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[Additional Counsel Appear on Signature Page]

*Lead Counsel for Lead Plaintiffs and the Settlement
Class*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE HP INC. SECURITIES LITIGATION

Case No. 3:20-cv-01260-SI

CLASS ACTION

**REPLY MEMORANDUM OF
POINTS AND AUTHORITIES IN
FURTHER SUPPORT OF (I) LEAD
PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF SETTLEMENT AND
PLAN OF ALLOCATION, AND
(II) LEAD COUNSEL'S MOTION
FOR ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Judge: Hon. Susan Illston
Date: July 28, 2023
Time: 10:00 a.m.

Lead Plaintiffs the State of Rhode Island, Office of the General Treasurer, on behalf of the Employees' Retirement System of Rhode Island, and Iron Workers Local 580 Joint Funds (together, "Lead Plaintiffs"), on behalf of themselves and the Settlement Class, and Lead Counsel respectfully submit this reply memorandum of points and authorities in further support of (i) Lead Plaintiffs' motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation (ECF No. 130), and (ii) Lead Counsel's motion for attorneys' fees and Litigation Expenses (ECF No. 131) (together, the "Motions").¹

INTRODUCTION

As detailed in Lead Plaintiffs’ and Lead Counsel’s opening papers in support of the Motions filed on June 23, 2023 (ECF Nos. 130-32), the proposed Settlement—providing for a \$10.5 million cash payment in exchange for the resolution of all claims asserted in the Action against Defendants—is a favorable result for the Settlement Class. The Settlement takes into account the significant risks, complexities, and expense of continued litigation and is the result of extensive arm’s-length negotiations between experienced counsel and ultimately, a mediator’s proposal to resolve the Action. Likewise, Lead Counsel’s request for an 18% fee—a request substantially below the Ninth Circuit’s 25% benchmark award—and payment of Litigation Expenses is also fair and reasonable, especially considering the result achieved for the Settlement Class, the caliber of work performed, the risks of litigation, and comparable fee and expense awards.

Now that the time for objecting or requesting exclusion from the Settlement Class has passed, the reaction of the Settlement Class provides additional support for approval of the Settlement and fee and expense application. Notably, following an extensive Court-approved notice program—including the mailing of the Postcard Notice to over 665,000 potential

¹ Unless otherwise defined in this memorandum, all capitalized terms shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated March 2, 2023 (ECF No. 118-1), or in the Joint Declaration of Jennifer L. Joost and Jeremy P. Robinson in Support of (I) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses, dated June 23, 2023 (ECF No. 132).

1 Settlement Class Members and Nominees—not a single member of the Settlement Class has
 2 objected to any aspect of the Settlement, the Plan of Allocation, or the requested attorneys’ fees
 3 and Litigation Expenses. The absence of objections is especially noteworthy here because
 4 institutional investors held the majority of HP common stock during the Class Period—and, even
 5 though such investors have the staff and resources to object if they believe it is warranted, none
 6 did so. Further, not a single institutional investor has requested exclusion from the Settlement
 7 Class and only 35 requests for exclusion from individuals were received. The shares reported by
 8 these exclusion requests represent a miniscule fraction (roughly 0.0006%) of the total number of
 9 damaged shares eligible to participate in the Settlement.²

10 As explained below, the positive reaction of the Settlement Class further supports a
 11 finding that the proposed Settlement, Plan of Allocation, and request for attorneys’ fees and
 12 Litigation Expenses are all fair and reasonable—and should be approved.

13 **ARGUMENT**

14 Lead Plaintiffs and Lead Counsel respectfully submit that their opening papers
 15 demonstrate that approval of the Motions is warranted. Now that the time for objecting or
 16 requesting exclusion from the Settlement Class has passed, the reaction of the Settlement Class,
 17 including the lack of any objections by Settlement Class Members, provides additional support
 18 for the Court’s approval of the Motions.

19 **I. The Robust Court-Approved Notice Program**

20 In accordance with the Court’s Preliminary Approval Order (ECF No. 124), the Claims
 21 Administrator, A.B. Data, Ltd. (“A.B. Data”), conducted an extensive notice program under Lead
 22 Counsel’s supervision. The notice program included mailing the Postcard Notice to potential
 23 Settlement Class Members and Nominees, publishing the Summary Notice in *The Wall Street*

24
 25 ² The Parties agree that certain of the requests for exclusion received are invalid under the
 26 terms of the Stipulation. Specifically, of the 35 requests for exclusion received, 17 requests for
 27 exclusion included transactional information as required by the Notice (“Valid Exclusions”) and
 28 18 requests for exclusion did not include transactional information as required by the Notice
 (“Invalid Exclusions”). *See* Supplemental Declaration of Jack Ewashko (“Supp. Ewashko
 Decl.”), ¶ 8. All 35 requests for exclusion are attached to the Supp. Ewashko Decl.

1 *Journal* and over *PR Newswire*, and creating a case website, www.HPSecuritiesSettlement.com,
 2 where copies of the Notice and Claim Form and other information and documents related to the
 3 Settlement could be accessed.

4 A.B. Data began mailing the Postcard Notice to potential Settlement Class Members on
 5 April 28, 2023. *See* ECF No. 132-4, ¶¶ 3-4.³ As of July 20, 2023, A.B. Data has mailed a total of
 6 665,051 Postcard Notices to potential Settlement Class Members and Nominees. *See* Supp.
 7 Ewashko Decl., ¶ 2. Of that number, 18,278 or 2.7%, were returned as undeliverable, with no
 8 alternative address found. *Id.*, ¶ 3. This rate is consistent with (or lower than) comparable notice
 9 programs. *Id.*

10 The Summary Notice, which informed readers of the proposed Settlement, how to obtain
 11 copies of the Notice and Claim Form, and the deadlines for the submission of Claims, objections,
 12 and requests for exclusion, was published in *The Wall Street Journal* and released over
 13 *PR Newswire* on May 19, 2023. ECF No.132-4, ¶ 10.

14 The notices informed Settlement Class Members of the terms of the proposed Settlement
 15 and that Lead Counsel would apply for an award of attorneys' fees in an amount not to exceed
 16 18% of the Settlement Fund and for Litigation Expenses not to exceed \$250,000. *See* Postcard
 17 Notice; Summary Notice; Notice at p. 2 & ¶ 46. The notices also advised Settlement Class
 18 Members of their right to request exclusion from the Settlement Class or object to the proposed
 19 Settlement, the Plan of Allocation, and/or the request for attorneys' fees and Litigation Expenses,
 20 and the July 7, 2023 deadline for doing so. *See* Postcard Notice; Summary Notice; Notice at p. 3
 21 & ¶¶ 48-49, 55-58.

22 On June 23, 2023, 14 days before the objection and exclusion deadline, Lead Plaintiffs
 23 and Lead Counsel filed their detailed opening papers in support of the Settlement, Plan of
 24 Allocation, and fee and Litigation Expense request. These papers are available on the public
 25

26 ³ A.B. Data also mailed the Notice and Claim Form to Nominees as well as potential
 27 Settlement Class Members upon request (*id.*, ¶¶ 4, 7) and sent emails (with content similar to the
 28 text of the Postcard Notice) to potential Settlement Class Members where an email address was
 provided (*id.*, ¶ 9).

docket (ECF Nos. 130-132), and were promptly posted to the case website, Supp. Ewashko Decl., ¶ 5.⁴

As noted above, following this extensive Court-approved notice program, not a single Settlement Class Member has objected to any aspect of the proposed Settlement, the Plan of Allocation, or Lead Counsel’s application for attorneys’ fees and Litigation Expenses. In addition, only 35 requests for exclusion from the Settlement Class have been received. Supp. Ewashko Decl., ¶ 7 & Ex. 1. All 35 requests received were submitted by individual shareholders. Collectively, the individuals requesting exclusion reported purchasing fewer than 4,742 shares of HP common stock allegedly damaged by Defendants’ alleged misconduct—roughly 0.0006% of the total number of allegedly damaged shares as estimated by Lead Plaintiffs’ damages expert.

II. The Reaction of the Settlement Class Supports Approval of the Settlement, the Plan of Allocation, and the Motion for Attorneys’ Fees and Expenses

The Ninth Circuit instructs district courts to consider the reaction of the class in determining whether to approve a class action settlement. *See Churchill Vill., L.L.C. v. Gen. Elec.*, 361 F.3d 566, 575 (9th Cir. 2004). Moreover, “[i]t is established that the absence of a large number of objections to a proposed class action settlement raises a strong presumption that the terms of a proposed class settlement action are favorable to the class members.” *Nat’l Rural Telecomms. Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 529 (C.D. Cal. 2004).

Here, the absence of *any* objections along with the low number of requests for exclusion supports a finding that the proposed Settlement is fair, reasonable, and adequate. *See, e.g., Vataj v. Johnson*, 2021 WL 5161927, at *7 (N.D. Cal. Nov. 5, 2021) (“[T]he absence of a large number of objections to a proposed class action settlement raises a strong presumption that the terms of a proposed class settlement action are favorable to the class members.”) (alteration in original); *Taafua v. Quantum Glob. Techs., LLC*, 2021 WL 579862, at *7 (N.D. Cal. Feb. 16, 2021) (“The

⁴ The Notice informed Settlement Class Members that Lead Counsel would file their papers in support of their motion for attorneys’ fees and Litigation Expenses on June 23, 2023, and that those papers would be made available on the Settlement Website. Notice ¶ 47.

lack of objections and low number of requested exclusions . . . indicates support among the class members and weighs in favor of approving the settlement.”); *Giroux v. Essex Prop. Tr., Inc.*, 2019 WL 2106587, at *5 (N.D. Cal. May 14, 2019) (“The Court finds that the absence of objections and very small number of opt-outs indicate overwhelming support among the Class Members and weigh in favor of approval.”); *Destefano v. Zynga, Inc.*, 2016 WL 537946, at *13 (N.D. Cal. Feb. 11, 2016) (“By any standard, the lack of objection of the Class Members favors approval of the Settlement.”); *In re Apollo Grp. Inc. Sec. Litig.*, 2012 WL 1378677, at *3 (D. Ariz. Apr. 20, 2012) (“There have been no objections from Class Members or potential class members, which itself is compelling evidence that the Proposed Settlement is fair, just, reasonable, and adequate.”).

Moreover, it is especially significant that no institutional investors—which held the majority of HP’s publicly traded common stock during the Class Period—have objected to the Settlement or requested exclusion from the Settlement Class. The absence of objections (and exclusion requests) in response to the proposed Settlement from these institutional investors, which have ample means and incentive to object to the Settlement if they deemed it unsatisfactory, is further evidence of the Settlement’s fairness. *See, e.g., In re Extreme Networks, Inc. Sec. Litig.*, 2019 WL 3290770, at *9 (N.D. Cal. July 22, 2019) (“Many potential class members are sophisticated institutional investors; the lack of objections from such institutions indicates that the settlement is fair and reasonable.”); *In re Facebook, Inc. IPO Sec. & Derivative Litig.*, 343 F. Supp. 3d 394, 410 (S.D.N.Y. 2018) (“That not one sophisticated institutional investor objected to the Proposed Settlement is indicia of its fairness.”); *In re Cathode Ray Tube (CRT) Antitrust Litig.*, 2017 WL 2481782, at *4 (N.D. Cal. June 8, 2017) (the absence of any objections from institutions means that “the inference that the class approves of the settlement is even stronger”); *In re AT&T Corp. Sec. Litig.*, 2005 WL 6716404, at *4 (D.N.J. Apr. 25, 2005) (the reaction of the class “weigh[ed] heavily in favor of approval” where “no objections were filed by any institutional investors who had great financial incentive to object”).

The lack of objections from Settlement Class Members also supports approval of the proposed Plan of Allocation. *See, e.g., In re Heritage Bond Litig.*, 2005 WL 1594403, at *11

(C.D. Cal. June 10, 2005) (“The fact that there has been no objection to this plan of allocation favors approval of the Settlement.”); *Patel v. Axesstel, Inc.*, 2015 WL 6458073, at *7 (S.D. Cal. Oct. 23, 2015) (approving plan of allocation where “no class members objected”); *In re Veeco Instruments Inc. Sec. Litig.*, 2007 WL 4115809, at *14 (S.D.N.Y. Nov. 7, 2007) (“[N]ot one class member has objected This favorable reaction of the Class supports approval of the Plan of Allocation.”).

Likewise, the absence of any objections to Lead Counsel’s motion for attorneys’ fees and expenses supports a finding that the fee and expense request is fair and reasonable. *See, e.g., Acosta v. Frito-Lay, Inc.*, 2018 WL 2088278, at *12 (N.D. Cal. May 4, 2018) (“The absence of objections or disapproval by class members . . . supports the finding that Plaintiffs’ request is reasonable.”); *Destefano*, 2016 WL 537946, at *18 (“[T]he lack of objection by any Class Members” supported the fee requested.); *In re Nuvelo, Inc. Sec. Litig.*, 2011 WL 2650592, at *3 (N.D. Cal. July 6, 2011) (finding only one objection to the fee request to be “a strong, positive response from the class, supporting an upward adjustment of the benchmark [fee award]”); *Heritage Bond*, 2005 WL 1594403, at *21 (“The absence of objections or disapproval by class members to Class Counsel’s fee request further supports finding the fee request reasonable.”).

As with approval of the proposed Settlement, the lack of objections by institutional investors in particular supports approval of the fee request. *See In re Rite Aid Corp. Sec. Litig.*, 396 F.3d 294, 305 (3d Cir. 2005) (fact that “a significant number of investors in the class were ‘sophisticated’ institutional investors that had considerable financial incentive to object had they believed the requested fees were excessive,” but did not do so, supported approval of the fee request); *In re Bisy Sec. Litig.*, 2007 WL 2049726, at *1 (S.D.N.Y. July 16, 2007) (noting that there was only one objection from an individual—and none from any institutions—“even though the class included numerous institutional investors who presumably had the means, the motive, and the sophistication to raise objections if they thought the [requested] fee was excessive”).

III. Claims Received to Date

As of July 20, 2023, A.B. Data has received 6,830 Claims, either by mail or electronically via the Settlement Website. *See Supp. Ewashko Decl.*, ¶ 9. The deadline for submitting Claims is

August 14, 2023. In A.B. Data's experience, the large majority of claimants submit their claims at or shortly before the deadline. *Id.*

CONCLUSION

For the foregoing reasons and the reasons set forth in their opening papers, Lead Plaintiffs and Lead Counsel respectfully request that the Court approve the Settlement, the Plan of Allocation, and the motion for attorneys' fees and Litigation Expenses. Copies of the (i) proposed Judgment,⁵ (ii) proposed Order Approving Plan of Allocation of Net Settlement Fund, and (iii) proposed Order Awarding Attorneys' Fees and Litigation Expenses are filed herewith and submitted in Word format to Your Honor's email.

Dated: July 21, 2023

Respectfully Submitted,

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

/s/ Jennifer L. Joost

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-and-

⁵ As submitted, Exhibit 1 to the Judgment lists the names (along with city and state) of the 17 individuals who submitted Valid Exclusions and excludes them from the Settlement Class. As discussed above, the Parties agree that 18 of the requests for exclusion received are invalid under the terms of the Stipulation because they failed to include the required transactional information. If the Court determines that all 35 requests for exclusion should nevertheless be accepted as valid, the individuals listed in Exhibit 2 to the Supp. Ewashko Decl. should be added to the list set forth in Exhibit 1 so that they too are excluded from the Settlement Class. Although Lead Plaintiffs agree that the 18 requests set forth in Exhibit 2 to the Supp. Ewashko Decl. are technically invalid, they will not object if the Court decides to accept them and exclude those individuals from the Settlement Class.

⁶ In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that concurrence in the filing of this document has been obtained from the signatories.

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behalf of the Employees' Retirement System of
Rhode Island and Co-Lead Counsel for the
Settlement Class*

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580 Joint Funds and Co-Lead Counsel for the
Settlement Class*

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*Lead Counsel for Lead Plaintiffs and
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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE HP INC. SECURITIES LITIGATION

Case No. 3:20-cv-01260-SI

CLASS ACTION

**SUPPLEMENTAL
DECLARATION OF JACK
EWASHKO REGARDING:
(A) CONTINUED
DISSEMINATION OF NOTICE;
(B) REPORT ON REQUESTS
FOR EXCLUSION RECEIVED;
AND (C) REPORT ON CLAIMS
RECEIVED TO DATE**

Judge: Hon. Susan Illston
Date: July 28, 2023
Time: 10:00 a.m.

JACK EWASHKO, declares as follows:

1. I am a Client Services Director of A.B. Data, Ltd.’s Class Action Administration Company (“A.B. Data”). Pursuant to the Court’s April 7, 2023 Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 124) (“Preliminary Approval Order”), the Court approved the retention of A.B. Data as Claims Administrator in connection with the proposed Settlement of the above-captioned Action.¹ I submit this Declaration as a supplement to my previously filed declaration, the Declaration of Jack Ewashko Regarding (A) Dissemination of Postcard Notice and Notice Packet; (B) Publication of Summary Notice; (C) Establishment of Telephone Helpline and Settlement Website; and (D) Report on Requests for Exclusion Received to Date, dated June 23, 2023 (ECF No. 132-4) (“Initial Mailing Declaration”). I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

CONTINUED DISSEMINATION OF NOTICE

2. Since the execution of the Initial Mailing Declaration, A.B. Data has continued to disseminate copies of the Postcard Notice in response to requests from potential Settlement Class Members and Nominees. Through July 20, 2023, a total of 665,051 Postcard Notices (30,714 since the Initial Mailing Declaration) have been disseminated to potential Settlement Class Members and Nominees. In addition, a total of 39,628 emails (7,338 since the Initial Mailing Declaration) have been sent to potential Settlement Class Members to whom a Postcard Notice was also sent.

3. In addition, A.B. Data has re-mailed a total of 7,829 Postcard Notices to persons whose original mailing was returned by the U.S. Postal Service (“USPS”) and for whom updated addresses were provided to A.B. Data by USPS or were obtained by A.B. Data through the National Change of Address database. USPS has returned a total of 18,278 Postcard Notices as undeliverable for which A.B. Data has not been able to obtain an updated address. This number of undeliverable notices—which represents 2.7% of the total number of notices mailed, is consistent

¹ All terms with initial capitalization not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated March 2, 2023 (ECF No. 118-1) and the Initial Mailing Declaration defined herein.

with (or lower than) the rate of undeliverable notices typically seen in comparable class actions. *See, e.g.*, Post Distribution Accounting, *Rabkin v. Lion Biotechnologies, Inc.*, No. 3:17-cv-02086-SI (N.D. Cal. Sept. 2, 2021), ECF No. 153 (2.5% of notices were undeliverable); Post-Distribution Accounting Exhibit, *Larkin v. GoPro, Inc.*, No. 4:16-cv-06654-CW (N.D. Cal. July 29, 2020), ECF No. 145-1 (6% of notices were undeliverable); Miller Declaration Exhibit, *In re RH, Inc. Sec. Litig.*, No. 4:17-cv-00554-YGR (N.D. Cal. Oct. 15, 2019), ECF No. 147-4 (citing three cases in which the undeliverable notice rate ranged from 2% to 5%).

TELEPHONE HOTLINE AND SETTLEMENT WEBSITE

4. A.B. Data continues to maintain the toll-free telephone number (1-877-388-1759) with an interactive voice response system (“IVR”) and live operators during business hours to accommodate inquiries about the Settlement from potential members of the Settlement Class. Since the administration began on April 28, 2023, A.B. Data has received 3,429 in-bound calls, which included 53 hours and 17 minutes spent by callers interacting with the IVR and 32 hours and 36 minutes speaking with A.B. Data’s live operators. A.B. Data has made 464 out-bound calls to respond to messages left or to follow up on earlier communications. A.B. Data has also received 454 emails to the case email address, info@HPSecuritiesSettlement.com, and has sent 373 outgoing emails in connection with this case when a response was warranted.

5. A.B. Data also continues to maintain the dedicated Settlement Website for the Action (www.HPSecuritiesSettlement.com) to further assist potential members of the Settlement Class. On June 26, 2023, A.B. Data posted to the Settlement Website copies of the papers filed in support of Lead Plaintiffs’ motion for final approval of the Settlement and Plan of Allocation and in support of Lead Counsel’s motion for attorneys’ fees and Litigation Expenses. On July 7, 2023, A.B. Data updated the Settlement Website to inform potential Settlement Class Members that the Settlement Hearing on July 28, 2023 at 10:00 a.m. Pacific time would be conducted via Zoom videoconference and to contact Lead Counsel if they wish to attend or participate in the hearing. As of July 20, 2023, the Settlement Website has received 87,803 visitors.

6. A.B. Data will continue maintaining and, as appropriate, updating the toll-free telephone number/IVR and Settlement Website until the conclusion of the administration.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED

7. The notices and Settlement Website informed potential Settlement Class Members that requests for exclusion from the Settlement Class were to be addressed to *HP Securities Litigation*, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217, and received no later than July 7, 2023. A.B. Data has monitored all mail delivered to the P.O. Box for the Settlement. As of the date of this Declaration, A.B. Data has received 35 requests for exclusion from the Settlement Class, of which 31 were received on or before July 7, 2023, and four were received after that date.

8. Of the 35 requests for exclusion received, 17 requests for exclusion included transactional information as required by the Notice (“Valid Exclusions”) and 18 requests for exclusion did not include transactional information as required by the Notice (“Invalid Exclusions”). Exhibit 1 attached hereto lists the names (along with city and state) of the individuals who submitted Valid Exclusions, followed by copies of the Valid Exclusions. Exhibit 2 attached hereto lists the names (along with city and state) of the individuals who submitted Invalid Exclusions, followed by copies of the Invalid Exclusions.²

CLAIMS RECEIVED TO DATE

9. The notices and Settlement Website inform potential Settlement Class Members that, if they wish to participate in the Settlement, they must submit a Claim with supporting documentation to A.B. Data, postmarked (if mailed) or submitted online via the Settlement Website by August 14, 2023. As of July 20, 2023, A.B. Data has received 6,830 Claims. Of the Claims received, 2,378 Claims were filed electronically by institutional filers, 995 Claims were submitted by mail, and 3,457 Claims were submitted through the Settlement Website’s claims filing portal. In A.B. Data’s experience, the large majority of Claims are submitted shortly before

² For privacy reasons, the documents included in Exhibits 1 and 2 have been redacted to remove personal information such as street addresses, email addresses, telephone numbers, account numbers, Taxpayer ID, Social Security or Social Insurance Numbers, and all financial and transaction information not related to the individual’s transactions in HP common stock.

1 or on the claims-submission deadline. In particular, the majority of institutional investors and
2 Nominees typically file Claims electronically at or near the claims-submission deadline.

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

5 Executed this 21st day of July, 2023.

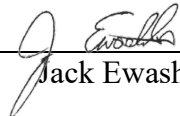
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Exhibit 1

1. Edward F. Dash
Highlands Ranch, CO
2. Barbara J. Dash
Highlands Ranch, CO
3. Daniel A. Padowski
East Amherst, NY
4. Didier Lavoignat
Tassin-la-Demi-Lune, France
5. Xavier Bruch
Sant Cugat del Valles, Spain
6. Patricia A. Garvey
Frederick, MD
7. Luca Razzi
Rome, Italy
8. Siobhan M. Caverly
Lake Oswego, OR
9. Estate of Paul Winicki
c/o Louis Bouldec
Burlington, Ontario, Canada
10. Märta Hage
Kista, Sweden
11. Susana Sabadías
Madrid, Spain
12. Agnes Prince-Crespel
Nozay, France
13. Dr. Johannes W. Hartmann and
Karin Hartmann
Ergolsbach, Germany
14. Jean-Marie Fierling
Oermingen, France
15. Donna Cognon
Wakefield, MA
16. Joshua Mayer
Colorado Springs, CO
17. Matthew K. Sommers
Ft. Myers, FL

1

HP - 54685

262745340



MAY 09 2023

[REDACTED]
May 4, 2023

HP Securities Litigation
EXCLUSIONS
% A.B. Data, Ltd.
P.O.Box 173001
Milwaukee, WI 53217

I, Edward F Dash, request exclusion from the Settlement Class in *HP Securities Litigation*, Case No. 3:20-cv-01260-SI.

Name: Edward F Dash

Address: [REDACTED]

Telephone: [REDACTED]

Number of shares of HP common stock owned as of the opening of trading on February 23, 2017 and purchased, acquired and/or sold during the class period between February 23, 2017 and October 3, 2019, inclusive, as well as the number of shares, dates and prices for each such purchase, acquisition and sale:

Security Name	Transaction Description	Quantity	Price (\$)	Transaction Date	Total Cost (\$)	Position Begin Date	Quantity	Position End Date	Quantity
HP Inc						2/23/2017	0		
HP Inc	Bought	200	\$ 18.13	4/12/2017	\$ 3,626.14				
HP Inc	Sold	200	\$ 21.00	11/20/2017	\$ 4,200.00				
HP Inc	Bought	400	\$ 20.63	12/28/2018	\$ 8,250.32				
HP Inc	Sold	200	\$ 20.00	2/28/2019	\$ 4,000.00				
HP Inc								10/3/2019	200

Security Name	Transaction Description	Quantity	Price (\$)	Transaction Date	Total Cost (\$)	Position Begin Date	Quantity	Position End Date	Quantity
HP Inc						2/23/2017	104		
HP Inc	Sold	52	\$ 20.00	2/28/2019	\$ 1,040.00				
HP Inc	Sold	52	\$ 19.78	6/11/2019	\$ 1,028.73				
HP Inc								10/3/2019	0

This is my written authorization to be excluded from the Settlement Class in *HP Securities Litigation*, Case No. 3:20-cv-01260-SI.

Edward F. Dash

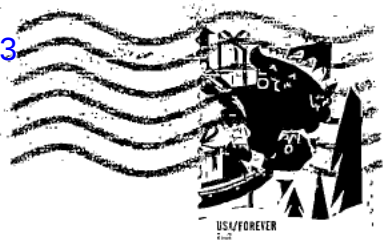
Edward F Dash

05/04/2023

May 4, 2023

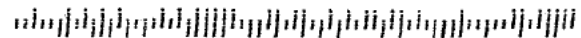
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4 MAY 2023 PM 3 L



HP Securities Litigation
EXCLUSIONS
% A.B. Data, Ltd.
P.O.Box 173001
Milwaukee, WI 53217

53217-801201



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MAY 09 2023

[REDACTED]

May 4, 2023

HP Securities Litigation
EXCLUSIONS
 % A.B. Data, Ltd.
 P.O.Box 173001
 Milwaukee, WI 53217

I, Barbara J Dash, request exclusion from the Settlement Class in *HP Securities Litigation*, Case No. 3:20-cv-01260-SI.

Name: Barbara J Dash
 Address: [REDACTED]

Telephone: [REDACTED]

Number of shares of HP common stock owned as of the opening of trading on February 23, 2017 and purchased, acquired and/or sold during the class period between February 23, 2017 and October 3, 2019, inclusive, as well as the number of shares, dates and prices for each such purchase, acquisition and sale:

Security Name	Transaction Description	Quantity	Price (\$)	Transaction Date	Total Cost (\$)	Position Begin Date	Quantity	Position End Date	Quantity
HP Inc						2/23/2017	0		
HP Inc	Bought	100	\$ 18.13	4/12/2017	\$ 1,813.07				
HP Inc	Sold	100	\$ 21.00	11/20/2017	\$ 2,100.00				
HP Inc								10/3/2019	0

Security Name	Transaction Description	Quantity	Price (\$)	Transaction Date	Total Cost (\$)	Position Begin Date	Quantity	Position End Date	Quantity
HP Inc						2/23/2017	104		
HP Inc	Sold	52	\$ 20.00	2/28/2019	\$ 1,040.00				
HP Inc	Sold	52	\$ 19.78	6/11/2019	\$ 1,028.73				
HP Inc								10/3/2019	0

This is my written authorization to be excluded from the Settlement Class in *HP Securities Litigation*, Case No. 3:20-cv-01260-SI.

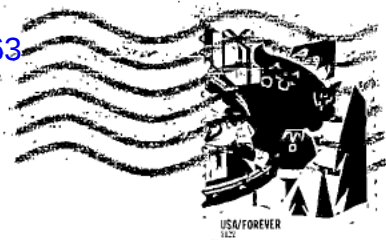
Barbara J Dash
 Barbara J Dash

May 4, 2023
 May 4, 2023



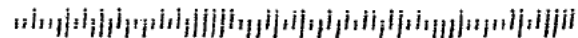
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4 MAY 2023 PM 3 L



HP Securities Litigation
EXCLUSIONS
% A.B. Data, Ltd.
P.O.Box 173001
Milwaukee, WI 53217

53217-801201



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MAY 16 2023

[REDACTED]
[REDACTED]
11 May 2023

HP Securities Litigation, EXCLUSIONS
c/o A.B. Data Ltd.
P.O. Box 173001
Milwaukee, WI 53217

Administrator;

I wish to be excluded from the Settlement Class in "In re HP Inc. Securities Litigation, Case No. 3:30-cv-01260-SI (N.D. Cal)".

- 1) Name: **Daniel A. Padowski** [REDACTED]
- 2) I request exclusion from the Settlement Class in "In re HP Inc. Securities Litigation, Case No. 3:30-cv-01260-SI (N.D. Cal)"
- 3) Shares owned as of 23-Feb-2017: **138.261**
- 4) Shares purchased during the Class Period (2/23/2017-10/3/2019): **11.181**
- 5) Share purchase summary:

DATE	DIVIDEND/SHARE	PRICE/SHARE	SHARES PURCHASED	TOTAL SHARES
			<i>Shares as of 2/23/2017) -></i>	138.261
03-06-17	0.1327	\$17.30	1.060533798	139.3215338
06-12-17	0.1327	\$17.76	1.040989163	140.362523
09-12-17	0.1327	\$19.48	0.956165647	141.3186886
12-12-17	0.1393	\$20.98	0.938307594	142.2569962
03-12-19	0.1393	\$23.62	0.838966959	143.0959632
06-12-18	0.1393	\$23.62	0.843914804	143.939878
09-11-18	0.1393	\$24.68	0.812432131	144.7523101
12-12-18	0.1602	\$22.55	1.028351223	145.7806613
03-12-19	0.1602	\$19.06	1.225291812	147.0059531
06-11-19	0.1602	\$19.86	1.185818413	148.1917715
09-10-19	0.1602	\$18.99	1.250148594	149.4419201

11.18092014

Thank you for your attention to this matter. I would appreciate a letter confirming that I have been excluded from this litigation settlement.

Sincerely,

Daniel A. Padowski

Daniel A. Padowski

Daniel Padowski

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 18 of 163

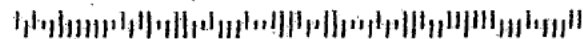
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HP Securities Litigation,
EXCLUSIONS
c/o A.B. Data Ltd.
P.O. Box 173001
Milwaukee, WI 53217

53217-801201



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MAY 23 2023

May 12th 2023

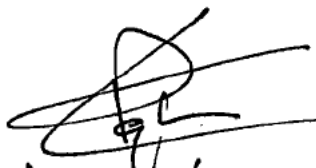
I, DIDIER LAVOIGNAT,
living at

Phone Number :

request exclusion from the Settlement Class in In re HP Inc.
Securities Litigation, Case No 3: 20-cv-01260-SI (N.D. Cal.) -

As of the opening of trading on February 23, 2017, I owned
849.315 shares and I acquired 39.284 shares during the
Class Period :

Date of acquisition	Number of Shares	Price per Share
April 4th 2017	3.610	\$ 17.885
July 5th 2017	3.677	\$ 17.670
Oct. 2nd 2017	3.217	\$ 20.326
Jan 5th 2018	3.222	\$ 21.466
April 4th 2018	3.261	\$ 21.323
July 5th 2018	3.082	\$ 22.692
Oct. 2nd 2018	2.692	\$ 26.112
Jan 4th 2019	3.956	\$ 20.644
April 3rd 2019	4.11	\$ 20.001
July 5th 2019	3.913	\$ 21.152
Oct. 2nd 2019	4.544	\$ 18.328


Didier LAVOIGNAT



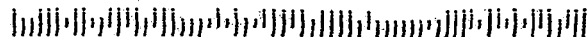
HP Securities Litigation, EXCLUSIONS
c/o A.B. Data, Ltd

P.O. Box 173 001

MILWAUKEE, WI 53217



ETATS-UNIS / USA



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262745350



JUN 07 2023

Xavier Bruch Pla

May 26th 2023






Dear Recipient:

I would like to request exclusion from the Settlement Class in In re HP Inc. Securities Litigation, Case No. 3:20-cv-01260-SI (N.D. Cal.).

As requested, here you have the list of shares owned as of opening of trading on February 23 2017: 1902,6

SHARES AT BEGINNING OF PERIOD
(23 Feb 2017)

Broker	Number of units
	1019
	873.6
	10

1902.6

Also, as requested, the shares purchased/acquired and/or sold during the Class Period (i.e., between February 23, 2017 and October 3, 2019, inclusive), as well as the dates, number of shares, and prices of each such purchase/acquisition and/or sale.

STREET ADDRESS, CITY, ST ZIP CODE
T (123) 456-7890 U WWW.COMPANY.COM

BUY - Restricted Units (Vested) - HPQ

Date	Broker	# shares	Unit Cost	Value
December 7, 2017		260	\$20.97	\$3,348.74
December 7, 2017		9	\$20.97	\$115.92
December 9, 2017		413	\$21.07	\$5,344.71
December 9, 2017		30	\$21.07	\$388.24
December 7, 2018		260	\$22.93	\$3,517.46
December 7, 2018		254	\$22.93	\$3,436.29
December 7, 2018		15	\$22.93	\$202.93
December 7, 2018		7	\$22.93	\$94.70
December 9, 2018		413	\$22.93	\$5,587.35
December 9, 2018		39	\$22.93	\$527.62
		1700		\$22,563.96

BUY - Reinvested dividends

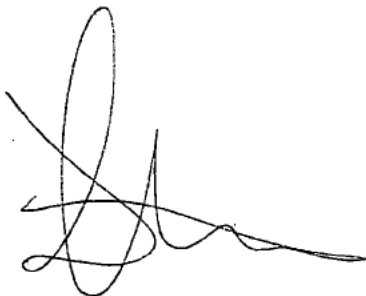
Date	Broker	# shares	Unit Cost	Value
December 7, 2017		159	\$20.97	\$4,723.89
December 7, 2017		5	\$20.97	\$148.55
December 9, 2017		253	\$21.07	\$7,516.63
December 9, 2017		18	\$21.07	\$534.78
December 7, 2018		153	\$22.93	\$4,545.63
December 7, 2018		8	\$22.93	\$237.68
December 7, 2018		149	\$22.93	\$4,426.79
December 7, 2018		4	\$22.93	\$118.84
December 9, 2018		243	\$22.93	\$7,219.53
December 9, 2018		23	\$22.93	\$683.33
		1015		\$30,155.65

SELL - Stock Options - HPQ

Date	Broker	Number of units	Exercise price	Grant price	Total value	Cost basis	Gain
January 26, 2018		1,513	\$23.65	\$10.92	\$35,782.45	\$16,521.96	\$19,260.49

Sincerely,

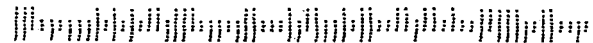
Xavier Bruch





HP SECURITIES LITIGATION
c/o A.B. Data, Ltd.
P.O. BOX 173010
MILWAUKEE, WI 53217

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Xavier Bruch



11/11/2023



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HP - 54685

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JUN 21 2023

June 15, 2023

HP Securities Litigation - EXCLUSIONS
Claims Administrator

Patricia A. Garvey "Requests exclusion
From the Settlement Class in
IN re HP Inc. Securities Litigation,
Case No. 3:20-cv-01260-SI (N.D.Cal)"

(A) OWNED 180 shares of HP common stock
VALUE around \$15.70 share.

PATRICIA A. GARVEY

[REDACTED]

[REDACTED]

Thank you,

Patricia A. Garvey

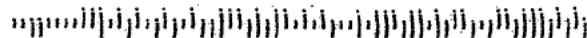


Patricia Garvey



HP. SECURITIES Litigation, Exclusions
C/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI
53217

53217\$8012 8050



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HP - 54685

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JUN 21 2023

Roma 05/31/2023

**HP Securities Litigation,
EXCLUSIONS c/o A.B. Data ,Ltd P.O. BOX 173001
Milwaukee,WI 53217
USA**

Good morning,

I received an e-mail about me being part of a class action for owning HPQ shares.

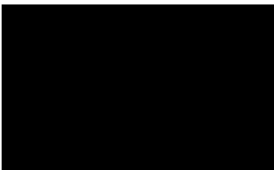
I request exclusion from the Settlement Class in re HP Inc.Securities Litigation , case 3:20-cv-01260-SI (ND Cal,)

During the period February 23,2017 – October 3,2019 I owned 974 shares of HPQ.

In this period I did not sell or buy any shares.

Thank you

Luca Razzi



A handwritten signature in black ink, appearing to read 'Luca Razzi' with a stylized flourish at the end.



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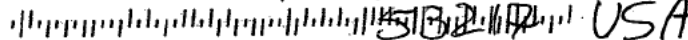


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HP Securities Litig.
EXCLUSIONS
c/o AB de la
PO BOX 173001
MILWAUKEE, WI
53217 USA

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JUN 27 2023

SIOBHAN CAVERLY

June 20, 2023

HP Securities Litigation
 EXCLUSIONS
 c/o A.B. Data, Ltd.
 P.O. Box 173001
 Milwaukee, WI 53217

To Whom It May Concern:

I request exclusion from the Settlement Class in the action *In Re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.).

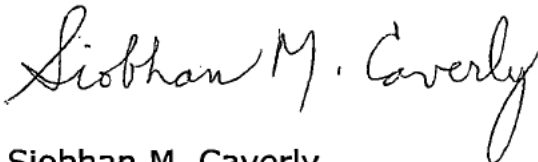
According to my records, I owned 251.605 shares of HP Inc. stock on February 23, 2017.

The shares I purchased through dividend reinvestment during the Class Period of February 23, 2017 to October 3, 2019 are as follows:

Apr. 10, 2017:	1.774 shares	\$17.8850 per share
Jul. 10, 2017:	1.808 shares	\$17.6702 per share
Oct. 6, 2017	1.583 shares	\$20.3256 per share
Jan. 5, 2018:	1.583 shares	\$21.4658 per share
Apr. 6, 2018:	1.603 shares	\$21.3230 per share
Jul. 9, 2018:	1.516 shares	\$22.6916 per share
Oct. 5, 2018	1.325 shares	\$26.1119 per share
Jan. 4, 2019	1.937 shares	\$20.6443 per share
Apr. 5, 2019	2.014 shares	\$20.006 per share
Jul. 8, 2019	1.919 shares	\$21.1522 per share
Oct. 4, 2019	2.231 shares	\$18.3280 per share

My contact information is above should there be any questions.

Sincerely,



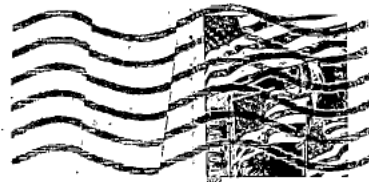
Siobhan M. Caverly

Siobhan M. Caverly

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 40 of 163

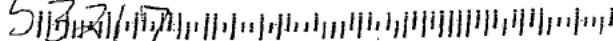
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HP Securities Litigation
EXCLUSIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

53217-891201



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JUN 27 2023

June 16th, 2023

HP Securities Litigation
EXCLUSIONS
c/o A.B. Data Ltd.
P.O. Box 173001
Milwaukee, WI 53217 USA

Subject: Settlement Class in *In re HP Inc. Securities Litigation*

Dear Sir or Madam,

I am writing you to request to be excluded from the Settlement Class in *In re HP Inc. Securities Litigation* – Case No. 3:20-cv-01260-SI (N.D. Cal.)

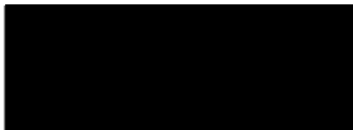
To the best of my knowledge and based on the documents I could find, 37 shares were purchased and sold at the amount of 21.21\$ CAD each on May 8th, 2018 and 125 shares were also purchased and sold at the amount of 21.4219\$ USD each also on May 8th, 2018. I cannot tell if the purchase was done during the Settlement Class period as this was done through a broker at the time and I no longer have access to these records since the estate of Mr. Winicki is terminated and all the accounts have been closed.

Thank you for your assistance on my request.

Sincerely,



Louise Bolduc
Estate of Paul Winicki

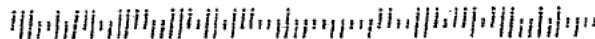


L.Bolduc



HP SECURITIES LITIGATION
EXCLUSIONS
c/o A.B. Data Ltd.
P.O. Box 173001
Milwaukee, WI 53217 USA

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262745359



JUN 27 2023

HP Securities Litigation, EXCLUSIONS,

c/o A.B. Data, Ltd., P.O. Box 173001,

Milwaukee, WI 53217.

Please exclude me from the Settlement Class in "In re HP Securities Litigation, case 3:20-cv-01260-SI(N.D.Cal)"

Total shares in February 27 2017: 109.894

Total shares in October 3, 2019: 116.202

The transactions in HP common Stocks are Dividend Reinvestments only.

Account Number: 

I have previously sent an exclusion letter in June 2023 that never arrived?

June 21, 2023

Märta Hage

Märta Hage



posti

21.6.2023 13:09

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KEMIÖ
KIMITO
Suomi Finland

Priority

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HP Securities Litigation, EXCLUSIONS

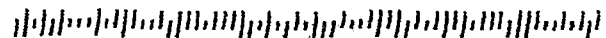
C.O. A.B. Data, Ltd.

P.O. Box 173001

Milwaukee, WI 53217

USA

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JUN 27 2023

HP Securities Litigation
EXCLUSIONS,
c/o A.B. Data, Ltd.,
P.O. Box 173001,
Milwaukee, WI 53217.

[REDACTED] 14th of June, 2023

Dear Sirs,

The purpose of this letter is to request that I want to be **excluded** from the Settlement Class in

In re HP Inc. Securities Litigation,
Case No. 3:20-cv-01260-SI (N.D. Cal.)

Name: SUSANA SABADIAS

Address: [REDACTED]
[REDACTED]

Tel.: [REDACTED]

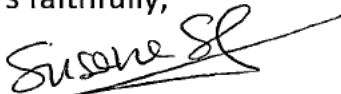
Shares owned during the period

(666,166 + 295,992) = 962,158 feb 23, 2017

(666,166 + 312, 975) = 979,141 oct 2, 2019

Reinvestment details in attached document

Yours faithfully,



SUSANA SABADIAS

Date: 14/06/2023



My Account ▾

[Portfolio](#)
[Dividends](#)
[Transactions ▾](#)
[Documents & Tax Forms ▾](#)
[Contact Us](#)

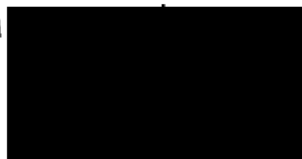
Filter



Payment Date ▴ ▾	Record Date	Dividend Rate	Record Date Share Balance	Gross Amount	Withholdings/Fees*	Investment Type	Dividend Type	Net Reinvest/Net Amount
Jan 4, 2017	Dec 14, 2016	0.13	293.915	\$39.00	\$5.85	Full Dividend Reinvestment (RD)	Reinvestment	\$33.15
Apr 5, 2017	Mar 8, 2017	0.13	295.982	\$39.27	\$5.89	Full Dividend Reinvestment (RD)	Reinvestment	\$33.38
Jul 5, 2017	Jun 14, 2017	0.13	297.765	\$39.51	\$5.92	Full Dividend Reinvestment (RD)	Reinvestment	\$33.59
Oct 4, 2017	Sep 13, 2017	0.13	299.571	\$39.75	\$5.96	Full Dividend Reinvestment (RD)	Reinvestment	\$33.79
Jan 3, 2018	Dec 13, 2017	0.14	301.150	\$41.95	\$8.29	Full Dividend Reinvestment (RD)	Reinvestment	\$33.66
Apr 4, 2018	Mar 14, 2018	0.14	302.728	\$42.17	\$8.33	Full Dividend Reinvestment (RD)	Reinvestment	\$33.84
Jul 5, 2018	Jun 13, 2018	0.14	304.324	\$42.39	\$8.36	Full Dividend Reinvestment (RD)	Reinvestment	\$34.03
Oct 3, 2018	Sep 12, 2018	0.14	305.832	\$42.60	\$8.39	Full Dividend Reinvestment (RD)	Reinvestment	\$34.21
Jan 2, 2019	Dec 13, 2018	0.16	307.149	\$49.20	\$7.38	Full Dividend Reinvestment (RD)	Reinvestment	\$41.82
Apr 3, 2019	Mar 13, 2019	0.16	309.074	\$49.51	\$7.43	Full Dividend Reinvestment (RD)	Reinvestment	\$42.08
Jul 3, 2019	Jun 12, 2019	0.16	311.073	\$49.83	\$7.46	Full Dividend Reinvestment (RD)	Reinvestment	\$42.35
Oct 2, 2019	Sep 11, 2019	0.16	312.975	\$50.13	\$7.52	Full Dividend Reinvestment (RD)	Reinvestment	\$42.61

Feedback

Susana Sabodrias



CERTIFICADO

AGENTE COMERCIAL DE CORREOS



C/ Torneros, 12 - P.I. Los Angeles
28906 Getafe - Madrid



CARTA CERTIFICADA
INTERNACIONAL

ES28053
MV007468

HP Securities Litigation

EXCLUSIONS

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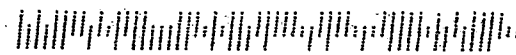
RR 39 914 817 5 ES



c/o A.B. Data, Ltd.,

P.O. Box 173001,

Milwaukee, WI 53217.



12

HP - 54685

266826545



JUN 28 2023

Agnes PRINCE-CRESPEL

June 16, 2023



HP Securities Litigation,
EXCLUSIONS,
c/o A.B. Data, Ltd.,
P.O. Box 173001,
Milwaukee, WI 53217.

Requests exclusion from the Settlement Class in *In re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.)

To whom it may concern,

Hereby, I request exclusion from the Settlement Class in re HP Inc. Securities Litigation, Case No. 3:20-cv-01260-SI (N.D. Cal.).

Number of shares of HP Common stock owned on February 23, 2017 : 593

Price per share of HP Common stock in February 2017 : \$17.60

Number of shares of HP Common stock sold on October 30, 2017 : 593

Price per share of HP Common stock on October 30, 2017 : \$21.39

Could you please confirm by email to [REDACTED] and mail that you have proceeded with my exclusion from the class?

Regards,

Agnès PRINCE-CRESPEL

A handwritten signature in black ink, appearing to read 'Agnès Prince-Crespel', written over the typed name.

INTERNATIONAL



No signature

LJ 05 300 885 9 FR



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HP Securities litigation

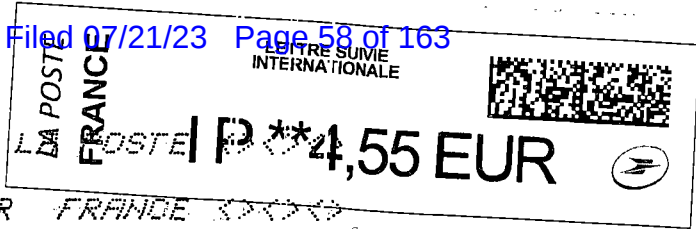
EXCLUSIONS

c/o A.B. Data, Ltd.

P.O. Box 173 001

MILWAUKEE, WI 53217

USA



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JUL 03 2023

Karin Hartmann
Dr. Johannes W. Hartmann

23.06.2023

HP Securities Litigation, EXCLUSIONS
c/o A.B. data, Ltd.,
P.O. Box 173001
Milwaukee, WI 53217

Request for exclusion from the Settlement Class in *In re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.)

Ladies and Gentlemen,

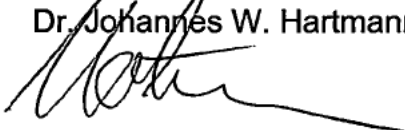
we request exclusion from the Settlement Class in *In re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.)

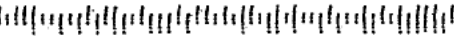
The amount of shares: 300,
aquired January 26, 2018 for the price of \$23.40

With kind regards

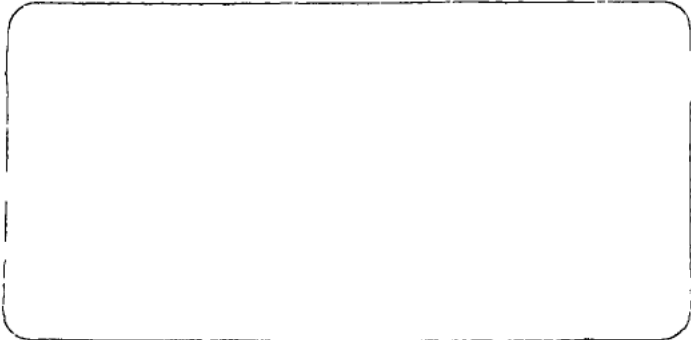
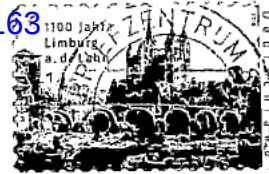


Karin Hartmann
Dr. Johannes W. Hartmann





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266826549



JUL 05 2023

June 20 th, 2023

From:
M. JMARIE FIERLING

to

HP Securities Litigation
EXCLUSIONS
c/o A.B. Data, Ltd
P.O. Box 173001
MILWAUKEE
WI 53217

RE: Request for Exclusion from Settlement Class In Re HP Inc. Securities Litigation,
Case N° 3:20-cv-01260-SI.

Dear Sir,

This signed letter is to inform you that I want to be excluded from the Settlement Class in the Action In Re HP Inc. Securities Litigation, Case N° 3:20-cv-01260-SI.

With this request for exclusion, I understand that I will not be legally bound by anything that happens in this lawsuit.

Number of owned shares : 1888 (no purchase nor acquisition during Class Period)

With best regards,
Jean-Marie Fierling



From: [REDACTED]
Sent: Monday, July 03, 2023 9:01 AM
To: info@HPsecuritiessettlement.com
Subject: Request for exclusion from Settlement Class In Re HP Inc.

EXTERNAL SENDER

Dear Sir,
please find, as attached document, my hand-signed request for exclusion from Settlement Class in re
HP Inc. Securities Litigation
Case N° 3:20-cv-01260-SI.

Please forward as appropriate (if necessary).

With best regards,

Jean-Marie FIERLING

[REDACTED]
[REDACTED]
[REDACTED]

Tel. : [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
E-mail : [REDACTED]

15

HP - 54685

266826552



JUL 07 2023

July 5, 2023

Ms. Donna Cognon


HP Securities Litigation
EXCLUSIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

To Whom it May Concern:

Requested information:

(i) Person requesting exclusion: Ms. Donna Cognon


(ii) I, Donna Cognon request exclusion from the Settlement Class
In re

HP Inc. Securities Litigation

Case No. 3:20-cv-01260-SI (N.D. Cal.)

(iii) Requested information on number of shares.

(A) Zero shares owned as of the opening of trading on 2/23/2017

(B) Purchased during the Class Period

74 shares purchased on 10/9/2018

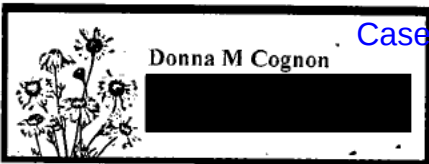
Price of shares: \$26.72990

Zero shares sold during the Class Period

Sincerely,



Ms. Donna Cognon



HP Securities Litigation
Exclusions
c/o A.B. Data Ltd.
P.O. Box 173001
Milwaukee, WI

53217

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PHONE ()

Donna Cognon
[Redacted]

Wakefield, MA 01880

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266826553



JUL 07 2023

June 30, 2023

HP Securities Litigation

EXCLUSIONS

c/o A.B. Data, Ltd.,

P.O. Box 173001

Milwaukee, WI 53217

RE: Request for Exclusion from Settlement Class *In re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.)

To Claims Administrator,

I, Joshua Mayer, request exclusion from the Settlement Class in the Action *In re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.). My information is listed below:

Joshua Mayer of [REDACTED]

Attached to this mail are the transactions and listed below is the number of HP common stocks I am requesting exclusion during the Class Period (between February 23, 2017 and October 3, 2019 inclusive).

09/13/2016: Owned Units during the Class Period: 0.96 for \$13.71 (\$14.28/unit)

09/13/2016: Owned Units during the Class Period: 0.04 for \$0.57 (\$14.25/unit)

01/04/2017: Owned Units during the Class Period: 0.009 for \$0.13 (\$14.44/unit)

07/05/2017: Purchased Units: 0.008 for \$0.13 (\$16.25/unit)

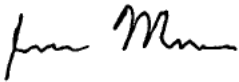
07/06/2018: Purchased Units: 0.006 for \$0.14 (\$23.33/unit)

04/04/2019: Purchased Units: 0.008 for \$0.16 (\$20/unit)

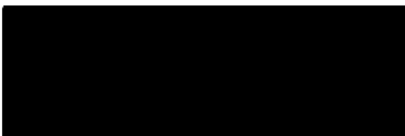
10/03/2019: Purchased Units: 0.009 for \$0.17 (\$18.89/unit)

Please contact me if you need more information.

Sincerely,



Joshua Mayer



Realized Sale Activity Details 1/1/2013 – 12/31/2023 Created: 6/28/2023 10:54:33 PM

Security	Units	Purchased	Orig Cost	WS Adj	Cost Basis	Proceeds	G/L Adj	ST Gain/Loss	LT Gain/Loss	% Change	Trading method	Status
HPQ HP INC	1.04		\$15.01		\$15.01	\$28.14			\$13.13	87.48%		
09/20/2021	0.96	09/13/2016	\$13.71		\$13.71	\$25.98			\$12.27	89.50%	lossharvest	D C
09/20/2021	0.009	01/04/2017	\$0.13		\$0.13	\$0.24			\$0.11	84.62%	lossharvest	D C
09/20/2021	0.008	07/05/2017	\$0.13		\$0.13	\$0.22			\$0.09	69.23%	lossharvest	D C
09/20/2021	0.006	07/06/2018	\$0.14		\$0.14	\$0.16			\$0.02	14.29%	lossharvest	D C
09/20/2021	0.008	04/04/2019	\$0.16		\$0.16	\$0.22			\$0.06	37.50%	lossharvest	D C
09/20/2021	0.009	10/03/2019	\$0.17		\$0.17	\$0.24			\$0.07	41.18%	lossharvest	D C DR
09/20/2021	0.04	09/13/2016	\$0.57		\$0.57	\$1.08			\$0.51	89.47%	lossharvest	D C
TOTAL (1 security, 7 lots)			\$15.01		\$15.01	\$28.14			\$13.13	87.48%		

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266826556



JUL 11 2023


I, Matthew K Sommers, "requests exclusion from the Settlement Class in *In re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.)"

I owned 400 shares of HPQ at the opening of trading 2/23/2017.

I bought 700 total shares of HPQ between 2/23/2017 and 10/03/2019.

On 5/24/2017 I bought 400 shares of HPQ at \$19.006 per share.

On 12/05/2017 I bought 300 shares of HPQ at \$21.3951 per share.



Matthew K Sommers

7/03/2023

Matthew Sommer

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 81 of 163

FT MYERS FL 339

6 JUL 2023 PM 1 L



987511213140451

FOREVER



HP Securities Litigation
Exclusions, c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

53217-801201

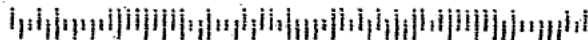


Exhibit 2

1. Donna Lanifero
Cranston, RI
2. Bas Vijgen
Moraira, Spain
3. Sandhu Avtar Singh
Reading, Berkshire
United Kingdom
4. Dennis D. Johnson
Ivins, UT
5. William Howard Malpass
Shreveport, LA
6. Trella C. Malpass
Shreveport, LA
7. Wissam Raffoul
Cherrybrook, NSW
Australia
8. Diane M. Giles
Delaware, Ontario
Canada
9. Albert Bitton
Colorado Springs, CO
10. Ann Sheckter Powell
11. Bradley Dettinger
Greenwood, IN
12. Diana Lokey
Catonsville, MD
13. Stephen Richards
Bakersfield, CA
14. Joe T. Mangum and
Heather D. Mangum
Aiken, SC
15. Vickie Chang
Kou-Hu, Taiwan
16. Samuel F. Scarpelli
Spokane, WA
17. Barbara A. Baylard
Santa Rosa, CA
18. Estate of Jonathan W. Steward
Santa Rosa, CA

1

262745343



MAY 19 2023

May 12, 2023

HP Securities Litigation


Claims Administrator

P.O. Box 173010

Milwaukee, Wisconsin 53211

To Whom It May Concern:

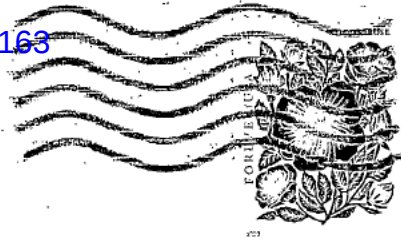
I would like to exclude myself from the Settlement Class which is due by July 7, 2023 in regards to HP Inc. Securities Litigation, CASE No. 20-cv-01260-SI (N.D. CAL)

Thank you. Please acknowledge via email 

Donna Lanifero

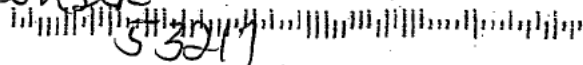

PROVIDENCE RI 028

15 MAY 2023 PM 2 L



HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, Wisconsin

53217-802310



2

HP - 54685

262745345



JUN 01 2023

From:

Bas Vijgen

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Moraira 23-05-2023

To:

Claims Administrator

HP Securities Litigation

c/o A.B. Data, Ltd.

P.O. Box 173010

Milwaukee, WI 53217

USA

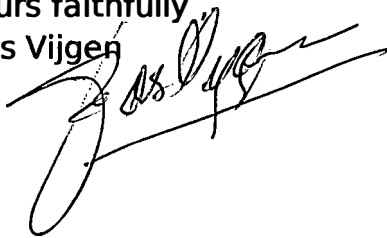
Subject: Exclusion

Dear Sir ,

I don't want to receive a payment from this Settlement .
Therefor I exclude myself from the Settlement .

Yours faithfully

Bas Vijgen

A handwritten signature in black ink, appearing to read 'Bas Vijgen', with a long horizontal flourish extending to the right.



R



CARTA CERTIFICADA
INTERNACIONAL
MORAIRA

6,90 €

24/05/23

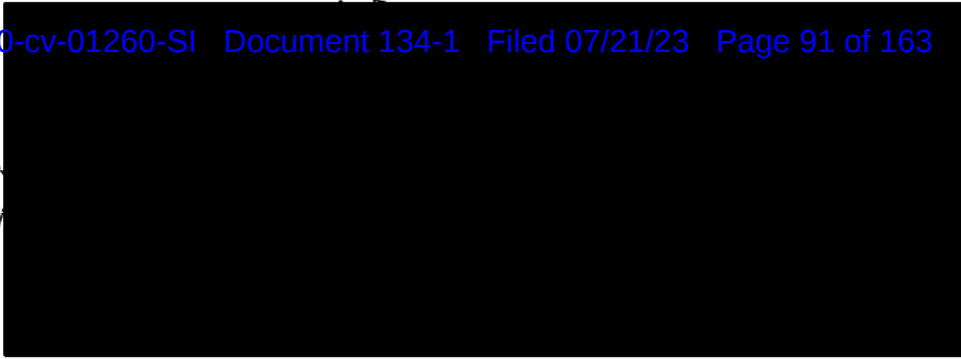
10:16

RF279983989ES



HP Securities Litigation.
c/o A.B. Data Ltd.
P.O. Box 173000
MILWAUKEE, WI 53217
USA

✓



3

HP - 54685

262745346



JUN 01 2023

Date: 10th May 2023

SANDHU AVTAR SINGH



HP securities Litigation
Claim Administrator
P.O.Box 173010
Milwaukee, WI 53217

Dear Sir /Madam

Case NO. 20-cv-01260-SI (N.D. Cal)

All of my HP Common stock had been cashed by me and therefore is nothing what H. P. Securities owe^s to me any more.
Therefore I would request you to exclude me from the Settlement Class altogether.

Regards

Sandhu Avtar Singh

A handwritten signature in black ink, appearing to read "Sandhu".



A. Sandhu



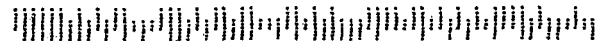
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Claim Administrator
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MILWAUKEE
WI 53217
U.S.A.

4

HP - 54685

262745347



JUN 02 2023

5/25/2023

To Whom It May Concern,

I do not want to be included in the Class Action in accordance with the procedures set forth in the notice regarding the following action: In re HP Inc. Securities Litigation, Case No. 20-cv-01260-SI

Dennis D. Johnson



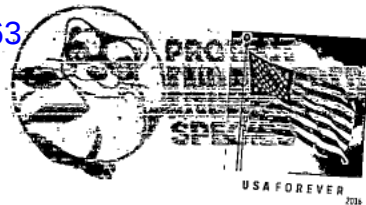
Colleen A Johnson
P.O. A. for Dennis D. Johnson

Mr. & Mrs. Dennis Johnson

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 100 of 163

SALT LAKE CITY UT 840

26 MAY 2023 PM 2 L



HP Securities Litigation
c/o A.B. Data, Ltd
Box 173010
Milwaukee, WI 53217

53217-802310



5

HP - 54685

262745348



JUN 07 2023



H P Securities Litigation

Claims Administrator

P.O. Box 73010

Milwaukee, WI 53217

RE: In re H P Inc. Securities Litigation Case No. 20-cv-01260-SI (N.D. Cal.)

I have received the court -ordered legal notice and I wish to exclude myself from the Settlement Class, as I do not want to be legally bound by any releases, judgements, or orders in the Action.

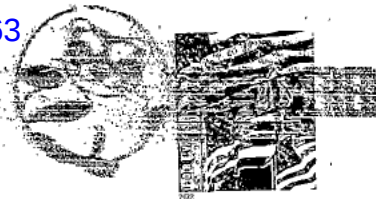



William Howard Melrose

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 104 of 163

SHREVEPORT LA 710

MAY 2023 PM 3:1

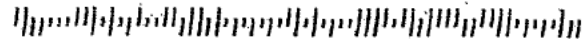


H P Securities Litigation
Claims Administrator

P.O. Box 73010

Milwaukee, WI 53217

53217-999955



6

262745349



JUN 07 2023



H P Securities Litigation

Claims Administrator

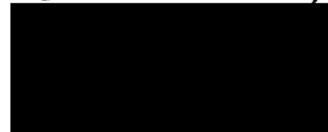
P.O. Box 73010

Milwaukee, WI 53217

RE: In re H P Inc. Securities Litigation Case No. 20-cv-01260-SI (N.D. Cal.)

I have received the court -ordered legal notice and I wish to exclude myself from the Settlement Class, as I do not want to be legally bound by any releases, judgements, or orders in the Action.

Jella E. Malpass

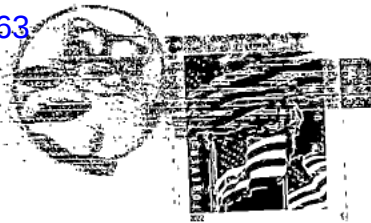


Franklin C. Murphy

Case 0:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 108 of 163

SHREVEPORT, LA 710

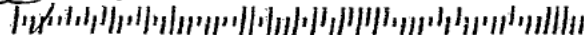
31 MAY 2023 PM 3 1



H P Securities Litigation
Claims Administrator
P.O. Box 73010

Milwaukee, WI 53217

53217-999955



7

HP - 54685

262745351



JUN 08 2023

Date: 22 May 2023

Claims Administrator
HP Securities Litigation
c/o A.B. Data, Ltd.
P.O. Box 173010
Milwaukee, WI 53217
USA

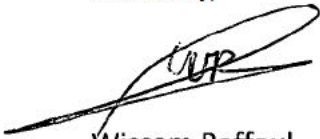
Subject : Request for Exclusion from the Settlement Class

Dear Sir/Madam,

My name is Wissam Raffoul. I would like to exclude myself from the Settlement Class associated with HP Securities Litigation.

Please take the necessary action in this regard.

Sincerely,



Wissam Raffoul

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

SENDER

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 112 of 163

WISSAM RAFFOUL



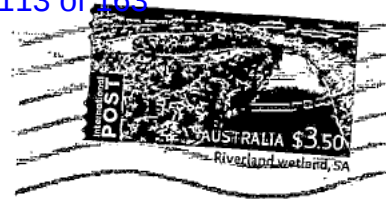
Sender:

Case 2:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 113 of 163



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23. 05. 23 07h42



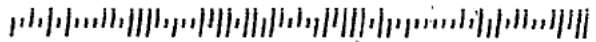
CLAIMS ADMINISTRATOR
HP SECURITIES LITIGATION
c/o A.B. Data, Ltd.
P.O. Box 173010
MILWAUKEE
WI 53217
USA

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8

HP - 54685


262745352



JUN 13 2023

May 23, 2023

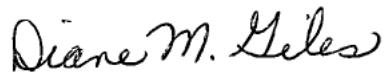
HP Securities Litigation
c/o A.B. Data, Ltd.
PO Box 173010
Milwaukee, WI 53217

RE: Notice ID: 

To Whom It May Concern,

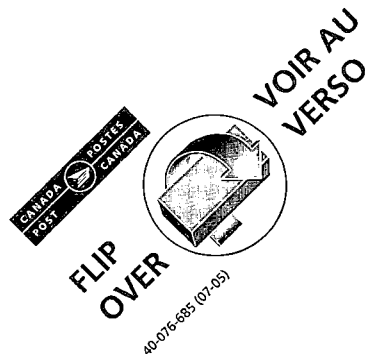
I ask to be excluded from the current litigation and request that you accept this letter.

Regards,



Diane M. Giles





HP Securities Litigation
c/o A.B. Data, Ltd.
PO Box 173010
Milwaukee, WI 53217
USA



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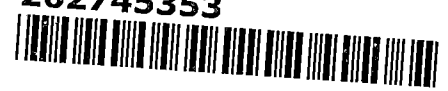
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262745353

HP - 54685



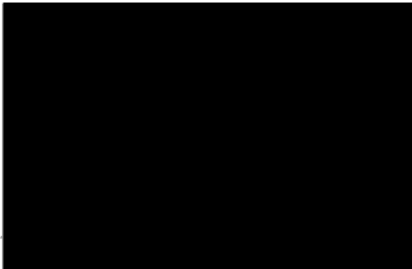
JUN 14 2023

To: HP Inc. Securities Litigation

I Request Exclusion from the Settlement Class

Case no. 20-cv-01260-si [n.d. cal.]

Albert bitton



A handwritten signature in black ink, appearing to read "Albert Bitton".

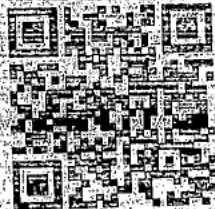
thank you

COURT-ORDERED LEGAL NOTICE

In re HP Inc. Securities Litigation
Case No: 20-cv-01260-SI (N.D. Cal.)

Your legal rights may be affected by this securities
class action. You may be eligible for a cash
payment from the Settlement. Please read this
Postcard Notice carefully.

For more information, please visit
www.HPSecuritiesSettlement.com
or call 1-877-388-1750.



HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, WI 53217

PRESORTED FIRST CLASS
U.S. POSTAGE PAID
FARMINGDALE, NY
PERMIT NO. 225

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03

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*****AUTO**ALL FOR AADC 808
ALBERT BITTON

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ALBERT BITTON

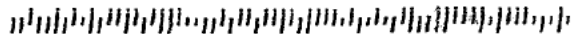
DENVER CO 802

9 JUN 2023 PM 7 L



TO: HP SECURITIES LITIGATION
C/O A.B. DATA, LTD.
P.O. BOX 173010
MILWAUKEE, WI 53217

53217-802310



10

HP - 54685

262745354

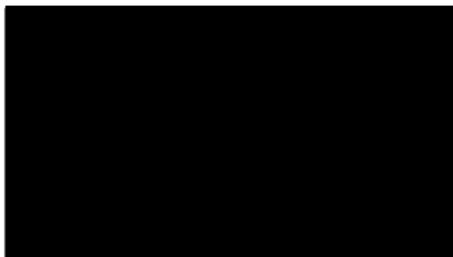


JUN 20 2023

Jennifer L. Enck

From: info
Sent: Tuesday, May 30, 2023 8:56 AM
To: Jennifer L. Enck; Robin Winchester
Subject: FW: HPSecuritiesSettlement

Alyssa Cahill
Data Intake Manager



PRIVILEGED ATTORNEY/CLIENT, ATTORNEY WORK PRODUCT The information in this transmittal may include privileged and confidential material and is intended for the recipient(s) listed above. If you are neither the intended recipient(s) nor a person responsible for the delivery of this transmittal to the intended recipient(s), you are hereby notified that any distribution or copying of this transmittal is prohibited. If you have received this transmittal in error, please notify the sender immediately at Kessler Topaz Meltzer & Check, LLP at (610) 667-7706 or via return e-mail.

-----Original Message-----

From: Ann Powell [REDACTED]
Sent: Thursday, May 25, 2023 4:36 PM
To: info <info@ktmc.com>
Subject: HPSecuritiesSettlement

External E-Mail

I have no idea what this is, and certainly have not engaged you to sue anyone on my behalf. Remove my name from your so-called class, and so advise the court and the defendant. DO NOT CLAIM ANY FEES FOR SERVICES THAT I HAVE NOT AUTHORIZED.

I consider your suing in my name without my consent to be unethical, even under the dubious cover of what your occupation has euphemized as "class actions." They are an underhanded way of enriching the few (the attorneys engaged in particular) in the unauthorized naming of the many.

What you are doing is a sophisticated form of theft. Done, unfortunately, under the cover of law.

Ann Sheckter Powell

11

HP - 54685

266826546



JUN 30 2023

Bradley Dettinger



June 18th, 2023

HP Securities Litigation

Claims Administrator

P.O. Box 173010

Milwaukee, WI 53217

Dear Claims Administrator,

Writing this letter to be excluded from the Settlement class in the action In re
HP Inc. Securities Litigation Case No. 20-cv-01260-SI (N.D. Cal.)

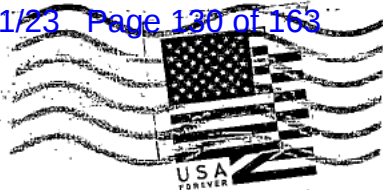
Sincerely,

Bradley Dettinger

B. Detsky

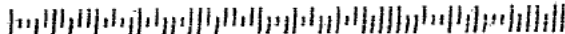
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HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, WI 53217

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12

HP - 54685

266826548



JUL 03 2023



Diana Lokey

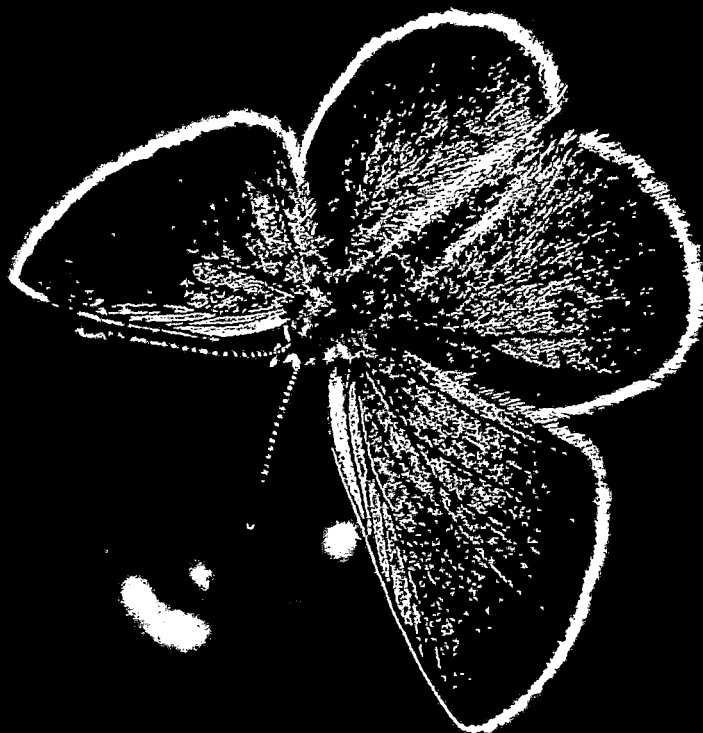


To Whom it may concern,

I don't even know if I have HP Securities.
Therefore, I want to exclude myself.

Take my name off of the list. I do not
want to be involved with any settlement. So,
don't send me any forms to fill out. I'm
too busy as it is.

Thank you,
Diana

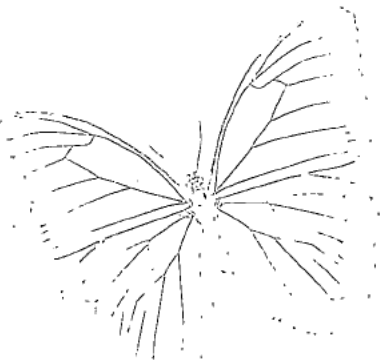
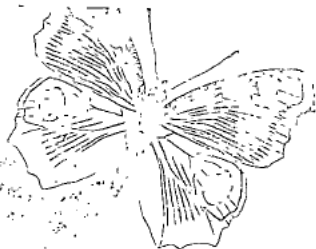


Environmental Defense Fund's mission is to preserve the natural systems on which all life depends. Guided by science and economics, we find practical and lasting solutions to the most serious environmental problems.

Common blue (Polyommatus icarus)

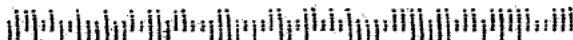


Diana Lokey



*HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, WI 53217*

5321738023 B050



13

HP - 54685

266826550



JUL 05 2023

From: Stephen Richards [REDACTED]
Sent: Wednesday, July 5, 2023 1:25 PM
To: Jennifer L. Enck [REDACTED]
Cc: [REDACTED]; info [REDACTED]
Subject: Re: Request Exclusion

External E-Mail

As per your below instructions, my name is Stephen Richards and my home/mailing address is [REDACTED]
[REDACTED]

On Wed, Jul 5, 2023 at 9:46 AM Jennifer L. Enck [REDACTED] wrote:

Hello –

We are in receipt of your below email.

The requirements for requesting exclusion from the Settlement Class are set forth in paragraph 48 of the attached notice. A request for exclusion must: (i) 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; (ii) state that such person or entity "requests exclusion from the Settlement Class in *In re HP Inc. Securities Litigation*, Case No. 3:20-cv-01260-SI (N.D. Cal.)"; (iii) state the number of shares of HP common stock that the person or entity requesting exclusion (A) owned as of the opening of trading on February 23, 2017 and (B) purchased/acquired and/or sold during the Class Period (i.e., between February 23, 2017 and October 3, 2019, inclusive), as well as the dates, number of shares, and prices of each such purchase/acquisition and/or sale; and (iv) be signed by the person or entity requesting exclusion or an authorized representative.

We will still present your request for exclusion to the Court without all of the above information, but it is ultimately up to the Court to decide whether it is a valid exclusion.

At the very least, could you please confirm your name (Stephen Richards) and provide us with your mailing address.

Please let me know if you have any questions.

Thank you.

Jennifer

Jennifer Enck, Counsel



280 King of Prussia Road

Radnor, Pennsylvania 19087

Direct Dial: 610-822-0263

General Firm Phone: 610-667-7706

General Firm Fax: 610-667-7056

e-mail: jenck@ktmc.com

Internet: www.ktmc.com

From: Stephen Richards [REDACTED]
Sent: Wednesday, July 5, 2023 11:05 AM
To: info [REDACTED]
Cc: Stephen Richards [REDACTED]
Subject: Request Exclusion

External E-Mail

As per your instructions at <http://hpsecuritiessettlement.com/>, please exclude me from your Case #20-cv-01260-SI (N.D. Cal.) Settlement Class.

Sent from my iPhone

14

HP - 54685

266826551



JUL 06 2023

HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, WI 53217

June 27, 2023

TO WHOM IT MAY CONCERN:

We, Heather D. Mangum and Joe T. Mangum hereby, are notifying you we do not wish to participate in the HP Inc, Securities Litigation, Case No. 20-cv-01260-SI (N.D. Cal)

We understand and request to exclude ourselves according to the litigation's definition: EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION SO THAT IT IS RECEIVED NO LATER THAN JULY 7, 2023.

Sincerely,

Heather D. Mangum



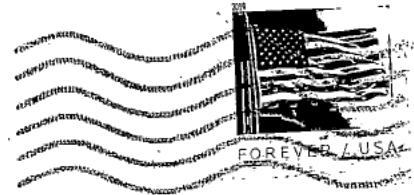
Joe T. Mangum




HEATHER & JOE MANGUM
[REDACTED]

AUGUSTA GA 309

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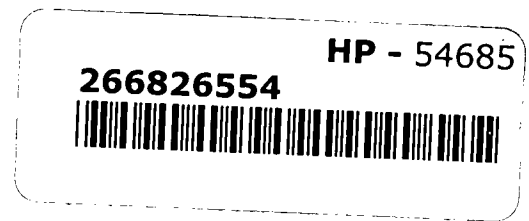


HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, WI 53217

532173023



15



JUL 07 2023

From: Vickie [REDACTED]
Sent: Thursday, July 06, 2023 9:02 PM
To: info@HPsecuritiessettlement.com
Subject: EXCLUDE myself FROM THE SETTLEMENT CLASS

EXTERNAL SENDER

Hi,
I want to exclude myself from the settlement class.

My Notice ID: [REDACTED]
(as attached file)

Thank you.

Best Regards,
Vickie Chang

16

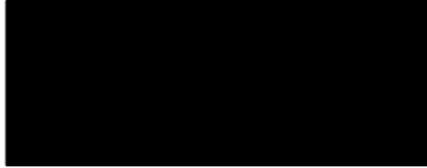
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JUL 11 2023

July 4, 2023

Samuel F. Scarpelli



H.P. Securities Litigation, EXCLUSIONS
c/o A.B. Data, Ltd.
P.O. Box 173001
Milwaukee, WI 53217

Dear Claims Administrator,

I want to be excluded from the Settlement Class in In re HP Inc. Securities Litigation, Case No. 3:20-cv-01260-SI (N.D. Cal.) .

I have attached all requested documentation.

Regards,

Samuel F. Scarpelli
Samuel F. Scarpelli

Samuel F. Scarpelli

Perish



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H.P. Securities Litigation, EXCLUSIONS

c/o A.B. Data, Ltd.

P.O. Box 173001

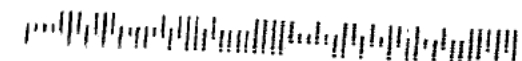
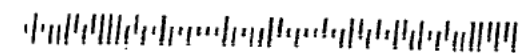
Milwaukee, WI 53217

EXPECTED DELIVERY DAY: 07/07/23

USPS TRACKING® #



9505 5125 0707 3186 7057 23



17

HP - 54685

266826558



JUL 18 2023

Barbara A. Baylard

Santa Rosa, CA 95407-4503

Santa Rosa, CA 95402-6085

HP Securities Litigation

Claims Administrator

PO Box 173010

Milwaukee, WI 53217

July 11, 2023

Enc: Court-Ordered Legal Notices for:

BAYLARD, Barbara Allyn

STEWART, Jonathan W.

My husband has been dec'd since

4.3.2018. Please exclude both of

our names from the Settlement.

This is a request to Opt-Out.

Barbara A. Baylard

Barbara A. Baylard

COURT-ORDERED LEGAL NOTICE

In re HP Inc. Securities Litigation
Case No. 20-cv-01260-SI (N.D. Cal.)

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For more information, please visit
www.HPSecuritiesSettlement.com
or call 1-877-388-1759.



03

HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, WI 53217

PRESORTED FIRST CLASS
U.S. POSTAGE PAID
FARMINGDALE, NY
PERMIT NO.225



03

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JOB# N86892-010 4#

*****AUTO**ALL FOR AADC 940

BARBARA ALLYN BAYLARD

SANTA ROSA CA 95402-6085



THIS POSTCARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT.
Please visit www.HPSecuritiesSettlement.com for more information.

The parties in the action *In re HP Inc. Securities Litigation*, Case No. 20-cv-01260-SI (N.D. Cal.) ("Action") have reached a proposed settlement of claims in a pending securities class action against HP Inc. ("HP") and certain of its current and former executives (collectively, "Defendants"). If approved, the Settlement will resolve a lawsuit in which Lead Plaintiffs alleged that Defendants made materially false and misleading statements concerning HP's supplies business during the relevant time period. Defendants deny any liability or wrongdoing. You received this notice because you, or an account for which you serve as a custodian, may be a member of the following Settlement Class: All persons and entities who purchased or otherwise acquired HP common stock between February 23, 2017 and October 3, 2019, inclusive, and were damaged thereby.

Pursuant to the Settlement, Defendants have agreed to pay \$10,500,000, which, after deducting any Court-awarded fees and expenses, notice and administration costs, and taxes, will be allocated among Settlement Class Members who submit valid claims, in exchange for the Settlement of the Action and the release of all claims asserted in the Action and related claims. **For additional information regarding the Settlement, please review the full Notice available at www.HPSecuritiesSettlement.com.** If you are a Settlement Class Member, your *pro rata* share of the Settlement will depend on the number of valid claims submitted, and the number, size, and timing of your transactions in HP common stock during the relevant time period. If all Settlement Class Members elect to participate in the Settlement, the estimated average recovery per eligible share of HP common stock will be approximately \$0.013 *before* deducting any Court-approved fees, expenses, and costs. Your actual share of the Settlement will be determined pursuant to the Plan of Allocation set forth in the full Notice, or other plan of allocation ordered by the Court.

To qualify for a payment, you must submit a valid Claim Form. The Claim Form can be found and submitted on the Settlement Website, or you can request that one be mailed to you. **Claim Forms must be postmarked (if mailed), or submitted online, by August 14, 2023.** If you do not want to be legally bound by any releases, judgments, or orders in the Action, **you must exclude yourself from the Settlement Class by July 7, 2023.** If you exclude yourself from the Settlement Class, you may be able to sue Defendants about the claims being resolved in the Action, but you cannot get money from the Settlement. If you want to object to any aspect of the Settlement, you must file or mail an objection by **July 7, 2023.** The full Notice provides instructions on how to submit a Claim Form, exclude yourself, or object, and you must comply with all of the instructions in the Notice.

The Court will hold a hearing on **July 28, 2023, at 10:00 a.m. Pacific Time**, to consider, among other things, whether to approve the Settlement and a request by the lawyers representing the Settlement Class for up to 18% of the Settlement Fund in attorneys' fees, plus expenses of no more than \$250,000 (which equals a cost of approximately \$0.003 per eligible share of HP common stock). You may attend the hearing and ask to be heard by the Court, but you do not have to. **For more information, call 1-877-388-1759, send an email to info@HPSecuritiesSettlement.com, or visit www.HPSecuritiesSettlement.com.**

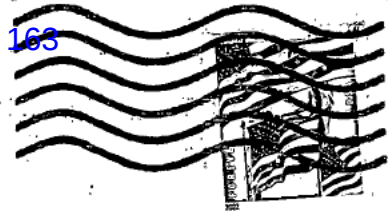
B. Baylard

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 157 of 163

SAN FRANCISCO CA 940

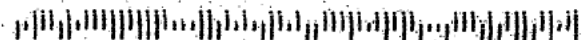
Santa Rosa, CA 95402

12 JUL 2023 PM 5 L



HP Securities Litigation
Claims Administrator
PO Box 173010
Milwaukee, WI 53217

53217-802310



18

HP - 54685

266826559



JUL 18 2023

Barbara A. Baylard

[REDACTED]
Santa Rosa, CA 95407-4503

[REDACTED]
Santa Rosa, CA 95402-6085

HP Securities Litigation
Claims Administrator
PO Box 173010
Milwaukee, WI 53217

July 11, 2023

Enc: Court-Ordered Legal Notices for:
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STEWART, Jonathan W.

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4.3.2018. Please exclude both of
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Barbara L. Baylard
Barbara A. Baylard

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or call 1-877-388-1759.



05

HP Securities Litigation
Claims Administrator
P.O. Box 173010
Milwaukee, WI 53217

POSTED FIRST CLASS
U.S. POSTAGE PAID
FARMINGDALE, NY
PERMIT NO.225



05

00285605



JOB# N86892-010 4#

*****AUTO**ALL FOR AADC 940

JONATHAN W. STEWARD



THIS POSTCARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT.
Please visit www.HPSecuritiesSettlement.com for more information.

The parties in the action *In re HP Inc. Securities Litigation*, Case No. 20-cv-01260-SI (N.D. Cal.) ("Action") have reached a proposed settlement of claims in a pending securities class action against HP Inc. ("HP") and certain of its current and former executives (collectively, "Defendants"). If approved, the Settlement will resolve a lawsuit in which Lead Plaintiffs alleged that Defendants made materially false and misleading statements concerning HP's supplies business during the relevant time period. Defendants deny any liability or wrongdoing. You received this notice because you, or an account for which you serve as a custodian, may be a member of the following Settlement Class: All persons and entities who purchased or otherwise acquired HP common stock between February 23, 2017 and October 3, 2019, inclusive, and were damaged thereby.

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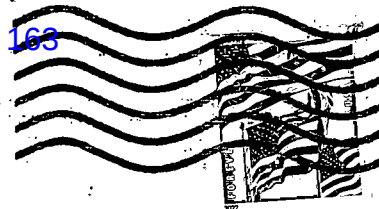
B. Baylard

Case 3:20-cv-01260-SI Document 134-1 Filed 07/21/23 Page 163 of 163

SAN FRANCISCO CA 940

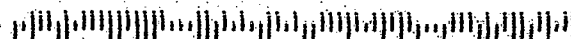
Santa Rosa, CA 95402

12 JUL 2023 PM 5 L



HP Securities Litigation
Claims Administrator
PO Box 173010
Milwaukee, WI 53217

53217-802310



**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE HP INC. SECURITIES LITIGATION

Case No. 3:20-cv-01260-SI

**[PROPOSED] JUDGMENT APPROVING
CLASS ACTION SETTLEMENT**

CLASS ACTION

WHEREAS, the above-captioned action is pending in this Court (“Action”);

WHEREAS, (a) the State of Rhode Island, Office of the General Treasurer, on behalf of the Employees’ Retirement System of Rhode Island, and Iron Workers Local 580 Joint Funds (together, “Lead Plaintiffs”), on behalf of themselves and the Settlement Class (as defined below); and (b) HP Inc. (“HP” or the “Company”), Dion J. Weisler, Catherine A. Lesjak, Steven J. Fieler, and Enrique Lores (collectively, “Defendants”) have entered into the Stipulation and Agreement of Settlement dated March 2, 2023 (“Stipulation”), that provides for a complete dismissal with prejudice of the claims asserted against Defendants in the Action on the terms and conditions set forth in the Stipulation, subject to the approval of this Court (“Settlement”);

WHEREAS, unless otherwise defined in this Judgment, the capitalized terms herein shall have the same meanings as they have in the Stipulation;

WHEREAS, by Order dated April 7, 2023 (“Preliminary Approval Order”), this Court: (a) found, pursuant to Rule 23(e)(1)(B) of the Federal Rules of Civil Procedure, that it (i) would likely be able to

certify the Settlement Class for purposes of the Settlement and (ii) would likely be able to approve the Settlement as fair, reasonable, and adequate under Rule 23(e)(2); (b) ordered that notice of the proposed Settlement be provided to potential Settlement Class Members; (c) provided Settlement Class Members with the opportunity to exclude themselves from the Settlement Class or to object to the proposed Settlement; and (d) scheduled a hearing regarding final approval of the Settlement;

WHEREAS, due and adequate notice has been given to the Settlement Class;

WHEREAS, the Court conducted a hearing on July 28, 2023 (“Settlement Hearing”) to consider, among other things, (a) whether the terms and conditions of the Settlement are fair, reasonable, and adequate to the Settlement Class, and should therefore be approved; and (b) whether a judgment should be entered dismissing the Action with prejudice as against the Defendants; and

WHEREAS, the Court having reviewed and considered the Stipulation, all papers filed and proceedings held herein in connection with the Settlement, all oral and written comments received regarding the Settlement, and the record in the Action, and good cause appearing therefor;

NOW THEREFORE, IT IS HEREBY ORDERED:

1. **Jurisdiction** – The Court has jurisdiction over the subject matter of the Action, and all matters relating to the Settlement, as well as personal jurisdiction over all of the Parties and each of the Settlement Class Members.

2. **Incorporation of Settlement Documents** – This Judgment incorporates and makes a part hereof: (a) the Stipulation filed with the Court on March 3, 2023; and (b) the Postcard Notice, Notice, and Summary Notice, all of which were filed with the Court on June 23, 2023.

3. **Class Certification for Settlement Purposes** – The Court hereby certifies for the purposes of the Settlement only, the Action as a class action pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure on behalf of the Settlement Class consisting of all persons and entities who purchased or otherwise acquired the common stock of HP between February 23, 2017 and October 3, 2019, inclusive (“Class Period”), and were damaged thereby. Excluded from the Settlement Class are Defendants, the Officers and directors of HP at all relevant times, members of their Immediate Families and their legal representatives, heirs, agents, affiliates, successors or assigns, Defendants’ liability insurance carriers and any affiliates or subsidiaries thereof, and any entity in which Defendants or their Immediate Families have

1 or had a controlling interest. Also excluded from the Settlement Class are the persons listed on Exhibit 1
2 hereto who submitted a timely and valid request for exclusion from the Settlement Class in accordance
3 with the requirements for requesting exclusion provided in the Notice or that has otherwise been accepted
4 by the Court.

5 4. **Adequacy of Representation** – Pursuant to Rule 23 of the Federal Rules of Civil
6 Procedure, and for the purposes of the Settlement only, the Court hereby appoints Lead Plaintiffs as Class
7 Representatives for the Settlement Class and appoints Lead Counsel Kessler Topaz Meltzer & Check, LLP
8 and Bernstein Litowitz Berger & Grossmann LLP as Class Counsel for the Settlement Class. Lead
9 Plaintiffs and Lead Counsel have fairly and adequately represented the Settlement Class both in terms of
10 litigating the Action and for purposes of entering into and implementing the Settlement, and have satisfied
11 the requirements of Federal Rules of Civil Procedure 23(a)(4) and 23(g), respectively.

12 5. **Notice** – The Court finds that the dissemination of the Postcard Notice and Notice and the
13 publication of the Summary Notice: (a) were implemented in accordance with the Preliminary Approval
14 Order; (b) constituted the best notice practicable under the circumstances; (c) constituted notice that was
15 reasonably calculated, under the circumstances, to apprise Settlement Class Members of (i) the pendency
16 of the Action; (ii) the effect of the proposed Settlement (including the Releases to be provided thereunder);
17 (iii) Lead Counsel’s motion for attorneys’ fees and Litigation Expenses; (iv) their right to object to any
18 aspect of the Settlement, the Plan of Allocation and/or Lead Counsel’s motion for attorneys’ fees and
19 Litigation Expenses; (v) their right to exclude themselves from the Settlement Class; and (vi) their right to
20 appear at the Settlement Hearing; (d) constituted due, adequate, and sufficient notice to all persons and
21 entities entitled to receive notice of the proposed Settlement; and (e) satisfied the requirements of Rule 23
22 of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause),
23 the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, as amended, and all other
24 applicable law and rules. No Settlement Class Member is relieved from the terms of the Settlement,
25 including the Releases provided for therein, based upon the contention or proof that such Settlement Class
26 Member failed to receive actual or adequate notice. A full opportunity has been offered to Settlement Class
27 Members to object to the proposed Settlement and to participate in the hearing thereon. Thus, it is hereby
28

determined that all Settlement Class Members are bound by this Judgment, except those persons listed on Exhibit 1 to this Judgment.

6. **CAFA Notice** - The Court finds that the notice requirements set forth in the Class Action Fairness Act of 2005, 28 U.S.C. § 1715, to the extent applicable to the Action, have been satisfied.

7. **Final Settlement Approval and Dismissal of Claims** – Pursuant to, and in accordance with, Rule 23(e)(2) of the Federal Rules of Civil Procedure, this Court hereby fully and finally approves the Settlement set forth in the Stipulation in all respects (including, without limitation, the amount of the Settlement, the Releases provided for therein, and the dismissal with prejudice of the claims asserted against Defendants in the Action), and finds that the Settlement is, in all respects, fair, reasonable and adequate, and in the best interests of the Settlement Class. Specifically, the Court finds that (a) Lead Plaintiffs and Lead Counsel have adequately represented the Settlement Class; (b) the Settlement was negotiated by the Parties at arm's length; (c) the relief provided for the Settlement Class under the Settlement is adequate taking into account the costs, risks, and delay of trial and appeal, the proposed means of distributing the Settlement Fund to the Settlement Class, and the proposed attorneys' fee award; and (d) the Settlement treats members of the Settlement Class equitably relative to each other. The Parties are directed to implement, perform, and consummate the Settlement in accordance with the terms and provisions contained in the Stipulation.

8. The Action and all of the claims asserted against Defendants in the Action by Lead Plaintiffs and the other Settlement Class Members are hereby dismissed with prejudice as to all Defendants. The Parties shall bear their own costs and expenses, except as otherwise expressly provided in the Stipulation.

9. **Binding Effect** – The terms of the Stipulation and of this Judgment shall be forever binding on Defendants, Lead Plaintiffs, and all other Settlement Class Members (regardless of whether or not any individual Settlement Class Member submits a Claim or seeks or obtains a distribution from the Net Settlement Fund), as well as their respective successors and assigns. The persons listed on Exhibit 1 hereto are excluded from the Settlement Class pursuant to request and are not bound by the terms of the Stipulation or this Judgment.

1 10. **Releases** – The Releases set forth in paragraphs 5 and 6 of the Stipulation, together with the
 2 definitions contained in paragraph 1 of the Stipulation relating thereto, are expressly incorporated herein.
 3 The Releases are effective as of the Effective Date. Accordingly, this Court orders that:

4 (a) Without further action by anyone, and subject to paragraph 11 below, upon the
 5 Effective Date of the Settlement, Lead Plaintiffs and each of the other Settlement Class Members, on behalf
 6 of themselves, and their respective heirs, executors, administrators, predecessors, successors, and assigns,
 7 in their capacities as such, shall be deemed to have, and by operation of law and this Judgment shall have,
 8 fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged
 9 each and every Released Plaintiffs' Claim against Defendants and the other Defendants' Releasees, and
 10 shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiffs' Claims against
 11 any of the Defendants' Releasees. This release shall not apply to any person listed on Exhibit 1 hereto.

12 (b) Without further action by anyone, and subject to paragraph 11 below, upon the
 13 Effective Date of the Settlement, Defendants, on behalf of themselves, and their respective heirs, executors,
 14 administrators, predecessors, successors, and assigns, in their capacities as such, shall be deemed to have,
 15 and by operation of law and of this Judgment shall have, fully, finally, and forever compromised, settled,
 16 released, resolved, relinquished, waived, and discharged each and every Released Defendants' Claim
 17 against Lead Plaintiffs and the other Lead Plaintiffs' Releasees, and shall forever be barred and enjoined
 18 from prosecuting any or all of the Released Defendants' Claims against any of the Lead Plaintiffs'
 19 Releasees. This release shall not apply to any person listed on Exhibit 1 hereto.

20 11. Notwithstanding paragraphs 10 (a) – (b) above, nothing in this Judgment shall bar any
 21 action by any of the Parties to enforce or effectuate the terms of the Stipulation or this Judgment.

22 12. **Rule 11 Findings** – The Court finds and concludes that the Parties and their respective
 23 counsel have complied in all respects with the requirements of Rule 11 of the Federal Rules of Civil
 24 Procedure in connection with the institution, prosecution, defense, and settlement of the Action.

25 13. **No Admissions** – Neither this Judgment, the Term Sheet, the Stipulation (whether or not
 26 consummated), including the exhibits thereto and the Plan of Allocation contained therein (or any other
 27 plan of allocation that may be approved by the Court), the Parties' mediation and subsequent Settlement,
 28 the communications and/or discussions leading to the execution of the Term Sheet and the Stipulation, nor

any proceedings taken pursuant to or in connection with the Term Sheet, the Stipulation, and/or approval of the Settlement (including any arguments proffered in connection therewith): (a) shall be offered against any of the Defendants' Releasees as evidence of, or construed as, or deemed to be evidence of any presumption, concession, or admission by any of the Defendants' Releasees with respect to the truth of any fact alleged by Lead Plaintiffs or the validity or infirmity of any claim that was or could have been asserted or the deficiency of any defense that has been or could have been asserted in this Action or in any other litigation, or of any liability, negligence, fault, or other wrongdoing of any kind by any of the Defendants' Releasees or in any way referred to for any other reason as against any of the Defendants' Releasees, in any arbitration proceeding or other civil, criminal, or administrative action or proceeding, other than such proceedings as may be necessary to effectuate the provisions of the Stipulation; (b) shall be offered against any of the Lead Plaintiffs' Releasees, as evidence of, or construed as, or deemed to be evidence of any presumption, concession, or admission by any of the Lead Plaintiffs' Releasees that any of their claims are without merit, that any of the Defendants' Releasees had meritorious defenses, or that damages recoverable under the Amended Complaint would not have exceeded the Settlement Amount or with respect to any liability, negligence, fault, or wrongdoing of any kind, or in any way referred to for any other reason as against any of the Lead Plaintiffs' Releasees, in any arbitration proceeding or other civil, criminal, or administrative action or proceeding, other than such proceedings as may be necessary to effectuate the provisions of the Stipulation; or (c) shall be construed against any of the Releasees as an admission, concession, or presumption that the consideration to be given hereunder represents the amount which could be or would have been recovered after trial; *provided, however*, that the Parties and the Releasees and their respective counsel may refer to this Judgment and the Stipulation to effectuate the protections from liability granted hereunder and thereunder or otherwise to enforce the terms of the Settlement.

14. **Retention of Jurisdiction** – Without affecting the finality of this Judgment in any way, this Court retains continuing and exclusive jurisdiction over: (a) the Parties for purposes of the administration, interpretation, implementation, and enforcement of the Settlement; (b) the disposition of the Settlement Fund; (c) any motion for attorneys' fees and/or Litigation Expenses by Lead Counsel in the Action that will be paid from the Settlement Fund; (d) any motion to approve the Plan of Allocation; (e) any motion

1 to approve the Class Distribution Order; and (f) the Settlement Class Members for all matters relating to
2 the Action.

3 15. Separate orders shall be entered regarding approval of a plan of allocation and the motion
4 of Lead Counsel for attorneys' fees and Litigation Expenses. Such orders shall in no way affect or delay
5 the finality of this Judgment and shall not affect or delay the Effective Date of the Settlement.

6 16. **Modification of the Agreement of Settlement** – Without further approval from the Court,
7 Lead Plaintiffs and Defendants are hereby authorized to agree to and adopt such amendments or
8 modifications of the Stipulation or any exhibits attached thereto to effectuate the Settlement that: (a) are
9 not materially inconsistent with this Judgment; and (b) do not materially limit the rights of Settlement Class
10 Members in connection with the Settlement. Without further order of the Court, Lead Plaintiffs and
11 Defendants may agree to reasonable extensions of time to carry out any provisions of the Settlement.

12 17. **Termination of Settlement** – If the Settlement is terminated as provided in the Stipulation
13 or the Effective Date of the Settlement otherwise fails to occur, this Judgment shall be vacated, rendered
14 null and void, and be of no further force and effect, except as otherwise provided by the Stipulation, and
15 this Judgment shall be without prejudice to the rights of Lead Plaintiffs, the other Settlement Class
16 Members, and Defendants, and the Parties shall revert to their respective litigation positions in the Action
17 immediately prior to the execution of the Term Sheet on December 20, 2022, as provided in the Stipulation.

18 18. **Entry of Final Judgment** – There is no just reason to delay the entry of this Judgment and
19 immediate entry by the Clerk of the Court is expressly directed.

20 SO ORDERED this _____ day of _____, 2023.

21
22
23
24 _____
The Honorable Susan Illston
United States District Judge
25
26
27
28

Exhibit 1**List of Persons Excluded from the Settlement Class Pursuant to Request**

- | | |
|---|--|
| 1. Edward F. Dash
Highlands Ranch, CO | 15. Donna Cognon
Wakefield, MA |
| 2. Barbara J. Dash
Highlands Ranch, CO | 16. Joshua Mayer
Colorado Springs, CO |
| 3. Daniel A. Padowski
East Amherst, NY | 17. Matthew K. Sommers
Ft. Myers, FL |
| 4. Didier Lavoignat
Tassin-la-Demi-Lune, France | |
| 5. Xavier Bruch
Sant Cugat del Valles, Spain | |
| 6. Patricia A. Garvey
Frederick, MD | |
| 7. Luca Razzi
Rome, Italy | |
| 8. Siobhan M. Caverly
Lake Oswego, OR | |
| 9. Estate of Paul Winicki
c/o Louis Bouldec
Burlington, Ontario, Canada | |
| 10. Märta Hage
Kista, Sweden | |
| 11. Susana Sabadías
Madrid, Spain | |
| 12. Agnes Prince-Crespel
Nozay, France | |
| 13. Dr. Johannes W. Hartmann and
Karin Hartmann
Ergolsbach, Germany | |
| 14. Jean-Marie Fierling
Oermingen, France | |

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE HP INC. SECURITIES LITIGATION

Case No. 3:20-cv-01260-SI

**[PROPOSED] ORDER APPROVING PLAN
OF ALLOCATION OF NET SETTLEMENT
FUND**

CLASS ACTION

This matter came on for hearing on July 28, 2023 (“Settlement Hearing”), on Lead Plaintiffs’ motion to determine whether the proposed plan of allocation of the Net Settlement Fund (“Plan of Allocation”) created by the Settlement achieved in the above-captioned class action (“Action”) should be approved. The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that notice of the Settlement Hearing substantially in the form approved by the Court, which also advised Settlement Class Members of the Plan of Allocation, was mailed to all Settlement Class Members who or which could be identified with reasonable effort, and that a summary notice substantially in the form approved by the Court was published in *The Wall Street Journal* and transmitted over *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the proposed Plan of Allocation,

1 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

2 1. This Order approving the proposed Plan of Allocation incorporates by reference the
3 definitions in the Stipulation and Agreement of Settlement dated March 2, 2023 (ECF No. 118-1)
4 (“Stipulation”) and all terms not otherwise defined herein shall have the same meanings as set forth in
5 the Stipulation.

6 2. The Court has jurisdiction to enter this Order approving the proposed Plan of Allocation,
7 and over the subject matter of the Action and all Parties to the Action, including all Settlement Class
8 Members.

9 3. Notice of Lead Plaintiffs’ motion for approval of the proposed Plan of Allocation and of
10 the date for the hearing on such motion was given to all Settlement Class Members who could be
11 identified with reasonable effort. The form and method of notifying the Settlement Class of the motion
12 for approval of the proposed Plan of Allocation satisfied the requirements of Rule 23 of the Federal
13 Rules of Civil Procedure, due process, and all other applicable law and rules, constituted the best notice
14 practicable under the circumstances, and constituted due and sufficient notice to all persons and entities
15 entitled thereto.

16 4. Copies of the Postcard Notice were mailed to over 665,000 potential Settlement Class
17 Members and Nominees. The Notice, which included the Plan of Allocation, was posted on the
18 Settlement Website and mailed to Nominees as well as Settlement Class Members upon request. No
19 objections to the proposed Plan of Allocation were received.

20 5. The Court hereby finds and concludes that the formula for the calculation of the Claims
21 of Claimants as set forth in the Plan of Allocation provides a fair and reasonable basis upon which to
22 allocate the proceeds of the Net Settlement Fund among Settlement Class Members with due
23 consideration having been given to administrative convenience and necessity.

24 6. The Court hereby finds and concludes that the Plan of Allocation is, in all respects, fair
25 and reasonable to the Settlement Class. Accordingly, the Court hereby approves the Plan of Allocation
26 proposed by Lead Plaintiffs.

27 7. Any appeal or any challenge affecting this Court’s approval of the Plan of Allocation
28 shall in no way disturb or affect the finality of the Judgment.

SO ORDERED this _____ day of _____, 2023.

ORDER APPROVING PLAN OF ALLOCATION	3	Case No. 3:20-cv-01260-SI
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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE HP INC. SECURITIES LITIGATION

Case No. 3:20-cv-01260-SI

**[PROPOSED] ORDER AWARDING
ATTORNEYS' FEES AND LITIGATION
EXPENSES**

CLASS ACTION

This matter came on for hearing on July 28, 2023 ("Settlement Hearing"), on Lead Counsel's motion for attorneys' fees and Litigation Expenses. The Court having considered all matters submitted to it at the Settlement Hearing and otherwise; and it appearing that notice of the Settlement Hearing substantially in the form approved by the Court, which advised of Lead Counsel's request for attorneys' fees and Litigation Expenses, was mailed to all Settlement Class Members who or which could be identified with reasonable effort, and that a summary notice substantially in the form approved by the Court was published in *The Wall Street Journal* and transmitted over *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the attorneys' fees and Litigation Expenses requested,

1 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

2 1. This Order incorporates by reference the definitions in the Stipulation and Agreement of
3 Settlement dated March 2, 2023 (ECF No. 118-1) (“Stipulation”), and all terms not otherwise defined
4 herein shall have the same meanings as set forth in the Stipulation.

5 2. The Court has jurisdiction to enter this Order and over the subject matter of the Action
6 and all Parties to the Action, including all Settlement Class Members.

7 3. Notice of Lead Counsel’s motion for attorneys’ fees and Litigation Expenses was given
8 to all Settlement Class Members who could be identified with reasonable effort. The form and method
9 of notifying the Settlement Class of the motion for attorneys’ fees and Litigation Expenses satisfied the
10 requirements of Rule 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation Reform
11 Act of 1995 (15 U.S.C. § 78u-4(a)(7)), due process, and all other applicable law and rules, constituted
12 the best notice practicable under the circumstances, and constituted due and sufficient notice to all
13 persons and entities entitled thereto.

14 4. Plaintiffs’ Counsel are hereby awarded attorneys’ fees in the amount of ____% of the
15 Settlement Fund (including interest earned at the same rate as the Settlement Fund). Lead Counsel are
16 also hereby awarded \$ _____ for payment of their litigation expenses. These attorneys’ fees
17 and expenses shall be paid from the Settlement Fund and the Court finds these sums to be fair and
18 reasonable. Lead Counsel shall allocate the attorneys’ fees awarded among Plaintiffs’ Counsel in a
19 manner in which they, in good faith, believe reflects the contributions of each counsel to the institution,
20 prosecution, and settlement of the Action.

21 5. In making this award of attorneys’ fees and payment of litigation expenses from the
22 Settlement Fund, the Court has considered and found that:

23 a. The Settlement has created a fund of \$10,500,000 in cash that has been funded
24 into escrow pursuant to the terms of the Stipulation, and that numerous Settlement Class
25 Members who submit acceptable Claims will benefit from the Settlement that occurred because
26 of the efforts of Lead Counsel;
27

b. The fee sought is based on a retainer agreement entered into by Lead Counsel and one of the Lead Plaintiffs at the outset of the litigation and the requested fee has been reviewed and approved as reasonable by Lead Plaintiffs, sophisticated institutional investors that actively supervised the Action, at the conclusion of the Action;

c. Copies of the Postcard Notice were mailed to over 665,000 potential Settlement Class Members and Nominees stating that Lead Counsel would apply for attorneys' fees in an amount not to exceed 18% of the Settlement Fund and payment of Litigation Expenses in an amount not to exceed \$250,000 and no objections to the requested attorneys' fees or Litigation Expenses were submitted;

d. Lead Counsel conducted the litigation and achieved the Settlement with skill, perseverance, and diligent advocacy;

e. The Action raised a number of complex issues;

f. Had Lead Counsel not achieved the Settlement there would remain a significant risk that Lead Plaintiffs and the other members of the Settlement Class may have recovered less or nothing from Defendants;

g. Lead Counsel devoted nearly 9,000 hours, with a lodestar value of approximately \$5.46 million, to achieve the Settlement; and

h. The amount of attorneys' fees awarded and expenses to be paid from the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

6. Lead Plaintiff Iron Workers Local 580 Joint Funds is hereby awarded \$_____ from the Settlement Fund as reimbursement for its reasonable costs and expenses directly related to its representation of the Settlement Class.

7. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgment.

8. Exclusive jurisdiction is hereby retained over the Parties and the Settlement Class Members for all matters relating to this Action, including the administration, interpretation, effectuation or enforcement of the Stipulation and this Order.

6 || SO ORDERED this _____ day of _____, 2023.

28	ORDER AWARDING ATTORNEYS' FEES	4	Case No. 3:20-cv-01260-SI
	AND LITIGATION EXPENSES		