

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAVISHANKER NARAYANAN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MAREX GROUP PLC, IAN LOWITT, and ROBERT
IRVIN,

Defendants.

Case No. 1:25-cv-08393-RA-SDA

[rel. 1:25-cv-08368-RA-SDA]

CLASS ACTION

**DECLARATION OF PAUL MULHOLLAND OF STRATEGIC CLAIMS SERVICES
REGARDING THE PROPOSED NOTICE PROGRAM, ADMINISTRATION COSTS,
AND THE PROPOSED DISTRIBUTION FLOOR**

I, Paul Mulholland, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am President and CEO of Strategic Claims Services ("SCS"), the proposed Claims Administrator. SCS is a nationally recognized class action administration firm located in Media, Pennsylvania. I have over thirty (30) years of experience specializing in litigation support services for class action cases, and I have administered over seven hundred and fifty (750) class action settlements. I have also testified as an expert witness in numerous class action matters. I am a Certified Public Accountant (inactive) and Certified Valuation Analyst (inactive) and have served on advisory boards and boards of directors for companies in the Philadelphia area. I also served as an adjunct professor of accounting and finance at Neumann University. Attached as **Exhibit A** is a copy of my resume.

2. SCS is one of the leading U.S. notice and claims administration firms and has been in business since 1999. During this time, SCS has handled over \$4 billion in settlement/judgment funds and has provided notice and administration services for various types of class action cases. Attached as **Exhibit B** is a copy of SCS's brochure and summary. Additional information about

SCS can be obtained at www.strategicclaims.net. SCS's experience includes handling the notice and administration services for the following settlements:

Christine Asia Co. Ltd. et al. v. Jack Yun Ma et al.

Master File No. 1:15-md-02631-CM (SDA) (S.D.N.Y.)

Defendants agreed to pay \$250 million to resolve the action. During the administration, SCS disseminated over 1.2 million notices and processed over 166,000 claims. The action alleged that Defendants violated the Securities Exchange Act of 1934 by failing to disclose the existence, content and significance of a July 16, 2014 administrative guidance meeting with Chinese authorities, and thus misrepresented the true state of Alibaba's business and operations, as well as the risks Alibaba was facing at the time of its September 2014 Initial Public Offering and during the class period. The Complaint further alleged that, as a result of the alleged misrepresentations and omissions relating to the July 16, 2014 meeting, the price of Alibaba's American Depositary Shares ("ADSs") was artificially inflated and that, as a result of the disclosures made in the "White Paper Regarding the Administrative Guidance Provided to Alibaba Group", the price of Alibaba's ADSs dropped \$4.29 per share, causing investor losses.

Friel v. Dapper Labs, Inc., et al.

Case No. 1:21-cv-05837-VM (S.D.N.Y.)

Dapper Labs, Inc. agreed to settle the action in exchange for a payment of \$4 million plus business changes. During the administration, SCS provided notice to 675,000 class members and processed 31,000 claims. The action alleged that defendants violated the federal securities laws by promoting, offering, and selling unregistered securities to investors in the form of Moments - non-fungible tokens.

Ferguson, et al. v. Ruane, Cunniff & Goldfarb Inc., et al.

No. 1:17-cv-06685-ALCBCM (S.D.N.Y.)

DST Systems, Inc. agreed to pay \$124,625,000 to settle allegations that Defendants violated the Employee Retirement Income Security Act of 1974 ("ERISA"), by among other things, investing an inappropriate amount of the Plan's assets in the stock of Valeant Pharmaceuticals ("VRX") and failing to timely reduce and/or eliminate the Plan's investments in VRX. SCS's services for this case included notification and distribution of payments to about 15,000 class members.

In re Silver Wheaton Corp. Securities Litigation

Case No. 15-cv-5146-CASPJWx (C.D. Cal.)

Defendants agreed to pay \$41.5 million to resolve the action. During the administration, SCS disseminated over 400,000 notices and processed over 100,000 claims. The action alleged that Silver Wheaton Corp., n/k/a Wheaton Precious Metals Corp., violated the federal securities laws by allegedly making false and misleading statements to the investing public, including that Silver Wheaton's 2010-2014 financial statements were misleading for failing to record a tax liability

or to disclose a contingent liability for alleged future tax liabilities relating to income earned by Silver Wheaton's foreign subsidiaries outside of Canada.

Daniel Harper, et al. v. Shaquille O'Neal, et al.

Case No.: 1:23-cv-21912-FAM (S.D. Fla.)

Settling Defendants agreed to pay up to \$11 million to resolve a lawsuit alleging that they violated the federal securities laws by promoting, offering, and selling unregistered securities to investors in the form of Astrals NFTs or GLXU tokens, which are forms of crypto-assets. This was a claims-made settlement.

Hawaii Structural Ironworkers Pension Trust Fund v. AMC Entertainment Holdings, Inc., et al.

Case No. 1:18-cv-00299-AJN (S.D.N.Y.)

Defendants agreed to pay \$18 million to resolve action involving claims against AMC Entertainment Holdings, Inc. ("AMC"), certain of its current and former officers and directors, and certain of the underwriters of AMC's Secondary Public Offering on or about February 8, 2017 under Sections 11, 12(a)(2), and 15 of the Securities Act of 1933 and Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 regarding alleged material misstatements and omissions in the registration statement for the SPO and in certain other public disclosures. During the administration, SCS disseminated approximately 3.1 million notices.

Monk v. Johnson & Johnson et al.

Civil Action No. 10-cv-4841 (FLW)(DEA) (D.N.J.)

Defendants agreed to pay \$22.9 million to resolve action alleging that they failed to disclose and/or misrepresented (i) significant quality control issues within J&J, and (ii) the true financial impact of these quality control issues and resulting product recalls on J&J, and failed to disclose and/or misrepresented the true facts and circumstances surrounding the Company's product recalls. During the administration, SCS disseminated 2.2 million notices and processed approximately 600,000 claims.

In re DiDi Global Inc. Securities Litigation

Case No. 1:21-cv-05807-LAK-VF (S.D.N.Y.)

DiDi Global, Inc. ("DiDi") agreed to pay \$740 million to resolve an action alleging violation of the federal securities laws by making false and misleading statements and omissions in the Registration Statement and engaging in deceptive conduct in connection with DiDi's June 30, 2021 Initial Public Offering ("IPO"). The operative complaint alleged that DiDi failed to disclose that the Chinese government had warned DiDi not to go forward with its IPO until it was in compliance with Chinese cybersecurity and data privacy and protection laws, and that DiDi misstated that it was in material compliance with such laws. The complaint further alleged that, on July 2, 2021, just two days after the IPO, the Cyberspace Administration of China ("CAC") placed DiDi on Cybersecurity review and suspended its registration of new users on its China ride sharing platform. The operative complaint alleged that DiDi deceived the underwriters to

close the IPO by misrepresenting that the CAC's July 2, 2021 sanctions would not have a material adverse effect on DiDi's business. The operative complaint alleged that in the following days, the CAC announced DiDi was in violation of cybersecurity and data protection laws and implemented additional sanctions against DiD, and the complaint alleges that the CAC's sanctions caused DiDi's share price to decline substantially as these additional sanctions were announced over the three week class period, damaging investors.

3. In addition to the cases referenced above, SCS has administered numerous other notice plans and settlements in the S.D.N.Y. Attached as **Exhibit C** is a list of 30 class action settlements administered by SCS in the past five years.

4. SCS has been retained by Lead Counsel, subject to Court approval, to provide notice and claims administration services for the settlement of the Action.¹ The services that SCS has been retained to provide include: (i) providing direct notice of the Settlement to Settlement Class Members and nominees via mailed or emailed notice; (ii) causing the publication of a summary notice over an electronic newswire service (*GlobeNewswire*); (iii) establishing a website for the Settlement to host copies of Settlement notices and other Settlement-related documents for Settlement Class Members to download, as well as to provide an online claim filing portal; (iv) making available a toll-free telephone number by which Settlement Class Members can call to obtain information about the Settlement; (v) receiving, processing, and reviewing claims received; (vi) performing quality assurance reviews of claims submitted; (vii) undertaking a curing process to remedy deficiencies in the claims submitted; (viii) distributing the proceeds of the Settlement; (ix) providing reports on the administration as Lead Counsel or the Court may require; and (x) other services as necessary to administer the Settlement.

5. At the request of Lead Counsel, I am submitting this declaration to provide the Court and the Parties to the above-captioned Action with information about the procedures and

¹ All capitalized terms used that are not otherwise defined herein shall have the definitions set forth in the Stipulation and Agreement of Settlement dated August 20, 2026 ("Stipulation").

methods to be used in providing notice of the proposed Settlement to Settlement Class Members, administering the Settlement, and distributing Settlement payments to eligible Settlement Class Members. I have personal knowledge of the matters stated herein. If called on to do so, I could and would testify competently thereto.

DIRECT NOTICE CAMPAIGN

6. The proposed notice plan in this matter uses procedures that have been designed to provide direct mail notification and/or electronic mail notification to every investor who is a member of the Settlement Class and who can be identified with reasonable effort. In addition, direct mail notification will be provided to thousands of financial institutions, whether brokerage firms, banks, or other third-party nominees, that regularly monitor proposed securities class action settlements. All persons and entities identified as potential Settlement Class Members will be mailed a Postcard Notice and/or emailed either the electronic Postcard Notice or the link to the electronic Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for an Award of Attorneys' Fees and Litigation Expenses ("Notice") and Proof of Claim and Release form ("Claim Form", and together with the Notice, "Notice Packet") on the Settlement Website, www.strategicclaims.net/Marex/ ("Settlement Website"). The Notice, Claim Form, and Settlement Website will include instructions for claim submission and contact information for SCS. The proposed notice plan also calls for publication of the Summary Notice of (i) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (ii) Settlement Hearing; and (iii) Motion for an Award of Attorneys' Fees and Litigation Expenses ("Summary Notice") to be transmitted once over the *GlobeNewswire*. In addition, SCS will send the Depository Trust Company ("DTC") the Notice Packet for the DTC to publish on its legal notice system. The DTC's legal notice system provides

DTC participants with 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.

7. Details of the complete proposed notice plan are outlined below.

8. If the Court authorizes SCS's retention as Claims Administrator, and subject to the Court's approval of the notice plan set forth in the Proposed Order Preliminarily Approving Settlement and Providing For Notice (the "Preliminary Approval Order"), SCS will, after cleanup and deduplication, not later than twenty (20) business days after the date of entry of the Preliminary Approval Order (the "Notice Date"), initially send a copy of the Postcard Notice by First-Class Mail—or, where it receives a valid email address, email the electronic Postcard Notice—to all persons and entities identified as potential Settlement Class Members on the records to be obtained from any identified former transfer agents of Marex Group plc ("Marex"), with such records to be provided to SCS within ten (10) calendar days of entry of the Preliminary Approval Order pursuant to paragraph 4.2 of the Stipulation.

9. Any transfer agent(s) will only have the contact information for the small number of investors who hold their securities in their own names. These investors typically make up a very small percentage of a class, as the vast majority of investors hold their securities through a brokerage firm, bank, institution, or other third-party nominee ("Nominees"). These potential Settlement Class Members are beneficial purchasers whose securities are held in "street name"; i.e., the securities are purchased and held by one of the Nominees on behalf of the beneficial purchaser. To obtain contact information for investors at the beneficial purchaser level, SCS uses a procedure designed to obtain contact information from the Nominees which hold the securities on behalf of the beneficial purchasers of the securities. In the twenty-seven years that SCS has been notifying potential class members of actions involving securities publicly traded on the

Nasdaq, SCS has found that the majority of beneficial purchasers are reached through the Nominees.

10. For this matter, SCS will send mailings to each entity included on a proprietary list that SCS regularly reviews and updates, and which currently consists of approximately 2,500 Nominees. This list includes the largest and most common brokerage firms, banks, and other institutions involving publicly traded securities and is contained in a database that SCS created and maintains. In SCS's experience, the institutions included in this database represent a significant majority of the beneficial holders of the securities in most settlements involving publicly traded companies. The mailing would notify the Nominees of the proposed Settlement and inform them of their obligation to either (i) provide SCS with the names, addresses, and email addresses (if any) of their clients who may be Settlement Class Members; (ii) to request the link to the electronic Notice Packet to email directly to their customers and clients; or (iii) to request copies of the Postcard Notice to provide directly to their customers and clients. As noted above, Nominees will also be notified of the Settlement through the DTC's legal notice system publication of the Notice Packet. As necessary, SCS will follow up with nominees who do not respond in a timely manner.

11. SCS will promptly either: (a) email the link to the location of the Notice Packet to potential Settlement Class Members for whom it is able to obtain valid email addresses from Nominees; or (b) mail the Postcard Notice directly to all potential Settlement Class Members identified by Nominees, if no email address can be obtained. SCS will also send copies of the Postcard Notice or links to the location of the electronic Notice Packet directly to Nominees who indicate they will directly forward them to their customers and clients who may be Settlement

Class Members. Each of these requests will be completed in a timely manner pursuant to the proposed Preliminary Approval Order.

12. SCS follows best practices to both validate email addresses and increase their deliverability. Before emailing notice, SCS will run the email addresses provided by Nominees through ZeroBounce in order to determine the validity of the email addresses on the list. SCS will format the content to remove tables/images/other formatting that can be flagged as Spam markers. SCS will comply with any CAN-SPAM requirements (unsubscribe links, identifying information, etc.). Additionally, SCS will comply with email hosts to ensure that SCS follows their requirements. For example, currently, Google and Yahoo require one click unsubscribe functionality and email server identification markers in the DNS settings of the Settlement website.

13. All name and address data obtained by SCS will be reviewed to identify and eliminate exact name and address duplicates and incomplete data prior to mailing or emailing. Any Postcard Notices that are returned as undeliverable mail will be reviewed to determine if an alternative or updated address is available from the United States Postal Service and/or through skip-tracing, and SCS will re-mail Postcard Notices to the updated or alternative addresses. Any emailed electronic Postcard Notices or links to the electronic Notice Packet that “bounce back” undeliverable will be mailed a copy of the Postcard Notice, where SCS has been provided with a mailing address for such potential Settlement Class Members.

14. SCS will supplement the direct mailing and emailing program described above by publishing the Summary Notice over the *GlobeNewswire*, a national online newswire. News outlets often use posted notices as the basis for their own stories about litigation settlements involving publicly traded companies, thereby creating added awareness of the proposed Settlement among investors.

SETTLEMENT WEBSITE AND TOLL-FREE PHONE

15. In conjunction with the mailing and emailing of direct notice as described above, SCS will also establish and maintain a dedicated page for the Settlement on its website at www.strategicclaims.net/Marex/, where key documents will be posted, including the Stipulation, the Notice Packet, and the executed Preliminary Approval Order. The website will also provide an overview of the case and proposed Settlement and will highlight important dates, including the date of the final approval hearing and the deadlines to submit a claim, request exclusion from the Settlement, or object to the Settlement. If there are any modifications to the time and/or date of the Settlement Hearing, SCS will update the website accordingly. All posted documents will be available for download from the website. SCS will update the Settlement website as necessary throughout the administration process.

16. SCS will also maintain a toll-free number throughout the administration of the Settlement to field potential Settlement Class Members' inquiries. During regular business hours, callers will be able to speak with a live operator. Callers who contact the toll-free telephone number outside regular business hours will be asked to leave a message for a return call. SCS will promptly respond to each telephone inquiry.

REACH OF NOTICE PROGRAM

17. Because the vast majority of class members in a securities class action like this are only known to the Nominees that held securities on their behalf and the absent class members, it is not possible to quantify the size of the proposed Settlement Class here with precision. However, through our experience in other securities settlements and within this industry, I am confident that the vast majority of class members here held through Nominees and that SCS has robust procedures for reaching those Nominees.

18. There were approximately 148 million reported shares of Marex Ordinary Shares traded on the Nasdaq during the Settlement Class Period. I estimate the number of Settlement Class Members in this matter who purchased Marex Ordinary Shares during the Settlement Class Period ranges from 30,000 to 50,000. I arrived at this estimate based on my experience in successfully administering over five hundred securities class action settlements. Each of these Settlement Class Members will be emailed the link to the electronic Notice Packet or mailed the Postcard Notice. The Settlement Class Members will be directed to file a claim in this matter, either online or by mailing a completed Claim Form to SCS.

19. In SCS's experience, not all class members submit claims, and some of the claims submitted are not valid or eligible to receive a distribution under the Plan of Allocation. In this case, Settlement Class Members will be eligible for a distribution only if they purchased Marex Ordinary Shares during the Settlement Class Period and held through the corrective disclosure. Accordingly, SCS estimates that approximately 27.5% of the Settlement Class Members (number of claims filed ranging from 8,250 to 13,750) will file claims. This estimate is based on my experience in administering hundreds of securities class action settlements; the approximately 148 million Marex Ordinary Shares traded on the Nasdaq during the Settlement Class Period; the institutional holders of Marex Ordinary Shares during the Settlement Class Period; as well as other factors.

20. In accordance with the Preliminary Approval Order, SCS will proceed according to the following timeline for the administration of the settlement up through the Claim Form Bar Date: within twenty (20) business days after entry of the Preliminary Approval Order, either mail the Postcard Notice or email the electronic Postcard Notice to all Settlement Class Members who can be identified with reasonable effort ("Notice Date"); within twenty (20) business days of entry

of the Preliminary Approval Order, establish the website www.strategicclaims.net/Marex/ and post the documents specified in paragraph 7.b. of the Preliminary Approval Order; within ten (10) business days after the Notice Date, publish the Summary Notice over *GlobeNewswire*; receive Claims as they are submitted; and perform the initial review of the submitted Claims received. After the Claim Form Bar Date has been reached, SCS will conduct quality assurance reviews of the submitted Claims, such as verifying that Claims include 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 cure their deficiencies, to the extent that their deficiencies may be cured. SCS will also notify any claimants whose Claims are determined to be ineligible. Once all of these processes are completed, SCS will notify Lead Counsel of its administrative decisions and request that those decisions be affirmed in the Class Distribution Order. Based on SCS's experience in other securities class action settlements of this size, SCS anticipates providing its administrative decisions to Lead Counsel within six months after the later of (i) the Claim Form Bar Date or (ii) the entry of the Final Judgment.

21. Based on its experience administering securities class action settlements with similar numbers of shareholders, SCS estimates that providing notice to the Settlement Class, claims processing, and distribution of the net Settlement proceeds to eligible Settlement Class Members will generate professional services fees and expenses of approximately \$75,000 as well as approximately \$3,000 in expected fees charged by brokers and nominees for providing names and addresses of potential Settlement Class Members to SCS, for emailing the link to the electronic Notice Packet to their clients, or for forwarding the Postcard Notice to their clients. The foregoing fees, expenses, and charges are based on the following estimates: an estimated 30,000 Settlement Class Members having purchased Marex Ordinary Shares during the Settlement Class Period; an

estimated 8,250 Claims received; reimbursement to brokers and nominees up to a maximum of \$0.02 per name, address, and email address provided to SCS, \$0.02 per notice sent by email, or \$0.02, plus postage at the current pre-sort rate, for Postcard Notices actually sent by brokers and nominees; the cost of publishing the Summary Notice by transmission over *GlobeNewswire*; the costs of establishing and maintaining the Settlement website and maintaining the toll-free phone line; the costs of undertaking the distribution to Authorized Claimants; and the amounts of Taxes and Tax Expenses.

22. Accordingly, SCS estimates that the total Notice and Administration Costs will be approximately \$78,000, which is approximately 8.2% of the proposed Settlement Amount. In SCS's experience, the notice process, claims process, and estimated fees and expenses outlined above are reasonable in relation to the value of the Settlement, and consistent with those incurred in other securities settlements of similar size and complexity.

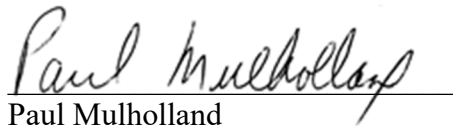
23. The foregoing amounts are estimates, and the ultimate cost of this administration could change if the number of notices sent is substantially greater (or smaller) than SCS's estimate or if the number of Claims received is substantially greater (or smaller) than the estimate. In addition, the costs of this administration could also be impacted by any out of scope work encountered during the course of the administration. SCS acknowledges that any fees or expenses in excess of the amounts specified in the Stipulation for Notice and Administration Costs shall be subject to Court approval. SCS will always strive to keep costs down whenever possible.

24. In the vast majority of the securities class action cases that SCS has administered, distribution has been made to authorized claimants who would be eligible to receive at least a \$10.00 payment; payments are not made to those claims which would receive less than a \$10.00 payment, with the funds from those claims being included in the amount to be distributed to claims

which meet the \$10.00 payment threshold. This threshold has been applied in numerous recent cases that SCS has administered in the Southern District of New York, including *In re AppHarvest Inc., Securities Litigation*, Case No. 1:21-cv-7985-LJL (S.D.N.Y.), *Brennan v. Latch, Inc. et. al.*, Case No. 1:22-cv-07473-JGK (S.D.N.Y.), *In re Y-mAbs Therapeutics, Inc. Securities Litigation*, No. 1:23-cv-00431-AS (S.D.N.Y.). In SCS's experience, settlements which do not have a minimum distribution amount incur additional distribution costs while attaining less robust check clearance due to small dollar-amount checks remaining uncashed. Having a \$10.00 minimum distribution for this Settlement would save on the fees and expenses that would otherwise come with distributing to small dollar amounts—such as increased check-printing costs, increased postage for check mailing, fees for follow-up work to encourage check cashing, and additional cancellation and reissuance costs.

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

Executed on 20th day of August 2026 at Media, Pennsylvania.


Paul Mulholland

PROOF OF SERVICE

I hereby certify that on this 20th day of August, 2026, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/ William M. Brody
William M. Brody

EXHIBIT A

PAUL MULHOLLAND, CPA
(CURRICULUM VITAE)

Mr. Mulholland is the President and founder of Strategic Claims Services (SCS) in April of 1999. SCS is a litigation support firm specializing in the administration of class action cases and in providing damages analyses in class action matters. SCS has administered over 500 class action settlements and calculated over 150 damage analyses since its inception. The Company also specializes in the preparation and compliance of federal and state income taxes for Qualified Settlement Funds. For more information on SCS visit its website at www.strategicclaims.net.

From 1992 to 1999, Mr. Mulholland was Senior Vice President of Valley Forge Administrative Services, Inc. Mr. Mulholland was responsible for overseeing all aspects preparation of damage/expert reports in class action matters and for claims processing and administration of class action settlements. He also was responsible for areas of federal and state income taxes for settlement funds and for compliance with all treasury regulations.

From 1986 to 1992, Mr. Mulholland was Chief Financial Officer of Terramics Property Company, a Philadelphia-based regional commercial real estate company with a \$150 million real estate portfolio. He was responsible for asset management, financial reporting, budgets, bank and investor liaison, debt restructurings, refinancings, contract negotiations, tax matters, treasury functions and cash management.

From 1984 to 1986, Mr. Mulholland was Chief Financial Officer of American Health Systems, Inc., a \$40 million (revenue) nursing home management company, and was responsible for financial reporting, taxation, budgeting, cash management, cost containment, risk management and regulatory reporting.

From 1980 to 1984, Mr. Mulholland was employed at Coopers & Lybrand. He planned and directed audit engagements in a variety of industries, including preparation of financial statements, SEC reporting, and evaluation of internal accounting systems and supervision of staff accountants.

Mr. Mulholland holds a BS in Accounting from Wheeling Jesuit University and is a Certified Public Accountant and a member of the AICPA. He serves on several advisory boards and board of directors for several companies in the Philadelphia area. Mr. Mulholland was an adjunct professor of accounting and finance at Neumann University located in Aston, PA.

PAUL MULHOLLAND, CPA
EXPERT TESTIMONY AND DEPOSITIONS

Expert Testimony:

Celia L. Hale, et al., v. Wal-Mart Stores, Inc
Jackson County, Missouri
Case No. 01-CV-218710 (Division 1)

June 2008

Jitendra V. Singh v. vCustomer Corporation, et al.
Eastern District of Pennsylvania
Civil Action No. 03-4439

June 2004

Barter v. Southmoore Golf Associates
(Common Pleas of Northhampton County (No. 199-C-1815)

March 21, 2000 and
March 22, 2000

Pearl and Hoffman v. Geriatric & Medical Center, Inc (Eastern
District of Pennsylvania (No.92-CV-5113 and No.93-CV-2129)

March 1995

Depositions:

Fosamax Products
Liability Litigation No. 1:06-MD-1789 (JFK)
(MDL No. 1789)
USDC for the Southern District of New York

June 14, 2007

Aredia and Zometa Products
Liability Litigation No. 3:06-MD-1760
(MDL No. 1760)
USDC for the Middle District of Tennessee
at Nashville

May 31, 2007

Jitendra V. Singh v. vCustomer Corporation, et al.
Eastern District of Pennsylvania
Civil Action No. 03-4439

June 2004

In Re: Curative Health Services, Inc. Securities Litigation
(Master File No. CV99-2074) United States District Court
Eastern District of New York

February 2002

Pearl and Hoffman v. Geriatric & Medical Center, Inc (Eastern
District of Pennsylvania (No.92-CV-5113 and No.93-CV-2129)

January 1995

Mediation Presentation:

Alibaba Group Holding Limited Securities Litigation
Civil Action 1:15-md-02361 (CN)
USDC Southern District of New York
Mediation Presentation to Honorable Layne R Phillips

March 2019

EXHIBIT B

SUMMARY

SCS Experience and Qualifications

SCS has administered over 750 class action settlements involving the distribution of over \$4 billion in settlement/judgment funds, and the management of more than 4 million claims with mailings of notices to over 50 million potential class members. SCS was founded in 1999 by Paul Mulholland and is headquartered outside of Philadelphia. SCS is a rapidly growing class action claims administrator that manages, plans, implements, and administers court approved class action settlements involving securities and investment fraud, ERISA violations, wage and employment abuses, data breach and other consumer injuries. With a 26-year track record and is ranked as one the top notice and claims administrators in the class action industry. SCS is a well-known and highly regarded notice and claims administrator. The Company offers (i) pre-settlement valuation and damage assessments, (ii) plans of allocation/distribution of settlement funds, (iii) notice and publication media campaigns (both physical and digital), (iv) data management and claims evaluations, (v) class member qualification and quality assurance, (vi) reporting and affidavits, (vii) settlement fund escrow, distribution and account reconciliation, and (viii) tax reporting. against us in any manner. Please visit our website at www.strategicclaims.net.

Quality Assurance

SCS has never had a claim filed against it. This is the result of our strong quality control procedures. SCS operates like a large public accounting firm where a staff member, supervisor, manager and executive are all involved in reviewing claims. Our quality control department will then perform statistical sampling and other procedures in reviewing claims before signing off. Besides setting up the database to detect inconsistencies, our fraud prevention procedures consist of several steps including a sampling of claims to verify authenticity. SCS often communicates with the FBI and DOJ to share any fraudulent activity and to update a list of fraudulent claimants from previous cases.

SCS has a variety of security measures in place to ensure all personal information is kept safe and secure. These measures include, but are not limited to, SSL encryption of all data submitted through our website; internal monitoring of all computer usage by employees; live antivirus scanning of all files received/sent along with weekly updates and scanning of all servers and computers on our network; password protected and restricted access for employees working with personal data; use of a monitored and secure VPN for remote access; daily, weekly and monthly backups to secure offsite storage; and 24/7 notifications to immediately address any irregularities.

ESTD



1999

STRATEGIC CLAIMS SERVICES

OUR MISSION

Unlock the Benefits *of Strategic Claims*

Strategic Claims Services strives to offer high quality claims administration and unmatched solutions to its clients while maintaining exceptional client relationships.

-  We tailor each process to meet legal, case, and class needs—making sure everything is accurate, efficient, and clearly communicated.
-  Our team has deep experience handling everything from complex disputes to simpler cases.
-  Our Project Managers handle every part of your administration and are always accessible, even answering calls directly.
-  We take a consultative approach, providing tailored reports, real-time alerts, and thorough reviews. Our team works closely with you to anticipate and resolve issues, ensuring a clear and accurate claims process.

700+

Class action settlements

4M

Claims managed

\$4B

In settlement/judgment funds

ABOUT US

Over Two Decades of Successful Claims Administration

Strategic Claims Services (SCS) was established in 1999 to provide support in managing, planning, implementing and administering class action litigations. With over two decades of experience, SCS develops a custom solution for each and every client to ensure the highest quality service at a competitive price.

As an innovator in claims administration services, SCS is a technology driven organization with a proven track record to handle cases of all sizes in a cost-effective and efficient manner. The firm also provides tailored proposals, data management, and consultation.



Paul Mulholland

CEO & FOUNDER

As the founder, Mr. Mulholland is the key liaison with counsel on administrative cases. He holds a BS degree in Accounting from Wheeling University and is a Certified Public Accountant (inactive) and a member of the AICPA. Mr. Mulholland has over thirty years of experience in all areas of notice and claims administration. He has administered over 700 class action settlements representing billions of dollars of settlement funds.



Past Cases

CONTACT US



Ryan Schley, Esq.

VICE PRESIDENT OF SALES

P 484.282.2803

E rschley@strategicclaims.net

In re Vanguard Chester Funds Litigation
No. 2:22-cv-00955-JFM.

Settlement fund of \$50M. Notice by
mail to 313K class members resulting in
212K claims processed.

Ferguson, et al. v. Ruane, Cunniff &
Goldfarb Inc., et al., No. 1:17-cv-06685-
ALCBM (S.D.N.Y.)

ERISA Settlement Fund of \$124 Million.
Over 15K claims processed.

Friel v. Dapper Labs, Inc., et al., Case No.
1:21-cv-05837-VM.

Notice to over 680K class members
resulting in over 30K claims processed.

Tewin et al. v. Church & Dwight, Inc.
No. 3:12-cv-01475-MAS-DEA.

Publication Notice resulting in 70K
claims processed.

EXHIBIT C

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**Southern District of New York Cases
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<i>Lin v. Liberty Health Sciences, et al.</i> Case No. 1:19-cv-00161-MKV-SLC
<i>Rosi v. Aclaris Therapeutics, Inc. Securities Litigation</i> Case No. 1:19-cv-7118-LJL
<i>Nicholas Skiadas v. Acer Therapeutics Inc., et. al.</i> Case No. 1:19-cv-06137-GHW
<i>Hawaii Structural Ironworkers Pension Trust Fund v. AMC Entertainment Holdings, Inc., et al.,</i> Case No. 1:18-cv-00299-AJN
<i>Moshell v. Sasol Limited, David Edward Constable, Bongani Nqwababa, Stephen Cornell, Paul Victor, and Stephan Schoeman</i> Case No. 1:20-cv-01008-JPC
<i>Kristal v. Mesoblast Limited, et al.</i> Case No. 7:20-CV-08430-PMH
<i>Nolff, et al., v. Aterian, Inc., et al.</i> Case No. 1:21-cv-04323-VM
<i>In re Mindbody Inc. Securities Litigation</i> Case No. 1:19-cv-08331-VEC
<i>In re Sundial Growers Inc. Securities Litigation</i> Master File No. 1:19-cv-08913-ALC
<i>In re Changyou.com Limited Securities Litigation</i> Case No. 1:21-cv-07858-GHW
<i>Plumbers & Pipefitters National Pension Fund, et al. v. Kevin Davis and Amir Rosenthal</i> Case No. 1:16-cv -3591-GHW
<i>In re Loop Industries, Inc. Securities Litigation</i> Case No. 7:20-cv-08538-NSR
<i>In re Peabody Energy Corp. Securities Litigation</i> Case No. 1:20-cv-08024-PKC
<i>In re Omega Healthcare Investors, Inc. Securities Litigation</i> Case No. 1:17-cv-08983-NRB
<i>In re Pareteum Securities Litigation</i> Case No. 1:19-cv-09767-AKH-GWG
<i>In re Global Brokerage, Inc. f/k/a FXCM Inc. Securities Litigation</i> Master File No. 1:17-cv-00916-RA-BCM
<i>Castillo Iv v. 6D Global Technologies, Inc., et al.</i> Case No. 15-cv-8061-DLC
<i>In re Tufin Software Technologies Ltd. Securities Litigation</i> Master File No. 1:20-cv-5646-GHW
<i>In re AppHarvest Securities Litigation</i> Case No. 1:21-cv-07985-LJL
<i>In re Y-mAbs Therapeutics, Inc. Securities Litigation</i> Civil Action No. 1:23-cv-00431-AS

<i>Fung v. Sunlight Financial Holdings Inc., et al.</i> Case No. 1:22-cv-10658-AKH
<i>Winter v. Stronghold Digital Mining Inc. et al.</i> Case No. 1:22-cv-03088-RA
<i>Brennan v. Latch, Inc, et al.</i> Case No. 1:22-cv-07473-JGK
<i>In re GigaCloud Technology Inc. Securities Litigation</i> Case No. 1:23-cv-10645-JMF
<i>In re Axsome Therapeutics, Inc. Securities Litigation</i> Case No. 1:22-cv-3925-LGS
<i>In re DiDi Global Inc. Securities Litigation</i> Case No. 1:21-cv-05807-LAK-VF
<i>In re Hub Cyber Security Ltd</i> Case No. 1:23-cv-05764-AS
<i>In re VEON Ltd. Securities Litigation</i> Case No. 1:15-cv-08672-ALC-OTW
<i>zCap Equity Fund LLC and Ross Marchetta v. LuxUrban Hotels Inc.</i> Case No. 1:24-cv-01030-PAE
<i>In re VNET Group, Inc. Securities Litigation</i> Case No. 1:23-cv-11187-DEH