

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION

	:	Index No. 151344/2022
In re SEA LIMITED SECURITIES	:	
LITIGATION	:	The Honorable Andrew Borrok
	:	Part 53
This Document Relates To:	:	Motion Sequence No. 8
ALL ACTIONS.	:	SUPPLEMENTAL AFFIRMATION OF
	:	ROSS D. MURRAY REGARDING: (A)
	:	CONTINUED NOTICE DISSEMINATION;
	:	(B) UPDATE ON CALL CENTER
	:	SERVICES AND WEBSITE; AND (C)
	:	REQUESTS FOR EXCLUSION RECEIVED

I, ROSS D. MURRAY, hereby state the following:

1. I am employed as a Vice President of Securities by Verita Global (“Verita”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s April 14, 2025 Order Granting Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement, for Issuance of Notice to the Settlement Class, and for Scheduling of Fairness Hearing (NYSCEF No. 156) (the “Notice Order”), Verita was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned action (the “Action”).¹ I oversaw the notice services that Verita provided in accordance with the Notice Order.

2. I submit this affirmation as a supplement to my previously filed affirmation, the Affirmation of Ross D. Murray Regarding Notice Dissemination, Publication, Establishment of Call Center Services and Website, and Requests for Exclusion Received to Date (NYSCEF No. 165) (the “Initial Mailing Affirmation”). The following statements are based on my personal knowledge and information provided to me by other Verita employees, and, if called as a witness, I could and would testify competently thereto.

CONTINUED DISSEMINATION OF NOTICE

3. As more fully detailed in the Initial Mailing Affirmation, as of July 1, 2025, Verita had mailed or emailed a total of 190,105 copies of the Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for Attorneys’ Fees and Litigation Expenses (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Settlement Class Members and their nominees. *See* Initial Mailing Affirmation, ¶10.

4. Since July 1, 2025, Verita has mailed or emailed an additional 151 Claim Packages in response to requests from potential Settlement Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to

¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation of Settlement dated February 28, 2025 (NYSCEF No. 149) (the “Stipulation”), which is available on the website established for the Settlement at www.SeaOfferingsSettlement.com.

those new addresses.² Therefore, as of July 30, 2025, Verita has mailed or emailed a total of 190,256 Claim Packages to potential Settlement Class Members and nominees. Additionally, Verita received a message from one institution noting that they anticipated sending Claim Packages via email to 164,397 potential Settlement Class Members.

UPDATE ON CALL CENTER SERVICES AND WEBSITE

5. Verita continues to maintain the toll-free telephone number (1-833-867-3776) to accommodate inquiries about the Settlement from potential Settlement Class Members. Verita also monitors the case-dedicated e-mail address, info@SeaOfferingsSettlement.com. Verita endeavors to respond timely to each telephone and e-mail inquiry and will continue to respond to Settlement Class Member inquiries via the toll-free telephone number and case dedicated e-mail address until the conclusion of the administration.

6. Verita also continues to maintain the website dedicated to the Settlement, www.SeaOfferingsSettlement.com (the “Settlement Website”), to assist potential Settlement Class Members. Following Lead Counsel’s filing of its briefing in support of the Settlement on July 8, 2025, Verita posted to the Settlement Website copies of the papers in support of Lead Plaintiff’s Motion for (1) Final Approval of the Settlement and Approval of Plan of Allocation and (2) an Award of Attorneys’ Fees and Expenses and Award to Plaintiffs. Verita will continue operating, maintaining and, as appropriate, updating the Settlement Website until the conclusion of the administration of this Settlement.

REQUESTS FOR EXCLUSION RECEIVED

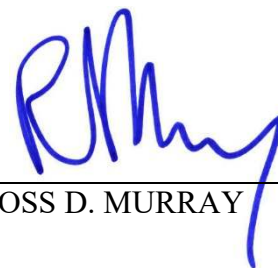
7. Pursuant to the Notice Order, the Notice informed potential Settlement Class Members that written requests for exclusion from the Settlement Class were to be mailed to *Sea Offerings Settlement*, EXCLUSIONS, c/o Verita Global, P.O. Box 5100, Larkspur, CA 94977-5100, such that they are postmarked or received no later than July 7, 2025. At the time of the Initial Mailing Affirmation, Verita reported that it had received one request for exclusion. See Initial Mailing Affirmation, ¶15.

² To date, of the 190,256 mailed Claim Packages, 1,963 were undeliverable. Updated addresses were located, and 124 additional Claim Packages were mailed.

8. Since the Initial Mailing Affirmation was executed, and as of the date of this affirmation, Verita has received one additional late request for exclusion, a redacted version of which is attached hereto as Exhibit A.

9. The Notice requests that objections must be filed with the Court and served on counsel such that they are filed or postmarked on or before July 7, 2025. While Verita is not listed as a recipient of objections, Verita has not received any misdirected objections.

I affirm this 30th day of July, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



ROSS D. MURRAY

PRINTING SPECIFICATIONS STATEMENT

1. Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing memorandum of law was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman
Point Size: 12
Line Spacing: Double

2. The total number of words in the affirmation, inclusive of point headings and footnotes and exclusive of the caption, signature block, and this Certification, is 809 words. By operation of Microsoft Word's word count function, this number includes legal citations, numerical information, and certain forms of punctuation.

DATED: July 31, 2025


ROBBINS GELLER RUDMAN
& DOWD LLP
JOSEPH RUSSELLO

s/ Joseph Russello

JOSEPH RUSSELLO

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
jrussello@rgrdlaw.com

EXHIBIT A

 *SAOF-EXCL80001*
██
██
██
██

RECEIVED
July 14, 2025
Claims Center

Exclusion Cover Page

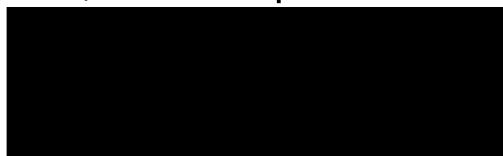
Case Name: Sea Offerings Settlement

Case Code: SAOF

Exclusion Deadline: July 7, 2025 (Postmarked no later than)

Name of Person Filing Exclusion: Frannie P & Stephen Y Stein

Frannie P & Stephen Y Stein



Sea Offerings Settlement Exclusions
C/O Verita Global
P.O. Box 5100
Larkspur, CA 94977-5100

July, 7, 2025

Gentlemen,

We request exclusion from settlement class In re Sea Limited Securities litigation, Index number 151344/2022.

In light of the fact that the broker who sold me 10 shares is no longer working and we haven't had an account at his brokerage firm in three years, the only information we can provide is that we sold 10 shares on March 29, 2022 at \$1.2544 per share.

Thank you for your attention to this matter.

Respectfully,

Handwritten signature of Frannie P. Stein in cursive script.

Frannie P Stein

Handwritten signature of Stephen Y Stein in cursive script.

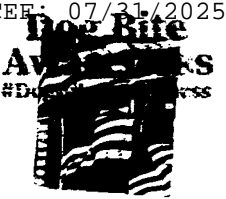
Stephen Y Stein

NYSCEF DOC. NO. 191

RECEIVED NYSCEF: 07/31/2025

STEIN

9 JUL 2025 PM 1 L



RECEIVED
JUL 14 2025

BY:

SEA OFFERINGS SETTLEMENT EXCLUSION
C/O VERITA GLOBAL
P.O. BOX 5100
LARKSPUR, CA 94977-5100

94977-510000

