

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND
P. DOLAN, MARK T. GREENQUIST,
AND MICHAEL SWADE

Defendants.

Case No. 1:18-cv-12344-GAO

**JOINT DECLARATION OF GARTH A. SPENCER AND JACOB A. GOLDBERG IN
SUPPORT OF (I) PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT, CLASS CERTIFICATION, AND PLAN OF ALLOCATION;
AND (II) LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF LITIGATION EXPENSES, AND AWARDS TO PLAINTIFFS**

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11	Edward Flores and Svetlana Starykh, Recent Trends in Securities Class Action Litigation: 2023 Full-Year Review (NERA Jan. 23, 2024)
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We, Jacob A. Goldberg and Garth A. Spencer, pursuant to 28 U.S.C. § 1746, declare as follows:

Jacob A. Goldberg is a partner at the Rosen Law Firm, P.A (“Rosen”) which serves as co-Lead Counsel, along with Glancy Prongay & Murray LLP (“GPM,” and, with Rosen, “Lead Counsel”) for the Settlement Class and for the Court-appointed Lead Plaintiffs Gary Williams and Guiseppe Veleno, and Named Plaintiff Ron Miller (collectively, “Plaintiffs) in this Action.¹ Garth A. Spencer is a partner with GPM. We make this declaration in support of (a) Plaintiffs’ 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 Reimbursement of Litigation Expenses (referred to herein as the “Fee and Expense Application”), which includes Plaintiffs’ request pursuant to the Private Securities Litigation Reform Act of 1995 (“PLSRA”) for an award for their costs, including lost wages, incurred in connection with their representation of the Settlement Class. We have personal knowledge of the matters stated herein, and if called upon each of us could and would competently testify thereto under oath.

I. INTRODUCTION

1. Plaintiffs and their counsel have achieved an excellent settlement on behalf of the Settlement Class that resolves all claims against the Defendants.² The Settlement provides for the payment of \$4,500,000 in cash (the “Settlement Amount”) to a common fund for the benefit of the Settlement Class, in exchange for the Settlement Class’s release of claims (*see* Released

¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated July 21, 2023 (“Stipulation”). Dkt. No. 122-1.

² “Defendants” are Sonus Networks, Inc. (n/k/a Ribbon Communications, Inc.) (“Sonus”), and Raymond P. Dolan, Mark T. Greenquist, and Michael Swade (collectively, “Individual Defendants”; together with Sonus, “Defendants”; and together with Plaintiffs and Sonus, “Parties”).

Plaintiffs' Claims, at ¶1(nn) of the Stipulation). The Settlement was achieved after hard-fought litigation, substantial document production, Plaintiffs' depositions, and extensive arm's-length settlement negotiations under the auspices of the Honorable David Geronemus of JAMS, a highly experienced mediator.

2. For the reasons set forth below—including the results obtained in the face of the serious risks that Plaintiffs faced in proving scienter, materiality, loss causation, and damages in this case (*see* ¶¶23-33, *infra*)—We respectfully submit that the Settlement is fair, reasonable, and adequate, and in the best interests of the Settlement Class. For example, despite the very significant litigation risks, the \$4,500,000 million recovery represents 17% of the maximum recoverable damages—a percentage that compares extremely favorably to the median recovery in comparably-sized securities class actions in 2023 (the most recent year for which data is available). *See* ¶21, *infra*.

3. The Settlement is the culmination of more than 4 years of hard-fought litigation by Plaintiffs' Counsel, which included, among other things: (a) an extensive investigation into the Settlement Class's claims, including collection and review of Sonus's publicly available documents and interviews of dozens of former Sonus employees; (b) drafting the amended complaint (Dkt. No. 44); (c) drafting the successful opposition to Defendants' motion to dismiss (Dkt. Nos. 48-49); (d) review and analysis of more than 40,000 pages of documents produced by Defendants and by the SEC, including transcripts of testimony given by Sonus employees in a factually related SEC investigation; (e) preparing for and defending the Plaintiffs' depositions; (f) consultation with Plaintiffs' damages expert; (g) preparation of a mediation brief addressing liability, loss causation, and damages along with accompanying exhibits, and participation in a successful all-day mediation session under the supervision of renowned mediator David

Geronemus; (h) negotiating and memorializing the terms of the Settlement contained in the term sheet; and (j) preparing the Stipulation of Settlement and related exhibits, and thereafter obtaining the Court's preliminary approval.

4. By order dated October 19, 2023 ("Preliminary Approval Order") (Dkt. No. 133), the Court preliminarily approved the Settlement, preliminarily certified the Settlement Class for settlement purposes, and approved the issuance of notice to the Settlement Class, including: (i) the mailing of the Postcard Notice ("Postcard Notice"); (ii) the posting of the long-form Notice and the Proof of Claim and Release Form ("Claim Form") to the Settlement Website (<https://www.strategicclaims.net/sonus/>); and (iii) the publication of the Summary Notice. Accordingly, 18,964 Settlement Class Members have been mailed copies of the Postcard Notice or emailed a link to the Notice and Claim Form on the Settlement Website. In addition, the Notice and Claim Form have been posted on the dedicated Settlement Website. Finally, the Summary Notice was duly published in *Investor's Business Daily* and over the *PR Newswire* on November 27, 2023. See Exhibit 1 attached hereto, Declaration of Margery Craig Regarding (A) Mailing of the Postcard Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections ("Craig Decl.") at ¶¶8, 11, 13.³

5. The Postcard Notice and long-form Notice (together, the "Notices") advised Settlement Class Members of the material terms of the Settlement and of their rights to: (a) participate in the Settlement; (b) exclude themselves from the Settlement Class; and/or (c) object to any part of the Settlement, the proposed Plan of Allocation, Lead Counsel's request for total attorneys' fees in the amount of 33⅓% of the Settlement Fund and reimbursement of their

³ This declaration, and all other papers filed in support of the final approval motion and the separate Fee and Expense Application, will be posted and made available for public review on the Settlement Website.

Litigation Expenses of up to \$140,000. The Postcard Notice also directed Settlement Class Members to the Notice posted on the Settlement Website outlining the procedures to be followed to exercise those rights.

6. The Court-ordered deadline for filing any objections or requests for exclusion is April 3, 2024. As of March 18, 2024, no objections to the Settlement, Plan of Allocation, or Lead Counsel's request for attorneys' fees and reimbursement of Litigation Expenses have been received or, to our knowledge, filed with the Court. *See* Craig Decl. at ¶15. Similarly, as of March 18, 2024, no requests to be excluded from the Settlement Class have been received by the Claims Administrator. *Id.* at ¶14. To the extent any objections and requests for exclusion are subsequently received, Plaintiffs will address them collectively in their reply papers to be filed on April 17, 2024, as provided for in the Preliminary Approval Order.

II. PROSECUTION OF THE ACTION

A. Background

7. The Complaint alleged that Defendants knowingly misled investors twice in early 2015 about the Company's Q1 2015 revenue forecast. On January 8, 2015, Defendants expressed comfort with analysts' estimates of \$74 million revenue, even as they expressed in private that they had "no path" to achieve that projection because Sonus had cannibalized the Q1 2015 pipeline to achieve its revenue forecast for the fourth quarter of 2014 ("Q4 2014"). Sonus was therefore at least \$20 million short in "commits" for Q1 2015 deals. On February 18, 2015, Defendants knowingly misled again, this time themselves forecasting Q1 2015 revenue of \$74 million when they knew that Sonus could not achieve that forecast.

8. On March 24, 2015, Defendants disclosed that Sonus would miss its revenue projection of \$74 million for the first quarter of 2015 ("Q1 2015") by \$24-27 million or 32%-36%. In response, Sonus's stock price fell by 33%, damaging Class members. The Securities and

Exchange Commission (“SEC”) investigated Sonus’s Q1 2015 forecasts and forecast shortfall, executed a cease-and-desist order (“SEC Order”) with Sonus and Defendants Greenquist and Swade, fined Sonus \$1.9 million, and fined Greenquist and Swade a total of \$70 thousand.

B. Commencement Of The Instant Action

9. On November 8, 2018, Named Plaintiff Ron Miller initiated this Action by filing a class action complaint. (Dkt. No. 1).

10. By Order dated June 21, 2019, the Court appointed Giuseppe Veleno and Gary Williams as Lead Plaintiffs, approved Lead Plaintiffs’ selection of Glancy Prongay & Murray LLP and The Rosen Law Firm, P.A. as “Lead Counsel,” and approved Lead Plaintiffs’ selection of Andrews DeValerio LLP to serve as “Liaison Counsel.” (Dkt. No. 41).

C. Lead Counsel’s Investigation And Filing Of The Complaint

11. Following the filing of the Action, Lead Counsel conducted a further thorough investigation into Sonus and the alleged fraud in connection with researching, preparing and drafting the operative Amended Class Action Complaint for Violations of the Federal Securities Laws (“Complaint”). (Dkt. No. 44). This investigation included, among other things, a review and analysis of: (i) Sonus’s public Securities and Exchange Commission (“SEC”) filings; (ii) public reports and news articles; (iii) research reports by securities and financial analysts; (iv) transcripts of Sonus’s investor calls; and (v) interviews with former employees, and (vi) other publicly available material and data. As part of this investigation, Lead Counsel hired an experienced private investigator to locate and conduct interviews with numerous former Sonus employees, and Lead Counsel consulted with experts in the fields of loss causation and damages.

12. On July 19, 2019, Lead Plaintiffs and Named Plaintiff Ron Miller filed the Complaint. The Complaint asserted claims for securities fraud under Section 10(b) of the Securities Exchange Act of 1934 (the “Exchange Act”) and Rule 10b-5 promulgated thereunder

against Defendants, and under Section 20(a) of the Exchange Act against the Individual Defendants. The Complaint sought to pursue remedies for the alleged Exchange Act violations on behalf of all purchasers of Sonus securities during an alleged class period of January 8, 2015 through March 24, 2015, inclusive.

D. Defendants' Motion To Dismiss The Complaint And Plaintiffs' Opposition

13. On August 30, 2019, Defendants moved to dismiss the Complaint. (Dkt. Nos. 48-49). They argued, among other things, that: (i) Plaintiffs' Exchange Act claims were barred by the statute of limitations; (ii) Plaintiffs did not allege scienter, *i.e.* that Defendants knowingly issued a false revenue projection for Q1 2015; and (iii) Defendants' public statements were protected by the PSLRA safe harbor.

14. On October 4, 2019, Plaintiffs filed their opposition papers. (Dkt. No. 50). Defendants filed a reply in support of dismissal on November 1, 2019. (Dkt. No. 51).

15. By Order dated October 20, 2022, the Court denied Defendants' motion to dismiss in its entirety. (Dkt. No. 71); *Miller v. Sonus Networks, Inc.*, 2022 WL 11804021 (D. Mass. Oct. 20, 2022). The Court ruled both Defendants' January 8, 2015, and February 18, 2015, statements actionable. *Id.* at *4-5. The Court rejected Defendants' statute of limitations argument. *Id.* at *4. Finally, the Court ruled Plaintiffs adequately pleaded that Defendants Dolan, Greenquist, and Swade were control persons under Exchange Act section 20(a). *Id.* at *6.

E. The Parties Conduct Discovery

16. The Parties conducted discovery, exchanging and replying to requests for production of documents and to interrogatories. In addition, Plaintiffs issued third-party subpoenas. Defendants produced over 11,500 documents (spanning 40,607 pages) including transcripts of testimony given by Sonus employees in a factually related SEC investigation.

Plaintiffs responded to Defendants' discovery requests, produced documents, answered interrogatories, and sat for depositions.

F. Mediation Before JAMS Mediator David Geronemus

17. The Parties mediated this Action before JAMS mediator David Geronemus. In advance of the mediation, the Parties exchanged, and provided to Mr. Geronemus, detailed mediation statements and exhibits, addressing both liability and damages. On June 13, 2023, the Parties participated in an in-person, all-day mediation. During the mediation the Parties agreed in principle to settle the Action, as memorialized in a term sheet ("Term Sheet"), executed on June 16, 2023. The Term Sheet sets forth, among other things, the Parties' agreement to settle and release all claims asserted against Defendants in the Action in return for a cash payment on behalf of Sonus of \$4.5 million for the benefit of the Settlement Class, subject to certain terms and conditions and the execution of a customary Stipulation and Agreement of Settlement, and related papers.

18. On July 21, 2023, the Parties executed the Stipulation.

G. Preliminary Approval Of The Settlement

19. On July 25, 2023, Plaintiffs filed their motion for preliminary approval of the Settlement. (Dkt. Nos. 123). On October 18, 2023, the Court held a hearing on the motion for preliminary approval. (Dkt. No. 131). On October 19, 2023, the Court entered the Preliminary Approval Order directing notice of the Settlement to be disseminated to prospective Settlement Class Members. (Dkt. No. 133).

20. The Settlement Class is defined as:

all persons and entities that purchased or otherwise acquired the publicly traded Sonus common stock, and/or purchased or otherwise acquired Sonus call options, and/or wrote Sonus put options ("collectively, Sonus Securities"), during the period between January 8, 2015 and March 24, 2015, both dates inclusive ("Settlement Class Period"), and who suffered economic losses as a proximate

result of the alleged wrongdoing. Excluded from the Settlement Class are: (i) persons who suffered no compensable losses; and (ii)(a) Defendants; (b) present and former parents, subsidiaries, assigns, successors, predecessors, and affiliates of Sonus; (c) any person who served as an officer and/or director of Sonus during the Settlement Class Period and their Immediate Family members; (d) any entity in which the Defendants have or had a controlling interest; (e) any trust of which an Individual Defendant is the settler or which is for the benefit of an Individual Defendant and/or member(s) of their immediate families; (f) Defendants' liability insurance carriers; and (g) the legal representatives, heirs, successors, and assigns of any person or entity excluded under provisions (a) through (f) hereof. Also excluded from the Settlement Class are any persons and entities who or which exclude themselves by submitting a request for exclusion that is accepted by the Court.

Preliminary Approval Order, ¶1, Stipulation, ¶1(ss).

III. QUALITY OF THE RESULT ACHIEVED

21. The \$4.5 million Settlement represents an excellent recovery based on available empirical data. Lead Counsel, with the assistance of Plaintiffs' expert, calculated that the \$4.5 million Settlement represents a recovery of roughly 17% of the Settlement Class's maximum recoverable class-wide damages of approximately \$26.8 million using a two-trader model. Defendants, however, would have argued that the Settlement Class's damages was zero. Notably, this recovery is *more than three times* the median recovery for cases of a similar magnitude. *See* Ex. 11 (Edward Flores and Svetlana Starykh, Recent Trends in Securities Class Action Litigation: 2023 Full-Year Review (NERA Jan. 23, 2024) at p. 25, Fig. 21) (median recovery was 5.1% for securities class actions with estimated damages between \$20-\$49 million that settled between January 2014-December 2023).

22. The foregoing numbers, however, tell only part of the story. The result achieved here is even more notable when the significant and real risks of a much smaller recovery (or none at all) are considered if the case had proceeded through an order on class certification, summary judgment, trial, and likely appeal. The facts of this case confirm that the quality, hard work and perseverance of Plaintiffs' Counsel led to an excellent result for the Settlement Class.

IV. RISKS OF CONTINUED LITIGATION

23. The Settlement provides an immediate and certain benefit to the Settlement Class in the form of a cash payment of \$4,500,000. There were significant risks, however, that Plaintiffs and the class might recover substantially less than the Settlement Amount—or no recovery at all—if the case proceeded through additional years of litigation to a potentially litigated verdict. Defendants have arguments with respect to liability, scienter, loss causation, and damages in this case.

A. Risks Of Establishing Liability

24. This Action presented a number of substantial risks to establishing liability and scienter. Defendants argued that Plaintiffs' claims were barred by the applicable two-year statute of limitations because their counsel filed a related case against Sonus in May 2016, and so, in Defendants' view, the statute of limitations began to run at that time. *See* Dkt. No. 49 at 6-13. While the Court rejected this argument in the context of Defendants' motion to dismiss Defendants likely would have raised this point again on summary judgment.

25. With respect to liability, Plaintiffs faced substantial risks and uncertainties in proving that Defendants acted with scienter. Defendants argued, *inter alia*, that their expression of comfort with analyst estimates was non-actionable puffery, and that all of the challenged statements were forward-looking and so protected by the PSLRA safe harbor. *See* Dkt. No. 49 at 13-27. Defendants further argued that neither challenged statement was misleading because the

first was only based on a top-down view of market opportunities, and the second was based on specific potential sales that they reasonably thought they could achieve. *See id.*

26. Plaintiffs would also have faced significant obstacles in proving that the Defendants acted with scienter. In particular, Defendants argued that they had not engaged in insider stock sales, and that there was no plausible motive for them to knowingly overstate revenue projections that would be revealed as false in only a few weeks. Defendants also pointed to the results of the SEC investigation into Sonus, wherein the SEC ultimately did not pursue scienter-based claims, but rather negligence-based claims. In short, proving liability represented a major risk for Plaintiffs.

B. Risks Of Establishing Loss Causation And Damages

27. Even assuming that Plaintiffs overcame the above risks and successfully established liability, Plaintiffs would still have confronted considerable challenges in establishing loss causation and damages. *See Dura Pharm., Inc. v. Broudo*, 544 U.S. 336, 345-46 (2005) (plaintiffs bear the burden of proving “that the defendant’s misrepresentations ‘caused the loss for which the plaintiff seeks to recover’”).

28. At summary judgment and at trial, Defendants likely would have argued that some or all of the price decline in Sonus’s stock on March 24, 2015 was caused by factors other than misrepresentations. For example, Defendants likely would have argued that their reduced guidance was due in substantial part to customer orders previously expected in the first quarter of 2015 being delayed or cancelled for unforeseen reasons. Defendants likely would have argued that Plaintiffs had to disaggregate such confounding news from the overall March 24, 2015 price decline.

29. Plaintiffs would have to proffer expert testimony to prove: (i) the true value of

Sonus stock had there been no alleged material misstatements during the class period; (ii) the amount by which Sonus shares were inflated by the alleged material misstatements; and (iii) the amount of inflation removed by the disclosures of the alleged true facts. Defendants would have presented their own damages expert(s) to argue conflicting conclusions and reason(s) for Sonus's share price decline, requiring a jury to decide the "battle of the experts"—an intrinsically expensive and unpredictable process. Courts have recognized that such a "battle of experts" is a significant litigation risk, and weighs in favor of approving a settlement. *Tyco*, 535 F. Supp. 2d at 260-61.

30. In addition, Plaintiffs would have argued a leakage theory to include in damages stock price falls in the two days preceding the corrective disclosure on March 24, 2015. Defendants almost certainly would have attacked this theory and argued that no corrective disclosures occurred on those dates. If any of Defendants' damages or loss causation arguments were accepted, then the Settlement Class's damages could have been significantly reduced or eliminated.

31. While Plaintiffs maintain that there are viable responses to each of Defendants' arguments, there is no guarantee that Plaintiffs would have prevailed on these disputes at summary judgment, at trial, or following an inevitable appeal. Accordingly, in the absence of the Settlement, members of the Settlement Class potentially could have been left with a fraction of the Settlement Amount, or possibly no recovery at all.

C. Other Risks

32. In addition to the risks discussed above, Plaintiffs also faced the risk of any judgment in their favor being overturned or lessened on appeal. This process could extend for years.

33. Against the backdrop of these risks, the Settlement represents a favorable recovery for the Class. Given these significant litigation risks, Plaintiffs and Lead Counsel believe that the Settlement represents an excellent result for the Settlement Class.

V. PLAINTIFFS' COMPLIANCE WITH THE COURT'S PRELIMINARY APPROVAL ORDER REQUIRING ISSUANCE OF NOTICE

34. The Court's Preliminary Approval Order directed that notice be disseminated to the Settlement Class. The Preliminary Approval Order also set an April 3, 2024 deadline for Settlement Class Members to submit objections to the Settlement, the Plan of Allocation and/or the Fee and Expense Application, or to request exclusion from the Settlement Class, and set a settlement hearing date of April 24, 2024, at 2:00 p.m.

35. Pursuant to the Preliminary Approval Order, Lead Counsel instructed Strategic Claims Services ("SCS"), the Court-approved Claims Administrator, to begin disseminating copies of the Postcard Notice by mail, post the Notice and Claim Form on the Settlement Website, and to publish the Summary Notice. The Notice posted on the Settlement Website contains, among other things, a description of the Action; the definition of the Settlement Class; a summary of the terms of the Settlement and the proposed Plan of Allocation; and a description of Settlement Class Members' rights to participate in the Settlement, object to the Settlement, the Plan of Allocation and/or the Fee and Expense Application, or exclude themselves from the Settlement Class. The Notices also inform Settlement Class Members of Plaintiffs' Counsel's intent to apply for an award of attorneys' fees in an amount not to exceed 33 $\frac{1}{3}$ % of the Settlement Fund, and for reimbursement of Litigation Expenses in an amount not to exceed \$140,000.

36. To disseminate the Postcard Notice, SCS obtained information from Sonus, and from banks, brokers and other nominees regarding the names and addresses of potential

Settlement Class Members. *See* Craig Decl. at ¶¶4-7, 9.

37. In total, 18,964 potential Settlement Class Members have either been mailed the Postcard Notice or emailed a link to the Notice and Claim Form on the Settlement Website. *See id.* at ¶8.

38. On November 27, 2023, in accordance with the Preliminary Approval Order, SCS caused the Summary Notice to be published once in *Investor's Business Daily* and to be transmitted once over the *PR Newswire*. *See id.* at ¶11.

39. Lead Counsel also caused SCS to establish a dedicated Settlement Website to provide potential Settlement Class Members with information concerning the Settlement and access to downloadable copies of the Notice and Claim Form, as well as copies of the Postcard Notice, Complaint, Stipulation, and Preliminary Approval Order. *See id.* at ¶13.

40. As set forth above, the deadline for Settlement Class Members to file objections to the Settlement, the Plan of Allocation and/or the Fee and Expense Application, or to request exclusion from the Settlement Class, is April 3, 2024. As of March 18, 2024, no requests for exclusion have been received by SCS (*see id.* at ¶14), and to our knowledge, no objections to the Settlement, the Plan of Allocation or Lead Counsel's Fee and Expense Application have been filed with the Court or received by SCS. *Id.* at ¶15. Pursuant to the Court's October 19, 2023 Preliminary Approval Order, Lead Counsel will file reply papers on April 17, 2024 that will address any requests for exclusion and any objections that may be received.

VI. THE PLAN OF ALLOCATION

41. Pursuant to the Preliminary Approval Order, and as set forth in the Notice, all Settlement Class Members who wanted to participate in the distribution of the Net Settlement Fund had to submit a valid Claim Form with all required information postmarked no later than March 15, 2024.

42. The Plan of Allocation proposed by Plaintiffs and Lead Counsel, if approved, will govern how the Net Settlement Fund will be distributed among Authorized Claimants. The proposed Plan of Allocation is designed to achieve an equitable and rational distribution of the Net Settlement Fund. However, the Plan of Allocation is not a formal damage analysis and the calculations made pursuant to it are not intended to be estimates of, nor indicative of, the amounts that Settlement Class Members might have been able to recover after a trial.

43. Lead Counsel developed the Plan of Allocation in consultation with Plaintiffs' damages expert. In developing the Plan of Allocation, Plaintiffs' damages expert calculated the amount of estimated alleged artificial inflation in the per share closing prices of Sonus common stock that allegedly was proximately caused by Defendants' alleged false or misleading statements and omissions. In calculating the estimated artificial inflation caused by Defendants' alleged misrepresentations and omissions, Plaintiffs' damages expert considered the price changes in Sonus common stock that occurred on March 20, 2015, March 23, 2015, and March 24, 2015, and adjusted the price changes observed on those days for changes that were attributable to market or industry forces.

44. Under the Plan of Allocation, a "Recognized Loss Amount" will be calculated for each purchase of Sonus Securities during the Settlement Class Period (*i.e.*, from January 8, 2015 through and including March 24, 2015) that is listed in the Claim Form and for which adequate

documentation is provided.⁴ The calculation of Recognized Loss Amounts will depend upon several factors, including how many Sonus Securities the Claimant purchased, when the Sonus Securities were bought, acquired or sold (or if they were still held at the end of Settlement Class Period), and the purchase price and sales price (if sold). In general, the Recognized Loss Amount calculated will be the difference between the estimated artificial inflation on date of purchase and the estimated artificial inflation on date of sale (with certain adjustments based on the 90-day average price following the end of the class period if the Securities was still held as of the end of the Settlement Class Period), or the difference between the actual purchase price and sales price of the Securities, whichever is less.

45. Claimants who purchased Sonus Securities during the Settlement Class Period and sold those Securities before the corrective first alleged corrective disclosure impacted the Company's share price (on March 20, 2015) will have no Recognized Loss Amount for those transactions. The Plan of Allocation also incorporates the "Lookback Period" damage claim ceiling provisions of the Private Securities Litigation Reform Act of 1995. Recognized Loss Amounts for shares of Sonus common stock sold during the 90-day period after the end of the Settlement Class Period or still held at the end of trading on June 22, 2015, the end of the 90-day period, are also limited by the difference between the purchase price and the average closing price of Sonus common stock during that period, consistent with provisions of the PSLRA, 15 U.S.C. § 78u-4(e).

⁴ Recognized Loss Amounts will likewise be calculated for Sonus Put Options sold (written) during the Settlement Class Period. *See* Craig Decl., Ex. C at p. 10. Sonus Call and Put Option trading accounted for less than 1% of total dollar trading volume for Sonus Securities during the Settlement Class Period. Consequently, claims for Sonus Call and Put Option transactions are allotted 1% of the Settlement pursuant to the Plan of Allocation. *See id.* at p. 13, ¶13 and n. 8.

46. The sum of the Recognized Loss Amounts for all of a Claimant's purchases of Sonus Securities during the Settlement Class Period is the Claimant's "Recognized Claim" and the Net Settlement Fund will be allocated to Authorized Claimants on a *pro rata* basis based on the relative size of their Recognized Claims. *See* Craig Decl., Ex. C at p. 10-16 (Notice provisions regarding the Plan of Allocation).

47. In sum, the Plan of Allocation was designed to fairly and equitably allocate the proceeds of the Net Settlement Fund among Settlement Class Members based on the losses they suffered on transactions in Sonus Securities that were attributable to the conduct alleged in the Complaint. Accordingly, Lead Counsel respectfully submit that the Plan of Allocation is fair and reasonable and should be approved by the Court.

VII. LEAD COUNSEL'S APPLICATION FOR AN AWARD OF ATTORNEYS' FEES

48. In addition to seeking final approval of the Settlement and Plan of Allocation, Lead Counsel is applying to the Court for an award of attorneys' fees on behalf of all Plaintiffs' Counsel equal to 33 $\frac{1}{3}$ % of the Settlement Fund (or \$1,500,000, plus interest earned at the same rate as the Settlement Fund). As discussed below, the requested 33 $\frac{1}{3}$ % fee represents a fractional (negative) "multiplier" of 0.73 on Plaintiffs' Counsel's combined lodestar of \$2,053,166.75. The legal authorities supporting a 33 $\frac{1}{3}$ % percentage fee are set forth in the accompanying Fee and Expense Application, which is being filed contemporaneously herewith. The primary factual basis for the requested fee are summarized below.

A. Plaintiffs' Endorsement of Lead Counsel's Fee Application

49. Plaintiffs have been expressly advised of Lead Counsel's request for a total fee award of 33 $\frac{1}{3}$ % of the Settlement Fund, and believe it to be fair and reasonable. In coming to this conclusion, each of the Plaintiffs—who have supervised and monitored both the prosecution and the settlement of the Action—have concluded that counsel have earned the requested fee

based on the excellent recovery obtained for the Settlement Class in a case that involved serious risks. *See* Declaration of Lead Plaintiff Gary Williams in Support of: (1) 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 Reimbursement of Litigation Expenses (“Williams Decl.”), attached hereto as Exhibit 2, at ¶¶9-11; Declaration of Lead Plaintiff Giuseppe Veleno in Support of: (1) 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 Reimbursement of Litigation Expenses (“Veleno Decl.”), attached hereto as Exhibit 3, at ¶¶9-11; and Declaration of Named Plaintiff Ron Miller in Support of: (1) 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 Reimbursement of Litigation Expenses (“Miller Decl.”), attached hereto as Exhibit 4.

B. The Work And Experience Of Counsel

50. As previously summarized at ¶3 above, Plaintiffs’ Counsel’s work on this case included, *inter alia*:

- (a) conducting extensive investigation and related review of documents, identification of interviewing of confidential witness, and legal analysis;
- (b) writing and filing the operative Complaint;
- (c) successfully opposing Defendants’ motion to dismiss;
- (d) obtaining from Defendants and the SEC and reviewing and analyzing over 40,000 pages of documents;
- (e) preparing and defending Plaintiffs’ depositions;
- (f) preparing a detailed mediation brief, and participating in a successful full-day in-person mediation before JAMS mediator David Geronemus;
- (g) negotiating the terms of a term sheet, and thereafter negotiating the

comprehensive Stipulation and Agreement of Settlement and related papers;

- (h) preparing the papers in support of, and successfully obtaining, preliminary approval; and
- (i) preparing the papers in support of final approval.

51. Lead Counsel will continue to work towards effectuating the Settlement in the event the Court grants final approval. No additional compensation will be sought for this work.

52. As set forth in the separate fee declarations of Rosen, Glancy, and Andrews DeValerio, attached as Exhibits 8-10 to this Declaration, Plaintiffs' Counsel expended a total of 2,492.35 hours prosecuting this Action, equating to a lodestar of \$2,053,166.75.

53. The hourly rates for the attorneys and professional support staff as stated in Exhibits 8-10 to this Declaration are similar to the rates that have been accepted in other securities or shareholder litigation, and comparable to hourly rates for peer plaintiff and defense firms litigating matters of similar magnitude. *See* Ex. 13 attached hereto (table of peer firm billing rates).

54. The above lodestar number was prepared from time records regularly prepared and maintained by Plaintiffs' Counsel. Time expended on Plaintiffs' Counsel's application for fees and reimbursement of expenses has not been included in this request. Nor does it include any of the time spent on the preparation of the final approval papers, attendance at the final approval hearing, and any further work in overseeing the claims and distribution process.

55. We, along with counsel from Andrews DeValerio, maintained control of and monitored the work performed by lawyers and other personnel on this case. Experienced attorneys at our firms devoted substantial time to this case—*i.e.*, drafting, reviewing, and/or editing all pleadings, court filings, reviewing documents and preparing and serving third-party subpoenas, the mediation statement, and other materials prepared on behalf of Plaintiffs,

communicated with Plaintiffs, engaged with defense counsel on a variety of matters, and were involved in Settlement negotiations and other matters. More junior attorneys and paralegals also worked on matters appropriate to their skill and experience level. Throughout the litigation, we believe Lead Counsel maintained an appropriate level of staffing that avoided unnecessary duplication of effort and ensured the efficient prosecution of this Action.

56. Based on the work performed and the quality of the results achieved, Lead Counsel respectfully submits that a 33⅓% fee is fully merited under the “percentage of the fund” methodology. As set forth below, we also respectfully submit that the requested fee is equally merited after applying a “lodestar multiple crosscheck,” or under the now generally disfavored “traditional” lodestar methodology.

57. The requested 33⅓% attorneys’ fee here (which equates to \$1,500,000, plus interest at the rate earned by the Settlement Fund) represents a 0.73 fractional lodestar multiple compared to the base lodestar value of Plaintiffs’ Counsel’s time. As shown in Lead Counsel’s accompanying Fee and Expense Application, such a multiplier is well within the range of multipliers that courts often award in comparably complex securities class actions. Where (as here) the requested fee amounts to a 0.73 fractional multiplier on Plaintiffs’ Counsel’s total lodestar time, it is also justified under a “lodestar” based methodology.

58. As demonstrated by the firm résumés attached hereto, Lead Counsel and Liaison Counsel, are highly experienced and skilled law firms in the securities litigation field, with a long and successful track record representing investors in such cases. Exs. 5-7. Each firm has a history of successfully prosecuting securities class action cases and complex litigation in federal and state courts throughout the country. We respectfully submit that the Settlement (and its quality) was due to Plaintiffs’ Counsel’s hard work, persistence, and skill—and that Plaintiffs’

Counsel's diligence and the results achieved both fully merit the requested fee.

C. Standing And Caliber Of Defendants' Counsel

59. The quality of the work performed by Plaintiffs' Counsel in attaining the Settlement should also be evaluated in light of the quality of the opposition. Here, Defendants were represented by Wilmer Cutler Pickering Hale and Dorr LLP, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, PC, Morvillo PLLC, Quarles & Brady LLP, Sidley Austin LLP, and Brown Moskowitz & Kallen, P.C., all of which are capable and well respected law firms that effectively represented the interests of their clients throughout this Action. In the face of this experienced and formidable opposition, Plaintiffs' Counsel were nonetheless able to persuade Defendants to settle the case on terms that we believe are favorable to the Settlement Class.

D. The Fully Contingent Nature Of The Representation, And The Importance Of Appropriately Compensating High-Quality Counsel In High-Risk Contingent Securities Cases

60. Plaintiffs' Counsel undertook the prosecution of this case on a fully contingent-fee basis, and as discussed above, they assumed significant risks in bringing the Action.

61. From the outset, Plaintiffs' Counsel understood that they were embarking on a complex and expensive litigation with no guarantee of ever being compensated for the enormous investment of time and money that the case would require. In undertaking this responsibility, they had to ensure that they dedicated sufficient resources to prosecuting the case, and that funds were available to pay staff and cover the out-of-pocket costs that a case of this size can require. With an average lag time of several years for securities cases to conclude—this case being the rule rather than an exception—the financial burden on contingent-fee counsel is far greater than on a firm that is paid on an ongoing basis. Plaintiffs' Counsel have received no compensation during the lengthy course of this litigation, and have incurred substantial out-of-pocket expenses in prosecuting it for the benefit of the Settlement Class.

62. Some of the many specific risks at issue here have already been discussed above. Nonetheless, it bears emphasizing that such risks are not just theoretical. To the contrary, case law confirms that the risk of no recovery in complex securities actions is real, and there are numerous class actions where plaintiffs' attorneys have expended thousands of hours, but received no compensation despite their hard work and expertise. *See, e.g., BankAtlantic Bancorp, Inc. Sec. Litig.*, 2011 WL 1585605, at *24 (S.D. Fla. Apr. 25, 2011) (one of the first favorable jury verdicts related to the subprime scandal thrown out by the court on J.N.O.V. motion after a six week trial); *In re JDS Uniphase Corp. Sec. Litig.*, 2007 WL 4788556 (N.D. Cal. Nov. 27, 2001) (defense verdict after four weeks of trial); *Robbins v. Koger Props., Inc.*, 116 F.3d 1441 (11th Cir. 1997) (jury verdict of \$81 million for lead plaintiffs reversed on appeal and judgment entered for defendant); *Eisenstadt v. Centel Corp.*, 113 F.3d 738 (7th Cir. 1997) (affirming lower court's grant of summary judgment for defendants); *Anixter v. Home-Stake Prod. Co.*, 77 F.3d 1215 (10th Cir. 1996) (overturning securities class action jury verdict for lead plaintiffs in case filed in 1973 and tried in 1988 on the basis of 1994 Supreme Court opinion); *In re Apple Computer Sec. Litig.*, 1991 WL 238298 (N.D. Cal. Sept. 6, 1991) (after class won jury verdict against two individual defendants, court vacated judgment on J.N.O.V. motion); *Backman v. Polaroid Corp.*, 910 F.2d 10 (1st Cir. 1990) (where class won a substantial jury verdict and J.N.O.V. motion was denied, judgment was reversed on appeal and case was dismissed—after 11 years of litigation).

63. Moreover, Lead Counsel know from personal experience that despite the most effective and competent of efforts, success in contingent litigation is never assured. In fact, GPM lost a six week antitrust jury trial in the Northern District of California after five years of litigation, which included many overseas depositions, the expenditure of millions of dollars of

attorney and paralegal time, and the expenditure of more than a million dollars in hard costs. *See In re: Korean Ramen Antitrust Litigation*, Case No. 3:13-cv-04115 (N.D. Cal.). Because the fee to be awarded in this matter is entirely contingent, the only certainty from the outset was that there would be no fee without a successful result, and that such a result would be realized only after a lengthy and difficult effort against Defendants who were represented by pre-eminent law firms.

64. In short, no meaningful fee is guaranteed by virtue of the mere commencement of a class action. It takes hard and diligent work by skilled counsel to develop facts and legal theories that will either persuade defendants to enter into serious settlement negotiations, or succeed at trial.

65. Public policy also favors paying counsel a fair fee that will compensate them for the risk they are assuming on behalf of the class. For this reason, the United States Supreme Court (and countless lower courts) have repeatedly and consistently recognized that the public has a strong interest in having experienced and able counsel enforce the federal securities laws and related regulations designed to protect investors from the pernicious effects of false and misleading statements that are made in connection with the issuance or subsequent purchase or sale of publicly-traded securities. *See, e.g., Amgen, Inc., et al. v. Connecticut Ret. Plans & Trust Funds*, 568 U.S. 455, 478 (2013) (“Congress, the Executive Branch, and this Court . . . have recognized that meritorious private actions to enforce federal antifraud securities laws are an essential supplement to criminal prosecutions and civil enforcement actions brought, respectively, by the Department of Justice and the [SEC]”) (emphasis added, internal quotes and string citation omitted).

66. Indeed, as Congress recognized in passing the PSLRA:

Private securities litigation is an indispensable tool with which defrauded investors can recover their losses without having to rely on government action. Such private lawsuits promote public and global confidence in our capital markets and help to deter wrongdoing and to guarantee that corporate officers, auditors, directors, lawyers and others properly perform their jobs. This legislation seeks to return the securities litigation system to that high standard.

H.R. Conf. Rep. No. 104-369, p. 31 (1995). Simply stated, the SEC, a vital but understaffed agency whose inadequate funding has been the subject of numerous news stories and other accounts in recent years, does not have anywhere near the budget or personnel to ensure enforcement of the securities laws. If the critically important public policy of supplementing SEC enforcement through effective private class action securities litigation is to be carried out, courts should award fees that reward the best plaintiffs' counsel for obtaining decidedly above-average results in such a complex and high-risk area.

67. For all the reasons discussed above and in the accompanying fee brief, we respectfully submit the requested 33 $\frac{1}{3}$ % fee should be approved.

VIII. PLAINTIFFS' COUNSEL'S AND PLAINTIFFS' REQUEST FOR REIMBURSEMENT OF REASONABLE LITIGATION EXPENSES

68. From the outset, Plaintiffs' Counsel knew that they might not recover any of their expenses. They also knew that, even if the case were ultimately successful, reimbursement for expenses would not compensate them for the lost use of the funds advanced to prosecute this case. Accordingly, Plaintiffs' Counsel were motivated to, and did, take steps to minimize expenses whenever practicable where it would not jeopardize the vigorous and efficient prosecution of the case.

69. As set forth in the Rosen, GPM, and Andrews DeValerio Declarations in Support of Lead Counsel's Motion for Attorneys' Fees, Exs. 8-10, Plaintiffs' counsel incurred a total of \$93,355.46 in unreimbursed litigation expenses in connection with prosecuting this Action. According to the declarations submitted by Plaintiffs' counsel, these expenses are reflected on

the respective books and records maintained by each respective Plaintiffs' Counsel firm, which are prepared from expense vouchers, check records, invoices and other source materials, and which accurately record the expenses incurred. Plaintiffs' Counsel's fee and expense schedules also break down their respective expenses incurred by category (e.g., experts' fees, mediation fees, travel, document hosting costs, electronic legal research costs, copying costs, and postage expenses) for which Plaintiffs' Counsel seek reimbursement. At each of Plaintiffs' counsel's firms, such expense items are billed separately by each Plaintiffs' Counsel, and are not duplicated in the firms' billing rates.

70. One of the largest component of expenses, \$32,805.00, or approximately 35% of the total expenses, was expended on the retention of experts in the field of damages, loss causation and market efficiency, and plan of allocation. The experts were consulted at different points throughout the litigation, including on matters related to the preparation of the amended complaints, on matters relating to the negotiation of the Settlement, and on preparation of the proposed Plan of Allocation.

71. Another large component of expenses, \$9,278.78, or approximately 8% of the total expenses, was expended primarily on retention of an experienced private investigator who, *inter alia*, discovered and contacted former employees who had information relevant and valuable to Plaintiffs' claims in this Action.

72. Other substantial expenses included \$6,460.40 for the combined costs of on-line legal and factual research that was crucial to researching the claims and opposing Defendants' motions to dismiss, or approximately 7% of the total expenses; \$14,618.12 in mediation fees paid to JAMS for the services of David Geronemus, or approximately 16% of the total expenses; \$14,487.63 for transportation expenses, or approximately 15% of the total expenses; and

\$6,460.40 for online research, or approximately 7% of the total expenses.

73. It is respectfully submitted that, as set forth in the accompanying Fee and Expense Application, the expenses for which reimbursement is sought were reasonably necessary to the prosecution of the Action and are of the type that Plaintiffs' Counsel typically incur (and are reimbursed for) in securities cases such as this that result in the creation of a common fund.

74. Moreover, as set forth in the accompanying Fee and Expense Application, the PSLRA, and case law, provides for reimbursement of class representatives' costs, including their reasonable time and expenses in representing a class. Here, the three Plaintiffs—Gary Williams, Giuseppe Veleno, and Ron Miller—have been faithful and actively involved representatives of the Settlement Class, and sat for depositions.

75. The work performed by the three Plaintiffs is set forth in greater detail in the separate declarations being submitted contemporaneously herewith. *See* Williams Decl. at ¶¶3-5; Veleno Decl. at ¶¶3-5; Miller Decl. at ¶¶3-5.

76. Based on our understanding of the work they performed on behalf of the Settlement Class, we believe that an award of \$10,000 each to Giuseppe Veleno, Gary Williams, and Ron Miller is justified.

IX. CONCLUSION

77. For all the reasons set forth above, we respectfully submit that the Settlement and the Plan of Allocation should be approved as fair, reasonable, and adequate. We further submit, and believe, that the requested fee in the amount of 33⅓% of the Settlement Fund should be approved as fair and reasonable, and the request for reimbursement of total Litigation Expenses in the amount of \$123,355.46 (which includes the awards to Plaintiffs) should also be approved.

78. We each declare, under penalty of perjury under the laws of the United States, that the foregoing facts are true and correct. Executed on March 20, 2024.

/s/ Jacob A. Goldberg
Jacob A. Goldberg

/s/ Garth A. Spencer
Garth A. Spencer

EXHIBIT 1

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**DECLARATION OF MARGERY CRAIG CONCERNING (A) MAILING OF THE
POSTCARD NOTICE; (B) PUBLICATION OF THE SUMMARY NOTICE; AND
(C) REPORT ON REQUESTS FOR EXCLUSION AND OBJECTIONS**

I, Margery Craig, declare as follows:

1. I am a Project Manager at Strategic Claims Services, Inc. (“SCS”), a nationally recognized class action administration firm.¹ I have over sixteen years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and fifty (550) class action cases since its inception. I have personal knowledge of the facts set forth herein, and if called on to do so, I could and would testify competently thereto.

MAILING OF THE POSTCARD NOTICE

2. Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice, dated October 19, 2023 (ECF No. 133, the “Preliminary Approval Order”), SCS was retained by Lead Counsel to serve as the Claims Administrator in the above-captioned action (the “Action”). I submit this declaration in order to provide the Court and the Parties with information

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated July 21, 2023 (ECF No. 122-1, the “Stipulation”).

regarding the notice program, as well as updates concerning other aspects of the Settlement administration process.

3. To provide notice to those persons and entities that purchased or otherwise acquired Sonus Networks, Inc. (“Sonus”) (n/k/a Ribbon Communications, Inc.) publicly traded common stock, and/or purchased of otherwise acquired publicly traded Sonus Call Options, and/or wrote publicly traded Sonus Put Options between January 8, 2015 and March 24, 2015, both dates inclusive (the “Settlement Class Period”), SCS printed and mailed the Postcard Notice to potential members of the Settlement Class as required by the Preliminary Approval Order. A true and correct copy of the Postcard Notice is attached hereto as **Exhibit A**.

4. As in most class actions of this nature, the vast majority of potential Settlement Class Members are expected to be beneficial purchasers whose securities are held in “street name” — *i.e.*, the securities are purchased by brokerage firms, banks, institutions, and other third-party nominees in the name of the nominee, on behalf of the beneficial purchasers. The names and addresses of these beneficial purchasers are known only to the nominees. SCS maintains a proprietary master list consisting of 832 banks and brokerage companies (“Nominee Account Holders”), as well as 1,330 mutual funds, insurance companies, pension funds, and money managers (“Institutional Groups”). On November 9, 2023, SCS caused a letter to be mailed or e-mailed to all of the Nominee Account Holders and Institutional Groups notifying them of the Settlement. The letter also requested that, within seven calendar days from the date of the letter, they either:

- (a) request sufficient copies of the Postcard Notice to forward to all beneficial purchasers/owners and, within seven calendar days of receipt of those Postcard Notices, forward them to all such beneficial purchasers/owners;

- (b) request a link to the Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (the "Notice") and Proof of Claim and Release Form (the "Claim Form") (collectively, the "Notice and Claim Form") on the settlement website (www.strategicclaims.net/Sonus/ (the "Settlement Website")) and, within seven (7) calendar days of receipt of the link, email the link to all such beneficial purchasers/owners for whom valid email addresses are available; or
- (c) provide SCS with a list of the names, mailing addresses, and email addresses of potential Settlement Class Members.

A true and correct copy of the letter sent to the Nominee Account Holders and Institutional Groups is attached as **Exhibit B**, and a true and correct copy of the Notice and Claim Form is attached as **Exhibit C**.

5. SCS mailed, by first class mail, postage prepaid, the Postcard Notice to 459 individuals and organizations identified in the transfer records that were provided to SCS by Defendants' Counsel. These records reflect persons and entities that purchased Sonus common stock, call options, and/or wrote put options for their own account, or for the account(s) of their clients, during the Settlement Class Period. The transfer record mailing was completed on November 9, 2023.

6. Following these mailings, SCS received: (a) 2,512 additional names and addresses of potential Settlement Class Members from individuals or nominees requesting that a Postcard Notice be mailed by SCS; (b) a request from two nominees for 7,735 Postcard Notices so that the nominees could forward them to their customers; and (c) notification from one nominee that they

mailed the Postcard Notice to 346 of their customers. To date, 11,052² Postcard Notices have been mailed to potential Settlement Class Members.

7. SCS was also notified by one nominee that they emailed 7,912 of their clients to notify them of the Settlement and provided them with a link to the Notice and Claim Form on the Settlement Website.

8. In total, 18,964 potential Settlement Class Members have been mailed the Postcard Notice or emailed a link to the Notice and Claim Form on the Settlement Website.

9. SCS also sent the Depository Trust Company (“DTC”) the Notice and Claim Form for the DTC to publish on its Legal Notice System (“LENS”) on November 9, 2023. LENS provides DTC participants the ability to search and download legal notices as well as receive e-mail alerts based on particular notices or particular CUSIPs once a legal notice is posted.

10. Out of the 11,052 Postcard Notices mailed, 859 were returned as undeliverable. Of these, the United States Postal Service provided forwarding addresses for 63, and SCS promptly mailed another Postcard Notice to the updated addresses. The remaining 796 Postcard Notices returned as undeliverable were “skip-traced” to obtain updated addresses and 399 were re-mailed to updated addresses.

PUBLICATION OF THE SUMMARY NOTICE

11. Pursuant to the Preliminary Approval Order, the Summary Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (“Summary Notice”) was published once in *Investor’s Business Daily* and transmitted

² SCS received 22 requests from potential Settlement Class Members for the Notice and Claim Form to be mailed. SCS immediately mailed them a Notice and Claim Form.

once over *PR Newswire* on November 27, 2023, as shown in the confirmations of publications attached hereto as **Exhibit D**.

TOLL-FREE PHONE LINE

12. SCS maintains a toll-free telephone number (1-866-274-4004) for potential Settlement Class Members to call and obtain information about the Settlement as well as request the Notice and Claim Form. SCS has promptly responded to each telephone inquiry and will continue to address Settlement Class Member inquiries.

SETTLEMENT WEBSITE

13. On November 8, 2023, SCS established the case-specific Settlement Website. The Settlement Website is accessible 24 hours a day, 7 days a week. The website contains the current status of the Action; the case deadlines; the online claim filing link; and important case documents, such as the Notice and Claim Form, the Postcard Notice, the Preliminary Approval Order, the Stipulation, the Opinion and Order dated October 20, 2022, and the Amended Class Action Complaint for Violations of the Federal Securities Laws. To date, the Settlement Website has received 4,470 pageviews from 890 unique users.

REPORT ON EXCLUSIONS AND OBJECTIONS

14. The Postcard Notice, Notice, Summary Notice, and Settlement Website informed Settlement Class Members that written requests for exclusion are to be mailed to SCS such that they are received no later than April 3, 2024. SCS has monitored all mail delivered for this case. As of the date of this declaration, SCS has received no exclusion requests.

15. The Postcard Notice, Notice, Summary Notice, and Settlement Website further informed Settlement Class Members seeking to object to the Settlement, the proposed Plan of Allocation or Lead Counsel's motion for an award of attorneys' fees and reimbursement of

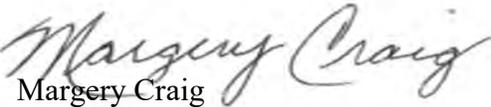
Litigation Expenses, that objections must be submitted in writing to the Clerk of the Court, Lead Counsel, and Defendants' Counsel such that they are received on or before April 3, 2024. As of the date of this declaration, SCS has not been notified of any objections or received any misdirected objections.

CLAIMS RECEIVED TO DATE

16. The deadline for claims submission is March 15, 2024. As of the date of this declaration, SCS has received 1,640 claims. SCS is currently conducting quality assurance reviews of the submitted claims, such as verifying that the claim includes the required supporting documentation and detecting duplicative claims. Once this audit process is complete, claimants with incomplete or invalid claims will be given an opportunity to supplement or complete their claims. With these steps currently outstanding, the number of claims considered valid has not yet been determined.

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

Signed this 18th day of March 2024, in Media, Pennsylvania.


Margery Craig

Miller v.onus Networ s, In . e urities iti ation **EXHIBIT A**
c/o Strategic Claims Services
600 N. Jackson Street, Suite 205
Media, PA 19063

Court-Ordered Legal Notice

Forwarding Service Requested

**Important Notice about a Securities
Class Action Settlement.**

**You may be entitled to a CASH
payment. This Notice may affect
your legal rights. Please read it
carefully.**

Miller v. onus Networ s, In . et al.,
Case No. 1:18-cv-12344-GAO
(D. Mass.)

***THIS CARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE CLASS ACTION SETTLEMENT.
PLEASE VISIT WWW.STRATEGICCLAIMS.NET/SONUS/ FOR MORE INFORMATION.***

There has been a proposed Settlement of claims against Sonus Networks, Inc. (n/k/a Ribbon Communications, Inc.) (“Sonus”) and certain former executives of Sonus (collectively, the “Defendants”). The Settlement would resolve a lawsuit in which Plaintiffs allege that Defendants disseminated materially false and misleading information to the investing public about Sonus’s anticipated revenue for the first quarter of 2015 in violation of the federal securities laws. Defendants deny any wrongdoing. You received this Postcard Notice because you or someone in your family may have purchased or otherwise acquired the publicly traded common stock of Sonus, and/or purchased or otherwise acquired Sonus call options, and/or wrote Sonus put options (“Sonus Securities”), between January 8, 2015 and March 24, 2015, inclusive, and may have suffered economic losses as a proximate result of the alleged wrongdoing.

Defendants have agreed to pay a Settlement Amount of \$4,500,000. The Settlement provides that the Settlement Fund, after deduction of any Court-approved attorneys’ fees and expenses, notice and administration costs, and taxes, is to be divided among all Settlement Class Members who submit a valid Claim Form, in exchange for the settlement of this case and the Releases by Settlement Class Members of claims related to this case. **For all details of the Settlement read the Stipulation and full Notice available at www.strategicclaims.net Sonus .**

Your share of the Settlement proceeds will depend on the number of valid Claims submitted, and the number, size, and timing of your transactions in Sonus Securities. If every eligible Settlement Class Member submits a valid Claim Form, the average recovery will be \$0.70 per eligible share of common stock before expenses and other Court-ordered deductions. Your award will be determined *ro rata* based on the number of claims submitted. This is further explained in the detailed Notice found on the Settlement website.

To qualify for payment you must submit a Claim Form. The Claim Form can be found on the website www.strategicclaims.net/Sonus/ or will be mailed to you upon request to the Claims Administrator (866-274-4004). **Claim Forms must be postmarked or submitted online by March 31, 2024.** If you do not want to be legally bound by the Settlement, you must exclude yourself by April 3, 2024, or you will not be able to sue the Defendants about the legal claims in this case. If you exclude yourself, you cannot get money from this Settlement. If you want to object to the Settlement, you may file an objection by April 3, 2024. The detailed Notice explains how to submit a Claim Form, exclude yourself, or object.

The Court will hold a hearing in this case on April 24, 2024, to consider whether to approve the Settlement and a request by the lawyers representing the Settlement Class for up to 33 $\frac{1}{3}$ % of the Settlement Fund in attorneys’ fees, plus actual expenses up to \$110,000 for litigating the case and negotiating the Settlement, and reimbursement of Plaintiffs’ costs and expenses related to their representation of the Settlement Class in an aggregate amount not to exceed \$30,000. Estimates of the average cost per affected share of Sonus Common Stock, if the Court approves Lead Counsel’s fee and expense application, is \$0.26. You may attend the hearing and ask to be heard by the Court, but you do not have to. For more information, call toll-free (866-274-4004) or visit the website www.strategicclaims.net/Sonus/ and read the detailed Notice.

REQUEST FOR NAMES, EMAILS AND ADDRESSES OF CLASS MEMBERS

STRATEGIC CLAIMS SERVICES
600 N. JACKSON STREET, SUITE 205
MEDIA, PA 19063

PHONE: (610) 565-9202

EMAIL: info@strategicclaims.net

FAX: (610) 565-7985

November 9, 2023

This letter is being sent to all entities whose names have been made available to us, or which we believe may know of potential class members.

We request that you assist us in identifying any individuals who fit the following description:

ALL PERSONS AND ENTITIES WHO DURING THE PERIOD BETWEEN JANUARY 8, 2015 AND MARCH 24, 2015, BOTH DATES INCLUSIVE ("SETTLEMENT CLASS PERIOD"), YOU PURCHASED OR OTHERWISE ACQUIRED PUBLICLY TRADED COMMON STOCK OF SONUS NETWORKS, INC. ("SONUS") (N/K/A RIBBON COMMUNICATIONS, INC.), AND/OR PURCHASED OR OTHERWISE ACQUIRED PUBLICLY TRADED SONUS CALL OPTIONS, AND/OR WROTE PUBLICLY TRADED SONUS PUT OPTIONS, AND WHO SUFFERED ECONOMIC LOSSES AS PROXIMATE RESULT OF THE ALLEGED WRONGDOING.

Excluded from the Settlement Class are: (a) Defendants; (b) present and former parents, subsidiaries, assigns, successors, predecessors and affiliates of Sonus; (c) and person who served as an officer and/or director of Sonus during the Settlement Class Period and their Immediate Family Members; (d) any entity in which the Defendants have or had a controlling interest; (e) any trust of which an Individual Defendant is the settler or which is for the benefit of an Individual Defendant and/or member(s) of their Immediate Families; (f) Defendants' liability insurance carriers; and (g) the legal representatives, heirs, successors, and assigns of any person or entity excluded under provisions (a) through (f) hereof.

The information below may assist you in finding the above requested information.

<p><i>Miller v. Sonus Networks, Inc. Securities Litigation</i> Case No. 1:18-cv-12344-GAO Claim Filing Deadline: March 15, 2024 Exclusion Deadline: April 3, 2024 Objection Deadline: April 3, 2024 Settlement Hearing: April 24, 2024</p>	<p>Cusip Number: 835916107 & 835916503 Ticker Symbol: SONS</p>
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PER COURT ORDER, PLEASE RESPOND WITHIN 7 CALENDAR DAYS FROM THE DATE OF THIS NOTICE.

Please comply in one of the following ways:

1. If you have no beneficial purchasers/owners, please so advise us in writing; or
2. **Supply us with email addresses**, if email addresses are not available, provide us with names and last known addresses of your beneficial purchasers/owners and we will do the emailing of the link to the Notice and Claim Form or mailing of the Postcard Notice. Please provide us this information electronically. If you are not able to do this, labels will be accepted, but it is important that a hardcopy list also be submitted of your clients; or
3. Advise us of how many beneficial purchasers/owners you have, and we will supply you with ample postcards to do the mailing. After the receipt of the Postcard Notice, you have seven (7) calendar days to mail them; or
4. Request a link to the Notice and Claim Form and advise us that you will be emailing the link to your beneficial purchasers/owners within seven (7) days after receipt thereof.

You can bill us for any reasonable expenses actually incurred and **not to exceed:**

\$0.05 per link to the Notice and Claim Form transmitted by email OR

\$0.05 per name, address, and email address if you are providing us the records OR

\$0.05 per name and address, including materials, plus postage at the current pre-sort rate used by the Claims Administrator if you are requesting the Postcard Notice and performing the mailing.

All invoices must be received within 30 days of this letter.

You are on record as having been notified of the legal matter. A copy of the Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses and Proof of Claim Form and Release Form and all the important documents are available on our website at www.strategicclaims.net/Sonus/. You can also request a copy via email at info@strategicclaims.net.

Thank you for your prompt response.

Sincerely,

Claims Administrator

Miller v. Sonus Networks, Inc. Securities Litigation

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**NOTICE OF (I) PENDENCY OF CLASS ACTION, CERTIFICATION OF SETTLEMENT CLASS, AND
PROPOSED SETTLEMENT; (II) SETTLEMENT FAIRNESS HEARING;
AND (III) MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

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

NOTICE OF PENDENCY OF CLASS ACTION: Please be advised that your rights may be affected by the above-captioned securities class action (the “Action”)¹ pending in the United States District Court for the District of Massachusetts (the “Court”), if, during the period between January 8, 2015 and March 24, 2015, both dates inclusive (the “Settlement Class Period”), you purchased or otherwise acquired publicly traded common stock of Sonus Networks, Inc. (“Sonus”) (n/k/a Ribbon Communications, Inc.) (“Sonus Common Stock”), and/or purchased or otherwise acquired publicly traded Sonus call options (“Sonus Call Options”), and/or wrote publicly traded Sonus put options (“Sonus Put Options,” and, together with Sonus Common Stock and Sonus Call Options, “Sonus Securities”), and suffered economic losses as a proximate result of the alleged wrongdoing.²

NOTICE OF SETTLEMENT: Please also be advised that the Court-appointed Lead Plaintiffs Giuseppe Veleno and Gary Williams (collectively, “Lead Plaintiffs”) and Named Plaintiff Ron Miller (together with Lead Plaintiffs, “Plaintiffs”), on behalf of themselves and the Settlement Class (as defined in ¶ 28 below), have reached a proposed settlement of the Action for \$4,500,000 in cash that, if approved, will resolve all claims in the Action (the “Settlement”).

PLEASE READ THIS NOTICE CAREFULLY. This Notice explains important rights you may have, including the possible receipt of cash from the Settlement. If you are a member of the Settlement Class, your legal rights will be affected whether or not you act.

If you have any questions about this Notice, the proposed Settlement, or your eligibility to participate in the Settlement, please DO NOT contact Sonus, any other Defendants in the Action, or their counsel. All questions should be directed to Lead Counsel or the Claims Administrator (see ¶ 97 below).

1. **Description of the Action and the Settlement Class:** This Notice relates to a proposed Settlement of claims in a pending securities class action brought by investors alleging, among other things, that Defendants

¹ All capitalized terms used in this Notice that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated July 21, 2023 (the “Stipulation”), which is available at www.strategicclaims.net/Sonus/.

² Sonus Call Options and Sonus Put Options are collectively referred to herein as “Sonus Options.”

Sonus,³ and Raymond P. Dolan, Mark T. Greenquist, and Michael Swade (collectively, “Individual Defendants”; and together with Sonus, “Defendants”; and together with Plaintiffs and Sonus, the “Parties”) disseminated materially false and misleading information to the investing public about Sonus’s anticipated revenue for the first quarter of 2015 in violation of the federal securities laws, which Defendants deny. A more detailed description of the Action is set forth in paragraphs 11-27 below. The proposed Settlement, if approved by the Court, will settle claims of the Settlement Class, as defined in paragraph 28 below.

2. **Statement of the Settlement Class’s Recovery:** Subject to Court approval, Plaintiffs, on behalf of themselves and the Settlement Class, have agreed to settle the Action in exchange for a settlement payment of \$4,500,000 in cash (the “Settlement Amount”) to be deposited into an escrow account. The Net Settlement Fund (*i.e.*, the Settlement Amount plus any and all interest earned thereon (the “Settlement Fund”) less (a) any Taxes, (b) any Notice and Administration Costs, (c) any Litigation Expenses awarded by the Court, and (d) any attorneys’ fees awarded by the Court) will be distributed in accordance with a plan of allocation that is approved by the Court, which will determine how the Net Settlement Fund shall be allocated among members of the Settlement Class. The proposed plan of allocation (the “Plan of Allocation”) is set forth on pages 10-15 below.

3. **Estimate of Average Amount of Recovery Per Eligible Share:** Based on Plaintiffs’ damages expert’s estimates, the conduct at issue in the Action affected approximately 6.4 million shares of Sonus Common Stock. Assuming all eligible Settlement Class Members elect to participate in the Settlement, the estimated average recovery would be approximately \$0.70 per affected share of Sonus Common Stock, before the deduction of any Court-approved fees, expenses, and costs as described herein.⁴ Settlement Class Members should note, however, that the foregoing average recovery per security is only an estimate. Some Settlement Class Members may recover more or less than this estimated amount depending on, among other factors, when and at what prices they acquired or sold their Sonus Securities, and the total number of valid Claim Forms submitted. Distributions to Settlement Class Members will be made based on the Plan of Allocation set forth herein (*see* paragraphs 54-81, below) or such other plan of allocation as may be ordered by the Court.

4. **Average Amount of Damages Per Share:** The Parties do not agree on the average amount of damages per share that would be recoverable if Plaintiffs were to prevail in the Action. Among other things, Defendants do not agree with the assertion that they violated the federal securities laws or that any damages were suffered by any members of the Settlement Class as a result of their conduct.

5. **Attorneys’ Fees and Expenses Sought:** Plaintiffs’ Counsel, which have been prosecuting the Action on a wholly contingent basis since its inception in 2018, have not received any payment of attorneys’ fees for their representation of the Settlement Class and have advanced the funds to pay expenses necessarily incurred to prosecute this Action. Court-appointed Lead Counsel, Glancy Prongay & Murray LLP and The Rosen Law Firm P.A., will apply to the Court for an award of attorneys’ fees for all Plaintiffs’ Counsel in an amount not to exceed 33 $\frac{1}{3}$ % of the Settlement Fund. In addition, Lead Counsel will apply for reimbursement of Litigation Expenses paid or incurred in connection with the institution, prosecution and resolution of the claims against the Defendants, in an amount not to exceed \$140,000, which may include an application for reimbursement of the reasonable costs and expenses incurred by Plaintiffs directly related to their representation of the Settlement Class. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. Settlement Class Members are not personally liable for any such fees or expenses. Estimates of the average cost per affected share of Sonus Common Stock, if the Court approves Lead Counsel’s fee and expense application, is \$0.26 per affected share.

6. **Identification of Attorneys’ Representatives:** Plaintiffs and the Settlement Class are represented by Garth A. Spencer, Esq., of Glancy Prongay & Murray LLP, 1925 Century Park East, Suite 2100, Los Angeles, CA 90067, (888) 773-9224, settlements@glancylaw.com; and Jacob A. Goldberg, Esq., of The Rosen Law Firm, P.A., 101 Greenwood Avenue, Suite 440, Jenkintown, PA 19046, (215) 600-2817, info@rosenlegal.com.

7. **Reasons for the Settlement:** Plaintiffs’ principal reason for entering into the Settlement is the substantial immediate cash benefit for the Settlement Class without the risk or the delays inherent in further litigation.

³ On October 30, 2017, Sonus announced the completion of its merger with GENBAND US LLC, each becoming a wholly owned subsidiary of a parent company named “Sonus Networks, Inc.” Sonus began conducting business as “Ribbon Communications, Inc.” and its NASDAQ ticker symbol was changed from “SONS” to “RBBN.”

⁴ Pursuant to the Plan of Allocation, the total recovery for Sonus Call Options and Sonus Put Options is limited to 1% of the Net Settlement Fund.

Moreover, the substantial cash benefit provided under the Settlement must be considered against the significant risk that a smaller recovery – or indeed no recovery at all – might be achieved after contested motions, a trial of the Action, and the likely appeals that would follow a trial. This process could be expected to last several years. Defendants, who deny all allegations of wrongdoing or liability whatsoever, are entering into the Settlement solely to eliminate the uncertainty, burden, and expense of further protracted litigation.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT:	
SUBMIT A CLAIM FORM POSTMARKED OR SUBMITTED ONLINE NO LATER THAN MARCH 15, 2024.	This is the only way to be eligible to receive a payment from the Settlement Fund. If you are a Settlement Class Member and you remain in the Settlement Class, you will be bound by the Settlement as approved by the Court and you will give up any Released Plaintiffs’ Claims (defined in ¶ 37 below) that you have against Defendants and the other Defendants’ Releasees (defined in ¶ 38 below), so it is in your interest to submit a Claim Form.
EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION SO THAT IT IS RECEIVED NO LATER THAN APRIL 3, 2024.	If you exclude yourself from the Settlement Class, you will not be eligible to receive any payment from the Settlement Fund. This is the only option that allows you ever to be part of any other lawsuit against any of the Defendants or the other Defendants’ Releasees concerning the Released Plaintiffs’ Claims.
OBJECT TO THE SETTLEMENT BY SUBMITTING A WRITTEN OBJECTION SO THAT IT IS RECEIVED NO LATER THAN APRIL 3, 2024.	If you do not like the proposed Settlement, the proposed Plan of Allocation, or the request for attorneys’ fees and reimbursement of Litigation Expenses, you may write to the Court and explain why you do not like them. You cannot object to the Settlement, the Plan of Allocation, or the fee and expense request unless you are a Settlement Class Member and do not exclude yourself from the Settlement Class.
GO TO A HEARING ON APRIL 24, 2024 AT 2:00 P.M., AND FILE A NOTICE OF INTENTION TO APPEAR SO THAT IT IS RECEIVED NO LATER THAN APRIL 3, 2024.	Filing a written objection and notice of intention to appear by April 3, 2024 allows you to speak in Court, at the discretion of the Court, about the fairness of the proposed Settlement, the Plan of Allocation, and/or the request for attorneys’ fees and reimbursement of Litigation Expenses. If you submit a written objection, you may (but you do not have to) attend the hearing and, at the discretion of the Court, speak to the Court about your objection.
DO NOTHING.	If you are a member of the Settlement Class and you do not submit a valid Claim Form, you will not be eligible to receive any payment from the Settlement Fund. You will, however, remain a member of the Settlement Class, which means that you give up your right to sue about the claims that are resolved by the Settlement and you will be bound by any judgments or orders entered by the Court in the Action.

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WHY DID I GET THE POSTCARD NOTICE?

8. The Court directed that the Postcard Notice be mailed to you because you or someone in your family or an investment account for which you serve as a custodian may have purchased or otherwise acquired Sonus Common Stock, and/or purchased or otherwise acquired Sonus Call Options, and/or wrote Sonus Put Options, during the Settlement Class Period, and suffered economic losses as a proximate result of the alleged wrongdoing. The Court also directed that this Notice be posted online at www.strategclaims.net/Sonus/ and mailed to you upon request to the Claims Administrator. The Court has directed us to disseminate these notices because, as a potential Settlement Class Member, you have a right to know about your options before the Court rules on the proposed Settlement. Additionally, you have the right to understand how this class action lawsuit may generally affect your legal rights. If the Court approves the Settlement and the Plan of Allocation (or some other plan of allocation), the claims administrator selected by Plaintiffs and approved by the Court will make payments pursuant to the Settlement after any objections and appeals are resolved.

9. The purpose of this Notice is to inform you of the existence of this case, that it is a class action, how you might be affected, and how to exclude yourself from the Settlement Class if you wish to do so. It is also being sent to inform you of the terms of the proposed Settlement, and of a hearing to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement, the proposed Plan of Allocation, and the motion by Lead Counsel for an award of attorneys' fees and reimbursement of Litigation Expenses (the "Settlement Hearing"). See paragraphs 87-88 below for details about the Settlement Hearing, including the date and location of the hearing.

10. The issuance of this Notice is not an expression of any opinion by the Court concerning the merits of any claim in the Action, and the Court still has to decide whether to approve the Settlement. If the Court approves the Settlement and a plan of allocation, then payments to Authorized Claimants will be made after any appeals are resolved and after the completion of all claims processing. Please be patient, as this process can take some time to complete.

WHAT IS THIS CASE ABOUT?

11. Sonus was in the business of selling communications networking products and services to telecommunications providers and to other businesses such as large financial institutions and retailers. Sonus products included session border controllers, diameter signaling controllers, policy/routing servers, media and signaling gateways, and network analytics tools. This case involves Defendants' representations and guidance concerning Sonus's anticipated revenue for the first quarter of 2015. Plaintiffs allege that Defendants provided guidance for \$74 million in revenue for the first quarter of 2015, but in fact knew that Sonus would not be able to achieve that forecast.

12. On November 8, 2018, Named Plaintiff Ron Miller initiated this action by filing a class action complaint in the United States District Court for the District of Massachusetts asserting claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 ("Exchange Act"), 14 U.S.C. §§ 78j(b), 78t(a), and Securities and Exchange Commission Rule 10b-5, 17 C.F.R. 240.10b-5.

13. By Order dated June 21, 2019, the Court appointed Giuseppe Veleno and Gary Williams as Lead Plaintiffs and approved Lead Plaintiffs' selection of The Rosen Law Firm, P.A. and Glancy Prongay & Murray LLP as co-

Lead Counsel for the class. The Court further approved Lead Plaintiffs' selection of Andrews DeValerio LLP as Liaison Counsel.

14. On July 19, 2019, Plaintiffs filed and served their Amended Class Action Complaint, asserting claims against all Defendants for violations of the federal securities laws (the "Complaint").

15. Among other things, the Complaint alleged that Defendants published materially false and misleading statements regarding Sonus's first quarter 2015 revenue guidance. According to the Complaint, the alleged misrepresentations proximately caused Settlement Class Member losses when Sonus revealed that it in fact only expected \$47 million to \$50 million of first quarter 2015 revenue.

16. On August 30, 2019, Defendants moved to dismiss the Complaint. Plaintiffs filed their opposition to Defendants' motion on October 4, 2019, and on November 1, 2019, Defendants filed a reply brief. On February 12, 2020 the Court heard oral argument, and took the motion under advisement. On October 20, 2022, the Court denied Defendants' motion to dismiss.

17. On December 16, 2022, Defendants filed their answers to the Complaint, denying any liability.

18. On December 16, 2022, the Parties filed their Joint Rule 26(f) Report, after which they commenced discovery.

19. On February 28, 2023, the Court held a scheduling conference with the Parties and set certain case deadlines, including deadlines relating to Plaintiffs' planned motion for class certification.

20. While the Parties believe in the merits of their respective positions, they also recognized the benefits that would accrue if they could reach an agreement to resolve the Action. They began to discuss the possibility of exploring whether a settlement could be reached through a mediation process. The Parties selected David Geronemus, Esq. of JAMS as mediator.

21. On April 5, 2023, the Parties reached an agreement on certain scheduling and discovery matters, to conduct certain discovery prior to their planned mediation, and to defer class certification briefing and certain other discovery until after their planned mediation.

22. On April 7, 2023, the Parties filed a joint stipulation informing the Court that they had scheduled a private mediation for June 13, 2023, and requesting that the Court-ordered deadlines for class certification be continued until after the scheduled mediation. On April 12, 2023, the Court so ordered the Parties' joint stipulation to continue class certification deadlines.

23. In advance of the June 13, 2023 mediation, the Parties served and responded to interrogatories and requests for production of documents. Plaintiffs produced documents to Defendants, and Defendants took the depositions of Plaintiffs Giuseppe Veleno, Gary Williams, and Ron Miller. Defendants produced 11,512 documents spanning 40,607 bates number pages, and certain non-parties produced additional documents pursuant to subpoenas issued by Plaintiffs.

24. On June 13, 2023, the Parties participated in an all day, in-person mediation before the mediator, Mr. Geronemus. In advance of the mediation, the Parties exchanged, and provided to Mr. Geronemus, detailed mediation statements and exhibits, which addressed issues including liability, damages, and class certification. After a full day of mediation on June 13, 2023, the Parties accepted a mediator's proposal to settle the Action in return for a cash payment on behalf of Defendants of \$4,500,000.

25. Based upon their investigation, prosecution, and mediation of the case, and their review of documents produced by Defendants, Plaintiffs and Lead Counsel have concluded that the terms and conditions of the Settlement are fair, reasonable, and adequate to Plaintiffs and the other members of the Settlement Class, and in their best interests. Based on the investigation and mediation of the case and Plaintiffs' direct oversight of the prosecution of this matter, and with the advice of counsel, Plaintiffs have agreed to settle and release the claims raised in the Action pursuant to the terms and provisions of the Stipulation, after considering, among other things, (a) the substantial financial benefit that Plaintiffs and the other members of the Settlement Class will receive under the proposed Settlement; and (b) the significant risks and costs of continued litigation and trial.

26. Defendants are entering into the Settlement solely to eliminate the uncertainty, burden, and expense of further protracted litigation. Each of the Defendants denies any wrongdoing, and the Settlement shall in no event be construed or deemed to be evidence of or an admission or concession on the part of any of the Defendants, or any other of the Defendants' Releasees (defined in ¶ 38 below), with respect to any claim or allegation of any fault

or liability or wrongdoing or damage whatsoever, or any infirmity in the defenses that the Defendants have, or could have, asserted. Similarly, the Stipulation shall in no event be construed or deemed to be evidence of or an admission or concession on the part of Plaintiffs of any infirmity in any of the claims asserted in the Action, or an admission or concession that any of the Defendants' defenses to liability had any merit.

27. On October 19, 2023, the Court preliminarily approved the Settlement, authorized the Postcard Notice to be mailed to potential Settlement Class Members and this Notice to be posted online and mailed to potential Settlement Class Members upon request, and scheduled the Settlement Hearing to consider whether to grant final approval to the Settlement.

**HOW DO I KNOW IF I AM AFFECTED BY THE SETTLEMENT?
WHO IS INCLUDED IN THE SETTLEMENT CLASS?**

28. If you are a member of the Settlement Class, you are subject to the Settlement, unless you timely request to be excluded. The Settlement Class consists of:

all persons and entities that purchased or otherwise acquired publicly traded Sonus Common Stock, and/or purchased or otherwise acquired publicly traded Sonus Call Options, and/or wrote publicly traded Sonus Put Options, during the period between January 8, 2015 and March 24, 2015, both dates inclusive, and who suffered economic losses as a proximate result of the alleged wrongdoing.

Excluded from the Settlement Class are: (i) persons who suffered no compensable losses; and (ii)(a) Defendants; (b) present and former parents, subsidiaries, assigns, successors, predecessors and affiliates of Sonus;⁵ (c) any person who served as an officer and/or director of Sonus during the Settlement Class Period and their Immediate Family members; (d) any entity in which the Defendants have or had a controlling interest; (e) any trust of which an Individual Defendant is the settler or which is for the benefit of an Individual Defendant and/or member(s) of their Immediate Families; (f) Defendants' liability insurance carriers; and (g) the legal representatives, heirs, successors, and assigns of any person or entity excluded under provisions (a) through (f) hereof. Also excluded from the Settlement Class are any persons and entities who or which submit a request for exclusion from the Settlement Class that is accepted by the Court. *See* "What If I Do Not Want To Be A Member Of The Settlement Class? How Do I Exclude Myself," on page 16 below.

PLEASE NOTE: RECEIPT OF THE POSTCARD NOTICE DOES NOT MEAN THAT YOU ARE A SETTLEMENT CLASS MEMBER OR THAT YOU WILL BE ENTITLED TO RECEIVE PROCEEDS FROM THE SETTLEMENT.

If you are a Settlement Class Member and you wish to be eligible to participate in the distribution of proceeds from the Settlement, you are required to submit the Claim Form that is available online at www.strategicclaims.net/Sonus/ or which can be mailed to you upon request to the Claims Administrator, and the required supporting documentation as set forth therein, postmarked or submitted online no later than March 15, 2024.

WHAT ARE PLAINTIFFS' REASONS FOR THE SETTLEMENT?

29. Plaintiffs and Lead Counsel believe that the claims asserted against Defendants have merit. They recognize, however, the expense and length of continued proceedings necessary to pursue their claims against Defendants through trial and appeals, as well as the very substantial risks they would face in establishing liability and damages. Plaintiffs and Lead Counsel also recognize that Defendants have numerous avenues of attack that could preclude a recovery as to Defendants' allegedly false and misleading statements. For example, Defendants would likely continue to assert that Plaintiffs' claims are time-barred by the statute of limitations. Defendants would also likely continue to argue that their statements were not knowingly false because they reasonably expected to achieve \$74 million in first quarter 2015 revenue, and had no intent to deceive investors. Even if those hurdles to establishing liability were overcome, Defendants would likely assert that the statements at issue did not cause investors' losses, and would likely contest the existence and amount of any damages that could be attributed to the allegedly false statements. To receive any recovery, Plaintiffs would have to prevail at several stages, including class certification

⁵ As used herein, the term "affiliates" means persons or entities that directly or indirectly through one or more intermediaries control, are controlled by, or are under common control with one of the Defendants.

and summary judgment. If Plaintiffs' claims made it to trial and Plaintiffs prevailed, appeals would likely follow. Thus, there were significant risks attendant to the continued prosecution of the Action.

30. In light of these risks, the amount of the Settlement, and the immediacy of recovery to the Settlement Class, Plaintiffs and Lead Counsel believe that the proposed Settlement is fair, reasonable, and adequate, and in the best interests of the Settlement Class. Plaintiffs and Lead Counsel also believe that the Settlement provides a substantial benefit to the Settlement Class, namely \$4,500,000 in cash (less the various deductions described in this Notice), as compared to the risk that the claims in the Action would produce a smaller or no recovery after summary judgment, trial and appeals, possibly years in the future.

31. Defendants have denied the claims asserted against them in the Action and deny having engaged in any wrongdoing or violation of law of any kind whatsoever. Defendants have agreed to the Settlement solely to eliminate the burden and expense of continued litigation. Accordingly, the Settlement may not be construed as an admission of any wrongdoing by Defendants.

WHAT MIGHT HAPPEN IF THERE WERE NO SETTLEMENT?

32. 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 members of the Settlement Class would recover anything from Defendants. Also, if Defendants were successful in proving any of their defenses, either at summary judgment, at trial, or on appeal, the Settlement Class could recover substantially less than the amount provided in the Settlement, or nothing at all.

HOW ARE SETTLEMENT CLASS MEMBERS AFFECTED BY THE ACTION AND THE SETTLEMENT?

33. As a Settlement Class Member, you are represented by Plaintiffs and Lead Counsel, unless you enter an appearance through counsel of your own choice at your own expense. You are not required to retain your own counsel, but if you choose to do so, such counsel must file a notice of appearance on your behalf and must serve copies of his or her appearance on the attorneys listed in the section entitled "When And Where Will The Court Decide Whether To Approve The Settlement?" on page 17 below.

34. If you are a Settlement Class Member and do not wish to remain a Settlement Class Member, you may exclude yourself from the Settlement Class by following the instructions in the section entitled "What If I Do Not Want To Be A Member Of The Settlement Class? How Do I Exclude Myself?" on page 16 below.

35. If you are a Settlement Class Member and you wish to object to the Settlement, the Plan of Allocation, or Lead Counsel's application for attorneys' fees and reimbursement of Litigation Expenses, and if you do not exclude yourself from the Settlement Class, you may present your objections by following the instructions in the section entitled "When And Where Will The Court Decide Whether To Approve The Settlement?" below.

36. If you are a Settlement Class Member and you do not exclude yourself from the Settlement Class, you will be bound by any orders issued by the Court. If the Settlement is approved, the Court will enter a judgment (the "Judgment"). The Judgment will dismiss with prejudice the claims against Defendants and will provide that, upon the Effective Date of the Settlement, Plaintiffs and each of the other members of the Settlement Class, on behalf of themselves, and on behalf of any other person or entity legally entitled to bring Released Plaintiffs' Claims (as defined in ¶ 37 below) on behalf of the respective Settlement Class Member in such capacity only, shall be deemed to have, and by operation of law and of the judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Plaintiffs' Claim against Defendants and the other Defendants' Releasees (as defined in ¶ 38 below), and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiffs' Claims against any of the Defendants or any of the other Defendants' Releasees.

37. "Released Plaintiffs' Claims" means all claims and causes of action of every nature and description, whether known claims or Unknown Claims, whether arising under federal, state, common, or foreign law, that Plaintiffs or any other member of the Settlement Class: (i) asserted in the Amended Class Action Complaint for Violations of the Federal Securities Laws ("Complaint"); or (ii) could have asserted in any forum that arise out of or are based upon the allegations, transactions, facts, matters or occurrences, representations or omissions involved, set forth, or referred to in the Complaint and that relate to the purchase or sale of Sonus Securities during the Settlement Class Period. Released Plaintiffs' Claims do not include any claims: (i) relating to the enforcement of

the Settlement; or (ii) of any person or entity who or which submits a request for exclusion that is accepted by the Court.

38. “Defendants’ Releasees” means (i) each Defendant; (ii) Immediate Family members of the Individual Defendants; (iii) direct or indirect parent entities, subsidiaries, related entities, and affiliates of Sonus; (iv) any trust of which any Individual Defendant is the settler or which is for the benefit of any Individual Defendant and/or his or her Immediate Family members; (v) for any of the individuals or entities listed in parts (i) through (iv), their respective past and present general partners, limited partners, principals, shareholders, joint venturers, officers, directors, managing directors, supervisors, employees, contractors, consultants, experts, auditors, accountants, financial advisors, insurers, trustees, trustors, agents, attorneys, predecessors, successors, assigns, heirs, executors, administrators, and any controlling person thereof; and (vi) any entity in which a Defendant has a controlling interest; all in their capacities as such.

39. “Unknown Claims” means any Released Plaintiffs’ Claims which any Plaintiff 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 such claims, and any Released Defendants’ Claims which any Defendant or any other Defendants’ Releasee does not know or suspect to exist in his, her, or its favor at the time of the release of such claims, which, if known by him, her or it, might have affected his, her or its decision(s) with respect to this Settlement. With respect to any and all Released Claims, the Parties stipulate and agree that, upon the Effective Date of the Settlement, Plaintiffs and Defendants shall expressly waive, and each of the other Settlement Class Members and each of the other Defendants’ Releasees shall be deemed to have waived, and by operation of the Judgment or the Alternate Judgment, if applicable, shall have expressly waived, any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law or foreign law, which is similar, comparable, or equivalent to California Civil 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.

Plaintiffs and Defendants acknowledge, and each of the other Settlement Class Members and each of the other Defendants’ Releasees shall be deemed by operation of law to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement.

40. The Judgment will also provide that, upon the Effective Date of the Settlement, Defendants, on behalf of themselves, and on behalf of any other person or entity legally entitled to bring Released Defendants’ Claims (as defined in ¶ 41 below) on behalf of Defendants in such capacity only, shall be deemed to have, and by operation of law and of the judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Defendants’ Claim against Plaintiffs and the other Plaintiffs’ Releasees (as defined in ¶ 42 below), and shall forever be barred and enjoined from prosecuting any or all of the Released Defendants’ Claims against any of the Plaintiffs or any of the Plaintiffs’ Releasees.

41. “Released Defendants’ Claims” means all claims and causes of action of every nature and description, whether known claims or Unknown Claims, whether arising under federal, state, common, or foreign law, that arise out of or relate in any way to the institution, prosecution, or settlement of the claims asserted in the Action against the Defendants. Released Defendants’ Claims shall not include any claims relating to (i) the enforcement of the Settlement; or (ii) any claims against any person or entity who or which submits a request for exclusion from the Settlement Class that is accepted by the Court.

42. “Plaintiffs’ Releasees” means (i) Plaintiffs, all other Settlement Class members, Lead Counsel, Liaison Counsel, and (ii) each of their respective Immediate Family members, and their respective partners, general partners, limited partners, principals, shareholders, joint venturers, officers, directors, managing directors, supervisors, employees, contractors, consultants, experts, auditors, accountants, financial advisors, insurers, trustees, trustors, agents, attorneys, predecessors, successors, assigns, heirs, executors, administrators, and any controlling person thereof, all in their capacities as such.

HOW DO I PARTICIPATE IN THE SETTLEMENT? WHAT DO I NEED TO DO?

43. To be eligible for a payment from the proceeds of the Settlement, you must be a member of the Settlement Class and you must timely complete and return the Claim Form with adequate supporting documentation **postmarked or submitted online no later than March 15, 2024**. A Claim Form is available on the website

maintained by the Claims Administrator for the Settlement, www.strategicclaims.net/Sonus/, or you may request that a Claim Form be mailed to you by calling the Claims Administrator toll free at 1-866-274-4004. Please retain all records of your ownership of and transactions in Sonus Securities, as they may be needed to document your Claim. If you request exclusion from the Settlement Class or do not submit a timely and valid Claim Form, you will not be eligible to share in the Net Settlement Fund.

HOW MUCH WILL MY PAYMENT BE?

44. At this time, it is not possible to make any determination as to how much any individual Settlement Class Member may receive from the Settlement.

45. Pursuant to the Settlement, Defendants have agreed to pay or caused to be paid \$4,500,000 in cash. The Settlement Amount will be deposited into an escrow account. The Settlement Amount plus any interest earned thereon is referred to as the “Settlement Fund.” If the Settlement is approved by the Court and the Effective Date occurs, the “Net Settlement Fund” (that is, the Settlement Fund less (a) all federal, state, and/or local taxes on any income earned by the Settlement Fund and the reasonable costs incurred in connection with determining the amount of and paying taxes owed by the Settlement Fund (including reasonable expenses of tax attorneys and accountants); (b) the costs and expenses incurred in connection with providing notice to Settlement Class Members and administering the Settlement on behalf of Settlement Class Members; and (c) any attorneys’ fees and Litigation Expenses awarded by the Court) will be distributed to Settlement Class Members who submit valid Claim Forms, in accordance with the proposed Plan of Allocation or such other plan of allocation as the Court may approve.

46. The Net Settlement Fund will not be distributed unless and until the Court has approved the Settlement and a plan of allocation, and the time for any petition for rehearing, appeal, or review, whether by certiorari or otherwise, has expired.

47. Neither Defendants nor any other person or entity that paid any portion of the Settlement Amount on their behalf are entitled to get back any portion of the Settlement Fund once the Court’s order or judgment approving the Settlement becomes Final. Defendants shall not have any liability, obligation, or responsibility for the administration of the Settlement, the disbursement of the Net Settlement Fund, or the plan of allocation.

48. Approval of the Settlement is independent from approval of a plan of allocation. Any determination with respect to a plan of allocation will not affect the Settlement, if approved.

49. Unless the Court otherwise orders, any Settlement Class Member who fails to submit a Claim Form postmarked or submitted online on or before March 15, 2024 shall be fully and forever barred from receiving payments pursuant to the Settlement but will in all other respects remain a Settlement Class Member and be subject to the provisions of the Stipulation, including the terms of any Judgment entered and the releases given. This means that each Settlement Class Member releases the Released Plaintiffs’ Claims (as defined in ¶ 37 above) against the Defendants and the Defendants’ Releasees (as defined in ¶ 38 above) and will be enjoined and prohibited from filing, prosecuting, or pursuing any of the Released Plaintiffs’ Claims against any of the Defendants or the Defendants’ Releasees whether or not such Settlement Class Member submits a Claim Form.

50. Participants in and beneficiaries of a plan covered by ERISA (“ERISA Plan”) should NOT include any information relating to their transactions in Sonus Securities held through the ERISA Plan in any Claim Form that they may submit in this Action. They should include ONLY those securities that they purchased, acquired or sold outside of the ERISA Plan. Claims based on any ERISA Plan’s purchases, acquisitions or sales of Sonus Securities during the Settlement Class Period may be made by the plan’s trustees. To the extent any of the Defendants or any of the other persons or entities excluded from the Settlement Class are participants in the ERISA Plan, such persons or entities shall not receive, either directly or indirectly, any portion of the recovery that may be obtained from the Settlement by the ERISA Plan.

51. The Court has reserved jurisdiction to allow, disallow, or adjust on equitable grounds the Claim of any Settlement Class Member.

52. Each Claimant shall be deemed to have submitted to the jurisdiction of the Court with respect to his, her, or its Claim Form.

53. Only Settlement Class Members will be eligible to share in the distribution of the Net Settlement Fund. Persons and entities that are excluded from the Settlement Class by definition or that exclude themselves from the

Settlement Class pursuant to request will not be eligible to receive a distribution from the Net Settlement Fund and should not submit Claim Forms.

PROPOSED PLAN OF ALLOCATION

54. The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund among Authorized Claimants based on their respective alleged economic losses as a result of the alleged misstatements and omissions, as opposed to losses caused by market or industry-wide factors, or company-specific factors unrelated to the alleged fraud. The Claims Administrator shall determine each Authorized Claimant's share of the Net Settlement Fund based upon the recognized loss formulas described below ("Recognized Loss").

55. A Recognized Loss will be calculated for each share of Sonus Common Stock, and each Sonus Call Option purchased or otherwise acquired during the Settlement Class Period, and each Sonus Put Option sold (written) during the Settlement Class Period. The calculation of Recognized Loss will depend upon several factors, including when the Sonus Securities were purchased or otherwise acquired during the Settlement Class Period, and in what amounts, and whether those securities were sold, and if sold, when they were sold, and for what amounts. The Recognized Loss is not intended to estimate the amount a Settlement Class Member might have been able to recover after a trial, nor to estimate the amount that will be paid to Authorized Claimants pursuant to the Settlement. The Recognized Loss is the basis upon which the Net Settlement Fund will be proportionately allocated to the Authorized Claimants. The Claims Administrator will use its best efforts to administer and distribute the Net Settlement Fund equitably to the extent that it is economically feasible.

56. The Plan of Allocation was created with the assistance of a consulting damages expert and reflects the assumption that the prices of Sonus Common Stock were artificially inflated throughout the Settlement Class Period. The estimated alleged artificial inflation in the prices of Sonus Common Stock during the Settlement Class Period is reflected in Table 1, below. The computation of the estimated alleged artificial inflation in the prices of Sonus Common Stock during the Settlement Class Period is based on certain misrepresentations alleged by Plaintiffs and the price change in the securities, net of market- and industry-wide factors, in reaction to the public announcements that allegedly corrected the misrepresentations alleged by Plaintiffs.

57. The U.S. securities laws allow investors to seek to recover losses caused by disclosures that correct the defendants' previous misleading statements or omissions. In this Action, Plaintiffs allege that corrective disclosures removed the artificial inflation in the prices of Sonus Common Stock on the following dates: March 20, 2015; March 23, 2015; and March 24, 2015 (the "Corrective Disclosure Dates"). Defendants deny that they made any misleading statements or omissions and therefore also deny that corrective disclosures were made. In order for a Settlement Class Member to have a Recognized Loss under the Plan of Allocation, with respect to Sonus Common Stock and Sonus Call Options, the stock or call options must have been purchased or acquired during the Settlement Class Period and held through at least one of the Corrective Disclosure Dates; and, with respect to Sonus Put Options, those options must have been sold (written) during the Settlement Class Period and not closed prior to at least one of the Corrective Disclosure Dates:

Table 1		
Artificial Inflation in Sonus Common Stock		
From	To	Per-Share Price Inflation
Thursday, January 8, 2015	Thursday, March 19, 2015	\$6.61
Friday, March 20, 2015	Friday, March 20, 2015	\$5.47
Monday, March 23, 2015	Monday, March 23, 2015	\$4.24
Tuesday, March 24, 2015	Thereafter	\$0.00

58. The per-share Recognized Loss for Sonus Common Stock shall be the Recognized Loss amount as described below in "Sonus Common Stock Recognized Loss Calculations." The per-option Recognized Loss for Sonus Call Options and Sonus Put Options shall be the Recognized Loss amount as described below in "Sonus Call and Put Option Recognized Loss Calculations."

59. The "90-day look back" provision of the Private Securities Litigation Reform Act of 1995 ("PSLRA") is incorporated into the calculation of the Recognized Loss for Sonus Common Stock. The limitations on the calculation of the Recognized Loss imposed by the PSLRA are applied such that losses on Sonus Common Stock purchased during the Settlement Class Period and held as of the close of the 90-day period subsequent to the

Settlement Class Period (the “90-Day Lookback Period”⁶) cannot exceed the difference between the purchase price paid for such securities and its average price during the 90-Day Lookback Period. The Recognized Loss on Sonus Common Stock purchased during the Settlement Class Period and sold during the 90-Day Lookback Period cannot exceed the difference between the purchase price paid for such securities and its rolling average price during the portion of the 90-Day Lookback Period elapsed as of the date of sale.

60. In the calculations below, all purchase and sale prices shall exclude any fees, taxes and commissions. If a Recognized Loss amount is calculated to be a negative number, that Recognized Loss shall be set to zero. Any transactions in Sonus Securities executed outside of regular trading hours for the U.S. financial markets shall be deemed to have occurred during the next regular trading session.

61. With respect to Sonus Securities, a Recognized Loss will be calculated as set forth below for each purchase or acquisition of Sonus Common Stock and Call Option contracts, and for each writing of Sonus Put Option contracts during the Settlement Class Period, that is listed in the Claim Form and for which adequate documentation is provided.

SONUS COMMON STOCK RECOGNIZED LOSS CALCULATIONS

62. For each share of Sonus Common Stock purchased or otherwise acquired during the Settlement Class Period, the Recognized Loss per share shall be calculated as follows:

- I. For each share purchased during the period January 8, 2015 through March 23, 2015, inclusive,
 - a. that was sold prior to March 20, 2015, the Recognized Loss is \$0.00.
 - b. that was sold on March 20, 2015 or March 23, 2015, inclusive, the Recognized Loss is *the lesser of*:
 - i. the amount of per-share price inflation on the date of purchase as appears in Table 1 above *minus* the amount of per-share price inflation on the date of sale as appears in Table 1; or
 - ii. the purchase price *minus* the sale price.
 - c. that was sold on March 24, 2015, the Recognized Loss is *the lesser of*:
 - i. the amount of per-share price inflation on the date of purchase as appears in Table 1 above; or
 - ii. the purchase price *minus* the sale price.
 - d. that was sold during the period March 25, 2015 through June 22, 2015, inclusive (*i.e.*, sold during the 90-Day Lookback Period), the Recognized Loss is *the least of*:
 - i. the amount of per-share price inflation on the date of purchase as appears in Table 1; or
 - ii. the purchase price *minus* the sale price; or
 - iii. the purchase price *minus* the “90-Day Lookback Value” on the date of sale as provided in Table 2.
 - e. that was still held as of the close of trading on June 22, 2015, the Recognized Loss is *the lesser of*:
 - i. the amount of per-share price inflation on the date of purchase as appears in Table 1; or
 - ii. the purchase price *minus* the average closing price for Sonus Common Stock during the 90-Day Lookback Period, which is \$7.87.
- II. For each share purchased on or after March 24, 2015, the Recognized Loss is \$0.00.

⁶ The Settlement Class Period ends on March 24, 2015. The 90-Day Lookback Period is March 25, 2015 through June 22, 2015, inclusive.

Table 2					
Sale/ Disposition Date	90-Day Lookback Value	Sale/ Disposition Date	90-Day Lookback Value	Sale/ Disposition Date	90-Day Lookback Value
3/25/2015	\$8.38	4/24/2015	\$7.89	5/26/2015	\$7.87
3/26/2015	\$8.23	4/27/2015	\$7.90	5/27/2015	\$7.87
3/27/2015	\$8.15	4/28/2015	\$7.90	5/28/2015	\$7.87
3/30/2015	\$8.11	4/29/2015	\$7.91	5/29/2015	\$7.87
3/31/2015	\$8.06	4/30/2015	\$7.91	6/1/2015	\$7.87
4/1/2015	\$8.05	5/1/2015	\$7.91	6/2/2015	\$7.86
4/2/2015	\$8.03	5/4/2015	\$7.91	6/3/2015	\$7.86
4/6/2015	\$8.01	5/5/2015	\$7.91	6/4/2015	\$7.86
4/7/2015	\$7.99	5/6/2015	\$7.90	6/5/2015	\$7.87
4/8/2015	\$7.96	5/7/2015	\$7.90	6/8/2015	\$7.87
4/9/2015	\$7.93	5/8/2015	\$7.89	6/9/2015	\$7.87
4/10/2015	\$7.90	5/11/2015	\$7.89	6/10/2015	\$7.87
4/13/2015	\$7.88	5/12/2015	\$7.89	6/11/2015	\$7.86
4/14/2015	\$7.86	5/13/2015	\$7.89	6/12/2015	\$7.86
4/15/2015	\$7.85	5/14/2015	\$7.89	6/15/2015	\$7.86
4/16/2015	\$7.86	5/15/2015	\$7.89	6/16/2015	\$7.86
4/17/2015	\$7.85	5/18/2015	\$7.89	6/17/2015	\$7.86
4/20/2015	\$7.87	5/19/2015	\$7.89	6/18/2015	\$7.86
4/21/2015	\$7.86	5/20/2015	\$7.88	6/19/2015	\$7.87
4/22/2015	\$7.86	5/21/2015	\$7.88	6/22/2015	\$7.87
4/23/2015	\$7.87	5/22/2015	\$7.88	N/A	N/A

SONUS CALL AND PUT OPTION RECOGNIZED LOSS CALCULATIONS

63. For each Sonus Call Option purchased or otherwise acquired during the Settlement Class Period, the Recognized Loss per option shall be calculated as follows:

- I. For each Sonus Call Option not held at the opening of trading on at least one of the Corrective Disclosure Dates as defined above, the Recognized Loss is \$0.00.
- II. For each Sonus Call Option purchased during the period January 8, 2015 through March 23, 2015, inclusive, and held at the opening of trading on one or more of the Corrective Disclosure Dates as defined above,
 - a. that was subsequently sold prior to the close of trading on March 24, 2015, the Recognized Loss is the purchase price *minus* the sale price.
 - b. that was subsequently exercised prior to the close of trading on March 24, 2015, the Recognized Loss is the purchase price *minus* the intrinsic value of the Sonus Call Option on the date of exercise, where the intrinsic value shall be *the greater of*: (i) \$0.00 or (ii) the closing price of Sonus Common Stock on the date of exercise *minus* the strike price of the option.
 - c. that expired unexercised prior to the close of trading on March 24, 2015, the Recognized Loss is equal to the purchase price.
 - d. that was still held as of the close of trading March 24, 2015, the Recognized Loss is the purchase price *minus* the intrinsic value of the Sonus Call Option as of the close of trading on March 24, 2015, where the intrinsic value shall be *the greater of*: (i) \$0.00 or (ii) \$8.70⁷ *minus* the strike price of the option.
- III. For each Sonus Call Option purchased on March 24, 2015 or after, the Recognized Loss is \$0.00.

⁷ \$8.70 is the closing price of Sonus Common Stock on March 24, 2015.

No Recognized Loss shall be calculated based upon the purchase or acquisition of any Sonus Call Option that had been previously sold or written.

64. For each Sonus Put Option written during the Settlement Class Period, the Recognized Loss per option shall be calculated as follows:

- I. For each Sonus Put Option not open (*i.e.*, not outstanding) at the opening of trading on at least one of the Corrective Disclosure Dates as defined above, the Recognized Loss is \$0.00.
- II. For each Sonus Put Option sold during the period January 8, 2015 through March 23, 2015, inclusive, and still outstanding at the opening of trading on one or more of the Corrective Disclosure Dates as defined above,
 - a. that was subsequently purchased prior to the close of trading on March 24, 2015, the Recognized Loss is the purchase price *minus* the sale price.
 - b. that was subsequently exercised (*i.e.*, assigned) prior to the close of trading on March 24, 2015, the Recognized Loss is the intrinsic value of the Sonus Put Option on the date of exercise *minus* the sale price, where the intrinsic value shall be *the greater of*: (i) \$0.00 or (ii) the strike price of the option *minus* the closing price of Sonus Common Stock on the date of exercise.
 - c. that expired unexercised prior to the close of trading on March 24, 2015, the Recognized Loss \$0.00.
 - d. that was still outstanding as of the close of trading March 24, 2015, the Recognized Loss is the intrinsic value of the Sonus Put Option as of the close of trading on March 24, 2015 *minus* the sale price, where the intrinsic value shall be *the greater of*: (i) \$0.00 or (ii) the strike price of the option *minus* \$8.70.
- III. For each Sonus Put Option sold on March 24, 2015 or later, the Recognized Loss is \$0.00.

No Recognized Loss shall be calculated based upon the sale or writing of any Sonus Put Option that had been previously purchased or acquired.

65. **Maximum Recovery for Options:** Settlement proceeds available for Sonus Call Options purchased during the Settlement Class Period and Sonus Put Options written during the Settlement Class Period shall be limited to a total amount equal to 1% of the Net Settlement Fund.⁸

ADDITIONAL PROVISIONS

66. **Calculation of Claimant's "Recognized Claim":** A Claimant's "Recognized Claim" under the Plan of Allocation will be the sum of his, her, or its Recognized Loss amounts as calculated above with respect to all Sonus Securities.

67. **FIFO Matching:** If a Settlement Class Member made more than one purchase/acquisition or sale of any Sonus Security during the Settlement Class Period, all purchases/acquisitions and sales of the like security shall be matched on a First In, First Out ("FIFO") basis. With respect to Sonus Common Stock and Call Options, Settlement Class Period sales will be matched first against any holdings at the beginning of the Settlement Class Period, and then against purchases/acquisitions in chronological order, beginning with the earliest purchase/acquisition made during the Settlement Class Period. For Sonus Put Options, Settlement Class Period purchases will be matched first to close out positions open at the beginning of the Settlement Class Period, and then against Sonus Put Options sold (written) during the Settlement Class Period in chronological order.

68. **"Purchase/Sale" Dates:** Purchases or acquisitions and sales of Sonus Securities shall be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" date. The receipt or grant by gift, inheritance, or operation of law of Sonus Securities during the Settlement Class Period shall not be deemed a purchase, acquisition, or sale of these Sonus Securities for the calculation of a Claimant's Recognized Loss, nor shall such receipt or grant be deemed an assignment of any claim relating to the purchase/acquisition of such Sonus Securities unless (i) the donor or decedent purchased or otherwise acquired such Sonus Securities during the Settlement Class Period; (ii) the instrument of gift or assignment specifically provides that it is intended to transfer

⁸ Sonus Call and Put Option trading accounted for less than 1% of total dollar trading volume for Sonus Securities during the Settlement Class Period. Consequently, claims for Sonus Call and Put Option transactions are allotted 1% of the Settlement pursuant to the Plan of Allocation.

such rights; and (iii) 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 Sonus Securities.

69. **Short Sales:** With respect to Sonus Common Stock, the date of covering a “short sale” is deemed to be the date of purchase or acquisition of the stock. The date of a “short sale” is deemed to be the date of sale of the Sonus Common Stock. In accordance with the Plan of Allocation, however, the Recognized Loss on “short sales” is zero.

70. In the event that a Claimant has an opening short position in Sonus Common Stock, the earliest purchases or acquisitions of Sonus Common Stock during the Settlement Class Period shall be matched against such opening short position, and shall not be entitled to a recovery, until that short position is fully covered.

71. If a Settlement Class Member has “written” Sonus Call Options, thereby having a short position in the Call Options, the date of covering such a written position is deemed to be the date of purchase or acquisition of the Call Option. The date on which the Sonus Call Option was written is deemed to be the date of sale of the Call Option. In accordance with the Plan of Allocation, however, the Recognized Loss on “written” Sonus Call Options is zero. In the event that a Claimant has an opening written position in Sonus Call Options, the earliest purchases or acquisitions of like Call Options during the Settlement Class Period shall be matched against such opening written position, and shall not be entitled to a recovery, until that written position is fully covered.

72. If a Settlement Class Member has purchased or acquired Sonus Put Options, thereby having a long position in the Put Options, the date of purchase/acquisition is deemed to be the date of purchase/acquisition of the Put Option. The date on which the Sonus Put Option was sold, exercised, or expired is deemed to be the date of sale of the Put Option. In accordance with the Plan of Allocation, however, the Recognized Loss on purchased/acquired Put Options is zero. In the event that a Claimant has an opening long position in Sonus Put Options, the earliest sales or dispositions of like Put Options during the Settlement Class Period shall be matched against such opening position, and not be entitled to a recovery, until that long position is fully covered.

73. **Common Stock Purchased/Sold Through the Exercise of Options:** With respect to Sonus Common Stock purchased or sold through the exercise of an option, the purchase/sale date of the stock is the exercise date of the option and the purchase/sale price of the stock is the closing price of Sonus Common Stock on the exercise date. Any Recognized Loss arising from purchases of Sonus Common Stock acquired during the Settlement Class Period through the exercise of an option on Sonus Common Stock shall be computed as provided for other purchases of Sonus Common Stock in the Plan of Allocation.

74. **Market Gains and Losses:** With respect to all Sonus Common Stock and Sonus Call Options purchased or acquired or Sonus Put Options sold (written) during the Settlement Class Period, the Claims Administrator will determine if the Claimant had a Market Gain or a Market Loss with respect to his, her or its overall transactions in those shares and options during the Settlement Class Period. For purposes of making this calculation, with respect to Sonus Common Stock and Call Options, the Claims Administrator shall determine the difference between (i) the Claimant’s Total Purchase Amount⁹ and (ii) the sum of the Claimant’s Sales Proceeds¹⁰ and the Claimant’s Holding Value.¹¹ For Sonus Common Stock and Call Options, if the Claimant’s Total Purchase Amount *minus* the sum of the Claimant’s Sales Proceeds and the Holding Value is a positive number, that number will be the Claimant’s Market Loss; if the number is a negative number or zero, that number will be the Claimant’s Market Gain. With respect to Sonus Put Options, the Claims Administrator shall determine the difference between (i) the sum of the

⁹ For Sonus Common Stock and Call Options, the “Total Purchase Amount” is the total amount the Claimant paid (excluding all fees, taxes, and commissions) for all such Sonus Securities purchased or acquired during the Settlement Class Period.

¹⁰ For Sonus Common Stock and Call Options, the Claims Administrator shall match any sales of such Sonus Securities during the Settlement Class Period first against the Claimant’s opening position in the like Sonus Securities (the proceeds of those sales will not be considered for purposes of calculating market gains or losses). The total amount received for sales of the remaining like Sonus Securities sold during the Settlement Class Period is the “Sales Proceeds.”

¹¹ For each share of Sonus Common Stock purchased or acquired during the Settlement Class Period that was still held as of the close of trading on March 24, 2015, the Claims Administrator shall ascribe a “Holding Value” of \$8.70. For each Sonus Call Option purchased or acquired during the Settlement Class Period that was still held as of the close of trading on March 24, 2015, the Claims Administrator shall ascribe a “Holding Value” for that option which shall be *the greater of*: (i) \$0.00 or (ii) \$8.70 *minus* the strike price of the option.

Claimant's Total Purchase Amount¹² and the Claimant's Holding Value;¹³ and (ii) the Claimant's Sale Proceeds.¹⁴ For Sonus Put Options, if the sum of the Claimant's Total Purchase Amount and the Claimant's Holding Value *minus* the Claimant's Sales Proceeds is a positive number, that number will be the Claimant's Market Loss; if the number is a negative number or zero, that number will be the Claimant's Market Gain.

75. If a Claimant had a Market Gain with respect to his, her, or its overall transactions in Sonus Securities during the Settlement Class Period, the value of the Claimant's Recognized Claim will be zero, and the Claimant will in any event be bound by the Settlement. If a Claimant suffered an overall Market Loss with respect to his, her, or its overall transactions in Sonus Securities during the Settlement Class Period but that Market Loss was less than the Claimant's Recognized Claim calculated above, then the Claimant's Recognized Claim will be limited to the amount of the Market Loss.

76. **Determination of Distribution Amount:** 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.

77. 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.

78. 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 (*i.e.*, the Recognized Claim will be deemed to be zero) and no distribution will be made to that Authorized Claimant. Any prorated amounts of less than \$10.00 will be included in the pool distributed to those whose prorated payments are \$10.00 or greater.

79. After the initial distribution of the Net Settlement Fund, the Claims Administrator will make reasonable and diligent efforts to have Authorized Claimants cash their distribution checks. To the extent any monies remain in the Net Settlement Fund nine (9) months after the initial distribution, if Lead Counsel, in consultation with the Claims Administrator, determine that it is cost-effective to do so, the Claims Administrator will conduct a re-distribution of the funds remaining after payment of any unpaid fees and expenses incurred in administering the Settlement, including for such re-distribution, to Authorized Claimants who have cashed their initial distributions and who would receive at least \$10.00 from such re-distribution. Additional re-distributions to Authorized Claimants who have cashed their prior checks and who would receive at least \$10.00 on such additional re-distributions may occur thereafter if Lead Counsel, in consultation with the Claims Administrator, determine that additional re-distributions, after the deduction of any additional fees and expenses incurred in administering the Settlement, including for such re-distributions, would be cost-effective. At such time as it is determined that the re-distribution of funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance shall be contributed to non-sectarian, not-for-profit organization(s), to be recommended by Lead Counsel and approved by the Court.

80. Payment pursuant to the Plan of Allocation, or such other plan of allocation as may be approved by the Court, shall be conclusive against all Authorized Claimants, and there shall be no appeal to any court, including the U.S. Court of Appeals for the First Circuit. If you are a Settlement Class Member and you do not exclude yourself from the Settlement Class, you will be deemed to have knowingly and intentionally waived the right to appeal any

¹² For Sonus Put Options, the Claims Administrator shall match any purchases during the Settlement Class Period to close out positions in Sonus Put Options first against the Claimant's opening position in Sonus Put Options (the total amount paid with respect to those purchases will not be considered for purposes of calculating market gains or losses). The total amount paid for the remaining purchases during the Settlement Class Period to close out positions in Put Options is the "Total Purchase Amount."

¹³ For each Sonus Put Option sold (written) during the Settlement Class Period that was still outstanding as of the close of trading on March 24, 2015, the Claims Administrator shall ascribe a "Holding Value" for that option which shall be *the greater of*: (i) \$0.00 or (ii) the strike price of the option *minus* \$8.70.

¹⁴ For Sonus Put Options, the total amount received for put options sold (written) during the Settlement Class Period is the "Sales Proceeds."

decision of the Court with respect to the administration, processing, payment, and determination of Claims and the determination of all controversies relating thereto. No person shall have any claim against Plaintiffs, Lead Counsel, Plaintiffs' damages expert, Defendants, Defendants' Counsel, or any of the other Plaintiffs' Releasees or Defendants' Releasees, or the Claims Administrator or other agent designated by Lead Counsel arising from distributions made substantially in accordance with the Stipulation, the plan of allocation approved by the Court, or further Orders of the Court. Plaintiffs, Defendants, and their respective counsel, and all other Defendants' Releasees, shall have no responsibility or liability whatsoever for the investment or distribution of the Settlement Fund or the Net Settlement Fund; the plan of allocation; the determination, administration, calculation, or payment of any Claim Form or nonperformance of the Claims Administrator; the payment or withholding of Taxes; or any losses incurred in connection therewith.

81. The Plan of Allocation set forth herein is the plan that is being proposed to the Court for its approval by Plaintiffs after consultation with their damages expert. The Court may approve this plan as proposed or it may modify the Plan of Allocation without further notice to the Settlement Class. No Defendant, nor any other Defendants' Releasees, shall have any involvement with or liability, obligation, or responsibility whatsoever for the application of the Court-approved plan of allocation. Any Orders regarding any modification of the Plan of Allocation will be posted on the settlement website, www.strategicclaims.net/Sonus/.

WHAT PAYMENT ARE THE ATTORNEYS FOR THE SETTLEMENT CLASS SEEKING? HOW WILL THE LAWYERS BE PAID?

82. Plaintiffs' Counsel have not received any payment for their services in pursuing claims against the Defendants on behalf of the Settlement Class, nor have Plaintiffs' Counsel been reimbursed for their expenses. Before final approval of the Settlement, Lead Counsel will apply to the Court for an award of attorneys' fees for all Plaintiffs' Counsel in an amount not to exceed 33 $\frac{1}{3}$ % of the Settlement Fund. At the same time, Lead Counsel also intends to apply for reimbursement of Litigation Expenses in an amount not to exceed \$140,000, which may include an application for reimbursement of the reasonable costs and expenses incurred by Plaintiffs directly related to their representation of the Settlement Class in an aggregate amount not to exceed \$30,000. The Court will determine the amount of any award of attorneys' fees or reimbursement of Litigation Expenses. Such sums as may be approved by the Court will be paid from the Settlement Fund. Settlement Class Members are not personally liable for any such fees or expenses.

WHAT IF I DO NOT WANT TO BE A MEMBER OF THE SETTLEMENT CLASS? HOW DO I EXCLUDE MYSELF?

83. Each Settlement Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written Request for Exclusion from the Settlement Class, addressed to *Miller v. Sonus Networks, Inc Securities Litigation*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063. The exclusion request must be **received** no later than April 3, 2024. You will not be able to exclude yourself from the Settlement Class after that date. Each Request for Exclusion must: (a) state the name, address, and telephone number of the person or entity requesting exclusion, and in the case of entities the name and telephone number of the appropriate contact person; (b) state that such person or entity "requests exclusion from the Settlement Class in *Miller v. Sonus Networks, Inc. et al.*, Case No. 1:18-cv-12344-GAO"; and (c) be signed by the person or entity requesting exclusion or an authorized representative. In addition, a request for exclusion must state the number and type of Sonus Securities that the person or entity requesting exclusion purchased, acquired, wrote, and sold during the Settlement Class Period (*i.e.*, from January 8, 2015 and March 24, 2015, both dates inclusive), as well as the dates and prices of each such purchase/acquisition and sale/writing. A Request for Exclusion shall not be valid and effective unless it provides all the information called for in this paragraph and is received within the time stated above, or is otherwise accepted by the Court.

84. If you do not want to be part of the Settlement Class, you must follow these instructions for exclusion even if you have pending, or later file, another lawsuit, arbitration, or other proceeding relating to any Released Plaintiffs' Claim against any of the Defendants' Releasees.

85. If you ask to be excluded from the Settlement Class, you will not be eligible to receive any payment out of the Net Settlement Fund.

86. Defendants have the right to terminate the Settlement if valid requests for exclusion are received from persons and entities entitled to be members of the Settlement Class in an amount that exceeds an amount agreed to by Plaintiffs and Defendants.

WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT? DO I HAVE TO COME TO THE HEARING? MAY I SPEAK AT THE HEARING IF I DON'T LIKE THE SETTLEMENT?

87. **Settlement Class Members do not need to attend the Settlement Hearing. The Court will consider any submission made in accordance with the provisions below even if a Settlement Class Member does not attend the hearing. You can participate in the Settlement without attending the Settlement Hearing.**

88. The Settlement Hearing will be held on April 24, 2024 at 2:00 p.m., before the Honorable George A. O’Toole, Jr. at the United States District Court for the District of Massachusetts, John Joseph Moakley United States Courthouse, Courtroom 22, 1 Courthouse Way, Boston, MA 02210. The Court reserves the right to approve the Settlement, the Plan of Allocation, Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of Litigation Expenses, and/or any other matter related to the Settlement at or after the Settlement Hearing without further notice to the members of the Settlement Class.

89. Any Settlement Class Member who or which does not request exclusion may object to the Settlement, the proposed Plan of Allocation, or Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of Litigation Expenses. Objections must be in writing. You must file any written objection, together with copies of all other papers and briefs supporting the objection, with the Clerk’s Office at the United States District Court for the District of Massachusetts at the address set forth below on or before April 3, 2024. You must also serve the papers on Lead Counsel and on Defendants’ Counsel at the addresses set forth below so that the papers are *received on or before April 3, 2024*.

<p style="text-align: center;"><u>Clerk’s Office</u></p> <p>United States District Court District of Massachusetts Clerk of the Court United States Courthouse 1 Courthouse Way Boston, MA 02210</p>	<p style="text-align: center;"><u>Lead Counsel</u></p> <p>Glancy Prongay & Murray LLP Garth A. Spencer, Esq. 1925 Century Park East Suite 2100 Los Angeles, CA 90067</p> <p>The Rosen Law Firm, P.A. Jacob A. Goldberg, Esq. 101 Greenwood Avenue Suite 440 Jenkintown, PA 19046</p>	<p style="text-align: center;"><u>Sonus’s Counsel</u></p> <p>Wilmer Cutler Pickering Hale and Dorr LLP John F. Batter III, Esq. 60 State Street Boston, MA 02109</p> <p style="text-align: center;"><u>Mr. Dolan’s Counsel</u></p> <p>Mintz, Levin, Cohn, Ferris, Glosky and Popeo, PC John F. Sylvia, Esq. One Financial Center Boston, MA 02111</p> <p style="text-align: center;"><u>Mr. Greenquist’s Counsel</u></p> <p>Morvillo PLLC Gregory Morvillo, Esq. 1740 Broadway, 15th Floor New York, NY 10019</p> <p style="text-align: center;"><u>Mr. Swade’s Counsel</u></p> <p>Sidley Austin LLP Kathryn L. Alessi 60 State Street, 36th Floor Boston, MA 02109</p>
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90. Any objection (a) must state the name, address, and telephone number of the person or entity objecting and must be signed by the objector; (b) must contain a statement of the Settlement Class Member’s objection or objections, and the specific reasons for each objection, including any legal and evidentiary support the Settlement Class Member wishes to bring to the Court’s attention; and (c) must include documents sufficient to prove membership in the Settlement Class, including the number and type of Sonus Securities that the person or entity

objecting purchased, acquired, wrote, and sold during the Settlement Class Period (*i.e.*, from January 8, 2015 and March 24, 2015, both dates inclusive), as well as the dates and prices of each such purchase/acquisition and sale/writing. You may not object to the Settlement, the Plan of Allocation or Lead Counsel's motion for attorneys' fees and reimbursement of Litigation Expenses if you exclude yourself from the Settlement Class or if you are not a member of the Settlement Class.

91. You may file a written objection without having to appear at the Settlement Hearing. You may not, however, appear at the Settlement Hearing to present your objection unless you first file and serve a written objection in accordance with the procedures described above, unless the Court orders otherwise.

92. If you wish to be heard orally at the hearing in opposition to the approval of the Settlement, the Plan of Allocation, or Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses, and if you timely file and serve a written objection as described above, you must also file a notice of appearance with the Clerk's Office and serve it on Lead Counsel and Defendants' Counsel at the addresses set forth above so that it is **received on or before April 3, 2024**. Persons who intend to object and desire to present evidence at the Settlement Hearing must include in their written objection or notice of appearance the identity of any witnesses they may call to testify and exhibits they intend to introduce into evidence at the hearing. Such persons may be heard orally at the discretion of the Court.

93. You are not required to hire an attorney to represent you in making written objections or in appearing at the Settlement Hearing. However, if you decide to hire an attorney, it will be at your own expense, and that attorney must file a notice of appearance with the Court and serve it on Lead Counsel and Defendants' Counsel at the addresses set forth in ¶ 89 above so that the notice is **received on or April 3, 2024**.

94. The Settlement Hearing may be adjourned by the Court without further written notice to the Settlement Class. If you intend to attend the Settlement Hearing, you should confirm the date, time and location on the settlement website www.strategicclaims.net/Sonus/, or with Lead Counsel.

95. Unless the Court orders otherwise, any Settlement Class Member who does not object in the manner described above will be deemed to have waived any objection and shall be forever foreclosed from making any objection to the proposed Settlement, the proposed Plan of Allocation, or Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses. Settlement Class Members do not need to appear at the Settlement Hearing or take any other action to indicate their approval.

WHAT IF I BOUGHT SHARES ON SOMEONE ELSE'S BEHALF?

96. If you purchased or otherwise acquired Sonus Common Stock, and/or Sonus Call Options, and/or wrote Sonus Put Options, from January 8, 2015 and March 24, 2015, both dates inclusive, for the beneficial interest of persons or organizations other than yourself, you must either: (a) within seven (7) calendar days of receipt of the Claims Administrator's notice of the Settlement, request from the Claims Administrator sufficient copies of the Postcard Notice to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Postcard Notices forward them to all such beneficial owners; (b) within seven (7) calendar days of receipt of the Claims Administrator's notice of the Settlement, request a link to the Notice and Claim Form and, within seven (7) calendar days of receipt of the link, email the link to all such beneficial owners for whom valid email addresses are available; or (c) within seven (7) calendar days of receipt of the Claims Administrator's notice of the Settlement, provide a list of the names, mailing addresses and email addresses (to the extent available) of all such beneficial owners to *Miller v. Sonus Networks, Inc. Securities Litigation*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063. If you choose option (c), the Claims Administrator will send a copy of the Postcard Notice, or email a link to the Notice and Claim Form, to the beneficial owners. Nominees that choose to follow procedures (a) or (b) shall also send a statement to the Claims Administrator confirming that the mailing or emailing was made as directed. Upon full compliance with this Order, such nominees may seek reimbursement of their reasonable expenses actually incurred in complying with this Order up to a maximum of \$0.05 per name and address provided to the Claims Administrator; up to \$0.05 per Postcard Notice actually mailed, plus postage at the rate used by the Claims Administrator; or up to \$0.05 per link to the Notice and Claim Form transmitted by email. Any dispute concerning the reasonableness of reimbursement costs shall be resolved by the Court. Copies of this Notice and the Claim Form may be obtained from the website maintained by the Claims Administrator, www.strategicclaims.net/Sonus/, or by calling the Claims Administrator toll-free at 1-866-274-4004.

CAN I SEE THE COURT FILE? WHOM SHOULD I CONTACT IF I HAVE QUESTIONS?

97. This Notice contains only a summary of the terms of the proposed Settlement. For more detailed information about the matters involved in this Action, you are referred to the papers on file in the Action, including the Stipulation, which may be inspected during regular office hours at the Office of the Clerk, United States District Court for the District of Massachusetts, John Joseph Moakley United States Courthouse, 1 Courthouse Way, Boston, MA 02210. Additionally, copies of the Stipulation and any related orders entered by the Court will be posted on the website maintained by the Claims Administrator, www.strategicclaims.net/Sonus/.

All inquiries concerning this Notice and the Claim Form should be directed to the Claims Administrator or Lead Counsel at:

<p><i>Miller v. Sonus Networks, Inc.</i> <i>Securities Litigation.</i> c/o Strategic Claims Services P.O. Box 230 600 N. Jackson Street Suite 205 Media, PA 19063 (866) 274-4004 info@strategicclaims.net www.strategicclaims.net/Sonus/</p>	<p>and/or</p>	<p>Garth A. Spencer, Esq. GLANCY PRONGAY & MURRAY LLP 1925 Century Park East Suite 2100 Los Angeles, CA 90067 (888) 773-9224 settlements@glancylaw.com</p> <p>Jacob A. Goldberg, Esq. THE ROSEN LAW FIRM, P.A. 101 Greenwood Avenue Suite 440 Jenkintown, PA 19046 Telephone: (215) 600-2817 info@rosenlegal.com</p>
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DO NOT CALL OR WRITE THE COURT, THE OFFICE OF THE CLERK OF THE COURT, DEFENDANTS OR THEIR COUNSEL REGARDING THIS NOTICE.

Dated: October 19, 2023

By Order of the Court
 United States District Court
 District of Massachusetts

Miller v. Sonus Networks, Inc. Securities Litigation

c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson Street, Suite 205
Media, PA 19063
Tel.: 866-274-4004
Fax: 610-565-7985
Email: info@strategicclaims.com

Settlement Website: www.strategicclaims.net/Sonus/

PROOF OF CLAIM AND RELEASE FORM

To be eligible to receive a share of the Net Settlement Fund in connection with the Settlement of this Action, you must be a Settlement Class Member and complete and sign this Proof of Claim and Release Form (“Claim Form”) and mail it by first-class mail to the above address, or submit it through the settlement website listed above, **so that it is postmarked or submitted no later than March 15, 2024.**

Failure to submit your Claim Form by the date specified will subject your claim to rejection and may preclude you from being eligible to recover any money in connection with the Settlement.

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

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PART I – CLAIMANT INFORMATION

(Please read General Instructions below before completing this page.)

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.

Beneficial Owner’s Name

Co-Beneficial Owner’s Name

Entity Name (if Beneficial Owner is not an individual)

Representative or Custodian Name (if different from Beneficial Owner(s) listed above)

Address1 (street name and number)

Address2 (apartment, unit or box number)

City

State

Zip Code

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Foreign Country (only if not USA)

Last four digits of Social Security Number or Taxpayer Identification Number

Telephone Number (home)

Telephone Number (work)

<input type="text"/>	<input type="text"/>
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Email address (Email address is not required, but if you provide it, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.):

Account Number (account(s) through which the securities were traded)¹⁵:

Claimant Account Type (check appropriate box):

- | | | |
|---|---------------------------------------|--------------------------------|
| <input type="checkbox"/> Individual (includes joint owner accounts) | <input type="checkbox"/> Pension Plan | <input type="checkbox"/> Trust |
| <input type="checkbox"/> Corporation | <input type="checkbox"/> Estate | |
| <input type="checkbox"/> IRA/401K | <input type="checkbox"/> Other _____ | (please specify) |

¹⁵ If the account number is unknown, you may leave blank. If the same legal entity traded through more than one account you may write “multiple.” Please see paragraph 11 of the General Instructions for more information on when to file separate Claim Forms for multiple accounts, *i.e.*, when you are filing on behalf of distinct legal entities.

PART II – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (the “Notice”) that accompanies this Claim Form, including the Plan of Allocation of the Net Settlement Fund set forth in the Notice. The Notice describes the proposed Settlement, how Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement and Plan of Allocation are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein. These documents can be found online at the settlement website created by the Claims Administrator for this case at www.strategicclaims.net/Sonus/.

2. This Claim Form is directed to all persons and entities that between January 8, 2015, and March 24, 2015, inclusive (the “Settlement Class Period”), purchased or otherwise acquired publicly traded (i) common stock of Sonus Networks, Inc. (“Sonus”) (n/k/a Ribbon Communications, Inc.) (“Sonus Common Stock”), and/or (ii) Sonus call options (“Sonus Call Options”), and/or wrote Sonus put options (“Sonus Put Options”) and suffered economic losses as a proximate result of the alleged wrongdoing (together, the “Settlement Class”). Sonus Common Stock, Call Options, and Put Options are referred to collectively as “Sonus Securities.” All persons and entities that are members of the Settlement Class are referred to as “Settlement Class Members.”

3. Excluded from the Settlement Class are: (i) persons who suffered no compensable losses; and (ii) (a) Defendants; (b) present and former parents, subsidiaries, assigns, successors, predecessors, and affiliates of Sonus;¹⁶ (c) any person who served as an officer and/or director of Sonus during the Settlement Class Period and their Immediate Family members; (d) any entity in which the Defendants have or had a controlling interest; (e) any trust of which an Individual Defendant is the settler or which is for the benefit of an Individual Defendant and/or member(s) of their immediate families; (f) Defendants’ liability insurance carriers; and (g) the legal representatives, heirs, successors, and assigns of any person or entity excluded under provisions (a) through (f) hereof. Also excluded from the Settlement Class are any persons and entities who or which submit a request for exclusion from the Settlement Class that is accepted by the Court.

4. If you are not a Settlement Class Member do not submit a Claim Form. YOU MAY NOT, DIRECTLY OR INDIRECTLY, PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE SETTLEMENT CLASS (AS SET FORTH IN PARAGRAPH 3 ABOVE), ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.

5. If you are a Settlement Class Member, you will be bound by the terms of any judgments or orders entered in the Action WHETHER OR NOT YOU SUBMIT A CLAIM FORM, unless you submit a request for exclusion from the Settlement Class. Thus, if you are a Settlement Class Member, the Judgment will release, and enjoin the filing or continued prosecution of, the Released Plaintiffs’ Claims against the Defendants’ Releases.

6. You are eligible to participate in the distribution of the Net Settlement Fund only if you are a member of the Settlement Class and if you complete and return this form as specified below. If you fail to submit a timely, properly addressed, and completed Claim Form with the required documentation, your claim may be rejected and you may be precluded from receiving any distribution from the Net Settlement Fund.

7. Submission of this Claim Form does not guarantee that you will share in the proceeds of the Settlement. The distribution of the Net Settlement Fund will be governed by the Plan of Allocation set forth in the Notice, if it is approved by the Court, or by such other plan of allocation approved by the Court.

8. Use the Schedules of Transactions in Parts III–V of this Claim Form to supply all required details of your transaction(s) (including free transfers) in and holdings of the applicable Sonus Securities. On the Schedules of Transactions, please provide all of the requested information with respect to your holdings, purchases, acquisitions and sales of the applicable Sonus Securities, whether such transactions resulted in a profit or a loss. Failure to report all transaction and holding information during the requested time periods may result in the rejection of your claim.

¹⁶ For the avoidance of doubt, “affiliates” are persons or entities that directly or indirectly through one or more intermediaries control, are controlled by, or are under common control with one of the Defendants.

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9. Please note: Only Sonus Common Stock and Sonus Call Options purchased/acquired, and Sonus Put Options sold, during the Settlement Class Period (*i.e.*, from January 8, 2015 to March 24, 2015, both dates inclusive) are eligible under the Settlement. However, under the PSLRA “90-Day Lookback Period” (described in the Plan of Allocation set forth in the Notice), your sales of Sonus Common Stock during the period from March 25, 2015, through and including June 22, 2015, will be used for purposes of calculating your Recognized Loss under the Plan of Allocation. Therefore, in order for the Claims Administrator to be able to process your claim, the requested purchase and sale information during the 90-Day Lookback Period must also be provided.

10. You are required to submit genuine and sufficient documentation for all of your transactions and holdings of the applicable Sonus Securities set forth in the Schedules of Transactions in Parts III–V of this Claim Form. Documentation may consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from your broker containing the transactional and holding information found in a broker confirmation slip or account statement. The Parties and the Claims Administrator do not independently have information about your investments in Sonus Securities. **IF SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN COPIES OR EQUIVALENT CONTEMPORANEOUS DOCUMENTS FROM YOUR BROKER. FAILURE TO SUPPLY THIS DOCUMENTATION MAY RESULT IN THE REJECTION OF YOUR CLAIM. DO NOT SEND ORIGINAL DOCUMENTS. Please keep a copy of all documents that you send to the Claims Administrator. Also, please do not highlight any portion of the Claim Form or any supporting documents.**

11. Separate Claim Forms should be submitted for each separate legal entity (*e.g.*, a claim from joint owners should not include separate transactions through an account that is in the name of just one of the joint owners, and an individual should not combine his or her IRA transactions with transactions made through an account in the individual’s name). Conversely, a single Claim Form should be submitted on behalf of one legal entity including all transactions made by that entity on one Claim Form, no matter how many separate accounts that entity has (*e.g.*, a corporation with multiple brokerage accounts should include all transactions made in all accounts on one Claim Form).

12. All joint beneficial owners must sign this Claim Form. If you purchased or otherwise acquired Sonus Common Stock or Sonus Call Options, or sold Sonus Put Options, during the Settlement Class Period and held the securities in your name, you are the beneficial owner as well as the record owner and you must sign this Claim Form to participate in the Settlement. If, however, you purchased or otherwise acquired Sonus Common Stock or Sonus Call Options, or sold Sonus Put Options, during the Settlement Class Period and the securities were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial owner of these securities, but the third party is the record owner. The beneficial owner, not the record owner, must sign this Claim Form.

13. Agents, executors, administrators, guardians, and trustees must complete and sign the Claim Form on behalf of persons represented by them, and they must:

- (a) expressly state the capacity in which they are acting;
- (b) identify the name, account number, Social Security Number (or taxpayer identification number), address and telephone number of the beneficial owner of (or other person or entity on whose behalf they are acting with respect to) the Sonus Securities; and
- (c) furnish herewith evidence of their authority to bind to the Claim Form the person or entity on whose behalf they are acting. (Authority to complete and sign a Claim Form cannot be established by stockbrokers demonstrating only that they have discretionary authority to trade stock in another person’s accounts.)

14. By submitting a signed Claim Form, you will be swearing that you:

- (a) own(ed) the Sonus Securities you have listed in the Claim Form; or
- (b) are expressly authorized to act on behalf of the owner thereof.

15. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or 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.

16. If the Court approves the Settlement, payments to eligible Authorized Claimants pursuant to the Plan of Allocation (or such other plan of allocation as the Court approves) will be made after the completion of all claims processing. This could take substantial time. Please be patient.

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17. PLEASE NOTE: As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her or its pro rata share of the Net Settlement Fund. If the prorated payment to any Authorized Claimant, however, calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

18. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Claims Administrator, Strategic Claims Services, by email at info@strategicclaims.net, or by toll-free phone at (866)-274-4004, or you may download the documents from the Settlement website, www.strategicclaims.net/Sonus/.

19. NOTICE REGARDING ELECTRONIC FILES: Certain Claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. To obtain the mandatory electronic filing requirements and file layout, you may visit the Settlement website at <https://www.strategicclaims.net/institutional-filers/> or you may email the Claims Administrator's electronic filing department at efile@strategicclaims.net. Any file not in accordance with the required electronic filing format will be subject to rejection. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues an email to that effect after processing your file with your claim numbers and respective account information. Do not assume that your file has been received or processed until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the electronic filing department at efile@strategicclaims.net to inquire about your file and confirm it was received and acceptable.

IMPORTANT: PLEASE NOTE

YOUR CLAIM IS NOT DEEMED FILED UNTIL YOU RECEIVE AN ACKNOWLEDGEMENT POSTCARD OR EMAIL. THE CLAIMS ADMINISTRATOR WILL ACKNOWLEDGE RECEIPT OF YOUR CLAIM FORM BY MAIL WITHIN 45 DAYS. IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD OR EMAIL WITHIN 45 DAYS, PLEASE CALL THE CLAIMS ADMINISTRATOR TOLL FREE AT (866)274-4004.

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PART III – SCHEDULE OF TRANSACTIONS IN SONUS COMMON STOCK

Complete this Part III if and only if you purchased/acquired Sonus Common Stock during the period from January 8, 2015 through March 24, 2015, inclusive. Please include proper documentation with your Claim Form as described in detail in Part II – General Instructions, Paragraph 10, above. Do not include information in this section regarding securities other than Sonus Common Stock.

1. BEGINNING HOLDINGS – State the total number of shares of Sonus Common Stock held as of the close of trading on January 7, 2015. (Must be documented.) If none, write “zero” or “0.” _____			
2. PURCHASES/ACQUISITIONS DURING THE SETTLEMENT CLASS PERIOD – Separately list each and every purchase/acquisition (including free receipts) of Sonus Common Stock from after the opening of trading on January 8, 2015, through and including the close of trading on March 24, 2015. (Must be documented.)			
Date of Purchase/Acquisition (List Chronologically) (Month/Day/Year)	Number of Shares Purchased/Acquired	Purchase/Acquisition Price Per Share	Total Purchase/Acquisition Price (excluding taxes, commissions, and fees)
/ /		\$	\$
/ /		\$	\$
/ /		\$	\$
/ /		\$	\$
3. PURCHASES/ACQUISITIONS DURING THE 90-DAY LOOKBACK PERIOD – State the total number of shares of Sonus Common Stock purchased/acquired (including free receipts) from after the opening of trading on March 25, 2015, through and including the close of trading on June 22, 2015. If none, write “zero” or “0.” ¹⁷ _____			
4. SALES DURING THE SETTLEMENT CLASS PERIOD AND DURING THE 90-DAY LOOKBACK PERIOD – Separately list each and every sale/disposition (including free deliveries) of Sonus Common Stock from after the opening of trading on January 8, 2015, through and including the close of trading on June 22, 2015. (Must be documented.)			IF NONE, CHECK HERE <input type="radio"/>
Date of Sale (List Chronologically) (Month/Day/Year)	Number of Shares Sold	Sale Price Per Share	Total Sale Price (excluding taxes, commissions, and fees)
/ /		\$	\$
/ /		\$	\$
/ /		\$	\$
/ /		\$	\$
5. ENDING HOLDINGS – State the total number of shares of Sonus Common Stock held as of the close of trading on June 22, 2015. (Must be documented.) If none, write “zero” or “0.” _____			
If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security or Taxpayer Identification Number at the top of each sheet.			

¹⁷ **Please note:** Information requested with respect to your purchases/acquisitions of Sonus Common Stock from after the opening of trading on March 25, 2015, through and including the close of trading on June 22, 2015, is needed in order to balance your claim; purchases/acquisitions during this period, however, are not eligible under the Settlement and will not be used for purposes of calculating your Recognized Loss pursuant to the Plan of Allocation.

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PART IV– SCHEDULE OF TRANSACTIONS IN SONUS CALL OPTIONS

Complete this Part IV if and only if you purchased/acquired Sonus Call Options during the period from January 8, 2015 through March 24, 2015, inclusive. Please include proper documentation with your Claim Form as described in detail in Part II – General Instructions, Paragraph 10, above. Do not include information in this section regarding securities other than Sonus Call Options.

1. BEGINNING HOLDINGS – Separately list all positions in Sonus Call Option contracts in which you had an open interest as of the close of trading on January 7, 2015. (Must be documented.)			IF NONE, CHECK HERE
Strike Price of Call Option Contract	Expiration Date of Call Option Contract (Month/Day/Year)	Option Class Symbol	Number of Call Option Contracts in Which You Had an Open Interest
\$	/ /		
\$	/ /		
\$	/ /		
\$	/ /		

2. PURCHASES/ACQUISITIONS DURING THE SETTLEMENT CLASS PERIOD – Separately list each and every purchase/acquisition (including free receipts) of Sonus Call Option contracts from after the opening of trading on January 8, 2015, through and including the close of trading on March 24, 2015. (Must be documented.)

Date of Purchase/Acquisition (List Chronologically) (Month/Day/Year)	Strike Price of Call Option Contract	Expiration Date of Call Option Contract (Month/Day/Year)	Option Class Symbol	Number of Call Option Contracts Purchased/Acquired	Purchase/Acquisition Price Per Call Option Contract	Total Purchase/Acquisition Price (excluding taxes, commissions, and fees)	Insert an “E” if Exercised Insert an “A” if Assigned Insert an “X” if Expired	Exercise Date (Month/Day/Year)
/ /	\$	/ /			\$	\$		/ /
/ /	\$	/ /			\$	\$		/ /
/ /	\$	/ /			\$	\$		/ /
/ /	\$	/ /			\$	\$		/ /

3. SALES DURING THE SETTLEMENT CLASS PERIOD – Separately list each and every sale/disposition (including free deliveries) of Sonus Call Options from after the opening of trading on January 8, 2015, through and including the close of trading on March 24, 2015. (Must be documented.)

IF NONE, CHECK HERE

○

Date of Sale (List Chronologically) (Month/Day/Year)	Strike Price of Call Option Contract	Expiration Date of Call Option Contract (Month/Day/Year)	Option Class Symbol	Number of Call Option Contracts Sold	Sale Price Per Call Option Contract	Total Sale Price (excluding taxes, commissions, and fees)
/ /	\$	/ /			\$	\$
/ /	\$	/ /			\$	\$
/ /	\$	/ /			\$	\$
/ /	\$	/ /			\$	\$

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4. ENDING HOLDINGS – Separately list all positions in Sonus Call Option contracts in which you had an open interest as of the close of trading on March 24, 2015. (Must be documented.)			IF NONE, CHECK HERE <input type="checkbox"/>
Strike Price of Call Option Contract	Expiration Date of Call Option Contract (Month/Day/Year)	Option Class Symbol	Number of Call Option Contracts in Which You Had an Open Interest
\$	/ /		
\$	/ /		
\$	/ /		
\$	/ /		

If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security or Taxpayer Identification Number at the top of each sheet.

PART V – SCHEDULE OF TRANSACTIONS IN SONUS PUT OPTIONS

Complete this Part V if and only if you sold (wrote) Sonus Put Options during the period from January 8, 2015 through March 24, 2015, inclusive. Please include proper documentation with your Claim Form as described in detail in Part II – General Instructions, Paragraph 10, above. Do not include information in this section regarding securities other than Sonus Put Options.

1. BEGINNING HOLDINGS – Separately list all positions in Sonus Put Option contracts in which you had an open interest as of the close of trading on January 7, 2015. (Must be documented.)			IF NONE, CHECK HERE <input type="checkbox"/>	
Strike Price of Put Option Contract	Expiration Date of Put Option Contract (Month/Day/Year)	Option Class Symbol	Number of Put Option Contracts in Which You Had an Open Interest	
\$	/ /			
\$	/ /			
\$	/ /			
\$	/ /			

2. SALES (WRITING) DURING THE SETTLEMENT CLASS PERIOD – Separately list each and every sale (writing) (including free deliveries) of Sonus Put Option contracts from after the opening of trading on January 8, 2015, through and including the close of trading on March 24, 2015. (Must be documented.)								
Date of Sale (Writing) (List Chronologically) (Month/Day/Year)	Strike Price of Put Option Contract	Expiration Date of Put Option Contract (Month/Day/Year)	Option Class Symbol	Number of Put Option Contracts Sold (Written)	Sale Price Per Put Option Contract	Total Sale Price (excluding taxes, commissions, and fees)	Insert an “A” if Assigned Insert an “E” if Exercised Insert an “X” if Expired	Exercise Date (Month/Day/Year)
/ /	\$	/ /				\$		/ /
/ /	\$	/ /				\$		/ /
/ /	\$	/ /				\$		/ /
/ /	\$	/ /				\$		/ /

SONUS

3. PURCHASES/ACQUISITIONS DURING THE SETTLEMENT CLASS PERIOD – Separately list each and every purchase/acquisition (including free receipts) of Sonus Put Option contracts from after the opening of trading on January 8, 2015, through and including the close of trading on March 24, 2015. (Must be documented.)						IF NONE, CHECK HERE ○
Date of Purchase/ Acquisition (List Chronologically) (Month/Day/Year)	Strike Price of Put Option Contract	Expiration Date of Put Option Contract (Month/Day/ Year)	Option Class Symbol	Number of Put Option Contracts Purchased/ Acquired	Purchase/ Acquisition Price Per Put Option Contract	Total Purchase/ Acquisition Price (excluding taxes, commissions, and fees)
/ /	\$	/ /				\$
/ /	\$	/ /				\$
/ /	\$	/ /				\$
/ /	\$	/ /				\$
4. ENDING HOLDINGS – Separately list all positions in Sonus Put Option contracts in which you had an open interest as of the close of trading on March 24, 2015. (Must be documented.)						IF NONE, CHECK HERE ○
Strike Price of Put Option Contract	Expiration Date of Put Option Contract (Month/Day/Year)	Option Class Symbol	Number of Put Option Contracts in Which You Had an Open Interest			
\$	/ /					
\$	/ /					
\$	/ /					
\$	/ /					
If additional space is needed, attach separate, numbered sheets, giving all required information, substantially in the same format, and print your name and Social Security or Taxpayer Identification Number at the top of each sheet.						

PART VI – RELEASE OF CLAIMS AND SIGNATURE**YOU MUST ALSO READ THE RELEASE AND CERTIFICATION BELOW AND SIGN ON PAGE 29 OF THIS CLAIM FORM.**

I (we) hereby acknowledge that as of the Effective Date of the Settlement, pursuant to the terms set forth in the Stipulation, I (we), on behalf of myself (ourselves) and on behalf of any other person or entity legally entitled to bring Released Plaintiffs' Claims (as defined in the Stipulation and in the Notice) on my (our) in such capacity only, shall be deemed to have, and by operation of law and of the judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Plaintiffs' Claim against Defendants and the other Defendants' Releasees (as defined in the Stipulation and in the Notice), and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiffs' Claims against any of the Defendants or any of the other Defendants' Releasees.

CERTIFICATION

By signing and submitting this Claim Form, the Claimant(s) or the person(s) who represent(s) the Claimant(s) certifies (certify), as follows:

1. that I (we) have read and understand the contents of the Notice and this Claim Form, including the releases provided for in the Settlement and the terms of the Plan of Allocation;
2. that the Claimant(s) is a (are) Settlement Class Member(s), as defined in the Notice and in paragraph 2 on page 22 of this Claim Form, and is (are) not excluded from the Settlement Class by definition or pursuant to request as set forth in the Notice and in paragraph 3 on page 22 of this Claim Form;
3. that I (we) own(ed) the Sonus Common Stock and Sonus Call Options and had an interest in the Sonus Put Options identified in the Claim Form and have not assigned the claim against the Defendants' Releasees to another, or that, in signing and submitting this Claim Form, I (we) have the authority to act on behalf of the owner(s) thereof;

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4. that the Claimant(s) submit(s) to the jurisdiction of the Court with respect to Claimant’s (Claimants’) claim and for purposes of enforcing the releases set forth herein;
5. that I (we) agree to furnish such additional information with respect to this Claim Form as Lead Counsel, the Claims Administrator or the Court may require;
6. that the Claimant(s) waive(s) the right to trial by jury, to the extent it exists, and agree(s) to the Court’s summary disposition of the determination of the validity or amount of the claim made by this Claim Form;
7. that I (we) acknowledge that the Claimant(s) will be bound by and subject to the terms of any judgment(s) that may be entered in the Action; and
8. that the Claimant(s) is (are) NOT subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code because (a) the Claimant(s) is (are) exempt from backup withholding or (b) the Claimant(s) has (have) not been notified by the IRS that he/she/it/they is (are) subject to backup withholding as a result of a failure to report all interest or dividends or (c) the IRS has notified the Claimant(s) that he/she/it/they is (are) no longer subject to backup withholding. **If the IRS has notified the Claimant(s) that he, she, it, or they is (are) subject to backup withholding, please strike out the language in the preceding sentence indicating that the claim is not subject to backup withholding in the certification above.**

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

Signature of Claimant Date

Print your name here

Signature of joint Claimant, if any Date

Print your name here

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

Signature of person signing on behalf of Claimant Date

Print your name here

Capacity of person signing on behalf of claimant, if other than an individual, *e.g.*, executor, president, trustee, custodian, *etc.* (Must provide evidence of authority to act on behalf of claimant – see paragraph 13 on page 23 of this Claim Form.)

THIS PROOF OF CLAIM MUST BE SUBMITTED ELECTRONICALLY AT WWW.STRATEGICCLAIMS.NET/SONUS/ BY 11:59 P.M. EST ON MARCH 15, 2024, OR MAILED TO THE CLAIMS ADMINISTRATOR AT THE BELOW ADDRESS, POSTMARKED NO LATER THAN MARCH 15, 2024:

Miller v. Sonus Networks, Inc. Securities Litigation
 c/o Strategic Claims Services
 P.O. Box 230
 600 N. Jackson Street, Suite 205
 Media, PA 19063
 Tel.: 866-274-4004
 Fax: 610-565-7985
 info@strategicclaims.net

A Claim Form received by the Claims Administrator shall be deemed to have been submitted when posted, if a postmark date on or before March 15, 2024 is indicated on the envelope and it is mailed First Class, and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Claims Administrator.

You should be aware that it will take a significant amount of time to fully process all of the Claim Forms. Please be patient and notify the Claims Administrator of any change of address.

Miller v. Sonus Networks, Inc. Securities Litigation
c/o Strategic Claims Services
600 N. Jackson Street, Suite 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

REMINDER CHECKLIST:

1. Please sign the above release and certification on page 29. If this Claim Form is being made on behalf of joint Claimants, then both must sign.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Do not send original security certificates or documentation. These items cannot be returned to you by the Claims Administrator.
5. Keep copies of the completed Claim Form and documentation for your own records.
6. The Claims Administrator will acknowledge receipt of your Claim Form by mail or email within 45 days. Your claim is not deemed filed until you receive an acknowledgement postcard or email. **If you do not receive an acknowledgement postcard or email within 45 days, please call the Claims Administrator toll free at (866) 274-4004.**
7. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please submit the new information to the Claims Administrator. If you change your name, please inform the Claims Administrator.
8. If you have any questions or concerns regarding your claim, please contact the Claims Administrator at the address below, by email at info@strategicclaims.net, or toll-free at (866) 274-4004, or visit www.strategicclaims.net/Sonus/. Please **DO NOT** call Sonus or the Individual Defendants or their counsel with questions regarding your claim.

RON MILLER, individually and on behalf of all others similarly situated,

Plaintiff

SONUS NETWORKS, INC., RAYMOND P. DOLAN, MARK T. GREENQUIST,

AND MICHAEL SWADE,

Defendants.

Filed 03/20/24 Pa

Case No. 1:18-cv-12344-GAO

SUMMARY NOTICE OF (I) PENDENCY OF CLASS ACTION, CERTIFICATION OF SETTLEMENT CLASS, AND PROPOSED SETTLEMENT; (II) SETTLEMENT FAIRNESS HEARING; AND (III) MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

TO: All persons and entities that purchased or otherwise acquired the publicly traded common stock of Sonus Networks, Inc. ("Sonus") (n/k/a Ribbon Communications, Inc.) ("Sonus Common Stock"), and/or purchased or otherwise acquired publicly traded Sonus call options ("Sonus Call Options"), and/or wrote publicly traded Sonus put options ("Sonus Put Options," and collectively with Sonus Common Stock and Sonus Call Options, "Sonus Securities"), during the period between January 8, 2015 and March 24, 2015, both dates inclusive ("Settlement Class Period"), and who suffered economic losses as a proximate result of the alleged wrongdoing (the "Settlement Class")¹:

PLEASE READ THIS NOTICE CAREFULLY, YOUR RIGHTS WILL 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 District of Massachusetts, that the above-captioned litigation (the "Action") has been certified as a class action on behalf of the Settlement Class, except for certain persons and entities who are excluded from the Settlement Class by definition as set forth in the full Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (the "Notice").

YOU ARE ALSO NOTIFIED that Plaintiffs in the Action have reached a proposed settlement of the Action for \$4,500,000 in cash (the "Settlement"), that, if approved, will resolve all claims in the Action.

A hearing will be held on April 24, 2024 at 2:00 p.m., before the Honorable George A. O'Toole, Jr. at the United States District Court for the District of Massachusetts, John Joseph Moakley U.S. Courthouse, Courtroom 22, 1 Courthouse Way, Boston, Massachusetts 02210, to determine (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) whether the Action should be dismissed with prejudice against Defendants, and the Releases specified and described in the Stipulation (and in the Notice) should be granted; (iii) whether the proposed Plan of Allocation should be approved as fair and reasonable; and (iv) whether Lead Counsel's application for an award of attorneys' fees and reimbursement of expenses should be approved.

If you are a member of the Settlement Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Settlement Fund. The Notice, and Proof of Claim and Release Form ("Claim Form"), can be downloaded from the website maintained by the Claims Administrator, www.strategicclaims.net/Sonus/. You may also obtain copies of the Notice and Claim Form by contacting the Claims Administrator at *Miller v. Sonus Networks, Inc. Securities Litigation*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063, 1-866-274-4004

If you are a member of the Settlement Class, in order to be eligible to receive a payment under the proposed Settlement, you must submit a Claim Form *postmarked or submitted online* no later than March 15, 2024. If you are a Settlement Class Member and do not submit a proper Claim Form, you will not be eligible to share in the distribution of the net proceeds of the Settlement, but you will nevertheless be bound by any judgments or orders entered by the Court in the Action.

If you are a member of the Settlement Class and wish to exclude yourself from the Settlement Class, you must submit a request for exclusion such that it is *received* no later than April 3, 2024, in accordance with the instructions set forth in the Notice. If you properly exclude yourself from the Settlement Class, you will not be bound by any judgments or orders entered by the Court in the Action and you will not be eligible to share in the proceeds of the Settlement.

Any objections to the proposed Settlement, the proposed Plan of Allocation, or Lead Counsel's motion for attorneys' fees and reimbursement of expenses, must be filed with the Court and delivered to Lead Counsel and Defendants' Counsel such that they are *received* no later than April 3, 2024, in accordance with the instructions set forth in the Notice.

All capitalized words and terms not defined in this notice shall have the meanings stated in the Stipulation, which can be downloaded from www.strategicclaims.net/Sonus/.

Please do not contact the Court, the Clerk's office, Sonus, or its counsel regarding this notice. All questions about this notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed to Lead Counsel or the Claims Administrator.

Requests for the Notice and Claim Form should be made to:

Miller v. Sonus Networks, Inc. Securities Litigation.

c/o Strategic Claims Services

P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063

866-274-4004, www.strategicclaims.net/Sonus/

Inquiries, other than requests for the Notice and Claim Form, should be made to Lead Counsel:

GLANCY PRONGAY & MURRAY LLP

Attn: Garth A. Spencer, Esq.

1925 Century Park East, Suite 2100

Los Angeles, CA 90067

(888) 773-9224, settlements@glancylaw.com

THE ROSEN LAW FIRM, P.A.

Attn: Jacob A. Goldberg

101 Greenwood Avenue, Suite 440

Jenkintown, PA 19046

Telephone: (215) 600-2817, info@rosenlegal.com

By Order of the Court

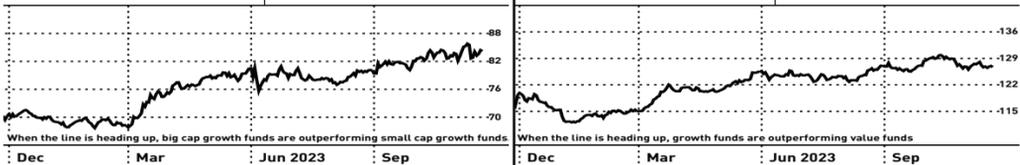
¹ All capitalized terms used in this Summary Notice that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated July 21, 2023 (the "Stipulation"), which is available at www.strategicclaims.net/Sonus/.

BIG CAP GROWTH ETF (SPYG) VS SMALL CAP GROWTH ETF (SLYG)

Apple Inc (AAPL)	12.43%	NeoGenomics Inc (NEO)	1.35%
Microsoft Corp (MSFT)	10.02%	Cleveland-Cliffs Inc (CLF)	1.31%
Amazon.com Inc (AMZN)	8.27%	Yeti Holdings Inc (YETI)	1.16%
Facebook Inc CL A (FB)	3.91%	Omniceil Inc (OMCL)	1.14%
Tesla Inc (TSLA)	3.19%	Brooks Automation (BRKS)	1.13%

GROWTH ETF (IUSG) VS VALUE ETF (IUSV)

Apple Inc (AAPL)	11.88%	Berkshire Hathaway (BRKB)	2.84%
Microsoft Corp (MSFT)	9.42%	J P Morgan Chase (JPM)	2.43%
Amazon.com Inc (AMZN)	7.78%	Walt Disney Company (DIS)	2.06%
Facebook Inc CL A (FB)	3.68%	Johnson & Johnson (JNJ)	1.56%
Tesla Inc (TSLA)	3.00%	Verizon Communications (VZ)	1.53%



Top Growth Funds

Last 3 months (all total returns)

Mutual Fund	Performance % Change Last 3 Mo	Rating 3 mos	\$ Net Assets
ProFunds:UltraNASDAQ	+13	A+	602.50 mil
Rydex:NASDAQ 2x	+12	A+	564.30 mil
MainStay:Wnslw LCG	+9	A-	1.173 bil
Fidelity Sel Comm Serv	+9	B	1.014 bil
TRowePrice Gbl Tech	+9	E	2.141 bil
Baron Fifth Ave Gro	+9	E	332.90 mil
PGIM Jenn Focused Gr	+9	C-	831.20 mil
BlackRock:LC Foc Gro	+9	B+	789.30 mil
Harbor:Cap Apprec	+9	B	14.612 bil
Gabelli Growth	+9	B	615.80 mil
Marsico Inv Fd:Grow	+9	B-	260.50 mil
Marsico Inv Fd:Gblb	+9	C-	142.70 mil
TRowePrice I LC Cor Gr	+9	B-	2.651 bil
J Hancock II:BC Gro	+9	B-	1.473 bil
TRowePrice Blue Chp Gro	+9	B	26.288 bil
J Hancock II:Cap Ap	+9	B	845.70 mil
PGIM Jenn Growth	+9	B	1.485 bil
Invest:House Growth	+9	B	178.50 mil
Touchstone:Sel Gro	+9	E	600.90 mil
Alger Inst:Cap App	+9	B-	1.016 bil
Alger:Capital Apprec	+9	B-	758.70 mil
BlackRock:Cap App	+9	B	1.725 bil
BlackRock:Tech Oppt	+9	D+	2.221 bil
Frost Gro Eqty	+8	A	242.10 mil
Columbia:LgCp Gro	+8	A	2.204 bil

Top Growth Funds

Last 3 years (all total returns)

Mutual Fund	Performance % Change YTD	Rating 3 years	\$ Net Assets
Kinetics:SC Oppty	-15	A+	226.40 mil
Third Avenue:Value	+9	A+	689.20 mil
Hennessy:Crnst MdCp	+23	A+	312.80 mil
Kinetics:Paradigm	-17	A+	375.80 mil
Overweis:Micro-Cap	+6	A+	215.50 mil
Hotchkis:Sm Cap Val	+8	A+	651.80 mil
Avantis US SCV	+9	A+	418.60 mil
BlackRock:Exchange	+18	A+	212.50 mil
Overweis:Sm-Cap Opp	+9	A+	243.90 mil
FMI:Common Stock	+15	A+	531.60 mil
Gotham Index Plus	+23	A+	450.60 mil
Undsc Mgr:Beh Val	+3	A+	2.323 bil
Fidelity Value Strat	+10	A+	577.10 mil
Victory:RS Partners	+7	A+	224.90 mil
Victory:Integrity SCV	+7	A+	700.80 mil
Hennessy:Crnst Gro	+11	A+	149.00 mil
AMG RR Mid Cap Val	+13	A+	232.20 mil
Fidelity Value Fund	+8	A+	6.931 bil
Columbia:Sel Gl Tch	+35	A+	1.1 bil
Fidelity Sel Cnst&Hous	+15	A+	589.00 mil
Fidelity Adv Val	+8	A+	142.70 mil
Pear Tree:Quality	+25	A+	133.50 mil
GO:Quality	+26	A+	2.662 bil
Northern Fds:Lg Cp Core	+19	A+	238.40 mil
Third Avenue:SC Val	+9	A+	170.00 mil

U.S. Stock Fund Cash Position

High (11/00)	6.2%	Low (12/21)	1.5%
22-Mar	2.00%	22-Sep	2.50%
22-Apr	2.10%	22-Oct	2.50%
22-May	2.20%	22-Nov	2.50%
22-Jun	2.40%	22-Dec	2.40%
22-Jul	2.40%	23-Jan	2.30%
22-Aug	2.50%	23-Feb	2.26%

36 Mo Performance Rating	YTD 12Wk % Chg	5Yr % After Tax Rtn	5Yr Net Asset Value	NAV		
A	Eq 500 Ix	+20	+3	-176.04%	0.71	
A	Latin Am Eq	+23	+2	+6	33.95%	0.06
A	S&P 500 Ix	+20	+3	-41	30%	0.16
A	Div Bldr	+5	+1	+6	14.34	0.06
A	Gro	+34	+6	+7	35.27	0.19
A	TM Eq AA	+14	+2	+5	29.23	0.14
A	TM Gl Dv	+19	+3	+6	15.23	0.06
A	TM Val	+2	-1	+4	35.19	0.16
A	TMGL1	+23	+4	+9	2031.22	0.64
A	TMGL1	+23	+4	+7	91.62	0.43
A	TMGL2	+23	+4	+7	41.17	0.20
A	AC SMID	+5	+1	+7	36.65	0.17
A	Flt Rtr	+10	+2	+2	8.36	0.01
A	Bl M AR	+5	+0	+2	8.17	0.01
A	C Inc Bstn	+8	+2	+1	4.97	0.01
A	LC Val	+1	-2	+6	22.68	0.11
A	D Nat Mu I	+3	+1	+1	9.02	0.03
A	AG 500 Index Fun	+20	+3	+9	158.51	0.65
A	Emerg Mkts Idx	+5	+1	+1	9.93	-0.03
A	Extended Mkt	+11	+0	+4	70.15	0.44
A	Flex 500 Index	+20	+3	+9	19.48	0.08
A	Flex Intl Ind	+9	+2	+3	12.26	0.00
A	Flex US Bond I	+1	+0	+0	8.82	0.00
A	Flt Rtr	+5	+1	+6	89.98	0.25
A	Fairholme	+33	+10	+11	32.83	0.35
A	Focused Inc	+11	+3	+4	12.30	0.04
A	FAM Divident Focus	+5	+1	+8	51.00	0.17
A	Divident Foc	+14	+3	+8	51.00	0.17
A	FAM Value	+1	+1	+8	89.98	0.25
A	Fairholme	+33	+10	+11	32.83	0.35
A	Focused Inc	+11	+3	+4	12.30	0.04
A	FAM Divident Focus	+5	+1	+8	51.00	0.17
A	Divident Foc	+14	+3	+8	51.00	0.17
A	FAM Value	+1	+1	+8	89.98	0.25

36 Mo Performance Rating	YTD 12Wk % Chg	5Yr % After Tax Rtn	5Yr Net Asset Value	NAV		
A	Global ex USI	+9	+2	+3	13.73	0.00
A	Int'l Prot Bdl	+1	+0	+1	9.09	0.01
A	Int'l Trs Bldx	+0	+0	+0	9.40	-0.01
B	Int'l Bond	+12	+2	+3	45.93	0.07
A	Lgt Trs Bldx	-5	-3	-3	9.33	0.02
A	Lrg Cap Grold	+37	+6	+11	28.44	0.13
A	Lrg Cap Valid	+4	+0	+5	15.37	0.07
B+	MidCap Indx	+7	+0	+5	27.73	0.14
A	MidCap Valid	+3	-1	+3	23.23	0.11
C	Real Estate	-0	-1	0	14.25	0.06
A	SAIEM Index	+5	+1	+1	12.82	0.04
B	SAIEM Vldx	+10	+1	+1	10.71	-0.04
C	SAIEM Vldx	+11	+3	+3	12.03	0.05
A	SAIEM Vldx	-8	-3	-3	89.18	-0.90
A	SAIEM Vldx	+12	+2	+3	9.41	0.01
A	SAIEM Vldx	+11	+2	+3	13.10	0.02
C	SAIEM Vldx	+9	+2	+2	10.67	0.01
E	SAIEM Vldx	-6	-4	-3	6.92	0.02
C	SAIEM Vldx	+3	+1	+1	9.59	0.03
B	SAIEM Vldx	+2	+6	+5	5.56	0.03
D	SAIEM Vldx	+3	+1	+1	9.54	0.00
D	SAIEM Vldx	+3	+1	+1	9.75	0.02
C	SAIEM Vldx	+2	+0	+0	8.70	0.00
A	SAIEM Vldx	+20	+3	+7	18.53	0.08
A	SAIEM Vldx	+9	+6	+7	13.17	0.04
A	SAIEM Vldx	+24	+4	+9	18.79	0.07
A	SAIEM Vldx	+0	+0	+0	8.52	0.00
A	SAIEM Vldx	+5	+1	+5	10.20	0.05
D	SAIEM Vldx	+3	+1	+1	9.60	0.00
D	SAIEM Vldx	+2	+1	+0	9.95	0.00
A	SAIEM Vldx	+1	-2	+1	21.48	0.14
C	SAIEM Vldx	+4	+1	+3	22.38	0.15
E	SAIEM Vldx	+0	+0	+0	8.71	0.00
A	SAIEM Vldx	+2	+1	+0	8.31	-0.01
E	SAIEM Vldx	-5	-4	-2	5.39	0.01
A	SAIEM Vldx	+19	+3	+3	15.01	0.07
C	SAIEM Vldx	+5	+1	+1	9.94	0.00
C	SAIEM Vldx	+9	+2	+3	12.77	0.00
A	SAIEM Vldx	+19	+3	+8	126.00	0.56
E	SAIEM Vldx	+0	+0	+0	10.01	0.00
A	SAIEM Vldx	+23	+4	+9	20.49	0.07
B	SAIEM Vldx	+5	-2	+4	11.08	0.07
C	SAIEM Vldx	+10	+2	+3	10.78	0.00
A	SAIEM Vldx	+21	+3	+9	16.26	0.06
A	SAIEM Vldx	+2	-2	+8	46.77	-0.14
A	SAIEM Vldx	+2	+1	+1	19.01	0.10
A	SAIEM Vldx	+4	+1	+4	27.76	-0.08
B	SAIEM Vldx	+10	+2	+2	9.20	0.00
A	SAIEM Vldx	-9	-3	-3	16.70	-0.13
C	SAIEM Vldx	+37	+5	+12	133.83	0.68
D	SAIEM Vldx	-4	-4	+4	61.33	0.55
D	SAIEM Vldx	+2	+1	+1	9.91	0.02
C	SAIEM Vldx	+19	+4	+6	27.91	0.12
C	SAIEM Vldx	+14	+2	+5	18.04	0.15
E	SAIEM Vldx	+2	+0	+0	6.97	0.01
A	SAIEM Vldx	+5	+8	+4	34.17	0.17
A	SAIEM Vldx	+31	+5	+6	17.92	0.08
E	SAIEM Vldx	+2	+0	+0	9.19	0.01
A	SAIEM Vldx	+2	-2	+8	46.77	-0.14
A	SAIEM Vldx	+2	+1	+1	19.01	0.10
A	SAIEM Vldx	+4	+1	+4	27.76	-0.08
B	SAIEM Vldx	+10	+2	+2	9.20	0.00
A	SAIEM Vldx	-9	-3	-3	16.70	-0.13
C	SAIEM Vldx	+37	+5	+12	133.83	0.68
D	SAIEM Vldx	-4	-4	+4	61.33	0.55
D	SAIEM Vldx	+2	+1	+1	9.91	0.02
C	SAIEM Vldx	+19	+4	+6	27.91	0.12
C	SAIEM Vldx	+14	+2	+5	18.04	0.15
E	SAIEM Vldx	+2	+0	+0	6.97	0.01
A	SAIEM Vldx	+5	+8	+4	34.17	0.17
A	SAIEM Vldx	+31	+5	+6	17.92	0.08
E	SAIEM Vldx	+2	+0	+0	9.19	0.01
A	SAIEM Vldx	+2	-2	+8	46.77	-0.14
A	SAIEM Vldx	+2	+1	+1	19.01	0.10
A	SAIEM Vldx	+4	+1	+4	27.76	-0.08
B	SAIEM Vldx	+10	+2	+2	9.20	0.00
A	SAIEM Vldx	-9	-3	-3	16.70	-0.13
C	SAIEM Vldx	+37	+5	+12	133.83	0.68
D	SAIEM Vldx	-4	-4	+4	61.33	0.55
D	SAIEM Vldx	+2	+1	+1	9.91	0.02
C	SAIEM Vldx	+19	+4	+6	27.91	0.12
C	SAIEM Vldx	+14	+2	+5	18.04	0.15
E	SAIEM Vldx	+2	+0	+0	6.97	0.01
A	SAIEM Vldx	+5	+8	+4	34.17	0.17
A	SAIEM Vldx	+31	+5	+6	17.92	0.08
E	SAIEM Vldx	+2	+0	+0	9.19	0.01

36 Mo Performance Rating	YTD 12Wk % Chg	5Yr % After Tax Rtn	5Yr Net Asset Value	NAV	
B	Freedom2040+13	+2	+5	10.03	0.02
B	Freedom2045+14	+2	+5	11.54	

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Monday, November 27, 2023 9:00 AM
mcraig@strategicclaims.net
PR Newswire: Press Release Distribution Confirmation for Glancy Prongay & Murray LLP.
ID#4019628-1-1

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EXHIBIT 2

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**DECLARATION OF LEAD PLAINTIFF GARY WILLIAMS IN SUPPORT OF:
(1) 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 REIMBURSEMENT OF LITIGATION
EXPENSES**

I, Gary Williams, declare as follows:

1. I am one of the Court-appointed Lead Plaintiff in the above-captioned securities class action (the “Action”).¹ ECF No. 41. I respectfully submit this declaration in support of: (a) Plaintiffs’ motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation; and (b) Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses, including approval of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein, as I have been directly involved in monitoring and overseeing the prosecution of the Action, as well as the negotiations leading to the Settlement, and I could and would testify competently to these matters.

I. LEAD PLAINTIFF’S OVERSIGHT OF THE LITIGATION

3. I have been actively involved in the prosecution of this case since June 21, 2019, when the Court appointed me to serve as one of the Lead Plaintiffs in this Action. ECF No. 41.

4. In fulfillment of my responsibilities as a Lead Plaintiff, I have worked closely with Lead Counsel regarding the litigation and resolution of this case.

5. Throughout the litigation, I received status reports from Lead Counsel on case developments, and participated in regular discussions concerning the prosecution of the Action, the strengths of and risks to the claims, and potential settlement. In particular, I: (a) regularly

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated July 21, 2023. ECF No. 122-1.

communicated with my attorneys regarding the posture and progress of the case, as well as strategy; (b) compiled and produced trading records to my attorneys; (c) provided relevant documents to my attorneys for production to the Defendants; (d) provided information to my attorneys to respond to Defendants' interrogatories; (e) prepared for and gave a deposition; (f) reviewed pleadings and briefs filed in the Action; (g) reviewed Court Orders; (h) prepared for the mediation by, among other things, discussing with counsel the mediation statements and mediation strategy; (i) made myself available during the mediation and consulted with counsel regarding settlement negotiations; (j) evaluated the Settlement Amount, conferred with counsel, and ultimately approved the Settlement; and (k) communicated with counsel regarding the process of finalizing the Settlement.

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. APPROVAL OF THE SETTLEMENT

7. As detailed in the paragraphs above, through my active participation I was both well-informed of the status and progress of the litigation, and the status and progress of the settlement negotiations in this Action.

8. Based on my involvement in the prosecution and resolution of the claims asserted in the Action, I believe that the proposed Settlement provides a fair, reasonable, and adequate recovery for the Settlement Class, particularly in light of the risks of continued litigation, and I fully endorse approval of the Settlement by the Court.

III. LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

A. Attorneys’ Fees And Litigation Expenses

9. I believe Lead Counsel’s request for an award of attorneys’ fees in the amount of 33⅓% of the Settlement Fund is fair and reasonable in light of the work Plaintiffs’ Counsel performed on behalf of the Settlement Class.

10. I have evaluated Plaintiffs’ Counsel’s fee request by considering the quality and amount of the work performed, the recovery obtained for the Settlement Class, and the risks Plaintiffs’ Counsel bore in prosecuting this Action on behalf of myself, the other Plaintiffs, and the Settlement Class on a fully contingent basis, which included the fronting of all expenses. I have authorized this fee request for the Court’s ultimate determination.

11. I further believe the litigation expenses for which Lead Counsel has requested reimbursement are reasonable, and represent costs and expenses necessary for the prosecution and resolution of the claims in the Action. Based on the foregoing, and consistent with my obligation to the Settlement Class to obtain the best result at the most efficient cost, I fully support Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses.

B. Lead Plaintiff’s Litigation-Related Costs And Expenses

12. I understand that reimbursement of a class representative’s reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel’s request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

13. I am a retired marketing research manager, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent investing, managing

my rental property, or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$10,000 for the time I devoted to participating in this Action. I make this request based on the conservative effort that I devoted approximately 115 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

IV. CONCLUSION

14. In conclusion, I strongly endorse the Settlement as fair, reasonable, and adequate. I appreciate the Court's attention to the facts presented in my declaration and respectfully request that the Court approve: (a) Plaintiffs' motion for final approval of the proposed Settlement and approval of the Plan of Allocation; (b) Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses; and (c) my request for reimbursement of the reasonable costs and expenses incurred in prosecuting the Action on behalf of the Settlement Class.

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

Executed on March 7th, 2024, in Kernersville, North Carolina.



Gary Williams

EXHIBIT 3

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**DECLARATION OF LEAD PLAINTIFF GIUSEPPE VELENO IN SUPPORT OF:
(1) 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 REIMBURSEMENT OF LITIGATION
EXPENSES**

I, Giuseppe Veleno, declare as follows:

1. I am one of the Court-appointed Lead Plaintiffs in the above-captioned securities class action (the “Action”).¹ ECF No. 41. I respectfully submit this declaration in support of: (a) Plaintiffs’ motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation; and (b) Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses, including approval of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein, as I have been directly involved in monitoring and overseeing the prosecution of the Action, as well as the negotiations leading to the Settlement, and I could and would testify competently to these matters.

I. LEAD PLAINTIFF’S OVERSIGHT OF THE LITIGATION

3. I have been actively involved in the prosecution of this case since June 21, 2019, when the Court appointed me to serve as one of the Lead Plaintiffs in this Action. ECF No. 41.

4. In fulfillment of my responsibilities as a Lead Plaintiff, I have worked closely with Lead Counsel regarding the litigation and resolution of this case.

5. Throughout the litigation, I received status reports from Lead Counsel on case developments, and participated in regular discussions concerning the prosecution of the Action, the strengths of and risks to the claims, and potential settlement. In particular, I: (a) regularly

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated July 21, 2023. ECF No. 122-1.

communicated with my attorneys regarding the posture and progress of the case, as well as strategy; (b) compiled and produced trading records to my attorneys; (c) provided relevant documents to my attorneys for production to the Defendants; (d) provided information to my attorneys to respond to Defendants' interrogatories; (e) prepared for and gave a deposition; (f) reviewed pleadings and briefs filed in the Action; (g) reviewed Court Orders; (h) prepared for the mediation by, among other things, discussing with counsel the mediation statements and mediation strategy; (i) made myself available during the mediation and consulted with counsel regarding settlement negotiations; (j) evaluated the Settlement Amount, conferred with counsel, and ultimately approved the Settlement; and (k) communicated with counsel regarding the process of finalizing the Settlement.

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. APPROVAL OF THE SETTLEMENT

7. As detailed in the paragraphs above, through my active participation I was both well-informed of the status and progress of the litigation, and the status and progress of the settlement negotiations in this Action.

8. Based on my involvement in the prosecution and resolution of the claims asserted in the Action, I believe that the proposed Settlement provides a fair, reasonable, and adequate recovery for the Settlement Class, particularly in light of the risks of continued litigation, and I fully endorse approval of the Settlement by the Court.

III. LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

A. Attorneys’ Fees And Litigation Expenses

9. I believe Lead Counsel’s request for an award of attorneys’ fees in the amount of 33⅓% of the Settlement Fund is fair and reasonable in light of the work Plaintiffs’ Counsel performed on behalf of the Settlement Class.

10. I have evaluated Plaintiffs’ Counsel’s fee request by considering the quality and amount of the work performed, the recovery obtained for the Settlement Class, and the risks Plaintiffs’ Counsel bore in prosecuting this Action on behalf of myself, the other Plaintiffs, and the Settlement Class on a fully contingent basis, which included the fronting of all expenses. I have authorized this fee request for the Court’s ultimate determination.

11. I further believe the litigation expenses for which Lead Counsel has requested reimbursement are reasonable, and represent costs and expenses necessary for the prosecution and resolution of the claims in the Action. Based on the foregoing, and consistent with my obligation to the Settlement Class to obtain the best result at the most efficient cost, I fully support Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses.

B. Lead Plaintiff’s Litigation-Related Costs And Expenses

12. I understand that reimbursement of a class representative’s reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel’s request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

13. I am a project manager, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent at my job, investing, or on other activities

and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$10,000 for the time I devoted to participating in this Action. I make this request based on the conservative effort that I devoted approximately 200 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

IV. CONCLUSION

14. In conclusion, I strongly endorse the Settlement as fair, reasonable, and adequate. I appreciate the Court's attention to the facts presented in my declaration and respectfully request that the Court approve: (a) Plaintiffs' motion for final approval of the proposed Settlement and approval of the Plan of Allocation; (b) Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses; and (c) my request for reimbursement of the reasonable costs and expenses incurred in prosecuting the Action on behalf of the Settlement Class.

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

Executed on March 8, 2024, in Montreal, Quebec, Canada.

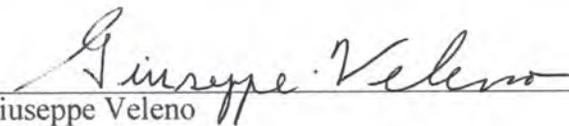

Giuseppe Veleno

EXHIBIT 4

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**DECLARATION OF NAMED PLAINTIFF RON MILLER IN SUPPORT OF: (1)
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 REIMBURSEMENT OF LITIGATION
EXPENSES**

I, Ron Miller, declare as follows:

1. I am a named plaintiff in the above-captioned securities class action (the “Action”).¹ See ECF No. 44. I respectfully submit this declaration in support of: (a) Plaintiffs’ motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation; and (b) Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses, including approval of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein, and I could and would testify competently to these matters.

3. I have been actively involved in the prosecution of this case since November 8, 2018, when I filed the initial complaint in this Action. ECF No. 1.

4. As an additional named plaintiff in this Action, I have worked closely with Lead Counsel regarding the litigation of this case.

5. Throughout my involvement in the litigation, I received status reports from Lead Counsel on case developments, and participated in discussions concerning the prosecution of the Action, the strengths of and risks to the claims, and potential settlement. In particular, during course of my involvement, I: (a) regularly communicated with my attorneys regarding the posture and progress of the case, as well as strategy; (b) compiled and produced trading records to my attorneys; (c) provided relevant documents to my attorneys for production to the Defendants; (d)

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated July 21, 2023. ECF No. 122-1.

provided information to my attorneys to respond to Defendants' interrogatories; (e) prepared for and gave a deposition; (f) reviewed pleadings and briefs filed in the Action; (g) reviewed all Court Orders; (h) prepared for the mediation by, among other things, discussing with counsel the mediation statements and mediation strategy; (i) made myself available during the mediation and consulted with counsel regarding settlement negotiations; (j) evaluated the Settlement Amount, conferred with counsel, and ultimately approved the Settlement; and (k) communicated with counsel regarding the process of finalizing the Settlement.

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

7. As detailed in the paragraphs above, through my active participation I was both well-informed of the status and progress of the litigation, and the status and progress of the settlement negotiations in this Action.

8. Based on my involvement in the prosecution and resolution of the claims asserted in the Action, I believe that the proposed Settlement provides a fair, reasonable, and adequate recovery for the Settlement Class, particularly in light of the risks of continued litigation, and I fully endorse approval of the Settlement by the Court.

9. I understand that reimbursement of a named plaintiff's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

10. I run a carpentry and home building business, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent at my job, investing,

10. I run a carpentry and home building business, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent at my job, investing, or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$10,000 for the time I devoted to participating in this Action. I make this request based on the conservative effort that I devoted approximately 120 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

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

Executed on March 7, 2024, in Hegins, Pennsylvania.


Ron Miller

EXHIBIT 5



ANDREWS DEVALERIO LLP

The attorneys at Andrews DeValerio LLP have decades of experience in business litigation and prosecuting class actions on behalf of institutions and individuals and recovering losses caused by violations of securities, antitrust and consumer laws.

Daryl Andrews is a co-founding partner of Andrews DeValerio LLP. Her practice has focused on securities litigation for the past decade. She has successfully litigated numerous class actions that have resulted in substantial settlements for defrauded investors. Ms. Andrews has also practiced business litigation with an emphasis on entertainment, bankruptcy and real estate litigation, and employment law. After graduating from Smith College and Boston University School of Law, Ms. Andrews clerked for Judge Michael A. Ponsor of the U.S. District Court, District of Massachusetts.

Glen DeValerio is a co-founding partner of Andrews DeValerio LLP. He was a co-founder in 1982 of Berman DeValerio & Pease, LLP, one of the law firms that later formed Berman DeValerio.

Mr. DeValerio has prosecuted federal securities law violations, chiefly class and derivative actions, since the early 1970s. In 1973 and 1974, he served as law clerk to the Honorable June L. Green, U.S. District Court for the District of Columbia. Mr. DeValerio served on the Catholic University Law Review's editorial board for two years. A frequent lecturer on complex securities litigation issues, Mr. DeValerio speaks at continuing legal education seminars sponsored by groups such as PLI, ALI-ABA and the Boston Bar Association. He is vice president of the International Financial Litigation Network, an association of law firms seeking to create a global litigation framework to promote legal security, transparency and market confidence. Mr. DeValerio served as President of the National Association of Securities and Commercial Law Attorneys (NASCAT) from 1996 to 1998.

Mr. DeValerio has received the following accolades:

- The Legal 500 recently ranked Mr. DeValerio as “recommended” in securities litigation in its 2017 U.S. edition.
- Awarded a rating of AV® Preeminent by Martindale-Hubbell®
- Local Litigation Star by Benchmark Litigation in 2013
- Named one of Massachusetts’ “Super Lawyers” in securities litigation for the years 2004-2005, 2008-2022 by Super Lawyers, part of Thomson Reuters

EXHIBIT 6



1925 Century Park East, Suite 2100
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FIRM RESUME

Glancy Prongay & Murray LLP (the “Firm”) has represented investors, consumers and employees for over 25 years. Based in Los Angeles, with offices in New York City and Berkeley, the Firm has successfully prosecuted class action cases and complex litigation in federal and state courts throughout the country. As Lead Counsel, Co-Lead Counsel, or as a member of Plaintiffs’ Counsel Executive Committees, the Firm’s attorneys have recovered billions of dollars for parties wronged by corporate fraud, antitrust violations and malfeasance. Indeed, the Institutional Shareholder Services unit of RiskMetrics Group has recognized the Firm as one of the top plaintiffs’ law firms in the United States in its Securities Class Action Services report for every year since the inception of the report in 2003. The Firm’s efforts have been publicized in major newspapers such as the *Wall Street Journal*, the *New York Times*, and the *Los Angeles Times*.

Glancy Prongay & Murray’s commitment to high quality and excellent personalized services has boosted its national reputation, and we are now recognized as one of the premier plaintiffs’ firms in the country. The Firm works tenaciously on behalf of clients to produce significant results and generate lasting corporate reform.

The Firm’s integrity and success originate from our attorneys, who are among the brightest and most experienced in the field. Our distinguished litigators have an unparalleled track record of investigating and prosecuting corporate wrongdoing. The Firm is respected for both the zealous advocacy with which we represent our clients’ interests as well as the highly-professional and ethical manner by which we achieve results. We are ideally positioned to pursue securities, antitrust, consumer, and derivative litigation on behalf of our clients. The Firm’s outstanding accomplishments are the direct result of the exceptional talents of our attorneys and employees.

SECURITIES CLASS ACTION SETTLEMENTS

Appointed as Lead or Co-Lead Counsel by judges throughout the United States, Glancy Prongay & Murray has achieved significant recoveries for class members in numerous securities class actions, including:

In re Mercury Interactive Corporation Securities Litigation, USDC Northern District of California, Case No. 05-3395-JF, in which the Firm served as Co-Lead Counsel and achieved a settlement valued at over \$117 million.

In re Real Estate Associates Limited Partnership Litigation, USDC Central District of California, Case No. 98-7035-DDP, in which the Firm served as local counsel and plaintiffs achieved a \$184 million jury verdict after a complex six week trial in Los Angeles, California and later settled the case for \$83 million.

In Re Yahoo! Inc. Securities Litigation, USDC Northern District of California, Case No. 5:17-cv-00373-LHK, in which the Firm served as Co-Lead Counsel and achieved an \$80 million settlement.

The City of Farmington Hills Employees Retirement System v. Wells Fargo Bank, N.A., USDC District of Minnesota, Case No. 10-cv-04372-DWF/JJG, in which the Firm served as Co-Lead Counsel and achieved a settlement valued at \$62.5 million.

Shah v. Zimmer Biomet Holdings, Inc., USDC Northern District of Indiana, Case No. 3:16-cv-815-PPS-MGG, a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$50 million.

Schleicher v. Wendt, (Conseco Securities Litigation), USDC Southern District of Indiana, Case No. 02-1332-SEB, a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of over \$41 million.

Robb v. Fitbit, Inc., USDC Northern District of California, Case No. 3:16-cv-00151, a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$33 million.

Yaldo v. Airtouch Communications, State of Michigan, Wayne County, Case No. 99-909694-CP, in which the Firm served as Co-Lead Counsel and achieved a settlement valued at over \$32 million for defrauded consumers.

Lapin v. Goldman Sachs, USDC Southern District of New York, Case No. 03-0850-KJD, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$29 million.

In re Heritage Bond Litigation, USDC Central District of California, Case No. 02-ML-1475-DT, where as Co-Lead Counsel, the Firm recovered in excess of \$28 million for defrauded investors and continues to pursue additional defendants.

In re Livent, Inc. Noteholders Litigation, USDC Southern District of New York, Case No. 99 Civ 9425-VM, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of over \$27 million.

Mild v. PPG Industries, Inc., USDC Central District of California, Case No. 18-cv-04231, a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$25 million.

Davis v. Yelp, Inc., USDC Northern District of California, Case No. 18-cv-0400, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$22.5 million.

In re ECI Telecom Ltd. Securities Litigation, USDC Eastern District of Virginia, Case No. 01-913-A, in which the Firm served as sole Lead Counsel and recovered almost \$22 million for defrauded ECI investors.

In re Sesen Bio, Inc. Securities Litigation, USDC Southern District of New York, Case No. 21-cv-07025, a securities fraud class action, in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$21 million.

Senn v. Sealed Air Corporation, USDC New Jersey, Case No. 03-cv-4372-DMC, a securities fraud class action, in which the Firm acted as Co-Lead Counsel for the Class and achieved a settlement of \$20 million.

In re Gilat Satellite Networks, Ltd. Securities Litigation, USDC Eastern District of New York, Case No. 02-1510-CPS, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$20 million.

In re Lumenis, Ltd. Securities Litigation, USDC Southern District of New York, Case No. 02-CV-1989-DAB, in which the Firm served as Co-Lead Counsel and achieved a settlement valued at over \$20 million.

Wilson v. LSB Industries, Inc., USDC Southern District of New York, Case No. 15-cv-07614, a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$18.45 million.

In re Infonet Services Corporation Securities Litigation, USDC Central District of California, Case No. CV 01-10456-NM, in which as Co-Lead Counsel, the Firm achieved a settlement of \$18 million.

Pierrelouis v. Gogo Inc., USDC Northern District of Illinois, Case No. 18-cv-04473, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$17.3 million.

In re ESC Medical Systems, Ltd. Securities Litigation, USDC Southern District of New York, Case No. 98 Civ. 7530-NRB, a securities fraud class action in which the Firm served as sole Lead Counsel for the Class and achieved a settlement valued in excess of \$17 million.

Macovski v. Groupon, Inc., USDC Northern District of Illinois, Case No. 20-cv-02581, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$13.5 million.

In re Musicmaker.com Securities Litigation, USDC Central District of California, Case No. 00-02018-CAS, a securities fraud class action in which the Firm was sole Lead Counsel for the Class and recovered in excess of \$13 million.

In re Lason, Inc. Securities Litigation, USDC Eastern District of Michigan, Case No. 99 76079-AJT, in which the Firm was Co-Lead Counsel and recovered almost \$13 million for defrauded Lason stockholders.

In re Inso Corp. Securities Litigation, USDC District of Massachusetts, Case No. 99 10193-WGY, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement valued in excess of \$12 million.

In re National TechTeam Securities Litigation, USDC Eastern District of Michigan, Case No. 97-74587-AC, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement valued in excess of \$11 million.

Taft v. Ackermans (KPNQwest Securities Litigation), USDC Southern District of New York, Case No. 02-CV-07951-PKL, a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement worth \$11 million.

Derr v. RA Medical Systems, Inc., USDC Southern District of California, Case No. 19-cv-01079, a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$10 million.

Jenson v. First Trust Corporation, USDC Central District of California, Case No. 05-cv-3124-ABC, in which the Firm was appointed sole lead counsel and achieved an \$8.5 million settlement in a very difficult case involving a trustee's potential liability for losses incurred by investors in a Ponzi scheme. Kevin Ruf of the Firm also successfully defended in the 9th Circuit Court of Appeals the trial court's granting of class certification in this case.

ANTITRUST PRACTICE GROUP AND ACHIEVEMENTS

Glancy Prongay & Murray's Antitrust Practice Group focuses on representing individuals and entities that have been victimized by unlawful monopolization, price-fixing, market allocation, and other anti-competitive conduct. The Firm has prosecuted significant antitrust cases and has helped individuals and businesses recover billions of dollars. Prosecuting civil antitrust cases under federal and state laws throughout the country, the Firm's Antitrust Practice Group represents consumers, businesses, and Health and Welfare Funds and seeks injunctive relief and damages for violations of antitrust and commodities laws. The Firm has served, or is currently serving, as Lead Counsel, Co-Lead Counsel or Class Counsel in a substantial number of antitrust class actions, including:

In re Nasdaq Market-Makers Antitrust Litigation, USDC Southern District of New York, Case No. 94 C 3996-RWS, MDL Docket No. 1023, a landmark antitrust lawsuit in which the Firm filed the first complaint against all of the major NASDAQ market makers and served on Plaintiffs' Counsel's Executive Committee in a case that recovered \$900 million for investors.

Sullivan v. DB Investments, USDC District of New Jersey, Case No. No. 04-cv-2819, where the Firm served as Co-Lead Settlement Counsel in an antitrust case against DeBeers relate to the pricing of diamonds that settled for \$295 million.

In re Korean Air Lines Antitrust Litig., USDC Central District of California, Master File No. CV 07-05107 SJO(AGRx), MDL No. 07-0189, where the Firm served as Co-Lead Counsel in a case related to fixing of prices for airline tickets to Korea that settled for \$86 million.

In re Urethane Chemical Antitrust Litig., USDC District of Kansas, Case No. MDL 1616, where the Firm served as Co-Lead counsel in an antitrust price fixing case that settled \$33 million.

In re Western States Wholesale Natural Gas Litig., USDC District of Nevada, Case No. MDL 1566, where the Firm served as Class Counsel in an antitrust price fixing case that settled \$25 million.

In re Aggrenox Antitrust Litig., USDC District of Connecticut, Case No. 14-cv-2516, where the Firm played a major role in achieving a settlement of \$54,000,000.

In re Solodyn Antitrust Litig., USDC District of Massachusetts, Case No. MDL 2503, where the Firm played a major role in achieving a settlement of \$43,000,000.

In re Generic Pharmaceuticals Pricing Antitrust Litig., USDC Eastern District of Pennsylvania, Case No. 16-md-2427, where the Firm is representing a major Health and Welfare Fund in a case against a number of generic drug manufacturers for price fixing generic drugs.

In re Actos End Payor Antitrust Litig., USDC Southern District of New York, Case No. 13-cv-9244, where the Firm is serving on Plaintiffs' Executive Committee.

In re Heating Control Panel Direct Purchaser Action, USDC Eastern District of Michigan, Case No. 12-md-02311, representing a recreational vehicle manufacturer in a price-fixing class action involving direct purchasers of heating control panels.

In re Instrument Panel Clusters Direct Purchaser Action, USDC Eastern District of Michigan, Case No. 12-md-02311, representing a recreational vehicle manufacturer in a price-fixing class action involving direct purchasers of instrument panel clusters.

In addition, the Firm is currently involved in the prosecution of many market manipulation cases relating to violations of antitrust and commodities laws, including *Sullivan v. Barclays PLC* (manipulation of Euribor rate), *In re Foreign Exchange Benchmark Rates Antitrust Litig.*, *In re LIBOR-Based Financial Instruments Antitrust Litig.*, *In re Gold Futures & Options Trading Litig.*, *In re Platinum & Palladium Antitrust Litig.*, *Sonterra Cap. Master Fund v. Credit Suisse Group AG* (Swiss Libor rate manipulation), *Twin City Iron Pension Fund v. Bank of Nova Scotia* (manipulation of treasury securities), and *Ploss v. Kraft Foods Group* (manipulation of wheat prices).

Glancy Prongay & Murray has been responsible for obtaining favorable appellate opinions which have broken new ground in the class action or securities fields, or which have promoted shareholder rights in prosecuting these actions. The Firm successfully argued the appeals in a number of cases:

In *Smith v. L'Oreal*, 39 Cal.4th 77 (2006), Firm partner Kevin Ruf established ground-breaking law when the California Supreme Court agreed with the Firm's position that waiting penalties under the California Labor Code are available to *any* employee after termination of employment, regardless of the reason for that termination.

OTHER NOTABLE ACHIEVEMENTS

Spearheaded by Firm attorney Kevin Ruf, the Firm served as Co-Lead Counsel for a class of drivers misclassified as independent contractors in the landmark case *Lee v. Dynamex*, Case No. BC332016 (Super. Ct. of Cal), which made new law for workers' rights in the California Supreme Court. The *Dynamex* decision altered 30 years of California law and established a new definition of employment that brings more workers within the protections of California's Labor Code. The California legislature, in response to the *Dynamex* decision, promulgated AB5, a statute that codifies the law of the *Dynamex* case and expands its reach.

Headed by Firm attorney Kara Wolke, the Firm served as additional plaintiffs' counsel in *Christine Asia Co. Ltd., et al. v. Jack Yun Ma et al. ("Alibaba")*, 1:15-md-02631 (SDNY), a securities class action on behalf of investors alleging violations of the Securities Exchange Act of 1934 in connection with Alibaba's historic \$25 billion IPO, the then-largest IPO in history. After hard-fought litigation, including a successful appeal to the Second Circuit and obtaining class certification, the case settled for \$250 million.

Other notable Firm cases include: *Silber v. Mabon I*, 957 F.2d 697 (9th Cir. 1992) and *Silber v. Mabon II*, 18 F.3d 1449 (9th Cir. 1994), which are the leading decisions in the Ninth Circuit regarding the rights of opt-outs in class action settlements. In *Rothman v. Gregor*, 220 F.3d 81 (2d Cir. 2000), the Firm won a seminal victory for investors before the Second Circuit Court of Appeals, which adopted a more favorable pleading standard for investors in reversing the District Court's dismissal of the investors' complaint. After this successful appeal, the Firm then recovered millions of dollars for defrauded investors of the GT Interactive Corporation. The Firm also argued *Falkowski v. Imation Corp.*, 309 F.3d 1123 (9th Cir. 2002), *as amended*, 320 F.3d 905 (9th Cir. 2003), and favorably obtained the substantial reversal of a lower court's dismissal of a cutting edge, complex class action initiated to seek redress for a group of employees whose stock options were improperly forfeited by a giant corporation in the course of its sale of the subsidiary at which they worked.

The Firm also has been involved in the representation of individual investors in court proceedings throughout the United States and in arbitrations before the American Arbitration Association, National Association of Securities Dealers, New York Stock Exchange, and Pacific Stock Exchange. Mr. Glancy has successfully represented litigants in proceedings against such major securities firms and insurance companies as

A.G. Edwards & Sons, Bear Stearns, Merrill Lynch & Co., Morgan Stanley, PaineWebber, Prudential, and Shearson Lehman Brothers.

One of the Firm's unique skills is the use of "group litigation" - the representation of groups of individuals who have been collectively victimized or defrauded by large institutions. This type of litigation brought on behalf of individuals who have been similarly damaged often provides an efficient and effective economic remedy that frequently has advantages over the class action or individual action devices. The Firm has successfully achieved results for groups of individuals in cases against major corporations such as Metropolitan Life Insurance Company, and Occidental Petroleum Corporation.

Glancy Prongay & Murray LLP currently consists of the following attorneys:

PARTNERS

LEE ALBERT, a partner, was admitted to the bars of the Commonwealth of Pennsylvania, the State of New Jersey, and the United States District Courts for the Eastern District of Pennsylvania and the District of New Jersey in 1986. He received his B.S. and M.S. degrees from Temple University and Arcadia University in 1975 and 1980, respectively, and received his J.D. degree from Widener University School of Law in 1986. Upon graduation from law school, Mr. Albert spent several years working as a civil litigator in Philadelphia, PA. Mr. Albert has extensive litigation and appellate practice experience having argued before the Supreme and Superior Courts of Pennsylvania and has over fifteen years of trial experience in both jury and non-jury cases and arbitrations. Mr. Albert has represented a national health care provider at trial obtaining injunctive relief in federal court to enforce a five-year contract not to compete on behalf of a national health care provider and injunctive relief on behalf of an undergraduate university.

Currently, Mr. Albert represents clients in all types of complex litigation including matters concerning violations of federal and state antitrust and securities laws, mass tort/product liability and unfair and deceptive trade practices. Some of Mr. Albert's current major cases include *In Re Automotive Wire Harness Systems Antitrust Litigation* (E.D. Mich.); *In Re Heater Control Panels Antitrust Litigation* (E.D. Mich.); *Kleen Products, et al. v. Packaging Corp. of America* (N.D. Ill.); and *In re Class 8 Transmission Indirect Purchaser Antitrust Litigation* (D. Del.). Previously, Mr. Albert had a significant role in *Marine Products Antitrust Litigation* (C.D. Cal.); *Baby Products Antitrust Litigation* (E.D. Pa.); *In re ATM Fee Litigation* (N.D. Cal.); *In re Canadian Car Antitrust Litigation* (D. Me.); *In re Broadcom Securities Litigation* (C.D. Cal.); and has worked on *In re Avandia Marketing, Sales Practices and Products Liability Litigation* (E.D. Pa.); *In re Ortho Evra Birth Control Patch Litigation* (N.J. Super. Ct.); *In re AOL Time Warner, Inc. Securities Litigation* (S.D.N.Y.); *In re WorldCom, Inc. Securities Litigation* (S.D.N.Y.); and *In re Microsoft Corporation Massachusetts Consumer Protection Litigation* (Mass. Super. Ct.).

BRIAN D. BROOKS joined the New York office of Glancy Prongay & Murray LLP in 2019, specializing in antitrust, consumer, and securities litigation. His current cases include *In re Zetia Antitrust Litigation*, No. 18-md-2836 (E.D. Va.); *Staley, et al. v. Gilead Sciences*,

Inc., et al., No. 3:19-cv-02573-EMC (N.D. Cal.); and *In re: Seroquel XR (Extended Release Quetiapine Fumarate) Litigation*, No. 1:19-cv-08296-CM (S.D.N.Y.).

Prior to joining the firm, Mr. Brooks was an associate at Murray, Frank & Sailer, LLP in New York, where his practice was focused on antitrust, consumer, and securities matters, and later a partner at Smith, Segura & Raphael, LLP, in New York and Louisiana. During his tenure at Smith Segura & Raphael, LLP, Mr. Brooks represented direct purchasers in numerous antitrust matters, including *In re: Suboxone (Buprenorphine Hydrochloride and Naloxone) Antitrust Litigation*, No. 2:13-md-02445 (E.D. Pa.), *In re: Niaspan Antitrust Litigation*, No. 2:13-md-02460 (E.D. Pa.), and *In re: Novartis & Par Antitrust Litigation (Exforge)*, No. 18-cv-4361 (S.D.N.Y.), and was an active member of the trial team for the class in *In re: Nexium (Esomeprazole) Antitrust Litigation*, No. 12-md-2409 (D. Mass.), the first post-Actavis reverse-payment case to be tried to verdict. He was also an active member of the litigation teams in the *King Drug Company of Florence, Inc. et al. v. Cephalon, Inc., et al. (Provigil)*, No. 2:06-cv-1797 (E.D. Pa.); *In re: Prograf Antitrust Litigation*, No. 1:11-md-2242 (D. Mass.) and *In re: Miralax* antitrust matters, which collectively settled for more than \$600 million, and a member of the litigation teams in *In re: Relafen Antitrust Litigation*, No. 01-cv-12239 (D. Mass.); *In re: Buspirone Antitrust Litigation*, MDL Dkt. No. 1410 (S.D.N.Y.); *In re: Remeron Antitrust Litigation*, No. 02-2007 (D.N.J.); *In re: Terazosin Hydrochloride Antitrust Litigation*, No. 99-MDL-1317 (S.D. Fla.); and *In re K-Dur Antitrust Litigation*, No. 10-cv-1652 (D.N.J.).

Mr. Brooks received his B.A. from Northwestern State University of Louisiana in 1998 and his J.D. from Washington and Lee School of Law in 2002, where he was a staff writer for the Environmental Law Digest and clerked for the Alderson Legal Assistance Program, handling legal matters for inmates of the Federal Detention Center in Alderson, West Virginia. He is admitted to practice in all state courts in New York and Louisiana, as well as the United States District Courts for the Southern and Eastern Districts of New York and the Eastern and Western Districts of Louisiana.

JOSEPH D. COHEN has extensive complex civil litigation experience, and currently oversees the firm's settlement department, negotiating, documenting and obtaining court approval of the firm's securities, merger and derivative settlements.

Prior to joining the firm, Mr. Cohen successfully prosecuted numerous securities fraud, consumer fraud, antitrust and constitutional law cases in federal and state courts throughout the country. Cases in which Mr. Cohen took a lead role include: *Jordan v. California Dep't of Motor Vehicles*, 100 Cal. App. 4th 431 (2002) (complex action in which the California Court of Appeal held that California's Non-Resident Vehicle \$300 Smog Impact Fee violated the Commerce Clause of the United States Constitution, paving the way for the creation of a \$665 million fund and full refunds, with interest, to 1.7 million motorists); *In re Geodyne Res., Inc. Sec. Litig.* (Harris Cty. Tex.) (settlement of securities fraud class action, including related litigation, totaling over \$200 million); *In re Cmty. Psychiatric Centers Sec. Litig.* (C.D. Cal.) (settlement of \$55.5 million was obtained from the company and its auditors, Ernst & Young, LLP); *In re McLeodUSA Inc., Sec. Litig.* (N.D. Iowa) (\$30 million settlement); *In re Arakis Energy Corp. Sec. Litig.* (E.D.N.Y.) (\$24 million settlement); *In re Metris Cos., Inc., Sec. Litig.* (D. Minn.) (\$7.5 million settlement);

In re Landry's Seafood Rest., Inc. Sec. Litig. (S.D. Tex.) (\$6 million settlement); and *Freedman v. Maspeth Fed. Loan and Savings Ass'n*, (E.D.N.Y) (favorable resolution of issue of first impression under RESPA resulting in full recovery of improperly assessed late fees).

Mr. Cohen was also a member of the teams that obtained substantial recoveries in the following cases: *In re: Foreign Exchange Benchmark Rates Antitrust Litig.* (S.D.N.Y.) (partial settlements of approximately \$2 billion); *In re Washington Mutual Mortgage-Backed Sec. Litig.* (W.D. Wash.) (settlement of \$26 million); *Mylan Pharm., Inc. v. Warner Chilcott Public Ltd. Co.* (E.D. Pa.) (\$8 million recovery in antitrust action on behalf of class of indirect purchasers of the prescription drug Doryx); *City of Omaha Police and Fire Ret. Sys. v. LHC Group, Inc.* (W.D. La.) (securities class action settlement of \$7.85 million); and *In re Pacific Biosciences of Cal., Inc. Sec. Litig.* (Cal. Super. Ct.) (\$7.6 million recovery).

In addition, Mr. Cohen was previously the head of the settlement department at Bernstein Litowitz Berger & Grossmann LLP. While at BLB&G, Mr. Cohen had primary responsibility for overseeing the team working on the following settlements, among others: *In Re Merck & Co., Inc. Sec., Deriv. & "ERISA" Litig.* (D.N.J.) (\$1.062 billion securities class action settlement); *New York State Teachers' Ret. Sys. v. General Motors Co.* (E.D. Mich.) (\$300 million securities class action settlement); *In re JPMorgan Chase & Co. Sec. Litig.* (S.D.N.Y.) (\$150 million settlement); *Dep't of the Treasury of the State of New Jersey and its Division of Inv. v. Cliffs Natural Res. Inc., et al.* (N.D. Ohio) (\$84 million securities class action settlement); *In re Penn West Petroleum Ltd. Sec. Litig.* (S.D.N.Y.) (\$19.76 million settlement); and *In re BioScrip, Inc. Sec. Litig.* (\$10.9 million settlement).

LIONEL Z. GLANCY, a graduate of University of Michigan Law School, is the founding partner of the Firm. After serving as a law clerk for United States District Judge Howard McKibben, he began his career as an associate at a New York law firm concentrating in securities litigation. Thereafter, he started a boutique law firm specializing in securities litigation, and other complex litigation, from the Plaintiff's perspective. Mr. Glancy has established a distinguished career in the field of securities litigation over the last thirty years, having appeared and been appointed lead counsel on behalf of aggrieved investors in securities class action cases throughout the country. He has appeared and argued before dozens of district courts and a number of appellate courts. His efforts have resulted in the recovery of hundreds of millions of dollars in settlement proceeds for huge classes of shareholders. Well known in securities law, he has lectured on its developments and practice, including having lectured before Continuing Legal Education seminars and law schools.

Mr. Glancy was born in Windsor, Canada, on April 4, 1962. Mr. Glancy earned his undergraduate degree in political science in 1984 and his Juris Doctor degree in 1986, both from the University of Michigan. He was admitted to practice in California in 1988, and in Nevada and before the U.S. Court of Appeals, Ninth Circuit, in 1989.

MARC L. GODINO has extensive experience successfully litigating complex, class action lawsuits as a plaintiffs' lawyer. Since joining the firm in 2005, Mr. Godino has played a primary role in cases resulting in settlements of more than \$100 million. He has prosecuted securities, derivative, merger & acquisition, and consumer cases throughout the country in both state and federal court, as well as represented defrauded investors at FINRA arbitrations. Mr. Godino manages the Firm's consumer class action department.

While a senior associate with Stull Stull & Brody, Mr. Godino was one of the two primary attorneys involved in *Small v. Fritz Co.*, 30 Cal. 4th 167 (April 7, 2003), in which the California Supreme Court created new law in the State of California for shareholders that held shares in detrimental reliance on false statements made by corporate officers. The decision was widely covered by national media including *The National Law Journal*, the *Los Angeles Times*, the *New York Times*, and the *New York Law Journal*, among others, and was heralded as a significant victory for shareholders.

Mr. Godino's successes with Glancy Prongay & Murray LLP include: *Good Morning To You Productions Corp., et al., v. Warner/Chappell Music, Inc., et al.*, Case No. 13-04460 (C.D. Cal.) (In this highly publicized case that attracted world-wide attention, Plaintiffs prevailed on their claim that the song "Happy Birthday" should be in the public domain and achieved a \$14,000,000 settlement to class members who paid a licensing fee for the song); *Ord v. First National Bank of Pennsylvania*, Case No. 12-766 (W. D. Pa.) (\$3,000,000 settlement plus injunctive relief); *Pappas v. Naked Juice Co. of Glendora, Inc.*, Case No. 11-08276 (C.D. Cal.) (\$9,000,000 settlement plus injunctive relief); *Astiana v. Kashi Company*, Case No. 11-1967 (S.D. Cal.) (\$5,000,000 settlement); *In re Magma Design Automation, Inc. Securities Litigation*, Case No. 05-2394 (N.D. Cal.) (\$13,500,000 settlement); *In re Hovnanian Enterprises, Inc. Securities Litigation*, Case No. 08-cv-0099 (D.N.J.) (\$4,000,000 settlement); *In re Skilled Healthcare Group, Inc. Securities Litigation*, Case No. 09-5416 (C.D. Cal.) (\$3,000,000 settlement); *Kelly v. Phiten USA, Inc.*, Case No. 11-67 (S.D. Iowa) (\$3,200,000 settlement plus injunctive relief); (*Shin et al., v. BMW of North America*, 2009 WL 2163509 (C.D. Cal. July 16, 2009) (after defeating a motion to dismiss, the case settled on very favorable terms for class members including free replacement of cracked wheels); *Payday Advance Plus, Inc. v. MIVA, Inc.*, Case No. 06-1923 (S.D.N.Y.) (\$3,936,812 settlement); *Esslinger, et al. v. HSBC Bank Nevada, N.A.*, Case No. 10-03213 (E.D. Pa.) (\$23,500,000 settlement); *In re Discover Payment Protection Plan Marketing and Sales Practices Litigation*, Case No. 10-06994 (\$10,500,000 settlement); *In Re: Bank of America Credit Protection Marketing and Sales Practices Litigation*, Case No. 11-md-02269 (N.D. Cal.) (\$20,000,000 settlement).

Mr. Godino was also the principal attorney in the following published decisions: *In re Zappos.com, Inc., Customer Data Sec. Breach Litigation*, 714 Fed Appx. 761 (9th Cir. 2018) (reversing order dismissing class action complaint); *Small et al., v. University Medical Center of Southern Nevada, et al.*, 2017 WL 3461364 (D. Nev. Aug. 10, 2017) (denying motion to dismiss); *Sciortino v. Pepsico, Inc.*, 108 F.Supp. 3d 780 (N.D. Cal.. June 5, 2015) (motion to dismiss denied); *Peterson v. CJ America, Inc.*, 2015 WL 11582832 (S.D. Cal. May 15, 2015) (motion to dismiss denied); *Lilly v. Jamba Juice Company*, 2014 WL 4652283 (N. D. Cal. Sep 18, 2014) (class certification granted in part); *Kramer v. Toyota Motor Corp.*, 705 F. 3d 1122 (9th Cir. 2013) (affirming denial of

Defendant's motion to compel arbitration); *Sateriale, et al. v. R.J. Reynolds Tobacco Co.*, 697 F. 3d 777 (9th Cir. 2012) (reversing order dismissing class action complaint); *Shin v. BMW of North America*, 2009 WL 2163509 (C.D. Cal. July 16, 2009) (motion to dismiss denied); *In re 2TheMart.com Securities Litigation*, 114 F. Supp. 2d 955 (C.D. Cal. 2002) (motion to dismiss denied); *In re Irvine Sensors Securities Litigation*, 2003 U.S. Dist. LEXIS 18397 (C.D. Cal. 2003) (motion to dismiss denied).

The following represent just a few of the cases Mr. Godino is currently litigating in a leadership position: *Small v. University Medical Center of Southern Nevada*, Case No. 13-00298 (D. Nev.); *Courtright, et al., v. O'Reilly Automotive Stores, Inc., et al.*, Case No. 14-334 (W.D. Mo); *Keskinen v. Edgewell Personal Care Co., et al.*, Case No. 17-07721 (C.D. CA); *Ryan v. Rodan & Fields, LLC*, Case No. 18-02505 (N.D. Cal)

MATTHEW M. HOUSTON, a partner in the firm's New York office, graduated from Boston University School of Law in 1988. Mr. Houston is an active member of the Bar of the State of New York and an inactive member of the bar for the Commonwealth of Massachusetts. Mr. Houston is also admitted to the United States District Courts for the Southern and Eastern Districts of New York and the District of Massachusetts, and the Second, Seventh, Ninth, and Eleventh Circuit Court of Appeals of the United States. Mr. Houston repeatedly has been selected as a New York Metro Super Lawyer.

Mr. Houston has substantial courtroom experience involving complex actions in federal and state courts throughout the country. Mr. Houston was co-lead trial counsel in one the few ERISA class action cases taken to trial asserting breach of fiduciary duty claims against plan fiduciaries, *Brieger et al. v. Tellabs, Inc.*, No. 06-CV-01882 (N.D. Ill.), and has successfully prosecuted many ERISA actions, including *In re Royal Ahold N.V. Securities and ERISA Litigation*, Civil Action No. 1:03-md-01539. Mr. Houston has been one of the principal attorneys litigating claims in multi-district litigation concerning employment classification of pickup and delivery drivers and primarily responsible for prosecuting ERISA class claims resulting in a \$242,000,000 settlement; *In re FedEx Ground Package Inc. Employment Practices Litigation*, No. 3:05-MD-527 (MDL 1700). Mr. Houston recently presented argument before the Eleventh Circuit Court of Appeals on behalf of a class of Florida pickup and delivery drivers obtaining a reversal of the lower court's grant of summary judgment. Mr. Houston represented the interests of Nevada and Arkansas drivers employed by FedEx Ground obtaining significant recoveries on their behalf. Mr. Houston also served as lead counsel in multi-district class litigation seeking to modify insurance claims handling practices; *In re UnumProvident Corp. ERISA Benefits Denial Actions*, No. 1:03-cv-1000 (MDL 1552).

Mr. Houston has played a principal role in numerous derivative and class actions wherein substantial benefits were conferred upon plaintiffs: *In re: Groupon Derivative Litigation*, No. 12-cv-5300 (N.D. Ill. 2012) (settlement of consolidated derivative action resulting in sweeping corporate governance reform estimated at \$159 million) *Bangari v. Lesnik, et al.*, No. 11 CH 41973 (Illinois Circuit Court, County of Cook) (settlement of claim resulting in payment of \$20 million to Career Education Corporation and implementation of extensive corporate governance reform); *In re Diamond Foods, Inc. Shareholder Litigation*, No. CGC-11-515895 (California Superior Court, County of San Francisco)

(\$10.4 million in monetary relief including a \$5.4 million clawback of executive compensation and significant corporate governance reform); *Pace American Shareholder Litigation*, 94-92 TUC-RMB (securities fraud class action settlement resulting in a recovery of \$3.75 million); *In re Bay Financial Securities Litigation*, Master File No. 89-2377-DPW, (D. Mass.) (J. Woodlock) (settlement of action based upon federal securities law claims resulting in class recovery in excess of \$3.9 million); *Goldsmith v. Technology Solutions Company*, 92 C 4374 (N.D. Ill. 1992) (J. Manning) (recovery of \$4.6 million as a result of action alleging false and misleading statements regarding revenue recognition).

In addition to numerous employment and derivative cases, Mr. Houston has litigated actions asserting breach of fiduciary duty in the context of mergers and acquisitions. Mr. Houston has been responsible for securing millions of dollars in additional compensation and structural benefits for shareholders of target companies: *In re Instinet Group, Inc. Shareholders Litigation*, C.A. No. 1289 (Delaware Court of Chancery); *Jasinover v. The Rouse Company*, Case No. 13-C-04-59594 (Maryland Circuit Court); *McLaughlin v. Household International, Inc.*, Case No. 02 CH 20683 (Illinois Circuit Court); *Sebesta v. The Quizno's Corporation*, Case No. 2001 CV 6281 (Colorado District Court); *Crandon Capital Partners v. Sanford M. Kimmel*, C.A. No. 14998 (Del. Ch.); and *Crandon Capital Partners v. Kimmel*, C.A. No. 14998 (Del. Ch. 1996) (J. Chandler) (settlement of an action on behalf of shareholders of Transnational Reinsurance Co. whereby acquiring company provided an additional \$10.4 million in merger consideration).

JASON L. KRAJCKER is a partner in the firm's Los Angeles office. He specializes in complex securities cases and has extensive experience in all phases of litigation (fact investigation, pre-trial motion practice, discovery, trial, appeal).

Prior to joining Glancy Prongay & Murray LLP, Mr. Krajcer was an Associate at Goodwin Procter LLP where he represented issuers, officers and directors in multi-hundred million and billion dollar securities cases. He began his legal career at Orrick, Herrington & Sutcliffe LLP, where he represented issuers, officers and directors in securities class actions, shareholder derivative actions, and matters before the U.S. Securities & Exchange Commission.

Mr. Krajcer is admitted to the State Bar of California, the Bar of the District of Columbia, the United States Supreme Court, the Ninth Circuit Court of Appeals, and the United States District Courts for the Central and Southern Districts of California.

SUSAN G. KUPFER is the founding partner of the Firm's Berkeley office. Ms Kupfer joined the Firm in 2003. She is a native of New York City, and received her A.B. degree from Mount Holyoke College in 1969 and her Juris Doctor degree from Boston University School of Law in 1973. She did graduate work at Harvard Law School and, in 1977, was named Assistant Dean and Director of Clinical Programs at Harvard, supervising and teaching in that program of legal practice and related academic components.

For much of her legal career, Ms. Kupfer has been a professor of law. Her areas of academic expertise are Civil Procedure, Federal Courts, Conflict of Laws, Constitutional

Law, Legal Ethics, and Jurisprudence. She has taught at Harvard Law School, Hastings College of the Law, Boston University School of Law, Golden Gate University School of Law, and Northeastern University School of Law. From 1991 through 2002, she was a lecturer on law at the University of California, Berkeley, Boalt Hall, teaching Civil Procedure and Conflict of Laws. Her publications include articles on federal civil rights litigation, legal ethics, and jurisprudence. She has also taught various aspects of practical legal and ethical training, including trial advocacy, negotiation and legal ethics, to both law students and practicing attorneys.

Ms. Kupfer previously served as corporate counsel to The Architects Collaborative in Cambridge and San Francisco, and was the Executive Director of the Massachusetts Commission on Judicial Conduct. She returned to the practice of law in San Francisco with Morgenstein & Jubelirer and Berman DeValerio LLP before joining the Firm.

Ms. Kupfer's practice is concentrated in complex antitrust litigation. She currently serves, or has served, as Co-Lead Counsel in several multidistrict antitrust cases: *In re Photochromic Lens Antitrust Litig.* (MDL 2173, M.D. Fla. 2010); *In re Fresh and Process Potatoes Antitrust Litig.* (D. ID. 2011); *In re Korean Air Lines Antitrust Litig.* (MDL No. 1891, C.D. Cal. 2007); *In re Urethane Antitrust Litigation* (MDL 1616, D. Kan. 2004); *In re Western States Wholesale Natural Gas Litigation* (MDL 1566, D. Nev. 2005); and *Sullivan et al v. DB Investments et al* (D. N.J. 2004). She has been a member of the lead counsel teams that achieved significant settlements in: *In re Sorbates Antitrust Litigation* (\$96.5 million settlement); *In re Pillar Point Partners Antitrust Litigation* (\$50 million settlement); and *In re Critical Path Securities Litigation* (\$17.5 million settlement).

Ms. Kupfer is a member of the bar of Massachusetts and California, and is admitted to practice before the United States District Courts for the Northern, Central, Eastern and Southern Districts of California, the District of Massachusetts, the Courts of Appeals for the First and Ninth Circuits, and the U.S. Supreme Court.

CHARLES H. LINEHAN is a partner in the firm's Los Angeles office. He graduated summa cum laude from the University of California, Los Angeles with a Bachelor of Arts degree in Philosophy and a minor in Mathematics. Mr. Linehan received his Juris Doctor degree from the UCLA School of Law, where he was a member of the UCLA Moot Court Honors Board. While attending law school, Mr. Linehan participated in the school's First Amendment Amicus Brief Clinic (now the Scott & Cyan Banister First Amendment Clinic) where he worked with nationally recognized scholars and civil rights organizations to draft amicus briefs on various Free Speech issues.

GREGORY B. LINKH works out of the New York office, where he litigates antitrust, securities, shareholder derivative, and consumer cases. Greg graduated from the State University of New York at Binghamton in 1996 and from the University of Michigan Law School in 1999. While in law school, Greg externed with United States District Judge Gerald E. Rosen of the Eastern District of Michigan. Greg was previously associated with the law firms Dewey Ballantine LLP, Pomerantz Haudek Block Grossman & Gross LLP, and Murray Frank LLP.

Previously, Greg had significant roles in *In re Merrill Lynch & Co., Inc. Research Reports Securities Litigation* (settled for \$125 million); *In re Crompton Corp. Securities Litigation* (settled \$11 million); *Lowry v. Andrx Corp.* (settled for \$8 million); *In re Xybernaut Corp. Securities MDL Litigation* (settled for \$6.3 million); and *In re EIS Int'l Inc. Securities Litigation* (settled for \$3.8 million). Greg also represented the West Virginia Investment Management Board (“WVIMB”) in *WVIMB v. Residential Accredited Loans, Inc., et al.*, relating to the WVIMB's investment in residential mortgage-backed securities.

Currently, Greg is litigating various antitrust and securities cases, including *In re Korean Ramen Antitrust Litigation*, *In re Automotive Parts Antitrust Litigation*, and *In re Horsehead Holding Corp. Securities Litigation*.

Greg is the co-author of *Inherent Risk In Securities Cases In The Second Circuit*, NEW YORK LAW JOURNAL (Aug. 26, 2004); and *Staying Derivative Action Pursuant to PSLRA and SLUSA*, NEW YORK LAW JOURNAL, P. 4, COL. 4 (Oct. 21, 2005).

BRIAN MURRAY is the managing partner of the Firm's New York Park Avenue office and the head of the Firm's Antitrust Practice Group. He received Bachelor of Arts and Master of Arts degrees from the University of Notre Dame in 1983 and 1986, respectively. He received a Juris Doctor degree, *cum laude*, from St. John's University School of Law in 1990. At St. John's, he was the Articles Editor of the ST. JOHN'S LAW REVIEW. Mr. Murray co-wrote: *Jurisdição Estrangeira Tem Papel Relevante Na De Fiesa De Investidores Brasileiros*, ESPAÇA JURÍDICO BOVESPA (August 2008); *The Proportionate Trading Model: Real Science or Junk Science?*, 52 CLEVELAND ST. L. REV. 391 (2004-05); *The Accident of Efficiency: Foreign Exchanges, American Depository Receipts, and Space Arbitrage*, 51 BUFFALO L. REV. 383 (2003); *You Shouldn't Be Required To Plead More Than You Have To Prove*, 53 BAYLOR L. REV. 783 (2001); *He Lies, You Die: Criminal Trials, Truth, Perjury, and Fairness*, 27 NEW ENGLAND J. ON CIVIL AND CRIMINAL CONFINEMENT 1 (2001); *Subject Matter Jurisdiction Under the Federal Securities Laws: The State of Affairs After Itoba*, 20 MARYLAND J. OF INT'L L. AND TRADE 235 (1996); *Determining Excessive Trading in Option Accounts: A Synthetic Valuation Approach*, 23 U. DAYTON L. REV. 316 (1997); *Loss Causation Pleading Standard*, NEW YORK LAW JOURNAL (Feb. 25, 2005); *The PSLRA 'Automatic Stay' of Discovery*, NEW YORK LAW JOURNAL (March 3, 2003); and *Inherent Risk In Securities Cases In The Second Circuit*, NEW YORK LAW JOURNAL (Aug. 26, 2004). He also authored *Protecting The Rights of International Clients in U.S. Securities Class Action Litigation*, INTERNATIONAL LITIGATION NEWS (Sept. 2007); *Lifting the PSLRA "Automatic Stay" of Discovery*, 80 N. DAK. L. REV. 405 (2004); *Aftermarket Purchaser Standing Under § 11 of the Securities Act of 1933*, 73 ST. JOHN'S L. REV. 633 (1999); *Recent Rulings Allow Section 11 Suits By Aftermarket Securities Purchasers*, NEW YORK LAW JOURNAL (Sept. 24, 1998); and *Comment, Weissmann v. Freeman: The Second Circuit Errs in its Analysis of Derivative Copy-rights by Joint Authors*, 63 ST. JOHN'S L. REV. 771 (1989).

Mr. Murray was on the trial team that prosecuted a securities fraud case under Section 10(b) of the Securities Exchange Act of 1934 against Microdyne Corporation in the Eastern District of Virginia and he was also on the trial team that presented a claim under

Section 14 of the Securities Exchange Act of 1934 against Artek Systems Corporation and Dynatach Group which settled midway through the trial.

Mr. Murray's major cases include *In re Horsehead Holding Corp. Sec. Litig.*, No. 16-cv-292, 2018 WL 4838234 (D. Del. Oct. 4, 2018) (recommending denial of motion to dismiss securities fraud claims where company's generic cautionary statements failed to adequately warn of known problems); *In re Deutsche Bank Sec. Litig.*, --- F.R.D. ---, 2018 WL 4771525 (S.D.N.Y. Oct. 2, 2018) (granting class certification for Securities Act claims and rejecting defendants' argument that class representatives' trading profits made them atypical class members); *Robb v. Fitbit Inc.*, 216 F. Supp. 3d 1017 (N.D. Cal. 2016) (denying motion to dismiss securities fraud claims where confidential witness statements sufficiently established scienter); *In re Eagle Bldg. Tech. Sec. Litig.*, 221 F.R.D. 582 (S.D. Fla. 2004), 319 F. Supp. 2d 1318 (S.D. Fla. 2004) (complaint against auditor sustained due to magnitude and nature of fraud; no allegations of a "tip-off" were necessary); *In re Turkcell Iletisim A.S. Sec. Litig.*, 209 F.R.D. 353 (S.D.N.Y. 2002) (defining standards by which investment advisors have standing to sue); *In re Turkcell Iletisim A.S. Sec. Litig.*, 202 F. Supp. 2d 8 (S.D.N.Y. 2001) (liability found for false statements in prospectus concerning churn rates); *Feiner v. SS&C Tech., Inc.*, 11 F. Supp. 2d 204 (D. Conn. 1998) (qualified independent underwriters held liable for pricing of offering); *Malone v. Microdyne Corp.*, 26 F.3d 471 (4th Cir. 1994) (reversal of directed verdict for defendants); and *Adair v. Bristol Tech. Systems, Inc.*, 179 F.R.D. 126 (S.D.N.Y. 1998) (aftermarket purchasers have standing under section 11 of the Securities Act of 1933). Mr. Murray also prevailed on an issue of first impression in the Superior Court of Massachusetts, in *Cambridge Biotech Corp. v. Deloitte and Touche LLP*, in which the court applied the doctrine of continuous representation for statute of limitations purposes to accountants for the first time in Massachusetts. 6 Mass. L. Rptr. 367 (Mass. Super. Jan. 28, 1997). In addition, in *Adair v. Microfield Graphics, Inc.* (D. Or.), Mr. Murray settled the case for 47% of estimated damages. *In the Qiao Xing Universal Telephone* case, claimants received 120% of their recognized losses.

Among his current cases, Mr. Murray represents a class of investors in a securities litigation involving preferred shares of Deutsche Bank and is lead counsel in a securities class action against Horsehead Holdings, Inc. in the District of Delaware.

Mr. Murray served as a Trustee of the Incorporated Village of Garden City (2000-2002); Commissioner of Police for Garden City (2000-2001); Co-Chairman, Derivative Suits Subcommittee, American Bar Association Class Action and Derivative Suits Committee, (2007-2010); Member, Sports Law Committee, Association of the Bar for the City of New York, 1994-1997; Member, Litigation Committee, Association of the Bar for the City of New York, 2003-2007; Member, New York State Bar Association Committee on Federal Constitution and Legislation, 2005-2008; Member, Federal Bar Council, Second Circuit Committee, 2007-present.

Mr. Murray has been a panelist at CLEs sponsored by the Federal Bar Council and the Institute for Law and Economic Policy, at the German-American Lawyers Association Annual Meeting in Frankfurt, Germany, and is a frequent lecturer before institutional investors in Europe and South America on the topic of class actions.

NATALIE S. PANG is a partner in the firm's Los Angeles office. Ms. Pang has advocated on behalf of thousands of consumers during her career. Ms. Pang has extensive experience in case management and all facets of litigation: from a case's inception through the discovery process--including taking and defending depositions and preparing witnesses for depositions and trial--mediation and settlement negotiations, pretrial motion work, trial and post-trial motion work.

Prior to joining the firm, Ms. Pang lead the mass torts department of her last firm, where she managed the cases of over two thousand individual clients. There, Ms. Pang worked on a wide variety of complex state and federal matters which included cases involving pharmaceutical drugs, medical devices, auto defects, toxic torts, false advertising, and uninhabitable conditions. Ms. Pang was also trial counsel in the notable case, *Celestino Acosta et al. v. City of Long Beach et al.* (BC591412) which was brought on behalf of residents of a mobile home park built on a former trash dump and resulted in a \$39.5 million verdict after an eleven-week jury trial in Los Angeles Superior Court.

Ms. Pang received her J.D. from Loyola Law School. While in law school, Ms. Pang received a Top 10 Brief Award as a Scott Moot Court competitor, was chosen to be a member of the Scott Moot Court Honor's Board, and competed as a member of the National Moot Court Team. Ms. Pang was also a Staffer and subsequently an Editor for Loyola's Entertainment Law Review as well as a Loyola Writing Tutor. During law school, Ms. Pang served as an extern for: the Hon. Rolf Treu (Los Angeles Superior Court), the Los Angeles City Attorney's Office, and the Federal Public Defender's Office. Ms. Pang obtained her undergraduate degree from the University of Southern California and worked in the healthcare industry prior to pursuing her career in law.

ROBERT V. PRONGAY is a partner in the Firm's Los Angeles office where he focuses on the investigation, initiation, and prosecution of complex securities cases on behalf of institutional and individual investors. Mr. Prongay's practice concentrates on actions to recover investment losses resulting from violations of the federal securities laws and various actions to vindicate shareholder rights in response to corporate and fiduciary misconduct.

Mr. Prongay has extensive experience litigating complex cases in state and federal courts nationwide. Since joining the Firm, Mr. Prongay has successfully recovered millions of dollars for investors victimized by securities fraud and has negotiated the implementation of significant corporate governance reforms aimed at preventing the recurrence of corporate wrongdoing.

Mr. Prongay was recently recognized as one of thirty lawyers included in the Daily Journal's list of Top Plaintiffs Lawyers in California for 2017. Several of Mr. Prongay's cases have received national and regional press coverage. Mr. Prongay has been interviewed by journalists and writers for national and industry publications, ranging from *The Wall Street Journal* to the *Los Angeles Daily Journal*. Mr. Prongay has appeared as a guest on Bloomberg Television where he was interviewed about the securities litigation stemming from the high-profile initial public offering of Facebook, Inc.

Mr. Prongay received his Bachelor of Arts degree in Economics from the University of Southern California and his Juris Doctor degree from Seton Hall University School of Law. Mr. Prongay is also an alumnus of the Lawrenceville School.

DANIELLA QUITT, a partner in the firm's New York office, graduated from Fordham University School of Law in 1988, is a member of the Bar of the State of New York, and is also admitted to the United States District Courts for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Second, Fifth, and Ninth Circuits, and the United States Supreme Court.

Ms. Quitt has extensive experience in successfully litigating complex class actions from inception to trial and has played a significant role in numerous actions wherein substantial benefits were conferred upon plaintiff shareholders, such as *In re Safety-Kleen Corp. Stockholders Litigation*, (D.S.C.) (settlement fund of \$44.5 million); *In re Laidlaw Stockholders Litigation*, (D.S.C.) (settlement fund of \$24 million); *In re UNUMProvident Corp. Securities Litigation*, (D. Me.) (settlement fund of \$45 million); *In re Harnischfeger Industries* (E.D. Wisc.) (settlement fund of \$10.1 million); *In re Oxford Health Plans, Inc. Derivative Litigation*, (S.D.N.Y.) (settlement benefit of \$13.7 million and corporate therapeutics); *In re JWP Inc. Securities Litigation*, (S.D.N.Y.) (settlement fund of \$37 million); *In re Home Shopping Network, Inc., Derivative Litigation*, (S.D. Fla.) (settlement benefit in excess of \$20 million); *In re Graham-Field Health Products, Inc. Securities Litigation*, (S.D.N.Y.) (settlement fund of \$5.65 million); *Benjamin v. Carusona*, (E.D.N.Y.) (prosecuted action on behalf of minority shareholders which resulted in a change of control from majority-controlled management at Gurney's Inn Resort & Spa Ltd.); *In re Rexel Shareholder Litigation*, (Sup. Ct. N.Y. County) (settlement benefit in excess of \$38 million); and *Croyden Assoc. v. Tesoro Petroleum Corp., et al.*, (Del. Ch.) (settlement benefit of \$19.2 million).

In connection with the settlement of *Alessi v. Beracha*, (Del. Ch.), a class action brought on behalf of the former minority shareholders of Earthgrains, Chancellor Chandler commented: "I give credit where credit is due, Ms. Quitt. You did a good job and got a good result, and you should be proud of it."

Ms. Quitt has focused her practice on shareholder rights, securities class actions, and ERISA class actions but also handles general commercial and consumer litigation. Ms. Quitt serves as a member of the S.D.N.Y. ADR Panel and has been consistently selected as a New York Metro Super Lawyer.

JONATHAN M. ROTTER leads the Firm's intellectual property litigation practice and has extensive experience in class action litigation, including in the fields of data privacy, digital content, securities, consumer protection, and antitrust. His cases often involve technical and scientific issues, and he excels at the critical skill of understanding and organizing complex subject matter in a way helpful to judges, juries, and ultimately, the firm's clients. Since joining the firm, he has played a key role in cases recovering over \$100 million. He handles cases on contingency, partial contingency, and hourly bases, and works collaboratively with other lawyers and law firms across the country.

Before joining the firm, Mr. Rotter served for three years as the first Patent Pilot Program Law Clerk at the United States District Court for the Central District of California, both in Los Angeles and Orange County. There, he assisted the Honorable S. James Otero, Andrew J. Guilford, George H. Wu, John A. Kronstadt, and Beverly Reid O'Connell with hundreds of patent cases in every major field of technology, from complaint to post-trial motions, advised on case management strategy, and organized and provided judicial education. Mr. Rotter also served as a law clerk for the Honorable Milan D. Smith, Jr. on the United States Court of Appeals for the Ninth Circuit, working on the full range of matters handled by the Circuit.

Before his service to the courts, Mr. Rotter practiced at an international law firm, where he argued appeals at the Federal Circuit, Ninth Circuit, and California Court of Appeal, tried cases, argued motions, and managed all aspects of complex litigation. He also served as a volunteer criminal prosecutor for the Los Angeles City Attorney's Office.

Mr. Rotter graduated with honors from Harvard Law School in 2004. He served as an editor of the Harvard Journal of Law & Technology, was a Fellow in Law and Economics at the John M. Olin Center for Law, Economics, and Business at Harvard Law School, and a Fellow in Justice, Welfare, and Economics at the Harvard University Weatherhead Center For International Affairs. He graduated with honors from the University of California, San Diego in 2000 with a B.S. in molecular biology and a B.A. in music.

Mr. Rotter serves on the Merit Selection Panel for Magistrate Judges in the Central District of California, and served on the Model Patent Jury Instructions and Model Patent Local Rules subcommittees of the American Intellectual Property Law Association. He has written extensively on intellectual property issues, and has been honored for his work with legal service organizations. He is admitted to practice in California and before the United States Courts of Appeals for the First, Second, Ninth and Federal Circuits, the United States District Courts for the Northern, Central, and Southern Districts of California, and the United States Patent & Trademark Office.

KEVIN F. RUF graduated from the University of California at Berkeley with a Bachelor of Arts in Economics and earned his Juris Doctor degree from the University of Michigan. He was an associate at the Los Angeles firm Manatt Phelps and Phillips from 1988 until 1992, where he specialized in commercial litigation. In 1993, he joined the firm Corbin & Fitzgerald (with future federal district court Judge Michael Fitzgerald) specializing in white collar criminal defense work.

Kevin joined the Glancy firm in 2001 and works on a diverse range of trial and appellate cases; he is also head of the firm's Labor practice. Kevin has successfully argued a number of important appeals, including in the 9th Circuit Court of Appeals. He has twice argued cases before the California Supreme Court – winning both.

In *Smith v. L'Oreal* (2006), after Kevin's winning arguments, the California Supreme Court established a fundamental right of all California workers to immediate payment of all earnings at the conclusion of their employment.

Kevin gave the winning oral argument in one of the most talked about and wide-reaching California Supreme Court cases of recent memory: *Lee v. Dynamex* (2018). The Dynamex decision altered 30 years of California law and established a new definition of employment that brings more workers within the protections of California’s Labor Code. The California legislature was so impressed with the Dynamex result that promulgated AB5, a statute to formalize this new definition of employment and expand its reach.

Kevin won the prestigious California Lawyer of the Year (CLAY) award in 2019 for his work on the *Dynamex* case.

In 2021, Kevin was named by California’s legal paper of record, the Daily Journal, as one of 18 California “Lawyers of the Decade.”

Kevin has been named three times as one of the Daily Journal’s “Top 75 Employment Lawyers.”

Since 2014, Kevin has been an elected member of the Ojai Unified School District Board of Trustees. Kevin was also a Main Company Member of the world-famous Groundlings improv and sketch comedy troupe – where “everyone else got famous.”

BENJAMIN I. SACHS-MICHAELS, a partner in the firm’s New York office, graduated from Benjamin N. Cardozo School of Law in 2011. His practice focuses on shareholder derivative litigation and class actions on behalf of shareholders and consumers.

While in law school, Mr. Sachs-Michaels served as a judicial intern to Senior United States District Judge Thomas J. McAvoy in the United States District Court for the Northern District of New York and was a member of the Cardozo Journal of Conflict Resolution.

Mr. Sachs-Michaels is a member of the Bar of the State of New York. He is also admitted to the United States District Courts for the Southern and Eastern Districts of New York and the United States Court of Appeals for the Second Circuit.

CASEY E. SADLER is a native of New York, New York. After graduating from the University of Southern California, Gould School of Law, Mr. Sadler joined the Firm in 2010. While attending law school, Mr. Sadler externed for the Enforcement Division of the Securities and Exchange Commission, spent a summer working for P.H. Parekh & Co. – one of the leading appellate law firms in New Delhi, India – and was a member of USC’s Hale Moot Court Honors Program.

Mr. Sadler’s practice focuses on securities and consumer litigation. A partner in the Firm’s Los Angeles office, Mr. Sadler is admitted to the State Bar of California and the United States District Courts for the Northern, Southern, and Central Districts of California.

EX KANO S. SAMS II earned his Bachelor of Arts degree in Political Science from the University of California Los Angeles. Mr. Sams earned his Juris Doctor degree from the University of California Los Angeles School of Law, where he served as a member of the *UCLA Law Review*. After law school, Mr. Sams practiced class action civil rights litigation

on behalf of plaintiffs. Subsequently, Mr. Sams was a partner at Coughlin Stoia Geller Rudman & Robbins LLP (currently Robbins Geller Rudman & Dowd LLP), where his practice focused on securities and consumer class actions on behalf of investors and consumers.

During his career, Mr. Sams has served as lead counsel in dozens of securities class actions and complex-litigation cases, and has worked on cases at all levels of the state and federal court systems throughout the United States. Mr. Sams was one of the counsel for respondents in *Cyan, Inc. v. Beaver Cty. Employees Ret. Fund*, 138 S. Ct. 1061 (2018), in which the United States Supreme Court ruled unanimously in favor of respondents, holding that: (1) the Securities Litigation Uniform Standards Act of 1998 (“SLUSA”) does not strip state courts of jurisdiction over class actions alleging violations of only the Securities Act of 1933; and (2) SLUSA does not empower defendants to remove such actions from state to federal court. Mr. Sams also participated in a successful appeal before a Fifth Circuit panel that included former United States Supreme Court Justice Sandra Day O’Connor sitting by designation, in which the court unanimously vacated the lower court’s denial of class certification, reversed the lower court’s grant of summary judgment, and issued an important decision on the issue of loss causation in securities litigation: *Alaska Electrical Pension Fund v. Flowserve Corp.*, 572 F.3d 221 (5th Cir. 2009). The case settled for \$55 million.

Mr. Sams has also obtained other significant results. Notable examples include: *Beezley v. Fenix Parts, Inc.*, No. 1:17-CV-7896, 2018 WL 3454490 (N.D. Ill. July 13, 2018) (denying motion to dismiss); *In re Flowers Foods, Inc. Sec. Litig.*, No. 7:16-CV-222 (WLS), 2018 WL 1558558 (M.D. Ga. Mar. 23, 2018) (largely denying motion to dismiss; case settled for \$21 million); *In re King Digital Entm’t plc S’holder Litig.*, No. CGC-15-544770 (San Francisco Superior Court) (case settled for \$18.5 million); *In re Castlight Health, Inc. S’holder Litig.*, Lead Case No. CIV533203 (California Superior Court, County of San Mateo) (case settled for \$9.5 million); *Wiley v. Envivio, Inc.*, Master File No. CIV517185 (California Superior Court, County of San Mateo) (case settled for \$8.5 million); *In re CafePress Inc. S’holder Litig.*, Master File No. CIV522744 (California Superior Court, County of San Mateo) (case settled for \$8 million); *Estate of Gardner v. Continental Casualty Co.*, No. 3:13-cv-1918 (JBA), 2016 WL 806823 (D. Conn. Mar. 1, 2016) (granting class certification); *Forbush v. Goodale*, No. 33538/2011, 2013 WL 582255 (N.Y. Sup. Feb. 4, 2013) (denying motions to dismiss); *Curry v. Hansen Med., Inc.*, No. C 09-5094 CW, 2012 WL 3242447 (N.D. Cal. Aug. 10, 2012) (upholding complaint; case settled for \$8.5 million); *Wilkof v. Caraco Pharm. Labs., Ltd.*, 280 F.R.D. 332 (E.D. Mich. 2012) (granting class certification); *Puskala v. Koss Corp.*, 799 F. Supp. 2d 941 (E.D. Wis. 2011) (upholding complaint); *Mishkin v. Zynex Inc.*, Civil Action No. 09-cv-00780-REB-KLM, 2011 WL 1158715 (D. Colo. Mar. 30, 2011) (denying motion to dismiss); and *Tsirekidze v. Syntax-Brilliant Corp.*, No. CV-07-02204-PHX-FJM, 2009 WL 2151838 (D. Ariz. July 17, 2009) (granting class certification; case settled for \$10 million).

Additionally, Mr. Sams has successfully represented consumers in class action litigation. Mr. Sams worked on nationwide litigation and a trial against major tobacco companies, and in statewide tobacco litigation that resulted in a \$12.5 billion recovery for California cities and counties in a landmark settlement. He also was a principal attorney in a

consumer class action against one of the largest banks in the country that resulted in a substantial recovery and a change in the company's business practices. Mr. Sams also participated in settlement negotiations on behalf of environmental organizations along with the United States Department of Justice and the Ohio Attorney General's Office that resulted in a consent decree requiring a company to perform remediation measures to address the effects of air and water pollution. Additionally, Mr. Sams has been an author or co-author of several articles in major legal publications, including "9th Circuit Decision Clarifies Securities Fraud Loss Causation Rule" published in the February 8, 2018 issue of the *Daily Journal*, and "Market Efficiency in the World of High-Frequency Trading" published in the December 26, 2017 issue of the *Daily Journal*.

LEANNE HEINE SOLISH is a partner in GPM's Los Angeles office. Her practice focuses on complex securities litigation.

Ms. Solish has extensive experience litigating complex cases in federal courts nationwide. Since joining GPM in 2012, Ms. Solish has helped secure several large class action settlements for injured investors, including: *The City of Farmington Hills Employees Retirement System v. Wells Fargo Bank*, Case No. 10-4372--DWF/JJG (D. Minn.) (\$62.5 million settlement on behalf of participants in Wells Fargo's securities lending program. The settlement was reached on the eve of trial and ranked among the largest recoveries achieved in a securities lending class action stemming from the 2008 financial crisis.); *Mild v. PPG Industries, Inc. et al.*, Case No. 2:18-cv-04231 (C.D. Cal.) (\$25 million settlement); *In re Penn West Petroleum Ltd. Securities Litigation*, Case No. 1:14-cv-06046-JGK (S.D.N.Y.) (\$19 million settlement for the U.S. shareholder class as part of a \$39 million global settlement); *In re ITT Educational Services, Inc. Securities Litigation (Indiana)*, Case No. 1:14-cv-01599-TWP-DML (\$12.5375 million settlement); *In re Doral Financial Corporation Securities Litigation*, Case No. 3:14-cv-01393-GAG (D.P.R.) (\$7 million settlement); *Larson v. Insys Therapeutics Incorporated, et al.*, Lead Case No. 14-cv-01043-PHX-GMS (D. Ariz.) (\$6.125 million settlement); *In re Unilife Corporation Securities Litigation*, Case No. 1:16-cv-03976-RA (\$4.4 million settlement); and *In re K12 Inc. Securities Litigation*, Case No. 4:16-cv-04069-PJH (N.D. Cal.) (\$3.5 million settlement).

Super Lawyers Magazine has selected Ms. Solish as a "Rising Star" in the area of Securities Litigation for the past four consecutive years, 2016 through 2019.

Ms. Solish graduated *summa cum laude* with a B.S.M. in Accounting and Finance from Tulane University, where she was a member of the Beta Alpha Psi honors accounting organization and was inducted into the Beta Gamma Sigma Business Honors Society. Ms. Solish subsequently earned her J.D. from the University of Texas School of Law.

Ms. Solish is admitted to the State Bar of California, the Ninth Circuit Court of Appeals, and the United States District Courts for the Central, Northern, and Southern Districts of California. Ms. Solish is also a Registered Certified Public Accountant in Illinois.

GARTH A. SPENCER's work focuses on securities litigation on behalf of investors, as well as whistleblower, consumer and antitrust matters for plaintiffs. He has substantially

contributed to a number of GPM's successful cases, including *Robb v. Fitbit Inc.* (N.D. Cal.) (\$33 million settlement). Mr. Spencer joined the firm's New York office in 2016, and transferred to Los Angeles in 2020. Prior to joining GPM, he worked in the tax group of a transactional law firm, and pursued tax whistleblower matters as a sole practitioner.

DAVID J. STONE has a broad background in complex commercial litigation, with particular focus on litigating corporate fiduciary claims, securities, and contract matters. Mr. Stone maintains a versatile practice in state and federal courts, representing clients in a wide-range of matters, including corporate derivative actions, securities class actions, litigating claims arising from master limited partnership "drop down" transactions, litigating consumer class actions (including data breach claims) litigating complex debt instruments, fraudulent conveyance actions, and appeals. Mr. Stone also has developed a specialized practice in litigation on behalf of post-bankruptcy confirmation trusts, including investigating and prosecuting D&O claims and general commercial litigation. In addition, Mr. Stone counsels clients on general business matters, including contract negotiation and corporate organization.

Mr. Stone graduated from Boston University School of Law in 1994 and was the Law Review Editor. He earned his B.A. at Tufts University in 1988, graduating *cum laude*. Following law school, Mr. Stone served as a clerk to the Honorable Joseph Tauro, then Chief Judge of the U.S. District Court for the District of Massachusetts. Prior to joining GPM, Mr. Stone practiced at international law firms Cravath, Swaine & Moore LLP, Morrison & Foerster LLP, and Greenberg Traurig LLP.

Mr. Stone is a member of the bar in New York and California, and is admitted to practice before the United States District Courts for the Southern and Eastern Districts of New York, the Northern, Southern, and Central Districts of California, and the Court of Appeals for the Second and Third Circuits.

RAY D. SULENTIC is a partner in the firm's San Diego office where he litigates complex securities fraud, data privacy, and consumer fraud class actions. He also represents individuals in connection with the firm's SEC, CFTC, and qui tam whistleblower practice areas.

Before joining GPM, Mr. Sulentic worked extensively with financial markets as an institutional investor. His investment experience includes serving as a special situations (merger arbitrage) analyst at UBS O'Connor LLC, a multi-billion-dollar hedge fund in Chicago; and as a sell-side equity and commodity analyst for Bear Stearns & Co. Inc. in New York. While at Bear Stearns, Mr. Sulentic's investment analysis was featured in Barron's.

Following his career on Wall Street, Mr. Sulentic practiced law at DLA Piper LLP in San Diego, where he worked on securities litigation and corporate governance matters, and represented public companies facing investigations or inquiries by the SEC.

Since joining GPM, Mr. Sulentic has helped his clients successfully obtain significant settlements, including in complex accounting and securities fraud matters.

Mr. Sulentic's relevant legal experience includes:

- Represented lead plaintiffs in *In re Eros International PLC Securities Litigation*, 2:19-cv-14125-JMV-JSA (D.N.J.), a securities class action alleging violations of the Securities Exchange Act of 1934 (\$25 million settlement).
- Represented lead plaintiffs in *Shen v. Exela Technologies Inc. et al.*, 3:20-cv-00691 (N.D. Tex.), a securities class action alleging violations of the Securities Exchange Act of 1934 (\$5 million settlement).
- Represented lead plaintiffs in *In re Tintri Securities Litigation*, Case No. 17-civ-04321, San Mateo Superior Court, a securities class action alleging violations of Securities Act of 1933. The parties have reached an agreement to settle the case for \$7.0 million, subject to final court approval.
- Represented lead plaintiff in *Ivan Baron v. HyreCar Inc. et al.*, 2:21-cv-06918-FWS-JC (C.D. Cal), a securities class action alleging violations of the Securities Exchange Act of 1934. Plaintiffs in HyreCar defeated Defendants' motion to dismiss. The case is currently pending.
- Represented plaintiff in *Valenzuela v. Hacopian Design & Development Group LLC et al.*, Case No. 37-2022-101113-CU-BT-CTL, San Diego Superior Court (Valenzuela*) a fraud, conversion, and RICO case. In Valenzuela, Mr. Sulentic argued and won many motions including a motion for summary judgment in his client's favor on one cause of action; a motion denying one defendant leave to amend her answer; a motion deeming his client's requests for admission admitted; and discovery sanctions against two defendants. Following a bench trial against one defendant, and a default judgment prove up hearing against two other defendants, the court in Valenzuela awarded Mr. Sulentic's client a combined judgment of over \$440,000, most of which was comprised of punitive damages on compensatory damages of just over \$24,000.

**Valenzuela* was a pro bono matter not litigated by GPM, but by Mr. Sulentic in his individual capacity.

KARA M. WOLKE is a partner in the firm's Los Angeles office. Ms. Wolke specializes in complex litigation, including the prosecution of securities fraud, derivative, consumer, and wage and hour class actions. She also has extensive experience in appellate advocacy in both State and Federal Circuit Courts of Appeals.

With over fifteen years of experience in financial class action litigation, Ms. Wolke has helped to recover hundreds of millions of dollars for injured investors, consumers, and employees. Notable cases include: *Christine Asia Co. Ltd., et al. v. Jack Yun Ma, et al.*, Case No. 15-md-02631 (S.D.N.Y.) (\$250 million securities class action settlement); *Farmington Hills Employees' Retirement System v. Wells Fargo Bank*, Case No. 10-4372 (D. Minn.) (\$62.5 million settlement on behalf of participants in Wells Fargo's securities lending program. The settlement was reached on the eve of trial and ranked among the

largest recoveries achieved in a securities lending class action stemming from the 2008 financial crisis.); *Schleicher, et al. v. Wendt, et al.* (Conseco), Case No. 02-cv-1332 (S.D. Ind.) (\$41.5 million securities class action settlement); *Lapin v. Goldman Sachs*, Case No. 03-850 (S.D.N.Y.) (\$29 million securities class action settlement); *In Re: Mannkind Corporation Securities Litigation*, Case No. 11-929 (C.D. Cal) (approximately \$22 million settlement – \$16 million in cash plus stock); *Jenson v. First Trust Corp.*, Case No. 05-3124 (C.D. Cal.) (\$8.5 million settlement of action alleging breach of fiduciary duty and breach of contract against trust company on behalf of a class of elderly investors); and *Pappas v. Naked Juice Co.*, Case No. 11-08276 (C.D. Cal.) (\$9 million settlement in consumer class action alleging misleading labeling of juice products as “All Natural”).

Ms. Wolke has been named a Super Lawyers “Rising Star,” and her work on behalf of investors has earned her recognition as a LawDragon Leading Plaintiff Financial Lawyer for 2019 and 2020.

With a background in intellectual property, Ms. Wolke was a part of the team of lawyers who successfully challenged the claim of copyright ownership to the song “*Happy Birthday to You*” on behalf of artists and filmmakers who had been forced to pay hefty licensing fees to publicly sing the world’s most famous song. In the resolution of that action, the defendant music publishing company funded a settlement of \$14 million and, significantly, agreed to relinquish the song to the public domain. Previously, Ms. Wolke penned an article regarding the failure of U.S. Copyright Law to provide an important public performance right in sound recordings, 7 Vand. J. Ent. L. & Prac. 411, which was nationally recognized and received an award by the American Bar Association and the Grammy® Foundation.

Committed to the provision of legal services to the poor, disadvantaged, and other vulnerable or disenfranchised individuals and groups, Ms. Wolke also oversees the Firm’s *pro bono practice*. Ms. Wolke currently serves as a volunteer attorney for KIND (Kids In Need of Defense), representing unaccompanied immigrant and refugee children in custody and deportation proceedings, and helping them to secure legal permanent residency status in the U.S.

Ms. Wolke graduated *summa cum laude* with a Bachelor of Science in Economics from The Ohio State University in 2001. She subsequently earned her J.D. (with honors) from Ohio State, where she was active in Moot Court and received the Dean’s Award for Excellence during each of her three years.

Ms. Wolke is admitted to the State Bar of California, the Ninth Circuit Court of Appeals, as well as the United States District Courts for the Northern, Southern, and Central Districts of California. She lives with her husband and two sons in Los Angeles.

OF COUNSEL

PETER A. BINKOW has prosecuted lawsuits on behalf of consumers and investors in state and federal courts throughout the United States. He served as Lead or Co-Lead Counsel in many class action cases, including: *In re Mercury Interactive Securities*

Litigation (\$117.5 million recovery); *The City of Farmington Hills Retirement System v Wells Fargo* (\$62.5 million recovery); *Schleicher v Wendt* (Conseco Securities litigation - \$41.5 million recovery); *Lapin v Goldman Sachs* (\$29 million recovery); *In re Heritage Bond Litigation* (\$28 million recovery); *In re National Techteam Securities Litigation* (\$11 million recovery for investors); *In re Lason Inc. Securities Litigation* (\$12.68 million recovery), *In re ESC Medical Systems, Ltd. Securities Litigation* (\$17 million recovery); and many others. In *Schleicher v Wendt*, Mr. Binkow successfully argued the seminal Seventh Circuit case on class certification, in an opinion authored by Chief Judge Frank Easterbrook. He has argued and/or prepared appeals before the Ninth Circuit, Seventh Circuit, Sixth Circuit and Second Circuit Courts of Appeals.

Mr. Binkow joined the Firm in 1994. He was born on August 16, 1965 in Detroit, Michigan. Mr. Binkow obtained a Bachelor of Arts degree from the University of Michigan in 1988 and a Juris Doctor degree from the University of Southern California in 1994.

MARK S. GREENSTONE specializes in consumer, financial fraud and employment-related class actions. Possessing significant law and motion and trial experience, Mr. Greenstone has represented clients in multi-million dollar disputes in California state and federal courts, as well as the Court of Federal Claims in Washington, D.C.

Mr. Greenstone received his training as an associate at Sheppard, Mullin, Richter & Hampton LLP where he specialized in complex business litigation relating to investment management, government contracts and real estate. Upon leaving Sheppard Mullin, Mr. Greenstone founded an internet-based company offering retail items on multiple platforms nationwide. He thereafter returned to law bringing a combination of business and legal skills to his practice.

Mr. Greenstone graduated Order of the Coif from the UCLA School of Law. He also received his undergraduate degree in Political Science from UCLA, where he graduated Magna Cum Laude and was inducted into the Phi Beta Kappa honor society.

Mr. Greenstone is a member of the Consumer Attorneys Association of Los Angeles, the Santa Monica Bar Association and the Beverly Hills Bar Association. He is admitted to practice in state and federal courts throughout California.

ROBERT I. HARWOOD, Of Counsel to the firm, graduated from William and Mary Law School in 1971, and has specialized in securities law and securities litigation since beginning his career in 1972 at the Enforcement Division of the New York Stock Exchange. Mr. Harwood was a founding member of Harwood Feffer LLP. He has prosecuted numerous securities, class, derivative, and ERISA actions. He is a member of the Trial Lawyers' Section of the New York State Bar Association and has served as a guest lecturer at trial advocacy programs sponsored by the Practising Law Institute. In a statewide survey of his legal peers published by Super Lawyers Magazine, Mr. Harwood has been consistently selected as a "New York Metro Super Lawyer." Super Lawyers are the top five percent of attorneys in New York, as chosen by their peers and through the independent research. He is also a Member of the Board of Directors of the MFY Legal Services Inc., which provides free legal representation in civil matters to the poor and the

mentally ill in New York City. Since 1999, Mr. Harwood has also served as a Village Justice for the Village of Dobbs Ferry, New York.

Commenting on Mr. Harwood's abilities, in *In re Royal Dutch/Shell Transport ERISA Litigation*, (D.N.J.), Judge Bissell stated:

the Court knows the attorneys in the firms involved in this matter and they are highly experienced and highly skilled in matters of this kind. Moreover, in this case it showed. Those efforts were vigorous, imaginative and prompt in reaching the settlement of this matter with a minimal amount of discovery.... So both skill and efficiency were brought to the table here by counsel, no doubt about that.

Likewise, Judge Hurley stated in connection with *In re Olsten Corporation Securities Litigation*, No. 97 CV-5056 (E.D.N.Y. Aug. 31, 2001), wherein a settlement fund of \$24.1 million was created: "The quality of representation here I think has been excellent." Mr. Harwood was lead attorney in *Meritt v. Eckerd*, No. 86 Civ. 1222 (E.D.N.Y. May 30, 1986), where then Chief Judge Weinstein observed that counsel conducted the litigation with "speed and skill" resulting in a settlement having a value "in the order of \$20 Million Dollars." Mr. Harwood prosecuted the *Hoeniger v. Aylsworth* class action litigation in the United States District Court for the Western District of Texas (No. SA-86-CA-939), which resulted in a settlement fund of \$18 million and received favorable comment in the August 14, 1989 edition of *The Wall Street Journal* ("*Prospector Fund Finds Golden Touch in Class Action Suit*" p. 18, col. 1). Mr. Harwood served as co-lead counsel in *In Re Interco Incorporated Shareholders Litigation*, Consolidated C.A. No. 10111 (Delaware Chancery Court) (May 25, 1990), resulting in a settlement of \$18.5 million, where V.C. Berger found, "This is a case that has an extensive record that establishes it was very hard fought. There were intense efforts made by plaintiffs' attorneys and those efforts bore very significant fruit in the face of serious questions as to ultimate success on the merits."

Mr. Harwood served as lead counsel in *Morse v. McWhorter* (Columbia/HCA Healthcare Securities Litigation), (M.D. Tenn.), in which a settlement fund of \$49.5 million was created for the benefit of the Class, as well as *In re Bank One Securities Litigation*, (N.D. Ill.), which resulted in the creation of a \$45 million settlement fund. Mr. Harwood also served as co-lead counsel in *In re Safety-Kleen Corp. Stockholders Litigation*, (D.S.C.), which resulted in a settlement fund of \$44.5 million; *In re Laidlaw Stockholders Litigation*, (D.S.C.), which resulted in a settlement fund of \$24 million; *In re AIG ERISA Litigation*, (S.D.N.Y.), which resulted in a settlement fund of \$24.2 million; *In re JWP Inc. Securities Litigation*, (S.D.N.Y.), which resulted in a \$37 million settlement fund; *In re Oxford Health Plans, Inc. Derivative Litigation*, (S.D.N.Y.), which resulted in a settlement benefit of \$13.7 million and corporate therapeutics; and *In re UNUMProvident Corp. Securities Litigation*, (D. Me.), which resulted in the creation of settlement fund of \$45 million. Mr. Harwood has also been one of the lead attorneys in litigating claims in *In re FedEx Ground Package Inc. Employment Practices Litigation*, No. 3:05-MD-527 (MDL 1700), a multi-district litigation concerning employment classification of pickup and delivery drivers which resulted in a \$242,000,000 settlement.

ERIKA SHAPIRO has extensive experience in a broad range of litigation matters. Until 2019, Ms. Shapiro's work primarily focused on complex antitrust cases involving pharmaceutical companies, and through this work, she helped successfully defend pharmaceutical companies against antitrust and unfair competition allegations, with a particular concentration on the Hatch-Waxman Act, product hopping, and reverse payment settlement allegations. As of 2019, Ms. Shapiro has represented clients in a vast array of litigation, including commercial real estate matters, with a particular focus on the global COVID-19 pandemic's impact on commercial real estate, bankruptcy matters, commercial litigation involving breach of contract, tort, trademark infringement, and trusts and estates law with a focus on will contests. Ms. Shapiro has further managed multiple cases defending physicians and hospitals against allegations of malpractice.

Ms. Shapiro is committed to the academic community, and is the Founder and CEO of Study Songs, an app aimed at helping students study for the multistate bar exam through melodies contained in over 80 original songs and through pop-up definitions of over 1200 legal terms and concepts.

Ms. Shapiro's publications include: *Third Circuit Holds, "Give Peace a Chance": The De Beers Litigation and the Potential Power of Settlement*, Jack E. Pace, III, Erika L. Shapiro, 27-SPG Antitrust 48 (2013).

Ms. Shapiro graduated from Washington University in St. Louis with a Bachelor of Arts degree. She received her Juris Doctor degree from Georgetown University Law Center. She also earned a Master's degree in Economic Global Law from Sciences-Po Universite.

SENIOR COUNSEL

PAVITHRA RAJESH is Senior Counsel in the firm's Los Angeles office. She specializes in fact discovery, including pre-litigation investigation, and develops legal theories in securities, derivative, and privacy-related matters.

Ms. Rajesh has unique writing experience from her judicial externship for the Patent Pilot Program in the United States District Court for the Central District of California, where she worked closely with the Clerk and judges in the program on patent cases. Drawing from this experience, Ms. Rajesh is passionate about expanding the firm's Intellectual Property practice, and she engages with experts to understand complex technology in a wide range of patents, including network security and videogame electronics.

Ms. Rajesh graduated from University of California, Santa Barbara with a Bachelor of Science degree in Mathematics and a Bachelor of Arts degree in Psychology. She received her Juris Doctor degree from UCLA School of Law. While in law school, Ms. Rajesh was an Associate Editor for the UCLA Law Review.

CHRISTOPHER M. THOMS is Senior Discovery Counsel in Glancy, Prongay & Murray's Los Angeles office. His practice includes large-scale electronic discovery encompassing

all stages of litigation, securities and anti-trust litigation. He manages attorneys in fact-finding for depositions, expert discovery, and trial preparation.

Prior to joining Glancy, Prongay & Murray, Christopher worked as a staff attorney at O'Melveny & Meyers LLP where he managed eDiscovery issues in complex class actions and multi-district litigations. Chris also worked as a contract attorney for various law firms in Los Angeles.

MELISSA WRIGHT is Senior Counsel in the firm's Los Angeles office. Ms. Wright specializes in complex litigation, including the prosecution of securities fraud and consumer class actions. She has particular expertise in all aspects of the discovery phase of litigation, including drafting and responding to discovery requests, negotiating protocols for the production of Electronically Stored Information (ESI) and all facets of ESI discovery, and assisting in deposition preparation. She has managed multiple document production and review projects, including the development of ESI search terms, overseeing numerous attorneys reviewing large document productions, drafting meet and confer correspondence and motions to compel where necessary, and coordinating the analysis of information procured during the discovery phase for utilization in substantive motions or settlement negotiations.

Ms. Wright received her J.D. from the UC Davis School of Law in 2012, where she was a board member of Tax Law Society and externed for the California Board of Equalization's Tax Appeals Assistance Program focusing on consumer use tax issues. Ms. Wright also graduated from NYU School of Law, where she received her LL.M. in Taxation in 2013.

ASSOCIATES

REBECCA DAWSON specializes in complex civil litigation, class action securities litigation, and anti-trust litigation.

Ms. Dawson previously worked at a highly respected plaintiff-side class action firm specializing in mass torts and anti-trust litigation where she managed a wide variety of complex state and federal matters including false advertising, environmental torts and product liability claims.

Ms. Dawson has also held two prestigious clerkships. She was a clerking intern for the Chief Justice of the Court of International Trade during law school. After law school, she clerked at the New York Supreme Court where she handled hundreds of complex commercial and civil litigation decisions. Ms. Dawson also participated in the Securities and Exchange Commission Honors program in the Office of the Investors Advocate. Prior to law school, she worked for the Brooklyn Bar Association. Ms. Dawson also has a background in financial data analysis.

Ms. Dawson earned her J.D. from City University of New York School of Law, where she was a Moot Court Competition Problem Author. She earned her B.A. from Bard College at Simon's Rock, where she majored in Political Science with a minor in Economics.

CHRIS DEL VALLE is an experienced attorney who has been a valuable member of the Glancy Prongay & Murray LLP team since 2017. During his time at the firm, he has worked on a range of complex securities fraud cases, including In re Akorn, Inc. Securities Litigation, Case No. 15-CV-01944, (N.D. Ill.); In re Yahoo! Inc. Securities Litigation, Case No. 17-CV-00373-LHK (N.D. Cal.); In re Endurance International Group Holdings, Case No. 1:15-cv-11775-GAO; In re LSB Industries, Inc. Securities Litigation, Case No. 1:15-cv-07614-RA-GWG; In re Alibaba Group Holding Limited Securities Litigation, Case No. 1:15-md-02631 (CM); In re Community Health Systems Inc, Case No.: 3:19-cv-00461.

One of Chris' most notable recent cases was Hartpence v. Kinetic Concepts, Inc., No. 19-55823 (9th Cir. 2022), alleging violations of the False Claims Act (FCA). Chris was part of the legal team that successfully represented a whistleblower in obtaining 9th Circuit reversal of the lower court's order granting summary judgment. This victory established Chris as a leading attorney in the field of FCA litigation.

With highly technical expertise in electronic discovery, Chris manages all facets of the firm's e-discovery needs, including crafting advanced search algorithms, predictive coding, and technology-assisted review. Chris also has a wealth of experience in deposition preparation, expert discovery, and preparing for summary judgment and trial.

Chris' experience prior to joining GPM includes trial and discovery preparation for complex corporate securities fraud litigation, patent prosecution, oral arguments, injunction hearings, trial work, mediations, drafting and negotiating contracts, depositions, and client intake.

He received a Bachelor of Arts degree from S.U.N.Y. Buffalo, majoring in English Literature/Journalism, and a Juris Doctor from California Western School of Law in San Diego. Chris is a proud native of Buffalo, New York, and a passionate fan of the Buffalo Bills, hosting a weekly podcast entitled The Bills Dudes. In addition to his legal work, Chris enjoys traveling, playing basketball, archery and is on a quest to locate the most flavorful tequila and mezcal ever produced in Mexico. With his experience in securities litigation and a strong educational background, Chris Del Valle is a valuable member of the GPM team.

CHRISTOPHER FALLON focuses on securities, consumer, and anti-trust litigation. Prior to joining the firm, Mr. Fallon was a contract attorney with O'Melveny & Myers LLP working on anti-trust and business litigation disputes. He is a Certified E-Discovery Specialist through the Association of Certified E-Discovery Specialists (ACEDS).

Mr. Fallon earned his J.D. and a Certificate in Dispute Resolution from Pepperdine Law School in 2004. While attending law school, Christopher worked at the Pepperdine Special Education Advocacy Clinic and interned with the Rhode Island Office of the Attorney General. Prior to attending law school, he graduated from Boston College with a Bachelor of Arts in Economics and a minor in Irish Studies, then served as Deputy Campaign Finance Director on a U.S. Senate campaign.

HOLLY HEATH specializes in managing all aspects of discovery and trial preparation in securities and consumer fraud class actions. Since joining the firm in 2017, Ms. Heath has participated in cases that have led to over \$100 million in recoveries for consumers and investors.

Ms. Heath started her career at a boutique business law firm in Century City that targeted trademark infringement. After that, Ms. Heath worked as a contract attorney for several New York firms including Gibson Dunn and Sullivan & Cromwell. Ms. Heath has handled various complex litigation matters such as patent infringement, anti-trust, and banking regulations.

While in law school, Ms. Heath advocated for children's rights at Children's Legal Services and served as a student attorney for Greater Boston Legal Services.

THOMAS J. KENNEDY works out of the New York office, where he focuses on securities, antitrust, mass torts, and consumer litigation. He received a Juris Doctor degree from St. John's University School of Law in 1995. At St. John's, he was a member of the ST. JOHN'S JOURNAL OF LEGAL COMMENTARY. Mr. Kennedy graduated from Miami University in 1992 with a Bachelor of Science degree in Accounting and has passed the CPA exam. Mr. Kennedy was previously associated with the law firm Murray Frank LLP.

JACOB M. SHOOSTER, an Associate in the firm's New York Midtown 5th Avenue office, graduated from Fordham University School of Law in 2023. Mr. Shooster's practice focuses on shareholder litigation.

Mr. Shooster graduated from the University of Michigan with a Bachelor of Arts degree in Philosophy. He graduated from Fordham University School of Law with a Concentration in Business and Financial Law. While in law school, Mr. Shooster supported the Public Corruption Bureau of the Queens County District Attorney's Office as well as the school's Federal Tax Litigation Clinic where he represented indigent U.S. taxpayers in controversies in federal and state courts. Additionally, he was awarded the cum laude Murray award for public service.

Mr. Shooster is pending admission to the State Bar of New York.

CHASE STERN concentrates his practice on complex commercial litigation, with a particular emphasis on securities fraud and consumer protection class actions, as well as shareholder derivative matters. For nearly a decade, Mr. Stern's practice has been largely dedicated to representing individual and corporate entity plaintiffs in complex commercial and class action litigation in state and federal courts throughout the country. Mr. Stern's work and experience over the course of his career have proven instrumental in vindicating his clients' rights and helping recover tens of millions of dollars on their behalf. His work and experience have also led to his recent recognition as a Super Lawyers® Rising Star for 2022 – 2023.

Mr. Stern holds a B.S. in Finance and Entrepreneurship & Emerging Enterprises from Syracuse University and a J.D. from California Western School of Law, graduating from both institutions with honors.

ROBERT YAN is an associate specializing in international cases involving foreign language documents and foreign clients. He has expertise in all aspects of pre-trial litigation, including document productions, deposition preparation, deposition outlines, witness preparation, compilation of privilege logs, and translation of documents into English. He has served as team lead for various document review projects, conducted QC on large document populations, and worked with lead counsel to meet production deadlines.

Robert is a native speaker of Mandarin Chinese and fluent in Japanese. Robert has volunteered his services in the Los Angeles area including at the Elder Law Clinic and monthly APABA Pro Bono Legal Help Clinic. In his free time, Robert likes to play tennis and dodgeball and watches Jeopardy every day with his wife.

EXHIBIT 7

**THE ROSEN LAW FIRM P.A.
BIOGRAPHY**

I. ATTORNEYS

LAURENCE ROSEN - MANAGING PARTNER

Laurence Rosen is a 1988 graduate of New York University School of Law. He earned an M.B.A. in finance and accounting at the University of Chicago Graduate School of Business and a B.A. in Economics from Emory University. Mr. Rosen served as a law clerk to the Honorable Stanley S. Brotman, Senior United States District Judge for the District of New Jersey. Mr. Rosen entered private practice as an associate at the law firm of Skadden Arps Slate Meagher & Flom in New York City where he participated in a number of complex securities class action and derivative litigation matters. He later served as an associate at McCarter & English in Newark, New Jersey where he specialized in securities and business litigation.

After practicing general securities and commercial litigation in New York City with Solton Rosen & Balakhovsky LLP, Mr. Rosen founded The Rosen Law Firm to represent investors exclusively in securities class actions and derivative litigation. Mr. Rosen is admitted to practice law in New York, California, Florida, New Jersey and the District of Columbia. Mr. Rosen is also admitted to practice before numerous United States District Courts throughout the country and the United States Court of Appeals for the Second, Fourth, and Sixth Circuits.

In 2019-2023 Lawdragon named Mr. Rosen as one of the 500 Leading Plaintiff Financial Lawyers. Mr. Rosen was also named by law360 as Titan of Plaintiffs' Bar for 2020. Mr. Rosen was selected to *Super Lawyers* in 2017-2023.

PHILLIP KIM – PARTNER

Mr. Kim graduated from Villanova University School of Law in 2002. He received a B.A. in Economics from The Johns Hopkins University in Baltimore, Maryland in 1999. Prior to joining

The Rosen Law Firm, Mr. Kim served as Assistant Corporation Counsel for the City of New York in the Special Federal Litigation Division. In that position, Mr. Kim defended a number of class action lawsuits, litigated numerous individual actions, and participated in more than seven trials. Mr. Kim focuses his practice on securities class actions and shareholder derivative litigation. Mr. Kim is admitted to the bar of the State of New York and admitted to practice in the Southern, Eastern, Northern and Western Districts of New York, the District of Colorado, the Eastern District of Wisconsin, and United States Court of Appeals for the Second, Sixth and Ninth Circuits.

In 2019-2023 Lawdragon named Mr. Kim as one of the 500 Leading Plaintiff Financial Lawyers. In 2023 Mr. Kim was selected to *Super Lawyers*. Mr. Kim was recognized by Best Lawyers in The Best Lawyers of America 2024.

JACOB A. GOLDBERG – PARTNER

Mr. Goldberg is a 1988 graduate of Columbia University. Mr. Goldberg received his J.D., *cum laude*, from the Temple University School of Law in 1992. For over 23 years, Mr. Goldberg has litigated complex cases at the highest levels, championing the rights of investors, employees and consumers. Mr. Goldberg has recovered over \$200 million for investors in securities class actions. In addition to serving in leadership roles in securities class actions, Mr. Goldberg has litigated many cases under state corporations laws, against faithless boards of directors both on behalf of shareholders, in the mergers and acquisitions context, and, derivatively, on behalf of corporations, to remedy harm to the corporation itself. Mr. Goldberg is admitted to practice law in the Commonwealth of Pennsylvania, New York, the United States Supreme Court, the United

States Court of Appeals for the Second, Third, Fourth and Sixth Circuits, and various United States District Courts across the country.

In 2019-2023 Lawdragon named Mr. Goldberg as one of the 500 Leading Plaintiff Financial Lawyers.

JONATHAN A. SAIDEL – PARTNER

Mr. Saidel has had a long and distinguished career in Pennsylvania politics, as well as in the roles of attorney, accountant and author. He served as Philadelphia city controller for four consecutive terms, each time earning reelection by a wide margin, and enacting financial reforms that have saved taxpayers upwards of \$500 million. Later, in 2010 he went on to campaign for lieutenant governor of Pennsylvania, where he was runner-up to Scott Conklin by only a few thousand votes out of almost 1 million cast. A Lifelong resident of Northeast Philadelphia, Mr. Saidel's tireless dedication to fiscal discipline reduced the city's tax burden and spurred economic development. Mr. Saidel also pushed for important business tax incentives and expanded minority and small business lending, all of which have revitalized the city, helping it prosper and come back from the brink of bankruptcy in the early 1990's to become one of the most vibrant cities on the East Coast.

Mr. Saidel's book, "Philadelphia: A New Urban Direction", is widely considered an essential guide for effective government and corporate governance and is required reading at many colleges and universities.

Mr. Saidel received his JD from the Widener University of Law and is a graduate of Temple University. He is also an adjunct lecturer at the University of Pennsylvania Fels Institute of Government, and Drexel University's MBA Program. In addition to being a Certified Public Account, Jonathan is a recipient of the National Association of Local Government Auditor's Knighton Award, the President's Council on Integrity and Efficiency Award for Excellence,

multiple special project awards from the National Association of Local Government Auditors, and the "Controller of the Year" award, a peer recognition presented by the Pennsylvania City Controllers Association.

SARA FUKS – PARTNER

Ms. Fuks graduated from Fordham University School of Law, *cum laude*, in February 2005, where she was a member of Fordham Law Review. She received her B.A. in Political Science, *magna cum laude*, from New York University in 2001. Ms. Fuks began her practice at Dewey Ballantine, LLP where she focused on general commercial litigation and then went on to prosecute numerous ERISA and securities class actions as an associate at Milberg LLP. Ms. Fuks is admitted to the bar of the State of New York and admitted to practice in the United States Southern and Eastern District Courts of New York. Ms. Fuks was selected to *SuperLawyers* in 2021-2023 and *SuperLawyers* Rising Stars in 2017-2019.

JONATHAN HORNE- PARTNER

Mr. Horne is a 2009 graduate of New York University School of Law, where he received the Lederman/Milbank Law, Economics, and Business fellowship, and holds a B.A. in Economics & Philosophy from the University of Toronto. Mr. Horne began his practice at Kaye Scholer LLP. Mr. Horne specializes in securities litigation. He is admitted to practice in New York and the United States District Courts for the District of Colorado and the Southern and Eastern Districts of New York. Mr. Horne was named a Super Lawyer – Rising Star for the New York Metro Area every year since 2015.

YU SHI – PARTNER

Mr. Shi received his J.D. from Columbia Law School in 2011 and his B.A., *cum laude*, from Columbia University in 2008. In 2022, Law360 named Mr. Shi as one of the top securities attorneys under the age of 40. He has been selected to *Super Lawyers* New York Metro Rising

Stars list each year since 2018. Mr. Shi began his career as a Special Assistant Corporation Counsel in the New York City Law Department's Economic Development Division. Mr. Shi joined The Rosen Law Firm in 2012 and focuses his practice on securities litigation. He is admitted to practice in the State of New York, the United States District Courts for the Eastern District of New York, Southern Districts of New York, and the District of Colorado, and the United States Court of Appeals for the Second Circuit. Mr. Shi was selected to *Super Lawyers* New York Metro Rising Star list from 2018-2022. Mr. Shi was selected to *Super Lawyers* in 2023.

JONATHAN STERN – PARTNER

Mr. Stern graduated from New York University School of Law in May of 2008, where he was a Development Editor of the Annual Survey of American Law. He received his B.A. in Philosophy with Honors from McGill University. Mr. Stern began his practice in the litigation department of Simpson Thacher & Bartlett LLP, and then went on to practice at the litigation boutique of Simon & Partners LLP, where he participated in a Federal trial. Mr. Stern is admitted to the bar of the State of New York and admitted to practice in the United States Southern and Eastern District Courts of New York and the United States Court of Appeals for the Second Circuit. for the First, Sixth, Seventh, Eighth and Ninth Circuits, and the United States Supreme Court.

JING CHEN - PARTNER

Ms. Chen received a Juris Doctor degree from Pace University School of Law in 2011, Juris Master degree from China University of Political Science and Law in Beijing, China and B.A. in English Literature and Linguistics from Shandong University in Jinan, China. She is admitted to practice in New York, New Jersey and China. Prior to joining The Rosen Law Firm, Ms. Chen practiced corporate law, commercial transactions and arbitration for over two years.

BRIAN ALEXANDER – PARTNER

Mr. Alexander graduated from Harvard Law School, *cum laude*, in 2008. He received a B.A. from Cornell University, *magna cum laude*, in 2003. Prior to joining the Rosen Law Firm, Mr. Alexander practiced complex commercial litigation at Boies Schiller Flexner LLP and other prominent law firms in New York. He also served as a law clerk to the Honorable Raymond J. Dearie of the United States District Court for the Eastern District of New York. He is admitted to practice in New York and in the United States District Courts for the Eastern and Southern Districts of New York.

ROBIN BRONZAFT HOWALD – COUNSEL

Ms. Howald is a graduate of Stanford Law School where she was a member of the Stanford Law Review. Ms. Howald earned her BA from Barnard College, *magna cum laude*. Ms. Howald joined the firm in 2021 and focuses her practice on securities litigation. For the last 15 years, Ms. Howald has prosecuted major securities litigations. She was one of the lead attorneys in cases that achieved settlements of \$250 million for injured investors, including *Schleicher v. Wendt*, 618 F.3d 679 (7th Cir. 2010) (\$41.5 million), *In re Mannkind Corp. Securities Litigation* (C.D. California) (\$23 million); *In re ECI Telecom Ltd. Securities Litigation* (Eastern District of Virginia) (\$21.75 million), *In re Gilat Satellite Networks, Ltd. Securities Litigation* (E.D.N.Y.) (\$20 million), *In re Musicmaker.com Securities Litigation*, 2001 WL 34062431 (C.D. Cal. 2001) (\$13.75 million), *In re Puda Coal Inc. Securities Litigation* (S.D.N.Y.) (\$8.6 million following reconsideration of grant of summary judgment), *Jenson v. Fiserv Trust Co.*, 256 F. App'x. 924 (9th Cir. 2007) (\$8.5 million recovered for victims of a Ponzi scheme). Ms. Howald is admitted to the bars of California, New York, the United States District Courts for the Eastern and Southern Districts of New York, the Central, Eastern, and Northern Districts of California, the Eastern District of Michigan, the United States Court of Appeals.

GONEN HAKLAY – COUNSEL

Mr. Haklay graduated from Stanford University School of Law in 1995. He received a B.A. in Political Science from The University of Massachusetts at Amherst in 1992. After several years as an associate at a large Philadelphia law firm, Mr. Haklay joined the Philadelphia District Attorney's office. As a prosecutor, he tried over 100 criminal jury cases and handled both capital and non-capital homicide cases. After 12 years as prosecutor, Mr. Haklay joined a prominent plaintiffs' firm where he tried over ten asbestos cases, recovering millions of dollars for his clients. As a young man, Mr. Haklay served as an infantryman in the Israel Defense Forces. Mr. Haklay is admitted to the bars of the Commonwealth of Pennsylvania, the State of New Jersey, the United States District Court for the Eastern District of Pennsylvania, and the United States Third Circuit Court of Appeals.

DANIEL TYRE-KARP – COUNSEL

Prior to joining The Rosen Law Firm in May 2018, Mr. Tyre-Karp was a senior associate in the securities litigation and corporate governance group at Weil, Gotshal & Manges, where he advised corporate and individual clients on a variety of high-stakes regulatory and litigation matters in state and federal courts. Mr. Tyre-Karp's extensive experience includes working on several of the largest recent shareholder class action litigations (*In re American International Group, Inc. 2008 Securities Litigation*, Docket No. 08-CV-4772 (S.D.N.Y.) and related opt-out actions; *In re El Paso Corporation Shareholder Litigation*, Docket No. 6949 (Del. Ch.)), participating in complex business and bankruptcy litigations (*In re Lehman Brothers Holdings, Inc., et al*, Docket No. 1:08-bk-13555 (Bankr. S.D.N.Y.)), and advising numerous clients facing FINRA and SEC investigations. Mr. Tyre-Karp graduated with honors from Wesleyan University in 2003 and received his J.D. from New York University School of Law in 2009, where he served as Senior Notes Editor of the *Journal of Legislation and Public Policy*. He is admitted to practice

in New York and the United States District Courts for the Southern and Eastern Districts of New York.

ERICA STONE- COUNSEL

Ms. Stone graduated from the Benjamin N. Cardozo School of Law in 2013. She received her B.A. in Political Science and Communications, *cum laude*, from the University of Pennsylvania in 2009. She is admitted to practice in New York, New Jersey, and the United States District Courts for the Southern District and Eastern District of New York, the District of New Jersey, and the Eastern District of Wisconsin.

JOSHUA BAKER – COUNSEL

Mr. Baker graduated from the New York University School of Law in 2013. He received a B.A. from the University of Maryland in 2009. Prior to joining the Rosen Law Firm, Mr. Baker practiced complex commercial litigation for a New York firm. He is admitted to practice in New York, Massachusetts, and United States District Courts for the Eastern and Southern Districts of New York.

BRENT LAPOINTE – COUNSEL

Mr. LaPointe received his J.D., *cum laude*, from the University of Michigan Law School in 2010, where he served as an Articles Editor on both the Michigan Journal of Law Reform and the Michigan Journal of Gender & Law. Mr. LaPointe received a B.B.A. in Accounting & Information Systems and Political Science, *cum laude*, from the University of Massachusetts-Amherst in 2006. Mr. LaPointe focuses his practice on securities litigation.

CHRISTIE BUZZETTI- ATTORNEY

Ms. Buzzetti graduated from Brooklyn Law School in 2022. She received her B.A. in Political Science from the University of California, Los Angeles in 2016. Ms. Buzzetti is admitted to practice in New York.

MICHAEL COHEN - ATTORNEY

Mr. Cohen focuses his practice on securities and shareholder derivative litigation. Prior to joining The Rosen Law Firm in 2021, Mr. Cohen was an associate in the litigation practice of Kramer Levin Naftalis & Frankel LLP, where he advised corporate and individual clients on a wide variety of litigation and regulatory matters in federal and state courts. He has also served as a law clerk to the Honorable Corinne Beckwith of the District of Columbia Court of Appeals. Mr. Cohen is admitted to practice in New York and the United States District Courts for the Eastern and Southern Districts of New York. Mr. Cohen was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2024.

LUKE FOLEY –ATTORNEY

Mr. Foley received his J.D. from the William and Mary Law School in 2022. He received his B.A. in History and Citizenship & Civic Engagement from Syracuse University in 2016. Prior to joining the Rosen Law Firm in September 2023, Mr. Foley was the Law Clerk to the Hon. Barbara Buono Stanton of the New Jersey Superior Court, Passaic County. Mr. Foley is admitted to practice in Maryland.

RYAN HEDRICK –ATTORNEY

Mr. Hedrick received his J.D. from the University of Chicago in 2019. He received his B.A. in Linguistics and Political Science, *summa cum laude*, from The Ohio State University in 2015. Mr. Hedrick joined the Rosen Law Firm in August 2019. Mr. Hedrick is admitted to practice in New York, New Jersey, and the United States District Court for the District of New Jersey.

HA SUNG (SCOTT) KIM – ATTORNEY

Mr. Kim received his J.D. from the Columbia Law School in 2017. He received his B.A., *magna cum laude*, from Wheaton College in 2013. Mr. Kim joined the Rosen Law Firm in January 2020. Mr. Kim is admitted to practice in New York.

LEAH HEIFETZ-LI – ATTORNEY

Ms. Heifetz-Li is a 2009 graduate of Columbia Law School, and received a B.A. from the University of Pennsylvania. Ms. Heifetz-Li served as a Law Clerk to the Honorable Cynthia S. Kern, New York State Supreme Court, New York County. She has extensive experience in class action litigation, having previously practiced at a large class action firm representing shareholders in merger and acquisition litigation as well as shareholder derivative actions. Ms. Heifetz-Li has worked on case teams that secured significant financial recoveries for stockholders as well as corporate governance reforms in the Delaware Court of Chancery and other courts throughout the country.

IAN MCDOWELL- ATTORNEY

Mr. McDowell graduated *cum laude* from the University of Richmond School of Law in 2022. He received his B.A. from James Madison University in 2016. Mr. McDowell is admitted to practice in Maryland.

HENRY BLOXENHEIM- LAW CLERK

Mr. Bloxenheim graduated from Columbia Law School in 2023. Mr. Bloxenheim received his B.A. in Political Science, *summa cum laude*, from Brooklyn College. Mr. Bloxenheim's admission to the New York bar is pending.

II. RECENT ACCOMPLISHMENTS OF THE ROSEN LAW FIRM, P.A.

- **Alibaba Group Holding Ltd.**, (S.D.N.Y.). Rosen Lead Counsel. **\$250 million.**
- **Fiat Chrysler Automobiles**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$110 million.**
- **Infinity Q Diversified Alpha Fund**, (N.Y. Supreme). Rosen Co-Lead Counsel. **\$48 million**, pending court approval.
- **Silver Wheaton Corp.**, (C.D. Cal.). Rosen Lead Counsel. **\$41.5 million.**
- **Omega Healthcare Investors, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$30.75 million.**

- **Magnachip Semiconductor Corp.**, (N.D. Cal.). Rosen Co-Lead Counsel. **\$29.7 million.**
- **Och-Ziff Capital Management Group LLC**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$28.75 million.**
- **Walter Investment Management**, (S.D. Fla.). Rosen Co-Lead Counsel. **\$24 million.**
- **Galena Biopharma, Inc.**, (D. Or.). Rosen Co-Lead Counsel. **\$20.165 million.**
- **El Pollo Loco Holdings, Inc.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$20 million.**
- **Tibet Pharmaceuticals, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$14 million bankruptcy settlement. \$2.075 million** with auditor.
- **USA Technologies, Inc.**, (E.D. Pa.). Rosen Lead Counsel. **\$15.3 million.**
- **Zillow Group, Inc. Sec. Litig.**, (W.D. Wash.). Rosen Lead Counsel. **\$15 million.**
- **Silvercorp Metals, Inc.**, (S.D.N.Y.). Rosen Plaintiffs' Counsel. **\$14 million.**
- **Sandridge Energy, Inc.**, (W.D. Okla.). Rosen Co-Lead Counsel. **\$13.945 million.**
- **Blue Apron Holdings, Inc.**, (E.D.N.Y.). Rosen Co-Lead Counsel. **\$13.25 million.**
- **Canopy Growth Corporation**, (D.N.J.). Rosen Co-Lead Counsel. **\$13 million.**
- **SeaWorld Entertainment Inc. (Shareholder Derivative)** (Del. Ch.). Rosen Co-Lead Counsel. **\$12.5 million.**
- **The RealReal, Inc.**, (N.D. Cal.). Rosen Lead Counsel. **\$11 million.**
- **Prosper Marketplace, Inc.**, (Cal. Superior). Rosen Class Counsel. **\$10 million.**
- **PG&E Corp.**, (N.D. Cal.). Rosen Co-Lead Counsel. **\$10 million.**
- **Textainer Financial Servs. Corp.**, (Cal. Superior). Rosen Co-Lead Counsel. **\$10 million.**
- **Quest Energy Partners LP**, (W.D. Okla.). Rosen Lead Counsel. **\$10.1 million** all classes.
- **comScore, Inc. (Shareholder Derivative)**, Rosen Co-Lead Counsel. **\$10 million.**

- **Santander Consumer USA Holdings Inc.**, (N.D. Tex.). Rosen Co-Lead Counsel. **\$9.5 million.**
- **Uxin Limited**, (E.D.N.Y.). Rosen Lead Counsel. **\$9.5 million.**
- **Concordia International Corp.**, (S.D.N.Y.). Rosen Lead Counsel. **\$9.25 million.**
- **PPDAI Group Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$9 million.**
- **Puda Coal**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$8.7 million.**
- **RINO International Corporation**, (C.D. Cal.). Rosen Lead Counsel. **\$8,685,000.**
- **Acer Therapeutics, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$8.35 million.**
- **Montage Technology Group Limited**, (N.D. Cal.). Rosen Lead Counsel. **\$7.25 million.**
- **AgFeed Industries**, (M.D. Tenn.). Rosen Lead Counsel. **\$7 million.**
- **Sundial Growers, Inc.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$7 million.**
- **Akazoo S.A.**, (E.D.N.Y.). Rosen Co-Lead Counsel. **\$6.51 million.**
- **Global Brokerage, Inc. f/k/a FXCM, Inc. Sec. Litig.**, (S.D.N.Y.). Rosen Lead Counsel. **\$6.5 million.**
- **Aeterna Zentaris, Inc.**, (D. N.J.). Rosen Class Counsel. **\$6.5 million.**
- **Sunlands Technology Group**, (E.D.N.Y.). Rosen Lead Counsel. **\$6.2 million.**
- **Covia Holdings Corp.**, (N.D. Ohio). Rosen Lead Counsel. **\$6 million**, pending court approval.
- **FalconStor Software, Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$5 million.**
- **Jumia Technologies AG**, (S.D.N.Y.). Rosen Lead Counsel. **\$5 million.**
- **Momo, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$5 million.**
- **SOS Limited**, (D.N.J.). Rosen Co-Lead Counsel. **\$5 million.**
- **State Street**, (D. Mass.). Rosen Lead Counsel. **\$4.9 million.**

- **Altice USA Inc., (E.D.N.Y.). Rosen Lead Counsel. \$4.75 million.**
- **KIOR, Inc., (S.D. Tex.). Rosen Co-Lead Counsel. \$4.5 million.**
- **Entropin, Inc., (C.D. Cal.). Rosen Lead Counsel. \$4.5 million.**
- **Sonus Networks, Inc., (D. Mass). Rosen Co-Lead Counsel. \$4.5 million.**
- **Uni-Pixel, Inc., (S.D. Tex.). Rosen Co-Lead Counsel. \$4.5 million.**
- **China Expert Technology, Inc., (S.D.N.Y.). Rosen Lead Counsel. \$4.2 million.**
- **IDreamSky Technology Limited, (S.D.N.Y.). Rosen Co-Lead Counsel. \$4.15 million.**
- **Universal Travel Group, Inc., (D.N.J.). Rosen Lead Counsel. \$4.075 million.**
- **Allegiant Travel Co., (D. Nev.). Rosen Lead Counsel. \$4 million.**
- **Zynerba Pharms., Inc., (E.D. Pa.). Rosen Co-Lead Counsel. \$4 million.**
- **Liberty Oilfield Services, Inc., (D. Colo.). Rosen Lead Counsel. \$3.9 million.**
- **China Electric Motor, Inc., (C.D. Cal.). Rosen Lead Counsel. \$3,778,333.33.**
- **IsoRay, Inc., (E.D. Wash.). Rosen Co-Lead Counsel. \$3,537,500.**
- **Deer Consumer Products, Inc., (C.D. Cal.). Rosen Lead Counsel. \$3.55 million.**
- **SAExploration Holdings, Inc., (S.D. Tex.). \$3.55 million.**
- **L&L Energy, Inc., (S.D.N.Y.). Rosen Lead Counsel. \$3.5 million.**
- **Tarena International, Inc., N (E.D.N.Y.). Rosen Lead Counsel. \$3.5 million, pending Court approval.**
- **Catalyst Pharmaceutical Partners, Inc., (S.D. Fla.). Rosen Lead Counsel. \$3.5 million.**
- **Keyuan Petrochemicals, Inc. and Auditor, (S.D.N.Y.) & (D.N.J.). Rosen Lead Counsel. \$3.5 million.**
- **StockerYale, Inc., (D.N.H.). Rosen Lead Counsel. \$3.4 million.**

- **Industrial Enterprises of America, Inc.,** (S.D.N.Y.). Rosen Co-Lead Counsel. **\$3.4 million.**
- **Ampio Pharmaceuticals, Inc.,** (C.D. Cal.). Rosen Lead Counsel. **\$3.4 million.**
- **Textura Corporation,** (N.D. Ill.). Rosen Lead Counsel. **\$3.3 million.**
- **Roka Bioscience, Inc.,** (D.N.J.). Rosen Lead Counsel. **\$3.275 million.**
- **Intrusion, Inc.,** No. 21-cv-307-SDJ (E.D. Tex.). Rosen Lead Counsel. **\$3.25 million.**
- **Wedbush Morgan Securities, Inc.,** (Cal. Superior). Co-Lead Counsel. **\$3.2 million.**
- **New Oriental Education & Technology Group Inc.,** (D.N.J.). Rosen Co-Lead Counsel. **\$3.15 million.**
- **TierOne Corporation,** (D. Neb.). Rosen Lead Counsel. **\$3.1 million.**
- **Hanmi Financial Corporation,** (C.D. Cal.). Rosen Lead Counsel. **\$3 million,** pending court approval.
- **Cadiz, Inc.,** (C.D. Cal.). Rosen Co-Lead Counsel. **\$3 million.**
- **Fat Brands, Inc.,** (C.D. Cal.). Rosen Lead Counsel. **\$3 million.**
- **China Finance Online Co. Limited,** (S.D.N.Y.). Rosen Lead Counsel. **\$3 million.**
- **Skilled Healthcare Group, Inc.,** (C.D. Cal.). Rosen Co-Lead Counsel. **\$3 million.**
- **Spectrum Pharms. Inc.,** (D. Nev.). Rosen Lead Counsel. **\$2.995 million.**
- **MiMedx Group, Inc.,** (N.D. Ga.). Rosen Lead Counsel. **\$2.979 million.**
- **Pegasus Communications Corp,** (E.D. Pa.). Rosen Lead Counsel. **\$2.95 million.**
- **Albany Molecular Research,** (E.D.N.Y.). Rosen Lead Counsel. **\$2.868 million.**
- **Lihua International, Inc.,** (S.D.N.Y.). Rosen Lead Counsel. **\$2.865 million.**
- **TVIA, Inc.,** (N.D. Cal.). Rosen Lead Counsel. **\$2.85 million.**
- **New Source Energy Partners LP,** (S.D.N.Y.). Rosen Lead Counsel. **\$2.85 million.**

- **Innocoll Holdings Public Ltd., (E.D. Pa.).** Rosen Lead Counsel. **\$2.755 million.**
- **Natural Health Trends Corp., et al., (N.D. Tex.).** Rosen Lead Counsel. **\$2.75 million.**
- **Sequans Communications, (E.D.N.Y.).** Rosen Co-Lead Counsel. **\$2.75 million.**
- **Akari Therapeutics PLC, (S.D.N.Y.).** Rosen Lead Counsel. **\$2.7 million.**
- **Growlife, Inc., (C.D. Cal.).** Rosen Lead Counsel. **\$2.7 million (cash and stock).**
- **Tangoe, Inc., (D. Conn.).** Rosen Co-Lead Counsel. **\$2.55 million.**
- **Twitter, Inc., (Cal. Superior).** Rosen Co-Lead Counsel. **\$2.5 million.**
- **Radiant Pharmaceuticals Corporation, (C.D. Cal.).** Rosen Lead Counsel. **\$2.5 million.**
- **Robert T. Harvey Securities Litigation, (C.D. Cal.).** Rosen Co-Lead Counsel. **\$2.485 million.**
- **China Education Alliance, Inc., (C.D. Cal.).** Rosen Lead Counsel. **\$2.425 million.**
- **Oasmia Pharmaceuticals AB., (E.D.N.Y.).** Rosen Co-Lead Counsel. **\$2.35 million.**
- **BioAmber, Inc., (E.D.N.Y.).** Rosen Co-Lead Counsel. **\$2.25 million.**
- **NetApp, Inc., (N.D. Cal.).** Rosen Lead Counsel. **\$2.25 million.**
- **Akers Biosciences, Inc., (D.N.J.).** Rosen Lead Counsel. **\$2.25 million.**
- **Kanzhun Limited, (D.N.J.).** Rosen Lead Counsel. **\$2.25 million.**
- **SkyPeople Fruit Juice, (S.D.N.Y.).** Rosen Lead Counsel. **\$2.2 million.**
- **Caesarstone Sdot-Yam Ltd., (S.D.N.Y.).** Rosen Co-Lead Counsel. **\$2.2 million.**
- **RCI Hospitality Holdings Inc., (S.D. Tex.).** Rosen Co-Lead Counsel. **\$2.2 million.**
- **Fuwei Films, (S.D.N.Y.).** Rosen Lead Counsel. **\$2.15 million.**
- **Gulf Resources, Inc., (C.D. Cal.).** Rosen Lead Counsel. **\$2.125 million.**
- **PTC Inc., (D. Mass.).** Rosen Lead Counsel. **\$2.1 million.**
- **DS Healthcare Group, Inc., (S.D. Fla.).** Rosen Lead Counsel. **\$2.1 million.**

- **Indivior PLC**, (D.N.J.). Rosen Lead Counsel. **\$2 million.**
- **Orient Paper, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$2 million.**
- **Mesoblast Limited**, (S.D.N.Y.). Rosen Lead Counsel. **\$2 million.**
- **GTT Communications, Inc.**, No. 21-CV-270-DOC-AS (C.D. Cal.). **\$2 million.**
- **iBio, Inc.**, (D. Del.). Rosen Lead Counsel. **\$1.875 million.**
- **CD Projekt SA**, No. CV-20-11627 (FMO)(RAOx) (C.D. Cal.). **\$1.85 million.**
- **Ignite Restaurant Group, Inc.**, (S.D. Tex.). Rosen Lead Counsel. **\$1.8 million.**
- **Electronic Game Card, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$1.755 million.**
- **BMW AG**, (D.N.J.). Rosen Lead Counsel. **\$1.75 million.**
- **Natural Health Trends Corp.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$1.75 million.**
- **Corrrevio Pharma Corp.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.75 million.**
- **Delstaff LLC (Merger Litigation)**, (Cal. Superior). **\$1.6425 million.**
- **Worldwide Energy & Manufacturing USA, Inc.**, (Cal. Superior). Rosen Lead Counsel. **\$1.615 million.**
- **Alliance MMA, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$1.55 million.**
- **Lightinthebox Holding Co., Ltd.**, (S.D.N.Y.). Rosen Lead Counsel. **\$1.55 million.**
- **Nutracea, Inc.**, (D. Ariz.). Rosen Lead Counsel. **\$1.5 million.**
- **Kraton Corporation**, (S.D. Tex.). Rosen Lead Counsel. **\$1.5 million.**
- **RMG Networks Holding Corporation (Merger Litigation)**, (Del. Ch.). **\$1.5 million.**
- **BlueNRGY Group Ltd, f/k/a CBD Energy Ltd.**, (S.D. Tex.). Rosen Lead Counsel. **\$1.5 million.**
- **Ambow Education Holding Ltd.**, (C.D. Cal.). Rosen Lead Counsel. **\$1.5 million.**
- **Active Power, Inc.**, (W.D. Tex.). Rosen Lead Counsel. **\$1.5 million.**

- **Northfield Laboratories, Inc.**, (N.D. Ill.). Rosen Lead Counsel. **\$1.5 million.**
- **PartsBase.com, Inc.**, (S.D. Fla.). Rosen Lead Counsel. **\$1.5 million.**
- **China Natural Gas, Inc.**, (D. Del.). Rosen Lead Counsel. **\$1.5 million.**
- **FAB Universal Corp.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.5 million.**
- **Sogou, Inc.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.45 million.**
- **Code Rebel Corp.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.415 million.**
- **Empyrean Bioscience**, (N.D. Ga.). Rosen Lead Counsel. **\$1.4 million.**
- **Shattuck Labs, Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$1.4 million.**
- **Longeveron, Inc.**, (S.D. Fla.). Rosen Lead Counsel. **\$1.395 million.**
- **Agria, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$1.3 million.**
- **Aterian, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$1.3 million.**
- **CoCrystal Pharma, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$1.265 million.**
- **Wins Financial Holdings, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$1.26 million**, pending Court approval.
- **ERBA Diagnostics, Inc.**, (S.D. Fla.). Rosen Lead Counsel. **\$1.215 million.**
- **Yingli Green Energy Holding Co. Ltd.**, (C.D. Cal.). Rosen Lead Counsel. **\$1.2 million.**
- **Himax Technologies, Inc.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$1.2 million.**
- **Flight Safety Technologies, Inc.**, (D. Conn.). Rosen Lead Counsel. **\$1.2 million.**
- **M.H. Meyerson & Co.**, (D.N.J.). Rosen Lead Counsel. **\$1.2 million.**
- **Izea, Inc.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$1.2 million.**
- **India Globalization Capital, Inc.**, (D. Md.). Rosen Co-Lead Counsel. **\$1 million.**
- **National Lampoon, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$1 million.**
- **Lentuo International, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$1 million.**

- **Katanga Mining Limited**, (D.N.J.). Rosen Lead Counsel. **\$1 million.**
- **Busybox.com, Inc.**, (Cal. Superior). Rosen Co-Lead Counsel. **\$1 million.**

III. SECURITIES CLASS ACTIONS IN WHICH THE ROSEN LAW FIRM, P.A. IS CURRENTLY LEAD COUNSEL

In re Maiden Holdings, Ltd. Securities Litigation, No. 19-CV-5296-RMB-JS (D.N.J.)

Rosen Co-Lead Counsel.

Acerra v. Trulieve Cannabis Corp., No. 20-cv-186-RH-MJF (N.D. Fla.). Rosen Lead Counsel.

In re ChinaCast Education Corporation Sec. Litig., No. CV 12-4621- JFW (PLAx) (C.D. Cal.). Rosen Co-Lead Counsel.

Kasillingam v. Tilray, Inc., No. 20-CV-3459 (PAC) (S.D.N.Y.). Rosen Lead Counsel.

In re NIO, Inc. Securities Litigation, No. 19-CV-1424 (NGG) (JRC) (E.D.N.Y.). Rosen Class Counsel.

City of Taylor General Employees Retirement System v. Astec Industries, Inc., No. 1:19-cv-PLR-CHS. (E.D. Tenn.). Rosen Lead Counsel.

Lee v. IQIYI, Inc., No. 20-cv-1830 (LDH)(JO) (E.D.N.Y.). Rosen Co-Lead Counsel.

Alagappan v. Baidu, Inc., No. 20-cv-3794 (DG)(TAM) (E.D.N.Y.). Rosen Co-Lead Counsel.

Lavin v. Virgin Galactic Holdings Inc., No. 21-CV-3070 (ARR)(TAM) (E.D.N.Y.). Rosen Lead Counsel.

Handal v. Tenet Fintech Group, Inc., No. 21-cv-6461 (PKC)(RLM) (E.D.N.Y.). Rosen Lead Counsel.

Baker v. Twitter, Inc., No. 22-cv-6525-MCS (C.D. Cal.). Rosen Lead Counsel.

Atery v. Astra Space, Inc., No. 22-cv-737 (NM)(MMH) (E.D.N.Y.). Rosen Co-Lead Counsel.

Hoang v. ContextLogic, Inc., No. 21-cv-3930-BLF (N.D. Cal.). Rosen Co-Lead Counsel.

Mallozzi v. Innovative Industrial Properties, Inc., No. 22-cv-2359-EP-JRA (D.N.J.).
Rosen Lead Counsel.

Gru v. Axsome Therapeutics, Inc., No. 22-cv-3925 (AGS) (S.D.N.Y.). Rosen Co-Lead Counsel.

Pratyush v. Full Truck Alliance Co., No. 21-cv-3903 (LDH)(MMH) (E.D.N.Y.). Rosen
Lead Counsel.

Farhar v. Ontrak, Inc., No. 21-CV-1987-FLA-A (C.D. Cal.). Rosen Lead Counsel.

Cao v. Uber Technologies, Inc., No. 22-cv-4688-YGR (N.D. Cal.). Rosen Lead Counsel.

Chen v. Missfresh Limited, No. 22-CV-4065 (WFK)(VMS) (E.D.N.Y.). Rosen Co-Lead
Counsel.

In re Vanguard Chester Funds Litig., No. 22-cv-955-ER (E.D. Pa.). Rosen Lead Counsel.

In re Walmart Secs. Litig., No. 21-cv-55-CFC (D. Del.). Rosen Lead Counsel.

Sanchez v. Arrival SA, No. 220cv0172 (DG)(RLM) (E.D.N.Y.). Rosen Lead Counsel.

In re Evolus Inc., Sec. Litig., No. 20-cv-8647 (PGG) (S.D.N.Y.). Rosen Lead Counsel.

Winter v. Stronghold Digital Mining, Inc., No. 22-CV-3088 (RA). Rosen Co-Lead
Counsel.

In re January 2021 Short Squeeze Trading Litig., 21-2989-MDL (S.D. Fla.). Rosen Lead
Counsel.

In re VEON Ltd. Sec. Litig., No. 15-cv-8672 (ALC)(OTW) (S.D.N.Y.). Rosen Lead
Counsel.

Hacker v. Electric Last Mile Solutions, No. 22-CV-545-CCC (D.N.J.). Rosen Lead Counsel.

In re Volkswagen AG Sec. Litig., No. 22-cv-45-RDA-TCB (E.D. Va.). Rosen Lead Counsel.

Friel v. Dapper Labs, Inc., No. 21-CV-5837 (VM) (S.D.N.Y.). Rosen Lead Counsel.

In re DiDi Global Inc. Sec. Litig., No. 21-CV-5807 (LAK) (S.D.N.Y.). Rosen Lead Counsel.

Patterson v. TerraForm Labs Pte Ltd., No. 22-cv-3600-TLT (N.D. Cal.). Rosen Lead Counsel.

Diaz v. The Gap, Inc., No. 22-cv-7371 (DG)(RER) (E.D.N.Y.). Rosen Lead Counsel.

Freudiger v. Molecular Partners AG, No. 22-CV-5925 (ER) (S.D.N.Y.). Rosen Lead Counsel.

Armbruster v. Gaia, Inc., No. 22-CV-3267 (D. Colo.). Rosen Lead Counsel.

Pang v. Levitt (Core Scientific, Inc.), No. 22-CV-1191-LY (W.D. Tex.). Rosen Lead Counsel.

Fung v. Sunlight Financial Holdings, Inc., No. 22-CV-10658 (AKH) (S.D.N.Y.). Rosen Lead Counsel.

Goodman v. Wheels Up Experience, Inc., No. 23-cv-2900 (OEM)(VMS) (E.D.N.Y.). Rosen Lead Counsel.

Brennan v. Latch, Inc., No. 22-CV-7473 (JGK) (S.D.N.Y.). Rosen Lead Counsel.

Weir v. Allianz SE, No. 23-cv-719-DSF-MAA (C.D. Cal.). Rosen Lead Counsel.

In re Enovix Corp. Sec. Litig., No. 23-cv-71-SI (N.D. Cal.). Rosen Co-Lead Counsel.

Gambrill v. CS Disco, Inc., No. 23-cv-8270 (LAK)(SN) (S.D.N.Y.). Rosen Lead Counsel.

Lewandowski v. Tal Education Group, No. 23-cv-1769 (MEF) (JRA) (D.N.J.). Rosen Lead Counsel.

Bergmann v. GDS Holdings Limited, CV-23-4900 (JAK)(BFMx) (C.D. Cal.). Rosen Lead Counsel.

HRSA-ILA Funds v. adidas AG, No. 23-CV-629-IM (D. Or.). Rosen Lead Counsel.

Zhao v. Eqonex Limited, No. 23-CV-3346 (GHW) (S.D.N.Y.). Rosen Lead Counsel.

Tan v. PacWest Bancorp., No. CV-23-1685 (JWH)(ADSx) (C.D. Cal.). Rosen Co-Lead Counsel.

Maschhoff v. Polished.com, No. 22-cv-6605 (NGG)(VMS) (E.D.N.Y.). Rosen Lead Counsel.

Bergman v. Caribou Biosciences, Inc., No. 23-cv-1742 (N.D. Cal.). Rosen Co-Lead Counsel.

Donley v. Live Nation Entertainment, Inc., No. CV-23-6343 (KK)(ASx) (C.D. Cal.). Rosen Co-Lead Counsel.

Pelham v. VBIT Tech. Corp., No. 23-CV-162-CFC-SRF (D. Del.). Rosen Lead Counsel.

Fernandez v. DouYu International Holdings Ltd., No. 23-cv-3161-EP-ESK. (D.N.J.). Rosen Co-Lead Counsel.

Sporn v. Brainstorm Cell Therapeutics, Inc., No. 23-cv-9630 (DEH) (S.D.N.Y.) Rosen Lead Counsel.

In re GigaCloud Tech. Sec. Litig., No. 23-cv-10645 (JMF) (S.D.N.Y.). Rosen Co-Lead Counsel.

EXHIBIT 8

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**DECLARATION OF DARYL ANDREWS, ESQ. IN SUPPORT OF LEAD COUNSEL'S
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES FILED ON BEHALF OF ANDREWS DEVALERIO LLP**

I, Daryl Andrews, declare as follows:

1. I am a partner at Andrews DeValerio LLP (“Andrews DeValerio”), the Court-appointed liaison counsel in the above-captioned action (the “Action”).¹ See ECF No. 41. I submit this declaration in support of Lead Counsel’s application for an award of attorneys’ fees in connection with services rendered in the Action, as well as for reimbursement of litigation expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein based on my active supervision of, and participation in, the prosecution and settlement of the claims asserted in the Action and, if called upon, could and would testify thereto.

2. As Liaison Counsel for Plaintiffs in this Action, Andrews DeValerio, among other things: (a) reviewed and filed the initial complaint; and (b) reviewed, analyzed and edited briefing related to, and attended hearings on, the lead plaintiff appointment motions, the motion to dismiss, and scheduling conferences, and the motion for preliminary approval of the proposed settlement.

3. The schedule attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by attorneys and the lodestar calculation for those individuals based on my firm’s current billing rates. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm.

4. I am the partner who oversaw or conducted the day-to-day activities in the Action and I reviewed these daily time records in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the records as well as the necessity for, and reasonableness of, the time committed to the litigation. As a result of this review, I made reductions to certain of my firm’s time entries such that the time included in Exhibit A reflect that

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated July 21, 2023. ECF No. 122-1.

exercise of billing judgment. Based on this review and the adjustments made, I believe that the time of Andrews DeValerio attorneys and staff reflected in Exhibit A was reasonable and necessary for the effective and efficient prosecution and resolution of the Action. No time expended on the application for fees and reimbursement of expenses has been included.

5. The hourly rates for the attorneys in my firm included in Exhibit A are consistent with the rates approved by courts in other securities or shareholder litigation when conducting a lodestar cross-check.

6. The total number of hours reflected in Exhibit A is 106.3 hours. The total lodestar reflected in Exhibit A is \$73,175.00.

7. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

8. As detailed in Exhibit B, my firm is seeking reimbursement of a total of \$71.20 in expenses incurred in connection with the prosecution of this Action.

9. The litigation expenses incurred in the Action 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. The expenses reflected in Exhibit B are the expenses actually incurred by my firm.

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on March 13, 2024.

/s/ Daryl Andrews

Daryl Andrews

EXHIBIT A

Miller v. Sonus Networks, Inc. et al.,
Case No.: 1:18-cv-12344-GAO

Andrews DeValerio LLP

**LODESTAR REPORT
 FROM INCEPTION THROUGH MARCH 13, 2024**

TIMEKEEPER/CASE	STATUS	HOURS	RATE	LODESTAR
ATTORNEYS:				
Glen DeValerio	Partner	40.8	\$750	\$30,600.00
Daryl Andrews	Partner	65.5	\$650	\$42,575.00
TOTAL LODESTAR		106.3		\$73,175.00

EXHIBIT B

Miller v. Sonus Networks, Inc. et al.,
Case No.: 1:18-cv-12344-GAO

Andrews DeValerio LLP

EXPENSE REPORT

FROM INCEPTION THROUGH MARCH 13, 2024

ITEM	AMOUNT
ONLINE RESEARCH	\$34.20
AUTOMOTIVE TRANSPORTATION	\$37.00
GRAND TOTAL	\$71.20

EXHIBIT C
Andrews DeValerio LLP
FIRM RESUME

EXHIBIT 9

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**DECLARATION OF JACOB A. GOLDBERG, ESQ. IN SUPPORT
OF LEAD COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION
EXPENSES FILED ON BEHALF OF THE ROSEN LAW FIRM, P.A.**

I, Jacob A. Goldberg, declare as follows:

1. I am a partner at The Rosen Law Firm, P.A. (“Rosen”), one of the Lead Counsel in the above-captioned action (“Action”).¹ *ee* ECF No. 41. I submit this declaration in support of Lead Counsel’s application for an award of attorneys’ fees in connection with services rendered in the Action, as well as for reimbursement of litigation expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein based on my active supervision of, and participation in, the prosecution and settlement of the claims asserted in the Action and, if called upon, could and would testify thereto.

2. Rosen, as co-Lead Counsel, was involved in all aspects of the Action and its settlement, as set forth in the Joint Declaration of Garth A. Spencer and Jacob A. Goldberg in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees, Reimbursement of Litigation Expenses, and Awards to Plaintiffs (“Joint Declaration”).

3. Table A below is a detailed summary indicating the amount of time spent by attorneys and professional support staff employees of my firm through and including March 1, 2024, and the lodestar calculation for those individuals based on my firm’s current billing rates. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such personnel in his or her final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm.

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated July 21, 2023. ECF No. 122-1.

4. I am the partner who oversaw or conducted the day-to-day activities in the Action and I reviewed these daily time records in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the records as well as the necessity for, and reasonableness of, the time committed to the litigation. As a result of this review, I made reductions to certain of my firm's time entries such that the time included in Table A reflect that exercise of billing judgment. Based on this review and the adjustments made, I believe that the time of Rosen attorneys and staff reflected in Table A was reasonable and necessary for the effective and efficient prosecution and resolution of the Action. No time expended on the application for fees and reimbursement of expenses has been included.

5. The hourly rates for the attorneys and professional support staff in my firm included in Table A above are consistent with the rates approved by courts in other securities or shareholder litigation when conducting a lodestar cross-check.

Table A details that the total number of hours worked by Rosen personnel is 1,159.7 hours. The total lodestar reflected in the table is \$1,140,380 for attorneys' time:

**TABLE A- The Rosen La Firm, P.A.
LODESTAR REPORT FROM INCEPTION THROUGH MARCH ,**

TIMEKEEPER CASE	STATUS	HOURS	RATE	LODESTAR
ATTORNEYS				
Jacob A. Goldberg	Partner	385.3	\$1,150	\$443,095
Phil Kim	Partner	1.3	\$1,150	\$1,495
Gonen Haklay	Counsel	773.1	\$900	\$695,790
Debra S. Goodman	Contract Attorney	455.3	\$500	\$227,650
TOTAL LODESTAR		1,615		\$1,368,030

7. My firm's lodestar figures do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

EXHIBIT 10

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**DECLARATION OF GARTH A. SPENCER, ESQ. IN SUPPORT OF LEAD
COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION EXPENSES FILED ON BEHALF OF
GLANCY PRONGAY & MURRAY LLP**

I, Garth A. Spencer, declare as follows:

1. I am a partner at the law firm Glancy Prongay & Murray LLP (“GPM”).¹ GPM is one of the Court-appointed Lead Counsel in the above-captioned action (the “Action”). *See* ECF No. 41. I submit this declaration in support of Lead Counsel’s application for an award of attorneys’ fees in connection with services rendered in the Action, as well as for reimbursement of litigation expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. GPM, as Lead Counsel, was involved in all aspects of the Action and its settlement, as set forth in the Declaration of Garth A. Spencer and Jacob A. Goldberg and in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses.

3. The schedule attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by attorneys and professional support staff of my firm who, from inception of the Action through and including March 13, 2024, billed ten or more hours to the Action, and the lodestar calculation for those individuals based on my firm’s current billing rates. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such personnel in their final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm.

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated July 21, 2023. ECF No. 122-1.

4. I am the partner who oversaw or conducted the day-to-day activities in the Action and I reviewed these daily time records in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the records as well as the necessity for, and reasonableness of, the time committed to the litigation. As a result of this review, I made reductions to certain of my firm's time entries such that the time included in Exhibit A reflects that exercise of billing judgment. Based on this review and the adjustments made, I believe that the time of the GPM attorneys and staff reflected in Exhibit A was reasonable and necessary for the effective and efficient prosecution and resolution of the Action. No time expended on the application for fees and reimbursement of expenses has been included.

5. The hourly rates for the attorneys and professional support staff in my firm included in Exhibit A are consistent with the rates approved by courts in other securities or shareholder litigation when conducting a lodestar cross-check.

6. The total number of hours reflected in Exhibit A is 776.05 hours. The total lodestar reflected in Exhibit A is \$611,961.75, consisting of \$589,613.75 for attorneys' time and \$22,348.00 for professional support staff time.

7. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates .

8. As detailed in Exhibit B, my firm is seeking reimbursement of a total of \$46,763.46 in expenses incurred in connection with the prosecution of this Action.

9. The litigation expenses incurred in the Action 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. The expenses reflected in Exhibit B are the expenses actually incurred by my firm.

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on March 13, 2024, in Wilmington, North Carolina.

/s/ Garth A. Spencer

Garth A. Spencer

EXHIBIT A

Miller v. Sonus Networks, Inc. et al.,
Case No.: 1:18-cv-12344-GAO

Glancy Prongay & Murray LLP

**LODESTAR REPORT
FROM INCEPTION THROUGH MARCH 13, 2024**

TIMEKEEPER/CASE	STATUS	HOURS	RATE	LODESTAR
ATTORNEYS:				
Robert Prongay	Partner	11.20	1,050.00	11,760.00
Joseph Cohen	Partner	69.25	1,195.00	82,753.75
Garth Spencer	Partner	433.30	925.00	400,802.50
Charles Linehan	Partner	24.20	895.00	21,659.00
Pavithra Rajesh	Senior Counsel	12.70	625.00	7,937.50
Peter Rabinov	Staff Attorney	163.80	395.00	64,701.00
TOTAL ATTORNEY	TOTAL	714.45		589,613.75
PROFESSIONAL STAFF:				
Harry Kharadjian	Senior Paralegal	18.75	350.00	6,562.50
Paul Harrigan	Senior Paralegal	10.50	325.00	3,412.50
John D. Belanger	Research Analyst	16.20	365.00	5,913.00
Michaela Ligman	Research Analyst	16.15	400.00	6,460.00
TOTAL PROFESSIONAL STAFF	TOTAL	61.60		22,348.00
TOTAL LODESTAR	TOTAL	776.05		611,961.75

EXHIBIT B

Miller v. Sonus Networks, Inc. et al.,
Case No.: 1:18-cv-12344-GAO

Glancy Prongay & Murray LLP

EXPENSE REPORT

FROM INCEPTION THROUGH MARCH 13, 2024

CATEGORY OF EXPENSE	AMOUNT PAID
COURT FILING FEES	525.00
E-DISCOVERY VENDOR CHARGES	3,112.50
EXPERTS - ECONOMETRIC (MARKET EFFICIENCY, DAMAGES, PLAN OF ALLOCATION)	19,502.50
MEDIATORS	7,309.06
ONLINE RESEARCH	5,314.85
PSLRA-MANDATED PRESS RELEASE	130.00
PRIVATE INVESTIGATOR FEES	100.00
SERVICE OF PROCESS	887.62
TRANSCRIPTS	3,473.83
TRAVEL AIRFARE*	2,705.50
TRAVEL AMTRAK	694.00
TRAVEL AUTO	675.42
TRAVEL HOTEL*	2,209.96
TRAVEL MEALS	123.22
Grand Total	46,763.46

*Includes airfare and hotel for final approval hearing.

EXHIBIT 11



RECENT TRENDS IN SECURITIES CLASS ACTION LITIGATION: 2023 FULL-YEAR REVIEW

By Edward Flores and Svetlana Starykh¹

23 January 2024

FOREWORD

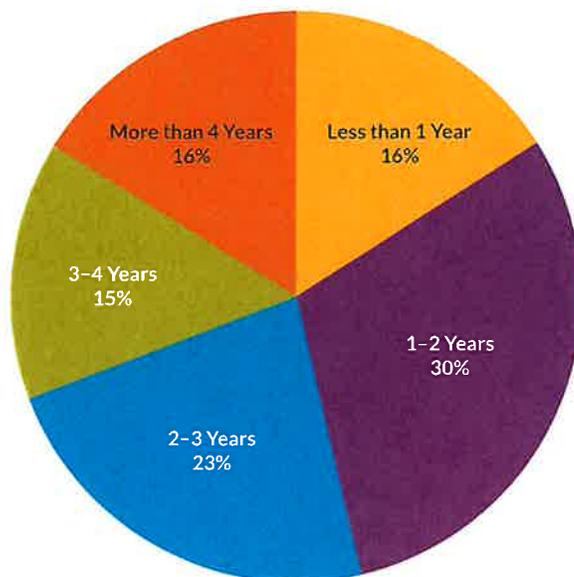
I am excited to share NERA's "Recent Trends in Securities Class Action Litigation: 2023 Full-Year Review" with you. This year's edition builds on work carried out over more than three decades by many of NERA's securities and finance experts. Although space does not permit us to present all the analyses the authors have undertaken while working on this year's edition or to provide details on the statistical analysis of settlement amounts, we hope you will contact us if you want to learn more about our research or our work in securities litigations. On behalf of NERA's securities and finance experts, I thank you for taking the time to review this year's report and hope you find it informative.

DAVID TABAK, PhD

Senior Managing Director



Figure 13. Time from First Complaint Filing to Resolution
 Excluding Merger Objections and Crypto Unregistered Securities
 Cases Filed January 2004–December 2019 and Resolved January 2004–December 2023



ANALYSIS OF MOTIONS

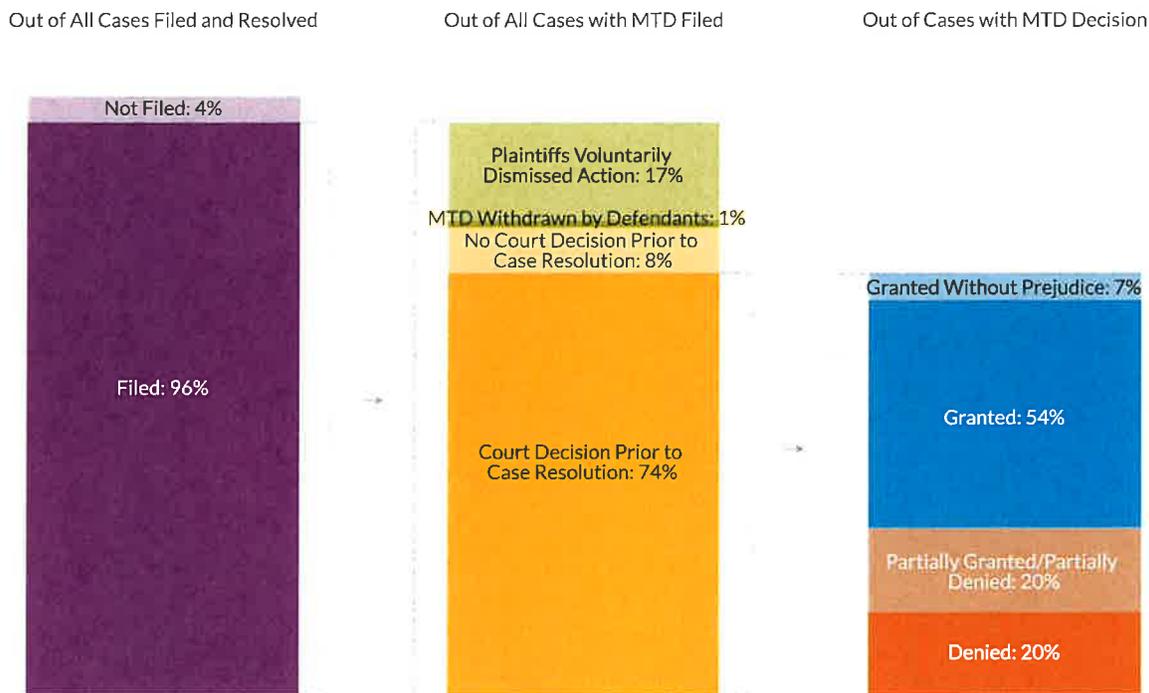
NERA's federal securities class action database tracks filing and resolution activity as well as decisions on motions to dismiss, motions for class certification, and the status of any motion as of the resolution date. For this analysis, we include securities class actions that were filed and resolved over the 2014–2023 period in which purchasers of common stock are part of the class and in which a violation of Rule 10b-5, Section 11, and/or Section 12 is alleged.

Motion to Dismiss

A motion to dismiss was filed in 96% of the securities class action suits filed and resolved. A decision was reached in 74% of these cases, while 17% were voluntarily dismissed by plaintiffs, 8% settled before a court decision was reached, and 1% of motions were withdrawn by defendants. Among the cases in which a decision was reached, 60% of motions were granted (with or without prejudice) while 40% were denied either in part or in full. See Figure 14.



Figure 14. Filing and Resolutions of Motions to Dismiss
 Cases Filed and Resolved January 2014–December 2023

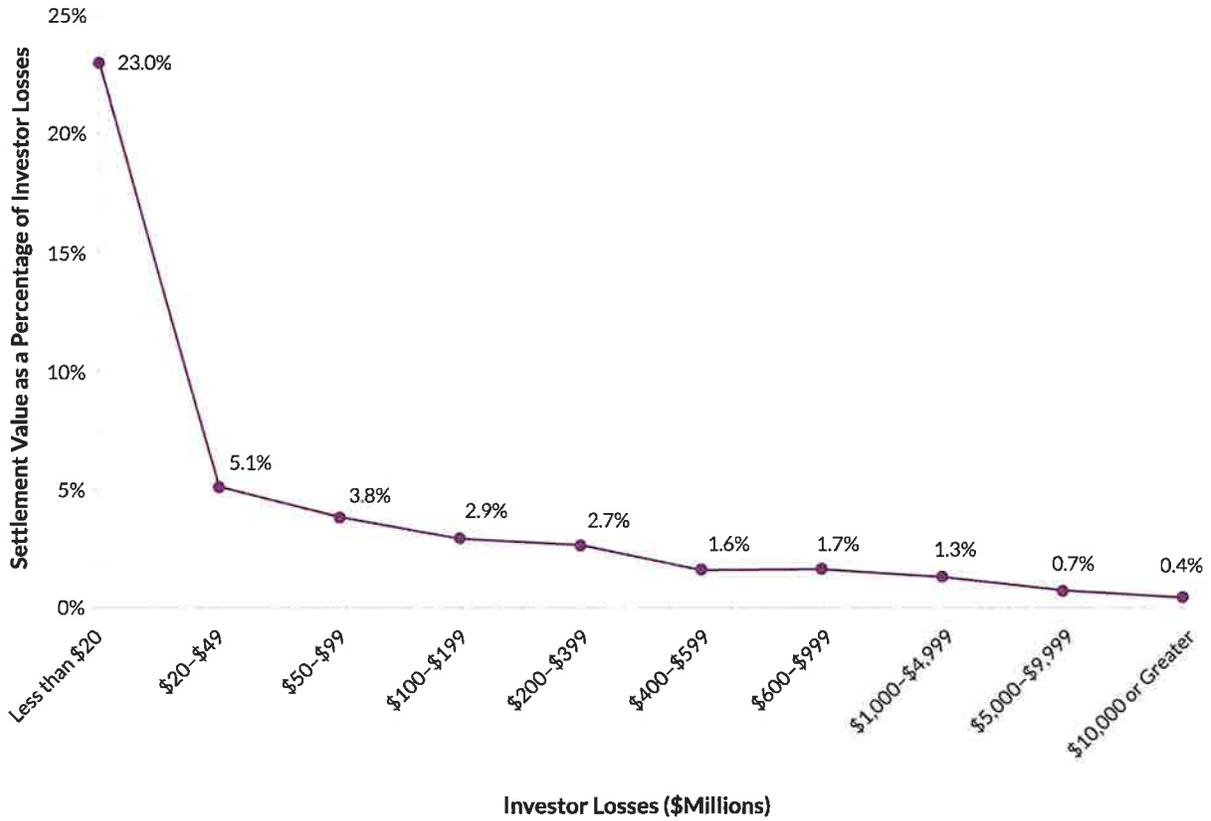


Motion for Class Certification

A motion for class certification was filed in only 18% of the securities class action suits filed and resolved, as most cases are either dismissed or settled before the class certification stage is reached. A decision was reached in 60% of the cases in which a motion for class certification was filed, while nearly all remaining 40% of cases were resolved with a settlement. Among the cases in which a decision was reached, the motion for class certification was granted (with or without prejudice) in 86% of cases. See Figure 15.

Approximately 64% of decisions on motions for class certification occur within three years of the filing of the first complaint, with nearly all decisions occurring within five years (see Figure 16). The median time is about 2.7 years.

Figure 21. Median Settlement Value as a Percentage of NERA-Defined Investor Losses
 By Level of Investor Losses
 Cases Settled January 2014–December 2023



The median Investor Losses were \$923 million, a 6% decline relative to 2022 and the second highest recorded value during the 2014–2023 period.



RELATED EXPERTS



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The opinions expressed herein do not necessarily represent the views of NERA or any other NERA consultant.

ABOUT NERA

Since 1961, NERA has provided unparalleled guidance on the most important market, legal, and regulatory questions of the day. Our work has shaped industries and policy around the world. Our field-leading experts and deep experience allows us to provide rigorous analysis, reliable expert testimony, and data-powered policy recommendations for the world's leading law firms and corporations as well as regulators and governments. Our experience, integrity, and economic ingenuity mean you can depend on us in the face of your biggest economic and financial challenges.



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EXHIBIT 12

Dahl v. Bain Capital Partners LLC, No. 07-cv-12388, ECF No. 1052, 1121 (D. Mass. Feb. 23, 2015)	\$590,500,000	33.00%
In re Loestrin 24 Fe Antitrust Litigation, No. 13-md-02472, 2020 WL 4035125, at *6 (D.R.I. July 17, 2020), report and recommendation adopted, 2020 WL 5203323, at *6 (D.R.I. Sept. 1, 2020)	\$120,000,000	33.33%
In re Prograf Antitrust Litigation, No. 11-md-02242, 2015 WL 13908415, at *4 (D. Mass. May 20, 2015)	\$98,000,000	33.33%
In re Solodyn Antitrust Litig., No. 14-md-02503, 2018 WL 7075881, at *2 (D. Mass. July 18, 2018)	\$72,500,000	33.33%
In re Relafen Antitrust Litig., No. 01-cv-12239, 231 F.R.D. 52, 82 (D. Mass. Sept. 28, 2005)	\$67,000,000	33.33%
Natchitoché Par. Hospital Serv. Dist. v. Tyco Int'l, Ltd., 05-cv-12024, 2010 WL 11693979, at *4 (D. Mass. March 12, 2010)	\$32,500,000	33.33%
Gordan v. Massachusetts Mutual Life Insurance Co., No. 13-cv-30184, 2016 WL 11272044, at *3 (D. Mass. Nov. 6, 2016)	\$30,900,000	33.33%
Matamoros et al. v. Starbucks Corporation, Case No. 12-1189, ECF No. 169 (D. Mass. Aug 16, 2023)	\$23,500,000	33.33%
Ford v. Takeda Pharmaceuticals U.S.A., Inc., No. 21-cv-10090, 2023 WL 3679031, at *3 (D. Mass. March 31, 2023)	\$22,000,000	33.33%
Machado v. Endurance International Group Holdings, Inc. et al. No. 15-cv-11775, 2019 WL 4409217 at *1 (D.Mass. Sept. 13, 2019)	\$18,650,000	33.33%
Laurenzano v. BlueCross, No. 99-cv-11751, ECF No. 75 (D. Mass June 6, 2003)	\$16,000,000	33.33%
Dahhan v. OvaScience, Inc., No. 17-cv-10511, ECF No. 210 (D. Mass. Dec. 20, 2022)	\$15,000,000	33.33%
In re Asacol Antitrust Litig., No. 15-cv-12730, 2017 WL 11475275, at *4 (D. Mass. Dec. 7, 2017)	\$15,000,000	33.33%
In re Allaire Corp. Sec. Litig., No. 00-cv-11972, ECF No. 124 (D. Mass. Dec. 1, 2003)	\$12,026,000	33.33%
Bilewicz v. FMR LLC, No. 13-cv-10636, 2014 WL 8332137, at *6 (D. Mass. Oct. 16, 2014)	\$12,000,000	33.30%
Lapan v. Dick's Sporting Goods, Inc., No. 13-cv-11390, ECF No. 220 (D. Mass. April 19, 2016)	\$10,000,000	33.33%
In re Biopure Corp. Sec. Litig., No. 03-cv-12628, ECF No. 180 (D. Mass. Sept. 24, 2007)	\$10,000,000	33.00%
In re: Summit Tech. Sec. Litig., No. 96-cv-11589, ECF No. 648 (D. Mass. Apr. 25, 2001)	\$10,000,000	33.00%
Hildenbrand v. W Holding Company Inc., No. 07-cv-01886, ECF No. 471 (D.P.R., June 10, 2013)	\$8,750,000	30.00%
Ahearn v. Credit Suisse First Boston LLC, No. 03-10956, ECF No. 82 (D. Mass. June 7, 2006)	\$8,000,000	33.00%
Stein v. Smith, No. 01-cv-10500, ECF No. 146 (D. Mass. Oct. 18, 2005)	\$8,000,000	33.00%
In re: Copley Pharm., Inc. Sec. Litig., No. 94-cv-11897, ECF No. 111 (D. Mass. Feb. 8, 1996)	\$6,300,000	33.00%
In re Nx Networks Sec. Litig., No. 00-cv-11850, ECF No. 85 (D. Mass. Nov. 22, 2004)	\$6,300,000	33.33%
Zeid v. Open Env't Corp., No. 96-cv-12466, ECF No. 75 (D. Mass. June 24, 1999)	\$6,000,000	33.33%
In re Polymedica Corp. Sec. Litig., No. 00-cv-12426, ECF No. 167 (D. Mass. Sept. 5, 2007)	\$5,500,000	33.00%
Chalverus v. Pegasystems, Inc., No. 97-cv-12570, ECF No. 51 (D. Mass. Dec. 19, 2000)	\$5,250,000	33.00%
Wilensky v. Digital Equip. Corp., No. 94-10752, ECF No. 108 (D. Mass. July 11, 2001)	\$5,200,000	33.00%
Abato v. Marcam Corp., No. 94-cv-11625, ECF No. 51 (D. Mass. Dec. 4, 2007)	\$5,175,000	33.00%
Roberts v. TJX Companies, Inc., No. 13-cv-13142, 2016 WL 8677312 (D. Mass. Sept. 30, 2016)	\$4,750,000	33.00%
Esposito v. American Renal Associates Holdings, Inc. et al. No. 16-cv-11797, ECF No. 106 (D.Mass. June 15, 2018)	\$4,000,000	33.00%
In re Moduslink Global Sols. Inc. Sec. Litig., Inc. et al No. 12-cv-11044, ECF No. 72 (D.Mass. Mar. 13, 2015)	\$4,000,000	33.33%
In re Lernout & Hauspie Speech Products, N.V. Sec. Litig., No. 99-cv-10237, ECF No. 144 (D. Mass. Mar. 30, 2009)	\$3,950,000	33.00%
In re StockerYale, Inc. Sec. Litig., No. 05-cv-00177, 2007 WL 4589772, at *6 (D.N.H. Dec. 18, 2007)	\$3,400,000	33.00%
In re PHC, Inc. Shareholder Litig., Case No. 11-cv-11049, ECF No. 487 (D. Mass Apr. 2, 2019)	\$3,091,181	33.33%
Swack v. Credit Suisse First Boston LLC, No. 02-cv-11943, ECF No. 114 (D. Mass. June 26, 2006)	\$3,000,000	33.00%
In re: Number Nine Visual Tech. Corp. Sec. Litig., No. 96-cv-11207, ECF No. 101 (D. Mass. Feb. 6, 2001)	\$3,000,000	33.00%
In re: Network Engines, Inc. Sec. Litig., No. 03-cv-12529, ECF No. 84 (D. Mass. July 25, 2006)	\$2,875,000	33.33%
In re: Peritus Software Svc., Inc. Sec. Litig., No. 98-cv-10578, ECF No. 68 (D. Mass. Feb. 28, 2000)	\$2,800,000	33.00%
Sylvester v. Cigna Corp., No. 03-cv-00176, 401 F. Supp. 2d 147 (D. Me. 2005)	\$2,300,000	33.00%
Crandall v. PTC Inc., No. 16-cv-10471, 2017 U.S. Dist. LEXIS 217581, at *16 (D. Mass. July 14, 2017)	\$2,100,000	33.33%
In re Ibis Tech. Sec. Litig., No. 04-cv-10446, ECF No. 76 (D. Mass. April 26, 2007)	\$1,900,000	33.00%
Kondash v. Citizens Bank, National Association, No. 18-cv-00288, 2020 WL 7641785, at *5 (D. R.I. Dec. 23, 2020)	\$1,837,500	33.33%
In re: V-Mark Software, Inc. Sec. Litig., No. 95-cv-12249, ECF No. 112 (D. Mass. Nov. 24, 1998)	\$1,750,000	33.00%
In re: Zoll Medical Corp. Sec. Litig., No. 94-cv-11579, ECF No. 51 (D. Mass. Oct. 5, 1998)	\$1,500,000	33.00%
Mohanty v. Avid Technology, Inc. et al. No. 16-cv-12336, ECF No. 69 (D.Mass. May 2, 2018)	\$1,325,000	33.33%
In re: Segue Software, Inc., No. 99-cv-10891, ECF No. 39 (D. Mass. July 31, 2001)	\$1,260,000	33.00%
Wright v. Southern New Hampshire University, 561 F.Supp.3d 211, 214 (D.N.H. Sept. 2021)	\$1,250,000	33.33%
Bennett v. Roark Capital Group, Inc., No. 09-cv-00421, 2011 WL 1703447, at *2 (D. Me. May 4, 2011)	\$1,100,000	33.33%

EXHIBIT 13

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Bernstein Litowitz Berger & Grossman LLP	In re Wells Fargo & Company Securities Litigation, No. 1:20-cv-04494	(S.D.N.Y.) (Aug. 2023) (Dkt. No. 190-9)	Senior Counsel: \$775 - \$825 Associates: \$425 - \$650 Staff Attorneys: \$350 - \$450 Case Managers & Paralegals: \$325 - \$400	\$900 - \$1,300
	In re Myriad Genetics, Inc. Securities Litigation, No. 2:19-cv-00707	(D. Utah) (Nov. 2023) (Dkt. No. 290)	Senior Counsel: \$775 - \$825 Associates: \$450 - \$600 Staff Attorneys: \$425 - \$450	\$900 - \$1,250
	Lord Abbett Affiliated Fund, Inc., et al. v. Navient Corp., et al., No. 1:16-cv-00112--MN	(D. Del.) (Feb. 2022) (Dkt. No. 347-5)	Senior Counsel: \$775 Associate: \$425 - \$700 Staff Attorney: \$350 - \$400 Paralegal: \$325 - \$350	\$900 - \$1,300
	SEB Investment Management AB, et al. v. Symantec Corporation and Gregory S. Clark, No. 3:18-cv-02902-WHA	(N.D.Cal.) (Dec. 2021) (Dkt. No. 415-3)	Senior Counsel: \$775 - \$800 Associate: \$425 - \$575 Staff Attorney: \$375 - \$425 Investigator: \$300 - \$575 Paralegal: \$325 - \$350	\$875 - \$1,300
Boies, Schiller & Flexner LLP	In re Grupo Televisa Securities Litigation, No. 1:18-cv-01979	(S.D.N.Y.) (Jul. 2023) (Dkt. No. 356)	Counsel: \$940 - \$970 Associate: \$670 - \$830 Summer Associate: \$450 Staff Attorney: \$380 - \$460 Paralegal: \$350	\$1,140 - \$2,110

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Boies, Schiller & Flexner LLP	Brown et al. v. Google LLC, No. 4:30-cv-03664-YGR-SVK	(N.D.Cal.) (Jun. 2022) (Dkt. No. 597)	Associate: \$475 - \$950 Paralegal: \$225 - \$380	\$725 - \$1,950
Cohen Milstein Sellers & Toll, PLLC	In re Wells Fargo & Company Securities Litigation, No. 1:20-cv-04494	(S.D.N.Y.) (Aug. 2023) (Dkt. No. 190-9)	Senior Counsel: \$925 Associates: \$525 - \$700 Staff Attorneys: \$600 - \$650 Discovery Attorneys: \$245 - \$495	\$750 - \$1,225
Hausfeld LLP	In re TikTok, Inc., Consumer Privacy Litigation, MDL No. 2948	(N.D.Ill.) (Mar. 2022) (Dkt. No. 197-20)	Of Counsel: \$875 Associate: \$500 - \$610 Paralegal: \$300 - \$325	\$725 - \$1,525
	In re Foreign Exchange Benchmark Rates Antitrust Litigation, No. 1:13-cv-07789-LGS	(S.D.N.Y.) (Jan. 2018) (Dkt. No. 939-3)	Associate: \$350 - \$500 Staff Attorney: \$350 - \$600 Contract Attorney: \$350 - \$425 Paralegal: \$75 - \$280	\$630 - \$1,375
Keker, Van Nest & Peters LLP	OpenGov, Inc. v. GTY Technology Holdings Inc. et al, No. 3:18-cv-07198-JSC	(N.D. Cal.) (Mar. 2019) (Dkt. No. 40-1)	Of Counsel: \$775 - \$1,075 Paralegal: \$250 - \$290	\$700 - \$1,500
Labaton Sucharow LLP	Boston Retirement System v. Alexion Pharmaceuticals, Inc. et al., No. 3:16-cv-02127-AWT	(D.Conn.) (Nov. 2023) (Dkt. No. 319-10)	Of Counsel: \$650 - \$875 Associate: \$475 - \$625 Staff Attorney: \$375 - \$475 Paralegal: \$325 - \$390	\$700 - \$1,325
	In re The Allstate Corporation Securities Litigation, No. 1:16-cv-10510	(N.D.Ill.) (Nov. 2023) (Dkt. No. 555)	Of Counsel: \$650 - \$875 Associate: \$425 - \$625 Staff Attorney: \$335 - \$475 Paralegal: \$150 - \$390	\$900 - \$1,375

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Levi & Korsinsky LLP	In re Nutanix, Inc. Securities Litigation, No. 3:21-cv-04080	(N.D.Cal.) (Aug. 2023) (Dkt. No. 318-2)	Of Counsel: \$450 - \$850 Associate: \$500 - \$675 Staff Attorney: \$475	\$900 - \$1,050
	In re U.S. Steel Consolidated Casts, No. 2:17-cv-00579-CB	(W.D.Penn.) (Mar. 2023) (Dkt. No. 351)	Of Counsel: \$450 - \$850 Associate: \$425 - \$850	\$765 - \$1,050
Lieff Cabraser Heimann & Bernstein, LLP	In re Bofl Holding, Inc. Securities Litigation, No. 3:15-cv-02324-GPC-KSC	(S.D.Cal) (Jul. 2022) (Dkt. No. 383-2)	Associate: \$395 - \$535 Staff Attorney: \$415	\$555 - \$1,150
Motley Rice LLC	Boston Retirement System v. Alexion Pharmaceuticals, Inc. et al., No. 3:16-cv-02127-AWT	(D.Conn.) (Nov. 2023) (Dkt. No. 319-10)	Senior Counsel: \$860 - \$950 Associate: \$550 - \$680 Staff Attorney: \$400 - \$500 Contract Attorney: \$325 - \$410 Paralegal: \$200 - \$425	\$895 - \$1,315 (Called "Member" Rates)
	In re Twitter Inc. Securities Litigation, No. 4:16-cv-05314-JST (SK)	(N.D.Cal.) (Oct. 2022) (Dk. No. 664-1)	Senior Counsel: \$925 Associate: \$425 - \$600 Staff Attorney: \$400 - \$425 Contract Attorney: \$395 Paralegal: \$175 - \$375	\$725 - \$1,100
Pomerantz LLP	Solomon v. Sprint Corporation et al., No. 1:19-cv-05272	(S.D.N.Y.) (Jul. 2023) (Dkt. No. 95)	Associate: \$425 - \$650 Paralegal: \$120 - \$365	\$875 - \$1,250
	Gong v. Neptune Wellness Solutions Inc. et al., No. 2:21-cv-01386	(E.D.N.Y.) (May 2023) (Dkt. No. 64)	Associate: \$450 - \$650 Paralegal: \$110 - \$365	\$875 - \$1,000

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Pomerantz LLP	Klein v. Altria Group, Inc. et al., No. 3:20-cv-00075-DJN	(E.D. Va.) (Feb. 2022) (Dkt. No. 311-5)	Of Counsel: \$645 - \$660 Associate: \$375 - \$660 Paralegal: \$335	\$815 - \$1,025
Quinn Emanuel Urquhart & Sullivan, LLP	Alaska Electrical Pension Fund, et al., v. Bank of America, N.A., et al., No. 14-cv-07126-JMF-OTW	(S.D.N.Y.) (Mar. 2018) (Dkt. No. 617-1)	Of Counsel: \$885 - \$920 Associate: \$630 - \$875 Staff Attorney: \$350 - \$535 Paralegal: \$300 - \$320 Litigation Support: \$175 - \$365	\$940 - \$1,375
Robbins Geller Rudman & Dowd LLP	Oregon Laborers Employers Pension Trust Fund v. Maxar Technologies, Inc. et al., No. 1:19-cv-00124	(D.Colo.) (Oct. 2023) (Dkt. No. 201-1)	Of Counsel: \$960 - \$1,080 Associate: \$465 - \$535 Staff Attorney: \$450 - \$460	\$760 - \$1,250
	Flynn v. Exelon Corporation et al., No. 1:19-cv-08209	(N.D.Ill.) (Aug. 2023) (Dkt. No. 207)	Associate: \$400 - \$595 Staff Attorney: \$390 - \$460 Research Analyst: \$315 Economic Analyst: \$355 - \$450	\$760 - \$1,315
	Purple Mountain Trust, Individually and on Behalf of All Others Similarly Situated v. Wells Fargo & Company et al., No. 3:18-cv-03948	(N.D.Cal.) (Jul. 2023) (Dkt. No. 232-1)	Of Counsel: \$600 - \$1,110 Associate: \$250 - \$550 Staff Attorney: \$300 - \$450 Research Analyst: \$315 Paralegal: \$275 - \$395 Litigation Support: \$175 - \$400	\$735 - \$1,375

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Robbins Geller Rudman & Dowd LLP	Azar v. Grubhub Inc., et al., No. 1:19-cv-07665	(N.D.Ill.) (Dec. 2022) (Dkt. No. 2279)	Of Counsel: \$955 Associate: \$375 - \$650 Staff Attorney: \$410 - \$445 Research Analyst: \$295 Investigator: \$290	\$675 - \$1,350
	Gordon v. Vanda Pharmaceuticals, Inc. and Mihael H Polymeropoulos, No. 1:19-cv-01108-FB-LB	(E.D.N.Y.) (Dec. 2022) (Dkt. No. 104-6)	Of Counsel: \$1,090 Associate: \$375 - \$630 Staff Attorney: \$420 - \$445 Litigation Support: \$300 Investigator: \$290	\$785 - \$1,350
Scott+Scott, Attorneys at Law, LLP	Abadilla, et al. v. Precigen, Inc. et al., No. 5:20-cv-06936-BLF	(N.D.Cal.) (Sep. 2023) (Dkt. No. 138)	Of Counsel: \$1,050 Associate: \$625 - \$795 Staff Attorney: \$675 Paralegal: \$395 - \$415	\$1,095 - \$1,595
	In re Infinity Q Diversified Alpha Fund Securities Litigation, No. 651295/2021	(New York County, New York) (Dec. 2022) (Dkt. No. 230)	Associate: \$675 - \$795 Staff Attorney: \$650 Research Analyst: \$395 Paralegal: \$395	\$995 - \$1,395

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Akin Gump Strauss Hauer & Feld LLP	In re Yellow Corporation, <i>et al.</i> , Debtors, No. 23-11069 (CTG)	(Bankr. D.Del.) (Oct. 2023) (Dkt. No. 889)	Senior Counsel and Counsel: \$1,055 - \$1,500 Associate: \$790 - \$1,125 Paralegal: \$435 - \$510	\$1,420 - \$1,995
	In re Pipeline Health System, LLC, <i>et al.</i> , Debtors, No. 22-90291 (MI)	(Bankr. S.D.Tex.) (Mar. 2023) (Dkt. No. 1169)	Senior Counsel: \$1,105 - \$1,300 Counsel: \$1,025 - \$1,190 Associate: \$670 - \$880 Paraprofessional: \$510	\$1,400 - \$1,775
	In re GTT Communications, Inc., <i>et al.</i> , Debtors, No. 21-11880-MEW	(Bankr. S.D.N.Y.) (Nov. 2021) (Dkt. No. 133)	Senior Counsel: \$845 - \$1,655 Counsel: \$1,025 - \$1,225 Associate: \$605 - \$1,130 ("2022 Range")	\$1,125 - \$1,995 ("2022 Range")
Cleary Gottlieb Steen & Hamilton LLP	In re ViewRay, Inc., <i>et al.</i> , Debtors, No. 23-10935 (KBO)	(Bankr. D.Del.) (Nov 2023) (Dkt. No. 428-2)	Associate: \$965 - \$1,105 Paralegal: \$430 Non-Legal: \$370	\$1,305 - \$1,930
Cleary Gottlieb Steen & Hamilton LLP	In re Genesis Global Holdco, LLC, <i>et al.</i> , Debtors, No. 23-10063 (SHL)	(Bankr. S.D.N.Y.) (May 2023) (Dkt. No. 316)	Counsel: \$1,280 - \$1,765 Associate: \$845 - \$1,400 Contract Attorney: \$300 - \$375 Litigation Paralegal: \$370 - \$430	\$1,305 - \$2,135
Dechert LLP	In re Bintago Inc., <i>et al.</i> , Debtors, No. 23-11394 (SHL)	(Bankr. S.D.N.Y.) (Nov. 2023) (Dkt. No. 220)	Counsel: \$1,175 Associate: \$775 - \$1,140 Legal Assistant: \$435 - \$490	\$1,275 - \$1,650

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Dechert LLP	In re PURDUE PHARMA L.P., <i>et al.</i> , Debtors, No. 19-23649-shl	(Bankr. S.D.N.Y.) (Aug. 2023) (Dkt. No. 5840)	Associate: \$880 - \$1,050 Paralegal: \$300	\$1,125 - \$1,650
DLA Piper LLP (US)	In re Instant Brands Acquisition Holdings Inc., <i>et al.</i> , Debtors, No. 23-90716 (DRJ)	(Bankr. S.D.Tex.) (Nov. 2023) (Dkt. No. 724-1)	Associate: \$670 - \$1,080 Law School Graduate: \$730 Research Analyst: \$500 Case Manager: \$380 - \$475	\$1,200 - \$1,640
	In re Amsterdam House Continuing Care Retirement Community, Inc., Debtor, No. 23-70989-ast	(Bankr. E.D.N.Y.) (Jun. 2023) (Dkt. No. 254)	Associate: \$750 - \$1,195 Paralegal: \$380 - \$475	\$1,195 - \$1,240
Freshfields Bruckhaus Deringer LLP	In re Talen Energy Supply, LLC, <i>et al.</i> , Debtors, No. 22-90054 (MI)	(Bankr. S.D.Tex.) (Jun. 2023) (Dkt. No. 2114-2)	Counsel: \$1,425 Associate: \$980 - \$1,200	\$1,690 - \$1,945
	In re Revlon, Inc. <i>et al.</i> , Debtors, No. 22-10760 (DSJ)	(Bankr. S.D.N.Y.) (Apr. 2023) (Dkt. No. 1835)	Counsel: \$843 Associate: \$321 - \$1,323 Paralegal/Non-Legal Staff: \$320 - \$525	\$1,057 - \$1,723
Gibson, Dunn & Crutcher LLP	In re Stimwave Technologies Incorporated, <i>et al.</i> , Debtors, No. 22-10541 (TMH)	(Bankr. D.Del.) (May 2023) (Dkt. No. 901)	Associate: \$1,105 - \$1,210	\$1,860
	In re Sequential Brands Group, Inc., <i>et al.</i> , Debtors, No. 21-11194 (JTD)	(Bankr. D.Del.) (Sep. 2021) (Dkt. No. 95)	Counsel: \$1,025 - \$1,210 Associate: \$610 - \$1,060	\$1,095 - \$1,645
Goodwin Procter LLP	In re Party City Holdco Inc., Debtor, No.23-90005	(Bankr. S.D.Tex.) (Nov. 2023) (Dkt. No. 1939-2)	Counsel: \$1,150 Associate: \$710 - \$1,095 Paralegal: \$520	\$1,250 - \$1,775
	In re Clarus Therapeutics Holdings, Inc., Debtor, No. 22-10845-MFW	(Bankr. D.Del.) (Mar. 2023) (Dkt. No. 354-1)	Counsel: \$1,075 Associate: \$675 - \$945 Paralegal: \$355 - \$495	\$1,095 - \$1,800

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Greenberg Traurig LLP	In re Vesttoo Ltd., <i>et al.</i> , Debtors, No. 23-11160 (MFW)	(Bankr. D.Del.) (Nov. 2023) (Dkt. No. 399)	Senior Counsel: \$1,645 Of Counsel: \$855 - \$900 Associate: \$650 - \$895 Paralegal: \$390 - \$475	Shareholder: \$880 - \$1,665
	In re Kabbage, Inc. d/b/a Kservicing, <i>et al.</i> , Debtors, No. 22-10951 (CTG)	(Bankr. D.Del.) (Jun. 2023) (Dkt. No. 855)	Associate: \$870 Paralegal: \$435	Shareholder: \$1,255 - \$1,540
Hogan Lovells US LLP	In re Mallinckrodt PLC, <i>et al.</i> , Debtors, No. 23-11258 (JTD)	(Bankr. D.Del.) (Dec. 2023) (Dkt. No. 744)	Senior Counsel: \$1,444 Of Counsel: \$1,135 - \$1,175 Senior Associate: \$1,065 - \$1,110 Associate: \$650 - \$890 Senior Research Analyst: \$390 Paralegal: \$390	\$885 - \$1,585
	In re LTL Management LLC, Debtor, No. 21-30589 (JCW)	(Bankr. D.N.J.) (May 2022) (Dkt. No. 2240-1)	Counsel: \$910 - \$1,735 Associate: \$605 - \$1,055 Paralegal: \$275 - \$550	\$950 - \$2,465
Jones Day	In re LTL Management LLC, Debtor, No. 23-12825 (MBK)	(Bankr. D.N.J.) (Sep. 2023) (Dkt. 1327)	Of Counsel: \$925 - \$1,275 Associate: \$325 - \$925 Staff Attorney: \$600 - \$625 Paralegal: \$213 - \$500	\$563 - \$1,800
	In re Purdue Pharma L.P., <i>et al.</i> , Debtors, No. 19-23649 (SHL)	(Bankr. S.D.N.Y.) (Jun. 2023) (Dkt. No. 5669)	Associate: \$650 - \$880 Paralegal & Staff: \$325 - \$450	\$1,050 - \$1,418

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Katten Muchin Rosenman LLP	In re Capstone Green Energy Corporation, <i>et al.</i> , Debtors, No. 23-11634 (LSS)	(Bankr. D.Del.) (Dec. 2023) (Dkt. No. 148-2)	Of Counsel: \$735 - \$1,440 Counsel and Special Staff: \$460 - \$1,230 Associate: \$300 - \$935 Paralegal: \$90 - \$650	\$835 - \$1,795
	In re Voyager Digital Holdings, Inc. <i>et al.</i> , Debtors, No. 22-10943 (MEW)	(Bankr. S.D.N.Y.) (Mar. 2023) (Dkt. No. 1147)	Associate: \$765 - \$815	\$1,040 - \$1,755
King & Spalding LLP	In re DCL Holdings (USA), Inc., <i>et al.</i> , Debtors, No. 22-11319 (JKS)	(Bankr. D.Del.) (May 2023) (Dkt. No. 442)	Associate: \$685 - \$1,315 Project Assistant: \$250	\$1,340 - \$1,780
	In re Briggs & Stratton Corporation, <i>et al.</i> , Debtors, No. 20-43597	(Bankr. E.D.Mo.) (Jul. 2020) (Dkt. No. 194)	Counsel: \$750 - \$1,005 Associate: \$440 - \$750 Paraprofessional: \$190 - \$325	\$820 - \$1,290
Kirkland & Ellis, LLP	In re MVK Farmco LLC, <i>et al.</i> , Debtors, No. 23-11721 (LSS)	(Bankr. D.Del.) (Dec. 2023) (Dkt. No. 353)	Associate: \$715 - \$1,295	\$1,245 - \$2,045
	In re: Celsius Network LLC, No. 22- 10964	(Bankr. S.D.N.Y.) (Aug. 2022) (ECF No. 360)	Of Counsel: \$805 - \$1,845 Associate: \$650 - \$1,245	\$1,135 - \$1,995
Mayer Brown LLP	In re GWG Holdings, Inc., <i>et al.</i> , Debtors, No. 22-90032 (MI)	(Bankr. S.D.Tex.) (Dec. 2022) (Dkt. No. 1220)	Counsel: \$1,025 to \$1,250 Associate: \$590 - \$1,075 Paraprofessionals: \$210 - \$475	\$1,120 - \$1,940
McDermott Will & Emery LLP	In re OSG Holdings, Inc., <i>et al.</i> , Debtors, No. 23-90799 (CML)	(Bankr. S.D.Tex.) (Dec. 2023) (Dkt. No. 223)	Associate: \$655 - \$1,170 Paralegal: \$295 - \$670	\$1,215 - \$1,860

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
McDermott Will & Emery LLP	In re: Voyager Digital Holdings, Inc., No. 22-0943	(Bankr. S.D.N.Y.) (Aug. 2022) (Dkt. No. 317)	Of Counsel: \$755 - \$1,300 Associate: \$545 - \$1,190	\$875 - \$1,510
Milbank LLP	In re Voyager Aviation Holdings, LLC <i>et al.</i> , Debtors, No. 23-11177 (JPM)	(Bankr. S.D.N.Y.) (Jan. 2024) (Dkt. No. 662)	Of Counsel: \$1,625 Special Counsel: \$1,425 Associate: \$575 - \$1,300 Case Manager: \$450 Legal Assistant: \$300 - \$390	\$1,495 - \$2,045
	In re Talen Energy Supply, LLC, <i>et al.</i> , Debtors, No. 22-90054 (MI)	(Bankr. S.D.Tex.) (Mar. 2023) (Dkt. No. 1931)	Special Counsel: \$1,320 Associate: \$695 - \$1,200	
	In re TRIVASCULAR SALES LLC, <i>et al.</i> , No. 20-31840-SGJ	(Bankr. E.D.Tex.) (Aug. 2020) (Dkt. No. 291)	Of Counsel: \$670 - \$1,225 Senior Counsel: \$520 - \$1,175 Associate: \$355 - \$855 Paraprofessional: \$230 - \$480	
O'Melveny & Myers LLP	In re: FHC Holdings Corporation, <i>et al.</i> , Debtors, No. 20-13076-BLS	(Bankr. D. Del.) (Jun. 2021) (Dkt. No. 792)	Senior Counsel: \$1,105 Associate: \$708 - \$940	\$1,100 - \$1,400
	In re Remington Outdoor Company, Inc., <i>et al.</i> , Debtors, No. 20-81688-11	(Bankr. N.D. Ala.) (Jul. 2020) (Dkt. No. 24)	Associate and Counsel: \$545 - \$995 Paraprofessional and Legal Assistant: \$180 - \$415	

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Paul, Weiss, Rifkind, Wharton & Garrison LLP	In re Proterra Inc, <i>et al.</i> , Debtors, No. 23-11120 (BLS)	(Bankr. D.Del.) (Oct. 2023) (Dkt. No. 428)	Counsel: \$1,650 Associate: \$825 - \$1,380 Staff Attorney: \$595 - \$625 Senior Research Analyst: \$380 Paralegal: \$410 - \$470	\$1,815 - \$2,175
	In re Mallinckrodt PLC, <i>et al.</i> , Debtors, No. 20-12522 (JTD)	(Bankr. D.Del.) (Apr. 2022) (Dkt. No. 7037)	Counsel: \$1,525 Associate: \$1,040 - \$1,135	\$1,605 - \$2,025
Proskauer Rose LLP	In re Off Lease Only LLC, <i>et al.</i> , Debtors, No. 23-11388 (CTG)	(Bankr. D.Del.) (Nov. 2023) (Dkt. No. 206)	Senior Counsel: \$1,395 - \$1,425 Associate: \$995 - \$1,215 Paralegal: \$340 - \$530	\$1,550 - \$1,950
	In re Alpha Media Holdings LLC, <i>et al.</i> ,	(Bankr. E.D. Va.) (Mar. 2021) (Dkt. No. 2021-00001)	Senior Counsel: \$1,150 - \$1,375	\$1,225 - \$1,795
Quinn Emanuel Urquhart & Sullivan, LLP	In re FTX Trading LTD, <i>et al.</i> , Debtors, No. 22-11068 (JTD)	(Bankr. D.Del.) (Sep. 2023) (Dkt. No. 2531)	Counsel: \$1,215 Associate: \$747 - \$1,337 Paralegal: \$432	\$1,247 - \$1,917
Ropes & Gray LLP	In re VH Legacy/Liquidation, LLC, <i>et al.</i> , Debtors, No. 22-11019 (LSS)	(Bankr. D.Del.) (May 2023) (Dkt. No. 417)	Associate: \$900 - \$1,310 Law Clerk: \$770 Paralegal: \$320 - \$565	\$1,520 - \$1,900
	In re Vewd Software USA, LLC, <i>et al.</i> , Debtors, No. 21-12065 (MEW)	(Bankr. S.D.N.Y.) (Jan. 2022) (Dkt. No. 62)	Counsel: \$770 - \$1,140 Associate: \$700 - \$1,270 Paraprofessional: \$290 - \$485	\$1,400 - \$2,100
Shearman & Sterling LLP	In re Venus Liquidation Inc., <i>et al.</i> , Debtors, No. 23-10738 (JPM)	(Bankr. S.D.N.Y.) (Jan. 2024) (Dkt. No. 727)	Counsel: \$1,300 Associate: \$1,215 - \$1,415 Law Clerk: \$225 - \$995	\$1,975 - \$2,130

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Shearman & Sterling LLP	In re Carlson Travel, Inc., <i>et al.</i> , Reorganized Debtors, No. 21-90017 (MI)	(Bankr. S.D. Tex.) (Jan. 2022) (Dkt. No. 249)	Associate: \$435 - \$1,210 Paralegal: \$395	\$1,195 - \$1,825
Sheppard, Mullin, Richter & Hampton LLP	In re Mariner Health Central, Inc., <i>et al.</i> , Debtors, No. 22-41079	(Bankr. N.D. Cal.) (Apr. 2023) (Dkt. No. 522)	Associate: \$700 - \$945	\$1,355 - \$1,555
Sidley Austin LLP	In re Legacy IMDBS, Inc., <i>et al.</i> , Debtors, No. 23-10852 (KBO)	(Bankr. D.Del.) (Nov. 2023) (Dkt. No. 782)	Associate: \$960 - \$1,230 Paralegal: \$555	\$1,625 - \$1,800
	In re Tricida, Inc., Debtor, No. 23-10024 (JTD)	(Bankr. D.Del.) (Apr. 2023) (Dkt. No. 419)	Associate: \$700 - \$1,275 Paralegal: \$540	\$1,300 - \$1,850
Simpson Thacher & Bartlett LLP	In re Zymergen Inc., <i>et al.</i> , Debtors, No. 23-11661 (KBO)	(Bankr. D.Del.) (Jan. 2024) (Dkt. No. 314)	Counsel: \$1,525 Associate: \$ 745 - \$1,290 Paralegal: \$545	\$1,795 - \$2,195
Skadden, Arps, Slate, Meagher & Flom LLP	In re: Armstrong Flooring, Inc., No. 22-bk-10426	(Bankr. D. Del. May 2022) (ECF No. 187)	Of Counsel: \$1,300 - \$1,495 Associate: \$550 - \$1,275	\$1,465 - \$1,980
	In re VIVUS, Inc. <i>et al.</i> , Reorganized Debtors, No. 20-bk-11779 (LSS)	(Bankr. D. Del.) (Jan. 2021) (Dkt. No. 443)	Of Counsel: \$1,260 Associate: \$695 - \$1,120 (\$495 for Associate pending Admission)	\$1,425 - \$1,565
	In re JCK Legacy Company, <i>et al.</i> , Debtors, No. 20-10418 (MEW)	(Bankr. S.D.N.Y.) (Oct. 2020) (Dkt. No. 938)	Counsel: \$1,125 - \$1,325 Associate: \$575 - \$1,120 Paraprofessional: \$95 - \$520	\$1,275 - \$1,775
Sullivan & Cromwell LLP	In re SVB Financial Group, Debtor, No. 23-10367 (MG)	(Bankr. S.D.N.Y.) (Sep. 2023) (Dkt. No. 543)	Senior Counsel: \$2,165 Special Counsel: \$1,575 - \$1,790 Associate: \$775 - \$1,475 Paralegal: \$425 - \$595 Legal Analyst: \$595	\$1,083 - \$2,165

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
	In re FTX Trading LTD, <i>et al.</i> , Debtors, No. 22-11068 (JTD)	(Bankr. D. Del.) (Aug. 2023) (Dkt. No. 2271)	Of Counsel: \$2,165 Special Counsel: \$1,575 - \$1,825 Associate: \$775 - \$1,475 Law Clerk: \$550 Paralegal: \$425 - \$595 Legal Analyst: \$595	\$1,595 - \$2,165
Vinson & Elkins LLP	In re Core Scientific, Inc., <i>et al.</i> , Debtors, No. 22-90341 (DRJ)	(Bankr. S.D.Tex.) (Sep. 2023) (Dkt. No. 1251)	Counsel: \$1,590 Associate: \$730 - \$1,220 Paralegal: \$420	\$1,425 - \$1,920
	In re Heartbrand Holdings, Inc., <i>et al.</i> , Reorganized Debtors, No. 22-90127 (CML)	(Bankr. S.D.Tex.) (Nov. 2023) (Dkt. No. 339)	Counsel: \$1,040 - \$1,130 Senior Associate: \$1,005 Associate: \$615 - \$950 Paralegal: \$385 - \$480	\$1,130 - \$1,810
Weil, Gotshal & Manges LLP	In re Pacificco Inc., <i>et al.</i> , Reorganized Debtors, No. 23-10620 (KBO)	(Bankr. D. Del.) (Jan. 2024) (Dkt. No. 21-4)	Counsel: \$1,375 - \$1,425 Associate: \$750 - \$1,345 Paralegal: \$460 - \$530 <i>Excluding German Counsel and Associate Rates</i>	\$1,450 - \$2,095 <i>Excluding German Partner Rates</i>
Willkie Farr & Gallagher LLP	In re Western Global Airlines, Inc., <i>et al.</i> , Debtors, No. 23-11093 (KBO)	(Bankr. D.Del.) (Nov. 2023) (Dkt No. 440-1)	Counsel: \$1,380 Associate: \$680- \$1,315 Paralegal: \$315 - \$540	\$1,500 - \$2,050
Wilmer Cutler Pickering Hale and Dorr LLP	In re INFINITY PHARMACEUTICALS, INC., Debtor, No. 23-11640 (BLS)	(Bankr. D. Del.) (Feb. 2024) (Dkt. No. 216)	Associate: \$865 - \$1,120 Senior Paralegal: \$575 - \$710	\$1,650 - \$1,865 ("2024 Rate")

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
	In re DIAMOND SPORTS GROUP, LLC, <i>et al.</i> , Debtors, No. 23-90116 (CML)	(Bankr. S.D.Tex.) (Aug. 2023) (Dkt. No. 1070-4)	Counsel: \$1,195 Senior Associate: \$940 - \$1,195 Associate: \$850 Senior Paralegal: \$650 - \$660	\$1,205 - \$1,920
Wilson Sonsini Goodrich & Rosati	In re Tonopah Solar Energy, LLC, Debtor, No. 20-11884 (KBO)	(Bankr. D. Del.) (Jul. 2020) (Dkt. No. 43)	Counsel: \$440 - \$1,350 Associate: \$510 - \$920 Legal Staff: \$120 - \$480	Member: \$925 - \$1,750