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and the Settlement Class*

[Additional counsel appear on signature page.]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE DOXIMITY, INC. SECURITIES
LITIGATION

Case No. 5:24-cv-02281-NW

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

Judge: Hon. Noël Wise
Courtroom: 3, Fifth Floor
Date: June 10, 2026
Time: 9:00 a.m.

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1 **OTHER AUTHORITIES**

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3 No. 20-639-JLH-CJB, Memorandum (D. Decl. Aug. 22, 2025), ECF No. 1585

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5 No. 4:20-cv-00201-P, Motion (N.D. Tex. Feb. 13, 2026), ECF No. 1575

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1 Lead Plaintiff New York City District Council of Carpenters Pension Fund, on behalf of
2 itself and the Settlement Class, and Lead Counsel respectfully submit this reply brief in further
3 support of (i) Lead Plaintiff’s motion for final approval of the proposed Settlement and approval
4 of the proposed Plan of Allocation (ECF No. 104), and (ii) Lead Counsel’s motion for an award
5 of attorneys’ fees and litigation expenses (ECF No. 105) (together, the “Motions”).¹

6 **ARGUMENT**

7 **I. The Settlement Class’s Positive Reaction Supports Approval of The Motions**

8 In their opening papers, Lead Plaintiff and Lead Counsel demonstrated why the proposed
9 \$31 million Settlement satisfies the criteria for final approval of a class action settlement and the
10 request for attorneys’ fees and Litigation Expenses is fair and reasonable. Since then, the Court-
11 approved Claims Administrator, A.B. Data, Ltd. (“A.B. Data”) has completed an extensive notice
12 program undertaken in accordance with the Court’s Preliminary Approval Order. In response to
13 this notice program, no Settlement Class Member has objected to any aspect of the Settlement, the
14 Plan of Allocation, or the requested fees and expenses. In addition, just two requests for exclusion
15 from the Settlement Class have been received. As discussed further below, this overwhelmingly
16 positive reaction by the Settlement Class represents a significant endorsement of all aspects of the
17 Motions.

18 **A. The Robust Court-Approved Notice Program**

19 Pursuant to the Court’s Preliminary Approval Order, A.B. Data conducted an extensive
20 notice program under Lead Counsel’s supervision, which included mailing the Notice and Claim
21 Form (together, the “Notice Packet”) to 213,216 potential Settlement Class Members and their
22 nominees, publishing the Summary Notice in the *Wall Street Journal* and over the *PR Newswire*,
23 and posting relevant information and documents on a dedicated case website,
24 www.DoximitySecuritiesLitigation.com. See Supplemental Declaration of Eric Miller, attached as

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28 ¹ Unless otherwise defined in this memorandum, all capitalized terms have the meanings defined
in the Stipulation and Agreement of Settlement, dated December 24, 2025 (ECF No. 98-1) (the
“Stipulation”).

1 Ex. 1 (“Supp. Miller Decl.”), ¶ 2; Declaration of Eric Miller (ECF No. 106-4) (“Initial Miller
2 Decl.”), ¶¶ 9, 11.

3 A.B. Data began mailing the Notice Packet to potential Settlement Class Members on
4 March 18, 2023. *See* Initial Miller Decl. ¶¶ 3-5. As of June 3, 2026, A.B. Data had mailed a total
5 of 213,216 Notice Packets. *See* Supp. Miller Decl. ¶ 2. Of that number, 38 Notice Packets, or less
6 than 0.018%, were returned as undeliverable, with no alternative address found. This is
7 substantially less than the undeliverable rate in other cases with comparable notice programs. *See*
8 Supp. Miller Decl. ¶ 3.

9 The Notice to the Settlement Class Members informed them of the terms of the proposed
10 Settlement and Plan of Allocation, and that Lead Counsel would apply for an award of attorneys’
11 fees in an amount not to exceed 25% of the Settlement Fund and payment of Litigation Expenses
12 in an amount not to exceed \$850,000. *See* Notice (Initial Miller Decl., Ex. A) ¶¶ 5, 57. The Notice
13 also advised Settlement Class Members of their right to object to the proposed Settlement, the Plan
14 of Allocation, and/or the request for attorneys’ fees and expenses, or request exclusion from the
15 Settlement Class, and the May 20, 2026 deadline for doing so. *See id.* at 2, ¶¶ 59, 67-68.

16 On May 6, 2026, two weeks prior to the objection and exclusion deadline, Lead Plaintiff
17 and Lead Counsel filed their opening papers in support of the Settlement, Plan of Allocation, and
18 fee and expense request. These papers are available on the public docket (ECF Nos. 104-06) and
19 were promptly posted to the case website, *see* Supp. Miller Decl. ¶ 5, as well as Lead Counsel’s
20 website, www.blbglaw.com. In addition, notice of the Settlement was also provided by Defendants
21 to appropriate federal and state officials pursuant to the Class Action Fairness Act of 2005, 28
22 U.S.C. § 1715(b).

23 Following the extensive notice program, no Settlement Class Member has objected to the
24 Settlement, the Plan of Allocation, or Lead Counsel’s motion for attorneys’ fees and Litigation
25 Expenses (or commented on those motions). Two individual investors have requested exclusion
26 from the Settlement Class and collectively they reported only 250 shares of Doximity common
27 stock purchased during the Class Period. *See* Supp. Miller Decl. ¶ 6 and Exs. 2, 3.
28

B. The Reaction of the Settlement Class Supports Approval of the Settlement

As set forth in Lead Plaintiff's opening motion, the Settlement was achieved after more than two years of hard-fought litigation, which included extensive motion practice and discovery. The Settlement is an excellent result for the Settlement Class, providing an immediate and meaningful recovery without the risks and delay of protracted litigation. *See* Settlement Motion (ECF No. 104) at 9-17.

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). Here, the absence of any objections along with the low number of requests for exclusion further support 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) (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"); *Taafua v. Quantum Glob. Techs., LLC*, 2021 WL 579862, at *7 (N.D. Cal. Feb. 16, 2021) ("The 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.").

Further, the absence of objections from any institutional investors, which have ample means and incentive to object to the Settlement if they deemed it unsatisfactory, is additional 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

1 institutional investors; the lack of objections from such institutions indicates that the settlement is
2 fair and reasonable.”); *In re Facebook, Inc. IPO Sec. & Derivative Litig.*, 343 F. Supp. 3d 394, 410
3 (S.D.N.Y. 2018) (“That not one sophisticated institutional investor objected to the Proposed
4 Settlement is indicia of its fairness.”), *aff’d*, 822 Fed. App’x 40 (2d Cir. 2020); *In re Cathode Ray*
5 *Tube (CRT) Antitrust Litig.*, 2017 WL 2481782, at *4 (N.D. Cal. June 8, 2017) (absence of any
6 objections from institutions means that “the inference that the class approves of the settlement is
7 even stronger”).

8 **C. The Settlement Class’s Reaction Supports Approval of the Fee and Expense**
9 **Request**

10 As set forth in the opening papers, Lead Counsel requests attorneys’ fees of 25% of the
11 Settlement Fund. The requested fee is consistent with the Ninth Circuit’s benchmark fee award, is
12 well within the range of fees awarded in comparable cases, and is supported by the significant time
13 and effort expended by Plaintiffs’ Counsel in this matter. *See* Fee Motion (ECF No. 105), at 5-7,
14 14-17; *see also id.* at 6 (citing, among other cases, *Pokorny v. Quixtar, Inc.*, 2013 WL 3790896, at
15 *1 (N.D. Cal. July 18, 2013) (“The Ninth Circuit uses a 25% baseline in common fund class
16 actions, and ‘in most common fund cases, the award exceeds that benchmark,’ with a 30% award
17 the norm ‘absent extraordinary circumstances that suggest reasons to lower or increase the
18 percentage.’”)).

19 The absence of any objections to the requested attorneys’ fees and Litigation Expenses
20 further supports a finding that the request is fair and reasonable. *See, e.g., Acosta v. Frito-Lay,*
21 *Inc.*, 2018 WL 2088278, at *12 (N.D. Cal. May 4, 2018) (“The absence of objections or
22 disapproval by class members . . . supports the finding that Plaintiffs’ request is reasonable.”);
23 *Destefano*, 2016 WL 537946, at *18 (“the lack of objection by any Class Members” supported the
24 fee requested); *In re Nuvelo, Inc. Sec. Litig.*, 2011 WL 2650592, at *3 (N.D. Cal. July 6, 2011)
25 (finding only one objection to the fee request to be “a strong, positive response from the class,
26 supporting an upward adjustment of the benchmark [fee award]”); *In re Heritage Bond Litig.*, 2005
27 WL 1594403, at *21 (C.D. June 10, 2005) (“The absence of objections or disapproval by class
28 members to Class Counsel’s fee request further supports finding the fee request reasonable.”).

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

10 **II. Claim Process**

11 The Notice informed potential Settlement Class Members that if they wished to participate
12 in the Settlement they must submit a Claim Form to A.B. Data, with supporting documentation,
13 postmarked (if mailed) or received by July 16, 2026. *See* Notice at 2, ¶¶ 32, 45; Claim Form at 1,
14 9. The deadline for submission of claims is still more than six weeks away, and in the experience
15 of Lead Counsel and A.B. Data, a large majority of claimants, particularly claimants who file
16 electronic claims, will submit their claims on or shortly before the deadline. *See* Supp. Miller Decl.
17 ¶ 7. To date, A.B. Data has received 1,582 claims, either by mail or electronically. *Id.* However,
18 as noted, because the claim filing deadline is more than six weeks away, this current number
19 provides no reflection on the total number of claims expected to be received. In the experience of
20 Lead Counsel, the claims filed in cases of this nature typically include the overwhelming majority
21 of the damaged shares. *See, e.g., Okla. Firefighters Pension & Ret. Sys v. Six Flags Entm’t Corp.*,
22 No. 4:20-cv-00201-P, Motion at 5 (N.D. Tex. Feb. 13, 2026), ECF No. 157 (claims accounted for
23 84% of damaged shares); *In re Grand Canyon Educ., Inc. Sec. Litig.*, No. 20-639-JLH-CJB,
24 Memorandum at 1 (D. Decl. Aug. 22, 2025), ECF No. 158 (claims accounted for 97% of damaged
25 shares); *SEB Inv. Mgmt. AB v. Symantec Corp.*, No. 3:18-cv-02902-WHA, Post-Distribution
26 Accounting at 1 (N.D. Cal. Feb. 16, 2023), ECF No. 451 (claims accounted for 96% of damaged
27 shares).

CONCLUSION

For the foregoing reasons and the reasons set forth in their opening papers, Lead Plaintiff and Lead Counsel respectfully request that the Court approve the Settlement and the Plan of Allocation, and approve the motion for attorneys’ fees and litigation expenses. Attached as Appendix A to this Memorandum is a checklist that summarizes the Motions’ compliance with the Northern District of California’s Procedural Guidance for Class Action Settlements. Copies of the (i) proposed Judgment Approving Class Action Settlement, (ii) proposed Order Approving Plan of Allocation of Net Settlement Fund, and (iii) proposed Order Awarding Attorneys’ Fees and Litigation Expenses are attached hereto as Exhibits 2, 3, and 4, respectively, and will be submitted to the Court’s email in Word format.

Dated: June 3, 2026

Respectfully submitted,

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APPENDIX A**CHECKLIST FOR N.D. CAL. PROCEDURAL
GUIDANCE FOR CLASS ACTION SETTLEMENTS****FINAL APPROVAL PAPERS**

N.D. Cal. Procedural Guidance Provision	Where Discussed in Papers
1) CLASS MEMBERS' RESPONSE —The motion for final approval briefing should include information about	
the number of undeliverable class notices and claim packets,	Reply Memo at 2:5-8; Supp. Miller Decl. ¶ 3.
the number of class members who submitted valid claims,	Reply Memo at 5:17-19; Supp. Miller Decl. ¶ 7.
the number of class members who opted out, and	Reply Memo at 1:14-15, 2:25-27; Supp. Miller Decl. ¶ 6.
the number of class members who objected to or commented on the settlement	Reply Memo at 1:12-14, 2:23-25.
2) ATTORNEYS' FEES —All requests for approval of attorneys' fees must include detailed lodestar information, even if the requested amount is based on a percentage of the settlement fund. Declarations of class counsel as to the number of hours spent on various categories of activities related to the action by each biller, together with hourly billing rate information may be sufficient, provided that the declarations are adequately detailed. Counsel should be prepared to submit copies of detailed billing records if the court orders.	Fee Motion (ECF No. 105), at 15:5 – 17:26; Uslander Decl. (ECF No. 106), at ¶¶ 107-110. Uslander Fee Decl. (ECF No. 106-6), at ¶¶ 3-14, 20, and Ex. 1 (summary lodestar chart with rates), Ex. 2 (breakdown of hours by major litigation task). Kaplan Fee Decl. (ECF No. 106-7), at ¶¶ 2-6, and Ex. 1 (summary lodestar chart with rates), Ex. 2 (breakdown of hours by major litigation task).
3) SERVICE AWARDS —All requests for service awards must be supported by evidence of the value provided by the proposed awardees, the risks they undertook in participating, the time they spent on the litigation, and any other justifications for the awards.	Fee Motion (ECF No. 105) at 20:9 – 21:20; Cuggy Decl. (ECF No. 106-2), at ¶¶ 5, 9-12.

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N.D. Cal. Procedural Guidance Provision	Where Discussed in Papers
<p>4) ELECTRONIC VERSIONS—Electronic versions (Microsoft Word or Word Perfect) of all proposed orders and judgments should be submitted to the presiding judge’s Proposed Order (PO) email address at the time they are filed.</p>	<p>The proposed Judgment, proposed Order Approving Plan of Allocation of Net Settlement Fund, and proposed Order Awarding Attorneys’ Fees and Litigation Expenses will be emailed in Word format to nwpo@cand.uscourts.gov.</p>

Exhibit 1

1 **BERNSTEIN LITOWITZ BERGER**
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8 *Counsel for Lead Plaintiff New York City District*
9 *Council of Carpenters Pension Fund and Lead Counsel*
10 *for the Settlement Class*

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14 IN RE DOXIMITY, INC. SECURITIES
15 LITIGATION

16 Case No. 5:24-cv-02281-NW

17 **SUPPLEMENTAL DECLARATION**
18 **OF ERIC MILLER REGARDING**
19 **(I) MAILING OF NOTICE AND**
20 **CLAIM FORM; AND (II) REPORT**
21 **ON REQUESTS FOR EXCLUSION**
22 **RECEIVED**

23 Judge: Hon. Noël Wise
24 Courtroom: 3, Fifth Floor
25 Date: June 10, 2026
26 Time: 9:00 a.m.

1 I, ERIC MILLER, hereby declare under penalty of perjury as follows:

2 1. I am a Senior Vice President of A.B. Data, Ltd.’s Class Action Administration
3 Company (“A.B. Data”). Pursuant to the Court’s Order Granting Preliminary Approval of Class
4 Action Settlement and Providing for Notice of Settlement (ECF No. 102) (“Preliminary Approval
5 Order”), A.B. Data was authorized to act as the Claims Administrator in connection with the
6 Settlement of the above-captioned action.¹ I submit this Declaration as a supplement to my earlier
7 declaration, the Declaration of Eric Miller Regarding (I) Mailing of Notice and Claim Form;
8 (II) Publication of the Summary Notice; and (III) Report on Requests for Exclusion Received to
9 Date (ECF No. 106-4) (the “Initial Mailing Declaration”). The following statements are based on
10 my personal knowledge and information provided by other A.B. Data employees working under my
11 supervision, and if called on to do so, I could and would testify competently thereto.

12 **CONTINUED DISSEMINATION OF THE NOTICE PACKET**

13 2. Since the execution of my Initial Mailing Declaration, A.B. Data has continued to
14 disseminate copies of the Notice and Claim Form (the “Notice Packet”) in response to additional
15 requests from potential members of the Settlement Class, brokers, and nominees. Through June 3,
16 2026, A.B. Data has mailed a total of 213,216 Notice Packets to potential Settlement Class Members
17 and nominees.

18 3. In addition, A.B. Data has re-mailed a total of 58 Notice Packets to persons whose
19 original mailing was returned by the U.S. Postal Service and for whom updated addresses were
20 obtained by A.B. Data. The U.S. Postal Service has returned a total of 38 Notice Packets as
21 undeliverable for which A.B. Data has not been able to obtain an updated address. This number of
22 undeliverable notices—which represents less than 0.018% of the total number of Notice Packets
23 mailed—is lower than the rate of undeliverable notices typically seen in comparable class actions.
24 *See, e.g., In re HP Inc. Sec. Litig.*, Case No. 3:20-cv-01260-SI, Suppl. Decl. of Jack Ewashko at 1
25 (N.D. Cal. Nov. 1, 2023), ECF No. 134-1 (2.7% of notices were undeliverable); *Larkin v. GoPro*,

26
27 ¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation
28 and Agreement of Settlement dated December 24, 2025 (ECF No. 98-1) (the “Stipulation”).

1 *Inc.*, No. 4:16-CV-00654-CW. Post-Distribution Accounting (N.D. Cal. July 29, 2020), ECF No.
2 145-1 (6% of notices were undeliverable); *In re Yahoo! Inc. Sec. Litig.*, Case No. 5:17-cv-00373-
3 LHK, Post-Distribution Accounting (N.D. Cal. Apr. 17, 2020), ECF No. 160 (2.4% of notices were
4 undeliverable); *In re RH, Inc. Sec. Litig.*, Case No. 4:17-00554-YGR, Post-Distribution Accounting
5 (N.D. Cal. Apr. 2, 2020), ECF No. 131 (1.7% of notices were undeliverable).

6 **TELEPHONE HELPLINE AND WEBSITE**

7 4. A.B. Data continues to maintain the toll-free telephone number (1-800-254-2939)
8 with an interactive voice response system (“IVR”) and live operators during business hours to
9 accommodate any inquiries from potential members of the Settlement Class. Since the
10 administration began on March 18, 2026, A.B. Data has received 184 in-bound calls, which included
11 2 hours and 9 minutes spent by callers interacting with the IVR and 8 hours and 22 minutes speaking
12 with A.B. Data’s live operators. A.B. Data has made 133 out-bound calls to respond to messages left
13 or to follow up on earlier communications. A.B. Data has also received 142 emails sent to
14 info@DoximitySecuritiesLitigation.com and has sent 142 outgoing emails in connection with this
15 case.

16 5. A.B. Data also continues to maintain the dedicated website for the Action
17 (www.DoximitySecuritiesLitigation.com) to assist potential members of the Settlement Class. On
18 May 7, 2026, A.B. Data posted to the website copies of the papers filed in support of the motion for
19 final approval of the Settlement and Plan of Allocation and in support of Lead Counsel’s motion for
20 attorneys’ fees and expenses. A.B. Data will continue maintaining and, as appropriate, updating the
21 website and toll-free telephone number until the conclusion of the administration.

22 **REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

23 6. The Notice informed potential Settlement Class Members that requests for exclusion
24 from the Settlement Class were to be mailed or otherwise delivered, addressed to *Doximity Securities*
25 *Litigation*, EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217, such that
26 they were received by A.B. Data no later than May 20, 2026. A.B. Data has been monitoring all mail
27 delivered to that post office box. As of the date of this declaration, A.B. Data has received two (2)
28 requests for exclusion from the Settlement Class, both of which were received on or before May 20,

1 2026 deadline. A list of the individuals requesting exclusion from the Settlement Class and their city
2 and state is attached hereto as Exhibit 1. Copies of the requests for exclusion are attached hereto as
3 Exhibits 2 and 3. In the interest of privacy, the requests for exclusion have been redacted to remove
4 the requesters' street address, telephone number, and email address.

5 **REPORT ON CLAIMS RECEIVED TO DATE**

6 7. The Notice also informed potential members of the Settlement Class that if they
7 wished to be eligible for a payment from the Settlement they must submit a Claim Form to A.B.
8 Data, with supporting documentation, postmarked (if mailed) or submitted on-line by July 16, 2026.
9 In A.B. Data's experience, the large majority of claimants, and in particular, claimants who file
10 electronic claims, tend to submit their claims on or shortly before the deadline. As of June 3, 2026,
11 A.B. Data has received 1,582 claims by mail or electronically. A.B. Data will need to review and
12 process the claims received and supporting documentation submitted with the claims to determine
13 their validity.

14 I declare under penalty of perjury that the foregoing is true and correct to the best of my
15 knowledge.

16 Executed on June 3, 2026.

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19 _____
20 ERIC MILLER
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EXHIBIT 1

Exhibit 1

Number	Full Name	City and State
1	Emil Shakov	Toms River, NJ
2	Gilbert Dlugy, TTE and Monique Dlugy, TTE	Wilmington, NC

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EXHIBIT 2

Doximity - 70082
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A PAPER COPY OF THIS DOCUMENT IS AVAILABLE FOR VIEWING AT THE NATIONAL ARCHIVES

MAY 05 2026

Emil Shakov

Toms River, NJ 08755

Exclusions, c/o A.B. Data, LTD
PO Box 173001
Milwaukee, WI 53217

Re: Exclusion from Class Settlement

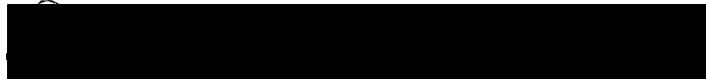
I, Emil Shakov, who duly resides at 1815 New Hampshire Ave, Toms River, NJ 08755 requests exclusion from the Settlement Class in In re Doximity, Inc. Securities Litigation, Case No. 5:24-cv-02281-NW (N.D. Cal.)

I own 250 shares of the common stock purchased during the Class Period.

A handwritten signature in black ink, consisting of a large, stylized 'E' followed by a series of loops and a long horizontal line extending to the right.

Emil Shakov 4/30/2026

Emil Shekar



Toms River NJ 08755

TRENTON NJ 085
1 MAY 2025 PM 4 L



Exclusions
Clo A.B. Data, LTD
PO Box 173001
Milwaukee, WI 53217

53217-801201

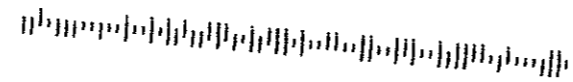


EXHIBIT 3

Doximity - 70082

1003291915



MAY 15 2026

March 8, 2026

Doximity Securities Litigation
C/O A.B. Data, Ltd
P.O. BOX 173117
Milwaukee, WI 53217

Sir,

By means of this letter, we request that you completely and permanently exclude us from this class action: Doximity Securities Litigation.

Please take due note of this.

Done at Wilmington, NC, this 8th day of May 2026, to serve all legal purposes.

A handwritten signature in black ink, appearing to read 'G. Dlugy' with a stylized flourish.

Gilbert DLUGY TTE

A handwritten signature in black ink, appearing to read 'M. Dlugy' with a stylized flourish.

Monique DLUGY TTE

09

GREENSBORO NC 270
PIEDMONT TRIAD AREA
11 MAY 2026 AM 2 L

*Proximity Securities Litigation
c/o A.B. Data, Ltd
P.O. Box 173117
Milwaukee, WI 53217*

53217-813417



Exhibit 2

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE DOXIMITY, INC. SECURITIES
LITIGATION

Case No. 5:24-cv-02281-NW

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

Judge: Hon. Noël Wise
Courtroom: 3, Fifth Floor

WHEREAS, a securities class action is pending in this Court entitled *In re Doximity, Inc. Securities Litigation*, Case No. 5:24-cv-02281-NW (the “Action”);

WHEREAS, (a) Lead Plaintiff New York City District Council of Carpenters Pension Fund (“Lead Plaintiff”), on behalf of itself and the Settlement Class, and (b) Defendants Doximity, Inc. (“Doximity” or the “Company”) and Jeffrey Tangney (together, “Defendants”) have entered into the Stipulation and Agreement of Settlement dated December 24, 2025 (“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;

1 WHEREAS, by Order dated February 25, 2026 (“Preliminary Approval Order”), this Court:
2 (a) found, pursuant to Rule 23(e)(1)(B) of the Federal Rules of Civil Procedure, that it (i) would likely be
3 able to certify the Settlement Class for purposes of the Settlement and (ii) would likely be able to approve
4 the Settlement as fair, reasonable, and adequate under Rule 23(e)(2); (b) ordered that notice of the proposed
5 Settlement be provided to potential Settlement Class Members; (c) provided Settlement Class Members
6 with the opportunity to exclude themselves from the Settlement Class or to object to the proposed
7 Settlement; and (d) scheduled a hearing regarding final approval of the Settlement;

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

9 WHEREAS, the Court conducted a hearing on June 10, 2026 (“Settlement Hearing”) to consider,
10 among other things, (a) whether the terms and conditions of the Settlement are fair, reasonable, and
11 adequate to the Settlement Class, and should therefore be approved; and (b) whether a judgment should be
12 entered dismissing the Action with prejudice as against the Defendants; and

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

16 NOW THEREFORE, IT IS HEREBY ORDERED:

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

20 2. **Incorporation of Settlement Documents** – This Judgment incorporates and makes a part
21 hereof: (a) the Stipulation filed with the Court on December 26, 2025; and (b) the Notice and Summary
22 Notice, both of which were filed with the Court on May 6, 2026.

23 3. **Class Certification for Settlement Purposes** – The Court hereby certifies, for the purposes
24 of the Settlement only, the Action as a class action pursuant to Rules 23(a) and (b)(3) of the Federal Rules
25 of Civil Procedure on behalf of the Settlement Class consisting of all persons who purchased or otherwise
26 acquired Doximity common stock from June 24, 2021 through August 8, 2023, inclusive (“Class Period”),
27 and were damaged thereby. Excluded from the Settlement Class are: (i) Defendants; (ii) any current or
28 former Officers or directors of Doximity; (iii) the Immediate Family members of Defendant Tangney or

1 any current or former Officer or director of Doximity; (iv) any entity that any excluded person owns or
2 controls, or owned or controlled, during the Class Period; and (v) the successors or assigns of any such
3 excluded persons. Also excluded from the Settlement Class are the persons listed on Exhibit 1 hereto who
4 or which are excluded from the Settlement Class pursuant to request.

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 Plaintiff as Class
7 Representative for the Settlement Class and appoints Lead Counsel Bernstein Litowitz Berger &
8 Grossmann LLP as Class Counsel for the Settlement Class. Lead Plaintiff and Lead Counsel have fairly
9 and adequately represented the Settlement Class both in terms of litigating the Action and for purposes of
10 entering into and implementing the Settlement, and have satisfied the requirements of Federal Rules of
11 Civil Procedure 23(a)(4) and 23(g), respectively.

12 5. **Notice** – The Court finds that the dissemination of the Notice and the publication of the
13 Summary Notice: (a) were implemented in accordance with the Preliminary Approval Order;
14 (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.

25 6. **Final Settlement Approval and Dismissal of Claims** – Pursuant to, and in accordance
26 with, Rule 23(e)(2) of the Federal Rules of Civil Procedure, this Court hereby fully and finally approves
27 the Settlement set forth in the Stipulation in all respects (including, without limitation, the amount of the
28 Settlement, the Releases provided for therein, and the dismissal with prejudice of the claims asserted

1 against Defendants in the Action), and finds that the Settlement is, in all respects, fair, reasonable and
2 adequate, and in the best interests of the Settlement Class. Specifically, the Court finds that (a) Lead
3 Plaintiff and Lead Counsel have adequately represented the Settlement Class; (b) the Settlement was
4 negotiated by the Parties at arm's length; (c) the relief provided for the Settlement Class under the
5 Settlement is adequate taking into account the costs, risks, and delay of trial and appeal, the proposed
6 means of distributing the Settlement Fund to the Settlement Class, and the proposed attorneys' fee award;
7 and (d) the Settlement treats members of the Settlement Class equitably relative to each other. The Parties
8 are directed to implement, perform, and consummate the Settlement in accordance with the terms and
9 provisions contained in the Stipulation.

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

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

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

22 (a) Without further action by anyone, and subject to paragraph 10 below, upon the
23 Effective Date of the Settlement, Plaintiffs' Releasers shall be deemed to have, and by operation of law
24 and this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved,
25 relinquished, waived, and discharged each and every Released Plaintiffs' Claim against Defendants and
26 the other Defendants' Releasees, and shall forever be barred and enjoined from prosecuting any or all of
27 the Released Plaintiffs' Claims against any of the Defendants' Releasees. This release shall not apply to
28 any person or entity listed on Exhibit 1 hereto.

1 (b) Without further action by anyone, and subject to paragraph 10 below, upon the
2 Effective Date of the Settlement, Defendants' Releasors shall be deemed to have, and by operation of law
3 and of this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved,
4 relinquished, waived, and discharged each and every Released Defendants' Claim against Lead Plaintiff
5 and the other Plaintiffs' Releasees, and shall forever be barred and enjoined from prosecuting any or all of
6 the Released Defendants' Claims against any of the Plaintiffs' Releasees. This release shall not apply to
7 any person or entity listed on Exhibit 1 hereto.

8 10. Notwithstanding paragraphs 9(a) – (b) above, nothing in this Judgment shall bar any action
9 by any of the Parties to enforce or effectuate the terms of the Stipulation or this Judgment.

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

13 12. **No Admissions** – Neither this Judgment, the Stipulation, including the exhibits thereto and
14 the Plan of Allocation contained therein (or any other plan of allocation that may be approved by the Court),
15 the Parties' mediation and subsequent Settlement, the communications and/or discussions leading to the
16 execution of the Stipulation, nor any proceedings taken pursuant to or in connection with the Stipulation,
17 and/or approval of the Settlement (including any arguments proffered in connection therewith): (a) shall
18 be offered against any of the Defendants' Releasees as evidence of, or construed as, or deemed to be
19 evidence of any presumption, concession, or admission by any of the Defendants' Releasees with respect
20 to the truth of any fact alleged by Lead Plaintiff or the validity of any claim that was or could have been
21 asserted or the deficiency of any defense that has been or could have been asserted in this Action or in any
22 other litigation, or of any liability, negligence, fault, or other wrongdoing of any kind of any of the
23 Defendants' Releasees or in any way referred to for any other reason as against any of the Defendants'
24 Releasees, in any arbitration proceeding or other civil, criminal, or administrative action or proceeding,
25 other than such proceedings as may be necessary to effectuate the provisions of the Stipulation; (b) shall
26 be offered against any of the Plaintiffs' Releasees, as evidence of, or construed as, or deemed to be evidence
27 of any presumption, concession, or admission by any of the Plaintiffs' Releasees that any of their claims
28 are without merit, that any of the Defendants' Releasees had meritorious defenses, or that damages

1 recoverable under the Complaint would not have exceeded the Settlement Amount or with respect to any
2 liability, negligence, fault, or wrongdoing of any kind, or in any way referred to for any other reason as
3 against any of the Plaintiffs' Releasees, in any arbitration proceeding or other civil, criminal, or
4 administrative action or proceeding, other than such proceedings as may be necessary to effectuate the
5 provisions of the Stipulation; or (c) shall be construed against any of the Releasees as an admission,
6 concession, or presumption that the consideration to be given hereunder represents the amount which could
7 be or would have been recovered after trial; *provided, however*, the Parties and the Releasees and their
8 respective counsel may refer to this Judgment and the Stipulation to effectuate the protections from liability
9 granted hereunder and thereunder or otherwise to enforce the terms of the Settlement.

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

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

20 15. **Termination of Settlement** – If the Settlement is terminated as provided in the Stipulation
21 or the Effective Date of the Settlement otherwise fails to occur, this Judgment shall be vacated, rendered
22 null and void, and be of no further force and effect, except as otherwise provided by the Stipulation, and
23 this Judgment shall be without prejudice to the rights of Lead Plaintiff, the other Settlement Class
24 Members, and Defendants, and the Parties shall revert to their respective litigation positions in the Action
25 immediately prior to the execution of the Term Sheet on November 17, 2025, as provided in the Stipulation.
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Exhibit 1

List of Persons and Entities Excluded from the Settlement Class Pursuant to Request

Number	Full Name	City and State
1	Emil Shakov	Toms River, NJ
2	Gilbert Dlugy, TTE and Monique Dlugy, TTE	Wilmington, NC

Exhibit 3

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**IN RE DOXIMITY, INC. SECURITIES
LITIGATION**

Case No. 5:24-cv-02281-NW

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

Judge: Hon. Noël Wise
Courtroom: 3, Fifth Floor

1 WHEREAS, this matter came on for hearing on June 10, 2026 (the “Settlement Hearing”)
2 on Lead Plaintiff’s motion to determine whether the proposed plan of allocation of the Net
3 Settlement Fund (“Plan of Allocation”) created by the Settlement achieved in the above-captioned
4 class action (the “Action”) should be approved. The Court having considered all matters submitted
5 to it at the Settlement Hearing and otherwise; and it appearing that notice of the Settlement Hearing
6 substantially in the form approved by the Court was mailed to all Settlement Class Members who
7 or which could be identified with reasonable effort, and that a summary notice of the hearing
8 substantially in the form approved by the Court was published in *The Wall Street Journal* and
9 transmitted over the *PR Newswire* pursuant to the specifications of the Court; and the Court having
10 considered and determined the fairness and reasonableness of the proposed Plan of Allocation,

11 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

12 1. This Order approving the proposed Plan of Allocation incorporates by reference the
13 definitions in the Stipulation and Agreement of Settlement dated December 24, 2025 (ECF No.
14 98-1) (the “Stipulation”) and all terms not otherwise defined herein shall have the same meanings
15 as set forth in the Stipulation.

16 2. The Court has jurisdiction to enter this Order approving the proposed Plan of
17 Allocation, and over the subject matter of the Action and all parties to the Action, including all
18 Settlement Class Members.

19 3. Notice of Lead Plaintiff’s motion for approval of the proposed Plan of Allocation
20 and of the date for the hearing on such motion was given to all Settlement Class Members who
21 could be identified with reasonable effort. The form and method of notifying the Settlement Class
22 of the motion for approval of the proposed Plan of Allocation satisfied the requirements of Rule
23 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation Reform Act of 1995
24 (15 U.S.C. § 78u-4(a)(7)), due process, and all other applicable law and rules, constituted the best
25 notice practicable under the circumstances, and constituted due and sufficient notice to all persons
26 and entities entitled thereto.

Exhibit 4

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**IN RE DOXIMITY, INC. SECURITIES
LITIGATION**

Case No. 5:24-cv-02281-NW

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

Judge: Hon. Noël Wise
Courtroom: 3, Fifth Floor

1 WHEREAS, this matter came on for hearing on June 10, 2026 (the “Settlement Hearing”)
2 on Lead Counsel’s motion for an award of attorneys’ fees and payment of Litigation Expenses.
3 The Court having considered all matters submitted to it at the Settlement Hearing and otherwise;
4 and it appearing that notice of the Settlement Hearing substantially in the form approved by the
5 Court was mailed to all Settlement Class Members who or which could be identified with
6 reasonable effort, and that a summary notice of the hearing substantially in the form approved by
7 the Court was published in *The Wall Street Journal* and was transmitted over the *PR Newswire*
8 pursuant to the specifications of the Court; and the Court having considered and determined the
9 fairness and reasonableness of the award of attorneys’ fees and Litigation Expenses requested,

10 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

11 1. This Order incorporates by reference the definitions in the Stipulation and
12 Agreement of Settlement dated December 24, 2025 (ECF No. 98-1) (the “Stipulation”) and all
13 terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation.

14 2. The Court has jurisdiction to enter this Order and over the subject matter of the
15 Action and all parties to the Action, including all Settlement Class Members.

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

24 4. Plaintiffs’ Counsel are hereby awarded attorneys’ fees in the amount of 25% of the
25 Settlement Fund (including interest earned on this amount at the same rate as the Settlement Fund).
26 Plaintiffs’ Counsel are also hereby awarded \$673,564.24 for payment of their Litigation Expenses.
27 These attorneys’ fees and expenses shall be paid from the Settlement Fund and the Court finds
28 these sums to be fair and reasonable. Lead Counsel shall allocate the attorneys’ fees awarded

1 among Plaintiffs' Counsel in a manner which it, in good faith, believes reflects the contributions
2 of such counsel to the institution, prosecution, and settlement of the Action.

3 5. Plaintiffs' Counsel shall be paid 90% of the attorneys' fees and 100% of the
4 approved Litigation Expenses immediately upon entry of the Judgment approving the Settlement
5 and this Order. The remaining 10% of the attorneys' fees awarded (and any interest earned thereon)
6 will be paid after Lead Plaintiff conducts the distribution of the Net Settlement Fund to eligible
7 Claimants and files a Post-Distribution Accounting.

8 6. In making this award of attorneys' fees and Litigation Expenses to be paid from the
9 Settlement Fund, the Court has considered and found that:

10 a. The Settlement has created a fund of \$31,000,000 in cash that has been
11 funded into escrow pursuant to the terms of the Stipulation, and that numerous Settlement
12 Class Members who submit acceptable Claim Forms will benefit from the Settlement that
13 occurred because of the efforts of Plaintiffs' Counsel;

14 b. Plaintiffs' Counsel litigated this case on a purely contingent basis, and have
15 not received any compensation for their work on this matter over the last two years;

16 c. The fee sought is consistent with the Ninth Circuit's benchmark fee award
17 in percentage fee cases, *see In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934, 949
18 (9th Cir. 2015);

19 d. The requested fee has been again reviewed and approved as reasonable by
20 Lead Plaintiff, a sophisticated institutional investor that actively supervised the Action;

21 e. Copies of the Notice were mailed to over 213,000 potential Settlement Class
22 Members and nominees stating that Lead Counsel would apply for attorneys' fees for
23 Plaintiffs' Counsel in an amount not to exceed 25% of the Settlement Fund and payment
24 of Litigation Expenses in an amount not to exceed \$850,000 and no objections to the
25 requested award of attorneys' fees or Litigation Expenses were submitted;

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

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

4 h. Plaintiffs' Counsel devoted over 3,900 hours, with a lodestar value of
5 approximately \$3.2 million, to achieve the Settlement, and will continue to perform work
6 on behalf of the Settlement Class in overseeing the Claims Administrator's processing of
7 claims received and the distribution of the Net Settlement Fund; and

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

10 7. Lead Plaintiff New York City District Council of Carpenters Pension Fund is
11 hereby awarded \$12,126.84 from the Settlement Fund for its reasonable costs and expenses
12 directly related to its representation of the Settlement Class.

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

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

19 10. In the event that the Settlement is terminated or the Effective Date of the Settlement
20 otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the
21 Stipulation.

22 11. There is no just reason for delay in the entry of this Order, and immediate entry by
23 the Clerk of the Court is expressly directed.

24 SO ORDERED this _____ day of _____, 2026.

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27 _____
The Honorable Noël Wise
United States District Judge