

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

OKLAHOMA FIREFIGHTERS  
PENSION AND RETIREMENT  
SYSTEM,

Plaintiff,

v.

BIOGEN INC., MICHEL VOUNATSOS,  
AND ALISHA ALAIMO,

Defendants.

Case No. 1:22-cv-10200-WGY

**ASSENTED TO MOTION AND [PROPOSED] ORDER  
TO PROVIDE NOTICE TO THE CERTIFIED CLASS**

Lead Plaintiff and Certified Class Representative Oklahoma Firefighters Pension and Retirement System (“Lead Plaintiff”), through its undersigned counsel, moves to provide notice of this action to the Certified Class. Defendants Biogen Inc. (“Biogen”), Michel Vounatsos, and Alisha Alaimo assent to the Motion. In support of this Motion, Lead Plaintiff states as follows:

1. On September 5, 2024, the Court certified this action as a class action under Rule 23 of the Federal Rules of Civil Procedure. ECF No. 100.

2. The Class consists of: All persons and entities who purchased or otherwise acquired common stock of Biogen, Inc. between June 8, 2021, and July 12, 2021, inclusive (the “Class Period”). Excluded from the Class are Defendants and their immediate families, the Company’s officers and directors at all relevant times, as well as

their immediate families, Defendants' legal representatives, heirs, successors, or assigns, and any entity in which Defendants have or had a controlling interest. *See* ECF Nos. 80, 100, 108.

3. The terms and form of the proposed Court-Ordered Legal Notice ("Postcard Notice"), attached hereto as Exhibit A, and Notice of Pendency of Class Action (the "Long-Form Notice"), attached hereto as Exhibit B, are approved.

4. The proposed procedures for giving notice to the Class as set forth in this Assented to Motion and [Proposed] Order comply with the requirements of due process and with Rule 23 of the Federal Rules of Civil Procedure and constitute the best notice practicable under the circumstances.

5. The firm of Strategic Claims Services ("Notice Administrator") is appointed and authorized to supervise and administer the notice procedure.

6. Defendant Biogen shall produce, or through Biogen's transfer agent cause to be produced, to the Notice Administrator a list, in electronic form, of the names and addresses of all persons who purchased or otherwise acquired Biogen securities at any time during the Class Period (i.e., June 8, 2021 through July 12, 2021, inclusive) (the "Transfer List") no later than five (5) business days after the Court's approval and entry of this Order.

7. No later than ten (10) business days after the Transfer List is produced to the Notice Administrator (the "Notice Date"), the Notice Administrator shall send, by first class mail, the agreed-upon proposed Postcard Notice, substantially in the form attached hereto as Exhibit A, to each person or entity identified on the Transfer List. For all Postcard

Notices returned as undeliverable, the Notice Administrator shall use best efforts to locate updated addresses.

8. The Notice Administrator shall use reasonable efforts to give notice and provide a link to the electronic Long-Form Notice to nominee purchasers, such as brokerage firms and other persons and entities who may have purchased or otherwise acquired Biogen securities during the Class Period for the beneficial interest of persons or entities other than themselves. Such nominees shall within seven (7) calendar days of receipt of electronic access to the Long-Form Notice, either (a) provide a list of the names, addresses and email addresses (to the extent available) of all such beneficial owners to the Notice Administrator, in which event the Notice Administrator is ordered to send the Postcard Notice or email link to the electronic Long-Form Notice promptly to such identified beneficial owners; (b) request the link to the electronic Long-Form Notice from the Notice Administrator and, within seven (7) calendar days of receipt, forward the link to all of their clients who are beneficial owners and for whom valid email addresses are available; or (c) request from the Notice Administrator copies of the Postcard Notice sufficient to send to all of their clients who are beneficial owners and, within seven (7) calendar days of receipt of the Postcard Notices, mail them to all such beneficial owners. Nominees who elect to follow procedure (b) or (c) shall also send a statement to the Notice Administrator confirming that the mailing or emailing was made as directed and shall retain their mailing records for use in connection with any further notices that may be provided in the Action.

9. Upon full and timely compliance with this provision, Nominees who mail

the Postcard Notice or email a link to the Long-Form Notice to beneficial owners, or who provide names, addresses, and email addresses of beneficial owners to the Notice Administrator, may seek reimbursement of their reasonable expenses actually incurred by providing the Notice Administrator with proper documentation supporting the expenses for which reimbursement is sought. The Nominees shall be reimbursed solely for their reasonable out-of-pocket expenses incurred in providing notice to beneficial owners, which expenses would not have been incurred except for the providing of names and addresses, in amounts up to: (i) \$0.02 per name, mailing address, and email address (to the extent available) provided to Notice Administrator; (ii) \$0.02 per email for emailing notice; or (iii) \$0.02 per postcard, plus postage at the pre-sort rate used by the Notice Administrator, for mailing the Postcard Notice, subject to further order of this Court with respect to any dispute concerning such reimbursement.

10. Contemporaneously with the mailing of the Postcard Notice, Class Counsel or the Notice Administrator shall establish a website for Action, [www.strategicclaims.net/BiogenSecuritiesLitigation/](http://www.strategicclaims.net/BiogenSecuritiesLitigation/), from which Class Members may download copies of the Long-Form Notice, Summary Notice of Pendency of Class Action (“Summary Notice”), Postcard Notice, the operative Complaint, the Court’s order certifying the Class, and this Order. In addition, Class Counsel shall post the Long-Form Notice on their respective websites.

11. The Notice Administrator shall provide copies of the Long-Form Notice to Class Members upon reasonable request.

12. Within five (5) business days after the Notice Date, the Notice

Administrator shall cause the Summary Notice, substantially in the form attached hereto as Exhibit C, to be transmitted over *GlobeNewswire*.

13. The Postcard and Long-Form Notices shall provide an address for the purpose of receiving requests for exclusion from the Class and requests for additional copies of the Long-Form Notice. The requests for exclusion from the Class shall be made by submitting a written request for exclusion as set forth in the Long-Form Notice and shall be postmarked within sixty (60) calendar days after the Notice Date (the “Exclusion Date”). Except for any members of the Class who timely submit requests for exclusion, Plaintiffs and members of the Class may not, directly or indirectly, representatively, or in any other capacity, commence or continue to pursue any action or proceeding in any court or tribunal asserting any of the claims that are brought or could have been brought in this action, unless the Court issues an order de-certifying the Class or excluding them from the Class at a later date.

14. The Notice Administrator shall identify and number all exclusion requests received and create copies of those requests for all parties. The Notice Administrator shall provide via email weekly reports of exclusion requests received to counsel for all parties. The Notice Administrator will maintain original requests in its files.

15. No later than fifteen (15) business days after the Exclusion Date, Class Counsel shall file with the Court proof of mailing of the Postcard Notice, proof of publication of the Summary Notice, and an affidavit setting forth a list of all persons and entities who have requested exclusion from the Class.

16. Except for the costs associated with obtaining and producing Biogen’s

Transfer List, the costs of the notice process shall be borne by Lead Plaintiff, and not by Defendants.

17. This Order may be modified by the Court upon motion by either or both parties, or for good cause shown.

Dated: February 20, 2026

Respectfully submitted,

**CERTIFICATE OF SERVICE**

I hereby certify that on February 20, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Jeffrey C. Block  
Jeffrey C. Block

/s/ Jeffrey C. Block

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*Attorneys for Lead Plaintiff Oklahoma  
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**ORDER**

IT IS SO ORDERED.

Dated \_\_\_\_\_

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Honorable William G. Young  
United States District Judge