

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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<i>In re</i>	:	Chapter 11
	:	
THE McCLATCHY COMPANY, <i>et al.</i> ,	:	Case No. 20-10418 (MEW)
	:	
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	
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SUPPLEMENTAL DECLARATION  
OF EVAN GERSHBEIN REGARDING RETENTION OF  
KURTZMAN CARSON CONSULTANTS LLC AS ADMINISTRATIVE  
ADVISOR TO THE DEBTORS *NUNC PRO TUNC* TO THE PETITION DATE

I, Evan Gershbein, being duly sworn, state the following under penalty of perjury:

1. I am an Executive Vice President of Corporate Restructuring Services for Kurtzman Carson Consultants LLC (“KCC”),<sup>2</sup> whose offices are located at 222 N. Pacific Coast Highway, 3<sup>rd</sup> Floor, El Segundo, California 90245. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. This declaration (this “**Supplemental Declaration**”) supplements the *Declaration of Evan Gershbein in Support of Debtors’ Application for an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor to the Debtors Nunc Pro Tunc to the Petition Date*, dated February 24, 2020 (the “**Original**

<sup>1</sup> The last four digits of Debtor The McClatchy Company’s tax identification number are 0478. Due to the large number of debtor entities in these jointly administered chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <http://www.kccllc.net/McClatchy>. The location of the Debtors’ service address for purposes of these chapter 11 cases is: 2100 Q Street, Sacramento, California 95816.

<sup>2</sup> Capitalized terms used and not otherwise defined herein shall have the meaning ascribed to them in the Application (as hereinafter defined).



**Declaration**”)<sup>3</sup> which is annexed as Exhibit B to the *Debtors’ Application for an Order Authorizing Employment and Retention of Kurtzman Carson Consultants LLC as Administrative Advisor to the Debtors Nunc Pro Tunc to the Petition Date* [Docket No. 95] (the “**Application**”).

3. KCC is submitting this Supplemental Declaration to disclose a new relationship with The McClatchy Company Retirement Plan (the “**Pension Plan**”), a company-sponsored noncontributory defined benefit pension plan covered by the Pension Benefit Guaranty Corporation (“**PBGC**”).

4. PBGC is a wholly-owned United States government corporation, and an agency of the United States, that administers the defined benefit pension plan termination insurance program under Title IV of the Employee Retirement Income Security Act of 1974, *as amended*, 29 U.S.C. §§ 1301-1461 (2018).

5. PBGC terminated the Pension Plan as of August 31, 2020 and trustee the Pension Plan effective as of September 4, 2020. The full transition (the “**Transition**”) of administration of the Pension Plan to PBGC is expected to take at least 6 months.

6. The Debtors expect that PBGC will file claims against the Debtors on account of termination of the Pension Plan, and that those claims will be treated as general unsecured claims in these cases.

7. As part of the transition, on or about September 4, 2020, KCC has been hired by the Pension Plan to field pensioners’ calls and respond to inquiries from those callers, which is a service that KCC performed for the Debtors prior to PBGC becoming trustee of the Pension Plan.

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<sup>3</sup> On March 17, 2020, KCC filed a supplemental declaration [Docket No. 195] in support of the Application.

8. If KCC discovers any further connections with any interested party or enters into any new relationship with any interested party, KCC will promptly supplement its disclosure to the Court.

9. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: September 11, 2020

/s/ Evan Gershbein

Evan Gershbein  
Executive Vice President  
Kurtzman Carson Consultants LLC  
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