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13 *Class Counsel for Lead Plaintiffs Julia and*
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14 [Additional counsel appear on signature page]

15
 16 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 17 **SAN FRANCISCO DIVISION**

18 JULIA JUNGE and RICHARD JUNGE, on
 behalf of themselves and a class of similarly
 19 situated investors,

20 Plaintiffs,

21 v.

22 GERON CORPORATION and JOHN A.
 23 SCARLETT,

24 Defendants.

Case No.: 3:20-cv-00547-WHA

(Consolidated with Case No. 3:20-cv-01163-
 WHA)

(Related to Case No. 3:20-cv-02823, and
 3:22-mc-80051-WHA)

**STIPULATION AND [PROPOSED]
 ORDER REGARDING
 DISSEMINATION OF CLASS NOTICE**

Dept.: Courtroom 12, 9th Floor
 Judge: Honorable William H. Alsup

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1 IT IS HEREBY STIPULATED AND AGREED by the parties, through their undersigned
2 counsel, that, subject to the Court’s approval:

3 1. On April 2, 2022, the Court certified this action as a class action under Rule 23 of the
4 Federal Rules of Civil Procedure (ECF No. 206).

5 2. The Class consists of:

6 All persons who purchased Geron Corporation (“Geron”) common stock during the
7 period from March 19, 2018, to September 16, 2018, inclusive (the “Class Period”),
and who were damaged thereby (the “Class”).

8 Excluded from the Class by definition are:

9 Defendants; directors and officers of Geron; and their families and affiliates.

10 3. The proposed procedures for giving notice to the Class as set forth in this Stipulation
11 and [Proposed] Order comply with the requirements of due process and with Rule 23 of the Federal
12 Rules of Civil Procedure and constitute the best notice practicable under the circumstances.

13 4. The firm of Epiq Class Action & Claims Solutions (“Notice Administrator”) is
14 appointed and authorized to supervise and administer the notice procedure.

15 5. No later than ten (10) business days after the Court’s approval and entry of this
16 Stipulation and Order, Defendant Geron shall produce, or cause its securities agent to produce, to
17 the Notice Administrator (at no cost to Lead Plaintiffs, Class Counsel, the Class or the Notice
18 Administrator) a list in electronic form, of the names and addresses of all persons who purchased
19 Geron common stock at any time during the Class Period (the “Transfer List”).

20 6. No later than twenty-five (25) business days after the Court’s approval and entry of this
21 Stipulation and Order (the “Notice Date”), the Notice Administrator shall send, by first class mail, the
22 agreed-upon proposed Notice of Pendency of Class Action (the “Notice”), substantially in the form
23 attached hereto as Exhibit A, to each person or entity identified on the Transfer List. For all Notices
24 returned as undeliverable, the Notice Administrator shall use best efforts to locate updated addresses.

25 7. The Notice Administrator shall use reasonable efforts to give notice to nominee
26 purchasers such as brokerage firms and other persons and entities who may have purchased Geron
27 common stock during the Class Period for the beneficial interest of persons or entities other than
28 themselves. Such nominees shall either (i) within seven (7) calendar days of receipt of the Notice,

1 request from the Notice Administrator sufficient copies of the Notice to forward to all such beneficial
2 owners and within seven (7) calendar days of receipt of those Notices forward them to all such
3 beneficial owners; or (ii) within seven (7) calendar days of receipt of the Notice, provide a list of the
4 names and addresses of all such beneficial owners to the Notice Administrator and the Notice
5 Administrator is ordered to send the Notice promptly to such identified beneficial owners. Nominees
6 who elect to send the Notice to their beneficial owners shall send a statement to the Notice
7 Administrator confirming that the mailing was made and shall retain their mailing records for use in
8 connection with any further notices that may be provided in the Action. The Notice Administrator
9 shall follow up with brokers and custodians to ensure the Notice is sent to beneficial owners in a
10 timely manner. Upon full and timely compliance with these directions, such nominees may seek
11 reimbursement of their reasonable expenses actually incurred by providing the Notice Administrator
12 with proper documentation supporting the expenses for which reimbursement is sought. Any
13 disputes with respect to the reasonableness or documentation of expenses incurred shall be subject
14 to review by the Court.

15 8. Contemporaneously with the mailing of the Notice, the Notice Administrator shall
16 establish a website for the Action, www.GeronSecuritiesLitigation.com, from which any members
17 of the class (“Class Members”) may download copies of the Notice, the Summary Notice (as
18 described below), the operative Complaint, Geron and Dr. John A. Scarlett’s Answer to the operative
19 Complaint, the Court’s order certifying the Class, and this Stipulation and Order. In addition, Class
20 Counsel shall post the Notice on its website, www.kaplanfox.com.

21 9. Within ten (10) business days after the Notice Date, the Notice Administrator shall cause
22 the Summary Notice of Pendency of Class Action (“Summary Notice”), substantially in the form
23 attached hereto as Exhibit B, to be published in *The Wall Street Journal* and *Investor’s Business Daily*,
24 and to be transmitted over *PR Newswire*.

25 10. The Notice shall provide an address for the purpose of receiving requests for exclusion
26 from Class Members and requests for additional copies of the Notice. The requests for exclusion from
27 Class Members shall be made by submitting a written request for exclusion as set forth in the Notice
28 and shall be postmarked within sixty (60) calendar days after the Notice Date (the “Exclusion Date”).

1 11. The Notice Administrator shall identify and number all exclusion requests received and
2 create copies of those requests for counsel for all parties. The Notice Administrator shall provide via
3 email weekly reports of exclusion requests received to counsel for all parties. The Notice
4 Administrator will maintain original requests in its files.

5 12. No later than fifteen (15) business days after the Exclusion Date, Class Counsel shall
6 file with the Court proof of mailing of the Notice, proof of publication of the Summary Notice, and
7 an affidavit setting forth a list of all persons and entities who have requested exclusion from the Class.

8 13. Except for the costs associated with obtaining Geron's Transfer List, the costs of the
9 notice process shall be borne by Lead Plaintiffs, and not by Defendants.

10 14. This Order may be modified by the Court upon motion by either or both parties, for good
11 cause shown.

12 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

13 Dated: April 18, 2022

KAPLAN FOX & KILSHEIMER LLP

14 By: /s/ Jeffrey P. Campisi
15 *Jeffrey P. Campisi*

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*Class Counsel for Lead Plaintiffs Julia Junge and
Richard Junge and the Class*

1 Dated: April 18, 2022

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23 *Counsel for Defendants Geron Corporation and*
24 *John A. Scarlett*

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1 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

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Dated: _____, 2022

The Honorable Judge William Alsup

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Jeffrey P. Campisi, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of April 2022, at New York, New York.

/s/ Jeffrey P. Campisi
Jeffrey P. Campisi