the Net Settlement Fund, from making any further claims against the Net Settlement Fund, Plaintiff, Plaintiff’s Lead Counsel, the Settlement Administrator (A.B. Data), or any other agent retained by Plaintiff or Plaintiff’s Lead Counsel in connection with the investment, administration, distribution, or taxation

of the Settlement Fund or the Net Settlement Fund beyond the amounts allocated to Eligible Closing Date Stockholders.

13. Approve all of A.B. Data’s fees and expenses incurred in connection with the administration of the Settlement and estimated to be incurred in connection with the distribution of the Net Settlement Fund as set forth in Exhibit A to the Ewashko Affidavit and authorize Plaintiff’s Lead Counsel to direct payment out of the Settlement Fund to A.B. Data in payment of any such outstanding fees and expenses.

14. Retain jurisdiction to consider any further applications concerning the administration of the Settlement, and such other and further relief as the Court deems appropriate.

Dated: December 6, 2024

OF COUNSEL:

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Thomas G. James
Eric J. Riedel
Margaret Sanborn-Lowing
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**BERNSTEIN LITOWITZ BERGER
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/s/ Gregory V. Varallo
Gregory V. Varallo (Bar No. 2242)
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Wilmington, DE 19801
(302) 364-3601

Attorneys for Plaintiff

WORDS: 1,347 (of 3,000 Word Limit)

Thomas A. Uebler (Bar No. 5074)
MCCOLLOM D'EMILIO SMITH
UEBLER LLC
2751 Centerville Road, Suite 401
Wilmington, DE 19808
(302) 468-5960

Attorneys for Plaintiff

1. I am a Director of Case Management of A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”), whose Corporate Office is located in Milwaukee, Wisconsin. I am over 21 years of age and am not a party to the above-captioned action (the “Action”).¹ I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. Pursuant to its January 10, 2024, Scheduling Order (Trans. ID 71782395) the Court authorized A.B. Data to act as the Settlement Administrator for the Settlement. As more fully described in the Affidavit of Jack Ewashko Regarding Mailing and Publication of Notice (Trans. ID 72643007), as the Settlement Administrator, A.B. Data has implemented the terms of the Settlement by, among other things: (i) mailing the Notice of Pendency and Proposed Settlement of Stockholder Class and Derivative Action, Settlement Hearing, and Right to Appear (the “Notice”) to potential Eligible Class Members; (ii) causing the publication of the Summary Notice of Pendency and Proposed Settlement of Stockholder Class and Derivative Action, Settlement Hearing, and Right to Appear in *Investor’s Business Daily* and *PR Newswire*; (iii) creating and continuing to maintain a toll-free helpline and a Settlement website to assist potential Eligible Class Members

¹ Unless otherwise defined in this affidavit (the “Affidavit”), all capitalized terms that are not defined in this Affidavit have the meaning ascribed to them in the Corrected Stipulation and Agreement of Settlement, Compromise, and Release, dated January 12, 2024 (the “Corrected Stipulation”) (Trans. ID 71800000).

during the course of the administration; and (iv) administering the Settlement in accordance with the terms of the Stipulation.

3. On April 9, 2024, the Court entered the Order and Final Judgment (the “Final Approval Order”) (Trans. ID 72701570), granting final approval of the Settlement and the proposed plan of allocation of the Net Settlement Fund set forth in the Notice (the “Plan of Allocation”). I submit this Affidavit in support of Plaintiff’s motion for a Class Distribution Order, which will, among other things, approve the proposed plan for the distribution of the Net Settlement Fund to Eligible Class Members in accordance with the terms of the Settlement and the Court-approved Plan of Allocation. *See* Notice ¶ 49. The following statements are based on my personal knowledge and information provided by A.B. Data employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

MERGER RECORDS

4. Pursuant to the terms of the Court-approved Plan of Allocation, the Net Settlement Fund will be distributed to all Eligible Class Members,² *i.e.*, all holders of Sirius XM common stock as of the close of trading on January 5, 2024, whether beneficial or of record, including the legal representatives, heirs, successors-in-

² The Settlement Class is a non-“opt-out” class pursuant to Delaware Court of Chancery Rules 23(a), 23(b)(1), and 23(b)(2). Accordingly, Class Members do not have the right to exclude themselves from the Settlement Class. *See* Notice at page 6.

interest, transferees, and assignees of all such foregoing holders. In accordance with terms of the Stipulation, the Eligible Class Members do not include any of the Excluded Stockholders. *See* Notice ¶ 49.; *see also* Stipulation ¶ 1(cc).

5. Under the terms of the Plan of the Allocation, Eligible Class Members were not required to file a claim form to receive a distribution from the Settlement. Instead, distributions from the Net Settlement Fund will be paid to Eligible Class Members based upon the Merger Records provided to A.B. Data by Plaintiff’s Lead Counsel. *See* Notice ¶ 45.

6. On January 12, 2024, A.B. Data received a copy of the Merger Records identifying all registered holders of Sirius XM common stock who held shares of Sirius XM common stock as of the close of trading on the Settlement Date, *i.e.*, January 5, 2024 (“Registered Holders”). The Merger Records contain the names, addresses, and number of shares held by each of the Registered Holders. The Merger Records identified 6,139 Registered Holders holding a total of 2,213,276,665 (non-Cede) shares of Sirius XM common stock outstanding at the Closing as well as 2,205,832,796 non-Cede Excluded Shares described in paragraph 8 below. A.B. Data identified 7,443,869 non-Cede Eligible Shares (the “Eligible Settlement Date Record Holders”).

7. On January 19, 2024, A.B. Data also received DTC Allocation Reports from Cede & Co. (“Cede”), as nominee for the Depository Trust & Clearing

Company (“DTC”), showing each DTC Participant’s holdings of Sirius XM common stock at the Closing. A.B. Data consulted with DTC to confirm the accuracy of the number of shares identified in the Merger Records. The DTC Allocation Report contains each DTC Participant’s name, identification number, and the number of shares held by the DTC Participant. The DTC Allocation Reports identified 193 DTC Participants holding a total of 1,629,168,500 shares. Accounting for the 1,007,840,774 Cede Excluded Shares described in paragraph 8 below, the total number of Eligible Shares held by the ultimate beneficial owner(s) of any Eligible Shares held of record by Cede (“Eligible Beneficial Holders”) (621,327,726) added to the total number of Eligible Shares held by Eligible Settlement Date Record Holders (7,443,869) yields 628,771,595 total Eligible Shares.

8. Consistent with the terms of the Settlement, Defendants’ Counsel provided A.B. Data with information concerning the stockholdings of the identified Excluded Stockholders. This information indicated a total of 3,213,673,570 Excluded Shares reflected in the Merger Records (2,205,832,796) and DTC Allocation Report (1,007,840,774). The total Excluded Shares include 3,205,832,796 shares shown to be held by Liberty Media Corporation.

SETTLEMENT ADMINISTRATION FEES AND DISBURSEMENTS

9. A.B. Data agreed to be the Settlement Administrator in exchange for payment of its fees and expenses. Plaintiff’s Lead Counsel received regular reports of all the work A.B. Data performed with respect to the administration of the Settlement and authorized the administration work performed herein. Attached hereto as Exhibit A are invoices of A.B. Data’s total fees and expenses for this matter through November 21, 2024, which total \$516,839.25 and A.B. Data’s estimate of fees and expenses to conduct the initial distribution of the Net Settlement Fund in accordance with the “Distribution Plan” described below (\$49,191.59). To date, A.B. Data has not been paid for its fees and expenses. Accordingly, there is an outstanding balance of \$566,030.84 payable to A.B. Data, which amount includes A.B. Data’s anticipated fees and expenses for the initial distribution.

DISTRIBUTION PLAN FOR THE NET SETTLEMENT FUND

10. A.B. Data will distribute 100% of the Net Settlement Fund to Eligible Class Members, after deducting all payments previously allowed and the payments approved by the Court on this motion, and after deducting payment of any estimated taxes, the costs of preparing appropriate tax returns, administrative contingencies, and any escrow fees (the “Distribution”), as follows:

- a. Consistent with ¶ 54 of the Court-approved Plan of Allocation, each Eligible Class Member will be allocated a *pro rata* payment from the

Net Settlement Fund in connection with the Distribution equal to the product of (i) the number of Eligible Shares held by the Eligible Class Member and (ii) the “Per-Share Recovery” for the Settlement, which will be determined by dividing the total amount of the Net Settlement Fund by the total number of Eligible Shares held by all Eligible Class Members. Based upon the total number of identified Eligible Shares and the estimated Net Settlement Fund available for distribution, the estimated Per-Share Recovery is \$0.037 per share.

b. Consistent with ¶ 55 (i) of the Plan of Allocation, with respect to Eligible Shares held of record by the DTC, through its nominee Cede, A.B. Data cause that portion of the Net Settlement Fund to be allocated to Eligible Class Members who held their Eligible Shares through DTC Participants to be paid to the DTC Participants by paying each the Per-Share Recovery times its respective Closing Security Position,³ subject to payment suppression instructions with respect to Excluded Shares and any other shares ineligible for recovery from the Settlement. The DTC Participants and their respective customers, including any intermediaries, shall then ensure *pro rata* payment to each Eligible Beneficial Holder based on the number of Eligible Shares

³ For each DTC Participant, the “Closing Security Position” is the number of Eligible Shares held by such DTC Participant as of the close of trading on January 5, 2024, as reflected on the DTC Allocation Report. *See* Notice n.3.

beneficially owned by such Eligible Beneficial Holder as of the close of trading on January 5, 2024.

c. Consistent with ¶ 55 (ii) of the Plan of Allocation, for Eligible Shares held of record as of the close of trading on January 5, 2024, other than by Cede, as nominee for DTC (a “Closing Non-Cede Record Position”), A.B. Data will make payment from the Net Settlement Fund directly to the Eligible Record Holder of each Closing Non-Cede Record Position in an amount equal to the Per-Share Recovery times the number of Eligible Shares comprising such Closing Non-Cede Record Position.

d. Consistent with ¶ 55(iii) of the Plan of Allocation, for the avoidance of doubt, an Eligible Beneficial Holder who purchased Eligible Shares but had not settled those Eligible Shares by the close of trading on January 5, 2024 (“Non-Settled Shares”) *shall be* treated as an Eligible Class Member with respect to those Non-Settled Shares, and a person or entity who sold those Non-Settled Shares on or before the close of trading on January 5, 2024 *shall not be* treated as an Eligible Class Member with respect to those Non-Settled Shares.

e. Consistent with ¶ 55(iv) of the Plan of Allocation, in the event that any payment from the Net Settlement Fund is undeliverable or in the event a check is not cashed by the stale date (*i.e.*, more than six months from

the check's issue date), the DTC Participants or the holder of a Closing Non-Cede Record Position shall follow their respective policies with respect to further attempted distribution.

f. Consistent with ¶ 56 of the Plan of Allocation, any Class Member that has been informed by the Internal Revenue Service that he, she, or it is subject to backup withholding under the provisions of the Internal Revenue Code must contact the A.B. Data at info@SiriusXMStockholdersLitigation.com to inform A.B. Data that he, she, or it is subject to backup withholding.

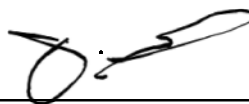
g. All undeliverable or uncashed payments returned to A.B. Data by DTC Participants or the holder of a Closing Non-Cede Record Position shall be available for further distribution provided that such distribution is economically feasible. At such time as Plaintiff's Lead Counsel, in consultation with A.B. Data, determines that further distribution of the funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance of the Net Settlement Fund, after payment of any unpaid fees or expenses incurred in connection with administering the Net Settlement Fund and after the payment of any estimated taxes, the costs of preparing appropriate tax returns, and any escrow fees, will be contributed to the Combined Campaign for Justice.

h. Following the distribution of the Net Settlement Fund to DTC Participants, inquiries by Eligible Class Members regarding payment of the Net Settlement Fund should be made directly to DTC Participants, such as banks or brokerage firms, through which they beneficially owned Eligible Shares.

i. In order to encourage Eligible Class Members to promptly cash their checks, and to avoid or reduce future expenses relating to unpaid checks, all Distribution checks will bear a notation “CASH PROMPTLY, VOID AND SUBJECT TO REDISTRIBUTION IF NOT CASHED BY [6 MONTHS AFTER ISSUE DATE].”

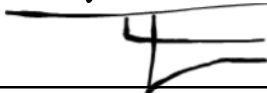
j. Paper copies of all supporting documentation may be destroyed one year after the distribution of the Net Settlement Fund, and electronic copies of the same may be destroyed one year after all funds in the Net Settlement Fund have been distributed.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed this 6th day of December, 2024.



JACK EWASHKO

Sworn to and subscribed before me this 6th day of December, 2024.



Noah T. Fenner



Notarized online using audio-video communication

My commission expires August 29, 2026.



EXHIBIT A

Invoices



SIRIUS XM STOCKHOLDERS LITIGATION

Invoice Date	Invoice Number	Amount
April-24	6505	\$482,324.75
May-24	6538	\$3,222.20
June-24	6780	\$5,155.37
July-24	6880	\$1,939.51
August-24	7028	\$16,365.04
September-24	7197	\$3,160.70
October-24	7301	\$4,671.68
Estimate to Complete (Initial Distribution)		\$49,191.59
Total		\$566,030.84

A.B. DATA, LTD.

Class Action Administration

600 A. B. Data Drive
Milwaukee, WI 53217
414-961-7523
accounting@abdataclassaction.com
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP
1251 AVENUE OF THE AMERICAS, 44TH
FLOOR
NEW YORK, NY, 10020
USA

INVOICE #: INV000306505
INVOICE DATE: 4/30/2024
CLIENT: 107125
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE

JOB 54810 Liberty Media Corporation

DESCRIPTION	QTY	PRICE	AMOUNT
Project/Database Setup (One-Time Fee)	1	5,000.00	\$5,000.00
Remailing to Updated Addresses	877	0.50	\$438.50
Website Setup and Design (One-Time Fee)	1	2,000.00	\$2,000.00
Toll-Free Telephone Line Setup (One-Time Fee)	1	1,250.00	\$1,250.00
Senior Project Management (Hourly)	16.00	225.00	\$3,600.00
Project Management (Hourly)	70.99	185.00	\$13,133.15
System Support (Hourly)	58.83	195.00	\$11,471.85
Quality Assurance (Hourly)	0.13	170.00	\$22.10
Staff (Hourly)	41.76	110.00	\$4,593.60
Broker Fulfillment Processing (Hourly)	16.67	50.00	\$833.50
Printing and Mailing of Bulk Notices for Broadridge	300,000	0.6800	\$204,000.00
Printing and Mailing of 16 Pg Notice	25,000	0.7626	\$19,065.00
Postage	1	16,677.66	\$16,677.66
Website Maintenance/Hosting (Monthly - March/April 2024)	2	200.00	\$400.00
Interactive Voice Response (IVR) (Per Minute)	1,920	0.50	\$960.00
CSRs/Live Operators/Correspondence Processing (Per Hour)	56.77	75.00	\$4,257.75
800 Number Charges (Per Minute)	2,960	0.15	\$444.00
IVR and Line Maintenance (Monthly - March/April 2024)	2	205.00	\$410.00
Advanced Address Updates	4,072	0.50	\$2,036.00
Media Notice - Dow Jones	1	6,912.06	\$6,912.06
Media Notice - PR Newswire	1	4,043.72	\$4,043.72
Bank. Broker, Nominee Fulfillment Expenses	1	177,451.10	\$177,451.10
Receipt, Processing Bank/Broker/Nominee Lists for Mailing	16	185.00	\$2,960.00
Electronic Storage	1	144.76	\$144.76
Market Research	1	100.00	\$100.00
The Depository Trust Company	1	120.00	\$120.00

TOTAL \$482,324.75

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
400 W. Brown Deer Road, Bayside, WI 53217
Routing Number 075000022
Account Number 182377466541 (AB Data, Ltd.)
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

A.B. DATA, LTD.

Class Action Administration
600 A. B. Data Drive
Milwaukee, WI 53217
414-961-7523
accounting@abdataclassaction.com
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP
1251 AVENUE OF THE AMERICAS, 44TH
FLOOR
NEW YORK, NY, 10020
USA

INVOICE #: INV000306538
INVOICE DATE: 5/29/2024
CLIENT: 107125
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE

JOB 54810 Liberty Media Corporation

DESCRIPTION	QTY	PRICE	AMOUNT
Remailing to Updated Addresses	60	0.50	\$30.00
Senior Project Management (Hourly)	8.00	225.00	\$1,800.00
Project Management (Hourly)	0.68	185.00	\$125.80
Website Maintenance/Hosting (Monthly)	1	200.00	\$200.00
Interactive Voice Response (IVR) (Per Minute)	174	0.50	\$87.00
CSRs/Live Operators/Correspondence Processing (Per Hour)	6.22	75.00	\$466.50
800 Number Charges (Per Minute)	363	0.15	\$54.45
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Advanced Address Updates	309	0.50	\$154.50
Bank. Broker, Nominee Fulfillment Expenses	1	25.80	\$25.80
Electronic Storage	1	73.15	\$73.15

TOTAL \$3,222.20

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
400 W. Brown Deer Road, Bayside, WI 53217
Routing Number 075000022
Account Number 182377466541 (AB Data, Ltd.)
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

A.B. DATA, LTD.

Class Action Administration
600 A. B. Data Drive
Milwaukee, WI 53217
414-961-7523
accounting@abdataclassaction.com
abdataclassaction.com



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NEW YORK, NY, 10020
USA

INVOICE #: INV000306780
INVOICE DATE: 7/15/2024
CLIENT: 107125
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE

JOB 54810 Liberty Media Corporation

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	9.00	225.00	\$2,025.00
Project Management (Hourly)	2.48	185.00	\$458.80
Postage	1	0.88	\$0.88
Website Maintenance/Hosting (Monthly)	1	200.00	\$200.00
Interactive Voice Response (IVR) (Per Minute)	180	0.50	\$90.00
CSRs/Live Operators/Correspondence Processing (Per Hour)	6.22	75.00	\$466.50
800 Number Charges (Per Minute)	231	0.15	\$34.65
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Post Office Box Rental/Renewal	1	1,600.00	\$1,600.00
Electronic Storage	1	74.54	\$74.54

TOTAL \$5,155.37

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
400 W. Brown Deer Road, Bayside, WI 53217
Routing Number 075000022
Account Number 182377466541 (AB Data, Ltd.)
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

A.B. DATA, LTD.

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600 A. B. Data Drive
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NEW YORK, NY, 10020
USA

INVOICE #: INV000306880
INVOICE DATE: 8/15/2024
CLIENT: 107125
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE

JOB 54810 Liberty Media Corporation

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	3.00	225.00	\$675.00
Project Management (Hourly)	0.12	185.00	\$22.20
System Support (Hourly)	1.00	195.00	\$195.00
Staff (Hourly)	2.25	110.00	\$247.50
Website Maintenance/Hosting (Monthly)	1	200.00	\$200.00
Interactive Voice Response (IVR) (Per Minute)	107	0.50	\$53.50
CSRs/Live Operators/Correspondence Processing (Per Hour)	3.21	75.00	\$240.75
800 Number Charges (Per Minute)	183	0.15	\$27.45
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Electronic Storage	1	73.11	\$73.11

TOTAL \$1,939.51

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
400 W. Brown Deer Road, Bayside, WI 53217
Routing Number 075000022
Account Number 182377466541 (AB Data, Ltd.)
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

A.B. DATA, LTD.

Class Action Administration

600 A. B. Data Drive
Milwaukee, WI 53217
414-961-7523
accounting@abdataclassaction.com
abdataclassaction.com



BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP
1251 AVENUE OF THE AMERICAS, 44TH
FLOOR
NEW YORK, NY, 10020
USA

INVOICE #: INV000307028
INVOICE DATE: 9/16/2024
CLIENT: 107125
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE

JOB 54810 Liberty Media Corporation

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	6.00	225.00	\$1,350.00
Staff (Hourly)	0.63	110.00	\$69.30
Website Maintenance/Hosting (Monthly)	1	200.00	\$200.00
Interactive Voice Response (IVR) (Per Minute)	128	0.50	\$64.00
CSRs/Live Operators/Correspondence Processing (Per Hour)	5.93	75.00	\$444.75
800 Number Charges (Per Minute)	214	0.15	\$32.10
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Bank. Broker, Nominee Fulfillment Expenses	1	13,924.27	\$13,924.27
Electronic Storage	53	0.02	\$1.06
Web Hosting	1	74.56	\$74.56

TOTAL \$16,365.04

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
400 W. Brown Deer Road, Bayside, WI 53217
Routing Number 075000022
Account Number 182377466541 (AB Data, Ltd.)
Swift Code USBKUS44IMT

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Milwaukee, WI 53217
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NEW YORK, NY, 10020
USA

INVOICE #: INV000307197
INVOICE DATE: 10/15/2024
CLIENT: 107125
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE

JOB 54810 Liberty Media Corporation

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	9.00	225.00	\$2,025.00
Project Management (Hourly)	1.97	185.00	\$364.45
Website Maintenance/Support (Monthly)	1	200.00	\$200.00
Interactive Voice Response (IVR) (Per Minute)	70	0.50	\$35.00
CSRs/Live Operators/Correspondence Processing (Per Hour)	3.11	75.00	\$233.25
800 Number Charges (Per Minute)	150	0.15	\$22.50
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Electronic Storage	53	0.02	\$1.06
Web Hosting	1	74.44	\$74.44

TOTAL \$3,160.70

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
400 W. Brown Deer Road, Bayside, WI 53217
Routing Number 075000022
Account Number 182377466541 (AB Data, Ltd.)
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge

A.B. DATA, LTD.

Class Action Administration

600 A. B. Data Drive
Milwaukee, WI 53217
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NEW YORK, NY, 10020
USA

INVOICE #: INV000307301
INVOICE DATE: 11/15/2024
CLIENT: 107125
PAGE: 1/1
TERMS: 30 days upon receipt

INVOICE

JOB 54810 Liberty Media Corporation

DESCRIPTION	QTY	PRICE	AMOUNT
Senior Project Management (Hourly)	15.00	225.00	\$3,375.00
Project Management (Hourly)	2.19	185.00	\$405.15
Staff (Hourly)	2.08	110.00	\$228.80
Website Maintenance/Support (Monthly)	1	200.00	\$200.00
Interactive Voice Response (IVR) (Per Minute)	69	0.50	\$34.50
CSRs/Live Operators/Correspondence Processing (Per Hour)	1.74	75.00	\$130.50
800 Number Charges (Per Minute)	131	0.15	\$19.65
IVR and Line Maintenance (Monthly)	1	205.00	\$205.00
Electronic Storage	53	0.02	\$1.06
Web Hosting	1	72.02	\$72.02

TOTAL \$4,671.68

MAIL CHECKS TO

PO Box 170062, Milwaukee, WI 53217
Make checks payable to A.B. DATA, LTD.

SEND WIRES TO

US BANK, N.A.
400 W. Brown Deer Road, Bayside, WI 53217
Routing Number 075000022
Account Number 182377466541 (AB Data, Ltd.)
Swift Code USBKUS44IMT

Past due invoices are subject to a 1.5% per month service charge



A.B. Data, Ltd.
Class Action Administration Company
600 A.B. Data Drive
Milwaukee, WI 53217

Date: November 17, 2024
Project: Sirius XM Holdings

Distribution Estimate	Quantity	Rate (\$)	Estimated Cost (\$)
Distribution Fees			
Printing & Mailing Checks	1	1,750.00	1,750.00
Reissuance of Checks to Updated Addresses	3,000	5.00	15,000.00
Check-Processing Fee	6,229	0.66	4,111.14
Postage-Checks	6,229	0.53	3,301.37
Wires	81	50.00	4,050.00
Website and Telephone Support/Charges			
Website Maintenance/Hosting (<i>monthly</i>)	12	175	2,100.00
Interactive Voice Response (IVR) (<i>per minute</i>)	350	0.44	154.00
CSRs/Live Operators (<i>per hour</i>)	10	75	750.00
800 Number Charges (<i>per minute</i>)	1,000	0.15	150.00
IVR and Line Maintenance (<i>monthly</i>)	12	205	2,460.00
Project Management and Reporting			
Project Management (hourly)	15	225	3,375.00
Quality Assurance (hourly)	2	180	360.00
Staff (hourly)	15	110	1,650.00
Miscellaneous Expenses			
DTC Report	1	250.00	250.00
Advanced Address Updates	2,500	3.75	9,375.00
Document Storage (\$1.50 per month)	12	1.50	18.00
Electronic Storage	636	0.53	337.08
Total Estimated Cost			\$ 49,191.59



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

VLADIMIR FISHEL, derivatively on behalf of SIRIUS XM HOLDINGS INC. and directly on behalf of himself and all other similarly situated stockholders of SIRIUS XM HOLDINGS INC.,

Plaintiff,

v.

C.A. No. 2021-0820-KSJM

LIBERTY MEDIA CORPORATION, GREGORY B. MAFFEI, JAMES E. MEYER, JENNIFER WITZ, EVAN D. MALONE, DAVID A. BLAU, ROBIN P. HICKENLOOPER, MICHAEL RAPINO, DAVID ZASLAV, EDDY W. HARTENSTEIN, JAMES P. HOLDEN, JONELLE PROCOPE, KRISTINA M. SALEN, and CARL E. VOGEL,

Defendants,

- and -

SIRIUS XM HOLDINGS INC.,

Nominal Defendant.

[PROPOSED] CLASS DISTRIBUTION ORDER

The Court, having considered Plaintiff's Unopposed Motion for Class Distribution Order (the "Motion"), and for good cause shown, IT IS HEREBY ORDERED that:

1. The Motion is GRANTED.

2. The Settlement Administrator shall implement the proposed Plan of Distribution as described in the Motion.

IT IS SO ORDERED this ____ day of _____, 2024.

Chancellor Kathaleen St. Jude McCormick