

Exhibit D

Claim 10621

PART I - CLAIMANT INFORMATION

The Claims Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Claims Administrator in writing at the address above. Complete names of all persons and entities must be provided.

Beneficial Owner's Name

First Name

MARTIN

MI

Last Name

WOODWARD

Joint Beneficial Owner's Name (if applicable)

First Name

MI

Last Name

If this claim is submitted for an IRA, and if you would like any check that you MAY be eligible to receive made payable to the IRA, please include "IRA" in the "Last Name" box above (e.g., Jones IRA).

Entity Name (if the Beneficial Owner is not an individual)

Name of Representative, if applicable (executor, administrator, trustee, c/o, etc.), if different from Beneficial Owner

Last 4 digits of Social Security Number or Taxpayer Identification Number

[REDACTED]

Street Address

[REDACTED]

Telephone Number (Day)

- -

Telephone Number (Evening)

- -

Email Address (email address is not required, but if you provide it you authorize the Claims Administrator to use it in providing you with

[REDACTED]

Type of Beneficial Owner:

Specify one of the following:

Individual(s)

Corporation

UGMA Custodian

IRA/401K

Partnership

Estate

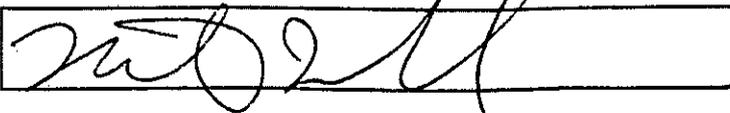
Trust

Other (describe: YOU)

DON'T KNOW - I AM RELYING ON YOU TO GET ME THE MONEY I AM OWED

¹ If the account number is unknown, you may leave blank. If filing for more than one account for the same legal entity you may write "multiple." Please see Paragraph 9 of the General Instructions below for more information on when to file separate Claim Forms for multiple accounts.

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature of Claimant 

Date - -
MM DD YY

Print Claimant name here MARTIN WOODWARD

Signature of joint Claimant, if any 

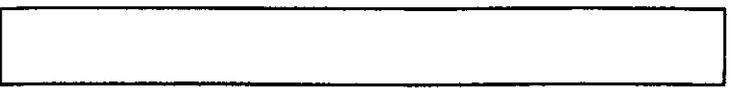
Date - -
MM DD YY

Print joint Claimant name here 

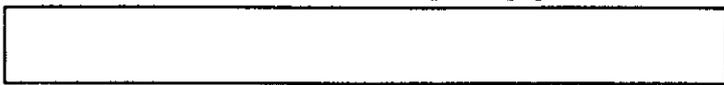
If the Claimant is other than an individual, or is not the person completing this form, the following also must be provided:

Signature of person signing on behalf of Claimant 

Date - -
MM DD YY

Print name of person signing on behalf of Claimant here 

Capacity of person signing on behalf of Claimant, if other than an individual, e.g., executor, president, trustee, custodian, etc. (Must provide evidence of authority to act on behalf of Claimant - see ¶ 10 on page 7 of this Claim Form.)



WHAT A TERRIBLE CLAIM FORM. WHO KEEPS THESE KINDS OF RECORDS? I HAVE A BROKERAGE ACCOUNT THROUGH WELLS FARGO WITH AT LEAST SEVEN DIFFERENT TYPES OF ACCOUNTS. I WASNT GOING TO ANNOY MY BROKER WITH THIS, I DOUBT SHE COULD FIGURE IT ALL OUT ANYHOW. JUST GET ME THE MONEY I AM OWED (OR WE, IF IT IS INVOLVING ONE OF THE JOINT ACCOUNTS WITH MY WIFE, LAURA WOODWARD). AND DO A BETTER JOB NEXT TIME WITH YOUR CLAIM FORM!

Divider Sheet

SCANA Securities Litigation
c/o Epiq
P.O. Box 4850
Portland, OR 97208-4850

Website: www.SCANASecuritiesLitigation.com
Email: info@SCANASecuritiesLitigation.com
Phone: 1-833-947-1420



4893001656119
000 0004826 00000000 0001 0001 04826 INS: 0 0

MARTIN WOODWARD
[REDACTED]

Claim Number: 10621

Response Deadline: September 24, 2020

September 4, 2020

Notice of Deficient Proof of Claim Submission

Dear Claimant:

We received your Proof of Claim and Release Form (“Claim”) that you submitted in connection with the Settlement obtained in the securities class action *In re SCANA Corporation Securities Litigation*. We have determined, based on our review of your Claim, that the Claim is deficient or ineligible for the reason(s) identified below.

Ineligibility Condition: No Class Period purchases/acquisitions of publicly traded SCANA common stock (No Eligible Transactions).

The Claim referenced above did not contain any purchases or eligible acquisitions of publicly traded SCANA common stock during the Class Period (i.e., October 27, 2015 through December 20, 2017, inclusive). Unless you had Eligible Transactions during the Class Period that are not reflected in your Claim, this is NOT a curable deficiency.

How to Resolve: You can resolve this condition of ineligibility only by submitting documentation supporting purchases and/or eligible acquisitions of publicly traded SCANA common stock during the Class Period that were not previously reflected in your Claim. Acceptable supporting documentation includes securities brokers’ confirmation slips, month- and year-end account statements, or similar documentation. Self-generated documents are not acceptable.

PLEASE NOTE: Curing this condition of ineligibility is an absolute requirement in order for your Claim to be eligible to participate in the Settlement. If you have other deficiencies and cure them, your Claim still will not be eligible unless this deficiency is also cured.

In order to resolve the deficiencies within your Claim, you must submit a written response with any required documentation as specified, postmarked no later than the response deadline printed at the top of this notice. Please include a copy of this notice with your response. **If you fail to respond by the response deadline set forth above, or if your response fails to cure the condition(s) identified below, this Claim will be rejected to the extent that those conditions remain uncured. This is the only notice you will receive with respect to this Claim.**

The Plan of Allocation for the net proceeds of the Settlement, which has been approved by the Court and which is referred to in many of the conditions of deficiency, is set forth in the Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys’ Fees and Litigation Expenses (the “Notice”). The Notice can be viewed on or downloaded from www.SCANASecuritiesLitigation.com.



Please be advised that even if you cure the noted deficiency(ies), your Claim must then calculate to a Recognized Claim under the Plan of Allocation in order to be included in the list of eligible claims presented to the Court for approval. If you disagree with the condition(s) identified in this notice, you may contact us for assistance and/or request Court review of our administrative determination regarding your Claim.

To request Court review of your Claim, you must send a letter to the Claims Administrator postmarked no later than the response deadline set forth above. Your letter must: (1) include a copy of this notice; (2) specifically state that you request Court review of the full or partial rejection of the Claim; (3) state your argument(s) for why you are contesting the full or partial rejection of the Claim; and (4) include any and all documentation supporting your argument(s).

PLEASE NOTE: COURT REVIEW SHOULD ONLY BE SOUGHT IF YOU DISAGREE WITH THE CLAIMS ADMINISTRATOR'S DETERMINATION REGARDING YOUR CLAIM. IF YOU REQUEST COURT REVIEW, YOUR CLAIM AND THE CLAIM'S SUPPORTING DOCUMENTATION WILL BE SUBMITTED TO THE COURT FOR CONSIDERATION AND WILL BECOME PART OF THE PUBLIC RECORD. ALL PERSONAL INFORMATION PROVIDED ON YOUR CLAIM FORM AND THE SUPPORTING DOCUMENTATION WILL BE REDACTED TO PROTECT YOUR PRIVACY.

If you have any questions about this notice or if you want to confirm the status of your Claim after you submit a response to this notice, please contact us at the toll-free number or email address noted above.

Sincerely,
Claims Administrator

Divider Sheet

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MARTIN WOODWARD

Claim Number: 10621

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If you have any questions about this notice or if you want to confirm the status of your Claim after you submit a response to this notice, please contact us at the toll-free number or email address noted above.

Sincerely,
Claims Administrator

MARTIN WOODWARD

September 24, 2020

Claims Administrator
SCANA Securities Litigation
c/o Epiq
P.O. Box 4850
Portland, OR 97208-4850

Dear Claims Administrator:

I am writing to request Court review of my claim (Claim Number 10621). Enclosed is a copy of the letter I received from you, as you requested.

I am asking for Court review because I believe you have wrongfully rejected my claim, for the reasons below.

It is clear that I am a member of the settlement class. You would not have sent me any notification if I wasn't. That means you have access to records showing that I was affected negatively in connection with my ownership of SCANA securities.

As I told you, I don't have the records you have. If I did, I would have gladly sent them to you, but I don't. All of my investments in securities are through funds held in brokerage accounts, and many of these accounts are jointly owned by my wife (Laura Heather Woodward) and me. Some are college savings accounts for my children, Cullen, Josie, and Adeline. There are at least eight accounts in total, most through Wells Fargo. I tried to figure out which of these held SCANA securities so that I could give you the documentation you asked for, even though you obviously already have it. But, not surprisingly, I couldn't figure it out. There are hundreds and hundreds of securities in all these funds.

Then I realized the unfairness in what you are asking of me. You probably got claims from some large institutional investors who have easy access to the documentation, because they routinely buy and sell individual securities like SCANA. But for small individual investors like me,

the claim form is nothing but a deterrent. How and when am I—a lone consumer whose only investments in equities are through mutual funds—supposed to gather up information about the timing of trades in an individual security that I neither track nor have ready access to?

I suspect you know this. I also think that is why you used such an onerous claim form. I don't know how many claims you received from individual investors, but I bet the answer is "only from an extremely small percentage of eligible claimants." That means the wrongdoers are not having to reimburse most investors like me—and I am confident that is only because the claim form imposed ridiculous requirements we could not readily meet. (I bet a lot of folks took one look at that claim form, thought "I'll never be able to fill this out properly," and pitched it in the trash.)

Well, that is unjust. I am certain it would take you little time if any to simply calculate the amount I am owed under the settlement using records you already have. But instead, you are asking me to somehow dig up this very same documentation you know I do not have and cannot get, and you are telling me that if I don't, I will not receive any payment from the settlement fund.

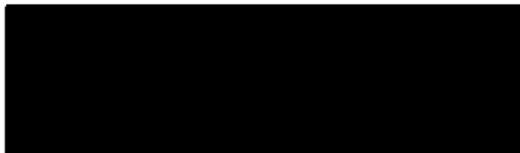
I object! I have properly claimed my share of the settlement proceeds. You know from the records you already have exactly what that share is, and you should give it to me without further delay. If you won't, kindly present this letter to the Court. I just cannot imagine that any court in the land would condone what you are doing if the judge realized what is happening to me and to other individual investors in mutual funds that happened to include SCANA securities among hundreds and hundreds of others. Therefore, if you won't remit what I am owed, I request the chance to make my case directly to the Court.

Sincerely,

A handwritten signature in black ink, appearing to read "M Woodward", written in a cursive style.

Martin Woodward

MARTIN WOODWARD



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

24 SEP 2020



1000

97208

U.S. POSTAGE PAID
FCM LETTER

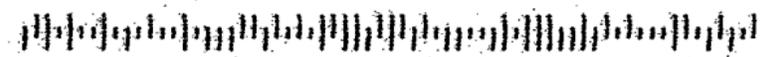
SEP 24, 20
AMOUNT

\$0.55

R2305M148657-40

SCANA Securities Litigation
c/o Epiq
P.O. Box 4850
Portland, OR 97208-4850

Attn: Claims Administrator



Divider Sheet

From: [Sullivan, Owen](#)
To: [Martin Woodward](#)
Subject: RE: SCANA Securities Litigation - Claim 10621 Court Review Follow-Up
Date: Thursday, February 18, 2021 6:26:00 PM

Dear Marty,

We will include all of the correspondence received to date in your request for Court Review when it is prepared to be presented to the Court. If there is any additional information that I can provide, please let me know.

Sincerely,

Owen Sullivan
Epiq | Project Manager
Phone: +1 503 350 4230
Mobile: +1 503 267 7581

Email: osullivan@epiqglobal.com

From: Martin Woodward [REDACTED]
Sent: Thursday, February 18, 2021 5:46 PM
To: Sullivan, Owen <osullivan@epiqglobal.com>
Subject: Re: SCANA Securities Litigation - Claim 10621 Court Review Follow-Up

I want Court review, please. I dispute how you processed my claim. Please make sure the Court sees all my correspondence.

Thanks.

Marty

On Feb 18, 2021, at 7:29 PM, Sullivan, Owen <osullivan@epiqglobal.com> wrote:

Dear Mr. Woodward,

Thank you for your e-mail. As the Claims Administrator, we are unable to deviate from the Court approved methodology for determining eligibility or payment amounts. We do not have access to a complete list of transactions that took place for all investors in SCANA. Rather, the process for identifying potential Class Members for this matter involved requiring that brokers and other nominees who purchased or otherwise acquired publicly traded SCANA common stock during the Class Period either provide the name and address of the beneficial owners in order to be sent a packet, or request the packets to then be sent by the broker or nominee themselves to the beneficial owner. Once the claim packages have been sent to potential Class Members, we are then reliant on the documented transactional information provided on Claim Forms to the Claims Administrator to be processed according to the Court Approved Plan of Allocation beginning on page 11 of the attached Notice.

This states:

“Based on the formula stated below, a “Recognized Loss Amount” or “Recognized Gain Amount” will be calculated for each purchase or acquisition of publicly traded SCANA common stock during the Class Period that **is listed on the Claim Form and for which adequate documentation is provided.**”

Based on your correspondence it appears that your concerns regarding this matter are rooted in this requirement to provide transactional information and not with how your actual claim was processed. The Court Review process is meant to provide an opportunity for disagreements regarding how a claim was processed based on the Court-approved Plan of Allocation. The Notice provided instructions for objecting to the Settlement or any of the Terms of the Settlement, however the deadline to object passed on May 27, 2020 before your letter was received.

Once you have had an opportunity to review this information, I am available to discuss any additional concerns regarding the processing of your Claim. Otherwise, can you please let me know if your letter was sent solely disagreeing with the requirements originally set up by the Court to require this information?

Sincerely,

Owen Sullivan
Epiq | Project Manager
Phone: +1 503 350 4230
Mobile: +1 503 267 7581

Email: osullivan@epiqglobal.com

From: Martin Woodward [REDACTED]
Sent: Thursday, February 18, 2021 4:32 PM
To: Sullivan, Owen <osullivan@epiqglobal.com>
Subject: Re: SCANA Securities Litigation - Claim 10621 Court Review Follow-Up

CAUTION: This email originated from outside of Epiq. Do not click links or open attachments unless you recognize the sender and know the content is safe. Report phishing by using the phish alert button or forward to phishing@epiqglobal.com.

You denied my claim. I have no idea why. I told you I don't have the records your claim form demanded, and I can't get them. I sure hope you didn't deny the claim just because of that. (I suspect many people who could have made claims didn't bother because of the burdensome claim form.)

Anyhow, you and the defendants have records I don't, and those same records show whether I'm entitled to receive anything from the settlement (and, if so, how much)- or whether I'm not entitled to receive anything (which begs the question why I was

included in the class in first place).

So how about you just email me the records? Let me see them. Then we can talk.

Thanks.

Marty

On Feb 18, 2021, at 6:08 PM, Sullivan, Owen <osullivan@epiqglobal.com> wrote:

Hello Mr. Woodward,

My name is Owen Sullivan. I am the Project Manager for the SCANA Securities Litigation. We received your request for Court Review for Claim 10621 would like to discuss it further. Our team has been trying to contact you at the [REDACTED] number included in your request, however have been unsuccessful at this time. As we are preparing to finalize claim determinations in this matter, I would like to ensure that your request has been correctly handled. Please respond letting me know what you would be available to review this information, or feel free to contact me directly using my numbers below.

Very Truly Yours,

Owen Sullivan
Project Manager
Epiq | Class Action & Mass Tort Solutions
10300 SW Allen Blvd.
Beaverton, Oregon 97005
Phone: +1 503 350 4230
Mobile: +1 503 267 7581
Email: osullivan@epiqglobal.com

People. Partnership. Performance.
www.epiqglobal.com

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<SCANA - Settlement Notice.pdf>