

HAGENS BERMAN SOBOL SHAPIRO LLP

Steve W. Berman (admitted *pro hac vice*)
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com

*Counsel for Lead Plaintiff Ilya Trubnikov and
Lead Counsel for the Settlement Class*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

John Rizio-Hamilton (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
johnr@blbglaw.com

*Counsel for Lead Plaintiff Roofers' Pension
Fund and Lead Counsel for the Settlement Class*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLANTRONICS, INC.
SECURITIES LITIGATION

No. 4:19-cv-07481-JST

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF
LUIGGY SEGURA REGARDING:
(A) UPDATE ON DISSEMINATION OF
NOTICE PACKET; (B) UPDATE ON
CALL CENTER SERVICES AND
SETTLEMENT WEBSITE;
(C) REQUESTS FOR EXCLUSION
RECEIVED; (D) AND CLAIMS
RECEIVED TO DATE**

1 I, LUIGGY SEGURA, declare as follows:

2 1. I am the Vice President of Securities Operations at JND Legal Administration
3 (“JND”). Pursuant to the Court’s February 10, 2025 Order Preliminarily Approving Settlement
4 and Authorizing Dissemination of Notice As Modified (ECF No. 240) (the “Preliminary Approval
5 Order”), JND was appointed to supervise and administer the notice procedure as well as the
6 processing of claims in connection with the Settlement of the above-captioned action (the
7 “Action”).¹ I am over 21 years of age and am not a party to the Action.

8 2. I submit this declaration as a supplement to my previously filed declaration, the
9 Declaration of Luiggy Segura Regarding: (A) Mailing of the Notice and Claim Form;
10 (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received to
11 Date, dated April 25, 2025 (ECF No. 243-4) (the “Initial Mailing Declaration”). The following
12 statements are based on my personal knowledge and information provided to me by other
13 experienced JND employees, and, if called as a witness, I could testify competently thereto.

14 **UPDATE ON DISSEMINATION OF THE NOTICE PACKET**

15 3. Since the initial mailing of Notice Packets on February 25, 2025 (the “Initial
16 Mailing”), JND has undertaken substantial efforts to ensure that brokers/nominees responded in a
17 timely manner either by providing JND with the names and addresses of potential Class Members
18 or by requesting notices, in bulk, to forward directly onto their clients. To that end, JND caused
19 reminder postcards to be mailed to the brokers/nominees and third-party filers who did not respond
20 to the Initial Mailing, advising these entities of their obligation to facilitate notice of the Settlement
21 to their clients who purchased Plantronics common stock during the Class Period. JND also
22 reached out via telephone and email to the top 100 brokers/nominees and third-party filers.

23 4. Since the Initial Mailing, JND has continued to disseminate copies of the Notice
24 Packet in response to requests from potential Settlement Class Members and brokers/nominees.
25
26

27 _____
28 ¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the
Stipulation and Agreement of Settlement dated July 18, 2024 (ECF No. 230-1) (the “Stipulation”).

1 As of July 8, 2025, a total of 22,299 Notice Packets have been mailed to potential Settlement Class
2 Members by JND and broker/nominees.

3 5. As of July 8, 2025, 416 Notice Packets had been returned to JND by the United
4 States Postal Service (“USPS”) as undelivered as addressed. The USPS provided an updated
5 address for 97 of the undelivered Notice Packets and JND or the USPS forwarded the Notice
6 Packets to the updated addresses. In addition, JND re-mailed 92 Notice Packets to updated
7 addresses located by JND through advanced address searches. A total of 227 Notice Packets
8 addressed to potential Settlement Class Members could not be delivered. This number of
9 undeliverable notices—which represents less than 1.1% of the total number of Notice Packets
10 mailed—is lower than the rate of undeliverable notices typically seen in comparable class actions.
11 *See In re Yahoo! Inc. Sec. Litig.*, Case No. 5:17-cv-00373-LHK, Post-Distribution Accounting
12 (N.D. Cal. Apr. 17, 2020), ECF No. 160 (2.4% of notices were undeliverable); *In re RH, Inc. Sec.*
13 *Litig.*, Case No. 4:17-00554-YGR, Post-Distribution Accounting (N.D. Cal. Apr. 2, 2020), ECF
14 No. 131 (1.7% of notices were undeliverable); *In re RH, Inc. Sec. Litig.*, Case No. 4:17-00554-
15 YGR, Suppl. Miller Decl. (N.D. Cal. Oct. 15, 2019), ECF No. 147-4 (citing three cases in which
16 the undeliverable rate ranged from 2% to 5%).

17 **UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE**

18 6. JND continues to maintain the toll-free telephone number (855-680-9512) and
19 Interactive Voice Recording (“IVR”) to accommodate inquiries about the Settlement from
20 potential Class Members. JND has promptly responded to each telephone inquiry and will continue
21 to respond to Class Member inquiries via the toll-free telephone number.

22 7. JND also continues to maintain the website dedicated to the Settlement,
23 www.PlantronicsSecuritiesLitigation.com (the “Settlement Website”), to assist potential
24 Settlement Class Members. On April 25, 2025, JND posted to the Settlement Website copies of
25 the papers regarding Lead Counsel’s motion for attorneys’ fees and litigation expenses. JND will
26 continue operating, maintaining and, as appropriate, updating the Settlement Website until the
27 conclusion of the administration of the Settlement.
28

REQUESTS FOR EXCLUSION RECEIVED

8. The Notice, Summary Notice, and Settlement Website informed potential Settlement Class Members that requests for exclusion from the Class were to be sent to JND, such that they are received no later than June 25, 2025. JND has monitored all mail delivered to the P.O. Box for the Settlement. As of the date of this Declaration, JND has not received any requests for exclusion.

CLAIMS RECEIVED TO DATE

9. The Notice and Claim Form also informed potential Settlement Class Members that if they wished to participate in the Settlement that they must timely complete and return the Claim Form with adequate supporting documentation postmarked or submitted online no later than June 25, 2025.

10. As of July 8, 2025, JND has received approximately 15,400 claims. This Claim count may increase if JND receives additional timely Claims that were postmarked on or before June 25, 2025, but that have not yet been received due to the time needed for mail delivery. In addition, the Claim count may increase if late Claims are received during the processing of timely submitted Claims and the acceptance of these Claims would not delay a future distribution. Lead Counsel has the discretion to accept late Claims for processing provided such acceptance does not delay the distribution of the Net Settlement Fund to the Settlement Class, *see* Preliminary Approval Order, ¶ 11, and the Court will ultimately determine whether to accept such Claims.

11. Based on JND's preliminary analysis, 7,612 of these Claims appear to be eligible under the Plan of Allocation. The eligible claims represent a total of approximately 18,807,588 damaged shares (that is, shares that purchased during the Class Period and held over a corrective disclosure that may be eligible for payment under the Settlement). Based on JND's preliminary analysis, the total Recognized Claims for all claims received is approximately \$206,519,700. Approximately 98% of the total number of claims, and approximately 99% of the total number of damaged shares represented by those claims, have been filed by institutional investors or third-party filers.

12. The above data was obtained through JND's preliminary review of the Claims received, based on the information provided by Claimants with their Claims. Some of the submitted Claims contain deficiencies, and Claimants have not yet been given an opportunity to correct their deficiencies. Additionally, not all Claims have been fully audited and reviewed for accuracy or validity. The complete processing of these Claims will take additional months. This process will include steps to confirm the accuracy of the transactions claimed and a review of the Claims for deficiencies, such as missing or incomplete documentation, duplicate submissions, and claimed transactions that do not balance (*i.e.*, where the number of shares held at the beginning of the Class Period plus purchases/acquisitions during the relevant time period do not match the number of shares sold during the relevant time period plus the number of shares held at the end of the period). JND will also provide Claimants with an opportunity to correct any deficiencies in their Claims, will conduct thorough quality control and quality assurance processes, and will perform fraud prevention reviews as part of its normal claims processing procedures in order to ensure the validity and accuracy of all Claims. As a result of these procedures, the number of valid Claims and the damaged shares and Recognized Claims in the Claims received is subject to change.

I declare under penalty of perjury under that the foregoing is true and correct.
Executed this 9th day of July, 2025.



LUIGGY SEGURA