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

JONNIE HOMYK, et al.,

Plaintiffs,

v.

CHEMOCENTRYX, INC. et al.,

Defendants.

Master File No. 4:21-cv-03343-JST *and
related case*, No. 4:21-cv-04357

**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: Honorable Jon S. Tigar
Date: October 29, 2026
Time: 2:00 p.m.

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Lead Plaintiff Indiana Public Retirement System, on behalf of itself and the Class, and Lead Counsel respectfully submit this reply brief in further support of (i) Lead Plaintiff’s motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation (Dkt. No. 372), and (ii) Lead Counsel’s motion for an award of attorneys’ fees and litigation expenses (Dkt. No. 373) (together, the “Motions”).¹

ARGUMENT

I. The Class’s Uniformly Positive Reaction Supports Approval of The Motions

In their opening papers, Lead Plaintiff and Lead Counsel demonstrated why the proposed \$69 million Settlement satisfies the criteria for final approval of a class action settlement and the request for attorneys’ fees and Litigation Expenses is fair and reasonable. Since then, the Court-approved Claims Administrator, Kroll Settlement Administration LLC (“Kroll”) has completed the extensive notice program that was undertaken in accordance with the Court’s Preliminary Approval Order.

In response to this notice program, no Class Member has objected to any aspect of the Settlement, the Plan of Allocation, or the requested fees and expenses. As discussed further below, the uniformly positive reaction by the Class represents a significant endorsement of all aspects of both of the Motions.

A. The Robust Court-Approved Notice Program

Pursuant to the Court’s Preliminary Approval Order (Dkt. No. 368), the Claims Administrator conducted an extensive notice program under Lead Counsel’s supervision, which included mailing the Postcard Notice to over 77,000 potential Class Members and their nominees, publishing the Summary Settlement Notice in the *Wall Street Journal* and over the *PR Newswire*, and posting the detailed Settlement Notice and Claim Form (“Settlement Notice Packet”), as well as other relevant information and documents on a dedicated case website, www.ChemoCentryxSecuritiesLitigation.com. See Supplemental Declaration of Lindsey

¹ Unless otherwise defined in this memorandum, all capitalized terms have the meanings defined in the Revised Stipulation and Agreement of Settlement, dated May 15, 2026 (Dkt. No. 366-1) (the “Stipulation”).

Marquez, attached as Ex. 1 (“Supp. Marquez Decl.”), ¶ 2; Declaration of Lindsey Marquez (Dkt. No. 374-3) (“Initial Miller Decl.”), ¶¶ 10, 11.

The Claims Administrator began mailing the Postcard Notice to potential Class Members on July 6, 2026. *See* Dkt. No. 374-3 (“Initial Marquez Decl.”) ¶¶ 3-6. As of September 28, 2026, the Claims Administrator had mailed a total of 77,834 Postcard Notices and 1,553 copies of the Settlement Notice Packet to potential Class Members and nominees. *See* Supp. Marquez Decl. ¶ 2. Of the total number of Postcard Notices mailed, just 61, or less than 0.08%, were returned as undeliverable, with no alternative address found. This is substantially less than the undeliverable rate in other cases with comparable notice programs. *Id.* ¶ 3.

The notices disseminated to the Class Members informed them of the terms of the proposed Settlement and that Lead Counsel would apply for an award of attorneys’ fees in an amount not to exceed 22% of the Settlement Fund and payment of Litigation Expenses in an amount not to exceed \$5 million. *See* Postcard Notice (Initial Marquez Decl., Ex. A) at 2; Settlement Notice (Initial Marquez Decl., Ex. B) at ¶¶ 5, 56. The notices also advised Class Members of their right to object to the proposed Settlement, the Plan of Allocation, and/or the request for attorneys’ fees and expenses, or to opt-back into the Class, and the September 21, 2026 deadline for doing so. *See* Postcard Notice at 2; Settlement Notice at 3, ¶¶ 59, 64-65.

On September 10, 2026, Lead Plaintiff and Lead Counsel filed their opening papers in support of the Settlement, Plan of Allocation, and fee and expense request. These papers are available on the public docket (Dkt. Nos. 372-74) and were promptly posted to the case website, www.ChemoCentryxSecuritiesLitigation.com, *see* Supp. Marquez Decl. ¶ 6, as well as Lead Counsel’s website, www.blbglaw.com. In addition, notice of the Settlement was also provided by Defendants to appropriate federal and state officials pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b) on June 16, 2026.

Following the extensive notice program, no Class Member has objected to the Settlement, the Plan of Allocation, or Lead Counsel’s motion for attorneys’ fees and Litigation Expenses (or commented on those motions).

1 In addition, RA Capital Healthcare Fund, L.P. (“RA Capital”), the sole institutional opt-
 2 out in this Action has elected to opt back into the Class in order to participate in the Settlement as
 3 permitted under ¶ 59 of the Settlement Notice and ¶ 13 of the Preliminary Approval Order. *See*
 4 Supp. Marquez Decl. ¶ 8 and Ex. A. RA Capital, which is represented by experienced securities
 5 litigation counsel, had filed its own direct action in May 2024, *see RA Capital Healthcare Fund,*
 6 *L.P. v. ChemoCentryx, Inc.*, No. 24-cv-02645 (N.D. Cal.), and had timely requested exclusion from
 7 the Class in January 2025, *see* Dkt. No. 187-5.

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

9 The Ninth Circuit instructs district courts to consider the reaction of the class in
 10 determining whether to approve a class action settlement. *See Churchill Vill., L.L.C. v. Gen. Elec.*,
 11 361 F.3d 566, 575 (9th Cir. 2004).

12 Here, there were no objections to any aspect of the Settlement. The absence of any such
 13 objections supports a finding that the proposed Settlement is fair, reasonable, and adequate. *See,*
 14 *e.g., Vataj v. Johnson*, 2021 WL 5161927, at *7 (N.D. Cal. Nov. 5, 2021) (the “absence of a large
 15 number of objections to a proposed class action settlement raises a strong presumption that the
 16 terms of a proposed class settlement action are favorable to the class members”); *Taafua v.*
 17 *Quantum Glob. Techs., LLC*, 2021 WL 579862, at *7 (N.D. Cal. Feb. 16, 2021) (“The lack of
 18 objections . . . indicates support among the class members and weighs in favor of approving the
 19 settlement.”); *Giroux v. Essex Prop. Tr., Inc.*, 2019 WL 2106587, at *5 (N.D. Cal. May 14, 2019)
 20 (“The Court finds that the absence of objections . . . indicate[s] overwhelming support among the
 21 Class Members and weigh in favor of approval.”); *Destefano v. Zynga, Inc.*, 2016 WL 537946, at
 22 *13 (N.D. Cal. Feb. 11, 2016) (“By any standard, the lack of objection of the Class Members
 23 favors approval of the Settlement.”); *In re Apollo Grp. Inc. Sec. Litig.*, 2012 WL 1378677, at *3
 24 (D. Ariz. Apr. 20, 2012) (“There have been no objections from Class Members or potential class
 25 members, which itself is compelling evidence that the Proposed Settlement is fair, just, reasonable,
 26 and adequate.”).

C. The Class’s Reaction Supports Approval of the Fee and Expense Request

As set forth in the opening papers, Lead Counsel requests attorneys’ fees of 22% of the Settlement Fund. The requested fee is below the Ninth Circuit’s benchmark fee award, well within the range of fees awarded in comparable cases, and supported by the significant time and effort expended by Lead Counsel in this matter. *See* Fee Motion (Dkt. No. 373) at 4-6, 11-13.

The absence of any objections to the requested attorneys’ fees and Litigation Expenses further supports a finding that the 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 (“the lack of objection by any Class Members” supported the fee requested); *In re Heritage Bond Litig.*, 2005 WL 1594403, at *21 (C.D. June 10, 2005) (“The absence of objections or disapproval by class members to Class Counsel’s fee request further supports finding the fee request reasonable.”).

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.

A copy of the [Revised Proposed] Judgment Approving Class Action Settlement is attached hereto as Exhibit 2. The [Proposed] Order Approving Plan of Allocation of Net Settlement Fund and [Proposed] Order Awarding Attorneys’ Fees and Litigation Expenses were previously submitted to the Court (Dkt. Nos. 374-15, 374-16). In accordance with the Court’s Standing Order for All Civil Cases ¶ L.6.iii, the proposed orders are also being submitted to the Court in Word format.

1 Dated: September 28, 2026

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

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Retirement System and Lead Counsel for the Class*

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 2:7-9; Supp. Marquez Decl. ¶ 3.
the number of class members who submitted valid claims,	Supp. Marquez Decl. ¶ 7
the number of class members who opted out, and	N/A
the number of class members who objected to or commented on the settlement	Reply Memo at 1:14-15, 2:25-27.
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 (Dkt. No. 373) at 11:19 – 15:9; Uslander Decl. (Dkt. No. 374) at ¶¶ 132-135, and Exs. 7-9.
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.	None sought.
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.	The [Revised Proposed] Judgment Approving Class Action Settlement, [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 jstpo@cand.uscourts.gov .

Exhibit 1

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*Counsel for Lead Plaintiff Indiana Public
Retirement System and Lead Counsel for the Class*

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

JONNIE HOMYK, et al.,

Plaintiffs,

v.

CHEMOCENTRYX, INC. et al.,

Defendants.

Master File No. 4:21-cv-03343-JST *and
related case*, No. 4:21-cv-04357

**SUPPLEMENTAL DECLARATION OF
LINDSEY MARQUEZ REGARDING
MAILING OF NOTICE**

Judge: Honorable Jon S. Tigar

Date: October 29, 2026

Time: 2:00 p.m.

1 I, LINDSEY MARQUEZ, hereby declare under penalty of perjury as follows:

2 1. I am a Director of Kroll Settlement Administration LLC (“Kroll”),¹ the Claims
3 Administrator appointed in the above-captioned case, whose principal office is located at One World
4 Trade Center, 285 Fulton Street, 31st Floor, New York, New York 10007. I submit this Declaration
5 as a supplement to my earlier declaration, the Declaration of Lindsey Marquez Regarding Mailing,
6 Posting, and Publication of Settlement Notice (Dkt. No. 374-3) (the “Initial Mailing Declaration”).
7 I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself.
8 The following statements are based on my personal knowledge and information provided by other
9 experienced Kroll employees working under my general supervision, and if called on to do so, I
10 could and would testify competently thereto. The Initial Mailing Declaration is incorporated herein
11 by reference in its entirety.

12 **CONTINUED DISSEMINATION OF SETTLEMENT NOTICES**

13 2. Since the execution of my Initial Mailing Declaration, Kroll has continued to
14 disseminate copies of the Postcard Notice, as well as the Settlement Notice and Claim Form (the
15 “Settlement Notice Packet”) in response to additional requests from potential members of the Class,
16 as well as brokers and other nominees (“Nominees”). As of September 28, 2026, a total of 77,834
17 Postcard Notices and 1,553 Settlement Notice Packets have been mailed or emailed by Kroll or a
18 Nominee to potential Class Members and their nominees.

19 3. The U.S. Postal Service has returned a total of 61 Postcard Notices as undeliverable
20 for which Kroll has not been able to obtain an updated address. This number of undeliverable
21 notices—which represents less than 0.08% of the total number of Postcard Notices mailed—is lower
22 than the rate of undeliverable notices typically seen in comparable class actions. *See, e.g.*, Post-
23 Distribution Accounting at 1, *In re HP Inc. Sec. Litig.*, No. 3:20-cv-01260-SI (N.D. Cal. Sept. 30,
24 2025), Dkt. No. 152 (2.8% of notices were undeliverable); Post-Distribution Accounting at 1, *Larkin*
25 *v. GoPro, Inc.*, No. 4:16-cv-06654-CW (N.D. Cal. July 29, 2020), Dkt. No. 145-1 (6.0% of notices
26

27 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the
28 Revised Stipulation and Agreement of Settlement, filed May 15, 2026 (ECF No. 366-1) (the
“Stipulation”).

1 were undeliverable); Post-Distribution Accounting at 1, *In re Yahoo! Inc. Sec. Litig.*, No. 5:17-cv-
2 00373-LHK (N.D. Cal. Apr. 17, 2020), Dkt. No. 131 (2.4% of notices were undeliverable); Post-
3 Distribution Accounting at 1, *In re RH, Inc. Sec. Litig.*, No. 4:17-cv-00554-YGR (N.D. Cal. Apr. 7,
4 2020), Dkt. No. 160 (1.7% of notices were undeliverable).

5 **TELEPHONE HELPLINE, EMAIL ACCOUNT, AND WEBSITE**

6 4. Kroll continues to maintain the toll-free telephone number (1-833-522-2606) with an
7 interactive voice response system (“IVR”) and live operators during business hours to accommodate
8 any inquiries from potential Class Members. Since the administration of the Settlement began on
9 July 6, 2026, Kroll has received 35 in-bound calls, which included one hour and 12 minutes spent
10 by callers interacting with the IVR and six hours and 23 minutes speaking with live operators. Kroll
11 has made seven out-bound calls to respond to messages left or to follow up on earlier
12 communications.

13 5. Kroll has also received 145 emails sent to
14 info@ChemoCentryxSecuritiesLitigation.com and has sent 134 outgoing emails in connection with
15 this case.

16 6. Kroll also continues to maintain the dedicated website for the Action
17 (www.ChemocentryxSecuritiesLitigation.com) to assist potential Class Members. On September 11,
18 2026, Kroll posted to the website copies of the papers filed in support of the motion for final approval
19 of the Settlement and Plan of Allocation and in support of Lead Counsel’s motion for attorneys’ fees
20 and expenses.

21 7. Kroll will continue maintaining and, as appropriate, updating the website, email
22 account, and toll-free telephone number until the conclusion of the administration.

23 **ELECTION TO OPT BACK INTO CLASS**

24 8. The Postcard Notice and Settlement Notice informed potential Class Members that if
25 they had previously requested exclusion from the Class in connection with the Class Notice
26 disseminated in 2024, they had the option to opt back into the Class and participate in the Settlement
27 by submitting a written request to do so by September 21, 2026. *See* Initial Mailing Declaration
28 (Dkt. No. 374-3), Exhibit A (Postcard Notice) and Exhibit B (Settlement Notice ¶ 59). RA Capital

1 Healthcare Fund, L.P., one of the two persons or entities that had previously requested exclusion
2 from the Class (Dkt. No. 187-5), submitted a letter revoking its prior exclusion request that was
3 received by Kroll on September 15, 2026. A copy of the exclusion revocation letter from RA Capital
4 Healthcare Fund, L.P. is attached hereto as **Exhibit A**.

5 **REPORT ON CLAIMS RECEIVED TO DATE**

6 9. The Notice Postcard and Settlement Notice also informed potential Class Members
7 that if they wished to be eligible for a payment from the Settlement they must submit a Claim Form
8 to Kroll, with supporting documentation, postmarked (if mailed) or submitted online via the
9 Settlement website by October 1, 2026. In Kroll's experience, the large majority of claimants, and
10 in particular, claimants who file electronic claims, tend to submit their claims on or shortly before
11 the deadline.

12 10. As of September 28, 2026, Kroll has received 36 claims by mail and 1,495 claims
13 electronically. This includes approximately 1,247 "bulk" claims, which are submitted by institutions
14 and others on behalf of a multitude of underlying Class Members. Based on Kroll's preliminary
15 analysis, 279 of these Claims appear to be eligible under the Plan of Allocation, the eligible claims
16 include a total of 11,130,103 damaged shares of ChemoCentryx common stock, and the total
17 Recognized Claims for all eligible claims received is approximately \$283,736,073.27.

18 11. The above information is based on Kroll's preliminary review of the Claims received
19 to date and is subject to change as Kroll continues to review claims as they are received. This review
20 process includes (a) a determination of eligibility, e.g., whether the Claimant purchased or otherwise
21 acquired ChemoCentryx common stock during the Class Period, whether duplicate Claims were
22 submitted, or whether the Claimant is excluded from the definition of the Class; (b) the issuance of
23 deficiency notices for Claims that are deficient either in whole or in part, and processing any
24 responses thereto; (c) performing quality assurance during the entirety of the claims administration
25 process; and (d) utilizing a variety of fraud prevention controls throughout the claims review process.
26 As a result of these procedures, the number of valid Claims, damaged shares, and total Recognized
27 Claims set forth above is subject to change.

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

3 Executed on September 28, 2026.

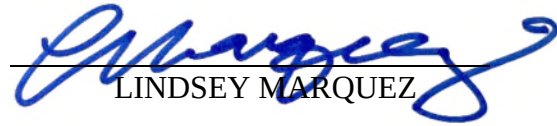
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6 LINDSEY MARQUEZ
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Exhibit A



Nicole T. Castiglione
Partner

300 Executive Drive, Ste. 275
West Orange, NJ 07052
212.597.2820
ncastiglione@rksllp.com

September 15, 2026

VIA FIRST CLASS MAIL

ChemoCentryx Securities Litigation
c/o Kroll Settlement Administration
P.O. Box 5013
New York, New York 10150-5013

83074

COR0000037



RE: Revocation of Prior Exclusion Request, Request to Opt Back Into the Class
***Homyk v. ChemoCentryx, Inc., et al.*, Case No. 4:21-cv-03343 (N.D. Cal.)**

Dear Claims Administrator:

This firm represents RA Capital Healthcare Fund, L.P. ("RA Capital").

On January 6, 2025, RA Capital submitted an exclusion request in connection with the Notice of Pendency of Class Action that was sent out in *Homyk v. ChemoCentryx, Inc., et al.*, Case No. 4:21-cv-03343 (N.D. Cal.).

RA Capital hereby revokes its prior exclusion request, specifically pursuant to Paragraph 59 of the Notice of (I) Proposed Class Action Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Class Notice"). For the avoidance of doubt, RA Capital requests to opt back into the Class in *Homyk v. ChemoCentryx, Inc.*, Master File No. 4:21-cv-03343-JST.

As RA Capital is now a Class Member as defined in Paragraph 28 of the Class Notice, RA Capital will file a claim form with respect to the class settlement. RA Capital otherwise reserves all rights as a Class Member.

RA Capital is represented by counsel. For purpose of this revocation, and any communications with RA Capital, RA Capital's contact information shall be:

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Rolnick Kramer Securities Litigation LLP
300 Executive Drive, Suite 275
West Orange, NJ 07052
212.597.2820
ncastiglione@rksllp.com

Claims Administrator

September 15, 2026

Page 2

RA Capital's contact information is as follows, though RA Capital should be contacted solely through counsel as set forth above:

RA Capital Management, LP
200 Berkeley Street, 18th Floor
Boston, Massachusetts 02116
617.778.2500

This revocation is being signed by Nicole Castiglione, Esq., as counsel to, and as an authorized representative of, RA Capital. I am an attorney with Rolnick Kramer Securities Litigation LLP ("RKS"). RKS signed the original exclusion request and has the authority to revoke that request. RKS has the authority to act on behalf of RA Capital with respect to this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "N. Castiglione".

Nicole T. Castiglione

Nicole T. Castiglione, Esq.
Rolnick Kramer Securities Litigation LLP
300 Executive Drive, Suite 275
West Orange, NJ 07052

CERTIFIED MAIL®



9589 0710 5270 1392 5665 60

Retail

10150

U.S. POSTAGE PAID
FCM LG ENV
NEW YORK, NY 10001
SEP 15, 2026

\$12.18**RDC 99**

S2324E501963-16

FIRST CLASS

ChemoCentryx Securities Litigation
c/o Kroll Settlement Administration
P.O. Box 5013
New York, New York 10150-5013

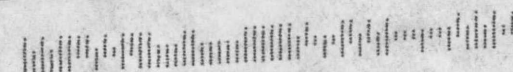
**RETURN RECEIPT
REQUESTED**

Exhibit 2

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Retirement System and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
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JONNIE HOMYK, et al.,

Plaintiffs,

v.

CHEMOCENTRYX, INC. et al.,

Defendants.

Master File No. 4:21-cv-03343-JST *and
related case*, No. 4:21-cv-04357

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

1 WHEREAS, a securities class action is pending in this Court entitled *Homyk v.*
2 *ChemoCentryx, Inc.*, Master File No. 4:21-cv-03343-JST (“Action”);

3 WHEREAS, by Order dated March 6, 2024 (ECF No. 131), this Court certified the Action
4 to proceed as a class action on behalf of all persons who purchased or otherwise acquired the
5 common stock of ChemoCentryx, Inc. (“ChemoCentryx” or the “Company”) from November 26,
6 2019 through May 6, 2021, inclusive (the “Class Period”), and were damaged thereby (“Class”).¹
7 The Court also appointed Lead Plaintiff Indiana Public Retirement System (“Class
8 Representative”) as Class Representative for the Class, and appointed Lead Counsel Bernstein
9 Litowitz Berger & Grossmann LLP as Class Counsel for the Class;

10 WHEREAS, pursuant to the Court’s Order dated October 17, 2024 (ECF No. 179), the
11 Court (a) approved the proposed form and content of the Class Notice to be disseminated to the
12 Class Members to notify them of, among other things: (i) the Action pending against Defendants;
13 (ii) the Court’s certification of the Action to proceed as a class action on behalf of the Class; and
14 (iii) Class Members’ right to request to be excluded from the Class by January 14, 2025, the effect
15 of remaining in the Class or requesting exclusion, and the requirements for requesting exclusion;
16 and (b) approved the method of dissemination of the Class Notice;

17 WHEREAS, the Class Notice was mailed beginning on November 13, 2024 to all potential
18 Class Members who could be identified through reasonable effort, resulting in the mailing of
19 35,220 copies of the Class Notice, and two requests for exclusion from the Class were received by
20 January 14, 2025 (ECF No. 187, at ¶¶ 4-5, 11, 15 & Ex. 5);

21
22
23
24 ¹ Excluded from the Class are (a) Defendants; (b) their respective successors and assigns; (c) the
25 past and current executive officers and directors of Defendants; (d) the Immediate Family
26 Members of Defendant Thomas J. Schall; and (e) the legal representatives, heirs, successors, or
27 assigns of any excluded person, and any entity in which any of the above excluded persons have
28 or had a direct or controlling ownership interest, and the legal representatives, heirs, successors-
in-interest or assigns of any such excluded persons or entities. Also excluded from the Class is the
person listed in Exhibit 1.

1 WHEREAS, on August 15, 2025, the Court issued an Order granting Defendants' motion
2 for summary judgment disposing of the case, ECF No. 345, and on the same day, the Court issued
3 Judgment in favor of Defendants, ECF No. 346, and Class Representative thereafter appealed;

4 WHEREAS, Class Representative, on behalf of itself and the other members of the Class,
5 and Defendants (together with Class Representative, the "Parties") has determined to settle all
6 claims asserted against Defendants in the Action with prejudice on the terms and conditions set
7 forth in the Revised Stipulation and Agreement of Settlement dated May 15, 2026 ("Stipulation"),
8 subject to the approval of this Court ("Settlement");

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

11 WHEREAS, by Order dated June 12, 2026 ("Preliminary Approval Order"), this Court:
12 (a) found, pursuant to Rule 23(e)(1)(B) of the Federal Rules of Civil Procedure, that it would likely
13 be able to approve the Settlement as fair, reasonable, and adequate under Rule 23(e)(2); (b) ordered
14 that notice of the proposed Settlement be provided to potential Class Members; (c) provided Class
15 Members with the opportunity to opt back into the Class if they previously excluded themselves
16 from the Class in connection with Class Notice or to object to the proposed Settlement; and
17 (d) scheduled a hearing regarding final approval of the Settlement;

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

19 WHEREAS, the Court conducted a hearing on October 29, 2026 ("Settlement Hearing")
20 to consider, among other things: (a) whether the terms and conditions of the Settlement are fair,
21 reasonable, and adequate to the Class, and should therefore be approved; and (b) whether a
22 judgment should be entered dismissing the Action with prejudice as against Defendants; and

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

26 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:
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1 1. **Jurisdiction** – The Court has jurisdiction over the subject matter of the Action, and
2 all matters relating to the Settlement, as well as personal jurisdiction over all of the Parties and
3 each of the Class Members.

4 2. **Incorporation of Settlement Documents** – This Judgment incorporates and makes
5 a part hereof: (a) the Stipulation filed with the Court on May 15, 2026; and (b) the Postcard Notice,
6 Settlement Notice, and Summary Settlement Notice, which were filed with the Court on September
7 10, 2026.

8 3. **Notice** – The Court finds that the dissemination and posting of the Postcard Notice
9 and Settlement Notice and the publication of the Summary Settlement Notice: (a) were
10 implemented in accordance with the Preliminary Approval Order; (b) constituted the best notice
11 practicable under the circumstances; (c) constituted notice that was reasonably calculated, under
12 the circumstances, to apprise Class Members of (i) the effect of the proposed Settlement (including
13 the Releases to be provided thereunder); (ii) Class Counsel’s motion for attorneys’ fees and
14 Litigation Expenses; (iii) their right to object to any aspect of the Settlement, the Plan of
15 Allocation, and/or Class Counsel’s motion for attorneys’ fees and Litigation Expenses; (iv) their
16 right to opt back into the Class if they previously excluded themselves from the Class in connection
17 with Class Notice; and (v) their right to appear at the Settlement Hearing; (d) constituted due,
18 adequate, and sufficient notice to all persons and entities entitled to receive notice of the proposed
19 Settlement; and (e) satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure,
20 the United States Constitution (including the Due Process Clause), the Private Securities Litigation
21 Reform Act of 1995, 15 U.S.C. § 78u-4, as amended, and all other applicable law and rules.

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

25 5. **Objections** - The Court has considered each of the objections to the Settlement
26 submitted pursuant to Rule 23(e)(5) of the Federal Rules of Civil Procedure. The Court finds and
27 concludes that each of the objections is without merit, and each is hereby overruled.]

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

14 7. The Action and all of the claims asserted against Defendants in the Action by Class
15 Representative and the other Class Members are hereby dismissed with prejudice. The Parties shall
16 bear their own costs and expenses, except as otherwise expressly provided in the Stipulation.

17 8. **Binding Effect** – The terms of the Stipulation and of this Judgment shall be forever
18 binding on Defendants, Class Representative, and all other Class Members (regardless of whether
19 or not any individual Class Member submits a Claim Form or seeks or obtains a distribution from
20 the Net Settlement Fund), as well as their respective successors and assigns. The person listed on
21 Exhibit 1 hereto is excluded from the Class pursuant to request and is not bound by the terms of
22 the Stipulation or this Judgment.

23 9. **Releases** – The Releases set forth in paragraphs 5 and 6 of the Stipulation, together
24 with the definitions contained in paragraph 1 of the Stipulation relating thereto, are expressly
25 incorporated herein in all respects. The Releases are effective as of the Effective Date.
26 Accordingly, this Court orders that:
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(a) Without further action by anyone, upon the Effective Date of the Settlement, Class Representative and each of the other Class Members, on behalf of themselves, and their respective heirs, executors, administrators, predecessors, successors, assigns, parents, affiliates, representatives, attorneys, and agents, in their capacities as such, shall be deemed to have, and by operation of law and of this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Plaintiff's Claim (including, without limitation, Unknown Claims) against Defendants and the other Defendants' Releasees, and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiff's Claims directly or indirectly against any of the Defendants' Releasees.

(b) Without further action by anyone, upon the Effective Date of the Settlement, Defendants, on behalf of themselves, and their respective heirs, executors, administrators, predecessors, successors, assigns, parents, affiliates, representatives, attorneys, and agents, in their capacities as such, shall be deemed to have, and by operation of law and of this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Defendants' Claim against Class Representative and the other Plaintiff's Releasees, and shall forever be barred and enjoined from prosecuting any or all of the Released Defendants' Claims directly or indirectly against any of the Plaintiff's Releasees. This release shall not apply to the person listed on Exhibit 1.

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

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

1 12. **No Admissions** – Neither this Judgment, the Stipulation (whether or not
2 consummated), including the exhibits thereto and the Plan of Allocation contained therein (or any
3 other plan of allocation that may be approved by the Court), the MOU, the Parties’ mediations and
4 subsequent Settlement, the communications and/or discussions leading to the execution of the
5 Stipulation or the MOU, nor any proceedings taken pursuant to or in connection with the
6 Stipulation or MOU and/or approval of the Settlement (including any arguments proffered in
7 connection therewith):

8 (a) shall be offered against any of the Defendants’ Releasees as evidence of, or
9 construed as, or deemed to be evidence of any presumption, concession, or admission by
10 any of the Defendants’ Releasees with respect to the truth of any fact alleged by Class
11 Representative or the validity of any claim that was or could have been asserted or the
12 deficiency of any defense that has been or could have been asserted in this Action or in any
13 other litigation, or of any liability, negligence, fault, or other wrongdoing of any kind of
14 any of the Defendants’ Releasees, or in any way referred to for any other reason as against
15 any of the Defendants’ Releasees, in any arbitration proceeding or other civil, criminal, or
16 administrative action or proceeding, other than such proceedings as may be necessary to
17 effectuate the provisions of the Stipulation;

18 (b) shall be offered against any of the Plaintiff’s Releasees as evidence of, or
19 construed as, or deemed to be evidence of any presumption, concession, or admission by
20 any of the Plaintiff’s Releasees that any of their claims are without merit, that any of the
21 Defendants’ Releasees had meritorious defenses, or that damages recoverable under the
22 Complaint would not have exceeded the Settlement Amount, or with respect to any
23 liability, negligence, fault, or wrongdoing of any kind, or in any way referred to for any
24 other reason as against any of the Plaintiff’s Releasees, in any arbitration proceeding or
25 other civil, criminal, or administrative action or proceeding, other than such proceedings
26 as may be necessary to effectuate the provisions of the Stipulation; or
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(c) shall be construed against any of the Releasees as an admission, concession, or presumption that the consideration to be given under the Stipulation 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.

13. **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 in the Action that will be paid from the Settlement Fund; (d) any motion to approve the Plan of Allocation; (e) any motion to approve the Class Distribution Order; and (f) the Class Members for all matters relating to the Action.

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

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

16. **Termination of Settlement** – If the Settlement is terminated as provided in the Stipulation or the Effective Date of the Settlement otherwise fails to occur, this Judgment shall be vacated and rendered null and void, and shall be of no further force and effect, except as otherwise

1 provided by the Stipulation, and this Judgment shall be without prejudice to the rights of Class
2 Representative, the other Class Members, and Defendants, and Class Representative and
3 Defendants shall revert to their respective positions in the Action immediately before the execution
4 of the MOU on January 26, 2026, as provided in the Stipulation.

5 17. **Entry of Final Judgment** – There is no just reason to delay the entry of this
6 Judgment as a final judgment in this Action. Accordingly, the Clerk of the Court is expressly
7 directed to immediately enter this final judgment in this Action.

8 SO ORDERED this _____ day of _____, 2026.

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The Honorable Jon S. Tigar
United States District Judge
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Exhibit 1

1. Petrus Bekker
Haiku, HI