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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, AND SYLEBRA CAPITAL MENLO MASTER FUND, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON et al.,

Defendants.

Case No. 2:22-cv-02249-FWS-RAO

CLASS ACTION

DECLARATION OF MICHAEL H. ROGERS IN SUPPORT OF (I) MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION AND (II) MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

Hearing Date: December 17, 2026
Time: 10:00 a.m.
Courtroom: 10D
Judge: Honorable Fred W. Slaughter

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I, Michael H. Rogers, declare under penalty of perjury, pursuant to 28 U.S.C. §1746:

1. I am a member of the law firm of Labaton Keller Sucharow LLP ("Labaton" or "Lead Counsel"), which serves as court-appointed Lead Counsel for Lead Plaintiffs Sylebra Capital Partners Master Fund Ltd., Sylebra Capital Parc Master Fund, and Sylebra Capital Menlo Master Fund ("Lead Plaintiffs" or "Sylebra Funds"), and all other members of the proposed Settlement Class in the above-captioned litigation (the "Action").[1] I am admitted to practice before this Court *pro hac vice* and have been actively involved throughout the prosecution and resolution of the Action, am familiar with the proceedings, and have personal knowledge of the matters set forth herein based upon my close supervision of and participation in the Action.

2. I respectfully submit this Declaration in support of Lead Plaintiffs' motion, pursuant to Rule 23(e)(2) of the Federal Rules of Civil Procedure, for final approval of the proposed class action settlement with Everbridge, Inc. ("Everbridge"), David Meredith, and Patrick Brickley (collectively, "Defendants"), for $85,000,000 in cash.

3. If approved, the Settlement will resolve all claims in the Action, and related Released Plaintiffs' Claims, on behalf of the Settlement Class, which consists of all persons and entities that purchased or otherwise acquired the publicly traded common stock of Everbridge during the period from February 18, 2020 through February 24, 2022, both dates inclusive, and were allegedly damaged thereby.[2] The

[1] All capitalized terms herein that are not otherwise defined have the same meanings as provided in the Stipulation and Agreement of Settlement, dated August 10, 2026 (the "Stipulation"). ECF No. 188-3.

[2] Excluded from the Settlement Class are: (i) Defendants; (ii) members of the immediate family of any Defendant who is an individual; (iii) any person who was an officer, director, or control person of Everbridge during the Class Period; (iv) any firm, trust, corporation, or other entity in which any Defendant has or had a controlling or beneficial interest; (v) Everbridge's employee retirement and benefit plan(s) and their participants or beneficiaries, to the extent they made purchases through such plan(s); and (vi) the legal representatives, affiliates, heirs, successors-in-interest, or assigns of any such excluded Person. Also excluded from the Settlement Class are persons and

(Footnote continued on next page)

Court preliminarily approved the Settlement and directed notice to the Settlement Class by Order entered August 31, 2026 ("Preliminary Approval Order"). ECF No. 190.

4. I also respectfully submit this Declaration in support of: (i) approval of the proposed plan for allocating the net proceeds of the Settlement to eligible Settlement Class Members ("Plan of Allocation"); and (ii) Lead Counsel's motion, on behalf of Plaintiffs' Counsel, for an award of attorneys' fees of 25% of the Settlement Amount, net of awarded Litigation Expenses and administration costs incurred to date, plus accrued interest; payment of litigation expenses incurred by Plaintiffs' Counsel in the total amount of $454,026.11, plus accrued interest; and, in accordance with the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4(a)(4), reimbursement of $32,535.32, in the aggregate, to Lead Plaintiffs and additional proposed class representative Central Laborers' Pension Fund ("Central Laborers") (the "Fee and Expense Application").

5. For the reasons discussed below and in the accompanying memoranda of law,[3] I respectfully submit that: (i) the terms of the Settlement are fair, reasonable, and adequate in all respects and should be approved by the Court; (ii) the proposed Plan of Allocation is fair, reasonable, adequate, and should be approved by the Court; and (iii) the Fee and Expense Application is fair, reasonable, supported by the facts and the law, and should be granted in all respects. Moreover, the Settlement, Plan of Allocation, and Fee and Expense Application have the full support of Lead Plaintiffs—sophisticated investors that have actively supervised the Action since its inception. *See* Declaration

entities who or which submit a request for exclusion from the Settlement Class that is accepted by the Court.

[3] In conjunction with this Declaration, Lead Plaintiffs and Lead Counsel are submitting the Memorandum of Points and Authorities in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation ("Settlement Memorandum") and the Memorandum of Points and Authorities in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses ("Fee and Expense Memorandum").

of Daniel Gibson on behalf of Sylebra Funds, dated November 6, 2026, attached hereto as Exhibit 1.[4]

I. PRELIMINARY STATEMENT

6. The proposed Settlement now before the Court provides for the full resolution of the Action, and related Released Plaintiffs' Claims, in exchange for a cash payment of $85,000,000. As detailed herein, Lead Plaintiffs and Lead Counsel respectfully submit that the Settlement represents a very favorable result for the Settlement Class, particularly in light of the significant risks of continuing to litigate the Action.

7. In choosing to settle, Lead Plaintiffs and Lead Counsel took into consideration the substantial challenges associated with advancing the claims through trial, as well as the duration and complexity of the legal proceedings that remained ahead. As discussed in detail below, had the Settlement not been reached, there were considerable barriers to a greater recovery, or any recovery at all. The decision to settle was informed by a comprehensive investigation into the claims and defenses in the Action, substantive motion practice and discovery, and vigorous arm's-length negotiations, based upon adequate information after consultation with experienced legal counsel.

8. The case—which was litigated efficiently and aggressively until the agreement to settle—was resolved only after Lead Plaintiffs, among other things: (i) conducted an extensive investigation of the claims at issue, including contacting and interviewing former employees of Everbridge; (ii) prepared and filed detailed complaints; (iii) litigated two motions to dismiss; (iv) successfully revived certain claims dismissed by the Court in its order granting Defendants' motion to dismiss the Second Amended Complaint; (v) sought and obtained document discovery; (vi) moved

[4] All exhibits to the Motions are annexed hereto. For clarity, citations to exhibits that themselves have attached exhibits will be referenced as "Ex. ___ - ___." The first numerical reference is to the designation of the entire exhibit attached hereto and the second alphabetical reference is to the exhibit designation within the exhibit itself.

for class certification; (vii) obtained and analyzed more than 207,100 documents (1,083,000 pages) produced by Defendants and third parties; (viii) produced documents and deposition witnesses in response to discovery propounded by Defendants, including documents and witnesses related to Central Laborers; (ix) engaged experts in post-acquisition accounting, damages, market efficiency, and loss causation; and (x) participated in a mediation session and follow-up negotiations.

9. The Settlement is above industry trends. It is more than four times greater than the median reported recovery in securities class actions settled in the first half of 2026, which was $20 million. *See* Laarni T. Bulan and Eric Tam, *Securities Class Action Settlements – 2026 Midyear Assessment* (Cornerstone Research 2026), Ex. 2, at 1.

10. As discussed below, according to Lead Plaintiffs' damages expert, maximum estimated damages could have been between approximately $1.38 billion and $1.76 billion, of which the Settlement recovers a range of approximately 4.8% to 6.2%. However, this estimate assumes that Defendants would not be successful in challenging the alleged statements and related alleged corrective disclosures at class certification (and later at summary judgment). For instance, Defendants argued that the first two alleged misstatements about the integration of NC4, Connexient, CNL, and One2Many had no impact on the price of Everbridge's common stock. Had Defendants prevailed in this argument, the Class Period would be shortened to start with the xMatters statement on April 6, 2021—and damages would be reduced by more than 50%, to between approximately $648 million and $860 million. In this scenario, the Settlement recovers a range of approximately 9.9% to 13.1% of estimated damages. If disaggregation of non-fraud related information is factored in, Lead Plaintiffs' estimated damages in this scenario would be reduced further, to between approximately $587 million and $752 million, depending on the trading model and assumptions used, representing a recovery of approximately 11.3% to 14.5% of estimated damages.

11. Additionally, Defendants would have likely argued that the alleged corrective disclosures on December 9, 2021 and February 24, 2022 did not correct any of the alleged misstatements, significantly impacting potential damages. For example, at summary judgment or trial, if Defendants were successful in challenging the December 2021 disclosure, and the Class Period was limited to just the final alleged corrective disclosure, estimated damages for the full Class Period would decrease to approximately $154 million to $184 million, and damages for a shorter class period beginning on April 6, 2021 would be approximately $102 million to $129 million. In these scenarios, the Settlement recovers a range of approximately 46.2% to 55.2% for the full Class Period and 65.9% to 83.3% for a class period beginning on April 6, 2021.

12. In addition to seeking approval of the Settlement, Lead Plaintiffs seek approval of the proposed Plan of Allocation governing the calculation of claims and the distribution of the Settlement proceeds. As discussed below, the proposed Plan of Allocation was developed with the assistance of Lead Plaintiffs' damages expert and provides for the distribution of the Net Settlement Fund to Settlement Class Members who submit Claim Forms that are approved for payment on a *pro rata* basis based on their losses attributable to the alleged fraud.

13. With respect to Lead Counsel's request for an award of attorneys' fees and payment of expenses on behalf of itself and Plaintiffs' Counsel, including Liaison Counsel Robbins Geller Rudman & Dowd LLP ("Robbins Geller"),[5] the requested fee of 25% would be fair both to the Settlement Class and counsel, and warrants the Court's approval. The fee request is the Ninth Circuit 25% benchmark, within the range of fee percentages frequently awarded in connection with similar settlements, and, under the facts of this case, justified considering the benefits that Lead Counsel conferred on the Settlement Class, the risks it undertook, the quality of the representation, the burdens

[5] In the Preliminary Approval Order (explained below), the Court appointed Labaton and Robbins Geller as "Co-Class Counsel for settlement purposes." ECF No. 190 at 21.

and obstacles overcome, and the fact that Lead Counsel pursued the case at its own financial risk.

14. Lead Counsel also seeks expenses in the amount of $454,026.11, plus reimbursement to Lead Plaintiffs and proposed additional class representative Central Laborers, pursuant to the PSLRA, for their efforts on behalf of the Settlement Class in the aggregate amount of $32,535.32. *See* Ex. 1, ¶¶10-12; Declaration of Kenton W. Day on behalf of Central Laborers, dated November 10, 2026, attached hereto as Exhibit 3. The expense amounts are less than the maximum amount of expenses of $675,000 provided for in the notices.

15. Lead Counsel has worked with the Court-authorized Claims Administrator, Verita Global, LLC ("Verita" or "Claims Administrator"), to disseminate notice of the Settlement to Settlement Class Members as directed in the Preliminary Approval Order. In this regard, Verita has disseminated 84,394 Postcard Notices to Settlement Class Members and their nominees. *See* Declaration of Lance Cavallo Regarding (A) Dissemination of Postcard Notice; (B) Publication of Summary Notice; (C) Establishment of Telephone Hotline and Settlement Website; and (D) Report on Requests for Exclusion Received to Date, dated November 6, 2026, attached hereto as Exhibit 4 ("Mailing Decl."), ¶¶1-9. Additionally, Verita has posted the Postcard Notice, Claim Form, and long-form Notice, along with other relevant documents, on the website www.EverbridgeSecuritiesSettlement.com, and has caused the Summary Notice to be published in *The Wall Street Journal* and transmitted over *PR Newswire*. *See* Ex. 4, Mailing Decl., ¶¶10, 12. As ordered by the Court and stated in the notices, objections and requests for exclusion from the Settlement Class are due no later than November 25, 2026. To date, there have been no objections to any aspect of the Settlement and no requests for exclusion.[6]

[6] Lead Plaintiffs and Lead Counsel will report on any objections and requests for exclusion that may be received after this submission in their reply submission to be filed with the Court on or before December 10, 2026.

II. SUMMARY OF LEAD PLAINTIFFS' CLAIMS

16. Lead Plaintiffs' claims in this Action are set forth in the Corrected Operative Second Amended Class Action Complaint for Violation of the Federal Securities Laws filed on January 28, 2026 (ECF No. 169) (the "Operative Complaint"), which asserts claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §§78j(b) and 78t(a), and U.S. Securities and Exchange Commission ("SEC") Rule 10b-5.

17. The Operative Complaint alleges that, throughout the Class Period of February 18, 2020 through February 24, 2022, Defendants made a series of misrepresentations and omissions to investors about several acquisitions and their impact on Everbridge's revenue growth.

18. Everbridge, a global software company, provides enterprise software applications designed to automate and accelerate organizations' operational response to critical events. ¶48.[7] Everbridge initially focused on one product, its Mass Notification software. ¶49. However, the Company began to expand its product offerings, and viewed its Critical Event Management ("CEM") platform—a collection of products designed to manage and respond to critical events from a single platform—as the greatest growth opportunity. ¶¶50, 51, 53. Before the Class Period, Everbridge experienced 35% to 41% revenue growth between 2016 and 2019. ¶¶58-59. Importantly, Defendants allegedly touted that revenue growth was almost entirely organic and only a small percentage came from acquisitions. ¶¶60-61. However, shortly before and throughout the Class Period, Everbridge allegedly shifted its focus and engaged in a series of acquisitions to build out its CEM platform, assuring investors that the successful integration of these acquisitions would help drive long-term growth. ¶¶65, 68, 70, 81-82.

19. For example, Lead Plaintiffs allege that beginning with NC4—the first of the Class Period acquisitions—Defendants publicly declared they had successfully

[7] References to "¶" or "¶¶" are to paragraphs in the Operative Complaint.

integrated the acquired technology into Everbridge's platform, stating the Company had "***really integrated NC4 and Risk Center into our entire product offering***." ¶139. Defendants then made similar public statements concerning the acquisitions of Connexient, One2Many, and others, stating "***we now truly can be that unified enterprise-wide operating system***." ¶141. Unbeknownst to investors, Everbridge allegedly had not successfully integrated the acquired companies or their technologies into the CEM product, ¶¶140, 142-43, and with each additional acquisition, the integration problems allegedly intensified and further hindered Everbridge's revenue growth. ¶72.

20. In April 2021, Everbridge announced it had acquired xMatters—its largest acquisition to date. ¶83. Defendants allegedly knew internally that the Company's revenue growth began to slow from the failed integrations, and thus, used the xMatters acquisition and its acquired revenue to mask Everbridge's slowing revenue growth. ¶¶90-91. As alleged in the Operative Complaint, Defendants knew xMatters would contribute $20-25 million to revenue for the rest of 2021 but told investors that xMatters would contribute only $9-11 million, allowing Defendants to add the rest of acquired revenue to total revenue. ¶¶85-88. This allegedly hid from investors that Everbridge's organic revenue growth was declining due to, in part, failed integrations.

21. Further, like the other Class Period acquisitions, the Operative Complaint alleges that Defendants failed to successfully integrate xMatters. For example, Lead Plaintiffs allege that Everbridge never integrated xMatters' client relationship management software and salespeople. ¶¶115-20. These alleged integration problems led to heightened attrition within the legacy xMatters sales organization, hindering Everbridge's ability to generate sales. ¶¶121-23. Even with these red flags, Defendants allegedly continued to falsely maintain they had already successfully integrated xMatters. ¶¶153-64.

22. The Complaint alleges that Everbridge began to reveal facts about the Company's slowing revenue growth and failed integrations through two alleged corrective disclosures. ¶191.

23. First, on December 9, 2021, Defendants issued revenue guidance of 20-23% growth—well below the Company's historical 30%-plus revenue growth forecast. ¶¶166, 168. Defendants also announced the resignation of Meredith as CEO and member of the Board of Directors. ¶¶148, 167. Allegedly in response to this news, Everbridge's stock price fell $52.37 per share, or more than 45%, to close at $63.00 on December 10, 2021. ¶169.

24. Then, on February 24, 2022, Defendants allegedly revealed the full truth when they lowered 2022 revenue guidance to 15-17% growth, and admitted the allegedly concealed fact that "incomplete integrations" had created "adverse impacts on [the] business, our go-to-market strategy and sales organization." ¶¶176, 179-80. Consequently, Defendants announced they were pausing acquisitions in order to focus on "accelerating product integrations across our existing acquired assets." ¶181. Allegedly on this news, Everbridge's stock price fell an additional $15.68 per share, or approximately 34%, to close at $30.61 on February 25, 2022. ¶182.

25. In sum, the Operative Complaint alleges that Everbridge stock was artificially inflated as a result of the allegedly false and misleading statements and omissions, and the price of Everbridge stock declined when the truth about the Company's failed integrations and slowing organic revenue growth was revealed to the market, causing damages to the Settlement Class. ¶¶136-164.

III. RELEVANT PROCEDURAL HISTORY OF THE ACTION AND LEAD COUNSEL'S LITIGATION EFFORTS

A. Commencement of the Action and Appointment of Lead Plaintiffs and Lead Counsel

26. On April 4, 2022, Sylebra Funds initiated the Action by filing an initial complaint in the United States District Court for the Central District of California (the

"Court" or "District Court"), alleging violations of the Exchange Act, 15 U.S.C. §§78j(b) and 78t(a), and SEC Rule 10b-5 promulgated thereunder, 17 C.F.R. §240.10b-5, on behalf of a class of all persons and entities who purchased or otherwise acquired Everbridge common stock during the class period. *See* ECF No. 1. The initial complaint was supported by an independent investigation by the Sylebra Funds, including the identification of and discussions with a key confidential witness, Ex. 1 at ¶5, and Labaton.

27. The Sylebra Funds were the only movants for lead plaintiff in the Action. On June 3, 2022, the Sylebra Funds filed a motion seeking to be appointed Lead Plaintiff and seeking appointment of their counsel, Labaton Sucharow LLP (n/k/a Labaton Keller Sucharow LLP). ECF No. 33. On June 17, 2022, the Sylebra Funds filed a Notice of Unopposed Motion as no competing motions seeking appointment as lead plaintiff were filed. ECF No. 43. By Order dated July 8, 2022, Judge Fred W. Slaughter: (i) appointed the Sylebra Funds as Lead Plaintiffs; and (ii) approved their selection of Labaton as Lead Counsel and Robbins Geller Rudman & Dowd LLP as Liaison Counsel. ECF No. 45.

28. On July 18, 2022, the parties filed a joint stipulation setting the schedule for Lead Plaintiffs' amended complaint and briefing schedule for defendants' response thereto. ECF No. 46. On July 19, 2022, the District Court entered the joint stipulation and ordered Lead Plaintiffs to file their amended complaint no more than 60 days after the filing of the parties' joint stipulation. ECF No. 47.

B. Lead Plaintiffs' Investigation, Filing of the Amended Class Action Complaint, and Defendants' First Round of Moving to Dismiss

29. Prior to filing the amended complaint, Lead Counsel conducted an extensive investigation into the facts underlying the potential claims and defenses, which included the review and analysis of: (i) documents filed publicly by the Company with the SEC; (ii) publicly available information, including press releases, news articles, transcripts of earnings calls, and other public statements issued by or

concerning the Company and the defendants; (iii) Company website and marketing materials; (iv) price and volume data for Everbridge common stock; (v) research reports issued by securities and financial analysts concerning the Company; (vi) news and media reports concerning the Company and other facts related to this Action; (vii) other publicly available information; and (viii) the applicable law governing the claims and potential defenses. Additionally, Lead Counsel interviewed former employees of Everbridge to discuss the issues related to the Action and engaged experts in damages and loss causation. The amended complaint pled information from 11 confidential witnesses ("CWs").

30. On September 16, 2022, Lead Plaintiffs filed an Amended Class Action Complaint for Violation of the Federal Securities Laws ("First Amended Complaint" or "FAC"), asserting claims under Sections 10(b) and 20(a) of the Exchange Act against Everbridge, Jaime Ellertson, and the Individual Defendants.[8] The FAC alleged that, from November 4, 2019 through February 24, 2022, inclusive, the price of Everbridge common stock was artificially inflated as a result of defendants' allegedly false and misleading statements and omissions, and declined when the truth was allegedly revealed through two corrective disclosures. *See* ECF No. 53.

31. On October 31, 2022, defendants filed a 35-page motion to dismiss the FAC in its entirety, pursuant to Rule 12(b)(6). ECF No. 58. In support of their motion, defendants submitted 18 exhibits totaling over 240 pages.

32. In their motion to dismiss, defendants argued that the FAC should be dismissed on numerous grounds, including, among others, that: (i) Lead Plaintiffs failed to plead any actionable misstatement or omission; (ii) Lead Plaintiffs failed to allege facts necessary to support the "strong inference" of scienter required against each defendant under the heightened requirements of the PSLRA; and (iii) Lead

[8] On January 6, 2026, the Parties filed a stipulation of dismissal of then-named defendant Jaime Ellertson with prejudice as to the Section 10(b) claim and without prejudice as to the Section 20(a) claim. *See* ECF No. 165.

Plaintiffs failed to plead the allegations with the strict particularity required under Rule 9(b) and Ninth Circuit law. In their motion to dismiss, defendants attacked the confidential witness allegations, arguing that of the 11 CWs Lead Plaintiffs pled in the FAC only CW1 offered statements regarding scienter—and still, CW1 failed to meet the Ninth Circuit's standards for CW reliability. Defendants also argued Lead Plaintiffs failed to plead loss causation as to the December 2021 corrective disclosure because that alleged corrective disclosure did not reveal any relevant truth concealed by the alleged misstatements. *See* ECF No. 58-1.

33. Lead Counsel reviewed and analyzed defendants' motion to dismiss the FAC and the legal authority cited therein. Lead Counsel also conducted extensive legal research into defendants' arguments and potential responses thereto. On December 15, 2022, Lead Plaintiffs filed a 35-page opposition to the motion to dismiss the FAC. ECF No. 61. Lead Plaintiffs rebutted the arguments and authorities in defendants' motion to dismiss the FAC and argued that the FAC adequately alleged all elements of the Exchange Act claims. Among other things, in their opposition, Lead Plaintiffs contended that defendants' alleged misstatements and omissions regarding Everbridge's growth strategy, revenue contributions, and integration of acquisitions were false and misleading when made. Lead Plaintiffs also argued that a strong inference of scienter was adequately pled, based on, for example, reliable and specific CW allegations, the core operations doctrine as the CEM platform was critical to the Company's growth, Meredith's abrupt departure, and defendants' statements themselves. Lead Plaintiffs also contended that loss causation with respect to the alleged December 2021 corrective disclosure was adequately pled. *See* ECF No. 61.

34. On January 17, 2023, defendants filed their reply brief in further support of the motion to dismiss the FAC. ECF No. 65.

35. On May 9, 2023, without oral argument, the District Court issued an order granting defendants' motion to dismiss the FAC. The District Court concluded the FAC did not adequately plead the necessary elements of falsity and scienter. ECF No. 79.

36. As to falsity, the District Court found that many of the challenged statements were covered by the PSLRA's safe harbor for forward-looking statements and were "otherwise vague, positive assertions of optimism" not actionable under Section 10(b) and Rule 10b-5 because the FAC failed to allege reasons why these statements were false and misleading at the time they were made (as opposed to "growing pains" or poor management decisions). *Id.* at 11, 17. The District Court found that other statements "specifically concerning the asserted change in Everbridge's growth strategy" were not plausibly false or misleading, and Lead Plaintiffs' reliance on later revised disclosures of decreases in revenue amounts to "fraud by hindsight." *Id.* at 11.

37. As to scienter, the District Court found that (i) the CWs' statements were "described with insufficient detail," and (ii) the CWs' statements that were sufficiently reliable did not support a strong inference of scienter (or demonstrate the falsity of defendants' statements). *Id.* at 22. The District Court also found that "the circumstances surrounding Meredith's departure [were] not so uncharacteristic or accompanied by suspicious circumstances" to support an inference that Meredith resigned "on account of purportedly fraudulent representations." *Id.* at 23.

38. Because the District Court found the FAC failed to adequately plead falsity and scienter, it dismissed Lead Plaintiffs' claims under Section 10(b) and Rule 10b-5. The Section 20(a) control person claims were dismissed derivatively for lack of a primary Section 10(b) violation. The District Court dismissed the FAC without prejudice and directed Lead Plaintiffs to file an amended complaint within 30 days of the order. *Id.* at 26-27.

C. Lead Plaintiffs' Filing of the Second Amended Complaint and Defendants' Second Round of Moving to Dismiss

39. On June 30, 2023, Lead Plaintiffs filed a Second Amended Class Action Complaint for Violation of the Federal Securities Laws ("Second Amended Complaint" or "SAC"), asserting claims under Sections 10(b) and 20(a) of the

Exchange Act against Everbridge, Jaime Ellertson, and the Individual Defendants. ECF No. 84.

40. Prior to filing the SAC, Lead Counsel reopened their investigation related to the claims, defenses, and underlying events that are the subject of the Action. In amending, Lead Plaintiffs sought to cure deficiencies the District Court raised in its motion to dismiss order (*see* ECF No. 79), including the addition of five CWs and bolstering the descriptions of CW1, CW2, and CW3 to support their reliability. Like the FAC, the SAC alleged that, from November 4, 2019 through February 24, 2022, inclusive, the price of Everbridge common stock was artificially inflated as a result of defendants' allegedly false and misleading statements and omissions, and declined when the truth was allegedly revealed through two corrective disclosures. *See* ECF No. 84.

41. On August 14, 2023, defendants filed a 35-page motion to dismiss the SAC in its entirety, pursuant to Rule 12(b)(6). ECF No. 85. In support of their motion, defendants submitted 22 exhibits totaling approximately 530 pages.

42. In their motion to dismiss, defendants argued that the SAC should be dismissed on numerous grounds, including, among others, that: (i) the additional CW allegations did not warrant re-examination; (ii) Lead Plaintiffs challenged the same statements previously rejected by the District Court because they were forward-looking statements protected under the PSLRA or constituted inactionable corporate optimism or puffery; (iii) the SAC lacked any allegations supporting scienter; and (iv) Lead Plaintiffs still did not plead loss causation in connection with the December 2021 alleged corrective disclosure. *See* ECF No. 85-1.

43. Lead Counsel reviewed and analyzed defendants' motion to dismiss the SAC and the legal authority cited therein. Lead Counsel also conducted extensive legal research into defendants' arguments and potential responses thereto. On September 28, 2023, Lead Plaintiffs filed an opposition to defendants' motion to dismiss the SAC. ECF No. 90. Lead Plaintiffs rebutted the arguments and authorities in defendants'

motion to dismiss the SAC and argued that the SAC adequately alleged all elements of its Exchange Act claims.

44. Among other things, in their opposition, Lead Plaintiffs contended that they had directly addressed the District Court's concerns regarding CW1's reliability via additional details about CW1's employment and duties. Lead Plaintiffs also contended that specific allegations—bolstered by CW1's description and five new, corroborating CWs—established defendants made material misstatements and omissions regarding Everbridge's acquisitions, leading investors to believe the Company's growth was sustainable and organic. Lead Plaintiffs further contended that the SAC sufficiently alleged scienter, and cured deficiencies from the FAC, through (i) CW allegations; (ii) Meredith's abrupt departure; and (iii) the core operations doctrine as the CEM platform was critical to the Company's growth. Finally, Lead Plaintiffs contended that loss causation with respect to the December 2021 alleged corrective disclosure was adequately pled. *See* ECF No. 90.

45. On October 30, 2023, defendants filed their reply brief in further support of the motion to dismiss the SAC. ECF No. 94.

46. On January 4, 2024, the District Court heard oral argument on defendants' motion to dismiss the SAC and took the motion under submission. ECF No. 102. On March 18, 2024, the District Court issued an order granting defendants' motion to dismiss the SAC without prejudice and with leave to amend. ECF No. 109. The District Court again concluded the SAC did not adequately plead the necessary elements of scienter and falsity.

47. As to scienter, the District Court found that the SAC, like the FAC, did not sufficiently establish that the CWs' allegations "evince a strong inference of scienter" as the SAC lacked sufficient details to support their assertions, "particularly given the allegations' conclusory nature without sufficient foundation." *Id.* at 14. The District Court also found that the SAC's allegations regarding Meredith's departure and the core operations theory were "materially similar," finding (i) Meredith's

departure as CEO was not sufficiently suspicious to support scienter; and (ii) the allegations "too unspecific" to use the core operations theory to bolster scienter. *Id.* at 15-16.

48. As to falsity, the District Court noted, because the SAC failed to plausibly allege scienter, the SAC was subject to dismissal "on that basis alone" (and consequently, the District Court also need not address defendants' argument that the SAC fails to plead loss causation). *Id.* at 17. However, the District Court noted it previously found certain statements in the FAC were not plausibly alleged to be false because: (i) the PSLRA's safe harbor applied to certain statements regarding "integration" and revenue projections; (ii) certain statements were "general expressions of optimism" and thus nonactionable puffery; (iii) defendants did not have an affirmative obligation to delineate between "organic" and "inorganic" revenue, and defendants' statements regarding "buying revenue" did not contradict "integration" challenges; and (iv) post-acquisition "integration" challenges "amounted to pleading fraud by hindsight." *Id.*

49. Because the District Court found the SAC failed to adequately plead falsity and scienter, it dismissed Lead Plaintiffs' claims under Section 10(b) and Rule 10b-5. The Section 20(a) control person claims were dismissed derivatively for lack of a primary Section 10(b) violation. The District Court dismissed the SAC without prejudice and with leave to amend. *Id.* at 17-19.

D. Lead Plaintiffs' Appeal of District Court's Dismissal of the Second Amended Complaint

50. On April 16, 2024, Lead Plaintiffs filed a notice of appeal to the United States Court of Appeals for the Ninth Circuit (the "Ninth Circuit") (ECF No. 110), and on May 30, 2024, the District Court entered judgment in favor of defendants on all claims asserted by Lead Plaintiffs (ECF No. 114).

51. On October 8, 2024, Lead Plaintiffs submitted their opening brief with the Ninth Circuit (9th Cir. Case No. 24-2474, ECF No. 13), arguing, among other things,

(i) the SAC pled reliable CW allegations; (ii) the SAC pled actionable misstatements; and (iii) the SAC adequately alleged loss causation. On January 16, 2025, defendants filed their answering brief with the Ninth Circuit (9th Cir. Case No. 24-2474, ECF No. 20), arguing, among other things, (i) the CW allegations failed to meet the strict pleading requirements of Rule 9(b) and the PSLRA; (ii) Lead Plaintiffs failed to adequately plead that any statement was false or misleading when made; and (iii) Lead Plaintiffs did not seek reversal of the District Court's dismissal on scienter grounds, mooting the need for the appeal. *See id.* On February 6, 2025, Lead Plaintiffs filed their reply brief with the Ninth Circuit. 9th Cir. Case No. 24-2474, ECF No. 27.

52. On May 20, 2025, the appeal regarding defendants' motion to dismiss the SAC was argued by the parties in Pasadena, California before Ninth Circuit Judges Wardlaw, Graber, and Johnstone.

53. On July 15, 2025, the Ninth Circuit issued its decision, reversing and remanding, in part, the order of the District Court dismissing the SAC. 9th Cir. Case No. 24-2474, ECF No. 34; *see also* ECF No. 116. In sum, the Ninth Circuit held that Lead Plaintiffs adequately alleged scienter as to Everbridge's statements concerning post-acquisition integration and revenue estimates. ECF No. 116 at 4. The Ninth Circuit held that CWs 1, 2, and 3 were described with "sufficient particularity to establish their reliability and personal knowledge" of Everbridge's integration efforts, and each described "widespread" integration issues Everbridge was experiencing, which contradicted the Company's public statements. *Id.* at 2-4.

54. The Ninth Circuit also found that falsity was adequately alleged for certain statements as they "neither fell within the safe harbor nor were puffery" because these statements relayed "past or current facts," but agreed with the District Court that the SAC failed to adequately plead statements concerning Everbridge's general acquisition strategy. *Id.* at 4-6. In so holding, the Ninth Circuit effectively shortened the class period to February 18, 2020 through February 24, 2022, inclusive.

55. On September 3, 2025, the mandate from the Ninth Circuit was entered in the District Court pursuant to Fed. R. App. P. 41(a). ECF No. 117.

E. Additional Procedural History Following the Ninth Circuit's Reversal and Remand to the District Court

56. On September 18, 2025, the parties filed a joint status report (ECF No. 145) and a joint stipulation regarding case scheduling (ECF No. 146). On September 25, 2025, the District Court entered an order setting pretrial and trial dates and included a deadline for the parties to stipulate to (1) the allegations stricken by the Ninth Circuit and (2) an operative complaint. ECF No. 149.

57. On October 8, 2025, after multiple meet-and-confer calls and the exchange of multiple iterations of the draft operative complaint, the Parties filed a notice of joint stipulation regarding a revised operative complaint. ECF No. 150. On October 15, 2025, Lead Plaintiffs filed a revised Second Amended Class Action Complaint for Violation of the Federal Securities Laws (ECF No. 152) as a new and separate docket entry per the Court's order. In accordance with the Ninth Circuit order, this complaint alleged claims during a class period of February 18, 2020 through February 24, 2022, inclusive (the Class Period).

58. After Defendants Everbridge, Meredith, and Brickley filed their answer and Ellertson separately filed his answer to the complaint, the Parties filed a joint stipulation and proposed briefing schedule for Ellertson's anticipated motion for judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c). ECF No. 160. Ellertson filed his motion for judgment on the pleadings on November 19, 2025 (ECF No. 161), Lead Plaintiffs filed their opposition to Ellertson's motion for judgment on the pleadings on December 5, 2025 (ECF No. 163), and Ellertson filed his reply in support of his motion on December 16, 2025 (ECF No. 164).

59. On January 6, 2026, the Parties filed a stipulation of dismissal of Ellertson with prejudice as to the Section 10(b) claim and without prejudice as to the Section 20(a) claim. ECF No. 165. In consideration of Ellertson's dismissal, on January 23,

2026, the Parties filed a joint stipulation in support of the filing of a further revised complaint (ECF No. 167), which the District Court approved on January 26, 2026 (ECF No. 168).

60. On January 28, 2026, Lead Plaintiffs filed a Corrected Operative Second Amended Class Action Complaint for Violation of the Federal Securities Laws (the "Operative Complaint") asserting claims pursuant to Sections 10(b) and 20(a) of the Exchange Act and Rule 10b-5 promulgated thereunder against Everbridge, Meredith, and Brickley. ECF No. 169.

61. On February 9, 2026, Defendants filed their Answer to the Operative Complaint. ECF No. 172. In the Answer, Defendants denied Lead Plaintiffs' claims in their entirety, and asserted 37 affirmative or other defenses, including loss causation, lack of falsity and scienter, and lack of reliance, among others.

F. Lead Plaintiffs' Motion for Class Certification

62. On March 12, 2026, Lead Plaintiffs and proposed additional class representative Central Laborers filed their motion for class certification and appointment of class representatives and co-class counsel (ECF Nos. 173, 173-1) (the "Class Certification Motion"), as well as Declarations by the Chief Investment Officer of the Sylebra Funds and Kenton Day on behalf of Central Laborers (ECF Nos. 173-4, 173-5). In support of the Class Certification Motion, Lead Plaintiffs submitted an expert report from Chad Coffman, CFA, addressing market efficiency and common damages methodologies. ECF No. 173-3.

63. Based on the expert analyses that Mr. Coffman conducted and described in his report, which included a detailed event study examining the cause-and-effect relationship between the release of new Company-specific information and movements in the price of Everbridge common stock, Mr. Coffman opined that the market for Everbridge common stock was efficient during the Class Period. Mr. Coffman also opined that damages could be calculated on a class-wide basis using a common methodology. *See id.*

64. In connection with opposing the Class Certification Motion, Defendants took four depositions. First, Defendants deposed Central Laborers' investment manager, non-party Rhumbline Advisers LP ("Rhumbline"), on April 17, 2026. Second, Defendants deposed Lead Plaintiffs' damages expert, Mr. Coffman, on April 22, 2026. Third, Defendants deposed Lead Plaintiffs Sylebra Funds' 30(b)(6) corporate designee, Daniel Gibson, its the Chief Investment Officer, on April 27, 2026. Fourth, Defendants deposed Central Laborers' 30(b)(6) corporate designee, Kenton Day, on April 30, 2026.

65. On May 18, 2026, Defendants filed their opposition to the Class Certification Motion (ECF No. 185), submitting an expert report from Douglas J. Skinner, Ph.D. in support (ECF No. 185-24).

66. Defendants made three primary arguments in opposition to the Class Certification Motion. First, Defendants argued that "individual issues of reliance predominate[d]" over common issues. ECF No. 185. Relying on *Goldman Sachs Grp., Inc. v. Ark. Tchr. Ret. Sys.*, 594 U.S. 113, 119 (2021) ("*Goldman I*"), Defendants claimed a lack of price impact based on a "mismatch" between the contents of the alleged misrepresentations and the alleged corrective disclosures. Second, Defendants argued Lead Plaintiffs failed to satisfy Federal Rule 23(b)(3)'s predominance requirement because they did not meet their burden to proffer a sufficient class-wide damages model. Specifically, citing *Comcast v. Behrend*, 569 U.S. 27, 33-35 (2013), Defendants claimed that Lead Plaintiffs' expert did not demonstrate a calculation method accounting for mismatches, the different categories of alleged misstatements, nor how damages may vary over time. Third, Defendants argued that the proposed class representatives were inadequate. *See* ECF No. 185.

67. When the Parties agreed to settle the Action, Lead Plaintiffs and Central Laborers were preparing to submit their reply in further support of class certification.

IV. THE PARTIES' DISCOVERY EFFORTS

68. Following the Ninth Circuit's partial reversal and remand to the District Court, Lead Plaintiffs undertook comprehensive discovery, which was geared to complying with the deadlines for class certification, fact discovery, expert discovery, and dispositive and pretrial motions in advance of the October 26, 2027 trial date.

A. Case Management Plan

69. As discussed in Section III.E, *supra*, the Parties filed a joint status report (ECF No. 145) in accordance with the Court's Order and submitted a joint stipulation regarding case scheduling after multiple meet and confer discussions (ECF No. 146). Following a September 25, 2025 status conference, the Court entered an order regarding case scheduling (ECF No. 149), formally setting a final pretrial conference and hearing on motions *in limine* for August 26, 2027 and a jury trial on October 26, 2027. Furthermore, the Court set various other deadlines, including (i) fact discovery completion by September 17, 2026; (ii) expert discovery completion by November 19, 2026; and (iii) dispositive motions to be filed by March 19, 2027.

70. Beginning in October 2025, the Parties began engaging in formal discovery efforts. Until that point, discovery had been stayed pursuant to the PSLRA. *See* 15 U.S.C. §78u-4(b)(3)(B). Lead Plaintiffs' efforts thereafter included exchanging initial disclosures, serving requests for production of documents and interrogatories, as well as subpoenas on third parties, deposition notices, and formal expert discovery in connection with the Class Certification Motion. As detailed below, the Parties' discovery included the production of approximately 222,100 documents (approximately 1,185,000 pages) by Lead Plaintiffs (and more than 12,000 pages by Central Laborers), Defendants, and third parties.

71. The discovery efforts set forth herein provided Lead Plaintiffs with a thorough understanding of the strengths and weaknesses of their claims and assisted Lead Counsel in considering and evaluating the fairness and adequacy of the Settlement.

B. Initial Disclosures and Protective Order

72. Beginning on October 17, 2025, the Parties exchanged initial disclosures pursuant to Rule 26(a). Lead Plaintiffs promptly reviewed and evaluated Defendants' initial disclosures, which included, among other things, the identification of individuals likely to have discoverable information, along with a brief description of the potential subjects of information that those individuals may possess. Lead Plaintiffs also provided supplemental initial disclosures on March 18, 2026.

73. The Parties engaged in a series of meet and confers to negotiate a protective order ("Protective Order") to govern the confidentiality of material produced in discovery and an electronic discovery agreement ("Electronic Discovery Agreement"). On November 12, 2025, the Parties filed a proposed stipulated Protective Order and a proposed stipulated order regarding the production of privileged information. ECF Nos. 155-1, 155-2. On February 2, 2026, Magistrate Judge Rozella A. Oliver approved and so ordered the proposed stipulation regarding the production of privileged information and the Protective Order. ECF Nos. 170-71.

C. Discovery Propounded on Defendants

74. Lead Plaintiffs served their first set of requests for the production of documents ("RFPs") on Defendants on October 24, 2025, which included 36 unique requests. On November 6, 2025, Lead Plaintiffs also served their first set of interrogatories on Defendants, which included nine interrogatories. Defendants served responses and objections to Lead Plaintiffs' first set of requests for the production of documents on November 24, 2025, and responses and objections to Lead Plaintiffs' first set of interrogatories on December 15, 2025.

75. The Parties engaged in multiple meet-and-confer conferences and exchanged meet-and-confer correspondence, as to the scope and manner of the requested document productions and interrogatories, including issues pertaining to search terms, relevant time periods, document custodians, and other disputes related to the requests. Through this comprehensive effort, the Parties were able to reach an

understanding as to the scope of Defendants' discovery and reached many compromises without having to seek the Court's assistance.

76. Through its discovery efforts, by June 2026, Lead Counsel obtained approximately 201,000 documents, totaling approximately 1,032,000 pages, from Defendants.

77. Lead Counsel conducted an efficient, robust review of these documents. A team of experienced attorneys analyzed the documents produced as they were received. These attorneys have expertise in securities litigation, and are experienced in utilizing the latest technology with respect to document review. These attorneys were integral to the litigation team and focused on reviewing Defendants' document productions for the purpose of anticipated fact depositions, expert reports, trial preparation, and preparing for settlement discussions.

78. To efficiently focus on the most relevant documents, Lead Counsel's attorneys used a Relativity eDiscovery platform and its search and data analytic software tools to analyze the data and target the most important communications, workpapers, and reports. The review was conducted with a combination of linear review, targeted search terms, and custodial document review.

79. The attorneys conducted targeted searching to isolate evidence and group documents by issue, potential deponent, and time period. The searches utilized text, file names, document types (*e.g.*, emails, memoranda, SEC filings, and correspondence), dates, bates numbers, etc., to identify relevant, irrelevant, and "hot" documents. Certain more complex documents were allocated and elevated to be reviewed by specific subject matter experts retained by Lead Counsel. Through experience and increasing familiarity with the documents, the document review team identified key documents for use in connection with class certification, mediation efforts, and later, preparing for fact and expert depositions, summary judgment, and trial. The review team analyzed and coded these documents, prepared for weekly and periodic "hot" document meetings and created deposition preparation exhibit kits for

upcoming depositions, which included reviewing and coding all deponent custodial documents if practicable, or in the alternative, the use of targeted searches, and organizing the final set of documents for use at deposition.

80. At the start of the document review, attorneys on the litigation team worked with the document review team to establish a document coding protocol, which set out the guidelines and framework within which the team would categorize each of the reviewed documents. To maintain performance standards and accuracy, the litigation and review teams held weekly document review sessions to discuss the results of their ongoing review, provide feedback, track progress on existing projects, and allocate new projects to be undertaken by specific members of the team. Throughout the case, the attorneys reviewing the documents prepared meaningful work product, including analyses of newly uncovered important documents, which updated and refined the team's knowledge and direction as to the issues and evidence in the case.

81. Building upon the knowledge learned through the document discovery process, Lead Plaintiffs served Defendants with a Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6) ("Rule 30(b)(6)") on April 15, 2026, identifying 16 unique topics for examination. Defendants served their responses and objections to Lead Plaintiffs' Rule 30(b)(6) Deposition notice on May 22, 2026. The Parties engaged in a meet and confer to discuss the scope of examination topics. Lead Plaintiffs also served Notices of Deposition on six former Everbridge employees.

D. Discovery Propounded on Lead Plaintiffs and Central Laborers

82. Defendants served their first set of RFPs and their first set of interrogatories on November 14, 2025. On March 17 and 20, 2026, Defendants also served sets of RFPs and interrogatories on proposed additional class representative Central Laborers. On April 1, 2026, Defendants served a Rule 30(b)(6) Notice of Deposition on Lead Plaintiffs and Central Laborers. Defendants also served their second set of RFPs on Lead Plaintiffs on April 7, 2026.

83. Lead Plaintiffs served responses and objections to Defendants' first set of RFPs on December 15, 2025, and to Defendants' second set of RFPs on May 7, 2026. Lead Plaintiffs served responses and objections to Defendants' first set of interrogatories on December 22, 2025. Lead Plaintiffs also served responses and objections to Defendants' Rule 30(b)(6) Notice of Deposition on April 10, 2026.

84. Central Laborers served their responses and objections to Defendants' first and second sets of interrogatories on March 30, 2026. Central Laborers served their responses and objections to Defendants' first and second sets of requests for production on April 3, 2026. Central Laborers served their responses and objections to Defendants' Rule 30(b)(6) Notice of Deposition on April 16, 2026.

85. The Parties engaged in extended meet-and-confer conferences and exchanged multiple meet-and-confer emails and other correspondence to negotiate the scope of discovery on Lead Plaintiffs and Central Laborers. The Parties were able to reach a compromise on Plaintiffs' productions without seeking the Court's assistance. Plaintiffs produced responsive documents in connection with Defendants' discovery requests. Lead Plaintiffs produced approximately 15,000 documents (approximately 102,000 pages) to Defendants, and Central Laborers produced more than 12,000 pages.

86. On April 27, 2026, Defendants deposed Lead Plaintiffs Sylebra Funds' 30(b)(6) corporate designee, Daniel Gibson. On April 30, 2026, Defendants also deposed Central Laborers' 30(b)(6) corporate designee, Kenton Day.

E. Discovery Propounded on Third Parties

87. Lead Plaintiffs noticed the issuance of document subpoenas to several non-parties on March 26, 2026. Lead Plaintiffs served third-party subpoenas on Ernst & Young LLP, KBF CPAs – Audit, LLP, and William Blair & Company, LLC, seeking, *inter alia*, the production of documents related to services performed for Everbridge, including research and analysis related to Everbridge's acquisitions and organic revenue growth calculation. These third parties produced approximately 6,100 documents (approximately 51,000 pages).

F. Depositions

88. Plaintiffs' Counsel defended four depositions in connection with class discovery and the Class Certification Motion:

(a) Central Laborers' non-party investment manager, Rhumbline, and its corporate designee, Julie Carman Lee, regarding topics including Central Laborers' investments in Everbridge, on April 17, 2026.

(b) Lead Plaintiffs' market efficiency and damages expert, Mr. Coffman, in connection with Mr. Coffman's expert report filed in support of Lead Plaintiffs' Class Certification Motion, on April 22, 2026.

(c) Lead Plaintiffs Sylebra Funds' 30(b)(6) corporate designee, Daniel Gibson, Chief Investment Officer, regarding topics including Lead Plaintiffs' investments in Everbridge, on April 27, 2026.

(d) Central Laborers' 30(b)(6) corporate designee, Kenton Day, regarding topics including Central Laborers' investments in Everbridge, on April 30, 2026.

89. Moreover, Plaintiffs' Counsel had noticed and was preparing for six additional fact depositions that would have otherwise begun immediately, as well as Defendants' Rule 30(b)(6) deposition, in which Defendants had elected Patrick Brickley to serve as Everbridge's Rule 30(b)(6) designee. The Parties were in the process of finalizing a date for the Rule 30(b)(6) deposition when they entered a settlement agreement. Lead Counsel had begun compiling deposition preparation materials and was ready to take those depositions if the proposed Settlement had not been reached.

V. THE SETTLEMENT

A. The Parties' Settlement Negotiations

90. The Parties began exploring the possibility of a negotiated resolution of the claims in early Spring 2026. Specifically, the Parties agreed to participate in a mediation and retained David M. Murphy of Phillips ADR Enterprises to act as the mediator in the case (the "Mediator"). Mr. Murphy is a skilled mediator with decades of experience in complex commercial litigation and mediating securities class actions and related cases.

91. On June 1, 2026, Plaintiffs' Counsel and Defendants' Counsel, among others, participated in a full-day, in-person mediation session before the Mediator. In advance of that session, the Parties submitted detailed mediation statements to the Mediator, together with numerous supporting exhibits. The discussions were at all times arm's-length and adversarial, with each side vigorously representing its own interests. The June 1, 2026 mediation session ended without an agreement being reached.

92. The Parties continued discussions with the Mediator following the mediation to further explore the possibility of settlement. On June 13, 2026, the Parties accepted the Mediator's double-blind recommendation and, in so agreeing, reached a settlement-in-principle to resolve all claims in the Action, and related claims, on a class-wide basis for $85,000,000 in cash. The Parties' settlement in principle was subsequently memorialized in a confidential term sheet executed and finalized as of July 8, 2026 (the "Term Sheet"), subject to the execution of a formal settlement agreement.

93. On July 10, 2026, the Parties filed a Notice of Settlement (the "Notice of Settlement"), jointly informing the Court that they had reached a settlement in principle and requesting that the Court stay all case deadlines set forth in the Court's Order Re Joint Stipulation to Modify Case Management Schedule (ECF No. 184) to allow the

Parties to finalize documentation of the Settlement and file for preliminary approval of the Settlement. ECF No. 186.

94. On July 13, 2026, the Court issued an order regarding the Parties' Notice of Settlement. ECF No. 187. In so doing, the Court ordered all pending proceedings in this case vacated and taken off calendar; set the deadline for Lead Plaintiffs to file an appropriate motion for preliminary approval of settlement on or before August 10, 2026; and denied as moot Lead Plaintiffs' Class Certification Motion and appointment of class representatives and class counsel. *See id.*

B. Preparation of Settlement Documentation and Preliminary Approval Motion

95. Once the Parties agreed in principle to settle the Action, they worked diligently to negotiate the full settlement terms set forth in the Stipulation and its exhibits, as well as a confidential supplemental agreement regarding requests for exclusion ("Supplemental Agreement"). On August 10, 2026, the Parties executed the Stipulation setting forth the full terms and conditions of the Settlement, ECF No. 188-3, and the Supplemental Agreement.

96. The Settlement provides for, among other things, the payment of $85 million in cash into an interest-bearing Escrow Account, *see* Stipulation at ¶6, which has been deposited. The Settlement Amount, plus accrued interest, after the deduction of Court-awarded attorneys' fees and Litigation Expenses, Notice and Administration Expenses, Taxes, and any other costs or fees approved by the Court (the "Net Settlement Fund"), will be distributed to Settlement Class Members who submit timely and valid Claims, in accordance with a plan of allocation approved by the Court.

97. In exchange for payment of the Settlement Amount, on the Effective Date of the Settlement, Lead Plaintiffs and the Settlement Class will release the Released Defendant Parties from all of the Released Plaintiffs' Claims, and Defendants will release the Released Plaintiff Parties from all of the Released Defendants' Claims. *See* Stipulation ¶¶1(ee)-(ii), 4, and 5.

98. The Settlement is not "claims-made" and there is no reversion of unclaimed funds to Defendants. *See* Stipulation ¶12.

99. The amount of attorneys' fees and Litigation Expenses awarded by the Court is within the sole discretion of the Court. *See* Stipulation ¶14. There is no agreement between Defendants and Lead Plaintiffs about the amount of attorneys' fees to be paid to Plaintiffs' Counsel or a "clear sailing" agreement whereby Defendants will not object to the fee request. Any attorneys' fees that are sought by Plaintiffs' Counsel, but not awarded by the Court, will remain in the Settlement Fund and will not be paid back to Defendants.

100. On August 10, 2026, Lead Plaintiffs filed their Notice of Motion and Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 188 thru 188-6), the Declaration of Michael H. Rogers in support, and the Stipulation and Agreement of Settlement, among other exhibits.

101. On August 31, 2026, the Court entered a Minute Order granting Lead Plaintiffs' motion and, among other things, appointing Labaton and Robbins Geller as Co-Class Counsel for settlement purposes, appointing Verita as the Claims Administrator, approving the proposed notice program, and scheduling a final approval hearing for December 17, 2026. *See* ECF No. 190.

VI. THE SIGNIFICANT RISKS OF CONTINUED LITIGATION

102. The Settlement provides an immediate and certain benefit to the Settlement Class in the form of an upfront $85,000,000 cash payment. The merits of the Settlement must be considered in the context of the risks presented by continued litigation of the Action. Having considered the risks of continued litigation, in light of all proceedings and discovery performed in the Action, it is the informed judgment of Lead Plaintiffs and Lead Counsel that the proposed Settlement is fair, reasonable, and adequate and in the best interests of the Settlement Class.

103. The Settlement is the result of extensive arm's-length negotiations by fully informed parties and their counsel, resolves this hard-fought litigation, and represents

a very favorable result for the Settlement Class when considered on its own and when evaluated in light of the risks and challenges of continued litigation. Lead Plaintiffs and Lead Counsel understood that while they believe Lead Plaintiffs' claims were strong and could prevail at class certification, summary judgment, and trial, there were a number of factors that made the outcome of continued litigation uncertain, weighing in favor of a settlement.

104. Principally, and as discussed below, although Lead Plaintiffs convinced the Ninth Circuit to revive some of their claims, there was a real possibility that the District Court would credit Defendants' price impact arguments at class certification, including Defendants' *Goldman I* "mismatch" arguments, or find at summary judgment that the alleged corrective disclosures did not cause the losses for which Lead Plaintiffs seek to recover. If that were the case, then Lead Plaintiffs and the Settlement Class would have been exposed to significant risks of reduced recovery or no recovery at all. Lead Plaintiffs acknowledge that they faced challenges in establishing the required elements to sustain the claims through class certification, summary judgment, and trial.

105. Overall, document discovery, the factual record developed to date, the briefing of the Class Certification Motion and Defendants' opposition thereto, and the Parties' settlement negotiations allowed Lead Plaintiffs and Lead Counsel to undertake a comprehensive evaluation of the strengths and weaknesses of the claims. Based on that evaluation, Lead Counsel (a firm with extensive experience in the prosecution and trial of complex securities litigation) together with Lead Plaintiffs (sophisticated investors with billions of dollars in assets under management) determined that the Settlement was in the best interests of the Settlement Class.

106. Moreover, Lead Counsel respectfully submits that it and Robbins Geller assumed significant risk in prosecuting this Action on an entirely contingent basis. From the time that Lead Counsel agreed to take on the case, settlement was by no means guaranteed and certainly not at the level ultimately achieved. Plaintiffs' Counsel faced the significant risks present in any securities class action—particularly so here

given that the complaints were dismissed twice—as well as unique risks involved in proving Defendants' liability and damages in this case.

A. Risks Related to Proving Falsity

107. While Lead Plaintiffs and Lead Counsel believe that the claims asserted here are strong, they recognize that this Action presented substantial risks to proving liability. As a threshold matter, despite the Ninth Circuit's order and reversal, in part, Lead Plaintiffs faced ongoing challenges with respect to proving that Defendants made materially false and misleading statements, an essential element of the Exchange Act claims.

108. To prevail on the Section 10(b) and Rule 10b-5 claims, Lead Plaintiffs bore the burden of proving that each of the eight remaining alleged misstatements was materially false or misleading when made. The challenged statements concerned (i) the alleged problems Everbridge faced as a result of Defendants' failure to integrate the Company's acquisitions, and (ii) the extent to which xMatters' revenue contribution was allegedly being used to hide increasingly lower organic revenue growth.

109. Drawing on several arguments, including those made in the two motions to dismiss and the subsequent appeal, Defendants mounted vigorous defenses to these challenged statements, which posed real risks of an adverse outcome at summary judgment, trial, or on appeal even with a successful verdict. For example, the first alleged misstatement, on February 18, 2020, alleged that Defendants misled investors about "***integrat[ing] NC4 and Risk Center into our entire product offering***." ¶139. However, Defendants would likely argue that this statement simply meant NC4 was no longer sold as a standalone product—and thus, not connected to Lead Plaintiffs' alleged reasons as to why this statement was false. Defendants would have likely presented evidence demonstrating that the Company sold NC4's system together with Everbridge's Risk Center product offering, cutting against Lead Plaintiffs' position that Everbridge had not successfully integrated NC4. Similarly, with respect to the second alleged misstatement, on March 23, 2020, Defendants would likely argue that the

statement regarding "225 out-of-the-box integrations" providing a "unified enterprise-wide operating system" was referring to Everbridge's compatibility with third-party software systems, and therefore, had nothing to do with integrating the acquired companies into Everbridge's CEM platform. ¶141.

110. Moreover, Defendants would also likely argue that the remaining statements—which addressed the xMatters acquisition—were not actionable, false, or misleading statements. Specifically, Defendants would have argued that the xMatters revenue statements, including xMatters' partial year contribution of approximately $9-11 million (¶144) and that expectations for the "financial contribution from xMatters" remained unchanged (¶150), were inactionable forward-looking statements protected by the PSLRA safe harbor, 15 U.S.C. §78u–5(c)(1), because they concern future revenue projections for the rest of the year, or were otherwise a reasonable accounting judgment made by Everbridge's Chief Financial Officer, Defendant Brickley, who had a reasonable basis to project that xMatters would contribute $9-11 million to the Company's 2021 revenue.

111. Regarding the xMatters integration statements (¶¶154, 158, 159, 161, 163), Defendants would likely argue that no reasonable investor would have understood these statements (*i.e.*, "***we've locked up key hires, and we're retaining them***" and "***the seamless integration of the Everbridge and xMatters enterprise IT and cyber resilience solutions***") to mean anything other than the Company was making progress towards integrating xMatters—not that employee departures were not occurring or that Everbridge had not experienced any problems integrating xMatters.

112. Lead Plaintiffs believe they have developed strong evidence to rebut these arguments, nevertheless the risk that the Court or a jury could credit Defendants' evidence and arguments was substantial and weighed in favor of settlement.

B. Risks to Proving Scienter

113. Lead Plaintiffs also faced significant challenges with respect to proving Defendants' scienter. On this point, Defendants likely would have argued that Lead

Plaintiffs could not establish that the alleged misstatements were made with the requisite fraudulent intent.

114. For example, for the xMatters revenue statements, Defendants would likely have argued that the $9-11 million number was a projection that Defendant genuinely believed and that was supported by reasonable accounting judgments. For the remaining xMatters integration statements, Defendants likely would have argued that Lead Plaintiffs only rely upon circumstantial evidence and CWs (many of whom the Ninth Circuit did not explicitly find reliable and some of whom were twice discredited by the District Court at the motion to dismiss stage), and therefore, Lead Plaintiffs cannot prove any allegations of motive to commit fraud. Moreover, Defendants would argue that CW 3's allegations only pertain to RedSky—an acquisition connected to no alleged false or misleading statement.

115. Lead Plaintiffs would also face the argument that the revenue statements made in 2021 were forward-looking and, thus, would have to prove actual knowledge of falsity—an objectively high bar.

116. While Lead Plaintiffs believe they could adduce sufficient evidence of scienter, they nonetheless recognize the risks they faced in convincing a jury that Defendants acted with the requisite fraudulent intent.

C. Risks in Proving Loss Causation and Damages

117. Even if Lead Plaintiffs were successful in proving material falsity and scienter with respect to the misstatements alleged in the Operative Complaint, they faced significant challenges and uncertainty with respect to proving loss causation and damages.

118. Defendants raised serious arguments that Lead Plaintiffs could not show that the stock price declines following each allegedly corrective disclosure were attributable to the alleged fraud. And, similar to the argument Defendants advanced in opposing class certification, Defendants would continue to assert that there was no

causal connection between the contents of the alleged misrepresentations and the alleged corrective disclosures.

119. Specifically, Defendants likely would have argued that the subject matter of the alleged corrective disclosures on December 9, 2021 and February 24, 2022 did not correct or reveal anything about the integration statements in 2020 and the xMatters revenue contribution and integration statements. For example, and as they argued in the two motions to dismiss, Defendants would have argued that the December 9, 2021 announcement of Meredith's departure and revenue guidance for *2022* revealed nothing about Everbridge's integrations of the 2020 acquisitions, *i.e.*, NC4, Connexient, CNL, and One2Many, or xMatters' revenue contribution figures in *2021*. Similarly, Defendants would have argued that the February 24, 2022 disclosure of the Company's strategic review of its integration strategy did not address the acquisitions in 2020, that the disclosure of the incomplete integration with xMatters was not new information (because Defendants had warned investors of the risk), and that Everbridge's reduced guidance for *2022* could not correct xMatters' revenue contribution figures for *2021*. Accordingly, the risk of Defendants eliminating one or both of the alleged corrective disclosures stood as a real threat to damages, if Defendants' arguments were successful.

120. Lead Plaintiffs consulted with an expert in damages and loss causation who analyzed class-wide damages in light of the circumstances presented in this case and developed through the discovery process to date. Lead Plaintiffs' consulting damages expert estimated that maximum damages attributable to the two alleged corrective disclosures were between approximately $1.38 billion and $1.76 billion, depending on the trading model and assumptions used. Accordingly, the Settlement recovers a range of approximately 4.8% to 6.2% of maximum estimated damages.

121. While Lead Plaintiffs are confident they could have overcome Defendants' arguments, the class would have faced a substantial risk that a favorable ruling on any one of Defendants' arguments would have significantly reduced or

eliminated their recovery. For example, if the Court dismissed the first two alleged misstatements at class certification or summary judgment, and found this case was limited to the xMatters acquisition revenue and integration statements, maximum damages would be reduced by more than 50%, to between approximately $648 million and $860 million (for a Class Period that began on April 6, 2021). In this scenario, the Settlement recovers a range of approximately 9.9% to 13.1% of these estimated damages.

122. The estimates provided above, however, do not disaggregate confounding non-fraud related information that was released on either alleged corrective disclosure day. If disaggregation of confounding information was required, damages in the full Class Period scenario with both alleged corrective disclosures would be reduced to between $1.29 billion and $1.59 billion. Similarly, damages for the Class Period beginning on April 6, 2021 (the first xMatters alleged misstatement) would be reduced to between approximately $587 million and $752 million, based on Lead Plaintiffs' damages expert's methodology. In these scenarios, the Settlement recovers a range of approximately 5.3% to 14.5% of these estimated damages.

123. Indeed, and as they argued in the two motions to dismiss, Defendants also would have likely argued that the first alleged corrective disclosure did not correct any of the alleged misstatements because it merely disclosed the resignation of Defendant Meredith and announcement of 2022 revenue guidance—neither of which related to the subject matter of the alleged misstatements. If the Court or a jury credited this argument, and the Class Period was limited to just the final alleged corrective disclosure, estimated damages for the full Class Period would be limited to approximately $154 million to $184 million, and damages for the Class Period beginning on April 6, 2021 would be between $102 million and $129 million. In these scenarios, the Settlement recovers a range of approximately 46.2% to 55.2% for the full Class Period and 65.9% to 83.3% for the Class Period beginning on April 6, 2021.

124. In light of these substantial risks, the $85 million Settlement represents a very favorable result for the Settlement Class. The recovery compares very favorably to the median recovery in securities class actions in the first half of 2026. According to Cornerstone Research, the Settlement is more than four times the $20 million median settlement amount for cases resolved in the first half of 2026, where the median percentage of recovery was 5.4%. *See* Ex. 2 at 1, 6. The percentage of recovery also compares very favorably to the median recoveries in Exchange Act cases with similar-sized damages. In 10b-5 cases with total estimated damages (based on Cornerstone's methodology) ranging from $150 million to $249 million, median settlements in 2025 recovered 4.9% of estimated damages, and from 2016 to 2024 such median settlements recovered 6.9% of damages. *See* Laarni Bulan and Eric Tam, *Securities Class Action Settlements – 2025 Review and Analysis* (Cornerstone Research 2026), Ex. 5 at 7. For such cases with damages of $250 million to $499 million, median settlements in 2025 recovered 9.4% of total estimated damages, and from 2016 to 2024 such median settlements recovered 6% of damages. *Id*. For such cases with damages of $500 million to $999 million, median settlements in 2025 recovered 6.5% of total estimated damages, and from 2016 to 2024 such median settlements recovered 4.3% of damages. *Id*. For such cases with more than $1 billion in damages, median settlements in 2025 recovered 3% of total estimated damages, and from 2016 to 2024 such median settlements recovered 3.6% of damages. *Id*.

125. Accordingly, substantial barriers to establishing loss causation and damages remained in the case at the time the Settlement was reached and would have continued throughout summary judgment briefing, a potential trial, post-trial motions, and inevitable appeals.

D. Lead Plaintiffs Faced Additional Risk Due to Defendants' Vigorous Challenge to Class Certification

126. As noted above, class certification in this case was also contested. The Class Certification Motion was pending when the Parties agreed to settle. Defendants

opposed class certification on several grounds, including, for example, that Lead Plaintiffs could not establish price impact or reliably measure damages on a class wide basis. *See* ECF No. 185. Although Lead Plaintiffs were confident the motion would be granted, even if it were, Defendants undoubtedly would have sought to appeal and would have continued to contest the basis of certification at trial and in post-trial motions.

127. Defendants' class certification challenge centered on their attempt to "rebut the presumption" of reliance established in *Basic Inc. v. Levinson*, 485 U.S. 224 (1988) ("*Basic*"), to defeat certification by demonstrating that the misrepresentations did not actually affect, or impact, the market price of Everbridge's common stock. Specifically, Defendants relied on *Goldman I* and its "mismatch" framework to rebut the presumption of class-wide reliance established in *Basic*. As the Supreme Court explained in *Goldman I*, where plaintiffs rely on an indirect inference of price impact—*i.e.*, inferring that a back-end stock price decline after a corrective disclosure demonstrates that a front-end misstatement impacted the stock price—that inference "break[s] down" when there is a "mismatch between the contents of the misrepresentation and the corrective disclosure." *Id*. at 123.

128. Accordingly, Defendants argued that Lead Plaintiffs could not prove price impact because there was a "mismatch" between the contents of the alleged misstatements and the back-end alleged corrective disclosures. Specifically, regarding the integration statements in 2020 (¶¶139, 141), Defendants argued that neither alleged corrective disclosure addressed Everbridge's integration of NC4, Connexient, CNL, and One2Many—the companies it had acquired by that point—and, therefore, there was no price impact in connection with the first two alleged misstatements.

129. Therefore, Defendants also argued, at a minimum, that no Class Period should begin before April 6, 2021 (the date of the first xMatters revenue contribution statement). Had Defendants prevailed on their mismatch argument, the results would have significantly reduced the class's potential recovery. Under Defendants' proposed

class scenario where the Class Period would have started on April 6, 2021, estimated class wide damages would have dropped by more than 50% to approximately $648 million to $860 million, of which the Settlement recovers approximately 9.9% to 13.1%.

130. Further, Defendants argued no class should be certified at all because the remaining xMatters statements also lacked price impact. In particular, Defendants argued that the xMatters revenue contribution statements (¶¶144, 150) did not match the alleged corrective disclosures because the two corrective disclosures revealed nothing about xMatters' revenue in 2021. *See* ECF No. 185 at 8-9. With respect to the xMatters integration statements (¶¶154, 158, 159, 161, 163), Defendants argued that the two alleged corrective disclosures only revealed known information consistent with Defendants' prior disclosures that Everbridge had "a long way to go" and risk factors warning investors that integrations take time. *See id.* at 23-24.

131. Lead Plaintiffs would have vigorously opposed Defendants' mismatch arguments in their class certification reply. While Lead Plaintiffs believe their arguments would have prevailed and held through a judgment and on appeal, the *Goldman I* mismatch analysis is a relatively new and evolving area of law, and several post-*Goldman I* decisions in other circuits had granted defendants substantial relief on similar arguments.

132. Defendants also opposed class certification by arguing Lead Plaintiffs could not show that "damages are capable of measurement on a classwide basis" and in a manner "consistent with its liability case." *Comcast v. Behrend*, 569 U.S. 27, 33-35 (2013); *see also* ECF No. 185 at 25-26. If ultimately successful, Defendants' challenges under *Comcast* could have had devastating repercussions for class certification.

133. Given these issues, Defendants undoubtedly would have sought interlocutory appeal under Rule 23(f) if the Court had certified the class. A Rule 23(f) appeal could have delayed the litigation by years and created a risk of reversal.

Moreover, even if Lead Plaintiffs prevailed at class certification and on appeal, Defendants would likely continue to press the mismatch issue at summary judgment and trial, where the burden of proving loss causation shifts squarely to Lead Plaintiffs.

134. In light of these substantial risks, the $85 million Settlement represents a highly favorable result for the Settlement Class.

E. General Risks Involved in Prosecuting Securities Class Actions

135. In addition to the specific litigation risks summarized above, it is worth noting that securities class actions involve widely recognized and significant inherent risk. For example, many securities class actions have been dismissed at summary judgment. *See, e.g., In re Omnicom Grp., Inc. Sec. Litig.*, 541 F. Supp. 2d 546, 554-55 (S.D.N.Y. 2008), *aff'd*, 597 F.3d 501 (2d Cir. 2010); *In re Xerox Corp. Sec. Litig.*, 935 F. Supp. 2d 448, 496 (D. Conn. 2013), *aff'd*, *Dalberth v. Xerox Corp.*, 766 F.3d 172 (2d Cir. 2014). Indeed, on August 15, 2025, the Northern District in *Homyk v. ChemoCentryx, Inc.* granted defendants' motion for summary judgment and dismissed all claims just months prior to trial, finding that certain statements initially sustained by the court at the motion to dismiss stage were no longer actionable following the completion of fact and expert discovery. *See* 2025 WL 2505483 (N.D. Cal. Aug. 15, 2025).

136. Cases that have survived summary judgment have been dismissed before trial as a result of successful *Daubert* motions by defendants. For example, in *In re Pfizer Inc. Sec. Litig.*, the court granted the defendants' motion *in limine* to exclude the testimony of the plaintiffs' proffered damages expert, and then granted their renewed motion for summary judgment based on the plaintiffs' failure to proffer admissible loss causation and damages evidence. *See* 2014 WL 3291230 (S.D.N.Y. July 8, 2014), *vacated*, 819 F.3d 642 (2d Cir. 2016); *see also Bricklayers & Trowel Trades Int'l Pension Fund v. Credit Suisse First Boston*, 853 F. Supp. 2d 181 (D. Mass. 2012), *aff'd*, *Bricklayers & Trowel Trades Int'l Pension Fund v. Credit Suisse Sec. (USA) LLC,* 752 F.3d 82 (1st Cir. 2014) (granting summary judgment for defendants *sua*

sponte after finding that plaintiffs' event study was unreliable and that there was accordingly no evidence that the market reacted negatively to alleged corrective disclosures).

137. Even when securities class action plaintiffs are successful in obtaining class certification, prevail at summary judgment, overcome *Daubert* motions, and go to *trial*, there are still real risks on appeal of no recovery or substantially less recovery for class members. For example, in *In re BankAtlantic Bancorp, Inc.*, tried by Labaton, a jury rendered a verdict in plaintiffs' favor on liability in 2010. However, in 2011, the district court granted defendants' motion for judgment as a matter of law and entered judgment in favor of defendants on all claims. *See* 2011 WL 1585605 (S.D. Fla. Apr. 25, 2011). In 2012, the Eleventh Circuit affirmed the district court's ruling, finding that there was insufficient evidence to support a finding of loss causation. *See In re BankAtlantic Bancorp, Inc.*, 688 F.3d 713 (11th Cir. 2012).

138. Yet another example of the risk inherent in securities class actions is *Jaffe v. Household Int'l,* 2003 WL 21011757 (N.D. Ill. May 5, 2003), where a jury returned a verdict for plaintiffs in May 2009, and the district court (four years later) entered a post-verdict judgment of $2.45 billion. In 2015, however, the Seventh Circuit reversed and ordered a new trial on loss causation and damages. *See Glickenhaus & Co. v. Household Int'l Inc.*, 787 F.3d 408 (7th Cir. 2015); *see also, e.g., Robbins v. Koger Props., Inc.*, 116 F.3d 1441 (11th Cir. 1997) (jury verdict of $81 million for plaintiffs against an accounting firm reversed on appeal and judgment entered for defendant).

139. In light of all these obstacles and risks, the certain recovery of $85 million is a very favorable outcome for the Settlement Class.

VII. COMPLIANCE WITH THE PRELIMINARY APPROVAL ORDER AND REACTION OF THE SETTLEMENT CLASS TO DATE

140. As required by the Court's Preliminary Approval Order, Verita, working at Lead Counsel's direction, began disseminating notice of the Settlement on September 15, 2026. Ex. 4 at ¶¶3-7. Specifically, Verita has: (i) mailed by First-Class

Mail or emailed a copy of the Postcard Notice to potential Settlement Class Members using information gathered to date; (ii) mailed copies of the Postcard Notice in bulk to brokers and nominees that may have purchased Everbridge publicly traded common stock on behalf of Settlement Class Members ("Nominees"); (iii) published the Summary Notice in *The Wall Street Journal* and transmitted it over *PR Newswire*; and (iv) created a website, www.EverbridgeSecuritiesSettlement.com, to provide information about the Action and the Settlement. *Id*., ¶¶8-12.

141. Collectively, the notices provide important information about the Action and the Settlement, including, among other things, the definition of the Settlement Class, a description of the proposed Settlement, information regarding the claims asserted in the Action, Settlement Class Members' options in connection with the Settlement, and the deadlines for objecting, seeking exclusion, and submitting claims. *See generally id*., Ex. 4-A to C. The long-form Notice, available on the website or from Verita upon request, provides more detail about the Action and Settlement, including the Plan of Allocation. The notices also inform recipients of Lead Counsel's intention to apply for attorneys' fees in an amount not to exceed 28% of the Settlement Fund, and for payment of Litigation Expenses incurred by Lead Counsel in an amount not to exceed $675,000. *Id*.

142. In accordance with the Preliminary Approval Order, as of November 5, 2026, Verita has provided 84,394 copies of the Postcard Notice to potential Settlement Class Members and their Nominees (49,590 by mail and 34,804 by email). *Id*. at ¶9. In addition, Verita caused the Summary Notice to be published in *The Wall Street Journal* and transmitted over *PR Newswire* on September 29, 2026. *Id*. at ¶10.

143. In connection with the notice dissemination, Verita developed a website for the Settlement in order to provide information concerning the case and important dates and deadlines in connection with the Settlement, as well as access to an online claim portal and downloadable copies of the notices, Claim Form, Stipulation, Preliminary Approval Order, and other relevant documents. *Id*. at ¶¶12-13. Copies of

the Postcard Notice, long-form Notice, and Claim Form are also available on Lead Counsel's website, www.labaton.com. Additionally, Verita maintains a toll-free telephone number and email for inquiries regarding the Settlement. *Id*. at ¶11, Exs. A to C.

144. The deadline for Settlement Class Members to file an objection to the Settlement, the Plan of Allocation, and/or the Fee and Expense Application, or to request exclusion is November 25, 2026. To date, not a single objection to any aspect of the Settlement has been received. In addition, Verita has received no requests for exclusion. *Id*. at ¶¶14-15.

145. Lead Counsel will file reply papers on or before December 10, 2026 that will address any objections and report on requests for exclusion and claims received.

VIII. THE PLAN FOR ALLOCATING THE NET SETTLEMENT FUND TO THE SETTLEMENT CLASS IS FAIR, REASONABLE, AND ADEQUATE

146. In accordance with the Preliminary Approval Order, and as explained in the notices, Settlement Class Members who wish to participate in the distribution of the Net Settlement Fund (*i.e*., the Settlement Fund less: (i) any Taxes; (ii) any Notice and Administration Expenses; (iii) any Litigation Expenses awarded by the Court; (iv) any attorneys' fees awarded by the Court; and (v) any other costs or fees approved by the Court) must submit a valid Claim and all required supporting documentation to the Claims Administrator by mail or online at www.EverbridgeSecuritiesSettlement.com. As provided in the long-form Notice, the Net Settlement Fund will be distributed to Authorized Claimants in accordance with the plan for allocating the Net Settlement Fund approved by the Court. The plan of allocation proposed by Lead Plaintiffs (*i.e*., the "Plan of Allocation" or "Plan") is set forth on pages 12-15 of the long-form Notice. *See* Ex. 4-B.

147. The proposed Plan is designed to achieve an equitable and rational distribution of the Net Settlement Fund. However, calculations made pursuant to the Plan do not represent a formal damages analysis and are not intended to measure the

amounts that Settlement Class Members could recover after a trial. Lead Counsel developed the Plan in consultation with Lead Counsel's consulting damages expert, Chad Coffman. The Plan creates a framework for the equitable distribution of the Net Settlement Fund among Settlement Class Members who suffered economic losses as a result of Defendants' alleged violations of the federal securities laws set forth in the Operative Complaint, as opposed to economic losses caused by market or industry factors or unrelated Company specific factors. To this end, Lead Plaintiffs' damages expert calculated the estimated amount of alleged artificial inflation in the per-share price of Everbridge publicly traded common stock that was allegedly caused by Defendants' materially false and misleading statements and omissions.

148. The Plan of Allocation generally measures the amount of loss that a Settlement Class Member can claim for purposes of making *pro rata* allocations of the Net Settlement Fund to Authorized Claimants. For losses to be compensable damages under the federal securities laws, the disclosure of the allegedly misrepresented information must be the cause of the decline in the price of the securities at issue. In this case, Lead Plaintiffs allege that Defendants issued false statements or omitted material facts during the Class Period that allegedly artificially inflated the price of Everbridge common stock. It is alleged that corrective information released to the market after market close on December 9, 2021 and February 24, 2022, negatively impacted the market price of Everbridge common stock on December 10, 2021 and on February 25, 2022 in a statistically significant manner and removed alleged artificial inflation from the prices of Everbridge publicly traded common stock on those days. Accordingly, in order to have a compensable loss for purposes of this Settlement, Everbridge publicly traded common stock must have been purchased during the period from February 18, 2020 through February 24, 2022, inclusive, and been held through at least one of the alleged corrective disclosure dates listed above. Ex. 4-B at ¶69.

149. Once Verita has processed all submitted Claim Forms and provided Claimants with an opportunity to cure any deficiencies in their claims or challenge the

rejection of their claims, processed responses, and made claim determinations, distributions will be made to Authorized Claimants. Verita will determine each Authorized Claimant's *pro rata* share of the Net Settlement Fund by dividing the Authorized Claimant's Recognized Claim (*i.e.*, the sum of the Claimant's Recognized Loss Amounts for each purchase as calculated under the Plan) by the total Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Net Settlement Fund. Lead Plaintiffs' losses will be calculated in the same manner. Payments of $10.00 and greater will be made in the form of checks and wire transfers. (Payments of less than $10.00 will not be made, given the costs associated with such distributions and low rates of negotiation.)

150. As set forth in the Plan, if there is any balance remaining in the Net Settlement Fund (whether by reason of uncashed checks, or otherwise), after at least six (6) months after the initial distribution, and after payment of any unpaid fees and expenses incurred in administering the Settlement, and Taxes, the Claims Administrator will, if feasible and economical, redistribute such balance among Authorized Claimants who have cashed their initial distribution checks in an economic fashion. Redistributions will be repeated until it is determined that redistribution of the funds remaining in the Net Settlement Fund would no longer be feasible and economical. Thereafter, any remaining balance will be donated to Consumer Federation of America, a non-profit, non-sectarian organization, or such other organization approved by the Court. *See* Stip. ¶ 27; Ex. 4-B at ¶82.[9] Lead Plaintiffs and Lead Counsel do not have a relationship with CFA.

[9] CFA is a non-profit, consumer advocacy organization established in 1968 to advance consumer interests through policy research, advocacy, and education. *See* www.consumerfed.org. With respect to victims of financial fraud, CFA has an Investor Protection program and an Investment Research Center that works nationwide to promote consumer-oriented policies that safeguard investors against fraud through: (i) developing educational material for investors; (ii) drafting policies and legislation; (iii) and providing testimony and comments on legislation and regulations. www.consumerfed.org/issues/investor-protection.

151. The structure of the Plan is similar to that of plans of allocation that have been used in numerous other securities class actions. To date, no objections to the Plan have been filed. In sum, Lead Counsel believes that the Plan provides a fair and reasonable method to equitably distribute the Net Settlement Fund among Authorized Claimants, and respectfully submits that the Plan should be approved by the Court.

IX. THE FEE AND EXPENSE APPLICATION

152. In addition to seeking final approval of the Settlement and approval of the Plan of Allocation, Lead Counsel, on behalf of Plaintiffs' Counsel, is applying to the Court for an award of attorneys' fees and payment of expenses incurred during the course of the Action.[10] Specifically, Lead Counsel is applying for attorneys' fees in the amount of 25% of the Settlement Amount, net of awarded Litigation Expenses and administration costs incurred to date, plus interest earned at the same rate as earned by the Settlement Fund, and for Litigation Expenses in the amount of $454,026.11, plus accrued interest.[11] Lead Counsel also seeks reimbursement in the amount of $25,000 to Lead Plaintiffs and $7,535.32 to Central Laborers for their costs (including lost wages) incurred in connection with their efforts on behalf of the Settlement Class in accordance with the PSLRA, 15 U.S.C. §78u-4(a)(4). *See* Ex. 1 at ¶¶4-5, 10-12; Ex. 3 at ¶¶3-9, 16-18. Lead Counsel's Fee and Expense Application is consistent with the amounts set forth in the notices and, to date, not one objection regarding the maximum fee and expense amounts set forth in the notice has been received.

[10] Any determination with respect to Lead Counsel's application for an award of attorneys' fees and Litigation Expenses will not affect the Settlement, if approved.

[11] The time and expense detail for Plaintiffs' Counsel is set forth in the Declaration of Michael H. Rogers on behalf of Labaton Keller Sucharow LLP ("Labaton Fee and Expense Decl."), attached hereto as Exhibit 6, and the Declaration of Ryan A. Llorens on behalf of Robbins Geller Rudman & Dowd LLP ("Robbins Fee and Expense Decl."), attached hereto as Exhibit 7. The declarations set forth the names of the attorneys and professional support staff members who worked on the Action, their hourly rates, the lodestar value of the time expended by such attorneys and professional support staff (and types of work conducted), the expenses incurred, and the background and experience of the firms.

153. Below is a summary of the primary factual bases for Lead Counsel's Fee and Expense Application. A full analysis of the factors considered by courts in the Ninth Circuit when evaluating requests for attorneys' fees and expenses from a common fund, as well as the supporting legal authority, is presented in the accompanying Fee and Expense Memorandum.

A. The Fee Request Is Fair and Reasonable and Warrants Approval

1. The Result Achieved

154. Here, the Settlement provides for a recovery of $85,000,000 in cash for the benefit of the Settlement Class. For the reasons set forth above and given the challenges and obstacles in this case, Lead Counsel believes that the Settlement represents an excellent result for the Settlement Class.

155. This recovery falls well-above industry trends. As discussed above, according to Cornerstone Research, the Settlement is four times the $20 million median settlement in the first half of 2026. Ex. 2 at 1. The Settlement recovers approximately 4.8% to 6.2% of maximum estimated damages and approximately 5.3% to 6.6% of maximum estimated damages with disaggregation factored in. For 10b-5 cases with total estimated damages of more than $1 billion, median settlements in 2025 recovered 3% of total estimated damages, and from 2016 to 2024 such median settlements recovered 3.6% of damages. Ex. 5 at 7.

156. Here, as a result of the Settlement, thousands of Settlement Class Members will benefit and receive compensation for their losses and avoid the substantial risks of a lesser, or no, recovery in the absence of settlement.

2. The Risks of Litigation and the Contingent Nature of the Fee

157. The risks faced by Plaintiffs' Counsel in prosecuting this Action are highly relevant to the Court's consideration of an award of attorneys' fees, as well as its approval of the Settlement. Here, Defendants adamantly deny any liability and, if

the Action had continued, would have aggressively litigated their defenses through dispositive motions, a complex trial, and the appeals that would inevitably follow. As detailed in Section VI. above, notwithstanding that certain claims survived Defendants' Motions to Dismiss, Plaintiffs' Counsel and Lead Plaintiffs faced significant risks with respect to obtaining class certification, surviving summary judgment challenges and actually proving Defendants' liability and damages at each of the future stages of the litigation.

158. These case-specific litigation risks are in addition to the risks accompanying securities litigation generally, such as the fact that this Action is governed by stringent case law interpreting the federal securities laws and was undertaken on a contingent-fee basis. From the outset, Lead Counsel understood that this would be a complex, expensive, and potentially lengthy litigation with no guarantee of ever being compensated for the substantial investment of time and financial expenditures that vigorous prosecution of the case would require. In undertaking that responsibility, Lead Counsel was obligated to ensure that sufficient resources (in terms of attorney and support-staff time) were dedicated to prosecuting the Action, and that funds were available to compensate vendors and consultants and to cover the considerable out-of-pocket costs that a case like this typically demands. With an average lag time of several years for these cases to conclude, the financial burden on contingent-fee counsel is far greater than on a firm that is paid on an hourly, ongoing basis. Counsel have dedicated more than 17,000 hours to prosecuting the Action for the benefit of the Settlement Class yet have received no compensation for their efforts.

159. Plaintiffs' Counsel also bore the risk that no recovery would be achieved. Lead Counsel is aware that despite the most vigorous and competent efforts, a law firm's success in contingent litigation such as this is never guaranteed. Moreover, it takes hard work and diligence by skilled counsel to develop the facts and theories that are needed to sustain a complaint or win at trial, or to persuade sophisticated defendants

to engage in serious settlement negotiations at meaningful levels. As mentioned above, Lead Counsel is aware of many hard-fought lawsuits in which, because of the discovery of facts unknown when the case commenced, or changes in the law during the pendency of the case, or a decision of a judge or jury following a trial on the merits, excellent professional efforts by a plaintiff's counsel produced no fee for counsel.

160. Successfully opposing a motion to dismiss or even for summary judgment is also not a guarantee that plaintiffs will prevail at trial. While only a few securities class actions have been tried before a jury, several have been lost in their entirety, such as *In re JDS Uniphase Sec. Litig.*, No. 02-cv-1486, slip op. (N.D. Cal. Nov. 27, 2007) (tried by Labaton), and *In re Tesla, Inc. Sec. Litig.*, No. 18-cv-4865, slip op. (N.D. Cal. Feb. 3, 2023), or substantially lost as to the main case, such as *In re Clarent Corp. Sec. Litig.*, No. 01-cv-3361, slip op. (N.D. Cal. Feb. 16, 2005).[12]

161. Even plaintiffs who succeed at trial may find their verdict overturned by a post-trial motion for a directed verdict or on appeal. *See, e.g.*, *Ward v. Succession of Freeman*, 854 F.2d 780 (5th Cir. 1988) (reversing plaintiffs' jury verdict for securities fraud); *Anixter v. Home-Stake Prod. Co.*, 77 F.3d 1215 (10th Cir. 1996) (overturning plaintiffs' verdict obtained after two decades of litigation); *Glickenhaus & Co. v. Household Int'l, Inc.*, 787 F.3d 408 (7th Cir. 2015) (reversing and remanding jury verdict of $2.45 billion after 13 years of litigation on loss causation grounds and error in jury instruction under *Janus Cap. Grp., Inc. v. First Derivative Traders*, 564 U.S. 135 (2011)); *Robbins v. Koger Props., Inc.*, 116 F.3d 1441 (11th Cir. 1997) (reversing $81 million jury verdict and dismissing case with prejudice). And, the path to maintaining a favorable jury verdict can be arduous and time consuming. *See, e.g.*, *In re Apollo Grp., Inc. Sec. Litig.*, 2008 WL 3072731 (D. Ariz. Aug. 4, 2008), *rev'd*, 2010 WL 5927988 (9th Cir. June 23, 2010) (unanimous verdict for plaintiffs rejected by trial court and later reinstated by the Ninth Circuit Court of Appeals).

[12] A compendium of unreported decisions is attached hereto as Exhibit 8.

162. The United States Supreme Court and numerous other courts have repeatedly recognized that the public has a strong interest in having experienced and able counsel enforce the federal securities laws through private actions. *See, e.g.*, *Bateman Eichler, Hill Richards, Inc. v. Berner*, 472 U.S. 299, 310 (1985) (Private securities actions provide "'a most effective weapon in the enforcement' of the securities laws and are a 'necessary supplement to [SEC] action.'") (citations omitted). Vigorous private enforcement of the federal securities laws can only occur if private investors can obtain some parity in representation with that available to large corporate defendants. If this important public policy is to be carried out, courts should award fees that adequately compensate plaintiffs' counsel, taking into account the risks undertaken in prosecuting a securities class action as well as the economics involved.

163. Plaintiffs' Counsel's efforts, in the face of substantial risks and uncertainties, have resulted in what Lead Counsel believes is a significant (and certain) recovery for the Settlement Class. In these circumstances, and in consideration of their hard work and the excellent result achieved, Lead Counsel believes the 25% fee request is fair and reasonable and should be approved.

3. The Skill Required and Quality of Counsel's Representation

164. The skill and diligence of Lead Counsel also support the requested fee. As demonstrated by the firm biography included as Exhibit F to the Labaton Fee and Expense Declaration, Lead Counsel is among the most experienced and skilled law firms in the securities litigation field, with a long and successful track record representing investors in such cases, and is consistently ranked among the top plaintiffs' firms in the country.

165. The quality of the work performed in obtaining the Settlement should also be evaluated in light of the quality of opposing counsel. Defendants in this case were represented by experienced counsel at Kirkland & Ellis LLP that vigorously and ably defended the Action on behalf of Defendants.

4. The Time and Labor Devoted to the Action

166. As more fully described above, Lead Counsel, with the assistance of Robbins Geller: (i) engaged in a thorough pre-discovery investigation; (ii) drafted detailed amended complaints; (iii) opposed two motions to dismiss; (iv) successfully appealed certain claims dismissed by the Court; (v) moved for class certification; (vi) obtained and analyzed more than 207,100 documents (1,083,000 pages) produced by Defendants and third parties; (vii) produced documents and deposition witnesses in response to discovery propounded by Defendants; (viii) engaged experts in post-acquisition accounting, damages, market efficiency, and loss causation. The Parties exchanged extensive mediation briefing and participated in a full-day mediation. *See supra* Sections III-V.

167. These efforts were driven and focused on advancing the litigation to achieve the most successful outcome for the Settlement Class, whether through settlement or trial, by the most efficient means possible. Throughout the litigation, Lead Counsel implemented effective project management and sought to maintain an appropriate level of staffing on all tasks.

168. The time devoted to this Action by Plaintiffs' Counsel is set forth in the Labaton Fee and Expense Declaration, Exhibit 6 hereto, and the Robbins Geller Fee and Expense Declaration, Exhibit 7 hereto. Included with the declarations are schedules that summarize the time expended by the attorneys and professional support staff at the firms, as well as expenses ("Fee and Expense Schedules"). *See also* Exhibit 9 (Summary Table of Lodestars and Expenses). The Fee and Expense Schedules report each person's resulting "lodestar," *i.e.*, their hours multiplied by their hourly rates, and their time broken down into different categories of work, as required by the Court.

169. Over the course of the Litigation, the hourly rates of Plaintiffs' Counsel here ranged from $875 to $1,600 per hour for partners, $475 to $1,025 per hour for of counsels, $275 to $700 for associates, $405 to $550 for staff attorneys, and $375 to $455 for paralegals. *See* Exs. 6-A & C, 7-A & C. These hourly rates are reasonable for

this type of complex litigation. Exhibit 10, attached hereto, is a table of hourly rates for defense firms compiled by Lead Counsel from fee applications submitted by such firms nationwide in bankruptcy proceedings in 2025. The analysis shows that across all types of attorneys, Plaintiffs' Counsel's hourly rates here are consistent with, or lower than, those of the firms surveyed.

170. In total, Plaintiffs' Counsel have expended 17,047.5 hours on the investigation, prosecution, and resolution of the claims against Defendants representing a total lodestar of $10,607,647.50 at current rates and $9,980,120.50 at historical rates.[13] *See, e.g.,* Ex. 9. Thus, pursuant to a lodestar "cross-check," Lead Counsel's fee request of 25% of the gross Settlement Amount (or $21,250,000, plus interest), if awarded, would yield a reasonable multiplier of approximately 2.0 and 2.13, respectively,[14] on Plaintiffs' Counsel's lodestar, which is within the range of fee multipliers awarded in comparable securities class actions and in other class actions involving significant contingency fee risk, in this Circuit and elsewhere. *See* Fee and Expense Memorandum, §I.E.

5. Lead Plaintiffs' Endorsement of the Fee Application

171. Lead Plaintiffs have closely monitored and actively participated in the prosecution and settlement of the Action and have evaluated and fully support Lead Counsel's fee request. As set forth in their declaration, Lead Plaintiffs have concluded that the requested fee has been earned based on the efforts of Plaintiffs' Counsel and the excellent recovery obtained for the Settlement Class in a difficult and challenging case. Ex. 1, ¶8. Accordingly, Lead Plaintiffs' endorsement of the fee request further

[13] Plaintiffs' Counsel will continue to perform legal work on behalf of the Settlement Class should the Court approve the Settlement. Additional resources will be expended assisting Settlement Class Members with their Claim Forms and related inquiries and working with the Claims Administrator to ensure the smooth progression of claims processing. No additional legal fees will be sought for this work.

[14] The multiplier on 25% of the net Settlement Amount after the deduction of litigation expenses and PSLRA awards would be a reasonable 2.0 at current rates and 2.12 at historical rates. This figure will be updated in Lead Counsel's December 10 reply papers to also deduct incurred administration costs, which can be calculated after the deadline for claims passes.

demonstrates its reasonableness, and this endorsement should be given meaningful weight in the Court's consideration of the fee award.

172. Central Laborers also supports the fee request. Ex. 3, ¶13.

B. The Request for Litigation Expenses Warrants Approval

1. Plaintiffs' Counsel Seek Payment of Reasonable and Necessary Litigation Expenses from the Settlement Fund

173. Lead Counsel, on behalf of itself and Robbins Geller, seeks payment from the Settlement Fund of $454,026.11 for expenses that were reasonably and necessarily incurred in connection with the Action. The Postcard Notice and long-form notice inform the Settlement Class that Lead Counsel would be applying for payment of Litigation Expenses in an amount not to exceed $675,000, which may include a request for reimbursement of the reasonable costs and expenses (including lost wages) incurred by Plaintiffs directly related to their efforts on behalf of the Settlement Class in accordance with 15 U.S.C. §78u-4(a)(4). The amount of Litigation Expenses requested by Lead Counsel, along with the amounts requested by Plaintiffs, is below the maximum set forth in the notices.

174. Plaintiffs' Counsel's expenses are detailed in the Labaton Fee and Expense Declaration and the Robbins Geller Fee and Expense Declaration. *See* Exs. 6-D & E; 7-D. As explained, the expenses incurred are reflected on the books and records maintained by the firms. These books and records were prepared from expense vouchers, check records, and other source materials, and are an accurate record of the expenses incurred.

175. From the inception of the Action, Lead Counsel was aware that Plaintiffs' Counsel might not recover any of the expenses incurred in prosecuting the claims against Defendants and, at a minimum, would not recover any expenses until the Action was successfully resolved. Lead Counsel also understood that, even if the Action was ultimately successful, an award of expenses would not compensate counsel for the lost use or opportunity costs of funds advanced to prosecute the claims against Defendants.

Thus, we were motivated to take steps to manage expenses without jeopardizing the vigorous and efficient prosecution of the case. Labaton maintained control over the main expenses in the Action by creating a joint litigation expense fund ("Litigation Expense Fund" or "Litigation Fund"). Labaton and Robbins Geller collectively contributed $168,025.03 to the Litigation Expense Fund, which incurred $257,015.77 in expenses. A description of the expenses incurred by the Litigation Fund by category is included in the Labaton Fee and Expense Decl., Ex. 6 at ¶8 and Ex. E thereto. The Litigation Fund has an outstanding balance in the amount of $88,990.74. Upon the Court's approval, this balance will be paid by Labaton and Labaton is seeking this amount in its expense request. *See* Ex. 6-D.

176. Plaintiffs' Counsel's expenses include fees and costs for, among other things: (i) experts in connection with various stages of the litigation; (ii) mediation; (iii) counsel for the CWs in the case; (iv) litigation support related to electronic discovery; (v) transcript and deposition-related expenses; (vi) work-related travel; and (vii) online factual and legal research. Courts have consistently found that these types of expenses are payable from a fund recovered by counsel for the benefit of a class.

177. The largest component of Plaintiffs' Counsel's expenses (*i.e.*, $210,970.75 or approximately 46% of total expenses) was incurred for experts. As noted above, Lead Counsel retained experts to provide opinion on issues related to the elements of the claims (post-acquisition accounting, damages, market efficiency, and loss causation) and Defendants' defenses (negative causation, materiality, and falsity), and in connection with class certification. These experts were essential to the prosecution of the Action. *See* Ex. 6 at ¶¶6(b), 8(a)-D & E.

178. Another primary component of the expenses ($71,874.51 or approximately 16% of the total) was for document management and hosting related to electronic discovery. Lead Counsel retained third-party vendors to process and host documents produced in the Action. *See* Ex. 6 at ¶¶6(e), 8(d)-D & E. Lead Counsel used these vendors and the Relativity Database to, among other things: (i) maintain

potentially relevant documents collected from Lead Plaintiffs for review and production in response to Defendants' discovery demands; (ii) maintain the approximately 207,100 documents (1,083,000 pages) produced by Defendants and third parties; (iii) process documents so that they would be in a searchable format; and (iv) apply data analysis tools to focus the review on the most significant documents to efficiently target information counsel needed to support their allegations.

179. Lead Plaintiffs' share of the fees of the Mediator in connection with the mediation process totaled $51,137.50 or 11% of the total expenses. Ex. 6 at ¶8(b).

180. Another component of counsel's Litigation Expenses ($7,196.19) was the cost of court reporters, videographers, and transcripts in connection with the four depositions and the hearings before the Court. Exs. 6 at ¶¶6(d), 8(c)-D & E; 7 at ¶6(b)-D.

181. Lead Counsel retained counsel for former employees who may have been witnesses, in connection with discovery requests ($6,530.00). Ex. 6 at ¶¶6(c)-D & E.

182. the litigation expenses also include approximately $45,663.96 for work-related transportation expenses, meals, and lodging related to, among other things, traveling in connection with court hearings, the depositions, working late hours, and the mediation. (Any first-class airfare has been reduced to be comparable to economy rates.) Exs. 6 at ¶6(f)-D; 7 at ¶6(c)-D.

183. The other expenses for which Plaintiffs' Counsel seek payment are the types of expenses that are necessarily incurred in complex commercial litigation and routinely paid in non-contingent cases. These expenses include, among others, online legal and factual research, court and service fees, duplicating costs, and overnight delivery expenses. All of the Litigation Expenses incurred by Plaintiffs' Counsel were reasonable and necessary for the successful litigation of the Action.

2. PSLRA Reimbursement to Lead Plaintiffs and Central Laborers Would Be Fair and Reasonable

184. The PSLRA specifically provides that an "award of reasonable costs and expenses (including lost wages) directly relating to the representation of the class" may be made to "any representative party serving on behalf of a class." 15 U.S.C. §78u-4(a)(4). Accordingly, Lead Plaintiffs seek reimbursement of $25,000 and proposed additional class representative Central Laborers seeks reimbursement of $7,535.32 for the cost of the time they incurred in connection with their efforts on behalf of the Settlement Class. Ex. 1 at ¶¶4-5, 10-12; Ex. 3 at ¶¶3-9, 16-18.

185. The Sylebra Funds were active participants in the litigation efforts. For instance, the initial complaint was supported by an independent investigation by the Sylebra Funds, including the identification of and discussions with a key confidential witness. Lead Plaintiffs and Central Laborers were both deposed and participated in other discovery, including producing documents and sworn interrogatory responses. Lead Plaintiffs and Central Laborers were in regular contact with counsel, reviewed court filings and submitted declarations in support of motions, and consulted with counsel during the course of the lengthy mediation process and approved of the Settlement. *Id*. Lead Plaintiffs' and Central Laborers' efforts required them to devote time and resources to this Action that would otherwise have been devoted to their core operations. Sylebra Funds are hedge funds and time re-directed from their core business is a cost to the Sylebra Funds. Ex. 1 at ¶¶4, 12. Central Laborers is a Taft-Hartley Fund, and the time that their representatives devoted to this case was time they would have otherwise devoted to the other work for the fund and thus represented a cost. Ex. 3 at ¶¶3, 17-18.

186. As discussed in the Fee and Expense Memorandum and in Plaintiffs' supporting declarations, Plaintiffs have been fully committed to pursuing the Settlement Class's claims. Plaintiffs provided valuable assistance to Lead Counsel during the prosecution and resolution of the Action. The efforts expended by Plaintiffs

during the course of this Action, as set forth in their declarations, including communicating with counsel, reviewing pleadings and motion papers, responding to discovery requests, preparing for depositions and being deposed, and communicating with counsel regarding the mediation and settlement negotiations, are precisely the types of activities courts have found to support reimbursement to representatives, and fully support the request for reimbursement here.

CONCLUSION

187. For all the reasons set forth above, Lead Counsel respectfully submits that the Settlement and the Plan of Allocation should be approved as fair, reasonable, and adequate. Lead Counsel further submits that the requested fee in the amount of 25% of the Settlement Amount, net of Litigation Expenses and administration costs incurred to date, should be approved as fair and reasonable, and the requests for payment of Litigation Expenses in the amount of $454,026.11, plus interest, and reimbursement of Plaintiffs' costs in the aggregate amount of $32,535.32, pursuant to the PSLRA, should also be approved.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed in New York, New York this 10th day of November, 2026.

MICHAEL H. ROGERS

Exhibit 1

LABATON KELLER SUCHAROW LLP
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Counsel for Lead Plaintiffs and Proposed Class Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, et. al., Individually and on Behalf of All Others Similarly Situated, Plaintiffs, vs. EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON et al., Defendants.	Case No. 2:22-cv-2249-FWS-RAO CLASS ACTION **DECLARATION OF SYLEBRA FUNDS IN SUPPORT OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION AND LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES** Date: December 17, 2026 Time: 10:00 a.m. Courtroom: 10D Judge: Hon. Fred W. Slaughter

I, Daniel Gibson, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. Sylebra Capital Partners Master Fund Ltd., Sylebra Capital Parc Master Fund, and Sylebra Capital Menlo Master Fund ("Sylebra Funds" or "Lead Plaintiffs")

are serving as court-appointed Lead Plaintiffs in the above-captioned securities class action.[1] I am fully authorized to enter into and execute this Declaration on behalf of the Sylebra Funds.

2. This Declaration is respectfully submitted on behalf of the Sylebra Funds in support of (a) the motion for final approval of class action settlement and plan of allocation and (b) Lead Counsel's motion for an award of attorneys' fees and expenses, which includes Sylebra Funds' application for reimbursement of costs and expenses pursuant to the Private Securities Li2tigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. § 78u-4(a)(4).

3. I have knowledge of the matters related to Sylebra Funds' application and of the other matters set forth in this Declaration as I, and others who work with me, have been directly involved in overseeing and participating in the prosecution of the Action, and I could and would testify competently thereto.

Work Performed by Sylebra Funds on Behalf of the Settlement Class

4. It is understood that the PSLRA was intended to encourage institutional investors to seek to manage and direct securities class actions. Sylebra Funds are hedge funds managed by Sylebra Capital Ltd., an investment adviser that targets mid-sized technology, media, and telecommunications companies. Together, Sylebra Funds have over $2.8 billion in assets under management. In seeking appointment as lead plaintiffs in the case, Sylebra Funds understood their fiduciary duties to serve in the best interests of the class.

5. In their capacity as Lead Plaintiffs, Sylebra Funds, among other things: initiated the investigation which led to origin of this case by finding the primary confidential witness in the litigation (as well as conducting the first interview), oversaw the filings of the initial and amended complaints; reviewed and monitored

[1] All capitalized terms used herein that are not otherwise defined have the meanings provided in the Stipulation and Agreement of Settlement, dated as of August 10, 2026 (ECF No. 188-3) (the "Stipulation").

the progress of the litigation; regularly communicated with counsel concerning its prosecution; reviewed material filings in the case, such as pleadings, briefs, and court orders; responded to the discovery demands propounded by Defendants and worked with counsel to gather and produce documents and information responsive to the requests, ultimately producing approximately 15,000 documents (approximately 102,000 pages); prepared and sat for a deposition in connection with class certification; and analyzed and responded to Defendants' settlement proposals over the course of the mediation efforts, including ultimately authorizing the acceptance of the Settlement.

Sylebra Funds Endorse Approval of the Settlement

6. Sylebra Funds were briefed on, consulted about, and kept informed of the settlement negotiations and the mediation sessions before David M. Murphy of Phillips ADR Enterprises, which ultimately resulted in the proposed Settlement. Prior to and during the settlement negotiations and mediation process, Sylebra Funds conferred with counsel regarding the Parties' respective positions.

7. Based on their involvement throughout the prosecution and resolution of the Action, Sylebra Funds believe that the proposed Settlement is fair, reasonable, and adequate to the Settlement Class. Sylebra Funds believe that the proposed Settlement represents a substantial recovery for the Settlement Class, particularly in light of the significant risks of continuing the Action, and endorse approval of the Settlement by the Court.

Sylebra Funds Support Approval of the Fee and Expense Application

8. Sylebra Funds also believe that Lead Counsel's request for an award of attorneys' fees of 25% of the Settlement Fund is fair and reasonable. Sylebra Funds have evaluated the fee request in light of the extensive work performed, the risks and challenges in the Action, and the substantial recovery obtained for the Settlement Class. Sylebra Funds understand that counsel will also devote additional time in the future to administrating the Settlement and distributing the Net Settlement Fund.

9. Sylebra Funds further believe that Lead Counsel's request for payment of Litigation Expenses of no more than $675,000 is reasonable given that the costs and expenses in question were necessary for the successful prosecution and resolution of this case. Based on the foregoing, and consistent with their obligation to obtain the best result at the most efficient cost on behalf of the Settlement Class, Sylebra Funds fully support Lead Counsel's motion for attorneys' fees and payment of Litigation Expenses.

Sylebra Funds' Request for Reimbursement Pursuant to PSLRA

10. In addition, Sylebra Funds understand that reimbursement of a representative plaintiff's reasonable costs and expenses, including lost wages, is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). Consequently, in connection with Lead Counsel's request for Litigation Expenses, Sylebra Funds seek reimbursement as explained below.

11. Sylebra Funds investigated and brought this action on behalf of a class of shareholders that were harmed by Defendants' alleged fraud. Since Sylebra Funds' appointment as lead plaintiffs, Sylebra Funds have monitored the prosecution and resolution of the litigation and have consulted with counsel regularly throughout the course of the Action, reviewed substantive court filings and prepared various declarations in support, and discussed and responded to Defendants' discovery requests. Additionally, I prepared for and sat for a deposition on behalf of Sylebra Funds on April 27, 2026 in connection with class certification. Sylebra Funds also regularly corresponded with counsel in connection with the mediation process and were consulted on and briefed about the mediation process. Sylebra Funds ultimately authorized entry into the Settlement.

12. In total, I conservatively estimate that Sylebra Funds' employees dedicated at least 50 hours to the litigation of this Action over the course of the past four years. This time was time that was not spent attending to Sylebra Capital's usual business and, accordingly, represented a cost to Sylebra Capital and the Sylebra

Funds. Using a conservative hourly rate that is below my pro rata annual compensation and the compensation I pay my personnel, Sylebra Funds incurred costs of $25,000, for which they respectfully request reimbursement.

Conclusion

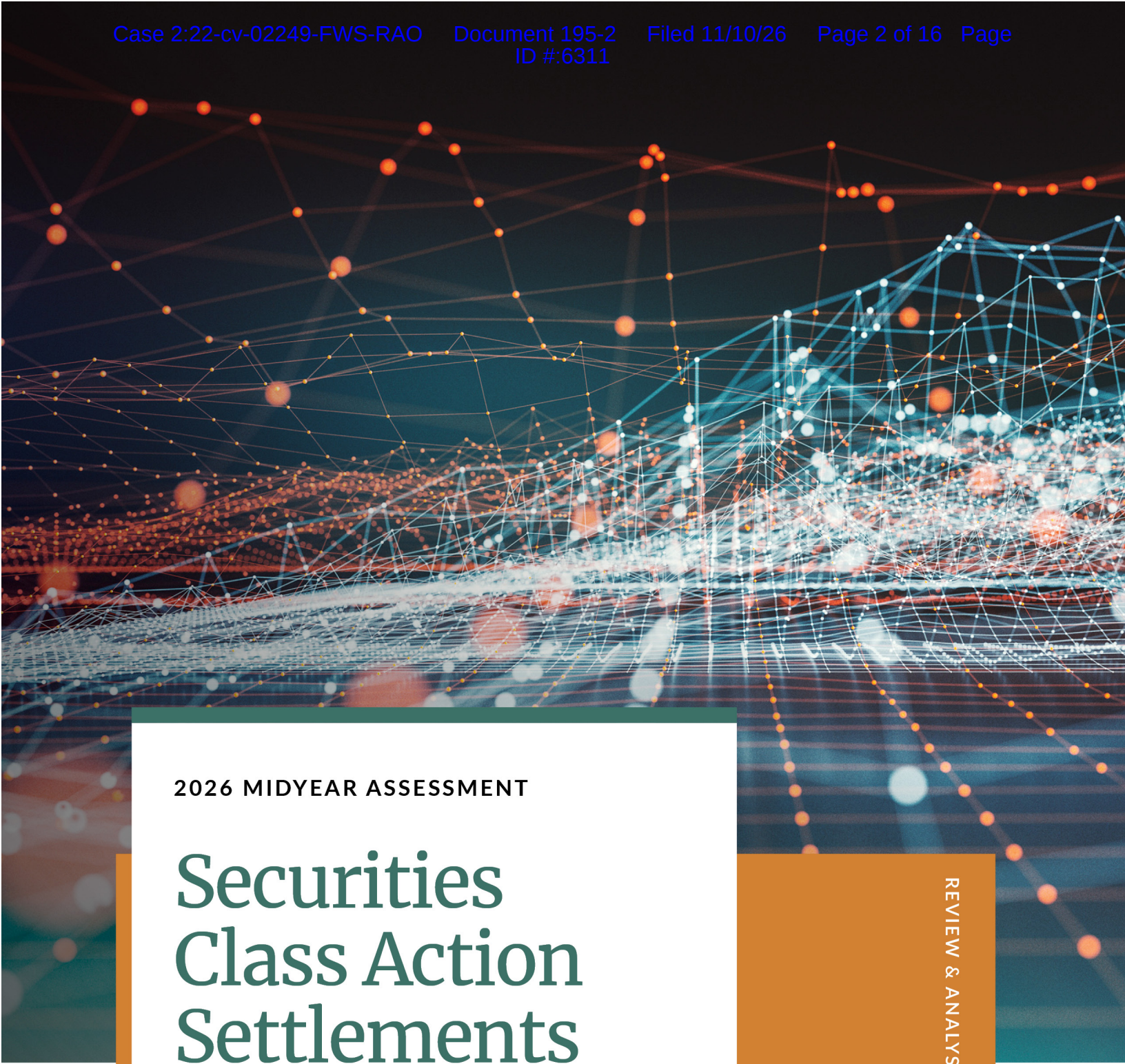
13. In conclusion, Sylebra Funds endorse the Settlement as fair, reasonable, and adequate, and believe it represents a very favorable recovery for the Settlement Class. Sylebra Funds further support Lead Counsel's attorneys' fee and Litigation Expense request and believe that it represents fair and reasonable compensation for counsel in light of the extensive work performed, the recovery obtained for the Settlement Class, and the attendant litigation risks. Finally, Sylebra Funds request reimbursement in the amount of $25,000 for the time they dedicated to this matter, pursuant to the PSLRA. Accordingly, Sylebra Funds respectfully request that the Court approve the motion for final approval of the proposed Settlement and the motion for an award of attorneys' fees and payment of Litigation Expenses.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 6, 2026.



DANIEL GIBSON
Chief Investment Officer
Sylebra Funds

Exhibit 2



2026 MIDYEAR ASSESSMENT

Securities Class Action Settlements

REVIEW & ANALYSIS

CORNERSTONE RESEARCH
Economic and Financial Consulting and Expert Testimony

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2026 Midyear Overview

In the first half of 2026, there were 39 securities class action settlements totaling $2.2 billion.

If the pace during 2026 H1 continues into the second half of the year, then 2026 will exceed 2025 in the number of cases settled and total settlement dollars, with the projected annual settlement dollars being the highest since 2020. For historical context, in eight of the past nine years, the number of settled cases in the second half of the year exceeded the number in the first half of the year. (page 2)

The 2026 H1 median settlement of $20.0 million was greater than the historical typical settlement size. The annual median settlement in the prior nine years ranged from $7.7 million to $17.6 million. (page 1)

There were four mega settlements (of $100 million or greater) accounting for 10% of 2026 H1 settled cases. (page 7)

In the first half of the year, Health Care was the most active industry sector with 14 settlements, followed by Industrials and Communication Services/Information Technology with seven and six settlements, respectively. These industries accounted for 27 of the 39 settlements (69%) in 2026 H1. (page 4)

Median plaintiff-style damages for 2026 H1 settlements with Section 10(b) claims[1] was $660 million, larger than the annual medians in the prior nine years.[2] Approximately 36% of these 2026 H1 settlements had plaintiff-style damages greater than $1.5 billion. By comparison, only 14% of settlements between 2017 and 2025 had plaintiff-style damages exceeding $1.5 billion. (page 5)

The median settlement as a percentage of plaintiff-style damages for the first half of the year was lower than eight of the past nine historical annual medians, consistent with the larger plaintiff-style damages observed in 2026 H1. (page 6)

Of settled cases with Section 10(b) claims in 2026 H1, 61% involved an accompanying derivative action, and an institutional investor served as lead or co-lead plaintiff in 61% of settlements. (page 7)

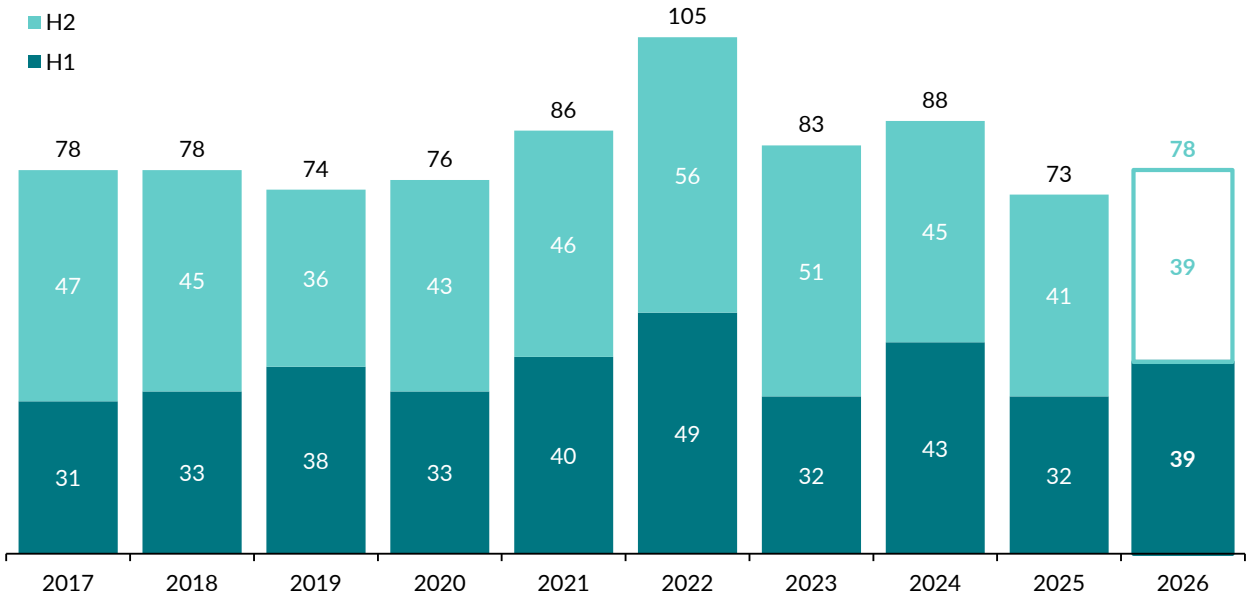
Figure 1: Settlement Statistics
(Dollars in millions)

	2017–2025	2025	2026 H1
Number of Settlements	741	73	39
Total Amount	$34,657.7	$3,082.5	$2,200.0
Minimum	$0.3	$0.3	$1.0
Median	$13.0	$17.6	$20.0
Average	$46.8	$42.2	$56.4
Maximum	$3,975.8	$447.7	$740.0

Note: Settlement dollars are adjusted for inflation; 2026 dollar–equivalent figures are presented.

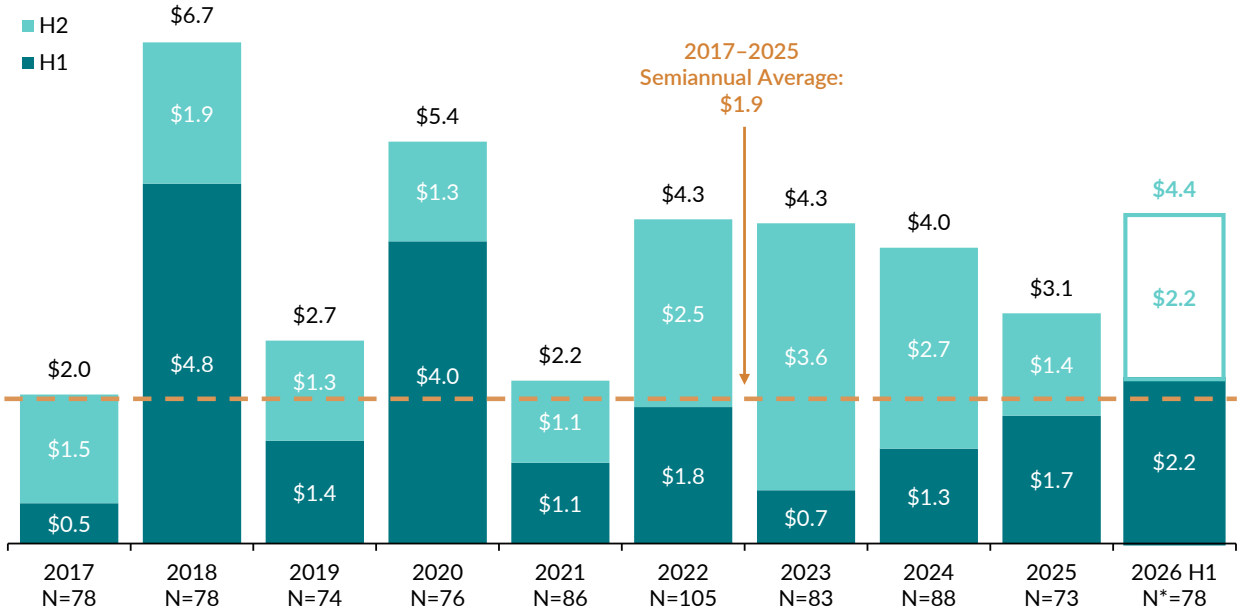
Number of Settlements and Settlement Size

Figure 2: Total Cases Settled
2017–2026 H1



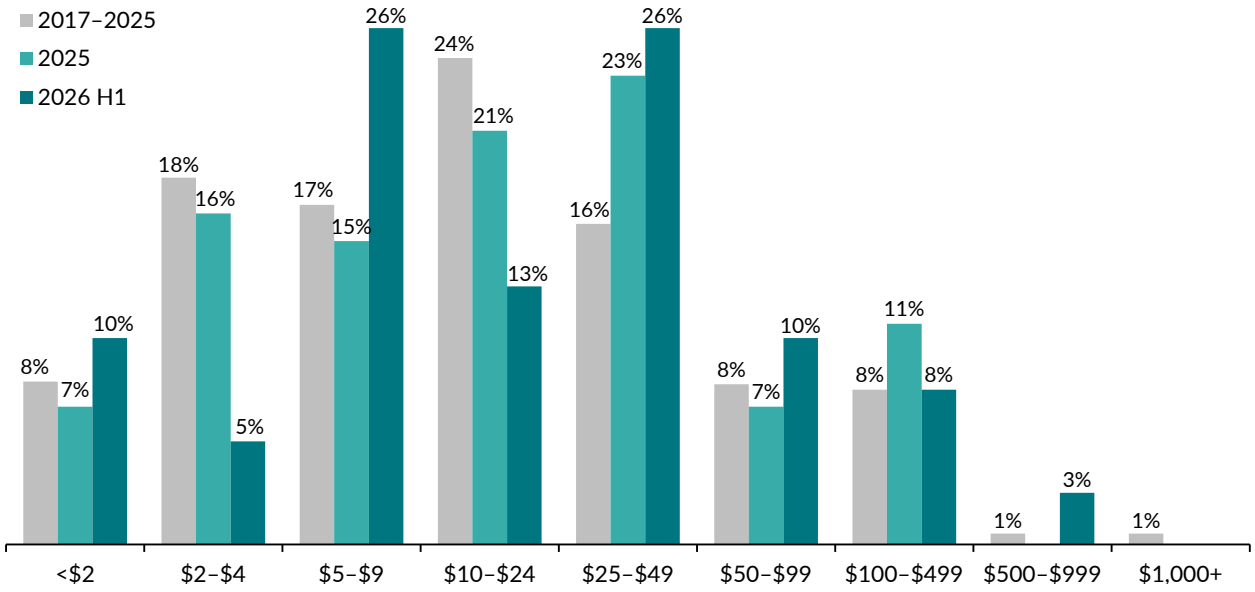
Note: 2026 total cases settled represents an annualized figure based on the number of 2026 H1 settlements.

Figure 3: Total Settlement Dollars
2017–2026 H1
(Dollars in billions)



Note: Settlement dollars are adjusted for inflation; 2026 dollar–equivalent figures are presented. "N" refers to the number of settlements. 2026 total settlement dollars and number of settlements represent annualized figures based on 2026 H1 settlement dollars and number of settlements.

Figure 4: Proportion of Settled Cases by Settlement Dollar Range
2017–2026 H1
(Dollars in millions)



Note: Percentages indicate the proportion of settled cases in the given settlement dollar range. Percentages may not sum to 100% due to rounding.

Industry Sectors

Figure 5: Number of Settlements by Half Year and Industry Sectors
2021 H1–2026 H1

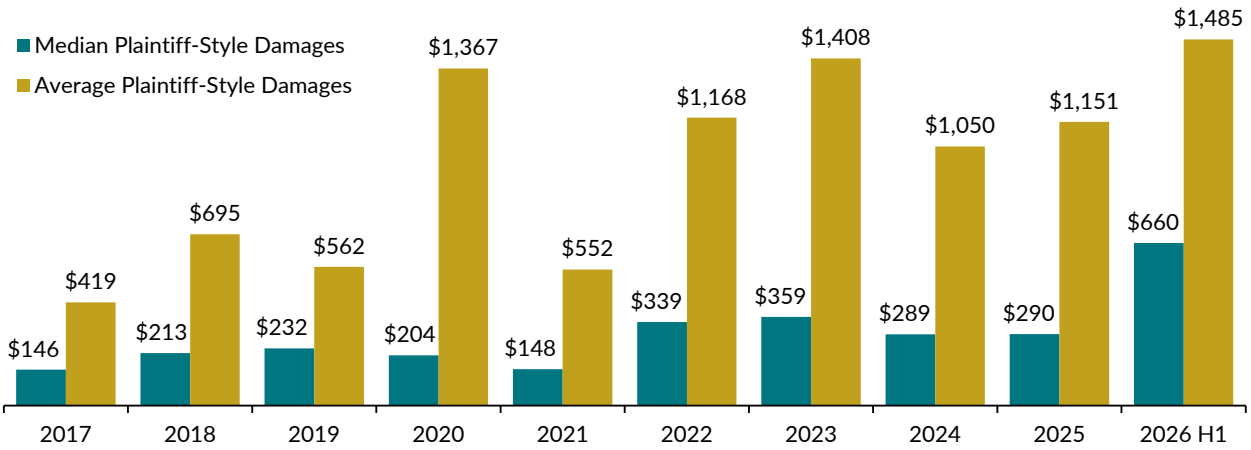
Industry	Communication Services/ Information Technology	Consumer Discretionary	Consumer Staples	Energy/ Materials	Financials/ Real Estate	Health Care	Industrials	Utilities
2021 H1	13	1	2	7	6	8	1	2
2021 H2	10	4	1	3	2	18	7	1
2022 H1	9	5	3	1	4	16	10	1
2022 H2	9	11	2	6	6	14	8	0
2023 H1	7	4	0	6	4	9	2	0
2023 H2	9	4	4	4	8	13	8	1
2024 H1	9	4	2	6	8	12	2	0
2024 H2	10	5	3	5	4	9	9	0
2025 H1	8	8	2	1	2	9	2	0
2025 H2	11	1	2	5	5	10	6	1
2026 H1	6	5	0	2	4	14	7	1
			0–2	3–7	8–12	13+		

Note: Industry sectors are based on the Global Industry Classification Standard (GICS).

Potential Investor Losses in Rule 10b-5 Cases

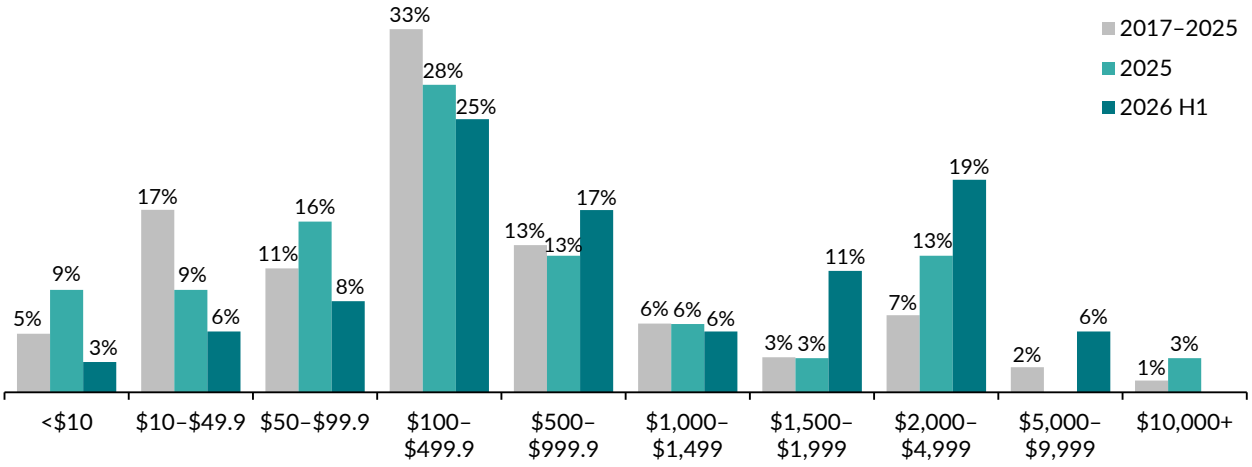
For cases with Rule 10b-5 claims, Cornerstone Research's analysis finds a proxy for potential investor losses—referred to here as plaintiff-style damages—to be the most important determinant of settlement outcomes based on regression analysis. However, plaintiff-style damages do not represent actual economic losses borne by shareholders. Determining any such economic losses for a given case requires more in-depth analysis.

Figure 6: Median and Average Plaintiff-Style Damages
2017–2026 H1, Settlements with Rule 10b-5 Claims
(Dollars in millions)



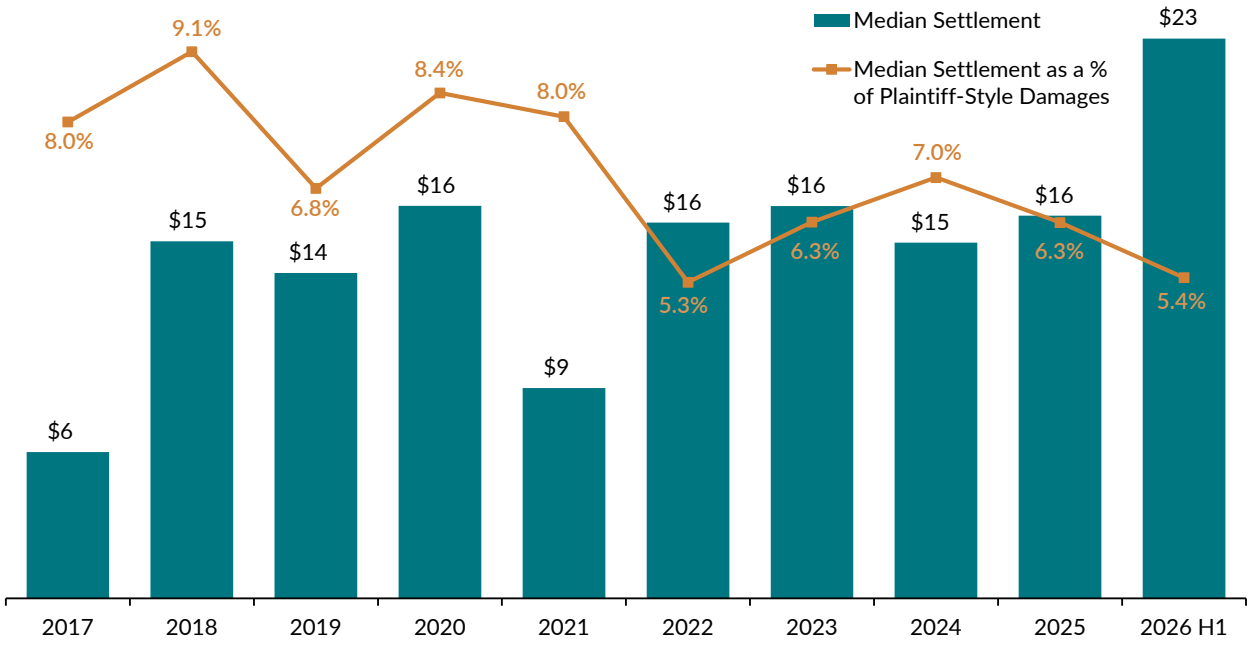
Note: Plaintiff-style damages are adjusted for inflation based on class period end dates and are estimated for common stock/ADR/ADS only; 2026 dollar–equivalent figures are presented. Plaintiff-style damages are estimated for cases that allege a claim under Rule 10b-5 (whether alone or in addition to other claims).

Figure 7: Proportion of Settled Cases by Plaintiff-Style Damages Range
2017–2026 H1, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: Plaintiff-style damages are adjusted for inflation based on class period end dates and are estimated for common stock/ADR/ADS only; 2026 dollar–equivalent figures are presented. Plaintiff-style damages are estimated for cases that allege a claim under Rule 10b-5 (whether alone or in addition to other claims).

Figure 8: Median Settlement and Settlement as a Percentage of Plaintiff-Style Damages
2017–2026 H1, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2026 dollar–equivalent figures are presented. Plaintiff-style damages are estimated for common stock/ADR/ADS only. Plaintiff-style damages are estimated for cases that allege a claim under Rule 10b-5 (whether alone or in addition to other claims).

Analysis of Settlement Characteristics

Figure 9: Percentage of Settled Cases with Selected Characteristics

	2017–2025		2025		2026 H1	
	Number	Percent	Number	Percent	Number	Percent
Claims						
Rule 10b-5 claims	653	88%	64	88%	36	92%
Only '33 Act claims	88	12%	9	12%	3	8%
Accounting Allegations						
GAAP violations	270	41%	29	41%	13	36%
Financial restatements	112	17%	9	14%	3	8%
Accounting irregularities	17	3%	1	2%	1	3%
Auditor codefendant	26	4%	1	2%	0	0%
Other Settlement Characteristics						
Mega settlements	55	7%	8	11%	4	10%
Parallel derivative action	335	51%	29	45%	22	61%
Institutional investor as lead or co-lead plaintiff	333	51%	29	45%	22	61%

Note: The analyses for accounting allegations and other settlement characteristics (except for mega settlements) are limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims). The two subcategories of accounting issues analyzed in this report are (1) restatements—cases involving a restatement (or announcement of a restatement) of financial statements, and (2) accounting irregularities—cases in which the defendant has reported the occurrence of accounting irregularities (intentional misstatements or omissions) in its financial statements. Parallel derivative actions include those cases where a derivative action with allegations similar to those included in the underlying class action complaint was filed.

Cornerstone Research's Settlement Analysis

This research examines the relationship between settlement outcomes and certain securities case characteristics. Regression analysis is employed to better understand the factors that inform case settlements given the characteristics of a particular securities class action.

DETERMINANTS OF SETTLEMENT OUTCOMES

Based on regression analysis, important determinants of settlement amounts include the following:

- Plaintiff-style damages
- The most recently reported total assets prior to the settlement hearing date for the defendant issuer
- Whether there were accounting irregularities
- Whether there were criminal charges against the issuer, officers, directors, or other defendants with allegations similar to those included in the underlying class action complaint
- Whether there was a derivative action with allegations similar to those included in the underlying class action complaint
- Whether, in addition to Rule 10b-5 claims, Section 11 claims were alleged and not dismissed prior to settlement
- Whether the issuer had been delisted from a major exchange and/or had declared bankruptcy
- Whether an institutional investor acted as lead or co-lead plaintiff
- Whether securities other than common stock/ADR/ADS were included in the alleged class

Cornerstone Research analyses show that, all else being equal, settlement amounts tended to be higher in cases involving larger plaintiff-style damages, greater issuer defendant total assets, or cases in which Section 11 claims were alleged in addition to Rule 10b-5 claims.

Settlement amounts also tended to be higher in cases that involved accounting irregularities, criminal charges, an accompanying derivative action, an institutional investor lead or co-lead plaintiff, or with securities in addition to common stock/ADR/ADS included in the alleged class.

Settlement amounts tended to be lower if the issuer had been delisted from a major exchange and/or had declared bankruptcy.

Collectively, the factors above explain approximately 75% of the variation in settlement outcomes.

Research Sample

The database compiled for this report is limited to cases that allege Rule 10b-5, Section 11, and/or Section 12(a)(2) claims brought by purchasers of a corporation's common stock.

Cases with alleged classes of only bondholders, preferred stockholders, etc.; cases that allege fraudulent deflation in price; and mergers and acquisitions cases are excluded. These criteria are imposed to ensure data availability and to utilize a relatively homogeneous set of cases in terms of the nature of the allegations.

The database includes over 2,380 securities class actions filed after passage of the Reform Act (1995) and settled from 1996 through 2026 H1. These securities class actions correspond to approximately $162.8 billion in total settlement dollars, adjusted for inflation and expressed in 2026 dollars. These settlements are identified based on a review of case activity collected by Securities Class Action Services LLC (SCAS).[3]

The designated settlement year, for purposes of this report, corresponds to the year in which the hearing to approve the settlement was held.[4] Cases involving multiple settlements are reflected in the year of the most recent partial settlement, provided certain conditions are met.[5]

In addition to SCAS, data sources include Bloomberg, the Center for Research in Security Prices (CRSP) at the University of Chicago Booth School of Business, LSEG Workspace, court filings and dockets, SEC registrant filings, SEC litigation releases and administrative proceedings, LexisNexis, Stanford Securities Litigation Analytics (SSLA), and public press.

Endnotes

1 For purposes of the settlement research and modeling, this report utilizes a measure of potential investor losses that allows for consistency across a large volume of cases, thus enabling the identification and analysis of potential trends. This measure, "settlement model plaintiff-style damages" ("plaintiff-style damages" as referred to in this report), is estimated using a methodology that closely aligns with approaches used by plaintiffs in the current securities class action litigation environment. For example, when estimating the number of shares eligible for damages, the plaintiff-style damages approach adjusts for short interest positions and shares estimated to be held by institutional investors throughout the entire class period.

2 Plaintiff-style damages are calculated for cases that settled in 2014 or later, and account for the U.S. Supreme Court's 2005 landmark decision in *Dura Pharmaceuticals Inc. v. Broudo*, 544 U.S. 336. Plaintiff-style damages are based on the stock-price movements associated with the alleged disclosure dates that are described in the settlement plan of allocation.

3 Available on a subscription basis. For further details, see https://www.issgovernance.com/securities-class-action-services/.

4 Movements of partial settlements between years can cause settlement amounts reported for prior years to differ from those presented in earlier reports.

5 This categorization is based on the timing of the settlement hearing date. If a new partial settlement equals or exceeds 50% of the then-current settlement fund amount, the entirety of the settlement amount is recategorized to reflect the settlement hearing date of the most recent partial settlement. If a subsequent partial settlement is less than 50% of the then-current total, the partial settlement is added to the total settlement amount and the settlement hearing date is left unchanged.

About the Authors

Laarni T. Bulan
Vice President, Cornerstone Research

Laarni Bulan has over 14 years of experience consulting on complex litigation involving economic and financial issues. Dr. Bulan specializes in securities, mergers and acquisitions and other corporate transactions, firm valuation, risk management, executive compensation, and corporate governance matters.

Dr. Bulan serves as co-head of the firm's corporate governance practice. She is a member of the Advisory Board of the Institute for Law and Economics at the University of Pennsylvania Carey Law School.

Dr. Bulan has published numerous articles in peer-reviewed journals, including *Financial Management*, the *Journal of Banking and Finance*, the *Journal of Economics and Business*, and the *Journal of Urban Economics*. Her research covers dividend policy, capital structure, executive compensation, corporate governance, and real options. Prior to joining Cornerstone Research, Dr. Bulan held a joint appointment at Brandeis University, where she served as an assistant professor of finance in the International Business School and also in the economics department.

Eric Tam
Principal, Cornerstone Research

Eric Tam specializes in securities litigation. Mr. Tam has more than 20 years of experience consulting to clients and addressing financial economics issues and class actions in federal and state courts, including the Delaware Court of Chancery. His experience spans all stages of the litigation process, including exposure analysis, class certification, expert support, summary judgment filings, mediation and settlement analysis, trial preparation, and regulatory proceedings.

Mr. Tam has extensive expertise with securities litigation involving alleged misrepresentations under Section 10(b) of the Exchange Act and Sections 11 and 12 of the Securities Act. He also addresses allegations of market manipulation under Sections 9 and 10(b) of the Exchange Act and claims under Section 14(a) of the Exchange Act.

Mr. Tam has analyzed class certification issues (market efficiency, price impact, and evaluation of damages methodologies in the context of *Comcast* standards), as well as loss causation, damages, and materiality in numerous securities class actions.

The views expressed herein are solely those of the authors and do not necessarily represent the views of Cornerstone Research.

CORNERSTONE RESEARCH
Economic and Financial Consulting and Expert Testimony

The authors request that you reference Cornerstone Research in any reprint of the information or figures included in this report.

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Cornerstone Research

Cornerstone Research is at the forefront of economic and financial consulting, delivering the rigorous analytical solutions required to navigate complex disputes. The firm draws from an extensive network of prominent academic and industry experts to support each matter effectively. Pairing a deep understanding of economics and finance with a suite of industry-leading artificial intelligence and machine learning tools, Cornerstone provides clients with a sophisticated, tailored approach. A reputation for innovation, precision, and excellence has defined Cornerstone since 1989. That momentum continues with over 1,000 professionals collaborating across nine offices in the US, UK, and EU.

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Exhibit 3

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Counsel for Central Laborers' Pension Fund and Proposed Co-Class Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, et. al., Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

EVERBRIDGE, INC., et. al.,

Defendants.

Case No. 2:22-cv-2249-FWS-RAOx

CLASS ACTION

DECLARATION OF KENTON W. DAY IN SUPPORT OF (1) LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION, AND (2) LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES

Hearing Date: December 17, 2026
Time: 10:00 a.m.
Courtroom: 10D
Judge: Honorable Fred W. Slaughter

I, Kenton W. Day, hereby declare under penalty of perjury as follows:

1. I am the Executive Director for Central Laborers' Pension Fund ("Central Laborers" or the "Fund"), which, along with the Sylebra Funds, sought to be a proposed class representative in the above-captioned action (the "Action" or the "Litigation").[1] I have served in my position as Central Laborers' Executive Director since January 2022. I respectfully submit this Declaration on behalf of Central Laborers in support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses.

2. Central Laborers is aware of and understands the requirements and responsibilities of a class representative in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 ("PSLRA"). Since moving to be co-class representative, Central Laborers has been directly involved in monitoring the prosecution of the Action, and could and would produce a representative to testify competently thereto.

I. Central Laborers' Oversight of the Action

3. Central Laborers is a Taft-Hartley Trust Fund based in Jacksonville, Illinois, and is governed by the Employee Retirement Income Security Act of 1974 ("ERISA"). The Fund was created in 1965 in order to provide financial security to laborers during retirement, and currently has more than 7,500 pensioners and beneficiaries that receive approximately $124 million each year in benefits. The total value of the Fund's assets under management is currently approximately $1.6 billion.

4. Central Laborers purchased Everbridge common stock during the Settlement Class Period and suffered losses as a result. As a Taft-Hartley Trust

[1] Unless otherwise indicated, capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated August 10, 2026 (ECF 188-3) (the "Stipulation" or "Settlement Agreement").

Fund, the Fund is accustomed to serving as a fiduciary, and believes that its active participation in appropriate litigation, such as this Action, is necessary to protect the interest of its participants.

5. Central Laborers' understanding of the responsibilities and fiduciary duties involved in securities class action litigation and settlements is informed by its experience serving as a lead plaintiff in other securities class actions, including with other institutional investors. Notably, Central Laborers' achievements in securities class actions include: *Sheet Metal Workers Local 19 Pension Fund v. ProAssurance Care*, No. 2:20-cv-00856-PDP (N.D. Ala.) ($28 million settlement); *Plymouth County Ret. Sys. v. Patterson Co., Inc.*, No. 0:18-cv-00871-MJD-DTS (D. Minn.) ($63 million settlement); *Hiatt v. Sirva, Inc.*, No. 1:04-cv-07532 (N.D. Ill.) ($53 million settlement); *In re McAfee, Inc. S'holder Litig.*, Lead Case No. 1:10-cv-180413 (Cal. Super. Ct., Santa Clara Cnty.) ($11 million settlement); and *In re Dole Food Co., Inc. S'holder Litig.*, No. 8703-VCL (Del. Ch.) (settlement exceeding $100 million).

6. One of my responsibilities as the Executive Director of the Fund involves overseeing litigation brought by Central Laborers. As a result, I am familiar with the duties undertaken by the Fund with respect to this Action after being asked by the Sylebra Funds to serve as a proposed co-class representative. These duties included participating in class certification briefing, collecting and producing documents on behalf of the Fund, providing sworn interrogatory responses on behalf of the Fund, providing deposition testimony, and participating in strategic decision making and settlement approval.

7. On behalf of Central Laborers, I and others, including the Fund's counsel, Cavanagh & O'Hara LLP, had regular communications with proposed co-class counsel Robbins Geller Rudman & Dowd LLP ("Robbins Geller"). Central Laborers received regular status reports from Robbins Geller on case developments

and participated in discussions with attorneys from Robbins Geller concerning the prosecution of the Action, the strengths of and risks to the claims, and the Settlement.

8. In particular, throughout the course of this Action, other Fund representatives and I coordinated with Robbins Geller about, and participated in, the following events:

(a) reviewed the merits of the case and decided to move for co-class representative appointment, including reviewing the Fund's class representative application, communicating with Robbins Geller regarding the co-class representative application, and executing a declaration detailing the Fund's commitment to efficiently and effectively litigating the proposed Class's claims under our supervision;

(b) worked closely with and regularly corresponded with Robbins Geller and Cavanagh & O'Hara LLP concerning the litigation;

(c) reviewed pleadings and motions filed in this litigation, including the motion for class certification, and other key filings and opinions throughout the Litigation;

(d) responded to Defendants' First and Second Requests for Production to Central Laborers' Pension Fund, including searching for and producing documents;

(e) responded to Defendants' First and Second Set of Interrogatories to Central Laborers' Pension Fund;

(f) prepared for and provided deposition testimony in connection with the motion for class certification; and

(g) evaluated and approved the proposed Settlement.

9. Throughout the Fund's participation in the prosecution of the Action, Central Laborers was represented and supported by me and other Fund representatives. In total, the other Fund representatives and I devoted approximately 50.25 hours in support of Central Laborers' efforts in furtherance of the prosecution

of this Action and to achieve this recovery on behalf of Everbridge shareholders during the Settlement Class Period.[2]

II. Central Laborers Strongly Endorses Approval of the Settlement

10. Based on its participation in the Action, Central Laborers believes that the proposed Settlement is fair, reasonable, and adequate to the Settlement Class. The Settlement provides an excellent recovery for the Settlement Class, particularly in light of the risks of continued litigation.

11. The prosecution and settlement of this Action required extensive efforts on the part of Lead Plaintiffs and Plaintiffs' Counsel, particularly given the complexity of the legal and factual issues and the vigorous defense by Defendants and their counsel. The risk of no recovery was very real here, particularly because certain statements in the complaint had already been dismissed, and there was no guarantee that the entirety of the claims would survive class certification or a motion for summary judgment, much less succeed at trial or in potential appellate practice.

12. Central Laborers strongly endorses the Settlement as it provides a certain, immediate, and substantial cash recovery for the Settlement Class. The Fund firmly believes that settling the Action with Defendants at this stage of the litigation is in the best interest of the Settlement Class.

III. Approval of the Attorneys' Fee Request and Litigation Expenses

13. Central Laborers believes that the request for an award of attorneys' fees in the amount of 25% of the Settlement Fund is fair and reasonable in light of the exceptional work that Plaintiffs' Counsel performed on behalf of the Settlement Class, including successfully appealing the initial dismissal of the complaint. A 25% award is particularly appropriate here because of the highly complex issues involved,

[2] While Central Laborers devoted a significant amount of time to this Action, our request for reimbursement of costs is based on a very conservative estimate of the amount of time we collectively spent on this litigation, as supported by our and Robbins Geller's records.

Plaintiffs' Counsel's tremendous investment of time and resources, the outstanding result achieved, the approval of the Settlement Class, and the significant risks in the Litigation.

14. Central Laborers takes seriously its role as a proposed co-class representative to ensure that attorneys' fees are fair in light of the result achieved for the Settlement Class and to reasonably compensate Plaintiffs' Counsel for the work involved and the substantial risks Plaintiffs' Counsel undertook in litigating the Action.

15. The Fund further believes that the litigation expenses being requested for payment to Plaintiffs' Counsel are reasonable, and represent costs and expenses necessary for the prosecution and resolution of the claims in the Action. Based on the foregoing, Central Laborers fully supports the request for attorneys' fees and expenses.

IV. Central Laborers' Representative Reimbursement

16. Central Laborers understands that reimbursement of a class representative's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. §78u-4(a)(4), which provides for an "award of reasonable costs and expenses (including lost wages) directly relating to the representation of the class to any representative party serving on behalf of a class." For this reason, in connection with Plaintiffs' Counsel's request for payment of litigation expenses, the Fund seeks reimbursement for the costs and expenses that it incurred directly related to its efforts on behalf of the Settlement Class in the Action.

17. Central Laborers respectfully submits that since it joined this Action, its significant oversight of counsel in this Action, its active participation in the Litigation and resolution of the case, and the time Fund representatives devoted to pursuing claims on behalf of the Settlement Class helped to achieve this Settlement and justifies this request.

18. The time that other Central Laborers staff members and I devoted to pursuing the Settlement Class's interests in this Action was time we otherwise would have devoted to other work for the Fund, and thus represents a direct cost to Central Laborers. As detailed above, we collectively devoted approximately 50.25 hours to this Action. In calculating the total cost of this time to the Fund, Central Laborers applied individual billing rates, which ranged from $68.25/hour to $167.87/hour, to the amount of time each individual devoted to prosecution of the Action. The hourly rates and hours devoted to this Action of myself and other Central Laborers staff members are as follows: (i) Kenton W. Day: Executive Director - $167.87/hour (39.25 hours); (ii) Sharon West: Assistant Executive Director – $134.72/hour (1 hour); (iii) Jason Sipes: Information Technology Director – $94.09/hour (5 hours); and (iv) Anne Mogg: Staff Auditor – $68.25/hour (5 hours).[3] This calculation resulted in a total cost of $7,535.32 to Central Laborers, for which the Fund respectfully requests reimbursement.

V. Conclusion

19. In light of the foregoing, Central Laborers respectfully submits that the Court should grant Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and approve the request to award the Fund reimbursement of $7,535.32 pursuant to 15 U.S.C. §78u-4(a)(4) for its costs in connection with the prosecution of this Action.

[3] The hourly rate used for purposes of this calculation are based on each individual's respective annual salary.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Executed on 10th day of November, 2026.

Kenton W. Day
Executive Director

On behalf of Central Laborers' Pension Fund

Exhibit 4

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, AND SYLEBRA CAPITAL MENLO MASTER FUND, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, v. EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON et al., Defendants.	Case No. 2:22-cv-02249-FWS-RAO CLASS ACTION **DECLARATION OF LANCE CAVALLO REGARDING (A) DISSEMINATION OF POSTCARD NOTICE; (B) PUBLICATION OF SUMMARY NOTICE; (C) ESTABLISHMENT OF TELEPHONE HOTLINE AND SETTLEMENT WEBSITE; AND (D) REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE**

I, Lance Cavallo, declare and state as follows:

1. I am a Vice President of Class Actions at Verita Global, LLC ("Verita"). Pursuant to the Court's Order Granting Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement ("Preliminary Approval Order") (ECF No. 190), the Court approved the retention of Verita as Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the "Action").[1] I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

DISSEMINATION OF THE POSTCARD NOTICE AND NOTICE PACKET

2. Pursuant to the Preliminary Approval Order, Verita is responsible for disseminating notice of the Settlement. Specifically, Verita is responsible for

[1] All terms with initial capitalization not otherwise defined herein shall have the meanings given to them in the Stipulation and Agreement of Settlement, dated August 10, 2026 (the "Stipulation"). ECF No. 188-3.

disseminating the Postcard Notice to potential Settlement Class Members and their banks, brokers, custodians (nominees) and disseminating the long-form Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys' Fees and Expenses ("Notice") and Proof of Claim and Release ("Claim Form," together with the Notice, the "Notice Packet") to nominees and potential Settlement Class Members upon request. Copies of the Postcard Notice and Notice Packet are attached hereto as Exhibit A and B, respectively.

3. In accordance with the Stipulation and Preliminary Approval Order, Lead Counsel provided Verita with lists of Everbridge, Inc. ("Everbridge") record owners, provided to Lead Counsel by Defendants' Counsel. Verita reviewed the lists to identify and eliminate duplicate entries and incomplete data, resulting in a mailing list of 52 unique names and addresses, and 20 email addresses, of persons and entities who or which purchased or otherwise acquired the publicly traded common stock of Everbridge during the period from February 18, 2020 through February 24, 2022, both dates inclusive (the "Class Period"). On September 15, 2026, Verita used the records from the electronic lists to cause the Postcard Notice to be mailed by First-Class Mail to 52 potential Settlement Class Members and emailed to 20 potential Settlement Class Members.

4. As in most class actions of this nature, a large majority of potential class members are beneficial owners whose securities are held in "street name" – *i.e.*, the securities were purchased by brokerage firms, banks, institutions and other third-party nominees in the name of the nominee, on behalf of the beneficial owner. Verita maintains a proprietary database with the names and addresses of the largest and most common banks, brokerage firms, and nominees, including national and regional offices of certain nominees (the "Nominee Database"). Verita's Nominee Database is updated from time to time as new nominees are identified, and others merge or cease to exist. At the time of the initial mailing, the Nominee Database contained 257 mailing records. On September 15, 2026, Verita caused Postcard

Notices and a cover letter to be mailed to the 257 mailing records contained in Verita's Nominee Database. Also on September 15, 2026, Verita mailed Postcard Notices to the 4,405 institutions included on the U.S. Securities and Exchange Commission's ("SEC") list of active brokers and dealers at the time of mailing.

5. The letter included with the Postcard Notice directed those who purchased or otherwise acquired Everbridge common stock during the Class Period for the beneficial interest of persons or entities other than themselves to provide Verita with the names and addresses (and, if available, email addresses) of each of the beneficial owners, so that Verita could mail (and email) Postcard Notices promptly to the beneficial owners. Alternatively, nominees could request copies of the Postcard Notice in bulk from Verita in order to mail them to the beneficial owners.

6. Verita also provided a copy of the Notice to the Depository Trust Company ("DTC") for posting on its Legal Notice System ("LENS"). DTC, a member of the U.S. Federal Reserve System, provides a range of securities processing services to its participants, including deposits, withdrawals, electronic direct registration and custody for various types of securities. LENS may be accessed by any broker or nominee that participates in DTC's security settlement system. The Notice was posted on DTC's LENS on September 15, 2026.

7. The Postcard Notice and Notice Packet were also provided electronically to approximately 340 institutions that monitor securities class actions for their investor clients and regularly act on their behalf to file claims in these types of matters.

8. Following the initial mailing, through November 5, 2026, Verita has received an additional 13,236 unique names and addresses and 400 email addresses of potential Settlement Class Members from individuals or nominees requesting that a Postcard Notice be mailed or emailed to such persons or entities. Additionally, Verita has received bulk requests from nominees for an additional

31,640 Postcard Notices for forwarding directly to their customers. Verita also was advised that a Nominee caused the Postcard Notice to be emailed to an additional 34,044 potential Settlement Class Members. All such requests have been responded to in a timely manner, and Verita will continue to disseminate Postcard Notices (and Notice Packets if requested) upon receipt of any additional requests and/or upon receipt of updated addresses.

9. As a result of the efforts described above, as of November 5, 2026, a total of 49,590 Postcard Notices and 3 Notice Packets have been mailed, and a total of 34,804 Postcard Notices and 340 Notice Packets have been emailed, to potential Settlement Class Members or their nominees.

PUBLICATION OF THE SUMMARY NOTICE

10. Pursuant to the Preliminary Approval Order, Verita caused the Summary Notice to be published in *The Wall Street Journal* and transmitted over *PR Newswire* on September 29, 2026. Attached hereto as Exhibit C are confirmations of such publication and transmittal.

TELEPHONE HOTLINE

11. Verita established and continues to maintain a toll-free telephone number (1-888-808-1850) for potential Settlement Class Members to call and obtain information about the Settlement, request a Postcard Notice or Notice Packet, and/or seek assistance from an operator during regular business hours. The toll-free telephone number is set forth in the Postcard Notice, Notice, Claim Form, Summary Notice, and on the Settlement Website.

SETTLEMENT WEBSITE

12. To further assist potential Settlement Class Members, Verita, in coordination with Lead Counsel, designed, implemented and currently maintains a website dedicated to the Settlement, www.EverbridgeSecuritiesSettlement.com. The address for the Settlement Website is set forth in the Postcard Notice, Notice,

Claim Form, and Summary Notice. The Settlement Website became operational on September 15, 2026, and is accessible 24 hours a day, 7 days a week.

13. The Settlement Website lists the exclusion, objection, and claim submission deadlines, as well as the date, time and location of the Court's final Settlement Hearing. In addition, the Settlement Website contains links to copies of the Operative Complaint, Stipulation, the Preliminary Approval Order, the Postcard Notice, the Notice, and the Claim Form, all of which can be downloaded by potential Settlement Class Members. The Settlement Website also enables potential Settlement Class Members to submit a claim online and contains detailed instructions for entities that wish to submit claims electronically. Verita will continue operating, maintaining and, as appropriate, updating the Settlement Website until the conclusion of the claims administration process.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE

14. Pursuant to Paragraph 48 of the Notice, Settlement Class Members who wish to be excluded from the Settlement Class are required to mail a written request for exclusion addressed to: Everbridge Securities Settlement, c/o Verita Global, LLC, Exclusions, P.O. Box 301170, Los Angeles, CA 90030-1170, such that the request is received no later than November 25, 2026. As of November 5, 2026, Verita has received zero (0) requests for exclusion from the Settlement Class. Verita will submit a supplemental declaration after the November 25, 2026 exclusion deadline, which will report on any exclusion requests received.

15. To date, Verita has not received any mis-directed objections, which must be filed with the Court and mailed to counsel.

16. The Claim deadline is November 25, 2026. Claims processing is well underway and Verita's supplemental declaration will provide an update on the Claims Process.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Wantagh, New York on November 6, 2026.

Lance Cavallo

Lance Cavallo

Exhibit A

Everbridge Securities Settlement
c/o Verita Global, LLC
P.O. Box 301170
Los Angeles, CA 90030-1170

COURT-ORDERED LEGAL NOTICE

Important Legal Notice Authorized by the United States District Court, Central District of California about the Settlement of a Class Action.

If you purchased or otherwise acquired the publicly traded common stock of Everbridge, Inc. during the period from February 18, 2020 through February 24, 2022, both dates inclusive (the "Class Period"), and were allegedly damaged thereby, a class action Settlement has been reached that will impact your legal rights.

You may be eligible for a cash payment.
Please read this postcard carefully.

For more information, please visit:
www.EverbridgeSecuritiesSettlement.com.

Scan QR Code for a more detailed notice about the proposed Settlement.

EVS

A proposed Settlement has been reached in the class action lawsuit captioned *Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc., et al.*, 2:22-cv-02249-FWS-RAO (C.D. Cal.) (the "Action"). If approved, the Settlement will end the lawsuit, in which Lead Plaintiffs bring claims under Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 10b-5 thereunder, and Section 20(a) of the Exchange Act, alleging Defendants made material misrepresentations and omissions concerning the integration of certain of Everbridge's acquisitions and the 2021 revenue contribution of xMatters.

You received this postcard because you, or an investment account you represent, may be a member of the proposed Settlement Class (explained below). The issuance of this postcard does not reflect the opinion of the Court on the merits of the claims or defenses asserted by either side in the lawsuit. Defendants deny all liability or wrongdoing. Capitalized terms not defined in this postcard have the meanings given in the Stipulation and Agreement of Settlement, dated as of August 10, 2026 (the "Stipulation"). THIS POSTCARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT. PLEASE VISIT **WWW.EVERBRIDGESECURITIESSETTLEMENT.COM** AND THE LONG-FORM SETTLEMENT NOTICE FOR MORE INFORMATION.

What does the Settlement provide?

Defendants have agreed to pay, or cause the payment of, **$85,000,000** in exchange for the settlement and release of all claims in the Action and related claims ("Released Plaintiffs' Claims"). The Settlement Amount, plus accrued interest, after deduction of Court-awarded attorneys' fees and expenses, Notice and Administration Expenses, and Taxes, will be allocated among Settlement Class Members who submit timely and valid claims.

Your *pro rata* share of the Settlement proceeds will depend on, among other things, the number and value of submitted claims, how many eligible shares of Everbridge publicly traded common stock you bought, and when your shares were purchased, acquired, or sold. If all Settlement Class Members participate in the Settlement, the estimated average recovery will be approximately $2.32 per eligible share before deduction of Court-approved fees and costs. Your portion of the Settlement proceeds will be determined by the Plan of Allocation approved by the Court. The proposed plan is in the long-form Notice.

Am I affected by the Settlement?

Receipt of this postcard does not mean you are a Settlement Class Member. The Settlement Class is: **All persons and entities who or which purchased or otherwise acquired the publicly traded common stock of Everbridge during the period from February 18, 2020 through February 24, 2022, both dates inclusive (the "Class Period"), and were allegedly damaged thereby (the "Settlement Class")**. Certain individuals and entities (including Defendants and their family members) are excluded from the Settlement Class by definition.

How do I get a payment?

Receipt of this postcard does not mean you are eligible for a recovery. To qualify for payment, you must submit a valid Claim Form, which can be found at **www.EverbridgeSecuritiesSettlement.com**, or you can request one by contacting the Claims Administrator. Claim Forms must be postmarked by **November 25, 2026**, and be mailed to: *Everbridge Securities Settlement,* c/o Verita Global, LLC, P.O. Box 301170, Los Angeles, CA 90030-1170, or be submitted online by **November 25, 2026**.

How will Plaintiffs' Counsel be paid?

Lead Counsel has appointed the law firm of Labaton Keller Sucharow LLP as Lead Counsel. Lead Counsel will ask the Court to award Plaintiffs' Counsel up to 28% of the Settlement Fund in attorneys' fees, plus expenses of no more than $675,000, which may include reimbursement to Plaintiffs for their costs pursuant to 15 U.S.C. § 78u-4(a)(4). These fees and costs would total approximately $0.67 per eligible share.

What are my other options?

You may request exclusion from the Settlement Class by **November 25, 2026**; object to the Settlement, the Plan of Allocation, or Lead Counsel's Fee and Expense Application by **November 25, 2026**, or do nothing. If you exclude yourself, you may be able to pursue the claims being settled on your own, but you cannot get money from the Settlement or object. If the Court does not approve the Settlement, no payments will be made, and the lawsuit will continue. By doing nothing, you will get no payment, and you will not be able to sue any of the Released Defendant Parties for the Released Plaintiffs' Claims. The long-form Notice provides instructions for submitting a Claim Form, requesting exclusion, and objecting, and you must comply with all of the instructions. Visit **www.EverbridgeSecuritiesSettlement.com** for more information.

What happens next?

The Court will hold a hearing on **December 17, 2026, at 10:00 a.m. (Pacific Time)**, to consider whether to approve the Settlement, the Fee and Expense Application, or the Plan of Allocation. You will be represented by Lead Counsel unless you enter an appearance through your own counsel, at your cost. You may attend the hearing and do not need an attorney to do so.

Questions?

To learn more, scan the QR code, visit **www.EverbridgeSecuritiesSettlement.com**, call 888-808-1850, email info@EverbridgeSecuritiesSettlement.com, or write to *Everbridge Securities Settlement*, c/o Verita Global, LLC, P.O. Box 301170, Los Angeles, CA 90030-1170.

Exhibit B

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, AND SYLEBRA CAPITAL MENLO MASTER FUND, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, v. EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON et al., Defendants.	Case No. 2:22-cv-02249-FWS-RAO CLASS ACTION

NOTICE OF PENDENCY OF CLASS ACTION, PROPOSED SETTLEMENT, AND MOTION FOR ATTORNEYS' FEES AND EXPENSES

If you purchased or otherwise acquired Everbridge, Inc. publicly traded common stock during the period from February 18, 2020 through February 24, 2022, both dates inclusive (the "Class Period"), and were allegedly damaged thereby, you may be entitled to a payment from a class action settlement.[1]

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- This Notice describes important rights you may have and what steps you must take if you wish to participate in the Settlement of this securities class action, wish to object, or wish to be excluded from the Settlement Class.
- If approved by the Court, the proposed Settlement will create an $85,000,000 fund, plus earned interest, for the benefit of eligible Settlement Class Members after the deduction of Court-approved attorneys' fees, expenses, and Taxes. This is an average recovery of approximately $2.32 per allegedly damaged share before deductions for awarded attorneys' fees and Litigation Expenses, and approximately $1.65 per allegedly damaged share after deductions for awarded attorneys' fees and Litigation Expenses.
- The Settlement resolves claims by Court-appointed Lead Plaintiffs Sylebra Capital Partners Master Fund Ltd, Sylebra Capital Parc Master Fund, and Sylebra Capital Menlo Master Fund (collectively, "Lead Plaintiffs"), that have been asserted on behalf of the Settlement Class (defined below) against Everbridge, Inc. ("Everbridge" or the "Company"), and David Meredith and Patrick Brickley (the "Individual Defendants," together with Everbridge, the "Defendants"). The Settlement avoids the costs and risks of continuing the litigation; pays money to eligible investors; and releases the Released Defendant Parties (defined below) from liability.

If you are a Settlement Class Member, the Settlement will affect your legal rights whether you act or do not act. Please read this Notice carefully.

[1] The terms of the Settlement are in the Stipulation and Agreement of Settlement, dated August 10, 2026 (the "Stipulation"), which can be viewed at www.EverbridgeSecuritiesSettlement.com. All capitalized terms not defined in this Notice have the same meanings as defined in the Stipulation.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM BY NOVEMBER 25, 2026	The only way to get a payment. *See* Question 9 for details.
EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS BY NOVEMBER 25, 2026	Get no payment. This is the only option that, assuming your claim is timely brought, might allow you to ever bring or be part of any other lawsuit against Defendants and/or the other Released Defendant Parties concerning the Released Plaintiffs' Claims. *See* Question 11 for details.
OBJECT BY NOVEMBER 25, 2026	Write to the Court about why you do not like the Settlement, the Plan of Allocation for distributing the proceeds of the Settlement, and/or Lead Counsel's Fee and Expense Application. If you object, you will still be in the Settlement Class. *See* Question 15 for details.
PARTICIPATE IN A HEARING ON DECEMBER 17, 2026 AND FILE A NOTICE OF INTENTION TO APPEAR BY NOVEMBER 25, 2026	Ask to speak in Court at the Settlement Hearing about the fairness of the Settlement and other requested relief. *See* Questions 15 and 19 for details.
DO NOTHING	Get no payment. Give up all legal rights relating to the claims at issue. Still be bound by the terms of the Settlement.

- These rights and options**—and the deadlines to exercise them—**are explained below.
- The Court in charge of this case still has to decide whether to approve the proposed Settlement. Payments will be made to all eligible Settlement Class Members who timely submit valid Claim Forms, if the Court approves the Settlement and after any appeals are resolved.

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PSLRA SUMMARY OF THE NOTICE

Statement of the Settlement Class's Recovery

1. Lead Plaintiffs have entered into the proposed Settlement with the Defendants which, if approved by the Court, will resolve the Action in its entirety. Subject to Court approval, Lead Plaintiffs, on behalf of the Settlement Class, have agreed to settle the Action in exchange for a payment of $85,000,000 in cash (the "Settlement Amount"), which will be deposited into an interest-bearing Escrow Account (the "Settlement Fund"). Based on Lead Plaintiffs' consulting damages expert's estimate of the number of shares of Everbridge publicly traded common stock eligible to participate in the Settlement, and assuming that all investors eligible to participate in the Settlement do so, it is estimated that the average recovery, before deduction of any Court-approved fees and expenses, such as attorneys' fees, Litigation Expenses, Taxes, and Notice and Administration Expenses, would be approximately $2.32 per allegedly damaged share. If the Court approves Lead Counsel's Fee and Expense Application (discussed below), the average recovery would be approximately $1.65 per allegedly damaged share. **These average recovery amounts are only estimates and Settlement Class Members may recover more or less than these estimates.** A Settlement Class Member's actual recovery will depend on, for example: (i) the number and value of claims submitted; (ii) the amount of the Net Settlement Fund; (iii) when and how many shares of Everbridge publicly traded common stock the Settlement Class Member purchased; and (iv) whether and when the Settlement Class Member sold Everbridge publicly traded common stock. *See* the Plan of Allocation beginning on page 12 for information about the calculation of your Recognized Claim.

Statement of Potential Outcome of Case if the Action Continued to Be Litigated

2. The Parties disagree about both liability and damages and do not agree about the amount of damages that would be recoverable if Lead Plaintiffs were to prevail on each claim. The issues on which the Parties disagree include, for example: (i) whether Defendants made any statements or omissions that were materially misleading or were otherwise actionable under the federal securities laws; (ii) whether any such statements or omissions were made with the requisite level of intent; (iii) the amount by which the price of Everbridge publicly traded common stock was allegedly artificially inflated, if at all, during the Class Period; and (iv) the extent to which factors such as general market, economic and industry conditions influenced the trading price of Everbridge publicly traded common stock at various times.

3. Defendants have denied and continue to deny any and all allegations of wrongdoing or fault asserted in the Action, deny that they have committed any act or omission giving rise to any liability or violation of law, and deny that Lead Plaintiffs and the Settlement Class have suffered any loss attributable to Defendants' actions or omissions.

Statement of Attorneys' Fees and Expenses Sought

4. Lead Counsel, on behalf of Plaintiffs' Counsel,[2] will apply to the Court for attorneys' fees from the Settlement Fund in an amount not to exceed 28% of the Settlement Fund, which includes any accrued interest, or $23,800,000, plus accrued interest. Lead Counsel will also apply for payment of Litigation Expenses incurred in prosecuting the Action in an amount not to exceed $675,000, plus accrued interest, which may include an application pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA") for the reasonable costs and expenses (including lost wages) of Plaintiffs directly related to their representation of the Settlement Class. If the Court approves Lead Counsel's Fee and Expense Application in full, the average amount of fees and expenses is estimated to be approximately $0.67 per allegedly damaged share of Everbridge common stock. A copy of the Fee and Expense Application will be posted on www.EverbridgeSecuritiesSettlement.com after it has been filed with the Court.

Reasons for the Settlement

5. For Lead Plaintiffs, the principal reason for the Settlement is the guaranteed cash benefit to the Settlement Class. This benefit must be compared to, among other factors, the uncertainty of being able to prove the allegations in the Operative Complaint and certify a litigation class; the difficulties and delays inherent in completing discovery; the risk that the Court may grant some or all of the anticipated summary judgment motions to be filed by Defendants; the risks of litigation, especially in complex securities actions like this; as well as the difficulties and delays inherent in such litigation (including any trial and appeals). For Defendants, who deny all allegations of wrongdoing or liability whatsoever and deny that Settlement Class Members were damaged, the principal reasons for entering into the Settlement are to end the burden, expense, uncertainty, and risk of further litigation. Accordingly, the Settlement may not be construed as an admission of any wrongdoing by Defendants.

[2] "Plaintiffs' Counsel" are Labaton Keller Sucharow LLP, Robbins Geller Rudman & Dowd LLP, and David M. Goldstein.

Identification of Representatives

6. Lead Plaintiffs and the Settlement Class are represented by Lead Counsel, Michael H. Rogers, Esq., Labaton Keller Sucharow LLP, 140 Broadway, New York, NY 10005, 888-219-6877, www.labaton.com, settlementquestions@labaton.com.

7. Further information regarding the Action, the Settlement, and this Notice may be obtained by contacting the Claims Administrator: *Everbridge Securities Settlement*, c/o Verita Global, LLC, P.O. Box 301170, Los Angeles, CA 90030-1170, 888-808-1850, www.EverbridgeSecuritiesSettlement.com.

Please Do Not Call the Court with Questions About the Settlement.

BASIC INFORMATION

1. Why did I get the Postcard Notice?

8. You may have received a Postcard Notice about the proposed Settlement. This long-form Notice provides additional information about the Settlement and related procedures. The Court authorized that the Postcard Notice be sent to you because you or someone in your family may have purchased or acquired Everbridge publicly traded common stock during the Class Period. **Receipt of the Postcard Notice does not mean that you are a Member of the Settlement Class or that you will be entitled to receive a payment. The Parties to the Action do not have access to your individual investment information. If you wish to be eligible for a payment, you are required to submit the Claim Form that is available at www.EverbridgeSecuritiesSettlement.com. *See* Question 9 below.**

9. The Court directed that the Postcard Notice be sent to Settlement Class Members because they have a right to know about the proposed Settlement of this class action lawsuit, and about all of their options, before the Court decides whether to approve the Settlement.

10. The Court in charge of the Action is the United States District Court for the Central District of California, and the case is known as *Sylebra Capital Partners Master Fund LTD*, *et al. v. Everbridge, Inc., et al.*, No. 2:22-cv-02249-FWS-RAO (C.D. Cal.). The Action is assigned to the Honorable Fred W. Slaughter, United States District Judge.

2. How do I know if I am part of the Settlement Class?

11. The Court directed that everyone who fits the following description is a Settlement Class Member and subject to the Settlement, unless they are an excluded person (*see* Question 3 below) or take steps to exclude themselves from the Settlement Class (*see* Question 11 below):

> **All persons and entities who or which purchased or otherwise acquired the publicly traded common stock of Everbridge during the period from February 18, 2020 through February 24, 2022, both dates inclusive, and were allegedly damaged thereby.**

12. If one of your mutual funds purchased Everbridge publicly traded common stock during the Class Period, that does not make you a Settlement Class Member, although your mutual fund may be. You are a Settlement Class Member only if you individually purchased Everbridge publicly traded common stock during the Class Period. Check your investment records or contact your broker to see if you have any eligible purchases or acquisitions. **The Parties to the Action do not independently have access to your trading information.**

3. Are there exceptions to being included?

13. Yes. There are some individuals and entities who are excluded from the Settlement Class by definition. Excluded from the Settlement Class are: (i) Defendants; (ii) members of the Immediate Family of any Defendant who is an individual; (iii) any person who was an officer, director, or control person of Everbridge during the Class Period; (iv) any firm, trust, corporation, or other entity in which any Defendant has or had a controlling or beneficial interest; (v) Everbridge's employee retirement and benefit plan(s) and their participants or beneficiaries, to the extent they made purchases through such plan(s); and (vi) the legal representatives, affiliates, heirs, successors-in-interest, or assigns of any such excluded person. Also excluded from the Settlement Class are those Persons who or which submit a timely and valid request for exclusion from the Settlement Class in accordance with the procedures described in Question 11 below.

4. Why is this a class action?

14. In a class action, one or more persons or entities (in this case, Lead Plaintiffs) sue on behalf of people and entities who have similar claims. Together, these people and entities are a "class," and each is a "class member." A class action allows one court to resolve, in a single case, many similar claims that, if brought separately by individual people, might be too small economically to litigate. One court resolves the issues for all class members at the same time, except for those who exclude themselves, or "opt out," from the class. In this Action, the Court has appointed Sylebra Capital Partners Master Fund Ltd, Sylebra Capital Parc Master Fund, and Sylebra Capital Menlo Master Fund as Lead Plaintiffs and Labaton Keller Sucharow LLP to serve as Lead Counsel.

5. What is this case about and what has happened so far?

15. Everbridge was founded in 2002 as a company that offered a Mass Notification software, which sent messages via telephone, text, and email to an entire population in the event of a threat or emergency. To generate long-term growth, Everbridge developed a Critical Event Management suite, which it described as a collection of various products that enable organizations to assess, manage, and respond to distinct threats and emergencies, all on a single platform.

16. The case alleges that Defendants made materially misleading statements and omissions surrounding Everbridge's acquisitions during the Class Period, including the acquisition of an IT service platform called xMatters. The Operative Complaint alleges that Defendants made allegedly false or misleading statements regarding the progress of Everbridge's integration of these acquisitions and xMatters' contribution to Everbridge's revenue in 2021.

17. By an Order dated July 8, 2022, the Court: (i) appointed Sylebra Funds as Lead Plaintiffs; and (ii) approved Labaton Sucharow LLP (n/k/a Labaton Keller Sucharow LLP) ("Labaton") as Lead Counsel and Robbins Geller Rudman & Dowd LLP ("Robbins Geller") as Liaison Counsel.

18. Lead Plaintiffs, through Lead Counsel, conducted a thorough investigation relating to the claims, defenses, and underlying events and transactions that are the subject of the Action. This process has included reviewing and analyzing: (i) regulatory filings made by Everbridge with the U.S. Securities and Exchange Commission ("SEC"); (ii) Company press releases, transcripts of earnings calls, and other public statements issued and disseminated by the Company; (iii) Company website and marketing materials; (iv) price and volume data for Everbridge common stock; (v) research reports from securities and financial analysts; (vi) news and media reports concerning the Company and other facts related to this Action; (vii) interviews with approximately 40 former Everbridge employees (several of whom provided information used in complaints as confidential witnesses); (viii) consultation with experts on loss causation, damages, and accounting issues; (ix) other publicly available material and data; and (x) the applicable law governing the claims and potential defenses.

19. On September 16, 2022, Lead Plaintiffs filed an Amended Class Action Complaint for Violation of the Federal Securities Laws ("First Amended Complaint" or "FAC"), asserting claims pursuant to Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the "Exchange Act") and Rule 10b-5 promulgated thereunder, against Everbridge, Jaime Ellertson, and the Individual Defendants. Among other things, the FAC alleged that defendants made materially false and misleading statements and omissions during the period from November 4, 2019 through February 24, 2022 concerning the integration of Everbridge's acquisitions and the revenue contribution of xMatters.

20. On October 31, 2022, defendants filed their motion to dismiss the FAC, memorandum of points and authorities in support thereof, and related request for judicial notice. On December 15, 2022, Lead Plaintiffs filed their opposition to defendants' motion to dismiss and response to defendants' request for judicial notice. On January 17, 2023, defendants filed their reply in support of the motion to dismiss and request for judicial notice and filed a supplemental request for judicial notice.

21. On May 9, 2023, the Court issued an order granting defendants' motion to dismiss the FAC without prejudice and with leave to amend. The Court in its order concluded that the FAC did not adequately plead the necessary elements of scienter or falsity and dismissed Lead Plaintiffs' claims.

22. On June 30, 2023, Lead Plaintiffs filed a Second Amended Class Action Complaint for Violation of the Federal Securities Laws ("Second Amended Complaint" or "SAC") asserting claims pursuant to Sections 10(b) and 20(a) of the Exchange Act and Rule 10b-5 promulgated thereunder against Everbridge, Ellertson, and the Individual Defendants.

23. On August 14, 2023, defendants filed their second motion to dismiss and related request for judicial notice. On September 28, 2023, Lead Plaintiffs filed their opposition to defendants' second motion to dismiss. On October 30, 2023, defendants filed their reply in support of the motion to dismiss and request for judicial notice. On January 4, 2024, the Court heard oral argument on defendants' second motion to dismiss and took the motion under submission.

24. On March 18, 2024, the Court issued an order granting defendants' motion to dismiss the SAC without prejudice and with leave to amend. The Court in its motion to dismiss order concluded the SAC did not adequately plead scienter or falsity and dismissed Lead Plaintiffs' claims under Section 10(b) and Rule 10b-5, citing reasons similar to those in its order on defendants' motion to dismiss the FAC. The order also dismissed the SAC's Section 20(a) claim against the individual defendants.

25. On April 16, 2024, Lead Plaintiffs filed a notice of appeal to the United States Court of Appeals for the Ninth Circuit (the "Ninth Circuit").

26. On October 8, 2024, Lead Plaintiffs submitted their opening brief with the Ninth Circuit. Defendants filed their answering brief on January 16, 2025. Lead Plaintiffs filed their reply brief on February 6, 2025. On May 20, 2025, the appeal regarding defendants' motion to dismiss the SAC was argued by the parties in Pasadena, California before Ninth Circuit Judges Wardlaw, Graber, and Johnstone.

27. On July 15, 2025, the Ninth Circuit issued its decision, reversing and remanding, in part, the order of the Court dismissing the SAC. The Ninth Circuit held that Lead Plaintiffs adequately alleged scienter and falsity of certain statements but agreed with the Court that the SAC failed to adequately plead statements concerning Everbridge's general acquisition strategy. In so holding, the Ninth Circuit also effectively shortened the class period to February 18, 2020 through February 24, 2022, inclusive.

28. On October 15, 2025, Lead Plaintiffs filed a revised Second Amended Class Action Complaint for Violation of the Federal Securities Laws. In accordance with the Ninth Circuit order, this complaint alleged claims arising during a class period of February 18, 2020 through February 24, 2022, inclusive. On November 10, 2025, Defendants Everbridge, Meredith, and Brickley filed their Answer to the complaint, and defendant Ellertson separately filed his Answer to the complaint.

29. On November 19, 2025, Defendant Ellertson filed a motion for judgment on the pleadings and memorandum of points and authorities in support thereof. On December 5, 2025, Lead Plaintiffs filed their opposition to Defendant Ellertson's motion, and on December 16, 2025, Defendant Ellertson filed his reply in support of his motion.

30. On January 6, 2026, the parties filed a stipulation of dismissal of Defendant Ellertson with prejudice as to the Section 10(b) claim and without prejudice as to the Section 20(a) claim. On January 23, 2026, the parties filed a joint stipulation in support of the filing of a further revised complaint following the stipulation of dismissal of Defendant Ellertson. On January 26, 2026, the Court approved the joint stipulation and ordered Lead Plaintiffs to file a further revised version of the complaint and for Defendants to file an answer thereto.

31. On January 28, 2026, Lead Plaintiffs filed a Corrected Operative Second Amended Class Action Complaint for Violation of the Federal Securities Laws (the "Operative Complaint") asserting claims pursuant to Sections 10(b) and 20(a) of the Exchange Act and Rule 10b-5 promulgated thereunder against Everbridge, Meredith and Brickley. On February 9, 2026, Defendants Everbridge, Meredith, and Brickley filed their answer to the Operative Complaint.

32. On March 12, 2026, Lead Plaintiffs and proposed additional class representative Central Laborers' Pension Fund ("Central Laborers") filed their motion for class certification and appointment of class representatives and co-class counsel (the "Class Certification Motion"). Thereafter, Defendants deposed Lead Plaintiffs and Central Laborers, Central Laborers' external investment manager, and their loss causation and market efficiency expert. On May 18, 2026, Defendants filed their opposition to the Class Certification Motion. Lead Plaintiffs were preparing their reply brief in further support of the Class Certification Motion when the Parties agreed to settle the Action.

33. In connection with fact discovery, Lead Plaintiffs and Defendants served and responded to multiple requests for the production of documents and interrogatories, respectively, which included responses and objections thereto. Lead Plaintiffs also noticed the depositions of six former Everbridge employees, and prepared to take depositions of those individuals. Lead Plaintiffs also prepared to take the deposition of Everbridge's Rule 30(b)(6) deponent.

34. In connection with formal discovery, Defendants produced approximately 201,000 documents (approximately 1,032,000 pages) to Plaintiffs, and Plaintiffs produced approximately 15,000 documents (approximately 102,000 pages) to Defendants. Additionally, third parties produced approximately 6,100 documents (approximately 51,000 pages). In total, approximately 222,100 documents (approximately 1,185,000 pages) were produced by the Parties and third parties in formal discovery.

35. The Parties began exploring the possibility of a negotiated resolution in the Spring of 2026. Specifically, the Parties agreed to participate in a mediation and retained David M. Murphy of Phillips ADR Enterprises to act as the mediator in the case (the "Mediator"). On June 1, 2026, Plaintiffs' Counsel and Defendants' Counsel, among others, participated in a full-day, in-person mediation session before the Mediator. In advance of that session, the Parties submitted detailed mediation statements to the Mediator, together with numerous supporting exhibits.

36. The June 1, 2026 mediation session ended without an agreement being reached. The Parties continued discussions with the Mediator following the mediation to further explore the possibility of a settlement.

37. On June 13, 2026, the Parties accepted the Mediator's double-blind recommendation and, in so agreeing, reached a settlement-in-principle to resolve all claims in the Action, and related claims, on a class-wide basis for $85,000,000 in cash.

38. The Parties' settlement in principle was subsequently memorialized in a confidential term sheet executed and finalized as of July 8, 2026 (the "Term Sheet"), subject to the execution of a customary "long form" stipulation and agreement of settlement and related papers. The Stipulation was executed as of August 10, 2026.

6. What are the reasons for the Settlement?

39. The Court did not finally decide in favor of Lead Plaintiffs or Defendants. Instead, both sides agreed to a settlement. Lead Plaintiffs and Lead Counsel believe that the claims asserted in the Action have merit. They recognize, however, the expense and length of continued proceedings needed to pursue the claims through trial and appeals, as well as the difficulties in establishing liability and damages. Assuming the claims proceeded to trial, the Parties would present factual and expert testimony on each of the disputed issues, and there is risk that the Court or jury would resolve these issues unfavorably against Lead Plaintiffs and the class. In light of the Settlement and the guaranteed cash recovery to the Settlement Class, Lead Plaintiffs and Lead Counsel believe that the proposed Settlement is fair, reasonable, and adequate, and in the best interests of the Settlement Class.

40. Defendants have denied and continue to deny any and all allegations of wrongdoing or liability arising out of any of the conduct, statements, acts or omissions alleged, or that could have been alleged, in the Action, including, but not limited to, all contentions concerning Defendants' business, conduct and public statements, as well as contentions that any such conduct or events constitute wrongdoing or give rise to legal liability. Defendants also have denied and continue to deny, *inter alia*, the allegations that Lead Plaintiffs or Settlement Class Members have suffered damages or were otherwise harmed in any way by any of the Defendants or by the conduct alleged in the Action. Defendants further have asserted and continue to assert that, at all times, they acted in good faith and in a manner they reasonably believed to be in accordance with applicable rules, regulations, and laws. Nonetheless, Defendants have concluded that continuation of the Action would be protracted and expensive, and have taken into account the uncertainty and risks inherent in any litigation, especially a complex case like this Action.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

41. In exchange for the Settlement and the release of the Released Plaintiffs' Claims against the Released Defendant Parties (*see* Question 10 below), Defendants have agreed to pay, or cause the payment of, $85,000,000, which, along with any interest earned, will be distributed, after deduction of Court-awarded attorneys' fees and Litigation Expenses, Notice and Administration Expenses, Taxes, and any other fees or expenses approved by the Court (the "Net Settlement Fund"), to Settlement Class Members who submit valid and timely Claim Forms and are found to be eligible to receive a distribution from the Net Settlement Fund.

8. What might happen if there were no Settlement?

42. If there were no Settlement and Plaintiffs failed to establish any essential legal or factual element of their claims against Defendants, neither Plaintiffs nor the other Settlement Class Members would recover anything from Defendants. Also, if Defendants were successful in proving any of their defenses, either at trial or on appeal, the Settlement Class could recover less than the amount provided in the Settlement, or nothing at all.

9. How can I receive a payment?

43. To qualify for a payment from the Net Settlement Fund, you must submit a timely and valid Claim Form. A Claim Form may be obtained from the websites www.EverbridgeSecuritiesSettlement.com and www.labaton.com or you can submit a claim online at www.EverbridgeSecuritiesSettlement.com. You can also request that a Claim Form be mailed to you by calling the Claims Administrator toll-free at 888-808-1850.

44. Please read the instructions contained in the Claim Form carefully, fill out the form, include all the documents the form requests, sign it, and mail or submit it online to the Claims Administrator so that it is **postmarked or received no later than November 25, 2026.**

10. What am I giving up to receive a payment and by staying in the Settlement Class?

45. If you are a Settlement Class Member and do not timely and validly exclude yourself from the Settlement Class, you will remain in the Settlement Class and that means that, upon the Effective Date of the Settlement, you will release all Released Plaintiffs' Claims against the Released Defendant Parties. All of the Court's orders about the Settlement, whether favorable or unfavorable, will apply to you and legally bind you.

(a) "**Released Plaintiffs' Claims**" means any and all claims and causes of action of every nature and description, whether known or Unknown Claims (as defined herein), suspected or unsuspected, contingent or absolute, mature or not mature, liquidated or unliquidated, accrued or not accrued, concealed or hidden, regardless of legal or equitable theory and whether arising under federal, state, common, or foreign law that Lead Plaintiffs or any other member of the Settlement Class: (a) asserted in the Action or (b) could have asserted in the Action, or in any forum, that arise out of or are based upon both: (i) the allegations, acts, transactions, facts, matters or occurrences, representations or omissions involved, set forth, or referred to in any complaint filed in the Action, and (ii) the purchase or acquisition of Everbridge publicly traded common stock during the Class Period. For the avoidance of doubt, Released Plaintiffs' Claims shall not include claims to enforce the Settlement.

(b) "**Released Defendant Parties**" means Defendants, Jaime Ellertson, and each of their respective former, present or future parents, subsidiaries, divisions, controlling persons, associates, related entities, and affiliates and each and all of their respective present and former employees, members, partners, principals, officers, directors, controlling shareholders, agents, attorneys, advisors (including financial or investment advisors), accountants, auditors, consultants, underwriters, investment bankers, commercial bankers, general or limited partners or partnerships, limited liability companies, members, joint ventures, insurers and reinsurers, predecessors, successors, estates, Immediate Family Members, heirs, executors, trustees, administrators, legal representatives, and assigns, in their capacities as such; and the predecessors, successors, estates, Immediate Family Members, heirs, executors, trustees, administrators, agents, legal representatives, and assigns of each of them, in their capacities as such, as well as any trust of which any Released Defendant Party is the settlor or which is for the benefit of any of their Immediate Family Members.

(c) "**Unknown Claims**" means any and all Released Plaintiffs' Claims that Lead Plaintiffs, or any other Settlement Class Member, does not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Parties, and any and all Released Defendants' Claims that any Defendant does not know or suspect to exist in his, her, or its favor at the time of the release of the Released Plaintiff Parties, which if known by him, her, or it might have affected his, her, or its decision(s) with respect to the Settlement, including the decision to object to the terms of the Settlement or to exclude himself, herself, or itself from the Settlement Class. With respect to any and all Released Plaintiffs' Claims and Released Defendants' Claims, the Parties stipulate and agree that, upon the Effective Date, Lead Plaintiffs and Defendants shall expressly, and each other Settlement Class Member shall be deemed to have, and by operation of the Judgment or Alternative Judgment shall have, to the fullest extent permitted by law, expressly waived and relinquished any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States or foreign law, or principle of common law, which is similar, comparable, or equivalent to Cal. Civ. Code § 1542, which provides:

> **A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.**

Lead Plaintiffs, other Settlement Class Members, or Defendants may hereafter discover facts, legal theories, or authorities in addition to or different from those which any of them now knows or believes to be true with respect to the Action, the Released Plaintiffs' Claims or the Released Defendants' Claims, but Lead Plaintiffs and Defendants shall expressly, fully, finally, and forever settle and release, and each Settlement Class Member shall be deemed to have fully, finally, and forever settled and released, and upon the Effective Date and by operation of the Judgment or Alternative Judgment shall have settled and released, fully, finally, and forever, any and all Released Plaintiffs' Claims and Released Defendants' Claims as applicable, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. Lead Plaintiffs and Defendants acknowledge, and other Settlement Class Members by operation of law shall be deemed to have acknowledged, that the inclusion of "Unknown Claims" in the definition of Released Plaintiffs' Claims and Released Defendants' Claims was separately bargained for and was a material element of the Settlement.

(d) The "**Effective Date**" will occur when an Order entered by the Court approving the Settlement becomes Final and is not subject to appeal (*see* Stipulation at ¶39).

46. Upon the Effective Date, Defendants will also provide a release of any claims against Plaintiffs, the Settlement Class, and Plaintiffs' Counsel in accordance with the terms of the Stipulation.

EXCLUDING YOURSELF FROM THE SETTLEMENT CLASS

47. If you want to keep any right you may have to sue or continue to sue Defendants and the other Released Defendant Parties on your own concerning the Released Plaintiffs' Claims, then you must take steps to remove yourself from the Settlement Class. This is called excluding yourself or "opting out." **Please note: If you decide to exclude yourself from the Settlement Class, there is a risk that any lawsuit you may file to pursue claims alleged in the Action may be dismissed, including because the suit is not filed within the applicable time periods required for filing suit.** Defendants have the option to terminate the Settlement if a certain amount of Settlement Class Members request exclusion.

11. How do I exclude myself from the Settlement Class?

48. To exclude yourself from the Settlement Class, you must mail a signed letter stating that you request to be "excluded from the Settlement Class in *Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc., et al.*, No. 2:22-cv-02249-FWS-RAO (C.D. Cal.)." You cannot exclude yourself by telephone or email. Each request for exclusion must also: (i) state the name, address, telephone number, and email address (if any) of the Person seeking exclusion; (ii) state the date(s), price(s), and number(s) of shares of all purchases and sales of Everbridge publicly traded common stock during the Class Period; (iii) state the number of shares held at the opening of trading on February 18, 2020 and the close of trading on May 25, 2022; and (iv) be signed by the Person requesting exclusion. A request for exclusion must be mailed so that it is **received no later than November 25, 2026** at:

Everbridge Securities Settlement
c/o Verita Global, LLC
EXCLUSIONS
P.O. Box 301170
Los Angeles, CA 90030-1170

49. This information is needed to determine whether you are a member of the Settlement Class. Your exclusion request must comply with these requirements in order to be valid.

50. If you ask to be excluded, do not submit a Claim Form because you cannot receive any payment from the Net Settlement Fund. Also, you cannot object to the Settlement because you will not be a Settlement Class Member and the Settlement will not affect you. If you submit a timely and valid exclusion request, you will not be legally bound by anything that happens in the Action, and you may be able to sue (or continue to sue) Defendants and the other Released Defendant Parties in the future.

12. If I do not exclude myself, can I sue Defendants and the other Released Defendant Parties for the same reasons later?

51. No. Unless you properly exclude yourself, you will give up any rights to sue Defendants and the other Released Defendant Parties for any and all Released Plaintiffs' Claims. If you have a pending lawsuit against any of the Released Defendant Parties, **speak to your lawyer in that case immediately**. You must exclude yourself from this Settlement Class to continue your own lawsuit. Remember, the exclusion deadline is **November 25**, **2026.**

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

52. Labaton Keller Sucharow LLP is Lead Counsel in the Action and represents all Settlement Class Members. You will not be separately charged for these lawyers. The Court will determine the amount of attorneys' fees and Litigation Expenses, which will be paid from the Settlement Fund. If you want to be represented by your own lawyer, you may hire one at your own expense.

14. How will the lawyers be paid?

53. Lead Counsel, together with the other Plaintiffs' Counsel, has been prosecuting the Action on a contingent basis and has not been paid for any of its work. Lead Counsel, on behalf of itself and the other Plaintiffs' Counsel, will seek an attorneys' fee award of no more than 28% of the Settlement Fund, which will include accrued interest. Lead Counsel has agreed to share the awarded attorneys' fees with other Plaintiffs' Counsel. Lead Counsel will also seek payment of Litigation Expenses incurred by Plaintiffs' Counsel in the prosecution of the Action of no more than $675,000, plus accrued interest, which may include an application in accordance with the PSLRA for the reasonable costs and expenses (including lost wages) of Plaintiffs directly related to their representation of the Settlement Class. As explained above, any attorneys' fees and expenses awarded by the Court will be paid from the Settlement Fund.

OBJECTING TO THE SETTLEMENT, THE PLAN OF ALLOCATION, OR THE FEE AND EXPENSE APPLICATION

15. How do I tell the Court that I do not like something about the proposed Settlement?

54. If you are a Settlement Class Member, you can object to the Settlement or any of its terms, the proposed Plan of Allocation of the Net Settlement Fund, and/or Lead Counsel's Fee and Expense Application. You may write to the Court about why you think the Court should not approve any or all of the Settlement terms or related relief. If you would like the Court to consider your views, you must file a proper objection within the deadline, and according to the following procedures.

55. To object, you must send a signed letter stating that you object to the proposed Settlement, the Plan of Allocation, and/or the Fee and Expense Application in "*Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc., et al.*, No. 2:22-cv-02249-FWS-RAO (C.D. Cal.)." The objection must also: (i) state the name, address, telephone number, and email address (if any) of the objector and must be signed by the objector; (ii) state the objection(s) and the specific reasons for each objection, including whether it applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class, and any legal and evidentiary support, and witnesses, the Settlement Class Member wishes to bring to the Court's attention; and (iii) include documents sufficient to show the objector's membership in the Settlement Class, including the number of shares of Everbridge publicly traded common stock purchased and sold during the Class Period, as well as the dates and price per share of each such purchase and/or sale. Objectors who are represented by counsel must also provide the name, address, and telephone number of all counsel, if any, who represent them; the number of times the objector and their counsel have filed an objection to a class action settlement in the last five years; the nature of each such objection in each such case; and the name and docket number of each such case. Unless otherwise ordered by the Court, any Settlement Class Member who does not object in the manner described in this Notice will be deemed to have waived any objection and will be unable to make any objection to the proposed Settlement, the Plan of Allocation, and/or Lead Counsel's Fee and Expense Application.

56. Your objection must be filed with the Court **no later than November 25, 2026 and** be mailed or delivered to the following counsel so that it is **received no later than November 25, 2026:**

Court	**Lead Counsel**	**Defendants' Counsel**
Clerk of the Court U.S. District Court Central District of California Ronald Reagan Federal Building United States Courthouse Courtroom 10D, 10th Floor 411 W. 4th St Santa Ana, CA 92701	**Labaton Keller Sucharow LLP** Michael H. Rogers, Esq. 140 Broadway New York, NY 10005	**Kirkland & Ellis LLP** Jules H. Cantor, Esq. 333 W. Wolf Point Plaza Chicago, IL 60654

57. You do not need to attend the Settlement Hearing to have your written objection considered by the Court. However, any Settlement Class Member who has complied with the procedures described in this Question 15 and below in Question 19 may appear at the Settlement Hearing and be heard about their objection, to the extent allowed by the Court. An objector may appear in person or arrange, at his, her, or its own expense, for a lawyer to represent him, her, or it at the Settlement Hearing.

16. What is the difference between objecting and seeking exclusion?

58. Objecting is telling the Court that you do not like something about the proposed Settlement, Plan of Allocation, or Lead Counsel's Fee and Expense Application. You can still recover money from the Settlement. You can object *only* if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself from the Settlement Class, you have no basis to object because the Settlement and the Action no longer affect you.

THE SETTLEMENT HEARING

17. When and where will the Court decide whether to approve the Settlement?

59. The Court will hold the Settlement Hearing on **December 17, 2026 at 10:00 a.m.** (Pacific Time) at the United States District Court for the Central District of California, Ronald Reagan Federal Building and United States Courthouse, Courtroom 10D, 10th Floor, 411 W. 4th St, Santa Ana, CA 92701.

60. At this hearing, the Honorable Fred W. Slaughter will consider whether: (i) the Settlement is fair, reasonable, adequate, and should be approved; (ii) the Plan of Allocation is fair and reasonable, and should be approved; and (iii) the application for an award of attorneys' fees and payment of Litigation Expenses is reasonable and should be approved. The Court will take into consideration any written objections filed in accordance with the instructions in Question 15 above. We do not know how long it will take the Court to make these decisions.

61. The Court may change the date and time of the Settlement Hearing, or hold the hearing remotely, without another individual notice being sent to Settlement Class Members. If you want to attend the hearing, you should check with Lead Counsel beforehand to be sure that the date and/or time has not changed, or periodically check the Settlement website at www.EverbridgeSecuritiesSettlement.com to see if the Settlement Hearing has stayed as scheduled or has changed.

18. Do I have to come to the Settlement Hearing?

62. No. Lead Counsel will answer any questions the Court may have. But, you are welcome to attend at your own expense. If you submit a valid and timely objection, the Court will consider it and you do not have to come to Court to discuss it. You may have your own lawyer attend (at your own expense), but it is not required. If you do hire your own lawyer, he or she must file and serve a Notice of Appearance in the manner described in the answer to Question 19 below **no later than November 25, 2026**.

19. May I speak at the Settlement Hearing?

63. You may ask the Court for permission to speak at the Settlement Hearing. To do so, you must, **no later than November 25, 2026,** submit a statement that you, or your attorney, intend to appear in "*Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc., et al.*, No. 2:22-cv-02249-FWS-RAO (C.D. Cal.)." If you intend to present evidence at the Settlement Hearing, you must also include in your objections (prepared and submitted according to the answer to Question 15 above) the identities of any witnesses you may wish to call to testify and any exhibits you intend to introduce into evidence at the Settlement Hearing. You may not speak at the Settlement Hearing if you exclude yourself from the Settlement Class or if you have not provided written notice of your intention to speak at the Settlement Hearing in accordance with the procedures described in this Question 19 and in Question 15 above.

IF YOU DO NOTHING

20. What happens if I do nothing at all?

64. If you do nothing and you are a member of the Settlement Class, you will receive no money from this Settlement and you will be precluded from starting a lawsuit, continuing with a lawsuit, or being part of any other lawsuit against Defendants and the other Released Defendant Parties concerning the Released Plaintiffs' Claims. To share in the Net Settlement Fund, you must submit a Claim Form (*see* Question 9 above). To start, continue, or be a part of any other lawsuit against Defendants and the other Released Defendant Parties concerning the Released Plaintiffs' Claims, you must exclude yourself from the Settlement Class (*see* Question 11 above).

GETTING MORE INFORMATION

21. Are there more details about the Settlement?

65. This Notice summarizes the proposed Settlement. More details are in the Stipulation. You can get a copy of the Stipulation, and other documents related to the Settlement, as well as additional information about the Settlement, by visiting the website www.EverbridgeSecuritiesSettlement.com. You may also call the Claims Administrator toll free at 888-808-1850 or write to the Claims Administrator at *Everbridge Securities Settlement,* c/o Verita Global, LLC, P.O. Box 301170, Los Angeles, CA 90030-1170.

66. You may also review the Stipulation filed with the Court, or other documents in the case, during business hours at the Office of the Clerk of the United States District Court for the Central District of California, Ronald Reagan Federal Building and United States Courthouse, 411 W. 4th St, Santa Ana, CA 92701, between 9:00 a.m. and 4:00 p.m. Monday through Friday, excluding Court holidays. (Please check the Court's website, www.cacd.uscourts.gov, for information about Court closures before visiting.) Subscribers to PACER, a fee-based service, can also view the papers filed publicly in the Action through the Court's on-line Case Management/Electronic Case Files System at https://www.pacer.gov.

Please do not call the Court with questions about the Settlement.

PLAN OF ALLOCATION OF THE NET SETTLEMENT FUND

22. How will my claim be calculated?

67. As discussed above, the Settlement Amount and any interest it earns constitute the Settlement Fund. The Settlement Fund, after the deduction of Court-approved attorneys' fees and Litigation Expenses, Notice and Administration Expenses, Taxes, and any other fees or expenses approved by the Court, is the Net Settlement Fund. If the Settlement is approved by the Court, the Net Settlement Fund will be distributed to Authorized Claimants – *i.e.*, members of the Settlement Class who timely submit valid Claim Forms that are accepted for payment – in accordance with the following proposed Plan of Allocation, or such other plan of allocation as the Court may approve. Settlement Class Members who do not timely submit valid Claim Forms will not share in the Net Settlement Fund but will otherwise be bound by the Settlement. The Court may approve this proposed Plan of Allocation, or modify it, without additional individual notice to the Settlement Class. Any order modifying the Plan of Allocation will be posted on www.EverbridgeSecuritiesSettlement.com and www.labaton.com.

68. The objective of this Plan of Allocation is to distribute the Net Settlement Fund equitably among those Settlement Class Members who allegedly suffered economic losses as a result of the alleged violations of the federal securities laws during the Class Period. To design the Plan of Allocation, Lead Counsel conferred with Lead Plaintiffs' consulting damages expert. The Plan of Allocation, however, is not a formal damages analysis. The calculations made pursuant to the Plan of Allocation are not intended to estimate, or be indicative of, the amounts that Settlement Class Members might have been able to recover as damages after a trial. The calculations, including the Recognized Loss formulas, are also not intended to estimate the amounts that will be paid to Authorized Claimants. The computations under the Plan of Allocation are only a method to weigh the claims of Authorized Claimants against one another for the purposes of making *pro rata* allocations of the Net Settlement Fund and the Recognized Claim amounts are the basis upon which the Net Settlement Fund will be proportionately allocated to Authorized Claimants. An individual Settlement Class Member's recovery will depend on, for example: (i) the total number and value of claims submitted; (ii) when the Claimant purchased or acquired Everbridge publicly traded common stock; and (iii) whether and when the Claimant sold his, her, or its Everbridge publicly traded common stock. The Claims Administrator will determine each Authorized Claimant's *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant's "Recognized Claim."

69. For losses to be compensable damages under the federal securities laws, the disclosure of the allegedly misrepresented information must be the cause of the decline in the price of the securities at issue. In this case, Lead Plaintiffs allege that Defendants issued false statements and omitted material facts during the Class Period which allegedly artificially inflated the price of Everbridge common stock. It is alleged that corrective information released to the market after market close on December 9, 2021 and February 24, 2022, negatively impacted the market price of Everbridge common stock on December 10, 2021 and on February 25, 2022 in a statistically significant manner and removed alleged artificial inflation from the price of Everbridge publicly traded common stock on those days. Accordingly, in order to have a compensable loss in this Settlement, Everbridge publicly traded common stock must have been purchased or acquired during the Class Period and held through at least one of the alleged corrective disclosure dates listed above.

CALCULATION OF RECOGNIZED LOSS AMOUNTS

70. For purposes of determining whether a Claimant has a Recognized Claim, purchases, acquisitions, and sales of Everbridge publicly traded common stock will first be matched on a First In/First Out ("FIFO") basis. Class Period sales will be matched first against any holdings at the beginning of the Class Period and then against purchases/acquisitions in chronological order, beginning with the earliest purchase/acquisition made during the Class Period.

71. A "Recognized Loss Amount" will be calculated as set forth herein for each purchase of Everbridge publicly traded common stock during the Class Period (February 18, 2020 through February 24, 2022) that is listed in the Claim Form and for which adequate documentation is provided. To the extent that the calculation of a Claimant's Recognized Loss Amount results in a negative number (a gain), that number shall be set to zero.

72. For each share of Everbridge publicly traded common stock purchased or otherwise acquired during the Class Period and sold before the close of trading on May 25, 2022, an "Out of Pocket Loss" will be calculated. Out of Pocket Loss is defined as the purchase price (excluding all fees, taxes, and commissions) minus the sale price (excluding all fees, taxes, and commissions). To the extent that the calculation of the Out of Pocket Loss results in a negative number (a gain), that number shall be set to zero.

73. The sum of a Claimant's Recognized Loss Amounts will be the Claimant's "Recognized Claim."

74. **For each share of Everbridge publicly traded common stock purchased from February 18, 2020 through and including February 24, 2022, and:**

A. Sold before December 10, 2021, the Recognized Loss Amount for each share shall be zero.

B. Sold from December 10, 2021 through February 24, 2022, the Recognized Loss Amount for each share shall be ***the lesser of***:

i. the alleged dollar artificial inflation applicable to each such share on the date of purchase/acquisition as set forth in **Table 1** below *minus* the alleged dollar artificial inflation applicable to each such share on the date of sale as set forth in **Table 1** below; or

ii. the Out of Pocket Loss.

C. Sold from February 25, 2022 through May 25, 2022, the Recognized Loss Amount for each such share shall be ***the least of***:

i. the alleged dollar artificial inflation applicable to each such share on the date of purchase/acquisition as set forth in Table 1 below; or

ii. the actual purchase/acquisition price of each such share minus the average closing price from February 25, 2022, up to the date of sale as set forth in Table 2 below; or

iii. the Out of Pocket Loss.

D. Held as of the close of trading on May 25, 2022, the Recognized Loss Amount for each such share shall be ***the lesser of***:

i. the alleged dollar artificial inflation applicable to each such share on the date of purchase/acquisition as set forth in Table 1 below; or

ii. the actual purchase/acquisition price of each such share minus $42.16.[3]

TABLE 1

Everbridge Publicly Traded Common Stock
Alleged Artificial Inflation for Purposes of Calculating
Purchase and Sale Inflation

Transaction Date	Alleged Artificial Inflation Per Share
February 18, 2020 - December 9, 2021	$70.76
December 10, 2021 - February 24, 2022	$16.29

TABLE 2

Everbridge Publicly Traded Common Stock
Closing Price and Average Closing Price
February 25, 2022 – May 25, 2022

Date	Closing Price	Average Closing Price From February 25, 2022 to Date Shown		Date	Closing Price	Average Closing Price From February 25, 2022 to Date Shown
2/25/2022	$30.61	$30.61		4/12/2022	$50.50	$41.21
2/28/2022	$39.52	$35.07		4/13/2022	$51.50	$41.51
3/1/2022	$38.29	$36.14		4/14/2022	$49.80	$41.75
3/2/2022	$37.98	$36.60		4/18/2022	$48.58	$41.94
3/3/2022	$36.81	$36.64		4/19/2022	$49.87	$42.15
3/4/2022	$36.46	$36.61		4/20/2022	$48.17	$42.31
3/7/2022	$35.56	$36.46		4/21/2022	$46.63	$42.42
3/8/2022	$36.19	$36.43		4/22/2022	$45.74	$42.51

[3] Pursuant to Section 21D(e)(1) of the Exchange Act, "in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and the mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated to the market." Consistent with the requirements of the Exchange Act, Recognized Loss Amounts are reduced to an appropriate extent by taking into account the closing prices of Everbridge common stock during the "90-day look-back period," February 25, 2022 through May 25, 2022. The mean (average) closing price for Everbridge common stock during this 90-day look-back period was $42.16.

Date	Closing Price	Average Closing Price From February 25, 2022 to Date Shown	Date	Closing Price	Average Closing Price From February 25, 2022 to Date Shown
3/9/2022	$37.22	$36.52	4/25/2022	$47.18	$42.62
3/10/2022	$36.06	$36.47	4/26/2022	$45.35	$42.69
3/11/2022	$32.80	$36.14	4/27/2022	$44.27	$42.72
3/14/2022	$31.45	$35.75	4/28/2022	$45.81	$42.79
3/15/2022	$33.98	$35.61	4/29/2022	$43.10	$42.80
3/16/2022	$36.59	$35.68	5/2/2022	$46.67	$42.88
3/17/2022	$41.35	$36.06	5/3/2022	$46.01	$42.95
3/18/2022	$40.86	$36.36	5/4/2022	$46.89	$43.03
3/21/2022	$42.19	$36.70	5/5/2022	$43.01	$43.03
3/22/2022	$44.01	$37.11	5/6/2022	$39.94	$42.97
3/23/2022	$44.45	$37.49	5/9/2022	$35.82	$42.83
3/24/2022	$45.18	$37.88	5/10/2022	$38.21	$42.74
3/25/2022	$43.05	$38.12	5/11/2022	$36.94	$42.63
3/28/2022	$43.13	$38.35	5/12/2022	$37.63	$42.54
3/29/2022	$46.91	$38.72	5/13/2022	$40.73	$42.51
3/30/2022	$44.96	$38.98	5/16/2022	$38.24	$42.43
3/31/2022	$43.64	$39.17	5/17/2022	$38.61	$42.36
4/1/2022	$44.60	$39.38	5/18/2022	$38.57	$42.30
4/4/2022	$48.19	$39.71	5/19/2022	$40.71	$42.27
4/5/2022	$46.74	$39.96	5/20/2022	$41.18	$42.25
4/6/2022	$46.39	$40.18	5/23/2022	$40.95	$42.23
4/7/2022	$47.45	$40.42	5/24/2022	$39.25	$42.18
4/8/2022	$47.31	$40.64	5/25/2022	$40.91	$42.16
4/11/2022	$49.53	$40.92			

ADDITIONAL PROVISIONS

75. Purchases, acquisitions, and sales of Everbridge common stock shall be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" or "sale" date. The receipt or grant by gift, inheritance, or operation of law of Everbridge common stock during the Class Period shall not be deemed a purchase, acquisition, or sale for the calculation of a Claimant's Recognized Claim, nor shall the receipt or grant be deemed an assignment of any claim relating to the purchase or acquisition of such shares of Everbridge common stock unless: (i) the donor or decedent purchased or otherwise acquired such shares of Everbridge common stock during the Class Period; (ii) no Claim Form was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to such shares of Everbridge common stock; and (iii) it is specifically so provided in the instrument of gift or assignment.

76. In accordance with the Plan of Allocation, the Recognized Loss Amount on any portion of a purchase or acquisition that matches against (or "covers") a "short sale" is zero. The Recognized Loss Amount on a "short sale" that is not covered by a purchase or acquisition is also zero. If a Claimant has an opening short position in Everbridge common stock at the start of the Class Period, the earliest Class Period purchases or acquisitions shall be matched against such opening short position in accordance with the FIFO matching described above and any portion of such purchases or acquisitions that covers such short sales will not be entitled to recovery. If a Claimant newly establishes a short position during the Class Period, the earliest subsequent Class Period purchase or acquisition shall be matched against such short position on a FIFO basis and will not be entitled to a recovery.

77. Everbridge publicly traded common stock purchased or acquired from February 18, 2020 through February 24, 2022, both dates inclusive, is the only security eligible for a recovery under the Plan of Allocation. With respect to Everbridge publicly traded common stock purchased or sold through the exercise of an option, the purchase/sale date of the Everbridge common stock is the exercise date of the option, and the purchase/sale price is the exercise price of the option.

78. An Authorized Claimant's Recognized Claim shall be the amount used to calculate the Authorized Claimant's *pro rata* share of the Net Settlement Fund. If the sum total of Recognized Claims of all Authorized Claimants who are entitled to receive payment out of the Net Settlement Fund is greater than the Net Settlement Fund, each Authorized Claimant shall receive his, her, or its *pro rata* share of the Net Settlement Fund. The *pro rata* share shall be the Authorized Claimant's Recognized Claim divided by the total of Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Net Settlement Fund.

79. If the Net Settlement Fund exceeds the sum total amount of the Recognized Claims of all Authorized Claimants entitled to receive payment out of the Net Settlement Fund, the excess amount in the Net Settlement Fund shall be distributed *pro rata* to all Authorized Claimants entitled to receive payment.

80. The Net Settlement Fund will be allocated among all Authorized Claimants whose prorated payment is $10.00 or greater. If the prorated payment to any Authorized Claimant calculates to less than $10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

81. Settlement Class Members who do not submit acceptable Claim Forms will not share in the distribution of the Net Settlement Fund, however they will nevertheless be bound by the Settlement and the final Judgment of the Court dismissing this Action and related claims.

82. Distributions will be made to Authorized Claimants after all claims have been processed and after the Court has finally approved the Settlement and the Settlement has reached its Effective Date. If there is any balance remaining in the Net Settlement Fund (whether by reason of tax refunds, uncashed checks or otherwise) after at least six (6) months from the date of initial distribution of the Net Settlement Fund, Lead Counsel shall, if feasible and economical after payment of Notice and Administration Expenses, Taxes, and outstanding attorneys' fees and expenses, redistribute such balance among Authorized Claimants who have cashed their checks in an equitable and economic fashion. These redistributions shall be repeated until the balance in the Net Settlement Fund is no longer feasible and economical to distribute. Any balance that still remains in the Net Settlement Fund after re-distribution(s), which is not feasible or economical to reallocate, after payment of Notice and Administration Expenses, Taxes, and any unpaid attorneys' fees and expenses, shall be contributed to the Consumer Federation of America, a non-profit, non-sectarian organization, or such other organization designated by Lead Plaintiffs and approved by the Court.

83. Payment pursuant to the Plan of Allocation, or such other plan as may be approved by the Court, shall be conclusive against all Claimants. No person shall have any claim against Plaintiffs, Plaintiffs' Counsel, their damages expert, the Claims Administrator, or other agent designated by Lead Counsel, arising from determinations or distributions to Claimants made substantially in accordance with the Stipulation, the Plan of Allocation approved by the Court, or further orders of the Court. Plaintiffs, Defendants, Defendants' counsel, and all other Released Defendant Parties shall have no responsibility for or liability whatsoever for the investment or distribution of the Settlement Fund, the Net Settlement Fund, the Plan of Allocation or the determination, administration, calculation, or payment of any Claim Form or non-performance of the Claims Administrator, the payment or withholding of Taxes owed by the Settlement Fund or any losses incurred in connection therewith.

SPECIAL NOTICE TO SECURITIES BROKERS AND NOMINEES

84. If you purchased or otherwise acquired Everbridge publicly traded common stock from February 18, 2020 through February 24, 2022, both dates inclusive, for the beneficial interest of a person or entity other than yourself, the Court has directed that **WITHIN TEN (10) CALENDAR DAYS OF YOUR RECEIPT OF THE POSTCARD NOTICE OR THIS NOTICE**, **YOU MUST EITHER**: (a) provide a list of the names, addresses, and emails (to the extent available) of all such beneficial owners to the Claims Administrator and the Claims Administrator is ordered to send the Postcard Notice promptly to such identified beneficial owners; or (b) **WITHIN TEN (10) CALENDAR DAYS** of receipt of the Postcard Notice or Notice, (i) request from the Claims Administrator sufficient copies of the Postcard Notice to forward to all such beneficial owners, and **WITHIN TEN (10) CALENDAR DAYS** of receipt of those Postcard Notices from the Claims Administrator, mail them to all such beneficial owners; or (ii) email the Postcard Notice or a link to the Postcard Notice to all such beneficial owners. Nominees that elect to mail or email the Postcard Notice to their beneficial owners SHALL ALSO send a statement to the Claims Administrator confirming that the mailing was made and shall retain their mailing records for use in connection with any further notices that may be provided in the Action.

85. Upon FULL AND TIMELY compliance with these directions, such nominees may seek reimbursement of their reasonable expenses incurred in providing notice to beneficial owners of up to: $0.03 per Postcard Notice, plus postage at the current pre-sort rate used by the Claims Administrator, for notices mailed by nominees; or $0.03 per mailing record provided to the Claims Administrator, by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought. Such properly documented expenses incurred by nominees in compliance with the above shall be paid from the Settlement Fund, and any unresolved disputes regarding reimbursement of such expenses shall be subject to review by the Court. All communications concerning the foregoing should be addressed to the Claims Administrator:

Everbridge Securities Settlement
c/o Verita Global, LLC
EXCLUSIONS
P.O. Box 301170
Los Angeles, CA 90030-1170
888-808-1850
www.EverbridgeSecuritiesSettlement.com
info@EverbridgeSecuritiesSettlement.com

Dated: September 15, 2026

BY ORDER OF THE U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, AND SYLEBRA CAPITAL MENLO MASTER FUND, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, v. EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON et al., Defendants.	Case No. 2:22-cv-02249-FWS-RAO CLASS ACTION

PROOF OF CLAIM AND RELEASE FORM

I. GENERAL INSTRUCTIONS

1. To recover as a member of the Settlement Class based on your claims in the class action entitled *Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc., et al.,* No. 2:22-cv-02249-FWS-RAO (C.D. Cal.) (the "Action"), you must complete and, on page 5 below, sign this Proof of Claim and Release form ("Claim Form"). If you fail to submit a timely and properly addressed (as explained in paragraph 2 below) Claim Form, your claim may be rejected and you may not receive any recovery from the Net Settlement Fund created in connection with the proposed Settlement of the Action. Submission of this Claim Form, however, does not ensure that you will share in the proceeds of the Settlement.[1]

2. **THIS CLAIM FORM MUST BE SUBMITTED ONLINE AT WWW.EVERBRIDGESECURITIESSETTLEMENT.COM NO LATER THAN NOVEMBER 25, 2026 OR, IF MAILED, BE POSTMARKED NO LATER THAN NOVEMBER 25, 2026, ADDRESSED AS FOLLOWS:**

Everbridge Securities Settlement
c/o Verita Global, LLC
P.O. Box 301170
Los Angeles, CA 90030-1170

Do not mail or deliver your Claim Form to the Court, the Parties to the Action, or their counsel. Submit your Claim Form only to the Claims Administrator at the address set forth above.

3. If you are a member of the Settlement Class and you have not requested exclusion from the Settlement Class, you will be bound by and subject to the terms of all judgments and orders entered in the Action, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A CLAIM FORM OR RECEIVE A PAYMENT.

4. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained in it and to the genuineness of the documents attached to it, subject to penalties of perjury under the laws of the United States of America. The submission of forged or fraudulent documentation will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

[1] All capitalized terms not defined in this Claim Form have the meanings given in the Stipulation and Agreement of Settlement, dated August 10, 2026 (the "Stipulation"), available at www.EverbridgeSecuritiesSettlement.com.

II. CLAIMANT IDENTIFICATION

5. If you purchased or acquired Everbridge, Inc. ("Everbridge") publicly traded common stock during the period from February 18, 2020 through February 24, 2022, both dates inclusive (the "Class Period"), and held the stock in your name, you are the beneficial and record owner of the shares. If, however, the Everbridge shares were purchased or acquired through a third party, such as a brokerage firm, you are the beneficial owner and the third party is the record owner.

6. Use **Part I** of this form entitled "Claimant Identification" to identify each beneficial owner of Everbridge publicly traded common stock that forms the basis of this claim, as well as the owner of record if different. THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL OWNERS OR THE LEGAL REPRESENTATIVE OF SUCH OWNERS.

7. All joint owners must sign this claim. Executors, administrators, guardians, conservators, legal representatives, and trustees filing this claim must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Security (or taxpayer identification) number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

III. IDENTIFICATION OF TRANSACTIONS

8. Use **Part II** of this form entitled "Schedule of Transactions in Everbridge Publicly Traded Common Stock" to supply all required details of the transaction(s). If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

9. On the schedules, provide all of the requested information with respect to the purchases or acquisitions of Everbridge publicly traded common stock, whether the transactions resulted in a profit or a loss. Failure to report all such transactions may result in the rejection of your claim.

10. The date of covering a "short sale" is deemed to be the date of purchase or acquisition of Everbridge common stock. The date of a "short sale" is deemed to be the date of sale.

11. Copies of broker trade confirmations or other documentation of the transactions must be attached to your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim. **THE PARTIES DO NOT HAVE INFORMATION ABOUT YOUR TRANSACTIONS IN EVERBRIDGE PUBLICLY TRADED COMMON STOCK.**

12. NOTICE REGARDING ELECTRONIC FILES: Certain Claimants with large numbers of transactions may request, or may be asked, to submit information regarding their transactions in electronic files. (This is different than the online claim portal on the Settlement website.) All such Claimants MUST submit a manually signed paper Claim Form whether or not they also submit electronic copies. If you wish to submit your claim electronically, you must contact the Claims Administrator at 888-808-1850 to obtain the required file layout or visit www.EverbridgeSecuritiesSettlement.com. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the Claimant a written acknowledgment of receipt and acceptance of electronically submitted data.

Official Office Use Only

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc., et al.

Case No. 2:22-cv-02249-FWS-RAO

PROOF OF CLAIM AND RELEASE

Must Be Postmarked (if Mailed) or Received (if Submitted Online) No Later Than November 25, 2026

EVS

Please Type or Print in the Boxes Below
Must use Black or Blue Ink or your claim may be deemed deficient.

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.

PART I – CLAIMANT IDENTIFICATION

Last Name | M.I. | First Name

Last Name (Co-Beneficial Owner) | M.I. | First Name (Co-Beneficial Owner)

○ Individual (includes joint owner accounts) ○ Corporation
○ Pension Plan ○ IRA/401k ○ Estate ○ Trust ○ Other (describe):

Entity Name (Beneficial Owner - If Claimant is not an Individual)

Representative or Custodian Name (if Claim is not submitted by Beneficial Owner(s))

Account Number (if filing for multiple accounts, file a separate Claim Form for each account)

Last Four Digits of Social Security Number

or

Taxpayer Identification Number

Telephone Number (Primary Daytime) — —

Telephone Number (Alternate) — —

Email Address

MAILING INFORMATION

Address

Address (cont.)

City | State | ZIP Code

Foreign Province | Foreign Postal Code | Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB	CB	○ ATP ○ KE ○ ICI	○ BE ○ DR ○ EM	○ FL ○ ME ○ ND	○ OP ○ RE ○ SH	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY

PART II – SCHEDULE OF TRANSACTIONS IN EVERBRIDGE PUBLICLY TRADED COMMON STOCK

1. BEGINNING HOLDINGS – State the total number of shares of Everbridge publicly traded common stock held on February 17, 2020. If none, write "0" or "Zero." (Must submit documentation.)

Proof Enclosed? ○ Y ○ N

2. PURCHASES/ACQUISITIONS DURING THE CLASS PERIOD – Separately list each and every purchase and acquisition of Everbridge publicly traded common stock during the period from February 18, 2020 through, and including, February 24, 2022. (Must submit documentation.)

PURCHASES

Date of Purchase/Acquisition (List Chronologically) (Month/Day/Year)	Number of Shares Purchased/ Acquired	Purchase/ Acquisition Price Per Share	Total Purchase/ Acquisition Price (excluding any fees, commissions, and taxes)	Confirm Proof of Purchase/ Acquisition Enclosed
M M / D D / Y Y Y Y		$.	$.	○ Y ○ N
/ /		$.	$.	○ Y ○ N
/ /		$.	$.	○ Y ○ N
/ /		$.	$.	○ Y ○ N

○ IF NONE CHECK HERE

3. PURCHASES/ACQUISITIONS DURING THE 90-DAY LOOKBACK PERIOD – State the total number of shares of Everbridge publicly traded common stock purchased/acquired from February 25, 2022 through the close of trading on May 25, 2022.[2] (Must submit documentation.)

Proof Enclosed? ○ Y ○ N

4. SALES DURING THE CLASS PERIOD AND DURING THE 90-DAY LOOKBACK PERIOD – Separately list each and every sale of Everbridge publicly traded common stock from February 18, 2020 through, and including, the close of trading on May 25, 2022. (Must submit documentation.)

SALES

Date of Sale (List Chronologically) (Month/Day/Year)	Number of Shares Sold	Sale Price Per Share	Total Sale Price (excluding taxes, commissions, and fees)	Confirm Proof of Sale Enclosed
M M / D D / Y Y Y Y		$.	$.	○ Y ○ N
/ /		$.	$.	○ Y ○ N
/ /		$.	$.	○ Y ○ N
/ /		$.	$.	○ Y ○ N

○ IF NONE CHECK HERE

5. ENDING HOLDINGS – State the total number of shares of Everbridge publicly traded common stock held as of the close of trading on May 25, 2022. If none, write "0" or "Zero." (Must submit documentation.)

Proof Enclosed? ○ Y ○ N

○ **IF YOU NEED ADDITIONAL SPACE TO LIST YOUR TRANSACTIONS, YOU MUST PHOTOCOPY THIS PAGE, WRITE YOUR NAME, AND FILL IN THIS CIRCLE.**

[2] Information requested in this Claim Form with respect to purchases/acquisitions from February 25, 2022 through May 25, 2022 is needed only in order for the Claims Administrator to confirm that you have reported all relevant transactions. Purchases/acquisitions during this period, however, are not eligible for a recovery because they are outside the Class Period and will not be used for purposes of calculating Recognized Loss Amounts pursuant to the Plan of Allocation.

IV. SUBMISSION TO JURISDICTION OF THE COURT AND ACKNOWLEDGMENTS

13. By signing and submitting this Claim Form, the Claimant(s) or the person(s) acting on behalf of the Claimant(s) certify(ies) that: I (We) submit this Claim Form under the terms of the Plan of Allocation described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the Central District of California with respect to my (our) claim as a Settlement Class Member(s) and for purposes of enforcing the releases set forth herein. I (We) further acknowledge that, once the Settlement reaches its Effective Date, I (we) will be bound by and subject to the terms of all judgments and orders entered in the Action, including the releases set forth therein. I (We) agree to furnish additional information to the Claims Administrator to support this claim, such as additional documentation for transactions in Everbridge publicly traded common stock and other Everbridge securities, if required to do so. I (We) have not submitted any other claim covering the same transactions in Everbridge publicly traded common stock during the time periods herein and know of no other person having done so on my (our) behalf.

V. RELEASES, WARRANTIES, AND CERTIFICATION

14. I (We) hereby warrant and represent that I am (we are) a Settlement Class Member as defined in the notices, and that I am (we are) not excluded from the Settlement Class.

15. I (we) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever compromise, settle, release, resolve, relinquish, waive, and discharge with prejudice the Released Plaintiffs' Claims as to each and all of the Released Defendant Parties (as these terms are defined in the Notice). This release shall be of no force or effect unless and until the Court approves the Settlement and it becomes effective on the Effective Date.

16. I (We) hereby warrant and represent that I (we) waive the right to a trial by a jury, to the extent one exists, and agree to the determination by the Claims Administrator or the Court of the validity and amount of this Claim, and waive any right of appeal with respect to such determination.

17. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

18. I (We) hereby warrant and represent that I (we) have included information about all purchases, acquisitions, and sales of Everbridge publicly traded common stock that occurred during the relevant time periods and the number of shares held by me (us), to the extent requested.

19. I (We) certify that I am (we are) NOT subject to backup tax withholding. (If you have been notified by the Internal Revenue Service that you are subject to backup withholding, please strike out the prior sentence.)

I (We) declare under penalty of perjury under the laws of the United States of America that all of the foregoing information supplied by the undersigned is true and correct.

Executed this_____ day of _____ in _____
(Month/Year) (City/State/Country)

_____ _____
Signature of Claimant Print Claimant Name Here

_____ _____
Signature of Joint Claimant (if any) Print Name of Joint Claimant (if any)

_____ _____
Signature of person signing on behalf of Claimant Print Name of person signing on behalf of Claimant

_____
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.)

ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME. THANK YOU FOR YOUR PATIENCE.

Reminder Checklist:

1. Sign this Claim Form. If this Claim Form is on behalf of joint Claimants, then both must sign.
2. DO NOT HIGHLIGHT THE CLAIM FORM OR YOUR SUPPORTING DOCUMENTATION.
3. Attach only copies of supporting documentation as these documents will not be returned to you.
4. Keep a copy of your Claim Form for your records.
5. The Claims Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed submitted until you receive an acknowledgment postcard. If you do not receive an acknowledgment postcard within 60 days, please call the Claims Administrator toll free at 888-808-1850 or email at info@EverbridgeSecuritiesSettlement.com.
6. If you move after submitting this Claim Form, please notify the Claims Administrator of the change in your address, otherwise you may not receive additional notices or payment.
7. If you have any questions or concerns regarding your Claim, contact the Claims Administrator by email at info@EverbridgeSecuritiesSettlement.com, or toll-free at 888-808-1850, or you may visit www.EverbridgeSecuritiesSettlement.com. DO NOT call Everbridge or its counsel with questions regarding your claim.

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR MAILED NO LATER THAN NOVEMBER 25, 2026, ADDRESSED AS FOLLOWS:

Everbridge Securities Settlement
c/o Verita Global, LLC
P.O. Box 301170
Los Angeles, CA 90030-1170
www.EverbridgeSecuritiesSettlement.com

Exhibit C

P2JW272000-0-B00600-16CDF63078D

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NEW HIGHS AND LOWS

WSJ.com/newhighs

The following explanations apply to the New York Stock Exchange, NYSE Arca, NYSE American and Nasdaq Stock Market stocks that hit a new 52-week intraday high or low in the latest session. **%** **CHG**-Daily percentage change from the previous trading session.

Monday, September 28, 2026

Highs

Stock	Sym	52-Wk Hi/Lo	% Chg
AMC Ent	AMC	3.40	11.9
AbCelleraBio	ABCL	14.23	9.6
AbleViewGlobal	ABLV	1.70	28.1
AcmeUnited	ACU	64.18	1.6
AeriesTech	AERT	7.66	1.8
Agenus	AGEN	9.71	10.4
AgilentTechs	A	176.02	1.4
AlgonquinNt2079	AQNB	26.27	-0.6
AmerFinDeb2060	AFGD	22.86	...
ArmadaAcqnII	XRPN	13.67	...
ArtTechAcqn	ARTC	10.02	0.5
Atkore	ATKR	94.72	...
AtlantaBravesC	BATRK	54.86	0.1
AtlantaBravesA	BATRA	59.61	1.0
BRC Nts 2026	RILYN	25.26	...
Biodesix	BDSX	31.97	4.5
Biogen	BIIB	230.49	0.5
BioLifeSolns	BLFS	39.76	1.7
BluerockAcqnII	BRRKU	10.05	-0.2
CSLM Digital III	KOYN	10.25	0.1
CareDx	CDNA	65.50	1.4
Cinemark	CNK	39.07	1.6
ColumbusAcqn	COLA	12.95	1.8
DivrsHlthcrNts42	DHCNI	17.55	-1.2
DrugsMadeInAm	DMAA	10.88	0.4
FirstSeacoastBncp	FSEA	17.25	0.1
Flexsteel	FLXS	90.65	-2.1
ForefrontTech	FTHA	9.99	0.1
GRAIL	GRAL	134.42	4.5
Genmab	GMAB	35.70	0.1
GlobaTerraA	GTERA	10.45	0.3
GlobalIndl	GIC	42.49	2.0
GreenlandMnWt	GRMLW	1.25	-10.8
HarvardAveA	HAVA	10.24	0.2
HireQuest	HQI	20.84	-1.5
Hongli	HLP	2.48	8.1
Imax	IMAX	57.73	0.1
Innospec	IOSP	100.48	-0.9
IovanceBiotherap	IOVA	11.17	-0.1
JJill	JILL	25.00	-1.7
JerashHldgs	JRSH	5.97	3.9
KodiakSciences	KOD	95.77	178.0
Marygold	MGLD	2.12	2.1
Materialise	MTLS	8.61	1.8
Mettler-Toledo	MTD	1545.45	2.2
Natera	NTRA	417.38	-0.2
NewEraEnerWt	NUAIW	3.95	0.6
OrionEnergySys	OESX	31.32	-0.4
PershingSquare	PS	59.94	5.4
ProemAcqnlWt	PAACW	0.51	...
ProemAcqnl	PAACU	10.64	4.8
ProtoLabs	PRLB	97.80	0.7
Pyrophyte II A	PAII	10.33	0.3
Repligen	RGEN	198.87	2.3
SAIHEAT	SAIH	33.00	3.8
SB Financial	SBFG	32.93	0.4
SCIIAcqnA	SCII	10.17	0.2
SVRN	SVRN	61.45	10.1
Securitize	SECZ	17.01	4.2
SightSciences	SGHT	9.34	3.8
SouthernCrossI	NCO	9.93	0.1
10xGenomics	TXG	89.95	3.3
TwistBiosci	TWST	187.87	-1.8
TwoHarborsNts30	TWOD	26.31	...
VendomeAcqnl	VNME	10.31	0.4
VulcanInfrandPwN26	GREEL	25.35	0.2
Waters	WAT	445.48	2.2

Lows

Stock	Sym	52-Wk Hi/Lo	% Chg
AccessNewswire	ACCS	4.70	-1.9
AcresCmclPfdC	ACRpC	23.33	-1.1
AcresCmclPfdD	ACRpD	18.15	-0.2
ADIGlbDistr	ADIG	17.88	-5.2
ADT	ADT	6.15	-3.3
Adtran	ADTN	6.76	-4.6
AECOM	ACM	58.08	-2.4
AGI	AGBK	5.70	-2.2
AGNC Invt	AGNC	9.43	-1.7
AIM Immuno	AIM	0.18	-3.0
AMASSBrands	AMSS	0.55	-12.9
Amerisafe	AMSF	23.20	1.1
ARCGroupAcqnlRt	ARCLR	0.13	-4.2
ArkoPetroleum	APC	15.75	-0.7
ARS Pharm	SPRY	4.00	1.2
ASP Isotopes	ASPI	2.51	-11.1
AXIS CapPfdE	AXSpE	17.65	-0.1
abrdnIncmPfdA	ACPpA	17.89	-1.8
AccendraHealth	ACH	0.64	-8.2
ActuateTherap	ACTU	0.60	8.3
AdagioMedical	ADGM	0.16	-12.5
ADARxPharm	ADRX	18.50	3.8
AddexTherap	ADXN	2.56	-23.0
AerSale	ASLE	5.22	-1.5
Afya	AFYA	12.03	-7.4
AgreeRealtyPfdA	ADCpA	15.38	-0.6
AirshipAIWt	AISPW	0.33	-5.6
AksoHealth	AHG	0.70	-2.5
AlaunosTherap	TCRT	0.97	-6.4
AlgonquinPower	AQN	4.96	0.2
Algorhythm	RIME	0.15	6.0
AlkamiTech	ALKT	13.35	-3.0
AlphaModusA	AMOD	1.55	-4.8
Amentum	AMTM	18.48	-3.6
AmHomes4RentPfdG	AMHpG	20.40	1.3
AmHomes4RentPfdH	AMHpH	21.62	3.0
AmerVanguard	AVD	1.78	-4.3
AmerCarMart	CRMT	1.01	-2.8
AngelOakMtgREIT	AOMR	7.34	-2.4
AntalphaPlatfm	ANTA	2.54	-10.6
Aon	AON	270.00	-2.1
ApolloComRlEst	ARI	6.15	-0.6
ArborRealty	ABR	3.87	1.2
ArborRealtyPfdD	ABRpD	14.70	-1.6
ArborRealtyPfdE	ABRpE	14.51	-1.7
AresCmclRlEst	ACRE	4.09	-1.9
ArmourResREIT	ARR	13.76	-0.9
ArmourResPfdC	ARRpC	18.74	-2.6
ArrayDigitalInfr	AD	33.43	-3.0
ArrayDigiNts2070	UZF	16.13	-0.9
ArrayDigiNts2069	UZD	17.75	-0.4
ArriveAI	ARAI	0.19	-4.9
AscentagePharma	AAPG	14.55	0.2
AspenInsPfd	AHLpE	17.28	-0.2
AspenInsPfd	AHLpF	22.29	-1.5
AssdBancPfdE	ASBpE	19.16	-0.3
AthenePfdB	ATHpB	17.00	-0.4
AthenePfdA	ATHpA	23.12	-0.9
AthenePfdD	ATHpD	15.00	-0.7
AtlasLithium	ATLX	2.50	-6.7
AtriumTherap	RNA	8.05	1.6
AutoNation	AN	161.33	-3.4
Avista	AVA	34.53	-0.9
BCE	BCE	20.46	-2.0
BWX Tech	BWXT	133.90	-3.0
Baidu	BIDU	86.29	-0.4
BancroftFdPfdA	BCVpA	19.15	-1.9
BankOZKPfdA	OZKAP	14.67	-0.8
BankofAmNt66	MERpK	23.35	-0.2
BankofAmPfdHH	BACpK	21.86	-0.8
BankofAmPfdGG	BACpB	22.38	-0.6
BkofHawaiiPfdA	BOHpA	15.06	-0.9
BanzaiIntl	PARA	0.65	0.6
BarfreshFood	BRFH	0.81	-10.2
BaselMedical	BMGL	3.45	-6.2
BellRing	BRBR	7.59	-2.1
BelpointePrep	OZ	41.77	-4.1
BetterHome&Fin	BETR	9.95	-3.5
BeyondAir	XAIR	2.38	-9.1
BeyondMeat	BYND	8.07	2.0
BinahCapital	BCG	1.10	...
BiofronteraWt	BFRIW	0.01	-32.5
BioRestorative	BRTX	2.29	-9.4
Biote	BTMD	1.15	0.8
BlkRkCapAllocTrmRt	BCATrw	0.01	-36.7
BlackstoneDigital	BXDC	17.95	-5.0
BlackstoneMtg	BXMT	12.23	-0.7
Bloomia	TULP	2.87	-3.3
BluerockHomes	BHM	7.87	-0.9
BoeingPfdA	BApA	58.42	-5.3
BoydGaming	BYD	69.03	-2.9
BoydGroupServices	BGSI	77.81	-1.9
BraemarHtls	BHR	1.64	-1.8
BrasilAgro	LND	3.43	...
BraveheartBio	BRVE	20.01	2.2
BreadFinHldgsInc	BFHpB	24.30	-1.2
BridgeBioOncology	BBOT	3.79	-3.5
BridgerAerospace	BAER	0.74	-5.4
BrightSpire	BRSP	3.97	-0.7
Brookfield	BN	36.20	-1.6
BrookfieldRenew	BEPC	27.63	-1.8
BrookWealth	BNT	36.17	-1.6
Bumble	BMBL	2.52	-4.9
CDT Equity	CDT	0.07	-5.0
CHS PfdB2	CHSCN	24.21	-1.5
CHS PfdB3	CHSCM	23.42	-1.3
CISO Global	CISO	0.20	-13.7
CMSEnerDeb78	CMSA	19.09	-0.5
CRH	CRH	82.17	-1.5
CabalettaBio	CABA	1.98	-3.4
CableOne	CABO	12.33	-14.2
Cadre	CDRE	25.64	-1.3
Calix	CALX	32.35	0.2
CanFiteBiopharm	CANF	2.14	3.1
CanadianSolar	CSIQ	10.34	-3.5
CapitalOnePfdI	COFpI	16.60	-0.8
CapitalOnePfdJ	COFpJ	15.91	-0.7
CapitalOnePfdK	COFpK	15.53	-1.4
CapitalOnePfdL	COFpL	14.68	-1.5
CapitalOnePfdN	COFpN	14.48	-0.8
Cardlytics	CDLX	3.11	-4.8
Carlyle	CG	38.72	-1.3
CarlyleNts2061	CGABL	15.10	-1.2
CatheterPrec	VTAK	0.13	-4.6
Cemtrex	CETX	1.98	...
CenturyCasinos	CNTY	1.05	-4.5
SchwabPfdJ	SCHWpJ	15.83	-0.7
CharterComms	CHTR	110.35	-1.3
CharterCommPfdA	CHTRP	22.00	0.9
ChathamLodgPfd	CLDTpA	19.30	-1.4
Cheche	CCG	8.20	-12.2
CheetahNetSupply	CTNT	3.50	-23.8
ChimeraInvt	CIM	10.05	-1.6
ChimeraInvPfdA	CIMpA	19.42	-0.4
ChurchillDowns	CHDN	74.92	-5.1
CitizensFinPfdE	CFGpE	16.80	-1.2
CitizensFinPfdH	CFGpH	25.00	0.2
CitizensFinlPfdI	CFGpI	23.93	-0.5
CitroTech	CITR	3.74	-12.0
Clorox	CLX	80.84	-2.8
Cloudastructure	CSAI	2.36	-26.1
CoastalFinl	CCB	35.56	-16.2
CogentComm	CCOI	7.28	-3.4
CollegersIntl	CIGI	87.36	-0.6
ConexeuSciences	CNXU	3.69	-3.1
ConnectBio	CNTB	1.05	...
ConsldWater	CWCO	27.23	-1.2

Continued on Page B10

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CLASS ACTION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, AND SYLEBRA CAPITAL MENLO MASTER FUND, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON et al.,

Defendants.

Case No. 2:22-cv-02249-FWS-RAO

CLASS ACTION

SUMMARY NOTICE OF PENDENCY AND PROPOSED SETTLEMENT OF CLASS ACTION, AND MOTION FOR ATTORNEYS' FEES AND EXPENSES

To: All persons and entities who or which purchased or otherwise acquired the publicly traded common stock of Everbridge, Inc. ("Everbridge") during the period from February 18, 2020 through February 24, 2022, both dates inclusive (the "Class Period"), and were allegedly damaged thereby (the "Settlement Class").

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Central District of California, that Court-appointed Lead Plaintiffs, on behalf of themselves and all members of the proposed Settlement Class, and defendants Everbridge, David Meredith, and Patrick Brickley (collectively, "Defendants"), have reached a proposed settlement of the above-captioned class action (the "Action") in the amount of $85,000,000 (the "Settlement"). Defendants deny any liability or wrongdoing.

A hearing will be held before the Honorable Fred W. Slaughter on December 17, 2026 at 10:00 a.m. (Pacific Time) at the United States District Court, Central District of California, Ronald Reagan Federal Building and United States Courthouse, 411 West 4th Street, Courtroom 10D, 10th Floor, Santa Ana, California 92701 (the "Settlement Hearing") to determine whether the Court should: (i) approve the proposed Settlement as fair, reasonable, and adequate; (ii) dismiss the Action with prejudice as provided in the Stipulation and Agreement of Settlement, dated August 10, 2026; (iii) for purposes of the Settlement only, finally certify the Settlement Class, finally certify Plaintiffs as Class Representatives for the Settlement Class, and finally appoint the law firms of Labaton Keller Sucharow LLP and Robbins Geller Rudman & Dowd LLP as Co-Class Counsel for the Settlement Class; (iv) approve the proposed Plan of Allocation for distribution of the proceeds of the Settlement (the "Net Settlement Fund") to Settlement Class Members; and (v) approve Lead Counsel's Fee and Expense Application. The Court may change the date of the Settlement Hearing, or hold it remotely, without providing another notice. You do NOT need to attend the Settlement Hearing in order to receive a distribution from the Net Settlement Fund.

IF YOU ARE A MEMBER OF THE SETTLEMENT CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE PROPOSED SETTLEMENT AND YOU MAY BE ENTITLED TO A MONETARY PAYMENT. If you have not yet received a Postcard Notice, you may obtain copies of the Postcard Notice, long-form Notice, and Claim Form by visiting the website, www.EverbridgeSecuritiesSettlement.com, or by contacting the Claims Administrator at:

Everbridge Securities Settlement
c/o Verita Global, LLC
P.O. Box 301170
Los Angeles, CA 90030-1170
888-808-1850
www.EverbridgeSecuritiesSettlement.com
info@EverbridgeSecuritiesSettlement.com

Inquiries, other than requests for copies of notices or about the status of a claim, may also be made to Lead Counsel:

LABATON KELLER SUCHAROW LLP
Michael H. Rogers, Esq.
140 Broadway
New York, NY 10005
www.labaton.com
settlementquestions@labaton.com
888-219-6877

If you are a Settlement Class Member, to be eligible to share in the distribution of the Net Settlement Fund, you must submit a Claim Form postmarked or submitted online ***no later than November 25, 2026***. If you are a Settlement Class Member and do not timely submit a valid Claim Form, you will not be eligible to share in the distribution of the Net Settlement Fund, but you will nevertheless be bound by all judgments or orders entered by the Court relating to the Settlement, whether favorable or unfavorable.

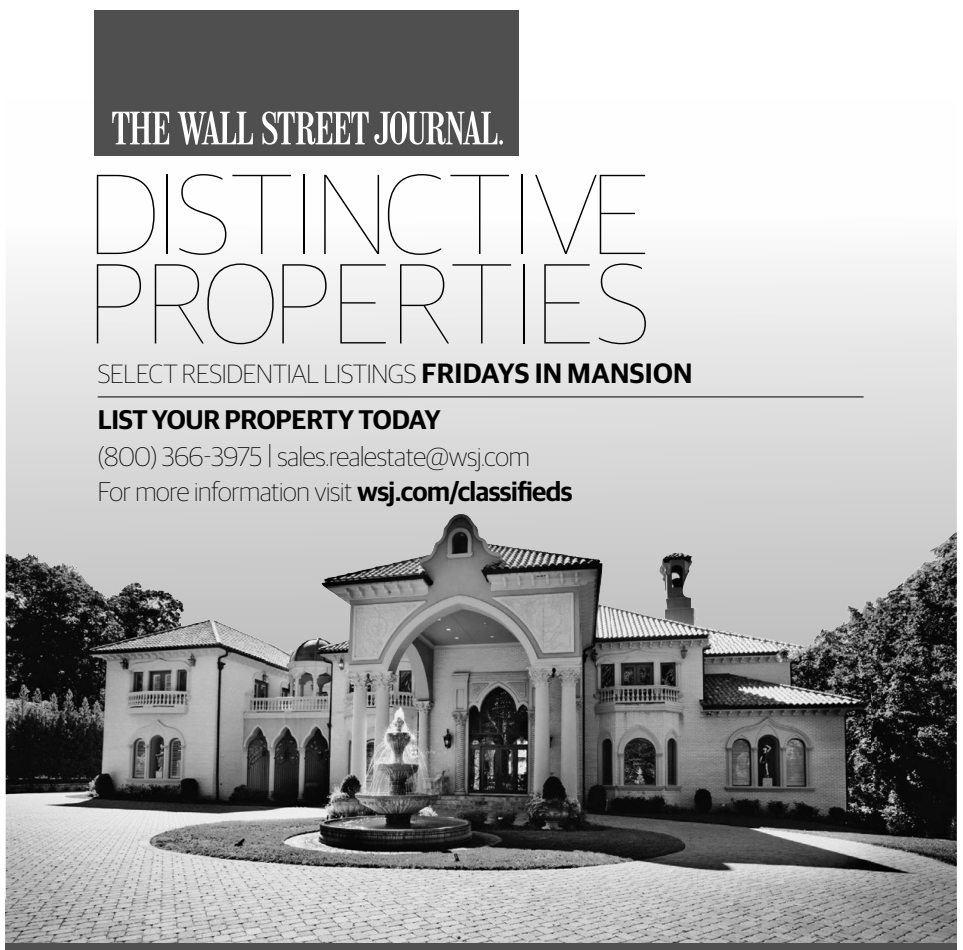
If you are a Settlement Class Member and wish to exclude yourself from the Settlement Class, you must submit a written request for exclusion in accordance with the instructions set forth in the Notice available on the Settlement website, and such request must be received ***no later than November 25, 2026***. If you properly exclude yourself from the Settlement Class, you will not be bound by any judgments or orders entered by the Court relating to the Settlement, whether favorable or unfavorable, and you will not be eligible to share in the distribution of the Net Settlement Fund.

Any objections to the proposed Settlement, Lead Counsel's Fee and Expense Application, and/or the proposed Plan of Allocation must be filed with the Court, either by mail or in person, and be mailed to counsel for the Parties in accordance with the instructions in the long-form Notice available on the website, such that they are received ***no later than November 25, 2026***.

PLEASE DO NOT CONTACT THE COURT, DEFENDANTS, OR DEFENDANTS' COUNSEL REGARDING THIS NOTICE.

DATED: September 29, 2026

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA



Bonds | wsj.com/market-data/bonds/benchmarks

Global Government Bonds: Mapping Yields

Yields and spreads over or under U.S. Treasurys on benchmark two-year and 10-year government bonds in selected other countries; arrows indicate whether the yield rose(▲) or fell (▼) in the latest session

Coupon (%)	Country/ Maturity, in years	Latest	Yield (%)	Previous	Month ago	Year ago	Spread Under/Over U.S. Treasurys, in basis points: Latest	Prev	Year ago
4.750	U.S. 2	4.922 ▲		4.862	4.348	3.646			
4.625	10	5.241 ▲		5.180	4.721	4.185			
2.250	Australia 2	5.069 ▲		5.023	4.698	3.534	13.6	15.5	-11.3
4.250	10	5.428 ▲		5.375	5.090	4.396	18.0	21.0	22.0
2.400	France 2	3.644 ▲		3.599	3.091	2.259	-128.	-126.9	-138.8
3.700	10	4.776 ▲		4.726	4.117	3.576	-47.2	-44.0	-60.0
2.700	Germany 2	3.310 ▲		3.277	2.905	2.039	-162.3	-159.1	-160.8
3.000	10	3.650 ▲		3.600	3.296	2.754	-159.8	-156.5	-142.2
2.650	Italy 2	3.591 ▲		3.558	3.115	2.263	-134.	-131.0	-138.4
3.800	10	4.601 ▲		4.541	4.096	3.587	-64.7	-62.4	-58.9
1.700	Japan 2	1.978 ▲		1.937	1.703	0.929	-295.5	-293.1	-271.8
2.700	10	3.100 ▲		3.072	2.928	1.659	-214.8	-209.3	-251.7
2.400	Spain 2	3.390 ▲		3.373	2.952	2.132	-154.4	-149.5	-151.5
3.400	10	4.149 ▲		4.109	3.712	3.251	-110	-105.6	-92.5
4.375	U.K. 2	4.887 ▲		4.692	4.409	4.040	-4.6	-17.6	39.3
1.125	10	5.422 ▲		5.355	5.070	4.757	17.4	19.0	58.1

Source: Tullett Prebon, Tradeweb FTSE U.S. Treasury Close

Corporate Debt

Prices of firms' bonds reflect factors including investors' economic, sectoral and company-specific expectations

Investment-grade spreads that tightened the most...

Issuer	Symbol	Coupon (%)	Yield (%)	Maturity	Spread*, in basis points: Current	One-day change	Last week
Cooperatieve Rabobank	...	5.189	5.31	Sept. 25, '29	32	-9	n.a.
TR Finance	...	5.850	6.53	April 15, '40	130	-8	n.a.
Hartford Insurance Group*	HIG	6.100	6.37	Oct. 1, '41	114	-6	113
PPL Electric Utilities	...	6.250	6.13	May 15, '39	89	-6	94
Goldman Sachs	GS	6.750	6.55	Oct. 1, '37	131	-5	126
Barrick	...	5.950	6.32	Oct. 15, '39	108	-4	n.a.
AstraZeneca	AZN	6.450	5.92	Sept. 15, '37	68	-4	66
Home Depot	HD	5.875	5.87	Dec. 16, '36	63	-4	62

...And spreads that widened the most

Issuer	Symbol	Coupon (%)	Yield (%)	Maturity	Current	One-day change	Last week
SkyMiles IP	...	4.750	5.10	Oct. 20, '28	18	11	26
Wells Fargo*	WFC	4.650	6.73	Nov. 4, '44	112	10	105
Volkswagen Group of America Finance	...	4.750	5.72	Nov. 13, '28	80	9	71
Blue Owl Credit Income	...	6.250	6.96	June 15, '29	194	8	172
Banco Santander*	...	5.439	5.78	July 15, '31	73	7	63
BMW US Capital	...	4.900	5.67	Aug. 6, '29	66	6	59
BPCE	...	2.700	5.66	Oct. 1, '29	65	6	n.a.
Boston Scientific	BSX	6.250	5.89	Nov. 15, '35	66	6	n.a.

High-yield issues with the biggest price increases...

Issuer	Symbol	Coupon (%)	Yield (%)	Maturity	Bond Price as % of face value: Current	One-day change	Last week
Yum! Brands	YUM	6.875	6.64	Nov. 15, '37	101.824	0.01	104.431

...And with the biggest price decreases

Issuer	Symbol	Coupon (%)	Yield (%)	Maturity	Current	One-day change	Last week
Transocean International	...	6.800	7.93	March 15, '38	91.626	-1.78	94.510
Xerox	...	4.800	21.86	March 1, '35	35.547	-1.63	37.500
Paramount Global*	...	5.500	8.95	May 15, '33	83.000	-1.49	88.000
Telecom Italia Capital	...	7.721	6.72	June 4, '38	108.000	-1.01	111.501
Occidental Petroleum	OXY	6.450	6.24	Sept. 15, '36	101.564	-0.87	104.432
AAdvantage Loyalty IP	...	5.750	6.24	April 20, '29	98.840	-0.54	99.698
Rakuten Group	...	9.750	6.82	April 15, '29	106.728	-0.53	107.712
ADT Security	...	4.875	6.79	July 15, '32	90.953	-0.47	92.752

*Estimated spread over 2-year, 3-year, 5-year, 10-year or 30-year hot-run Treasury; 100 basis points=one percentage pt.; change in spread shown is for Z-spread.
Note: Data are for the most active issue of bonds with maturities of two years or more

Source: MarketAxess

Borrowing Benchmarks | wsj.com/market-data/bonds/benchmarks

Money Rates

September 28, 2026

Key annual interest rates paid to borrow or lend money in U.S. and international markets. Rates below are a guide to general levels but don't always represent actual transactions.

Inflation

	Aug. index level	Chg From (%) July '26	Chg From (%) Aug. '25
U.S. consumer price index			
All items	334.980	0.32	3.4
Core	338.041	0.27	2.4

International rates

	Latest	Week ago	52-Week High	52-Week Low
Prime rates				
U.S.	7.00	7.00	7.25	6.75
Canada	4.45	4.45	4.70	4.45
Japan	2.375	2.375	2.375	1.875
Policy Rates				
Euro zone	2.65	2.65	2.65	2.15
Switzerland	0.25	0.25	0.50	0.25
Britain	3.75	3.75	4.00	3.75
Australia	4.35	4.35	4.35	3.60
Overnight repurchase				
U.S.	3.93	3.89	4.30	3.49

U.S. government rates

	Latest	Week ago	52-Week High	52-Week Low
Discount	4.00	4.00	4.25	3.75

Key Interest Rates

Data are annualized on a 360-day basis. Treasury yields are per annum, on actively traded noninflation and inflation-indexed issues that are adjusted to constant maturities. Data are from weekly Federal Reserve release H.15.

	Week Ended Sep 25	Sep 18	52-Week High	52-Week Low
Federal funds (effective)	3.88	3.63	4.11	3.62
Commercial paper				
Nonfinancial				
1-month	3.95	3.93	4.06	3.61
2-month	4.01	3.98	4.01	3.58
3-month	4.08	4.05	4.08	3.62
Financial				
1-month	3.99	n.a.	4.09	3.60
2-month	4.11	n.a.	4.11	3.62
3-month	4.08	n.a.	4.08	3.62
Discount window primary credit	4.00	4.00	4.25	3.75
Treasury yields at constant maturities				
1-month	3.99	3.95	4.21	3.67
3-month	4.20	4.12	4.20	3.63
6-month	4.30	4.20	4.30	3.56
1-year	4.48	4.41	4.48	3.43
2-year	4.80	4.70	4.80	3.42
3-year	4.91	4.78	4.91	3.45
5-year	4.93	4.83	4.93	3.58
7-year	5.00	4.90	5.00	3.77
10-year	5.08	4.99	5.08	4.00
20-year	5.44	5.37	5.44	4.54
Treasury yields (secondary market)				
1-month	3.84	3.81	4.05	3.55
3-month	4.05	3.98	4.05	3.53
6-month	4.19	4.10	4.19	3.48
TIPS				
5-year	2.60	2.47	2.60	1.17
7-year	2.66	2.54	2.66	1.47
10-year	2.74	2.64	2.74	1.71
20-year	2.98	2.90	2.98	2.14
Long-term avg	3.11	3.05	3.11	2.28

Notes on data:
Federal-funds rate is an average for the seven days ended Wednesday, weighted according to rates on broker trades; **Commercial paper rates** are discounted offer rates interpolated from sales by discounted averages of dealer bid rates on nationally traded certificates of deposit; **Discount window primary credit rate** is charged for discounts made and advances extended under the Federal Reserve's primary credit discount window program; **rate** is average for seven days ended Wednesday; **Inflation-indexed long-term TIPS** average is indexed and is based on the unweighted average bid yields for all TIPS with remaining terms to maturity of 10 years or more;

Sources: Federal Reserve; for additional information on these rate data and their derivation, please see, https://www.federalreserve.gov/datadownload/Build.aspx?rel=H15

Federal funds

	Latest	Week ago	52-Week High	52-Week Low
Effective rate	3.8900	3.8900	4.1100	3.6300
High	3.9500	3.9500	4.2000	3.7000
Low	3.8000	3.8000	4.0800	3.5500
Bid	3.8800	3.8800	4.1000	3.6100
Offer	3.8900	3.8900	4.1200	3.6300

Treasury bill auction

	Latest	Week ago	52-Week High	52-Week Low
4 weeks	3.850	3.820	4.080	3.550
13 weeks	4.110	4.015	4.110	3.540
26 weeks	4.285	4.155	4.285	3.475

Other short-term rates

	Latest	Week ago	52-Week high	52-Week low
Call money	5.75	5.75	6.00	5.50
Commercial paper (AA financial)				
90 days	n.a.	n.a.	4.07	3.57
Secured Overnight Financing Rate	3.90	3.85	4.31	3.50

	Latest	Value Traded	52-Week High	52-Week Low
DTCC GCF Repo Index				
Treasury	3.905	94.370	4.319	3.504
MBS	3.928	98.832	4.371	3.517

Weekly survey

	Latest	Week ago	Year ago
Freddie Mac			
30-year fixed	7.03	6.95	6.30
15-year fixed	6.42	6.26	5.49

Notes on data:
U.S. prime rate is the base rate on corporate loans posted by at least 70% of the 10 largest U.S. banks, and is effective September 17, 2026. **Other prime rates** aren't directly comparable; lending practices vary widely by location; **Discount rate** is effective September 17, 2026. **Secured Overnight Financing Rate** is as of September 25, 2026. **DTCC GCF Repo Index** is Depository Trust & Clearing Corp.'s weighted average for overnight trades in applicable CUSIPs. Value traded is in billions of U.S. dollars. **Federal-funds rates** are Tullett Prebon rates as of 3:30 p.m. ET.

Sources: Federal Reserve; Bureau of Labor Statistics; DTCC; FactSet; Tullett Prebon Information, Ltd.

Labaton Keller Sucharow LLP Announces Proposed Settlement in the Everbridge Securities Settlement

NEWS PROVIDED BY
Labaton Keller Sucharow LLP →
Sep 29, 2026, 08:00 ET

NEW YORK, Sept. 29, 2026 /PRNewswire/ -- The following statement is being issued by Labaton Keller Sucharow LLP regarding the Everbridge Securities Settlement:

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, AND SYLEBRA CAPITAL MENLO MASTER FUND, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, v. EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON et al., Defendants.	Case No. 2:22-cv-02249-FWS-RAO CLASS ACTION

SUMMARY NOTICE OF PENDENCY AND PROPOSED SETTLEMENT OF CLASS ACTION, AND MOTION FOR ATTORNEYS' FEES AND EXPENSES

To: All persons and entities who or which purchased or otherwise acquired the publicly traded common stock of Everbridge, Inc. ("Everbridge") during the period from February 18, 2020 through February 24, 2022, both dates inclusive (the "Class Period"), and were allegedly damaged thereby (the "Settlement Class").

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Central District of California, that Court-appointed Lead Plaintiffs, on behalf of themselves and all members of the proposed Settlement Class, and defendants Everbridge, David Meredith, and Patrick Brickley (collectively, "Defendants"), have reached a proposed settlement of the above-captioned class action (the "Action") in the amount of $85,000,000 (the "Settlement"). Defendants deny any liability or wrongdoing.

A hearing will be held before the Honorable Fred W. Slaughter on December 17, 2026 at 10:00 a.m. (Pacific Time) at the United States District Court, Central District of California, Ronald Reagan Federal Building and United States Courthouse, 411 West 4th Street, Courtroom 10D, 10th Floor, Santa Ana, California 92701 (the "Settlement Hearing") to determine whether the Court should: (i) approve the proposed Settlement as fair, reasonable, and adequate; (ii) dismiss the Action with prejudice as provided in the Stipulation and Agreement of Settlement, dated August 10, 2026; (iii) for purposes of the Settlement only, finally certify the Settlement Class, finally certify Plaintiffs as Class Representatives for the Settlement Class, and finally appoint the law firms of Labaton Keller Sucharow LLP and Robbins Geller Rudman & Dowd LLP as Co-Class Counsel for the Settlement Class; (iv) approve the proposed Plan of Allocation for distribution of the proceeds of the Settlement (the "Net Settlement Fund") to Settlement Class Members; and (v) approve Lead Counsel's Fee and Expense Application. The Court may change the date of the Settlement Hearing, or hold it remotely, without providing another notice. You do NOT need to attend the Settlement Hearing in order to receive a distribution from the Net Settlement Fund.

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Everbridge Securities Settlement
c/o Verita Global, LLC
P.O. Box 301170
Los Angeles, CA 90030-1170
888-808-1850
www.EverbridgeSecuritiesSettlement.com
info@EverbridgeSecuritiesSettlement.com

Inquiries, other than requests for copies of notices or about the status of a claim, may also be made to Lead Counsel:

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Michael H. Rogers, Esq.
140 Broadway
New York, NY 10005
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settlementquestions@labaton.com
888-219-6877

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Any objections to the proposed Settlement, Lead Counsel's Fee and Expense Application, and/or the proposed Plan of Allocation must be filed with the Court, either by mail or in person, and be mailed to counsel for the Parties in accordance with the instructions in the long-form Notice available on the website, such that they are received ***no later than November 25, 2026***.

PLEASE DO NOT CONTACT THE COURT, DEFENDANTS, OR DEFENDANTS' COUNSEL REGARDING THIS NOTICE.

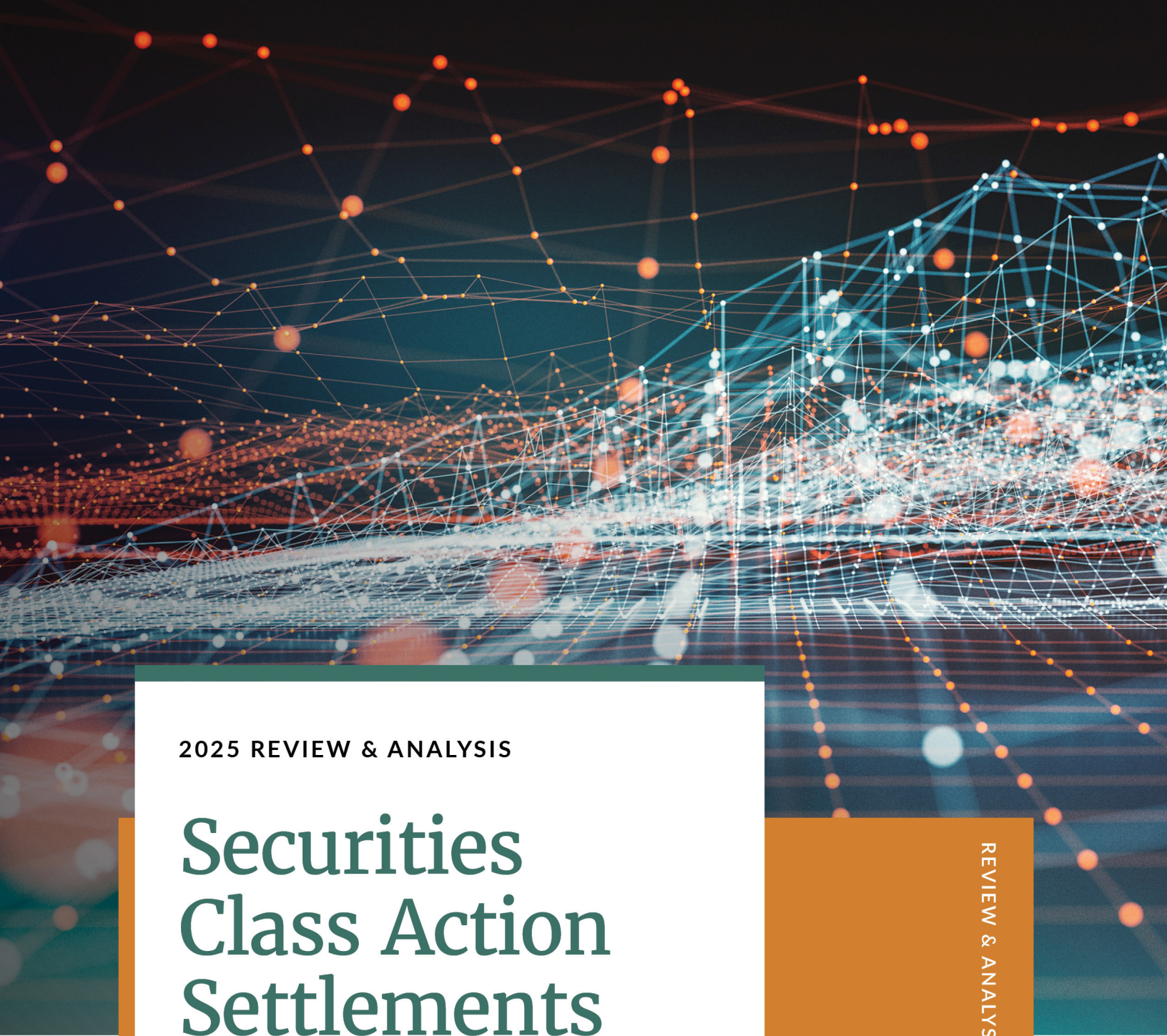
DATED: September 29, 2026

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Media Contact: Janel Laughlin 212-907-0700

SOURCE Labaton Keller Sucharow LLP

Exhibit 5



2025 REVIEW & ANALYSIS

Securities Class Action Settlements

REVIEW & ANALYSIS

CORNERSTONE RESEARCH
Economic and Financial Consulting and Expert Testimony

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2025 Highlights

While the number of securities class action settlements declined 16% from 2024, the median settlement amount grew by 20%, driven by an increase in settlement sizes for cases with only Securities Act of 1933 ('33 Act) claims.

In 2025, there were 74 securities class action settlements totaling $3.0 billion, compared to 88 settlements totaling $3.8 billion in 2024. (page 3)

The median settlement amount of $17.3 million was the highest since 1997. For cases with only '33 Act claims, the median settlement amount more than tripled year-over-year to a historic high of $32.5 million. Excluding cases with only '33 Act claims, the median settlement amount increased 11% from 2024 to $16.0 million. (page 5)

The average settlement amount ($40.6 million) decreased 7% from 2024, which reflects in part mega settlements (of $100 million or greater) that were smaller compared to those in recent years. (page 5)

Median plaintiff-style damages for cases with Section 10(b) claims[1] were flat year-over-year.[2] (page 6)

Median statutory damages for cases with only '33 Act claims declined 19%. (page 8)

Defendant firms involved in 2025 settlements were 9% smaller, as measured by median total assets, reflecting an eight-year low. (page 6)

The median "time to settle" (duration of case from filing to settlement hearing) of 3.5 years continues to be historically elevated, in line with the median in 2023–2024 (3.4 years). (page 13)

Health Care and Financials/Real Estate have historically been the industry sectors with the largest share of settlement dollars. However, in 2025, settlement dollars for these sectors declined to 10-year lows. (page 4)

Figure 1: Settlement Statistics
(Dollars in millions)

	2016–2024	2024	2025
Number of Settlements	752	88	74
Total Amount	$38,135.6	$3,833.8	$3,006.5
Minimum	$0.4	$0.6	$0.3
Median	$12.1	$14.4	$17.3
Average	$50.7	$43.6	$40.6
Maximum	$3,849.7	$503.3	$433.5

Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

Author Commentary

FINDINGS

Securities class action settlement activity declined in 2025 as measured by the 16% drop in the number of settled cases. Aggregate settlement dollars were also lower, reflecting in part mega settlements that were significantly smaller compared to prior years.

The median settlement amount, however, reached a historic high, even though median plaintiff-style damages—a proxy for the amount of potential investor losses that plaintiffs may claim in a securities class action with Rule 10b-5 claims—remained essentially unchanged from 2024.

The higher median settlement amount in 2025 is attributable in part to larger settlements for cases with only '33 Act claims. The median settlement amount for cases with only '33 Act claims surged to a historic high of $32.5 million in 2025, despite a decrease in median statutory damages. One factor that may explain these larger settlements is that these cases may have been unusually complex; the median number of docket entries—a proxy for the time and effort expended by the litigants and/or case complexity—was at an all-time high.

Eric Tam, Principal at Cornerstone Research

"The shift of settlement dollars from the Health Care and Financials/Real Estate sectors to the Communication Services/Information Technology sectors in recent years may reflect changes in case filing trends."

Only nine settlements (12%) were related to special purpose acquisition companies (SPACs), down from 17 such settlements (19%) in 2024.

Laarni T. Bulan, Vice President at Cornerstone Research

"Median plaintiff-style damages stayed flat as the median size (measured by total assets) of issuer defendants declined 9% from 2024. In contrast, the median settlement amount reached the highest level since 1997, due in part to larger '33 Act only settlements."

For the second year in a row, the median ($11.0 million) and average ($31.4 million) settlement amounts for SPAC cases were substantially smaller than the corresponding amounts for non-SPAC cases. The smaller number of SPAC-related settlements may also have contributed to the higher median settlement amount in 2025.

Longer-term settlement trends are potentially evolving across industry sectors. While the Health Care and Financials/Real Estate sectors had the largest aggregate settlement dollars and number of mega settlements during 2016–2020, the Communication Services/Information Technology sectors took the lead in the most recent five-year period.

LOOKING AHEAD

The lower number of settled cases compared to prior years may continue given the relatively stable number of securities case filings in the first half of this decade. In addition, COVID-19-related cases, while comprising a large percentage of filings in 2022–2023, have been dismissed at a high rate.[3] On the other hand, several large settlements pending court approval may boost aggregate settlement dollars in 2026.

Total Settlement Dollars

In 2025, total settlement dollars declined by 22%, consistent with a 16% decline in the number of settled cases from the prior year.

Mega settlements (of $100 million or greater) that were smaller compared to those in recent years also contributed to the lower total settlement dollars. While the number of mega settlements (eight) increased by one from 2024, the average mega settlement in 2025 was $200 million, down 33% from the prior year.

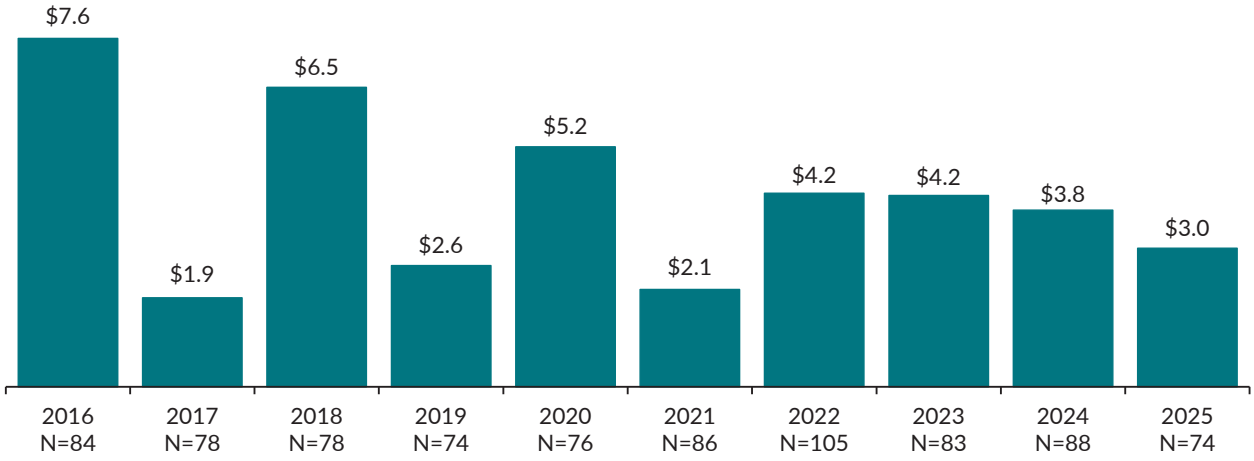
−22%

Change in total settlement dollars from 2024 to 2025

−16%

Change in number of settled cases from 2024 to 2025

Figure 2: Total Settlement Dollars
2016–2025
(Dollars in billions)



Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. "N" refers to the number of settlements.

Figure 3: Mega Settlements
(Dollars in millions)

Year	Number of Mega Settlements	Number of Mega Settlements as a Percentage of All Settlements	Total Mega Settlement Dollars as a Percentage of All Settlement Dollars	Median Mega Settlement	Average Mega Settlement
2016–2024	56	7%	65%	$214	$441
2024	7	8%	54%	$205	$298
2025	8	11%	53%	$144	$200

Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. Mega settlements are defined as total settlement funds of $100 million or greater before adjusting for inflation.

Industry Sectors

Consistent with case filing trends, Health Care and Financials/Real Estate represent the industry sectors with the largest share of settlement dollars over the last 10 years (2016–2025).[4] However, total settlement dollars in the Health Care and Financials/Real Estate sectors in 2025 declined by 56% and 37%, respectively, year-over-year and reached their lowest levels in the past 10 years.

For the fourth time in the past five years, settlement dollars in the Communication Services/Information Technology sectors were greater than any other industry sector.

See Appendix 1 for additional analysis of settlements by industry sectors.

Figure 4: Total Settlement Dollars by Year and Industry Sectors
2016–2025
(Dollars in Millions)

Year	Communication Services/ Information Technology	Consumer Discretionary	Consumer Staples	Energy/ Materials	Financials/ Real Estate	Health Care	Industrials	Utilities
2016	$239	$712	$63	$422	$3,192	$2,903	$29	$2
2017	$134	$206	$4	$429	$434	$614	$106	$4
2018	$572	$246	$54	$3,863	$1,129	$437	$117	$81
2019	$135	$802	$247	$611	$167	$504	$164	$0
2020	$609	$469	$77	$112	$1,432	$1,940	$333	$240
2021	$715	$32	$65	$164	$212	$574	$229	$120
2022	$1,318	$621	$259	$175	$188	$1,169	$466	$7
2023	$453	$278	$504	$202	$1,663	$735	$134	$183
2024	$1,281	$570	$225	$224	$164	$853	$517	$0
2025	$705	$664	$121	$502	$104	$377	$511	$23
2016–2025	$6,162	$4,599	$1,621	$6,703	$8,683	$10,107	$2,607	$661
		$0–$249	$250–$749	$750–$1,499	$1,500+			

Note: Industry sectors are based on the Global Industry Classification Standard (GICS). Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

Figure 5: Number of Settlements by Year and Industry Sectors
2016–2025

Year	Communication Services/ Information Technology	Consumer Discretionary	Consumer Staples	Energy/ Materials	Financials/ Real Estate	Health Care	Industrials	Utilities
2016	18	12	1	11	10	26	5	1
2017	16	10	2	10	14	14	11	1
2018	23	8	3	2	8	24	8	2
2019	10	13	4	5	10	22	10	0
2020	14	10	4	6	7	24	10	1
2021	23	5	3	10	8	26	8	3
2022	18	16	5	7	10	30	18	1
2023	16	8	4	10	12	22	10	1
2024	19	9	5	11	12	21	11	0
2025	19	10	4	6	7	19	8	1
2016–2025	176	101	35	78	98	228	99	11
		0–4	5–14	15–24	25+			

Note: Industry sectors are based on the Global Industry Classification Standard (GICS).

Settlement Size

The median settlement amount in 2025 was $17.3 million, a 20% increase from 2024 and the highest since 1997.

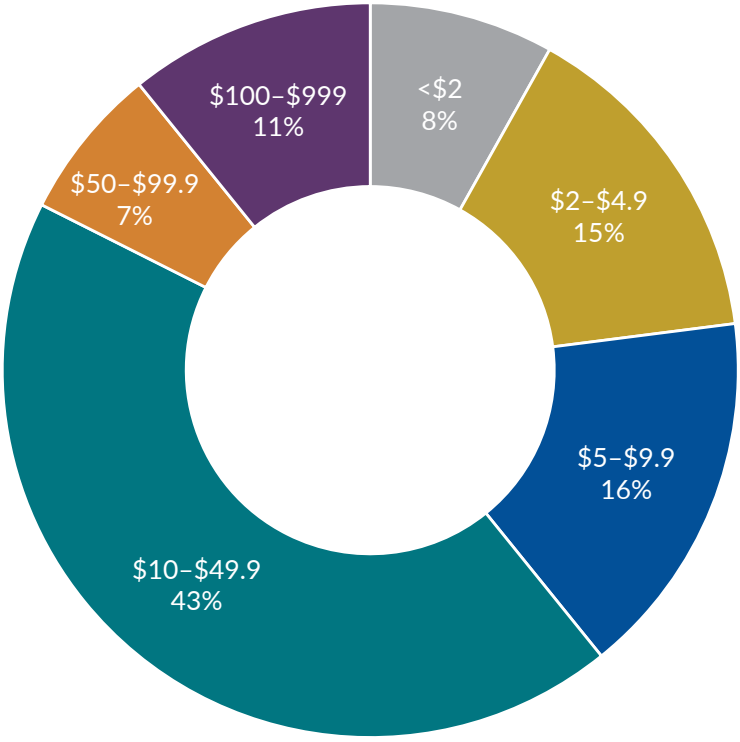
The average settlement amount of $40.6 million declined 7% from 2024, reflecting in part the smaller mega settlements in 2025.

The proportion of settlements involving issuers that had been delisted from a major exchange and/or declared bankruptcy prior to settlement increased from 15% in 2024 to 23% in 2025. The number of settled cases related to SPACs declined nearly 50% from 2024 to nine such cases in 2025. The median and average settlement amounts for these cases were $11.0 million and $31.4 million, respectively, compared to $19.5 million and $41.9 million for non-SPAC cases in 2025.

Settlements in the $10 million to $50 million range accounted for 43% of settlements in 2025.

See Appendix 2 for a distribution of settlement amounts.

Figure 6: Proportion of Settled Cases by Settlement Dollar Range
2025
(Dollars in millions)



Note: Percentages indicate the proportion of settled cases in the given settlement dollar range. Percentages may not sum to 100% due to rounding.

Type of Claim and Potential Investor Losses

RULE 10B-5 CLAIMS AND PLAINTIFF-STYLE DAMAGES

For cases with Rule 10b-5 claims, Cornerstone Research's analysis finds a proxy for potential investor losses—referred to here as plaintiff-style damages—to be the most important determinant of settlement outcomes based on regression analysis. However, plaintiff-style damages do not represent actual economic losses borne by shareholders. Determining any such economic losses for a given case requires more in-depth analysis.

–0.6%

Change in median plaintiff-style damages from 2024 to 2025

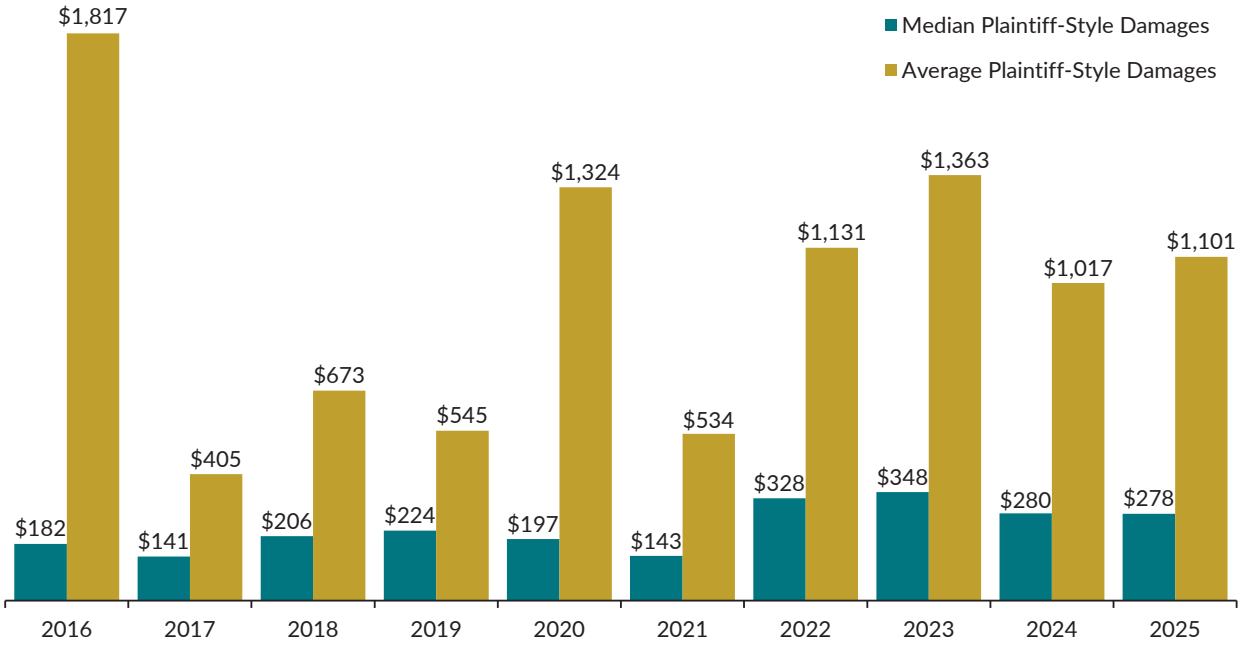
$16.0 million

Median settlement for cases with Rule 10b-5 claims in 2025

In 2025, median plaintiff-style damages were essentially unchanged year-over-year and remained at the elevated levels observed in recent years.

Median total assets of issuer defendants decreased 9% from 2024 to an eight-year low.

Figure 7: Median and Average Plaintiff-Style Damages
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: Plaintiff-style damages are adjusted for inflation based on class period end dates and are estimated for common stock/ADR/ADS only; 2025 dollar equivalent figures are presented. Plaintiff-style damages are estimated for cases that allege a claim under Rule 10b-5 (whether alone or in addition to other claims).

Larger cases, as measured by plaintiff-style damages, typically settle for a smaller percentage of those damages.

In 2025, nearly 40% of settlements were in the Ninth Circuit, the highest percentage since 1999. The median settlement as a percentage of plaintiff-style damages (4.7%) was the lowest ever observed for Ninth Circuit settlements.

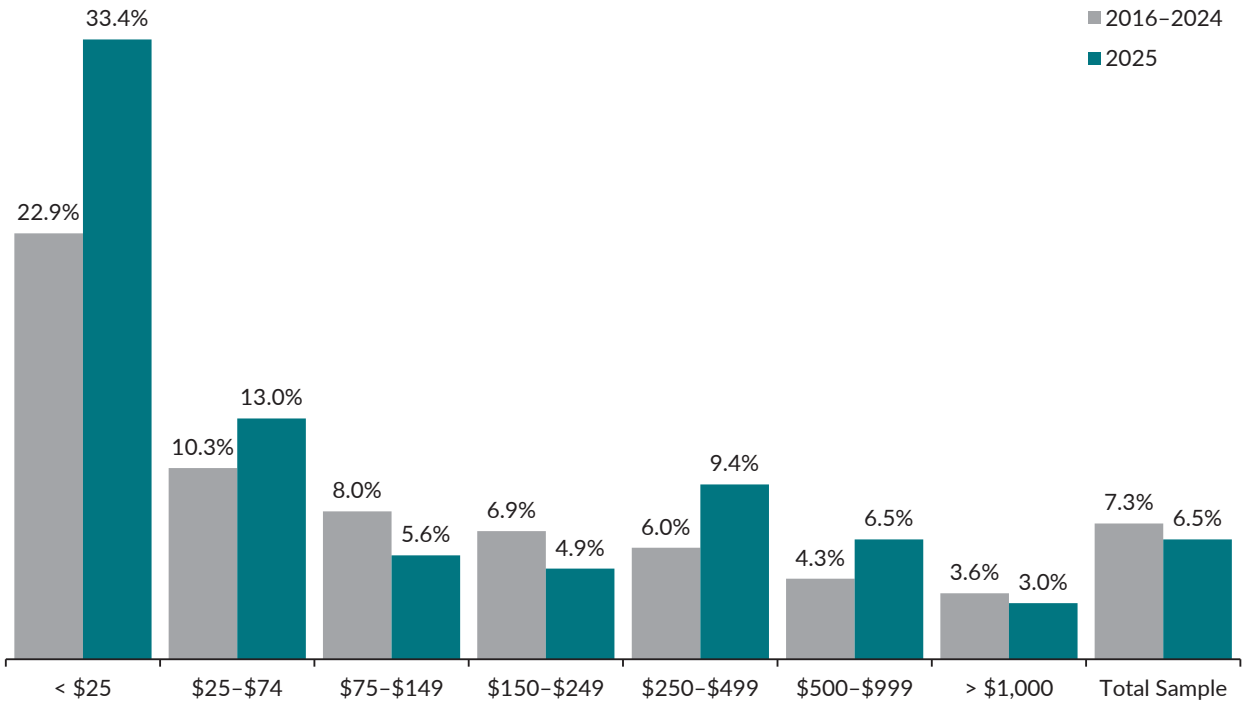
For the second year in a row, the Second Circuit comprised 23% of settlements in 2025, below the prior nine-year average (2016–2024) of 28%. The median settlement as a percentage of plaintiff-style damages (11.9%) was the highest observed in the Second Circuit since 2019.

The median settlement as a percentage of plaintiff-style damages for issuers in the Financials/Real Estate industry sector was 9.9% over the past 10 years, higher than the median of 6.8% for issuers in all other industry sectors.

In 2025, the median settlement as a percentage of plaintiff-style damages was 6.5%—a decrease from 2024 (7.0%) and lower than the 2016–2024 median (7.3%).

See Appendix 3 and Appendix 4 for more information on settlements as a percentage of plaintiff-style damages and settlement statistics by federal circuit court, respectively.

Figure 8: Median Settlement as a Percentage of Plaintiff-Style Damages by Damages Ranges
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: Plaintiff-style damages are adjusted for inflation based on class period end dates and are estimated for common stock/ADR/ADS only; 2025 dollar equivalent figures are presented. Plaintiff-style damages are estimated for cases that allege a claim under Rule 10b-5 (whether alone or in addition to other claims).

'33 ACT CLAIMS AND STATUTORY DAMAGES

For cases with only '33 Act claims—those involving Section 11 and/or Section 12(a)(2) claims and no Rule 10b-5 claims—potential investor losses (referred to here as "statutory damages") are estimated based on the difference between the statutory purchase and sales prices for those shares that are assumed to be traceable to the registration statement at issue.[5]

There were nine settlements with only '33 Act claims in 2025, of which six cases involved an initial public offering (IPO).

−19%

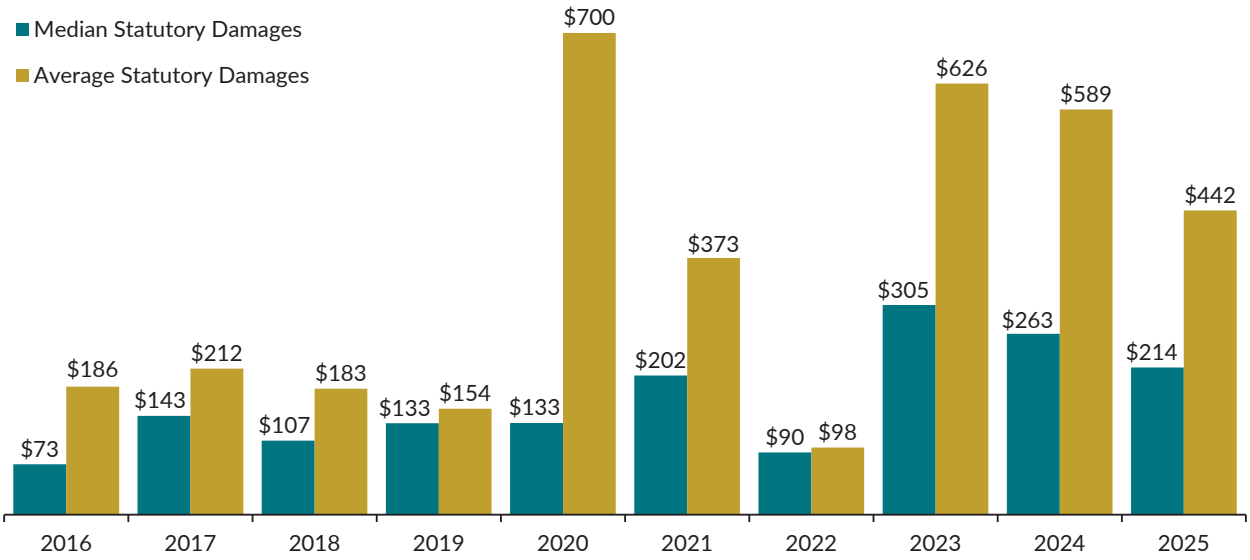
Change in median statutory damages from 2024 to 2025

$32.5 million

Median settlement for cases with only '33 Act claims in 2025

The median settlement amount for cases with only '33 Act claims ($32.5 million) reached an all-time high in 2025 and was 3.1 times the median for the prior nine years.

Figure 9: Median and Average Statutory Damages
2016–2025, Settlements with Only '33 Act Claims
(Dollars in millions)



Note: Statutory damages are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis excludes cases that allege Rule 10b-5 claims.

In 2025, the median settlement as a percentage of statutory damages (12.9%) reached its highest level since 2018.

Similarly, the median number of docket entries for cases with only '33 Act claims reached an all-time high in 2025. This is consistent with the historically high median settlement and the increase in median settlement as a percentage of statutory damages for these cases. Cornerstone Research's analysis finds that the number of docket entries—a proxy for the time and effort expended by the litigants and/or case complexity—is positively associated with settlement amounts.

See Appendix 5 and Appendix 6 for additional information on statutory damages and settlement as a percentage of statutory damages, respectively.

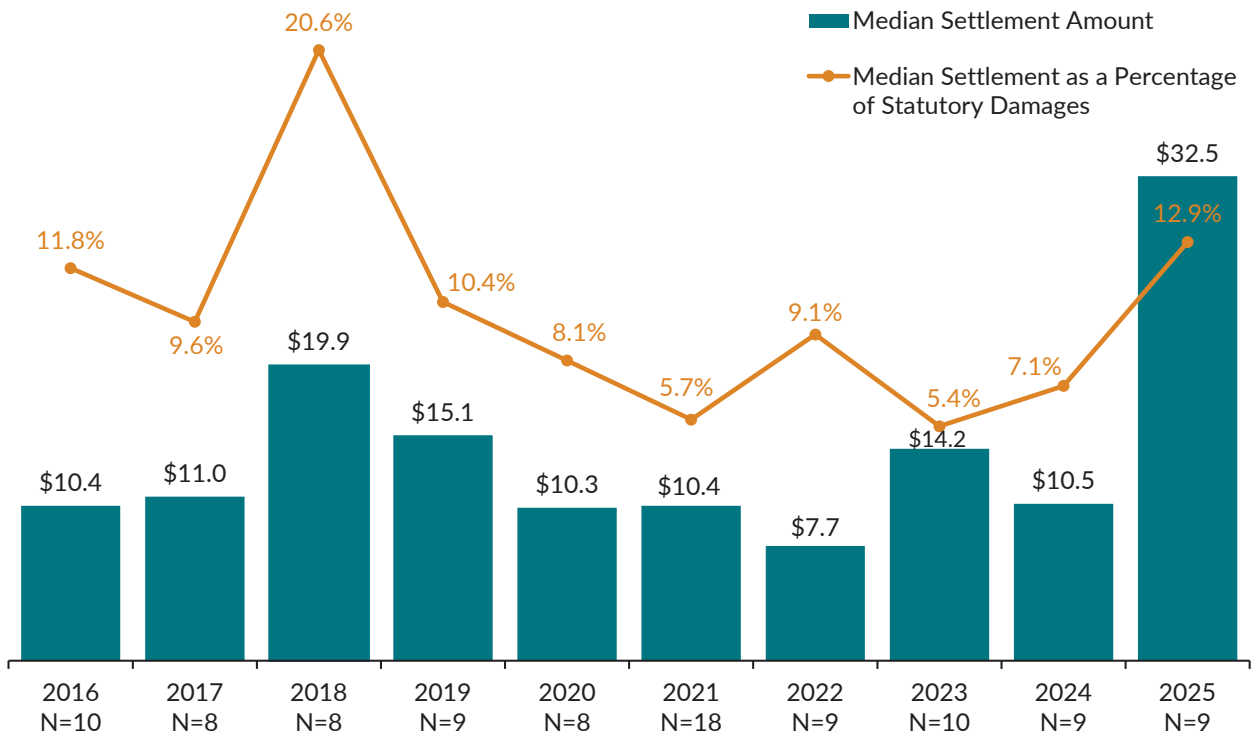
12.9%

Median settlement as a percentage of statutory damages in 2025

206

Median number of docket entries for cases with only '33 Act claims in 2025

Figure 10: Median Settlement Amount and Settlement as a Percentage of Statutory Damages
2016–2025, Settlements with Only '33 Act Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis excludes cases that allege Rule 10b-5 claims.

Analysis of Settlement Characteristics

GAAP VIOLATIONS

This analysis examines allegations of GAAP violations in settlements of securities class actions with Rule 10b-5 claims, including two subcategories of GAAP violations—financial restatements and accounting irregularities.[6]

The percentages of settled cases involving GAAP violations generally and financial restatements specifically have declined substantially in the past five years (2021–2025) compared to the prior five years (2016–2020).

While cases with accounting irregularities comprised only a small proportion of total settled cases between 2016 and 2025, the median settlement amount for cases with Rule 10b-5 claims involving accounting irregularities was $32 million, significantly higher than the $13 million median for cases without such allegations.

For additional details regarding securities class action settlements that involve accounting allegations, see Cornerstone Research's forthcoming annual report on *Accounting Class Action Filings and Settlements*.[7]

Figure 11: Percentage of Settled Cases Involving Accounting Allegations

	2016–2020	2021–2025
GAAP Violations	50%	37%
Financial Restatements	24%	14%
Accounting Irregularities	3%	1%
Auditor Codefendant	7%	3%

Note: This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

DERIVATIVE ACTIONS

Securities class actions often involve an accompanying (parallel) derivative action with similar claims, and all else being equal, such cases have historically settled for higher amounts than securities class actions without an accompanying derivative matter.[8]

In 2025, the median settlement for cases with an accompanying derivative action declined by 16% from the 2024 median.

For more information on settlement outcomes of the accompanying derivative actions, see Cornerstone Research's *Parallel Derivative Action Settlement Outcomes*.[9]

49%

Percentage of 2025 cases involving an accompanying derivative action

$16.0 million

Median settlement for 2025 cases involving an accompanying derivative action

Figure 12: Median Settlement Amount for Cases with an Accompanying Derivative Action
2016–2025
(Dollars in millions)

Year	With Accompanying Derivative Action	Without Accompanying Derivative Action	Percentage of Cases with Accompanying Derivative Action
2016	$16.1	$11.4	41.7%
2017	$5.9	$8.2	47.4%
2018	$23.8	$7.7	51.3%
2019	$12.3	$17.6	54.1%
2020	$19.3	$10.6	53.9%
2021	$10.0	$8.9	41.9%
2022	$15.5	$12.1	44.8%
2023	$20.6	$13.2	41.0%
2024	$19.1	$10.4	52.3%
2025	$16.0	$19.8	48.6%
2016–2025	**$15.1**	**$11.0**	**47.5%**

Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

INSTITUTIONAL INVESTORS

Institutional investors are often involved as lead or co-lead plaintiff in larger cases,[10] that is, cases with higher plaintiff-style damages and higher issuer defendant total assets.

In 2025, settlements involving an institutional investor as lead or co-lead plaintiff had median plaintiff-style damages and median total assets that were 4.1 times and 5.6 times higher, respectively, than the median values for cases without an institutional investor in that role.

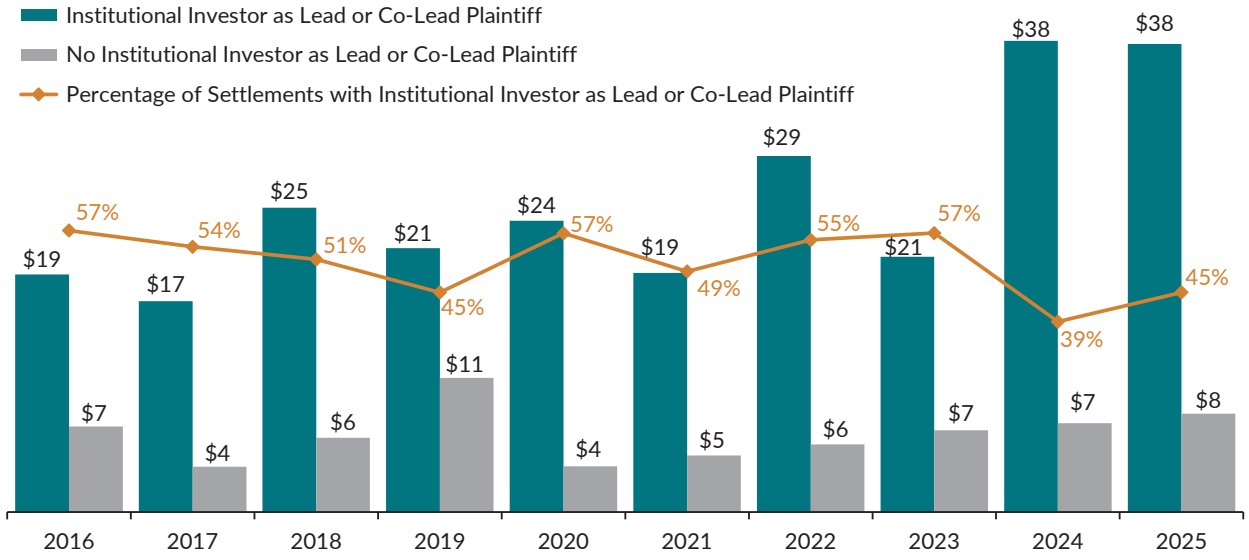
Similarly, the median settlement amount for cases with an institutional investor lead or co-lead plaintiff was 4.8 times higher than for cases without such participation.

Figure 13: Median Statistics by Institutional Investor Participation as Lead or Co-Lead Plaintiff
2025
(Dollars in millions)

	With an Institutional Investor	Without an Institutional Investor
Settlement Amount	$38	$8
Plaintiff-Style Damages	$669	$164
Settlement Amount as a Percentage of Plaintiff-Style Damages	6.6%	6.3%
Issuer Defendant Total Assets	$3,303	$594
Percentage of Settlements	45%	55%

Note: Plaintiff-style damages are estimated for cases that allege Rule 10b-5 claims (whether alone or in addition to other claims) and are adjusted for inflation based on class period end dates; 2025 dollar equivalent figures are presented.

Figure 14: Median Settlement Amount by Institutional Investor Participation as Lead or Co-Lead Plaintiff
2016–2025
(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

Time to Settlement and Case Complexity

The median duration from case filing to settlement hearing was 3.5 years, which increased nearly 10% from the median time to settle in 2024 (3.2 years) and was slightly below the peak over the last decade observed in 2023 (3.7 years). The median time to settle in 2025 was the second-longest duration in the last decade.

This finding is consistent with heightened case activity among 2025 settled cases, as measured by the number of docket entries—a proxy for the time and effort expended by the litigants and/or case complexity. In 2025, the median number of docket entries was at its highest level since 2010.

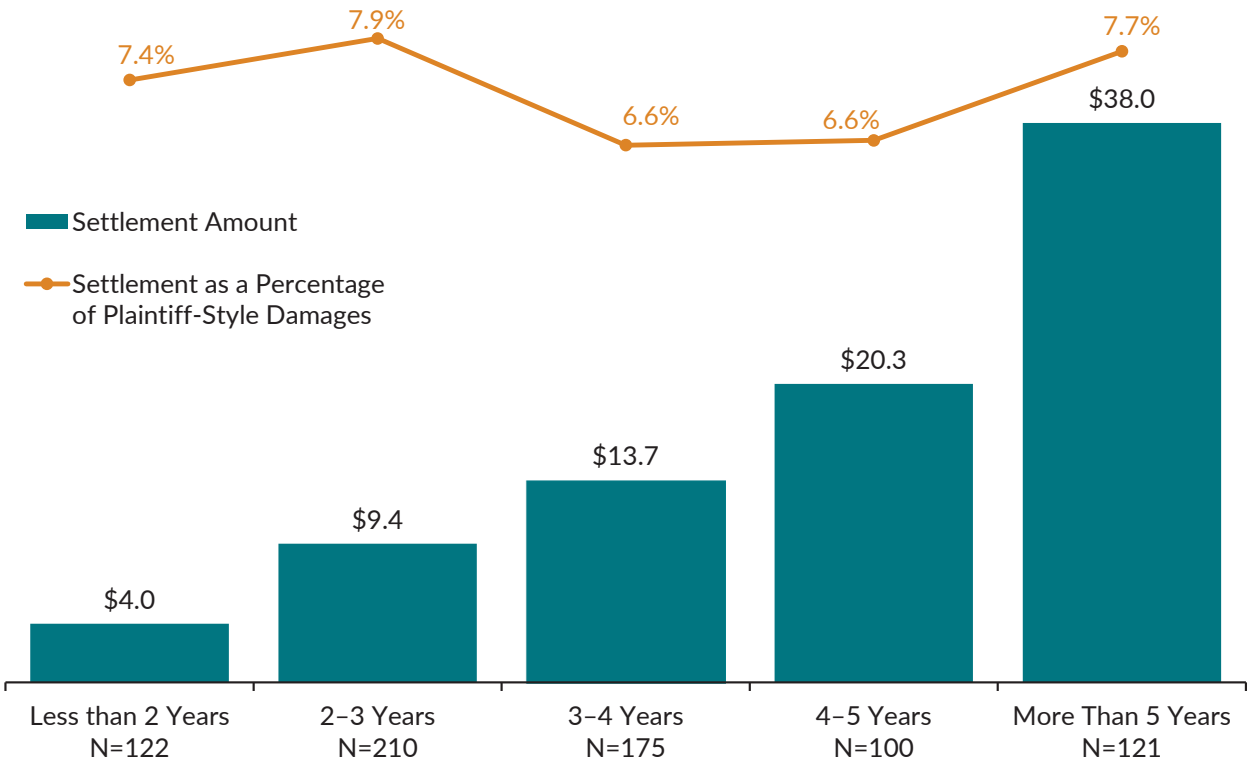
3.5 years

2025 median time to settlement

150

Median number of docket entries for 2025 cases

Figure 15: Median Settlement Amount and Settlement as a Percentage of Plaintiff-Style Damages by Duration from Filing Date to Settlement Hearing Date
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

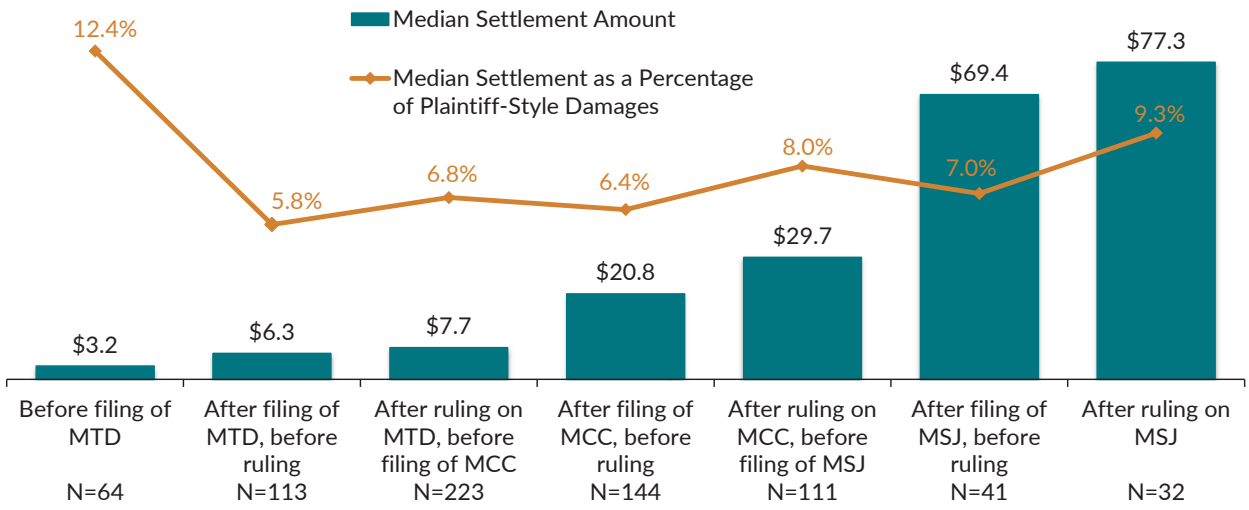
Case Stage at the Time of Settlement

In 2025, 8% of cases settled prior to the filing of a motion to dismiss (MTD), up from 2% in 2024 and equal to the 2016–2024 average.

Moreover, 54% of settlements occurred prior to the filing of a motion for class certification (MCC), up from 48% in 2024 and equal to the 2016–2024 average. Cases that settled after the filing of a MCC were twice as likely to have an institutional investor serving as lead or co-lead plaintiff than cases that settled prior to the filing of a MCC.

In the 10-year period from 2016 to 2025, median plaintiff-style damages for cases that settled after the filing of a motion for summary judgment (MSJ) was over six times the median for cases that settled before a MSJ filing.

Figure 16: Median Settlement Amount and Stage of Litigation at Time of Settlement
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. MTD refers to "motion to dismiss," MCC refers to "motion for class certification," and MSJ refers to "motion for summary judgment." This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

Figure 17: Median Statistics for Cases that Settled Prior to and After MCC Filing
2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)

	Settled Prior to MCC Filing	Settled After MCC Filing
Settlement Amount	$6	$38
Plaintiff-Style Damages	$94	$490
Settlement Amount as a Percentage of Plaintiff-Style Damages	5.3%	7.1%
Total Assets	$599	$6,069
Percentage of Settlements	58%	42%

Note: MCC refers to "motion for class certification." Plaintiff-style damages are estimated for cases that allege Rule 10b-5 claims (whether alone or in addition to other claims) and are adjusted for inflation based on class period end dates; 2025 dollar equivalent figures are presented.

Cornerstone Research's Settlement Analysis

This research examines the relationship between settlement outcomes and certain securities case characteristics. Regression analysis is employed to better understand the factors that inform case settlements given the characteristics of a particular securities class action.

DETERMINANTS OF SETTLEMENT OUTCOMES

Based on regression analysis, important determinants of settlement amounts include the following:

- Plaintiff-style damages
- The most recently reported total assets prior to the settlement hearing date for the defendant issuer
- Whether there were accounting irregularities
- Whether there were criminal charges against the issuer, officers, directors, or other defendants with allegations similar to those included in the underlying class action complaint
- Whether there was a derivative action with allegations similar to those included in the underlying class action complaint
- Whether, in addition to Rule 10b-5 claims, Section 11 claims were alleged and not dismissed prior to settlement
- Whether the issuer had been delisted from a major exchange and/or had declared bankruptcy
- Whether an institutional investor acted as lead or co-lead plaintiff
- Whether securities other than common stock/ADR/ADS were included in the alleged class

Cornerstone Research analyses show that, all else being equal, settlement amounts tended to be higher in cases involving larger plaintiff-style damages, greater issuer defendant total assets, or cases in which Section 11 claims were alleged in addition to Rule 10b-5 claims.

Settlement amounts also tended to be higher in cases that involved accounting irregularities, criminal charges, an accompanying derivative action, an institutional investor lead or co-lead plaintiff, or with securities in addition to common stock/ADR/ADS included in the alleged class.

Settlement amounts tended to be lower if the issuer had been delisted from a major exchange and/or had declared bankruptcy.

Collectively, the factors above explain approximately 75% of the variation in settlement outcomes.

Research Sample

The database compiled for this report is limited to cases that allege Rule 10b-5, Section 11, and/or Section 12(a)(2) claims brought by purchasers of a corporation's common stock.

Cases with alleged classes of only bondholders, preferred stockholders, etc.; cases that allege fraudulent deflation in price; and mergers and acquisitions cases are excluded. These criteria are imposed to ensure data availability and to utilize a relatively homogeneous set of cases in terms of the nature of the allegations.

The database includes over 2,340 securities class actions filed after passage of the Reform Act (1995) and settled from 1996 through 2025. These securities class actions correspond to approximately $155.5 billion in total settlement dollars, adjusted for inflation and expressed in 2025 dollars. These settlements are identified based on a review of case activity collected by Securities Class Action Services LLC (SCAS).[11]

The designated settlement year, for purposes of this report, corresponds to the year in which the hearing to approve the settlement was held.[12] Cases involving multiple settlements are reflected in the year of the most recent partial settlement, provided certain conditions are met.[13]

In addition to SCAS, data sources include Bloomberg, the Center for Research in Security Prices (CRSP) at the University of Chicago Booth School of Business, LSEG Workspace, court filings and dockets, SEC registrant filings, SEC litigation releases and administrative proceedings, LexisNexis, Stanford Securities Litigation Analytics (SSLA), and public press.

Endnotes

1 For purposes of the settlement research and modeling, this report utilizes a measure of potential investor losses that allows for consistency across a large volume of cases, thus enabling the identification and analysis of potential trends. This measure, "settlement model plaintiff-style damages" ("plaintiff-style damages" as referred to in this report), is estimated using a methodology that more closely aligns with approaches used by plaintiffs in the current securities class action litigation environment. For example, when estimating the number of shares eligible for damages, the plaintiff-style damages approach adjusts for short interest positions and shares estimated to be held by institutional investors throughout the entire class period.

2 Plaintiff-style damages are calculated for cases that settled in 2014 or later, and account for the U.S. Supreme Court's 2005 landmark decision in *Dura Pharmaceuticals Inc. v. Broudo*, 544 U.S. 336. Plaintiff-style damages are based on the stock-price movements associated with the alleged disclosure dates that are described in the settlement plan of allocation.

3 *Securities Class Action Filings—2025 Year in Review*, Cornerstone Research (2026).

4 *Securities Class Action Filings—2025 Year in Review*, Cornerstone Research (2026).

5 Statutory damages are estimated using an approach that more closely aligns with approaches used by plaintiffs in the current securities class action litigation environment. For example, when estimating the number of shares eligible for damages, the statutory damages approach adjusts for short interest positions. Statutory damages are calculated using data through the settlement hearing date.

6 The two subcategories of accounting issues analyzed in this report are (1) financial restatements—cases involving a restatement (or announcement of a restatement) of financial statements, and (2) accounting irregularities—cases in which the defendant has reported the occurrence of accounting irregularities (intentional misstatements or omissions) in its financial statements.

7 *Accounting Class Action Filings and Settlements—2025 Review and Analysis*, Cornerstone Research, forthcoming in spring 2026.

8 To be considered an accompanying (parallel) derivative action, the derivative action must have underlying allegations that are similar or related to the underlying allegations of the securities class action and either be active or settling at the same time as the securities class action.

9 *Parallel Derivative Action Settlements Update: August 2025*, Cornerstone Research (2025).

10 As discussed in prior reports, increasing institutional investor participation as lead plaintiff in securities litigation was a focus of the Private Securities Litigation Reform Act of 1995 (Reform Act). In the years following passage of the Reform Act, institutional investor involvement as lead plaintiff did increase, particularly in cases with higher plaintiff-style damages.

11 Available on a subscription basis. For further details, see https://www.issgovernance.com/securities-class-action-services/.

12 Movements of partial settlements between years can cause settlement amounts reported for prior years to differ from those presented in earlier reports.

13 This categorization is based on the timing of the settlement hearing date. If a new partial settlement equals or exceeds 50% of the then-current settlement fund amount, the entirety of the settlement amount is recategorized to reflect the settlement hearing date of the most recent partial settlement. If a subsequent partial settlement is less than 50% of the then-current total, the partial settlement is added to the total settlement amount and the settlement hearing date is left unchanged.

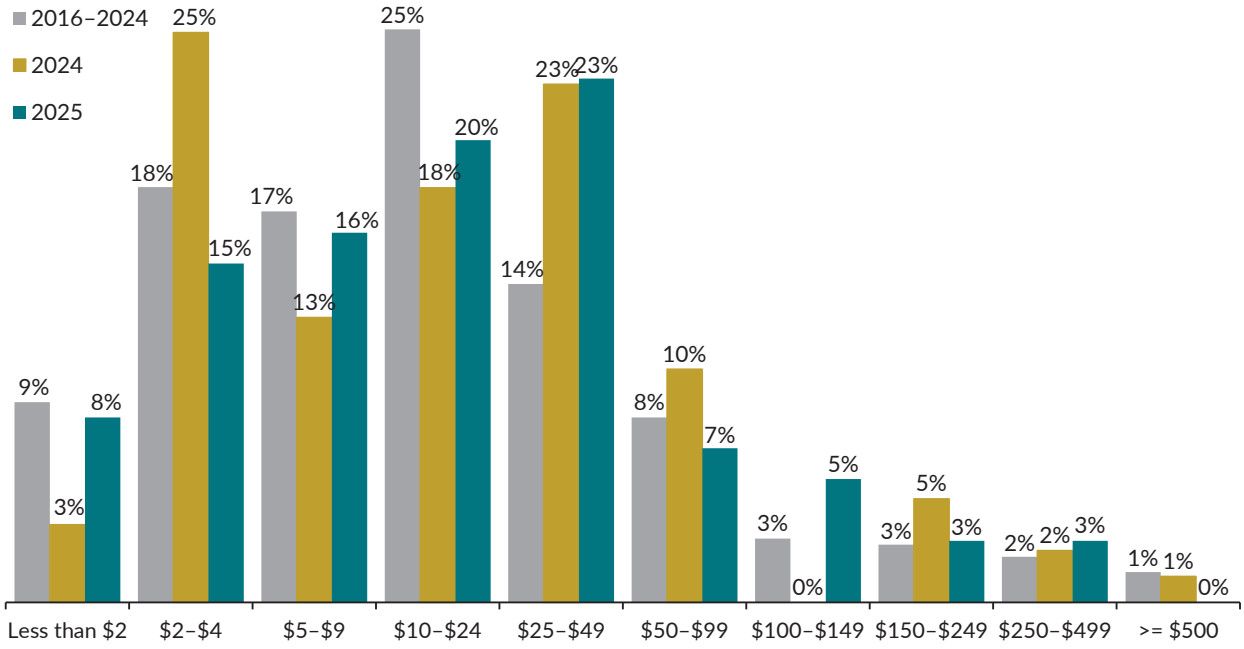
Appendices

Appendix 1: Settlements by Industry Sectors
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)

Industry	Number of Settlements	Median Settlement	Median Plaintiff-Style Damages	Median Settlement as a Percentage of Plaintiff-Style Damages
Consumer Services/ Information Technology	142	$10.1	$242.4	6.4%
Consumer Discretionary	92	$14.1	$278.0	6.9%
Consumer Staples	28	$14.9	$361.0	6.0%
Energy/Materials	70	$17.3	$281.1	8.4%
Financials/Real Estate	90	$19.3	$252.5	9.9%
Health Care	209	$12.1	$226.7	6.7%
Industrials	87	$8.7	$180.6	6.6%
Utilities	10	$15.4	$147.4	9.4%

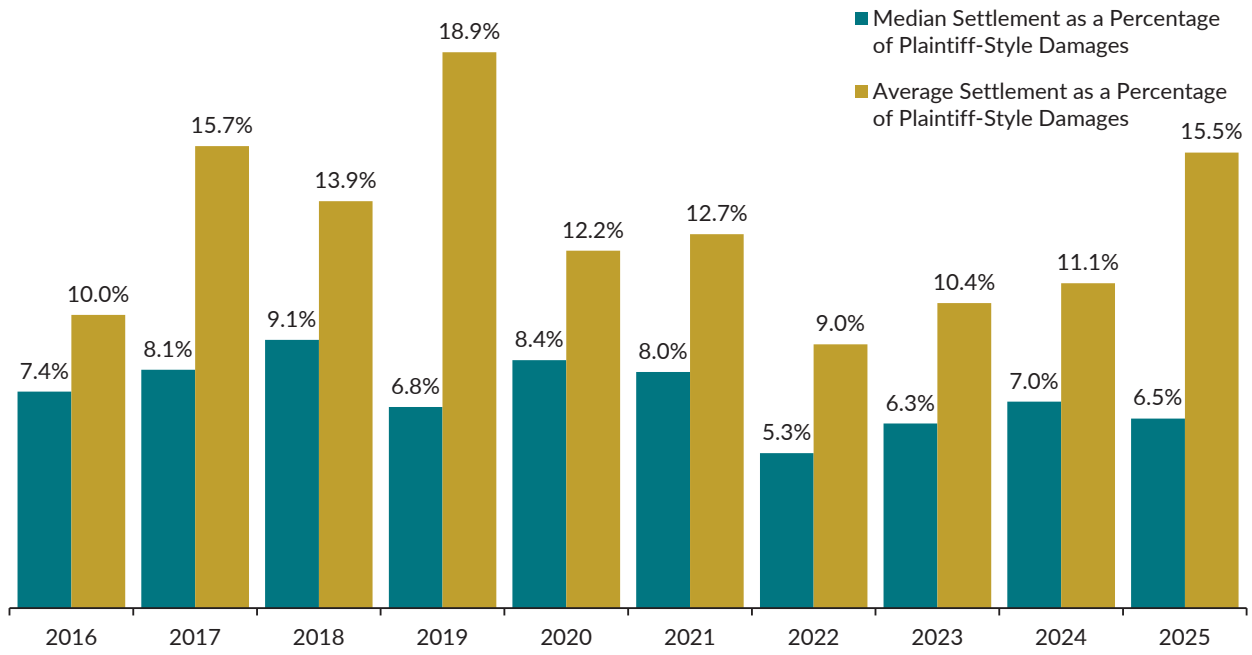
Note: Settlement dollars and plaintiff-style damages are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims). Industry sectors are based on the Global Industry Classification Standard (GICS).

Appendix 2: Distribution of Settlements Amounts
2016–2025
(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. Percentages may not sum to 100% due to rounding.

Appendix 3: Median and Average Settlements as a Percentage of Plaintiff-Style Damages
2016–2025, Settlements with Rule 10b-5 Claims



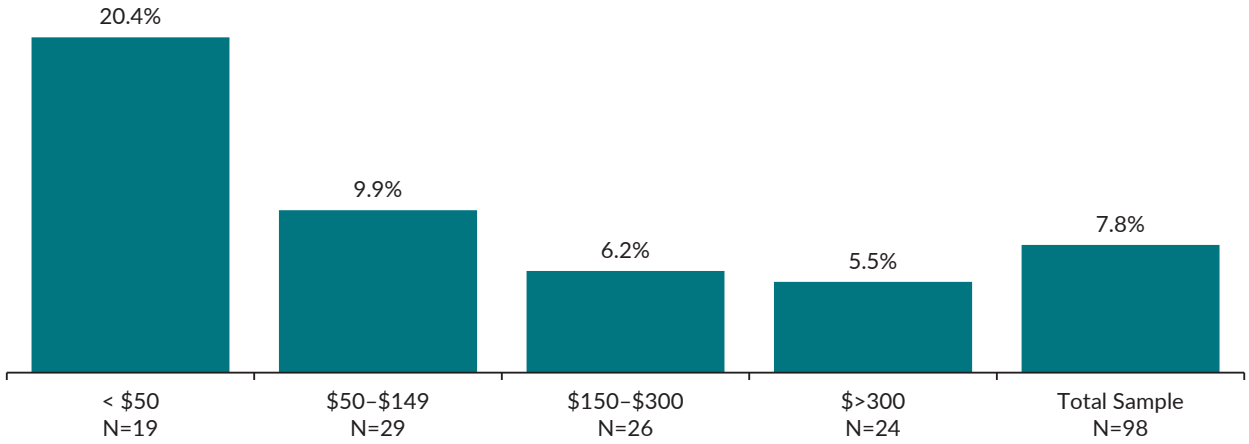
Note: Plaintiff-style damages are calculated for cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

Appendix 4: Settlement Statistics by Federal Circuit Court
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)

Circuit	Number of Settlements	Median Settlement	Median Settlement as a Percentage of Plaintiff-Style Damages
First	21	$23.2	4.1%
Second	203	$9.8	7.7%
Third	90	$9.2	7.0%
Fourth	24	$30.3	4.6%
Fifth	40	$13.8	5.6%
Sixth	32	$18.1	9.7%
Seventh	38	$20.1	6.7%
Eighth	12	$51.1	5.6%
Ninth	205	$11.0	7.0%
Tenth	23	$20.0	10.1%
Eleventh	36	$12.7	7.8%
DC	4	$29.5	4.8%

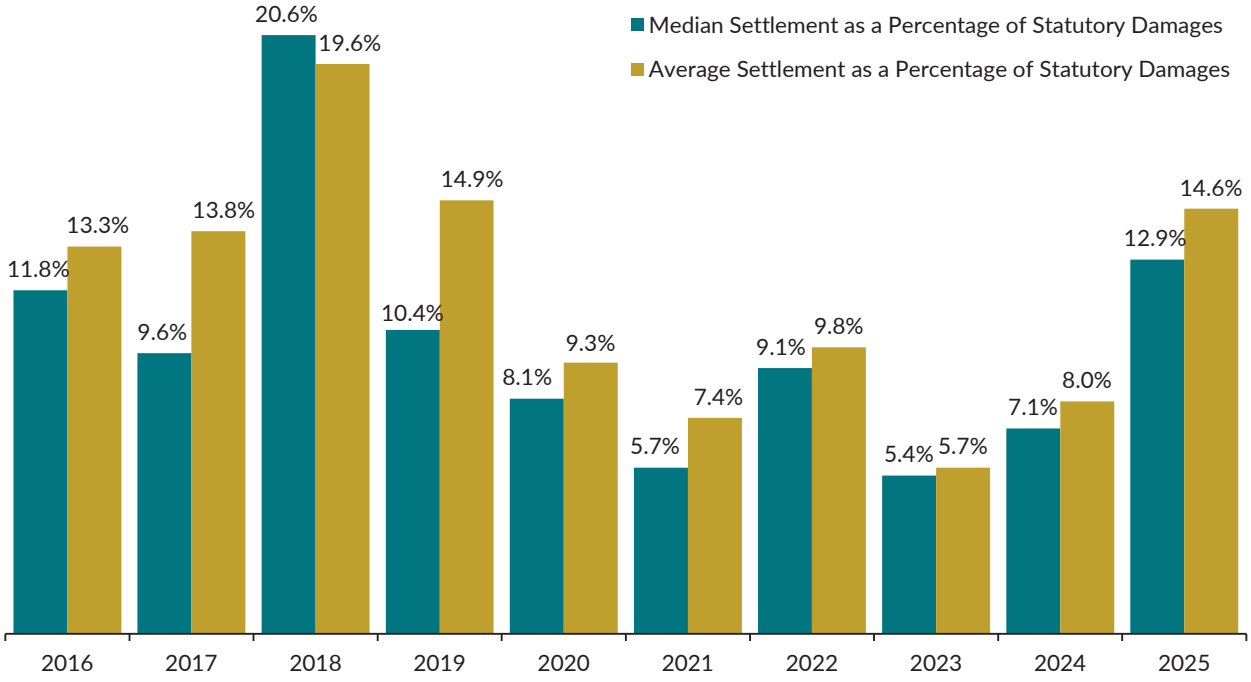
Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

Appendix 5: Median Settlement as a Percentage of Statutory Damages by Damages Ranges
2016–2025, Settlements with Only '33 Act Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Statutory damages are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis excludes cases that allege Rule 10b-5 claims.

Appendix 6: Median and Average Settlement as a Percentage of Statutory Damages
2016–2025, Settlements with Only '33 Act Claims



Note: This analysis excludes cases that allege Rule 10b-5 claims.

Appendix 7: Settlements by Nature of Claim

2016–2025

	Number of Settlements	Median Settlement	Median Statutory Damages	Median Settlement as a Percentage of Statutory Damages
'33 Act Only	98	$10.8	$155.9	7.8%

	Number of Settlements	Median Settlement	Median Plaintiff-Style Damages	Median Settlement as a Percentage of Plaintiff-Style Damages
Both Rule 10b-5 and '33 Act Claims	123	$16.7	$244.7	10.8%
Rule 10b-5 Only	605	$12.3	$236.3	6.8%

Note: Settlement dollars and damages are adjusted for inflation; 2025 dollar equivalent figures are presented.

About the Authors

Laarni T. Bulan
Vice President, Cornerstone Research

Laarni Bulan has over 14 years of experience consulting on complex litigation involving economic and financial issues. Dr. Bulan specializes in securities, mergers and acquisitions and other corporate transactions, firm valuation, risk management, executive compensation, and corporate governance matters.

Dr. Bulan serves as co-head of the firm's corporate governance practice. She is a member of the Advisory Board of the Institute for Law and Economics, University of Pennsylvania Carey Law School.

Dr. Bulan has published numerous articles in peer-reviewed journals, including *Financial Management*, the *Journal of Banking and Finance*, the *Journal of Economics and Business*, and the *Journal of Urban Economics*. Her research covers dividend policy, capital structure, executive compensation, corporate governance, and real options. Prior to joining Cornerstone Research, Dr. Bulan held a joint appointment at Brandeis University, where she served as an assistant professor of finance in the International Business School and also in the economics department.

Eric Tam
Principal, Cornerstone Research

Eric Tam specializes in securities litigation. Mr. Tam has more than 20 years of experience consulting to clients and addressing financial economics issues and class actions in federal and state courts, including the Delaware Court of Chancery. His experience spans all stages of the litigation process, including exposure analysis, class certification, expert support, summary judgment filings, mediation and settlement analysis, trial preparation, and regulatory proceedings.

Mr. Tam has extensive expertise with securities litigation involving alleged misrepresentations under Section 10(b) of the Exchange Act and Sections 11 and 12 of the Securities Act. He also addresses allegations of market manipulation under Sections 9 and 10(b) of the Exchange Act and claims under Section 14(a) of the Exchange Act.

Mr. Tam has analyzed class certification issues (market efficiency, price impact, and evaluation of damages methodologies in the context of *Comcast* standards), as well as loss causation, damages, and materiality in numerous securities class actions.

The views expressed herein are solely those of the authors and do not necessarily represent the views of Cornerstone Research.

CORNERSTONE RESEARCH
Economic and Financial Consulting and Expert Testimony

The authors request that you reference Cornerstone Research in any reprint of the information or figures included in this report.

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Cornerstone Research

Cornerstone Research provides economic and financial consulting and expert testimony in all phases of complex disputes and regulatory investigations. The firm works with an extensive network of prominent academics and industry practitioners to identify the best-qualified expert for each assignment. With a reputation for high quality and effectiveness, Cornerstone Research has consistently delivered rigorous, state-of-the-art analysis since 1989. The firm has more than 1,000 professionals in nine offices across the United States, UK, and EU.

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Exhibit 6

LABATON KELLER SUCHAROW LLP
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Counsel for Lead Plaintiffs and Proposed Class Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND, AND SYLEBRA CAPITAL MENLO MASTER FUND, Individually and on Behalf of All Others Similarly Situated, Plaintiffs, v. EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON, Defendants.	Case No. 2:22-cv-02249-FWS-RAO **DECLARATION OF MICHAEL H. ROGERS ON BEHALF OF LABATON KELLER SUCHAROW LLP IN SUPPORT OF APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES** Hearing Date: December 17, 2026 Time: 10:00 a.m. Courtroom: 10D Judge: Hon. Fred W. Slaughter

I, Michael H. Rogers, declare as follows, pursuant to 28 U.S.C. §1746:

1. I am a member of the law firm of Labaton Keller Sucharow LLP ("Labaton"). I submit this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-

entitled action (the "Action")[1] from the inception of my firm's involvement through November 10, 2026.

2. My firm, which served as Court-appointed Lead Counsel in the Action, oversaw and was involved throughout the course of the litigation, which is described in the accompanying Declaration of Michael H. Rogers in Support of (I) Motion for Final Approval of Class Action Settlement and Plan of Allocation and (II) Motion for an Award of Attorneys' Fees and Expenses, filed herewith.

3. The information in this declaration regarding my firm's time and expenses is taken from time and expense records prepared and maintained by the firm in the ordinary course of business. These records (and backup documentation where necessary) were reviewed by me or others at my firm, under my direction, to confirm both the accuracy of the entries as well as the necessity for and reasonableness of the time and expenses committed to the litigation. As a result of this review and the adjustments made, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the claims at issue. In addition, I believe that the expenses are all of a type that would normally be paid by a fee-paying client in the private non-contingent legal marketplace.

4. After this review, the number of hours spent on the litigation by my firm is 16,406.1. The lodestar amount for attorney/professional support staff time based on the firm's current hourly rates is $9,984,902.50 and $9,368,426.00 at historical rates. A summary of the lodestar at current rates is provided in Exhibit A and, pursuant to the Court's Civil Standing Order, a breakdown of the work associated with the lodestar, by task code, at historical rates is provided in Exhibits B and C. The schedules were

[1] All capitalized terms used in this declaration that are not defined have the same meanings as in the Stipulation and Agreement of Settlement, dated August 10, 2026 ("Stipulation"). *See* ECF No. 188-3.

prepared from daily time records regularly prepared and maintained by my firm, which are available at the request of the Court. Time expended in preparing this application for fees and expenses has not been included. The hourly rates shown in Exhibits A-C are consistent with the hourly rates submitted by the firm in other contingent complex litigations. The firm's rates are set based on periodic analysis of rates used by firms performing comparable work both on the plaintiff and defense sides. For personnel who are no longer employed by the firm, the "current rate" used for the lodestar calculation in Exhibit A is the rate for that person in his or her final year of employment with the firm.

5. As detailed in Exhibit D, my firm has incurred a total of $400,960.73 in expenses in connection with the prosecution of the claims. The expenses are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred.

6. The following is additional information regarding certain of these expenses:

(a) Filing, Witness & Service Fees: $3,321.43. These expenses have been paid to attorney service firms or courts in connection with attorney admissions, Lead Plaintiffs' appeal to the Ninth Circuit, and court filings.

(b) Experts/Consultants: $71,461.00. As explained below, and in Exhibit E, Labaton established and was responsible for maintaining a Litigation Expense Fund on behalf of itself and Robbins Geller Rudman & Dowd LLP in order to monitor the major expenses incurred in the Action and to facilitate their payment. However, Labaton also paid the expenses of some of Lead Plaintiffs' experts and consultants. The expert/consultant fees and costs incurred by Labaton were as follows:

(i) Damages/Market Efficiency/Loss Causation - $63,003.50. Labaton consulted with economic experts, including Chad Coffman, CFA, about loss causation, market efficiency, and damages issues in connection with, among other

things, the investigation of the claims and defenses, drafting complaints, and the motion for class certification. Additional costs were paid by the Litigation Fund.

(ii) Post-Acquisition Accounting - $8,457.50. Labaton consulted with a post-acquisition accounting expert to analyze Everbridge's purchase accounting methodologies, including its accounting of the revenue acquired by xMatters. Additional costs were paid by the Litigation Fund.

(c) Counsel for Confidential Witnesses: $6,345.00. In connection with the investigation of the claims, Lead Counsel interviewed numerous former employees of Everbridge, 16 of whom provided information used in the amended complaints. Lead Counsel obtained counsel for several of the witnesses cited in the complaints in connection with Defendants' requests for information from certain of those witnesses. Additional costs were paid by the Litigation Fund.

(d) Court & Deposition Transcripts: $220.00. These are the costs of hearing transcripts. Additional costs were paid by the Litigation Fund.

(e) Litigation Support: $11,728.13. These are the fees and expenses of Lead Plaintiffs' e-discovery vendors in connection with processing and hosting documents produced by Lead Plaintiffs. These expenses include the estimated costs of eight months of "cold storage" of the data, at $106 per month, pending the Settlement becoming effective. If more than this estimate is incurred, this estimate will be the cap. If less than this estimate is incurred, the unused balance will be returned to the Settlement Fund. Additional costs were paid by the Litigation Fund.

(f) Work-Related Transportation, Hotels & Meals: $33,153.64. In connection with the prosecution of the case, the firm has paid for work-related transportation expenses, meals, and travel expenses related to, among other things, attending court hearings, arguing before the U.S. Court of Appeals, and the depositions. (Any first-class airfare has been reduced to be comparable to economy rates.) This expense includes $6,600 in estimated costs for attending the final Settlement Hearing in December. If less than this estimate is incurred, the unused portion will be returned

to the Settlement Fund. If more than this estimate is incurred, the estimate will be the cap.

(g) Online Legal & Factual Research: $34,951.29. These expenses relate to the usage of electronic databases, such as PACER, Westlaw, and LexisNexis Risk Solutions. These databases were used to obtain access to financial data, factual information, and legal research. Usage was tracked as related to this matter through the use of its unique client-matter number.

(h) Duplicating: $8,887.32. In connection with this matter, the firm made 9,707 in-house black & white photocopies/printouts at $0.20 per page, and 17,128 in-house color photocopies/printouts at $0.40 per page, for a total of $8,792.60. In-house photocopies and printouts are tracked using the case's client-matter number and that is how the 26,835 pages were identified as related to this matter. My firm also paid $94.72 to outside copy vendors.

(i) Contribution to Litigation Expense Fund: $138,025.03. My firm contributed $138,025.03 to the Litigation Fund and requests reimbursement for this contribution. The expenses incurred by the Litigation Fund are discussed below and in Exhibit E.

7. The expenses incurred by the Litigation Fund are reported in Exhibit E, attached hereto. The Litigation Fund received contributions from Labaton and Robbins Geller totaling $168,025.03. These contributions are reported in Exhibit D to each firm's individual fee and expense declaration so they can be repaid. The Litigation Fund incurred a total of $257,015.77 in expenses in connection with the prosecution of the Action, accordingly, there is a shortfall of $88,990.74, which has been added to my firm's expense request so that, upon Court approval, these unpaid expenses can be paid.

8. The following is additional information regarding certain of the Litigation Fund expenses:

(a) Experts/Consultants: $139,509.75. These are the fees and expenses of Lead Plaintiffs' experts, which are in addition to the expert expenses incurred by Labaton individually:

(i) Damages/Loss Causation/Plan of Allocation: $135,529.75. These are the fees and costs of Lead Plaintiffs' primary damages expert, Chad Coffman, who provided expert analysis related to loss causation, market efficiency, and damages in the case. Mr. Coffman and his team also worked with Lead Counsel to prepare the proposed Plan of Allocation for the proceeds of the Settlement.

(ii) Post-Acquisition Accounting: $3,980.00. These are additional fees and costs related to the expert described above who provided assistance with the analysis of accounting issues.

(b) Mediation Fees: $51,137.50. These are Lead Plaintiffs' share of the fees of mediator David Murphy, Esq. of Phillips ADR Enterprises. Mr. Murphy oversaw the mediation session and negotiations between the Parties, which ultimately led to the acceptance of his recommendation to settle and the proposed Settlement before the Court.

(c) Deposition Reporting: $4,170.54. These are the fees and costs of the depositions of the Sylebra Funds and Chad Coffman in connection with Lead Plaintiffs' motion for certification of the class.

(d) Litigation Support: $60,146.38. These are the fees and expenses of Lead Plaintiffs' e-discovery vendor in connection with processing and hosting more than 207,100 documents (approximately 1,083,000 pages) produced by Defendants and third parties. This vendor was key for the efficient maintenance and analysis of a substantial amount of electronic information. These expenses include the estimated costs of eight months of "cold storage" of the data, at $1,800 per month, pending the Settlement becoming effective. If more than this estimate is incurred, this estimate will be the cap. If less than this estimate is incurred, the unused balance will be returned to the Settlement Fund.

9. The expenses incurred by Labaton and the Litigation Expense Fund in the Action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. I believe these expenses were reasonable and expended for the benefit of the Settlement Class in the Action.

10. With respect to the standing of my firm, attached hereto as Exhibit F is a brief biography of my firm as well as biographies of the firm's partners and of counsel attorneys.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of November, 2026.

MICHAEL H. ROGERS

Exhibit A

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc. et al.

EXHIBIT A

LODESTAR REPORT

FIRM: LABATON KELLER SUCHAROW LLP
REPORTING PERIOD: INCEPTION THROUGH NOVEMBER 10, 2026

PROFESSIONAL	POSITION	CURRENT RATE	HOURS	LODESTAR
Gardner, J.	(P)	$1,450	9.7	$14,065.00
Belfi, E.	(P)	$1,400	35.6	$49,840.00
Keller, C.	(P)	$1,375	43.5	$59,812.50
Canty, M.	(P)	$1,300	86.8	$112,840.00
Johnson, J.	(P)	$1,275	116.5	$148,537.50
Zeiss, N.	(P)	$1,250	56.1	$70,125.00
McConville, F.	(P)	$1,250	31.5	$39,375.00
Schochet, I.	(P)	$1,175	78.2	$91,885.00
Rogers, M.	(P)	$1,150	1,441.8	$1,658,070.00
Rosenberg, E.	(OC)	$1,025	102.7	$105,267.50
Cividini, D.	(OC)	$950	224.7	$213,465.00
Kamhi, R.	(OC)	$850	136.3	$115,855.00
Schervish II, W.	(OC)	$850	15.1	$12,835.00
Fee, J.	(OC)	$825	72.6	$59,895.00
Manningham, N.	(OC)	$800	1,546.0	$1,236,800.00
Barrett, T.	(A)	$700	386.3	$270,410.00
Stiene, C.	(A)	$600	42.0	$25,200.00
Leggio, P.	(A)	$575	200.1	$115,057.50
Rowley, R.	(A)	$500	100.0	$50,000.00
Panza, R.	(A)	$500	59.5	$29,750.00
Yu, N.	(A)	$425	1,013.8	$430,865.00
Eynon, T.	(A)	$400	650.6	$260,240.00
Bryan, A.	(A)	$350	20.4	$7,140.00

PROFESSIONAL	POSITION	CURRENT RATE	HOURS	LODESTAR
Druhm, K.	(SA)	$550	702.2	$386,210.00
Brissett, V.	(SA)	$550	53.8	$29,590.00
Drapkin, A.	(SA)	$530	305.4	$161,862.00
Aiyappasamy, S.	(SA)	$530	246.2	$130,486.00
Coyle, W.	(SA)	$525	612.8	$321,720.00
Farinella, M.	(SA)	$525	407.8	$214,095.00
Martey, L.	(SA)	$525	382.0	$200,550.00
Atilade, A.	(SA)	$525	311.6	$163,590.00
Hayashi, M.	(SA)	$525	231.0	$121,275.00
Rubinstein, S.	(SA)	$525	176.0	$92,400.00
Rosenberg, J.	(SA)	$505	312.0	$157,560.00
Wostl, K.	(SA)	$505	281.8	$142,309.00
Brockman, J.	(SA)	$505	130.9	$66,104.50
Kussin, T.	(SA)	$505	66.0	$33,330.00
Philbert, J.	(SA)	$500	265.9	$132,950.00
Clarkin, C.	(SA)	$475	306.1	$145,397.50
Hamlani, S.	(SA)	$450	668.5	$300,825.00
Bagwell, A.	(SA)	$440	425.2	$187,088.00
Weber, E.	(SA)	$440	313.0	$137,720.00
Carty, K.	(SA)	$440	241.5	$106,260.00
Wortman, C.	(SA)	$425	676.0	$287,300.00
Reid, B.	(SA)	$425	553.0	$235,025.00
Boadi, D.	(SA)	$425	274.0	$116,450.00
Abidi, S.	(SA)	$425	182.2	$77,435.00
Edwards, J.	(SA)	$425	13.6	$5,780.00
Divers, M.	(SA)	$405	398.1	$161,230.50
Sanchez, A.	(SA)	$405	211.4	$85,617.00
Greenbaum, A.	(I)	$700	120.9	$84,630.00
Rutherford, C.	(I)	$575	109.3	$62,847.50
Megibow, S.	(I)	$550	388.2	$213,510.00
Boria, C.	(PL)	$455	29.8	$13,559.00
Malonzo, F.	(PL)	$445	260.5	$115,922.50
Jones, A.	(PL)	$440	141.2	$62,128.00
Rogers, D.	(PL)	$440	22.2	$9,768.00
Ramphul, R.	(PL)	$390	52.2	$20,358.00
Sosnoski, D.	(PL)	$390	33.5	$13,065.00
Manzolillo, S.	(PL)	$390	12.5	$4,875.00

PROFESSIONAL	POSITION	CURRENT RATE	HOURS	LODESTAR
Pina, E.	(PL)	$375	18.0	$6,750.00
TOTALS			**16,406.1**	**$9,984,902.50**

Partner	(P)	Staff Attorney	(SA)
Of Counsel	(OC)	Investigator	(I)
Associate	(A)	Paralegal	(PL)

Exhibit B

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc. et al.

EXHIBIT B

Task 1: Factual Investigation			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Jonathan Gardner (Partner) (2022)	$1,250	3.60	$4,500.00
Jonathan Gardner (Partner) (2023-2024)	$1,275	1.40	$1,785.00
James Johnson (Partner) (2022)	$1,250	35.90	$44,875.00
Michael Rogers (Partner) (2022)	$975	14.60	$14,235.00
Michael Rogers (Partner) (2023)	$1,000	24.00	$24,000.00
Michael Rogers (Partner) (2025)	$1,050	2.00	$2,100.00
Ira Schochet (Partner) (2022)	$1,150	4.30	$4,945.00
James Fee (Of Counsel) (2023)	$600	8.00	$4,800.00
Nicholas Manningham (Of Counsel) (2022)	$475	88.30	$41,942.50
William Schervish II (Of Counsel) (2022)	$625	3.30	$2,062.50
Philip Leggio (Associate) (2022)	$525	23.30	$12,232.50
Newton Yu (Associate) (2022)	$275	44.70	$12,292.50
Amy Greenbaum (Investigator) (2022)	$575	43.70	$25,127.50

Amy Greenbaum (Investigator) (2023-2024)	$625	56.80	$35,500.00
Amy Greenbaum (Investigator) (2025)	$650	0.70	$455.00
Steven Megibow (Investigator) (2022)	$425	195.90	$83,257.50
Steven Megibow (Investigator) (2023)	$475	186.80	$88,730.00
Steven Megibow (Investigator) (2024)	$475	0.30	$142.50
Steven Megibow (Investigator) (2025)	$500	4.40	$2,200.00
Steven Megibow (Investigator) (2026)	$550	0.80	$440.00
Connor Rutherford (Investigator) (2022)	$400	66.10	$26,440.00
Connor Rutherford (Investigator) (2023)	$450	16.90	$7,605.00
Connor Rutherford (Investigator) (2025)	$525	25.70	$13,492.50
Connor Rutherford (Investigator) (2026)	$575	0.60	$345.00
Allen Jones (Paralegal) (2025)	$400	2.40	$960.00
Francisco Malonzo (Paralegal) (2022)	$380	0.80	$304.00
Denise R. Rogers (Paralegal) (2022)	$375	17.00	$6,375.00
Denice Sosnoski (Paralegal) (2022)	$390	5.70	$2,223.00
Totals for Task 1:		**878.00**	**$463,367.00**

Task 2: Complaints			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Michael Canty (Partner) (2023)	$1,025	2.90	$2,972.50
Michael Canty (Partner) (2025)	$1,100	2.00	$2,200.00
James Johnson (Partner) (2022)	$1,250	47.10	$58,875.00
Francis McConville (Partner) (2022)	$875	14.40	$12,600.00
Michael Rogers (Partner) (2022)	$975	65.80	$64,155.00
Michael Rogers (Partner) (2023)	$1,000	39.40	$39,400.00
Michael Rogers (Partner) (2025)	$1,050	36.40	$38,220.00
Michael Rogers (Partner) (2026)	$1,150	7.50	$8,625.00
Ira Schochet (Partner) (2022)	$1,150	72.10	$82,915.00
James Fee (Of Counsel) (2022)	$575	7.40	$4,255.00
James Fee (Of Counsel) (2023)	$600	36.90	$22,140.00
Nicholas Manningham (Of Counsel) (2022)	$475	183.40	$87,115.00
Nicholas Manningham (Of Counsel) (2023)	$575	2.00	$1,150.00
Nicholas Manningham (Of Counsel) (2025)	$650	24.00	$15,600.00
Nicholas Manningham (Of Counsel) (2026)	$800	5.10	$4,080.00
William Schervish II (Of Counsel) (2022)	$625	11.80	$7,375.00

Tayler Eynon (Associate) (2025)	$300	51.50	$15,450.00
Tayler Eynon (Associate) (2026)	$350	1.00	$350.00
Philip Leggio (Associate) (2023)	$550	67.50	$37,125.00
Raquel Panza (Associate) (2023)	$450	10.10	$4,545.00
Robert Rowley (Associate) (2022)	$450	2.00	$900.00
Charles Stiene (Associate) (2023)	$475	1.10	$522.50
Newton Yu (Associate) (2024)	$300	1.80	$540.00
Newton Yu (Associate) (2025)	$350	8.40	$2,940.00
Amy Greenbaum (Investigator) (2024)	$625	1.50	$937.50
Allen Jones (Paralegal) (2023)	$390	8.10	$3,159.00
Allen Jones (Paralegal) (2025)	$400	6.90	$2,760.00
Allen Jones (Paralegal) (2026)	$440	2.20	$968.00
Francisco Malonzo (Paralegal) (2023)	$380	8.70	$3,306.00
Francisco Malonzo (Paralegal) (2025)	$405	0.90	$364.50
Francisco Malonzo (Paralegal) (2026)	$445	0.80	$356.00
Robendranauth Ramphul (Paralegal) (2023)	$390	12.70	$4,953.00
Denise R. Rogers (Paralegal) (2022)	$375	5.20	$1,950.00

Denice Sosnoski (Paralegal) (2022)	$390	18.40	$7,176.00
Totals for Task 2:		**767.00**	**$539,980.00**

Task 3: Fact Discovery			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Michael Canty (Partner) (2025)	$1,100	0.50	$550.00
Michael Canty (Partner) (2026)	$1,300	13.10	$17,030.00
Jonathan Gardner (Partner) (2025)	$1,375	0.50	$687.50
Michael Rogers (Partner) (2025)	$1,050	62.00	$65,100.00
Michael Rogers (Partner) (2026)	$1,150	136.50	$156,975.00
Derick Cividini (Of Counsel) (2025)	$850	35.50	$30,175.00
Derick Cividini (Of Counsel) (2026)	$950	184.10	$174,895.00
James Fee (Of Counsel) (2023)	$600	11.50	$6,900.00
Nicholas Manningham (Of Counsel) (2023)	$575	5.40	$3,105.00
Nicholas Manningham (Of Counsel) (2024)	$600	0.30	$180.00
Nicholas Manningham (Of Counsel) (2025)	$650	61.20	$39,780.00
Nicholas Manningham (Of Counsel) (2026)	$800	223.40	$178,720.00
Timothy Barrett (Associate) (2025)	$650	17.20	$11,180.00
Timothy Barrett (Associate) (2026)	$700	354.90	$248,430.00

Tayler Eynon (Associate) (2025)	$300	85.70	$25,710.00
Tayler Eynon (Associate) (2026)	$350	120.10	$42,035.00
Tayler Eynon (Associate) (2026)	$400	77.00	$30,800.00
Philip Leggio (Associate) (2022)	$525	0.70	$367.50
Philip Leggio (Associate) (2023)	$550	2.90	$1,595.00
Charles Stiene (Associate) (2023)	$475	0.40	$190.00
Newton Yu (Associate) (2025)	$350	62.00	$21,700.00
Newton Yu (Associate) (2026)	$425	328.20	$139,485.00
Kris W. Druhm (Staff Attorney) (2026)	$550	3.50	$1,925.00
Amy Greenbaum (Investigator) (2025)	$650	9.90	$6,435.00
Amy Greenbaum (Investigator) (2026)	$700	2.50	$1,750.00
Allen Jones (Paralegal) (2025)	$400	5.30	$2,120.00
Allen Jones (Paralegal) (2026)	$440	10.10	$4,444.00
Francisco Malonzo (Paralegal) (2025)	$405	9.80	$3,969.00
Francisco Malonzo (Paralegal) (2026)	$445	55.50	$24,697.50
Totals for Task 3:		**1,879.70**	**$1,240,930.50**

Task 4: Document Review			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Michael Rogers (Partner) (2026)	$1,150	5.40	$6,210.00
Nicholas Manningham (Of Counsel) (2026)	$800	11.70	$9,360.00
Tayler Eynon (Associate) (2026)	$350	3.00	$1,050.00
Tayler Eynon (Associate) (2026)	$400	0.20	$80.00
Sadaf Abidi (Staff Attorney) (2026)	$425	182.20	$77,435.00
Sheela Aiyappasamy (Staff Attorney) (2026)	$530	244.70	$129,691.00
Adedapo Atilade (Staff Attorney) (2026)	$525	311.60	$163,590.00
Andrew Bagwell (Staff Attorney) (2026)	$440	425.20	$187,088.00
Deborah Boadi (Staff Attorney) (2026)	$425	274.00	$116,450.00
Vivianne Brissett (Staff Attorney) (2026)	$550	44.50	$24,475.00
Jody Brockman (Staff Attorney) (2026)	$505	130.90	$66,104.50
Kevin Carty (Staff Attorney) (2026)	$440	241.50	$106,260.00
Christopher Clarkin (Staff Attorney) (2026)	$475	306.10	$145,397.50
William Coyle (Staff Attorney) (2026)	$525	612.80	$321,720.00
Michael Divers (Staff Attorney) (2026)	$405	398.10	$161,230.50
Adam Drapkin (Staff Attorney) (2026)	$530	305.40	$161,862.00

Kris Druhm (Staff Attorney) (2026)	$550	692.70	$380,985.00
Jocia Edwards (Staff Attorney) (2026)	$425	13.60	$5,780.00
Mark Farinella (Staff Attorney) (2026)	$525	407.80	$214,095.00
Sahar Hamlani (Staff Attorney) (2026)	$450	668.50	$300,825.00
Migiwa Hayashi (Staff Attorney) (2026)	$525	231.00	$121,275.00
Todd Kussin (Staff Attorney) (2026)	$505	38.10	$19,240.50
Leslie Martey (Staff Attorney) (2026)	$525	382.00	$200,550.00
Jenetha Philbert (Staff Attorney) (2026)	$500	265.90	$132,950.00
Bryan Reid (Staff Attorney) (2026)	$425	553.00	$235,025.00
Justin Rosenberg (Staff Attorney) (2026)	$505	312.00	$157,560.00
Susan Rubinstein (Staff Attorney) (2026)	$525	176.00	$92,400.00
Anglina Sanchez (Staff Attorney) (2026)	$405	211.40	$85,617.00
Eugene Weber (Staff Attorney) (2026)	$440	313.00	$137,720.00
Cecile Wortman (Staff Attorney) (2026)	$425	676.00	$287,300.00
Kendall Wostl (Staff Attorney) (2026)	$505	281.80	$142,309.00
Totals for Task 4:		**8,720.10**	**$4,191,635.00**

Task 5: Motions & Legal Research			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
James Johnson (Partner) (2022)	$1,250	31.70	$39,625.00
Francis McConville (Partner) (2022)	$875	17.10	$14,962.50
Michael Rogers (Partner) (2022)	$975	55.90	$54,502.50
Michael Rogers (Partner) (2023)	$1,000	52.80	$52,800.00
Michael Rogers (Partner) (2025)	$1,050	37.20	$39,060.00
Michael Rogers (Partner) (2026)	$1,150	8.60	$9,890.00
James Fee (Of Counsel) (2023)	$600	0.60	$360.00
Ross Kamhi (Of Counsel) (2024)	$750	48.10	$36,075.00
Nicholas Manningham (Of Counsel) (2022)	$475	160.90	$76,427.50
Nicholas Manningham (Of Counsel) (2023)	$575	117.00	$67,275.00
Nicholas Manningham (Of Counsel) (2024)	$600	5.00	$3,000.00
Nicholas Manningham (Of Counsel) (2025)	$650	90.70	$58,955.00
Nicholas Manningham (Of Counsel) (2026)	$800	4.00	$3,200.00
Ashton Bryan (Associate) (2023)	$275	3.00	$825.00
Ashton Bryan (Associate) (2025)	$325	4.30	$1,397.50
Ashton Bryan (Associate) (2025)	$350	8.50	$2,975.00

Tayler Eynon (Associate) (2025)	$300	77.10	$23,130.00
Tayler Eynon (Associate) (2026)	$350	17.60	$6,160.00
Tayler Eynon (Associate) (2026)	$400	45.70	$18,280.00
Philip Leggio (Associate) (2023)	$550	6.90	$3,795.00
Raquel Panza (Associate) (2023)	$450	49.40	$22,230.00
Robert Rowley (Associate) (2022)	$450	97.20	$43,740.00
Newton Yu (Associate) (2023)	$300	2.00	$600.00
Newton Yu (Associate) (2024)	$300	22.90	$6,870.00
Newton Yu (Associate) (2025)	$350	42.20	$14,770.00
Newton Yu (Associate) (2026)	$425	18.10	$7,692.50
Allen Jones (Paralegal) (2023)	$390	10.50	$4,095.00
Allen Jones (Paralegal) (2025)	$400	3.60	$1,440.00
Allen Jones (Paralegal) (2026)	$440	0.90	$396.00
Francisco Malonzo (Paralegal) (2023)	$380	17.20	$6,536.00
Francisco Malonzo (Paralegal) (2024)	$380	2.90	$1,102.00
Francisco Malonzo (Paralegal) (2025)	$405	14.50	$5,872.50
Francisco Malonzo (Paralegal) (2026)	$445	9.50	$4,227.50

Sandy Manzolillo (Paralegal) (2022)	$390	7.50	$2,925.00
Sandy Manzolillo (Paralegal) (2023)	$390	4.00	$1,560.00
Euterpe Pina (Paralegal) (2022)	$375	7.70	$2,887.50
Euterpe Pina (Paralegal) (2023)	$375	10.30	$3,862.50
Robendranauth Ramphul (Paralegal) (2022-2023)	$390	28.90	$11,271.00
Denice Sosnoski (Paralegal) (2022)	$390	7.20	$2,808.00
Totals for Task 5:		**1,149.20**	**$657,580.50**

Task 6: Court Appearances & Prep			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Michael Canty (Partner) (2025)	$1,100	1.20	$1,320.00
Michael Rogers (Partner) (2023-2024)	$1,000	124.70	$124,700.00
Michael Rogers (Partner) (2025)	$1,050	92.50	$97,125.00
Michael Rogers (Partner) (2026)	$1,150	1.30	$1,495.00
Nicholas Manningham (Of Counsel) (2023)	$575	31.90	$18,342.50
Nicholas Manningham (Of Counsel) (2025)	$650	53.30	$34,645.00
Tayler Eynon (Associate) (2025)	$300	43.70	$13,110.00
Newton Yu (Associate) (2023-2024)	$300	130.40	$39,120.00

Allen Jones (Paralegal) (2023)	$390	11.50	$4,485.00
Allen Jones (Paralegal) (2024)	$375	0.90	$337.50
Allen Jones (Paralegal) (2025)	$400	2.00	$800.00
Robendranauth Ramphul (Paralegal) (2023)	$390	4.50	$1,755.00
Totals for Task 6:		**497.90**	**$337,235.00**

Task 7: Work with Experts/Consultants			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Michael Canty (Partner) (2026)	$1,300	6.60	$8,580.00
Michael Rogers (Partner) (2022)	$975	0.90	$877.50
Michael Rogers (Partner) (2023)	$1,000	0.80	$800.00
Michael Rogers (Partner) (2025)	$1,050	2.50	$2,625.00
Michael Rogers (Partner) (2026)	$1,150	55.60	$63,940.00
Derick Cividini (Of Counsel) (2026)	$950	1.60	$1,520.00
Nicholas Manningham (Of Counsel) (2022)	$475	0.80	$380.00
Nicholas Manningham (Of Counsel) (2026)	$800	7.40	$5,920.00
Timothy Barrett (Associate) (2026)	$700	7.50	$5,250.00
Tayler Eynon (Associate) (2026)	$350	2.10	$735.00
Tayler Eynon (Associate) (2026)	$400	2.60	$1,040.00

Newton Yu (Associate) (2026)	$425	19.50	$8,287.50
Sheela Aiyappasamy (Staff Attorney) (2026)	$530	1.50	$795.00
Vivianne Brissett (Staff Attorney) (2026)	$550	9.30	$5,115.00
Kris W. Druhm (Staff Attorney) (2026)	$550	6.00	$3,300.00
Todd S. Kussin (Staff Attorney) (2026)	$505	27.90	$14,089.50
Allen Jones (Paralegal) (2026)	$440	1.60	$704.00
Francisco Malonzo (Paralegal) (2026)	$445	12.60	$5,607.00
Totals for Task 7:		**166.80**	**$129,565.50**

Task 8: Case Management			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Michael Canty (Partner) (2023)	$1,025	0.50	$512.50
Michael Rogers (Partner) (2022)	$975	8.70	$8,482.50
Michael Rogers (Partner) (2023-2024)	$1,000	18.40	$18,400.00
Michael Rogers (Partner) (2025)	$1,050	0.70	$735.00
Michael Rogers (Partner) (2026)	$1,150	15.30	$17,595.00
Ira Schochet (Partner) (2022)	$1,150	0.50	$575.00
Nicholas Manningham (Of Counsel) (2022)	$475	1.60	$760.00
Nicholas Manningham (Of Counsel) (2023)	$575	2.40	$1,380.00

Nicholas Manningham (Of Counsel) (2024)	$600	6.30	$3,780.00
Nicholas Manningham (Of Counsel) (2026)	$800	0.60	$480.00
Timothy Barrett (Associate) (2026)	$700	1.80	$1,260.00
Tayler Eynon (Associate) (2025)	$300	8.60	$2,580.00
Tayler Eynon (Associate) (2026)	$350	1.70	$595.00
Tayler Eynon (Associate) (2026)	$400	12.50	$5,000.00
Philip Leggio (Associate) (2023)	$550	6.40	$3,520.00
Charles Stiene (Associate) (2023)	$475	0.30	$142.50
Newton Yu (Associate) (2024)	$300	2.70	$810.00
Newton Yu (Associate) (2026)	$425	1.80	$765.00
Allen Jones (Paralegal) (2023)	$390	0.40	$156.00
Allen Jones (Paralegal) (2024)	$375	1.10	$412.50
Allen Jones (Paralegal) (2025)	$400	2.50	$1,000.00
Allen Jones (Paralegal) (2026)	$440	2.70	$1,188.00
Francisco Malonzo (Paralegal) (2023-2024)	$380	12.50	$4,750.00
Francisco Malonzo (Paralegal) (2025)	$405	4.20	$1,701.00
Francisco Malonzo (Paralegal) (2026)	$445	7.60	$3,382.00

Sandy Manzolillo (Paralegal) (2023)	$390	1.00	$390.00
Robendranauth Ramphul (Paralegal) (2022-2023)	$390	6.10	$2,379.00
Denice Sosnoski (Paralegal) (2022)	$390	2.20	$858.00
Totals for Task 8:		**131.10**	**$83,589.00**

Task 9: Settlement			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Eric Belfi (Partner) (2026)	$1,400	28.70	$40,180.00
Michael Canty (Partner) (2026)	$1,300	38.00	$49,400.00
Michael Rogers (Partner) (2026)	$1,150	166.90	$191,935.00
Nicole M. Zeiss (Partner) (2026)	$1,250	56.10	$70,125.00
Derick Cividini (Of Counsel) (2026)	$950	2.90	$2,755.00
Nicholas Manningham (Of Counsel) (2024)	$600	0.40	$240.00
Nicholas Manningham (Of Counsel) (2026)	$800	151.90	$121,520.00
Elizabeth Rosenberg (Of Counsel) (2026)	$1,025	102.70	$105,267.50
Timothy Barrett (Associate) (2026)	$700	3.30	$2,310.00
Tayler Eynon (Associate) (2026)	$400	64.50	$25,800.00
Charles Stiene (Associate) (2026)	$600	39.60	$23,760.00

Newton Yu (Associate) (2026)	$425	115.80	$49,215.00
Cheryl Boria (Paralegal) (2026)	$455	29.80	$13,559.00
Allen Jones (Paralegal) (2024)	$375	0.20	$75.00
Allen Jones (Paralegal) (2026)	$440	25.10	$11,044.00
Francisco Malonzo (Paralegal) (2024)	$380	2.90	$1,102.00
Francisco Malonzo (Paralegal) (2026)	$445	20.30	$9,033.50
Totals for Task 9:		**849.10**	**$717,321.00**

Task 10: Class Certification			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Eric Belfi (Partner) (2026)	$1,400	6.40	$8,960.00
Michael Canty (Partner) (2026)	$1,300	5.10	$6,630.00
Michael Rogers (Partner) (2025)	$1,050	5.40	$5,670.00
Michael Rogers (Partner) (2026)	$1,150	38.20	$43,930.00
Nicholas Manningham (Of Counsel) (2025)	$650	0.50	$325.00
Nicholas Manningham (Of Counsel) (2026)	$800	98.10	$78,480.00
Timothy Barrett (Associate) (2025)	$650	0.60	$390.00
Tayler Eynon (Associate) (2026)	$350	16.60	$5,810.00
Tayler Eynon (Associate) (2026)	$400	1.10	$440.00

Newton Yu (Associate) (2025)	$350	6.00	$2,100.00
Newton Yu (Associate) (2026)	$425	95.20	$40,460.00
Allen Jones (Paralegal) (2026)	$440	12.00	$5,280.00
Francisco Malonzo (Paralegal) (2026)	$445	15.90	$7,075.50
Totals for Task 10:		**301.10**	**$205,550.50**

Task 11: Strategy & Analysis			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Eric Belfi (Partner) (2026)	$1,400	0.50	$700.00
Michael Canty (Partner) (2024)	$1,025	2.20	$2,255.00
Michael Canty (Partner) (2025)	$1,100	1.60	$1,760.00
Michael Canty (Partner) (2026)	$1,300	1.60	$2,080.00
Jonathan Gardner (Partner) (2022)	$1,250	0.50	$625.00
Jonathan Gardner (Partner) (2023)	$1,275	1.00	$1,275.00
Jonathan Gardner (Partner) (2025)	$1,375	2.70	$3,712.50
James Johnson (Partner) (2022)	$1,250	1.40	$1,750.00
James Johnson (Partner) (2023)	$1,275	0.40	$510.00
Christopher Keller (Partner) (2022)	$1,300	43.50	$56,550.00
Michael Rogers (Partner) (2022)	$975	4.70	$4,582.50

Michael Rogers (Partner) (2023-2024)	$1,000	12.20	$12,200.00
Michael Rogers (Partner) (2025)	$1,050	24.50	$25,725.00
Michael Rogers (Partner) (2026)	$1,150	24.00	$27,600.00
Ira Schochet (Partner) (2022)	$1,150	1.30	$1,495.00
Derick Cividini (Of Counsel) (2023)	$750	0.60	$450.00
James Fee (Of Counsel) (2023)	$600	8.20	$4,920.00
Nicholas Manningham (Of Counsel) (2022)	$475	18.40	$8,740.00
Nicholas Manningham (Of Counsel) (2023)	$575	5.60	$3,220.00
Nicholas Manningham (Of Counsel) (2024)	$600	8.80	$5,280.00
Nicholas Manningham (Of Counsel) (2025)	$650	8.70	$5,655.00
Nicholas Manningham (Of Counsel) (2026)	$800	30.90	$24,720.00
Timothy Barrett (Associate) (2026)	$700	1.00	$700.00
Tayler Eynon (Associate) (2025)	$300	5.30	$1,590.00
Tayler Eynon (Associate) (2026)	$350	6.70	$2,345.00
Tayler Eynon (Associate) (2026)	$400	6.30	$2,520.00
Philip Leggio (Associate) (2022)	$525	1.00	$525.00
Philip Leggio (Associate) (2023)	$550	2.30	$1,265.00

Robert Rowley (Associate) (2022)	$450	0.80	$360.00
Charles Stiene (Associate) (2023)	$475	0.60	$285.00
Newton Yu (Associate) (2022)	$275	0.60	$165.00
Newton Yu (Associate) (2023)	$300	16.00	$4,800.00
Newton Yu (Associate) (2025)	$350	25.90	$9,065.00
Newton Yu (Associate) (2026)	$425	4.60	$1,955.00
Amy Greenbaum (Investigator) (2022)	$575	1.20	$690.00
Amy Greenbaum (Investigator) (2023)	$625	3.60	$2,250.00
Totals for Task 11:		**279.20**	**$224,320.00**

Task 12: Appeal			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Michael Canty (Partner) (2023-2024)	$1,025	6.80	$6,970.00
Michael Canty (Partner) (2025)	$1,100	4.70	$5,170.00
Michael Rogers (Partner) (2024)	$1,000	162.70	$162,700.00
Michael Rogers (Partner) (2025)	$1,050	133.70	$140,385.00
Ross Kamhi (Of Counsel) (2024)	$750	41.00	$30,750.00
Ross Kamhi (Of Counsel) (2025)	$800	47.20	$37,760.00
Nicholas Manningham (Of Counsel) (2024)	$600	92.80	$55,680.00

Nicholas Manningham (Of Counsel) (2025)	$650	43.20	$28,080.00
Ashton Bryan (Associate) (2024)	$300	4.50	$1,350.00
Ashton Bryan (Associate) (2025)	$325	0.10	$32.50
Philip Leggio (Associate) (2024)	$575	89.10	$51,232.50
Newton Yu (Associate) (2024)	$300	58.50	$17,550.00
Newton Yu (Associate) (2025)	$350	6.50	$2,275.00
Amy Greenbaum (Investigator) (2025)	$650	1.00	$650.00
Allen Jones (Paralegal) (2024)	$375	20.10	$7,537.50
Allen Jones (Paralegal) (2025)	$400	11.10	$4,440.00
Francisco Malonzo (Paralegal) (2024)	$380	43.60	$16,568.00
Francisco Malonzo (Paralegal) (2025)	$405	20.30	$8,221.50
Totals for Task 12:		**786.90**	**$577,352.00**

Grand Total		**16,406.10**	**$9,368,426.00**

Exhibit C

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc. et al.

EXHIBIT C

Partner: Jonathan Gardner			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$1,250	3.60	$4,500.00
1-Factual Investigation (2023-2024)	$1,275	1.40	$1,785.00
3-Fact Discovery (2025)	$1,375	0.50	$687.50
11-Strategy & Analysis (2022)	$1,250	0.50	$625.00
11-Strategy & Analysis (2023)	$1,275	1.00	$1,275.00
11-Strategy & Analysis (2025)	$1,375	2.70	$3,712.50
Total:		**9.70**	**$12,585.00**
Partner: Eric Belfi			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
9-Settlement (2026)	$1,400	28.70	$40,180.00
10-Class Certification (2026)	$1,400	6.40	$8,960.00
11-Strategy & Analysis (2026)	$1,400	0.50	$700.00
Total:		**35.60**	**$49,840.00**
Partner: Christopher Keller			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
11-Strategy & Analysis (2022)	$1,300	43.50	$56,550.00
Total:		**43.50**	**$56,550.00**

Partner: Michael Canty			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2023)	$1,025	2.90	$2,972.50
2-Drafting Complaints (2025)	$1,100	2.00	$2,200.00
3-Fact Discovery (2025)	$1,100	0.50	$550.00
3-Fact Discovery (2026)	$1,300	13.10	$17,030.00
6-Court Appearances & Prep (2025)	$1,100	1.20	$1,320.00
7-Work with Experts/Consultants (2026)	$1,300	6.60	$8,580.00
8-Case Management (2023)	$1,025	0.50	$512.50
9-Settlement (2026)	$1,300	38.00	$49,400.00
10-Class Certification (2026)	$1,300	5.10	$6,630.00
11-Strategy & Analysis (2024)	$1,025	2.20	$2,255.00
11-Strategy & Analysis (2025)	$1,100	1.60	$1,760.00
11-Strategy & Analysis (2026)	$1,300	1.60	$2,080.00
12-Appeal (2023-2024)	$1,025	6.80	$6,970.00
12-Appeal (2025)	$1,100	4.70	$5,170.00
Total:		**86.80**	**$107,430.00**
Partner: James Johnson			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$1,250	35.90	$44,875.00
2-Drafting Complaints (2022)	$1,250	47.10	$58,875.00
5-Motions & Legal Research (2022)	$1,250	31.70	$39,625.00
11-Strategy & Analysis (2022)	$1,250	1.40	$1,750.00
11-Strategy & Analysis (2023)	$1,275	0.40	$510.00
Total:		**116.50**	**$145,635.00**

Partner: Nicole Zeiss			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
9-Settlement (2026)	$1,250	56.10	$70,125.00
Total:		**56.10**	**$70,125.00**
Partner: Francis McConville			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2022)	$875	14.40	$12,600.00
5-Motions & Legal Research (2022)	$875	17.10	$14,962.50
Total:		**31.50**	**$27,562.50**
Partner: Ira Schochet			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$1,150	4.30	$4,945.00
2-Drafting Complaints (2022)	$1,150	72.10	$82,915.00
8-Case Management (2022)	$1,150	0.50	$575.00
11-Strategy & Analysis (2022)	$1,150	1.30	$1,495.00
Total:		**78.20**	**$89,930.00**
Partner: Michael Rogers			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$975	14.60	$14,235.00
1-Factual Investigation (2023)	$1,000	24.00	$24,000.00
1-Factual Investigation (2025)	$1,050	2.00	$2,100.00
2-Drafting Complaints (2022)	$975	65.80	$64,155.00
2-Drafting Complaints (2023)	$1,000	39.40	$39,400.00
2-Drafting Complaints (2025)	$1,050	36.40	$38,220.00
2-Drafting Complaints (2026)	$1,150	7.50	$8,625.00
3-Fact Discovery (2025)	$1,050	62.00	$65,100.00
3-Fact Discovery (2026)	$1,150	136.50	$156,975.00

4-Document Review (2026)	$1,150	5.40	$6,210.00
5-Motions & Legal Research (2022)	$975	55.90	$54,502.50
5-Motions & Legal Research (2023)	$1,000	52.80	$52,800.00
5-Motions & Legal Research (2025)	$1,050	37.20	$39,060.00
5-Motions & Legal Research (2026)	$1,150	8.60	$9,890.00
6-Court Appearances & Prep (2023-2024)	$1,000	124.70	$124,700.00
6-Court Appearances & Prep (2025)	$1,050	92.50	$97,125.00
6-Court Appearances & Prep (2026)	$1,150	1.30	$1,495.00
7-Work with Experts/Consultants (2022)	$975	0.90	$877.50
7-Work with Experts/Consultants (2023)	$1,000	0.80	$800.00
7-Work with Experts/Consultants (2025)	$1,050	2.50	$2,625.00
7-Work with Experts/Consultants (2026)	$1,150	55.60	$63,940.00
8-Case Management (2022)	$975	8.70	$8,482.50
8-Case Management (2023-2024)	$1,000	18.40	$18,400.00
8-Case Management (2025)	$1,050	0.70	$735.00
8-Case Management (2026)	$1,150	15.30	$17,595.00
9-Settlement (2026)	$1,150	166.90	$191,935.00
10-Class Certification (2025)	$1,050	5.40	$5,670.00
10-Class Certification (2026)	$1,150	38.20	$43,930.00
11-Strategy & Analysis (2022)	$975	4.70	$4,582.50
11-Strategy & Analysis (2023-2024)	$1,000	12.20	$12,200.00
11-Strategy & Analysis (2025)	$1,050	24.50	$25,725.00

11-Strategy & Analysis (2026)	$1,150	24.00	$27,600.00
12-Appeal (2024)	$1,000	162.70	$162,700.00
12-Appeal (2025)	$1,050	133.70	$140,385.00
Total:		**1,441.80**	**$1,526,775.00**
Of Counsel: Elizabeth Rosenberg			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
9-Settlement (2026)	$1,025	102.70	$105,267.50
Total:		**102.70**	**$105,267.50**
Of Counsel: Derick Cividini			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
3-Fact Discovery (2025)	$850	35.50	$30,175.00
3-Fact Discovery (2026)	$950	184.10	$174,895.00
7-Work with Experts/Consultants (2026)	$950	1.60	$1,520.00
9-Settlement (2026)	$950	2.90	$2,755.00
11-Strategy & Analysis (2023)	$750	0.60	$450.00
Total:		**224.70**	**$209,795.00**
Of Counsel: Ross Kamhi			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
5-Motions & Legal Research (2024)	$750	48.10	$36,075.00
12-Appeal (2024)	$750	41.00	$30,750.00
12-Appeal (2025)	$800	47.20	$37,760.00
Total:		**136.30**	**$104,585.00**
Of Counsel: William Schervish II			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$625	3.30	$2,062.50

2-Drafting Complaints (2022)	$625	11.80	$7,375.00
Total:		**15.10**	**$9,437.50**
Of Counsel: James Fee			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2023)	$600	8.00	$4,800.00
2-Drafting Complaints (2022)	$575	7.40	$4,255.00
2-Drafting Complaints (2023)	$600	36.90	$22,140.00
3-Fact Discovery (2023)	$600	11.50	$6,900.00
5-Motions & Legal Research (2023)	$600	0.60	$360.00
11-Strategy & Analysis (2023)	$600	8.20	$4,920.00
Total:		**72.60**	**$43,375.00**
Of Counsel: Nicholas Manningham			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$475	88.30	$41,942.50
2-Drafting Complaints (2022)	$475	183.40	$87,115.00
2-Drafting Complaints (2023)	$575	2.00	$1,150.00
2-Drafting Complaints (2025)	$650	24.00	$15,600.00
2-Drafting Complaints (2026)	$800	5.10	$4,080.00
3-Fact Discovery (2023)	$575	5.40	$3,105.00
3-Fact Discovery (2024)	$600	0.30	$180.00
3-Fact Discovery (2025)	$650	61.20	$39,780.00
3-Fact Discovery (2026)	$800	223.40	$178,720.00
4-Document Review (2026)	$800	11.70	$9,360.00
5-Motions & Legal Research (2022)	$475	160.90	$76,427.50
5-Motions & Legal Research (2023)	$575	117.00	$67,275.00
5-Motions & Legal Research (2024)	$600	5.00	$3,000.00

5-Motions & Legal Research (2025)	$650	90.70	$58,955.00
5-Motions & Legal Research (2026)	$800	4.00	$3,200.00
6-Court Appearances & Prep (2023)	$575	31.90	$18,342.50
6-Court Appearances & Prep (2025)	$650	53.30	$34,645.00
7-Work with Experts/Consultants (2022)	$475	0.80	$380.00
7-Work with Experts/Consultants (2026)	$800	7.40	$5,920.00
8-Case Management (2022)	$475	1.60	$760.00
8-Case Management (2023)	$575	2.40	$1,380.00
8-Case Management (2024)	$600	6.30	$3,780.00
8-Case Management (2026)	$800	0.60	$480.00
9-Settlement (2024)	$600	0.40	$240.00
9-Settlement (2026)	$800	151.90	$121,520.00
10-Class Certification (2025)	$650	0.50	$325.00
10-Class Certification (2026)	$800	98.10	$78,480.00
11-Strategy & Analysis (2022)	$475	18.40	$8,740.00
11-Strategy & Analysis (2023)	$575	5.60	$3,220.00
11-Strategy & Analysis (2024)	$600	8.80	$5,280.00
11-Strategy & Analysis (2025)	$650	8.70	$5,655.00
11-Strategy & Analysis (2026)	$800	30.90	$24,720.00
12-Appeal (2024)	$600	92.80	$55,680.00
12-Appeal (2025)	$650	43.20	$28,080.00
Total:		**1,546.00**	**$987,517.50**
Associate: Timothy Barrett			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
3-Fact Discovery (2025)	$650	17.20	$11,180.00
3-Fact Discovery (2026)	$700	354.90	$248,430.00

7-Work with Experts/Consultants (2026)	$700	7.50	$5,250.00
8-Case Management (2026)	$700	1.80	$1,260.00
9-Settlement (2026)	$700	3.30	$2,310.00
10-Class Certification (2025)	$650	0.60	$390.00
11-Strategy & Analysis (2026)	$700	1.00	$700.00
Total:		**386.30**	**$269,520.00**
Associate: Charles Stiene			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2023)	$475	1.10	$522.50
3-Fact Discovery (2023)	$475	0.40	$190.00
8-Case Management (2023)	$475	0.30	$142.50
9-Settlement (2026)	$600	39.60	$23,760.00
11-Strategy & Analysis (2023)	$475	0.60	$285.00
Total:		**42.00**	**$24,900.00**
Associate: Philip Leggio			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$525	23.30	$12,232.50
2-Drafting Complaints (2023)	$550	67.50	$37,125.00
3-Fact Discovery (2022)	$525	0.70	$367.50
3-Fact Discovery (2023)	$550	2.90	$1,595.00
5-Motions & Legal Research (2023)	$550	6.90	$3,795.00
8-Case Management (2023)	$550	6.40	$3,520.00
11-Strategy & Analysis (2022)	$525	1.00	$525.00
11-Strategy & Analysis (2023)	$550	2.30	$1,265.00
12-Appeal (2024)	$575	89.10	$51,232.50
Total:		**200.10**	**$111,657.50**

Associate: Robert Rowley			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2022)	$450	2.00	$900.00
5-Motions & Legal Research (2022)	$450	97.20	$43,740.00
11-Strategy & Analysis (2022)	$450	0.80	$360.00
Total:		**100.00**	**$45,000.00**
Associate: Raquel Panza			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2023)	$450	10.10	$4,545.00
5-Motions & Legal Research (2023)	$450	49.40	$22,230.00
Total:		**59.50**	**$26,775.00**
Associate: Newton Yu			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$275	44.70	$12,292.50
2-Drafting Complaints (2024)	$300	1.80	$540.00
2-Drafting Complaints (2025)	$350	8.40	$2,940.00
3-Fact Discovery (2025)	$350	62.00	$21,700.00
3-Fact Discovery (2026)	$425	328.20	$139,485.00
5-Motions & Legal Research (2023-2024)	$300	24.90	$7,470.00
5-Motions & Legal Research (2025)	$350	42.20	$14,770.00
5-Motions & Legal Research (2026)	$425	18.10	$7,692.50
6-Court Appearances & Prep (2023-2024)	$300	130.40	$39,120.00
7-Work with Experts/Consultants (2026)	$425	19.50	$8,287.50

8-Case Management (2024)	$300	2.70	$810.00
8-Case Management (2026)	$425	1.80	$765.00
9-Settlement (2026)	$425	115.80	$49,215.00
10-Class Certification (2025)	$350	6.00	$2,100.00
10-Class Certification (2026)	$425	95.20	$40,460.00
11-Strategy & Analysis (2022)	$275	0.60	$165.00
11-Strategy & Analysis (2023)	$300	16.00	$4,800.00
11-Strategy & Analysis (2025)	$350	25.90	$9,065.00
11-Strategy & Analysis (2026)	$425	4.60	$1,955.00
12-Appeal (2024)	$300	58.50	$17,550.00
12-Appeal (2025)	$350	6.50	$2,275.00
Total:		**1,013.80**	**$383,457.50**
Associate: Tayler Eynon			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2025)	$300	51.50	$15,450.00
2-Drafting Complaints (2026)	$350	1.00	$350.00
3-Fact Discovery (2025)	$300	85.70	$25,710.00
3-Fact Discovery (2026)	$350	120.10	$42,035.00
3-Fact Discovery (2026)	$400	77.00	$30,800.00
4-Document Review (2026)	$350	3.00	$1,050.00
4-Document Review (2026)	$400	0.20	$80.00
5-Motions & Legal Research (2025)	$300	77.10	$23,130.00
5-Motions & Legal Research (2026)	$350	17.60	$6,160.00
5-Motions & Legal Research (2026)	$400	45.70	$18,280.00
6-Court Appearances & Prep (2025)	$300	43.70	$13,110.00
7-Work with Experts/Consultants (2026)	$350	2.10	$735.00
7-Work with Experts/Consultants (2026)	$400	2.60	$1,040.00

8-Case Management (2025)	$300	8.60	$2,580.00
8-Case Management (2026)	$350	1.70	$595.00
8-Case Management (2026)	$400	12.50	$5,000.00
9-Settlement (2026)	$400	64.50	$25,800.00
10-Class Certification (2026)	$350	16.60	$5,810.00
10-Class Certification (2026)	$400	1.10	$440.00
11-Strategy & Analysis (2025)	$300	5.30	$1,590.00
11-Strategy & Analysis (2026)	$350	6.70	$2,345.00
11-Strategy & Analysis (2026)	$400	6.30	$2,520.00
Total:		**650.60**	**$224,610.00**
Associate: Ashton Bryan			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
5-Motions & Legal Research (2023)	$275	3.00	$825.00
5-Motions & Legal Research (2025)	$325	4.30	$1,397.50
5-Motions & Legal Research (2025)	$350	8.50	$2,975.00
12-Appeal (2024)	$300	4.50	$1,350.00
12-Appeal (2025)	$325	0.10	$32.50
Total:		**20.40**	**$6,580.00**
Staff Attorney: Kris Druhm			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
3-Fact Discovery (2026)	$550	3.50	$1,925.00
4-Document Review (2026)	$550	692.70	$380,985.00
7-Work with Experts/Consultants (2026)	$550	6.00	$3,300.00
Total:		**702.20**	**$386,210.00**

Staff Attorney: Vivianne Brissett			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$550	44.50	$24,475.00
7-Work with Experts/Consultants (2026)	$550	9.30	$5,115.00
Total:		**53.80**	**$29,590.00**
Staff Attorney: Adam Drapkin			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$530	305.40	$161,862.00
Total:		**305.40**	**$161,862.00**
Staff Attorney: Sheela Aiyappasamy			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$530	244.70	$129,691.00
7-Work with Experts/Consultants (2026)	$530	1.50	$795.00
Total:		**246.20**	**$130,486.00**
Staff Attorney: William Coyle			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$525	612.80	$321,720.00
Total:		**612.80**	**$321,720.00**
Staff Attorney: Mark Farinella			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$525	407.80	$214,095.00
Total:		**407.80**	**$214,095.00**

Staff Attorney: Leslie Martey			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$525	382.00	$200,550.00
Total:		**382.00**	**$200,550.00**
Staff Attorney: Adedapo Atilade			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$525	311.60	$163,590.00
Total:		**311.60**	**$163,590.00**
Staff Attorney: Migiwa Hayashi			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$525	231.00	$121,275.00
Total:		**231.00**	**$121,275.00**
Staff Attorney: Susan Rubinstein			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$525	176.00	$92,400.00
Total:		**176.00**	**$92,400.00**
Staff Attorney: Justin Rosenberg			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$505	312.00	$157,560.00
Total:		**312.00**	**$157,560.00**
Staff Attorney: Kendall Wostl			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$505	281.80	$142,309.00
Total:		**281.80**	**$142,309.00**

Staff Attorney: Jody Brockman			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$505	130.90	$66,104.50
Total:		**130.90**	**$66,104.50**
Staff Attorney: Todd Kussin			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$505	38.10	$19,240.50
7-Work with Experts/Consultants (2026)	$505	27.90	$14,089.50
Total:		**66.00**	**$33,330.00**
Staff Attorney: Jenetha Philbert			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$500	265.90	$132,950.00
Total:		**265.90**	**$132,950.00**
Staff Attorney: Christopher Clarkin			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$475	306.10	$145,397.50
Total:		**306.10**	**$145,397.50**
Staff Attorney: Sahar Hamlani			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$450	668.50	$300,825.00
Total:		**668.50**	**$300,825.00**
Staff Attorney: Andrew Bagwell			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$440	425.20	$187,088.00

Total:		**425.20**	**$187,088.00**
Staff Attorney: Eugene Weber			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$440	313.00	$137,720.00
Total:		**313.00**	**$137,720.00**
Staff Attorney: Kevin Carty			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$440	241.50	$106,260.00
Total:		**241.50**	**$106,260.00**
Staff Attorney: Cecile Wortman			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$425	676.00	$287,300.00
Total:		**676.00**	**$287,300.00**
Staff Attorney: Bryan Reid			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$425	553.00	$235,025.00
Total:		**553.00**	**$235,025.00**
Staff Attorney: Deborah Boadi			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$425	274.00	$116,450.00
Total:		**274.00**	**$116,450.00**
Staff Attorney: Sadaf Abidi			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$425	182.20	$77,435.00

Total:		**182.20**	**$77,435.00**
Staff Attorney: Jocia Edwards			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$425	13.60	$5,780.00
Total:		**13.60**	**$5,780.00**
Staff Attorney: Michael Divers			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$405	398.10	$161,230.50
Total:		**398.10**	**$161,230.50**
Staff Attorney: Anglina Sanchez			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
4-Document Review (2026)	$405	211.40	$85,617.00
Total:		**211.40**	**$85,617.00**
Investigator: Amy Greenbaum			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$575	43.70	$25,127.50
1-Factual Investigation (2023-2024)	$625	56.80	$35,500.00
1-Factual Investigation (2025)	$650	0.70	$455.00
2-Drafting Complaints (2024)	$625	1.50	$937.50
3-Fact Discovery (2025)	$650	9.90	$6,435.00
3-Fact Discovery (2026)	$700	2.50	$1,750.00
11-Strategy & Analysis (2022)	$575	1.20	$690.00
11-Strategy & Analysis (2023)	$625	3.60	$2,250.00
12-Appeal (2025)	$650	1.00	$650.00
Total:		**120.90**	**$73,795.00**

Investigator: Connor Rutherford			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$400	66.10	$26,440.00
1-Factual Investigation (2023)	$450	16.90	$7,605.00
1-Factual Investigation (2025)	$525	25.70	$13,492.50
1-Factual Investigation (2026)	$575	0.60	$345.00
Total:		**109.30**	**$47,882.50**
Investigator: Steven Megibow			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$425	195.90	$83,257.50
1-Factual Investigation (2023-2024)	$475	187.10	$88,872.50
1-Factual Investigation (2025)	$500	4.40	$2,200.00
1-Factual Investigation (2026)	$550	0.80	$440.00
Total:		**388.20**	**$174,770.00**
Paralegal: Cheryl Boria			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
9-Settlement (2026)	$455	29.80	$13,559.00
Total:		**29.80**	**$13,559.00**
Paralegal: Francisco Malonzo			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$380	0.80	$304.00
2-Drafting Complaints (2023)	$380	8.70	$3,306.00
2-Drafting Complaints (2025)	$405	0.90	$364.50
2-Drafting Complaints (2026)	$445	0.80	$356.00
3-Fact Discovery (2025)	$405	9.80	$3,969.00
3-Fact Discovery (2026)	$445	55.50	$24,697.50

5-Motions & Legal Research (2023-2024)	$380	20.10	$7,638.00
5-Motions & Legal Research (2025)	$405	14.50	$5,872.50
5-Motions & Legal Research (2026)	$445	9.50	$4,227.50
7-Work with Experts/Consultants (2026)	$445	12.60	$5,607.00
8-Case Management (2023-2024)	$380	12.50	$4,750.00
8-Case Management (2025)	$405	4.20	$1,701.00
8-Case Management (2026)	$445	7.60	$3,382.00
9-Settlement (2024)	$380	2.90	$1,102.00
9-Settlement (2026)	$445	20.30	$9,033.50
10-Class Certification (2026)	$445	15.90	$7,075.50
12-Appeal (2024)	$380	43.60	$16,568.00
12-Appeal (2025)	$405	20.30	$8,221.50
Total:		**260.50**	**$108,175.50**
Paralegal: Allen Jones			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2025)	$400	2.40	$960.00
2-Drafting Complaints (2023)	$390	8.10	$3,159.00
2-Drafting Complaints (2025)	$400	6.90	$2,760.00
2-Drafting Complaints (2026)	$440	2.20	$968.00
3-Fact Discovery (2025)	$400	5.30	$2,120.00
3-Fact Discovery (2026)	$440	10.10	$4,444.00
5-Motions & Legal Research (2023)	$390	10.50	$4,095.00
5-Motions & Legal Research (2025)	$400	3.60	$1,440.00
5-Motions & Legal Research (2026)	$440	0.90	$396.00

6-Court Appearances & Prep (2024)	$375	0.90	$337.50
6-Court Appearances & Prep (2023)	$390	11.50	$4,485.00
6-Court Appearances & Prep (2025)	$400	2.00	$800.00
7-Work with Experts/Consultants (2026)	$440	1.60	$704.00
8-Case Management (2024)	$375	1.10	$412.50
8-Case Management (2023)	$390	0.40	$156.00
8-Case Management (2025)	$400	2.50	$1,000.00
8-Case Management (2026)	$440	2.70	$1,188.00
9-Settlement (2024)	$375	0.20	$75.00
9-Settlement (2026)	$440	25.10	$11,044.00
10-Class Certification (2026)	$440	12.00	$5,280.00
12-Appeal (2024)	$375	20.10	$7,537.50
12-Appeal (2025)	$400	11.10	$4,440.00
Total:		**141.20**	**$57,801.50**
Paralegal: Denise Rogers			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$375	17.00	$6,375.00
2-Drafting Complaints (2022)	$375	5.20	$1,950.00
Total:		**22.20**	**$8,325.00**
Paralegal: Robendranauth Ramphul			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2023)	$390	12.70	$4,953.00
5-Motions & Legal Research (2022-2023)	$390	28.90	$11,271.00
6-Court Appearances & Prep (2023)	$390	4.50	$1,755.00

8-Case Management (2022-2023)	$390	6.10	$2,379.00
Total:		**52.20**	**$20,358.00**
Paralegal: Denice Sosnoski			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
1-Factual Investigation (2022)	$390	5.70	$2,223.00
2-Drafting Complaints (2022)	$390	18.40	$7,176.00
5-Motions & Legal Research (2022)	$390	7.20	$2,808.00
8-Case Management (2022)	$390	2.20	$858.00
Total:		**33.50**	**$13,065.00**
Paralegal: Sandy Manzolillo			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
5-Motions & Legal Research (2022-2023)	$390	11.50	$4,485.00
8-Case Management (2023)	$390	1.00	$390.00
Total:		**12.50**	**$4,875.00**
Paralegal: Euterpe Pina			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
5-Motions & Legal Research (2022-2023)	$375	18.00	$6,750.00
Total:		**18.00**	**$6,750.00**
Grand Total:		**16,406.10**	**$9,368,426.00**

Exhibit D

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc. et al.

EXHIBIT D

EXPENSE REPORT

FIRM: LABATON KELLER SUCHAROW LLP
REPORTING PERIOD: INCEPTION THROUGH NOVEMBER 10, 2026

CATEGORY		TOTAL AMOUNT
Filing / Witness / Service Fees		$3,321.43
Long Distance Telephone / Wifi/ Conference Calls		$456.39
Court & Deposition Transcripts		$220.00
Postage / Overnight Delivery Services		$3,420.76
Experts/Consultants		$71,461.00
Damages/Loss Causation/Plan of Allocation	$63,003.50	
Post-Acquisition Accounting	$8,457.50	
Litigation Support		$11,728.13
Counsel for Confidential Witnesses		$6,345.00
Work-Related Transportation / Hotels / Meals *		$33,153.64
Online Legal & Factual Research		$34,951.29
Duplicating		$8,887.32
Outside:	$94.72	
In-House Color: (17,128 pages at $0.40 per page)	$6,851.20	
In-House BW: (9,707 pages at $0.20 per page)	$1,941.40	
Contribution to Litigation Expense Fund		$138,025.03
Unpaid Balance in Litigation Expense Fund		$88,990.74
TOTAL		**$400,960.73**

* The total for Work-Related Transportation, Hotels & Meals includes $6,600 in estimated travel costs in connection with attending the final Settlement Hearing. If less than this estimate is incurred, the Settlement Fund will be refunded. If more is incurred, $6,600 will be the cap.

EXHIBIT E

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc. et al.

EXHIBIT E

LITIGATION EXPENSE FUND

CONTRIBUTIONS:		***TOTALS***
Labaton Keller Sucharow LLP		$138,025.03
Robbins Geller Rudman & Dowd LLP		$30,000.00
TOTAL CONTRIBUTIONS		**$168,025.03**
EXPENSES INCURRED BY THE LITIGATION EXPENSE FUND:		
Service Fees		$1,866.60
Counsel for Confidential Witnesses		$185.00
Experts/Consultants		$139,509.75
Damages/Loss Causation/Plan of Allocation	$135,529.75	
Post-Acquisition Accounting	$3,980.00	
Mediation		$51,137.50
Deposition Transcripts		$4,170.54
Litigation Support		$60,146.38
TOTAL EXPENSES OF THE LITIGATION EXPENSE FUND		**$257,015.77**
OUTSTANDING BALANCE IN LITIGATION EXPENSE FUND AS OF NOVEMBER 6, 2026		**($88,990.74)**

EXHIBIT F

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc. et al.

EXHIBIT F

FIRM RESUME

Labaton Keller Sucharow

2026

Labaton Keller Sucharow Credentials

New York | Delaware | London | Washington, D.C.

Labaton Keller Sucharow

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Labaton Keller Sucharow

About the Firm

Labaton Keller Sucharow has recovered billions of dollars for investors, businesses, and consumers

Founded in 1963, Labaton Keller Sucharow LLP has earned a reputation as one of the leading plaintiffs' firms in the United States. For more than 60 years, Labaton Keller Sucharow has successfully exposed corporate misconduct and recovered billions of dollars in the United States and around the globe on behalf of investors and consumers. Our mission is to continue this legacy and to continue to advance market fairness and transparency in the areas of securities, corporate governance and shareholder rights, and consumer protection and data privacy litigation, as well as alternative dispute resolution. Our Firm has recovered significant losses for investors and secured corporate governance reforms on behalf of the nation's largest institutional investors, including public pension, Taft-Hartley, and hedge funds, investment banks, and other financial institutions.

Along with securing newsworthy recoveries, the Firm has a track record for successfully prosecuting complex cases from discovery to trial to verdict. As *Chambers and Partners* has noted, the Firm is ***"considered one of the greatest plaintiffs' firms,"*** and *The National Law Journal* "Elite Trial Lawyers" recently recognized our attorneys for their ***"cutting-edge work on behalf of plaintiffs."*** Our appellate experience includes winning appeals that increased settlement values for clients and securing a landmark U.S. Supreme Court victory in 2013 that benefited all investors by reducing barriers to the certification of securities class action cases.

Our Firm provides global securities portfolio monitoring and advisory services to more than 350 institutional investors, including public pension funds, asset managers, hedge funds, mutual funds, banks, sovereign wealth funds, and multi-employer plans—with collective assets under management (AUM) in excess of $6 trillion. We are equipped to deliver results due to our robust infrastructure of more than 90 full-time attorneys, a dynamic professional staff, and innovative technological resources. Labaton Keller Sucharow attorneys are skilled in every stage of business litigation and have challenged corporations from every sector of the financial market. Our professional staff includes financial analysts, paralegals, e-discovery specialists, certified public accountants, certified fraud examiners, and a forensic accountant. We have one of the largest in-house investigative teams in the securities bar.

Securities Litigation: As a leader in the securities litigation field, the Firm is a trusted advisor to more than 350 institutional investors with collective assets under management in excess of $6 trillion. Our practice focuses on portfolio monitoring and domestic and international securities litigation for sophisticated institutional investors. Since the passage of the Private Securities Litigation Reform Act of 1995, we have recovered more than $30 billion in the aggregate. Our success is driven by the Firm's robust infrastructure, which includes one of the largest in-house investigative teams in the plaintiffs' bar.

Corporate Governance and Shareholder Rights Litigation: Our breadth of experience in shareholder advocacy has also taken us to Delaware, where we press for corporate reform through our Wilmington office. These efforts have already earned us a string of enviable successes, including the historic $1 billion cash settlement three weeks before trial *in In re Dell Technologies Inc. Class V Stockholders Litigation*, the largest shareholder settlement ever in any state court in America and the 17th largest shareholder settlement of all time in federal and state court, and a $153.75 million settlement on behalf of shareholders *in In re Freeport-McMoRan Copper & Gold Inc. Derivative Litigation*, one of the largest derivative settlements ever achieved in the Court of Chancery.

Consumer Protection and Data Privacy Litigation: Labaton Keller Sucharow is dedicated to putting our expertise to work on behalf of consumers who have been wronged by fraud in the marketplace. Built on our world-class litigation skills, deep understanding of federal and state rules and regulations, and an unwavering commitment to fairness, our Consumer Protection and Data Privacy Litigation focuses on protecting consumers and improving the standards of business conduct through litigation and reform. Our team achieved a historic $650 million settlement in *the In re Facebook Biometric Information Privacy Litigation* matter—the largest consumer data privacy settlement ever, and one of the first cases asserting biometric privacy rights of consumers under Illinois' Biometric Information Privacy Act (BIPA).

"Labaton Keller Sucharow is 'superb' and 'at the top of its game.' The Firm's team of 'hard-working lawyers…push themselves to thoroughly investigate the facts' and conduct 'very diligent research.'"

– The Legal 500

Labaton Keller Sucharow

Securities Class Action Litigation Practice

Labaton Keller Sucharow has been an advocate and trusted partner on behalf of institutional investors for more than 60 years. As a result of the significant victories the Firm has obtained for clients, Labaton Keller Sucharow has earned a reputation as a leading law firm for pension funds, asset managers, and other large institutional investors across the world.

Since the passage of the Private Securities Litigation Reform Act of 1995 (PSLRA), the Firm has recovered more than **$30 billion** for injured investors through securities class actions prosecuted throughout the United States against numerous public corporations and other corporate wrongdoers.

We have earned the trust of our clients and the courts, serving as lead counsel in some of the most intricate and high-profile securities fraud cases in history. These notable recoveries would not be possible without our exhaustive case evaluation process, which allows our securities litigators to focus solely on cases with strong merits. The benefits of our selective approach are reflected in the low dismissal rate of the securities cases we pursue, a rate well below the industry average.

Our attorneys are skilled in every stage of business litigation and have challenged corporations from every sector of the financial markets. More than half of the Firm's partners have trial experience. In many instances, this broad experience with every stage of litigation is supplemented by knowledge and expertise gained from prior professional experience. For example, seven of the Firm's partners have worked in government, including the Department of Justice (DOJ).

From investigation to the litigation of claims, we work closely with our clients to provide the information and analysis necessary to fully protect their investments. Labaton Keller Sucharow is one of the first firms in the country to have a dedicated, in-house investigations department. ***The Firm stands out in the securities class action bar in that our monitoring, investigation, and litigation services are all performed in-house.***

The Firm's success is reflected in the results Labaton Keller Sucharow achieves for its clients. Our world-class case evaluation and development services are informed by our experience serving as lead/co-lead counsel in more than 300 U.S. federal securities class actions.

Representative Experience

Labaton Keller Sucharow has achieved notable successes in financial and securities class actions on behalf of investors, including the following:

In re American International Group, Inc. Securities Litigation

In one of the most complex and challenging securities cases in history, Labaton Keller Sucharow secured more than **$1 billion** in recoveries on behalf of co-lead plaintiffs Ohio Public Employees Retirement System, State Teachers Retirement System of Ohio, and Ohio Police and Fire Pension Fund in a case arising from allegations of bid rigging and accounting fraud. To achieve this remarkable recovery, the Firm took over 100 depositions and briefed 22 motions to dismiss. The full settlement entailed a $725 million settlement with American International Group (AIG), a $97.5 million settlement with AIG's auditors, a $115 million settlement with former AIG officers and related defendants, and an additional $72 million settlement with General Reinsurance Corporation.

In re Countrywide Financial Corp. Securities Litigation

Labaton Keller Sucharow, as lead counsel for the New York State Common Retirement Fund and the five New York City public pension funds, secured a $624 million settlement on behalf of investors in one of the nation's largest issuers of mortgage loans. The Firm's focused investigation and discovery efforts uncovered incriminating evidence of credit risk misrepresentations. The settlement is one of the top 20 securities class action settlements in the history of the PSLRA.

In re Apple Inc. Securities Litigation

Labaton Keller Sucharow secured a $490 million settlement on behalf of our client the Employees' Retirement System of the State of Rhode Island. The case involves Apple's January 2017 software update that allegedly secretly slowed the performance of certain iPhones with battery-related issues, leading consumers to prematurely believe their devices had become obsolete and upgrade their iPhones at a fast rate. Apple revealed it had been intentionally slowing down certain iPhones, also disclosing that the problem was battery-related, as opposed to device-related, and offered discounted replacement batteries throughout 2018 in light of public outrage. The deliberate materially false and misleading statements also disregarded the U.S.-China trade war, declining Chinese economy, and the strength of the U.S. dollar had negatively impacted demand for iPhones in Greater China, Apple's third-largest marketing and most important growth market.

In re HealthSouth Corp. Securities Litigation

Labaton Keller Sucharow served as co-lead counsel to New Mexico State Investment Council in a case stemming from one of the largest frauds ever perpetrated in the healthcare industry. The $671 million settlement recovered for the class is one of the top 15 securities class action settlements of all time. In early 2006, lead plaintiffs negotiated a settlement of $445 million with defendant HealthSouth. In 2009, the court also granted final approval to a $109 million settlement with defendant Ernst & Young LLP. In addition, in 2010, the court granted final approval to a $117 million settlement with the remaining principal defendants in the case—UBS AG, UBS Warburg LLC, Howard Capek, Benjamin Lorello, and William McGahan.

In re Schering-Plough/ENHANCE Securities Litigation

As co-lead counsel, Labaton Keller Sucharow secured a $473 million settlement on behalf of co-lead plaintiff Massachusetts Pension Reserves Investment Management Board. The settlement was approved after five years of litigation and just three weeks before trial. This recovery is one of the largest securities fraud class action settlements against a pharmaceutical company. The Special Masters' Report noted, "The outstanding result achieved for the class is the direct product of outstanding skill and perseverance by Co-Lead Counsel . . . no one else . . . could have produced the result here—no government agency or corporate litigant to lead the charge and the Settlement Fund is the product solely of the efforts of Plaintiffs' Counsel."

In re Waste Management, Inc. Securities Litigation

Labaton Keller Sucharow achieved an extraordinary settlement that provided for the recovery of $457 million in cash, plus an array of far-reaching corporate governance measures. Labaton Keller Sucharow represented lead plaintiff Connecticut Retirement Plans and Trust Funds. At the time of the settlement, it was the largest common fund settlement of a securities action achieved in any court within the Fifth Circuit and the third largest achieved in any federal court in the nation.

In re General Motors Corp. Securities Litigation

Labaton Keller Sucharow secured a settlement of $303 million as co-lead counsel in a case against automotive giant General Motors (GM) and its auditor Deloitte & Touche LLP (Deloitte). The final settlement is one of the largest settlements ever secured in the early stages of a securities fraud case, which consisted of a cash payment of $277 million by GM and $26 million in cash from Deloitte. Lead plaintiff Deka Investment GmbH alleged that GM, its officers, and its outside auditor overstated GM's income by billions of dollars and GM's operating cash flows by tens of billions of dollars, through a series of accounting manipulations.

Wyatt v. El Paso Corp.

Labaton Keller Sucharow secured a $285 million class action settlement against the El Paso Corporation on behalf of the co-lead plaintiff, an individual. The case involved a securities fraud stemming from the company's inflated earnings statements, which cost shareholders hundreds of millions of dollars during a four-year span. Upon approving the settlement, the court commended the efficiency with which the case had been prosecuted, particularly in light of the complexity of the allegations and the legal issues.

In re Bear Stearns Cos., Inc. Securities, Derivative & ERISA Litigation

Labaton Keller Sucharow served as co-lead counsel, securing a $294.9 million settlement on behalf of lead plaintiff State of Michigan Retirement Systems and the class. The action alleged that Bear Stearns and certain officers and directors made misstatements and omissions in connection with Bear Stearns' financial condition, including losses in the value of its mortgage-backed assets and Bear Stearns' risk profile and liquidity. The action further claimed that Bear Stearns' outside auditor, Deloitte, made misstatements and omissions in connection with its audits of Bear Stearns' financial statements for

fiscal years 2006 and 2007. Our prosecution of this action required us to develop a detailed understanding of the arcane world of packaging and selling subprime mortgages. Our complaint was called a "tutorial" for plaintiffs and defendants alike in this fast-evolving area. After surviving motions to dismiss, the court granted final approval to settlements with the defendant Bear Stearns for $275 million and with Deloitte for $19.9 million.

In re Massey Energy Co. Securities Litigation

Labaton Keller Sucharow secured a $265 million all-cash settlement as co-lead counsel representing the Commonwealth of Massachusetts Pension Reserves Investment Trust in a case arising from one of the most notorious mining disasters in U.S. history. The settlement was reached with Alpha Natural Resources, Massey's parent company. Investors alleged that Massey falsely told investors it had embarked on safety improvement initiatives and presented a new corporate image following a deadly fire at one of its coalmines in 2006. After another devastating explosion, which killed 29 miners in 2010, Massey's market capitalization dropped by more than $3 billion.

In re The Estée Lauder Companies, Inc. Securities Litigation

Labaton Keller Sucharow secured a $210 million settlement serving as lead counsel in a securities class action against The Estée Lauder Companies, Inc. (Estée) representing lead plaintiffs Macomb County Employees' Retirement System, Macomb County Retiree Health Care Fund, and Wayne County Employees' Retirement System. The case alleged that Estée, a global leader in luxury cosmetics and skincare, and certain executives misled investors by touting strong revenue growth while concealing the company's heavy reliance on grey-market sales channels and the negative impacts of stricter regulations on resellers, which forced the company into steep discounts, leading to lower revenues and profit margins. The Firm achieved notable victories throughout the case, including overcoming Defendants' motion to dismiss.

Boston Retirement System v. Uber Technologies, Inc.

Labaton Keller Sucharow achieved a $200 million settlement serving as lead counsel representing Boston Retirement System in an action against Uber Technologies Inc. The case alleges that offering documents for Uber's May 2019 IPO misleadingly heralded a "new day at Uber" and that Uber had left its checkered history in the past, while failing to disclose material facts concerning Uber's global playbook for illegally launching and operating its ridesharing business, illegal misclassification of Uber drivers as independent contractors rather than employees, deficient safety policies and practices that led to sexual assaults and other abuses, slowing growth, and massive restructuring and layoffs planned for the weeks and months after the IPO. The Firm overcame several hurdles to reach a settlement, including defeating Defendants' motion to appeal class certification in the U.S. Court of Appeals for the Ninth Circuit and overcoming Defendants' request to block the depositions of 16 high-level Uber executives and members of the board of directors.

In re Fidelity National Information Services, Inc. Securities Litigation.

Labaton Keller Sucharow serves as Lead Counsel in a securities class action against Fidelity National Information Services, Inc. (FIS) and achieved a $210 million settlement (pending final court approval) on behalf of Lead Plaintiffs Nebraska Investment Council, North Carolina Retirement Systems, and North Carolina Supplemental Retirement Plans. The complaint alleges that FIS misled investors about the success of the company's $48 billion acquisition of Worldpay and FIS failed to write down the value of Worldpay's goodwill, despite allegedly knowing of several facts demonstrating that the asset was worth many billions less than publicly stated. The Firm achieved a significant victory early in the litigation by defeating a motion to dismiss, with the court specifically citing the strength of the Plaintiffs' allegations. With class certification pending and following d, the parties agreed to a $210 million settlement.

Eastwood Enterprises, LLC v. Farha (WellCare Securities Litigation)

Labaton Keller Sucharow served as co-lead counsel and secured a $200 million settlement on behalf of the New Mexico State Investment Council and the Public Employees Retirement Association of New Mexico over allegations that WellCare Health Plans, Inc., a Florida-based healthcare service provider, disguised its profitability by overcharging state Medicaid programs. Further, under the terms of the settlement approved by the court, WellCare agreed to pay an additional $25 million in cash if, at any time in the next three years, WellCare was acquired or otherwise experienced a change in control at a share price of $30 or more after adjustments for dilution or stock splits.

In re SCANA Corporation Securities Litigation

Labaton Keller Sucharow served as co-lead counsel and secured a $192.5 million settlement on behalf of the class and co-lead plaintiff West Virginia Investment Management Board in this matter against a regulated electric and natural gas public utility. When the case settled in 2019, it represented the largest securities fraud settlement in the history of the District of South Carolina. The action alleged that for a period of two years, the company and certain of its executives made a series of misstatements and omissions regarding the progress, schedule, costs, and oversight of a key nuclear reactor project in South Carolina. Labaton Keller Sucharow conducted an extensive investigation into the alleged fraud, including by interviewing 69 former SCANA employees and other individuals who worked on the nuclear project. In addition, Labaton Keller Sucharow obtained more than 1,500 documents from South Carolina regulatory agencies, SCANA's state-owned junior partner on the nuclear project, and a South Carolina newspaper, among others, pursuant to the South Carolina Freedom of Information Act (FOIA). This information ultimately provided the foundation for our amended complaint and was relied upon by the court extensively in its opinion denying defendants' motion dismiss.

In re Bristol-Myers Squibb Securities Litigation

Labaton Keller Sucharow served as lead counsel representing the lead plaintiff, union-owned LongView Collective Investment Fund of the Amalgamated Bank (LongView), against drug company Bristol-Myers Squibb (BMS). LongView claimed that the company's press release touting its new blood pressure medication, Vanlev, left out critical information— that undisclosed results from the clinical

trials indicated that Vanlev appeared to have life-threatening side effects. The Food and Drug Administration (FDA) expressed serious concerns about these side effects and BMS released a statement that it was withdrawing the drug's FDA application, resulting in the company's stock price falling and losing nearly 30 percent of its value in a single day. After a five-year battle, we won relief on two critical fronts. First, we secured a $185 million recovery for shareholders, and second, we negotiated major reforms to the company's drug development process that will have a significant impact on consumers and medical professionals across the globe. Due to our advocacy, BMS must now disclose the results of clinical studies on all of its drugs marketed in any country.

In re Fannie Mae 2008 Securities Litigation

Labaton Keller Sucharow secured a $170 million settlement as co-lead counsel on behalf of co-lead plaintiff Boston Retirement System. The lead plaintiffs alleged that Fannie Mae and certain of its current and former senior officers violated federal securities laws, by making false and misleading statements concerning the company's internal controls and risk management with respect to Alt-A and subprime mortgages. The lead plaintiffs also alleged that defendants made misstatements with respect to Fannie Mae's core capital, deferred tax assets, other-than-temporary losses, and loss reserves. Labaton Keller Sucharow successfully argued that investors' losses were caused by Fannie Mae's misrepresentations and poor risk management, rather than by the financial crisis. This settlement is a significant feat, particularly following the unfavorable result in a similar case involving investors in Fannie Mae's sibling company, Freddie Mac.

In re Broadcom Corp. Class Action Litigation

Labaton Keller Sucharow served as lead counsel on behalf of lead plaintiff New Mexico State Investment Council in a case stemming from Broadcom Corp.'s $2.2 billion restatement of its historic financial statements for 1998-2005. In 2010, the Firm achieved a $160.5 million settlement with Broadcom and two individual defendants to resolve this matter, representing the second largest up-front cash settlement ever recovered from a company accused of options backdating. Following a Ninth Circuit ruling confirming that outside auditors are subject to the same pleading standards as all other defendants, the district court denied the motion by Broadcom's auditor, Ernst & Young, to dismiss on the ground of loss causation. This ruling is a major victory for the class and a landmark decision by the court—the first of its kind in a case arising from stock-options backdating. In 2012, the court approved a $13 million settlement with Ernst & Young.

In re Satyam Computer Services Ltd. Securities Litigation

Satyam Computer Services Ltd. (Satyam), referred to as "India's Enron," engaged in one of the most egregious frauds on record. In a case that rivals the Enron and Bernie Madoff scandals, Labaton Keller Sucharow represented lead plaintiff, UK-based Mineworkers' Pension Scheme, which alleged that Satyam, related entities, Satyam's auditors, and certain directors and officers made materially false and misleading statements to the investing public about the company's earnings and assets, artificially

inflating the price of Satyam securities. Labaton Keller Sucharow achieved a $125 million settlement with Satyam and a $25.5 million settlement with the company's auditor, PricewaterhouseCoopers. .

Boston Retirement System v. Alexion Pharmaceuticals Inc

Serving as co-lead counsel representing Public Employee Retirement System of Idaho, Labaton Keller Sucharow achieved a $125 million settlement in a securities fraud case against Alexion Pharmaceuticals, Inc. and certain of its executives. The suit alleges that Alexion, a pharmaceutical drug company that generated nearly all of its revenue from selling the Company's flagship drug, Soliris, made materially false and misleading statements and omissions principally connected to Alexion's sales practices in connection with the marketing of Soliris.

In re Mercury Interactive Corp. Securities Litigation

Labaton Keller Sucharow served as co-lead counsel and secured a $117.5 million settlement on behalf of co-lead plaintiff Steamship Trade Association/International Longshoremen's Association Pension Fund. The plaintiffs alleged that Mercury Interactive Corp. (Mercury) backdated option grants used to compensate employees and officers of the company. Mercury's former CEO, CFO, and General Counsel actively participated in and benefited from the options backdating scheme, which came at the expense of the company's shareholders and the investing public.

In re CannTrust Holdings Inc. Securities Litigation

Labaton Keller Sucharow served as U.S. lead counsel on behalf of lead plaintiffs Granite Point Master Fund, LP; Granite Point Capital; and Scorpion Focused Ideas Fund in this action against CannTrust Holdings Inc., a cannabis company primarily traded on the Toronto Stock Exchange and the New York Stock Exchange, resulting in landmark settlements totaling CA$129.5 million. Class actions against the company commenced in both the U.S. and Canada, with the U.S. class action asserting that CannTrust made materially false and misleading statements and omissions concerning its compliance with relevant cannabis regulations and an alleged scheme to increase its cannabis production.

In re Oppenheimer Champion Fund Securities Fraud Class Actions and *In re Core Bond Fund*

Labaton Keller Sucharow served as lead counsel and represented individuals and the proposed class in two related securities class actions brought against Oppenheimer Funds, Inc., among others, and certain officers and trustees of two funds—Oppenheimer Core Bond Fund and Oppenheimer Champion Income Fund. The Firm achieved settlements amounting to $100 million: $52.5 million in *In re Oppenheimer Champion Fund Securities Fraud Class Actions* and a $47.5 million settlement in *In re Core Bond Fund*. The lawsuits alleged that the investment policies followed by the funds resulted in investor losses when the funds suffered drops in net asset value despite being presented as safe and conservative investments to consumers.

In re PG&E Corporation Securities Litigation

Labaton Keller Sucharow secured a $100 million settlement serving as Lead Counsel representing Public Employees Retirement Association of New Mexico in a securities class action against PG&E Corporation and Pacific Gas and Electric Company (together with PG&E Corporation, PG&E), and certain related officers, directors, and underwriters. The suit alleges that PG&E made false and misleading statements to investors about the company's progress, improvements, and regulatory compliance concerning wildfire safety protocols prior to the devastating Northern California wildfires in October 2017 (the North Bay Fires) and November 2018 (the Camp Fire). After PG&E filed for bankruptcy protection in 2019, the District Court stayed the action. Labaton continued to vigorously litigate the matter and secured notable victories, including ultimately overturning the stay in the Bankruptcy Court. Following two motions to dismiss, motion for class certification, and extensive mediation, the Parties reached an agreement to settle the action in December 2025.

In re Computer Sciences Corporation Securities Litigation

As lead counsel representing Ontario Teachers' Pension Plan Board, Labaton Keller Sucharow secured a $97.5 million settlement in this "rocket docket" case involving accounting fraud. The settlement was the third largest all-cash recovery in a securities class action in the Fourth Circuit and the second largest all-cash recovery in such a case in the Eastern District of Virginia. The plaintiffs alleged that IT consulting and outsourcing company, Computer Sciences Corporation (CSC), fraudulently inflated its stock price by misrepresenting and omitting the truth about the state of its most visible contract and its internal controls. In particular, the plaintiffs alleged that CSC assured the market that it was performing on a $5.4 billion contract with the UK National Health Service when CSC internally knew that it could not deliver on the contract, departed from the terms of the contract, and as a result, was not properly accounting for the contract.

In re Allstate Corporation Securities Litigation

Labaton Keller Sucharow achieved a $90 million settlement as lead counsel representing the Carpenters Pension Trust Fund for Northern California, the Carpenters Annuity Trust Fund for Northern California, and the City of Providence Employee Retirement Systemin a securities case against The Allstate Corporation and certain current and former executives. The suit alleged that Allstate implemented an aggressive growth strategy, including lowering the company's underwriting standards, in an effort to grow its auto insurance business. Defendants are accused of concealing the resulting increase in the number of claims filed by the company's auto insurance customers for several months, while the company's CEO sold $33 million in Allstate stock. The Firm vigorously litigated the case for more than five years, overcoming Allstate's motion to dismiss and winning class certification two times, following remand to the District Court by the Seventh Circuit Court of Appeals.

City of Warwick Retirement System v. Catalent, Inc.

Labaton Keller Sucharow reached a $78 million settlement on behalf of investors in Catalent, Inc. The Firm serves as Co-Lead Counsel representing Lead Plaintiff Public Employees' Retirement System of

Mississippi in a securities class action alleging that Catalent and certain executives engaged in a scheme to mislead Catalent investors about quality controls and operationality at certain Catalent manufacturing facilities and about the company's financial and accounting controls.

In re Nielsen Holdings PLC Securities Litigation

Labaton Keller Sucharow served as lead counsel representing Public Employees' Retirement System of Mississippi and secured a $73 million settlement in a securities class action against the data analytics company Nielsen Holdings PLC over allegations the company misrepresented the strength and resiliency of its business and the impact of the European Union's General Data Protection Regulation, commonly known as the GDPR.

City of Miami Fire Fighters and Police Officers Retirement Trust v. Okta, Inc.

Labaton Keller Sucharow achieved a $60 million settlement serving as lead counsel to Nebraska Investment Council and North Carolina Retirement Systems in a securities fraud case against Okta, Inc., the company's CEO Todd McKinnon, CFO and Executive Vice Chairman Brett Tighe, and COO and Co-Founder Frederic Kerrest. The case arises from Okta's acquisition of Auth0 in 2021 alleging Okta misled investors about the success of the post-acquisition integration with Auth0 by touting the benefits of the Auth0 integration for the Company; concealing the attrition of key senior Auth0 employees, along with key Okta employees, which caused severe problems for the integration; and concealing issues in the sales organization, such as Okta's difficulties selling products in Auth0's portfolio and vice versa.

Allison v. Oak Street Health Inc.

Labaton Keller Sucharow achieved a $60 million settlement serving as co-lead counsel to Boston Retirement Systems against Oak Street founder and CEO Michael Pykosz, Oak Street CFO Timothy Cook, two private equity firms and the subsidiaries in which they hold Oak Street stock, certain members of Oak Street's board of directors, and the underwriters for Oak Street's August 2020 IPO, December 2020 Secondary Public Offering (SPO), February 2021 SPO, and May 2021 SPO. The suit alleges that Oak Street Health, which focuses exclusively on patients that are Medicare eligible, failed to disclose that it used two forms of prohibited marketing tactics to attract new patients to sign up at its primary care centers.

In re Resideo Technologies Inc. Securities Litigation

Labaton Keller Sucharow served as co-lead counsel and secured a $55 million settlement on behalf of Naya Capital Management in an action alleging Resideo failed to disclose the negative effects of a spin-off on the company's product sales, supply chain, and gross margins, and misrepresented the strength of its financial forecasts.

Public Employees' Retirement System of Mississippi v. Endo Int'l plc

Labaton Keller Sucharow served as lead counsel in a securities class action against Endo Pharmaceuticals. The case settled for $50 million, the largest class settlement in connection with a

secondary public offering obtained in any court pursuant to the Securities Act of 1933. The action alleged that Endo failed to disclose adverse trends facing its generic drugs division in advance of a secondary public offering that raised $2 billion to finance the acquisition of Par Pharmaceuticals in 2015. The Firm overcame several procedural hurdles to reach this historic settlement, including successfully opposing defendants' attempts to remove the case to federal court and to dismiss the class complaint in state court.

Lilien v. Olaplex Holdings, Inc.

Labaton Keller Sucharow secured a $47.5 million settlement serving as Lead Counsel representing Lead Plaintiff Arkansas Teacher Retirement System in a securities class action against luxury hair care brand Olaplex Holdings, Inc. The action alleged that the offering documents filed in connection with Olaplex's 2021 IPO contained certain materially false and misleading statements.

Sinnathurai v. Novavax, Inc.

Labaton Keller Sucharow achieved a $47 million settlement serving as co-lead counsel in a securities class action against Novavax, Inc., a biotechnology company that focuses on the discovery, development, and commercialization of vaccines to prevent serious infectious diseases and address health needs, representing an individual. The company's product candidates include NVX-CoV2373, which was in development as a vaccine for COVID-19. Prior to the start of the Class Period, Novavax announced that it planned to complete Emergency Use Authorization (EUA) submissions for NVX-CoV2373 with the FDA in the second quarter of 2021. The suit alleges Novavax made false and/or misleading statements and/or failed to disclose that it overstated its manufacturing capabilities and downplayed manufacturing issues that would impact its approval timeline for NVX-CoV2373; as a result, Novavax was unlikely to meet its anticipated EUA regulatory timelines.

In re JELD-WEN Holding, Inc. Securities Litigation

Labaton Keller Sucharow was court-appointed co-lead counsel and represented Public Employees' Retirement System of Mississippi in a securities class action lawsuit against JELD-WEN Holding, Inc. and certain of its executives. The parties reached an agreement to settle the action for $40 million. The case is related to allegedly false and misleading statements and omissions concerning JELD-WEN's allegedly anticompetitive conduct and financial results in the doorskins and interior molded door markets and the merit of a lawsuit filed against JELD-WEN by an interior door manufacturer.

In re Opendoor Technologies Inc. Securities Litigation

Labaton Keller Sucharow served as Lead Counsel in a securities class action lawsuit against Opendoor Technologies Inc., securing a $39 million settlement representing Oakland County Employees' Retirement System, Oakland County Voluntary Employees' Beneficiary Association, and Indiana Public Retirement System. The complaint alleged that Opendoor and certain of its executives and underwriters made materially false and misleading statements and omissions with respect to Opendoor's proprietary AI-powered pricing algorithm and its ability to dynamically adjust to changing

market conditions, including in the Offering Documents issued in connection with Opendoor's December 2020 de-SPAC Merger and February 2021 Offering. The complaint further alleged that the price of Opendoor common stock trading on the NASDAQ and other U.S.-based trading platforms was artificially inflated as a result of Defendants' allegedly false and misleading statements and omissions and declined when the truth was allegedly revealed through a series of partial corrective disclosures.

City of Warren Police and Fire Retirement System v. World Wrestling Entertainment, Inc.

Labaton Keller Sucharow served as court-appointed lead counsel in a securities class action against World Wrestling Entertainment, Inc. (WWE), securing a $39 million settlement on behalf of lead plaintiff Firefighters Pension System of the City of Kansas City Missouri Trust. The action alleged WWE defrauded investors by making false and misleading statements in connection with certain of its key overseas businesses in the Middle East North Africa region. The lead plaintiff further alleged that the price of WWE publicly traded common stock was artificially inflated as a result of the company's allegedly false and misleading statements and omissions and that the price declined when the truth was allegedly revealed through a series of partial revelations.

In re Uniti Group Inc. Securities Litigation

Labaton Keller Sucharow served as co-lead counsel in a securities class action against Uniti Group Inc. and recovered $38.875 million. The action alleged misstatements and omissions concerning the validity and propriety of the April 24, 2015, REIT spin-off through which Uniti was formed and the master lease agreement Uniti entered into with Windstream Services with respect to telecommunications equipment. The court issued an order denying defendants' motion to dismiss in its entirety and denied defendants' motion for reconsideration of that ruling. In discovery, the Firm participated in dozens of depositions and reviewed millions of pages of documents.

Vazquez v. Masimo Corporation

Labaton Keller Sucharow reached a $33.75 million settlement serving as Lead Counsel in a securities class action against Masimo Corporation (Masimo or the Company) and certain executives (collectively, Defendants) representing Boston Retirement System, Central Pennsylvania Teamsters Pension Fund – Defined Benefit Plan, and Central Pennsylvania Teamsters Pension Fund – Retirement Income Plan. The action alleged that Defendants made false and misleading statements and omissions about the Company's healthcare business, Masimo's acquisition of the consumer audio firm Sound United, and the integration of the Sound United business. In November 2024, the Firm overcame Defendants' motion to dismiss in large part. Beginning in March 2025, the Parties engaged in formal discovery, with the Firm reviewing approximately 74,500 pages of documents, including approximately 40,000 pages of documents from ongoing, related litigations involving Defendants Masimo and Joseph Kiani. Fact discovery was ongoing when Defendants Masimo, Micah Young, Bilal Muhsin, and Eli Kammerman agreed to settle the matter.

In re Conduent Sec. Litigation

Labaton Keller Sucharow achieved a $32 million settlement in a securities class action against Conduent Inc., a company that specializes in providing infrastructure technology for its clients across multiple sectors, including E-ZPass Group. As part of the company's toll-collecting operations, Conduent offered a system that eliminated toll booths altogether, called all-electronic tolling or cashless tolling. The suit alleges that Conduent and its former CEO and former CFO falsely represented to investors that the company had addressed legacy IT issues it faced after its spin-off from Xerox. After extensive delays, Conduent finally started to migrate and consolidate its data centers without the necessary IT mapping resulting in severe network outages and service issues for multiple cashless tolling clients from several states including New York, Maryland, New Jersey, and Texas, which withheld revenue from or fined Conduent for its failure to meet its service requirements under its tolling contracts with those agencies.

In re Honest Company, Inc. Securities Litigation

Labaton Keller Sucharow secured a $27.5 million settlement serving as Lead Counsel in a securities class action against The Honest Company, Inc. alleging the company made numerous false and misleading statements regarding its financial prospectus in offering materials for the company's IPO. Specifically, Honest was accused of failing to disclose customers were experiencing issues with its leading diaper product, destocking and falling demand for COVID-19 products, and risks associated with Honest's customer acquisition and retention, and adverse economic conditions were already negatively impacting Honest's operating results at the time of the IPO. The Firm achieved significant victories throughout the case, including defeating two motions to dismiss and achieving class certification, with the court specifically citing the strength of the Plaintiffs' allegations.

Pension Trust Fund for Operating Engineers v. DeVry Education Group, Inc.

In a case that underscores the skill of our in-house investigative team, Labaton Keller Sucharow secured a $27.5 million recovery in an action alleging that DeVry Education Group, Inc. issued false statements to investors about employment and salary statistics for DeVry University graduates. The Firm took over as lead counsel after a consolidated class action complaint and an amended complaint were both dismissed. Labaton Keller Sucharow filed a third amended complaint, which included additional allegations based on internal documents obtained from government entities through FOIA and allegations from 13 new confidential witnesses who worked for DeVry. In denying defendants' motion to dismiss, the court concluded that the "additional allegations . . . alter[ed] the alleged picture with respect to scienter" and showed "with a degree of particularity . . . that the problems with DeVry's [representations] . . . were broad in scope and magnitude."

In re StoneCo Ltd. Securities Litigation.

Labaton Keller Sucharow served as Lead Counsel in a securities class action against StoneCo Ltd., securing a $26.75 million settlement on behalf of Lead Plaintiff Indiana Public Retirement System. The

action alleged that StoneCo, a provider of financial technology solutions primarily in Brazil, misled investors about its role in the failure of a merchant lending program it once offered in Brazil.

ODS Capital LLC v. JA Solar Holdings Co. Ltd.

In a hard-won victory for investors, Labaton Keller Sucharow secured a $21 million settlement in a securities class action against JA Solar Holdings Co. Ltd and certain of its executives on behalf of ODS Capital LLC. The litigation involved allegations that defendants made misstatements or omissions that artificially depressed the price of JA Solar securities in order to avoid paying a fair price during the company's take-private transaction. As court-appointed co-lead counsel, Labaton Keller Sucharow revived the suit in an August 2022 Second Circuit ruling, after a lower court initially granted JA Solar's dismissal bid.

In re Barclays PLC Securities Litigation

Labaton Keller Sucharow served as Lead Counsel in a securities class action against Barclays PLC and secured a $19.5 million settlement on behalf of Boston Retirement System. The actions alleged that Barclays and certain of its executives made false and misleading statements and omissions regarding the strength and efficacy of Barclays' internal controls over financial reporting following its loss of "well-known seasoned issuer" status in the United States and becoming an "ineligible issuer," artificially inflating the value of Barclays' American Depository Shares.

Vancouver Alumni Asset Holdings Inc. v. Daimler A.G.

Labaton Keller Sucharow served as lead counsel on behalf of Public School Retirement System of Kansas City, Missouri, and secured a $19 million settlement in a class action against automaker Daimler AG. The action arose out of Daimler's alleged misstatements and omissions touting its Mercedes-Benz diesel vehicles as "green" when independent tests showed that under normal driving conditions, the vehicles exceeded the nitrous oxide emissions levels set by U.S. and E.U. regulators. Defendants lodged two motions to dismiss the case. However, the Firm was able to overcome both challenges. The court then stayed the action after the U.S. DOJ intervened. The Firm worked with the DOJ and defendants to partially lift the stay in order to allow lead plaintiffs to seek limited discovery.

Avila v. LifeLock, Inc.

Labaton Keller Sucharow served as co-lead counsel and secured a $20 million settlement on behalf of Oklahoma Police Pension and Retirement System and Oklahoma Firefighters Pension and Retirement System in a securities class action against LifeLock. The action alleged that LifeLock misrepresented the capabilities of its identity theft alerts to investors. While LifeLock repeatedly touted the "proactive," "near real-time" nature of its alerts, the actual timeliness of such alerts to customers did not resemble a near real-time basis. After being dismissed by the Arizona District Court twice, the Firm was able to successfully appeal the case to the Ninth Circuit and secured a reversal of the District Court's dismissals. The case settled shortly after being remanded to the District Court.

In re Prothena Corporation PLC Securities Litigation

Labaton Keller Sucharow, as co-lead counsel, secured a $15.75 million recovery in a securities class action against development-stage biotechnology company, Prothena Corp. The action alleged that Prothena and certain of its senior executives misleadingly cited the results of an ongoing clinical study of NEOD001—a drug designed to treat amyloid light chain amyloidosis and one of Prothena's principal assets. Despite telling investors that early phases of testing were successful, defendants later revealed that the drug was "substantially less effective than a placebo." Upon this news, Prothena's stock price dropped nearly 70 percent.

In re Acuity Brands, Inc. Securities Litigation

Labaton Keller Sucharow secured a $15.75 million settlement as co-lead counsel representing Public Employees' Retirement System of Mississippi in a securities class action lawsuit against Acuity Brands, Inc., a leading provider of lighting solutions for commercial, institutional industrial, infrastructure, and residential applications throughout North America and select international markets. The suit alleged that Acuity misled investors about the impact of increased competition on its business, including its relationship with its largest retail customer, Home Depot. Despite defendants' efforts, the court denied their motion to dismiss in significant part and granted class certification, rejecting their arguments in full. Defendants appealed the class certification order to the Eleventh Circuit Court of Appeals, which the Firm vigorously opposed. Subsequently, the parties mediated and agreed on a settlement-in-principle, and the Eleventh Circuit stayed the appeal and removed the case from the docket.

Labaton Keller Sucharow

Awards and Accolades

Consistently Ranked as a Leading Firm:

Labaton Keller Sucharow was named a **2025 Securities Group of the Year** by *Law360*. This annual list highlights the practice groups behind the major litigation wins that have shaped the legal landscape.

Benchmark Litigation recognized Labaton Keller Sucharow both nationally and regionally, in **New York** and **Delaware**, in its 2026 edition and named 9 Partners as **National Securities Stars**, **Litigation Stars**, and **Future Stars** across the U.S. The Firm received top rankings in the **Securities** and **Dispute Resolution** categories. *Benchmark Litigation* also named the Firm a **"Top Plaintiffs Firm"** and the 2026 **"Plaintiff Firm of the Year."**

Labaton Keller Sucharow is recognized by *Chambers USA 2026* among the leading plaintiffs' firms in the nation, receiving a total of three practice group rankings and six partners ranked or recognized. *Chambers* notes that the Firm is **"well-respected"** and **"prominent player"** of the plaintiffs bar with an impressive team that **"demonstrates great judgment"** and has **"a great depth and breadth to handle any complex and sophisticated"** matter.

Labaton Keller Sucharow has been recognized as one of the **Nation's Best Plaintiffs' Firms** by *The Legal 500*. In 2026, the Firm earned a **Tier 1** ranking in **Securities Litigation** and in **M&A Litigation**. Eight Labaton Keller Sucharow attorneys were ranked or recommended in the guide, which notes the Firm as **"exceptional in every way," "very knowledgeable and experienced,"** and **"excellent at identifying the strongest claims in each case and aggressively prosecuting those claims without wasting time and resources on less strategically relevant issues."**

The National Law Journal "Elite Trial Lawyers" recognized Labaton Keller Sucharow as the **2026 Consumer Protection Firm of the Year** and **Talent Management Firm of the Year**. The awards recognize U.S. based law firms that have performed exemplary and cutting-edge work on behalf of plaintiffs.

Lawdragon recognized 18 Labaton Keller Sucharow attorneys among the **500 Leading Plaintiff Financial Lawyers** in the country in their 2026 guide. The guide recognizes attorneys that are **"the best in the nation—many would say the world—at representing plaintiffs."**

Six Labaton Keller Sucharow attorneys have been recognized by *The Best Lawyers in America*® 2026 Edition across four different categories. Labaton Keller Sucharow's attorneys received the recognition in the **Litigation – Securities**, **Corporate Governance Law**, **Mass Tort Litigation / Class Actions: Plaintiffs**, and **Mergers & Acquisitions Law** categories.

Labaton Keller Sucharow

Professional Profiles



Eric J. Belfi
Chairman

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Practice Areas:

- Securities Litigation
- Corporate Governance and Shareholder Rights Litigation
- Non-U.S. Securities Litigation

Bar Admissions:

- New York

Eric J. Belfi is Chairman of Labaton Keller Sucharow LLP, one of the leading plaintiffs' firms in the world. As Chairman and Head of the Firm's Executive Committee, Eric is responsible for establishing the Firm's strategic direction and driving business innovation, growth, and a culture of performance and collaboration. His commitment to these priorities has helped the Firm deepen its practice area expertise, expand its global reach, and earn industry recognition for its workplace culture.

An accomplished litigator and former prosecutor, Eric represents many of the largest and most influential institutional investors across the world. His practice is focused on complex securities and shareholder rights litigation, both in the United States and abroad. In addition to his litigation practice, Eric is Chair of the Firm's Client Development Group and plays a central role in the Case Evaluation Group, helping to identify and develop impactful matters on behalf of institutional investor clients.

Highly regarded by industry observers for his professional achievements, Eric has been recognized by *Chambers & Partners USA* as a "notable practitioner" and is recommended by *The Legal 500* for excellence in the field of securities litigation. In further recognition of his accomplishments as a leader of the plaintiffs bar, *Crain's New York Business* named him a "Notable Leader in Law." In addition, *Lawdragon* has consistently honored Eric as a top lawyer across multiple categories including global litigation and plaintiff financial, and *The National Law Journal's* "Elite Trial Lawyers" has shortlisted Eric for "Plaintiff Attorney of the Year."

A respected voice on legal and regulatory issues, Eric has been featured in *The Wall Street Journal*, *Bloomberg Law*, *Financial Times*, *Law360*, and *The National Law Journal*, among others.

Prior to joining the Firm, Eric served as an Assistant Attorney General for the State of New York, where he led complex white-collar investigations with a focus on securities law violations. Previously, he served as an Assistant District Attorney in Westchester County, where he prosecuted economic and environmental crimes.

Eric is an active member of several industry organizations, including the National Association of Public Pension Attorneys (NAPPA), the National Conference on Public Employee Retirement Systems (NCPERS), and the International Foundation of Employee Benefit Plans (IFEBP). He is a board member of the Christopher J. Keller Memorial Foundation, in addition to serving on the Corporate Advisory Board of Cold Spring Harbor Laboratory and as a leading advocate for the North Shore Land Alliance. Eric remains deeply engaged with St. John's University and plays a leading role in the Christopher J. Keller Memorial Scholarship Fund.

Eric earned his Juris Doctor from St. John's University School of Law and received his Bachelor of Arts from Georgetown University.



Jonathan Gardner

Managing Partner and Head of Litigation

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Practice Areas:

- Securities Litigation
- Alternative Dispute Resolution

Bar Admissions:

- New York

Jonathan Gardner serves as the Managing Partner of Labaton Keller Sucharow LLP and as a member of its Executive Committee. He is based in the Firm's New York office.

With more than 30 years of experience, Jonathan serves as the Firm's Head of Litigation, overseeing all litigation matters, including the prosecution of complex securities fraud cases on behalf of institutional investors. He has played a pivotal role in developing the Firm's groundbreaking Alternative Dispute Resolution (ADR) Practice in response to the increasing use of mandatory arbitration clauses in consumer contracts.

Recognized as a "Star" by *Benchmark Litigation* and praised by peers as "engaged and strategic," Jonathan has also been named an "MVP" by *Law360* for securing significant successes in high-stakes litigation and complex global matters. Ranked by *Chambers & Partners USA* for Securities Litigation, he is described as "an outstanding lawyer who knows how to get results," while *The Legal 500* highlights his ability to "understand the unique nature of complex securities litigation and strive for practical, results-driven outcomes." *Crain's New York Business* named Jonathan a "Notable Leader in Law," and *Lawdragon* highlighted him as one of the "Managing Partners You Need to Know." He is also recognized by *Lawdragon* among the top "Global Plaintiff Lawyers," "Leading Lawyers," "Leading Litigators in America," and "Leading Plaintiff Financial Lawyers." In addition, *New York Law Journal* selected Jonathan as a finalist for "Office Managing Partner of the Year" and the "Innovation" award.

Jonathan has played an integral role in securing some of the largest class action recoveries against corporate offenders since the global financial crisis. He oversaw the Firm's team in the investigation and prosecution of *Boston Retirement System v. Uber Technologies, Inc.*, which resulted in a $200 million recovery, and *In re Barrick Gold Securities Litigation*, which resulted in a $140 million recovery, among

other cases. He has also served as the lead attorney in numerous cases resulting in significant recoveries for injured class members, including *In re Hewlett-Packard Company Securities Litigation* ($57 million recovery); *Public Employees' Retirement System of Mississippi v. Endo International PLC (*$50 million recovery); *Medoff v. CVS Caremark Corporation* ($48 million recovery); *In re Nu Skin Enterprises, Inc., Securities Litigation* ($47 million recovery); *In re Intuitive Surgical Securities Litigation* ($42.5 million recovery); *In re Carter's Inc. Securities Litigation* ($23.3 million recovery against Carter's and certain officers, as well as its auditing firm PricewaterhouseCoopers); and *In re Aeropostale Inc. Securities Litigation* ($15 million recovery).

Jonathan has led the Firm's representation of investors in many high-profile cases including *Rubin v. MF Global Ltd*., which involved allegations of material misstatements and omissions in a Registration Statement and Prospectus issued in connection with MF Global's IPO. The case resulted in a recovery of $90 million for investors. Jonathan also represented lead plaintiff City of Edinburgh Council as Administering Authority of the Lothian Pension Fund in *In re Lehman Brothers Equity/Debt Securities Litigation*, which resulted in settlements exceeding $600 million against Lehman Brothers' former officers and directors, Lehman's former public accounting firm, as well as the banks that underwrote Lehman Brothers' offerings. In representing lead plaintiff Massachusetts Bricklayers and Masons Trust Funds in an action against Deutsche Bank, Jonathan secured a $32.5 million recovery for a class of investors injured by the bank's conduct in connection with certain residential mortgage-backed securities.

Jonathan has also been responsible for prosecuting several of the Firm's options backdating cases, including *In re Monster Worldwide, Inc. Securities Litigation* ($47.5 million settlement); *In re SafeNet, Inc. Securities Litigation* ($25 million settlement); *In re Semtech Securities Litigation* ($20 million settlement); and *In re MRV Communications, Inc. Securities Litigation* ($10 million settlement). He also was instrumental in *In re Mercury Interactive Corp. Securities Litigation*, which settled for $117.5 million, one of the largest settlements or judgments in a securities fraud litigation based on options backdating. Jonathan also represented the Successor Liquidating Trustee of Lipper Convertibles, a convertible bond hedge fund, in actions against the fund's former independent auditor and a member of the fund's general partner as well as numerous former limited partners who received excess distributions. He successfully recovered over $5.2 million for the Successor Liquidating Trustee from the limited partners and $29.9 million from the former auditor.

Jonathan is a board member of the Christopher J. Keller Memorial Foundation. He is also a member of the Federal Bar Council, New York State Bar Association, and Association of the Bar of the City of New York.

Jonathan earned his Juris Doctor from St. John's University School of Law. He received his bachelor's degree from American University.



Michael P. Canty
Partner and General Counsel

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Practice Areas:

- Securities Litigation
- Consumer Protection and Data Privacy Litigation

Bar Admissions:

- New York

Michael P. Canty is a Partner in the New York office of Labaton Keller Sucharow LLP, where he serves on the Firm's Executive Committee and as its General Counsel. In addition, he leads one of the Firm's Securities Litigation teams and is Co-Chair of the Firm's Consumer Protection and Data Privacy Litigation Practice.

Highly regarded as one of the country's elite litigators, Michael is consistently ranked for excellence in securities and consumer protection litigation by *Chambers & Partners USA*, *The Legal 500*, *Benchmark Litigation*, *Law360*, and *Lawdragon*. He has been named a "Titan of the Plaintiffs Bar" by *Law360* and has been repeatedly recognized as a "Trailblazer" by *The National Law Journal* and the *New York Law Journal* for his impact on the practice and business of law. In addition, *Crain's New York Business* selected Michael to its list of "Notable Litigators and Trial Attorneys," and the *Daily Journal* recognized him as a "Leading Commercial Litigator."

Michael has successfully prosecuted a number of high-profile securities matters on behalf of institutional investors, including *In re Fidelity National Information Securities Litigation* ($210 million settlement, pending final court approval), *In re The Estée Lauder Companies, Inc. Securities Litigation* ($210 million settlement), *Boston Retirement System v. Alexion Pharmaceuticals Inc.* ($125 million settlement), *In re PG&E Corporation Securities Litigation* ($100 million settlement), *In re The Allstate Corporation Securities Litigation* ($90 million settlement), *In re Okta, Inc. Securities Litigation* ($60 million settlement), *Sinnathurai v. Novavax, Inc.* ($47 million settlement), and *In re Opendoor Technologies Inc. Securities Litigation* ($39 million settlement), as well as matters involving Advanced Micro Devices, Camping World Holdings, and Credit Acceptance Corp, among others. Michael is actively leading the litigation of prominent cases against ZoomInfo, Roblox, Regeneron Pharmaceuticals, and Lockheed Martin, among others.

In addition to his securities practice, Michael has a leading consumer data privacy litigation practice. Most notably, he co-led the team that secured a historic jury verdict in the landmark data privacy case *Frasco v. Flo Health*, finding Meta liable for its role in the unauthorized collection and commercial use of highly personal health data from third-party app Flo Health. This is one of the first cases where a jury has held a major technology company accountable for its handling of consumer health information.

Michael also achieved the historic $650 million settlement in the *In re Facebook Biometric Information Privacy Litigation* matter—one of the largest consumer data privacy settlements ever and one of the first cases asserting consumers' biometric privacy rights under Illinois' Biometric Information Privacy Act (BIPA). He currently serves as co-lead counsel in *Garner v. Amazon.com, Inc.*, alleging Amazon's illegal wiretapping and surreptitious recording through its Alexa-enabled devices.

Prior to joining the Firm, Michael served as an Assistant U.S. Attorney in the U.S. Attorney's Office for the Eastern District of New York, where he was the Deputy Chief of the Office's General Crimes Section. During his time as a federal prosecutor, Michael also served in the Office's National Security and Cybercrimes Section. Previously, he served as an Assistant District Attorney for the Nassau County District Attorney's Office, where he handled complex state criminal offenses and served in the Office's Homicide Unit.

Michael has extensive trial experience both from his days as a prosecutor in New York City for the U.S. Department of Justice and as a Nassau County Assistant District Attorney. He served as trial counsel in more than 35 matters, many of which related to violent crime, white-collar, and terrorism-related offenses. He played a pivotal role in *United States v. Abid Naseer*, where he prosecuted and convicted an al-Qaeda operative who conspired to carry out attacks in the United States and Europe. Michael also led the investigation in *United States v. Marcos Alonso Zea*, a case in which he successfully prosecuted a citizen for attempting to join a terrorist organization in the Arabian Peninsula and for providing material support for planned attacks.

Before becoming a prosecutor, Michael worked as a Congressional Staff Member for the U.S. House of Representatives. He primarily served as a liaison between the Majority Leader's Office and the Government Reform and Oversight Committee. During his time with the House of Representatives, Michael managed congressional oversight of the United States Postal Service and reviewed and analyzed counter-narcotics legislation as it related to national security matters.

Michael is a frequent commentator on legal and regulatory developments and has been featured in *The Washington Post*, *Law360*, and *The National Law Journal*, among others, and has appeared on CBS and NPR.

He is a board member of the Christopher J. Keller Memorial Foundation and a member of the Federal Bar Council American Inn of Court, which endeavors to create a community of lawyers and jurists and promotes the ideals of professionalism, mentoring, ethics, and legal skills. He serves on the National Conference on Public Employee Retirement Systems (NCPERS) Securities Litigation Committee and is

also a member of the National Association of Public Pension Attorneys (NAPPA) and the Canadian Pension & Benefits Institute (CPBI).

Michael earned his Juris Doctor, *cum laude*, from St. John's University's School of Law. He received his Bachelor of Arts, *cum laude*, from Mary Washington College.



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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

James T. Christie is a Partner in the New York office of Labaton Keller Sucharow LLP. James focuses his practice on prosecuting complex securities fraud cases on behalf of institutional investors. He is currently involved in litigating cases against major U.S. and non-U.S. corporations, including ZoomInfo, Roblox, Lockheed Martin, and Regeneron Pharmaceuticals, among others.

James is a member of the Firm's Executive Committee and also serves as Assistant General Counsel, in addition to being Co-Chair of the Technology Committee and Co-Chair of the Artificial Intelligence Committee.

Seen as an elite litigator, James is recommended by *The Legal 500* and has been selected to *Benchmark Litigation's* "40 & Under List." His achievements in securities litigation have also earned him recognition from *The National Law Journal* as a "Rising Star of the Plaintiffs Bar" and from *Law360* as a "Securities Rising Star," which noted his leadership in several high-profile matters. In addition, James has been consistently ranked as a "Leading Plaintiff Financial Lawyer" and "Next Generation Lawyer" by *Lawdragon* and *The Best Lawyers in America*® listed him as one of the "Best Lawyers in America: Ones to Watch" in the Litigation: Securities category.

James has played an instrumental role in securing landmark recoveries for investors, including: $210 million in *In re Fidelity National Information Securities Litigation* (pending final court approval), $210 million in *In re The Estée Lauder Companies, Inc. Securities Litigation*, $192.5 million in *In re SCANA Corporation Securities Litigation,* $125 million in *Boston Retirement System v. Alexion Pharmaceuticals, Inc.,* $60 million in *In re Okta, Inc. Securities Litigation*, $47 million in *Sinnathurai v. Novavax, Inc.*, $40 million in *In re Jeld-Wen Holding, Inc. Securities Litigation*, $39 million in *In re Opendoor Technologies Inc. Securities Litigation*, $20 million in *Avila v. LifeLock, Inc.*, and $14.75 million in *In re PTC Therapeutics, Inc. Securities Litigation*, among others. James was also a crucial part of a cross-border

effort in *In re Canntrust Holdings Securities Litigation* that obtained a landmark CA$129.5 million settlement against a Canadian cannabis producer and its executive officers.

James previously served as a Judicial Intern in the U.S. District Court for the Eastern District of New York under the Honorable Sandra J. Feuerstein.

He is an active member of the American Bar Association, the Federal Bar Council, and the Georgia Association of Public Pension Trustees (GAPPT), where he serves on the Rules Committee.

James earned his Juris Doctor from St. John's University School of Law, where he was the Senior Articles Editor of the *St. John's Law Review*. He received his Bachelor of Science, *cum laude*, from St. John's University Tobin College of Business.



Francis P. McConville
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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Francis P. McConville is a Partner in the New York office of Labaton Keller Sucharow LLP and a member of the Firm's Executive Committee. He focuses on prosecuting complex securities fraud cases on behalf of institutional investor clients. As Chair of the Firm's Case Evaluation Group, Francis leads the identification, investigation, and development of potential actions to recover investment losses caused by violations of the federal securities laws and to vindicate shareholder rights in response to corporate and fiduciary misconduct.

Francis has been named a "Rising Star" in securities litigation by *Law360* and *The National Law Journal's* "Elite Trial Lawyers." *The Best Lawyers in America*® named him among the "Ones to Watch" in the Securities Litigation category and *Lawdragon* has recognized him as one of the country's "Leading Plaintiff Financial Lawyers" and "Next Generation Lawyers." *Benchmark Litigation* also recognized him as a "Future Star" and named him to their "40 & Under List."

Francis has played a key role in filing several matters on behalf of the Firm, including *In re Fidelity National Information Services, Inc. Securities Litigation* ($210 million settlement, pending final court approval); *In re The Estée Lauder Companies, Inc. Securities Litigation* ($210 million settlement); *Boston Retirement System v. Uber Technologies, Inc.* ($200 million settlement); *In re SCANA Securities Litigation* ($192.5 million settlement); *Boston Retirement System v. Alexion Pharmaceuticals, Inc.* ($125 million settlement); *In re PG&E Corporation Securities Litigation* ($100 million settlement); *In re Nielsen Holdings PLC Securities Litigation* ($73 million settlement); *In re KinderCare Learning Companies, Inc. Securities Litigation*; *In re Boston Scientific Corporation Securities Litigation*; and *In re Merck & Co., Inc. Securities Litigation*, among others.

Prior to joining Labaton Keller Sucharow, Francis was a Litigation Associate at a national law firm primarily focused on securities and consumer class action litigation. Francis has represented institutional and individual clients in federal and state courts across the country in class action securities litigation and shareholder disputes, along with a variety of commercial litigation matters. He assisted in the prosecution of several matters, including *Kiken v. Lumber Liquidators Holdings, Inc.* ($42 million recovery); *Hayes v. MagnaChip Semiconductor Corp.* ($23.5 million recovery); and *In re Galena Biopharma, Inc. Securities Litigation* ($20 million recovery).

Francis is an active member of the National Association of Public Pension Attorneys (NAPPA). He has served on *Law360*'s Securities Editorial Advisory Board.

Francis received his Juris Doctor, *magna cum laude*, from New York Law School where he was named a John Marshall Harlan Scholar and received a Public Service Certificate. Francis served as Associate Managing Editor of the *New York Law School Law Review* and worked in the Urban Law Clinic. He earned his Bachelor of Arts degree from the University of Notre Dame.



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Practice Areas:

- Securities Litigation
- Consumer Protection and Data Privacy Litigation

Bar Admissions:

- New York

Carol C. Villegas is a Partner in the New York office of Labaton Keller Sucharow LLP. Carol focuses on prosecuting complex securities fraud and consumer cases on behalf of institutional investors and individuals. Leading one of the Firm's Securities Litigation teams and as Co-Chair of the Firm's Consumer Protection and Data Privacy Practice, she is actively overseeing litigation against Microsoft, Boston Scientific, Merck, Charter Communications, PowerSchool, and General Motors, among others.

In addition to her litigation responsibilities, Carol holds a variety of leadership positions within the Firm, including serving on the Firm's Executive Committee, as Chair of the Women's Initiative, Co-Chair of the Corporate Accountability & Governance Task Force, and as Chief of Compliance. She is also a member of the Artificial Intelligence Committee.

Carol's development of innovative case theories in complex cases, her skillful handling of discovery work, and her adept ability during oral arguments has earned her accolades as one of the "top Securities Litigators" in the country from *Chambers & Partners USA* and *The Legal 500*, which hails her as "attentive, professional, and responsive" and highlights clients praise for helping them "better understand the process and how to value a case." She has been named "Plaintiff Litigator of the Year" by *Benchmark Litigation*. Carol has also been recognized by *Law360* as a "Class Action MVP," *The National Law Journal* as a "Plaintiffs' Trailblazer," *Forbes* as one of "America's Top Women Lawyers," and the *New York Law Journal* as a "Top Woman in Law," "New York Trailblazer," and "Distinguished Leader." *Business Today* named Carol one of the "Top 10 Most Influential Securities Litigation Lawyers in New York." *The National Law Journal*'s "Elite Trial Lawyers" has repeatedly recognized her superb ability to excel in high stakes matters on behalf of plaintiffs and selected her to its class of "Elite Women of the Plaintiffs Bar" and as a finalist for "Plaintiff Attorney of the Year." *Benchmark Litigation* has

recognized her as a "Litigation Star" and among the "Top 250 Women in Litigation." *Lawdragon* has recognized her as a top lawyer across multiple categories including litigation, plaintiff financial, and consumer. Additionally, *Crain's New York Business* selected Carol to its lists of "Notable Women in Law" and "Notable Litigators and Trial Attorneys." The *Women in Business Law Awards* has named Carol "Securities Litigator of the Year," "Privacy & Data Protection Lawyer of the Year," and "Thought Leader of the Year," in addition to awarding her the prestigious "Outstanding Achievement Award." *Chambers & Partners USA* selected Carol as a finalist for "Diversity & Inclusion: Outstanding Contribution" and *New York Law Journal*'s New York Legal Awards selected her as a "Lawyer of the Year" and "Best Mentor" finalist.

Notable recent successes in securities cases include *City of Warwick Retirement System v. Catalent, Inc.* ($78 million settlement), *In re Nielsen Holdings PLC Securities Litigation* ($73 million settlement), *Allison v. Oak Street Health Inc.* ($60 million settlement), and *City of Warren Police and Fire Retirement System v. World Wrestling Entertainment, Inc.* ($39 million settlement). Carol has also played a pivotal role in securing favorable settlements for investors, including in cases against DeVry, a for-profit university; AMD, a multi-national semiconductor company; Liquidity Services, an online auction marketplace; Aeropostale, a leader in the international retail apparel industry; Vocera, a healthcare communications provider; and Prothena, a biopharmaceutical company, among others. Carol has also helped revive a securities class action against LifeLock after arguing an appeal before the Ninth Circuit. The case settled shortly thereafter.

In addition to her securities practice, Carol has extensive experience representing consumers in high-profile data privacy litigation. Most notably, Carol secured a historic jury verdict in a landmark data privacy case against tech giant Meta Platforms Inc., finding Meta liable for its role in the unauthorized collection and commercial use of highly personal health data from third-party app Flo Health. This is one of the first cases where a jury has held a major technology company accountable for its handling of consumer health information.

Prior to joining Labaton Keller Sucharow, Carol served as the Assistant District Attorney in the Supreme Court Bureau for the Richmond County District Attorney's office, where she took several cases to trial. She began her career as an Associate at King & Spalding LLP, where she worked as a federal litigator.

Carol is an active member of the New York State Bar Association's Women in the Law Section and Chair of the Board of Directors of the City Bar Fund, the nonprofit 501(c)(3) arm of the New York City Bar Association. In 2024, she was appointed by the Court of Appeals to the New York State Board of Law Examiners, an organization that administers the bar examination to candidates seeking admission to practice law in the State of New York. Carol is also a board member of the Christopher J. Keller Memorial Foundation and a member of the Swedish Investment Fund Association (SIFA), the National Association of Public Pension Attorneys (NAPPA), the National Council on Teacher Retirement (NCTR), the National Association of Women Lawyers, and the Hispanic National Bar Association. In addition, Carol previously served on *Law360*'s Securities Editorial Board.

Carol is a frequent commentator on legal issues and has been featured in the *Financial Times, Law360, Investment & Pensions Europe, and National Law Journal*, among others.

Carol earned her Juris Doctor from New York University School of Law, where she was the recipient of The Irving H. Jurow Achievement Award for the Study of Law and received the Association of the Bar of the City of New York Diversity Fellowship. She received her bachelor's degree, with honors, from New York University.

She is fluent in Spanish.



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Practice Areas:

- Securities Litigation
- Consumer Protection and Data Privacy Litigation

Bar Admissions:

- New York

Jake Bissell-Linsk is a Partner in the New York office of Labaton Keller Sucharow LLP. Jake focuses his practice on prosecuting complex securities fraud and consumer cases on behalf of institutional investors and individuals. He is Co-Chair of the Firm's Artificial Intelligence Committee.

Jake is widely recognized for his achievements in securities and data privacy litigation. *Benchmark Litigation* selected him to its "40 & Under List," which highlights the "best and brightest litigators across the U.S.," and he has been consistently recognized as a leading plaintiff lawyer by *Lawdragon*. In addition, Jake has been named among the "Best Lawyers in America: Ones to Watch" by the *Best Lawyers in America*®. Earlier in his career, he was honored as a "Rising Star" by industry leading publications, including *The National Law Journal's* "Elite Trial Lawyers," *New York Law Journal*, and *Law360*.

Jake has litigated federal securities class actions in jurisdictions across the country at both the District Court and Appellate Court level. He is currently litigating cases against General Motors and Cruise, alleging executives misrepresented the safety and capabilities of their autonomous driving technologies, and against Boeing alleging the company misstated its safety practices.

Jake has played a pivotal role in securing favorable settlements for investors in a variety of securities actions, including in matters against Nielsen ($73 million settlement), a case that involved allegations of inflated goodwill and the effect of the EU's GDPR on the company; Oak Street Health ($60 million settlement), a case involving allegations that it used two forms of prohibited marketing tactics to attract Medicare-eligible patients to sign up at its primary care centers; and Qihoo ($29.75 million settlement) and JA Solar ($21 million settlement), cases alleging misrepresentations about projections and post-merger plans included in proxies prior to a management buyout.

Beyond securities cases, Jake has played an integral role in consumer protection and data privacy litigation matters. Most notably, he was a key member of the team that secured the historic jury verdict in a landmark data privacy case against tech giant Meta Platforms Inc., finding Meta liable for its role in the unauthorized collection and commercial use of highly personal health data from third-party app Flo Health. This is one of the first cases where a jury has held a major technology company accountable for its handling of consumer health information.

Jake was previously a Litigation Associate at a multinational corporate law firm, where he worked on complex commercial litigation including derivative suits and securities claims. He also assisted defendants in government investigations and provided litigation advice on M&A transactions and during restructurings. While in law school, Jake interned for Judge Melvin L. Schweitzer at the New York Supreme Court (Commercial Division).

Jake earned his Juris Doctor, *magna cum laude*, from the University of Pennsylvania Law School, where he served as Senior Editor of the *University of Pennsylvania Law Review* and as Associate Editor of the *East Asia Law Review*. He received his bachelor's degree, *magna cum laude*, from Hamline University.



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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York
- Massachusetts

Garrett J. Bradley is a Partner in the New York office of Labaton Keller Sucharow LLP. Garrett has decades of experience helping institutional investors, public pension funds, and individual investors recover losses attributable to corporate fraud. A former state prosecutor, Garrett has been involved in hundreds of securities fraud class action lawsuits that have, in aggregate, recouped hundreds of millions of dollars for investors. Garrett's past and present clients include some of the country's largest public pension funds and institutional investors.

Highly regarded as an accomplished litigator, Garrett was selected as one of New England's "Top Rated Lawyers" by *ALM Media* and *Martindale-Hubbell* and among the "Top 100 Trial Lawyers in Massachusetts" by *The American Trial Lawyers Association*. In addition, the Massachusetts Academy of Trial Attorneys and the Massachusetts Bar Association selected Garrett as "Legislator of the Year."

Prior to joining the Firm, Garrett worked as an Assistant District Attorney in the Plymouth County District Attorney's office. He also served in the Massachusetts House of Representatives for 16 years, where he represented the Third Plymouth District.

Garrett is a Fellow of the Litigation Counsel of America, an invitation-only society of trial lawyers comprised of less than 0.5% of American lawyers. He is also a member of the International Foundation of Employee Benefit Plans (IFEBP), The Public Justice Foundation, and the Million Dollar Advocates Forum.

Garrett earned his Juris Doctor from Boston College Law School and his Bachelor of Arts from Boston College.



Guillaume Buell
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Practice Areas:

- Securities Litigation
- Corporate Governance and Shareholder Rights Litigation
- Non-U.S. Securities Litigation

Bar Admissions:

- New York
- Massachusetts
- Texas
- Supreme Court of the United States

Guillaume Buell is a Partner in the New York and London offices at Labaton Keller Sucharow LLP. He is an experienced and trusted advisor to a wide range of institutional investors in the United States, the United Kingdom, Canada, and Europe regarding global securities litigation, corporate governance matters, and shareholder rights. His clients include a wide range of pension funds, asset managers, insurance companies, and other sophisticated investors. As part of the Firm's Non-U.S. Securities Litigation Practice, which is one of the first of its kind, Guillaume serves as liaison counsel to institutional investors in select overseas matters. He also advises clients on complex consumer matters.

Guillaume's achievements have earned him recognition as a "Future Star" and among the top "40 & Under" litigators by *Benchmark Litigation*. In addition, *Lawdragon*, named him a "Next Generation Lawyer" and among the "500 Global Plaintiff Lawyers."

Guillaume has played an important role in cases against The Estée Lauder Companies, Inc., CVS Caremark, Uniti Group, Nu Skin Enterprises, Conduent, Stamps.com, Genworth Financial, Rent-A-Center, and Castlight Health, among others.

Prior to joining the Firm, Guillaume was an attorney at a prominent defense firm in New York and a boutique litigation firm in Houston, where he provided legal counsel to a wide range of Fortune 500 and other corporate clients in the aviation, construction, energy, financial, consumer, pharmaceutical, and insurance sectors in state and federal litigations, government investigations, and internal investigations. While in law school, Guillaume was a Judicial Intern with the Honorable Loretta A. Preska, United States District Court for the Southern District of New York, and an Intern with the Government Bureau of the Attorney General of Massachusetts.

Guillaume is an active member of the National Association of Public Pension Attorneys (NAPPA), where he serves as an appointed member of its Securities Litigation Committee, Fiduciary & Governance Committee, and the New Member Education Committee. In addition, he is actively involved with the International Foundation of Employee Benefit Plans (IFEBP), the National Conference on Public Employee Retirement Systems (NCPERS), the Florida Public Pension Trustees Association (FPPTA), the Michigan Association of Public Employee Retirement Systems (MAPERS), the Association of Canadian Pension Management (ACPM), and the Canadian Pension & Benefits Institute (CPBI).

Guillaume received his Juris Doctor from Boston College Law School, where he was the recipient of the Boston College Law School award for outstanding contributions to the law school community. He was also a member of the National Environmental Law Moot Court Team, which advanced to the national quarterfinals and received recognition for best oralists. He received his Bachelor of Arts, *cum laude* with departmental honors, from Brandeis University.

Guillaume is fluent in French and conversant in German. He is an Eagle Scout and actively involved in his hometown's local civic organizations.



Joseph N. Cotilletta
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Practice Areas:

- Corporate Governance and Shareholder Rights
- Securities Litigation

Bar Admissions:

- New York
- New Jersey

Joseph N. Cotilletta is a Partner in the New York office of Labaton Keller Sucharow LLP, where he prosecutes complex securities fraud cases on behalf of institutional and individual investors. He also represents investors in corporate governance and transactional matters, including class action and derivative litigation.

Joe has repeatedly been recognized as a "Top 40 Under 40" civil trial lawyer by *The National Trial Lawyers.* He has also been recognized as a “Rising Star of the Plaintiffs Bar” by *The National Law Journal* "Elite Trial Lawyers" and as a “Next Generation Lawyer” by *Lawdragon*.

Since joining the Firm, Joe has achieved extraordinary results for investors. He was a senior member of the litigation team that achieved a $200 million recovery in *Boston Retirement Systems v. Uber Technologies, Inc.*— a case that alleged Uber’s $8.1 billion IPO offering documents misrepresented the company’s business model, growth strategy, passenger safety efforts, and financial condition. The settlement was the fourth largest securities class action settlement in 2024.

Additionally, Joe was part of the team that secured a $1 billion settlement in *In re Dell Technologies Inc. Class V Stockholders Litigation*. The settlement currently stands as the largest shareholder settlement ever in any state court in America and the 17th largest shareholder settlement of all time in federal and state court.

Prior to joining the Firm, Joe was a senior associate at a prominent national law firm, where he gained substantial trial and litigation experience pursuing high-value cases in various jurisdictions throughout the United States. Joe helped obtain multi-million-dollar recoveries from some of the largest companies in the world and set legal precedent in multiple areas of the law. Since the start of his legal career, Joe has dedicated himself to becoming a skilled advocate, sharpening his litigation expertise

while trying numerous cases as first or second chair and taking and defending hundreds of depositions. While in law school, he served as an extern for the Honorable Kim R. Gibson of the Western District of Pennsylvania.

Joe is a member of the Commercial and Federal Litigation Section as well as the Securities Litigation Committee of the New York State Bar Association.

Joe earned his Juris Doctor from Penn State Law, where he was selected to join the Order of Barristers and served as an Articles Editor for the *Penn State International Law Review*, in addition to serving on the Executive Board of the school's Moot Court. Joe received his Bachelor of Science in Business Administration from Bryant University, where he was captain of the Men's Lacrosse team that advanced to the program's first semi-finals playoff appearance.

He is conversant in Italian.



Alfred L. Fatale III
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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Alfred L. Fatale III is a Partner in the New York office of Labaton Keller Sucharow LLP. Leading one of the Firm's Securities Litigation teams, he is actively overseeing litigation against PACS Group, Inc., Concho Resources, Norfolk Southern Corporation, Rent the Runway, ON24, and PDD Holdings, Inc. among others.

Alfred's success in moving the needle in the legal industry has earned him industry wide recognition. He has been recognized as a top securities litigator by *Chambers & Partners USA*, a securities "MVP" by *Law360*, and a "trailblazer" by *The National Law Journal* and *The American Lawyer*. In addition, *Benchmark Litigation* selected Alfred as a "Future Star" and named him to its prestigious "40 & Under" list, and *Business Today* named him one of the "Top 10 Most Influential Securities Litigation Lawyers in New York." Alfred has also been recognized by *The Best Lawyers in America*® as one of the "Best Lawyers in America: Ones to Watch" in the Litigation: Securities category, and he has been consistently ranked as a leading plaintiff financial lawyer by *Lawdragon*.

Alfred led the team that secured a $200 million recovery in *Boston Retirement System v. Uber Technologies, Inc.,* a case that alleged Uber's $8.1 billion IPO offering documents misrepresented the company's business model, growth strategy, passenger safety efforts, and financial condition.

In addition, Alfred represents individual and institutional investors in cases related to the protection of the financial markets and public securities offerings in trial and appellate courts throughout the country. In particular, he is leading the Firm's efforts to litigate securities claims in state courts following the U.S. Supreme Court's decision in *Cyan, Inc. v. Beaver County Employees Retirement Fund* while also overseeing litigation of several cases in federal courts.

Since joining the Firm in 2016, Alfred has led the investigation and prosecution of successful cases such as *In re ADT Inc. Securities Litigation*, resulting in a $30 million recovery; *In re Honest Company, Inc. Securities Litigation*, resulting in a $28 million recovery; *In re BrightView Holdings, Inc. Securities Litigation*, resulting in a $11.5 million recovery; *John Ford, Trustee of the John Ford Trust v. UGI Corporation*, resulting in a $10.25 million recovery; *Plymouth County Retirement Association v. Spectrum Brands Holdings Inc.*, resulting in a $9 million recovery; *In re SciPlay Corp. Securities Litigation*, resulting in an $8.275 million recovery; and *In re Livent Corp. Securities Litigation*, resulting in a $7.4 million recovery.

Prior to joining the Firm, Alfred was an Associate at a prominent defense firm, where he advised and represented financial institutions, investors, officers, and directors in a broad range of complex disputes and litigations including cases involving violations of federal securities law and business torts. Previously, Alfred served as a Judicial Extern under the Honorable Robert C. Mulvey.

Alfred is an active member of the American Bar Association and the New York City Bar Association.

Alfred earned his Juris Doctor from Cornell Law School, where he was a member of the *Cornell Law Review* as well as the Moot Court Board. He received his bachelor's degree, *summa cum laude*, from Montclair State University.



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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Christine M. Fox is a Partner in the New York office of Labaton Keller Sucharow LLP. With more than 25 years of securities litigation experience, Christine prosecutes complex securities fraud cases on behalf of institutional investors. In addition to her litigation responsibilities, Christine serves as the Chair of the Firm's Diversity Committee and Pro Bono Committee and is a member of the Firm's Investigations Committee.

Regarded as an accomplished litigator, *The National Law Journal's* "Elite Trial Lawyers" has selected Christine to its class of Elite Women of the Plaintiffs Bar, and *Crain's New York Business* named her to its list of "Notable Women in Law." In addition, Christine has been consistently recognized as a leading plaintiff financial lawyer by *Lawdragon*.

Christine is actively involved in litigating matters against Boeing, Charter Communications, Merck, Stride, West Pharmaceutical Services, and Boston Scientific, among others. She has played a pivotal role in securing favorable settlements for investors in class actions against Barrick Gold Corporation, one of the largest gold mining companies in the world ($140 million recovery); Catalent, a multinational pharmaceutical manufacturer ($78 million recovery); Nielsen, a data analytics company that provides clients with information about consumer preferences ($73 million recovery); Oak Street Health, a primary care center operator that focuses exclusively on Medicare-eligible patients ($60 million recovery); Nu Skin Enterprises, a multilevel marketing company ($47 million recovery); Intuitive Surgical, a manufacturer of robotic-assisted technologies for surgery ($42.5 million recovery); and World Wrestling Entertainment, a media and entertainment company ($39 million recovery).

Christine is actively involved in several pro bono immigration cases at the Firm.

Prior to joining the Firm, Christine worked at a national litigation firm focusing on securities, antitrust, and consumer litigation in state and federal courts. She played a significant role in securing class action recoveries in a number of high-profile securities cases, including *In re Merrill Lynch Co., Inc. Research Reports Securities Litigation* ($475 million recovery); *In re Informix Corp. Securities Litigation* ($136.5 million recovery); *In re Alcatel Alsthom Securities Litigation* ($75 million recovery); and *In re Ambac Financial Group, Inc. Securities Litigation* ($33 million recovery).

Christine is an active member of the New York City Bar Association, where she serves as Co-Chair of the Securities Litigation Committee. She is also a member of the American Bar Association and the Puerto Rican Bar Association.

Christine earned her Juris Doctor from the University of Michigan Law School. She received her bachelor's degree from Cornell University.

Christine is conversant in Spanish.



Jamie E. Hanley
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Practice Areas:

- Securities Litigation
- Non-U.S. Securities Litigation

Bar Admissions:

- England & Wales - Solicitor

Jamie E. Hanley is the Partner-in-Charge of the London office of Labaton Keller Sucharow LLP and a member of the Firm's Client Development and Case Evaluation Groups. An accomplished litigator with more than 25 years of experience in the UK, Jamie has represented thousands of individual and institutional investors. His practice focuses on international securities and shareholder rights litigation, as well as advancing corporate governance reforms. In addition to his litigation responsibilities, Jamie serves as a pivotal member of the Firm's Corporate Accountability & Governance Task Force.

Jamie has a particular interest in ESG issues, and throughout his career he has stood on the side of workers and individuals who have been harmed by corporate negligence and malfeasance.

Jamie is recognized as a "Leading Global Litigator" by *Lawdragon.*

Prior to joining Labaton Keller Sucharow LLP, Jamie served at the Management Board level at two leading UK law firms for 17 years and then as General Counsel at the GMB Trade Union, where he retains an interest.

Outside of work, Jamie is heavily engaged in civic and political issues. He is an experienced chairman, having led boards across the legal, political, and educational sectors. He is currently non-executive Chair of a major more than £60 million UK anchor institution. Jamie has twice stood for election to the UK Parliament, and as a policy maker and campaigner, he has worked alongside two UK Prime Ministers and a U.S. President.

Jamie is an active member of Pensions UK (f/k/a PLSA) and Pensions for Purpose.

Jamie graduated with Honours in Law from The University of Hull, subsequently graduating from The College of Law with Commendation. Jamie is also a graduate of the Oxford University Executive Leadership Programme. Jamie is a practicing solicitor and is qualified to practice in England and Wales.



Jesse L. Jensen
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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York
- Supreme Court of the United States

Jesse L. Jensen is a Partner in the New York office of Labaton Keller Sucharow LLP and a member of the Firm's Securities Litigation Practice. Jesse focuses on prosecuting complex securities fraud cases on behalf of the Firm's institutional investor clients. He has extensive experience managing all phases of litigation, from investigation through trial.

Jesse has been widely recognized for his achievements in securities litigation. *Benchmark Litigation* has repeatedly named him to its "40 & Under List" and recognized him as a "Future Star," and *Lawdragon* has included him among its "500 Leading Plaintiff Financial Lawyers."

Jesse has been an integral part of the litigation teams that recovered over $1 billion dollars lost from alleged corporate fraud and misconduct in numerous major actions, including *In re Kraft Heinz Securities Litigation* ($450 million recovery), *In re Wilmington Trust Securities Litigation* ($210 million recovery), *Lord Abbett Affiliated Fund, Inc. v. Navient Corp.* ($35 million recovery), and *In re Synchrony Financial Securities Litigation* ($34 million recovery), among others.

Prior to joining Labaton Keller Sucharow, Jesse was a Partner at Bernstein Litowitz Berger & Grossmann LLP, focusing on complex commercial and securities litigation. Earlier in his career, Jesse was an Associate at Hughes Hubbard & Reed LLP, where he specialized in audit and accounting liability issues.

Jesse earned his Juris Doctor from New York University School of Law, where he served as Editor of the *NYU Journal of Law and Business*. Jesse received his Bachelor of Arts from the University of Washington.



Domenico “Nico” Minerva
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Practice Areas:

- Securities Litigation
- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- New York
- Delaware

Domenico “Nico” Minerva is a Partner in the New York office of Labaton Keller Sucharow LLP. A former financial advisor, his work focuses on securities and shareholder derivative litigation, representing Taft-Hartley, public pension funds, hedge funds, asset managers, insurance companies, and banks across the world. Nico advises leading pension funds and other institutional investors on issues related to corporate fraud in the U.S. securities markets. In addition to his litigation responsibilities, Nico serves as Co-Chair of the Firm’s Corporate Accountability & Governance Task Force.

Nico is described by clients as “always there for us” and known to provide “an honest answer and describe all the parameters and/or pitfalls of each and every case.” As a result of his work, the Firm has received a Tier 1 ranking in Class Actions from *The Legal 500*. *Lawdragon* has recognized Nico as one of the country’s “Leading Plaintiff Financial Lawyers” and “Leading Global Litigators.”

Nico’s extensive securities litigation experience includes the case against global security systems company Tyco and co-defendant PricewaterhouseCoopers (*In re Tyco International Ltd., Securities Litigation*), which resulted in a $3.2 billion settlement—the largest single-defendant settlement in post-PSLRA history.

He also has counseled companies and institutional investors on corporate governance reform. Nico played an important role in the $1 billion recovery in *In re Dell Technologies Inc. Class V Stockholders Litigation*, which currently stands as the largest shareholder settlement ever in any state court in America and the 17th largest shareholder settlement of all time in federal and state court.

On behalf of consumers, Nico represented a plaintiff in *In re ConAgra Foods Inc.,* over misleading claims that Wesson-brand vegetable oils are 100% natural.

An accomplished speaker, Nico has given numerous presentations to investors on topics related to corporate fraud, wrongdoing, and waste.

He is an active member of the National Association of Public Pension Plan Attorneys (NAPPA) and the International Foundation of Employee Benefit Plans (IFEBP).

Nico earned his Juris Doctor from Tulane University Law School, where he completed a two-year externship with the Honorable Kurt D. Engelhardt of the United States District Court for the Eastern District of Louisiana. He received his bachelor's degree from the University of Florida.



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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York
- Supreme Court of the United States

Lauren A. Ormsbee is a Partner in the New York office of Labaton Keller Sucharow LLP. Leading one of the Firm's Securities Litigation teams, her practice focuses on prosecuting complex securities fraud cases on behalf of institutional investors. She is actively overseeing cases against New York Community Bancorp, Extreme Networks, Zeta Global Holdings, KinderCare, and QuidelOrtho Corporation.

Lauren has been recognized as one of "The Top 50 Attorneys of New York" by *Attorney Intel* and has been named a "Leading Plaintiff Financial Lawyer" and among the "Leading Lawyers in America" by *Lawdragon*. *Crain's New York Business* selected her to its lists of "Notable Women in Law" and "Notable Litigators and Trial Attorneys." Lauren has been named a finalist for "Securities Lawyer of the Year" and "Thought Leader of the Year" by *The Women in Business Law Awards*, and *Law.com's* Women, Influence, & Power in Law Awards named Lauren a finalist for "Ally of the Year" in recognition of her commitment to fostering a culture of belonging and empowerment.

Lauren has obtained hundreds of millions of dollars in recoveries representing institutional investors and individuals in a variety of class and direct actions involving securities fraud and other fiduciary violations, including *In re HealthSouth Bondholder Litigation*, resulting in a $230 million recovery; *In re Wilmington Trust Securities Litigation*, resulting in a $210 million recovery; *In re SCANA Corporation Securities Litigation*, resulting in a $192.5 million recovery; *In re Allergan Generic Drug Pricing Securities Litigation*, resulting in a $130 million recovery; *In re New Century Securities Litigation*, resulting in a $125 million recovery; and *Lilien v. Olaplex Holdings, Inc.*, resulting in a $47.5 million recovery, among others.

Prior to joining the Firm, Lauren was a Partner at Bernstein Litowitz Berger & Grossmann LLP focusing on complex commercial and securities litigation. Previously, Lauren was an associate at Paul Weiss

Rifkind Wharton & Garrison LLP and served as a law clerk to the Honorable Colleen McMahon in the Southern District of New York.

Lauren is an active member of the New York City Bar Association, where she previously served as Co-Chair of the Securities Litigation Committee and Chaired the annual Securities Litigation & Enforcement Institute. She is also a member of the National Association of Public Pension Attorneys and serves on *Law360*'s Securities Editorial Advisory Board.

Lauren earned her Juris Doctor, *cum laude*, from the University of Pennsylvania Law School, where she was the Research Editor of the *University of Pennsylvania Law Review*. Lauren received her Bachelor of Arts from Duke University.



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Practice Areas:

- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- Delaware
- New York
- Pennsylvania

Mark D. Richardson is a Partner in the Delaware office of Labaton Keller Sucharow LLP. Mark focuses on representing shareholders in corporate governance and transactional matters, including class action and derivative litigation.

Mark has been recognized by *Chambers & Partners USA* for his work in the Delaware Court of Chancery. He has been recognized by *Benchmark Litigation* as a "Future Star" and has been named to their "40 & Under List," and is recommended by *The Legal 500*. Clients highlighted his team's ability to "generate strong cases and take creative and innovative positions." *Lawdragon* has recognized him as one of the country's "Leading Plaintiff Financial Lawyers" and "Next Generation Lawyers." *The Best Lawyers in America*® named him among the "Ones to Watch" in the Corporate Governance and Compliance Law, Mergers and Acquisitions Law, and Securities Litigation categories.

Mark has litigated numerous matters through trial, including in the Delaware Court of Chancery, FINRA and AAA arbitrations, and a five-month jury trial in New Jersey state court. Mark served as co-lead counsel in the following matters that recently were tried or settled: *In re Dell Technologies Inc. Class V Stockholders Litigation* ($1 billion settlement); *Ontario Provincial Council of Carpenters' Pension Trust Fund, et al. v. Walton, et al.* ($123 million settlement plus corporate governance reforms); *In re Pattern Energy Group Inc. Stockholders Litigation* ($100 million class settlement—largest settlement of *Revlon* claims in Delaware history); *In re TerraForm Power, Inc. Merger Stockholders Litigation* ($83.75 million settlement); *In re Columbia Pipeline Group, Inc.* ($79 million pre-trial partial settlement and $199 million post-trial ruling); *In re Coty Inc. Stockholder Litigation* ($35 million settlement); *In re Straight Path Communications Inc. Consolidated Stockholder Litigation* ($12.5 million partial settlement); *In re Amtrust Financial Services Stockholder Litigation* ($40 million settlement); *In re AGNC Investment Corp.* ($35.5 million settlement); *In re Stamps.com* ($30 million settlement); *In re*

Homefed Corp. ($15 million settlement); and *In re CytoDyn Corp*. (rescission of over $50 million in director and officer stock awards).

Prior to joining Labaton Keller Sucharow, Mark was an Associate at Schulte Roth & Zabel LLP where he gained substantial experience in complex commercial litigation within the financial services industry and advised and represented clients in class action litigation, expedited bankruptcy proceedings and arbitrations, fraudulent transfer actions, proxy fights, internal investigations, employment disputes, breaches of contract, enforcement of non-competes, data theft, and misappropriation of trade secrets.

In addition to his active caseload, Mark has contributed to numerous publications and is the recipient of The Burton Awards Distinguished Legal Writing Award for his article published in the *New York Law Journal*, "Options When a Competitor Raids the Company." His notable publications include the article "'Zapata Drift': A Proposal for Improving Trust in the Special Litigation Committee Process" published in the *Delaware Journal of Corporate Law*. Mark also serves on *Law360*'s Delaware Editorial Advisory Board.

Mark earned his Juris Doctor from Emory University School of Law, where he served as the President of the Student Bar Association. He received his Bachelor of Science from Cornell University.



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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Michael H. Rogers is a Partner in the New York office of Labaton Keller Sucharow LLP. An experienced litigator, Mike focuses on prosecuting complex securities fraud cases on behalf of institutional investors.

Mike is recommended by *The Legal 500* in the area of Securities Litigation.

Mike has been a member of the lead counsel teams in many successful class actions, including those against Countrywide Financial ($624 million settlement), HealthSouth ($671 million settlement), State Street ($300 million settlement), SCANA ($192.5 million settlement), CannTrust (CA $129.5 million settlement), Alexion Pharmaceuticals ($125 million settlement), Mercury Interactive ($117.5 million settlement), Computer Sciences Corp. ($97.5 million settlement), Novavax ($47 million settlement), Jeld-Weld Holding ($40 million recovery), Virtus Investment Partners ($20 million settlement), and Acuity Brands ($15.75 million settlement).

Prior to joining Labaton Keller Sucharow, Mike was an attorney at Kasowitz, Benson, Torres & Friedman LLP, where he practiced securities and antitrust litigation, representing international banking institutions bringing federal securities and other claims against major banks, auditing firms, ratings agencies and individuals in complex multidistrict litigation. Mike began his career as an attorney at Sullivan & Cromwell, where he was part of Microsoft's defense team in the remedies phase of the Department of Justice antitrust action against the company.

Mike earned his Juris Doctor, *magna cum laude*, from the Benjamin N. Cardozo School of Law, Yeshiva University. He received his bachelor's degree, *magna cum laude*, from Columbia University.

Mike is proficient in Spanish.



Brendan W. Sullivan
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Practice Areas:

- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- Delaware

Brendan W. Sullivan is a Partner in the Delaware office of Labaton Keller Sucharow LLP. He focuses on representing investors in corporate governance and transactional matters, including class action litigation.

Brendan helped secure a $100 million settlement, currently the largest settlement of *Revlon* claims in Delaware history, in *In re Pattern Energy Group Inc. Stockholders Litigation,* an $83.75 million settlement in *In re TerraForm Power, Inc. Merger Stockholders Litigation* and a $79 million pre-trial partial settlement with trial judgment in excess of $200 million in *In re Columbia Pipeline Group, Inc. Merger Litigation*.

Brendan is recommended by *The Legal 500* for the excellence of his work in the Delaware Court of Chancery and Dispute Resolution and is recognized as a “Leading Plaintiff Financial Lawyer” and “Next Generation Lawyer” by *Lawdragon*. *Law360* named him a “Securities Rising Star” and *Benchmark Litigation* also named him to their “40 & Under List.”

Prior to joining Labaton Keller Sucharow, Brendan was an Associate at Paul, Weiss, Rifkind, Wharton & Garrison LLP where he gained substantial experience in class and derivative matters relating to mergers and acquisitions and corporate governance. During law school, he was a Law Clerk for Honorable Judge Leonard P. Stark, U.S. District Court for the District of Delaware.

Brendan’s pro bono experience includes representing a Delaware charter school in a mediation concerning a malpractice claim against its former auditor.

Brendan earned his Juris Doctor from Georgetown University Law Center where he was the Notes Editor on the *Georgetown Law Journal* and his Bachelor of Arts from the University of Delaware.



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Practice Areas:

- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- New York

John Vielandi is a Partner in the New York office of Labaton Keller Sucharow LLP. John focuses on representing investors in corporate governance and fiduciary duty matters, including shareholder class and derivative litigation.

John has been recognized as a "Leading Plaintiff Financial Lawyer" by *Lawdragon*.

Notable matters where John served as lead or co-lead counsel include *In re Warner Bros. Discovery, Inc. Stockholders Litigation* ($125 million class settlement); *Ontario Provincial Council of Carpenters Pension Trust Fund v Walton et al.* ($123 million derivative settlement and robust governance reforms); *In re Pattern Energy Group Inc. Stockholders Litigation* ($100 million class settlement); *In re TerraForm Power, Inc. Merger Stockholders Litigation* ($83.75 million settlement); *Nantahala Capital Partners II Limited Partnership v. QAD Inc.* ($65 million class settlement); *In re Coty Inc. Stockholder Litigation* ($35 million class and derivative settlement and additional governance reforms); *Employees' Retirement System of Rhode Island v Marciano et al*. ($30 million derivative settlement and substantial governance reforms); *Macomb County Employees' Retirement System v. McBride et al.*, ($30 million derivative settlement); *In re Golden Nugget Online Gaming, Inc. Stockholders Litigation* ($22 million class settlement); *In re HomeFed Corp. Stockholder Litigation* ($15 million settlement); *In re Hemisphere Media Group, Inc. Stockholders' Litigation* ($15 million class settlement); and *John Makris, et al. v. Ionis Pharmaceuticals, Inc., et al*. ($12.5 million settlement).

John joined the Firm from Bernstein Litowitz Berger & Grossmann, where he was a key member of the teams that litigated numerous high-profile actions, including *City of Monroe Employees' Retirement System v. Rupert Murdoch et al.* and *In re Vaalco Energy, Inc. Consolidated Stockholder Litigation*. While in law school, John was a Legal Intern at the New York City Office of Administrative

Trials and Hearings and a Judicial Intern for the Honorable Carolyn E. Demarest of the New York State Supreme Court.

John earned his Juris Doctor from Brooklyn Law School, where he was the Notes and Comments Editor for the *Journal of Corporate, Financial and Commercial Law*, and was awarded the CALI Excellence for the Future Award. He received his bachelor's degree from Georgetown University.



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Practice Areas:

- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- Delaware
- New York
- Pennsylvania

Ned Weinberger is a Partner in the Delaware office of Labaton Keller Sucharow LLP and Chair of the Firm's Corporate Governance and Shareholder Rights Litigation Practice.

Ned has been recognized for many years by *Chambers & Partners USA* in the Delaware Court of Chancery, earning a Band 1 ranking. He is noted for being "a very good case strategist and strong oral advocate." After being named a "Future Star" early in his career, Ned is now recognized by *Benchmark Litigation* as a "Litigation Star." He has also been named a "Leading Lawyer" by *The Legal 500*, whose sources remarked that he "is one of the best plaintiffs' lawyers in Delaware," who "commands respect and generates productive discussion where it is needed." *Law360* named Ned a "Titan of the Plaintiffs Bar" in 2025 and *The National Law Journal* named him a "Plaintiffs' Trailblazer." *Lawdragon* has also recognized him as one of the country's "Leading Plaintiff Financial Lawyers," "Leading Litigators," and "Leading Lawyers in America." *The Best Lawyers in America*® listed him as one of the "Best Lawyers in America" in the Litigation: Mergers and Acquisitions category. In addition, Ned was a finalist for "Plaintiff Attorney of the Year" by *The National Law Journal's* "Elite Trail Lawyers" and "Litigator of the Year" by *The American Lawyer*.

Ned was named a "Litigator of the Week" by The American Lawyer for securing a $1 billion cash settlement three weeks before trial in *In re Dell Technologies Inc. Class V Stockholders Litigation*. The $1 billion recovery in *Dell*, which the Delaware Court of Chancery described as the "first home run" in M&A shareholder litigation, currently stands as the largest shareholder settlement ever in any state court in America and the 17th largest shareholder settlement of all time in federal and state court.

Other notable recoveries where Ned served as lead or co-lead counsel include: *In re Warner Brothers Discovery, Inc. Stockholder Litigation* ($125 million cash settlement); *Ontario Provincial Council of Carpenters' Pension Trust Fund, et al. v. Walton, et al*. ($123 million settlement plus corporate

governance reforms); *In re Pattern Energy Group Inc. Stockholders Litigation* ($100 million class settlement); *In re TerraForm Power, Inc. Merger Stockholders Litigation* ($83.75 million settlement); *In re Columbia Pipeline Group, Inc. Merger Litigation* ($79 million pre-trial settlement with individual defendants; claims against corporate defendant tried to judgment); *Nantahala Capital Partners II Limited Partnership v. QAD Inc.* ($65 million class recovery); *In re Cornerstone Building Brands, Inc. Stockholder Litigation* ($45 million) *In re AmTrust Financial Services Inc. Stockholder Litigation* ($40 million class settlement); *H&N Management Group, Inc. & Aff Cos Frozen Money Purchase Plan v. Couch, et al*. ($35.5 million class settlement); *Employees' Retirement System of Rhode Island v. Marciano et al*. ($30 million settlement, plus significant corporate governance reforms); *In re HomeFed Corp. Stockholder Litigation* ($15 million settlement); and *John Makris, et al. v. Ionis Pharmaceuticals, Inc., et al.* ($12.5 million settlement), among others.

Ned is a Member of the Advisory Board of the Institute for Law and Economic Policy (ILEP), a research and educational foundation dedicated to enhancing investor and consumer access to the civil justice system. Ned also serves on the Board of Directors of the Jewish Federation of Delaware.

Ned earned his Juris Doctor from the Louis D. Brandeis School of Law at the University of Louisville, where he served on the *Journal of Law and Education*. He received his bachelor's degree, *cum laude*, from Miami University.



Mark S. Willis
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Practice Areas:

- Securities Litigation
- Non-U.S. Securities Litigation

Bar Admissions:

- District of Columbia

Mark S. Willis is a Partner in the Washington, D.C. and London offices of Labaton Keller Sucharow LLP. With more than three decades of experience, his practice focuses on domestic and international securities litigation. Mark advises leading pension funds, investment managers, and other institutional investors from around the world on their legal remedies when impacted by securities fraud and corporate governance breaches. Mark also heads the Firm's non-U.S. practice, advising clients in over 100 cases in jurisdictions such as Australia, Japan, Brazil, Canada, the UK, Germany, the Netherlands, Italy, Denmark, and elsewhere. This practice is wholly unique in that it is genuinely global, independent, and fully comprehensive.

Mark is recommended by *The Legal 500* for excellence in securities litigation and has been named one of *Lawdragon*'s top "Global Plaintiff Lawyers," "Leading Global Litigators," and "Leading Plaintiff Financial Lawyers in America." Under his leadership, the Firm has been awarded *Law360*'s "Practice Group of the Year Awards" for Class Actions and Securities.

In U.S. matters, Mark currently represents La Caisse, one of Canada's largest institutional investors, against PayPal in one of the largest ongoing U.S. shareholder class actions, as well as the Utah Retirement Systems in several pending shareholder actions. He represented institutions from the UK, Spain, the Netherlands, Denmark, Germany, Belgium, Canada, Japan and the U.S. in a novel lawsuit in Texas against BP plc that salvaged claims dismissed from the parallel U.S. class action. In the *Converium* class action, Mark represented a Greek institution in a nearly four-year battle that eventually became the first U.S. class action settled on two continents (*i.e.*, New York and Amsterdam). The Dutch portion of this $145 million trans-Atlantic recovery involved a landmark decision that substantially broadened that court's jurisdictional reach to a scenario where the claims were not brought under Dutch law, the wrongdoing occurred outside the Netherlands, and none of the parties were domiciled

there. In the *Parmalat* case, known as the "Enron of Europe" due to the size and scope of the fraud, Mark represented a group of European institutions and eventually recovered nearly $100 million and negotiated governance reforms with two large European banks, making this the first time in a shareholder class action that such reforms were secured from non-issuer defendants.

Mark has written on corporate, securities, and investor protection issues—often with an international focus—in industry publications such as *International Law News*, *Professional Investor*, *European Lawyer*, and *Investment & Pensions Europe*. He has also authored several chapters in international law treatises on European corporate law and on the listing and subsequent disclosure obligations for issuers listing on European stock exchanges. He also speaks at conferences and at client forums on investor protection through the U.S. federal securities laws, corporate governance measures, and the impact on shareholders of non-U.S. investor remedies.

Mark is an active member of the National Association of Public Pension Plan Attorneys (NAPPA).

Mark earned his Juris Doctor from the Pepperdine University School of Law and his Master of Laws from Georgetown University Law Center.



Nicole M. Zeiss
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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Nicole M. Zeiss is a Partner in the New York office of Labaton Keller Sucharow LLP. A litigator with more than two decades of class action experience, Nicole leads the Firm's Settlement Group, which analyzes the fairness and adequacy of the procedures used in class action settlements. Her practice focuses on negotiating and documenting complex class action settlements and obtaining the required court approval of the settlements, notice procedures, and payments of attorneys' fees.

Nicole was part of the Labaton Keller Sucharow team that successfully litigated the $185 million settlement in *In re Bristol-Myers Squibb Securities Litigation*. She played a significant role in *In re Monster Worldwide, Inc. Securities Litigation* ($47.5 million settlement). Nicole also litigated on behalf of investors who were damaged by fraud in the telecommunications, hedge fund, and banking industries. Over the past fifteen years, Nicole has been focused on finalizing the Firm's securities class action settlements, including in cases against Schering-Plough ($473 million), Massey Energy Company ($265 million), SCANA ($192.5 million), Fannie Mae ($170 million), and Alexion Pharmaceuticals ($125 million), among many others.

Prior to joining Labaton Keller Sucharow, Nicole practiced poverty law at MFY Legal Services. She also worked at Gaynor & Bass practicing general complex civil litigation, particularly representing the rights of freelance writers seeking copyright enforcement.

Nicole is a member of the New York City Bar Association and the New York State Bar Association. Nicole also maintains a commitment to pro bono legal services.

She received a Juris Doctor from the Benjamin N. Cardozo School of Law, Yeshiva University, and earned a Bachelor of Arts in Philosophy from Barnard College.

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Practice Areas:

- Securities Litigation

Bar Admissions:

- Illinois
- Florida

Mark Bogen is Of Counsel in the Washington, D.C. office of Labaton Keller Sucharow LLP. Mark advises leading pension funds and other institutional investors on issues related to corporate fraud in domestic and international securities markets. His work focuses on securities and consumer class action litigation, representing Taft-Hartley and public pension funds across the country.

Among his many efforts to protect his clients' interests and maximize shareholder value, Mark helped secure a settlement with Abbott Laboratories' directors, whereby the company agreed to implement sweeping corporate governance reforms, including an extensive compensation clawback provision going beyond the requirements under the Dodd-Frank Act.

Prior to joining the Firm, Mark served as an Assistant State Attorney and as a Special Assistant to the State Attorney's Office in the State of Florida. Previously, he served as legal counsel to the American Association of Professional Athletes, an organization of more than 4,000 retired professional athletes. Mark also has extensive experience writing weekly legal columns for the *Sun Sentinel*, one of the largest daily newspapers circulated in Florida.

Mark earned his Juris Doctor from Loyola University School of Law. He received his bachelor's degree from the University of Illinois.



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Hui Chang
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Practice Areas:

- Non-U.S. Securities Litigation
- Securities Litigation

Bar Admissions:

- New York

Hui Chang is Of Counsel in the New York office of Labaton Keller Sucharow LLP where she concentrates her practice in the areas of securities and shareholder litigation. As a co-manager of the Firm's Non-U.S. Securities Litigation Practice, Hui advises institutional investor clients regarding fraud-related losses on securities, and on the investigation and development of securities fraud actions outside of the United States. She is actively involved in litigating high-profile cases against Microsoft and Regeneron, among others.

Hui previously served as a member of the Firm's Case Evaluation Group, where she was involved in the identification, investigation, and development of potential actions to recover investment losses resulting from violations of the federal securities laws and corporate and fiduciary misconduct. Hui has assisted the Firm in securing a number of lead counsel appointments in several high-profile class actions.

Hui has been recognized as a "Next Generation Lawyer" by *Lawdragon*.

Prior to joining the Firm, Hui was a Litigation Associate at a national firm primarily focused on securities class action litigation, where she played a key role in prosecuting a number of high-profile securities fraud class actions, including *In re Petrobras Securities Litigation* ($3 billion recovery).

She is a member of the National Association of Public Pension Plan Attorneys (NAPPA), the National Association of State Retirement Administrators (NASRA), the National Council on Teacher Retirement (NCTR), and the State Association of County Retirement Systems (SACRS).

Hui earned her Juris Doctor from the University of California College of the Law, San Francisco, where she worked as a Graduate Research Assistant and a Moot Court Teaching Assistant. She received her bachelor's degree from the University of California, Berkeley.

Hui is fluent in Portuguese and proficient in Taiwanese.



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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Derick I. Cividini is Of Counsel in the New York office of Labaton Keller Sucharow LLP, where he serves as the Firm's Director of E-Discovery. Derick focuses his practice on prosecuting complex securities fraud cases on behalf of institutional investors, including class actions, corporate governance matters, and derivative litigation. As the Director of E-Discovery, he is responsible for managing the Firm's discovery efforts, particularly with regard to the implementation of e-discovery best practices for ESI (electronically stored information) and other relevant sources. In addition to his litigation responsibilities, Derick is a member of the Firm's Artificial Intelligence Committee.

Derick's discovery efforts helped the Firm secure the historic $1 billion settlement in *In re Dell Technologies Inc. Class V Stockholders Litigation*, currently standing as the largest shareholder settlement ever in any state court in America and the 17th largest shareholder settlement of all time in federal and state court; a $516 million in settlements in *In re Lehman Brothers Equity/Debt Securities Litigation*; a $210 million settlement (pending final court approval) in *In re Fidelity National Information Securities Litigation*; and a $200 million recovery in *Boston Retirement System v. Uber Technologies, Inc.*, among others. His discovery efforts also played an instrumental role in securing a historic jury verdict in a landmark data privacy case against tech giant Meta Platforms, in *Frasco v. Flo Health*—one of the first cases where a jury has held a major technology company accountable for its handling of consumer health information.

Derick earned his Juris Doctor and Master of Business Administration from Rutgers University. He received his Bachelor of Science in Finance from Boston College.



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Practice Areas:

- Securities Litigation

Bar Admissions:

- Rhode Island

Arthur E. Coia, II is Of Counsel to Labaton Keller Sucharow LLP, where he advises leading pension funds, Taft-Hartley funds, and other institutional investors on corporate fraud in both domestic and international securities markets.

Arthur brings a wealth of experience to his role, with more than 25 years of experience in investments and their application to tax-exempt benefit plans, and more than a decade of experience helping investors recover losses attributable to corporate fraud.

Prior to joining the Firm, Arthur worked with legal and investment teams on developing client strategy. Previously, he served as the President of a Registered Investment Advisor for over 10 years.

Arthur has the distinction of being a fourth generation member of the Laborers' International Union of North America (LiUNA!). He has also been a member of Laborers Local 271 for more than 37 years, where he served as a delegate to the 1991 International Convention.

Arthur often speaks at benefits related educational conferences such as the International Foundation of Employee Benefit Plans (IFEBP) and the National Labor Management Conference (NLMC).

Arthur earned his Juris Doctor from Georgetown University Law Center. He received his Bachelor of Science in Business Administration and Finance from Georgetown University.



James M. Fee
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Practice Areas:

- Alternative Dispute Resolution
- Consumer Protection and Data Privacy Litigation
- Securities Litigation

Bar Admissions:

- New York
- Massachusetts

James M. Fee is Of Counsel in the New York office of Labaton Keller Sucharow LLP. As a senior member of the Firm's Alternative Dispute Resolution (ADR) Practice, he represents more than two million clients in complex matters involving data breaches, misuse of personal data, cryptocurrency, consumer finance, and personal banking litigation.

In addition to his work in ADR, James has significant experience prosecuting securities fraud class actions on behalf of institutional investors. James has been a key member of teams that achieved significant recoveries for investors in actions against Alexion Pharmaceuticals ($125 million settlement), Catalent ($78 million settlement), Oak Street Health ($60 million settlement), Masimo ($33.75 million settlement), and Barclays PLC ($19.5 million settlement), among others.

James has been recognized as a "Next Generation Lawyer" by *Lawdragon*.

Prior to joining the Firm, James was an Associate at a plaintiffs' securities litigation firm where he was involved in the prosecution of several high-profile securities class actions including cases against Equifax ($149 million settlement), Novo Nordisk ($100 million settlement), and Boeing. Previously, James served as a Legislative Aide at the U.S. Senate.

James has extensive pro bono experience, which includes working on asylum applications, drafting various amicus filings, and successfully resolving Section 1983 claims brought by a Rikers Island inmate. Additionally, James is an Accredited Attorney at the U.S. Department of Veterans Affairs, qualified to assist veterans with their disability benefits claims.

James earned a Juris Doctor from Boston College Law School, where he was Executive Articles Editor of the *Boston College International & Comparative Law Review*. He received a Bachelor of Arts in Political Science from the University of Pennsylvania, where he received the Class of 1915 Award in recognition of his academic and athletic achievements.



Michael F. Flaherty
Of Counsel

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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York
- Massachusetts

Michael F. Flaherty is Of Counsel to Labaton Keller Sucharow LLP, where he advises leading pension funds, Taft-Hartley funds, and other institutional investors on corporate fraud in both domestic and international securities markets. Michael has more than 25 years of litigation experience representing clients in state and federal courts at both the trial and appellate levels.

Prior to joining the Firm, Michael was General Counsel at the Boston Water & Sewer Commission. Previously, he was a Partner at a national litigation firm, where he represented clients in complex legal matters. Michael also served as President of the Boston City Council and as Boston City Councilor at Large, as well as Assistant District Attorney in the Massachusetts Suffolk County District Attorney's Office.

Michael earned his Juris Doctor from Boston University School of Law. He received his bachelor's degree from Boston College.



Joshua M. Glasser
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Practice Areas:

- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- New York

Joshua M. Glasser is Of Counsel in the New York office of Labaton Keller Sucharow LLP. Josh focuses his practice on representing investors in corporate governance and transactional matters, including class action and shareholder derivative litigation.

Josh has been recognized as a "Next Generation Lawyer" by *Lawdragon*.

Josh helped the Firm secure notable recoveries in *In re Warner Bros. Discovery, Inc. Stockholders Litigation* ($125 million settlement); *Bucks County Employees' Retirement System v. Clayton, Dubilier & Rice, LLC* ($70 million settlement); *In re Cornerstone Building Brands, Inc. Stockholders Litigation* ($45 million settlement); *Employees' Retirement System of Rhode Island v. Marciano et al.* ($30 million settlement and corporate governance reforms); *Kormos v. Playtika Holding UK II Limited* ($24.75 million settlement); *In re Hemisphere Media Grp., Inc. Stockholders Litigation* ($15 million settlement); and *In re Sculptor Capital Management, Inc. Stockholder Litigation* ($6.5 million settlement and credit for contributing to increased merger price).

Before joining the Firm, Josh was an Associate at a multinational law firm, where his practice focused on litigating shareholder class and derivative actions under Delaware and federal law. Previously, he was a Judicial Law Clerk for the Honorable Karen L. Valihura of the Delaware Supreme Court. While in law school, Josh was a Legal Intern for the U.S. Department of Justice Civil Division Federal Programs Branch.

Josh's pro bono experience includes representing criminal defendants, including arguing an appeal before the New York State Supreme Court, Appellate Division, First Department, and serving the City of New York as a Special Assistant Corporation Counsel.

Josh is a member of the Hebrew Free Loan Society's Next Generation Steering Committee.

Josh earned his Juris Doctor, *cum laude*, from Georgetown University Law Center, where he served on the Executive Board of the *American Criminal Law Review* and as Managing Editor of the journal's *Annual Survey of White Collar Crime*. He received his Bachelor of Arts in History, *magna cum laude*, from Amherst College.



Lara Goldstone
Of Counsel

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Practice Areas:

- Securities Litigation

Bar Admissions:

- Colorado

Lara Goldstone is Of Counsel in the New York office of Labaton Keller Sucharow LLP. Lara advises leading pension funds and other institutional investors in the United States and Canada on issues related to corporate fraud in the U.S. securities markets. Her work focuses on monitoring the well-being of institutional investments and counseling clients on best practices in securities, corporate governance and shareholder rights, and consumer class action litigation. She is a member of the Firm's Women's Initiative.

Lara has achieved significant settlements on behalf of clients. She represented investors in high-profile cases against LifeLock, KBR, Fifth Street Finance Corp., NII Holdings, Rent-A-Center, and Castlight Health. Lara has also served as legal adviser to clients who have pursued claims in state court, derivative actions in the form of serving books and records demands, and non-U.S. actions.

Before joining Labaton Keller Sucharow, Lara worked as a Legal Intern in the Larimer County District Attorney's Office and the Jefferson County District Attorney's Office. She also volunteered at Crossroads Safehouse, which provided legal representation to victims of domestic violence. Prior to her legal career, Lara worked at Industrial Labs where she worked closely with Federal Drug Administration standards and regulations. In addition, she was a teacher in Irvine, California.

Lara is an active member of the International Foundation of Employee Benefit Plans (IFEBP) and Texas Association of Public Employee Retirement Systems (TEXPERS).

Lara earned her Juris Doctor from the University of Denver Sturm College of Law. She received her bachelor's degree from George Washington University, where she was a recipient of a Presidential Scholarship for academic excellence.



Matthew J. Grier
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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York
- Arizona

Matthew J. Grier is Of Counsel in the New York office of Labaton Keller Sucharow LLP. Matt focuses his practice on litigating securities fraud class actions on behalf of institutional investors.

Matt has played a key role in recent successes in securities cases, including in matters involving Hain Celestial Group, Inc. ($35 million settlement). He is currently litigating cases against General Motors and Nike, among other matters.

Matt has been recognized as a "Next Generation Lawyer" by *Lawdragon* and a “Premier Class Action Leader of Tomorrow” by *Class Action Updates*.

Prior to joining the Firm, Matt was an Associate at a multinational law firm, where his practice focused on commercial and class action litigation, including securities class actions, as well as white collar defense and investigations implicating federal securities laws.

Matt’s pro bono experience includes providing representation to individuals in criminal proceedings.

Matt earned his Juris Doctor, *magna cum laude*, from Fordham University School of Law where he was elected to the Order of the Coif, served as a member of the *Fordham Urban Law Journal*, and received the David F. and Mary Louise Condon Prize in American Legal History and Archibald R. Murray Public Service Award. He received his Bachelor of Arts in Political Science from Kenyon College.



Nicholas D. Manningham
Of Counsel

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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Nicholas D. Manningham is Of Counsel in the New York office of Labaton Keller Sucharow LLP. Nicholas focuses on litigating securities fraud class actions on behalf of institutional investors.

Nicholas has been recognized as a "Next Generation Lawyer" by *Lawdragon*.

Nicholas has been instrumental in securing more than $300 million in settlement relief for investors. Most recently, Nicholas played a leading role in helping the Firm secure a $210 million recovery (pending final court approval) for investors in *In re Fidelity National Information Securities Litigation*. He was also instrumental in helping the Firm recover $60 million for investors in *In re Okta, Inc. Securities Litigation* and $39 million in *In re Opendoor Technologies Inc. Securities Litigation*. Nicholas is actively litigating prominent cases against Roblox, Everbridge, Lockheed Martin, Regeneron, and others.

Nicholas brings substantial litigation and trial experience to the Firm. Nicholas began his legal career as an Assistant Corporation Counsel for the New York City Law Department where he represented the City of New York in federal civil rights actions. There, Nicholas served as lead trial counsel in two federal trials, both of which resulted in complete jury verdicts in favor of his clients. Nicholas also served as Judicial Intern to the Honorable Ramon E. Reyes, Jr. of the U.S. District Court for the Eastern District of New York.

Nicholas is an active member of the New York City Bar Association.

Nicholas earned his Juris Doctor, *cum laude*, from Brooklyn Law School. He received his bachelor's degree from the University of Michigan.



James McGovern
Of Counsel

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Practice Areas:

- Securities Litigation
- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- Washington D.C.
- Maryland

James McGovern is Of Counsel in the Washington, D.C. office of Labaton Keller Sucharow LLP and advises leading pension funds and other institutional investors on issues related to corporate fraud in domestic and international securities markets. James' work focuses primarily on securities litigation and corporate governance, representing Taft-Hartley, public pension funds, and other institutional investors across the country in domestic securities actions. He also advises clients as to their potential claims tied to securities-related actions in foreign jurisdictions.

James has worked on a number of large securities class action matters, including *In re Worldcom, Inc. Securities Litigation*, the second-largest securities class action settlement since the passage of the PSLRA ($6.1 billion recovery); *In re Parmalat Securities Litigation* ($90 million recovery); *In re American Home Mortgage Securities Litigation* (amount of the opt-out client's recovery is confidential); *In re The Bancorp Inc. Securities Litigation* ($17.5 million recovery); *In re Pozen Securities Litigation* ($11.2 million recovery); *In re Cabletron Systems, Inc. Securities Litigation* ($10.5 million settlement); and *In re UICI Securities Litigation* ($6.5 million recovery).

In the corporate governance arena, James helped bring claims against Abbott Laboratories' directors on account of their mismanagement and breach of fiduciary duties for allowing the company to engage in a 10-year off-label marketing scheme. Upon settlement of this action, the company agreed to implement sweeping corporate governance reforms, including an extensive compensation clawback provision going beyond the requirements under the Dodd-Frank Act.

Following the unprecedented takeover of Fannie Mae and Freddie Mac by the federal government in 2008, James was retained by a group of individual and institutional investors to seek recovery of the

massive losses they had incurred when the value of their shares in these companies was essentially destroyed. He brought and continues to litigate a complex takings class action against the federal government for depriving Fannie Mae and Freddie Mac shareholders of their property interests in violation of the Fifth Amendment of the U.S. Constitution, and causing damages in the tens of billions of dollars.

James also has addressed members of several public pension associations, including the Texas Association of Public Employee Retirement Systems and the Michigan Association of Public Employee Retirement Systems, where he discussed how institutional investors could guard their assets against the risks of corporate fraud and poor corporate governance.

Prior to focusing his practice on plaintiffs securities litigation, James was an attorney at Latham & Watkins where he worked on complex litigation and FIFRA arbitrations, as well as matters relating to corporate bankruptcy and project finance. At that time, he co-authored two articles on issues related to bankruptcy filings: *Special Issues In Partnership* and *Limited Liability Company Bankruptcies* and *When Things Go Bad: The Ramifications of a Bankruptcy Filing.*

James earned his Juris Doctor, *magna cum laude*, from Georgetown University Law Center. He received his bachelor's and master's from American University, where he was awarded a Presidential Scholarship and graduated with high honors.



Elizabeth Rosenberg
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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York

Elizabeth Rosenberg is Of Counsel in the New York office of Labaton Keller Sucharow LLP. Elizabeth focuses on litigating complex securities fraud cases on behalf of institutional investors, with a focus on obtaining court approval of class action settlements, notice procedures and payment of attorneys' fees.

Prior to joining Labaton Keller Sucharow, Elizabeth was an Associate at Whatley Drake & Kallas LLP, where she litigated securities and consumer fraud class actions. Elizabeth began her career as an Associate at Milberg LLP where she practiced securities litigation and was also involved in the pro bono representation of individuals seeking to obtain relief from the World Trade Center Victims' Compensation Fund.

Elizabeth earned her Juris Doctor from Brooklyn Law School. She received her bachelor's degree from the University of Michigan.



William Schervish
Of Counsel

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Practice Areas:

- Securities Litigation

Bar Admissions:

- New York
- Florida

William Schervish is Of Counsel in the New York office of Labaton Keller Sucharow LLP and serves as the Firm's Director of Financial Research. As a key member of the Firm's Case Evaluation Group, William identifies, analyzes, and develops cases alleging securities fraud and other forms of corporate misconduct that expose the Firm's institutional clients to legally recoverable losses.

William has been practicing securities law for more than 15 years. As a complement to his legal experience, William is a Certified Public Accountant (CPA), a CFA® Charterholder, and a Certified Fraud Examiner (CFE) with extensive work experience in accounting and finance.

William has played a key role in filing several matters on behalf of the Firm, including *In re Fidelity National Information Services, Inc. Securities Litigation* ($210 million recovery, pending final court approval); *In re The Estée Lauder Companies, Inc. Securities Litigation* ($210 million recovery, pending final court approval); *In re Barrick Gold Securities Litigation* ($140 million recovery); *In re Nielsen Holdings PLC Securities Litigation* ($73 million recovery); and *In re Uniti Group Inc. Securities Litigation* ($39 million recovery), among others.

Prior to joining the Firm, William worked as a finance attorney at Mayer Brown LLPs. William's professional background also includes positions in controllership, securities analysis, and commodity trading. He began his career as an auditor at PricewaterhouseCoopers.

William earned a Juris Doctor, *cum laude*, from Loyola University. He received a Bachelor of Science, *cum laude*, in Business Administration from Miami University, where he was a member of the Business and Accounting Honor Societies.

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Scott M. Tucker
Of Counsel

Practice Areas:

- Corporate Governance and Shareholder Rights Litigation

Bar Admissions:

- Delaware
- Connecticut

Scott M. Tucker is Of Counsel in the Delaware office of Labaton Keller Sucharow LLP. He focuses his practice on representing investors in corporate governance and transactional matters, including class action and shareholder derivative litigation.

Scott has received a Distinguished rating from *Martindale-Hubbell*.

Scott has obtained significant recoveries in shareholder litigation, including *City of Roseville Employees' Retirement System v. Ellison* ($440 million settlement); *In re Kinder Morgan, Inc. Shareholders Litigation* ($200 million settlement); *In re Madison Square Garden Entertainment Corp. Stockholders Litigation* ($48.5 million settlement); *Melchior et al. v. Vagnozzi, et al.* ($38 million settlement); *In re Sanchez Derivative Litigation* ($30 million settlement); *In re J.Crew Group, Inc., Shareholders Litigation* ($16 million settlement, plus significant corporate governance reforms); *In re FAST Acquisition Corp. Stockholders Litigation* ($12.5 million settlement); and *In re Genentech, Inc. Shareholder Litigation* ($4 billion increase in a go-private offer).

Previously, Scott was a Partner at a leading Delaware firm focusing on complex class and derivative fiduciary and corporate governance litigation.

Scott is a guest lecturer on fiduciary duties, corporate governance, and derivative litigation at the Syracuse University College of Law.

He served on the Board of Bar Examiners of the Supreme Court of the State of Delaware as Secretary from 2015 to 2017, Assistant Secretary from 2013 to 2015, and Associate Member from 2010 to 2013.

Scott is a member of the Richard S. Rodney Inn of Court and currently serves as Legal Advisor to the Bridleshire Farms Homeowners Association.

Scott earned his Juris Doctor, *cum laude*, from Syracuse University College of Law, where he was a member of the Securities Arbitration Clinic and received a Corporate Counsel Certificate from the Center for Law and Business Enterprise. He earned his Master of Business Administration from the Whitman School of Management at Syracuse University and received his bachelor's degree, *cum laude*, from the State University of New York College at Cortland.

Exhibit 7

LABATON KELLER SUCHAROW LLP
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Michael H. Rogers (*pro hac vice*)
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Counsel for Lead Plaintiff and Proposed Class Counsel

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SYLEBRA CAPITAL PARTNERS MASTER FUND LTD, SYLEBRA CAPITAL PARC MASTER FUND AND SYLEBRA CAPITAL MENLO MASTER FUND, Plaintiffs, vs. EVERBRIDGE, INC., DAVID MEREDITH, PATRICK BRICKLEY, and JAIME ELLERTSON, Defendants.	Case No. 2:22-cv-02249-FWS-RAOx CLASS ACTION DECLARATION OF RYAN A. LLORENS FILED ON BEHALF OF ROBBINS GELLER RUDMAN & DOWD LLP IN SUPPORT OF APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES Hearing Date: December 17, 2026 Time: 10:00 a.m. Courtroom: 10D Judge: Hon. Fred W. Slaughter

I, RYAN A. LLORENS, declare as follows, pursuant to 28 U.S.C. §1746:

1. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm"). I submit this declaration in support of my Firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action (the "Action") [1] from the inception of my Firm's involvement through August 5, 2026 (the "Time Period").

2. My Firm, which served as counsel for proposed additional class representative Central Laborers' Pension Fund and Liaison Counsel for the proposed class in the Action, was involved throughout the course of the litigation, at various stages of the Action, which is described in the accompanying Declaration of Michael H. Rogers in Support of (I) Motion for Final Approval of Class Action Settlement and Plan of Allocation and (II) Motion for an Award of Attorneys' Fees and Expenses, filed herewith.

3. The information in this declaration regarding the Firm's time and expenses is taken from time and expense reports and supporting documentation prepared and/or maintained by the Firm in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the Action and I reviewed these reports (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and reasonableness of, the time and expenses committed to the Action. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. Based on this review and the adjustments made, I believe that the time reflected in the Firm's lodestar calculation and the expenses for which payment is

[1] All capitalized terms used in this declaration that are not defined have the same meanings as in the Stipulation and Agreement of Settlement, dated as of August 10, 2026 ("Stipulation"). *See* ECF 188-3.

sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the Action.

4. After this review, the number of hours spent on the Action by my firm is 641.40. The lodestar amount for attorney/professional support staff time based on the Firm's current hourly rates is $622,745.00. A summary of the lodestar at current rates is provided in Exhibit A and, pursuant to the Court's Civil Standing Order, a breakdown of the work associated with the lodestar, by task code, at historical rates is provided in Exhibits B and C. The schedules were prepared from daily time records regularly prepared and maintained by my Firm, which are available at the request of the Court. Time expended in preparing this application for fees and payment of expenses has not been included. The hourly rates shown in Exhibits A-C are consistent with the hourly rates submitted by the Firm in other contingent complex litigations. The Firm's rates are set based on periodic analysis of rates used by firms performing comparable work both on the plaintiff and defense sides. For personnel who are no longer employed by the Firm, the "current rate" used for the lodestar calculation is the rate for that person in his or her final year of employment with the Firm.

5. As detailed in Exhibit D, my Firm seeks a total of $53,065.38 in expenses in connection with the prosecution of the claims. The expenses are reflected on the books and records of my Firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses sought.

6. The following is additional information regarding certain of these expenses:

(a) Filing and Attorney Service Fees: $5,128.70. These expenses have been paid to the Court for, among other things, filing fees for court filings in connection with attorney admissions, and to an attorney service firm who delivered

courtesy copies to Judge's Chambers and served process of the Summons and Complaint.

(b) Deposition Transcripts: $2,805.65. The Firm paid this amount to Deposition Solutions, LLC (d/b/a Lexitas) for deposition transcripts for witnesses Rhumbline Advisors' Representative and the Central Laborers' Pension Fund's Representative.

(c) Work-Related Transportation, Hotels, and Meals: $12,510.32. In connection with the prosecution of the Action, the Firm paid for work-related travel expenses to meet with witnesses for deposition preparation, to attend depositions, and to attend the mediation. Any first-class airfare has been reduced to be comparable to economy rates.

(d) Overnight Delivery Charges: $153.27. The Firm paid overnight delivery vendors for delivery of legal documents.

(e) Online Legal and Financial Research: $2,467.44. This category includes vendors such as LexisNexis Products, Refinitiv, and Westlaw. These resources were used to obtain access to SEC filings, factual databases, legal research, and for proofreading and "blue-booking" court filings (including checking all legal authorities cited and quoted in briefs). This category represents the expenses incurred by Robbins Geller for use of these services in connection with this Litigation. The charges for these vendors vary depending upon the type of services requested. For example, Robbins Geller has flat-rate contracts with some of these providers for use of their services. When Robbins Geller utilizes online services provided by a vendor with a flat-rate contract, access to the service is by a billing code entered for the specific case being litigated. At the end of each billing period in which such service is used, Robbins Geller's costs for such services are allocated to specific cases based on the percentage of use in connection with that specific case in the billing period. As a result of the contracts negotiated by Robbins Geller with certain providers, the class enjoys substantial savings in comparison with the "market-rate" for a la carte use of

such services which some law firms pass on to their clients. For example, the "market-rate" charged to others by LexisNexis for the types of services used by Robbins Geller is more expensive than the rates negotiated by Robbins Geller.

(f) Contribution to Litigation Expense Fund: My Firm contributed $30,000.00 to a Litigation Expense Fund maintained by Labaton Keller Sucharow LLP to manage and monitor the larger expenses in the case.

7. With respect to the standing of my firm, attached hereto as Exhibit E is a brief biography of my firm as well as biographies of the firm's partners and of counsel attorneys.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of November, 2026, at San Diego, California.

Ryan A. Llorens

RYAN A. LLORENS

EXHIBIT A

EXHIBIT A

Sylebra Cap. Partners Master Fund Ltd., et al. v. Everbridge, Inc., et al.,
No. 2:22-cv-02249-FWS-RAOx
Robbins Geller Rudman & Dowd LLP
Inception through August 5, 2026

NAME		***HOURS***	***RATE***	***LODESTAR***
Albert, Michael	(P)	15.30	990	$ 15,147.00
Gusikoff Stewart, Ellen A.	(P)	35.60	1370	48,772.00
Llorens, Ryan A.	(P)	410.60	1100	451,660.00
Robbins, Darren J.	(P)	15.80	1600	25,280.00
Tull, Joseph J.	(A)	121.90	540	65,826.00
Topp, Jennifer M.	(EA)	17.20	425	7,310.00
Koga, Takashi	(LS)	25.00	350	8,750.00
TOTAL		***641.40***		***$ 622,745.00***

(P) Partner
(A) Associate
(EA) Economic Analyst
(LS) Litigation Support

EXHIBIT B

Table B -Lodestar by Timekeeper by Category (Historical Rates)
Robbins Geller Rudman & Dowd LLP

Task 1: Factual Investigation			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Totals for Task 1:		**0.00**	**$0.00**
Task 2: Complaints			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Ryan Llorens (Partner) (2022)	$890	6.50	$5,785.00
Totals for Task 2:		**6.50**	**$5,785.00**

Task 3: Fact Discovery			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Ryan Llorens (Partner) (2026)	$1,100	211.60	$232,760.00
Joseph Tull (Associate) (2026)	$540	78.30	$42,282.00
Takashi Koga (Litigation Support) (2026)	$350	25.00	$8,750.00
Totals for Task 3:		**314.90**	**$283,792.00**

Task 4: Document Review			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Joseph Tull (Associate) (2026)	$540	12.00	$6,480.00
Totals for Task 4:		**12.00**	**$6,480.00**

Task 5: Motions & Legal Research			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Darren Robbins (Partner) (2022)	$1,350	0.50	$675.00
Darren Robbins (Partner) (2026)	$1,600	0.50	$800.00
Michael Albert (Partner) (2026)	$990	2.00	$1,980.00
Ryan Llorens (Partner) (2022)	$890	13.50	$12,015.00
Ryan Llorens (Partner) (2023)	$940	22.00	$20,680.00

Ryan Llorens (Partner) (2026)	$1,100	4.50	$4,950.00
Joseph Tull (Associate) (2026)	$540	1.30	$702.00
Jennifer Topp (Economic/Damage Analyst) (2022)	$335	14.70	$4,924.50
Totals for Task 5:		**59.00**	**$46,726.50**

Task 6: Court Appearances & Prep			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Totals for Task 6:		**0.00**	**$0.00**

Task 7: Work with Experts/Consultants			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Ryan Llorens (Partner) (2026)	$1,100	32.00	$35,200.00
Joseph Tull (Associate) (2026)	$540	0.80	$432.00
Totals for Task 7:		**32.80**	**$35,632.00**

Task 8: Case Management			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Ryan Llorens (Partner) (2026)	$1,100	13.50	$14,850.00
Joseph Tull (Associate) (2026)	$540	0.60	$324.00
Totals for Task 8:		**14.10**	**$15,174.00**

Task 9: Settlement			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Darren Robbins (Partner) (2026)	$1,600	12.80	$20,480.00
Ellen Gusikoff Stewart (Partner) (2026)	$1,370	35.60	$48,772.00
Ryan Llorens (Partner) (2026)	$1,100	56.50	$62,150.00
Joseph Tull (Associate) (2026)	$540	24.10	$13,014.00
Totals for Task 9:		**129.00**	**$144,416.00**

Task 10: Class Certification			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Darren Robbins (Partner) (2026)	$1,600	0.80	$1,280.00
Michael Albert (Partner) (2026)	$990	8.90	$8,811.00
Ryan Llorens (Partner) (2026)	$1,100	18.50	$20,350.00
Totals for Task 10:		**28.20**	**$30,441.00**

Task 11: Strategy & Analysis			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Darren Robbins (Partner) (2026)	$1,600	1.20	$1,920.00
Michael Albert (Partner) (2026)	$990	4.40	$4,356.00
Ryan Llorens (Partner) (2022)	$890	4.00	$3,560.00
Ryan Llorens (Partner) (2023)	$940	3.00	$2,820.00
Ryan Llorens (Partner) (2025	$1,020	3.00	$3,060.00
Ryan Llorens (Partner) (2026)	$1,100	19.00	$20,900.00
Jennifer Topp (Economic/Damage Analyst) (2026)	$425	2.50	$1,062.50
Joseph Tull (Associate) (2026)	$540	4.80	$2,592.00
Totals for Task 11:		**41.90**	**$40,270.50**

Task 12: Appeal			
Professional	**Hourly Rate**	**Hours**	**Historical Lodestar**
Ryan Llorens (Partner) (2024)	$965	1.50	$1,447.50
Ryan Llorens (Partner) (2025)	$1,020	1.50	$1,530.00
Totals for Task 12:		**3.00**	**$2,977.50**
Grand Total:		**641.40**	**$611,694.50**

EXHIBIT C

Table C - Lodestar by Timekeeper by Category (Historical Rates)
Robbins Geller Rudman & Dowd LLP

Partner: Darren Robbins			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
5-Motions & Legal Research (2022)	$1,350	0.50	$675.00
5-Motions & Legal Research (2026)	$1,600	0.50	$800.00
9-Settlement (2026)	$1,600	12.80	$20,480.00
10-Class Certification (2026)	$1,600	0.80	$1,280.00
11-Strategy & Analysis (2026)	$1,600	1.20	$1,920.00
Total:		**15.80**	**$25,155.00**

Partner: Ellen Gusikoff Stewart			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
9-Settlement (2026)	$1,370	35.60	$48,772.00
Total:		**35.60**	**$48,772.00**

Partner: Michael Albert			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
5-Motions & Legal Research (2026)	$990	2.00	$1,980.00
10-Class Certification (2026)	$990	8.90	$8,811.00
11-Strategy & Analysis (2026)	$990	4.40	$4,356.00
Total:		**15.30**	**$15,147.00**

Partner: Ryan Llorens			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
2-Drafting Complaints (2022)	$890.00	6.5	$5,785.00
3-Fact Discovery (2026)	$1,100.00	211.6	$232,760.00
5-Motions & Legal Research (2022)	$890.00	13.5	$12,015.00
5-Motions & Legal Research (2023)	$940.00	22	$20,680.00
5-Motions & Legal Research (2026)	$1,100.00	4.5	$4,950.00
7-Work With Experts/Consultants (2026)	$1,100.00	32	$35,200.00
8-Case Management (2026)	$1,100.00	13.5	$14,850.00
9-Settlement (2026)	$1,100.00	56.5	$62,150.00
10-Class Certification (2026)	$1,100.00	18.5	$20,350.00
11-Strategy & Analysis (2022)	$890.00	4	$3,560.00
11-Strategy & Analysis (2023)	$940.00	3	$2,820.00
11-Strategy & Analysis (2025)	$1,020.00	3	$3,060.00
11-Strategy & Analysis (2026)	$1,100.00	19	$20,900.00
12-Appeal (2024)	$965.00	1.5	$1,447.50
12-Appeal (2025)	$1,020.00	1.5	$1,530.00
Total:		**410.60**	**$442,057.50**

Associate: Joseph Tull			
Task Codes	**Hourly Rate**	**Hours**	**Historical Lodestar**
3-Fact Discovery (2026)	$540	78.30	$42,282.00
4-Document Review (2026)	$540	12.00	$6,480.00
5-Motions & Legal Research (2026)	$540	1.30	$702.00
7-Work With Experts/Consultants (2026)	$540	0.80	$432.00
8-Case Management (2026)	$540	0.60	$324.00
9-Settlement (2026)	$540	24.10	$13,014.00
11-Strategy & Analysis (2026)	$540	4.80	$2,592.00
Total:		**121.90**	**$65,826.00**

Economic/Damage Analyst: Jennifer Topp			
Task Code	**Hourly Rate**	**Hours**	**Historical Lodestar**
5-Motions & Legal Research (2022)	$335	14.70	$4,924.50
11-Strategy & Analysis (2026)	$425	2.50	$1,062.50
Total:		**17.20**	**$5,987.00**

Litigation Support: Takashi Koga			
Task Code	**Hourly Rate**	**Hours**	**Historical Lodestar**
3-Fact Discovery (2026)	$350	25.00	$8,750.00
Total:		**25.00**	**$8,750.00**

Grand Total:		**641.40**	**$611,694.50**

EXHIBIT D

EXHIBIT D

Sylebra Cap. Partners Master Fund Ltd., et al. v. Everbridge, Inc., et al.,
No. 2:22-cv-02249-FWS-RAOx
Robbins Geller Rudman & Dowd LLP
Expense Summary
Inception through August 31, 2026

CATEGORY	***AMOUNT***
Filing and Attorney Service Fees	$ 5,128.70
Work-Related Transportation, Hotels, and Meals	12,510.32
Overnight Delivery Charges	153.27
Deposition Transcripts	2,805.65
Online Legal and Financial Research	2,467.44
Contribution to Litigation Expense Fund	30,000.00
TOTAL	***$ 53,065.38***

EXHIBIT E

FIRM RESUME

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INTRODUCTION

Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm") is a 200-lawyer firm with offices in Boca Raton, Chicago, Manhattan, Melville, Nashville, San Diego, San Francisco, Philadelphia, Washington, D.C., and Wilmington (www.rgrdlaw.com). The Firm is actively engaged in complex litigation, emphasizing securities, consumer, antitrust, insurance, healthcare, human rights, and employment discrimination class actions. The Firm's unparalleled experience and capabilities in these fields are based upon the talents of its attorneys, who have successfully prosecuted thousands of class action lawsuits and numerous individual cases, recovering billions of dollars.

This successful track record stems from our experienced attorneys, including many who came to the Firm from federal or state law enforcement agencies. The Firm also includes several dozen former federal and state judicial clerks.

The Firm is committed to practicing law with the highest level of integrity in an ethical and professional manner. We are a diverse firm with lawyers and staff from all walks of life. Our lawyers and other employees are hired and promoted based on the quality of their work and their ability to treat others with respect and dignity.

We strive to be good corporate citizens and work with a sense of global responsibility. Contributing to our communities and environment is important to us. We often take cases on a *pro bono* basis and are committed to the rights of workers, and to the extent possible, we contract with union vendors. We care about civil rights, workers' rights and treatment, workplace safety, and environmental protection. Indeed, while we have built a reputation as the finest securities and consumer class action law firm in the nation, our lawyers have also worked tirelessly in less high-profile, but no less important, cases involving human rights and other social issues.

PRACTICE AREAS AND SERVICES

Securities Fraud

As recent corporate scandals demonstrate clearly, it has become all too common for companies and their executives – often with the help of their advisors, such as bankers, lawyers, and accountants – to manipulate the market price of their securities by misleading the public about the company's financial condition or prospects for the future. This misleading information has the effect of artificially inflating the price of the company's securities above their true value. When the underlying truth is eventually revealed, the prices of these securities plummet, harming those innocent investors who relied upon the company's misrepresentations.

Robbins Geller is the leader in the fight to protect investors from corporate securities fraud. We utilize a wide range of federal and state laws to provide investors with remedies, either by bringing a class action on behalf of all affected investors or, where appropriate, by bringing individual cases.

The Firm's reputation for excellence has been repeatedly noted by courts and has resulted in the appointment of Firm attorneys to lead roles in hundreds of complex class-action securities and other cases. In the securities area alone, the Firm's attorneys have been responsible for a number of outstanding recoveries on behalf of investors. Currently, Robbins Geller attorneys are lead or named counsel in hundreds of securities class action or large institutional-investor cases. Some notable current and past cases include:

- ***In re Enron Corp. Sec. Litig.***, No. H-01-3624 (S.D. Tex.). Robbins Geller attorneys and lead plaintiff The Regents of the University of California aggressively pursued numerous defendants, including many of Wall Street's biggest banks, and successfully obtained settlements in excess of ***$7.2 billion*** for the benefit of investors. ***This is the largest securities class action recovery in history***.

- ***Jaffe v. Household Int'l, Inc.***, No. 02-C-05893 (N.D. Ill.). As sole lead counsel, Robbins Geller obtained a record-breaking settlement of ***$1.575 billion*** after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a securities fraud verdict in favor of the class. In 2015, the Seventh Circuit Court of Appeals upheld the jury's verdict that defendants made false or misleading statements of material fact about the company's business practices and financial results, but remanded the case for a new trial on the issue of whether the individual defendants "made" certain false statements, whether those false statements caused plaintiffs' losses, and the amount of damages. The parties reached an agreement to settle the case just hours before the retrial was scheduled to begin on June 6, 2016. ***The $1.575 billion settlement, approved in October 2016, is the largest ever following a securities fraud class action trial, the largest securities fraud settlement in the Seventh Circuit and the eighth-largest settlement ever in a post-PSLRA securities fraud case.*** According to published reports, the case was just the seventh securities fraud case tried to a verdict since the passage of the PSLRA.

- ***In re Valeant Pharms. Int'l, Inc. Sec. Litig.***, No. 3:15-cv-07658 (D.N.J.). As sole lead counsel, Robbins Geller attorneys obtained a $1.2 billion settlement in the securities case that *Vanity Fair* reported as "the corporate scandal of its era" that had raised "fundamental questions about the functioning of our health-care system, the nature of modern markets, and the slippery slope of ethical rationalizations." The settlement resolves claims that defendants made false and misleading statements regarding Valeant's business and financial performance during the class period, attributing Valeant's dramatic growth in revenues and profitability to "innovative new marketing approaches" as part of a business model that was low risk and "durable and sustainable." *Valeant* is the largest securities class action settlement against a pharmaceutical manufacturer and the ninth largest ever.

- ***In re Am. Realty Cap. Props., Inc. Litig.***, No. 1:15-mc-00040 (S.D.N.Y.). As sole lead counsel, Robbins Geller attorneys zealously litigated the case arising out of ARCP's manipulative accounting practices and obtained a $1.025 billion settlement. For five years, the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and the Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages of any major PSLRA case prior to trial and includes the largest personal contributions by individual defendants in history.

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). Robbins Geller represented the California Public Employees' Retirement System ("CalPERS") and demonstrated its willingness to vigorously advocate for its institutional clients, even under the most difficult circumstances. The Firm obtained an $895 million recovery on behalf of UnitedHealth shareholders, and former CEO William A. McGuire paid $30 million and returned stock options representing more than three million shares to the shareholders, bringing the total recovery for the class to over $925 million, the largest stock option backdating recovery ever, and ***a recovery that is more than four times larger than the next largest options backdating recovery***. Moreover, Robbins Geller obtained unprecedented corporate governance reforms, including election of a shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercise, and executive compensation reforms that tie pay to performance.

- ***Alaska Elec. Pension Fund v. CitiGroup, Inc. (In re WorldCom Sec. Litig.)***, No. 03 Civ. 8269 (S.D.N.Y.). Robbins Geller attorneys represented more than 50 private and public institutions that opted out of the class action case and sued WorldCom's bankers, officers and directors, and auditors in courts around the country for losses related to WorldCom bond offerings from 1998 to 2001. The Firm's attorneys recovered more than $650 million for their clients, substantially more than they would have recovered as part of the class.

- ***Luther v. Countrywide Fin. Corp.***, No. 12-cv-05125 (C.D. Cal.). Robbins Geller attorneys secured a $500 million settlement for institutional and individual investors in what is the largest RMBS purchaser class action settlement in history, and one of the largest class action securities settlements of all time. The unprecedented settlement resolves claims against Countrywide and Wall Street banks that issued the securities. The action was the first securities class action case filed against originators and Wall Street banks as a result of the credit crisis. As co-lead counsel Robbins Geller forged through six years of hard-fought litigation, oftentimes litigating issues of first impression, in order to secure the landmark settlement for its clients and the class.

- ***In re Wachovia Preferred Sec. & Bond/Notes Litig.***, No. 09-cv-06351 (S.D.N.Y.). On behalf of investors in bonds and preferred securities issued between 2006 and 2008, Robbins Geller and co-counsel obtained a significant settlement with Wachovia successor Wells Fargo & Company and Wachovia auditor KPMG LLP. ***The total settlement – $627 million – is one of the largest credit-crisis***

settlements involving Securities Act claims and one of the 25 largest securities class action recoveries in history. The settlement is also one of the biggest securities class action recoveries arising from the credit crisis. The lawsuit focused on Wachovia's exposure to "pick-a-pay" loans, which the bank's offering materials said were of "pristine credit quality," but which were actually allegedly made to subprime borrowers, and which ultimately massively impaired the bank's mortgage portfolio. Robbins Geller served as co-lead counsel representing the City of Livonia Employees' Retirement System, Hawaii Sheet Metal Workers Pension Fund, and the investor class.

- ***In re Cardinal Health, Inc. Sec. Litig.***, No. C2-04-575 (S.D. Ohio). As sole lead counsel representing Cardinal Health shareholders, Robbins Geller obtained a recovery of $600 million for investors on behalf of the lead plaintiffs, Amalgamated Bank, the New Mexico State Investment Council, and the California Ironworkers Field Trust Fund. At the time, the $600 million settlement was the tenth-largest settlement in the history of securities fraud litigation and is the largest-ever recovery in a securities fraud action in the Sixth Circuit.

- ***AOL Time Warner Cases I & II***, JCCP Nos. 4322 & 4325 (Cal. Super. Ct., Los Angeles Cnty.). Robbins Geller represented The Regents of the University of California, six Ohio state pension funds, Rabo Bank (NL), the Scottish Widows Investment Partnership, several Australian public and private funds, insurance companies, and numerous additional institutional investors, both domestic and international, in state and federal court opt-out litigation stemming from Time Warner's disastrous 2001 merger with Internet high flier America Online. After almost four years of litigation involving extensive discovery, the Firm secured combined settlements for its opt-out clients totaling over $629 million just weeks before The Regents' case pending in California state court was scheduled to go to trial. The Regents' gross recovery of $246 million is the largest individual opt-out securities recovery in history.

- ***In re HealthSouth Corp. Sec. Litig.***, No. CV-03-BE-1500-S (N.D. Ala.). As court-appointed co-lead counsel, Robbins Geller attorneys obtained a combined recovery of $671 million from HealthSouth, its auditor Ernst & Young, and its investment banker, UBS, for the benefit of stockholder plaintiffs. The settlement against HealthSouth represents one of the larger settlements in securities class action history and is considered among the top 15 settlements achieved after passage of the PSLRA. Likewise, the settlement against Ernst & Young is one of the largest securities class action settlements entered into by an accounting firm since the passage of the PSLRA.

- ***Jones v. Pfizer Inc.***, No. 1:10-cv-03864 (S.D.N.Y.). Lead plaintiff Stichting Philips Pensioenfonds obtained a $400 million settlement on behalf of class members who purchased Pfizer common stock during the January 19, 2006 to January 23, 2009 class period. The settlement against Pfizer resolves accusations that it misled investors about an alleged off-label drug marketing scheme. As sole lead counsel, Robbins Geller attorneys helped achieve this exceptional result after five years of hard-fought litigation against the toughest and the brightest members of the securities defense bar by litigating this case all the way to trial.

- ***In re Dynegy Inc. Sec. Litig.***, No. H-02-1571 (S.D. Tex.). As sole lead counsel representing The Regents of the University of California and the class of Dynegy investors, Robbins Geller attorneys obtained a combined settlement of $474 million from Dynegy, Citigroup, Inc., and Arthur Andersen LLP for their involvement in a clandestine financing scheme known as Project Alpha. Most notably, the settlement agreement provides that Dynegy will appoint two board members to be nominated by The Regents, which Robbins Geller and The Regents believe will benefit all of Dynegy's stockholders.

- ***In re Qwest Commc'ns Int'l, Inc. Sec. Litig.***, No. 01-cv-1451 (D. Colo.). In July 2001, the Firm filed the initial complaint in this action on behalf of its clients, long before any investigation into Qwest's financial statements was initiated by the SEC or Department of Justice. After five years of litigation, lead plaintiffs entered into a settlement with Qwest and certain individual defendants that provided a $400 million recovery for the class and created a mechanism that allowed the vast majority of class members to share in an additional $250 million recovered by the SEC. In 2008, Robbins Geller attorneys recovered an additional $45 million for the class in a settlement with defendants Joseph P. Nacchio and Robert S. Woodruff, the CEO and CFO, respectively, of Qwest during large portions of the class period.

- ***Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.***, No. 1:09-cv-03701 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel for a class of investors and obtained court approval of a $388 million recovery in nine 2007 residential mortgage-backed securities offerings issued by J.P. Morgan. The settlement represents, on a percentage basis, the largest recovery ever achieved in an MBS purchaser class action. The result was achieved after more than five years of hard-fought litigation and an extensive investigation.

- ***Smilovits v. First Solar, Inc.***, No. 2:12-cv-00555 (D. Ariz.). As sole lead counsel, Robbins Geller obtained a $350 million settlement in *Smilovits v. First Solar, Inc.* The settlement, which was reached after a long legal battle and on the day before jury selection, resolves claims that First Solar violated §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5. The settlement is the fifth-largest PSLRA settlement ever recovered in the Ninth Circuit.

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, No. 1:08-cv-10783 (S.D.N.Y.). As sole lead counsel, Robbins Geller obtained a $272 million settlement on behalf of Goldman Sachs' shareholders. The settlement concludes one of the last remaining mortgage-backed securities purchaser class actions arising out of the global financial crisis. The remarkable result was achieved following seven years of extensive litigation. After the claims were dismissed in 2010, Robbins Geller secured a landmark victory from the Second Circuit Court of Appeals that clarified the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of MBS investors. Specifically, the Second Circuit's decision rejected the concept of "tranche" standing and concluded that a lead plaintiff in an MBS class action has class standing to pursue claims on behalf of purchasers of other securities that were issued from the same registration statement and backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities.

- ***Schuh v. HCA Holdings, Inc.***, No. 3:11-cv-01033 (M.D. Tenn.). As sole lead counsel, Robbins Geller obtained a groundbreaking $215 million settlement for former HCA Holdings, Inc. shareholders – the largest securities class action recovery ever in Tennessee. Reached shortly before trial was scheduled to commence, the settlement resolves claims that the Registration Statement and Prospectus HCA filed in connection with the company's massive $4.3 billion 2011 IPO contained material misstatements and omissions. The recovery achieved represents more than 30% of the aggregate classwide damages, far exceeding the typical recovery in a securities class action.

- ***In re AT&T Corp. Sec. Litig.***, MDL No. 1399 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased AT&T common stock. The case charged defendants AT&T and its former Chairman and CEO, C. Michael Armstrong, with violations of the federal securities laws in connection with AT&T's April 2000 initial public offering of its wireless tracking stock, one of the largest IPOs in American history. After two weeks of trial, and on the eve of scheduled testimony by Armstrong and infamous telecom analyst Jack Grubman, defendants agreed to settle the case for $100 million.

- ***Silverman v. Motorola, Inc.***, No. 1:07-cv-04507 (N.D. Ill.). The Firm served as lead counsel on behalf of a class of investors in Motorola, Inc., ultimately recovering $200 million for investors just two months before the case was set for trial. This outstanding result was obtained despite the lack of an SEC investigation or any financial restatement.

- ***City of Pontiac Gen. Emps.' Ret. Sys. v. Wal-Mart Stores, Inc.***, No. 5:12-cv-05162 (W.D. Ark.). Robbins Geller attorneys and lead plaintiff City of Pontiac General Employees' Retirement System achieved a $160 million settlement in a securities class action case arising from allegations published by *The New York Times* in an article released on April 21, 2012 describing an alleged bribery scheme that occurred in Mexico. The case charged that Wal-Mart portrayed itself to investors as a model corporate citizen that had proactively uncovered potential corruption and promptly reported it to law enforcement, when in truth, a former in-house lawyer had blown the whistle on Wal-Mart's corruption years earlier, and Wal-Mart concealed the allegations from law enforcement by refusing its own in-house and outside counsel's calls for an independent investigation. Robbins Geller "achieved an exceptional [s]ettlement with skill, perseverance, and diligent advocacy," said Judge Hickey when granting final approval.

- ***Bennett v. Sprint Nextel Corp.***, No. 2:09-cv-02122 (D. Kan.). As co-lead counsel, Robbins Geller obtained a $131 million recovery for a class of Sprint investors. The settlement, secured after five years of hard-fought litigation, resolved claims that former Sprint executives misled investors concerning the success of Sprint's ill-advised merger with Nextel and the deteriorating credit quality of Sprint's customer base, artificially inflating the value of Sprint's securities.

- ***In re LendingClub Sec. Litig.***, No. 3:16-cv-02627 (N.D. Cal.). Robbins Geller attorneys obtained a $125 million settlement for the court-appointed lead plaintiff Water and Power Employees' Retirement, Disability and Death Plan of the City of Los Angeles and the class. The settlement resolved allegations that LendingClub promised investors an opportunity to get in on the ground floor of a revolutionary lending market fueled by the highest standards of honesty and integrity. The settlement ranked among the top ten largest securities recoveries ever in the Northern District of California.

- ***Knurr v. Orbital ATK, Inc.***, No. 1:16-cv-01031 (E.D. Va.). In the *Orbital* securities class action, Robbins Geller obtained court approval of a $108 million recovery for the class. The Firm succeeded in overcoming two successive motions to dismiss the case, and during discovery were required to file ten motions to compel, all of which were either negotiated to a resolution or granted in large part, which resulted in the production of critical evidence in support of plaintiffs' claims. Believed to be the fourth-largest securities class action settlement in the history of the Eastern District of Virginia, the settlement provides a recovery for investors that is more than ten times larger than the reported median recovery of estimated damages for all securities class action settlements in 2018.

- ***Hsu v. Puma Biotechnology***, No. SACV15-0865 (C.D. Cal.). After a two-week jury trial, Robbins Geller attorneys won a complete plaintiffs' verdict against both defendants on both claims, with the jury finding that Puma Biotechnology, Inc. and its CEO, Alan H. Auerbach, committed securities fraud. The Puma case is only the fifteenth securities class action case tried to a verdict since the Private Securities Litigation Reform Act was enacted in 1995.

- ***Marcus v. J.C. Penney Co., Inc.***, No. 13-cv-00736 (E.D. Tex.). Robbins Geller attorneys obtained a $97.5 million recovery on behalf of J.C. Penney shareholders. The result resolves claims that J.C. Penney and certain officers and directors made misstatements and/or omissions regarding the company's financial position that resulted in artificially inflated stock prices. Specifically, defendants failed to disclose and/or misrepresented adverse facts, including that J.C. Penney

would have insufficient liquidity to get through year-end and would require additional funds to make it through the holiday season, and that the company was concealing its need for liquidity so as not to add to its vendors' concerns.

- ***Monroe County Employees' Retirement System v. The Southern Company***, No. 1:17-cv-00241 (N.D. Ga.). As lead counsel, Robbins Geller obtained an $87.5 million settlement in a securities class action on behalf of plaintiffs Monroe County Employees' Retirement System and Roofers Local No. 149 Pension Fund. The settlement resolves claims for violations of the Securities Exchange Act of 1934 stemming from defendants' issuance of materially misleading statements and omissions regarding the status of construction of a first-of-its-kind "clean coal" power plant in Kemper County, Mississippi. Plaintiffs alleged that these misstatements caused The Southern Company's stock price to be artificially inflated during the class period. Prior to resolving the case, Robbins Geller uncovered critical documentary evidence and deposition testimony supporting plaintiffs' claims. In granting final approval of the settlement, the court praised Robbins Geller for its "hard-fought litigation in the Eleventh Circuit" and its "experience, reputation, and abilities of [its] attorneys," and highlighted that the firm is "well-regarded in the legal community, especially in litigating class-action securities cases

- ***Chicago Laborers Pension Fund v. Alibaba Grp. Holding Ltd.***, No. CIV535692 (Cal. Super. Ct., San Mateo Cnty.). Robbins Geller attorneys and co-counsel obtained a $75 million settlement in the Alibaba Group Holding Limited securities class action, resolving investors' claims that Alibaba violated the Securities Act of 1933 in connection with its September 2014 initial public offering. Chicago Laborers Pension Fund served as a plaintiff in the action.

- ***Luna v. Marvell Tech. Grp., Ltd.***, No. 3:15-cv-05447 (N.D. Cal.). In the *Marvell* litigation, Robbins Geller attorneys represented the Plumbers and Pipefitters National Pension Fund and obtained a $72.5 million settlement. The case involved claims that Marvell reported revenue and earnings during the class period that were misleading as a result of undisclosed pull-in and concession sales. The settlement represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors who purchased shares during the February 19, 2015 through December 7, 2015 class period.

- ***Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.***, No. 3:09-cv-00882 (M.D. Tenn.). In the *Psychiatric Solutions* case, Robbins Geller represented lead plaintiff and class representative Central States, Southeast and Southwest Areas Pension Fund in litigation spanning more than four years. Psychiatric Solutions and its top executives were accused of insufficiently staffing their in-patient hospitals, downplaying the significance of regulatory investigations and manipulating their malpractice reserves. Just days before trial was set to commence, attorneys from Robbins Geller achieved a $65 million settlement that was the fourth-largest securities recovery ever in the district and one of the largest in a decade.

- ***Plumbers & Pipefitters Nat'l Pension Fund v. Burns***, No. 3:05-cv-07393 (N.D. Ohio). After 11 years of hard-fought litigation, Robbins Geller attorneys secured a $64 million recovery for shareholders in a case that accused the former heads of Dana Corp. of securities fraud for trumpeting the auto parts maker's condition while it actually spiraled toward bankruptcy. The Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action.

- ***Villella v. Chemical and Mining Company of Chile Inc.***, No. 1:15-cv-02106 (S.D.N.Y.) Robbins Geller attorneys, serving as lead consel, obtained a $62.5 million settlement against Sociedad Química y Minera de Chile S.A. ("SQM"), a Chilean mining company. The case alleged that SQM violated the Securities Exchange Act of 1934 by issuing materially false and misleading statements

regarding the company's failure to disclose that money from SQM was channeled illegally to electoral campaigns for Chilean politicians and political parties as far back as 2009. SQM had also filed millions of dollars' worth of fictitious tax receipts with Chilean authorities in order to conceal bribery payments from at least 2009 through fiscal 2014. Due to the company being based out of Chile and subject to Chilean law and rules, the Robbins Geller litigation team put together a multilingual litigation team with Chilean expertise. Depositions are considered unlawful in the country of Chile, so Robbins Geller successfully moved the court to compel SQM to bring witnesses to the United States.

- ***In re BHP Billiton Ltd. Sec. Litig.***, No. 1:16-cv-01445 (S.D.N.Y.). As lead counsel, Robbins Geller obtained a $50 million class action settlement against BHP, a Australian-based mining company that was accused of failing to disclose significant safety problems at the Fundão iron-ore dam, in Brazil. The Firm achieved this result for lead plaintiffs City of Birmingham Retirement and Relief System and City of Birmingham Firemen's and Policemen's Supplemental Pension System, on behalf of purchasers of the American Depositary Shares ("ADRs") of defendants BHP Billiton Limited and BHP Billiton Plc (together, "BHP") from September 25, 2014 to November 30, 2015.

- ***In re St. Jude Med., Inc. Sec. Litig.***, No. 0:10-cv-00851 (D. Minn.). After four and a half years of litigation and mere weeks before the jury selection, Robbins Geller obtained a $50 million settlement on behalf of investors in medical device company St. Jude Medical. The settlement resolves accusations that St. Jude Medical misled investors by utilizing heavily discounted end-of-quarter bulk sales to meet quarterly expectations, which created a false picture of demand by increasing customer inventory due of St. Jude Medical devices. The complaint alleged that the risk of St. Jude Medical's reliance on such bulk sales manifested when it failed to meet its forecast guidance for the third quarter of 2009, which the company had reaffirmed only weeks earlier.

- ***Deka Investment GmbH v. Santander Consumer USA Holdings Inc.***, No. 3:15-cv-02129 (N.D. Tex.). Robbins Geller and co-counsel secured a $47 million settlement in a securities class action against Santander Consumer USA Holdings Inc. ("SCUSA"). The case alleges that SCUSA, 2 of its officers, 10 of its directors, as well as 17 underwriters of its January 23, 2014 multi-billion dollar IPO violated §§11, 12(a)(2), and 15 of the Securities Act of 1933 as a result of their negligence in connection with misrepresentations in the prospectus and registration statement for the IPO ("Offering Documents"). The complaint also alleged that SCUSA and two of its officers violated §§10(b) and 20(a) of the Securities Exchange Act of 1934 and Rule 10b-5 as a result of their fraud in issuing misleading statements in the IPO Offering Documents as well as in subsequent statements to investors.

- ***Snap Inc. Securities Cases***, JCCP No. 4960 (Cal. Super. Ct., Los Angeles Cnty). Robbins Geller, along with co-counsel, reached a settlement in the Snap, Inc. securities class action, providing for the payment of $32,812,500 to eligible settlement class members. The securities class action sought remedies under §§11, 12(a)(2) and 15 of the Securities Act of 1933. The case alleged that Snap, certain Snap officers and directors, and the underwriters for Snap's Initial Public Offering ("IPO") were liable for materially false and misleading statements and omissions in the Registration Statement for the IPO, related to trends and uncertainties in Snap's growth metrics, a potential patent-infringement action, and stated risk factors.

Robbins Geller's securities practice is also strengthened by the existence of a strong appellate department, whose collective work has established numerous legal precedents. The securities practice also utilizes an extensive group of in-house economic and damage analysts, investigators, and forensic accountants to aid in the prosecution of complex securities issues.

Shareholder Derivative and Corporate Governance Litigation

The Firm's shareholder derivative and corporate governance practice is focused on preserving corporate assets and enhancing long-term shareowner value. Shareowner derivative actions are often brought by institutional investors to vindicate the rights of the corporation injured by its executives' misconduct, which can effect violations of the nation's securities, anti-corruption, false claims, cyber-security, labor, environmental, and/or health & safety laws.

Robbins Geller attorneys have aided Firm clients in significantly enhancing shareowner value by obtaining hundreds of millions of dollars in financial clawbacks and successfully negotiating corporate governance enhancements. Robbins Geller has worked with its institutional clients to address corporate misconduct such as options backdating, bribery of foreign officials, pollution, off-label marketing, and insider trading and related self-dealing. Additionally, the Firm works closely with noted corporate governance consultants Robert Monks and Richard Bennett and their firm, ValueEdge Advisors LLC, to shape corporate governance practices that will benefit shareowners.

Robbins Geller's efforts have conferred substantial benefits upon shareowners, and the market effect of these benefits measures in the billions of dollars. The Firm's significant achievements include:

- ***City of Westland Police & Fire Ret. Sys. v. Stumpf (Wells Fargo Derivative Litigation)***, No. 3:11-cv-02369 (N.D. Cal.). Prosecuted shareholder derivative action on behalf of Wells Fargo & Co. alleging that Wells Fargo's executives allowed participation in the mass-processing of home foreclosure documents by engaging in widespread robo-signing, *i.e.*, the execution and submission of false legal documents in courts across the country without verification of their truth or accuracy, and failed to disclose Wells Fargo's lack of cooperation in a federal investigation into the bank's mortgage and foreclosure practices. In settlement of the action, Wells Fargo agreed to provide $67 million in homeowner down-payment assistance, credit counseling, and improvements to its mortgage servicing system. The initiatives will be concentrated in cities severely impacted by the bank's foreclosure practices and the ensuing mortgage foreclosure crisis. Additionally, Wells Fargo agreed to change its procedures for reviewing shareholder proposals and a strict ban on stock pledges by Wells Fargo board members.

- ***In re Ormat Techs., Inc. Derivative Litig.***, No. CV10-00759 (Nev. Dist. Ct., Washoe Cnty.). Robbins Geller brought derivative claims for breach of fiduciary duty and unjust enrichment against the directors and certain officers of Ormat Technologies, Inc., a leading geothermal and recovered energy power business. During the relevant time period, these Ormat insiders caused the company to engage in accounting manipulations that ultimately required restatement of the company's financial statements. The settlement in this action includes numerous corporate governance reforms designed to, among other things: (i) increase director independence; (ii) provide continuing education to directors; (iii) enhance the company's internal controls; (iv) make the company's board more independent; and (iv) strengthen the company's internal audit function.

- ***In re Alphatec Holdings, Inc. Derivative S'holder Litig.***, No. 37-2010-00058586 (Cal. Super. Ct., San Diego Cnty.). Obtained sweeping changes to Alphatec's governance, including separation of the Chairman and CEO positions, enhanced conflict of interest procedures to address related-party transactions, rigorous director independence standards requiring that at least a majority of directors be outside independent directors, and ongoing director education and training.

- ***In re Finisar Corp. Derivative Litig.***, No. C-06-07660 (N.D. Cal.). Prosecuted shareholder derivative action on behalf of Finisar against certain of its current and former directors and officers for engaging in an alleged nearly decade-long stock option backdating scheme that was

alleged to have inflicted substantial damage upon Finisar. After obtaining a reversal of the district court's order dismissing the complaint for failing to adequately allege that a pre-suit demand was futile, Robbins Geller lawyers successfully prosecuted the derivative claims to resolution obtaining over $15 million in financial clawbacks for Finisar. Robbins Geller attorneys also obtained significant changes to Finisar's stock option granting procedures and corporate governance. As a part of the settlement, Finisar agreed to ban the repricing of stock options without first obtaining specific shareholder approval, prohibit the retrospective selection of grant dates for stock options and similar awards, limit the number of other boards on which Finisar directors may serve, require directors to own a minimum amount of Finisar shares, annually elect a Lead Independent Director whenever the position of Chairman and CEO are held by the same person, and require the board to appoint a Trading Compliance officer responsible for ensuring compliance with Finisar's insider trading policies.

- ***Loizides v. Schramm (Maxwell Technology Derivative Litigation)***, No. 37-2010-00097953 (Cal. Super. Ct., San Diego Cnty.). Prosecuted shareholder derivative claims arising from the company's alleged violations of the Foreign Corrupt Practices Act of 1977 ("FCPA"). As a result of Robbins Geller's efforts, Maxwell insiders agreed to adopt significant changes in Maxwell's internal controls and systems designed to protect Maxwell against future potential violations of the FCPA. These corporate governance changes included establishing the following, among other things: a compliance plan to improve board oversight of Maxwell's compliance processes and internal controls; a clear corporate policy prohibiting bribery and subcontracting kickbacks, whereby individuals are accountable; mandatory employee training requirements, including the comprehensive explanation of whistleblower provisions, to provide for confidential reporting of FCPA violations or other corruption; enhanced resources and internal control and compliance procedures for the audit committee to act quickly if an FCPA violation or other corruption is detected; an FCPA and Anti-Corruption Compliance department that has the authority and resources required to assess global operations and detect violations of the FCPA and other instances of corruption; a rigorous ethics and compliance program applicable to all directors, officers, and employees, designed to prevent and detect violations of the FCPA and other applicable anti-corruption laws; an executive-level position of Chief Compliance Officer with direct board-level reporting responsibilities, who shall be responsible for overseeing and managing compliance issues within the company; a rigorous insider trading policy buttressed by enhanced review and supervision mechanisms and a requirement that all trades are timely disclosed; and enhanced provisions requiring that business entities are only acquired after thorough FCPA and anti-corruption due diligence by legal, accounting, and compliance personnel at Maxwell.

- ***In re SciClone Pharms., Inc. S'holder Derivative Litig.***, No. CIV 499030 (Cal. Super. Ct., San Mateo Cnty.). Robbins Geller attorneys successfully prosecuted the derivative claims on behalf of nominal party SciClone Pharmaceuticals, Inc., resulting in the adoption of state-of-the-art corporate governance reforms. The corporate governance reforms included the establishment of an FCPA compliance coordinator; the adoption of an FCPA compliance program and code; and the adoption of additional internal controls and compliance functions.

- ***Policemen & Firemen Ret. Sys. of the City of Detroit v. Cornelison (Halliburton Derivative Litigation)***, No. 2009-29987 (Tex. Dist. Ct., Harris Cnty.). Prosecuted shareholder derivative claims on behalf of Halliburton Company against certain Halliburton insiders for breaches of fiduciary duty arising from Halliburton's alleged violations of the FCPA. In the settlement, Halliburton agreed, among other things, to adopt strict intensive controls and systems designed to detect and deter the payment of bribes and other improper payments to foreign officials, to enhanced executive compensation clawback, director stock ownership requirements, a limitation on the number of other boards that Halliburton directors may serve, a lead director charter, enhanced director independence standards, and the creation of a management compliance committee.

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). In the *UnitedHealth* case, our client, CalPERS, obtained sweeping corporate governance improvements, including the election of a shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercises, as well as executive compensation reforms that tie pay to performance. In addition, the class obtained $925 million, the largest stock option backdating recovery ever and four times the next largest options backdating recovery.

- ***In re Fossil, Inc. Derivative Litig.***, No. 3:06-cv-01672 (N.D. Tex.). The settlement agreement included the following corporate governance changes: declassification of elected board members; retirement of three directors and addition of five new independent directors; two-thirds board independence requirements; corporate governance guidelines providing for "Majority Voting" election of directors; lead independent director requirements; revised accounting measurement dates of options; addition of standing finance committee; compensation clawbacks; director compensation standards; revised stock option plans and grant procedures; limited stock option granting authority, timing, and pricing; enhanced education and training; and audit engagement partner rotation and outside audit firm review.

- ***Pirelli Armstrong Tire Corp. Retiree Med. Benefits Tr. v. Sinegal (Costco Derivative Litigation)***, No. 2:08-cv-01450 (W.D. Wash.). The parties agreed to settlement terms providing for the following corporate governance changes: the amendment of Costco's bylaws to provide "Majority Voting" election of directors; the elimination of overlapping compensation and audit committee membership on common subject matters; enhanced Dodd-Frank requirements; enhanced internal audit standards and controls, and revised information-sharing procedures; revised compensation policies and procedures; revised stock option plans and grant procedures; limited stock option granting authority, timing, and pricing; and enhanced ethics compliance standards and training.

- ***In re F5 Networks, Inc. Derivative Litig.***, No. C-06-0794 (W.D. Wash.). The parties agreed to the following corporate governance changes as part of the settlement: revised stock option plans and grant procedures; limited stock option granting authority, timing, and pricing; "Majority Voting" election of directors; lead independent director requirements; director independence standards; elimination of director perquisites; and revised compensation practices.

- ***In re Community Health Sys., Inc. S'holder Derivative Litig.***, No. 3:11-cv-00489 (M.D. Tenn.). Robbins Geller obtained unprecedented corporate governance reforms on behalf of Community Health Systems, Inc. in a case against the company's directors and officers for breaching their fiduciary duties by causing Community Health to develop and implement admissions criteria that systematically steered patients into unnecessary inpatient admissions, in contravention of Medicare and Medicaid regulations. The governance reforms obtained as part of the settlement include two shareholder-nominated directors, the creation of a Healthcare Law Compliance Coordinator with

specified qualifications and duties, a requirement that the board's compensation committee be comprised solely of independent directors, the implementation of a compensation clawback that will automatically recover compensation improperly paid to the company's CEO or CFO in the event of a restatement, the establishment of an insider trading controls committee, and the adoption of a political expenditure disclosure policy. In addition to these reforms, $60 million in financial relief was obtained, which is the largest shareholder derivative recovery ever in Tennessee and the Sixth Circuit.

Options Backdating Litigation

As has been widely reported in the media, the stock options backdating scandal suddenly engulfed hundreds of publicly traded companies throughout the country in 2006. Robbins Geller was at the forefront of investigating and prosecuting options backdating derivative and securities cases. The Firm has recovered over $1 billion in damages on behalf of injured companies and shareholders.

- ***In re KLA-Tencor Corp. S'holder Derivative Litig.***, No. C-06-03445 (N.D. Cal.). After successfully opposing the special litigation committee of the board of directors' motion to terminate the derivative claims, Robbins Geller recovered $43.6 million in direct financial benefits for KLA-Tencor, including $33.2 million in cash payments by certain former executives and their directors' and officers' insurance carriers.

- ***In re Marvell Tech. Grp. Ltd. Derivative Litig.***, No. C-06-03894 (N.D. Cal.). Robbins Geller recovered $54.9 million in financial benefits, including $14.6 million in cash, for Marvell, in addition to extensive corporate governance reforms related to Marvell's stock option granting practices, board of directors' procedures, and executive compensation.

- ***In re KB Home S'holder Derivative Litig.***, No. 06-CV-05148 (C.D. Cal.). Robbins Geller served as co-lead counsel for the plaintiffs and recovered more than $31 million in financial benefits, including $21.5 million in cash, for KB Home, plus substantial corporate governance enhancements relating to KB Home's stock option granting practices, director elections, and executive compensation practices.

Corporate Takeover Litigation

Robbins Geller has earned a reputation as the leading law firm in representing shareholders in corporate takeover litigation. Through its aggressive efforts in prosecuting corporate takeovers, the Firm has secured for shareholders billions of dollars of additional consideration as well as beneficial changes for shareholders in the context of mergers and acquisitions.

The Firm regularly prosecutes merger and acquisition cases post-merger, often through trial, to maximize the benefit for its shareholder class. Some of these cases include:

- ***In re Tesla Motors, Inc. S'holder Litig.*,** No. 12711-VCS (Del. Ch.). Robbins Geller, along with co-counsel, secured a $60 million partial settlement after nearly four years of litigation against Tesla. This partial settlement is one of the largest derivative recoveries in a stockholder action challenging a merger. This partial settlement resolves the claims brought against defendants Kimbal Musk, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, Ira Ehrenpreis, and Robyn M. Denholm, but not the claims against defendant Elon Musk.

- ***In re Kinder Morgan, Inc. S'holders Litig.***, No. 06-C-801 (Kan. Dist. Ct., Shawnee Cnty.). In the largest recovery ever for corporate takeover class action litigation, the Firm negotiated a settlement fund of $200 million in 2010.

- ***In re Dole Food Co., Inc. S'holder Litig.***, No. 8703-VCL (Del. Ch.). Robbins Geller and co-counsel went to trial in the Delaware Court of Chancery on claims of breach of fiduciary duty on behalf of Dole Food Co., Inc. shareholders. The litigation challenged the 2013 buyout of Dole by its billionaire Chief Executive Officer and Chairman, David H. Murdock. On August 27, 2015, the court issued a post-trial ruling that Murdock and fellow director C. Michael Carter – who also served as Dole's General Counsel, Chief Operating Officer, and Murdock's top lieutenant – had engaged in fraud and other misconduct in connection with the buyout and are liable to Dole's former stockholders for over $148 million, the largest trial verdict ever in a class action challenging a merger transaction.

- ***Nieman v. Duke Energy Corp.***, No. 3:12-cv-00456 (W.D.N.C.). Robbins Geller, along with co-counsel, obtained a $146.25 million settlement on behalf of Duke Energy Corporation investors. The settlement resolves accusations that defendants misled investors regarding Duke's future leadership following its merger with Progress Energy, Inc., and specifically, their premeditated coup to oust William D. Johnson (CEO of Progress) and replace him with Duke's then-CEO, John Rogers. This historic settlement represents the largest recovery ever in a North Carolina securities fraud action, and one of the five largest recoveries in the Fourth Circuit.

- ***In re Rural Metro Corp. S'holders Litig.***, No. 6350-VCL (Del. Ch.). Robbins Geller and co-counsel were appointed lead counsel in this case after successfully objecting to an inadequate settlement that did not take into account evidence of defendants' conflicts of interest. In a post-trial opinion, Delaware Vice Chancellor J. Travis Laster found defendant RBC Capital Markets, LLC liable for aiding and abetting Rural/Metro's board of directors' fiduciary duty breaches in the $438 million buyout of Rural/Metro, citing "the magnitude of the conflict between RBC's claims and the evidence." RBC was ordered to pay nearly $110 million as a result of its wrongdoing, the largest damage award ever obtained against a bank over its role as a merger adviser. The Delaware Supreme Court issued a landmark opinion affirming the judgment on November 30, 2015, *RBC Cap. Mkts., LLC v. Jervis*, 129 A.3d 816 (Del. 2015).

- ***In re Del Monte Foods Co. S'holders Litig.***, No. 6027-VCL (Del. Ch.). Robbins Geller exposed the unseemly practice by investment bankers of participating on both sides of large merger and acquisition transactions and ultimately secured an $89 million settlement for shareholders of Del Monte. For efforts in achieving these results, the Robbins Geller lawyers prosecuting the case were named Attorneys of the Year by *California Lawyer* magazine in 2012.

- ***In re TD Banknorth S'holders Litig.***, No. 2557-VCL (Del. Ch.). After objecting to a modest recovery of just a few cents per share, the Firm took over the litigation and obtained a common fund settlement of $50 million.

- ***In re Chaparral Res., Inc. S'holders Litig.***, No. 2633-VCL (Del. Ch.). After a full trial and a subsequent mediation before the Delaware Chancellor, the Firm obtained a common fund settlement of $41 million (or 45% increase above merger price) for both class and appraisal claims.

- ***Laborers' Local #231 Pension Fund v. Websense, Inc.***, No. 37-2013-00050879-CU-BT-CTL (Cal. Super. Ct., San Diego Cnty.). Robbins Geller successfully obtained a record-breaking $40 million in *Websense*, which is believed to be the largest post-merger common fund settlement in California state court history. The class action challenged the May 2013 buyout of Websense by Vista Equity Partners (and affiliates) for $24.75 per share and alleged breach of fiduciary duty against the

former Websense board of directors, and aiding and abetting against Websense's financial advisor, Merrill Lynch, Pierce, Fenner & Smith, Inc. Claims were pursued by the plaintiff in both California state court and the Delaware Court of Chancery.

- ***In re Onyx Pharms., Inc. S'holder Litig.***, No. CIV523789 (Cal. Super. Ct., San Mateo Cnty.). Robbins Geller obtained $30 million in a case against the former Onyx board of directors for breaching its fiduciary duties in connection with the acquisition of Onyx by Amgen Inc. for $125 per share at the expense of shareholders. At the time of the settlement, it was believed to set the record for the largest post-merger common fund settlement in California state court history. Over the case's three years, Robbins Geller defeated defendants' motions to dismiss, obtained class certification, took over 20 depositions, and reviewed over one million pages of documents. Further, the settlement was reached just days before a hearing on defendants' motion for summary judgment was set to take place, and the result is now believed to be the second largest post-merger common fund settlement in California state court history.

- ***Harrah's Entertainment***, No. A529183 (Nev. Dist. Ct., Clark Cnty.). The Firm's active prosecution of the case on several fronts, both in federal and state court, assisted Harrah's shareholders in securing an additional $1.65 billion in merger consideration.

- ***In re Chiron S'holder Deal Litig.***, No. RG 05-230567 (Cal. Super. Ct., Alameda Cnty.). The Firm's efforts helped to obtain an additional $800 million in increased merger consideration for Chiron shareholders.

- ***In re Dollar Gen. Corp. S'holder Litig.***, No. 07MD-1 (Tenn. Cir. Ct., Davidson Cnty.). As lead counsel, the Firm secured a recovery of up to $57 million in cash for former Dollar General shareholders on the eve of trial.

- ***In re Prime Hosp., Inc. S'holders Litig.***, No. 652-N (Del. Ch.). The Firm objected to a settlement that was unfair to the class and proceeded to litigate breach of fiduciary duty issues involving a sale of hotels to a private equity firm. The litigation yielded a common fund of $25 million for shareholders.

- ***In re UnitedGlobalCom, Inc. S'holder Litig.***, No. 1012-VCS (Del. Ch.). The Firm secured a common fund settlement of $25 million just weeks before trial.

- ***In re eMachines, Inc. Merger Litig.***, No. 01-CC-00156 (Cal. Super. Ct., Orange Cnty.). After four years of litigation, the Firm secured a common fund settlement of $24 million on the brink of trial.

- ***In re PeopleSoft, Inc. S'holder Litig.***, No. RG-03100291 (Cal. Super. Ct., Alameda Cnty.). The Firm successfully objected to a proposed compromise of class claims arising from takeover defenses by PeopleSoft, Inc. to thwart an acquisition by Oracle Corp., resulting in shareholders receiving an increase of over $900 million in merger consideration.

- ***ACS S'holder Litig.***, No. CC-09-07377-C (Tex. Cty. Ct., Dallas Cnty.). The Firm forced ACS's acquirer, Xerox, to make significant concessions by which shareholders would not be locked out of receiving more money from another buyer.

Antitrust

Robbins Geller's antitrust practice focuses on representing businesses and individuals who have been the victims of price-fixing, unlawful monopolization, market allocation, tying, and other anti-competitive conduct. The Firm has taken a leading role in many of the largest federal and state price-fixing, monopolization, market allocation, and tying cases throughout the United States.

- ***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation***, MDL No. 1720 (E.D.N.Y.). Robbins Geller attorneys, serving as co-lead counsel on behalf of merchants, obtained a settlement amount of $5.54 billion. In approving the settlement, the court noted that Robbins Geller and co-counsel "demonstrated the utmost professionalism despite the demands of the extreme perseverance that this case has required, litigating on behalf of a class of over 12 million for over fourteen years, across a changing legal landscape, significant motion practice, and appeal and remand. Class counsel's pedigree and efforts alone speak to the quality of their representation."

- ***Dahl v. Bain Cap. Partners, LLC***, No. 07-cv-12388 (D. Mass). Robbins Geller attorneys served as co-lead counsel on behalf of shareholders in this antitrust action against the nation's largest private equity firms that colluded to restrain competition and suppress prices paid to shareholders of public companies in connection with leveraged buyouts. Robbins Geller attorneys recovered more than $590 million for the class from the private equity firm defendants, including Goldman Sachs Group Inc. and Carlyle Group LP.

- ***Alaska Elec. Pension Fund v. Bank of Am. Corp.***, No. 14-cv-07126 (S.D.N.Y.). Robbins Geller attorneys prosecuted antitrust claims against 14 major banks and broker ICAP plc who were alleged to have conspired to manipulate the ISDAfix rate, the key interest rate for a broad range of interest rate derivatives and other financial instruments in contravention of the competition laws. The class action was brought on behalf of investors and market participants who entered into interest rate derivative transactions between 2006 and 2013. Final approval has been granted to settlements collectively yielding $504.5 million from all defendants.

- ***In re Currency Conversion Fee Antitrust Litig.***, 01 MDL No. 1409 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel and recovered $336 million for a class of credit and debit cardholders. The court praised the Firm as "indefatigable," noting that the Firm's lawyers "vigorously litigated every issue against some of the ablest lawyers in the antitrust defense bar."

- ***In re SSA Bonds Antitrust Litig.***, No. 1:16-cv-03711 (S.D.N.Y.). Robbins Geller attorneys are serving as co-lead counsel in a case against several of the world's largest banks and the traders of certain specialized government bonds. They are alleged to have entered into a wide-ranging price-fixing and bid-rigging scheme costing pension funds and other investors hundreds of millions. To date, three of the more than a dozen corporate defendants have settled for $95.5 million.

- ***In re Aftermarket Auto. Lighting Prods. Antitrust Litig.***, 09 MDL No. 2007 (C.D. Cal.). Robbins Geller attorneys served as co-lead counsel in this multi-district litigation in which plaintiffs allege that defendants conspired to fix prices and allocate markets for automotive lighting products. The last defendants settled just before the scheduled trial, resulting in total settlements of more than $50 million. Commenting on the quality of representation, the court commended the Firm for "expend[ing] substantial and skilled time and efforts in an efficient manner to bring this action to conclusion."

- ***In re Dynamic Random Access Memory (DRAM) Antitrust Litig.***, 02 MDL No. 1486 (N.D. Cal.). Robbins Geller attorneys served on the executive committee in this multi-district class action in

which a class of purchasers of dynamic random access memory (or DRAM) chips alleged that the leading manufacturers of semiconductor products fixed the price of DRAM chips from the fall of 2001 through at least the end of June 2002. The case settled for more than $300 million.

- ***Microsoft I-V Cases***, JCCP No. 4106 (Cal. Super. Ct., San Francisco Cnty.). Robbins Geller attorneys served on the executive committee in these consolidated cases in which California indirect purchasers challenged Microsoft's illegal exercise of monopoly power in the operating system, word processing, and spreadsheet markets. In a settlement approved by the court, class counsel obtained an unprecedented $1.1 billion worth of relief for the business and consumer class members who purchased the Microsoft products.

Consumer Fraud and Privacy

In our consumer-based economy, working families who purchase products and services must receive truthful information so they can make meaningful choices about how to spend their hard-earned money. When financial institutions and other corporations deceive consumers or take advantage of unequal bargaining power, class action suits provide, in many instances, the only realistic means for an individual to right a corporate wrong.

Robbins Geller attorneys represent consumers around the country in a variety of important, complex class actions. Our attorneys have taken a leading role in many of the largest federal and state consumer fraud, privacy, environmental, human rights, and public health cases throughout the United States. The Firm is also actively involved in many cases relating to banks and the financial services industry, pursuing claims on behalf of individuals victimized by abusive telemarketing practices, abusive mortgage lending practices, market timing violations in the sale of variable annuities, and deceptive consumer credit lending practices in violation of the Truth-In-Lending Act. Below are a few representative samples of our robust, nationwide consumer and privacy practice.

- ***In re Nat'l Prescription Opiate Litig.*** Robbins Geller serves on the Plaintiffs' Executive Committee to spearhead more than 2,900 federal lawsuits brought on behalf of governmental entities and other plaintiffs in the sprawling litigation concerning the nationwide prescription opioid epidemic. In reporting on the selection of the lawyers to lead the case, *The National Law Journal* reported that "[t]he team reads like a 'Who's Who' in mass torts."

- ***Apple Inc. Device Performance Litigation***. Robbins Geller serves on the Plaintiffs' Executive Committee to advance judicial interests of efficiency and protect the interests of the proposed class in the *Apple* litigation. The case alleges Apple misrepresented its iPhone devices and the nature of updates to its mobile operating system (iOS), which allegedly included code that significantly reduced the performance of older-model iPhones and forced users to incur expenses replacing these devices or their batteries.

- ***In re EpiPen (Epinephrine Injection, USP) Mktg., Sales Pracs. & Antitrust Litig.*** Robbins Geller served as co-lead class counsel in a case against Mylan Pharmaceuticals and Pfizer alleging anti-competitive behavior that allowed the price of ubiquitous, life-saving EpiPen auto-injector devices to rise over 600%, resulting in inflated prices for American families. Two settlements totaling $609 million were reached after five years of litigation and weeks prior to trial.

- ***Cordova v. Greyhound Lines, Inc.*** Robbins Geller represented California bus passengers *pro bono* in a landmark consumer and civil rights case against Greyhound for subjecting them to discriminatory immigration raids. Robbins Geller achieved a watershed court ruling that a private company may be held liable under California law for allowing border patrol to harass and racially

profile its customers. The case heralds that Greyhound passengers do not check their rights and dignity at the bus door and has had an immediate impact, not only in California but nationwide. Within weeks of Robbins Geller filing the case, Greyhound added "know your rights" information to passengers to its website and on posters in bus stations around the country, along with adopting other business reforms.

- ***In re Volkswagen "Clean Diesel" Mktg., Sales Pracs., & Prods. Liab. Litig.*** As part of the Plaintiffs' Steering Committee, Robbins Geller reached a series of settlements on behalf of purchasers, lessees, and dealers that total well over $17 billion, the largest settlement in history, concerning illegal "defeat devices" that Volkswagen installed on many of its diesel-engine vehicles. The device tricked regulators into believing the cars were complying with emissions standards, while the cars were actually emitting between 10 and 40 times the allowable limit for harmful pollutants.

- ***In re Facebook Biometric Info. Privacy Litig.,*** No. 3:15-cv-03747 (N.D. Cal.). Robbins Geller served as co-lead class counsel in a cutting-edge certified class action, securing a record-breaking $650 million all-cash settlement, the largest privacy settlement in history. The case concerned Facebook's alleged privacy violations through its collection of its users' biometric identifiers without informed consent through its "Tag Suggestions" feature, which uses proprietary facial recognition software to extract from user-uploaded photographs the unique biometric identifiers (*i.e.*, graphical representations of facial features, also known as facial geometry) associated with people's faces and identify who they are. The Honorable James Donato called the settlement "a groundbreaking settlement in a novel area" and praised the unprecedented 22% claims rate as "pretty phenomenal" and "a pretty good day in class settlement history."

- ***Yahoo Data Breach Class Action***. Robbins Geller helped secure final approval of a $117.5 million settlement in a class action lawsuit against Yahoo, Inc. arising out of Yahoo's reckless disregard for the safety and security of its customers' personal, private information. In September 2016, Yahoo revealed that personal information associated with at least 500 million user accounts, including names, email addresses, telephone numbers, dates of birth, hashed passwords, and security questions and answers, was stolen from Yahoo's user database in late 2014. The company made another announcement in December 2016 that personal information associated with more than one billion user accounts was extracted in August 2013. Ten months later, Yahoo announced that the breach in 2013 actually affected all three billion existing accounts. This was the largest data breach in history, and caused severe financial and emotional damage to Yahoo account holders. In 2017, Robbins Geller was appointed to the Plaintiffs' Executive Committee charged with overseeing the litigation.

- ***Trump University***. After six and a half years of tireless litigation and on the eve of trial, Robbins Geller, serving as co-lead counsel, secured a historic recovery on behalf of Trump University students around the country. The settlement provides $25 million to approximately 7,000 consumers, including senior citizens who accessed retirement accounts and maxed out credit cards to enroll in Trump University. The extraordinary result means individual class members are eligible for upwards of $35,000 in restitution. The settlement resolves claims that President Donald J. Trump and Trump University violated federal and state laws by misleadingly marketing "Live Events" seminars and mentorships as teaching Trump's "real-estate techniques" through his "hand-picked" "professors" at his so-called "university." Robbins Geller represented the class on a *pro bono* basis.

- ***In re Morning Song Bird Food Litig.*** Robbins Geller obtained final approval of a settlement in a civil Racketeer Influenced and Corrupt Organizations Act consumer class action against The Scotts Miracle-Gro Company and its CEO James Hagedorn. The settlement of up to $85 million provides full refunds to consumers around the country and resolves claims that Scotts Miracle-Gro

knowingly sold wild bird food treated with pesticides that are hazardous to birds. In approving the settlement, Judge Houston commended Robbins Gellller's "skill and quality of work [as] extraordinary" and the case as "aggressively litigated." The Robbins Geller team battled a series of dismissal motions before achieving class certification for the plaintiffs in March 2017, with the court finding that "Plaintiffs would not have purchased the bird food if they knew it was poison." Defendants then appealed the class certification to the Ninth Circuit, which was denied, and then tried to have the claims from non-California class members thrown out, which was also denied.

- ***Bank Overdraft Fees Litigation***. The banking industry charges consumers exorbitant amounts for "overdraft" of their checking accounts, even if the customer did not authorize a charge beyond the available balance and even if the account would not have been overdrawn had the transactions been ordered chronologically as they occurred – that is, banks reorder transactions to maximize such fees. The Firm brought lawsuits against major banks to stop this practice and recover these false fees. These cases have recovered over $500 million thus far from a dozen banks and we continue to investigate other banks engaging in this practice.

- ***Visa and MasterCard Fees***. After years of litigation and a six-month trial, Robbins Geller attorneys won one of the largest consumer-protection verdicts ever awarded in the United States. The Firm's attorneys represented California consumers in an action against Visa and MasterCard for intentionally imposing and concealing a fee from cardholders. The court ordered Visa and MasterCard to return $800 million in cardholder losses, which represented 100% of the amount illegally taken, plus 2% interest. In addition, the court ordered full disclosure of the hidden fee.

- ***Sony Gaming Networks & Customer Data Security Breach Litigation.*** The Firm served as a member of the Plaintiffs' Steering Committee, helping to obtain a precedential opinion denying in part Sony's motion to dismiss plaintiffs' claims involving the breach of Sony's gaming network, leading to a $15 million settlement.

- ***Tobacco Litigation***. Robbins Geller attorneys have led the fight against Big Tobacco since 1991. As an example, Robbins Geller attorneys filed the case that helped get rid of Joe Camel, representing various public and private plaintiffs, including the State of Arkansas, the general public in California, the cities of San Francisco, Los Angeles, and Birmingham, 14 counties in California, and the working men and women of this country in the Union Pension and Welfare Fund cases that have been filed in 40 states. In 1992, Robbins Geller attorneys filed the first case in the country that alleged a conspiracy by the Big Tobacco companies.

- ***Garment Workers Sweatshop Litigation***. Robbins Geller attorneys represented a class of 30,000 garment workers who alleged that they had worked under sweatshop conditions in garment factories in Saipan that produced clothing for top U.S. retailers such as The Gap, Target, and J.C. Penney. In the first action of its kind, Robbins Geller attorneys pursued claims against the factories and the retailers alleging violations of RICO, the Alien Tort Claims Act, and the Law of Nations based on the alleged systemic labor and human rights abuses occurring in Saipan. This case was a companion to two other actions, one which alleged overtime violations by the garment factories under the Fair Labor Standards Act and local labor law, and another which alleged violations of California's Unfair Practices Law by the U.S. retailers. These actions resulted in a settlement of approximately $20 million that included a comprehensive monitoring program to address past violations by the factories and prevent future ones. The members of the litigation team were honored as Trial Lawyers of the Year by the Trial Lawyers for Public Justice in recognition of the team's efforts at bringing about the precedent-setting settlement of the actions.

- ***In re Intel Corp. CPU Mktg., Sales Pracs. & Prods. Liab. Litig.*** Robbins Geller serves on the Plaintiffs' Steering Committee in *Intel*, a massive multidistrict litigation pending in the United

States District Court for the District of Oregon. *Intel* concerns serious security vulnerabilities – known as "Spectre" and "Meltdown" – that infect nearly all of Intel's x86 processors manufactured and sold since 1995, the patching of which results in processing speed degradation of the impacted computer, server or mobile device.

- ***West Telemarketing Case***. Robbins Geller attorneys secured a $39 million settlement for class members caught up in a telemarketing scheme where consumers were charged for an unwanted membership program after purchasing Tae-Bo exercise videos. Under the settlement, consumers were entitled to claim between one and one-half to three times the amount of all fees they unknowingly paid.

- ***Dannon Activia®***. Robbins Geller attorneys secured the largest ever settlement for a false advertising case involving a food product. The case alleged that Dannon's advertising for its Activia® and DanActive® branded products and their benefits from "probiotic" bacteria were overstated. As part of the nationwide settlement, Dannon agreed to modify its advertising and establish a fund of up to $45 million to compensate consumers for their purchases of Activia® and DanActive®.

- ***Mattel Lead Paint Toys***. In 2006-2007, toy manufacturing giant Mattel and its subsidiary Fisher-Price announced the recall of over 14 million toys made in China due to hazardous lead and dangerous magnets. Robbins Geller attorneys filed lawsuits on behalf of millions of parents and other consumers who purchased or received toys for children that were marketed as safe but were later recalled because they were dangerous. The Firm's attorneys reached a landmark settlement for millions of dollars in refunds and lead testing reimbursements, as well as important testing requirements to ensure that Mattel's toys are safe for consumers in the future.

- ***Tenet Healthcare Cases***. Robbins Geller attorneys were co-lead counsel in a class action alleging a fraudulent scheme of corporate misconduct, resulting in the overcharging of uninsured patients by the Tenet chain of hospitals. The Firm's attorneys represented uninsured patients of Tenet hospitals nationwide who were overcharged by Tenet's admittedly "aggressive pricing strategy," which resulted in price gouging of the uninsured. The case was settled with Tenet changing its practices and making refunds to patients.

- ***Pet Food Products Liability Litigation***. Robbins Geller served as co-lead counsel in this massive, 100+ case products liability MDL in the District of New Jersey concerning the death of and injury to thousands of the nation's cats and dogs due to tainted pet food. The case settled for $24 million.

Human Rights, Labor Practices, and Public Policy

Robbins Geller attorneys have a long tradition of representing the victims of unfair labor practices and violations of human rights. These include:

- ***Does I v. The Gap, Inc.***, No. 01 0031 (D. N. Mar. I.). In this groundbreaking case, Robbins Geller attorneys represented a class of 30,000 garment workers who alleged that they had worked under sweatshop conditions in garment factories in Saipan that produced clothing for top U.S. retailers such as The Gap, Target, and J.C. Penney. In the first action of its kind, Robbins Geller attorneys pursued claims against the factories and the retailers alleging violations of RICO, the Alien Tort Claims Act, and the Law of Nations based on the alleged systemic labor and human rights abuses occurring in Saipan. This case was a companion to two other actions: ***Does I v. Advance Textile Corp.***, No. 99 0002 (D. N. Mar. I.), which alleged overtime violations by the garment factories

under the Fair Labor Standards Act and local labor law, and ***UNITE v. The Gap, Inc.***, No. 300474 (Cal. Super. Ct., San Francisco Cty.), which alleged violations of California's Unfair Practices Law by the U.S. retailers. These actions resulted in a settlement of approximately $20 million that included a comprehensive monitoring program to address past violations by the factories and prevent future ones. The members of the litigation team were honored as Trial Lawyers of the Year by the Trial Lawyers for Public Justice in recognition of the team's efforts at bringing about the precedent-setting settlement of the actions.

- ***Liberty Mutual Overtime Cases***, No. JCCP 4234 (Cal. Super. Ct., Los Angeles Cnty.). Robbins Geller attorneys served as co-lead counsel on behalf of 1,600 current and former insurance claims adjusters at Liberty Mutual Insurance Company and several of its subsidiaries. Plaintiffs brought the case to recover unpaid overtime compensation and associated penalties, alleging that Liberty Mutual had misclassified its claims adjusters as exempt from overtime under California law. After 13 years of complex and exhaustive litigation, Robbins Geller secured a settlement in which Liberty Mutual agreed to pay $65 million into a fund to compensate the class of claims adjusters for unpaid overtime. The Liberty Mutual action is one of a few claims adjuster overtime actions brought in California or elsewhere to result in a successful outcome for plaintiffs since 2004.

- ***Veliz v. Cintas Corp.***, No. 5:03-cv-01180 (N.D. Cal.). Brought against one of the nation's largest commercial laundries for violations of the Fair Labor Standards Act for misclassifying truck drivers as salesmen to avoid payment of overtime.

- ***Kasky v. Nike, Inc.***, 27 Cal. 4th 939 (2002). The California Supreme Court upheld claims that an apparel manufacturer misled the public regarding its exploitative labor practices, thereby violating California statutes prohibiting unfair competition and false advertising. The court rejected defense contentions that any misconduct was protected by the First Amendment, finding the heightened constitutional protection afforded to noncommercial speech inappropriate in such a circumstance.

Shareholder derivative litigation brought by Robbins Geller attorneys at times also involves stopping anti-union activities, including:

- ***Southern Pacific/Overnite***. A shareholder action stemming from several hundred million dollars in loss of value in the company due to systematic violations by Overnite of U.S. labor laws.

- ***Massey Energy***. A shareholder action against an anti-union employer for flagrant violations of environmental laws resulting in multi-million-dollar penalties.

- ***Crown Petroleum***. A shareholder action against a Texas-based oil company for self-dealing and breach of fiduciary duty while also involved in a union lockout.

Environment and Public Health

Robbins Geller attorneys have also represented plaintiffs in class actions related to environmental law. The Firm's attorneys represented, on a *pro bono* basis, the Sierra Club and the National Economic Development and Law Center as *amici curiae* in a federal suit designed to uphold the federal and state use of project labor agreements ("PLAs"). The suit represented a legal challenge to President Bush's Executive Order 13202, which prohibits the use of project labor agreements on construction projects receiving federal funds. Our *amici* brief in the matter outlined and stressed the significant environmental and socio-economic benefits associated with the use of PLAs on large-scale construction projects.

Attorneys with Robbins Geller have been involved in several other significant environmental cases, including:

- ***Public Citizen v. U.S. D.O.T.*** Robbins Geller attorneys represented a coalition of labor, environmental, industry, and public health organizations including Public Citizen, The International Brotherhood of Teamsters, California AFL-CIO, and California Trucking Industry in a challenge to a decision by the Bush administration to lift a Congressionally-imposed "moratorium" on cross-border trucking from Mexico on the basis that such trucks do not conform to emission controls under the Clean Air Act, and further, that the administration did not first complete a comprehensive environmental impact analysis as required by the National Environmental Policy Act. The suit was dismissed by the United States Supreme Court, the court holding that because the D.O.T. lacked discretion to prevent crossborder trucking, an environmental assessment was not required.

- ***Sierra Club v. AK Steel***. Brought on behalf of the Sierra Club for massive emissions of air and water pollution by a steel mill, including homes of workers living in the adjacent communities, in violation of the Federal Clean Air Act, the Resource Conservation Recovery Act, and the Clean Water Act.

- ***MTBE Litigation***. Brought on behalf of various water districts for befouling public drinking water with MTBE, a gasoline additive linked to cancer.

- ***Exxon Valdez***. Brought on behalf of fisherman and Alaska residents for billions of dollars in damages resulting from the greatest oil spill in U.S. history.

- ***Avila Beach***. A citizens' suit against UNOCAL for leakage from the oil company pipeline so severe it literally destroyed the town of Avila Beach, California.

Federal laws such as the Clean Water Act, the Clean Air Act, and the Resource Conservation and Recovery Act and state laws such as California's Proposition 65 exist to protect the environment and the public from abuses by corporate and government organizations. Companies can be found liable for negligence, trespass, or intentional environmental damage, be forced to pay for reparations, and to come into compliance with existing laws. Prominent cases litigated by Robbins Geller attorneys include representing more than 4,000 individuals suing for personal injury and property damage related to the Stringfellow Dump Site in Southern California, participation in the Exxon Valdez oil spill litigation, and litigation involving the toxic spill arising from a Southern Pacific train derailment near Dunsmuir, California.

Robbins Geller attorneys have led the fight against Big Tobacco since 1991. As an example, Robbins Geller attorneys filed the case that helped get rid of Joe Camel, representing various public and private plaintiffs, including the State of Arkansas, the general public in California, the cities of San Francisco, Los Angeles, and Birmingham, 14 counties in California, and the working men and women of this country in the Union Pension and Welfare Fund cases that have been filed in 40 states. In 1992, Robbins Geller attorneys filed the first case in the country that alleged a conspiracy by the Big Tobacco companies.

Pro Bono

Robbins Geller provides counsel to those unable to afford legal representation as part of a continuous and longstanding commitment to the communities in which it serves. Over the years the Firm has dedicated a considerable amount of time, energy, and a full range of its resources for many *pro bono* and charitable actions.

Robbins Geller has been honored for its *pro bono* efforts by the California State Bar (including a nomination for the President's Pro Bono Law Firm of the Year award) and the San Diego Volunteer Lawyer's Program, among others.

Some of the Firm's and its attorneys' *pro bono* and charitable actions include:

- Representing public school children and parents in Tennessee challenging the state's private school voucher law, known as the Education Savings Account (ESA) Pilot Program. Robbins Geller helped achieve favorable rulings enjoining implementation of the ESA for violating the Home Rule provision of the Tennessee Constitution, which prohibits the General Assembly from passing laws that target specific counties without local approval.

- Representing California bus passengers *pro bono* in a landmark consumer and civil rights case against Greyhound for subjecting them to discriminatory immigration raids. Robbins Geller achieved a watershed court ruling that a private company may be held liable under California law for allowing border patrol to harass and racially profile its customers. The case heralds that Greyhound passengers do not check their rights and dignity at the bus door and has had an immediate impact, not only in California but nationwide. Within weeks of Robbins Geller filing the case, Greyhound added "know your rights" information to passengers to its website and on posters in bus stations around the country, along with adopting other business reforms.

- Working with the Homeless Action Center (HAC) to provide no-cost, barrier-free, culturally competent legal representation that makes it possible for people who are homeless (or at risk of becoming homeless) to access social safety net programs that help restore dignity and provide sustainable income, healthcare, mental health treatment, and housing. Based in Oakland and Berkeley, the non-profit is the only program in the Bay Area that specializes in legal services to those who are chronically homeless. In 2016, HAC provided assistance to 1,403 men and 936 women, and 1,691 cases were completed. An additional 1,357 cases were still pending when the year ended. The results include 512 completed SSI cases with a success rate of 87%.

- Representing Trump University students in two class actions against President Donald J. Trump. The historic settlement provides $25 million to approximately 7,000 consumers. This means individual class members are eligible for upwards of $35,000 in restitution – an extraordinary result.

- Representing children diagnosed with Autism Spectrum Disorder, as well as children with significant disabilities, in New York to remedy flawed educational policies and practices that cause substantial harm to these and other similar children year after year.

- Representing 19 San Diego County children diagnosed with Autism Spectrum Disorder in their appeal of the San Diego Regional Center's termination of funding for a crucial therapy. The victory resulted in a complete reinstatement of funding and set a precedent that allows other children to obtain the treatments they need.

- Serving as Northern California and Hawaii District Coordinator for the United States Court of Appeals for the Ninth Circuit's Pro Bono program since 1993.

- Representing the Sierra Club and the National Economic Development and Law Center as *amici curiae* before the U.S. Supreme Court.

- Obtaining political asylum, after an initial application had been denied, for an impoverished Somali family whose ethnic minority faced systematic persecution and genocidal violence in Somalia, as well as forced female mutilation.

- Working with the ACLU in a class action filed on behalf of welfare applicants subject to San Diego County's "Project 100%" program. Relief was had when the County admitted that food-stamp eligibility could not hinge upon the Project 100% "home visits," and again when the district court ruled that unconsented "collateral contacts" violated state regulations. The decision was noted by the *Harvard Law Review*, *The New York Times*, and *The Colbert Report*.

- Filing numerous *amicus curiae* briefs on behalf of religious organizations and clergy that support civil rights, oppose government-backed religious-viewpoint discrimination, and uphold the American traditions of religious freedom and church-state separation.

- Serving as *amicus* counsel in a Ninth Circuit appeal from a Board of Immigration Appeals deportation decision. In addition to obtaining a reversal of the BIA's deportation order, the Firm consulted with the Federal Defenders' Office on cases presenting similar fact patterns, which resulted in a precedent-setting *en banc* decision from the Ninth Circuit resolving a question of state and federal law that had been contested and conflicted for decades.

PROMINENT CASES, PRECEDENT-SETTING DECISIONS, AND JUDICIAL COMMENDATIONS

Prominent Cases

Over the years, Robbins Geller attorneys have obtained outstanding results in some of the most notorious and well-known cases, frequently earning judicial commendations for the quality of their representation.

- ***In re Enron Corp. Sec. Litig.***, No. H-01-3624 (S.D. Tex.). Investors lost billions of dollars as a result of the massive fraud at Enron. In appointing Robbins Geller lawyers as sole lead counsel to represent the interests of Enron investors, the court found that the Firm's zealous prosecution and level of "insight" set it apart from its peers. Robbins Geller attorneys and lead plaintiff The Regents of the University of California aggressively pursued numerous defendants, including many of Wall Street's biggest banks, and successfully obtained settlements in excess of ***$7.2 billion*** for the benefit of investors. ***This is the largest securities class action recovery in history***.

  The court overseeing this action had utmost praise for Robbins Geller's efforts and stated that "[t]he experience, ability, and reputation of the attorneys of [Robbins Geller] is not disputed; it is one of the most successful law firms in securities class actions, if not the preeminent one, in the country." *In re Enron Corp. Sec., Derivative & "ERISA" Litig.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008).

  The court further commented: "[I]n the face of extraordinary obstacles, the skills, expertise, commitment, and tenacity of [Robbins Geller] in this litigation cannot be overstated. Not to be overlooked are the unparalleled results, . . . which demonstrate counsel's clearly superlative litigating and negotiating skills." *Id.* at 789.

  The court stated that the Firm's attorneys "are to be commended for their zealousness, their diligence, their perseverance, their creativity, the enormous breadth and depth of their investigations and analysis, and their expertise in all areas of securities law on behalf of the proposed class." *Id.*

  In addition, the court noted, "This Court considers [Robbins Geller] 'a lion' at the securities bar on the national level," noting that the Lead Plaintiff selected Robbins Geller because of the Firm's "outstanding reputation, experience, and success in securities litigation nationwide." *Id.* at 790.

  The court further stated that "Lead Counsel's fearsome reputation and successful track record undoubtedly were substantial factors in . . . obtaining these recoveries." *Id.*

  Finally, Judge Harmon stated: "As this Court has explained [this is] an extraordinary group of attorneys who achieved the largest settlement fund ever despite the great odds against them." *Id.* at 828.

- ***Jaffe v. Household Int'l, Inc.***, No. 02-C-05893 (N.D. Ill). As sole lead counsel, Robbins Geller obtained a record-breaking settlement of ***$1.575 billion*** after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a securities fraud verdict in favor of the class. In 2015, the Seventh Circuit Court of Appeals upheld the jury's verdict that defendants made false or misleading statements of material fact about the company's business practices and financial results, but remanded the case for a new trial on the issue of whether the individual defendants "made" certain false statements, whether those false statements caused plaintiffs' losses, and the amount of

damages. The parties reached an agreement to settle the case just hours before the retrial was scheduled to begin on June 6, 2016. ***The $1.575 billion settlement, approved in October 2016, is the largest ever following a securities fraud class action trial, the largest securities fraud settlement in the Seventh Circuit and the eighth-largest settlement ever in a post-PSLRA securities fraud case.*** According to published reports, the case was just the seventh securities fraud case tried to a verdict since the passage of the PSLRA.

In approving the settlement, the Honorable Jorge L. Alonso noted the team's "skill and determination" while recognizing that "Lead Counsel prosecuted the case vigorously and skillfully over 14 years against nine of the country's most prominent law firms" and "achieved an exceptionally significant recovery for the class." The court added that the team faced "significant hurdles" and "uphill battles" throughout the case and recognized that "[c]lass counsel performed a very high-quality legal work in the context of a thorny case in which the state of the law has been and is in flux." The court succinctly concluded that the settlement was "a spectacular result for the class." *Jaffe v. Household Int'l, Inc.*, No. 02-C-5892, 2016 U.S. Dist. LEXIS 156921, at *8 (N.D. Ill. Nov. 10, 2016); *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893, Transcript at 56, 65 (N.D. Ill. Oct. 20, 2016).

- ***In re Valeant Pharms. Int'l, Inc. Sec. Litig.***, No. 3:15-cv-07658 (D.N.J.). As sole lead counsel, Robbins Geller attorneys obtained a $1.2 billion settlement in the securities case that *Vanity Fair* reported as "the corporate scandal of its era" that had raised "fundamental questions about the functioning of our health-care system, the nature of modern markets, and the slippery slope of ethical rationalizations." The settlement resolves claims that defendants made false and misleading statements regarding Valeant's business and financial performance during the class period, attributing Valeant's dramatic growth in revenues and profitability to "innovative new marketing approaches" as part of a business model that was low risk and "durable and sustainable." *Valeant* is the largest securities class action settlement against a pharmaceutical manufacturer and the ninth largest ever.

- ***In re Am. Realty Cap. Props., Inc. Litig.***, No. 1:15-mc-00040 (S.D.N.Y.). As sole lead counsel, Robbins Geller attorneys zealously litigated the case arising out of ARCP's manipulative accounting practices and obtained a $1.025 billion settlement. For five years, the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages of any major PSLRA case prior to trial and includes the largest personal contributions by individual defendants in history.

  In approving the settlement, the Honorable Alvin K. Hellerstein lauded the Robbins Geller litigation team, noting: "My own observation is that plaintiffs' representation is adequate and that the role of lead counsel was fulfilled in an extremely fine fashion by [Robbins Geller]. At every juncture, the representations made to me were reliable, the arguments were cogent, and the representation of their client was zealous."

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). In the *UnitedHealth* case, Robbins Geller represented the California Public Employees' Retirement System ("CalPERS") and demonstrated its willingness to vigorously advocate for its institutional clients, even under the most difficult circumstances. For example, in 2006, the issue of high-level executives backdating stock options made national headlines. During that time, many law firms, including Robbins Geller, brought shareholder derivative lawsuits against the companies' boards of directors for breaches of their fiduciary duties or for improperly granting backdated options. Rather than pursuing a shareholder derivative case, the Firm filed a securities fraud class action against the company on behalf of CalPERS. In doing so, Robbins Geller faced significant and unprecedented legal

obstacles with respect to loss causation, *i.e.*, that defendants' actions were responsible for causing the stock losses. Despite these legal hurdles, Robbins Geller obtained an $895 million recovery on behalf of the UnitedHealth shareholders. Shortly after reaching the $895 million settlement with UnitedHealth, the remaining corporate defendants, including former CEO William A. McGuire, also settled. McGuire paid $30 million and returned stock options representing more than three million shares to the shareholders. The total recovery for the class was over $925 million, the largest stock option backdating recovery ever, and ***a recovery that is more than four times larger than the next largest options backdating recovery***. Moreover, Robbins Geller obtained unprecedented corporate governance reforms, including election of a shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercise, and executive compensation reforms that tie pay to performance.

- ***Alaska Elec. Pension Fund v. CitiGroup, Inc. (In re WorldCom Sec. Litig.)***, No. 03 Civ. 8269 (S.D.N.Y.). Robbins Geller attorneys represented more than 50 private and public institutions that opted out of the class action case and sued WorldCom's bankers, officers and directors, and auditors in courts around the country for losses related to WorldCom bond offerings from 1998 to 2001. The Firm's clients included major public institutions from across the country such as CalPERS, CalSTRS, the state pension funds of Maine, Illinois, New Mexico, and West Virginia, union pension funds, and private entities such as AIG and Northwestern Mutual. Robbins Geller attorneys recovered more than $650 million for their clients, substantially more than they would have recovered as part of the class.

- ***Luther v. Countrywide Fin. Corp.***, No. 12-cv-05125 (C.D. Cal.). Robbins Geller attorneys secured a $500 million settlement for institutional and individual investors in what is the largest RMBS purchaser class action settlement in history, and one of the largest class action securities settlements of all time. The unprecedented settlement resolves claims against Countrywide and Wall Street banks that issued the securities. The action was the first securities class action case filed against originators and Wall Street banks as a result of the credit crisis. As co-lead counsel Robbins Geller forged through six years of hard-fought litigation, oftentimes litigating issues of first impression, in order to secure the landmark settlement for its clients and the class.

  In approving the settlement, Judge Mariana R. Pfaelzer repeatedly complimented plaintiffs' attorneys, noting that it was "beyond serious dispute that Class Counsel has vigorously prosecuted the Settlement Actions on both the state and federal level over the last six years." Judge Pfaelzer also commented that "[w]ithout a settlement, these cases would continue indefinitely, resulting in significant risks to recovery and continued litigation costs. It is difficult to understate the risks to recovery if litigation had continued." *Me. State Ret. Sys. v. Countrywide Fin. Corp.*, No. 2:10-CV-00302, 2013 U.S. Dist. LEXIS 179190, at *44, *56 (C.D. Cal. Dec. 5, 2013).

  Judge Pfaelzer further noted that the proposed $500 million settlement represents one of the "largest MBS class action settlements to date. Indeed, this settlement easily surpasses the next largest . . . MBS settlement." *Id.* at *59.

- ***In re Wachovia Preferred Sec. & Bond/Notes Litig.***, No. 09-cv-06351 (S.D.N.Y.). In litigation over bonds and preferred securities, issued by Wachovia between 2006 and 2008, Robbins Geller and co-counsel obtained a significant settlement with Wachovia successor Wells Fargo & Company ($590 million) and Wachovia auditor KPMG LLP ($37 million). ***The total settlement – $627 million – is one of the largest credit-crisis settlements involving Securities Act claims and one of the 25 largest securities class action recoveries in history***. The settlement is also one of the biggest securities class action recoveries arising from the credit crisis.

As alleged in the complaint, the offering materials for the bonds and preferred securities misstated and failed to disclose the true nature and quality of Wachovia's mortgage loan portfolio, which exposed the bank and misled investors to tens of billions of dollars in losses on mortgage-related assets. In reality, Wachovia employed high-risk underwriting standards and made loans to subprime borrowers, contrary to the offering materials and their statements of "pristine credit quality." Robbins Geller served as co-lead counsel representing the City of Livonia Employees' Retirement System, Hawaii Sheet Metal Workers Pension Fund, and the investor class.

- ***In re Cardinal Health, Inc. Sec. Litig.***, No. C2-04-575 (S.D. Ohio). As sole lead counsel representing Cardinal Health shareholders, Robbins Geller obtained a recovery of $600 million for investors. On behalf of the lead plaintiffs, Amalgamated Bank, the New Mexico State Investment Council, and the California Ironworkers Field Trust Fund, the Firm aggressively pursued class claims and won numerous courtroom victories, including a favorable decision on defendants' motion to dismiss. *In re Cardinal Health, Inc. Sec. Litigs.*, 426 F. Supp. 2d 688 (S.D. Ohio 2006). At the time, the $600 million settlement was the tenth-largest settlement in the history of securities fraud litigation and is the largest-ever recovery in a securities fraud action in the Sixth Circuit. Judge Marbley commented: "[T]his is an extraordinary settlement relative to all the other settlements in cases of this nature and certainly cases of this magnitude. . . . This was an outstanding settlement. . . . [I]n most instances, if you've gotten four cents on the dollar, you've done well. You've gotten twenty cents on the dollar, so that's been extraordinary. *In re Cardinal Health, Inc. Sec. Litig.*, No. 2:04-CV-575, Transcript at 16, 32 (S.D. Ohio Oct. 19, 2007). Judge Marbley further stated:

> The quality of representation in this case was superb. Lead Counsel, [Robbins Geller], are nationally recognized leaders in complex securities litigation class actions. The quality of the representation is demonstrated by the substantial benefit achieved for the Class and the efficient, effective prosecution and resolution of this action. Lead Counsel defeated a volley of motions to dismiss, thwarting well-formed challenges from prominent and capable attorneys from six different law firms.

In re Cardinal Health Inc. Sec. Litigs., 528 F. Supp. 2d 752, 768 (S.D. Ohio 2007).

- ***AOL Time Warner Cases I & II***, JCCP Nos. 4322 & 4325 (Cal. Super. Ct., Los Angeles Cnty.). Robbins Geller represented The Regents of the University of California, six Ohio state pension funds, Rabo Bank (NL), the Scottish Widows Investment Partnership, several Australian public and private funds, insurance companies, and numerous additional institutional investors, both domestic and international, in state and federal court opt-out litigation stemming from Time Warner's disastrous 2001 merger with Internet high flier America Online. Robbins Geller attorneys exposed a massive and sophisticated accounting fraud involving America Online's e-commerce and advertising revenue. After almost four years of litigation involving extensive discovery, the Firm secured combined settlements for its opt-out clients totaling over $629 million just weeks before The Regents' case pending in California state court was scheduled to go to trial. The Regents' gross recovery of $246 million is the largest individual opt-out securities recovery in history.

- ***Abu Dhabi Commercial Bank v. Morgan Stanley & Co.***, No. 1:08-cv-07508-SAS-DCF (S.D.N.Y.), and ***King County, Washington v. IKB Deutsche Industriebank AG***, No. 1:09-cv-08387-SAS (S.D.N.Y.). The Firm represented multiple institutional investors in successfully pursuing recoveries from two failed structured investment vehicles, each of which had been rated "AAA" by Standard & Poors and Moody's, but which failed fantastically in 2007. The matter settled just prior to trial in 2013. This result was only made possible after Robbins Geller lawyers beat back the rating agencies' longtime argument that ratings were opinions protected by the First Amendment.

- ***In re HealthSouth Corp. Sec. Litig.***, No. CV-03-BE-1500-S (N.D. Ala.). As court-appointed co-lead counsel, Robbins Geller attorneys obtained a combined recovery of $671 million from HealthSouth, its auditor Ernst & Young, and its investment banker, UBS, for the benefit of stockholder plaintiffs. The settlement against HealthSouth represents one of the larger settlements in securities class action history and is considered among the top 15 settlements achieved after passage of the PSLRA. Likewise, the settlement against Ernst & Young is one of the largest securities class action settlements entered into by an accounting firm since the passage of the PSLRA. HealthSouth and its financial advisors perpetrated one of the largest and most pervasive frauds in the history of U.S. healthcare, prompting Congressional and law enforcement inquiry and resulting in guilty pleas of 16 former HealthSouth executives in related federal criminal prosecutions. In March 2009, Judge Karon Bowdre commented in the *HealthSouth* class certification opinion: "The court has had many opportunities since November 2001 to examine the work of class counsel and the supervision by the Class Representatives. The court finds both to be far more than adequate." *In re HealthSouth Corp. Sec. Litig.*, 257 F.R.D. 260, 275 (N.D. Ala. 2009).

- ***In re Facebook Biometric Info. Privacy Litig.,*** No. 3:15-cv-03747 (N.D. Cal.). Robbins Geller served as co-lead class counsel in a cutting-edge certified class action, securing a record-breaking $650 million all-cash settlement, the largest privacy settlement in history. The case concerned Facebook's alleged privacy violations through its collection of its users' biometric identifiers without informed consent through its "Tag Suggestions" feature, which uses proprietary facial recognition software to extract from user-uploaded photographs the unique biometric identifiers (*i.e.*, graphical representations of facial features, also known as facial geometry) associated with people's faces and identify who they are. The Honorable James Donato called the settlement "a groundbreaking settlement in a novel area" and praised the unprecedented 22% claims rate as "pretty phenomenal" and "a pretty good day in class settlement history."

- ***In re Dynegy Inc. Sec. Litig.***, No. H-02-1571 (S.D. Tex.). As sole lead counsel representing The Regents of the University of California and the class of Dynegy investors, Robbins Geller attorneys obtained a combined settlement of $474 million from Dynegy, Citigroup, Inc., and Arthur Andersen LLP for their involvement in a clandestine financing scheme known as Project Alpha. Given Dynegy's limited ability to pay, Robbins Geller attorneys structured a settlement (reached shortly before the commencement of trial) that maximized plaintiffs' recovery without bankrupting the company. Most notably, the settlement agreement provides that Dynegy will appoint two board members to be nominated by The Regents, which Robbins Geller and The Regents believe will benefit all of Dynegy's stockholders.

- ***Jones v. Pfizer Inc.***, No. 1:10-cv-03864 (S.D.N.Y.). Lead plaintiff Stichting Philips Pensioenfonds obtained a $400 million settlement on behalf of class members who purchased Pfizer common stock during the January 19, 2006 to January 23, 2009 class period. The settlement against Pfizer resolves accusations that it misled investors about an alleged off-label drug marketing scheme. As sole lead counsel, Robbins Geller attorneys helped achieve this exceptional result after five years of hard-fought litigation against the toughest and the brightest members of the securities defense bar by litigating this case all the way to trial.

In approving the settlement, United States District Judge Alvin K. Hellerstein commended the Firm, noting that "[w]ithout the quality and the toughness that you have exhibited, our society would not be as good as it is with all its problems. So from me to you is a vote of thanks for devoting yourself to this work and doing it well. . . . You did a really good job. Congratulations."

- ***In re Qwest Commc'ns Int'l, Inc. Sec. Litig.***, No. 01-cv-1451 (D. Colo.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased Qwest securities. In July 2001, the Firm filed the initial complaint in this action on behalf of its clients, long before any investigation into Qwest's financial statements was initiated by the SEC or Department of Justice. After five years of litigation, lead plaintiffs entered into a settlement with Qwest and certain individual defendants that provided a $400 million recovery for the class and created a mechanism that allowed the vast majority of class members to share in an additional $250 million recovered by the SEC. In 2008, Robbins Geller attorneys recovered an additional $45 million for the class in a settlement with defendants Joseph P. Nacchio and Robert S. Woodruff, the CEO and CFO, respectively, of Qwest during large portions of the class period.

- ***Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.***, No. 1:09-cv-03701 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel for a class of investors and obtained court approval of a $388 million recovery in nine 2007 residential mortgage-backed securities offerings issued by J.P. Morgan. The settlement represents, on a percentage basis, the largest recovery ever achieved in an MBS purchaser class action. The result was achieved after more than five years of hard-fought litigation and an extensive investigation. In granting approval of the settlement, the court stated the following about Robbins Geller attorneys litigating the case: "[T]here is no question in my mind that this is a very good result for the class and that the plaintiffs' counsel fought the case very hard with extensive discovery, a lot of depositions, several rounds of briefing of various legal issues going all the way through class certification."

- ***Smilovits v. First Solar, Inc.***, No. 2:12-cv-00555 (D. Ariz.). As sole lead counsel, Robbins Geller obtained a $350 million settlement in *Smilovits v. First Solar, Inc.* The settlement, which was reached after a long legal battle and on the day before jury selection, resolves claims that First Solar violated §§10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC Rule 10b-5. The settlement is the fifth-largest PSLRA settlement ever recovered in the Ninth Circuit.

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, No. 1:08-cv-10783 (S.D.N.Y.). As sole lead counsel, Robbins Geller obtained a $272 million settlement on behalf of Goldman Sachs' shareholders. The settlement concludes one of the last remaining mortgage-backed securities purchaser class actions arising out of the global financial crisis. The remarkable result was achieved following seven years of extensive litigation. After the claims were dismissed in 2010, Robbins Geller secured a landmark victory from the Second Circuit Court of Appeals that clarified the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of MBS investors. Specifically, the Second Circuit's decision rejected the concept of "tranche" standing and concluded that a lead plaintiff in an MBS class action has class standing to pursue claims on behalf of purchasers of other securities that were issued from the same registration statement and backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities.

  In approving the settlement, the Honorable Loretta A. Preska of the Southern District of New York complimented Robbins Geller attorneys, noting:

  > Counsel, thank you for your papers. They were, by the way, extraordinary papers in support of the settlement, and I will particularly note Professor Miller's declaration in which he details the procedural aspects of the case and then speaks

of plaintiffs' counsel's success in the Second Circuit essentially changing the law.

> I will also note what counsel have said, and that is that this case illustrates the proper functioning of the statute.
>
> * * *
>
> Counsel, you can all be proud of what you've done for your clients. You've done an extraordinarily good job.

NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co., No. 1:08-cv-10783, Transcript at 10-11 (S.D.N.Y. May 2, 2016).

- ***Schuh v. HCA Holdings, Inc.***, No. 3:11-cv-01033 (M.D. Tenn.). As sole lead counsel, Robbins Geller obtained a groundbreaking $215 million settlement for former HCA Holdings, Inc. shareholders – the largest securities class action recovery ever in Tennessee. Reached shortly before trial was scheduled to commence, the settlement resolves claims that the Registration Statement and Prospectus HCA filed in connection with the company's massive $4.3 billion 2011 IPO contained material misstatements and omissions. The recovery achieved represents more than 30% of the aggregate classwide damages, far exceeding the typical recovery in a securities class action. At the hearing on final approval of the settlement, the Honorable Kevin H. Sharp described Robbins Geller attorneys as "gladiators" and commented: "Looking at the benefit obtained, the effort that you had to put into it, [and] the complexity in this case . . . I appreciate the work that you all have done on this." *Schuh v. HCA Holdings, Inc.*, No. 3:11-CV-01033, Transcript at 12-13 (M.D. Tenn. Apr. 11, 2016).

- ***Silverman v. Motorola, Inc.***, No. 1:07-cv-04507 (N.D. Ill.). The Firm served as lead counsel on behalf of a class of investors in Motorola, ultimately recovering $200 million for investors just two months before the case was set for trial. This outstanding result was obtained despite the lack of an SEC investigation or any financial restatement. In May 2012, the Honorable Amy J. St. Eve of the Northern District of Illinois commented: "The representation that [Robbins Geller] provided to the class was significant, both in terms of quality and quantity." *Silverman v. Motorola, Inc.*, No. 07 C 4507, 2012 U.S. Dist. LEXIS 63477, at *11 (N.D. Ill. May 7, 2012), *aff'd*, 739 F.3d 956 (7th Cir. 2013).

  In affirming the district court's award of attorneys' fees, the Seventh Circuit noted that "no other law firm was willing to serve as lead counsel. Lack of competition not only implies a higher fee but also suggests that most members of the securities bar saw this litigation as too risky for their practices." *Silverman v. Motorola Sols., Inc.*, 739 F.3d 956, 958 (7th Cir. 2013).

- ***In re AT&T Corp. Sec. Litig.***, MDL No. 1399 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased AT&T common stock. The case charged defendants AT&T and its former Chairman and CEO, C. Michael Armstrong, with violations of the federal securities laws in connection with AT&T's April 2000 initial public offering of its wireless tracking stock, one of the largest IPOs in American history. After two weeks of trial, and on the eve of scheduled testimony by Armstrong and infamous telecom analyst Jack Grubman, defendants agreed to settle the case for $100 million. In granting approval of the settlement, the court stated the following about the Robbins Geller attorneys handling the case:

  > Lead Counsel are highly skilled attorneys with great experience in prosecuting complex securities action[s], and their professionalism and diligence displayed during [this] litigation substantiates this characterization. The Court notes that

> Lead Counsel displayed excellent lawyering skills through their consistent preparedness during court proceedings, arguments and the trial, and their well-written and thoroughly researched submissions to the Court. Undoubtedly, the attentive and persistent effort of Lead Counsel was integral in achieving the excellent result for the Class.

In re AT&T Corp. Sec. Litig., MDL No. 1399, 2005 U.S. Dist. LEXIS 46144, at *28-*29 (D.N.J. Apr. 25, 2005), *aff'd*, 455 F.3d 160 (3d Cir. 2006).

- ***In re Dollar Gen. Corp. Sec. Litig.***, No. 01-CV-00388 (M.D. Tenn.). Robbins Geller attorneys served as lead counsel in this case in which the Firm recovered $172.5 million for investors. The *Dollar General* settlement was the largest shareholder class action recovery ever in Tennessee.

- ***Carpenters Health & Welfare Fund v. Coca-Cola Co.***, No. 00-CV-2838 (N.D. Ga.). As co-lead counsel representing Coca-Cola shareholders, Robbins Geller attorneys obtained a recovery of $137.5 million after nearly eight years of litigation. Robbins Geller attorneys traveled to three continents to uncover the evidence that ultimately resulted in the settlement of this hard-fought litigation. The case concerned Coca-Cola's shipping of excess concentrate at the end of financial reporting periods for the sole purpose of meeting analyst earnings expectations, as well as the company's failure to properly account for certain impaired foreign bottling assets.

- ***Schwartz v. TXU Corp.***, No. 02-CV-2243 (N.D. Tex.). As co-lead counsel, Robbins Geller attorneys obtained a recovery of over $149 million for a class of purchasers of TXU securities. The recovery compensated class members for damages they incurred as a result of their purchases of TXU securities at inflated prices. Defendants had inflated the price of these securities by concealing the fact that TXU's operating earnings were declining due to a deteriorating gas pipeline and the failure of the company's European operations.

- ***In re Doral Fin. Corp. Sec. Litig.***, 05 MDL No. 1706 (S.D.N.Y.). In July 2007, the Honorable Richard Owen of the Southern District of New York approved the $129 million settlement, finding in his order:

> The services provided by Lead Counsel [Robbins Geller] were efficient and highly successful, resulting in an outstanding recovery for the Class without the substantial expense, risk and delay of continued litigation. Such efficiency and effectiveness supports the requested fee percentage.
>
> Cases brought under the federal securities laws are notably difficult and notoriously uncertain. . . . Despite the novelty and difficulty of the issues raised, Lead Plaintiffs' counsel secured an excellent result for the Class.
>
> . . . Based upon Lead Plaintiff's counsel's diligent efforts on behalf of the Class, as well as their skill and reputations, Lead Plaintiff's counsel were able to negotiate a very favorable result for the Class. . . . The ability of [Robbins Geller] to obtain such a favorable partial settlement for the Class in the face of such formidable opposition confirms the superior quality of their representation . . . .

In re Doral Fin. Corp. Sec. Litig., No. 1:05-md-01706, Order at 4-5 (S.D.N.Y. July 17, 2007).

- ***In re Exxon Valdez***, No. A89 095 Civ. (D. Alaska), and ***In re Exxon Valdez Oil Spill Litig.***, No. 3 AN 89 2533 (Alaska Super. Ct., 3d Jud. Dist.). Robbins Geller attorneys served on the Plaintiffs' Coordinating Committee and Plaintiffs' Law Committee in this massive litigation resulting from

the Exxon Valdez oil spill in Alaska in March 1989. The jury awarded hundreds of millions in compensatory damages, as well as $5 billion in punitive damages (the latter were later reduced by the U.S. Supreme Court to $507 million).

- ***Mangini v. R.J. Reynolds Tobacco Co.***, No. 939359 (Cal. Super. Ct., San Francisco Cnty.). In this case, R.J. Reynolds admitted that "the *Mangini* action, and the way that it was vigorously litigated, was an early, significant and unique driver of the overall legal and social controversy regarding underage smoking that led to the decision to phase out the Joe Camel Campaign."

- ***Does I v. The Gap, Inc.***, No. 01 0031 (D. N. Mar. I.). In this groundbreaking case, Robbins Geller attorneys represented a class of 30,000 garment workers who alleged that they had worked under sweatshop conditions in garment factories in Saipan that produced clothing for top U.S. retailers such as The Gap, Target, and J.C. Penney. In the first action of its kind, Robbins Geller attorneys pursued claims against the factories and the retailers alleging violations of RICO, the Alien Tort Claims Act, and the Law of Nations based on the alleged systemic labor and human rights abuses occurring in Saipan. This case was a companion to two other actions: ***Does I v. Advance Textile Corp.***, No. 99 0002 (D. N. Mar. I.), which alleged overtime violations by the garment factories under the Fair Labor Standards Act and local labor law, and ***UNITE v. The Gap, Inc.***, No. 300474 (Cal. Super. Ct., San Francisco Cty.), which alleged violations of California's Unfair Practices Law by the U.S. retailers. These actions resulted in a settlement of approximately $20 million that included a comprehensive monitoring program to address past violations by the factories and prevent future ones. The members of the litigation team were honored as Trial Lawyers of the Year by the Trial Lawyers for Public Justice in recognition of the team's efforts in bringing about the precedent-setting settlement of the actions.

- ***Hall v. NCAA (Restricted Earnings Coach Antitrust Litigation)***, No. 94-2392 (D. Kan.). Robbins Geller attorneys were lead counsel and lead trial counsel for one of three classes of coaches in these consolidated price-fixing actions against the National Collegiate Athletic Association. On May 4, 1998, the jury returned verdicts in favor of the three classes for more than $70 million.

- ***In re Prison Realty Sec. Litig.***, No. 3:99-0452 (M.D. Tenn.). Robbins Geller attorneys served as lead counsel for the class, obtaining a $105 million recovery.

- ***In re Honeywell Int'l, Inc. Sec. Litig.***, No. 00-cv-03605 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased Honeywell common stock. The case charged Honeywell and its top officers with violations of the federal securities laws, alleging the defendants made false public statements concerning Honeywell's merger with Allied Signal, Inc. and that defendants falsified Honeywell's financial statements. After extensive discovery, Robbins Geller attorneys obtained a $100 million settlement for the class.

- ***Schwartz v. Visa Int'l***, No. 822404-4 (Cal. Super. Ct., Alameda Cnty.). After years of litigation and a six-month trial, Robbins Geller attorneys won one of the largest consumer protection verdicts ever awarded in the United States. Robbins Geller attorneys represented California consumers in an action against Visa and MasterCard for intentionally imposing and concealing a fee from their cardholders. The court ordered Visa and MasterCard to return $800 million in cardholder losses, which represented 100% of the amount illegally taken, plus 2% interest. In addition, the court ordered full disclosure of the hidden fee.

- ***Thompson v. Metro. Life Ins. Co.***, No. 00-cv-5071 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel and obtained $145 million for the class in a settlement involving racial discrimination claims in the sale of life insurance.

- ***In re Prudential Ins. Co. of Am. Sales Pracs. Litig.***, MDL No. 1061 (D.N.J.). In one of the first cases of its kind, Robbins Geller attorneys obtained a settlement of $4 billion for deceptive sales practices in connection with the sale of life insurance involving the "vanishing premium" sales scheme.

Precedent-Setting Decisions

Robbins Geller attorneys operate at the vanguard of complex class action of litigation. Our work often changes the legal landscape, resulting in an environment that is more-favorable for obtaining recoveries for our clients.

- ***Stoyas v. Toshiba Corp.***, 896 F.3d 933 (9th Cir. 2018), *cert. denied*, 588 U.S. __ (2019). In July 2018, the Ninth Circuit ruled in plaintiffs' favor in the *Toshiba* securities class action. Following appellate briefing and oral argument by Robbins Geller attorneys, a three-judge Ninth Circuit panel reversed the district court's prior dismissal in a unanimous, 36-page opinion, holding that Toshiba ADRs are a "security" and the Securities Exchange Act of 1934 could apply to those ADRs that were purchased in a domestic transaction. *Id.* at 939, 949. The court adopted the Second and Third Circuits' "irrevocable liability" test for determining whether the transactions were domestic and held that plaintiffs must be allowed to amend their complaint to allege that the purchase of Toshiba ADRs on the over-the-counter market was a domestic purchase and that the alleged fraud was in connection with the purchase.

- ***Cyan, Inc. v. Beaver Cnty. Emps. Ret. Fund***, No. 15-1439 (U.S.). In March 2018, the U.S. Supreme Court ruled in favor of investors represented by Robbins Geller, holding that state courts continue to have jurisdiction over class actions asserting violations of the Securities Act of 1933. The court's ruling secures investors' ability to bring Securities Act actions when companies fail to make full and fair disclosure of relevant information in offering documents. The court confirmed that the Securities Litigation Uniform Standards Act of 1998 was designed to preclude securities class actions asserting violations of state law – not to preclude securities actions asserting federal law violations brought in state courts.

- ***Mineworkers' Pension Scheme v. First Solar Inc.***, 881 F.3d 750 (9th Cir. 2018), *cert. denied*, 588 U.S. __ (2019). In January 2018, the Ninth Circuit upheld the district court's denial of defendants' motion for summary judgment, agreeing with plaintiffs that the test for loss causation in the Ninth Circuit is a general "proximate cause test," and rejecting the more stringent revelation of the fraudulent practices standard advocated by the defendants. The opinion is a significant victory for investors, as it forecloses defendants' ability to immunize themselves from liability simply by refusing to publicly acknowledge their fraudulent conduct.

- ***In re Quality Sys., Inc. Sec. Litig.***, No. 15-55173 (9th Cir.). In July 2017, Robbins Geller's Appellate Practice Group scored a significant win in the Ninth Circuit in the *Quality Systems* securities class action. On appeal, a three-judge Ninth Circuit panel unanimously reversed the district court's prior dismissal of the action against Quality Systems and remanded the case to the district court for further proceedings. The decision addressed an issue of first impression concerning "mixed" future and present-tense misstatements. The appellate panel explained that "non-forward-looking portions of mixed statements are not eligible for the safe harbor provisions of the PSLRA . . . . Defendants made a number of mixed statements that included projections of growth in revenue and earnings based on the state of QSI's sales pipeline." The panel then held *both* the non-forward-looking and forward-looking statements false and misleading and made with scienter, deeming them actionable. Later, although defendants sought rehearing by the Ninth Circuit sitting *en banc*, the circuit court denied their petition.

- ***Local 703, I.B. of T. Grocery & Food Emps. Welfare Fund v. Regions Fin. Corp.***, No. CV-10-J-2847-S (N.D. Ala.). In the *Regions Financial* securities class action, Robbins Geller represented Local 703, I.B. of T. Grocery and Food Employees Welfare Fund and obtained a $90 million settlement in September 2015 on behalf of purchasers of Regions Financial common stock during the class period. In August 2014, the Eleventh Circuit Court of Appeals affirmed the district court's decision to certify a class action based upon alleged misrepresentations about Regions Financial's financial health before and during the recent economic recession, and in November 2014, the U.S. District Court for the Northern District of Alabama denied defendants' third attempt to avoid plaintiffs' motion for class certification.

- ***Omnicare, Inc. v. Laborers Dist. Council Constr. Indus. Pension Fund***, No. 13-435 (U.S.). In March 2015, the U.S. Supreme Court ruled in favor of investors represented by Robbins Geller that investors asserting a claim under §11 of the Securities Act of 1933 with respect to a misleading statement of opinion do not, as defendant Omnicare had contended, have to prove that the statement was subjectively disbelieved when made. Rather, the court held that a statement of opinion may be actionable either because it was not believed, or because it lacked a reasonable basis in fact. This decision is significant in that it resolved a conflict among the federal circuit courts and expressly overruled the Second Circuit's widely followed, more stringent pleading standard for §11 claims involving statements of opinion. The Supreme Court remanded the case back to the district court for determination under the newly articulated standard. In August of 2016, upon remand, the district court applied the Supreme Court's new test and denied defendants' motion to dismiss in full.

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, 693 F.3d 145 (2d Cir. 2012). In a securities fraud action involving mortgage-backed securities, the Second Circuit rejected the concept of "tranche" standing and found that a lead plaintiff has class standing to pursue claims on behalf of purchasers of securities that were backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities. The court noted that, given those common lenders, the lead plaintiff's claims as to its purchases implicated "the same set of concerns" that purchasers in several of the other offerings possessed. The court also rejected the notion that the lead plaintiff lacked standing to represent investors in different tranches.

- ***In re VeriFone Holdings, Inc. Sec. Litig.***, 704 F.3d 694 (9th Cir. 2012). The panel reversed in part and affirmed in part the dismissal of investors' securities fraud class action alleging violations of §§10(b), 20(a), and 20A of the Securities Exchange Act of 1934 and SEC Rule 10b-5 in connection with a restatement of financial results of the company in which the investors had purchased stock.

  The panel held that the third amended complaint adequately pleaded the §10(b), §20A, and Rule 10b-5 claims. Considering the allegations of scienter holistically, as the U.S. Supreme Court directed in *Matrixx Initiatives, Inc. v. Siracusano*, 563 U.S 27, 48-49 (2011), the panel concluded that the inference that the defendant company and its chief executive officer and former chief financial officer were deliberately reckless as to the truth of their financial reports and related public statements following a merger was at least as compelling as any opposing inference.

- ***Fox v. JAMDAT Mobile, Inc.***, 185 Cal. App. 4th 1068 (2010). Concluding that Delaware's shareholder ratification doctrine did not bar the claims, the California Court of Appeal reversed dismissal of a shareholder class action alleging breach of fiduciary duty in a corporate merger.

- ***In re Constar Int'l Inc. Sec. Litig.***, 585 F.3d 774 (3d Cir. 2009). The Third Circuit flatly rejected defense contentions that where relief is sought under §11 of the Securities Act of 1933, which imposes liability when securities are issued pursuant to an incomplete or misleading registration statement, class certification should depend upon findings concerning market efficiency and loss causation.

- ***Matrixx Initiatives, Inc. v. Siracusano***, 563 U.S 27 (2011), *aff'g* 585 F.3d 1167 (9th Cir. 2009). In a securities fraud action involving the defendants' failure to disclose a possible link between the company's popular cold remedy and a life-altering side effect observed in some users, the U.S. Supreme Court unanimously affirmed the Ninth Circuit's (a) rejection of a bright-line "statistical significance" materiality standard, and (b) holding that plaintiffs had successfully pleaded a strong inference of the defendants' scienter.

- ***Alaska Elec. Pension Fund v. Flowserve Corp.***, 572 F.3d 221 (5th Cir. 2009). Aided by former U.S. Supreme Court Justice O'Connor's presence on the panel, the Fifth Circuit reversed a district court order denying class certification and also reversed an order granting summary judgment to defendants. The court held that the district court applied an incorrect fact-for-fact standard of loss causation, and that genuine issues of fact on loss causation precluded summary judgment.

- ***In re F5 Networks, Inc., Derivative Litig.***, 207 P.3d 433 (Wash. 2009). In a derivative action alleging unlawful stock option backdating, the Supreme Court of Washington ruled that shareholders need not make a pre-suit demand on the board of directors where this step would be futile, agreeing with plaintiffs that favorable Delaware case law should be followed as persuasive authority.

- ***Lormand v. US Unwired, Inc.***, 565 F.3d 228 (5th Cir. 2009). In a rare win for investors in the Fifth Circuit, the court reversed an order of dismissal, holding that safe harbor warnings were not meaningful when the facts alleged established a strong inference that defendants knew their forecasts were false. The court also held that plaintiffs sufficiently alleged loss causation.

- ***Institutional Inv'rs Grp. v. Avaya, Inc.***, 564 F.3d 242 (3d Cir. 2009). In a victory for investors in the Third Circuit, the court reversed an order of dismissal, holding that shareholders pled with particularity why the company's repeated denials of price discounts on products were false and misleading when the totality of facts alleged established a strong inference that defendants knew their denials were false.

- ***Alaska Elec. Pension Fund v. Pharmacia Corp.***, 554 F.3d 342 (3d Cir. 2009). The Third Circuit held that claims filed for violation of §10(b) of the Securities Exchange Act of 1934 were timely, adopting investors' argument that because scienter is a critical element of the claims, the time for filing them cannot begin to run until the defendants' fraudulent state of mind should be apparent.

- ***Rael v. Page***, 222 P.3d 678 (N.M. Ct. App. 2009). In this shareholder class and derivative action, Robbins Geller attorneys obtained an appellate decision reversing the trial court's dismissal of the complaint alleging serious director misconduct in connection with the merger of SunCal Companies and Westland Development Co., Inc., a New Mexico company with large and historic landholdings and other assets in the Albuquerque area. The appellate court held that plaintiff's claims for breach of fiduciary duty were direct, not derivative, because they constituted an attack on the validity or fairness of the merger and the conduct of the directors. Although New Mexico law had not addressed this question directly, at the urging of the Firm's attorneys, the court relied on Delaware law for guidance, rejecting the "special injury" test for determining the direct versus derivative inquiry and instead applying more recent Delaware case law.

- ***Lane v. Page***, No. 06-cv-1071 (D.N.M. 2012). In May 2012, while granting final approval of the settlement in the federal component of the Westland cases, Judge Browning in the District of New Mexico commented:

> Class Counsel are highly skilled and specialized attorneys who use their substantial experience and expertise to prosecute complex securities class actions. In possibly one of the best known and most prominent recent securities cases, Robbins Geller served as sole lead counsel – *In re Enron Corp. Sec. Litig.*, No. H-01-3624 (S.D. Tex.). *See* Report at 3. The Court has previously noted that the class would "receive high caliber legal representation" from class counsel, and throughout the course of the litigation the Court has been impressed with the quality of representation on each side. *Lane v. Page*, 250 F.R.D. at 647.

Lane v. Page, 862 F. Supp. 2d 1182, 1253-54 (D.N.M. 2012).

In addition, Judge Browning stated: "'Few plaintiffs' law firms could have devoted the kind of time, skill, and financial resources over a five-year period necessary to achieve the pre- and post-Merger benefits obtained for the class here.' . . . [Robbins Geller is] both skilled and experienced, and used those skills and experience for the benefit of the class [Robbins Geller is] both skilled and experienced, and used those skills and experience for the benefit of the class." *Id.* at 1254.

- ***Luther v. Countrywide Home Loans Servicing LP***, 533 F.3d 1031 (9th Cir. 2008). In a case of first impression, the Ninth Circuit held that the Securities Act of 1933's specific non-removal features had not been trumped by the general removal provisions of the Class Action Fairness Act of 2005.

- ***In re Gilead Scis. Sec. Litig.***, 536 F.3d 1049 (9th Cir. 2008). The Ninth Circuit upheld defrauded investors' loss causation theory as plausible, ruling that a limited temporal gap between the time defendants' misrepresentation was publicly revealed and the subsequent decline in stock value was reasonable where the public had not immediately understood the impact of defendants' fraud.

- ***In re WorldCom Sec. Litig.***, 496 F.3d 245 (2d Cir. 2007). The Second Circuit held that the filing of a class action complaint tolls the limitations period for all members of the class, including those who choose to opt out of the class action and file their own individual actions without waiting to see whether the district court certifies a class – reversing the decision below and effectively overruling multiple district court rulings that *American Pipe* tolling did not apply under these circumstances.

- ***In re Merck & Co. Sec., Derivative & ERISA Litig.***, 493 F.3d 393 (3d Cir. 2007). In a shareholder derivative suit appeal, the Third Circuit held that the general rule that discovery may not be used to supplement demand-futility allegations does not apply where the defendants enter a voluntary stipulation to produce materials relevant to demand futility without providing for any limitation as to their use. In April 2007, the Honorable D. Brooks Smith praised Robbins Geller partner Joe Daley's efforts in this litigation:

> Thank you very much Mr. Daley and a thank you to all counsel. As Judge Cowen mentioned, this was an exquisitely well-briefed case; it was also an extremely well-argued case, and we thank counsel for their respective jobs here in the matter, which we will take under advisement. Thank you.

In re Merck & Co., Inc. Sec., Derivative & ERISA Litig., No. 06-2911, Transcript at 35:37-36:00 (3d Cir. Apr. 12, 2007).

- ***Alaska Elec. Pension Fund v. Brown***, 941 A.2d 1011 (Del. 2007). The Supreme Court of Delaware held that the Alaska Electrical Pension Fund, for purposes of the "corporate benefit" attorney-fee doctrine, was presumed to have caused a substantial increase in the tender offer price paid in a "going private" buyout transaction. The Court of Chancery originally ruled that Alaska's counsel, Robbins Geller, was not entitled to an award of attorney fees, but Delaware's high court, in its published opinion, reversed and remanded for further proceedings.

- ***Crandon Cap. Partners v. Shelk***, 157 P.3d 176 (Or. 2007). Oregon's Supreme Court ruled that a shareholder plaintiff in a derivative action may still seek attorney fees even if the defendants took actions to moot the underlying claims. The Firm's attorneys convinced Oregon's highest court to take the case, and reverse, despite the contrary position articulated by both the trial court and the Oregon Court of Appeals.

- ***In re Qwest Commc'ns Int'l***, 450 F.3d 1179 (10th Cir. 2006). In a case of first impression, the Tenth Circuit held that a corporation's deliberate release of purportedly privileged materials to governmental agencies was not a "selective waiver" of the privileges such that the corporation could refuse to produce the same materials to non-governmental plaintiffs in private securities fraud litigation.

- ***In re Guidant S'holders Derivative Litig.***, 841 N.E.2d 571 (Ind. 2006). Answering a certified question from a federal court, the Supreme Court of Indiana unanimously held that a pre-suit demand in a derivative action is excused if the demand would be a futile gesture. The court adopted a "demand futility" standard and rejected defendants' call for a "universal demand" standard that might have immediately ended the case.

- ***Denver Area Meat Cutters v. Clayton***, 209 S.W.3d 584 (Tenn. Ct. App. 2006). The Tennessee Court of Appeals rejected an objector's challenge to a class action settlement arising out of Warren Buffet's 2003 acquisition of Tennessee-based Clayton Homes. In their effort to secure relief for Clayton Homes stockholders, the Firm's attorneys obtained a temporary injunction of the Buffet acquisition for six weeks in 2003 while the matter was litigated in the courts. The temporary halt to Buffet's acquisition received national press attention.

- ***DeJulius v. New Eng. Health Care Emps. Pension Fund***, 429 F.3d 935 (10th Cir. 2005). The Tenth Circuit held that the multi-faceted notice of a $50 million settlement in a securities fraud class action had been the best notice practicable under the circumstances, and thus satisfied both constitutional due process and Rule 23 of the Federal Rules of Civil Procedure.

- ***In re Daou Sys.***, 411 F.3d 1006 (9th Cir. 2005). The Ninth Circuit sustained investors' allegations of accounting fraud and ruled that loss causation was adequately alleged by pleading that the value of the stock they purchased declined when the issuer's true financial condition was revealed.

- ***Barrie v. Intervoice-Brite, Inc.***, 397 F.3d 249 (5th Cir.), *reh'g denied and opinion modified*, 409 F.3d 653 (5th Cir. 2005). The Fifth Circuit upheld investors' accounting-fraud claims, holding that fraud is pled as to both defendants when one knowingly utters a false statement and the other knowingly fails to correct it, even if the complaint does not specify who spoke and who listened.

- ***City of Monroe Emps. Ret. Sys. v. Bridgestone Corp.***, 399 F.3d 651 (6th Cir. 2005). The Sixth Circuit held that a statement regarding objective data supposedly supporting a corporation's belief that its tires were safe was actionable where jurors could have found a reasonable basis to believe the corporation was aware of undisclosed facts seriously undermining the statement's accuracy.

- ***Ill. Mun. Ret. Fund v. Citigroup, Inc.***, 391 F.3d 844 (7th Cir. 2004). The Seventh Circuit upheld a district court's decision that the Illinois Municipal Retirement Fund was entitled to litigate its claims under the Securities Act of 1933 against WorldCom's underwriters before a state court rather than before the federal forum sought by the defendants.

- ***Nursing Home Pension Fund, Local 144 v. Oracle Corp.***, 380 F.3d 1226 (9th Cir. 2004). The Ninth Circuit ruled that defendants' fraudulent intent could be inferred from allegations concerning their false representations, insider stock sales and improper accounting methods.

- ***Southland Sec. Corp. v. INSpire Ins. Sols. Inc.***, 365 F.3d 353 (5th Cir. 2004). The Fifth Circuit sustained allegations that an issuer's CEO made fraudulent statements in connection with a contract announcement.

- ***Smith v. Am. Family Mut. Ins. Co.***, 289 S.W.3d 675 (Mo. Ct. App. 2009). Capping nearly a decade of hotly contested litigation, the Missouri Court of Appeals reversed the trial court's judgment notwithstanding the verdict for auto insurer American Family and reinstated a unanimous jury verdict for the plaintiff class.

- ***Troyk v. Farmers Grp., Inc.***, 171 Cal. App. 4th 1305 (2009). The California Court of Appeal held that Farmers Insurance's practice of levying a "service charge" on one-month auto insurance policies, without specifying the charge in the policy, violated California's Insurance Code.

- ***Lebrilla v. Farmers Grp., Inc.***, 119 Cal. App. 4th 1070 (2004). Reversing the trial court, the California Court of Appeal ordered class certification of a suit against Farmers, one of the largest automobile insurers in California, and ruled that Farmers' standard automobile policy requires it to provide parts that are as good as those made by vehicle's manufacturer. The case involved Farmers' practice of using inferior imitation parts when repairing insureds' vehicles.

- ***In re Monumental Life Ins. Co.***, 365 F.3d 408, 416 (5th Cir. 2004). The Fifth Circuit Court of Appeals reversed a district court's denial of class certification in a case filed by African-Americans seeking to remedy racially discriminatory insurance practices. The Fifth Circuit held that a monetary relief claim is viable in a Rule 23(b)(2) class if it flows directly from liability to the class as a whole and is capable of classwide "'computation by means of objective standards and not dependent in any significant way on the intangible, subjective differences of each class member's circumstances.'"

- ***Dent v. National Football League***, No. 15-15143 (9th Cir.). In September 2018, the United States Court of Appeals for the Ninth Circuit issued an important decision reversing the district court's previous dismissal of the *Dent v. National Football League* litigation, concluding that the complaint brought by NFL Hall of Famer Richard Dent and others should not be dismissed on labor-law preemption grounds. The case was remanded to the district court for further proceedings.

- ***Kwikset Corp. v. Superior Court***, 51 Cal. 4th 310 (2011). In a leading decision interpreting the scope of Proposition 64's new standing requirements under California's Unfair Competition Law (UCL), the California Supreme Court held that consumers alleging that a manufacturer has misrepresented its product have "lost money or property" within the meaning of the initiative, and thus have standing to sue under the UCL, if they "can truthfully allege that they were deceived by a product's label into spending money to purchase the product, and would not have purchased it otherwise." *Id*. at 317. *Kwikset* involved allegations, proven at trial, that defendants violated California's "Made in the U.S.A." statute by representing on their labels that their products were "Made in U.S.A." or "All-American Made" when, in fact, the products were substantially made with foreign parts and labor.

- ***Safeco Ins. Co. of Am. v. Superior Court***, 173 Cal. App. 4th 814 (2009). In a class action against auto insurer Safeco, the California Court of Appeal agreed that the plaintiff should have access to discovery to identify a new class representative after her standing to sue was challenged.

- ***Consumer Privacy Cases***, 175 Cal. App. 4th 545 (2009). The California Court of Appeal rejected objections to a nationwide class action settlement benefiting Bank of America customers.

- ***Koponen v. Pac. Gas & Elec. Co.***, 165 Cal. App. 4th 345 (2008). The Firm's attorneys obtained a published decision reversing the trial court's dismissal of the action, and holding that the plaintiff's claims for damages arising from the utility's unauthorized use of rights-of-way or easements obtained from the plaintiff and other landowners were not barred by a statute limiting the authority of California courts to review or correct decisions of the California Public Utilities Commission.

- ***Sanford v. MemberWorks, Inc.***, 483 F.3d 956 (9th Cir. 2007). In a telemarketing-fraud case, where the plaintiff consumer insisted she had never entered the contractual arrangement that defendants said bound her to arbitrate individual claims to the exclusion of pursuing class claims, the Ninth Circuit reversed an order compelling arbitration – allowing the plaintiff to litigate on behalf of a class.

- ***Ritt v. Billy Blanks Enters.***, 870 N.E.2d 212 (Ohio Ct. App. 2007). In the Ohio analog to the *West* case, the Ohio Court of Appeals approved certification of a class of Ohio residents seeking relief under Ohio's consumer protection laws for the same telemarketing fraud.

- ***Haw. Med. Ass'n v. Haw. Med. Serv. Ass'n***, 148 P.3d 1179 (Haw. 2006). The Supreme Court of Hawaii ruled that claims of unfair competition were not subject to arbitration and that claims of tortious interference with prospective economic advantage were adequately alleged.

- ***Branick v. Downey Sav. & Loan Ass'n***, 39 Cal. 4th 235 (2006). Robbins Geller attorneys were part of a team of lawyers that briefed this case before the Supreme Court of California. The court issued a unanimous decision holding that new plaintiffs may be substituted, if necessary, to preserve actions pending when Proposition 64 was passed by California voters in 2004. Proposition 64 amended California's Unfair Competition Law and was aggressively cited by defense lawyers in an effort to dismiss cases after the initiative was adopted.

- ***McKell v. Wash. Mut., Inc.***, 142 Cal. App. 4th 1457 (2006). The California Court of Appeal reversed the trial court, holding that plaintiff's theories attacking a variety of allegedly inflated mortgage-related fees were actionable.

- ***West Corp. v. Superior Court***, 116 Cal. App. 4th 1167 (2004). The California Court of Appeal upheld the trial court's finding that jurisdiction in California was appropriate over the out-of-state corporate defendant whose telemarketing was aimed at California residents. Exercise of jurisdiction was found to be in keeping with considerations of fair play and substantial justice.

- ***Kruse v. Wells Fargo Home Mortg., Inc.***, 383 F.3d 49 (2d Cir. 2004), and ***Santiago v. GMAC Mortg. Grp., Inc.***, 417 F.3d 384 (3d Cir. 2005). In two groundbreaking federal appellate decisions, the Second and Third Circuits each ruled that the Real Estate Settlement Practices Act prohibits marking up home loan-related fees and charges.

Additional Judicial Commendations

Robbins Geller attorneys have been praised by countless judges all over the country for the quality of their representation in class-action lawsuits. In addition to the judicial commendations set forth in the Prominent Cases and Precedent-Setting Decisions sections, judges have acknowledged the successful results of the Firm and its attorneys with the following plaudits:

- On October 5, 2022, at the final approval hearing of the settlement, the Honorable Paul A. Fioravanti, Jr. stated: "The settlement achieved here is, in short, impressive. . . . This litigation was hard fought. The issues were complex. . . . Plaintiffs' lead counsel here are among the most highly respected practitioners in this Court with a reputation for exacting substantial awards for the classes that they represent. . . . Again, the benefit was outstanding. . . . Counsel, this was an interesting case. I know you worked really hard on it. Fantastic result. The fee was well deserved." *City of Warren Gen. Emps.' Ret. Sys. v. Roche*, No. 2019-0740-PAF, Transcript at 26-29 (Del. Ch. Oct. 5, 2022).

- On February 4, 2021, in granting final approval of the settlement, the Honorable Mark H. Cohen of the United States District Court for the Northern District of Georgia stated: "Lead Counsel successfully achieved a greater-than-average settlement 'in the face of significant risks.'" Robbins Geller's "hard-fought litigation in the Eleventh Circuit" and "[i]n considering the experience, reputation, and abilities of the attorneys, the Court recognize[d] that Lead Counsel is well-regarded in the legal community, especially in litigating class-action securities cases." *Monroe County Employees' Retirement System v. The Southern Company*, No. 1:17-cv-00241, Order at 8-9 (N.D. Ga. Feb. 4, 2021).

- On December 18, 2020, at the final approval hearing of the settlement, the Honorable Yvonne Gonzalez Rogers of the United States District Court for the Northern District of California commended Robbins Geller, stating: "Counsel performed excellent work in not only investigating and analyzing the core of the issues, but in negotiating and demanding the necessary reforms to prevent malfeasance for the benefit of the shareholders and the consumers. The Court complements counsel for its excellence." *In re RH S'holder Derivative Litig.*, No. 4:18-cv-02452-YGR, Order and Final Judgment at 3 (N.D. Cal. Dec. 18, 2020).

- On October 23, 2020, at the final approval hearing of the settlement, the Honorable P. Kevin Castel of the United States District Court for the Southern District of New York praised the firm, "[Robbins Geller] has been sophisticated and experienced." He also noted that: "[T]he quality of the representation . . . was excellent. The experience of counsel is also a factor. Robbins Geller certainly has the extensive experience and they were litigating against national powerhouses . . . ." *City of Birmingham Ret. & Relief Sys. v. BRF S.A.*, No. 18 Civ. 2213 (PKC), Transcript at 12-13, 18 (S.D.N.Y. Oct. 23, 2020).

- In May 2020, in granting final approval of the settlement, the Honorable Mark L. Wolf praised Robbins Geller: "[T]he class has been represented by excellent honorable counsel . . . . [T]he fund was represented by experienced, energetic, able counsel, the fund was engaged and informed, and the fund followed advice of experienced counsel. Counsel for the class have been excellent, and I would say honorable." Additionally, Judge Wolf noted, "I find that the work that's been done primarily by Robbins Geller has been excellent and honorable and efficient. . . . [T]his has been a challenging case, and they've done an excellent job." *McGee v. Constant Contact, Inc.*, No. 1:15-cv-13114-MLW, Transcript at 21, 31, 61 (D. Mass. May 27, 2020).

- In December 2019, the Honorable Margo K. Brodie noted in granting final approval of the settlement that "[Robbins Geller and co-counsel] have also demonstrated the utmost

professionalism despite the demands of the extreme perseverance that this case has required, litigating on behalf of a class of over 12 million for over fourteen years, across a changing legal landscape, significant motion practice, and appeal and remand. Class counsel's pedigree and efforts alone speak to the quality of their representation." *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.*, No. 1:05-md-01720-MKB-JO, Memorandum & Order (E.D.N.Y. Dec. 16, 2019).

- In October 2019, the Honorable Claire C. Cecchi noted that Robbins Geller is "capable of adequately representing the class, both based on their prior experience in class action lawsuits and based on their capable advocacy on behalf of the class in this action." The court further commended the Firm and co-counsel for "conduct[ing] the [l]itigation . . . with skill, perseverance, and diligent advocacy." *Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's, London Members*, No. 2:08-cv-00235-CCC-JAD, Order at 4 (D.N.J. Oct. 3, 2019); *Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's, London Members of Syndicates*, No. 2:08-cv-00235-CCC-JAD, Order Awarding Attorneys' Fees and Expenses/Charges and Service Awards at 3 (D.N.J. Oct. 3, 2019).

- In June 2019, the Honorable T.S. Ellis, III noted that Robbins Geller "achieved the [$108 million] [s]ettlement with skill, perseverance, and diligent advocacy." At the final approval hearing, the court further commended Robbins Geller by stating, "I think the case was fully and appropriately litigated [and] you all did a very good job. . . . [T]hank you for your service in the court. . . . [You're] first-class lawyers . . . ." *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031, Order Awarding Attorneys' Fees and Expenses at 3 (E.D. Va. June 7, 2019); *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031, Transcript at 28-29 (E.D. Va. June 7, 2019).

- In June 2019, in granting final approval of the settlement, the Honorable John A. Houston stated: Robbins Geller's "skill and quality of work was extraordinary . . . . I'll note from the top that this has been an aggressively litigated action." *In re Morning Song Bird Food Litig.*, No. 3:12-cv-01592-JAH-AGS, Transcript at 4, 9 (S.D. Cal. June 3, 2019).

- In May 2019, in granting final approval of the settlement, the Honorable Richard H. DuBois stated: Robbins Geller is "highly experienced and skilled" for obtaining a "fair, reasonable, and adequate" settlement in the "interest of the [c]lass [m]embers" after "extensive investigation." *Chicago Laborers Pension Fund v. Alibaba Grp. Holding Ltd.*, No. CIV535692, Judgment and Order Granting Final Approval of Class Action Settlement at 3 (Cal. Super. Ct., San Mateo Cnty. May 17, 2019).

- In April 2019, the Honorable Kathaleen St. J. McCormick noted: "[S]ince the inception of this litigation, plaintiffs and their counsel have vigorously prosecuted the claims brought on behalf of the class. . . . When Vice Chancellor Laster appointed lead counsel, he effectively said: Go get a good result. And counsel took that to heart and did it. . . . The proposed settlement was the product of intense litigation and complex mediation. . . . [Robbins Geller has] only built a considerable track record, never burned it, which gave them the credibility necessary to extract the benefits achieved." *In re Calamos Asset Mgmt., Inc. S'holder Litig.*, No. 2017-0058-JTL, Transcript at 87, 93, 95, 98 (Del. Ch. Apr. 25, 2019).

- In April 2019, the Honorable Susan O. Hickey noted that Robbins Geller "achieved an exceptional [s]ettlement with skill, perseverance, and diligent advocacy." *City of Pontiac Gen. Emps.' Ret. Sys. v. Wal-Mart Stores, Inc.*, No. 5:12-cv-5162, Order Awarding Attorneys' Fees and Expenses at 3 (W.D. Ark. Apr. 8, 2019).

- In January 2019, the Honorable Margo K. Brodie noted that Robbins Geller "has arduously represented a variety of plaintiffs' groups in this action[,] . . . [has] extensive antitrust class action litigation experience . . . [and] negotiated what [may be] the largest antitrust settlement in history." *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.*, 330 F.R.D. 11, 34 (E.D.N.Y. 2019).

- On December 20, 2018, at the final approval hearing for the settlement, the court lauded Robbins Geller's attorneys and their work: "[T]his is a pretty extraordinary settlement, recovery on behalf of the members of the class. . . . I've been very impressed with the level of lawyering in the case . . . and with the level of briefing . . . and I wanted to express my appreciation for that and for the work that everyone has done here." The court concluded, "your clients were all blessed to have you, [and] not just because of the outcome." *Duncan v. Joy Global, Inc.*, No. 16-CV-1229, Transcript at 12, 20-21 (E.D. Wis. Dec. 20, 2018).

- In October 2017, the Honorable William Alsup noted that Robbins Geller and lead plaintiff "vigorously prosecuted this action." *In re LendingClub Sec. Litig.*, No. 3:16-cv-02627-WHA, Order at 13 (N.D. Cal. Oct. 20, 2017).

- On November 9, 2018, in granting final approval of the settlement, the Honorable Jesse M. Furman commented: "[Robbins Geller] did an extraordinary job here. . . . [I]t is fair to say [this was] probably the most complicated case I have had since I have been on the bench. . . . I cannot really imagine how complicated it would have been if I didn't have counsel who had done as admirable [a] job in briefing it and arguing as you have done. You have in my view done an extraordinary service to the class. . . . I think you have done an extraordinary job and deserve thanks and commendation for that." *Alaska Elec. Pension Fund v. Bank of Am. Corp.*, No. 1:14-cv-07126-JMF-OTW, Transcript at 27-28 (S.D.N.Y. Nov. 9, 2018).

- On September 12, 2018, at the final approval hearing of the settlement, the Honorable William H. Orrick of the Northern District of California praised Robbins Geller's "high-quality lawyering" in a case that "involved complicated discovery and complicated and novel legal issues," resulting in an "excellent" settlement for the class. The "lawyering . . . was excellent" and the case was "very well litigated." *In re Lidoderm Antitrust Litig.*, No. 14-MDL-02521-WHO, Transcript at 11, 14, 22 (N.D. Cal. Sep. 12, 2018).

- On March 31, 2017, in granting final approval of the settlement, the Honorable Gonzalo P. Curiel hailed the settlement as "extraordinary" and "all the more exceptional when viewed in light of the risk" of continued litigation. The court further commended Robbins Geller for prosecuting the case on a *pro bono* basis: "Class Counsel's exceptional decision to provide nearly seven years of legal services to Class Members on a *pro bono* basis evidences not only a lack of collusion, but also that Class Counsel are in fact representing the best interests of Plaintiffs and the Class Members in this Settlement. Instead of seeking compensation for fees and costs that they would otherwise be entitled to, Class Counsel have acted to allow maximum recovery to Plaintiffs and Class Members. Indeed, that Eligible Class Members may receive recovery of 90% or greater is a testament to Class Counsel's representation and dedication to act in their clients' best interest." In addition, at the final approval hearing, the court commented that "this is a case that has been litigated – if not fiercely, zealously throughout." *Low v. Trump Univ., LLC*, 246 F. Supp. 3d 1295, 1302, 1312 (S.D. Cal. 2017), *aff'd*, 881 F.3d 1111 (9th Cir. 2018); *Low v. Trump University LLC and Donald J. Trump*, No. 10-cv-0940 GPC-WVG, and *Cohen v. Donald J. Trump*, No. 13-cv-2519-GPC-WVG, Transcript at 7 (S.D. Cal. Mar. 30, 2017).

- In January 2017, at the final approval hearing, the Honorable Kevin H. Sharp of the Middle District of Tennessee commended Robbins Geller attorneys, stating: "It was complicated, it was

drawn out, and a lot of work clearly went into this [case] . . . . I think there is some benefit to the shareholders that are above and beyond money, a benefit to the company above and beyond money that changed hands." *In re Community Health Sys., Inc. S'holder Derivative Litig.*, No. 3:11-cv-00489, Transcript at 10 (M.D. Tenn. Jan. 17, 2017).

- In November 2016, at the final approval hearing, the Honorable James G. Carr stated: "I kept throwing the case out, and you kept coming back. . . . And it's both remarkable and noteworthy and a credit to you and your firm that you did so. . . . [Y]ou persuaded the Sixth Circuit. As we know, that's no mean feat at all." Judge Carr further complimented the Firm, noting that it "goes without question or even saying" that Robbins Geller is very well-known nationally and that the settlement is an excellent result for the class. He succinctly concluded that "given the tenacity and the time and the effort that [Robbins Geller] lawyers put into [the case]" makes the class "a lot better off." *Plumbers & Pipefitters Nat'l Pension Fund v. Burns*, No. 3:05-cv-07393-JGC, Transcript at 4, 10, 14, 17 (N.D. Ohio Nov. 18, 2016).

- In September 2016, in granting final approval of the settlement, Judge Arleo commended the "vigorous and skilled efforts" of Robbins Geller attorneys for obtaining "an excellent recovery." Judge Arleo added that the settlement was reached after "contentious, hard-fought litigation" that ended with "a very, very good result for the class" in a "risky case." *City of Sterling Heights Gen. Emps.' Ret. Sys. v. Prudential Fin., Inc.*, No. 2:12-cv-05275-MCA-LDW, Transcript of Hearing at 18-20 (D.N.J. Sep. 28, 2016).

- In August 2015, at the final approval hearing for the settlement, the Honorable Karen M. Humphreys praised Robbins Geller's "extraordinary efforts" and "excellent lawyering," noting that the settlement "really does signal that the best is yet to come for your clients and for your prodigious labor as professionals. . . . I wish more citizens in our country could have an appreciation of what this [settlement] truly represents." *Bennett v. Sprint Nextel Corp.*, No. 2:09-cv-02122-EFM-KMH, Transcript at 8, 25 (D. Kan. Aug. 12, 2015).

- In August 2015, the Honorable Judge Max O. Cogburn, Jr. noted that "plaintiffs' attorneys were able [to] achieve the big success early" in the case and obtained an "excellent result." The "extraordinary" settlement was because of "good lawyers . . . doing their good work." *Nieman v. Duke Energy Corp.*, No. 3:12-cv-456, Transcript at 21, 23, 30 (W.D.N.C. Aug. 12, 2015).

- In July 2015, in approving the settlement, the Honorable Douglas L. Rayes of the District of Arizona stated: "Settlement of the case during pendency of appeal for more than an insignificant amount is rare. The settlement here is substantial and provides favorable recovery for the settlement class under these circumstances." He continued, noting, "[a]s against the objective measures of . . . settlements [in] other similar cases, [the recovery] is on the high end." *Teamsters Local 617 Pension & Welfare Funds v. Apollo Grp., Inc.*, No. 2:06-cv-02674-DLR, Transcript at 8, 11 (D. Ariz. July 28, 2015).

- In June 2015, at the conclusion of the hearing for final approval of the settlement, the Honorable Susan Richard Nelson of the District of Minnesota noted that it was "a pleasure to be able to preside over a case like this," praising Robbins Geller in achieving "an outstanding [result] for [its] clients," as she was "very impressed with the work done on th[e] case." *In re St. Jude Med., Inc. Sec. Litig.*, No. 0:10-cv-00851-SRN-TNL, Transcript at 7 (D. Minn. June 12, 2015).

- In May 2015, at the fairness hearing on the settlement, the Honorable William G. Young noted that the case was "very well litigated" by Robbins Geller attorneys, adding that "I don't just say that as a matter of form. . . . I thank you for the vigorous litigation that I've been permitted to be a part of." *Courtney v. Avid Tech., Inc.*, No. 1:13-cv-10686-WGY, Transcript at 8-9 (D. Mass. May 12, 2015).

- In January 2015, the Honorable William J. Haynes, Jr. of the Middle District of Tennessee described the settlement as a "highly favorable result achieved for the Class" through Robbins Geller's "diligent prosecution . . . [and] quality of legal services." The settlement represents the fourth-largest securities recovery ever in the Middle District of Tennessee and one of the largest in more than a decade. *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.*, No. 3:09-cv-00882, 2015 U.S. Dist. LEXIS 181943, at *6-*7 (M.D. Tenn. Jan. 16, 2015).

- In September 2014, in approving the settlement for shareholders, Vice Chancellor John W. Noble noted "[t]he litigation caused a substantial benefit for the class. It is unusual to see a $29 million recovery." Vice Chancellor Noble characterized the litigation as "novel" and "not easy," but "[t]he lawyers took a case and made something of it." The court commended Robbins Geller's efforts in obtaining this result: "The standing and ability of counsel cannot be questioned" and "the benefits achieved by plaintiffs' counsel in this case cannot be ignored." *In re Gardner Denver, Inc. S'holder Litig.*, No. 8505-VCN, Transcript at 26-28 (Del. Ch. Sep. 3, 2014).

- In May 2014, at the conclusion of the hearing for final approval of the settlement, the Honorable Elihu M. Berle stated: "I would finally like to congratulate counsel on their efforts to resolve this case, on excellent work – it was the best interest of the class – and to the exhibition of professionalism. So I do thank you for all your efforts." *Liberty Mutual Overtime Cases*, No. JCCP 4234, Transcript at 20:1-5 (Cal. Super. Ct., Los Angeles Cnty. May 29, 2014).

- In March 2014, Ninth Circuit Judge J. Clifford Wallace (presiding) expressed the gratitude of the court: "Thank you. I want to especially thank counsel for this argument. This is a very complicated case and I think we were assisted no matter how we come out by competent counsel coming well prepared. . . . It was a model of the type of an exercise that we appreciate. Thank you very much for your work . . . you were of service to the court." *Eclectic Properties East, LLC v. The Marcus & Millichap Co.*, No. 12-16526, Transcript (9th Cir. Mar. 14, 2014).

- In February 2014, in approving a settlement, Judge Edward M. Chen noted the "very substantial risks" in the case and recognized Robbins Geller had performed "extensive work on the case." *In re VeriFone Holdings, Inc. Sec. Litig.*, No. C-07-6140, 2014 U.S. Dist. LEXIS 20044, at *5, *11-*12 (N.D. Cal. Feb. 18, 2014).

- In August 2013, in granting final approval of the settlement, the Honorable Richard J. Sullivan stated: "Lead Counsel is to be commended for this result: it expended considerable effort and resources over the course of the action researching, investigating, and prosecuting the claims, at significant risk to itself, and in a skillful and efficient manner, to achieve an outstanding recovery for class members. Indeed, the result – and the class's embrace of it – is a testament to the experience and tenacity Lead Counsel brought to bear." *City of Livonia Emps. Ret. Sys. v. Wyeth*, No. 07 Civ. 10329, 2013 U.S. Dist. LEXIS 113658, at *13 (S.D.N.Y. Aug. 7, 2013).

- In July 2013, in granting final approval of the settlement, the Honorable William H. Alsup stated that Robbins Geller did "excellent work in this case," and continued, "I look forward to seeing you on the next case." *Fraser v. Asus Comput. Int'l*, No. C 12-0652, Transcript at 12:2-3 (N.D. Cal. July 11, 2013).

- In June 2013, in certifying the class, U.S. District Judge James G. Carr recognized Robbins Geller's steadfast commitment to the class, noting that "plaintiffs, with the help of Robbins Geller, have twice successfully appealed this court's orders granting defendants' motion to dismiss." *Plumbers & Pipefitters Nat'l Pension Fund v. Burns*, 292 F.R.D. 515, 524 (N.D. Ohio 2013).

- In November 2012, in granting appointment of lead plaintiff, Chief Judge James F. Holderman commended Robbins Geller for its "substantial experience in securities class action litigation" and commented that the Firm "is recognized as 'one of the most successful law firms in securities class actions, if not the preeminent one, in the country.' *In re Enron Corp. Sec.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008) (Harmon, J.)." He continued further that, "'Robbins Geller attorneys are responsible for obtaining the largest securities fraud class action recovery ever [$***7.2*** billion in *Enron*], as well as the largest recoveries in the Fifth, Sixth, Eighth, Tenth and Eleventh Circuits.'" *Bristol Cnty. Ret. Sys. v. Allscripts Healthcare Sols., Inc.*, No. 12 C 3297, 2012 U.S. Dist. LEXIS 161441, at *21 (N.D. Ill. Nov. 9, 2012).

- In June 2012, in granting plaintiffs' motion for class certification, the Honorable Inge Prytz Johnson noted that other courts have referred to Robbins Geller as "'one of the most successful law firms in securities class actions . . . in the country.'" *Local 703, I.B. v. Regions Fin. Corp.*, 282 F.R.D. 607, 616 (N.D. Ala. 2012) (quoting *In re Enron Corp. Sec. Litig.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008)), *aff'd in part and vacated in part on other grounds*, 762 F.3d 1248 (11th Cir. 2014).

- In June 2012, in granting final approval of the settlement, the Honorable Barbara S. Jones commented that "class counsel's representation, from the work that I saw, appeared to me to be of the highest quality." *In re CIT Grp. Inc. Sec. Litig.*, No. 08 Civ. 6613, Transcript at 9:16-18 (S.D.N.Y. June 13, 2012).

- In March 2012, in granting certification for the class, Judge Robert W. Sweet referenced the *Enron* case, agreeing that Robbins Geller's "'clearly superlative litigating and negotiating skills'" give the Firm an "'outstanding reputation, experience, and success in securities litigation nationwide,'" thus, "'[t]he experience, ability, and reputation of the attorneys of [Robbins Geller] is not disputed; it is one of the most successful law firms in securities class actions, if not the preeminent one, in the country.'" *Billhofer v. Flamel Techs., S.A.*, 281 F.R.D. 150, 158 (S.D.N.Y. 2012).

- In March 2011, in denying defendants' motion to dismiss, Judge Richard Sullivan commented: "Let me thank you all. . . . [The motion] was well argued . . . and . . . well briefed . . . . I certainly appreciate having good lawyers who put the time in to be prepared . . . ." *Anegada Master Fund Ltd. v. PxRE Grp. Ltd.*, No. 08-cv-10584, Transcript at 83 (S.D.N.Y. Mar. 16, 2011).

- In January 2011, the court praised Robbins Geller attorneys: "They have gotten very good results for stockholders. . . . [Robbins Geller has] such a good track record." *In re Compellent Techs., Inc. S'holder Litig.*, No. 6084-VCL, Transcript at 20-21 (Del. Ch. Jan. 13, 2011).

- In August 2010, in reviewing the settlement papers submitted by the Firm, Judge Carlos Murguia stated that Robbins Geller performed "a commendable job of addressing the relevant issues with great detail and in a comprehensive manner . . . . The court respects the [Firm's] experience in the field of derivative [litigation]." *Alaska Elec. Pension Fund v. Olofson*, No. 08-cv-02344-CM-JPO (D. Kan.) (Aug. 20, 2010 e-mail from court re: settlement papers).

- In June 2009, Judge Ira Warshawsky praised the Firm's efforts in *In re Aeroflex, Inc. S'holder Litig.*: "There is no doubt that the law firms involved in this matter represented in my opinion the cream of the crop of class action business law and mergers and acquisition litigators, and from a judicial point of view it was a pleasure working with them." *In re Aeroflex, Inc. S'holder Litig.*, No. 003943/07, Transcript at 25:14-18 (N.Y. Sup. Ct., Nassau Cnty. June 30, 2009).

- In March 2009, in granting class certification, the Honorable Robert Sweet of the Southern District of New York commented in *In re NYSE Specialists Sec. Litig.*, 260 F.R.D. 55, 74 (S.D.N.Y. 2009): "As to the second prong, the Specialist Firms have not challenged, in this motion, the qualifications, experience, or ability of counsel for Lead Plaintiff, [Robbins Geller], to conduct this litigation. Given [Robbins Geller's] substantial experience in securities class action litigation and the extensive discovery already conducted in this case, this element of adequacy has also been satisfied."

- In June 2008, the court commented, "Plaintiffs' lead counsel in this litigation, [Robbins Geller], has demonstrated its considerable expertise in shareholder litigation, diligently advocating the rights of Home Depot shareholders in this Litigation. [Robbins Geller] has acted with substantial skill and professionalism in representing the plaintiffs and the interests of Home Depot and its shareholders in prosecuting this case." *City of Pontiac Gen. Emps.' Ret. Sys. v. Langone*, No. 2006-122302, Findings of Fact in Support of Order and Final Judgment at 2 (Ga. Super. Ct., Fulton Cnty. June 10, 2008).

- In a December 2006 hearing on the $50 million consumer privacy class action settlement in *Kehoe v. Fidelity Fed. Bank & Tr.*, No. 03-80593-CIV (S.D. Fla.), United States District Court Judge Daniel T.K. Hurley said the following:

> First, I thank counsel. As I said repeatedly on both sides, we have been very, very fortunate. We have had fine lawyers on both sides. The issues in the case are significant issues. We are talking about issues dealing with consumer protection and privacy. Something that is increasingly important today in our society. . . . I want you to know I thought long and hard about this. I am absolutely satisfied that the settlement is a fair and reasonable settlement. . . . I thank the lawyers on both sides for the extraordinary effort that has been brought to bear here . . . .

Kehoe v. Fidelity Fed. Bank & Tr., No. 03-80593-CIV, Transcript at 26, 28-29 (S.D. Fla. Dec. 7, 2006).

- In *Stanley v. Safeskin Corp.*, No. 99 CV 454 (S.D. Cal.), where Robbins Geller attorneys obtained $55 million for the class of investors, Judge Moskowitz stated:

> I said this once before, and I'll say it again. I thought the way that your firm handled this case was outstanding. This was not an easy case. It was a complicated case, and every step of the way, I thought they did a very professional job.

Stanley v. Safeskin Corp., No. 99 CV 454, Transcript at 13 (S.D. Cal. May 25, 2004).

ATTORNEY BIOGRAPHIES

Mario Alba Jr. | Partner

Mario Alba is a partner in the Firm's Melville office. He is a member of the Firm's Institutional Outreach Team, which provides advice to the Firm's institutional clients, including numerous public pension systems and Taft-Hartley funds throughout the United States, and consults with them on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation. Some of Alba's institutional clients are currently involved in securities cases involving Avalara, Inc., Clarivate plc, Dentsply Sirona Inc., Generac Holdings Inc., Globe Life Inc., Amgen, Inc., Virtu Financial, Inc., The Walt Disney Company, The Boeing Company, Merck & Co., Inc., Daimler, Novo Nordisk, and National Instruments Corporation.

Alba's institutional clients are/were also involved in other types of class actions, namely, *In re National Prescription Opiate Litigation* (over $50 billion paid to communities across the country), *In re Epipen (Epinephrine Injection, USP) Marketing, Sales Practices and Antitrust Litigation* ($609 million total recovery), *Forth v. Walgreen Co.* ($100 million recovery), and *In re Humira (Adalimumab) Antitrust Litigation*.

Alba has served as lead counsel in numerous cases and is responsible for initiating, investigating, researching, and filing securities and consumer fraud class actions. He has recovered hundreds of millions of dollars in numerous actions, including cases against Acadia Healthcare Company, Inc. ($179 million recovery); BHP Billiton Limited ($50 million recovery), Equinix, Inc. ($41.5 million recovery), Green Dot Corporation ($40 million recovery), BRF S.A. ($40 million recovery), L3 Technologies, Inc. ($34.5 million recovery), Impax Laboratories Inc. ($33 million recovery), Waste Management, Inc. ($30 million recovery), Reckitt Benckiser Group plc ($19.6 million recovery), Super Micro Computer, Inc. ($18.25 million recovery), and NBTY, Inc. ($16 million recovery).

Education

B.S., St. John's University, 1999; J.D., Hofstra University School of Law, 2002

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2022-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2024; Rising Star, *Super Lawyers Magazine*, 2012-2013, 2016-2017; B.S., Dean's List, St. John's University, 1999; Selected as participant in Hofstra Moot Court Seminar, Hofstra University School of Law

Michael Albert | Partner

Michael Albert is a partner in the Firm's San Diego office, where his practice focuses on complex securities litigation. Albert is a member of the Firm's Lead Plaintiff Advisory Team, which advises institutional investors in connection with lead plaintiff motions, and assists them in securing appointment as lead plaintiff.

Albert has been a member of litigation teams that have successfully recovered hundreds of millions of dollars for investors in securities class actions, including: *In re Alphabet, Inc. Securities Litigation* ($350 million recovery), *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* ($272 million recovery), *City of Pontiac General Employees' Retirement Systems v. Wal-Mart Stores, Inc.* ($160 million recovery), and *In re LendingClub Securities Litigation* ($125 million recovery). Albert was also a member of the litigation team that obtained a $85 million cash settlement in a consumer class action against Scotts Miracle-Gro.

Education

B.A., University of Wisconsin-Madison, 2010; J.D., University of Virginia School of Law, 2014

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2024-2027; Best Lawyer in America, *Best Lawyers®*, 2025-2027; Lawyer on the Fast Track Honoree, California Legal Awards, *Law.com*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Impact Case Award: *In re Alphabet, Inc. Securities Litigation*, *Benchmark Litigation*, 2025; 500 X – The Next Generation, *Lawdragon*, 2023-2024; Rising Star, *Super Lawyers Magazine,* 2020-2024; Managing Board Member, *Virginia Tax Review*, University of Virginia School of Law

Matthew I. Alpert | Partner

Matthew Alpert is a partner in the Firm's San Diego office and focuses on the prosecution of securities fraud litigation. Most recently, Alpert and a team of Robbins Geller attorneys obtained a $434 million settlement in *In re Under Armour Sec. Litig.* (D. Md.) after nearly seven years of hard-fought litigation and less than a month before a jury trial in Baltimore was scheduled to commence. Alpert was also a member of the litigation team that successfully obtained class certification in a securities fraud class action against Regions Financial, a class certification decision that was substantively affirmed by the United States Court of Appeals for the Eleventh Circuit in *Loc. 703, I.B. of T. Grocery & Food Emps. Welfare Fund v. Regions Fin. Corp.*, 762 F.3d 1248 (11th Cir. 2014). Upon remand, the United States District Court for the Northern District of Alabama granted class certification again, rejecting defendants' post-*Halliburton II* arguments concerning stock price impact. Alpert and the Robbins Geller team litigated the case until it eventually settled for $90 million.

Some of Alpert's previous cases include: the individual opt-out actions of the AOL Time Warner class action – *Regents of the Univ. of Cal. v. Parsons* (Cal. Super. Ct., Los Angeles Cnty.) and *Ohio Pub. Emps. Ret. Sys. v. Parsons* (Ohio. Ct. of Common Pleas, Franklin Cnty.) (total settlement over $600 million); *In re Under Armour Sec. Litig.* (D. Md.); ($434 million settlement); *Loc. 703, I.B. of T. Grocery & Food Emps. Welfare Fund v. Regions Fin. Corp.* (N.D. Ala.) ($90 million settlement); *In re MGM Mirage Sec. Litig.* (D. Nev.) ($75 million); *In re CIT Grp. Inc. Sec. Litig.* (S.D.N.Y.) ($75 million settlement); *Luna v. Marvell Tech. Grp., Ltd.* (N.D. Cal.) ($72.5 million settlement); *Deka Inv. GmbH v. Santander Consumer USA Holdings Inc.* (N.D. Tex.) ($47 million settlement); *In re Bridgestone Sec. Litig.* (M.D. Tenn.) ($30 million settlement); *In re Walter Energy, Inc. Sec. Litig.* (N.D. Ala.) ($25 million); *City of Hialeah Emps.' Ret. Sys. & Laborers Pension Tr. Fund for N. Cal. v. Toll Bros., Inc.* (E.D. Pa.) ($25 million settlement); *In re Molycorp, Inc. Sec. Litig.* (D. Colo.) ($20.5 million settlement); *In re Banc of Cal. Sec. Litig.* (C.D. Cal.) ($19.75 million); *Zimmerman v. Diplomat Pharmacy, Inc.* (E.D. Mich.) ($14.1 million); *Batwin v. Occam Networks, Inc.* (C.D. Cal.) ($13.9 million settlement); *Int'l Bhd. of Elec. Workers Loc. 697 Pension Fund v. Int'l Game Tech.* (D. Nev.) ($12.5 million settlement); *Kmiec v. Powerwave Techs. Inc.* (C.D. Cal.) ($8.2 million); *In re Sunterra Corp. Sec. Litig.* (D. Nev.) ($8 million settlement); and *Luman v. Anderson* (W.D. Mo.) ($4.25 million settlement).

Education

B.A., University of Wisconsin at Madison, 2001; J.D., Washington University, St. Louis, 2005

Honors / Awards

Best Lawyer in America, *Best Lawyers*®, 2027; Rising Star, *Super Lawyers Magazine*, 2015-2019

Darryl J. Alvarado | Partner

Darryl Alvarado is a partner in the Firm's San Diego office. He focuses his practice on securities fraud and other complex civil litigation. Alvarado was a member of the trial team in *Smilovits v. First Solar, Inc.*, which recovered $350 million for aggrieved investors. The *First Solar* settlement, reached on the eve of trial after more than seven years of litigation and an interlocutory appeal to the U.S. Supreme Court, is the fifth-largest PSLRA recovery ever obtained in the Ninth Circuit. Alvarado recently litigated *Monroe County Employees' Retirement System v. The Southern Company*, which recovered $87.5 million for investors after more than three years of litigation. The settlement resolved securities fraud claims stemming from defendants' issuance of misleading statements and omissions regarding the construction of a first-of-its-kind "clean coal" power plant in Kemper County, Mississippi. Alvarado helped secure $388 million for investors in J.P. Morgan residential mortgage-backed securities in *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.* That settlement is, on a percentage basis, the largest recovery ever achieved in an RMBS class action. He was also a member of a team of attorneys that secured $95 million for investors in Morgan Stanley-issued RMBS in *In re Morgan Stanley Mortgage Pass-Through Certificates Litigation*.

Alvarado was a member of a team of lawyers that obtained landmark settlements, on the eve of trial, from the major credit rating agencies and Morgan Stanley arising out of the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles in *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Incorporated* and *King County, Washington v. IKB Deutsche Industriebank AG*. He was integral in obtaining several precedent-setting decisions in those cases, including defeating the rating agencies' historic First Amendment defense and defeating the ratings agencies' motions for summary judgment concerning the actionability of credit ratings. Alvarado was also a member of a team of attorneys responsible for obtaining for aggrieved investors $27 million in *In re Cooper Companies Securities Litigation*, $19.5 million in *City of Pontiac General Employees' Retirement System v. Lockheed Martin Corporation*, and comprehensive corporate governance reforms to address widespread off-label marketing and product safety violations in *In re Johnson & Johnson Derivative Litigation*.

Education

B.A., University of California, Santa Barbara, 2004; J.D., University of San Diego School of Law, 2007

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2026; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2023-2025; Future Star, *Benchmark Litigation*, 2024; Rising Star, *Super Lawyers Magazine*, 2015-2022; 40 & Under Hot List, *Benchmark Litigation*, 2018-2021; Top 40 Under 40, *Daily Journal*, 2021; "Outstanding Young Attorneys," *San Diego Daily Transcript*, 2011

Mathew Andrews | Partner

Mathew Andrews is a partner in the Firm's Manhattan office and focuses his practice on complex securities litigation. He has unique experience representing both plaintiffs and defendants in securities fraud cases. Before joining the Firm in January 2026, Andrews served as an Assistant United States Attorney in the U.S. Attorney's Office for the Southern District of New York for over seven years.

As an Assistant U.S. Attorney, Andrews represented the United States in criminal cases of securities fraud, public corruption, money laundering, tax evasion, violations of the Bank Secrecy Act, racketeering, and murder. Andrews headed the prosecution team in *United States v. Gulkarov et al.*, which charged over 70 defendants with participating in one of the largest healthcare fraud, money laundering, and bribery schemes in New York history. He also led prosecutions and investigations of fintech companies, privately held banks, and AI and crypto companies.

Andrews successfully tried seven cases to verdict, including two convictions of high-ranking DEA Special Agents for bribery, three convictions for murder, and multiple convictions for fraud and money laundering. He also successfully litigated over a dozen cases before the U.S. Court of Appeals for the Second Circuit, including the habeus appeal of Dimitry Aronshtein, who co-led one of the largest bribery schemes in New York City history.

Earlier in his career, Andrews defended individuals in securities fraud cases and investigations as an associate at Morvillo Abramowitz Grand Iason & Anello P.C. He completed clerkships with the Honorable Jed Rakoff of the U.S. District Court for the Southern District of New York and the Honorable Robert Katzmann, then-Chief Judge of the U.S. Court of Appeals for the Second Circuit.

Education

B.A., Yale University, 2011; J.D., Yale Law School, 2014

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2026; Federal Law Enforcement Foundation Prosecutor of the Year, 2024; B.A., *Summa Cum Laude*, Yale University, 2011

Dory P. Antullis | Partner

Dory Antullis is a partner in the Firm's Boca Raton office. Her litigation practice focuses on complex class actions, covering consumer fraud, public nuisance, environmental litigation, privacy litigation, pharmaceuticals, RICO, and antitrust litigation. Antullis also works with the Firm's settlement department, negotiating and documenting intricate, high-stakes settlements.

Antullis is a core member of the Firm's opioids team, leading the effort on behalf of cities, counties, and third-party payors around the country in *In re Nat'l Prescription Opiate Litig.*, No. 1:17-md-02804 (N.D. Ohio). In addition to serving on several committees in the MDL, she was a member of the winning trial team on behalf of the People of the State of California in San Francisco's bellwether case against Allergan, Teva, Walgreens, and others in the prescription opioid supply chain. Together with a trial win against Walgreens, the case has resulted in settlements valued at over $350 million. Antullis was also part of a small group of lawyers who negotiated and drafted settlement documents for the national opioid settlements with major distributors, manufacturers, and pharmacies – now totaling more than $50 billion.

Antullis has also been an integral part of Robbins Geller's history of successful privacy and data breach class action cases. She is currently serving as Co-Lead Class Counsel in *In re Luxottica of America, Inc. Data Breach Litig.*, No. 1:20-cv-00908-MRB (S.D. Ohio), and served as Liaison Counsel in *DeSue v. 20/20 Eye Care Network, Inc.*, No. 21-cv-61275-RAR (S.D. Fla.) ($3 million class settlement). Antullis's heavy lifting at every stage of the litigation in *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, No. 5:16-md-02752-LHK (N.D. Cal.), helped to secure a $117.5 million recovery in the largest data breach in history. Antullis successfully defeated two rounds of dispositive briefing, worked with leadership and computer privacy and damages experts to plan a winning strategy for the case, and drafted an innovative motion for class certification that immediately preceded a successful mediation with defendants in that litigation. Antullis also provided meaningful "nuts-and-bolts" support in other data breach class actions, including *In re Am. Med. Collection Agency, Inc., Customer Data Sec. Breach Litig.*, No. 2:19-md-02904-MCA-MAH (D.N.J.) (representing class of LabCorp customers), and *In re Solara Med. Supplies Customer Data Breach Litig.*, No. 3:19-cv-02284-H-KSC (S.D. Cal.) ($5.06 million settlement). And she currently represents consumers in state and federal court against North Broward Hospital District for a 2021 data breach.

Antullis's other current and recent cases include: *In re Insulin Pricing Litig.*, No. 2:23-md-03080-BRM-LDW (D.N.J.) (court-appointed member of the Plaintiffs' Steering Committee representing self-funded payers in conspiracy, fraud, and antitrust claims against pharmaceutical manufacturers and pharmacy benefit managers); *In re McKinsey & Co., Inc. Nat'l Prescription Opiate Consultant Litig.*, No. 3:21-md-02996-CRB (N.D. Cal.) (representing governmental subdivisions); *In re Allergan Biocell Textured Breast Implant Prod. Liab. Litig.*, No. 2:19-md-02921-BRM-ESK (D.N.J.) (court-appointed member of the Plaintiffs' Steering Committee); *Zimmerman v. The 3M Co.*, No. 1:17-cv-01062-HYJ-SJB (W.D. Mich.) (court-appointed member of the Plaintiffs' Steering Committee; $54 million settlement on behalf of class of Michigan homeowners whose property was allegedly contaminated with PFAS); *In re Aqueous Film-Forming Foams Prods. Liab. Litig.*, No. 2:18-mn-02873-RMG (D.S.C.) (representing water and wastewater utility providers against AFFF manufacturers); *In re Zantac (Ranitidine) Prods. Liab. Litig.*, No. 9:20-md-02924-RLR (S.D. Fla.) (representing consumers and third-party payors); *In re Apple Inc. Device Performance Litig.*, No. 5:18-md-02827-EJD (N.D. Cal.) ($500 million settlement on behalf of consumers who purchased certain model iPhones); *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 2:16-md-02687-MCA-MAH (D.N.J.) (direct purchaser class settled in excess of $100 million); *Gardner v. StarKist Co.*, 418 F. Supp. 3d 443 (N.D. Cal. 2019); *In re FieldTurf Artificial Turf Mktg. & Sales Pracs. Litig.*, No. 3:17-md-02779-MAS-JTB (D.N.J.); *In re NHL Players' Concussion Injury Litig.*, 2015 U.S. Dist. LEXIS 38755 (D. Minn. Mar. 25, 2015); *Friedman v. AARP Inc.*, No. 2:14-cv-00034-DDP-PLA (C.D. Cal.); *In re Ford Fusion & C-Max Fuel Econ. Litig.*, No. 7:13-md-02450-KMK (S.D.N.Y.); *Looper v. FCA US LLC*, No.

5:14-cv-00700-VAP-DTB (C.D. Cal.); and *In re Aluminum Warehousing Antitrust Litig.*, 95 F. Supp. 3d 419 (S.D.N.Y. 2015), *aff'd*, 833 F.3d 151 (2d Cir. 2016).

Education

B.A., Rice University, 1999; J.D., Columbia Law School, 2003

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2024-2027; Recommended Lawyer, *The Legal 500*, 2025-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Leading Plaintiff Consumer Lawyer, *Lawdragon*, 2022-2026; Leading Lawyer in America, *Lawdragon*, 2026; National Merit Scholar, Rice University; Golden Key National Honor Society, Rice University; Nominated for *The Rice Undergraduate* academic journal, Rice University; Michael I. Sovern Scholar, Columbia Law School; Hague Appeal for Peace, Committee for a Just and Effective Response to 9/11, Columbia Law School; Columbia Mediation and Political Asylum Clinics, Columbia Law School; Harlem Tutorial Program, Columbia Law School; Journal of Eastern European Law, Columbia Law School; Columbia Law Women's Association, Columbia Law School

Stephen R. Astley | Partner

Stephen Astley is a partner in the Firm's Boca Raton office. Astley devotes his practice to representing institutional and individual shareholders in their pursuit to recover investment losses caused by fraud. He has been lead counsel in numerous securities fraud class actions across the country, helping secure significant recoveries for his clients and investors.

Most recently, Astley obtained a $434 million settlement in *In re Under Armour Sec. Litig*. The case settled just prior to the commencement of trial in Baltimore, Maryland, and represents the second largest securities fraud settlement ever in the Fourth Circuit and is among the top 50 largest such recoveries in U.S. history. Other notable settlements include: *In re Nutanix Inc. Sec. Litig*. (N.D. Cal.) ($71 million settlement); *City of Sterling Heights Gen. Emps.' Ret. Sys. v. Hospira, Inc.* (N.D. Ill.) ($60 million settlement); *In re ADT Inc. S'holder Litig.* (Fla. Cir. Ct., 15th Jud. Cir.) ($30 million settlement); *In re Red Hat, Inc. Sec. Litig.* (E.D.N.C.) ($20 million settlement); *Eshe Fund v. Fifth Third Bancorp* (S.D. Ohio) ($16 million); *City of St. Clair Shores Gen. Emps.' Ret. Sys. v. Lender Processing Servs., Inc.* (M.D. Fla.) ($14 million); and *In re Synovus Fin. Corp.* (N.D. Ga.) ($11.75 million).

Prior to joining the Firm, Astley was with the Miami office of Hunton & Williams, where he concentrated his practice on class action defense, including securities class actions and white collar criminal defense. Additionally, he represented numerous corporate clients accused of engaging in unfair and deceptive practices. Astley was also an active duty member of the United States Navy's Judge Advocate General's Corps where he was the Senior Defense Counsel for the Naval Legal Service Office Pearl Harbor Detachment. In that capacity, Astley oversaw trial operations for the Detachment and gained substantial first-chair trial experience as the lead defense counsel in over 75 courts-martial and administrative proceedings. Additionally, from 2002-2003, Astley clerked for the Honorable Peter T. Fay, U.S. Court of Appeals for the Eleventh Circuit.

Education

B.S., Florida State University, 1992; M. Acc., University of Hawaii at Manoa, 2001; J.D., University of Miami School of Law, 1997

Honors / Awards

J.D., *Cum Laude*, University of Miami School of Law, 1997; United States Navy Judge Advocate General's Corps., Lieutenant

Aelish M. Baig | Partner

Aelish Marie Baig is a partner in the Firm's San Francisco office and specializes in consumer and securities fraud actions. Baig has litigated a number of cases through jury trial, resulting in multi-million and billion dollar awards and settlements for her clients.

Baig was one of the originators of the national opioid litigation, filing among the earliest complaints against the opioid industry defendants and working on all aspects of that litigation. In 2022, Baig served as co-trial counsel in a federal bench trial in San Francisco in a case selected as a bellwether in the national multi-district opioid litigation. The team achieved combined settlements of over $350 million for San Francisco and contributed to securing more than $50 billion for local governments nationwide to be used for abatement of the national opioid epidemic. For her work in co-leading the trial team and securing a historic trial result against Walgreens for the City and County of San Francisco, she was honored by *The National Law Journal* as one of the "Elite Women of the Plaintiffs Bar" and she received "California Lawyer Attorney of the Year" by the *Daily Journal*.

Baig was also appointed to leadership in the *Juul* ($1.7 billion settlement) and *McKinsey* ($230 million settlement) MDL litigations. She was recently appointed to the Plaintiffs' Steering Committee of the national social media litigation MDL against the country's largest social media platforms (Meta, YouTube, Snapchat, and Tiktok) for fueling addiction and other mental health issues among youth. She represents numerous local and state governments and school districts across the country that have filed federal cases against opioids, McKinsey, Juul, and/or social media defendants. Baig has also prosecuted securities fraud and derivative actions obtaining millions of dollars in recoveries against corporations such as Wells Fargo, Celera, Pall, and Prudential.

Education

B.A., Brown University, 1992; J.D., Washington College of Law at American University, 1998

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2027; Best Lawyer in America, *Best Lawyers*®, 2024-2027; Recommended Lawyer, *The Legal 500*, 2023-2026; Ranked by *Chambers USA*, 2024-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Plaintiff Consumer Lawyer, *Lawdragon*, 2022-2026; Leading Lawyer in America, *Lawdragon*, 2020-2026; Leading Commercial Litigator, *Daily Journal*, 2024; Class Action/Mass Tort Litigation Trailblazer, *The National Law Journal*, 2023; Elite Women of the Plaintiffs Bar, Elite Trial Lawyers, *The National Law Journal*, 2023; Plaintiffs' Lawyers Trailblazer, *The National Law Journal*, 2021, 2023; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2023; Best Lawyer in America: One to Watch, *Best Lawyers*®, 2021-2023; Best Lawyer in Northern California: One to Watch, *Best Lawyers*®, 2021; Featured in "Lawyer Limelight" series, *Lawdragon*, 2020; Litigation Trailblazer, *The National Law Journal*, 2019; California Trailblazer, *The Recorder*, 2019; Super Lawyer, *Super Lawyers Magazine*, 2012-2013; J.D., *Cum Laude*, Washington College of Law at American University, 1998; Senior Editor, *Administrative Law Review*, Washington College of Law at American University

Randall J. Baron | Partner

Randy Baron is a partner in the Firm's San Diego office. He specializes in securities litigation, corporate takeover litigation, and breach of fiduciary duty actions. For almost two decades, Baron has headed up a team of lawyers whose accomplishments include obtaining instrumental rulings both at injunction and trial phases, and establishing liability of financial advisors and investment banks. With an in-depth understanding of merger and acquisition and breach of fiduciary duty law, an ability to work under extreme time pressures, and the experience and willingness to take a case through trial, he has been responsible for recovering more than a billion dollars for shareholders.

Notable achievements over the years include: *In re Kinder Morgan, Inc. S'holders Litig.* (Kan. Dist. Ct., Shawnee Cnty.), where Baron obtained an unprecedented $200 million common fund for former Kinder Morgan shareholders, the largest merger & acquisition class action recovery in history; *In re Dole Food Co., Inc. S'holder Litig.* (Del. Ch.), where he went to trial in the Delaware Court of Chancery on claims of breach of fiduciary duty on behalf of Dole Food Co., Inc. shareholders and obtained $148 million, the largest trial verdict ever in a class action challenging a merger transaction; and *In re Rural/Metro Corp. S'holders Litig.* (Del. Ch.), where Baron and co-counsel obtained nearly $110 million total recovery for shareholders against Royal Bank of Canada Capital Markets LLC. In *In re Del Monte Foods Co. S'holders Litig.* (Del. Ch.), he exposed the unseemly practice by investment bankers of participating on both sides of large merger and acquisition transactions and ultimately secured an $89 million settlement for shareholders of Del Monte. Baron was one of the lead attorneys representing about 75 public and private institutional investors that filed and settled individual actions in *In re WorldCom Sec. Litig.* (S.D.N.Y.), where more than $657 million was recovered, the largest opt-out (non-class) securities action in history. Most recently, Baron successfully obtained a partial settlement of $60 million in *In re Tesla Motors, Inc. S'holder Litig.*, a case that alleged that the members of the Tesla Board of Directors breached their fiduciary duties, unjustly enriched themselves, and wasted corporate assets in connection with their approval of Tesla's acquisition of SolarCity Corp. in 2016.

Education

B.A., University of Colorado at Boulder, 1987; J.D., University of San Diego School of Law, 1990

Honors / Awards

Fellow, Advisory Board, Litigation Counsel of America (LCA); Rated Distinguished by Martindale-Hubbell; Best Lawyer in America, *Best Lawyers®*, 2019-2027; Hall of Fame, *The Legal 500*, 2020-2026; Ranked by *Chambers USA*, 2016-2026; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Super Lawyer, *Super Lawyers Magazine*, 2014-2016, 2018-2020, 2026; Litigation Star, *Benchmark Litigation*, 2016-2019, 2023-2026; National Practice Area Star, *Benchmark Litigation*, 2019-2020, 2024, 2026; Lawyer of the Year: Litigation – Mergers and Acquisitions, San Diego, *Best Lawyers®*, 2026; California - Litigation Star, *Benchmark Litigation*, 2024; Lawyer of the Year: Derivatives and Futures Law, *Best Lawyers®*, 2023; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2022; Leading Lawyer in America, *Lawdragon*, 2011, 2017-2019, 2021-2022; Southern California Best Lawyer, *Best Lawyers®*, 2019-2021; Local Litigation Star, *Benchmark Litigation*, 2018, 2020; Leading Lawyer, *The Legal 500*, 2014-2019; California Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Winning Litigator, *The National Law Journal*, 2018; Titan of the Industry, *The American Lawyer*, 2018; Recommended Lawyer, *The Legal 500*, 2017; Mergers & Acquisitions Trailblazer, *The National Law Journal*, 2015-2016; Litigator of the Week, *The American Lawyer*, October 16, 2014; Attorney of the Year, *California Lawyer*, 2012; Litigator of the Week, *The American Lawyer*, October 7, 2011; J.D., *Cum Laude*, University of San Diego School of Law, 1990

James E. Barz | Partner

Jim Barz is a partner with the Firm and manages the Firm's Chicago office. Barz is an experienced trial lawyer who has been lead counsel in dozens of evidentiary and contested hearings, tried 18 cases to verdict, and argued 9 cases in the Seventh Circuit. Barz is a registered CPA, former federal prosecutor, and an adjunct professor at Northwestern University School of Law from 2008 to 2025, teaching courses on trial advocacy and class action litigation.

Barz has represented investors in securities fraud class actions that have resulted in recoveries of over $2 billion. Barz was the lead counsel in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.*, and secured a $1.21 billion recovery for investors, a case that *Vanity Fair* reported as "the corporate scandal of its era." This is the largest securities class action settlement against a pharmaceutical manufacturer and the ninth largest securities class action settlement ever. Barz was recognized as a Litigator of the Week by *The American Lawyer* for his work in the case.

Barz has also secured substantial recoveries for investors in *HCA* ($215 million, M.D. Tenn.); *Motorola* ($200 million, N.D. Ill.); *Exelon* ($173 million, N.D. Ill.); *Sprint* ($131 million, D. Kan.); *Orbital ATK* ($108 million, E.D. Va.); *Walgreens* ($105 million, N.D. Ill.); *Nutanix* ($71 million, N.D. Cal.); *Psychiatric Solutions* ($65 million, M.D. Tenn.); *Dana* ($64 million, Ohio); *Oak Street* ($60 million, N.D. Ill.); *Hospira* ($60 million, N.D. Ill.); and other matters. Jim was honored by the Judges of the United States District Court for the Northern District of Illinois with an Award for Excellence in Pro Bono Service in 2021.

Education

B.B.A., Loyola University Chicago, School of Business Administration, 1995; J.D., Northwestern University School of Law, 1998

Honors / Awards

Managing Partner You Need to Know, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Super Lawyer, *Super Lawyers Magazine*, 2018-2026; Leading Lawyer in America, *Lawdragon*, 2025-2026; Litigation Star, *Benchmark Litigation*, 2025-2026; Recommended Lawyer, *The Legal 500*, 2024; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2023; Midwest Trailblazer, *The American Lawyer*, 2022; Award for Excellence in Pro Bono Service, United States District Court for the Northern District of Illinois, 2021; Litigator of the Week, *The American Lawyer*, 2021; Leading Lawyer, Law Bulletin Media, 2018; B.B.A., *Summa Cum Laude*, Loyola University Chicago, School of Business Administration, 1995; J.D., *Cum Laude*, Northwestern University School of Law, 1998

Lea Malani Bays | Partner

Lea Malani Bays is a partner in the Firm's San Diego office. She focuses on e-discovery issues, from preservation through production, and provides counsel to the Firm's multi-disciplinary e-discovery team consisting of attorneys, forensic analysts, and database professionals. Through her role as counsel to the e-discovery team, Bays is very familiar with the various stages of e-discovery, including identification of relevant electronically stored information, data culling, predictive coding protocols, privilege, and responsiveness reviews, as well as having experience in post-production discovery through trial preparation. Through speaking at various events, she is also a leader in shaping the broader dialogue on e-discovery issues.

Bays was recently part of the litigation team that earned the approval of a $131 million settlement in favor of plaintiffs in *Bennett v. Sprint Nextel Corp*. The settlement, which resolved claims arising from Sprint Corporation's ill-fated merger with Nextel Communications in 2005, represents a significant recovery for the plaintiff class, achieved after five years of tireless effort by the Firm. Prior to joining Robbins Geller, Bays was a Litigation Associate at Kaye Scholer LLP's New York office. She has experience in a wide range of litigation, including complex securities litigation, commercial contract disputes, business torts, antitrust, civil fraud, and trust and estate litigation.

Education

B.A., University of California, Santa Cruz, 1997; J.D., New York Law School, 2007

Honors / Awards

Law360 Distinguished Legal Writing Award, *The Burton Awards Program*, 2025; Ranked by *Chambers USA*, 2019-2022; J.D., *Magna Cum Laude*, New York Law School, 2007; Executive Editor, *New York Law School Law Review*; Legal Aid Society's Pro Bono Publico Award; NYSBA Empire State Counsel; Professor Stephen J. Ellmann Clinical Legal Education Prize; John Marshall Harlan Scholars Program, Justice Action Center

Alexandra S. Bernay | Partner

Alexandra Bernay is a partner in the Firm's San Diego office, where she specializes in antitrust and unfair competition class-action litigation. She has also worked on some of the Firm's largest securities fraud class actions, including the *Enron* litigation, which recovered an unprecedented $7.2 billion for investors.

Bernay currently serves as co-lead counsel in *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, in which a settlement of $5.5 billion was upheld by the Second Circuit Court of Appeals. This case was brought on behalf of millions of U.S. merchants against Visa and MasterCard and various card-issuing banks, challenging the way these companies set and collect tens of billions of dollars annually in merchant fees. The settlement is believed to be the largest antitrust class action settlement of all time.

Additionally, Bernay is litigating *In re American Airlines/JetBlue Antitrust Litig.*, a large antitrust case pending in the Eastern District of New York. That case is brought on behalf of airline passengers who overpaid for tickets because of alleged anticompetitive conduct between American Airlines and JetBlue. Bernay was recently named as co-lead counsel in *In re HVAC Equipment Antitrust Litigation*, No. 2:26-cv-10949-SKD-APP (E.D. Mich.) (representing putative class of direct purchasers). She is also part of the litigation team in a nationwide class action against LiveNation on behalf of concert ticket buyers.

Other representative cases include *In re Remicade Antitrust Litig.*, a large case that settled for $25 million involving anticompetitive conduct in the biosimilars market, where the Firm was sole lead counsel for the end-payor plaintiffs, and *In re Dealer Mgmt. Sys. Antitrust Litig.*, which involves anticompetitive conduct related to dealer management systems on behalf of auto dealerships across the country. Another representative case is against Lloyd's of London. That action is a massive civil RICO case against the insurance company and its syndicates.

Bernay has also had experience in large consumer class actions, including *In re Checking Account Overdraft Litig.*, which case was brought on behalf of bank customers who were overcharged for debit card transactions and resulted in more than $500 million in settlements with major banks that manipulated customers' debit transactions to maximize overdraft fees. She also helped try to verdict a case against one of the world's largest companies who was sued on behalf of consumers. Her more recent trial experience includes a jury trial related to foreign exchange trading against one of the largest banks in the world, where the jury found that plaintiffs had proved a conspiracy as to a large network of banks. She was responsible for many of the successful trial motions in the case.

Education

B.A., Humboldt State University, 1997; J.D., University of San Diego School of Law, 2000

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2023-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2024; Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2023; Distinguished Alumni, Forever Humboldt Alumni Association, 2023; Litigator of the Week, *Global Competition Review*, October 1, 2014

Kenneth J. Black | Partner

Kenneth Black is a partner in the Firm's San Francisco office, where his practice focuses on complex securities litigation and shareholder derivative litigation. Before joining the Firm, Black was a Sanctions Investigator at the Office of Foreign Assets Control, U.S. Treasury Department, where he investigated and assembled the evidentiary cases against targets of U.S. financial sanctions, and tracked the finances and assets of those targets.

Education

B.A., University of Michigan, 2004; M.A., American University, 2007; J.D., University of Michigan Law School, 2013

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2024-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2026; 500 X – The Next Generation, *Lawdragon*, 2023-2025; Comments Editor, *Michigan Journal of Private Equity & Venture Capital Law*, University of Michigan Law School

Erin W. Boardman | Partner

Erin Boardman is a partner in the Firm's Melville office, where her practice focuses on representing individual and institutional investors in class actions brought pursuant to the federal securities laws. She has been involved in the prosecution of numerous securities class actions that have resulted in millions of dollars in recoveries for defrauded investors, including: *Medoff v. CVS Caremark Corp*. (D.R.I.) ($48 million recovery); *Construction Laborers Pension Tr. of Greater St. Louis v. Autoliv Inc*. (S.D.N.Y.) ($22.5 million recovery); *In re Gildan Activewear Inc. Sec. Litig*. (S.D.N.Y.) (resolved as part of a $22.5 million global settlement); *In re L.G. Phillips LCD Co., Ltd., Sec. Litig*. (S.D.N.Y.) ($18 million recovery); *In re Giant Interactive Grp., Inc. Sec. Litig*. (S.D.N.Y.) ($13 million recovery); *In re Coventry HealthCare, Inc. Sec. Litig*. (D. Md.) ($10 million recovery); *Lenartz v. American Superconductor Corp*. (D. Mass.) ($10 million recovery); *Dudley v. Haub* (D.N.J.) ($9 million recovery); *Hildenbrand v. W Holding Co*. (D.P.R.) ($8.75 million recovery); *In re Doral Fin. Corp. Sec. Litig*. (D.P.R.) ($7 million recovery); and *Van Dongen v. CNinsure Inc*. (S.D.N.Y.) ($6.625 million recovery). During law school, Boardman served as Associate Managing Editor of *the Journal of Corporate, Financial and Commercial Law*, interned in the chambers of the Honorable Kiyo A. Matsumoto in the United States District Court for the Eastern District of New York, and represented individuals on a *pro bono* basis through the Workers' Rights Clinic.

Education

B.A., State University of New York at Binghamton, 2003; J.D., Brooklyn Law School, 2007

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2022-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2022-2026; Rising Star, *Super Lawyers Magazine*, 2015-2018; B.A., *Magna Cum Laude*, State University of New York at Binghamton, 2003

Nicolle B. Brito | Partner

Nicolle Brito is a partner in the Firm's Florida office. Her practice focuses on complex class actions and MDLs, covering consumer fraud, public nuisance, racketeering, conspiracy, environmental, and privacy litigation.

Brito currently represents numerous school boards and counties in the social media youth addiction MDL (*In re Social Media Adolescent Addiction/Personal Injury Prods. Liab. Litig.*, No. 4:22-md-03047-YGR (N.D. Cal.)), and is counsel to the State of Arkansas in its own enforcement suits against tech titans Meta and YouTube (*Arkansas, ex rel. Griffin v. Meta Platforms, Inc.*, No. 57CV-23-47 (Ark. Cir. Ct., Polk Cnty.), and *Arkansas, ex rel. Griffin v. Alphabet Inc.*, No. 54CV-24-258 (Ark. Cir. Ct., Phillips Cnty.)). She is also currently working on the AFFF (aqueous firefighting foam) MDL (*In re Aqueous Film-Forming Foams Prods. Liab. Litig.*, No. 2:18-mn-02873-RMG (D.S.C.)), representing governmental entities for PFAS contamination. All told, the AFFF cases have resulted in recoveries of over $12 billion from chemical giants such as 3M, DuPont, Tyco, and BASF.

In prior years, Brito was a part of the Firm's team leading the effort on behalf of cities and counties around the country in the opioid epidemic MDL (*In re Nat'l Prescription Opiate Litig.*, No. 1:17-md-02804-DAP (N.D. Ohio)), where, among other things, she was a member of the winning trial team in San Francisco's bellwether trial before Judge Breyer against Allergan, Teva, Walgreens, and others in the prescription opioid supply chain (*City & Cnty. of San Francisco v. Purdue Pharma L.P.*, No. 3:18-cv-07591-CRB (N.D. Cal.)), which ultimately yielded a $350 million post-liability verdict settlement. She also worked on notable data breach cases such as *In re Luxottica of Am., Inc. Data Sec. Breach Litig.*, No. 1:20-cv-00908-MRB (S.D. Ohio), and *In re Lakeview Loan Servicing Data Breach Litig.*, No. 1:22-cv-20955-DPG (S.D. Fla.), where she significantly contributed through all phases of litigation and helped yield weighty recoveries for the respective classes.

Before joining the Firm, Brito worked in complex arbitration, insurance, and personal injury law, where she gained significant litigation experience.

Education

B.A., Florida International University, 2003; J.D., Nova Southeastern University Shepard Broad College of Law, 2007

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2027; Leading Plaintiff Consumer Lawyer, *Lawdragon*, 2025-2026; Best Lawyer in America: One to Watch, *Best Lawyers*®, 2026; 500 X - The Next Generation, *Lawdragon*, 2023; J.D., *Cum Laude*, Nova Southeastern University Shepard Broad College of Law, 2007

Luke O. Brooks | Partner

Luke Brooks is a partner in the Firm's securities litigation practice group in the San Diego office. He focuses primarily on securities fraud litigation on behalf of individual and institutional investors, including state and municipal pension funds, Taft-Hartley funds, and private retirement and investment funds. Brooks served as trial counsel in *Jaffe v. Household International* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Other prominent cases recently prosecuted by Brooks include *Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.*, in which plaintiffs recovered $388 million for investors in J.P. Morgan residential mortgage-backed securities, and a pair of cases – *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.* ("Cheyne") and *King County, Washington, et al. v. IKB Deutsche Industriebank AG* ("Rhinebridge") – in which plaintiffs obtained a settlement, on the eve of trial in Cheyne, from the major credit rating agencies and Morgan Stanley arising out of the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles. *Reuters* described the settlement as a "landmark" deal and emphasized that it was the "first time S&P and Moody's have settled accusations that investors were misled by their ratings." An article published in *Rolling Stone* magazine entitled "The Last Mystery of the Financial Crisis" similarly credited Robbins Geller with uncovering "a mountain of evidence" detailing the credit rating agencies' fraud. Most recently, Brooks served as lead counsel in *Smilovits v. First Solar, Inc.*, and obtained a $350 million settlement on the eve of trial. The settlement is fifth-largest PSLRA settlement ever recovered in the Ninth Circuit.

Education

B.A., University of Massachusetts at Amherst, 1997; J.D., University of San Francisco, 2000

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2027; Global Plaintiff Lawyer, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Lawyer in America, *Lawdragon*, 2026; Litigation Star, *Benchmark Litigation*, 2023-2026; California - Litigation Star, *Benchmark Litigation*, 2024; Local Litigation Star, *Benchmark Litigation*, 2017-2018, 2020; California Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Recommended Lawyer, *The Legal 500*, 2017-2018; Member, *University of San Francisco Law Review*, University of San Francisco

Spencer A. Burkholz | Partner

Spence Burkholz is a partner in the Firm's San Diego office and a member of the Firm's Management Committee. He has over 25 years of experience in prosecuting securities class actions and private actions on behalf of large institutional investors. Burkholz was one of the lead trial attorneys in *Jaffe v. Household International* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Burkholz has also recovered billions of dollars for injured shareholders in cases such as *Enron* ($7.2 billion), *WorldCom* ($657 million), *Countrywide* ($500 million), *Qwest* ($445 million), *Wells Fargo* ($300 million), *Envision* ($177.5 million), *McKesson* ($141 million), *Cardinal Health* ($109 million), and *Cisco Systems* ($99.25 million).

Education

B.A., Clark University, 1985; J.D., University of Virginia School of Law, 1989

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Best Lawyer in America, *Best Lawyers®*, 2018-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; San Diego Elite Lawyer, *The Legal 500*, 2026; Leading Lawyer in America, *Lawdragon*, 2018-2026; Litigation Star, *Benchmark Litigation*, 2023-2026; National Practice Area Star, *Benchmark Litigation*, 2020, 2024-2026; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2024; Top 20 Trial Lawyer in California, *Benchmark Litigation*, 2019, 2023-2024; Titan of the Plaintiffs Bar, *Law360*, 2024; Top Plaintiff Lawyer, *Daily Journal*, 2017, 2023; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2020, 2022; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2022; Southern California Best Lawyer, *Best Lawyers®*, 2018-2021; Super Lawyer, *Super Lawyers Magazine*, 2015-2016, 2020; Top 100 Trial Lawyer, *Benchmark Litigation*, 2018-2020; Local Litigation Star, *Benchmark Litigation*, 2015-2018, 2020; Lawyer of the Year, *Best Lawyers®*, 2020; Recommended Lawyer, *The Legal 500*, 2017-2019; California Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Plaintiff Attorney of the Year, *Benchmark Litigation*, 2018; B.A., *Cum Laude*, Clark University, 1985; *Phi Beta Kappa*, Clark University, 1985

Michael G. Capeci | Partner

Michael Capeci is a partner in the Firm's Melville office. His practice focuses on prosecuting complex securities class action lawsuits in federal and state courts. Throughout his tenure with the Firm, Capeci has led the litigation teams prosecuting numerous class action cases in federal and/or state court alleging violations of the Securities Exchange Act of 1934 and/or the Securities Act of 1933, such as: *North Collier Fire Control & Rescue Dist. Firefighters' Pension Plan v. Mercury Sys., Inc.* ($32.5 million recovery); *Strougo v. Mallinckrodt plc* ($46 million recovery); *Gordon v. Vanda Pharms., Inc.* ($11.5 million recovery); *Nayani v. LifeStance Health Grp., Inc.* ($50 million recovery); and *Chester Cnty. Emps.' Ret. Fund v. Alnylam Pharms., Inc.* ($7 million recovery). In addition, Michael has played an integral role in the teams prosecuting securities class action cases such as: *In re BHP Billiton Ltd. Sec. Litig.* ($50 million recovery); *Galestan v. OneMain Holdings, Inc.* ($9 million recovery); and *City of Pontiac Gen. Emps.' Ret. Sys. v. Lockheed Martin Corp.* ($19.5 million recovery).

Education

B.S., Villanova University, 2007; J.D., Hofstra University School of Law, 2010

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2022-2026; 500 X – The Next Generation, *Lawdragon*, 2023-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2025-2026; Rising Star, *Super Lawyers Magazine*, 2014-2021; J.D., *Cum Laude,* Hofstra University School of Law, 2010

Rachel A. Cocalis | Partner

Rachel Cocalis is a partner in the Firm's San Diego office. She represents pension funds and class members in securities fraud class actions. Cocalis was on the team of Robbins Geller attorneys who obtained a $97.5 million recovery in *Marcus v. J.C. Penney Company, Inc.*

Most recently, Cocalis was a key member of the Robbins Geller litigation team in *Monroe County Employees' Retirement System v. The Southern Company* in which a $87.5 million settlement was reached after three years of litigation. The settlement resolved claims for violations of the Securities Exchange Act of 1934 stemming from defendants' issuance of materially misleading statements and omissions regarding the status of construction of a first-of-its-kind "clean coal" power plant that was designed to transform coal into synthetic gas that could then be used to fuel the power plant. Cocalis was also on the litigation team that obtained a settlement of up to $85 million in *In re Morning Song Bird Food Litigation*, resolving claims that Scotts Miracle-Gro knowingly sold wild bird food treated with pesticides that are hazardous to birds.

Education

B.A., Princeton University, 2010; J.D., University of California, Hastings College of the Law, 2016

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers®*, 2026-2027; 500 X - The Next Generation, *Lawdragon*, 2024, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2025-2026; Rising Star, *Super Lawyers Magazine*, 2025-2026; J.D., *magna cum laude*, University of California, Hastings College of the Law, 2016; B.A., High Honors, Princeton University, 2010

Brian E. Cochran | Partner

Brian Cochran is a partner in the Firm's San Diego office. He focuses his practice on complex securities, shareholder, consumer protection, and ERISA litigation. Cochran specializes in case investigation and initiation and lead plaintiff issues arising under the Private Securities Litigation Reform Act of 1995. He has developed dozens of cases under the federal securities laws and recovered billions of dollars for injured investors and consumers. Several of Cochran's cases have pioneered new ground – such as cases related to artificial intelligence ("AI"), on behalf of cryptocurrency investors, and in blank check companies (a.k.a. "SPACs") – and sparked follow-on governmental investigations into corporate malfeasance.

Cochran was a member of the litigation team that achieved a $1.21 billion settlement in the *Valeant Pharmaceuticals* securities litigation. Cochran also developed the *Dynamic Ledger* securities litigation, one of the first cases to challenge a cryptocurrency issuer's failure to register under the federal securities laws, which settled for $25 million. In addition, Cochran was part of the team that secured a historic $25 million settlement on behalf of Trump University students, which Cochran prosecuted on a *pro bono* basis. Examples of other notable recoveries include: *Rite Aid Merger* ($192.5 million); *Exelon* ($173 million); *Alta Mesa* ($126.3 million); *Micro Focus* ($107.5 million); *Walgreens* ($105 million); *VMWare* ($102.5 million); *PG&E* ($100 million); *Scotts Miracle-Gro* (up to $85 million); *Amgen* ($74 million, subject to court approval); *Shoals* ($70 million, subject to court approval); *Psychiatric Solutions* ($65 million); *SQM Chemical & Mining Co. of Chile* ($62.5 million); *GE ERISA* ($61 million); *HPE-DXC Merger* ($47.5 million); *Grubhub* ($42 million); *Sea, Ltd.* ($40 million); *Big Lots* ($38 million); *Credit Suisse* ($32.5 million); *Waste Management* ($30 million); *GoHealth* ($29.5 million); *Reckitt Benckiser* ($19.6 million); *DouYu* ($15 million); *REV Group* ($14.25 million); *Fifth Street Finance* ($14 million); *Third Avenue Management* ($14 million); and *Funko* ($14 million).

Education

A.B., Princeton University, 2006; J.D., University of California at Berkeley School of Law, Boalt Hall, 2012

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2025-2027; Best Lawyer in America, *Best Lawyers®*, 2025-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Future Star, *Benchmark Litigation*, 2026; Leading Lawyer, *The Legal 500*, 2024-2025; 500 X – The Next Generation, *Lawdragon*, 2023-2024; 40 & Under List, *Benchmark Litigation*, 2021, 2023-2024; Next Generation Partner, *The Legal 500*, 2020-2023; Rising Star, *Super Lawyers Magazine*, 2020-2022; Rising Star, *The Legal 500*, 2019; A.B., with Honors, Princeton University, 2006; J.D., Order of the Coif, University of California at Berkeley School of Law, Boalt Hall, 2012

Mark Conover | Partner

Mark Conover is a partner with Robbins Geller, based in the Firm's San Diego office. With over 50 felony jury trials and a distinguished career as a former federal prosecutor, Conover brings a wealth of trial experience to the Firm. He focuses on complex investigations, securities fraud litigation, and high-stakes trials, drawing on his extensive background in handling large-scale financial fraud, public corruption, and corporate misconduct cases.

Conover began his legal career as a litigation associate at Luce, Forward, Hamilton & Scripps LLP, before joining the U.S. Attorney's Office for the Southern District of California. There, he rose through the ranks to serve as second-in-command, overseeing the day-to-day administration of one of the largest U.S. Attorney's offices in the nation. At the U.S. Attorney's Office, Conover also served as Chief of the Major Frauds and Public Corruption Section, where he oversaw the prosecution of complex cases that resulted in groundbreaking convictions and exceptional outcomes. He played a key role in prosecuting high-profile cases, including the conviction of a sitting U.S. Congressman.

Throughout his tenure at the U.S. Attorney's Office, Conover prosecuted and convicted high-level executives at publicly traded companies and led investigations into violations of the Foreign Corrupt Practices Act (FCPA). His strategic collaborations with agencies such as the FBI, IRS, SEC, and DOJ have been instrumental in tackling multi-jurisdictional investigations and holding corporate and government wrongdoers accountable. These experiences gave him invaluable insights into the investigation of securities fraud by the DOJ and the SEC.

In addition to his legal practice, Conover has served as an adjunct professor at California Western School of Law for over a decade, mentoring the next generation of lawyers. He also served for many years as a DOJ mediator, successfully resolving disputes across the country.

Education

B.S., Utah Valley University, 2001; J.D., University of Southern California School of Law, 2004

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2026-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2026

Sheri M. Coverman | Partner

Sheri Coverman is a partner in the Firm's Boca Raton office. Her practice focuses on complex class actions, including securities, corporate governance, and consumer fraud litigation.

Coverman is a member of the Firm's Institutional Outreach Team, which provides advice to the Firm's institutional clients, including numerous public pension systems and Taft-Hartley funds throughout the United States, on issues related to corporate fraud, shareholder litigation, and corporate governance issues. Coverman frequently addresses trustees regarding their options for seeking redress for losses due to violations of securities laws and assists in ongoing litigation involving many Firm clients. Coverman's institutional clients are also involved in other types of class actions, namely: *In re National Prescription Opiate Litigation*.

Education

B.A., University of Florida, 2008; J.D., University of Florida Levin College of Law, 2011

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2026

Joseph D. Daley | Partner

Joseph Daley is a partner in the Firm's San Diego office, serves on the Firm's Securities Hiring Committee, and is a member of the Firm's Appellate Practice Group. Precedents include: *City of Birmingham Ret. & Relief Sys. v. Davis*, 806 F. App'x 17 (2d Cir. 2020); *City of Providence v. Bats Glob. Mkts., Inc.*, 878 F.3d 36 (2d Cir. 2017); *DeJulius v. New Eng. Health Care Emps. Pension Fund*, 429 F.3d 935 (10th Cir. 2005); *Fikes Wholesale, Inc. v. Visa U.S.A., Inc.*, 62 F.4th 704 (2d Cir. 2023); *Frank v. Dana Corp.* ("*Dana I*"), 547 F.3d 564 (6th Cir. 2008); *Frank v. Dana Corp.* ("*Dana II*"), 646 F.3d 954 (6th Cir. 2011); *Freidus v. Barclays Bank PLC*, 734 F.3d 132 (2d Cir. 2013); *In re HealthSouth Corp. Sec. Litig.*, 334 F. App'x 248 (11th Cir. 2009); *In re Merck & Co. Sec., Derivative & ERISA Litig.*, 493 F.3d 393 (3d Cir. 2007); *In re Martin*, 2026 U.S. App. LEXIS 25216 (11th Cir. Aug. 19, 2026) (mandamus petition grant); *In re Quality Sys., Inc. Sec. Litig.*, 865 F.3d 1130 (9th Cir. 2017); *In re Qwest Commc'ns Int'l*, 450 F.3d 1179 (10th Cir. 2006); *Luther v. Countrywide Home Loans Servicing LP*, 533 F.3d 1031 (9th Cir. 2008); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.*, 693 F.3d 145 (2d Cir. 2012); *Rosenbloom v. Pyott* ("*Allergan*"), 765 F.3d 1137 (9th Cir. 2014); *San Diego Cnty. Emps. Ret. Ass'n v. Johnson & Johnson*, 2025 WL 2176586 (3d Cir. July 30, 2025), *cert. denied*, 2026 WL 1052034 (U.S. Apr. 20, 2026); *Silverman v. Motorola Sols., Inc.*, 739 F.3d 956 (7th Cir. 2013); *Siracusano v. Matrixx Initiatives, Inc.*, 585 F.3d 1167 (9th Cir. 2009), *aff'd*, 563 U.S. 27 (2011); and *Southland Sec. Corp. v. INSpire Ins. Sols. Inc.*, 365 F.3d 353 (5th Cir. 2004). Daley is admitted to practice before the U.S. Supreme Court, as well as before 12 U.S. Courts of Appeals around the nation.

Education

B.S., Jacksonville University, 1981; J.D., University of San Diego School of Law, 1996

Honors / Awards

Best Lawyer in America, *Best Lawyers*®, 2024-2027; Seven-time Super Lawyer, *Super Lawyers Magazine*; Appellate Moot Court Board, Order of the Barristers, University of San Diego School of Law; Best Advocate Award (Traynore Constitutional Law Moot Court Competition), First Place and Best Briefs (Alumni Torts Moot Court Competition and USD Jessup International Law Moot Court Competition)

Stuart A. Davidson | Partner

Stuart Davidson is a partner in the Firm's Boca Raton office and co-head of the Firm's Consumer Practice Group. His practice focuses on complex consumer class actions, including cases involving deceptive and unfair trade practices, privacy and data breach issues, and antitrust violations.

He has served as class counsel in some of the nation's most significant privacy and consumer cases, including: *In re Facebook Biometric Information Privacy Litigation*, No. 3:15-cv-03747-JD (N.D. Cal.) ($650 million recovery in a cutting-edge class action concerning Facebook's alleged privacy violations through its collection of user's biometric identifiers without informed consent); *In re Yahoo! Inc. Customer Data Security Breach Litigation*, No. 5:16-md-02752-LHK (N.D. Cal.) ($117.5 million recovery in the largest data breach in history); *Kehoe v. Fidelity Federal Bank & Trust*, No. 9:03-cv-80593-DTKH (S.D. Fla.) ($50 million recovery in Driver's Privacy Protection Act case on behalf of half-a-million Florida drivers against a national bank); *In re Lakeview Loan Servicing Data Breach Litigation*, No. 1:22-cv-20955-DPG (S.D. Fla.) ($26 million recovery); *In re Independent Living Systems Data Breach Litigation*, No. 1:23-cv-21060-KMW (S.D. Fla.) ($14 million recovery); *In re Fortra File Transfer Software Data Security Breach Litigation*, No. 1:24-md-03090-RAR (S.D. Fla.) ($20 million recovery, representing Aetna patients); *In re American Financial Resources, Inc. Data Breach Litigation*, No. 2:22-cv-01757-MCA-JSA (D.N.J.) ($2.5 million recovery); *In re Sony Gaming Networks & Customer Data Security Breach Litigation*, No. 3:11-md-02258-AJB-MDD (S.D. Cal.) (settlement valued at $15 million concerning the massive data breach of Sony's PlayStation Network); and *In re Solara Medical Supplies Data Breach Litigation*, No. 3:19-cv-02284-H-KSC (S.D. Cal.) ($5 million all-cash settlement for 114,000 victims of healthcare data breach).

Davidson currently serves as Plaintiffs' Co-Lead Counsel in *In re Nitrogen, Phosphorus, Potassium (NPK) Fertilizer Antitrust Litigation*, No. 6:26-md-03187-EFM-BGS (D. Kan.) (representing direct purchaser plaintiffs); *In re Perry Johnson & Associates Medical Transcription Data Security Breach Litigation*, No. 1:24-md-03096-RPK-LGD (E.D.N.Y.); *In re Robinhood Prediction Market Litigation*, No. 3:26-cv-03415-EMC (N.D. Cal.); *In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation*, No. 2:19-md-02904-MCA-MAH (D.N.J.) (representing class of LabCorp customers); *In re HVAC Equipment Antitrust Litigation*, No. 2:26-cv-10949-SKD-APP (E.D. Mich.) (representing putative class of direct purchasers); and *Garner v. Amazon.com, Inc.*, No. 2:21-cv-00750-RSL (W.D. Wash.) (certified class of 100 million Amazon Alexa registrants alleging Amazon's deceptive advertising for Alexa-enabled devices); and on Plaintiffs' Steering Committee in *In re FTX Cryptocurrency Exchange Collapse Litigation*, No. 1:23-md-03076-KMM (S.D. Fla.).

Davidson also spearheaded several aspects of *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices & Antitrust Litigation*, No. 2:17-md-02785-DDC-TJJ (D. Kan.) ($609 million total recovery achieved weeks prior to trial in certified class action alleging antitrust claims involving the illegal reverse payment settlement to delay the generic EpiPen, which allowed the prices of the life-saving EpiPen to rise over 600% in 9 years), served as Co-Lead Class Counsel in three cases brought against Genworth Life Insurance Company on behalf of long-term care insureds, *Skochin v. Genworth Life. Ins. Co.*, No. 3:19-cv-00049-REP (E.D. Va.); *Halcom v. Genworth Life Ins. Co.*, No. 3:21-cv-00019-REP (E.D. Va.); and *Haney v. Genworth Life Ins. Co.*, No. 3:22-cv-00055-REP (E.D. Va.), recovering hundreds of millions of dollars in cash damages for policyholders, and served as Plaintiffs' Co-Lead Counsel in *In re NHL Players' Concussion Injury Litigation*, No. 0:14-md-02551-SRN-BRT (D. Minn.) (representing retired National Hockey League players in multidistrict litigation suit against the NHL regarding injuries suffered due to repetitive head trauma and concussions), and in *In re Pet Food Products Liability Litigation*, No. 1:07-cv-02867-NLH-AMD (D.N.J.) ($24 million recovery in multidistrict consumer class action on behalf of thousands of aggrieved pet owners nationwide against some of the nation's largest pet food manufacturers, distributors, and retailers). He also served as Plaintiffs' Co-Lead Counsel in *In re*

UnitedGlobalCom, Inc. Shareholder Litigation, C.A. No. 1012-VCS (Del. Ch.) ($25 million recovery weeks before trial); *In re Winn-Dixie Stores, Inc. Shareholder Litigation*, No. 16-2011-CA-010616 (Fla. Cir. Ct.) ($11.5 million recovery for former Winn-Dixie shareholders following the corporate buyout by BI-LO); and *In re AuthenTec, Inc. Shareholder Litigation*, No. 5-2012-CA-57589 (Fla. Cir. Ct.) ($10 million recovery for former AuthenTec shareholders following a merger with Apple). The latter two cases are the two largest merger and acquisition recoveries in Florida history.

Davidson is a former lead assistant public defender in the Felony Division of the Broward County, Florida Public Defender's Office. During his tenure at the Public Defender's Office, he tried over 30 jury trials and defended individuals charged with major crimes ranging from third-degree felonies to life and capital felonies.

Education

B.A., State University of New York at Geneseo, 1993; J.D., Nova Southeastern University Shepard Broad College of Law, 1996

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2024-2027; Best Lawyer in America, *Best Lawyers®*, 2026-2027; Recommended Lawyer, *The Legal 500*, 2023-2026; Managing Partner You Need to Know, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2020-2026; Leading Plaintiff Consumer Lawyer, *Lawdragon*, 2022-2026; Leading Lawyer in America, *Lawdragon*, 2023-2026; Litigation Star, *Benchmark Litigation*, 2023-2026; Law360 Distinguished Legal Writing Award, *The Burton Awards Program*, 2025; Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2022; Super Lawyer, *Super Lawyers Magazine*, 2021-2022; One of "Florida's Most Effective Lawyers" in the Privacy category, American Law Media, 2020; J.D., *Summa Cum Laude*, Nova Southeastern University Shepard Broad College of Law, 1996; Associate Editor, *Nova Law Review*, Book Awards in Trial Advocacy, International Law, and Criminal Pretrial Practice

Jason C. Davis | Partner

Jason Davis is a partner in the Firm's San Francisco office where he practices securities class actions and complex litigation involving equities, fixed-income, synthetic, and structured securities issued in public and private transactions. Davis was on the trial team in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Most recently, he was part of the litigation team in *Luna v. Marvell Tech. Grp., Ltd.*, resulting in a $72.5 million settlement that represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors.

Before joining the Firm, Davis focused on cross-border transactions, mergers and acquisitions at Cravath, Swaine and Moore LLP in New York.

Education

B.A., Syracuse University, 1998; J.D., University of California at Berkeley, Boalt Hall School of Law, 2002

Honors / Awards

B.A., *Summa Cum Laude*, Syracuse University, 1998; International Relations Scholar of the year, Syracuse University; Teaching fellow, examination awards, Moot court award, University of California at Berkeley, Boalt Hall School of Law

Mark J. Dearman | Partner

Mark Dearman is a partner in the Firm's Boca Raton office, where his practice focuses on consumer fraud, securities fraud, mass torts, antitrust, and whistleblower litigation.

Dearman, along with other Robbins Geller attorneys, is currently leading the effort on behalf of cities and counties around the country in *In re National Prescription Opiate Litigation*, No. 1:17-md-02804-DAP (N.D. Ohio). He was appointed to the Plaintiffs' Steering Committee in *In re Insulin Pricing Litigation*, No. 2:23-md-03080 (D.N.J.). Robbins Geller is working with a coalition of other nationally prominent law firms to investigate and bring cases on behalf of states, counties, cities, and other entities who maintain self-funded healthcare plans and who have been harmed as a result of their purchases of, or reimbursements for, overpriced insulin medication. Dearman is currently on the Plaintiffs' Executive Committee in *In re ZF-TRW Airbag Control Units Products Liability Litigation*, No. 2:19-ml-02905 (C.D. Cal.), involving an alleged defect in airbag control units found in more than 15 million vehicles nationwide. Plaintiffs allege the defendants misled consumers and caused them to overpay for vehicles with dangerously defective airbag and seat belt systems. The litigation team has secured over $290 million in settlement benefits from several of the automotive defendants and continue to litigate claims against the remaining defendants. Dearman was also appointed to the Plaintiffs' Steering Committee in *In re Zantac (Ranitidine) Products Liability Litigation*, No. 9:20-md-02924-RLR (S.D. Fla.), and as Chair of the Plaintiffs' Executive Committee in *In re Apple Inc. Device Performance Litigation*, No. 5:18-md-02827-EJD (N.D. Cal.), where Dearman, along with co-counsel, obtained a $310 million settlement. His other recent representative cases include serving as class counsel in *In re Juul Labs, Inc., Marketing, Sales Practices, and Products Liability Litigation*, No. 3:19-md-02913-WHO (N.D. Cal.); *In re McKinsey & Co., Inc. National Prescription Opiate Consultant Litigation*, No. 3:21-md-02996-CRB (N.D. Cal.); *In re Facebook Biometric Information Privacy Litigation*, No. 3:15-cv-03747-JD (N.D. Cal.) ($650 million recovery in a class action concerning Facebook's alleged privacy violations through its collection of user's biometric identifiers without informed consent); *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices & Antitrust Litigation*, No. 2:17-md-02785-DDC-TJJ (D. Kan.) ($609 million total recovery achieved weeks prior to trial in certified class action alleging antitrust claims involving the illegal reverse payment settlement to delay the generic EpiPen); *Zimmerman v. The 3M Co. f/k/a Minnesota Mining & Manufacturing Co.*, No. 1:17-cv-1062 (W.D. Mich.) ($54 million settlement on behalf of class of Michigan homeowners whose property was allegedly contaminated with PFAS); *In re FieldTurf Artificial Turf Sales & Marketing Practices Litigation*, No. 3:17-md-02779-MAS-TJB (D.N.J.); *In re Sony Gaming Networks & Customer Data Security Breach Litigation*, 903 F. Supp. 2d 942 (S.D. Cal. 2012); *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, & Products Liability Litigation*, 2016 U.S. Dist. LEXIS 1357 (N.D. Cal. Jan. 5, 2016); *In re Aluminum Warehousing Antitrust Litigation*, 95 F. Supp. 3d 419 (S.D.N.Y. 2015); *In re Liquid Aluminum Sulfate Antitrust Litigation*, No. 2:16-md-2687-MCA-MAH (D.N.J.); *In re Winn-Dixie Stores, Inc. Shareholder Litigation*, No. 16-2011-CA-010616 (Fla. 4th Jud. Cir. Ct., Duval Cnty.); *Gemelas v. Dannon Co. Inc.*, No. 1:08-cv-00236-DAP (N.D. Ohio); and *In re AuthenTec, Inc. Shareholder Litigation*, No. 05-2012-CA-57589 (Fla. 18th Jud. Cir. Ct., Brevard Cnty.).

Education

B.A., University of Florida, 1990; J.D., Nova Southeastern University, 1993

Honors / Awards

AV rated by Martindale-Hubbell; Leading Litigator in America, *Lawdragon*, 2024-2027; Best Lawyer in America, *Best Lawyers®*, 2024-2027; Recommended Lawyer, *The Legal 500*, 2023, 2025-2026; Super Lawyer, *Super Lawyers Magazine*, 2014-2020, 2025-2026; Managing Partner You Need to Know, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2020-2026; Leading Plaintiff Consumer

Lawyer, *Lawdragon*, 2022-2026; Leading Lawyer in America, *Lawdragon*, 2023-2026; In top 1.5% of Florida Civil Trial Lawyers in *Florida Trend*'s Florida Legal Elite, 2004, 2006

Kathleen B. Douglas | Partner

Kathleen Douglas is a partner in the Firm's Boca Raton office. She focuses her practice on securities fraud class actions and consumer fraud. Most recently, Douglas and a team of Robbins Geller attorneys obtained a $1.21 billion settlement in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.*, a case that *Vanity Fair* reported as "the corporate scandal of its era" that had raised "fundamental questions about the functioning of our health-care system, the nature of modern markets, and the slippery slope of ethical rationalizations." This is the largest securities class action settlement against a pharmaceutical manufacturer and the ninth largest ever.

Douglas was also a key member of the litigation team in *In re UnitedHealth Grp. Inc. PSLRA Litig.*, in which she and team of Robbins Geller attorneys achieved a substantial $925 million recovery. In addition to the monetary recovery, UnitedHealth also made critical changes to a number of its corporate governance policies, including electing a shareholder-nominated member to the company's Board of Directors. Likewise, in *Nieman v. Duke Energy Corp.*, she and a team of attorneys obtained a $146.25 million recovery, which is the largest recovery in North Carolina for a case involving securities fraud and is one of the five largest recoveries in the Fourth Circuit. In addition, Douglas was a member of the team of attorneys that represented investors in *Knurr v. Orbital ATK, Inc.*, which recovered $108 million for shareholders and is believed to be the fourth-largest securities class action settlement in the history of the Eastern District of Virginia. Douglas has served as class counsel in several class actions brought on behalf of Florida emergency room physicians. These cases were against some of the nation's largest Health Maintenance Organizations and settled for substantial increases in reimbursement rates and millions of dollars in past damages for the class.

Education

B.S., Georgetown University, 2004; J.D., University of Miami School of Law, 2007

Honors / Awards

Leading Plaintiff Consumer Lawyer, *Lawdragon*, 2023-2026; Future Star, *Benchmark Litigation*, 2025-2026; Best Lawyer in America: One to Watch, *Best Lawyers*®, 2024-2025; 40 & Under List, *Benchmark Litigation*, 2023; 40 & Under Hot List, *Benchmark Litigation*, 2021; Rising Star, *Super Lawyers Magazine*, 2012-2017; B.S., *Cum Laude*, Georgetown University, 2004

Daniel S. Drosman | Partner

Dan Drosman is a partner in the Firm's San Diego office and a member of the Firm's Management Committee. He focuses his practice on securities fraud and other complex civil litigation and has obtained significant recoveries for investors in cases such as *Morgan Stanley*, *Cisco Systems*, *The Coca-Cola Company*, *Petco*, *PMI*, and *America West*. Drosman served as lead trial counsel in *Jaffe v. Household International* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Drosman also helped secure a $388 million recovery for investors in J.P. Morgan residential mortgage-backed securities in *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.* On a percentage basis, that settlement is the largest recovery ever achieved in an RMBS class action. Drosman also served as lead counsel in *Smilovits v. First Solar, Inc.*, and obtained a $350 million settlement on the eve of trial. The settlement is fifth-largest PSLRA settlement ever recovered in the Ninth Circuit.

Most recently, Drosman led a team of Robbins Geller attorneys to a record-breaking $809.5 million settlement in *In re Twitter, Inc. Sec. Litig.*, which settled the day before trial was set to commence. The settlement is the largest securities fraud class action recovery in the Ninth Circuit in the last decade and one of the top 20 shareholder class action settlements of all time. Drosman was part of the Robbins Geller litigation team in *Monroe County Employees' Retirement System v. The Southern Company* in which an $87.5 million settlement was reached after three years of litigation. The settlement resolved claims for violations of the Securities Exchange Act of 1934 stemming from defendants' issuance of materially misleading statements and omissions regarding the status of construction of a first-of-its-kind "clean coal" power plant that was designed to transform coal into synthetic gas that could then be used to fuel the power plant. In another recent case, Drosman and the Robbins Geller litigation team obtained a $62.5 million settlement in *Villella v. Chemical and Mining Company of Chile Inc.*, which alleged that Sociedad Química y Minera de Chile S.A. ("SQM") violated the Securities Exchange Act of 1934 by issuing materially false and misleading statements regarding the Company's failure to disclose that money from SQM was channeled illegally to electoral campaigns for Chilean politicians and political parties as far back as 2009. SQM had also filed millions of dollars' worth of fictitious tax receipts with Chilean authorities in order to conceal bribery payments from at least 2009 through fiscal year 2014.

In a pair of cases – *Abu Dhabi Commercial Bank, et al. v. Morgan Stanley & Co. Inc.* ("*Cheyne*" litigation) and *King County, Washington, et al. v. IKB Deutsche Industriebank AG* ("*Rhinebridge*" litigation) – Drosman led a group of attorneys prosecuting fraud claims against the credit rating agencies, where he is distinguished as one of the few plaintiffs' counsel to defeat the rating agencies' traditional First Amendment defense and their motions for summary judgment based on the mischaracterization of credit ratings as mere opinions not actionable in fraud.

Before joining the Firm, Drosman served as an Assistant District Attorney for the Manhattan District Attorney's Office, and an Assistant United States Attorney in the Southern District of California, where he investigated and prosecuted violations of the federal narcotics, immigration, and official corruption law.

Education

B.A., Reed College, 1990; J.D., Harvard Law School, 1993

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2026-2027; Best Lawyer in America, *Best Lawyers*®, 2019-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; San Diego Elite Lawyer, *The Legal 500*, 2026; Leading Lawyer in America, *Lawdragon*, 2018-2026; Litigation Star, *Benchmark Litigation*, 2023-2026;

National Practice Area Star, *Benchmark Litigation*, 2026; Legend, *Lawdragon*, 2025; Recommended Lawyer, *The Legal 500*, 2017-2018, 2023-2024; Lawyer of the Year, *Best Lawyers®*, 2022, 2024; West Trailblazer, *The American Lawyer*, 2022; Top Plaintiff Lawyer, *Daily Journal*, 2022; Plaintiff Litigator of the Year, *Benchmark Litigation*, 2022; Titan of the Plaintiffs Bar, *Law360*, 2022; Southern California Best Lawyers, *The Wall Street Journal*, 2021; Southern California Best Lawyer, *Best Lawyers®*, 2019-2021; Super Lawyer, *Super Lawyers Magazine*, 2017-2020; Top 100 Lawyer, *Daily Journal*, 2017; Department of Justice Special Achievement Award, Sustained Superior Performance of Duty; B.A., Honors, Reed College, 1990; *Phi Beta Kappa*, Reed College, 1990

Thomas E. Egler | Partner

Thomas Egler is a partner in the Firm's San Diego office and focuses his practice on representing clients in major complex, multidistrict litigations, such as *Lehman Brothers*, *Countrywide Mortgage Backed Securities*, *WorldCom*, *AOL Time Warner*, and *Qwest*. He has represented institutional investors both as plaintiffs in individual actions and as lead plaintiffs in class actions.

Most recently, along with co-counsel and a team of Robbins Geller attorneys, Egler led the effort on behalf of cities and counties around the country in *In re National Prescription Opiate Litigation*. In 2022, Egler served on the team of counsel in a federal bench trial in San Francisco in a case that had been selected as a bellwether in the multidistrict litigation. The team achieved combined settlements of nearly $70 million for San Francisco and more than $50 billion nationally from multiple pharmaceutical companies who were defendants in the national litigation. The Honorable Charles R. Breyer of the Northern District of California ruled that Walgreens, the only defendant remaining in the San Francisco case, was liable for its role in the opioid crisis in San Francisco.

Egler also has been a Lawyer Representative to the Ninth Circuit Judicial Conference from the Southern District of California, is a member of the Hon. William B. Enright Inn of Court in San Diego, and in the past has served on the Executive Board of the San Diego chapter of the Association of Business Trial Lawyers. Before joining the Firm, Egler was a law clerk to the Honorable Donald E. Ziegler, Chief Judge, United States District Court, Western District of Pennsylvania.

Education

B.A., Northwestern University, 1989; J.D., The Catholic University of America, Columbus School of Law, 1995

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2024-2027; Leading Lawyer in America, *Lawdragon*, 2024; Super Lawyer, *Super Lawyers Magazine*, 2017-2018; Associate Editor, *Catholic University Law Review*

Alan I. Ellman | Partner

Alan Ellman is a partner in the Firm's Melville office, where he concentrates his practice on prosecuting complex securities fraud cases on behalf of institutional investors. Most recently, Ellman was on the team of Robbins Geller attorneys who obtained a $34.5 million recovery in *Patel v. L-3 Communications Holdings, Inc.*, which represents a high percentage of damages that plaintiffs could reasonably expect to be recovered at trial and is more than eight times higher than the average settlement of cases with comparable investor losses. He was also on the team of attorneys who recovered in excess of $34 million for investors in *In re OSG Sec. Litig.*, which represented an outsized recovery of 93% of bond purchasers' damages and 28% of stock purchasers' damages. The creatively structured settlement included more than $15 million paid by a bankrupt entity.

Ellman was also on the team of Robbins Geller attorneys who achieved final approval in *Curran v. Freshpet, Inc.*, which provides for the payment of $10.1 million for the benefit of eligible settlement class members. Additionally, he was on the team of attorneys who obtained final approval of a $7.5 million recovery in *Plymouth County Retirement Association v. Advisory Board Company*. In 2006, Ellman received a Volunteer and Leadership Award from Housing Conservation Coordinators (HCC) for his *pro bono* service defending a client in Housing Court against a non-payment action, arguing an appeal before the Appellate Term, and staffing HCC's legal clinic. He also successfully appealed a *pro bono* client's criminal sentence before the Appellate Division.

Education

B.S., B.A., State University of New York at Binghamton, 1999; J.D., Georgetown University Law Center, 2003

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2017-2026; Pro Bono Publico Award, *Casa Cornelia Law Center*, 2021-2022; Rising Star, *Super Lawyers Magazine*, 2014-2015; B.S., B.A., *Cum Laude*, State University of New York at Binghamton, 1999

William J. Geddish | Partner

William Geddish is a partner with the Firm and is based in the Melville office, where his practice focuses on complex securities litigation. Before joining the Firm, he was an associate in the New York office of a large international law firm, where his practice focused on complex commercial litigation.

Since joining the Firm, Geddish has played a significant role in the following litigations*: In re Barrick Gold Sec. Litig.* ($140 million recovery); *Scheufele v. Tableau Software, Inc.* ($95 million recovery); *Landmen Partners, Inc. v. The Blackstone Grp., L.P.* ($85 million recovery); *In re Jeld-Wen Holding, Inc. Sec. Litig.* ($40 million recovery); *City of Austin Police Ret. Sys. v. Kinross Gold Corp.* ($33 million recovery); *City of Roseville Emps' Ret. Sys. v. EnergySolutions, Inc.* ($26 million recovery); *Beaver Cnty. Emps' Ret. Fund v. Tile Shop Holdings, Inc.* ($9.5 million recovery); and *Barbara Marciano v. Schell & Kampeter, Inc.* ($2 million recovery).

Education

B.A., Sacred Heart University, 2006, J.D., Hofstra University School of Law, 2009

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers®*, 2024-2025; Rising Star, *Super Lawyers Magazine*, 2013-2024; 500 X – The Next Generation, *Lawdragon*, 2023; J.D., *Magna Cum Laude*, Hofstra University School of Law, 2009; Gina Maria Escarce Memorial Award, Hofstra University School of Law

Paul J. Geller | Partner

Paul Geller is a founding partner of Robbins Geller and head of the Firm's Consumer Practice Group. Over the last 30 years, Geller has served as lead counsel in some of the country's most high-profile consumer, antitrust, and securities class actions and has recovered billions for communities, consumers, and investors harmed by corporate abuse.

Before devoting his practice to the representation of consumers and investors, Geller defended companies in high-stakes class action and multi-district litigation, providing him with an invaluable perspective from "both sides of the 'v.'" An experienced trial lawyer, he has tried bench and jury trials on behalf of plaintiffs and defendants and has argued before numerous state, federal, and appellate courts throughout the United States.

Geller's ability to earn respect and trust from all sides in difficult negotiations has been recognized by the bar and legal publications. *Chambers* notes that "Paul is a consummate professional who has the ability to work seamlessly and collaboratively to address daunting challenges that arise in complex mass tort litigation."

He serves as a key leader of the nationwide litigation against the companies responsible for the U.S. opioid addiction crisis. He played a key role in negotiating and architecting the complex settlements that resulted in over $50 billion being paid to communities across the country struggling with the fallout of the opioid crisis.

He has also successfully litigated and negotiated precedent-setting class recoveries in multiple practice areas, including data privacy, antitrust, products liability, and securities cases.

- **Facebook Data Privacy Case – $650 Million**: He secured the then-largest privacy class action settlement in history – a $650 million recovery in a cutting-edge class action against Facebook. The case concerned Facebook's use of biometric identifiers through its "tag" feature, which Geller's team challenged under a new biometric privacy law that had never before been applied in a class action. The federal judge that presided over the case called it a "landmark result" and a "major win for consumers." In addition to the monetary recovery, Facebook disabled the tag feature altogether, deleting 1 billion facial profiles and discontinuing the related facial recognition program.
- **Volkswagen "Clean Diesel" Case – $17 Billion**: Geller was a member of the leadership team representing consumers in the massive Volkswagen "Clean Diesel" emissions case. The San Francisco legal newspaper *The Recorder* labeled the group that was appointed in that case, which settled for more than $17 billion, a "class action dream team."
- **"EpiPen" Antitrust Case – $609 Million**: As co-lead counsel, Geller secured a recovery of $609 million for overcharged purchasers of the "EpiPen" device in a nationwide class action alleging that the manufacturer and marketer of the EpiPen engaged in anti-competitive and unfair business conduct in their sale and marketing of the auto-injector device. The American Antitrust Institute honored Geller and the litigation team for Outstanding Antitrust Litigation Achievement in Private Law Practice for this result.

Education

B.S., University of Florida, 1990; J.D., Emory University School of Law, 1993

Honors / Awards

Senior Fellow, Litigation Counsel of America (LCA) Proven Trial Lawyers; Rated AV by Martindale-Hubbell; Leading Litigator in America, *Lawdragon*, 2024-2027; Best Lawyer in America, *Best Lawyers®*, 2017-2027; Super Lawyer, *Super Lawyers Magazine*, 2007-2026; Recommended Lawyer, *The Legal 500*, 2016, 2019, 2023-2026; Ranked by *Chambers USA*, 2021-2026; Leading Global Litigator, *Lawdragon*, 2025-2026; Global Plaintiff Lawyer, *Lawdragon*, 2024-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Plaintiff Consumer Lawyer, *Lawdragon*, 2022-2026; Leading Lawyer in America, *Lawdragon*, 2006-2007, 2009-2026; Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2022; South Trailblazer, *The American Lawyer*, 2022; Class Action MVP, *Law360*, 2022; Florida Best Lawyer in America, *Best Lawyers®*, 2017-2021; One of "Florida's Most Effective Lawyers" in the Privacy category, American Law Media, 2020; Legend, *Lawdragon*, 2020; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2018; Lawyer of the Year, *Best Lawyers®*, 2018; Attorney of the Month, *Attorney At Law*, 2017; Featured in "Lawyer Limelight" series, *Lawdragon*, 2017; Top Rated Lawyer, South Florida's Legal Leaders, *Miami Herald*, 2015; Litigation Star, *Benchmark Litigation*, 2013; "Legal Elite," *Florida Trend Magazine*; One of "Florida's Most Effective Lawyers," American Law Media; One of Florida's top lawyers in *South Florida Business* Journal; One of the Nation's Top "40 Under 40," *The National Law Journal*; One of Florida's Top Lawyers, *Law & Politics*; Editor, *Emory Law Journal*; Order of the Coif, Emory University School of Law

Robert D. Gerson | Partner

Robert Gerson is a partner in the Firm's Melville office, where he practices securities fraud litigation and other complex matters.

Since joining the Firm, Gerson has played a significant role in prosecuting numerous high-stakes investor litigations. Most recently, Gerson and a team of Robbins Geller attorneys obtained a $27.5 million settlement in *Luna v. Carbonite, Inc.*, following a precedent-setting decision by the U.S. Court of Appeals for the First Circuit. Gerson was also a member of the team in *In re Dell Technologies Inc. Class V Stockholders Litigation*, which settled in 2023 for $1 billion in cash – a record in the Delaware Chancery Court and the largest settlement in U.S. state court history. Other notable cases Gerson has played a critical role in at the Firm include: *UA Local 13 & Employers Group Insurance Fund v. Sealed Air Corp.* ($12.5 million recovery); *In re PPDAI Group Sec. Litig.* ($9 million recovery); and *Sponn v. Emergent BioSolutions Inc.* ($6.5 million recovery).

Education

B.A., University of Maryland, 2006; J.D., New York Law School, 2009

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2021-2026; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2024-2025; 500 X – The Next Generation, *Lawdragon*, 2023; Rising Star, *Super Lawyers Magazine*, 2015-2020

Elise J. Grace | Partner

Elise Grace is a partner in the San Diego office and counsels the Firm's institutional clients on options to secure premium recoveries in securities litigation both within the United States and internationally. Grace is a frequent lecturer and author on securities and accounting fraud, and develops annual MCLE and CPE accredited educational programs designed to train public fund representatives on practices to protect and maximize portfolio assets, create long-term portfolio value, and best fulfill fiduciary duties. Grace has routinely been named a Recommended Lawyer by *The Legal 500* and named a Leading Plaintiff Financial Lawyer by *Lawdragon*. Grace has prosecuted various significant securities fraud class actions, as well as the AOL Time Warner state and federal securities opt-out litigations, which resulted in a combined settlement of over $629 million for defrauded investors. Before joining the Firm, Grace practiced at Clifford Chance, where she defended numerous Fortune 500 companies in securities class actions and complex business litigation.

Education

B.A., University of California, Los Angeles, 1993; J.D., Pepperdine School of Law, 1999

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Securities Litigation Lawyer of the Year, *Lawyer Monthly*, 2023, 2025; Recommended Lawyer, *The Legal 500*, 2016-2017; J.D., *Magna Cum Laude*, Pepperdine School of Law, 1999; American Jurisprudence Bancroft-Whitney Award – Civil Procedure, Evidence, and Dalsimer Moot Court Oral Argument; Dean's Academic Scholarship Recipient, Pepperdine School of Law; B.A., *Summa Cum Laude*, University of California, Los Angeles, 1993; B.A., *Phi Beta Kappa*, University of California, Los Angeles, 1993

Tor Gronborg | Partner

Tor Gronborg is a partner in the Firm's San Diego office and a member of the Firm's Management Committee. He often lectures on topics such as the Federal Rules of Civil Procedure and electronic discovery. Gronborg has served as lead or co-lead counsel in numerous securities fraud cases that have collectively recovered more than $4.4 billion for investors. Most recently, Gronborg and a team of Robbins Geller attorneys obtained an $809 million settlement in *In re Twitter, Inc. Sec. Litig.*, a case that did not settle until the day before trial was set to commence.

In addition to *Twitter*, Gronborg's work has included significant recoveries against corporations such as Valeant Pharmaceuticals ($1.21 billion), Cardinal Health ($600 million), Motorola ($200 million), Duke Energy ($146.25 million), Sprint Nextel Corp. ($131 million), and Prison Realty ($104 million), to name a few. Gronborg was also a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, No. SACV15-0865 (C.D. Cal.), a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial and ultimately settled for 100% of the claimed damages plus prejudgment interest.

On three separate occasions, Gronborg's pleadings have been upheld by the federal Courts of Appeals (*Broudo v. Dura Pharms., Inc.*, 339 F.3d 933 (9th Cir. 2003), *rev'd on other grounds*, 544 U.S. 336 (2005); *In re Daou Sys.*, 411 F.3d 1006 (9th Cir. 2005); *Staehr v. Hartford Fin. Servs. Grp.*, 547 F.3d 406 (2d Cir. 2008)).

Education

B.A., University of California, Santa Barbara, 1991; Rotary International Scholar, University of Lancaster, U.K., 1992; J.D., University of California, Berkeley, 1995

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2022-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Super Lawyer, *Super Lawyers Magazine*, 2013-2022, 2026; Leading Lawyer in America, *Lawdragon*, 2022-2026; Litigation Star, *Benchmark Litigation*, 2023-2026; National Practice Area Star, *Benchmark Litigation*, 2025-2026; Recommended Lawyer, *The Legal 500*, 2023-2024; West Trailblazer, *The American Lawyer*, 2022; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2019; Moot Court Board Member, University of California, Berkeley; AFL-CIO history scholarship, University of California, Santa Barbara

Ellen Gusikoff Stewart | Partner

Ellen Stewart is a partner in the Firm's San Diego office, and is a member of the Firm's Summer Associate Hiring Committee. She currently practices in the Firm's settlement department, negotiating and documenting complex securities, merger, ERISA, and derivative action settlements. Notable recent settlements include: *Evanston Police Pension Fund v. McKesson Corp.* (N.D. Cal. 2023) ($141 million); *In re Twitter Inc. Sec. Litig.* (N.D. Cal. 2022) ($809.5 million); *In re Facebook Biometric Info. Privacy Litig.* (N.D. Cal. 2021) ($650 million); *In re Am. Realty Cap. Props., Inc. Litig.* (S.D.N.Y. 2020) ($1.025 billion); *Klein v. Altria Group, Inc.* (E.D. Va. 2022) ($90 million); *KBC Asset Management v. 3D Systems Corp.* (D.S.C. 2018) ($50 million); and *Luna v. Marvell Tech. Grp.* (N.D. Cal. 2018) ($72.5 million).

Stewart has served on the Federal Bar Association Ad Hoc Committee for the revisions to the Settlement Guidelines for the Northern District of California, was a contributor to the Guidelines and Best Practices – Implementing 2018 Amendments to Rule 23 Class Action Settlement Provisions manual of the Bolch Judicial Institute at the Duke University School of Law, and speaks at conferences around country on current settlement and notice issues.

Education

B.A., Muhlenberg College, 1986; J.D., Case Western Reserve University, 1989

Honors / Awards

Rated Distinguished by Martindale-Hubbell

Robert Henssler | Partner

Bobby Henssler is a partner in the Firm's San Diego office, where he focuses his practice on securities fraud and other complex civil litigation. He has obtained significant recoveries for investors in cases such as *Under Armour*, *Blackstone*, and *J.C. Penney*.

Most recently, Henssler led a team of Robbins Geller attorneys in obtaining a $434 million settlement in *In re Under Armour Sec. Litig.* The case was previously dismissed with prejudice in 2019, but then resurrected through a highly unusual procedural maneuver, a successful motion for an indicative ruling: asking the federal judge who had dismissed the case to issue an indicative opinion informing the Fourth Circuit that he would revive the original case if it were remanded to him. Over the next five years, the Robbins Geller team defeated defendants' motions for summary judgment and to exclude plaintiffs' expert witnesses. The case settled just weeks before a jury trial was set to begin in Baltimore, Maryland. The $434 million recovery is the second largest securities-fraud settlement ever in the Fourth Circuit and is among the top 50 largest such recoveries in U.S. history.

Henssler was also lead counsel in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery achieved represents more than 30% of the aggregate classwide damages, far exceeding the typical recovery in a securities class action. Henssler has had many other successful results, including in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.* ($1.21 billion), *Marcus v. J.C. Penney Company, Inc.* ($97.5 million recovery), *Landmen Partners Inc. v. The Blackstone Group L.P.* ($85 million recovery), *In re Novatel Wireless Sec. Litig.* ($16 million recovery), *Carpenters Pension Trust Fund of St. Louis v. Barclays PLC* ($14 million settlement), and *Kmiec v. Powerwave Technologies, Inc.* ($8.2 million settlement), to name a few.

Education

B.A., University of New Hampshire, 1997; J.D., University of San Diego School of Law, 2001

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2024-2027; Best Lawyer in America, *Best Lawyers®*, 2025-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2020-2021, 2023-2026; Leading Lawyer in America, *Lawdragon*, 2025-2026; Top 100 Lawyer, *Daily Journal*, 2024; California Lawyer of the Year, *Daily Journal*, 2022; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2020; Recommended Lawyer, *The Legal 500*, 2018-2019

Steven F. Hubachek | Partner

Steve Hubachek is a partner in the Firm's San Diego office. He is a member of the Firm's appellate group, where his practice concentrates on federal appeals. He has more than 25 years of appellate experience, has argued over 100 federal appeals, including 3 cases before the United States Supreme Court and 7 cases before en banc panels of the Ninth Circuit Court of Appeals. Prior to his work with the Firm, Hubachek joined Perkins Coie in Seattle, Washington, as an associate. He was admitted to the Washington State Bar in 1987 and was admitted to the California State Bar in 1990, practicing for many years with Federal Defenders of San Diego, Inc. He also had an active trial practice, including over 30 jury trials, and was Chief Appellate Attorney for Federal Defenders.

Education

B.A., University of California, Berkeley, 1983; J.D., University of California College of the Law, San Francisco, 1987

Honors / Awards

AV rated by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2014-2022; Super Lawyer, *Super Lawyers Magazine*, 2007-2009, 2019-2021; Assistant Federal Public Defender of the Year, National Federal Public Defenders Association, 2011; Appellate Attorney of the Year, San Diego Criminal Defense Bar Association, 2011 (co-recipient); President's Award for Outstanding Volunteer Service, Mid City Little League, San Diego, 2011; E. Stanley Conant Award for exceptional and unselfish devotion to protecting the rights of the indigent accused, 2009 (joint recipient); *The Daily Transcript* Top Attorneys, 2007; J.D., *Cum Laude*, Order of the Coif, Thurston Honor Society, University of California College of the Law, San Francisco, 1987

Andrew W. Hutton | Partner

Drew Hutton is a partner in the Firm's San Diego office. Hutton has prosecuted a variety of securities actions, achieving high-profile recoveries and results. Representative cases against corporations and their auditors include *AOL Time Warner* ($2.5 billion) and *Williams Cos.* ($311 million). Representative cases against corporations and their executives include *Broadcom* ($150 million), *Bank OZK* ($45 million), and *Clarent* (class plaintiff's 10b-5 jury verdict against former CEO). Hutton is also active in shareholder derivative litigation, achieving monetary recoveries and governance changes, including *Premier* ($71 million), *Affiliated Computer Servs.* ($30 million), *KB Home* ($30 million), and *KeyCorp* (modified CEO stock options and governance). Hutton has also litigated securities cases in bankruptcy court (*WorldCom* – $15 million for individual claimant), and a complex options case before FINRA (eight-figure settlement for structured products investor).

Hutton is also experienced in complex, multi-district consumer litigation. Representative nationwide insurance cases include *Prudential* ($4 billion), *Metro. Life Ins. Co.* ($2 billion), and *Conseco Life Ins. Co.* ($200 million). Representative nationwide consumer lending cases include a $30 million class settlement of Truth-in-Lending claims against American Express, and a $24 million class settlement of RICO and RESPA claims against Community Bank of Northern Virginia (now PNC Bank).

Before joining Robbins Geller, Hutton was a public company accountant, Certified Public Accountant, and broker of stocks, options, and insurance products. Hutton has also served as an expert litigation consultant in both financial and corporate governance capacities. Hutton is often responsible for working with experts retained by the Firm in litigation and has conducted dozens of depositions of financial professionals, including audit partners, CFOs, directors, bankers, actuaries, and opposing experts.

Education

B.A., University of California, Santa Barbara, 1983; J.D., Loyola Law School, 1994

James I. Jaconette | Partner

James Jaconette is one of the founding partners of the Firm and is located in its San Diego office. He manages cases in the Firm's securities class action and shareholder derivative litigation practices. He has served as one of the lead counsel in securities cases with recoveries to individual and institutional investors totaling over $8 billion. He also advises institutional investors, including hedge funds, pension funds, and financial institutions. Landmark securities actions in which he contributed in a primary litigating role include *In re Informix Corp. Sec. Litig.*, and *In re Dynegy Inc. Sec. Litig.* and *In re Enron Corp. Sec. Litig.*, where he represented lead plaintiff The Regents of the University of California. Most recently, Jaconette was part of the trial team in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery achieved represents more than 30% of the aggregate classwide damages, far exceeding the typical recovery in a securities class action.

Education

B.A., San Diego State University, 1989; M.B.A., San Diego State University, 1992; J.D., University of California Hastings College of the Law, 1995

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; J.D., *Cum Laude*, University of California Hastings College of the Law, 1995; Associate Articles Editor, *Hastings Law Journal*, University of California Hastings College of the Law; B.A., with Honors and Distinction, San Diego State University, 1989

J. Marco Janoski Gray | Partner

Marco Janoski is a partner in the Firm's San Diego office. His practice focuses on complex securities litigation and class actions. An experienced litigator, Janoski has secured record-setting recoveries for investors, including trial verdicts and large recoveries secured on the eve of trial.

Janoski recently served on the litigation team in *In re Alphabet, Inc. Securities Litigation* representing plaintiffs in a securities fraud case where Robbins Geller achieved a $350 million recovery. The recovery is the largest ever privacy or cybersecurity-related securities class action recovery and the Ninth Circuit's largest ever securities class action recovery following a complete dismissal. Janoski also served on the litigation teams in two securities fraud cases that are among the top ten securities recoveries of 2023: *In re Envision Healthcare Corporation Securities Litigation* ($177.5 million recovery) and *Louisiana Sheriffs' Pension & Relief Fund v. Cardinal Health, Inc.* ($109 million recovery). He served on the Firm's trial team in *In re Twitter, Inc. Securities Litigation* and helped secure an $809.5 million recovery for investors. The *Twitter* case settled the day before trial was set to commence in 2021 and is the largest securities fraud class action recovery in the Ninth Circuit in the last decade. Likewise, he and a team of Firm lawyers secured a $350 million settlement on the eve of trial in 2020 in *Smilovits v. First Solar, Inc.*, the fifth-largest PSLRA settlement ever recovered in the Ninth Circuit at the time. Janoski also served on the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial in federal court.

Education

Universidad Complutense de Madrid, 2010-2011; B.A., University of California, Santa Barbara, 2011; J.D., University of California College of the Law, San Francisco (formerly UC Hastings), 2015

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2024-2027; 40 & Under List, *Benchmark Litigation*, 2023-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2023-2026; Rising Star, *Super Lawyers Magazine*, 2024-2025; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2024; 500 X – The Next Generation, *Lawdragon*, 2023; J.D., *Magna Cum Laude*, University of California College of the Law, San Francisco (formerly UC Hastings), 2015

Patton L. Johnson | Partner

Patton Johnson is a partner in the Firm's San Diego office, where he focuses on securities class actions on behalf of investors seeking redress for financial fraud.

In addition to his experience litigating securities cases, Johnson has substantial experience in financial markets and transactions. He previously represented institutional clients in connection with cross-border financings, and before practicing law he worked at an global bank in New York and as an expat in Hong Kong.

Education

B.S., University of Colorado, Boulder, 2005; J.D., University of California College of the Law, 2017

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2026-2027; J.D., *Magna Cum Laude*, University of California, Hastings College of the Law, 2017

Evan J. Kaufman | Partner

Evan Kaufman is a partner in the Firm's Melville office. He has recovered hundreds of millions of dollars for class members in securities, ERISA, and complex class actions.

Kaufman served as lead counsel in the *SandRidge Energy* securities litigation and obtained a $35.75 million global settlement, including $21.8 million for SandRidge common stock purchasers. As lead counsel in the *TD Banknorth* litigation, Kaufman and the Firm achieved a $50 million recovery after successfully objecting to a $3 million settlement submitted to the court on behalf of the class. The court in the *TD Banknorth* litigation stated: "This is one of the cases – there's probably been a half a dozen since I've been a judge that I handled which have – really through the sheer diligence and effort of plaintiffs' counsel – resulted in substantial awards for plaintiffs, after overcoming serious procedural and other barriers . . . it appears plainly from the papers that you and your co-counsel have diligently, and at great personal expense and through the devotion of many thousands of hours of your time, prosecuted this case to a successful conclusion."

Kaufman served as co-lead class counsel on behalf of 212,000 participants in General Electric's 401(k) plan and obtained $61 million for the class, which was the largest recovery ever in an ERISA case alleging a retirement plan improperly offered proprietary funds. During the *GE ERISA* final settlement approval hearing, the court described the case as "hard-fought" with "interesting and difficult issues." Kaufman served as lead counsel or as an integral part of the team in other ERISA actions, including on behalf of participants in the retirement plans of Invesco, JP Morgan, and Wakemed.

Kaufman achieved notable results in numerous other securities class actions, including recovering $26 million in the *EnergySolutions* litigation, and in cases against Lockheed Martin, State Street, Fidelity, Warner Chilcott, Talkspace, Third Avenue Management, and Giant Interactive, among others.

In the *Third Avenue Management* litigation, when approving the $14.25 million settlement obtained by Kaufman and the Firm, the court commended the parties for their "wisdom" and "diligence" and concluded that "lead counsel diligently and with quality represented the interests of the class." In the *Giant Interactive* litigation, the court acknowledged the efforts of Kaufman and the Firm in achieving the favorable settlement for the class: "The Court also recognizes the diligence and hard work of plaintiffs' counsel in achieving such a settlement, particularly in light of the fact that this case (unlike many other securities class actions) was independently developed by plaintiffs' counsel, as opposed to following, or piggybacking on, a regulatory investigation or settlement."

Education

B.A., University of Michigan, 1992; J.D., Fordham University School of Law, 1995

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2013-2015, 2017-2020, 2023-2026; Member, *Fordham International Law Journal*, Fordham University School of Law

Christopher R. Kinnon | Partner

Christopher Kinnon is a partner in the Firm's San Diego office, where his practice focuses on securities fraud litigation. Kinnon and a team of Robbins Geller attorneys obtained a $1.21 billion settlement in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.* (D.N.J.), a case that *Vanity Fair* reported as "the corporate scandal of its era" that had raised "fundamental questions about the functioning of our health-care system, the nature of modern markets, and the slippery slope of ethical rationalizations." This is the largest securities class action settlement against a pharmaceutical manufacturer and the ninth largest ever. In addition, Kinnon and a team of Robbins Geller attorneys obtained an $809 million settlement in *In re Twitter, Inc. Sec. Litig.*, a case that did not settle until the day before trial was set to commence.

Most recently, Kinnon was a key member of a team of Robbins Geller attorneys who obtained a $434 million settlement in *In re Under Armour Sec. Litig.* The case was previously dismissed with prejudice in 2019, but then resurrected through a highly unusual procedural maneuver, a successful motion for an indicative ruling: asking the federal judge who had dismissed the case to issue an indicative opinion informing the Fourth Circuit that he would revive the original case if it were remanded to him. Over the next five years, the Robbins Geller team defeated defendants' motions for summary judgment and to exclude plaintiffs' expert witnesses. The case settled just weeks before a jury trial was set to begin in Baltimore, Maryland. The $434 million recovery is the second largest securities-fraud settlement ever in the Fourth Circuit and is among the top 50 largest such recoveries in U.S. history.

Kinnon is currently representing investors in securities fraud actions against Green Dot Corporation (C.D. Cal.) and PricewaterhouseCoopers LLP (D.N.J.).

Before law school, Kinnon was a municipal sanitation worker and an elected executive board member with the Canadian Union of Public Employees, Local 1004 (CUPE 1004). Before that, he was a recording artist signed to prominent record labels in Canada and the United States.

Education

B.A., University of British Columbia, 2008; J.D., University of Michigan Law School, 2017

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2026-2027; Rising Star, *Super Lawyers Magazine*, 2024-2026; California Lawyer of the Year, *Daily Journal*, 2022

David A. Knotts | Partner

David Knotts is a partner in the Firm's San Diego office. He focuses his practice on shareholder class action litigation in the context of mergers and acquisitions, representing both individual shareholders and institutional investors. Knotts is also part of the Firm's Delaware Practice Group and has taken multiple cases to trial in the Delaware Court of Chancery. Knotts has significant trial experience in high-stakes corporate litigation.

Knotts has been counsel of record for shareholders on a number of significant recoveries in courts throughout the country, including serving as the lead litigator on *Chabot v. Walgreens Boots Alliance, Inc.*, which culminated in a $192.5 million recovery for a class of Rite Aid investors. The *Walgreens* settlement was approved by the Middle District of Pennsylvania in February 2024 and resulted in the second largest securities recovery in Pennsylvania federal court history. That recovery represents a rarity in securities fraud litigation, whereby target-company investors obtained a significant cash recovery from an unaffiliated acquirer based on allegations that the acquirer issued misleading statements during the pendency of a merger.

Knotts also served as the lead litigator in *Murray v. EarthLink Holdings Corp.*, which, after six years of litigation, resulted in an $85 million settlement for former EarthLink stockholders in connection with the Windstream/EarthLink merger. The *EarthLink* settlement was approved by the Eastern District of Arkansas in February 2025 and, at the time, resulted in the largest securities class action recovery in the Eighth Circuit over the past five years.

In addition, Knotts served among lead counsel in *In re Rural/Metro Corp. S'holders Litig.*, which resulted in a groundbreaking $110 million post-trial recovery affirmed by the Delaware Supreme Court, as well as *In re Del Monte Foods Co. S'holders Litig.* ($89.4 million), *Websense* ($40 million), *In re Onyx S'holders Litig.* ($30 million), and *Harman* ($28 million). *Websense* and *Onyx* are both believed to be the largest post-merger class settlements in California state court history. When Knotts presented the settlement as lead counsel for the stockholders in *Joy Global*, the United States District Court for the Eastern District of Wisconsin noted that "this is a pretty extraordinary settlement, recovery on behalf of the members of the class. . . . [I]t's always a pleasure to work with people who are experienced and who know what they are doing."

Education

B.S., University of Pittsburgh, 2001; J.D., Cornell Law School, 2004

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2027; Best Lawyer in America, *Best Lawyers*®, 2027; Top 100 Lawyer, *Daily Journal*, 2026; Recommended Lawyer, *The Legal 500*, 2017-2019, 2026; Titan of the Plaintiffs Bar, *Law360*, 2026; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2026; Leading Commercial Litigator, *Daily Journal*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Leading Lawyer in America, *Lawdragon*, 2026; Litigation Star, *Benchmark Litigation*, 2026; 40 & Under List, *Benchmark Litigation*, 2023; 40 & Under Hot List, *Benchmark Litigation*, 2018, 2020-2021; Next Generation Partner, *The Legal 500*, 2019-2021; Wiley W. Manuel Award for Pro Bono Legal Services, State Bar of California; Casa Cornelia Inns of Court; J.D., *Cum Laude*, Cornell Law School, 2004

Peter Ko | Partner

Peter Ko is a partner in the Firm's San Diego office focused on complex investigation, litigation, trial, and appeals.

Before joining the Firm, Ko served 27 years as a federal prosecutor in Nevada and the Southern District of California, handling cases involving fraud, corruption, racketeering, and other crimes. He tried dozens of cases and litigated scores of appeals in federal courts and was assigned to handle numerous high-profile prosecutions of national or international significance. Since 2010, Ko also served at points as First Assistant United States Attorney, Chief of Criminal, Chief of Appeals, Chief of National Security and Cybercrimes, and Senior Litigation Counsel. While at the U.S. Department of Justice (DOJ), Ko received the Attorney General's Claudia J. Flynn Award for Professional Responsibility as well as the Director's Award for Superior Performance. He has taught trial advocacy, evidence, discovery, and other litigation subjects for the DOJ and other agencies.

Education

B.A., University of California, San Diego, 1992; J.D., UCLA School of Law, 1997

Honors / Awards

Attorney General's Claudia J. Flynn Award for Professional Responsibility; Director's Award for Superior Performance, United States Attorney's Office

Kevin A. Lavelle | Partner

Kevin Lavelle is a partner in the Firm's San Diego office, where his practice focuses on complex securities litigation.

Lavelle has served on numerous litigation teams and helped obtain over $500 million for investors. His work includes several significant recoveries against corporations, including HCA Holdings, Inc. ($215 million); Altria Group and JUUL Labs ($90 million); Endo Pharmaceuticals ($63 million); and Intercept Pharmaceuticals ($55 million), among others.

Education

B.A., College of the Holy Cross, 2008; J.D., Brooklyn Law School, 2013

Honors / Awards

500 X – The Next Generation, *Lawdragon*, 2023-2025; J.D., *Cum Laude*, Brooklyn Law School, 2013; B.A., *Cum Laude*, College of the Holy Cross, 2008

Nathan R. Lindell | Partner

Nate Lindell is a partner in the Firm's San Diego office, where his practice focuses on representing aggrieved investors in complex civil litigation. He has helped achieve numerous significant recoveries for investors, including: *In re Enron Corp. Sec. Litig.* ($7.2 billion recovery); *In re HealthSouth Corp. Sec. Litig.* ($671 million recovery); *Luther v. Countrywide Fin. Corp.* ($500 million recovery); *Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.* ($388 million recovery); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* ($272 million recovery); *In re Morgan Stanley Mortg. Pass-Through Certificates Litig.* ($95 million recovery); *Massachusetts Bricklayers & Masons Tr. Funds v. Deutsche Alt-A Sec., Inc.* ($32.5 million recovery); *City of Ann Arbor Emps.' Ret. Sys. v. Citigroup Mortg. Loan Trust Inc.* ($24.9 million recovery); *Plumbers' Union Loc. No. 12 Pension Fund v. Nomura Asset Acceptance Corp.* ($21.2 million recovery); and *Genesee Cnty. Emps.' Ret. Sys. v. Thornburg Mortg., Inc.* ($11.25 million recovery). In October 2016, Lindell successfully argued in front of the New York Supreme Court, Appellate Division, First Judicial Department, for the reversal of an earlier order granting defendants' motion to dismiss in *Phoenix Light SF Limited v. Morgan Stanley*.

Lindell was also a member of the litigation team responsible for securing a landmark victory from the Second Circuit Court of Appeals in its precedent-setting *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* decision, which dramatically expanded the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of mortgage-backed securities investors, and ultimately resulted in a $272 million recovery for investors.

Education

B.S., Princeton University, 2003; J.D., University of San Diego School of Law, 2006

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2015-2017; Charles W. Caldwell Alumni Scholarship, University of San Diego School of Law; CALI/AmJur Award in Sports and the Law

Ting H. Liu | Partner

Ting Liu is a partner in the Firm's San Diego office, where she represents large institutional and individual investors. Her practice focuses on complex securities litigation. Liu was a member of the trial team that obtained a $350 million settlement on the eve of trial in *Smilovits v. First Solar, Inc.*, the fifth-largest PSLRA settlement recovered in the Ninth Circuit at the time. She was also a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial.

Education

B.A., University of Washington, 2012; J.D., University of San Diego School of Law, 2015

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers®*, 2026-2027; Top 40 Under 40, *Daily Journal*, 2026; 40 & Under List, *Benchmark Litigation*, 2024-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Rising Star, *Super Lawyers Magazine*, 2023-2025; Rising Star, *Law360*, 2024

Ryan Llorens | Partner

Ryan Llorens is a partner in the Firm's San Diego office. Llorens' practice focuses on litigating complex securities fraud cases. He has worked on a number of securities cases that have resulted in significant recoveries for investors, including: *In re HealthSouth Corp. Sec. Litig.* ($670 million); *AOL Time Warner* ($629 million); *In re AT&T Corp. Sec. Litig.* ($100 million); *In re Fleming Cos. Sec. Litig.* ($95 million); and *In re Cooper Cos., Inc. Sec Litig.* ($27 million).

Education

B.A., Pitzer College, 1997; J.D., University of San Diego School of Law, 2002

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2015

Andrew S. Love | Partner

Andrew Love is a partner in the Firm's San Francisco office and a member of the Firm's Appellate Practice Group. Love concentrates on federal appeals involving securities fraud class actions. Love has successfully briefed and argued cases on behalf of defrauded investors and consumers in several U.S. Courts of Appeals, as well as in the California appellate courts. Recent published cases include *Constr. Laborers Pension Tr. of Greater St. Louis v. Funko Inc.*, 189 F.4th 774 (9th Cir. 2026), *Sherman v. Abengoa, S.A.*, 156 F.4th 152 (2d Cir. 2025), *New England Carpenters Guaranteed Annuity & Pension Funds v. DeCarlo*, 122 F.4th 28 (2d Cir. 2023), *Stafford v. Rite Aid Corp.*, 998 F.3d 862 (9th Cir. 2021), *Constr. Indus. & Laborers Joint Pension Tr. v. Carbonite, Inc.*, 22 F.4th 1 (1st Cir. 2021), and *Friedman v. AARP, Inc.*, 855 F.3d 1047 (9th Cir. 2017). He was also co-counsel in *Cyan, Inc. v. Beaver Cnty. Emps. Ret. Fund*, 583 U.S. 416 (2018).

Before joining the Firm and for more than two decades, Love was a death penalty defense lawyer. He represented inmates on California's death row in habeas corpus proceedings and on direct appeal as a staff attorney at the California Appellate Project, in private practice, and then for a dozen years as a Supervising Deputy State Public Defender. Love obtained relief for capital clients in both the California Supreme Court and the Ninth Circuit. Love began his legal career as a staff attorney at the Legal Aid Foundation of Santa Barbara County.

Education

University of Vermont, 1981; J.D., University of San Francisco School of Law, 1985

Honors / Awards

J.D., *Cum Laude*, University of San Francisco School of Law, 1985; McAuliffe Honor Society, University of San Francisco School of Law, 1982-1985

Erik W. Luedeke | Partner

Erik Luedeke is a partner in the Firm's San Diego office, where he represents individual and institutional investors in breach of fiduciary duty and securities fraud litigation in state and federal courts nationwide. Luedeke is a member of the Firm's Delaware Practice Group. As corporate fiduciaries, directors and officers are duty-bound to act in the best interest of the corporation and its shareholders. When they fail to do so they breach their fiduciary duty and may be held liable for harm caused to the corporation. Luedeke's shareholder derivative practice focuses on litigating breach of fiduciary duty and related claims on behalf of corporations and shareholders injured by wayward corporate fiduciaries. Notable shareholder derivative actions in which he recently participated and the recoveries he helped to achieve include *In re Community Health Sys., Inc. S'holder Derivative Litig.* ($60 million in financial relief and unprecedented corporate governance reforms), *In re Lumber Liquidators Holdings, Inc. S'holder Derivative Litig.* ($26 million in financial relief plus substantial governance), and *In re Google Inc. S'holder Derivative Litig.* ($250 million in financial relief to fund substantial governance).

Luedeke's practice also includes the prosecution of complex securities class action cases on behalf of aggrieved investors. Luedeke was a member of the litigation team in *Jaffe v. Household Int'l, Inc.*, No. 02-C-5893 (N.D. Ill.), that resulted in a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial ending in a plaintiffs' verdict. He was also a member of the litigation teams in *In re UnitedHealth Grp. Inc. PSLRA Litig.*, No. 06-CV-1691 (D. Minn.) ($925 million recovery), and *In re Questcor Pharms., Inc. Sec. Litig.*, No. 8:12-cv-01623 (C.D. Cal.) ($38 million recovery).

Education

B.S./B.A., University of California Santa Barbara, 2001; J.D., University of San Diego School of Law, 2006

Honors / Awards

Rising Star, *Super Lawyers Magazine,* 2015-2017; Student Comment Editor, *San Diego International Law Journal*, University of San Diego School of Law

Christopher H. Lyons | Partner

Christopher Lyons is a partner in the Firm's Nashville and Wilmington offices, and manages the Wilmington office. He focuses his practice on representing institutional and individual investors in merger-related class action litigation and in complex securities litigation. Lyons has been a significant part of litigation teams that have achieved substantial recoveries for investors. Notable Delaware cases that Lyons has co-led include *Bioverativ* (*Goldstein v. Denner*) ($124 million recovery), *Good Technology* ($52 million – about 1.5 times the consideration paid to common stockholders in the challenged private-company merger), *Blackhawk Network Holdings* ($29.5 million), and *The Fresh Market* (*Morrison v. Berry*) ($27.5 million recovered). Lyons has also been part of teams litigating federal securities cases that led to substantial recoveries, including *Envision* ($177.5 million), *CoreCivic* (*Grae v. Corrections Corporation of America*) ($56 million recovered), and *Nissan* ($36 million). His *pro bono* work includes representing individuals who are appealing denial of necessary medical benefits by TennCare (Tennessee's Medicaid program), through the Tennessee Justice Center.

Both during and before his time at Robbins Geller, Lyons has litigated extensively in Delaware courts, having tried cases on behalf of both plaintiffs and defendants in the Delaware Court of Chancery. Before joining Robbins Geller, Lyons practiced at a prominent Delaware law firm, where he mostly represented corporate officers and directors defending against breach of fiduciary duty claims in the Delaware Court of Chancery and in the Delaware Supreme Court. Before that, he clerked for Vice Chancellor J. Travis Laster of the Delaware Court of Chancery. Lyons now applies the expertise he gained from those experiences to help investors uncover wrongful conduct and recover the money and other remedies to which they are rightfully entitled.

Education

B.A., Colorado College, 2006; J.D., Vanderbilt University Law School, 2010

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2027; Recommended Lawyer, *The Legal 500*, 2024-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; 40 & Under List, *Benchmark Litigation*, 2023-2025; Rising Star, *Super Lawyers Magazine*, 2018-2020, 2022-2024; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2022-2024; 500 X – The Next Generation, *Lawdragon*, 2023; 40 & Under Hot List, *Benchmark Litigation*, 2021; B.A., Distinction in International Political Economy, Colorado College, 2006; J.D., Law & Business Certificate, Vanderbilt University Law School, 2010

Mark T. Millkey | Partner

Mark Millkey is a partner in the Firm's Melville office. He has significant experience in the areas of securities and consumer litigation, as well as in federal and state court appeals.

During his career, Millkey has worked on a major consumer litigation against MetLife that resulted in a benefit to the class of approximately $1.7 billion, as well as a securities class action against Royal Dutch/Shell that settled for a minimum cash benefit to the class of $130 million and a contingent value of more than $180 million. Since joining Robbins Geller, he has worked on securities class actions that have resulted in more than $1.5 billion in settlements.

Education

B.A., Yale University, 1981; M.A., University of Virginia, 1983; J.D., University of Virginia, 1987

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2013-2026

David W. Mitchell | Partner

David Mitchell is a partner in the Firm's San Diego office and focuses his practice on antitrust and securities fraud litigation. He is a former federal prosecutor who has tried nearly 20 jury trials. As head of the Firm's Antitrust and Competition Law Practice Group, he has served as lead or co-lead counsel in numerous cases and has helped achieve substantial settlements for shareholders. His most notable antitrust cases include *Dahl v. Bain Cap. Partners, LLC*, obtaining more than $590 million for shareholders, and *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, in which a settlement of $5.5 billion was approved in the Eastern District of New York. This case was brought on behalf of millions of U.S. merchants against Visa and MasterCard and various card-issuing banks, challenging the way these companies set and collect tens of billions of dollars annually in merchant fees. The settlement is believed to be the largest antitrust class action settlement of all time.

Additionally, Mitchell served as co-lead counsel in the ISDAfix Benchmark action against 14 major banks and broker ICAP plc, obtaining $504.5 million for plaintiffs. Currently, Mitchell serves as court-appointed lead counsel in *In re Aluminum Warehousing Antitrust Litig.*, *City of Providence, Rhode Island v. BATS Global Markets Inc.*, *In re SSA Bonds Antitrust Litig.*, *In re Remicade Antitrust Litig.*, and *In re 1-800 Contacts Antitrust Litig*.

Education

B.A., University of Richmond, 1995; J.D., University of San Diego School of Law, 1998

Honors / Awards

Member, Enright Inn of Court; Best Lawyer in America, *Best Lawyers*®, 2018-2027; Super Lawyer, *Super Lawyers Magazine*, 2016-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2024; Leading Lawyer in America, *Lawdragon*, 2020-2024; Top 50 Lawyers in San Diego, *Super Lawyers Magazine*, 2021; Southern California Best Lawyer, *Best Lawyers*®, 2018-2021; Honoree, Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2018; Antitrust Trailblazer, *The National Law Journal*, 2015; "Best of the Bar," *San Diego Business Journal*, 2014

Danielle S. Myers | Partner

Danielle Myers is a partner in the Firm's San Diego office and focuses her practice on complex securities litigation. Myers oversees the Portfolio Monitoring Program® and provides legal recommendations to the Firm's institutional investor clients on their options to maximize recoveries in securities litigation, both within the United States and internationally, from inception to settlement.

Myers advises the Firm's clients in connection with lead plaintiff applications and has helped secure appointment of the Firm's clients as lead plaintiff and the Firm's appointment as lead counsel in hundreds of securities class actions, which cases have yielded more than $4 billion for investors, including 2018-2026 recoveries in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.*, No. 3:15-cv-07658 (D.N.J.) ($1.2 billion); *In re Am. Realty Cap. Props., Inc. Litig.*, No. 1:15-mc-00040 (S.D.N.Y.) ($1.025 billion); *In re Twitter Inc. Sec. Litig.*, No. 4:16-cv-05314 (N.D. Cal.) ($809.5 million); *In re Apple Inc. Sec. Litig.*, No. 4:19-cv-02033 (N.D. Cal.) ($490 million); *In re Under Armour Sec. Litig.*, No. 1:17-cv-00388 (D. Md.) ($434 million); *Smilovits v. First Solar, Inc.*, No. 2:12-cv-00555 (D. Ariz.) ($350 million); *Dicker v. TuSimple Holdings, Inc.*, No. 3:22-cv-01300 (S.D. Cal.) ($189 million); *St. Clair Cnty. Emps.' Ret. Sys. v. Acadia Healthcare Co., Inc.*, No. 3:18-cv-00988 (M.D. Tenn.) ($179 million); *Flynn v. Exelon Corp.*, No. 1:19-cv-08209 (N.D. Ill.) ($173 million); *City of Pontiac Gen. Ret. Sys. v. Wal-Mart Stores, Inc.*, No. 5:12-cv-5162 (W.D. Ark.) ($160 million); *In re Zoom Sec. Litig.*, No. 3:20-cv-02353 (N.D. Cal.) ($150 million); *Evellard v. LendingClub Corp.*, No. 3:16-cv-02627 (N.D. Cal.) ($125 million); *La. Sheriffs' Pension & Relief Fund v. Cardinal Health, Inc.*, No. 2:19-cv-03347 (S.D. Ohio) ($109 million); *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031 (E.D. Va.) ($108 million); *Lamartina v. VMware, Inc.*, No. 5:20-cv-02182 (N.D. Cal.) ($102.5 million); *In re Novo Nordisk Sec. Litig.*, No. 3:17-cv-00209 (D.N.J.) ($100 million); and *Karinski v. Stamps.com, Inc.*, No. 2:19-cv-01828 (C.D. Cal.) ($100 million). Myers is also a frequent presenter on securities fraud and corporate governance reform at conferences and events around the world.

Education

B.A., University of California at San Diego, 1997; J.D., University of San Diego, 2008

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2026-2027; Best Lawyer in America, *Best Lawyers*®, 2026-2027; Global Plaintiff Lawyer, *Lawdragon*, 2024-2026; Managing Partner You Need to Know, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2022-2026; Leading Lawyer in America, *Lawdragon*, 2022-2026; Future Star, *Benchmark Litigation*, 2019-2020, 2023-2026; Leading Lawyer, *The Legal 500*, 2020-2025; Best Lawyer in America: One to Watch, *Best Lawyers*®, 2021-2023; Top 100 Leaders in Law Honoree, *San Diego Business Journal*, 2022; Best Lawyer in Southern California: One to Watch, *Best Lawyers*®, 2021; Next Generation Lawyer, *The Legal 500*, 2017-2019; Recommended Lawyer, *The Legal 500*, 2019; Rising Star, *Super Lawyers Magazine*, 2015-2018; One of the "Five Associates to Watch in 2012," *Daily Journal*; Member, *San Diego Law Review*; CALI Excellence Award in Statutory Interpretation

Eric I. Niehaus | Partner

Eric Niehaus is a partner in the Firm's San Diego office, where his practice focuses on complex securities and derivative litigation. His efforts have resulted in numerous multi-million dollar recoveries to shareholders and extensive corporate governance changes. Notable examples include: *In re NYSE Specialists Sec. Litig.* (S.D.N.Y.); *In re Novatel Wireless Sec. Litig.* (S.D. Cal.); *Batwin v. Occam Networks, Inc.* (C.D. Cal.); *Commc'ns Workers of Am. Plan for Employees' Pensions and Death Benefits v. CSK Auto Corp.* (D. Ariz.); *Marie Raymond Revocable Trust v. Mat Five* (Del. Ch.); and *Kelleher v. ADVO, Inc.* (D. Conn.). He most recently prosecuted a case against Stamps.com in the Central District of California that resulted in a $100 million settlement for shareholders of the company's stock. Before joining the Firm, Niehaus worked as a Market Maker on the American Stock Exchange in New York and the Pacific Stock Exchange in San Francisco.

Education

B.S., University of Southern California, 1999; J.D., California Western School of Law, 2005

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2015-2016; J.D., *Cum Laude*, California Western School of Law, 2005; Member, *California Western Law Review*

Erika Oliver | Partner

Erika Oliver is a partner in the Firm's San Diego office, where her practice focuses on complex securities litigation. Erika was a member of the litigation teams of Robbins Geller attorneys that successfully recovered hundreds of millions of dollars for investors in securities class actions, including *Purple Mountain Trust v. Wells Fargo & Co.* (N.D. Cal.) ($300 million recovery), *Evanston Police Pension Fund v. McKesson Corp.* (N.D. Cal.) ($141 million recovery), *In re Novo Nordisk Sec. Litig.* (D.N.J.) ($100 million recovery), *Fleming v. Impax Labs. Inc.* (N.D. Cal.) ($33 million recovery), and *In re Banc of California Sec. Litig.* (C.D. Cal.) ($19.75 million recovery).

Education

B.S., San Diego State University, 2009; J.D., University of San Diego School of Law, 2015

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2024-2027; 40 & Under List, *Benchmark Litigation*, 2023-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2023-2026; Rising Star, *Super Lawyers Magazine*, 2024-2025; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2021-2024; Top 40 Under 40, *Daily Journal*, 2023; 500 X – The Next Generation, *Lawdragon*, 2023; Rising Star, *Law360*, 2023; Best Lawyer in Southern California: One to Watch, *Best Lawyers®*, 2021; J.D., *Magna Cum Laude*, University of San Diego School of Law, 2015; B.S., *Cum Laude*, San Diego State University, 2009

Lucas F. Olts | Partner

Luke Olts is a partner in the Firm's San Diego office, where his practice focuses on securities litigation on behalf of individual and institutional investors. Olts recently served as lead counsel in *In re Facebook Biometric Info. Privacy Litig.*, a cutting-edge class action concerning Facebook's alleged privacy violations through its collection of users' biometric identifiers without informed consent that resulted in a $650 million settlement. Olts has focused on litigation related to residential mortgage-backed securities, and has served as lead counsel or co-lead counsel in some of the largest recoveries arising from the collapse of the mortgage market. For example, he was a member of the team that recovered $388 million for investors in J.P. Morgan residential mortgage-backed securities in *Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.*, and a member of the litigation team responsible for securing a $272 million settlement on behalf of mortgage-backed securities investors in *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* Olts also served as co-lead counsel in *In re Wachovia Preferred Sec. & Bond/Notes Litig.*, which recovered $627 million under the Securities Act of 1933. He also served as lead counsel in *Siracusano v. Matrixx Initiatives, Inc.*, in which the U.S. Supreme Court unanimously affirmed the decision of the Ninth Circuit that plaintiffs stated a claim for securities fraud under §10(b) of the Securities Exchange Act of 1934 and SEC Rule 10b-5. Olts also served on the litigation team in *In re Deutsche Bank AG Sec. Litig.*, in which the Firm obtained *a* $18.5 million settlement in a case against Deutsche Bank and certain of its officers alleging violations of the Securities Act of 1933. Before joining the Firm, Olts served as a Deputy District Attorney for the County of Sacramento, where he tried numerous cases to verdict, including crimes of domestic violence, child abuse, and sexual assault.

Education

B.A., University of California, Santa Barbara, 2001; J.D., University of San Diego School of Law, 2004

Honors / Awards

Global Plaintiff Lawyer, *Lawdragon*, 2024, 2026; Future Star, *Benchmark Litigation*, 2018-2020, 2023-2026; Next Generation Lawyer, *The Legal 500*, 2017; Top Litigator Under 40, *Benchmark Litigation*, 2017; Under 40 Hotlist, *Benchmark Litigation*, 2016

Steven W. Pepich | Partner

Steve Pepich is a partner in the Firm's San Diego office. His practice has focused primarily on securities class action litigation, but has also included a wide variety of complex civil cases, including representing plaintiffs in mass tort, royalty, civil rights, human rights, ERISA, and employment law actions. Pepich has participated in the successful prosecution of numerous securities class actions, including: *Carpenters Health & Welfare Fund v. Coca-Cola Co.* ($137.5 million recovery); *In re Fleming Cos. Inc. Sec. & Derivative Litig.* ($95 million recovered); *In re Boeing Sec. Litig.*($92 million recovery); *In re Louisiana-Pacific Corp. Sec. Litig.* ($65 million recovery); *Haw. Structural Ironworkers Pension Trust Fund v. Calpine Corp.* ($43 million recovery); *In re Advanced Micro Devices Sec. Litig.* ($34 million recovery); and *Gohler v. Wood*, ($17.2 million recovery). Pepich was a member of the plaintiffs' trial team in *Mynaf v. Taco Bell Corp.*, which settled after two months of trial on terms favorable to two plaintiff classes of restaurant workers for recovery of unpaid wages. He was also a member of the plaintiffs' trial team in *Newman v. Stringfellow* where, after a nine-month trial in Riverside, California, all claims for exposure to toxic chemicals were ultimately resolved for $109 million.

Education

B.S., Utah State University, 1980; J.D., DePaul University, 1983

Daniel J. Pfefferbaum | Partner

Daniel Pfefferbaum is a partner in the Firm's San Francisco office, where his practice focuses on complex securities litigation. He has been a member of litigation teams that have recovered more than $750 million for investors, including: *In re Apple Inc. Sec. Litig.* ($490 million recovery); *City of Westland Police & Fire Ret. Sys. v. Metlife Inc.* ($84 million recovery); *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.* ($65 million recovery); *In re Prudential Fin., Inc. Sec. Litig.* ($35 million recovery); *In re PMI Grp., Inc. Sec. Litig.* ($31.25 million recovery); *Hessefort v. Super Micro Computer, Inc.* ($18.25 million recovery); and *Xiang v. Inovalon Holdings, Inc.* ($17 million recovery). Pfefferbaum was a member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members are eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis.

Education

B.A., Pomona College, 2002; J.D., University of San Francisco School of Law, 2006; LL.M. in Taxation, New York University School of Law, 2007

Honors / Awards

500 X - The Next Generation, *Lawdragon*, 2026; Future Star, *Benchmark Litigation*, 2018-2020, 2023-2026; 40 & Under Hot List, *Benchmark Litigation*, 2016-2020; Top 40 Under 40, *Daily Journal*, 2017; Rising Star, *Super Lawyers Magazine*, 2013-2017

Theodore J. Pintar | Partner

Ted Pintar is a partner in the Firm's San Diego office. Pintar has over 20 years of experience prosecuting securities fraud actions and derivative actions and over 15 years of experience prosecuting insurance-related consumer class actions, with recoveries in excess of $1 billion. He was part of the litigation team in the AOL Time Warner state and federal court securities opt-out actions, which arose from the 2001 merger of America Online and Time Warner. These cases resulted in a global settlement of $618 million. Pintar was also on the trial team in *Knapp v. Gomez*, which resulted in a plaintiff's verdict. Pintar has successfully prosecuted several RICO cases involving the deceptive sale of deferred annuities, including cases against Allianz Life Insurance Company of North America ($250 million), American Equity Investment Life Insurance Company ($129 million), Midland National Life Insurance Company ($80 million), and Fidelity & Guarantee Life Insurance Company ($53 million). He has participated in the successful prosecution of numerous other insurance and consumer class actions, including: (i) actions against major life insurance companies such as Manufacturer's Life ($555 million initial estimated settlement value) and Principal Mutual Life Insurance Company ($380+ million), involving the deceptive sale of life insurance; (ii) actions against major homeowners insurance companies such as Allstate ($50 million) and Prudential Property and Casualty Co. ($7 million); (iii) actions against automobile insurance companies such as the Auto Club and GEICO; and (iv) actions against Columbia House ($55 million) and BMG Direct, direct marketers of CDs and cassettes. Pintar and co-counsel recently settled a securities class action for $32.8 million against Snap, Inc. in *Snap Inc. Securities Cases*, a case alleging violations of the Securities Act of 1933. Additionally, Pintar has served as a panelist for numerous Continuing Legal Education seminars on federal and state court practice and procedure.

Education

B.A., University of California, Berkeley, 1984; J.D., University of Utah College of Law, 1987

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2022; Super Lawyer, *Super Lawyers Magazine*, 2014-2017; CAOC Consumer Attorney of the Year Award Finalist, 2015; Note and Comment Editor, *Journal of Contemporary Law*, University of Utah College of Law; Note and Comment Editor, *Journal of Energy Law and Policy*, University of Utah College of Law

Ashley M. Price | Partner

Ashley Price is a partner in the Firm's San Diego office. Her practice focuses on complex securities litigation. Price is currently serving as lead counsel in *Bucks Cnty. Emps. Ret. Sys. v. Norfolk Southern Corp.* (N.D. Ga.), a case brought on behalf of Norfolk Southern's investors following the catastrophic derailment of one of Norfolk Southern's freight trains outside of East Palestine, Ohio. Having prevailed against defendants' attempt to dismiss the case, the team is now pressing forward to obtain evidence for proving at a jury trial investors' claims that defendants fraudulently misrepresented the safety of their railroad operations.

Price also served as lead counsel in *In re Am. Realty Cap. Props., Inc. Litig.* (S.D.N.Y.), a case arising out of ARCP's manipulative accounting practices, and obtained a $1.025 billion recovery. For five years, she and the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and the Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages of any major PSLRA case prior to trial and includes the largest personal contributions by individual defendants in history.

Price was likewise a key member of many other successful Robbins Geller litigation teams, including *Monroe Cnty. Emps.' Ret. Sys. v. Southern Co.* (N.D. Ga.) ($87.5 million recovery), *Strathclyde Pension Fund v. Bank OZK* (E.D. Ark.) ($45 million recovery), *Micholle v. Ophthotech Corp.* (S.D.N.Y.) ($29 million recovery), and *Mart v. Tactile Sys. Tech., Inc.* (D. Minn.) ($5 million recovery).

Education

B.A., Duke University, 2006; J.D., Washington University in St. Louis, School of Law, 2011

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2023-2026; 40 & Under List, *Benchmark Litigation*, 2023-2025; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2023-2025; 500 X – The Next Generation, *Lawdragon*, 2023-2024; 40 & Under Hot List, *Benchmark Litigation*, 2021; Rising Star, *Super Lawyers Magazine*, 2016-2021

Willow E. Radcliffe | Partner

Willow Radcliffe is a partner in the Firm's San Francisco office, where she concentrates her practice in securities class action litigation in federal court. She has been significantly involved in the prosecution of numerous securities fraud claims, including actions filed against Pfizer, Inc. ($400 million recovery), CoreCivic (*Grae v. Corrections Corporation of America*) ($56 million recovery), Flowserve Corp. ($55 million recovery), Santander Consumer USA Holdings Inc. ($47 million), NorthWestern Corp. ($40 million recovery), Ashworth, Inc. ($15.25 million recovery), and Allscripts Healthcare Solutions, Inc. ($9.75 million recovery). Additionally, Radcliffe has represented plaintiffs in other complex actions, including a class action against a major bank regarding the adequacy of disclosures made to consumers in California related to access checks. Before joining the Firm, she clerked for the Honorable Maria-Elena James, Magistrate Judge for the United States District Court for the Northern District of California.

Education

B.A., University of California, Los Angeles 1994; J.D., Seton Hall University School of Law, 1998

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Best Lawyer in America: One to Watch, *Best Lawyers*®, 2021-2025; Best Lawyer in Northern California: One to Watch, *Best Lawyers*®, 2021; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2020; J.D., *Cum Laude*, Seton Hall University School of Law, 1998; Most Outstanding Clinician Award; Constitutional Law Scholar Award

Frank A. Richter | Partner

Frank Richter is a partner in the Firm's Chicago office, where he focuses on shareholder, antitrust, and class action litigation.

Richter was an integral member of the Robbins Geller team that secured a $1.21 billion settlement in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.* (D.N.J.), which is the ninth-largest securities class action settlement in history and the largest ever against a pharmaceutical manufacturer. More recently, Richter's representative matters include *Exelon* (N.D. Ill., $173 million settlement), which resolved securities claims stemming from the alleged concealment of an eight-year scheme to bribe a public official, as well as *Nutanix* (N.D. Cal., $71 million settlement), *Oak Street Health* (N.D. Ill., $60 million settlement), and *Grubhub* (N.D. Ill., $42 million settlement). In addition, Richter was a member of litigation teams that secured significant settlements in *HCA* (E.D. Tenn., $215 million), *Sprint* (D. Kan., $131 million), *Orbital ATK* (E.D. Va., $108 million), *Dana Corp.* (N.D. Ohio, $64 million), *Diplomat* (N.D. Ill., $15.5 million), *LJM Funds* (N.D. Ill., $12.85 million), and *Camping World* (N.D. Ill., $12.5 million).

Richter also works on antitrust matters, including serving on the Plaintiffs' Steering Committee in *In re Dealer Mgmt. Sys. Antitrust Litig.* (N.D. Ill.), and he represents plaintiffs as local counsel in class action and derivative shareholder litigation in Illinois state and federal courts.

Education

B.A., Truman State University, 2007; M.M., DePaul University School of Music, 2009; J.D., DePaul University College of Law, 2012

Honors / Awards

500 X – The Next Generation, *Lawdragon*, 2023-2026; 40 & Under List, *Benchmark Litigation*, 2023-2025; Rising Star, *Super Lawyers Magazine*, 2017-2022; 40 & Under Hot List, *Benchmark Litigation*, 2021; J.D., *Summa Cum Laude*, Order of the Coif, CALI Award for highest grade in seven courses, DePaul University College of Law, 2012

Darren J. Robbins | Partner

Darren Robbins is a founding partner of Robbins Geller Rudman & Dowd LLP. Over the last two decades, Robbins has served as lead counsel in more than 100 securities class actions and has recovered billions of dollars for investors. Robbins served as lead counsel in *In re Am. Realty Cap. Props., Inc. Litig.*, a securities class action arising out of improper accounting practices, recovering more than $1 billion for class members. The *American Realty* settlement represents the largest recovery as a percentage of damages of any major class action brought pursuant to the Private Securities Litigation Reform Act of 1995 and resolved prior to trial. The $1+ billion settlement included the largest personal contributions ($237.5 million) ever made by individual defendants to a securities class action settlement.

Robbins also led Robbins Geller's prosecution of wrongdoing related to the sale of residential mortgage-backed securities (RMBS) prior to the global financial crisis, including an RMBS securities class action against Goldman Sachs that yielded a $272 million recovery for investors. Robbins served as co-lead counsel in connection with a $627 million recovery for investors in *In re Wachovia Preferred Securities & Bond/Notes Litig.*, one of the largest securities class action settlements ever involving claims brought solely under the Securities Act of 1933.

One of the hallmarks of Robbins' practice has been his focus on corporate governance reform. In *UnitedHealth*, a securities fraud class action arising out of an options backdating scandal, Robbins represented lead plaintiff CalPERS and obtained the cancellation of more than 3.6 million stock options held by the company's former CEO and secured a record $925 million cash recovery for shareholders. He also negotiated sweeping corporate governance reforms, including the election of a shareholder-nominated director to the company's board of directors, a mandatory holding period for shares acquired via option exercise, and compensation reforms that tied executive pay to performance. Recently, Robbins led a shareholder derivative action brought by several pension funds on behalf of Community Health Systems, Inc. that yielded a $60 million payment to Community Health as well as corporate governance reforms that included two shareholder-nominated directors, the creation and appointment of a Healthcare Law Compliance Coordinator, the implementation of an executive compensation clawback in the event of a restatement, the establishment of an insider trading controls committee, and the adoption of a political expenditure disclosure policy.

Education

B.S., University of Southern California, 1990; M.A., University of Southern California, 1990; J.D., Vanderbilt Law School, 1993

Honors / Awards

Lawyer of the Year: Litigation – Securities, *Best Lawyers*®, 2023, 2025, 2027; Best Lawyer in America, *Best Lawyers*®, 2010-2027; Hall of Fame, *The Legal 500*, 2023-2026; Ranked by *Chambers USA*, 2014-2026; Top 10 Lawyers in San Diego, *Super Lawyers Magazine*, 2024, 2026; Litigation Star, *Benchmark Litigation*, 2023-2026; California - Litigation Star, *Benchmark Litigation*, 2024-2025; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2022, 2024; Leading Lawyer, *The Legal 500*, 2020-2022; Top 50 Lawyers in San Diego, *Super Lawyers Magazine*, 2015, 2021; Litigator of the Week, *The American Lawyer*, 2021; Southern California Best Lawyer, *Best Lawyers*®, 2012-2021; Local Litigation Star, *Benchmark Litigation*, 2013-2018, 2020; Recommended Lawyer, *The Legal 500*, 2011, 2017, 2019; Benchmark California Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Lawyer of the Year, *Best Lawyers*®, 2017; Influential Business Leader, *San Diego Business Journal*, 2017; Litigator of the Year, *Our City San Diego*, 2017; One of the Top 100 Lawyers Shaping the Future, *Daily Journal*; One of the "Young

Litigators 45 and Under," *The American Lawyer*; Attorney of the Year, *California Lawyer*; Managing Editor, *Vanderbilt Journal of Transnational Law*, Vanderbilt Law School

Robert J. Robbins | Partner

Robert Robbins is a partner in the Firm's Boca Raton office. He focuses his practice on investigating securities fraud, initiating securities class actions, and helping institutional and individual shareholders litigate their claims to recover investment losses caused by fraud. Representing shareholders in all aspects of class actions brought pursuant to the federal securities laws, Robbins provides counsel in numerous securities fraud class actions across the country, helping secure significant recoveries for investors.

Recently, Robbins was a key member of the Robbins Geller litigation team that secured a $1.21 billion settlement in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.*, a case that *Vanity Fair* reported as "the corporate scandal of its era" that had raised "fundamental questions about the functioning of our health-care system, the nature of modern markets, and the slippery slope of ethical rationalizations." This is the ninth largest securities class action settlement ever and the largest against a pharmaceutical manufacturer. Robbins has also been a member of Robbins Geller litigation teams responsible for securing hundreds of millions of dollars in securities class action settlements, including: *Hospira* ($60 million recovery); *3D Systems* ($50 million); *CVS Caremark* ($48 million recovery); *Baxter International* ($42.5 million recovery); *Grubhub* ($42 million); *R.H. Donnelley* ($25 million recovery); *Spiegel* ($17.5 million recovery); *TECO Energy* ($17.35 million recovery); *AFC Enterprises* ($17.2 million recovery); *Accretive Health* ($14 million recovery); *Lender Processing Services* ($14 million recovery); *Lexmark Int'l* ($12 million); *Imperial Holdings* ($12 million recovery); *Mannatech* ($11.5 million recovery); *Newpark Resources* ($9.24 million recovery); *CURO Group* ($8.98 million); *Gilead Sciences* ($8.25 million recovery); *TCP International* ($7.175 million recovery); *Cryo Cell International* ($7 million recovery); *Gainsco* ($4 million recovery); and *Body Central* ($3.425 million recovery).

Education

B.S., University of Florida, 1999; J.D., University of Florida College of Law, 2002

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Litigator in America, *Lawdragon*, 2024-2026; Best Lawyer in America: One to Watch, *Best Lawyers*®, 2024; Rising Star, *Super Lawyers Magazine*, 2015-2017; J.D., High Honors, University of Florida College of Law, 2002; Member, *Journal of Law and Public Policy*, University of Florida College of Law; Member, *Phi Delta Phi*, University of Florida College of Law; *Pro bono* certificate, Circuit Court of the Eighth Judicial Circuit of Florida; Order of the Coif

David A. Rosenfeld | Partner

David Rosenfeld, a partner in the Firm's Melville office, has focused his legal practice for more than 20 years in the area of securities litigation. He has argued in courts throughout the country, has been appointed lead counsel in dozens of securities fraud lawsuits, and has successfully recovered hundreds of millions of dollars for defrauded shareholders.

Rosenfeld works on all stages of litigation, including drafting pleadings, arguing motions, and negotiating settlements. Most recently, he led the teams of Robbins Geller attorneys in recovering $95 million for shareholders of Tableau Software, Inc., $90 million for shareholders of Altria Group, Inc., $40 million for shareholders of BRF S.A, $20 million for shareholders of Grana y Montero (where shareholders recovered more than 90% of their losses), and $34.5 million for shareholders of L-3 Communications Holdings, Inc.

Rosenfeld also led the Robbins Geller team in recovering in excess of $34 million for investors in Overseas Shipholding Group, which represented an outsized recovery of 93% of bond purchasers' damages and 28% of stock purchasers' damages. The creatively structured settlement included more than $15 million paid by a bankrupt entity. Rosenfeld also led the effort that resulted in the recovery of nearly 90% of losses for investors in Austin Capital, a sub-feeder fund of Bernard Madoff. In connection with this lawsuit, Rosenfeld met with and interviewed Madoff in federal prison in Butner, North Carolina.

Rosenfeld has also achieved remarkable recoveries against companies in the financial industry. In addition to being appointed lead counsel in the securities fraud lawsuit against First BanCorp ($74.25 million recovery), he recovered $70 million for investors in Credit Suisse Group and $14 million for Barclays investors.

Education

B.S., Yeshiva University, 1996; J.D., Benjamin N. Cardozo School of Law, 1999

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2014-2026; Future Star, *Benchmark Litigation*, 2016-2020, 2023-2026; Recommended Lawyer, *The Legal 500*, 2018; Rising Star, *Super Lawyers Magazine*, 2011-2013

Robert M. Rothman | Partner

Robert Rothman is a partner in the Firm's New York office and a member of the Firm's Management Committee. He has recovered well in excess of $1 billion on behalf of victims of investment fraud, consumer fraud, and antitrust violations.

Recently, Rothman served as lead counsel in *In re Am. Realty Cap. Props., Inc. Litig.* where he obtained a $1.025 billion cash recovery on behalf of investors. Rothman and the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and the Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages ever obtained in a major PSLRA case before trial and includes the largest personal contributions by individual defendants in history. Additionally, Rothman has recovered hundreds of millions of dollars for investors in cases against First Bancorp, Doral Financial, Popular, iStar, Autoliv, CVS Caremark, Fresh Pet, The Great Atlantic & Pacific Tea Company (A&P), NBTY, Spiegel, American Superconductor, Iconix Brand Group, Black Box, OSI Pharmaceuticals, Gravity, Caminus, Central European Distribution Corp., OneMain Holdings, The Children's Place, CNinsure, Covisint, FleetBoston Financial, Interstate Bakeries, Hibernia Foods, Jakks Pacific, Jarden, Portal Software, Ply Gem Holdings, Orion Energy, Tommy Hilfiger, TD Banknorth, Teletech, Unitek, Vicuron, Xerium, W Holding, and dozens of others.

Rothman also has achieved significant monetary recoveries for shareholders in connection with going-private transactions and tender offers. In addition, he also actively litigates consumer fraud cases, including a case alleging false advertising where the defendant agreed to a settlement valued in excess of $67 million.

Education

B.A., State University of New York at Binghamton, 1990; J.D., Hofstra University School of Law, 1993

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2027; Super Lawyer, *Super Lawyers Magazine*, 2011, 2013-2026; Recommended Lawyer, *The Legal 500*, 2026; Global Plaintiff Lawyer, *Lawdragon*, 2024-2026; Managing Partner You Need to Know, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2022-2026; Leading Lawyer in America, *Lawdragon*, 2025-2026; Northeast Trailblazer, *The American Lawyer*, 2022; New York Trailblazer, *New York Law Journal*, 2020; Dean's Academic Scholarship Award, Hofstra University School of Law; J.D., with Distinction, Hofstra University School of Law, 1993; Member, *Hofstra Law Review*, Hofstra University School of Law

Samuel H. Rudman | Partner

Sam Rudman is a founding member of the Firm, a member of the Firm's Management Committee, and manages the Firm's New York offices. His 26-year securities practice focuses on recognizing and investigating securities fraud, and initiating securities and shareholder class actions to vindicate shareholder rights and recover shareholder losses. Rudman is also part of the Firm's SPAC Task Force, which is dedicated to rooting out and prosecuting fraud on behalf of injured investors in special purpose acquisition companies. A former attorney with the SEC, Rudman has recovered hundreds of millions of dollars for shareholders, including a $200 million recovery in *Motorola*, a $129 million recovery in *Doral Financial*, an $85 million recovery in *Blackstone*, a $74 million recovery in *First BanCorp*, a $65 million recovery in *Forest Labs,* a $62.5 million recovery in *SQM*, a $50 million recovery in *TD Banknorth*, a $48 million recovery in *CVS Caremark*, a $34.5 million recovery in *L-3 Communications Holdings*, a $32.8 million recovery in *Snap, Inc*., and a $18.5 million recovery in *Deutsche Bank*.

Education

B.A., Binghamton University, 1989; J.D., Brooklyn Law School, 1992

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2026-2027; Super Lawyer, *Super Lawyers Magazine*, 2007-2026; Recommended Lawyer, *The Legal 500*, 2018-2019, 2023-2026; Ranked by *Chambers USA*, 2014-2026; Global Plaintiff Lawyer, *Lawdragon*, 2025-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Lawyer in America, *Lawdragon*, 2016-2022, 2025-2026; Litigation Star, *Benchmark Litigation*, 2013, 2017-2019, 2023-2026; National Practice Area Star, *Benchmark Litigation*, 2019-2020, 2024-2026; Top 10 Most Influential Securities Litigation Attorney in New York, *Business Today*, 2023; New York Trailblazer, *New York Law Journal*, 2020; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2020; Local Litigation Star, *Benchmark Litigation*, 2013-2020; Dean's Merit Scholar, Brooklyn Law School; Moot Court Honor Society, Brooklyn Law School; Member, *Brooklyn Journal of International Law*, Brooklyn Law School

Joseph Russello | Partner

Joseph Russello is a partner in the Firm's Melville office. He began his career as a defense lawyer and now represents investors in securities class actions at the trial and appellate levels.

Rusello spearheaded the team that recovered $85 million in litigation against The Blackstone Group, LLC, a case that yielded a landmark decision from the Second Circuit Court of Appeals on "materiality" in securities actions. *Litwin v. Blackstone Grp., L.P.*, 634 F.3d 706 (2d Cir. 2011). He also led the team responsible for partially defeating dismissal and achieving a $50 million settlement in litigation against BHP Billiton, an Australia-based mining company accused of concealing safety issues at a Brazilian iron-ore dam. *In re BHP Billiton Ltd. Sec. Litig.*, 276 F. Supp. 3d 65 (S.D.N.Y. 2017).

Recently, Rusello was co-counsel in a lawsuit against Allied Nevada Gold Corporation, recovering $14.5 million for investors after the Ninth Circuit Court of Appeals reversed two dismissal decisions. *In re Allied Nev. Gold Corp. Sec. Litig.*, 743 F. App'x 887 (9th Cir. 2018). He was also instrumental in obtaining a settlement and favorable appellate decision in litigation against SAIC, Inc., a defense contractor embroiled in a decade-long overbilling fraud against the City of New York. *Ind. Pub. Ret. Sys. v. SAIC, Inc.*, 818 F.3d 85 (2d Cir. 2016). Other notable recent decisions include: *In re Qudian Sec. Litig.*,189 A.D. 3d 449 (N.Y. App. Div., 1st Dep't 2020); *Kazi v. XP Inc.*, 2020 WL 4581569 (N.Y. Sup. Ct. Aug. 5, 2020); *In re Dentsply Sirona, Inc. S'holders Litig.*, 2019 WL 3526142 (N.Y. Sup. Ct. Aug. 2, 2019); and *Matter of PPDAI Grp. Sec. Litig.*, 64 Misc. 3d 1208(A), 2019 WL 2751278 (N.Y. Sup. Ct. 2019). Other notable settlements include: *NBTY, Inc.* ($16 million); *LaBranche & Co., Inc.* ($13 million); *The Children's Place Retail Stores, Inc.* ($12 million); and *Prestige Brands Holdings, Inc.* ($11 million).

Education

B.A., Gettysburg College, 1998; J.D., Hofstra University School of Law, 2001

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2014-2021, 2023-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; *Law360* Securities Editorial Advisory Board, 2017-2022

Scott H. Saham | Partner

Scott Saham is a partner in the Firm's San Diego office, where his practice focuses on complex securities litigation. He is licensed to practice law in both California and Michigan. Most recently, Saham was a member of the litigation team that obtained a $125 million settlement in *In re LendingClub Sec. Litig.*, a settlement that ranked among the top ten largest securities recoveries ever in the Northern District of California. He was also part of the litigation teams in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee, and *Luna v. Marvell Tech. Grp., Ltd.*, which resulted in a $72.5 million settlement that represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors. He also served as lead counsel prosecuting the *Pharmacia* securities litigation in the District of New Jersey, which resulted in a $164 million recovery. Additionally, Saham was lead counsel in the *In re Coca-Cola Sec. Litig.* in the Northern District of Georgia, which resulted in a $137.5 million recovery after nearly eight years of litigation. He also obtained reversal from the California Court of Appeal of the trial court's initial dismissal of the landmark *Countrywide* mortgage-backed securities action. This decision is reported as *Luther v. Countrywide Fin. Corp.*, 195 Cal. App. 4th 789 (2011), and following this ruling that revived the action the case settled for $500 million.

Education

B.A., University of Michigan, 1992; J.D., University of Michigan Law School, 1995

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Distinguished Pro Bono Attorney of the Year, *Casa Cornelia Law Center*, 2022

Vincent M. Serra | Partner

Vincent Serra is a partner in the Firm's Melville office. His practice focuses primarily on complex securities and consumer actions, but has also included antitrust, employment, insurance, and environmental litigation. His efforts have contributed to the recovery of billions of dollars on behalf of aggrieved plaintiffs and class members and significant injunctive relief for individuals and municipalities throughout the country. Notably, Serra has contributed to several noteworthy recoveries, including *Dahl v. Bain Cap. Partners, LLC* ($590.5 million recovery), an antitrust action against the world's largest private equity firms alleging collusive practices in multi-billion dollar leveraged buyouts, and *Samit v. CBS Corp.* ($14.75 million recovery), a securities action alleging that defendants made false and misleading statements about their knowledge of former CEO Leslie Moonves's exposure to the #MeToo movement.

Additionally, Serra was a member of the litigation team that obtained a $22.75 million settlement fund on behalf of route drivers in *Veliz v. Cintas Corp.*, an action asserting violations of federal and state overtime laws. He was also part of the successful trial team in *Lebrilla v. Farmers Grp., Inc.*, which involved Farmers' practice of using inferior imitation parts when repairing insureds' vehicles. Other notable cases include *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.* ($5.5 billion recovery), *In re DouYu Int'l Holdings Ltd. Sec. Litig.* ($15 million state court securities recovery) and *Kail v. Wolf Appliance, Inc.* (confidential settlement in breach of warranty actions involving faulty blue porcelain oven cavities).

Serra has litigated several actions against manufacturers and retailers alleging the improper marketing and sale of purportedly "flushable" wipes products, including consumer fraud, nuisance, and strict product liability claims. For example, in *Commissioners of Public Works of the City of Charleston (d.b.a. Charleston Water System) v. Costco Wholesale Corp.*, Serra led the prosecution of seven defendants resulting in industrywide settlements that secured commitments from the leading flushable wipes manufacturers and retailers to meet the national municipal wastewater standard for flushability and enhance "do not flush" labeling for non-flushable wipes, helping to meaningfully reduce wipes-related sewer impacts for municipalities and wastewater utilities nationwide. Serra also recently helped secure additional nationwide relief on behalf of the Charleston Water System in an analogous settlement with Dude Products Inc.

Education

B.A., University of Delaware, 2001; J.D., California Western School of Law, 2005

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2024-2025; Wiley W. Manuel Award for Pro Bono Legal Services, State Bar of California

Taeva C. Shefler | Partner

Taeva Shefler is a partner in the Firm's San Francisco office and focuses her practice on consumer and securities fraud litigation. Along with other Robbins Geller attorneys, Shefler worked on behalf of cities and counties around the country in *In re National Prescription Opiate Litigation*. In 2022, Shefler participated on the trial team in a federal bench trial in San Francisco in a case that had been selected as a bellwether in the multi-district litigation. The trial has resulted in combined settlements of over $350 million for San Francisco, including a nearly $230 million settlement with Walgreens, and more than $50 billion nationally from multiple pharmaceutical companies who were defendants in the national litigation.

Shefler also worked to address the opioid crisis on behalf of cities and counties across the country in another multi-district litigation, *In re McKinsey Prescription Opiate Consultant Litigation*, seeking to hold McKinsey & Co., Inc., one of the world's leading business consultants, accountable for playing a "central role in the unfolding, propagation, and exploitation of the opioid crisis by advising multiple opioid manufacturers and other industry participants how to sell as many opioids as conceivably possible," according to the complaint. On February 2, 2024, the court granted final approval over a $230 million settlement between McKinsey, government subdivisions, and school districts to resolve claims about its role in facilitating the U.S. opioid crisis.

Shefler was also part of the team on the national *Juul* litigation, *In re Juul Labs, Inc., Marketing, Sales Practices, and Product Liability Litigation*. On September 19, 2023, the plaintiffs, for which Robbins Geller serves on the steering committee, secured final approval of a $255 million class action settlement with JUUL Labs, Inc. in the e-cigarette youth vaping predatory advertising, fraud, addiction, and injury multi-district litigation. The settlement with JUUL is part of a series of settlements on behalf of class, personal injury, and subdivision plaintiffs with cases in the multi-district litigation. Separately, a $235 million settlement with Altria received final approval in March 2024. The settlement was reached shortly after the plaintiffs' case was presented in a bellwether trial in San Francisco.

Before joining Robbins Geller, Shefler spent years representing whistleblowers in cases alleging fraud against federal and state governments in the areas of environmental cleanup, government contracting, and healthcare. She has also represented public and private water suppliers in mass tort cases alleging contamination of drinking water due to the use of toxic chemicals in agricultural areas across California.

Education

B.A., University of Oregon Clark Honors College, 2007; J.D., New York University School of Law, 2013

Honors / Awards

Rising Star of the Plaintiffs Bar, Elite Trial Lawyers, *The National Law Journal*, 2026; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2026; Leading Plaintiff Consumer Lawyer, *Lawdragon*, 2026; 500 X - The Next Generation, *Lawdragon*, 2023-2025; Best Lawyer in America: One to Watch, *Best Lawyers*®, 2024-2025; Rising Star, *Super Lawyers Magazine*, 2022-2023; J.D., *Cum Laude*, New York University School of Law, 2013; B.A., *Magna Cum Laude*, University of Oregon Clark Honors College, 2007

Sam S. Sheldon | Partner

Sam Sheldon is a partner in the Firm's San Diego office, where he focuses on securities fraud and other complex civil litigation. Before joining the Firm in January 2024, Sheldon served more than five years as a United States Magistrate Judge in the Southern District of Texas, primarily in Houston. He wrote opinions in almost every area of the law, including securities fraud, intellectual property, class actions, labor and employment, False Claims Act, and criminal law.

Most recently, Sam was a part of a team of Robbins Geller attorneys that successfully obtained a $179 million settlement in *In re Acadia Healthcare Sec. Litig*. A jury trial was scheduled to begin in Nashville, Tennessee when the case settled. It is the second largest securities class action recovery in the United States District Court for the Middle District of Tennessee.

Sam was also part of a team of Robbins Geller attorneys that successfully obtained a $434 million settlement in *In re Under Armor Sec. Litig*. The case settled just weeks before a jury trial was set to begin in Baltimore, Maryland. The $434 million recovery is the second largest securities fraud settlement ever in the Fourth Circuit and is among the top 50 largest such recoveries in U.S. history.

Before taking the federal bench, Sheldon was a partner with Quinn Emanuel in the Washington, D.C. office and headed the firm's Health Care Practice Group. He represented plaintiffs in landmark cases brought under the federal False Claims Act.

Sheldon previously served as Chief of the Health Care Fraud Unit in the DOJ Criminal Division in Washington, D.C., where he oversaw the prosecution of federal health care fraud throughout the United States. He also was an Assistant United States Attorney in Texas. Earlier in his career, Sheldon was a partner with Cozen O'Connor in the San Diego office. Sheldon has tried 26 cases as a federal prosecutor and civil litigator. He received numerous awards for his successful federal prosecutions from the DOJ and other federal agencies including the Special Achievement Award presented by the United States Attorney General.

Education

B.A., University of Southern California, 1992; M.A., University of Southern California, 1994; J.D., University of Houston Law Center, 1997

Honors / Awards

Leading Litigator in America, *Lawdragon*, 2026-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Super Lawyer, *Super Lawyers Magazine*, 2026; Leading Lawyer in America, *Lawdragon*, 2026; Prosecutor Leadership Award presented by the Inspector General for the United States Department of Health and Human Services, 2013; Special Award from the Director of the FBI for excellent work with the Medicare Fraud Taskforce, 2013; Exceptional Service Award presented by the United States Assistant Attorney General, 2011; Special Achievement Award presented by the United States Attorney General for Sustained Superior Performance of Duty, 2010; International Achievement Award from the Assistant Director of the Department of Homeland Security for prosecuting the first illegal exportation of goods case in the Southern District of Texas (under 18 U.S.C. §554), 2010; Special Award from the Director of the FBI for prosecuting the first agricultural fraud case in the United States (under 7 U.S.C. §7711), 2009

Arthur L. Shingler III | Partner

Arthur Shingler is a partner in the Firm's San Diego office. Shingler has successfully represented both public and private sector clients in hundreds of complex, multi-party actions with billions of dollars in dispute. Throughout his career, he has obtained outstanding results for those he has represented in cases generally encompassing shareholder derivative and securities litigation, unfair business practices and antitrust litigation, publicity rights and advertising litigation, ERISA litigation, and other insurance, health care, employment, and commercial disputes.

Representative matters in which Shingler has served as a core member of the litigation team or settlement counsel include, among others: *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices & Antitrust Litig.*, No. 2:17-md-02785 (D. Kan.) ($609 million total recovery achieved weeks prior to trial in certified class action alleging antitrust claims involving the illegal reverse payment settlement to delay the generic EpiPen, which allowed the prices of the life-saving EpiPen to rise over 600% in 9 years); *Russo v. Walgreen Co.*, No. 1:17-cv-02246 (N.D. Ill.) ($100 million recovery for class of consumers and third-party payers); *In re Remicade Antitrust Litig.*, No. 2:17-cv-04326 (E.D. Pa.) ($25 million recovery for indirect purchasers in antitrust action); *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 2:16-md-02687 (D.N.J.) (direct purchaser class settled in excess of $100 million); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.*, No. 1:08-cv-10783 (S.D.N.Y.) ($272 million recovery); *In re Royal Dutch/Shell ERISA Litig.*, No. 3:04-cv-00374 (D.N.J.) ($90 million settlement); *In re Priceline.com Sec. Litig.*, No. 3:00-cv-01884 (D. Conn.) ($80 million settlement); *In re General Motors ERISA Litig.*, No. 05-71085 (E.D. Mich.) ($37.5 million settlement, in addition to significant revision of retirement plan administration); *In re 360networks Class Action Sec. Litig.*, No. 1:02-cv-04837 (S.D.N.Y.) ($7 million settlement); and *Rothschild v. Tyco Int'l (US), Inc.*, 83 Cal. App. 4th 488 (2000) (shaped scope of California's Unfair Practices Act as related to limits of State's False Claims Act).

In addition, Shingler is currently working on behalf of plaintiffs in several class actions, including, for example, *In re National Prescription Opiate Litig.*, No. 1:17-md-02804 (N.D. Ohio), and *In re American Airlines/JetBlue Antitrust Litig.*, No. 1:22-cv-07374 (E.D.N.Y.). He is also litigation counsel for the State of Arkansas in its enforcement against multinational corporate pesticide manufacturer Syngenta (*State of Arkansas, ex rel. Tim Griffin, Attorney General v. Syngenta Crop Protection AG*, No. 4:22-cv-01287 (E.D. Ark.).

Education

B.A., Point Loma Nazarene College, 1989; J.D., Boston University School of Law, 1995

Honors / Awards

B.A., *Cum Laude*, Point Loma Nazarene College, 1989

Jessica T. Shinnefield | Partner

Jessica Shinnefield is a partner in the Firm's San Diego office. Currently, her practice focuses on initiating, investigating, and prosecuting securities fraud class actions. Shinnefield served as lead counsel in *In re Am. Realty Cap. Props., Inc. Litig.*, a case arising out of ARCP's manipulative accounting practices, and obtained a $1.025 billion recovery. For five years, she and the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and the Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages of any major PSLRA case prior to trial and includes the largest personal contributions by individual defendants in history. Shinnefield also served as lead counsel in *Smilovits v. First Solar, Inc.*, and obtained a $350 million settlement on the eve of trial. The settlement is fifth-largest PSLRA settlement ever recovered in the Ninth Circuit.

Shinnefield was also a member of the litigation team prosecuting actions against investment banks and leading national credit rating agencies for their roles in structuring and rating structured investment vehicles backed by toxic assets in *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Incorporated* and *King County, Washington v. IKB Deutsche Industriebank AG*. These cases were among the first to successfully allege fraud against the rating agencies, whose ratings have traditionally been protected by the First Amendment. Shinnefield also litigated individual opt-out actions against AOL Time Warner – *Regents of the Univ. of Cal. v. Parsons* and *Ohio Pub. Emps. Ret. Sys. v. Parsons* (recovery more than $600 million). Additionally, she litigated an action against Omnicare, in which she helped obtain a favorable ruling for plaintiffs from the United States Supreme Court. Shinnefield has also successfully appealed lower court decisions in the Second, Seventh, and Ninth Circuit Courts of Appeals.

Education

B.A., University of California at Santa Barbara, 2001; J.D., University of San Diego School of Law, 2004

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Lawyer in America, *Lawdragon*, 2026; Future Star, *Benchmark Litigation*, 2023-2026; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2024; Top Woman Lawyer, *Daily Journal*, 2024; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2023; Plaintiffs' Lawyers Trailblazer, *The National Law Journal*, 2021; Litigator of the Week, *The American Lawyer*, 2020; Rising Star, *Super Lawyers Magazine*, 2015-2019; 40 & Under Hot List, *Benchmark Litigation*, 2018-2019; B.A., *Phi Beta Kappa*, University of California at Santa Barbara, 2001

Elizabeth A. Shonson | Partner

Elizabeth Shonson is a partner in the Firm's Boca Raton office. She concentrates her practice on representing investors in class actions brought pursuant to the federal securities laws. Shonson has litigated numerous securities fraud class actions nationwide, helping achieve significant recoveries for aggrieved investors. She was a member of the litigation teams responsible for recouping millions of dollars for defrauded investors, including: *In re Massey Energy Co. Sec. Litig.* (S.D. W.Va.) ($265 million); *Nieman v. Duke Energy Corp.* (W.D.N.C.) ($146.25 million recovery); *In re ADT Inc. S'holder Litig.* (Fla. Cir. Ct., 15th Jud. Cir.) ($30 million settlement); *Eshe Fund v. Fifth Third Bancorp* (S.D. Ohio) ($16 million); *City of St. Clair Shores Gen. Emps. Ret. Sys. v. Lender Processing Servs., Inc.* (M.D. Fla.) ($14 million); and *In re Synovus Fin. Corp.* (N.D. Ga.) ($11.75 million).

Education

B.A., Syracuse University, 2001; J.D., University of Florida Levin College of Law, 2005

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2016-2019; J.D., *Cum Laude*, University of Florida Levin College of Law, 2005; Editor-in-Chief, *Journal of Technology Law & Policy*; Phi Delta Phi; B.A., with Honors, *Summa Cum Laude*, Syracuse University, 2001; Phi Beta Kappa

Trig Smith | Partner

Trig Smith is a partner in the Firm's San Diego office where he focuses his practice on complex securities litigation. He has been involved in the prosecution of numerous securities class actions that have resulted in over a billion dollars in recoveries for investors. His cases have included: *In re Cardinal Health, Inc. Sec. Litig.* ($600 million recovery); *Jones v. Pfizer Inc.* ($400 million recovery); *Silverman v. Motorola, Inc.* ($200 million recovery); and *City of Livonia Emps.' Ret. Sys. v. Wyeth* ($67.5 million). Most recently, he was a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial.

Education

B.S., University of Colorado, Denver, 1995; M.S., University of Colorado, Denver, 1997; J.D., Brooklyn Law School, 2000

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2024-2027; Member, *Brooklyn Journal of International Law*, Brooklyn Law School; CALI Excellence Award in Legal Writing, Brooklyn Law School

Mark Solomon | Partner

Mark Solomon is a founding and managing partner of the Firm and leads its international litigation practice. Over the last 32 years, he has regularly represented United States and United Kingdom-based pension funds and asset managers in class and non-class securities litigation in federal and state courts throughout the United States. He was first admitted to the Bar of England and Wales as a Barrister (he is non-active) and is an active member of the Bars of Ohio, California, and various United States federal district and appellate courts.

Since joining the practice in 1993, Solomon has spearheaded the prosecution of many significant securities fraud cases, recovering billions of dollars for defrauded investors. The recoveries are the product of multi-million and multi-hundred million dollar pre-trial settlements his teams and his clients have been able to achieve, enhanced by a track record of taking such cases successfully through jury trial where necessary. An additional feature of his practice is the significant corporate governance reforms designed to limit recidivism and promote appropriate standards that he has introduced in the resolution of major cases.

Solomon currently is counsel to a number of U.K. pension funds that are serving or have served as lead plaintiffs in cases throughout the United States in the last ten years. He represented Norfolk Pension Fund in the securities fraud class action against Apple Inc. and Apple executives in *In re Apple Inc. Sec. Litig.* in the federal district court for the Northern District of California, which resulted in a settlement shortly before trial of $490 million payable by the defendants to the investor class – the third-largest ever securities fraud recovery in the Northern District and the fifth-largest in the Ninth Circuit. He represented North East Scotland Pension Fund in the securities fraud class action against Under Armour and Under Armour executives *In re Under Armour Sec. Litig.* in the federal district court for the District of Maryland, which resulted in a settlement shortly before trial of $434 million payable by the defendants to the investor class – the second-largest ever securities fraud recovery in the Fourth Circuit. In addition, the monetary recovery was accompanied by important governance reforms, including the separation of the CEO and BOD Chair and restraints on restricted stock awards to senior executives. He represented the British Coal Staff Superannuation Scheme and the Mineworkers' Pension Scheme in *Smilovits v. First Solar, Inc.* in the federal district court for the District of Arizona in which the class recovered $350 million on the eve of trial. That settlement resulted in the largest-ever securities fraud recovery in the District of Arizona and the seventh-largest in the Ninth Circuit. He represented the U.K.'s Norfolk Pension Fund in *Hsu v. Puma Biotechnology, Inc.* where, in the federal district court for the Central District of California, after three weeks of trial, the Fund obtained a jury verdict valued at over $54 million in favor of the class against the company and its CEO. He represented Strathclyde Pension Fund in *Strathclyde Pension Fund v. Bank OZK*, a class action against Bank OZK and its CEO, in the federal district court for the Eastern District of Arkansas in which the class recovered $45 million. He represented Strathclyde Pension Fund in *In re Ply Gem Holdings, Inc. Sec. Litig.* where the class recovered $26 million. Before all of those cases, in a case in 2000 against Helionetics, Inc. and its senior executives, Solomon had presented to a jury, and won, one of the very few securities fraud class actions ever taken to trial.

In ongoing litigation, Solomon represents Los Angeles County Employees Retirement Association and the class in a securities fraud class action pending against FirstEnergy Corp. and FirstEnergy executives in the federal district court for the Southern District of Ohio and he represents Norfolk Pension Fund and the putative class in the securities fraud class action *In re Anadarko Petroleum Corp. Sec. Litig.* against Anadarko Petroleum Corporation and former Anadarko executives, pending in the federal district court for the Southern District of Texas.

Education

B.A., Trinity College, Cambridge University, England, 1985; L.L.M., Harvard Law School, 1986; Inns of Court School of Law, Degree of Utter Barrister, England, 1987

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2025-2027; Global Plaintiff Lawyer, *Lawdragon*, 2024-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Outstanding Individual Contribution - Service Provider, LGC Investment Awards, *Local Government Chronicle*, 2025; Litigator of the Week, *The AmLaw Litigation Daily*, 2024; Super Lawyer, *Super Lawyers Magazine*, 2017-2018; Recommended Lawyer, *The Legal 500*, 2016-2017; Lizette Bentwich Law Prize, Trinity College, 1983 and 1984; Hollond Travelling Studentship, 1985; Harvard Law School Fellowship, 1985-1986; Member and Hardwicke Scholar of the Honourable Society of Lincoln's Inn

Hillary B. Stakem | Partner

Hillary Stakem is a partner in the Firm's San Diego office, where her practice focuses on complex securities litigation. Stakem was a member of the litigation team in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. She was also a member of the litigation teams that secured a $388 million recovery for investors in J.P. Morgan residential mortgage-backed securities in *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.*, and that obtained a $350 million settlement on the eve of trial in *Smilovits v. First Solar, Inc.*, the fifth-largest PSLRA settlement ever recovered in the Ninth Circuit. Stakem also helped secure a $131 million recovery in favor of plaintiffs in *Bennett v. Sprint Nextel Corp*, a $100 million settlement for shareholders in *Karinski v. Stamps.com*, a $97.5 million recovery in *Marcus v. J.C. Penney Company, Inc.*, and an $87.5 million settlement in *Monroe County Employees' Retirement System v. The Southern Company*.

Education

B.A., College of William and Mary, 2009; J.D., UCLA School of Law, 2012

Honors / Awards

40 & Under List, *Benchmark Litigation*, 2023-2026; 500 X – The Next Generation, *Lawdragon*, 2023-2026; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2024; Rising Star, *Super Lawyers Magazine*, 2021-2022; 40 & Under Hot List, *Benchmark Litigation*, 2021; B.A., *Magna Cum Laude*, College of William and Mary, 2009

Jeffrey J. Stein | Partner

Jeffrey Stein is a partner in the Firm's San Diego office, where he practices securities fraud litigation and other complex matters. He was a member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members are eligible for upwards of $35,000 in restitution. Stein represented the class on a *pro bono* basis.

Before joining the Firm, Stein focused on civil rights litigation, with special emphasis on the First, Fourth, and Eighth Amendments. In this capacity, he helped his clients secure successful outcomes before the United States Supreme Court and the Ninth Circuit Court of Appeals.

Education

B.S., University of Washington, 2005; J.D., University of San Diego School of Law, 2009

Christopher D. Stewart | Partner

Christopher Stewart is a partner in the Firm's San Diego office. His practice focuses on complex securities and shareholder derivative litigation. Stewart served as lead counsel in *In re Am. Realty Cap. Props., Inc. Litig.*, a case arising out of ARCP's manipulative accounting practices, and obtained a $1.025 billion recovery. For five years, he and the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and the Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages of any major PSLRA case prior to trial and includes the largest personal contributions by individual defendants in history. Most recently, Stewart served as lead counsel in *Smilovits v. First Solar, Inc.*, and obtained a $350 million settlement on the eve of trial. The settlement is fifth-largest PSLRA settlement ever recovered in the Ninth Circuit.

He was also part of the litigation team that obtained a $67 million settlement in *City of Westland Police & Fire Ret. Sys. v. Stumpf*, a shareholder derivative action alleging that Wells Fargo participated in the mass-processing of home foreclosure documents by engaging in widespread robo-signing. Stewart also served on the litigation team in *In re Deutsche Bank AG Sec. Litig.*, in which the Firm obtained a $18.5 million settlement in a case against Deutsche Bank and certain of its officers alleging violations of the Securities Act of 1933.

Education

B.S., Santa Clara University, 2004; M.B.A., University of San Diego School of Business Administration, 2009; J.D., University of San Diego School of Law, 2009

Honors / Awards

California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2024; Rising Star, *Super Lawyers Magazine*, 2015-2020; J.D., *Magna Cum Laude*, Order of the Coif, University of San Diego School of Law, 2009; Member, *San Diego Law Review*

Sabrina E. Tirabassi | Partner

Sabrina Tirabassi is a partner in the Firm's Boca Raton office, where her practice focuses on complex securities litigation, including the Firm's lead plaintiff motion practice. In this role, Tirabassi remains at the forefront of litigation trends and issues arising under the Private Securities Litigation Reform Act of 1995. Further, Tirabassi has been an integral member of the litigation teams responsible for securing significant monetary recoveries on behalf of shareholders, including: *Villella v. Chemical and Mining Company of Chile Inc.*, No. 1:15-cv-02106 (S.D.N.Y.); *In re ADT Inc. S'holder Litig.*, No. 502018CA003494XXXXMB-AG (Fla. Cir. Ct., 15th Jud. Cir.); *KBC Asset Mgmt. NV v. Aegerion Pharms., Inc.*, No. 1:14-cv-10105-MLW (D. Mass.); *Sohal v. Yan*, No. 1:15-cv-00393-DAP (N.D. Ohio); *McGee v. Constant Contact, Inc.*, No. 1:15-cv-13114-MLW (D. Mass.); and *Schwartz v. Urban Outfitters, Inc.*, No. 2:13-cv-05978-MAK (E.D. Pa.).

Education

B.A., University of Florida, 2000; J.D., Nova Southeastern University Shepard Broad College of Law, 2006, *Magna Cum Laude*

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2024-2025; Rising Star, *Super Lawyers Magazine*, 2010, 2015-2018; J.D., *Magna Cum Laude*, Nova Southeastern University Shepard Broad College of Law, 2006

Michael A. Troncoso | Partner

Michael Troncoso is a partner with the Firm. His practice focuses on securities fraud class action litigation and advising institutional investors in the United States, Canada, and the European Union on corporate governance and global policy issues. Prior to joining the Firm, Troncoso served as a prosecutor, senior in-house counsel, and legal and policy advisor across numerous sectors. He served as chief counsel and chief of public policy to then-California Attorney General Kamala D. Harris, overseeing the office's priority litigation, enforcement, and legislative matters. In this role, he served as lead counsel for the State of California in securing the National Mortgage Settlement, the largest consumer financial protection settlement in state history that brought $20 billion in loan relief and direct payments to California homeowners. He led the state's Mortgage Fraud Task Force and its investigations of securities law violations arising from the issuance of residential mortgage-backed securities. His team recovered nearly $1 billion in RMBS-related losses for California public pension funds.

Earlier in his career, Troncoso served for nearly six years as a trial attorney and assistant chief attorney for policy in the San Francisco District Attorney's office, where he tried multiple criminal cases to jury verdict and led the office's mortgage and investment fraud team, where he was responsible for investigating and prosecuting complex financial crimes from initial report through charging and trial.

Troncoso most recently served as Vice President at the Chan Zuckerberg Initiative, a philanthropic organization, where he led bipartisan policy and advocacy efforts nationwide. He also served in the University of California's Office of General Counsel as managing counsel for health affairs and technology law and chief campus counsel, where he oversaw various litigation, regulatory, and data protection matters.

Education

B.A., University of California at Berkeley, 1999; J.D., Georgetown University Law Center, 2002

Honors / Awards

Global Plaintiff Lawyer, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2026; Top 20 Under 40, *Daily Journal*, 2012

Douglas Wilens | Partner

Douglas Wilens is a partner in the Firm's Boca Raton office. Wilens is a member of the Firm's Appellate Practice Group, participating in numerous appeals in federal and state courts across the country. Most notably, Wilens handled successful and precedent-setting appeals in *Ind. Pub. Ret. Sys. v. SAIC, Inc.*, 818 F.3d 85 (2d Cir. 2016) (addressing duty to disclose under SEC Regulation Item 303 in §10(b) case), *Mass. Ret. Sys. v. CVS Caremark Corp.*, 716 F.3d 229 (1st Cir. 2013) (addressing pleading of loss causation in §10(b) case), and *Lormand v. US Unwired, Inc.*, 565 F.3d 228 (5th Cir. 2009) (addressing pleading of falsity, scienter, and loss causation in §10(b) case).

Before joining the Firm, Wilens was an associate at a nationally recognized firm, where he litigated complex actions on behalf of numerous professional sports leagues, including the National Basketball Association, the National Hockey League, and Major League Soccer. He has also served as an adjunct professor at Florida Atlantic University and Nova Southeastern University, where he taught undergraduate and graduate-level business law classes.

Education

B.S., University of Florida, 1992; J.D., University of Florida College of Law, 1995

Honors / Awards

Book Award for Legal Drafting, University of Florida College of Law; J.D., with Honors, University of Florida College of Law, 1995

Shawn A. Williams | Partner

Shawn Williams, a founding partner of the Firm, is the managing partner of the Firm's San Francisco office and a member of the Firm's Management Committee. Williams specializes in complex commercial litigation focusing on securities litigation and has served as lead counsel in a range of precedent-setting actions that recovered billions of dollars for investors and consumers. Williams recently served as lead counsel in a globally watched securities class action case against Apple, *In re Apple Inc. Sec. Litig.* He and the trial team secured a $490 million recovery for injured investors. Williams was among lead counsel in *In re Facebook Biometric Info. Privacy Litig.*, charging Facebook with violations of the Illinois Biometric Information Privacy Act, resulting in a $650 million recovery for injured Facebook users, which was then the largest ever biometric class action.

Williams also led the team of Robbins Geller attorneys in the investigation and drafting of comprehensive securities fraud claims in *Hefler v. Wells Fargo & Co.*, alleging widespread opening of unauthorized and undisclosed customer accounts. The *Hefler* action resulted in the recovery of $480 million for Wells Fargo investors. In *City of Westland Police & Fire Ret. Sys. v. Metlife, Inc.*, Williams led the Firm's team of lawyers alleging MetLife's failure to disclose and account for the scope of its use and non-use of the Social Security Administration Death Master File and its impact on MetLife's financial statements. The *Metlife* action resulted in a recovery of $84 million. Williams also served as lead counsel in the following actions resulting in significant recoveries: *Chicago Laborers Pension Fund v. Alibaba Grp. Holding Ltd.* ($75 million recovery); *In re Krispy Kreme Doughnuts, Inc. Sec. Litig.* ($75 million recovery); *In re Medtronic, Inc. Sec. Litig.* ($43 million recovery); *In re Cadence Design Sys., Inc. Sec. Litig.* ($38 million recovery); and *City of Sterling Heights Gen. Emps'. Ret. Sys. v. Prudential Fin., Inc.* ($33 million recovery).

Williams is also a member of the Firm's Shareholder Derivative Practice Group, which has secured tens of millions of dollars in cash recoveries and comprehensive corporate governance reforms in a number of high-profile cases including: *In re McAfee, Inc. Derivative Litig.*; *In re Marvell Tech. Grp. Ltd. Derivative Litig.*; *In re KLA-Tencor Corp. S'holder Derivative Litig.*; *The Home Depot, Inc. Derivative Litig.*; and *City of Westland Police & Fire Ret. Sys. v. Stumpf (Wells Fargo & Co.)*.

Before joining the Firm in 2000, Williams served for 5 years as an Assistant District Attorney in the Manhattan District Attorney's Office, where he tried over 20 cases to New York City juries.

Education

B.A., The State of University of New York at Albany, 1991; J.D., University of Illinois, 1995

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2022-2027; Super Lawyer, *Super Lawyers Magazine*, 2014-2017, 2020-2021, 2023-2026; Managing Partner You Need to Know, *Lawdragon*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Lawyer in America, *Lawdragon*, 2018-2026; Litigation Star, *Benchmark Litigation*, 2025-2026; Recommended Lawyer, *The Legal 500*, 2023-2025; Leading Commercial Litigator, *Daily Journal*, 2025; Litigator of the Week, *The AmLaw Litigation Daily*, 2024; Top Plaintiff Lawyer, *Daily Journal*, 2022; Most Influential Black Lawyers, *Savoy*, 2022; Legend, *Lawdragon*, 2022; Top 100 Lawyer, *Daily Journal*, 2019, 2021; California Trailblazer, *The Recorder*, 2019; Titan of the Plaintiffs Bar, *Law360*, 2019; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2019; Board Member, California Bar Foundation, 2012-2014

Christopher M. Wood | Partner

Christopher Wood is the partner in charge of Robbins Geller Rudman & Dowd LLP's Nashville office, where his practice focuses on complex securities litigation. He has been a member of litigation teams responsible for recoveries totaling hundreds of millions of dollars for investors, including some of the largest securities class action recoveries in Tennessee history. His cases include: *In re Massey Energy Co. Sec. Litig.* ($265 million recovery); *In re Envision Healthcare Co. Sec. Litig.* ($177.5 million recovery); *In re VeriFone Holdings, Inc. Sec. Litig.* ($95 million recovery); *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.* ($65 million recovery); *Grae v. Corrections Corporation of America* ($56 million recovery); *In re Micron Tech., Inc. Sec. Litig.* ($42 million recovery); *Jackson Cnty. Emps.' Ret. Sys. v. Ghosn* ($36 million recovery); and *Winslow v. BancorpSouth, Inc.* ($29.5 million recovery).

Working together with the ACLU of Tennessee and Public Funds Public Schools (a national campaign founded by the Southern Poverty Law Center and Education Law Center), Wood is litigating an action challenging Tennessee's school voucher program, which diverts critically needed funds from public school students in Nashville and Memphis. Wood has also provided *pro bono* legal services through Tennessee Justice for Our Neighbors, Volunteer Lawyers & Professionals for the Arts, the Ninth Circuit's Pro Bono Program, and the San Francisco Bar Association's Volunteer Legal Services Program.

Education

B.A., Vanderbilt University, 2003; J.D., University of San Francisco School of Law, 2006

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2025-2027; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026; Future Star, *Benchmark Litigation*, 2023-2026; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2023-2024; 40 & Under Hot List, *Benchmark Litigation*, 2021; Rising Star, *Super Lawyers Magazine*, 2011-2013, 2015-2020

Debra J. Wyman | Partner

Debra Wyman is a partner in the Firm's San Diego office. She specializes in securities litigation and has litigated numerous cases against public companies in state and federal courts that have resulted in over $2 billion in securities fraud recoveries. Wyman served as lead counsel in *In re Am. Realty Cap. Props., Inc. Litig.*, a case arising out of ARCP's manipulative accounting practices, and obtained a $1.025 billion recovery. For five years, she and the litigation team prosecuted nine different claims for violations of the Securities Exchange Act of 1934 and the Securities Act of 1933, involving seven different stock or debt offerings and two mergers. The recovery represents the highest percentage of damages of any major PSLRA case prior to trial and includes the largest personal contributions by individual defendants in history. Most recently, Wyman was part of the litigation team in *Monroe County Employees' Retirement System v. The Southern Company* in which an $87.5 settlement was reached after three years of litigation. The settlement resolved claims for violations of the Securities Exchange Act of 1934 stemming from defendants' issuance of materially misleading statements and omissions regarding the status of construction of a first-of-its-kind "clean coal" power plant that was designed to transform coal into synthetic gas that could then be used to fuel the power plant.

Wyman was also a member of the trial team in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery achieved represents more than 30% of the aggregate classwide damages, far exceeding the typical recovery in a securities class action. Wyman prosecuted the complex securities and accounting fraud case *In re HealthSouth Corp. Sec. Litig.*, one of the largest and longest-running corporate frauds in history, in which $671 million was recovered for defrauded HealthSouth investors. She was also part of the trial team that litigated *In re AT&T Corp. Sec. Litig.*, which was tried in the United States District Court, District of New Jersey, and settled after only two weeks of trial for $100 million. Wyman was also part of the litigation team that secured a $64 million recovery for Dana Corp. shareholders in *Plumbers & Pipefitters National Pension Fund v. Burns*, in which the Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action.

Education

B.A., University of California Irvine, 1990; J.D., University of San Diego School of Law, 1997

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Lawyer in America, *Lawdragon*, 2020-2026; Litigation Star, *Benchmark Litigation*, 2023-2026; National Practice Area Star, *Benchmark Litigation*, 2024-2026; California - Litigation Star, *Benchmark Litigation*, 2024-2025; California Lawyer Attorney of the Year (CLAY), *Daily Journal*, 2024; Top 250 Women in Litigation, *Benchmark Litigation*, 2021, 2023-2024; San Diego Litigator of the Year, *Benchmark Litigation*, 2021; Plaintiff Litigator of the Year, *Benchmark Litigation*, 2021; Top Woman Lawyer, *Daily Journal*, 2017, 2020; MVP, *Law360*, 2020; Litigator of the Week, *The American Lawyer*, 2020; Litigator of the Year, *Our City San Diego*, 2017; Super Lawyer, *Super Lawyers Magazine*, 2016-2017

Susan K. Alexander | Of Counsel

Susan Alexander is Of Counsel to the Firm and is based in the San Francisco office. Alexander's practice specializes in federal appeals of securities fraud class actions on behalf of investors. With nearly 30 years of federal appellate experience, she has argued on behalf of defrauded investors in circuit courts throughout the United States. Among her most notable cases are *Mineworkers' Pension Scheme v. First Solar Inc.* ($350 million recovery), *In re VeriFone Holdings, Inc. Sec. Litig.* ($95 million recovery), and the successful appellate ruling in *Alaska Elec. Pension Fund v. Flowserve Corp.* ($55 million recovery). Other representative results include: *Stoyas v. Toshiba Corp.*, 896 F.3d 933 (9th Cir. 2018) (reversing dismissal of securities fraud action and holding that the Exchange Act applies to unsponsored American Depositary Shares); *W. Va. Pipe Trades Health & Welfare Fund v. Medtronic, Inc.*, 845 F.3d 384 (8th Cir. 2016) (reversing summary judgment of securities fraud action on statute of limitations grounds); *In re Ubiquiti Networks, Inc. Sec. Litig.*, 669 F. App'x 878 (9th Cir. 2016) (reversing dismissal of §11 claim); *Carpenters Pension Tr. Fund of St. Louis v. Barclays PLC*, 750 F.3d 227 (2d Cir. 2014) (reversing dismissal of securities fraud complaint, focused on loss causation); *Panther Partners Inc. v. Ikanos Commc'ns, Inc.*, 681 F.3d 114 (2d Cir. 2012) (reversing dismissal of §11 claim); *City of Pontiac Gen. Emps.' Ret. Sys. v. MBIA, Inc.*, 637 F.3d 169 (2d Cir. 2011) (reversing dismissal of securities fraud complaint, focused on statute of limitations); *In re Gilead Scis. Sec. Litig.*, 536 F.3d 1049 (9th Cir. 2008) (reversing dismissal of securities fraud complaint, focused on loss causation); *Barrie v. Intervoice-Brite, Inc.*, 397 F.3d 249 (5th Cir.) (reversing dismissal of securities fraud complaint, focused on scienter), *reh'g denied and op. modified*, 409 F.3d 653 (5th Cir. 2005); and *Pirraglia v. Novell, Inc.*, 339 F.3d 1182 (10th Cir. 2003) (reversing dismissal of securities fraud complaint, focused on scienter). Alexander's prior appellate work was with the California Appellate Project ("CAP"), where she prepared appeals and petitions for writs of *habeas corpus* on behalf of individuals sentenced to death. At CAP, and subsequently in private practice, she litigated and consulted on death penalty direct and collateral appeals for ten years.

Education

B.A., Stanford University, 1983; J.D., University of California, Los Angeles, 1986

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2015-2021, 2026; Best Lawyer in America: One to Watch, *Best Lawyers®*, 2026; American Academy of Appellate Lawyers; California Academy of Appellate Lawyers; Ninth Circuit Advisory Rules Committee; Appellate Delegate, Ninth Circuit Judicial Conference; ABA Council of Appellate Lawyers

Laura M. Andracchio | Of Counsel

Laura Andracchio is Of Counsel in the Firm's San Diego office. Having joined the Firm in 1997, she was a Robbins Geller partner before her role as Of Counsel. As a partner with the Firm, Andracchio led dozens of securities fraud cases against public companies throughout the country, recovering hundreds of millions of dollars for injured investors. Her current focus remains securities fraud litigation under the federal securities laws.

Most recently, Andracchio was a member of the litigation team that obtained a $350 million recovery for the class in 2024 in *In re Alphabet, Inc. Sec. Litig.* (N.D. Cal.). Andracchio was also part of the litigation teams in *In re American Realty Cap. Props., Inc. Litig.* (S.D.N.Y.), in which a $1.025 billion recovery was obtained; *City of Pontiac Gen. Emps.' Ret. Sys. v. Wal-Mart Stores, Inc.* (W.D. Ark.), recovering $160 million for Wal-Mart investors; and *In re Cardinal Health, Inc. Sec. Litig.* (S.D. Ohio) ($109 million).

Andracchio was also a lead member of the trial team in *In re AT&T Corp. Sec. Litig.*, recovering $100 million for the class after two weeks of trial in district court in New Jersey. Before trial, she managed and litigated the case for four years. She also led the trial team in *Brody v. Hellman*, a case against Qwest and former directors of U.S. West seeking an unpaid dividend, recovering $50 million for the class, which was largely comprised of U.S. West retirees. Some of Andracchio's other cases include *Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.* (S.D.N.Y.) ($388 million on behalf of investors in residential mortgage-backed securities); *City of Hialeah Emps.' Ret. Sys. v. Toll Bros., Inc.*; *Ross v. Abercrombie & Fitch Co.*; *In re GMH Cmtys. Tr. Sec. Litig.*; *In re Vicuron Pharms., Inc. Sec. Litig.*; and *In re Navarre Corp. Sec. Litig.*

Education

B.A., Bucknell University, 1986; J.D., Duquesne University School of Law, 1989

Honors / Awards

Order of the Barristers, J.D., with honors, Duquesne University School of Law, 1989

Jason M. Avellino | Of Counsel

Jason Avellino is Of Counsel in the Firm's Wilmington office. He focuses his practice on corporate governance, shareholder rights, and complex securities litigation.

Before joining Robbins Geller, Avellino practiced at a prominent Delaware law firm, where he was a significant part of litigation teams that achieved substantial recoveries and meaningful governance reforms for investors. He also spent more than a decade representing major product manufacturers, contractors, marine terminal operators, retail establishments, and sports venues (including several Fortune 500 companies) in the evaluation and defense of commercial matters and civil lawsuits. During that time, Avellino was a member of the International Association of Defense Counsel (IADC), a group of approximately 2,500 invitation-only, peer-reviewed members comprised of the world's leading corporate and insurance lawyers and insurance executives.

Education

B.S., Bloomsburg University, 2007; J.D., Villanova University School of Law, 2010

Honors / Awards

B.S., *Magna Cum Laude*, Bloomsburg University, 2007

Matthew J. Balotta | Of Counsel

Matt Balotta is Of Counsel in the Firm's San Diego office, where his practice focuses on securities fraud litigation. Balotta earned his Bachelor of Arts degree in History, *summa cum laude*, from the University of Pittsburgh and his Juris Doctor degree from Harvard Law School. During law school, Balotta was a summer associate with the Firm and interned at the National Consumer Law Center. He also participated in the Employment Law and Delivery of Legal Services Clinics and served on the General Board of the Harvard Civil Rights-Civil Liberties Law Review.

Education

B.A., University of Pittsburgh, 2005; J.D., Harvard Law School, 2015

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2026-2027; B.A., *Summa Cum Laude,* University of Pittsburgh, 2005

Randi D. Bandman | Of Counsel

Randi Bandman is Of Counsel in the Firm's San Diego office. Throughout her career, she has represented and advised hundreds of clients, including pension funds, managers, banks, and hedge funds, such as the Directors Guild of America, Screen Actors Guild, Writers Guild of America, and Teamster funds. Bandman's cases have yielded billions of dollars of recoveries. Notable cases include the AOL Time Warner, Inc. merger ($629 million), *In re Enron Corp. Sec. Litig.* ($7.2 billion), Private Equity litigation (*Dahl v. Bain Cap. Partners, LLC*) ($590.5 million), *In re WorldCom Sec. Litig.* ($657 million), and *In re Facebook Biometric Info. Privacy Litig.* ($650 million).

Bandman is currently representing plaintiffs in the Foreign Exchange Litigation pending in the Southern District of New York which alleges collusive conduct by the world's largest banks to fix prices in the $5.3 trillion a day foreign exchange market and in which billions of dollars have been recovered to date for injured plaintiffs. Bandman is part of the Robbins Geller Co-Lead Counsel team representing the class in the "High Frequency Trading" case, which accuses stock exchanges of giving unfair advantages to high-speed traders versus all other investors, resulting in billions of dollars being diverted. Bandman was instrumental in the landmark state settlement with the tobacco companies for $12.5 billion. Bandman also led an investigation with congressional representatives on behalf of artists into allegations of "pay for play" tactics, represented Emmy winning writers with respect to their claims involving a long-running television series, represented a Hall of Fame sports figure, and negotiated agreements in connection with a major motion picture. Recently, Bandman was chosen to serve on the Law Firm Advisory Board of the Association of Media & Entertainment Counsel, an organization made up of thousands of attorneys from studios, networks, guilds, talent agencies, and top media companies, dealing with protecting content distributed through a variety of formats worldwide.

Education

B.A., University of California, Los Angeles; J.D., University of Southern California

Mary K. Blasy | Of Counsel

Mary Blasy is Of Counsel to the Firm and is based in the Firm's Melville and Washington, D.C. offices. Her practice focuses on the investigation, commencement, and prosecution of securities fraud class actions and shareholder derivative suits. Blasy has recovered hundreds of millions of dollars for investors in securities fraud class actions against Reliance Acceptance Corp. ($66 million); Sprint Corp. ($50 million); Titan Corporation ($15+ million); Martha Stewart Omni-Media, Inc. ($30 million); and Coca-Cola Co. ($137.5 million). Blasy has also been responsible for prosecuting numerous complex shareholder derivative actions against corporate malefactors to address violations of the nation's securities, environmental, and labor laws, obtaining corporate governance enhancements valued by the market in the billions of dollars.

In 2014, the Presiding Justice of the Appellate Division of the Second Department of the Supreme Court of the State of New York appointed Blasy to serve as a member of the Independent Judicial Election Qualification Commission, which until December 2018 reviewed the qualifications of candidates seeking public election to New York State Supreme Courts in the 10th Judicial District. She also served on the *Law360* Securities Editorial Advisory Board from 2015 to 2016.

Education

B.A., California State University, Sacramento, 1996; J.D., UCLA School of Law, 2000

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2016-2020, 2023-2026; *Law360* Securities Editorial Advisory Board, 2015-2016; Member, Independent Judicial Election Qualification Commission, 2014-2018

M. Lamontt Bowens | Of Counsel

Lamontt Bowens is Of Counsel to Robbins Geller in the Firm's Washington, D.C. office. He is a member of the Firm's client outreach team where his focus is working with the Firm's institutional investor clients.

Bowens began his career with Robbins Geller working in the fax and mailroom while attending college and law school at night. After his first year of law school, he worked as a summer associate with the Firm. Following his second year of law school, Bowens worked as a summer intern in the office of the San Diego County Public Defender, where he worked at the direction of his supervising attorneys representing indigent clients. After graduating from law school and passing the bar exam, Bowens was a Staff Attorney where he worked on securities, antitrust, and consumer cases in Robbins Geller's San Diego office.

Bowens has written and regularly speaks about his challenging experiences as a youth in the inner city and his unorthodox journey to becoming a lawyer. He has been a mentor to at-risk youth and is an advocate for programs designed to promote second chances for the formerly incarcerated.

Bowens is a dedicated member of the National Association of Securities Professionals (NASP) and the National Bar Association (NBA).

Education

B.S., University of Phoenix, 2004; J.D., Golden Gate University School of Law, 2010

Douglas R. Britton | Of Counsel

Douglas Britton is based in the Firm's San Diego office. His practice focuses on securities fraud and corporate governance. Britton has been involved in settlements exceeding $1 billion and has secured significant corporate governance enhancements to improve corporate functioning.

Notable achievements include *In re WorldCom, Inc. Sec. & "ERISA" Litig.*, where he was one of the lead partners that represented a number of opt-out institutional investors and secured an unprecedented recovery of $651 million; *In re SureBeam Corp. Sec. Litig.*, where he was the lead trial counsel and secured an impressive recovery of $32.75 million; and *In re Amazon.com, Inc. Sec. Litig.*, where he was one of the lead attorneys securing a $27.5 million recovery for investors.

Education

B.B.A., Washburn University, 1991; J.D., Pepperdine University School of Law, 1996, *cum laude*

William K. Cavanagh, Jr. | Of Counsel

Bill Cavanagh is Of Counsel in the Firm's Washington, D.C. office. Cavanagh concentrates his practice in employee benefits law and works with the Firm's Institutional Outreach Team. Prior to joining Robbins Geller, Cavanagh was employed by Ullico for the past nine years, most recently as President of Ullico Casualty Group. The Ullico Casualty Group is the leading provider of fiduciary liability insurance for trustees in both the private as well as the public sector. Prior to that he was President of the Ullico Investment Company.

Preceding Cavanagh's time at Ullico, he was a partner at the labor and employee benefits firm Cavanagh and O'Hara in Springfield, Illinois for 28 years. In that capacity, Cavanagh represented public pension funds, jointly trusteed Taft-Hartley, health, welfare, pension, and joint apprenticeship funds advising on fiduciary and compliance issues both at the Board level as well as in administrative hearings, federal district courts, and the United States Courts of Appeals. During the course of his practice, Cavanagh had extensive trial experience in state and the relevant federal district courts. Additionally, Cavanagh served as co-counsel on a number of cases representing trustees seeking to recover plan assets lost as a result of fraud in the marketplace.

Education

B.A., Georgetown University, 1974; J.D., John Marshall Law School, 1978

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell

Christopher Collins | Of Counsel

Christopher Collins is Of Counsel in the Firm's San Diego office and his practice focuses on antitrust and consumer protection. Collins served as co-lead counsel in *Wholesale Elec. Antitrust Cases I & II*, charging an antitrust conspiracy by wholesale electricity suppliers and traders of electricity in California's newly deregulated wholesale electricity market wherein plaintiffs secured a global settlement for California consumers, businesses, and local governments valued at more than $1.1 billion. He was also involved in California's tobacco litigation, which resulted in the $25.5 billion recovery for California and its local entities. Collins is currently counsel on the California Energy Manipulation antitrust litigation, the Memberworks upsell litigation, as well as a number of consumer actions alleging false and misleading advertising and unfair business practices against major corporations. He formerly served as a Deputy District Attorney for Imperial County where he was in charge of the Domestic Violence Unit.

Education

B.A., Sonoma State University, 1988; J.D., Thomas Jefferson School of Law, 1995

Vicki Multer Diamond | Of Counsel

Vicki Multer Diamond is Of Counsel to the Firm and is based in the Firm's Melville office. She has over 25 years of experience as an investigator and attorney. Her practice at the Firm focuses on the initiation, investigation, and prosecution of securities fraud class actions. Diamond played a significant role in the factual investigations and successful oppositions to the defendants' motions to dismiss in a number of cases, including *Tableau*, *One Main*, *Valeant*, and *Orbital ATK*.

Diamond has served as an investigative consultant to several prominent law firms, corporations, and investment firms. Before joining the Firm, she was an Assistant District Attorney in Brooklyn, New York, where she served as a senior Trial Attorney in the Felony Trial Bureau, and was special counsel to the Special Commissioner of Investigations for the New York City schools, where she investigated and prosecuted crime and corruption within the New York City school system.

Education

B.A., State University of New York at Binghamton, 1990; J.D., Hofstra University School of Law, 1993

Honors / Awards

Member, *Hofstra Property Law Journal*, Hofstra University School of Law

Michael J. Dowd | Of Counsel

Mike Dowd was a founding partner of the Firm. He has practiced in the area of securities litigation for 20 years, prosecuting dozens of complex securities cases and obtaining significant recoveries for investors in cases such as *American Realty* ($1.025 billion), *UnitedHealth* ($925 million), *WorldCom* ($657 million), *AOL Time Warner* ($629 million), *Qwest* ($445 million), *Under Armour* ($434 million), and *Pfizer* ($400 million).

Dowd served as lead trial counsel in *Jaffe v. Household International* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Dowd also served as the lead trial lawyer in *In re AT&T Corp. Sec. Litig.*, which was tried in the District of New Jersey and settled after only two weeks of trial for $100 million. Dowd served as an Assistant United States Attorney in the Southern District of California from 1987-1991, and again from 1994-1998, where he handled dozens of jury trials and was awarded the Director's Award for Superior Performance.

Education

B.A., Fordham University, 1981; J.D., University of Michigan Law School, 1984

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Director's Award for Superior Performance, United States Attorney's Office; Best Lawyer in America, *Best Lawyers®*, 2015-2027; Recommended Lawyer, *The Legal 500*, 2016-2019, 2023-2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Hon. David H. Bartick Award for Civility and Professionalism, U.S. District Court for the Southern District of California, 2024; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2022; Southern California Best Lawyer, *Best Lawyers®*, 2015-2021; Super Lawyer, *Super Lawyers Magazine*, 2010-2020; Lawyer of the Year, *Best Lawyers®*, 2020; Hall of Fame, *Lawdragon*, 2018; Litigator of the Year, *Our City San Diego*, 2017; Leading Lawyer in America, *Lawdragon*, 2014-2016; Litigator of the Week, *The American* Lawyer, 2015; Litigation Star, *Benchmark Litigation* 2013; Directorship 100, NACD Directorship, 2012; Attorney of the Year, *California Lawyer*, 2010; Top 100 Lawyers, *Daily Journal*, 2009; B.A., *Magna Cum Laude*, Fordham University, 1981

Travis E. Downs III | Of Counsel

Travis Downs is Of Counsel to the Firm in the Firm's San Diego office. His areas of expertise include prosecution of shareholder and securities litigation, including complex shareholder derivative actions. Downs is a member of the Firm's Delaware Practice Group. Downs led a team of lawyers who successfully prosecuted over 65 stock option backdating derivative actions in federal and state courts across the country, resulting in hundreds of millions in financial givebacks for the plaintiffs and extensive corporate governance enhancements, including annual directors elections, majority voting for directors, and shareholder nomination of directors. Notable cases include: *In re Community Health Sys., Inc. S'holder Derivative Litig.* ($60 million in financial relief and unprecedented corporate governance reforms); *In re Marvell Tech. Grp. Ltd. Derivative Litig.* ($54 million in financial relief and extensive corporate governance enhancements); *In re McAfee, Inc. Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re Affiliated Computer Servs. Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re KB Home S'holder Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re Juniper Networks Derivative Litig.* ($22.7 million in financial relief and extensive corporate governance enhancements); *In re Nvidia Corp. Derivative Litig.* ($15 million in financial relief and extensive corporate governance enhancements); and *City of Pontiac Gen. Emps.' Ret. Sys. v. Langone* (achieving landmark corporate governance reforms for investors).

Downs was also part of the litigation team that obtained a $67 million settlement in *City of Westland Police & Fire Ret. Sys. v. Stumpf*, a shareholder derivative action alleging that Wells Fargo participated in the mass-processing of home foreclosure documents by engaging in widespread robo-signing, and a $250 million settlement in *In re Google, Inc. Derivative Litig.*, an action alleging that Google facilitated in the improper advertising of prescription drugs. Downs is a frequent speaker at conferences and seminars and has lectured on a variety of topics related to shareholder derivative and class action litigation.

Education

B.A., Whitworth University, 1985; J.D., University of Washington School of Law, 1990

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Best Lawyer in America, *Best Lawyers®*, 2018-2027; Recommended Lawyer, *The Legal 500*, 2023-2024; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2024; Top 100 Leaders in Law Honoree, *San Diego Business Journal*, 2022; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2022; Southern California Best Lawyer, *Best Lawyers®*, 2018-2021; Super Lawyer, *Super Lawyers Magazine*, 2008; B.A., Honors, Whitworth University, 1985

Jason A. Forge | Of Counsel

Jason Forge is Of Counsel in the Firm's San Diego office. He specializes in complex investigations, litigation, and trials. As a federal prosecutor and private practitioner, Forge has conducted and supervised scores of jury and bench trials in federal and state courts, including the month-long trial of a defense contractor who conspired with Congressman Randy "Duke" Cunningham in the largest bribery scheme in congressional history. He recently obtained a $350 million settlement with Alphabet, Inc., which was made possible only by first winning a unanimous published appellate decision, reversing a district court order that had dismissed the entire case. This is the largest ever post-reversal securities fraud recovery in the Ninth Circuit.

In addition to Alphabet, Forge has secured nine-figure payouts from other corporate goliaths, including Wal-Mart ($160 million) and Pfizer ($400 million). *City of Pontiac General Employees' Retirement System v. Wal-Mart Stores, Inc.* was the first successful securities fraud case against Wal-Mart. And in the case against Pfizer, Forge led an investigation that uncovered key documents that Pfizer had not produced in discovery. Although fact discovery in the case had already closed, the district judge ruled that the documents had been improperly withheld and ordered that discovery be reopened, including reopening the depositions of Pfizer's former CEO, CFO, and General Counsel. Less than six months after completing these depositions, Pfizer settled the case for $400 million.

Forge also was a key member of the Firm's winning trial team in *Hsu v. Puma Biotechnology, Inc.* – one of only 13 securities fraud class action verdicts for investors in nearly 30 years. After that trial victory, Forge joined a Robbins Geller litigation team that had defeated 12 motions for summary judgment against 40 defendants and was about to depose 17 experts in the home stretch to trial. Forge led the effort to use these depositions to disprove a truth-on-the-market argument that nine defense experts had embraced. After the last of these expert depositions, the defendants dropped their lead truth-on-the-market expert and the Robbins Geller team secured a $1.025 billion settlement from American Realty Capital Properties and other defendants that included a record $237 million contribution from individual defendants and represented more than twice the recovery rate obtained by several funds that had opted out of the class.

Forge was a key member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions, including a federal RICO charge, against President Donald J. Trump. The settlement returned over 90% of the money thousands of students paid to "enroll" in Trump University. He represented the class on a *pro bono* basis. Forge successfully prosecuted another federal RICO case against Scotts Miracle-Gro, resulting in full refunds (totaling over $40 million) for customers who purchased bird feed that Scotts had illegally treated with a pesticide known to be hazardous to birds. He was also a member of the litigation team that obtained a $125 million settlement in *In re LendingClub Securities Litigation*, a settlement that ranked among the top ten largest securities recoveries ever in the Northern District of California.

Education

B.B.A., The University of Michigan Ross School of Business, 1990; J.D., The University of Michigan Law School, 1993

Honors / Awards

Ranked by *Chambers USA*, 2026; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2026; Leading Lawyer in America, *Lawdragon*, 2022-2026; Litigation Star, *Benchmark Litigation*, 2023-2026; National Practice Area Star, *Benchmark Litigation*, 2026; Leading Litigator in America, *Lawdragon*, 2026; Plaintiff

Litigator of the Year, *Benchmark Litigation*, 2025; Impact Case Award: *In re Alphabet, Inc. Securities Litigation*, *Benchmark Litigation*, 2025; Recommended Lawyer, *The Legal 500*, 2023-2024; Best Lawyer in America, *Best Lawyers®*, 2019-2023; Southern California Best Lawyer, *Best Lawyers®*, 2019-2021; Local Litigation Star, *Benchmark Litigation*, 2020; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2018; Top 100 Lawyer, *Daily Journal*, 2017; Litigator of the Year, *Our City San Diego,* 2017; Two-time recipient of Department of Justice's Director's Award for Superior Performance by Litigation Team; numerous commendations from Federal Bureau of Investigation (including commendation from FBI Director Robert Mueller III), Internal Revenue Service, and Defense Criminal Investigative Service; J.D., *Magna Cum Laude*, Order of the Coif, The University of Michigan Law School, 1993; B.B.A., High Distinction, The University of Michigan Ross School of Business, 1990

Christopher T. Gilroy | Of Counsel

Christopher Gilroy is Of Counsel in the Firm's Manhattan office. His practice focuses on complex securities litigation. Since joining the Firm, Gilroy has played a significant role in the following litigations: *Landmen Partners, Inc. v. The Blackstone Grp., L.P* ($85 million recovery on the eve of trial); *In re OSG Sec. Litig.* ($34 million recovery, representing 87% of the maximum Section 11 damages); *City of Austin Police Ret. Sys. v. Kinross Gold Corp.* ($33 million recovery); *Citiline Holdings, Inc. v. iStar Fin. Inc.* ($29 million recovery); *City of Pontiac Gen. Emps. Ret. Sys. v. Lockheed Martin Corp.* ($19.5 million recovery); *Carpenters Pension Tr. Fund of St. Louis v. Barclays PLC* ($14 million recovery); *Beaver Cnty. Emps' Ret. Fund v. Tile Shop Holdings, Inc.* ($9.5 million recovery); *IBEW Loc. 90 Pension Fund v. Deutsche Bank AG* (confidential settlement); *In re Ply Gem Holdings, Inc., Sec. Litig.* ($25.9 million recovery); *In re BRF S.A. Sec. Litig.* ($40 million recovery pending final approval); and *In re SandRidge Energy, Inc. Sec. Litig.* (successfully obtaining class certification in an ongoing litigation). Gilroy also performed an exhaustive factual investigation in *In re Satcon Tech. Corp.*, on behalf of Satcon's Chapter 7 Bankruptcy Trustee, resulting in a seven-figure settlement in an action alleging breaches of fiduciary duties against former Satcon directors and officers.

Education

B.A., City University of New York at Queens College, 2005; J.D., Brooklyn Law School, 2010

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2019-2021; B.A., *Cum Laude*, City University of New York at Queens College, 2005

Jonah H. Goldstein | Of Counsel

Jonah Goldstein is Of Counsel in the Firm's San Diego office and is responsible for prosecuting complex securities cases and obtaining recoveries for investors. He also represents corporate whistleblowers who report violations of the securities laws. Goldstein has achieved significant settlements on behalf of investors including in *In re HealthSouth Sec. Litig.* (over $670 million recovered against HealthSouth, UBS and Ernst & Young), *In re Cisco Sec. Litig.* (approximately $100 million), and *Marcus v. J.C. Penney Company, Inc.* ($97.5 million recovery). Goldstein also served on the Firm's trial team in *In re AT&T Corp. Sec. Litig.*, MDL No. 1399 (D.N.J.), which settled after two weeks of trial for $100 million, and aided in the $65 million recovery in *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.*, the fourth-largest securities recovery ever in the Middle District of Tennessee and one of the largest in more than a decade. Most recently, he was part of the litigation team in *Luna v. Marvell Tech. Grp., Ltd.*, resulting in a $72.5 million settlement that represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors. Before joining the Firm, Goldstein served as a law clerk for the Honorable William H. Erickson on the Colorado Supreme Court and as an Assistant United States Attorney for the Southern District of California, where he tried numerous cases and briefed and argued appeals before the Ninth Circuit Court of Appeals.

Education

B.A., Duke University, 1991; J.D., University of Denver College of Law, 1995

Honors / Awards

Recommended Lawyer, *The Legal 500*, 2018-2019; Comments Editor, *University of Denver Law Review*, University of Denver College of Law

Richard W. Gonnello | Of Counsel

Richard Gonnello is Of Counsel in the Firm's Manhattan office. He has two decades of experience litigating complex securities actions.

Gonnello has successfully represented institutional and individual investors. He has obtained substantial recoveries in numerous securities class actions, including *In re Royal Ahold Sec. Litig.* (D. Md.) ($1.1 billion) and *In re Tremont Sec. Law, State Law & Ins. Litig.* (S.D.N.Y.) ($100 million). Gonnello has also obtained favorable recoveries for institutional investors pursuing direct opt-out claims, including cases against Qwest Communications International, Inc. ($175 million) and Tyco International Ltd ($21 million).

Gonnello has co-authored the following articles appearing in the *New York Law Journal*: "*Staehr* Hikes Burden of Proof to Place Investor on Inquiry Notice" and "Potential Securities Fraud: 'Storm Warnings' Clarified."

Education

B.A., Rutgers University, 1995; J.D., UCLA School of Law, 1998

Honors / Awards

B.A., *Summa Cum Laude*, Rutgers University, 1995

Mitchell D. Gravo | Of Counsel

Mitchell Gravo is Of Counsel to the Firm and is a member of the Firm's institutional investor client services group. With more than 30 years of experience as a practicing attorney, he serves as liaison to the Firm's institutional investor clients throughout the United States and Canada, advising them on securities litigation matters.

Gravo's clients include Anchorage Economic Development Corporation, Anchorage Convention and Visitors Bureau, UST Public Affairs, Inc., International Brotherhood of Electrical Workers, Alaska Seafood International, Distilled Spirits Council of America, RIM Architects, Anchorage Police Department Employees Association, Fred Meyer, and the Automobile Manufacturer's Association. Prior to joining the Firm, he served as an intern with the Municipality of Anchorage, and then served as a law clerk to Superior Court Judge J. Justin Ripley.

Education

B.A., Ohio State University; J.D., University of San Diego School of Law

Bailie L. Heikkinen | Of Counsel

Bailie Heikkinen is Of Counsel in the Firm's Boca Raton office. Her practice focuses on complex class actions, including securities, corporate governance, and consumer fraud litigation.

Heikkinen has been an integral member of the litigation teams responsible for securing monetary recoveries on behalf of shareholders that collectively exceed $100 million. Notable cases include: *Medoff v. CVS Caremark Corp.*, No. 1:09-cv-00554 (D.R.I.); *City of Lakeland Emps. Pension Plan v. Baxter Int'l Inc.*, No. 1:10-cv-06016 (N.D. Ill.); *Wong v. Accretive Health, Inc.*, No. 1:12-cv-03102 (N.D. Ill.); and *Loc. 731 I.B. of T. Excavators & Pavers Pension Tr. Fund v. Swanson*, No. 1:09-cv-00799 (D. Del.).

Education

B.A., University of Florida, 2004; J.D., South Texas College of Law, 2007

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2023-2025; Rising Star, *Super Lawyers Magazine*, 2014, 2018

Dennis J. Herman | Of Counsel

Dennis Herman is Of Counsel in the Firm's San Francisco office where he focuses his practice on securities class actions. He has led or been significantly involved in the prosecution of numerous securities fraud claims that have resulted in substantial recoveries for investors, including settled actions against Massey Energy ($265 million), Coca-Cola ($137 million), VeriSign ($78 million), Psychiatric Solutions, Inc. ($65 million), St. Jude Medical, Inc. ($50 million), NorthWestern ($40 million), BancorpSouth ($29.5 million), America Service Group ($15 million), Specialty Laboratories ($12 million), Stellent ($12 million), and Threshold Pharmaceuticals ($10 million).

Education

B.S., Syracuse University, 1982; J.D., Stanford Law School, 1992

Honors / Awards

Best Lawyer in America, *Best Lawyers*®, 2018-2027; Northern Californa Best Lawyer, *Best Lawyers*®, 2018-2021; Super Lawyer, *Super Lawyers Magazine*, 2017-2018; Order of the Coif, Stanford Law School; Urban A. Sontheimer Award (graduating second in his class), Stanford Law School; Award-winning Investigative Newspaper Reporter and Editor in California and Connecticut

Helen J. Hodges | Of Counsel

Helen Hodges is Of Counsel in the Firm's San Diego office. She specializes in securities fraud litigation. Hodges has been involved in numerous securities class actions, including: *Dynegy*, which was settled for $474 million; *Thurber v. Mattel*, which was settled for $122 million; *Nat'l Health Labs*, which was settled for $64 million; and *Knapp v. Gomez*, Civ. No. 87-0067-H(M) (S.D. Cal.), in which a plaintiffs' verdict was returned in a Rule 10b-5 class action. Additionally, beginning in 2001, Hodges focused on the prosecution of *Enron*, where a record $7.2 billion recovery was obtained for investors.

Education

B.S., Oklahoma State University, 1979; J.D., University of Oklahoma, 1983

Honors / Awards

Rated AV by Martindale-Hubbell; Hall of Fame, Oklahoma State University, 2022; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2022; served on the Oklahoma State University Foundation Board of Trustees, 2013-2021; Philanthropist of the Year, Women for OSU at Oklahoma State University, 2020; Super Lawyer, *Super Lawyers Magazine*, 2007

David J. Hoffa | Of Counsel

David Hoffa is Of Counsel in the Firm's Washington D.C. office. He has served as a liaison to over 110 institutional investors in portfolio monitoring, securities litigation, and claims filing matters. His practice focuses on providing a variety of legal and consulting services to U.S. state and municipal employee retirement systems and single and multi-employer U.S. Taft-Hartley benefit funds. In addition to serving as a leader on the Firm's Israel Institutional Investor Outreach Team, Hoffa also serves as a member of the Firm's lead plaintiff advisory team, and advises public and multi-employer pension funds around the country on issues related to fiduciary responsibility, legislative and regulatory updates, and "best practices" in the corporate governance of publicly traded companies.

Early in his legal career, Hoffa worked for a law firm based in Birmingham, Michigan, where he appeared regularly in Michigan state court in litigation pertaining to business, construction, and employment related matters. Hoffa has also appeared before the Michigan Court of Appeals on several occasions.

Education

B.A., Michigan State University, 1993; J.D., Michigan State University College of Law, 2000

Nancy M. Juda | Of Counsel

Nancy Juda is Of Counsel to the Firm and is based in the Firm's Washington, D.C. office. Her practice focuses on advising Taft-Hartley pension and welfare funds on issues related to corporate fraud in the United States securities markets. Juda's experience as an ERISA attorney provides her with unique insight into the challenges faced by pension fund trustees as they endeavor to protect and preserve their funds' assets.

Prior to joining Robbins Geller, Juda was employed by the United Mine Workers of America Health & Retirement Funds, where she began her practice in the area of employee benefits law. She was also associated with a union-side labor law firm in Washington, D.C., where she represented the trustees of Taft-Hartley pension and welfare funds on qualification, compliance, fiduciary, and transactional issues under ERISA and the Internal Revenue Code.

Using her extensive experience representing employee benefit funds, Juda advises trustees regarding their options for seeking redress for losses due to securities fraud. She currently advises trustees of funds providing benefits for members of unions affiliated with North America's Building Trades of the AFL-CIO. Juda also represents funds in ERISA class actions involving breach of fiduciary claims.

Education

B.A., St. Lawrence University, 1988; J.D., American University, 1992

Francis P. Karam | Of Counsel

Frank Karam is Of Counsel to the Firm and is based in the Firm's Melville office. Karam is a trial lawyer with 30 years of experience. His practice focuses on complex class action litigation involving shareholders' rights and securities fraud. He also represents a number of landowners and royalty owners in litigation against large energy companies. He has tried complex cases involving investment fraud and commercial fraud, both on the plaintiff and defense side, and has argued numerous appeals in state and federal courts. Throughout his career, Karam has tried more than 100 cases to verdict.

Karam has served as a partner at several prominent plaintiffs' securities firms. From 1984 to 1990, Karam was an Assistant District Attorney in the Bronx, New York, where he served as a senior Trial Attorney in the Homicide Bureau. He entered private practice in 1990, concentrating on trial and appellate work in state and federal courts.

Education

A.B., College of the Holy Cross; J.D., Tulane University School of Law

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2019-2026; "Who's Who" for Securities Lawyers, *Corporate Governance Magazine*, 2015

Arthur C. Leahy | Of Counsel

Art Leahy is a founding partner in the Firm's San Diego office and a member of the Firm's Management Committee. He has over 20 years of experience successfully litigating securities actions and derivative cases. Leahy has recovered well over two billion dollars for the Firm's clients and has negotiated comprehensive pro-investor corporate governance reforms at several large public companies. Most recently, Leahy helped secure a $272 million recovery on behalf of mortgage-backed securities investors in *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* In the *Goldman Sachs* case, he helped achieve favorable decisions in the Second Circuit Court of Appeals on behalf of investors of Goldman Sachs mortgage-backed securities and again in the Supreme Court, which denied Goldman Sachs' petition for certiorari, or review, of the Second Circuit's reinstatement of the plaintiff's case. He was also part of the Firm's trial team in the AT&T securities litigation, which AT&T and its former officers paid $100 million to settle after two weeks of trial. Prior to joining the Firm, he served as a judicial extern for the Honorable J. Clifford Wallace of the United States Court of Appeals for the Ninth Circuit, and served as a judicial law clerk for the Honorable Alan C. Kay of the United States District Court for the District of Hawaii.

Education

B.A., Point Loma Nazarene University, 1987; J.D., University of San Diego School of Law, 1990

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Best Lawyer in America, *Best Lawyers*®, 2024-2027; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2022; Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2021; Super Lawyer, *Super Lawyers Magazine*, 2016-2017; J.D., *Cum Laude*, University of San Diego School of Law, 1990; Managing Editor, *San Diego Law Review*, University of San Diego School of Law

Avital O. Malina | Of Counsel

Avital Malina is Of Counsel in the Firm's Melville office, where her practice focuses on complex securities litigation.

Malina has been recognized as a Rising Star by *Super Lawyers Magazine* for the New York Metro area numerous times. Before joining the Firm, she was an associate in the New York office of a large international law firm, where her practice focused on complex commercial litigations.

Education

B.A., Barnard College, 2005, J.D., Fordman University School of Law, 2009

Honors / Awards

Rising Star, *Super Lawyers Magazine*, 2015-2021; B.A., *Magna Cum Laude*, Barnard College, 2005

Jerry E. Martin | Of Counsel

Jerry Martin is Of Counsel in the Firm's Nashville office. He specializes in representing individuals who wish to blow the whistle to expose fraud and abuse committed by federal contractors, health care providers, tax cheats, or those who violate the securities laws. Martin was a member of the litigation team that obtained a $65 million recovery in *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.*, the fourth-largest securities recovery ever in the Middle District of Tennessee and one of the largest in more than a decade.

Before joining the Firm, Martin served as the presidentially appointed United States Attorney for the Middle District of Tennessee from May 2010 to April 2013. As U.S. Attorney, he made prosecuting financial, tax, and health care fraud a top priority. During his tenure, Martin co-chaired the Attorney General's Advisory Committee's Health Care Fraud Working Group. Martin has been recognized as a national leader in combatting fraud and has addressed numerous groups and associations, such as Taxpayers Against Fraud and the National Association of Attorneys General, and was a keynote speaker at the American Bar Association's Annual Health Care Fraud Conference.

Education

B.A., Dartmouth College, 1996; J.D., Stanford University, 1999

Honors / Awards

Super Lawyer, *Super Lawyers Magazine*, 2016-2019

Ruby Menon | Of Counsel

Ruby Menon is Of Counsel to the Firm and is a member of the Firm's legal, advisory, and business development group. She also serves as the liaison to the Firm's many institutional investor clients in the United States and abroad.

Menon began her legal career as an Assistant Prosecuting Attorney, gaining extensive training in trials and litigation. Later, she served as the Chief Legal Counsel to two large multi-employer retirement plans, developing her expertise in many areas of employee benefits and pension administration, including legislative initiatives and regulatory affairs, investments, tax, fiduciary compliance, and plan administration. During her career as Chief Legal Counsel, Menon was a frequent instructor for several certificate and training programs and seminars for pension fund trustees, administrators, and other key decision makers of pension and employee benefits plans. She is a member of various legal and professional organizations in the United States and abroad.

Menon currently serves as a co-chair on the National Association of Public Pension Attorneys Membership Committee and as a board member on the Corporate Advisory Committee of the National Council on Teacher Retirement (NCTR). She has previously served as an advisory board member for the Sovereign Wealth Fund Institute and as a committee member on the International Pension Employee & Benefits Lawyers Association. Menon also organized and participated in the ACAP Shareholder sessions in Singapore and Hong Kong.

Education

B.A., Indiana University, 1985; J.D., Indiana University School of Law, 1988

Honors / Awards

Global Plaintiff Lawyer, *Lawdragon*, 2024-2026

Sara B. Polychron | Of Counsel

Sara Polychron is Of Counsel in the Firm's San Diego office, where her practice focuses on complex securities litigation. She is part of the litigation team prosecuting actions against investment banks and the leading credit rating agencies for their role in the structuring and rating of residential mortgage-backed securities and their subsequent collapse.

Sara earned her Bachelor of Arts degree with honors from the University of Minnesota, where she studied Sociology with an emphasis in Criminology and Law. As an undergraduate she interned with the Hennepin County Attorney's Office, where she advocated for victims of domestic violence and assisted in sentencing negotiations in Juvenile Court. Sara received her Juris Doctor degree from the University of San Diego School of Law, where she was the recipient of two academic scholarships. While in law school, she interned with the Center for Public Interest Law and was a contributing author and assistant editor to the California Regulatory Law Reporter. She also worked as a legal research assistant at the law school and clerked for two San Diego law firms.

Education

B.A., University of Minnesota, 1999; J.D., University of San Diego School of Law, 2005

Svenna Prado | Of Counsel

Svenna Prado is Of Counsel in the Firm's San Diego office, where she focuses on various aspects of international securities and consumer litigation. She was part of the litigation teams that secured settlements against German defendant IKB, as well as Deutsche Bank and Deutsche Bank/West LB for their role in structuring residential mortgage-backed securities and their subsequent collapse. Before joining the Firm, Prado was Head of the Legal Department for a leading international staffing agency in Germany where she focused on all aspects of employment litigation and corporate governance. After she moved to the United States, Prado worked with an internationally oriented German law firm as Counsel to corporate clients establishing subsidiaries in the United States and Germany. As a law student, Prado worked directly for several years for one of the appointed Trustees winding up Eastern German operations under receivership in the aftermath of the German reunification. Utilizing her experience in this area of law, Prado later helped many clients secure successful outcomes in U.S. Bankruptcy Court.

Education

J.D., University of Erlangen-Nuremberg, Germany, 1996; Qualification for Judicial Office, Upper Regional Court Nuremberg, Germany, 1998; New York University, "U.S. Law and Methodologies," 2001

Harini P. Raghupathi | Of Counsel

Harini Raghupathi is Of Counsel in the Firm's San Diego office. She is a member of the Firm's Appellate Practice Group.

Before joining the Firm, Harini represented victims of serious injury in federal and state appellate courts. Her practice areas included mass torts, consumer protection, and civil rights. Additionally, for over a decade, Harini served as a federal public defender specializing in appeals. In that role, she obtained multiple published reversals on behalf of her clients.

In 2012, *The Recorder* named Harini an "Attorney of the Year" for her successful appeal in *United States v. Leal-Del Carmen*, 697 F.3d 964 (9th Cir. 2012). Harini serves as the Chair of the Ninth Circuit Advisory Committee on Rules of Practice. She is also a member of the San Diego Appellate Inn of Court and a volunteer-mentor with The Appellate Project.

Education

B.S., Stanford University, 2004; J.D., University of California, Berkeley School of Law, 2007

Honors / Awards

Attorney of the Year, *The Recorder*, 2012

Andrew T. Rees | Of Counsel

Andrew Rees is Of Counsel in the Firm's Boca Raton office. His practice focuses on complex class actions, including securities, corporate governance and consumer fraud litigation. He was on the litigation team that successfully obtained a $146.25 million recovery in *Nieman v. Duke Energy Corp.*, which is the largest recovery in North Carolina for a case involving securities fraud and one of the five largest recoveries in the Fourth Circuit.

Before joining the Firm, Rees worked as an associate in the Washington, D.C. office of Hogan & Hartson LLP, where he practiced in the area of commercial transactions, including financings, stock purchases, asset acquisitions and mergers.

Education

B.A., Pennsylvania State University, 1997; J.D., William and Mary School of Law, 2002

Honors / Awards

Best Lawyer in America: One to Watch, *Best Lawyers*®, 2024-2025

Jack Reise | Of Counsel

Jack Reise is Of Counsel in the Firm's Boca Raton office. Devoted to protecting the rights of those who have been harmed by corporate misconduct, his practice focuses on class action litigation (including securities fraud, shareholder derivative actions, consumer protection, antitrust, and unfair and deceptive insurance practices). Reise also dedicates a substantial portion of his practice to representing shareholders in actions brought under the federal securities laws. He is currently serving as lead counsel in more than a dozen cases nationwide. Most recently, Reise and a team of Robbins Geller attorneys obtained a $1.21 billion settlement in *In re Valeant Pharms. Int'l, Inc. Sec. Litig.* (D.N.J.), a case that *Vanity Fair* reported as "the corporate scandal of its era" that had raised "fundamental questions about the functioning of our health-care system, the nature of modern markets, and the slippery slope of ethical rationalizations." This is the largest securities class action settlement against a pharmaceutical manufacturer and the ninth largest ever. As lead counsel, Reise has also represented investors in a series of cases involving mutual funds charged with improperly valuating their net assets, which settled for a total of more than $50 million. Other notable actions include: *In re NewPower Holdings, Inc. Sec. Litig.* (S.D.N.Y.) ($41 million settlement); *In re ADT Inc. S'holder Litig.* (Fla. Cir. Ct., 15th Jud. Cir.) ($30 million settlement); *In re Red Hat, Inc. Sec. Litig.* (E.D.N.C.) ($20 million settlement); and *In re AFC Enters., Inc. Sec. Litig.* (N.D. Ga.) ($17.2 million settlement).

Education

B.A., Binghamton University, 1992; J.D., University of Miami School of Law, 1995

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2019-2022; American Jurisprudence Book Award in Contracts; J.D., *Cum Laude*, University of Miami School of Law, 1995; *University of Miami Inter-American Law Review*, University of Miami School of Law

Kevin S. Sciarani | Of Counsel

Kevin Sciarani is Of Counsel to the Firm and his practice focuses on complex securities litigation.

Kevin was a member of the litigation team that obtained a $300 million recovery in *Purple Mountain Trust v. Wells Fargo & Company*, which was reached while the parties were preparing for trial. He was also part of the litigation team in *Karinski v. Stamps.com, Inc.*, which secured a $100 million recovery for investors.

Kevin earned Bachelor of Science and Bachelor of Arts degrees from the University of California, San Diego. He graduated *magna cum laude* from the University of California, Hastings College of the Law with a Juris Doctor degree. During law school, Kevin interned for the U.S. Securities and Exchange Commission and the Antitrust Section of the California Department of Justice. In his final semester, he served as an extern to the Honorable Susan Illston of the United States District Court for the Northern District of California. Kevin also received recognition for his *pro bono* assistance to tenants living in bank-owned foreclosed residential properties due to the subprime mortgage crisis.

Education

B.S., B.A., University of California, San Diego, 2005; J.D., University of California, Hastings College of the Law, 2014

Honors / Awards

J.D., *Magna Cum Laude*, Order of the Coif, University of California, Hastings College of the Law, 2014; CALI Excellence Award, Senior Articles Editor, Hastings Law Journal, University of California, Hastings College of the Law

Leonard B. Simon | Of Counsel

Leonard Simon is Of Counsel in the Firm's San Diego office. His practice has been devoted to litigation in the federal courts, including both the prosecution and the defense of major class actions and other complex litigation in the securities and antitrust fields. Simon has also handled a substantial number of complex appellate matters, arguing cases in the United States Supreme Court, several federal Courts of Appeals, and several California appellate courts. He has also represented large, publicly traded corporations. Simon served as plaintiffs' co-lead counsel in *In re Am. Cont'l Corp./Lincoln Sav. & Loan Sec. Litig.*, MDL No. 834 (D. Ariz.) (settled for $240 million), and *In re NASDAQ Market-Makers Antitrust Litig.*, MDL No. 1023 (S.D.N.Y.) (settled for more than $1 billion). He was also in a leadership role in several of the state court antitrust cases against Microsoft, and the state court antitrust cases challenging electric prices in California. He was centrally involved in the prosecution of *In re Washington Pub. Power Supply Sys. Sec. Litig.*, MDL No. 551 (D. Ariz.), the largest securities class action ever litigated.

Simon is an Adjunct Professor of Law at Duke University, the University of San Diego, and the University of Southern California Law Schools. He has lectured extensively on securities, antitrust, and complex litigation in programs sponsored by the American Bar Association Section of Litigation, the Practicing Law Institute, and ALI-ABA, and at the UCLA Law School, the University of San Diego Law School, and the Stanford Business School. He is an Editor of *California Federal Court Practice* and has authored a law review article on the PSLRA.

Education

B.A., Union College, 1970; J.D., Duke University School of Law, 1973

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2016-2022; Super Lawyer, *Super Lawyers Magazine*, 2008-2016; J.D., Order of the Coif and with Distinction, Duke University School of Law, 1973

Megan M. Sonney | Of Counsel

Megan Sonney is Of Counsel to the Firm and is based in the San Diego office, where her practice focuses on securities fraud litigation.

Most recently, Sonney was a member of the litigation team that obtained a $434 million settlement in *In re Under Armour Sec. Litig*. The case settled just prior to the commencement of trial in Baltimore, Maryland, and represents the second largest securities fraud settlement ever in the Fourth Circuit and is among the top 50 largest such recoveries in U.S. history.

Education

B.A., Point Loma Nazarene University, 2007; J.D., University of San Diego School of Law, 2011

Honors / Awards

B.A., *cum laude*, Point Loma Nazarene University, 2007

Laura S. Stein | Of Counsel

Laura Stein is Of Counsel in the Firm's Philadelphia office. Since 1995, she has practiced in the areas of securities class action litigation, complex litigation, and legislative law. Stein has served as one of the Firm's and the nation's top asset recovery experts with a focus on minimizing losses suffered by shareholders due to corporate fraud and breaches of fiduciary duty. She also seeks to deter future violations of federal and state securities laws by reinforcing the standards of good corporate governance. Stein works with over 500 institutional investors across the nation and abroad, and her clients have served as lead plaintiff in successful cases where billions of dollars were recovered for defrauded investors against such companies as: Alphabet, Apple, AOL Time Warner, TYCO, Cardinal Health, AT&T, Hanover Compressor, 1st Bancorp, Enron, Dynegy, Inc., Honeywell International, Bridgestone, LendingClub, Orbital ATK, Under Armour, and Walmart, to name a few. Many of the cases led by Stein's clients have accomplished groundbreaking corporate governance achievements, including obtaining shareholder-nominated directors. She is a frequent presenter and educator on securities fraud monitoring, litigation, and corporate governance.

Education

B.A., University of Pennsylvania, 1992; J.D., University of Pennsylvania Law School, 1995

Honors / Awards

Leading Plaintiff Financial Lawyer, *Lawdragon*, 2024-2026

John J. Stoia, Jr. | Of Counsel

John Stoia is Of Counsel to the Firm and is based in the Firm's San Diego office. He is one of the founding partners and former managing partner of the Firm. He focuses his practice on insurance fraud, consumer fraud, and securities fraud class actions. Stoia has been responsible for over $10 billion in recoveries on behalf of victims of insurance fraud due to deceptive sales practices such as "vanishing premiums" and "churning." He has worked on dozens of nationwide complex securities class actions, including *In re Am. Cont'l Corp./Lincoln Sav. & Loan Sec. Litig.*, which arose out of the collapse of Lincoln Savings & Loan and Charles Keating's empire. Stoia was a member of the plaintiffs' trial team that obtained verdicts against Keating and his co-defendants in excess of $3 billion and settlements of over $240 million.

He also represented numerous large institutional investors who suffered hundreds of millions of dollars in losses as a result of major financial scandals, including AOL Time Warner and WorldCom. Currently, Stoia is lead counsel in numerous cases against online discount voucher companies for violations of both federal and state laws including violation of state gift card statutes.

Education

B.S., University of Tulsa, 1983; J.D., University of Tulsa, 1986; LL.M., Georgetown University Law Center, 1987

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2022; Super Lawyer, *Super Lawyers Magazine*, 2007-2017; Litigator of the Month, *The National Law Journal*, July 2000; LL.M. Top of Class, Georgetown University Law Center

David C. Walton | Of Counsel

David Walton was a founding partner of the Firm. For over 25 years, he has prosecuted class actions and private actions on behalf of defrauded investors, particularly in the area of accounting fraud. He has investigated and participated in the litigation of highly complex accounting scandals within some of America's largest corporations, including Enron ($7.2 billion), HealthSouth ($671 million), WorldCom ($657 million), AOL Time Warner ($629 million), Countrywide ($500 million), and Dynegy ($474 million), as well as numerous companies implicated in stock option backdating.

Walton is a member of the Bar of California, a Certified Public Accountant (California 1992), and is fluent in Spanish. In 2003-2004, he served as a member of the California Board of Accountancy, which is responsible for regulating the accounting profession in California.

Education

B.A., University of Utah, 1988; J.D., University of Southern California Law Center, 1993

Honors / Awards

Recommended Lawyer, *The Legal 500*, 2019; Super Lawyer, *Super Lawyers Magazine*, 2015-2016; California Board of Accountancy, Member, 2003-2004; *Southern California Law Review*, Member, University of Southern California Law Center; Hale Moot Court Honors Program, University of Southern California Law Center

Bruce Gamble | Special Counsel

Bruce Gamble is Special Counsel to the Firm in the Firm's Washington D.C. office and is a member of the Firm's institutional investor client services group. He serves as liaison with the Firm's institutional investor clients in the United States and abroad, advising them on securities litigation matters. Gamble formerly served as Of Counsel to the Firm, providing a broad array of highly specialized legal and consulting services to public retirement plans. Before working with Robbins Geller, Gamble was General Counsel and Chief Compliance Officer for the District of Columbia Retirement Board, where he served as chief legal advisor to the Board of Trustees and staff. Gamble's experience also includes serving as Chief Executive Officer of two national trade associations and several senior level staff positions on Capitol Hill.

Education

B.S., University of Louisville, 1979; J.D., Georgetown University Law Center, 1989

Honors / Awards

Executive Board Member, National Association of Public Pension Attorneys, 2000-2006; American Banker selection as one of the most promising U.S. bank executives under 40 years of age, 1992

R. Steven Aronica | Forensic Accountant

Steven Aronica is a Certified Public Accountant licensed in the States of New York and Georgia and is a member of the American Institute of Certified Public Accountants, the Institute of Internal Auditors, and the Association of Certified Fraud Examiners. Aronica has been instrumental in the prosecution of numerous financial and accounting fraud civil litigation claims against companies that include Lucent Technologies, Tyco, Oxford Health Plans, Computer Associates, Aetna, WorldCom, Vivendi, AOL Time Warner, Ikon, Doral Financial, First BanCorp, Acclaim Entertainment, Pall Corporation, iStar Financial, Hibernia Foods, NBTY, Tommy Hilfiger, Lockheed Martin, the Blackstone Group, and Motorola. In addition, he assisted in the prosecution of numerous civil claims against the major United States public accounting firms.

Aronica has been employed in the practice of financial accounting for more than 30 years, including public accounting, where he was responsible for providing clients with a wide range of accounting and auditing services; the investment bank Drexel Burnham Lambert, Inc., where he held positions with accounting and financial reporting responsibilities; and at the SEC, where he held various positions in the divisions of Corporation Finance and Enforcement and participated in the prosecution of both criminal and civil fraud claims.

Education

B.B.A., University of Georgia, 1979

Andrew J. Rudolph | Forensic Accountant

Andrew Rudolph is the Director of the Firm's Forensic Accounting Department, which provides in-house forensic accounting expertise in connection with securities fraud litigation against national and foreign companies. He has directed hundreds of financial statement fraud investigations, which were instrumental in recovering billions of dollars for defrauded investors. Prominent cases include *Qwest*, *HealthSouth*, *WorldCom*, *Boeing*, *Honeywell*, *Vivendi*, *Aurora Foods*, *Informix*, *Platinum Software*, *AOL Time Warner*, and *UnitedHealth*.

Rudolph is a Certified Fraud Examiner and a Certified Public Accountant licensed to practice in California. He is an active member of the American Institute of Certified Public Accountants, California's Society of Certified Public Accountants, and the Association of Certified Fraud Examiners. His 20 years of public accounting, consulting, and forensic accounting experience includes financial fraud investigation, auditor malpractice, auditing of public and private companies, business litigation consulting, due diligence investigations, and taxation.

Education

B.A., Central Connecticut State University, 1985

Christopher Yurcek | Forensic Accountant

Christopher Yurcek is the Assistant Director of the Firm's Forensic Accounting Department, which provides in-house forensic accounting and litigation expertise in connection with major securities fraud litigation. He has directed the Firm's forensic accounting efforts on numerous high-profile cases, including *In re Enron Corp. Sec. Litig.* and *Jaffe v. Household Int'l, Inc.*, which obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Other prominent cases include *HealthSouth*, *UnitedHealth*, *Vesta*, *Informix*, *Mattel*, *Coca-Cola*, and *Media Vision*.

Yurcek has over 20 years of accounting, auditing, and consulting experience in areas including financial statement audit, forensic accounting and fraud investigation, auditor malpractice, turn-around consulting, business litigation, and business valuation. He is a Certified Public Accountant licensed in California, holds a Certified in Financial Forensics (CFF) Credential from the American Institute of Certified Public Accountants, and is a member of the California Society of CPAs and the Association of Certified Fraud Examiners.

Education

B.A., University of California, Santa Barbara, 1985

Exhibit 8

Compendium of Unreported Cases

In re Alphabet Inc. Sec. Litig.,
No. 18-cv-06245, slip op. (N.D. Cal. Sept. 30, 2024) 1

In re Clarent Corp. Sec. Litig.,
No. C-01-3361 CRB, slip op. (N.D. Cal. Feb. 16, 2005) 2

In re Hewlett-Packard Co. Sec. Litig.,
No. SACV 11-1404, slip op. (C.D. Cal. Sept. 15, 2014).....3

In re Intuitive Surgical Sec. Litig.,
No. 5:13-cv-01920, slip op. (N.D. Cal. Dec. 20, 2018) 4

In re JDS Uniphase Sec. Litig.,
No. C-02-1486 CW (EDL), slip op. (N.D. Cal. Nov. 27, 2007) 5

In re Tesla, Inc. Sec. Litig.,
No. C-18-04865, slip op. (N.D. Cal. Feb. 3, 2023) 6

In re Twitter Inc. Sec. Litig.,
No. 4:16-cv-05314, ECF No. 670, slip op, (N.D. Cal. Nov. 21, 2022) 7

TAB 1

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

In re ALPHABET, INC. SECURITIES LITIGATION.

Case No. 18-cv-06245-TLT

ORDER GRANTING MOTION FOR FINAL APPROVAL OF SETTLEMENT; GRANTING MOTION FOR ATTORNEY FEES, COSTS, REALLOCATION OF REMAINDER AND DE MINIMUS DONATION

Re: Dkt. Nos. 233, 234

The Court previously granted a motion for preliminary approval of a Class Action Settlement between Lead Plaintiff State of Rhode Island, Office of the Rhode Island Treasurer, on behalf of the Employees' Retirement System of Rhode Island, individually and on behalf of all others similarly situated, and Defendants Alphabet, Inc. et. al., on April 2, 2024 and April 9, 2024. ECF 228; ECF 232. As directed by the Court's preliminary approval orders, Plaintiffs filed their motion for attorneys' fees and costs. ECF 234.

In their Final Settlement, Plaintiffs submitted a declaration indicating that there were 58 timely opt out members and two untimely opt out members. ECF 238, Declaration of Ross D. Murray ¶ 6. There were no objectors to the final settlement, but three objectors to the attorneys' fee award. Id. ¶ 7. The Court held a hearing and took arguments from the parties on September 24, 2024. ECF 241.

Having considered the motion briefing, the terms of the Settlement Agreement, the objections and response thereto, the arguments of counsel, and the other matters on file in this action, the Court **GRANTS** the motion for final approval.

The Court finds the settlement fair, adequate, and reasonable. The provisional

appointments of the class representative and class counsel are confirmed.

The Motion for Attorney Fees and Expenses is **GRANTED**. The Court **ORDERS** that class counsel shall be paid $66,500,000 (19% of the Settlement Amount) in attorneys' fees; and $1,540,059.57 in litigation costs.

I. BACKGROUND

A. Procedural History

Plaintiff Adam Wicks initiated this securities class action and filed a complaint against defendants Alphabet, Lawrence E. Page, Sundar Pichai, and Ruth Porat on October 11, 2018 ("Wicks Action"). Compl., ECF 1. On October 12, 2018, the case was assigned to Judge Jeffrey S. White. ECF 3. On November 19, 2018, *El Mawardy v. Alphabet, Inc., et al*., No. 18-cv-5704, ("El Mawardy Action") was transferred to this Court from the U.S. District Court for the Eastern District of New York. ECF 15, at 2 n.1.

On December 10, 2018, Plaintiffs the Retirement System, Adam Wick, Theodoros Vaskopulos, Richard R. Costa UDT ("Costa"), and Ironworkers Locals 40,361 & 417 Union Security Funds (the "Ironworkers") each separately moved for consolidation of the actions, appointment as lead plaintiff, and approval of lead Counsel. ECFs. 15, 18, 25, 42. Plaintiff Vaskopulos withdrew his motion on December 14, 2018. ECF 33. On December 18, 2018, Plaintiff Wicks filed a joint administrative motion for consideration of whether the El Mawardy Action was related to the Wicks Action. ECF 34. The motion was granted on December 20, 2018. ECF 36. On December 24, 2018, Plaintiff the Retirement System filed an opposition to the motions for consolidation of related actions, appointment as Lead Plaintiff, and approval as Lead Counsel against Plaintiffs Ironworkers and Costa. ECF 39. On December 31, 2018, Plaintiff the Retirement System filed a notice of unopposed motion. ECF 40.

On January 7, 2019, Judge White granted Plaintiff the Retirement System's motion for consolidation of related actions and captioned the action "In re ALPHABET, INC. SECURITIES LITIGATION."[1] ECF 44. The Court also appointed the Retirement system as Lead Plaintiff and

[1]Judge White consolidated *Wicks v. Alphabet, Inc.*, No. 18-cv-06245 (filed Oct. 11, 2018); and *El Mawardy v. Alphabet, Inc.*, No. 18-cv-07018 (transferred to this District on Nov. 1, 2018).

appointed Robbins Geller Rudman & Dowd LLP as Lead Counsel. *Id.* at 2 (first citing 15 U.S.C. § 78u4(a)(3)(B); and then citing 15 U.S.C. §78u-4(a)(3)(B)(v)). On January 25, 2019, Plaintiff Bao filed an administrative motion to consider whether cases should be related. ECF 45. The motion was granted, and the cases were related on February 6, 2019.[2] ECF 46.

On April 26, 2019, Plaintiffs filed their consolidated amended class action complaint against defendants Alphabet, Page, Pichai, Google, Enright, and Walker. ECF 62. On April 30, 2019, plaintiffs Ian Green, Leo Shumacher, Steve Stims and Joseph Lipovich, and Scott Galbiati filed a motion for administrative relief to consider whether their cases were related or for consideration of a sua sponte judicial referral for purpose of determining relationship. ECF 65; Civ. L.R. 3-12. On May 13, 2019, the cases were related to the Wicks Action. ECF 66. On June 21, 2022, Plaintiffs moved to certify class, appoint a class representative, and appoint class counsel. ECF 102. On September 8, 2022, Plaintiffs filed a motion for leave to file a supplement to their consolidated amended complaint. ECF 136. The motion for leave was granted and the motion to certify the class was stricken. ECF 153. Plaintiffs filed a supplement to their consolidated amended complaint on February 28, 2023. ECF 154. Plaintiffs refiled their motion to certify class on May 2, 2023. ECF 165. Defendants filed an opposition to the motion on June 30, 2023. ECF 181.

On July 24, 2023, Judge White recused himself from this matter. ECF 188. The case was reassigned to the Court on July 25, 2023. ECF 189. The Court ordered Lead Plaintiff to re-notice the motion to certify the class on July 31, 2023. ECF 192. Lead Plaintiff filed a notice of conditional withdrawal of the motion for class certification without prejudice on July 31, 2023. ECF 193. On the same day, Defendants responded with a request to finish briefing the class certification motion. ECF 194. The Court held a case management conference and published a case management scheduling order on August 1, 2023. ECF 196. The Court set the hearing on the motion to certify class for October 24, 2023. *Id.* Lead Plaintiff filed a reply for the motion to

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ECF 44. The Wicks Action serves as the master filed for every action in the consolidated action. *Id.* at 1.

[2]The Court related, *Bao v. Page*, No. 19-cv-00314, and *Cordeiro v. Page*, No. 19-cv-00447 to the instant case. ECF 46.

certify class on August 14, 2023. ECF 198.[3]

On October 20, 2023, the Class Certification hearing set for October 24, 2023, was vacated at the request of counsel and reset for March 5, 2024. ECF 218.

On February 4, 2024, the parties reached a settlement prior to class certification with the assistance of an experienced mediator at arm's-length under the supervision of the Hon. Layn R. Phillips (Ret.) of Phillips ADR ("Judge Phillips").

On April 2, 2024, the Court granted preliminary approval of the class action settlement, but requested additional information, including information on objections, exclusions, deadlines for notice, and questions for the final hearing. ECF 228. On April 9, 2024, the Court again granted the preliminarily approval of the class action settlement and provided for notice. ECF 232.

On July 19, 2024, Lead Plaintiff filed this settlement for final approval and approval of plan of allocation. ECF 233. It also filed a motion for attorney fees and expenses. ECF 234. Defendants filed a response and reply. ECF 237; 239. Lead Plaintiff filed its reply. ECF 238.

The Settlement Class is described as follows: "all Persons that purchased or otherwise acquired Alphabet Class A and/or Class C stock during the period from April 23, 2018, through April 30, 2019, inclusive. Excluded from the Settlement Class are Defendants and their families, the officers, directors, and affiliated of Defendants, at all relevant times, members of their immediate families and their legal representatives, heirs, successors, or assigns, and any entity in which Defendants have or had a controlling interest. Also excluded from the Settlement Class is any Person who timely and validly sought exclusion from the Settlement Class." ECF 239.

B. Terms of the Settlement Agreement

Under the terms of the Settlement Agreement, defendant will pay $350,000,000.00 into a common settlement fund, without admitting liability. This amount includes attorneys' fees and costs and the cost of class notice and settlement administration.

i. Attorneys' Fees and Costs

[3]On October 4, 2023, the Court granted a motion for leave for Joseph A. Grundfest to file a brief as amicus curae. ECF 216. However, the Court rescinded the order on October 5, 2023, as the filing was untimely and did not comply with Civil Local Rule 7-3(d). *Id.* The Court did not consider the supplemental brief in consideration of the instant motion.

Under the Settlement Agreement, Plaintiff's counsel, Robbins Geller Rudman & Dowd LLP, agreed to seek an award of attorneys' fees not to exceed 19% of the Settlement Amount, $66,500,000.00, and no more than $1,540,059.57,[4] in litigation costs. ECF 234, at 3.

ii. Class Relief

After deductions from the common fund for fees and costs, approximately $289,300,000 will remain to be distributed among the participating class members. Class members will be paid according to the calculations described in ECF 222 under Calculation of Recognized Loss Amounts. ECF 222, Ex. A-1.

iii. Remainder

The Settlement Agreement provides that "[i]f there is any balance remaining in the Net Settlement Fund after a reasonable amount of time following the date of the initial distribution of the Net Settlement Fund, Lead Counsel shall, if feasible, reallocate such balance among Authorized Claimants who negotiated the checks sent to them in the initial distribution and who would receive at least $10.00 in an equitable and economical fashion." ECF 222, Ex. 1, at 21. "These reallocations shall be repeated until the balance remaining in the Net Settlement Fund is *de minimis* and such remaining balance shall then be donated to the Investor Protection Trust." *Id.*

C. Class Notice and Claims Administration

The Settlement Agreement is being administered by Gilardi & Co. LLC ("Gilardi"). Following the Court's preliminary approval and conditional certification of the settlement, Gilardi, the Class Administrator, mailed or emailed more than 1.2 million copies of the Summary Notice to potential Settlement Class Members and nominees. ECF 236, Murray Decl. ¶ 11. The Summary Notice was also published in *The Wall Street Journal* and transmitted over *Business Wire*, and the website created for the Settlement (www.AlphabetSecuritiesSettlement.com) contains the Stipulation, Notice, Proof of Claim, and Preliminary Approval Order. *Id.* ¶ 12; ECF 233, at 7-8. If mail was returned as undeliverable for which new addresses were identified, they were re-mailed to those new addresses. ECF 236, Murray Decl. ¶ 4.

[4]This amount is lower than the $1,750,000 provided in the Notice. ECF 234, at 16.

Class members were given until August 23, 2024 to object or exclude themselves from the Settlement Agreement. ECF 236, Murray Decl. ¶ 2. Since the Initial Mailing Declaration, 58 persons filed timely requests to opt out of the Settlement Class. *Id.* ¶ 6. Two persons filed late requests. *Id.* The 58 opt-out members represent a total of 5,983 shares while the two untimely opt-out members represent a total of 37 shares out of an estimated 113,850,000 damaged shares. ECF 238-1, at 2. The opt-out members' shares represent 0.005% of the total shares. *Id.*

II. FINAL APPROVAL OF SETTLEMENT

A. Legal Standard

A court may approve a proposed class action settlement of a certified class only "after a hearing and on finding that it is fair, reasonable, and adequate," and that it meets the requirements for class certification. Fed. R. Civ. P. 23(e)(2). In reviewing the proposed settlement, a court need not address whether the settlement is ideal or the best outcome, but only whether the settlement is fair, free of collusion, and consistent with plaintiff's fiduciary obligations to the class. *Hanlon v. Chrysler Corp.*, 150 F.3d at 1027. The *Hanlon* court identified the following factors relevant to assessing a settlement proposal: (1) the strength of the plaintiff's case; (2) the risk, expense, complexity, and likely duration of further litigation; (3) the risk of maintaining class action status throughout the trial; (4) the amount offered in settlement; (5) the extent of discovery completed and the stage of the proceeding; (6) the experience and views of counsel; (7) the presence of a government participant; and (8) the reaction of class members to the proposed settlement. *Id.* at 1026 (citation omitted); *Churchill Vill., L.L.C. v. Gen. Elec.*, 361 F.3d 566, 575 (9th Cir. 2004).

Settlements that occur before formal class certification also "require a higher standard of fairness." *In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 458 (9th Cir. 2000). In reviewing such settlements, in addition to considering the above factors, a court also must ensure that "the settlement is not the product of collusion among the negotiating parties." *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 946-47 (9th Cir. 2011).

B. Analysis

i. The Settlement Class Meets the Prerequisites for Certification

As the Court found in its order granting preliminary approval and conditional certification

of the settlement class herein, the prerequisites of Rule 23 have been satisfied purposes of certification of the Settlement Class. ECF 228.

ii. Adequacy of Notice

A court must "direct notice [of a proposed class settlement] in a reasonable manner to all class members who would be bound by the proposal." Fed. R. Civ. P. 23(e)(1). "The class must be notified of a proposed settlement in a manner that does not systematically leave any group without notice." *Officers for Justice v. Civil Serv. Comm'n*, 688 F.2d 615, 624 (9th Cir. 1982). Adequate notice requires: (i) the best notice practicable; (ii) reasonably calculated, under the circumstances, to apprise the Class members of the proposed settlement and of their right to object or to exclude themselves as provided in the settlement agreement; (iii) reasonable and constitute due, adequate, and sufficient notice to all persons entitled to receive notice; and (iv) meet all applicable requirements of due process and any other applicable requirements under federal law. *Phillips Petroleum Co. v. Shutts*, 472 U.S. 797, 812 (1985). Due process requires "notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 314 (1950).

The Court found the parties' proposed notice procedures provided the best notice practicable and reasonably calculated to apprise Class Members of the settlement and their rights to object or exclude themselves. Pursuant to those procedures, more than 1.2 million copies of the Summary Notice were mailed or emailed to potential Settlement Class Members and nominees; the Summary Notice was also published in *The Wall Street Journal* and transmitted over *Business Wire*; and the website created for the Settlement (www.AlphabetSecuritiesSettlement.com) contains the Stipulation, Notice, Proof of Claim, and Preliminary Approval Order. ECF 233, at 7-8. The Claims Administrator also mailed or emailed 254 Claim Packages to potential Settlement Class Members and nominees, resulting in 948,245 asserted claims. ECF 238, at 1.

Based upon the foregoing, the Court finds that the Settlement Class has been provided adequate notice.

iii. The Settlement is Fair and Reasonable

As the Court previously found in its order granting preliminary approval, the *Hanlon* factors indicate the settlement here is fair and reasonable and treats class members equitably relative to one another. *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1026 (9th Cir. 1998); ECF 232.

The reaction of the class was mostly positive. The Court received 3 objections, 58 timely exclusions, and two untimely exclusions as of the August 23, 2024 deadline. The objections and exclusions constitute 0.005% of the total damaged shares. ECF 238-1, at 2. "[T]he absence of a large number of objections to a proposed class action settlement raises a strong presumption that the terms of a proposed class settlement action are favorable to the class members." *In re Omnivision Techs., Inc.*, 559 F.Supp.2d 1036, 1043 (N.D. Cal. 2008) (citation omitted); *see also Churchill Vill.*, 361 F.3d at 577 (holding that approval of a settlement that received 45 objections (0.05%) and 500 opt-outs (0.56%) out of 90,000 class members was proper).

In its preliminary approval order, the Court approved the proposed plan of allocation. ECF 232. That plan is: Class members are bound by the determinations and judgments in this Action unless they timely request to be excluded or "opt out" from the Settlement Class no later than August 23, 2024. *Id.* ¶ 19. The Court should find the plan of allocation to be fair and reasonable and that it treats class members equitably and it should approve that plan of allocation. *Id.*

iv. Objections

Three individuals submitted objections: Faris Sabri Azzouni; Richard A. Hauser; Larry D. Killion. ECF 238, Ex. A. The Court has considered all objections and overrules them for the reasons stated on the record at oral argument, and as further explained below. The Court addresses each objector's arguments in turn.

Objector Azzouni filed an objection indicating that Class C shareholder pay would drop from $2.85 per share to $0.56 if the Court were to grant the request attorneys' fee award. ECF 238, Ex. A. Plaintiff responds that these numbers are incorrect because $0.56 represents the estimated cost per share, not the price per share. Accordingly, because Azzouni's understanding of the numbers is incorrect, the Court overrules this objection.

Objector Hauser submitted a boilerplate objection stating that the fee is disproportionate to the work necessary to this settlement. ECF 238, Ex. A. Hauser, however, does not suggest what

would be an "appropriate amount" of fees. *Id.* The Court therefore overrules this objection as well.

Finally, objector Killion objected to the Plaintiffs' attorneys use of a contingency fee and argued that counsel should "base their fee on defendable court approved reasonable time and hourly rates actually spent on the case." ECF 238, Ex. A. Because the Court can determine that the attorney fee award is fair, reasonable, and based on both the percentage-of-recovery method and the lodestar method, as analyzed below, the Court overrules this last objection. *See* Section III.

v. Certification is Granted and Settlement is Approved

After reviewing all the required factors, the Court finds the Settlement Agreement to be fair, reasonable, and adequate, and certification of the Settlement Class as defined therein to be proper. The remainder recipient, Investor Protection Trust, is **APPROVED**.

III. MOTION FOR ATTORNEYS' FEES, COSTS, AND EXPENSES

A. Attorneys' Fee Award

Attorneys' fees and costs may be awarded in a certified class action under Federal Rule of Civil Procedure 23(h). Such fees must be found "fair, reasonable, and adequate" to be approved. Fed. R. Civ. P. 23(e); *Staton v. Boeing Co.*, 327 F.3d 938, 963 (9th Cir. 2003). To "avoid abdicating its responsibility to review the agreement for the protection of the class, a district court must carefully assess the reasonableness of a fee amount spelled out in a class action settlement agreement." *Id.* at 963. "[T]he members of the class retain an interest in assuring that the fees to be paid class counsel are not unreasonably high," since unreasonably high fees are a likely indicator that the class has obtained less monetary or injunctive relief than they might otherwise. *Id.* at 964.

The Court analyzes an attorneys' fee request based on either a percentage of the total settlement fund made available to the class, including costs, fees, and injunctive relief, or the "lodestar" method. *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1047 (9th Cir. 2002). The Ninth Circuit encourages courts to use another method as a cross-check to avoid a "mechanical or formulaic approach that results in an unreasonable reward." *In re Bluetooth*, 654 F.3d at 944–45

(citing *Vizcaino,* 290 F.3d at 1050–51).

i. Percentage-of-Recovery Method

When using the percentage-of-recovery method, courts consider a number of factors, including whether class counsel " 'achieved exceptional results for the class,' whether the case was risky for class counsel, whether counsel's performance 'generated benefits beyond the cash settlement fund,' the market rate for the particular field of law (in some circumstances), the burdens class counsel experienced while litigating the case (e.g., cost, duration, foregoing other work), and whether the case was handled on a contingency basis." *In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934, 954-55 (9th Cir. 2015) (quoting *Vizcaino*, 290 F.3d at 1047-50. "[T]he most critical factor [in determining appropriate attorney's fee awards] is the degree of success obtained." *Hensley v. Eckerhart*, 461 U.S. 424, 436 (1983).

Under the percentage-of-the-fund method, courts in the Ninth Circuit "typically calculate 25% of the fund as the 'benchmark' for a reasonable fee award, providing adequate explanation in the record of any 'special circumstances' justifying a departure." *In re Bluetooth*, 654 F.3d at 942 (citing *Six (6) Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301, 1311 (9th Cir. 1990)). The benchmark should be adjusted when the percentage recovery would be "either too small or too large in light of the hours devoted to the case or other relevant factors." *Six (6) Mexican Workers*, 904 F.2d at 1311.

Class counsel here requests an attorneys' fee award of $66,500,000. Applying the percentage of recovery method, the parties determined the total settlement value to be $350,000,000. The attorneys' fees requested would come to 19% of this total. This amount is below the 25% benchmark. Given the size of this settlement, and that it occurred before class certification, the Court must give additional scrutiny to the attorneys' fee request. First, the Court looks at the results achieved. Plaintiffs' counsel achieved a settlement of 25% of the stretch damages, significantly higher than the median securities class action recovery of damages. *See* LAARNI T. BULAN & LAURA E. SIMMONS, SECURITIES CLASS ACTION SETTLEMENTS: 2023 REVIEW AND ANALYSIS 7 (Cornerstone Research 2024) (providing research on median settlements as a percentage of damages and finding that the median recovery is at most around 8%); *Hefler v.*

Wells Fargo & Co., N0. 16-cv-05479-JST, 2018 WL 6619983, at *8 (N.D. Cal. Dec. 18, 2018) (finding the median recoveries in securities fraud class actions was 2.5 percent between 2008 and 2016 and 3 percent in 2017); ECF 234, at 7. Lead Counsel alleges that Plaintiffs' counsel achieved an outstanding result for the Settlement Class. *Id.* at 8. Indeed, Plaintiffs achieved the largest privacy and cybersecurity-related securities class action lawsuit settlement in this district.[5]

Next, this case was risky because it contained a complex issue that resulted in six years of litigation. *See In re Facebook, Inc., IPO Sec. & Derivative Litig.*, 343 F. Supp. 3d 394, 416 (S.D.N.Y. 2018) (finding that "securities actions are highly complex" and that "securities class litigation is notably difficult and notoriously uncertain"). Plaintiffs' counsel put in over 20,000 hours into the settlement, which involved an appeal before the Ninth Circuit. Furthermore, Plaintiffs' counsel handled the case on a contingency fee basis and has received no compensation thus far, which weighs in favor of granting higher attorney fees. *See Vizcaino*, 290 F.3d at 1050 (holding that representing class counsel on a contingency fee basis required counsel to forgo other work and resulted in a decline of the firm's annual income).

Additionally, an award of 19% is below the typical 25% benchmark in the Northern District of California. *In re Wells Fargo & Co. Shareholder Derivative Litigation*, 445 F. Supp. 3d 508, 525 (N.D. Cal. 2020). It is also lower than the traditional mean and median fee awards in this district. *Rodman v. Safeway Inc.*, No. 11-cv-03003-JST, 2018 WL 4030558, at * (N.D. Cal. Aug. 23, 2018) (providing a chart graphing attorneys' fees from 2009 to 2013 that begins at 22% and ends at 32%, and then providing that between 2006 and 2007 the mean attorney fee award for a high recovery settlement was 18.4% and the median was 19%). In one outlier case, a court in this district awarded class counsel a 13.5% attorneys' fee, but this award was at the counsel's request due to low recovery in the action. *In re LDK Solar Securities Litigation*, No. C 07-5182-WHA, 2010 WL 3001384, at *4 (N.D. Cal. July 29, 2010).

Although Lead Counsel in the present case requests $66,500,000, this request is similar to

[5] *Google Parent Alphabet Agrees to Pay Shareholders $350 Million Over Data Leak*, ISS INSIGHTS (March 12, 2024), https://insights.issgovernance.com/posts/google-parent-alphabet-agrees-to-pay-shareholders-350-million-over-data-leak/.

the $52,800,000 attorneys' fee award in *Wells Fargo*, which came to 22% of the total settlement. *In re Wells Fargo*, 445 F. Supp. 3d at 526. Accordingly, after careful analysis of attorney fee trends and similar cases, the Court finds that a fee award of 19% is fair, reasonable, and adequate.

ii. Lodestar Cross-Check

Under the lodestar approach, a court multiplies the number of hours reasonably expended by the reasonable hourly rate. *Kelly v. Wengler*, 822 F.3d 1085, 1099 (9th Cir. 2016) ("[A] court calculates the lodestar figure by multiplying the number of hours reasonably expended on a case by a reasonable hourly rate. A reasonable hourly rate is ordinarily the 'prevailing market rate [] in the relevant community.'").

The Court has considered a cross-check using the lodestar method. Here, the lodestar multiplier is approximately 4.58, which the Court finds reasonable. *See In re Facebook Biometric Info. Priv. Litig.*, 522 F. Supp. 3d 617, 633 (N.D. Cal. 2021) (approving a fee award with a lodestar multiplier of 4.71); ECF 234, at 14. Plaintiffs' attorneys worked 23,026.30 hours at rates ranging from $110 per hour to $1400 per hour for a total of $14,514,240.00. ECF 234, Ex. A. The Court finds that the hours claimed were reasonably incurred and that the rates charged are reasonable and commensurate with those charged by attorneys with similar experience in the market. *See Fleming v. Impax Lab'ys Inc.*, 2022 WL 2789496, at *9 (N.D. Cal. July 15, 2022) (approving hourly rates between $760 and $1,325 for partners and $175 and $520 for associates). The Court also finds that Class Counsel represented their clients with skill and diligence and obtained an excellent result for the class, taking into account the possible outcomes and risks of proceeding trial.

iii. Objections

Defendants do not oppose the fee request, although three individual objectors do. These objectors challenge the fee amount because they argue not much will be left to shareholders. For instance, the first objector believes that the Lead Counsel is concerned that Class C shareholder pay will drop from $2.85 per share to $0.56. ECF 238, Ex. A, at 1. This objector, however, confused these number: $2.85 per share is the estimated recovery number while $0.56 is the cost of expenses that will be subtracted from the $2.85. The total estimated cost per Class C share

remains $0.56. The second objector submitted a boilerplate objection arguing that a fee of 19% is excessive. *Id.* at 27. The third objector objects to contingency payment structures, arguing that counsel should base their fees on their time and hourly rates rather than the contingency fee agreement. *Id.* at 30. The Court takes these objectors' concerns into consideration, but determines that the attorneys' fee award is fair, reasonable, and adequate based on the foregoing.

Accordingly, the Court finds an award of attorneys' fees in the amount of $66,500,000 to be fair, reasonable, and adequate.

B. Costs Award

Class counsel is entitled to reimbursement of reasonable out-of-pocket expenses. Fed. R. Civ. P. 23(h); *see Harris v. Marhoefer*, 24 F.3d 16, 19 (9th Cir. 1994) (holding that attorneys may recover reasonable expenses that would typically be billed to paying clients in non-contingency matters). Costs compensable under Rule 23(h) include "nontaxable costs that are authorized by law or by the parties' agreement." Fed. R. Civ. P. 23(h). Here, class counsel seeks reimbursement for litigation expenses, and provides records documenting those expenses, in the amount of $1,540,059.57. The Court finds this cost amount reasonable, fair, and adequate.

IV. CONCLUSION

Based upon the foregoing, the motion for final approval of class settlement is **GRANTED**. The motion for attorneys' fees and costs is **GRANTED** as follows: Class Counsel is awarded $66,500,000 in attorneys' fees and $1,540,059.57 in litigation costs.

After deductions from the common fund for fees and costs, approximately $289,300,000 shall remain to be distributed among the participating class members. Class members shall be paid according to the calculations described in ECF 222 under Calculation of Recognized Loss Amounts.

With respect to residuals, the Net Settlement Fund and Lead Counsel shall reallocate such balance among Authorized Claimants who negotiated the checks sent to them in the initial distribution and who would receive at least $10.00 in an equitable and economical fashion.

These reallocations shall be repeated until the balance remaining in the Net Settlement Fund is *de minimis* and such remaining balance shall then be donated to the Investor Protection

Trust.

Without affecting the finality of this order in any way, the Court retains jurisdiction of all matters relating to the interpretation, administration, implementation, effectuation and enforcement of this order and the Settlement.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that final judgment is **ENTERED** in accordance with the terms of the Settlement, the Order Granting Preliminary Approval of Class Action Settlement filed on February 5, 2024 (ECF 222), and this order.

This document will constitute a final judgment (and a separate document constituting the judgment) for purposes of Rule 58, Federal Rules of Civil Procedure.

The parties shall file a post-distribution accounting in accordance with this District's Procedural Guidance for Class Action Settlements no later than April 10, 2025. The Court **SETS** a compliance deadline on May 6, 2025, on the Court's 2:00 pm. calendar, to verify timely filing of the post-distribution accounting.

This order terminates Docket Nos. 233 and 234.

IT IS SO ORDERED.

Dated: September 30, 2024

TRINA L. THOMPSON
United States District Judge

TAB 2

United States District Court
For the Northern District of California

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re CLARENT CORPORATION SECURITIES LITIGATION

No. C 01-03361 CRB

/

VERDICT FORM AS TO JERRY CHANG'S LIABILITY

United States District Court
For the Northern District of California

Section 10(b) Claim Against Jerry Chang

First Quarter 2000

1. Did Jerry Chang make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's Quarterly Report on Form 10-Q or earnings release for first quarter 2000?

Yes ____ No X

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 2. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 5.

2. Did Jerry Chang act either knowingly or recklessly in making the false statement or omission you found in answering Question 1?

Yes ____ No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 3. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 5.

3. Did Jerry Chang act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly ____

PLEASE PROCEED TO QUESTION 4.

4. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 1?

Yes ____ No ____

PLEASE PROCEED TO QUESTION 5.

Second Quarter 2000

5. Did Jerry Chang make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's

Quarterly Report on Form 10-Q or earnings release for second quarter 2000?

Yes ____ No X

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 6. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 9.

6. Did Jerry Chang act either knowingly or recklessly in making the false statement or omission you found in answering Question 5?

Yes ____ No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 7. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 9.

7. Did Jerry Chang act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly ____

PLEASE PROCEED TO QUESTION 8.

8. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 5?

Yes ____ No ____

PLEASE PROCEED TO QUESTION 9.

Third Quarter 2000

9. Did Jerry Chang make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's Quarterly Report on Form 10-Q or earnings release for third quarter 2000?

Yes ____ No X

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 10. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 13.

United States District Court
For the Northern District of California

United States District Court
For the Northern District of California

10. Did Jerry Chang act either knowingly or recklessly in making the false statement or omission you found in answering Question 9?

Yes ____ No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 11. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 13.

11. Did Jerry Chang act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly ____

PLEASE PROCEED TO QUESTION 12.

12. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 9?

Yes ____ No ____

PLEASE PROCEED TO QUESTION 13.

Fourth Quarter and Year-End 2000

13. Did Jerry Chang make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's Annual Report on Form 10-K for 2000 or earnings release for fourth quarter and year-end 2000?

Yes X No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 14. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 17.

14. Did Jerry Chang act either knowingly or recklessly in making the false statement or omission you found in answering Question 13?

Yes X No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 15. IF YOU ANSWERED "NO,"

PLEASE PROCEED TO QUESTION 17.

15. Did Jerry Chang act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly X

PLEASE PROCEED TO QUESTION 16.

16. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 13?

Yes ____ No X

PLEASE PROCEED TO QUESTION 17.

First Quarter 2001

17. Did Jerry Chang make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's Quarterly Report on Form 10-Q or earnings release for first quarter 2001?

Yes X No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 18. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 21.

18. Did Jerry Chang act either knowingly or recklessly in making the false statement or omission you found in answering Question 17?

Yes X No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 19. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 21.

19. Did Jerry Chang act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly X

PLEASE PROCEED TO QUESTION 20.

United States District Court
For the Northern District of California

20. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 17?

Yes ____ No X

PLEASE PROCEED TO QUESTION 21.

Second Quarter 2001

21. Did Jerry Chang make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's Quarterly Report on Form 10-Q or earnings release for second quarter 2001?

Yes X No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 22. IF YOU ANSWERED "NO," PLEASE SIGN AND DATE BELOW AND THEN PROCEED TO THE JURY VERDICT FORM AS TO ERNST & YOUNG. IF BOTH JURY VERDICT FORMS HAVE BEEN COMPLETED, PLEASE STOP, SIGN AND DATE BELOW, AND REPORT YOUR FINDINGS TO THE COURT.

22. Did Jerry Chang act either knowingly or recklessly in making the false statement or omission you found in answering Question 21?

Yes X No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 23. IF YOU ANSWERED "NO," PLEASE SIGN AND DATE BELOW AND THEN PROCEED TO THE JURY VERDICT FORM AS TO ERNST & YOUNG. IF BOTH JURY VERDICT FORMS HAVE BEEN COMPLETED, PLEASE STOP, SIGN AND DATE BELOW, AND REPORT YOUR FINDINGS TO THE COURT.

23. Did Jerry Chang act knowingly or recklessly (choose one)?

Knowingly X Recklessly ____

PLEASE PROCEED TO QUESTION 24.

24. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 21?

Yes X No ____

PLEASE SIGN AND DATE BELOW AND THEN PROCEED TO THE JURY VERDICT FORM AS TO ERNST & YOUNG. IF BOTH JURY VERDICT FORMS HAVE BEEN COMPLETED, PLEASE STOP, SIGN AND DATE BELOW, AND REPORT YOUR FINDINGS TO THE COURT.

Dated: 2/16/05

Jury Foreperson

United States District Court
For the Northern District of California

United States District Court
For the Northern District of California

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re CLARENT CORPORATION SECURITIES LITIGATION

No. C 01-03361 CRB

/

VERDICT FORM AS TO ERNST & YOUNG LLP'S LIABILITY

United States District Court
For the Northern District of California

Section 10(b) Claim Against Ernst & Young

Year-End 2000

1. Did Ernst & Young make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's Annual Report on Form 10-K for 2000 (including Ernst & Young's Audit Report), issued March 29, 2001?

Yes ____ No X

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 2. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 5.

2. Did Ernst & Young act either knowingly or recklessly in making the false statement or omission you found in answering Question 1?

Yes ____ No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 3. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 5.

3. Did Ernst & Young act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly ____

PLEASE PROCEED TO QUESTION 4.

4. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 1?

Yes ____ No ____

PLEASE PROCEED TO QUESTION 5.

First Quarter 2001

5. Did Ernst & Young make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's

Quarterly Report on Form 10-Q or earnings release for first quarter 2001?

Yes ____ No X

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 6. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 9.

6. Did Ernst & Young act either knowingly or recklessly in making the false statement or omission you found in answering Question 5?

Yes ____ No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 7. IF YOU ANSWERED "NO," PLEASE PROCEED TO QUESTION 9.

7. Did Ernst & Young act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly ____

PLEASE PROCEED TO QUESTION 8.

8. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 5?

Yes ____ No ____

PLEASE PROCEED TO QUESTION 9.

Second Quarter 2001

9. Did Ernst & Young make an untrue statement of a material fact or omit a material fact necessary under the circumstances to keep the statements that were made from being misleading in Clarent's Quarterly Report on Form 10-Q or earnings release for second quarter 2001?

Yes X No ____

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 10. IF YOU ANSWERED "NO," PLEASE SIGN AND DATE BELOW AND THEN PROCEED TO THE JURY VERDICT FORM AS TO JERRY CHANG. IF BOTH JURY VERDICT FORMS HAVE BEEN COMPLETED, PLEASE

United States District Court
For the Northern District of California

STOP, SIGN AND DATE BELOW, AND REPORT YOUR FINDINGS TO THE COURT.

10. Did Ernst & Young act either knowingly or recklessly in making the false statement or omission you found in answering Question 9?

Yes ____ No X

IF YOU ANSWERED "YES," PLEASE PROCEED TO QUESTION 11. IF YOU ANSWERED "NO," PLEASE SIGN AND DATE BELOW AND THEN PROCEED TO THE JURY VERDICT FORM AS TO JERRY CHANG. IF BOTH JURY VERDICT FORMS HAVE BEEN COMPLETED, PLEASE STOP, SIGN AND DATE BELOW, AND REPORT YOUR FINDINGS TO THE COURT.

11. Did Ernst & Young act knowingly or recklessly (choose one)?

Knowingly ____ Recklessly ____

PLEASE PROCEED TO QUESTION 12.

12. Was the market price of Clarent stock inflated as a direct or a reasonably foreseeable result of the misstatement or omission you found in answering Question 9?

Yes ____ No ____

PLEASE SIGN AND DATE BELOW AND THEN PROCEED TO THE JURY VERDICT FORM AS TO JERRY CHANG. IF BOTH JURY VERDICT FORMS HAVE BEEN COMPLETED, PLEASE STOP, SIGN AND DATE BELOW, AND REPORT YOUR FINDINGS TO THE COURT.

Dated: 2/16/05

Jury Foreperson

United States District Court
For the Northern District of California

TAB 3

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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

IN RE HEWLETT-PACKARD COMPANY SECURITIES LITIGATION	Case No. SACV 11-1404-AG (RNBx) **ORDER AWARDING ATTORNEYS' FEES, PAYMENT OF LITIGATION EXPENSES, AND REIMBURSEMENT OF LEAD PLAINTIFFS' EXPENSES INCLUDING LOST WAGES** Judge: Hon. Andrew J. Guilford Dept.: Courtroom 10D Hearing Date: September 15, 2014 Hearing Time: 10:00 a.m.

THIS MATTER having come before the Court on September 15, 2014 for a hearing to determine, among other things, whether and in what amount to award: (1) Plaintiffs' Counsel's fees and litigation expenses relating to their representation of the Settlement Class in the above-captioned securities class action (the "Action"); and (2) Lead Plaintiffs' costs and expenses (including lost wages). The Court having considered all matters submitted to it at the hearing and otherwise; and it appearing that a notice of the hearing, substantially in the form approved by the Court (the "Notice"), was mailed to all reasonably identified Persons who purchased the publicly traded common stock of Hewlett-Packard Company in the open market during the period from November 22, 2010 to August 18, 2011, inclusive; and that a summary notice of the hearing (the "Summary Notice"), substantially in the form approved by the Court, was published in *The Wall Street Journal* and transmitted over *PR Newswire*; and the Court having considered and determined the fairness and reasonableness of: (1) the award of attorneys' fees and litigation expenses requested; and (2) the costs and expenses (including lost wages) requested by Lead Plaintiffs;

NOW, THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED that:

1. The Court has jurisdiction over the subject matter of this Action and over all parties to the Action, including all Settlement Class Members and the Claims Administrator.

2. All capitalized terms used in this order have the meanings as set forth and defined in the Stipulation and Agreement of Settlement (the "Stipulation"), dated as of March 31, 2014.

3. Settlement Class Members were notified that Plaintiffs' Counsel would be applying for an award of attorneys' fees and litigation expenses and, further, that such application also might include a request for an award to Lead

Plaintiffs for reimbursement of their reasonable costs and expenses, including lost wages, in an amount not to exceed $75,000. The form and method of notifying the Settlement Class of the application for attorneys' fees and expenses met the requirements of Rules 23 and 54 of the Federal Rules of Civil Procedure, Section 21(D)(a)(7) of the Securities Act of 1934, 15 U.S.C. §78u-4(a)(7), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), due process, and any other applicable law, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled to it.

4. Plaintiffs' Counsel are awarded attorneys' fees in the amount of $14,250,000, plus interest at the same rate earned by the Settlement Fund (i.e., 25% of the Settlement Fund, which includes interest earned thereon), and payment of litigation expenses in the amount of $333,443.39, plus interest at the same rate earned by the Settlement Fund, which sums the Court finds to be fair and reasonable.

5. The award of attorneys' fees and litigation expenses shall be paid to Co-Lead Counsel from the Settlement Fund immediately upon entry of this Order, subject to the terms, conditions, and obligations of the Stipulation, which terms, conditions, and obligations are incorporated into this order.

6. Lead Plaintiffs are awarded costs and expenses (which includes lost wages) in the following amounts, which sums the Court finds to be fair and reasonable:

LEAD PLAINTIFF	AMOUNT AWARDED
Arkansas Teacher Retirement System	$5,654.61
Union Asset Management Holding AG	$4,970.00
Labourers' Pension Fund of Central and Eastern Canada	$2,922.24

LIUNA National (Industrial) Pension Fund and
LIUNA Staff & Affiliates Pension Fund $6,570.00

The foregoing sums shall be paid to the Lead Plaintiffs from the Settlement Fund immediately upon entry of this Order, subject to the terms, conditions, and obligations of the Stipulation, which terms, conditions, and obligations are incorporated into this order.

7. In making this award of attorneys' fees and litigation expenses and reimbursement of Lead Plaintiffs' costs and expenses (including lost wages) to be paid from the Settlement Fund, the Court has considered and found that:

(a) The Settlement has created a fund of $57 million in cash and that numerous Settlement Class Members who submit acceptable Proofs of Claim will benefit from the Settlement created by the efforts of Plaintiffs' Counsel;

(b) The requested attorneys' fees and payment of litigation expenses have been reviewed and approved as fair and reasonable by Lead Plaintiffs, sophisticated institutional investors that were directly involved in the prosecution and resolution of the Action and who have a substantial interest in ensuring that any fees paid to Plaintiffs' Counsel are duly earned and not excessive;

(c) Notice was disseminated to putative Settlement Class Members stating that Plaintiffs' Counsel would be submitting an application for attorneys' fees in an amount not to exceed 25% of the Settlement Fund, plus interest, and payment of litigation expenses incurred in connection with the prosecution of this Action in an amount not to exceed $525,000, plus interest, and that such application also might include a request that Lead Plaintiffs be reimbursed their reasonable costs and expenses (including lost wages) directly related to their representation of the Settlement Class in an amount not to exceed

$75,000. No Settlement Class Members have filed an objection to the application for fees and expenses submitted by Plaintiffs' Counsel;

(d) Plaintiffs' Counsel conducted the Action and achieved the Settlement with skillful and diligent advocacy;

(e) The Action involves complex factual and legal issues and, in the absence of settlement, would involve lengthy proceedings whose resolution would be uncertain;

(f) Plaintiffs' Counsel undertook the Action on a contingent basis and have devoted more than 13,000 hours, with a lodestar value of $7,525,051.75 to achieve the Settlement; and

(g) The amount of attorneys' fees, litigation expenses, and reimbursement of Lead Plaintiffs' costs and expenses (including lost wages) paid from the Settlement Fund is fair and reasonable and consistent with awards in similar cases.

8. Any appeal or challenge affecting this Court's approval of any attorneys' fee, expense application, or award of costs and expenses (including lost wages) to Lead Plaintiffs in the Action shall in no way disturb or affect the finality of the Judgment entered with respect to the Settlement.

9. Exclusive jurisdiction is retained over the subject matter of this Action and over all parties to the Action, including the administration and distribution of the Net Settlement Fund to Settlement Class Members.

10. In the event that the Settlement is terminated or does not become Final or the Effective Date does not occur in accordance with the terms of the Stipulation, this order shall be rendered null and void to the extent provided by the Stipulation and shall be vacated in accordance with the Stipulation.

SO ORDERED this 15th day of September, 2014

ANDREW J. GUILFORD
UNITED STATES DISTRICT JUDGE

TAB 4

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Lead Counsel for Plaintiffs and the Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

IN RE INTUITIVE SURGICAL SECURITIES LITIGATION	Case No. 5:13-cv-01920 EJD (HRL) CLASS ACTION **[~~PROPOSED~~] ORDER AWARDING ATTORNEYS' FEES, PAYMENT OF EXPENSES, AND PAYMENT OF CLASS REPRESENTATIVES' EXPENSES**

On December 20, 2018, a hearing having been held before this Court to determine, among other things, whether and in what amount to award (1) Class Counsel in the above-captioned consolidated securities class action (the "Action") fees and litigation expenses directly

relating to their representation of the Class; and (2) Class Representatives their costs and expenses (including lost wages), pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"). The Court having considered all matters submitted to it at the hearing and otherwise; and it appearing that a notice of the hearing substantially in the form approved by the Court (the "Settlement Notice") was mailed to all reasonably identified Class Members; and that a summary notice of the hearing (the "Summary Notice"), substantially in the form approved by the Court, was published in *Investor's Business Daily* and transmitted over *PR Newswire*; and the Court having considered and determined the fairness and reasonableness of the award of attorneys' fees and expenses requested;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. The Court has jurisdiction over the subject matter of this Action and over all parties to the Action, including all Class Members who have not timely and validly requested exclusion, Plaintiffs' counsel, and the Claims Administrator.

2. All capitalized terms used herein have the meanings set forth and defined in the Stipulation and Agreement of Settlement, dated as of September 11, 2018 (the "Stipulation").

3. Notice of Class Counsel's application for attorneys' fees and payment of litigation expenses was given to all Class Members who could be identified with reasonable effort. The form and method of notifying the Class of the application for attorneys' fees and expenses met the requirements of Rules 23 and 54 of the Federal Rules of Civil Procedure, Section 21D(a)(7) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(7), as amended by the PSLRA, due process, and other applicable law, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Class Counsel are hereby awarded, on behalf of all Plaintiffs' counsel, attorneys' fees in the amount of $8,075,000 plus interest at the same rate earned by the Settlement Fund (which is 19% of the Settlement Fund), and payment of litigation expenses in the amount of $1,988,789.66, which sums the Court finds to be fair and reasonable.

5. The award of attorneys' fees and litigation expenses may be paid to Class Counsel from the Settlement Fund immediately upon entry of this Order, subject to the terms, conditions, and obligations of the Stipulation, which terms, conditions, and obligations are incorporated herein.

6. In making this award of attorneys' fees and payment of litigation expenses to be paid from the Settlement Fund, the Court has analyzed the factors considered within the Ninth Circuit and found that:

(a) The Settlement has created a common fund of $42.5 million in cash and that numerous Class Members who submit acceptable Claim Forms will benefit from the Settlement created by the efforts of counsel;

(b) The requested attorneys' fees and payment of litigation expenses have been reviewed and approved as fair and reasonable by Class Representatives, sophisticated institutional investors that were directly involved in the prosecution and resolution of the Action and who have a substantial interest in ensuring that any fees paid to counsel are duly earned and not excessive;

(c) Class Counsel undertook the Action on a contingent basis, and have received no compensation during the Action, and any fee and expense award has been contingent on the result achieved;

(d) The Action involves complex factual and legal issues and, in the absence of settlement, would involve lengthy proceedings whose resolution would be uncertain;

(e) Class Counsel conducted the Action and achieved the Settlement with skillful and diligent advocacy;

(f) Plaintiffs' counsel have devoted approximately 41,813.90 hours, with a lodestar value of $21,548,609.00 to achieve the Settlement;

(g) The amount of attorneys' fees awarded are fair and reasonable and are less than fee awards approved in cases within the Ninth Circuit with similar recoveries;

(h) Notice was disseminated to putative Class Members stating that Class Counsel would be submitting an application for attorneys' fees in an amount not to exceed 19% of the Settlement Fund, which includes interest, and payment of litigation expenses incurred in connection with the prosecution of this Action up to $2,500,000 plus interest, and that such application also might include a request that Class Representatives be reimbursed their reasonable costs and expenses (including lost wages) directly related to their representation of the Class; and

(i) There were no objections to the application for attorneys' fees or expenses.

7. In accordance with the PSLRA, the Court hereby awards Class Representative Employees' Retirement System of the State of Hawaii $49,754.18 for its costs and expenses directly related to its representation of the Class, and Class Representative Greater Pennsylvania Carpenters' Pension Fund $9,100.00 for its costs and expenses directly related to its representation of the Class.

8. Any appeal or challenge affecting this Court's approval of any attorneys' fee, expense application, or award of costs and expenses to Class Representatives in the Action, shall in no way disturb or affect the finality of the Judgment entered with respect to the Settlement.

9. Exclusive jurisdiction is retained over the subject matter of this Action and over all parties to the Action, including the administration of the Settlement.

10. In the event that the Settlement is terminated or does not become Final or the Effective Date does not occur in accordance with the terms of the Stipulation, this order shall be rendered null and void to the extent provided by the Stipulation and shall be vacated in accordance with the Stipulation.

Dated: December 20, 2018

HONORABLE EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE

TAB 5

1

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re JDS UNIPHASE CORPORATION SECURITIES LITIGATION

No. C 02-1486 CW

VERDICT QUESTIONS FORM

FILED
NOV 27 2007
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

Part A--Section 10(b) and Section 20 False or Misleading Statements Liability

Please answer the questions below for each of the statements on the Table of Challenged Statements and indicate your unanimous answers on the Verdict Table. If a box on the Verdict Table is blacked out or already filled in, that means that the question does not apply to the corresponding statement or that the parties have agreed to an answer. Please skip any question that is blacked out or already answered. A "yes" answer favors Plaintiffs; a "no" answer favors Defendants.

1. Do you find that this challenged statement contains an untrue statement of material fact, or omits a material fact necessary under the circumstances to keep the statement that was made from being misleading? Answer Yes or No.

If you answered "Yes," please proceed to Question 2, and if Question 2 is blacked out, please skip to Question 3. If you answered "No," please return to Question 1 for the next statement.

2. Do you find that the challenged statement was not accompanied by meaningful cautionary statements as defined in the instructions? Answer Yes or No.

If you answered "Yes," please proceed to Question 3. If you answered "No," please return to Question 1 for the next statement.

3. Please enter "Yes" in the box representing any Individual Defendant who you find was substantially involved in the preparation of the challenged statement.

If you identified any Individual Defendant, or if any Individual Defendant was already marked, please proceed to Question 4a. If you did not identify any Individual Defendant and no Individual Defendant was already marked, please return to Question 1 for the next statement.

United States District Court
For the Northern District of California

4a. Do you find that any Individual Defendant who you found in Question 3 made or was responsible for the statement, or who the parties agree made the statement, did so with actual knowledge that the statement was materially false or misleading? Answer Yes or No.

If you answered "No" for any Individual Defendant identified in Question 4a, please answer Question 4b for that Individual Defendant. Otherwise, skip to Question 5.

4b. Do you find that any Individual Defendant who you found in Question 3 made or was responsible for the statement, or who the parties agree made the statement, did so with deliberate recklessness? Answer Yes or No.

If you answered "Yes" to Question 4a or 4b for any Individual Defendant, please proceed to Question 5. Otherwise, please return to Question 1 for the next statement.

5. Do you find that the untrue statement of material fact, or the omitted material fact, played a substantial part in causing a loss to Plaintiffs? Answer Yes or No.

If you answered "Yes," please proceed to Question 6. If you answered "No," please return to Question 1 for the next statement.

6. Please enter "Yes" in the box representing any Individual Defendant who you find directly or indirectly controlled the person who made the challenged statement, directly or indirectly induced the person to make the statement, and did not act in good faith.

Please return to Question 1 for the next statement. When you have completed the chart for all statements, please review your answers recorded on the Verdict Table. If you found for Plaintiff on any statement (i.e. if you answered "yes" in Column 5 for any statement), please proceed to Part B, Question 7. Otherwise, please skip to Part D, Question 14.

United States District Court
For the Northern District of California

Part B--Section 10(b) and Section 20 False or Misleading Statements Damages

7. Which of these two methods do you find is the most accurate method for calculating damages in this case?

___ Dollar Inflation ___ Percentage Inflation

If you selected "Dollar Inflation," please complete Question 8. If you selected "Percentage Inflation," please complete Question 9 on Page 5. (Do not complete both tables.)

8. If you answered "Dollar Inflation," please complete the table, following the instructions below.

a. Please black out Column 2 for any date on which you do not find that the challenged statement(s) on that date caused a loss (i.e. for which you answered "No" in Column 5 of the Verdict Table).
b. Beginning with the first date that is not blacked out in Column 2, please enter the dollar amount by which you find the false or misleading statement(s) made on that date inflated the price of JDSU stock.
c. For this first row only, please copy the amount you entered in Column 2 into Column 4.
d. Proceed to the next row. If Column 2 is not blacked out, enter the dollar amount by which you find the false or misleading statement(s) made on this date inflated the price of JDSU stock. Enter, in Column 3, the amount, if any, by which you find that any corrective disclosures, since the date of the previous row, have reduced the inflation created by false or misleading statements. Take the number from Column 4 in the previous row, add the number, if any, in Column 2, subtract the number, if any, in Column 3, and enter the result in Column 4.
e. Please continue to complete each row.

When you are finished, please skip to Part C, Question 10.

United States District Court
For the Northern District of California

United States District Court
For the Northern District of California

Dollar Inflation Table

COLUMN 1	COLUMN 1a	COLUMN 2	COLUMN 3	COLUMN 4
Date	Price per share on this Date	Inflation created by false or misleading statement(s) on this date	Reduction in inflation due to corrective disclosures, if any, since previous date	Total inflation due to challenged statements on this date
4/25/00	$93.38	$		$
5/25/00	$79.00		$	$
6/25/00	$123.44		$	$
7/26/00	$135.94	$	$	$
8/25/00	$125.31		$	$
9/1/00	$123.81	$	$	$
9/7/00	$119.88	$	$	$
10/26/00	$74.44	$	$	$
10/30/00	$71.31	$	$	$
11/14/00	$75.63	$	$	$
11/17/00	$70.13	$	$	$
12/20/00	$46.00		$	$
1/25/01	$55.19	$	$	$
2/12/01	$40.63	$	$	$
2/13/01	$38.50	$	$	$
3/23/01	$23.19	$	$	$
4/24/01	$20.82	$	$	$
5/11/01	$20.69	$	$	$
6/15/01	$12.44		$	$
7/26/01	$9.47		$	$

9. If you selected "Percentage Inflation" in Question 7 above, please complete the table, following the instructions below.

a. Please black out Column 2 for any date on which you do not find that the challenged statement(s) on that date caused a loss (i.e. for which you answered "No" in Column 5 of the Verdict Table).
b. Beginning with the first date that is not blacked out in Column 2, please enter the percent by which you find the false or misleading statement(s) made on that date inflated the price of JDSU stock.
c. For this first row only, please copy the amount you entered in Column 2 into Column 4.
d. Proceed to the next row. If Column 2 is not blacked out, enter the percent by which you find that any false or misleading statement(s) made on this date inflated the price of JDSU stock. Enter, in Column 3, the amount, if any, by which you find that any corrective disclosures, since the date of the previous row, have reduced the inflation created by false or misleading statements. Take the number from Column 4 in the previous row, add the number, if any, in Column 2, subtract the number, if any, in Column 3, and enter the result in Column 4.
e. Please continue to complete each row.

When you are finished, please proceed to Part C, Question 10.

United States District Court
For the Northern District of California

United States District Court
For the Northern District of California

Percentage Inflation Table

COLUMN 1	COLUMN 2	COLUMN 3	COLUMN 4
Date	Inflation created by false or misleading statement(s) on this date	Reduction in inflation due to corrective disclosures since previous date	Total inflation due to challenged statements on this date
4/25/00	%	[redacted]	%
5/25/00	[redacted]	%	%
6/25/00	[redacted]	%	%
7/26/00	%	%	%
8/25/00	[redacted]	%	%
9/1/00	%	%	%
9/7/00	%	%	%
10/26/00	%	%	%
10/30/00	%	%	%
11/14/00	%	%	%
11/17/00	%	%	%
12/20/00	[redacted]	%	%
1/25/01	%	%	%
2/12/01	%	%	%
2/13/01	%	%	%
3/23/01	%	%	%
4/24/01	%	%	%
5/11/01	%	%	%
6/15/01	[redacted]	%	%
7/26/01	[redacted]	%	%

Part C--Section 14(a) Misrepresentation in a Proxy Statement for Merger Liability & Damages

If you found in answer to Question 1 above that Statement 10 was materially false or misleading, please answer Question 10. Otherwise, please skip to Part D, Question 14.

10. Do you find that statement 10 was an essential link in the accomplishment of the JDS-SDL merger?

___ Yes X No

Please proceed to Question 11

11. Do you find that Defendant Straus failed to act with ordinary or reasonable care when he made statement 10?

11/20

___ Yes ✓ No

Please proceed to Question 12.

12. Do you find that Defendant Muller failed to act with ordinary or reasonable care when he made statement 10?

11/20

___ Yes ✓ No

If you have answered "Yes" to Question 10 and to either Question 11 and/or Question 12, please proceed to Question 13. Otherwise, please skip to Part D, Question 14.

13a. If you did not determine damages for Statement 10 on the Verdict Table, do you find that Statement 10 played a substantial part in causing a loss to Plaintiffs?

11/20

___ Yes ✓ No

If you answered "Yes," please proceed to Question 13b. Otherwise, please skip to Part D, Question 14.

13b. What is the dollar amount or percentage amount that Statement 10 inflated the price of JDSU stock on February 13, 2001? Please answer only once, using the method you selected in response to Question 7.

$_____ or _____%

Please proceed to Part D, Question 14.

Part D--Section 20A Trading on Inside Information Liability & Damages

14. Do you find that one or more of the Individual Defendants made a decision to sell shares of JDSU stock using material, non-public information about the company?

Defendant Abbe	Yes	____	No	X
Defendant Kalkhoven	Yes	____	No	X
Defendant Muller	Yes	____	No	X
Defendant Straus	Yes	____	No	X

If you answered "Yes" as to any defendant, please proceed. Otherwise, sign, date and return your verdict.

If, in answer to Question 7, you selected "Dollar Inflation," please complete Question 15. If you selected "Percentage Inflation," please skip to Question 16 on Page 12. (Do not complete both tables.)

15. If you selected "Dollar Inflation" in Question 7, please complete the table below for any Defendant who you found sold JDSU stock using material, non-public information.

a. Enter "Yes" in Column 2 for the date of any stock sale which you find the Individual Defendant made using material, non-public information about the company.

b. For every date on which you answered "Yes", please enter the dollar amount by which the price of JDSU stock was inflated because the public did not have this material information.

Then sign, date and return your verdict.

Dollar Inflation Tables

Defendant Abbe

Column 1	Column 1a	Column 2	Column 3
Date	Market Price Per Share on Date	Used Material, Non-Public Information?	Dollar Inflation on Date of Sale
8/1/00	$116.87		$
8/11/00	$117.75		$
2/26/01	$32.63		$
2/27/01	$27.81		$
2/28/01	$26.75		$

Defendant Kalkhoven

Column 1	Column 1a	Column 2	Column 3
Date	Market Price Per Share on Date	Used Material, Non-Public Information?	Dollar Inflation on Date of Sale
5/22/00	$85.31		$
5/24/00	$83.50		$
7/31/00	$118.16		$
8/4/00	$115.94		$
8/7/00	$121.19		$
8/21/00	$124.38		$
8/22/00	$124.50		$
8/31/00	$124.48		$
9/1/00	$123.81		$
9/7/00	$119.88		$
9/12/00	$103.19		$
9/13/00	$104.81		$

9/18/00	$97.81		$
9/19/00	$107.94		$
9/20/00	$107.13		$
9/22/00	$107.00		$
9/25/00	$106.81		$
10/4/00	$94.06		$
10/5/00	$95.06		$
10/11/00	$85.88		$
10/13/00	$94.38		$
10/16/00	$94.44		$
10/20/00	$102.38		$
10/27/00	$77.25		$
11/1/00	$78.56		$
1/18/01	$60.31		$

Defendant Muller

Column 1	Column 1a	Column 2	Column 3
Date	Market Price Per Share on Date	Used Material, Non-Public Information?	Dollar Inflation on Date of Sale
5/22/00	$85.31		$
5/30/00	$91.38		$
7/31/00	$118.13		$
8/1/00	$116.88		$
8/2/00	$112.63		$
8/4/00	$115.94		$
8/7/00	$121.19		$
8/8/00	$119.88		$
8/11/00	$117.75		$
8/14/00	$120.25		$

United States District Court
For the Northern District of California

Defendant Straus

Column 1	Column 1a	Column 2	Column 3
Date	Market Price Per Share on Date	Used Material, Non-Public Information?	Dollar Inflation on Date of Sale
8/1/00	$116.88		$
8/4/00	$115.94		$
8/7/00	$121.19		$
*	$55.81	11/30/00	2/1/01 $
*	$28.00	11/30/00	3/6/01 $

*You must determine whether Defendant Straus used material, non-public information on November 30, 2000 in deciding whether he is liable for insider trading based on these sales. However, the damages must be calculated as of the actual date of the sales.

16. If you selected "Percentage Inflation" in Question 7, please complete the table below for any Defendant who you found sold JDSU stock using material, non-public information.

a. Enter "Yes" in Column 2 for the date of any stock sale which you find the Individual Defendant made while using material, non-public information about the company.

b. For every date on which you answered "Yes", please enter the percentage by which the price of JDSU stock was inflated because the public did not have this material information.

Then sign, date and return your verdict.

United States District Court
For the Northern District of California

United States District Court
For the Northern District of California

Percentage Inflation Tables

Defendant Abbe

Column 1	Column 2	Column 3
Date	Used Material, Non-Public Information?	Percentage Inflation on Date of Sale
8/1/00		%
8/11/00		%
2/26/01		%
2/27/01		%
8/1/00		%

Defendant Kalkhoven

Date	Used Material, Non-Public Information?	Percentage Inflation on Date of Sale
5/22/00		%
5/24/00		%
7/31/00		%
8/4/00		%
8/7/00		%
8/21/00		%
8/22/00		%
8/31/00		%
9/1/00		%
9/7/00		%
9/12/00		%
9/13/00		%
9/18/00		%
9/19/00		%
9/20/00		%
9/22/00		%

9/25/00		%
10/4/00		%
10/5/00		%
10/11/00		%
10/13/00		%
10/16/00		%
10/20/00		%
10/27/00		%
11/1/00		%
1/18/01		%

Defendant Muller

Date	Used Material, Non-Public Information?	Percentage Inflation on Date of Sale
5/22/00		%
5/30/00		%
7/31/00		%
8/1/00		%
8/2/00		%
8/4/00		%
8/7/00		%
8/8/00		%
8/11/00		%
8/14/00		%

United States District Court
For the Northern District of California

Defendant Straus

Date	Used Material, Non-Public Information?	Percentage Inflation on Date of Sale
8/1/00		%
8/4/00		%
8/7/00		%
*	11/30/00	2/1/01 %
*	11/30/00	3/6/01 %

*You must determine whether Defendant Straus used material, non-public information on November 30, in deciding whether he is liable for insider trading based on these sales. However, the damages must be calculated as of the actual date of the sales.

Please sign, date and return this form.

Dated:

Jury Foreperson

11/27/07. 1515 HRS.

United States District Court
For the Northern District of California

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VERDICT TABLE

	Quest. No. 1	Quest. No. 2	Quest. No. 3				Quest. No. 4a				Quest. No. 4b				Quest. No. 5	Quest. No. 6			
	Materially False or Misleading	Lacks Cautionary Language	Person(s) Making Statement				Actual Knowledge				Reckless Disregard				Caused Loss	Controlling Person			
			Abbe	Kalkhoven	Muller	Straus	Abbe	Kalkhoven	Muller	Straus	Abbe	Kalkhoven	Muller	Straus		Abbe	Kalkhoven	Muller	Straus
Statement No. 1 "... the market is exceeding, you know, our ability to ramp up ..."	11/20 NO					Yes													
Statement No. 2 "In all of these markets, the demand for bandwidth technology and components remains incredibly strong, and I believe we will see this demand accelerated."	11/20 NO			Yes															
Statement No. 3 "Two-and-a-half-gigabit modulators continue to demonstrate strong growth ..."	11/20 NO					Yes													
(Goodwill) Statement No. 4 JDSU's intangible assets at June 30, 2000, were $22.3 billion, including goodwill of $21.3 billion.	11/27 NO				Yes														
(Goodwill) Statement No. 5 JDSU's intangible assets, including goodwill, were $22.3 billion at June 30, 2000.	11/27 NO				Yes	Yes													
Statement No. 6 "... we still are ... capacity constrained ..."	11/20 NO		Yes																
Statement No. 7 "These results reflect ... our substantial progress in expanding capacity to enable us to meet customer demand and serve the needs of our markets."	11/20 NO				Yes														
(Goodwill) Statement No. 8 JDSU's intangible assets at June 30, 2000, were $22.3 billion, including goodwill of $21.3 billion.	11/27 NO				Yes	Yes													
(Goodwill) Statement No. 9 JDSU's goodwill was "21.1 [billion]" at September 30, 2000.	11/29 NO				Yes														

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	Quest. No. 1	Quest. No. 2	Quest. No. 3				Quest. No. 4a				Quest. No. 4b				Quest. No. 5	Quest. No. 6			
	Materially False or Misleading	Lacks Cautionary Language	Person(s) Making Statement				Actual Knowledge				Reckless Disregard				Caused Loss	Controlling Person			
			Abbe	Kalkhoven	Muller	Straus	Abbe	Kalkhoven	Muller	Straus	Abbe	Kalkhoven	Muller	Straus		Abbe	Kalkhoven	Muller	Straus
(Goodwill) Statement No. 10 • JDSU's intangible assets at June 30, 2000, were $22.3 billion, including goodwill of $21.3 billion. • JDSU's goodwill was "$21.1 [billion]" at September 30, 2000.	11/16 NO				Yes	Yes													
Statement No. 11 "We don't expect lead times to come down in the near-term because our demand is so strong."	NO		Yes																
Statement No. 12 "Our backlog . . . is enormous . . ."	NO		Yes																
Statement No. 13 "For the year, we expect earnings-per-share to be at 82 cents . . ."	NO				Yes														
Statement No. 14 "We anticipate sales in the March quarter to be 7 percent to 10 percent above sales for the quarter ended December 30."	11/27 NO				Yes														
(Inventory) Statement No. 15 JDSU's inventories balance at December 30, 2000, was "[$]493.9 [million]."	11/20 NO																		
(Goodwill) Statement No. 16 • JDSU's intangible assets at June 30, 2000, were $22.3 billion, including goodwill of $21.3 billion. • JDSU's goodwill was "$21.1 [billion]" at September 30, 2000.	11/29 NO				Yes	Yes													
Statement No. 17 "The Company expects sales in the quarter ending March 31 to be at or slightly above $1 billion with earnings per share of $0.17."	11/26 NO																		
(Inventory) Statement No. 18 JDSU's inventories balance was "[$]493.9 [million]" at December 30, 2000.	11/26 NO				Yes														
(Goodwill) Statement No. 19 JDSU's goodwill was $21.2 billion at December 30, 2000.	11/25 NO				Yes														

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	Quest. No. 1	Quest. No. 2	Quest. No. 3				Quest. No. 4a				Quest. No. 4b				Quest. No. 5	Quest. No. 6			
	Materially False or Misleading	Lacks Cautionary Language	Person(s) Making Statement				Actual Knowledge				Reckless Disregard				Caused Loss	Controlling Person			
			Abbe	Kalkhoven	Muller	Straus	Abbe	Kalkhoven	Muller	Straus	Abbe	Kalkhoven	Muller	Straus		Abbe	Kalkhoven	Muller	Straus
(Goodwill) Statement No. 20 JDSU and SDL's combined *pro forma* intangible assets, including goodwill, were $60.2 billion at December 30, 2000.	11/23 NO	[redacted]		[redacted]	Yes			[redacted]				[redacted]					[redacted]	[redacted]	
(Inventory) Statement No. 21 JDSU's inventories balance was $493.9 million at December 30, 2000.	11/26 NO				Yes														
(Inventory) Statement No. 22 • "Our third quarter results were . . . pro forma earnings of 14 cents per share." • "Pro forma gross margin was 48.6 percent of sales for the quarter."	11/26 NO				Yes	Yes													[redacted]
(Inventory) Statement No. 23 JDSU's gross profits were $425.9 million for the quarter ended March 31, 2001, and $1,251.0 million for the nine months ended March 31, 2001.	11/26 NO																		
(Inventory) Statement No. 24 JDSU's inventories balance was "[$]672.9 [million]" at March 31, 2001.	11/26 NO				Yes													[redacted]	

THE JURY FINDS UNANIMOUSLY THAT ALL DECISIONS IN FAVOR OF THE DEFENSE DEFENDANT. ON ALL COUNTS. NO DAMAGES FINANCIAL AWARDS. AWARDED

The jury find unanimously in favor of the defense on all Counts. No financial damages awarded.

TAB 6

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE TESLA INC., SECURITIES LITIGATION

Case No. 18-cv-04865-EMC

VERDICT FORM

VERDICT FORM

United States District Court
Northern District of California

A. **RULE 10B-5 CLAIM: LIABILITY**

Statement No. 1: "Am considering taking Tesla private at $420. Funding secured."

1. Has Plaintiff proved their Rule 10b-5 Claim against Elon Musk for Statement No. 1 identified above?

Yes: _____ No: X

2. Has Plaintiff proved their Rule 10b-5 Claim against Tesla Inc. for Statement No. 1 identified above?

Yes: _____ No: X

PLEASE PROCEED TO THE NEXT PAGE.

Statement No. 2: "Investor support is confirmed. Only reason why this is not certain is that it's continent on a shareholder vote."

3. Has Plaintiff proved their Rule 10b-5 Claim against Elon Musk for Statement No. 2 identified above?

Yes: _____ No: X

4. Has Plaintiff proved their Rule 10b-5 Claim against Tesla Inc. for Statement No. 2 identified above?

Yes: _____ No: X

IF YOU CHECKED "YES" FOR ONE OR MORE QUESTIONS IN STATEMENT NOS. 1 OR 2, PLEASE PROCEED TO THE NEXT PAGE.

IF YOU CHECKED "NO" FOR EVERY QUESTION IN STATEMENT NOS. 1 AND 2, PLEASE PROCEED TO SECTION E.

B. RULE 10B-5 CLAIM: DAMAGES

1. Determine the amount of artificial inflation per share of Tesla stock proved by Plaintiff on each date during the Class Period and write it in the table below. If you find that Plaintiff did not prove artificial inflation on any particular day or days, please leave that date blank.

	07-Aug	08-Aug	09-Aug	10-Aug	13-Aug	14-Aug	15-Aug	16-Aug	17-Aug
($/share)	$__.__	$__.__	$__.__	$__.__	$__.__	$__.__	$__.__	$__.__	$__.__

PLEASE PROCEED TO THE NEXT PAGE.

2. Determine the "but for" implied volatility percentages proved by Plaintiff for each option contract maturity date during the Class Period and write it in the table below. If you find that Plaintiff did not prove "but-for" implied volatility for any particular option contract or for any particular date, please leave that date and/or option contract maturity date blank.

		Day of Class Period at Close of Market							
		07-Aug	08-Aug	09-Aug	10-Aug	13-Aug	14-Aug	15-Aug	16-Aug
Maturity Date	Aug 10, 2018	___%	___%	___%	NA	NA	NA	NA	NA
	Aug 17, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Aug 24, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Aug 31, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Sep 7, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Sep 14, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Sep 21, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Sep 28, 2018	NA	NA	___%	___%	___%	___%	___%	___%
	Oct 19, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Nov 16, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Dec 21, 2018	___%	___%	___%	___%	___%	___%	___%	___%
	Jan 18, 2019	___%	___%	___%	___%	___%	___%	___%	___%
	Feb 15, 2019	___%	___%	___%	___%	___%	___%	___%	___%
	Mar 15, 2019	___%	___%	___%	___%	___%	___%	___%	___%
	Jun 21, 2019	___%	___%	___%	___%	___%	___%	___%	___%
	Aug 16, 2019	___%	___%	___%	___%	___%	___%	___%	___%
	Jan 17, 2020	___%	___%	___%	___%	___%	___%	___%	___%

United States District Court
Northern District of California

3. Determine the amount of artificial inflation per Tesla corporate bond proved by Plaintiff on each date during the Class Period and write it in the table below. If you find that Plaintiff did not prove artificial inflation on any particular day or days, please leave that date blank.

	07-Aug	08-Aug	09-Aug	10-Aug	13-Aug	14-Aug	15-Aug	16-Aug	17-Aug
2019 Note									
2021 Note									
2022 Note									

PLEASE PROCEED TO THE NEXT PAGE.

C. SECTION 20(A) CLAIM: LIABLITY

If you answered "Yes" to one or more questions in Section A, please answer the following questions.

1. Has Plaintiff proved the Section 20(a) Claim as to any of the Tesla Director Defendants (check all that apply):

Brad W. Buss:	Yes: _____	No: _____
Robyn Denholm:	Yes: _____	No: _____
Ira Ehrenpreis:	Yes: _____	No: _____
Antonio J. Gracias:	Yes: _____	No: _____
James Murdoch:	Yes: _____	No: _____
Kimbal Musk:	Yes: _____	No: _____
Linda Johnson Rice:	Yes: _____	No: _____

2. If you answered "Yes" in response to Question No. 1 as to any Defendant, have Defendants proved a Good Faith Defense as to that Defendant (check all that apply):

Brad W. Buss:	Yes: _____	No: _____
Robyn Denholm:	Yes: _____	No: _____
Ira Ehrenpreis:	Yes: _____	No: _____
Antonio J. Gracias:	Yes: _____	No: _____
James Murdoch:	Yes: _____	No: _____
Kimbal Musk:	Yes: _____	No: _____
Linda Johnson Rice:	Yes: _____	No: _____

D. ALLOCATION OF RESPONSIBILITY

1. For any Defendant whom you found liable, did that Defendant commit a knowing violation of the federal securities laws? Only answer this question as to the Defendants against whom you found that Plaintiff proved a claim.

Elon Musk:	Yes: _____	No: _____
Tesla:	Yes: _____	No: _____
Brad W. Buss:	Yes: _____	No: _____
Robyn Denholm:	Yes: _____	No: _____
Ira Ehrenpreis:	Yes: _____	No: _____
Antonio J. Gracias:	Yes: _____	No: _____
James Murdoch:	Yes: _____	No: _____
Kimbal Musk:	Yes: _____	No: _____
Linda Johnson Rice:	Yes: _____	No: _____

PLEASE PROCEED TO THE NEXT PAGE.

2. Please decide each Defendant's share of responsibility for Plaintiff's losses. Only assign a percentage of responsibility to those Defendants whom you found liable, including those who acted recklessly. The total must add up to 100%.

Elon Musk: _____%

Tesla: _____%

Brad W. Buss: _____%

Robyn Denholm: _____%

Ira Ehrenpreis: _____%

Antonio J. Gracias: _____%

James Murdoch: _____%

Kimbal Musk: _____%

Linda Johnson Rice: _____%

PLEASE PROCEED TO THE NEXT PAGE.

E. RETURN OF VERDICT

Once the form is completed, the foreperson for the jury must sign and date it below.

Dated: FEBRUARY 3, 2023 Signed: _____

Jury Foreperson

United States District Court
Northern District of California

TAB 7

ROBBINS GELLER RUDMAN & DOWD LLP
DANIEL S. DROSMAN (200643)
TOR GRONBORG (179109)
ELLEN GUSIKOFF STEWART (144892)
LUCAS F. OLTS (234843)
J. MARCO JANOSKI GRAY (306547)
CHRISTOPHER R. KINNON (316850)
HEATHER G. SCHLESIER (322937)
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)

MOTLEY RICE LLC
GREGG S. LEVIN (admitted *pro hac vice*)
LANCE V. OLIVER (admitted *pro hac vice*)
MEGHAN S.B. OLIVER (admitted *pro hac vice*)
MAX N. GRUETZMACHER (admitted *pro hac vice*)
CHRISTOPHER F. MORIARTY (admitted *pro hac vice*)
MEREDITH B. WEATHERBY (admitted *pro hac vice*)
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
Telephone: 843/216-9000
843/216-9450 (fax)

Co-Class Counsel for the Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re TWITTER INC. SECURITIES LITIGATION	Case No. 4:16-cv-05314-JST (SK)
	CLASS ACTION
This Document Relates To: ALL ACTIONS.	ORDER AWARDING ATTORNEYS' FEES AND EXPENSES *AS MODIFIED*

THIS MATTER having come before the Court on November 17, 2022, on Class Counsel's motion for an award of attorneys' fees, expenses, and awards to Class Representatives pursuant to 15 U.S.C. §78u-4(a)(4) (ECF 661) in the above-captioned action. The Court here addresses Class Counsel's requests for fees and expenses, and issues a separate order concerning awards to the Class Representatives pursuant to 15 U.S.C. §78u-4(a)(4). The Court having considered all papers filed and proceedings conducted herein and otherwise being fully informed of the matters hereto and good cause appearing therefore;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. For purposes of this Order, the terms used herein shall have the same meanings as set forth in the Stipulation of Settlement dated January 5, 2022 (the "Stipulation"). ECF 653-4.

2. This Court has jurisdiction over the subject matter of this Litigation and all matters relating hereto, including all members of the Class who have not timely and validly requested exclusion.

3. Notice of Class Counsel's motion for attorneys' fees and payment of expenses was given to all Class Members who could be identified with reasonable effort. The form and method of notifying the Class of the motion for attorneys' fees and expenses met the requirements of Rules 23 and 54 of the Federal Rules of Civil Procedure, Section 21D(a)(7) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(7), as amended by the Private Securities Litigation Reform Act of 1995, due process, and any other applicable law, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. The Court hereby awards Class Counsel attorneys' fees of 22.5% of the Settlement Amount, plus expenses in the amount of $3,570,056.21, together with the interest earned thereon for the same time period and at the same rate as that earned on the Settlement Fund until paid. The Court finds that the amount of fees awarded is appropriate, fair, and reasonable under the "percentage-of-recovery" method given the substantial risks of non-recovery, the contingent nature of the representation, awards in similar cases, the time and effort

involved, and the result obtained for the Class. *See Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1049-50 (9th Cir. 2002).

5. Ninety percent of the awarded attorneys' fees and expenses and interest earned thereon shall be paid to Class Counsel from the Settlement Fund immediately upon entry of the Judgment and this Order, subject to the terms, conditions, and obligations of the Stipulation, the terms, conditions, and obligations of which are incorporated herein. The remaining 10% of the awarded attorneys' fees and expenses and interest earned thereon will be withheld until a post-distribution accounting has been filed. A post-distribution accounting must be filed within 21 days after the distribution of settlement funds.

6. In making this award of fees and expenses to Class Counsel, the Court has considered and found that:

(a) the Settlement has created a fund of $809,500,000 in cash that is already on deposit, and numerous Class Members who submit, or have submitted, valid Proof of Claim forms will benefit from the Settlement created by Class Counsel;

(b) over 464,450 copies of the Notice were disseminated to potential Class Members indicating that Class Counsel would move for attorneys' fees not to exceed 22.5% of the Settlement Amount and for expenses in an amount not to exceed $4,000,000, plus interest thereon, and no objections to the fees or expenses were filed by Class Members;

(c) Class Counsel have pursued the Litigation and achieved the Settlement with skill, perseverance, and diligent advocacy;

(d) Class Counsel have expended substantial time and effort pursuing the Litigation on behalf of the Class;

(e) Class Counsel pursued the Litigation on a contingent basis, having received no compensation during the Litigation, and any fee amount has been contingent on the result achieved;

(f) the Litigation involves complex factual and legal issues and, in the absence of settlement, would involve lengthy proceedings whose resolution would be uncertain;

(g) had Class Counsel not achieved the Settlement, there would remain a significant risk that the Class may have recovered less or nothing from Defendants;

(h) Plaintiffs' Counsel have devoted over 73,400 hours, with a lodestar value of $43,931,080.75 to achieve the Settlement;

(i) Class Representatives approved the amount of attorneys' fees awarded as fair and reasonable; and

(j) the attorneys' fees and expenses awarded are fair and reasonable and consistent with awards in similar cases within the Ninth Circuit.

IT IS SO ORDERED.

DATED: November 21, 2022

THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

Exhibit 9

Sylebra Capital Partners Master Fund LTD, et al. v. Everbridge, Inc. et al.

SUMMARY OF LODESTARS AND EXPENSES

FIRM	HOURS	LODESTAR CURRENT RATES	LODESTAR HISTORICAL RATES	EXPENSES
Labaton Keller Sucharow LLP	16,406.1	$9,984,902.50	$9,368,426.00	$400,960.73
Robbins Geller Rudman & Dowd LLP	641.4	$622,745.00	$611,694.50	$53,065.38
TOTALS	**17,047.5**	**$10,607,647.50**	**$9,980,120.50**	**$454,026.11**

Exhibit 10

Position	Seq#	Firms	Count	Low	25th Percentile	Median	75th Percentile	High
2025								
Partners								
	1)	Akin Gump Strauss Hauer & Feld LLP	5	$2,250	$2,495	$2,495	$2,495	$2,495
	2)	Davis Polk & Wardwell LLP	11	$2,610	$2,610	$2,645	$2,645	$2,645
	3)	Jones Day	6	$1,237	$1,406	$1,620	$1,766	$1,850
	4)	Kirkland & Ellis LLP	263	$1,070	$1,665	$1,845	$2,210	$2,675
	5)	Latham & Watkins LLP	24	$1,510	$1,765	$1,846	$2,052	$2,466
	6)	Milbank LLP	24	$1,695	$1,948	$2,245	$2,348	$2,475
	7)	Morrison & Foerster LLP	19	$1,600	$1,738	$1,850	$2,050	$2,200
	8)	Paul Hastings LLP	9	$1,175	$2,010	$2,025	$2,175	$2,520
	9)	Paul, Weiss, Rifkind, Wharton & Garrison LLP	7	$2,245	$2,298	$2,350	$2,595	$2,595
	10)	Proskauer Rose LLP	8	$1,705	$1,830	$2,155	$2,346	$2,505
	11)	Quinn Emanuel Urquhart & Sullivan LLP	8	$1,525	$1,731	$1,810	$1,958	$2,115
	12)	Sidley Austin LLP	59	$1,675	$1,790	$1,870	$1,950	$2,530
	13)	Skadden, Arps, Slate, Meagher & Flom LLP	8	$1,995	$2,089	$2,120	$2,281	$2,375
	14)	Willkie Farr & Gallagher LLP	3	$1,625	$1,988	$2,350	$2,425	$2,500
Of Counsel								
	1)	Akin Gump Strauss Hauer & Feld LLP	6	$1,495	$1,556	$1,600	$1,700	$1,800
	2)	Davis Polk & Wardwell LLP	11	$1,830	$2,040	$2,040	$2,040	$2,645
	3)	Jones Day	1	$923	$923	$923	$923	$923
	4)	Kirkland & Ellis LLP	1	$1,895	$1,895	$1,895	$1,895	$1,895
	5)	Latham & Watkins LLP	6	$1,674	$1,713	$1,770	$1,798	$1,860
	6)	Milbank LLP	12	$1,575	$1,575	$1,735	$1,735	$1,975
	7)	Morrison & Foerster LLP	3	$1,425	$1,425	$1,425	$1,700	$1,975
	8)	Paul, Weiss, Rifkind, Wharton & Garrison LLP	1	$2,595	$2,595	$2,595	$2,595	$2,595
	9)	Proskauer Rose LLP	1	$1,690	$1,690	$1,690	$1,690	$1,690
	10)	Quinn Emanuel Urquhart & Sullivan LLP	4	$1,465	$1,660	$1,750	$1,786	$1,820
	11)	Sidley Austin LLP	6	$1,570	$1,570	$1,570	$1,623	$1,790
	12)	Skadden, Arps, Slate, Meagher & Flom LLP	3	$1,580	$1,688	$1,795	$2,135	$2,475
	13)	Willkie Farr & Gallagher LLP	1	$1,650	$1,650	$1,650	$1,650	$1,650
Associates								
	1)	Akin Gump Strauss Hauer & Feld LLP	8	$895	$970	$995	$1,120	$1,310
	2)	Davis Polk & Wardwell LLP	27	$965	$1,670	$1,760	$1,780	$1,780
	3)	Jones Day	9	$517	$653	$700	$850	$950
	4)	Kirkland & Ellis LLP	407	$723	$975	$1,095	$1,324	$1,625
	5)	Latham & Watkins LLP	33	$760	$975	$1,230	$1,465	$1,630
	6)	Milbank LLP	58	$575	$1,125	$1,255	$1,398	$1,735
	7)	Morrison & Foerster LLP	21	$795	$925	$1,180	$1,285	$1,330
	8)	Paul Hastings LLP	12	$895	$1,113	$1,460	$1,501	$1,590
	9)	Paul, Weiss, Rifkind, Wharton & Garrison LLP	14	$975	$1,470	$1,533	$1,690	$2,445
	10)	Proskauer Rose LLP	11	$1,045	$1,123	$1,360	$1,413	$1,560
	11)	Quinn Emanuel Urquhart & Sullivan LLP	16	$885	$1,245	$1,465	$1,560	$1,665
	12)	Sidley Austin LLP	142	$835	$835	$1,045	$1,355	$1,530
	13)	Skadden, Arps, Slate, Meagher & Flom LLP	17	$745	$1,280	$1,430	$1,560	$1,685
	14)	Willkie Farr & Gallagher LLP	3	$720	$973	$1,225	$1,363	$1,500
Paralegals								
	1)	Akin Gump Strauss Hauer & Feld LLP	6	$355	$476	$498	$515	$555
	2)	Davis Polk & Wardwell LLP	5	$505	$505	$515	$515	$515
	3)	Kirkland & Ellis LLP	62	$355	$425	$495	$525	$685
	4)	Latham & Watkins LLP	8	$400	$488	$530	$581	$615
	5)	Milbank LLP	1	$475	$475	$475	$475	$475
	6)	Morrison & Foerster LLP	4	$390	$390	$443	$518	$585
	7)	Paul Hastings LLP	2	$400	$413	$425	$438	$450
	8)	Paul, Weiss, Rifkind, Wharton & Garrison LLP	6	$490	$490	$490	$516	$560
	9)	Proskauer Rose LLP	3	$485	$490	$495	$495	$495
	10)	Quinn Emanuel Urquhart & Sullivan LLP	3	$455	$475	$495	$503	$510
	11)	Sidley Austin LLP	25	$370	$400	$525	$600	$650
	12)	Skadden, Arps, Slate, Meagher & Flom LLP	4	$550	$550	$550	$558	$580
	13)	Willkie Farr & Gallagher LLP	2	$380	$433	$485	$538	$590
Law Clerk								
	1)	Davis Polk & Wardwell LLP	7	$1,065	$1,065	$1,065	$1,065	$1,065
	2)	Quinn Emanuel Urquhart & Sullivan LLP	2	$645	$775	$905	$1,035	$1,165
	3)	Sidley Austin LLP	13	$505	$835	$835	$835	$835
	4)	Willkie Farr & Gallagher LLP	2	$625	$625	$625	$625	$625
Staff Attorney								
	1)	Akin Gump Strauss Hauer & Feld LLP	1	$850	$850	$850	$850	$850
	2)	Jones Day	1	$607	$607	$607	$607	$607
	3)	Milbank LLP	14	$350	$350	$350	$350	$350

Position	Firms	Count	Low		25th Percentile		Median		75th Percentile		High	
2025			Rate	(%Diff.)	Rate	(%Diff.)	Rate	(%Diff.)	Rate	(%Diff.)	Rate	(%Diff.)
All Partners												
	All Firms Sampled	454	$1,070	(+34%)	$1,710	(+85%)	$1,895	(+80%)	$2,245	(+102%)	$2,675	(+95%)
	Labaton Keller Sucharow LLP	**27**	**$800**		**$925**		**$1,050**		**$1,113**		**$1,375**	
Senior Partners												
	All Firms Sampled	322	$1,145	(+39%)	$1,835	(+82%)	$2,050	(+91%)	$2,295	(+104%)	$2,675	(+95%)
	Labaton Keller Sucharow LLP	**22**	**$825**		**$1,006**		**$1,075**		**$1,125**		**$1,375**	
Mid-Level Partners												
	All Firms Sampled	34	$1,555	(+88%)	$1,618	(+90%)	$1,710	(+95%)	$1,968	(+125%)	$2,610	(+198%)
	Labaton Keller Sucharow LLP	**3**	**$825**		**$850**		**$875**		**$875**		**$875**	
Junior Partners												
	All Firms Sampled	98	$1,070	(+34%)	$1,575	(+97%)	$1,695	(+112%)	$1,735	(+117%)	$2,645	(+231%)
	Labaton Keller Sucharow LLP	**2**	**$800**		**$800**		**$800**		**$800**		**$800**	
Of Counsel												
	All Firms Sampled	56	$923	(+42%)	$1,575	(+110%)	$1,735	(+117%)	$1,915	(+125%)	$2,645	(+152%)
	Labaton Keller Sucharow LLP	**13**	**$650**		**$750**		**$800**		**$850**		**$1,050**	
All Associates												
	All Firms Sampled	778	$517	(+48%)	$975	(+86%)	$1,155	(+110%)	$1,375	(+124%)	$2,445	(+249%)
	Labaton Keller Sucharow LLP	**47**	**$350**		**$525**		**$550**		**$613**		**$700**	
Senior Associates												
	All Firms Sampled	158	$720	(+25%)	$1,330	(+122%)	$1,465	(+130%)	$1,524	(+134%)	$2,445	(+249%)
	Labaton Keller Sucharow LLP	**18**	**$575**		**$600**		**$638**		**$650**		**$700**	
Mid-Level Associates												
	All Firms Sampled	157	$595	(+19%)	$1,225	(+123%)	$1,345	(+145%)	$1,375	(+150%)	$1,780	(+224%)
	Labaton Keller Sucharow LLP	**16**	**$500**		**$550**		**$550**		**$550**		**$550**	
Junior Associates												
	All Firms Sampled	415	$517	(+48%)	$880	(+151%)	$985	(+181%)	$1,095	(+109%)	$1,735	(+230%)
	Labaton Keller Sucharow LLP	**13**	**$350**		**$350**		**$350**		**$525**		**$525**	
Paralegals												
	All Firms Sampled	131	$355	(+58%)	$435	(+9%)	$495	(+24%)	$550	(+33%)	$685	(+49%)
	Labaton Keller Sucharow LLP	**20**	**$225**		**$400**		**$400**		**$415**		**$460**	
Staff Attorneys												
	All Firms Sampled	16	$350	(+1%)	$350	(-7%)	$350	(-18%)	$350	(-26%)	$850	(+70%)
	Labaton Keller Sucharow LLP	**134**	**$345**		**$375**		**$425**		**$475**		**$500**	
Investigators												
	All Firms Sampled	0	$0	(+0%)	$0	(+0%)	$0	(+0%)	$0	(+0%)	$0	(+0%)
	Labaton Keller Sucharow LLP	**8**	**$165**		**$419**		**$500**		**$506**		**$525**	
Law Clerks												
	All Firms Sampled	24	$505	(+102%)	$835	(+204%)	$835	(+204%)	$1,065	(+255%)	$1,165	(+79%)
	Labaton Keller Sucharow LLP	**14**	**$250**		**$275**		**$275**		**$300**		**$650**	