	Case 3:20-cv-00547-WHA	Document 303	Filed 08/17/23	Page 1 of 43
1 2 3 4 5	KAPLAN FOX & KILSHEIMER L Laurence D. King (SBN 206423) Kathleen A. Herkenhoff (SBN 168562 Blair E. Reed (SBN 316791) 1999 Harrison Street, Suite 1560 Oakland, CA 94612 Telephone: (415) 772-4700 Facsimile: (415) 772-4707 Iking@kaplanfox.com kherkenhoff@kaplanfox.com			
6 7 8 9 10 11	breed@kaplanfox.com KAPLAN FOX & KILSHEIMER L Robert N. Kaplan (admitted pro hac vi Jeffrey P. Campisi (admitted pro hac vice) Jason A. Uris (admitted pro hac vice) 800 Third Avenue, 38th Floor New York, NY 10022 Telephone: (212) 687-1980 Facsimile: (212) 687-7714 rkaplan@kaplanfox.com jcampisi@kaplanfox.com	ice)		
12 13 14	Class Counsel for Lead Plaintiffs Julic Richard Junge and the Class	a Junge and	CT COURT	
15	NORTHERN	DISTRICT OF (FRANCISCO DIV	CALIFORNIA	
16 17 18	JULIA JUNGE and RICHARD JUNG behalf of themselves and a class of sin situated investors, Plaintiffs,	nilarly <u>Clas</u> (Co	e No. 3:20-cv-005 ss <u>Action</u> nsolidated with C 63-WHA)	
19	V.	(Re	lated to Case No.	3:20-cv-02823-WHA;
20	GERON CORPORATION and JOHN	А.	2-mc-80051-WHA	,
21	SCARLETT, Defendants.	STE	EPHANIE AMIN	DECLARATION OF -GIWNER LAIMS RECEIVED
22		ТО	DATE; (II) OBJ	
23		ANA	ALYSIS OF SUP	PLEMENTAL FICE MAILING; (V)
24 25		SET	TLEMENT WE	RVICES AND THE BSITE; (VI) EPIQ
23 26		FEF	ES TO DATE	
27				
28	SUPPLEMENTAL DECLARATION OF RECEIVED TO DATE; (II) OBJECTION SUPPLEMENTAL SETTLEMENT NOTION SETTLEMENT WEBSITE; (VI) EPIQ FEES	NS; (III) REQUEST CE MAILING, (V)	TS FOR EXCLUSIO) CALL CENTER	DN; (IV) ANALYSIS OF SERVICES AND THE

I, Stephanie Amin-Giwner, declare as follows:

1. I am a Director for Epiq Class Action and Claims Solutions, Inc. ("Epiq"). I provide this declaration in further support of Lead Plaintiffs' motion for final approval in the above-captioned action (the "Action") (ECF No. 260) of the Stipulation and Agreement of Settlement dated September 2, 2022 (the "Stipulation" or "Settlement") (ECF No. 247) entered with Defendants Geron Corporation ("Geron") and John A. Scarlett, and to update the Court in advance of the August 24, 2023 hearing. The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision, and if called on to do so, I could and would testify competently thereto.¹ I will be attending the August 24, 2023 hearing at 1:30 p.m. PST if the Court has any additional questions.

2. This Declaration supplements Epiq's prior declarations to the Court concerning our work in connection with the Settlement. Those Settlement related declarations include the following:

- ECF No. 248-4 (the "9/2/22 Amin-Giwner Preliminary Approval Decl.");
- ECF No. 262-8 (the "2/2/23 Mahn Decl.");
- ECF No. 269-1 (the "3/23/23 Supplemental Mahn Decl.");
- ECF No. 273-1 (the "3/29/23 Amin-Giwner Decl.");
- ECF No. 279 (the "4/3/23 Amin-Giwner Decl."); and
- ECF No. 291 (the "Corrected 4/3/23 Amin-Giwner Decl.").
- ECF No. 294 (the "5/2/23 Amin-Giwner Decl.").²

3. Separately, Epiq submitted an affidavit in connection with the Original Class Notice. ECF

No. 244-1 (the "Webb Original Class Notice Affidavit").

¹ Capitalized terms that are not otherwise defined herein shall have the same meaning as set forth in the Stipulation and Agreement of Settlement dated September 2, 2022 (the "Stipulation" or "Settlement") (ECF No. 247). Unless otherwise noted, all emphasis is added, and all internal citations and quotation marks are omitted.

² Citations to "ECF No._" refer to the docket filings in Case No. 3:20-cv-00547-WHA.

^{SUPPLEMENTAL DECLARATION OF STEPHANIE AMIN-GIWNER REGARDING: (I) CLAIMS RECEIVED} TO DATE; (II) OBJECTIONS; (III) REQUESTS FOR EXCLUSION; (IV) ANALYSIS OF SUPPLEMENTAL
SETTLEMENT NOTICE MAILING, (V) CALL CENTER SERVICES AND THE SETTLEMENT WEBSITE; (VI) EPIQ FEES TO DATE - CASE NO. 3:20-CV-00547-WHA

4. I submit this Declaration to provide the Court and the Parties to the Settlement with information regarding, among other things, certain additional information concerning the mailing of the Court-approved Supplemental Settlement Notice not already covered in the 5/2/23 Amin-Giwner Decl. (ECF No. 294), as well as information concerning the updating and expanding of the pre-existing website used for this Action (www.GeronSecuritiesLitigation.com) (the "Settlement Website") and toll-free number dedicated to the Action, and the status of requests for exclusions, objections and claims received to date.

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CLAIM FILING TO DATE

5. As reported in the 3/23/23 Supplemental Mahn Decl. (ECF No. 269-1, ¶22), as of March 23, 2023, Epiq had received 5,908 Proof of Claim and Release Forms ("Submitted Claims") from potential Class Members and brokerage firms, banks, institutions, and other nominees. Since that time, Epiq has received an additional 1,724 Submitted Claims. In total, Epiq has received 7,632 Submitted Claims.

6. Of the total Submitted Claims received through August 17, 2023, 2,219 were filed by or on behalf of institutions and approximately 5,413 claims were submitted by or on behalf of individuals.

7. Based on our preliminary analysis, the 7,632 Submitted Claims represent an approximate total Recognized Loss of \$70,028,833.88 under the Plan of Allocation that Lead Plaintiffs have presented to the Court for approval, and represent 39,287,610 shares of Geron common stock.

8. Epiq has not yet completed its final determination of all Submitted Claims and Epiq is not able to provide final or potential valid recognized loss amounts at this time. Many of the Submitted Claims received to date may contain deficiencies, and Epiq needs additional time to contact those persons or entities filing the Submitted Claims concerning any deficiencies, and to provide them with an opportunity to correct any deficiencies. Additionally, Submitted Claims have not gone through the quality control, quality assurance, or fraud prevention reviews regularly performed by Epiq to ensure validity and accuracy.

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28 SUPPLEMENTAL DECLARATION OF STEPHANIE AMIN-GIWNER REGARDING: (I) CLAIMS RECEIVED TO DATE; (II) OBJECTIONS; (III) REQUESTS FOR EXCLUSION; (IV) ANALYSIS OF SUPPLEMENTAL SETTLEMENT NOTICE MAILING, (V) CALL CENTER SERVICES AND THE SETTLEMENT WEBSITE; (VI) EPIQ FEES TO DATE - CASE NO. 3:20-CV-00547-WHA

II. <u>OBJECTIONS</u>

9. As of August 17, 2023, Epiq has not been informed of any outstanding objections to the Settlement, the Plan of Allocation, or Lead Counsel's Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses and Awards to Lead Plaintiffs for Lost Wages under 15 U.S.C. §78u-4(a)(4).

III. <u>REQUESTS FOR EXCLUSION</u>

10. The Supplemental Settlement Notice informed Class Members that requests for exclusion from the Class must be postmarked no later than 11:59 p.m. PST on July 14, 2023, or submitted online to Epiq no later than 11:59 p.m. PST on July 14, 2023, on the Settlement Website.

11. For those Class Members who mailed their requests for exclusion, the Supplemental Settlement Notice, Interactive Voice Recording (IVR) and Settlement Website directed them to mail it by First-Class U.S. Mail to Geron Securities Litigation, EXCLUSIONS, c/o Epiq Class Action & Claims Solutions, P.O. Box 4574, Portland, OR 97208-4574. The Supplemental Settlement Notice also set forth the information that must be included in each request for exclusion. Epiq monitors all mail delivered to this P.O. Box, well all submissions submitted e-mail online as as by or to www.GeronSecuritiesLitigation.com.

12. Attached hereto as Exhibit A is a list of all persons or entities who have submitted requests for exclusion to Epiq through August 17, 2023, along with any city and state either identified in their exclusion request or set forth in public records or other internal documents available to Epiq. Not all persons or entities listed on Exhibit A provided the documentation requested for exclusion in the Settlement Notice, however, all exclusion requests received by Epiq are included on the list in Exhibit A. If a person or entity submitted a duplicate request for exclusion, their name and address information is only set forth once on the list in Exhibit A. Based on the records available to Epiq provided with certain of these requests for exclusion, at least 31,773 shares of Geron common stock are represented by the requests for exclusion.

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28 SUPPLEMENTAL DECLARATION OF STEPHANIE AMIN-GIWNER REGARDING: (I) CLAIMS RECEIVED TO DATE; (II) OBJECTIONS; (III) REQUESTS FOR EXCLUSION; (IV) ANALYSIS OF SUPPLEMENTAL SETTLEMENT NOTICE MAILING, (V) CALL CENTER SERVICES AND THE SETTLEMENT WEBSITE; (VI) EPIQ FEES TO DATE - CASE NO. 3:20-CV-00547-WHA

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13.The requests for exclusion set forth in Exhibit A were provided in response to either theOriginal Class Notice, the Settlement Notice or the Supplemental Settlement Notice.

14. Specifically, in response to the Original Class Notice, a total of 71 requests for exclusion, representing 78 individuals or entities, were received by Epiq. *See* Webb Original Class Notice Affidavit (ECF No. 244-1, ¶20). By the time the Stipulation was filed with the Court, 74 requests for exclusion were received, covering 81 individuals, and that number is reflected in the submissions previously filed with the Court.

15. As of the March 30, 2023 Settlement Fairness Hearing, requests for exclusion pertaining to the first 106 individuals and entities in Exhibit A, were received by Epiq. *See* 3/23/23 Supplemental Mahn Decl. (ECF No. 269-1, ¶¶34-36). One additional request for exclusion was submitted directly to the Court (ECF No. 264).

16. After the March 30, 2023 Settlement Fairness Hearing, and as of August 17, 2023, Epiq has received an additional 28 requests for exclusion in response to the Supplemental Settlement Notice, which includes 4 duplicates from earlier requests submitted. All of these requests for exclusion were timely (submitted by 11:59 p.m. PST on July 14, 2023).

IV. <u>ADDITIONAL INFORMATION CONCERNING THE MAILING OF THE</u> <u>SUPPLEMENTAL SETTLEMENT NOTICE AFTER SUBMISSION OF THE 5/2/23</u> AMIN-GIWNER DECL.

17. Collectively, Epiq mailed or caused to be mailed (directly or through bulk mailings) a total of 128,761 Supplemental Settlement Notices.

18. Through June 30, 2023, of the 48,305 Supplement Settlement Notices mailed to Broadridge, CIBC, and Goldman Sachs, Epiq received 1,732 Supplemental Settlement Notices that were mailed to potential class members by brokers, and returned as undeliverable by the U.S. Postal Service. Of these undeliverable mailings, 201 of the Supplemental Settlement Notices contained updated forwarding information. As the Supplemental Settlement Notices were returned to Epiq on a rolling basis, Epiq performed address research for the remaining 1,531 potential Class Members where updated

address information was not provided by the U.S. Postal Service. As a result of the address research,
Epiq obtained updated addresses for 413 potential Class Members. Epiq re-mailed these Supplemental
Settlement Notices as the updated address information was obtained. Accordingly, of the 48,305
Supplemental Settlement Notices mailed to brokers, to my knowledge 1,191 were undeliverable.

19. Through August 17, 2023, of the 82,992 Supplement Settlement Notices mailed directly to potential class members by Epiq, 9,628 were returned as undeliverable by the U.S. Postal Service. Of these undeliverable mailings, 215 of the Supplemental Settlement Notices contained updated forwarding information. After conducting address research on the undeliverable records, 671 updated addresses were found. Supplemental Settlement Notices were re-mailed to the 886 updated addresses. Accordingly, of the 82,992 Supplemental Settlement Notices mailed by Epiq, 8,742 were undeliverable.

V.

CONTACT CENTER SERVICES AND WEBSITE UPDATE

20. Epiq continues to maintain the dedicated toll-free phone number for the Settlement, (844) 754-5537 to assist potential Class Members and their nominees with any questions they may have about the Settlement. The toll-free number was included in the Supplemental Settlement Notice. Since inception through August 17, 2023, Epiq has received a total of 2,732 incoming calls to the toll-free number dedicated to this Settlement. Epiq has promptly responded to each telephone inquiry and will continue to address potential Class Members' inquiries. Since the dissemination of the Supplemental Settlement Notice on May 1, 2023, Epiq has received a total of 934 incoming calls to the toll-free number dedicated to this Settlement.

21. Epiq also maintains and monitors an email address established for this Settlement, info@GeronSecuritiesLitigation.com, as well as a P.O. Box dedicated to this Settlement for potential Class Members to submit questions and inquiries via mail and e-mail. Since inception through August 17, 2023, Epiq has received and responded to 957 e-mails and mailed correspondence. Of those that required or requested a response, Epiq promptly responded.

SUPPLEMENTAL DECLARATION OF STEPHANIE AMIN-GIWNER REGARDING: (I) CLAIMS RECEIVED TO DATE; (II) OBJECTIONS; (III) REQUESTS FOR EXCLUSION; (IV) ANALYSIS OF SUPPLEMENTAL SETTLEMENT NOTICE MAILING, (V) CALL CENTER SERVICES AND THE SETTLEMENT WEBSITE; (VI) EPIQ FEES TO DATE - CASE NO. 3:20-CV-00547-WHA

22. Since the dissemination of the Supplemental Settlement Notice on May 1, 2023, Epiq has received and responded to 509 e-mails and mailed correspondence. Of those that required or requested a response, Epiq promptly responded.

23. In addition, Epiq continues to maintain the Settlement Website. The address for the Settlement Website was included in the Supplemental Settlement Notice. Since inception through July 14, 2023 (the claim filing and opt out deadline), there were 17,118 unique visitors to the Settlement Website and 63,549 page views. In addition, of these 63,549 page views, 1,611 were of the downloadable Proof of Claim and Release Form.

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EPIQ'S FEES AND EXPENSES

24. Epiq agreed to be the Claims Administrator for the Settlement in exchange for payment of its fees and expenses, subject to Court approval. As of the date of this declaration, Epiq has provided Lead Counsel with invoices for all of the work Epiq performed with respect to provision of notice and the administration of the Settlement, and authorized the claims administration work described herein.

25. The cost of the administration of the Original Class Notice and the Settlement through July 31, 2023 totals \$817,451.42.

26. Attached as Exhibit B are true and correct copies of Epiq's invoices through July 31, 2023.

27. To date, Epiq has been paid \$159,745.01 from the Settlement Fund under Paragraph 15 of the Settlement Agreement. As set forth in the 2/2/23 Mahn Decl. (ECF No. 262-8, ¶46), this represents full payment for the fees and costs Epiq incurred in connection with the Original Class Notice (described in the 2/2/23 Mahn Decl. as the "Notice of Pendency").

22 28. Epiq has additional work to perform to review the Submitted Claims and ultimately work 23 on the distribution to Class Members. For example, Epiq estimates that the cost of conducting the initial 24 distribution of the Settlement will be approximately \$49,642.00, *see* Exhibit C hereto. At the time of the 25 filing of the anticipated distribution motion, Epiq will ask that its fees and expenses be paid for work 26 already performed, and request a reserve be held in escrow reflecting the estimated cost to distribute.

 <sup>27
 28</sup> SUPPLEMENTAL DECLARATION OF STEPHANIE AMIN-GIWNER REGARDING: (I) CLAIMS RECEIVED
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 28
 TO DATE; (II) OBJECTIONS; (III) REQUESTS FOR EXCLUSION; (IV) ANALYSIS OF SUPPLEMENTAL
 SETTLEMENT NOTICE MAILING, (V) CALL CENTER SERVICES AND THE SETTLEMENT WEBSITE; (VI)
 EPIQ FEES TO DATE - CASE NO. 3:20-CV-00547-WHA

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of August, 2023 at Massapequa Park, New York. Stephanie Amin-Giumer **STEPHANIE AMIN-GIWNER** SUPPLEMENTAL DECLARATION OF STEPHANIE AMIN-GIWNER REGARDING: (I) CLAIMS RECEIVED TO DATE; (II) OBJECTIONS; (III) REQUESTS FOR EXCLUSION; (IV) ANALYSIS OF SUPPLEMENTAL SETTLEMENT NOTICE MAILING, (V) CALL CENTER SERVICES AND THE SETTLEMENT WEBSITE; (VI) EPIQ FEES TO DATE - CASE NO. 3:20-CV-00547-WHA

EXHIBIT A

Appendix 1

2 List of Exclusions 3 Name Citv State Kimberly A Bourque Carlisle PA 1. 4 2. Calvin Hackley Upper Marlboro MD Thomas J Pizzuto and Thomas J. 3. Malvern PA 5 Pizzuto IRA and Thomas J. Pizzuto Roth IRA 6 4. Susan Rothstein Schwimmer New York NY 7 Escondido 5. Wesley Le CA Arpiben Shah Deer Park 6. NY 8 7. Arthur Groome Heath TΧ 8. Richard H Ronan Newark OH 9 9. Sam Karhbet Lafayette LA 10. Robert W Hutchinson Reading PA 10 Marco Tiberii Charlton 11. MA 11 12. Danny Charbonneau Canton TΧ 13. Igor Maksymyuk Irvine CA 12 14. Sudipto Mondal Saint Paul MN 15. **Tammy Davis** New Waterford OH 13 16. Ansamma Saju Paul Philadelphia PA 17. Bruce A Sanders (Retail Acct) Marietta GA 14 18. Matthew F Sanders (Roth IRA) Marietta GA 15 19. Donna L Sanders Marietta GA 20. Joseph M Moscogiuri **Toms River** NJ 16 Darryl J Wolff 21. Cape Coral FL 22. Deborah E Wolff FL Cape Coral 17 Cape Coral 23. Amanda K Wolff FL 24. Ashley Hettinger Cedar Rapids IA 18 25. Jacob Cunningham Kansas City KS 19 Franklin Hare 26. Sterling Heights MI 27. Edward Bonde King of Prussia PA 20 28. **Bob Flick** Crandall TΧ 29. Javad Vahidi Los Angeles CA 21 30. Howard B Brown Hiawassee GA 31. Andrew Shatley Bear DE 22 32. Hanford Quock Castro Valley CA 23 33. Dale Newell Hamburg NY Timothy A Fram Lowell MA 34. 24 Gregory D Isaac 35. Parma MI Iris L Sun 36. Foster City CA 25 37. David A Griffin Stoughton MA 38. Charles D Carter Carrollton OH 26 39. Sandra L Hoffman Temperance MI 27 40. Youngwon Hahn Everett WA 41. Jason Baker Raleigh NC 28 42. Tyler Coleman Whitmore Lake MI

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1	43.	Shahram Safavi	San Diego	CA
	44.	Keith Shuster	Swedesboro	NJ
2	45.	Alex Amor	Eagan	MN
3	46.	Demetrios Liaros	Bradenton	FL
3	47.	Robert Stupar	Chicago	IL
4	48.	William Stupar	Chicago	IL
	49.	William Charles Waldrop	Goochland	VA
5	50.	Janet Lavonne Little	Cedar Bluff	VA
	51.	Sanders Saint Jour	Brooklyn	NY
6	52.	Carol Bratton	Aptos	CA
7	53.	Steven A Demarest	Davie	FL
'	54.	Sherri L Despiegler	Davie	FL
8	55.	Daniel Ruihan Qi	Orlando	FL
	56.	Matt Fina	Cary	IL
9	57.	Preston Jones	Grand Prairie	TX
10	58.	Alexander Dietl	Ithaca	NY
10	59.	Tony Russo	Hueytown	AL
11	60.	Christopher Szoly	Rocky River	OH
	61.	Maurice L Bakke and Maurice L.	Gainesville	VA
12		Bakke Single Account and		
		Maurice L. Bakke and Mary		
13		Bakke JTWROS		
14	62.	Mary Bakke	Gainesville	VA
17	63.	Monty Milne	Phoenixville	PA
15	64.	Duan Zhang	Bristol	CT
	65.	Alvin Laohapant	Silver Spring	MD
16	66.	Michael Hardwick (deceased)	Aiken	SC
17	67.	Patricia W Hardwick (executor)	Aiken	SC
1/	68.	Spencer Wu	Henderson	NV
18	69.	Varghese Xavier	Floral Park	NY
_	70.	Alan Lauver	A 1	80
19	71.	Matthew Stratton	Anderson	SC
20	72. 73.	Piotr Niedzwiedz	Orlando Medina	FL OH
20	73. 74.	Ron Brockway Gary Cornell Woolridge	Smith's Parish	Bermuda
21	74. 75.	Charles B VonCanon III	Mooresville	NC
-1	75. 76.		Lovettsville	VA
22	70.	McKayla Pate Chad Allie	Frisco	TX
	78.	George Brodbeck	Berkeley	Australia
23	78. 79.	Carl J Frank	Osceola	WI
24	80.	Aaron Kurjan	Traverse City	MI
27	81.	Subrina Chowtie	Towson	MD
25	82.	Erin Bramer Landtroop	Dripping Springs	
	83.	Daniel Targonski	Maspeth	NY
26	84.	Timothy Townsend-Gant Sr	Portland	OR
27	85.	Kimbarlie Zimmerman	Brooklyn Park	MN
27	86.	Matthew Johnson	Altoona	PA
28	87.	Andrew Indovina	Fairport	NY
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		[PROPOSED] JUDGMENT A		

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1	88.	Shaila Sadia	Sterling	VA
	89.	Seth Schiffbauer	Phoenix	AZ
2	90.	Stephanie Gray	Goldsboro	NC
2	91.	Victoria Stubbs	Laurel	MD
3	92.	Shane Forler	Wilmington	NC
4	93.	Cagri Yenigun	Savoy	IL
•	94.	Sarah Virden	Ormond Beach	FL
5	95.	Jerry Holick	Plano	TX
	96.	Pietro Hassan Geroli	Montreal	Canada
6	97.	Alex Hernandez-Hualde	Virginia Beach	VA
7	98.	David Lee	Pasadena	CA
'	99.	Larry W Riley	Port St Lucie	FL
8	100.	Mary C Riley	Port St Lucie	FL
	101.	Lim Hock Thong		Singapore
9	102.	Lee Sok Cheng		Singapore
10	103.	Ryan Jentz		
10	104.	James Marcus	Franklin Lakes	NJ
11	105.	Ranjith Kumar Chilumuru	O'Fallon	MO
	106.	Mark A AuBuchon	Marysville	WA
12	107.	Christopher Moraal	Natick	MA
10	108.	Ryan Hubler	Aberdeen	NJ
13	109.	Andrew Morris	Minneapolis	MN
14	110.	Gil Huggins	Seneca	SC
1.	111.	Henry R. Darlington	Tempe	AZ
15	112.	Stanley R. Riddell	Sammamish	WA
10	113.	Richard B. Smith	York	PA
16	114.	Katie Bielecki	D	F I
17	115. 116.	Todd Ousley Robert Jones	Riverview	FL
1 /	110. 117.	Gordon Blair	Dixon	IL
18	117. 118.	Glenn Shepherd	Williamsburg Laverock	VA
1.0	118. 119.	Therese Roth		PA NV
19	119.	Beverly Ann Hutchins	Nyack Brunswick	NY ME
20	120.	Garry Barber	DIUIISWICK	IVIL
20	121.	Rasha Abedi Shekib Ahmad	Charlottesville	VA
21	122.	Ollie Winston Coggin IV	Charlottesville	v / 1
	123.	R. Sundaramoorthi		
22	125.	Mark Larrabee IRA and Mark		
23		Larrabee and Kasey Larrabee	Southington	СТ
23		Joint Brokerage Account	Southington	01
24	126.	Jesus Almaguer		
	127.	Thomas Brueck	Northvale	NJ
25	128.	David John Hobbs (deceased)	Queensland	Australia
26		Matthew David Smith (executor)	Queensland	Australia
26	129.	Tracey Fligg	Tiffin	IA
27	130.	Noah J. Simmons	Lodi	OH
21				
28				
			-11-	Case No. 3:20-cv
		[PROPOSED] JUDGMENT A		
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EXHIBIT B

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Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005	Remit to Epiq Class Action & Clain Dept 0286 503-350-5800 PO Box 120286 Dallas, TX 75312-02		Tax IE Billing questions: ca or ecabilling@epiqg	
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilsheimer LLP	ABA Routing: 12	ilicon Valley B 21140399 300483242	ank (Santa Clara, CA)
850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No. Purchase Order No. Customer No. Currency Contract No. Contract Description Terms of Payment Internal Reference No	End of Case	Invoice Date n Securities Settlement	01/19/2023

Comments Billing Period Start to 10/31/202

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
30	Case Set-up	2	EA	750.0000	1,500.00
31	National Change of Address (\$500 min)	1	EA	500.0000	500.00
33	Address Research	5,840	EA	0.1500	876.00
	Call Center and Webpage Fees				
51	Website Maintenance Charges	2	EA	225.0000	450.00
52	Interactive Voice Response per call	166.610	EA	0.1900	31.66
53	Live Telephone Support per call	696	MIN	1.0500	730.80
54	Monthly Phone System Support	2	EA	175.0000	350.00
70	Website updates	5.700	н	165.0000	940.50
80	Toll-Free Number Setup	1	EA	2,000.0000	2,000.00
95	Email Communication Setup	1	EA	500.0000	500.00
100	Other Class Member Communication	191	EA	0.0500	9.55
	Notification Process Fees				

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Information Invoice No.	90709603	Invoice Date	01/19/2023
Purchase Order No.		e.se Bate	0.,.0,2020
Customer No.	3001764		

Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Epiq Systems

Comments Billing Period Start to 10/31/202

tem	Service	Quantity	Unit	Unit Price	Amount
115	Print/Mail 20-pg Settlement Notice packe	80,730	EA	0.5600	45,208.80
120	Undeliverable mail handling	139	EA	0.2900	40.31
130	Enter Change of Address - Postal Forward	1	EA	0.4500	0.45
135	Print/Fold Notice and Claim w/BRE	125,000	EA	0.0900	11,250.00
	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	2	EA	10.0000	20.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	95.900	Н	165.0000	15,823.50
300	Account Executive/Project Coordinator	56.700	Н	100.0000	5,670.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	89,463.630	DLR	1.0000	89,463.63
N	 Jet Amount				175,365.20
5	Sales Tax				5,045.56
1	Fotal Amount Due				180,410.76



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Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005	Remit to Epiq Class Action & Claim Dept 0286 PO Box 120286 Dallas, TX 75312-028		Tax II Billing questions: cal or ecabilling@epiqgl	D: 93-1210932 II 503-350-5800 obal.com
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilsheimer LLP	ABA Routing: 12 ² Acct No: 33	licon Valley Ba 1 140399 00483242 VBKUS6S	ank (Santa Clara, CA)	
850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No. Purchase Order No. Customer No. Currency Contract No. Contract Description Terms of Payment Internal Reference No	End of Case	Invoice Date	01/17/2023

Comments Billing Period: 11/01/2022 - 11/30/2022

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
40	Initial Data File Standardization	9	EA	150.0000	1,350.00
	Call Center and Webpage Fees				
100	Other Class Member Communication	3	EA	0.0500	0.15
	Notification Process Fees				
120	Undeliverable mail handling	6,450	EA	0.2900	1,870.50
130	Enter Change of Address - Postal Forward	121	EA	0.4500	54.45
135	Print/Fold Notice and Claim w/BRE	25,000	EA	0.0900	2,250.00
	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	6	EA	10.0000	60.00
190	Online Claims	467	EA	0.5500	256.85
200	Individual Paper Claims - Intake and OCR	330	EA	2.2500	742.50
210	Trade Transaction Data Capture	200	EA	0.2500	50.00
220	Internal Claims Audit n Quality Assuranc	10.800	Н	80.0000	864.00
	-				



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Information			
Invoice No.	90709022	Invoice Date	01/17/2023
Purchase Order No.			
Customer No.	3001764		

Epiq Systems **Class Action & Claims Solutions** 10300 SW Allen Blvd. Beaverton, OR 97005

Comments Billing Period: 11/01/2022 - 11/30/2022

ltem	Service	Quantity	Unit	Unit Price	Amount
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	98.300	н	165.0000	16,219.50
290	Technical Support	80.200	н	150.0000	12,030.00
300	Account Executive/Project Coordinator	51.500	н	100.0000	5,150.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	12,603.620	DLR	1.0000	12,603.62
380	Print/Mail 20-pg Settlement Notice packe	10,384	EA	0.5600	5,815.04
410	Interactive Voice Response per call	1,288.680	EA	0.1900	244.85
420	Live Telephone Support per call	3,324	MIN	1.0500	3,490.20
425	Customer Service/Live Operator Bilingual	18	MIN	1.0500	18.90
470	Imaging/Scanning	13,536	EA	0.1200	1,624.32
471	Photocopies	21	PAG	0.1200	2.52
	ADDITIONAL SERVICES				
520	Notice transcription Request	9	EA	1.9500	17.55
530	PR Newswire - 1200 Words	4,270	EA	1.0000	4,270.00
540	Wall Street Journal - 1/6 Page	20,570	EA	1.0000	20,570.00
550	Investor's Business Daily - 1/6 Page	5,237	EA	1.0000	5,237.00
	Claim Processing/Validation Fees				
N	let Amount				94,791.95
S	ales Tax				1,061.30



e	O	47-WHA Document 3	303 Filed 08	8/17/23 Page 18	Page 3 of 3
Epiq Sys Class Ac 10300 S	-	Information Invoice No. Purchase Order No. Customer No.	90709022 3001764	Invoice Date	01/17/2023
Commer Billing Pe	n ts eriod: 11/01/2022 - 11/30/2022				
Item	Service	Quant	ity Unit	Unit Price	Amount



e	DIQ	WHA Document 3	03 Filed 08	9/17/23 Page 19 o	Page 1 of 2
Epiq Sys	stems	Remit to		Tay ID	: 93-1210932
Class Ac	tion & Claims Solutions	Epiq Class Action & Clain	ns Solutions		93-1210932
10300 SW Allen Blvd. Beaverton, OR 97005		Dept 0286 PO Box 120286 Dallas, TX 75312-0286		Billing questions: call 503-350-5800 or ecabilling@epiqglobal.com	
Bill-To		ABA Routing: 12	ilicon Valley B 1140399 300483242	ank (Santa Clara, CA)	
	Jeffrey P. Campisi		SVBKUS6S		
	Kaplan Fox and Kilsheimer LLP 850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No. Purchase Order No.	90709023	Invoice Date	01/17/2023
		Customer No.	3001764		
		Currency	USD		
		Contract No.	40061088		
		Contract Description		n Securities Settlement	
		Terms of Payment	End of Case		
		Internal Reference No	40061088		

Comments Billing Period: 12/01/2022 - 12/31/2022

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
33	Address Research	1,575	EA	0.1500	236.25
	Call Center and Webpage Fees				
52	Interactive Voice Response per call	2,292.430	EA	0.1900	435.56
53	Live Telephone Support per call	3,744	MIN	1.0500	3,931.20
	Notification Process Fees				
115	Print/Mail 20-pg Settlement Notice packe	11	EA	0.5600	6.16
120	Undeliverable mail handling	885	EA	0.2900	256.65
130	Enter Change of Address - Postal Forward	59	EA	0.4500	26.55
	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	11	EA	10.0000	110.00
160	Electronic/Nominee Claims	1	EA	200.0000	200.00
190	Online Claims	441	EA	0.5500	242.55
200	Individual Paper Claims - Intake and OCR	394	EA	2.2500	886.50





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Information			
Invoice No.	90709023	Invoice Date	01/17/2023
Purchase Order No.			
Customer No.	3001764		

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Comments Billing Period: 12/01/2022 - 12/31/2022

Quantity Unit **Unit Price** Amount Item Service 210 Trade Transaction Data Capture 1,731 EA 0.2500 432.75 220 Internal Claims Audit n Quality Assuranc 7.400 Н 80.0000 592.00 230 Electronic/Nominee Claim Processing 39.900 н 60.0000 2,394.00 **PROJECT MANAGEMENT** 280 Account Manager/Project Manager 165.0000 10,560.00 64 Н 290 **Technical Support** 27.600 150.0000 4,140.00 н 300 Account Executive/Project Coordinator 57.600 100.0000 5,760.00 Н **PROJECT OUT-OF-POCKET EXPENSES** 1.0000 330 Postage 1,155.570 DLR 1,155.57 400 Remails 126 ΕA 0.5600 70.56 460 Print/Mail Acknowledgement Notices 499 0.1300 64.87 EΑ 470 Imaging/Scanning 14.176 EA 0.1200 1.701.12 **ADDITIONAL SERVICES** 520 7 Notice transcription Request EΑ 1.9500 13.65 33,215.94 **Net Amount** 257.54 Sales Tax **Total Amount Due** 33,473.48

epie 3:20-cv-00547-V	VHA Document 30	03 Filed 08	3/17/23 Page 21 (Page 1 of 3
Epiq Systems	Remit to		- u	
Class Action & Claims Solutions	Epiq	s Solutions	l ax IL	D: 93-1210932
10300 SW Allen Blvd. Beaverton, OR 97005	Class Action & Claims Solutions Dept 0286 PO Box 120286 Dallas, TX 75312-0286		Billing questions: call 503-350-580 or ecabilling@epiqglobal.com	
		ilicon Valley B 1140399	ank (Santa Clara, CA)	
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilsheimer LLP	Acct No: 33	300483242 VBKUS6S		
850 Third Avenue 14th Floor	Information			
New York NY 10022-7237	Invoice No.	90719070	Invoice Date	02/28/2023
	Purchase Order No.			
	Customer No.	3001764		
	Currency	USD		
	Contract No.	40061088		
	Contract Description	-	n Securities Settlement	
	Terms of Payment	End of Case		
	Internal Reference No	40061088		

Comments

Billing Period: 01/01/2023 - 01/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
33	Address Research	339	EA	0.1500	50.85
	Call Center and Webpage Fees				
51	Website Maintenance Charges	1	EA	225.0000	225.00
52	Interactive Voice Response per call	2,338.850	EA	0.1900	444.38
53	Live Telephone Support per call	4,014	MIN	1.0500	4,214.70
54	Monthly Phone System Support	1	EA	175.0000	175.00
100	Other Class Member Communication	6,417	EA	0.0500	320.85
	Notification Process Fees				
115	Print/Mail 20-pg Settlement Notice packe	4	EA	0.5600	2.24
120	Undeliverable mail handling	376	EA	0.2900	109.04
130	Enter Change of Address - Postal Forward	7	EA	0.4500	3.15
	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	4	EA	10.0000	40.00





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Information			
Invoice No.	90719070	Invoice Date	02/28/2023
Purchase Order No.			
Customer No.	3001764		

Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Comments

Epiq Systems

Billing Period: 01/01/2023 - 01/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
190	Online Claims	469	EA	0.5500	257.95
200	Individual Paper Claims - Intake and OCR	818	EA	2.2500	1,840.50
210	Trade Transaction Data Capture	4,181	EA	0.2500	1,045.25
220	Internal Claims Audit n Quality Assuranc	28.700	н	80.0000	2,296.00
230	Electronic/Nominee Claim Processing	681.200	Н	60.0000	40,872.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	73	Н	165.0000	12,045.00
290	Technical Support	17.300	Н	150.0000	2,595.00
300	Account Executive/Project Coordinator	72.100	н	100.0000	7,210.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	1,331.770	DLR	1.0000	1,331.77
340	Delivery Charges	792.760	EA	1.0000	792.76
400	Remails	7	EA	0.5600	3.92
460	Print/Mail Acknowledgement Notices	696	EA	0.1300	90.48
470	Imaging/Scanning	20,519	EA	0.1200	2,462.28
471	Photocopies	470	PAG	0.1200	56.40
	ADDITIONAL SERVICES				
520	Notice transcription Request	2	EA	1.9500	3.90
N	et Amount				78,488.42
S	ales Tax				462.08



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Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005	Information Invoice No. Purchase Order No. Customer No.	90719070 3001764	Invoice Date	02/28/2023
Comments Billing Period: 01/01/2023 - 01/31/2023				
	Quanti	the Unit	Unit Price	Amount
Item Service Total Amount Due	Quant	ity Unit	Unit Price	Amount 78,950.50



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Epiq Systems	Remit to		Tay IC): 93-1210932
Class Action & Claims Solutions	Epiq Class Action & Claim	s Solutions	Taxil	5.93-1210932
10300 SW Allen Blvd. Beaverton, OR 97005	Dept 0286 PO Box 120286 Dallas, TX 75312-0286		Billing questions: call 503-350-5 or ecabilling@epiqglobal.com	
	Payment by Wire: Bank: Si ABA Routing: 12	ilicon Valley Ba 1140399	ank (Santa Clara, CA)	
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilsheimer LLP	Acct No: 33	00483242 VBKUS6S		
850 Third Avenue 14th Floor	Information	00705000		00/00/0000
New York NY 10022-7237	Invoice No. Purchase Order No.	90725698	Invoice Date	02/28/2023
	Customer No.	3001764		
	Currency	USD		
	Contract No.	40061088		
	Contract Description	-	n Securities Settlement	
	Terms of Payment	End of Case		
	Internal Reference No	40061088		

Comments

Billing Period: 02/01/2023 - 02/28/2023

ltem	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
33	Address Research	446	EA	0.1500	66.90
40	Initial Data File Standardization	1	EA	150.0000	150.00
	Call Center and Webpage Fees				
51	Website Maintenance Charges	1	EA	225.0000	225.00
52	Interactive Voice Response per call	2,252.900	EA	0.1900	428.05
53	Live Telephone Support per call	5,892	MIN	1.0500	6,186.60
54	Monthly Phone System Support	1	EA	175.0000	175.00
70	Website updates	2	Н	165.0000	330.00
100	Other Class Member Communication	58	EA	0.0500	2.90
	Notification Process Fees				
115	Print/Mail 20-pg Settlement Notice packe	161	EA	0.5600	90.16
120	Undeliverable mail handling	173	EA	0.2900	50.17
	Claim Processing/Validation Fees				
					1

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Class Action & Claims Solutions

Epiq Systems

10300 SW Allen Blvd. Beaverton, OR 97005 Page 2 of 3

Information			
Invoice No.	90725698	Invoice Date	02/28/2023
Purchase Order No.			
Customer No.	3001764		

Comments

Billing Period: 02/01/2023 - 02/28/2023

Item	Service	Quantity	Unit	Unit Price	Amount
150	Process Opt-Out Requests	3	EA	10.0000	30.00
160	Electronic/Nominee Claims	70	EA	200.0000	14,000.00
190	Online Claims	942	EA	0.5500	518.10
200	Individual Paper Claims - Intake and OCR	414	EA	2.2500	931.50
210	Trade Transaction Data Capture	4,677	EA	0.2500	1,169.25
220	Internal Claims Audit n Quality Assuranc	152.900	Н	80.0000	12,232.00
230	Electronic/Nominee Claim Processing	279	Н	60.0000	16,740.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	54.200	Н	165.0000	8,943.00
290	Technical Support	2.600	н	150.0000	390.00
300	Account Executive/Project Coordinator	98.200	Н	100.0000	9,820.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	736.070	DLR	1.0000	736.07
460	Print/Mail Acknowledgement Notices	582	EA	0.1300	75.66
470	Imaging/Scanning	18,234	EA	0.1200	2,188.08
471	Photocopies	208	PAG	0.1200	24.96
	ADDITIONAL SERVICES				
520	Notice transcription Request	2	EA	1.9500	3.90
 N	let Amount				75,507.30
S	ales Tax				289.85



Case 3:20-cv-00547-WHA Document 303 Filed 08/17/23 Page 26 「 Page 3 of 3 Information Invoice No. 90725698 Invoice Date 02/28/2023 Purchase Order No. Customer No. 3001764 **Epiq Systems Class Action & Claims Solutions** 10300 SW Allen Blvd. Beaverton, OR 97005 Comments Billing Period: 02/01/2023 - 02/28/2023 Quantity Unit **Unit Price** Amount ltem Service **Total Amount Due** 75,797.15



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epia				Page 1 o
Epiq Systems Class Action & Claims Solutions 0300 SW Allen Blvd. Beaverton, OR 97005	Remit to Epiq Class Action & Claim PO Box 674652 Dallas, TX 75267-465			
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilsheimer I I P	Wire Routing: 04300 ACH Routing: 03120 Acct No: 80265	Bank, N.A. 00096		
Kaplan Fox and Kilsheimer LLP 850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No. Purchase Order No. Customer No. Currency Contract No. Contract Description Terms of Payment Internal Reference No	End of Cas	Invoice Date eron Securities Settlement e	05/15/2023

Comments

Billing Period: 03/01/2023 - 03/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
33	Address Research	88	EA	0.1500	13.20
	Call Center and Webpage Fees				
51	Website Maintenance Charges	1	EA	225.0000	225.00
52	Interactive Voice Response per call	465.230	EA	0.1900	88.39
53	Live Telephone Support per call	1,848	MIN	1.0500	1,940.40
54	Monthly Phone System Support	1	EA	175.0000	175.00
70	Website updates	1.300	Н	165.0000	214.50
	Notification Process Fees				
115	Print/Mail 20-pg Settlement Notice packe	8	EA	0.5600	4.48
120	Undeliverable mail handling	120	EA	0.2900	34.80
130	Enter Change of Address - Postal Forward	3	EA	0.4500	1.35
	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	3	EA	10.0000	30.00
1					





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Information			
Invoice No.	90743973	Invoice Date	05/15/2023
Purchase Order No.			
Customer No.	3001764		

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Comments

Billing Period: 03/01/2023 - 03/31/2023

ltem	Service	Quantity	Unit	Unit Price	Amount
190	Online Claims	1,533	EA	0.5500	843.15
200	Individual Paper Claims - Intake and OCR	10	EA	2.2500	22.50
210	Trade Transaction Data Capture	7,883	EA	0.2500	1,970.75
220	Internal Claims Audit n Quality Assuranc	91.500	н	80.0000	7,320.00
230	Electronic/Nominee Claim Processing	475	Н	60.0000	28,500.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	100.400	Н	165.0000	16,566.00
290	Technical Support	26.500	н	150.0000	3,975.00
300	Account Executive/Project Coordinator	90.800	н	100.0000	9,080.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	209.840	DLR	1.0000	209.84
400	Remails	3	EA	0.5600	1.68
460	Print/Mail Acknowledgement Notices	229	EA	0.1300	29.77
470	Imaging/Scanning	1,885	EA	0.1200	226.20
471	Photocopies	84	PAG	0.1200	10.08
	ADDITIONAL SERVICES				
520	Notice transcription Request	4	EA	1.9500	7.80
	Standard Rates				
570	Executive Management&Testimony	10	Н	375.0000	3,750.00
N	et Amount				75,239.89



Case 3:20-cv-00547-WHA Document 303 Filed 08/17/23 Page 29 Page 3 of 3 Information Invoice No. 90743973 Invoice Date 05/15/2023 Purchase Order No. Customer No. 3001764 **Epiq Systems Class Action & Claims Solutions** 10300 SW Allen Blvd. Beaverton, OR 97005 Comments Billing Period: 03/01/2023 - 03/31/2023 Quantity Unit **Unit Price** Amount ltem Service 28.42 Sales Tax 75,268.31 **Total Amount Due**



	Case 3:20-cv-00547-WHA	Document 303	Filed 08/17/23	
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Epiq Systems	Remit to			
Class Action & Claims Solutions	Epiq	0.1.1	Tax I	D: 93-121093
10300 SW Allen Blvd. Beaverton, OR 97005	Class Action & Claim PO Box 674652 Dallas, TX 75267-46	Bil	ling questions: call 50 ecabilling@epiqgloba	03-350-5800 al.com
Bill-To Jeffrey P. Campisi	Wire Routing: 04300 ACH Routing: 03120 Acct No: 80265	Bank, N.A.)0096		
Kaplan Fox and Kilsheimer LLP 850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No.	90743974	Invoice Date	05/15/2023
	Purchase Order No. Customer No.	3001764		
	Currency	USD		
	Contract No.	40061088		
	Contract Description	-	Securities Settlement	
	Terms of Payment	End of Case		

Comments Billing Period: 04/01/2023 - 04/30/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
33	Address Research	35	EA	0.1500	5.25
	Call Center and Webpage Fees				
51	Website Maintenance Charges	1	EA	225.0000	225.00
52	Interactive Voice Response per call	437.130	EA	0.1900	83.05
53	Live Telephone Support per call	2,082	MIN	1.0500	2,186.10
54	Monthly Phone System Support	1	EA	175.0000	175.00
70	Website updates	2.600	Н	165.0000	429.00
100	Other Class Member Communication	2,130	EA	0.0500	106.50
120	Undeliverable mail handling	39	EA	0.2900	11.31
	Claim Processing/Validation Fees				
190	Online Claims	8	EA	0.5500	4.40
200	Individual Paper Claims - Intake and OCR	7	EA	2.2500	15.75
210	Trade Transaction Data Capture	351	EA	0.2500	87.75





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Information			
Invoice No.	90743974	Invoice Date	05/15/2023
Purchase Order No.			
Customer No.	3001764		

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Comments Billing Period: 04/01/2023 - 04/30/2023

Billing Period	1: 04/01/2023 -	04/30/2023
-		

ltem	Service	Quantity	Unit	Unit Price	Amount
220	Internal Claims Audit n Quality Assuranc	54.200	Н	80.0000	4,336.00
230	Electronic/Nominee Claim Processing	10.750	Н	60.0000	645.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	106.800	н	165.0000	17,622.00
290	Technical Support	13.100	н	150.0000	1,965.00
300	Account Executive/Project Coordinator	63.400	н	100.0000	6,340.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	53,440.409	DLR	1.0000	53,440.41
341	Reimbursed Travel Expenses	879.790	DLR	1.0000	879.79
350	Claimant Research Fees	389.550	DLR	1.0000	389.55
360	Tax Returns and Informational Reporting	1	EA	2,000.0000	2,000.00
460	Print/Mail Acknowledgement Notices	8	EA	0.1300	1.04
470	Imaging/Scanning	230	EA	0.1200	27.60
	ADDITIONAL SERVICES				
490	Proxy List Notification	1,080	EA	1.5700	1,695.60
520	Notice transcription Request	1	EA	1.9500	1.95
	Standard Rates				
570	Executive Management&Testimony	30	н	375.0000	11,250.00
580	Supplemental notices	131,267	EA	0.1040	13,651.77
N	let Amount				 117,574.82



Case 3:20-cv-00547-WHA Document 303 Filed 08/17/23 Page 32 Page 3 of 3 Information Invoice No. 90743974 Invoice Date 05/15/2023 Purchase Order No. Customer No. 3001764 **Epiq Systems Class Action & Claims Solutions** 10300 SW Allen Blvd. Beaverton, OR 97005 Comments Billing Period: 04/01/2023 - 04/30/2023 Quantity Unit **Unit Price** Amount ltem Service 151.06 Sales Tax 117,725.88 **Total Amount Due** _____ _____



	Case 3:20-cv-00547-WHA	Document 303	Filed 08/17/23	Page 33 MAYOICE
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epiq				Page 1 of
Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005	Remit to Epiq Class Action & Claim PO Box 674652 Dallas, TX 75267-465			
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilsheimer LLP	Electronic Payments: Bank: PNC E Wire Routing: 04300 ACH Routing: 03120 Acct No: 80265 SWIFT: PNCC	3ank, N.A. 0096 7607 42445		
850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No. Purchase Order No. Customer No. Currency Contract No. Contract Description Terms of Payment Internal Reference No	90753384 3001764 USD 40061088 Junge v Ge End of Cas 40061088	Invoice Date eron Securities Settlement e	06/26/2023

Comments Billing Period: 05/01/2023 -05/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
31	National Change of Address (\$500 min)	1	EA	500.0000	500.00
33	Address Research	10,335	EA	0.1500	1,550.25
40	Initial Data File Standardization	2	EA	150.0000	300.00
	Call Center and Webpage Fees				
51	Website Maintenance Charges	1	EA	225.0000	225.00
52	Interactive Voice Response per call	3,346.950	EA	0.1900	635.92
53	Live Telephone Support per call	3,174	MIN	1.0500	3,332.70
54	Monthly Phone System Support	1	EA	175.0000	175.00
70	Website updates	3.400	Н	165.0000	561.00
	Notification Process Fees				
115	Print/Mail 20-pg Settlement Notice packe	109	EA	0.5600	61.04
120	Undeliverable mail handling	7,935	EA	0.2900	2,301.15
130	Enter Change of Address - Postal Forward	197	EA	0.4500	88.65
1					





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Information			
Invoice No.	90753384	Invoice Date	06/26/2023
Purchase Order No.			
Customer No.	3001764		

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Comments Billing Period: 05/01/2023 -05/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
item	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	16	EA	10.0000	160.00
190	Online Claims	925	EA	0.5500	508.75
200	Individual Paper Claims - Intake and OCR	59	EA	2.2500	132.75
210	Trade Transaction Data Capture	454	EA	0.2500	113.50
220	Internal Claims Audit n Quality Assuranc	62.560	Н	80.0000	5,004.80
230	Electronic/Nominee Claim Processing	236.250	Н	60.0000	14,175.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	56.400	Н	165.0000	9,306.00
290	Technical Support	27.500	Н	150.0000	4,125.00
300	Account Executive/Project Coordinator	66.800	Н	100.0000	6,680.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	2,797.500	DLR	1.0000	2,797.50
340	Delivery Charges	27.170	EA	1.0000	27.17
400	Remails	1	EA	0.5600	0.56
450	Print/Mail Deficiency and Rejection Noti	2,359	EA	0.5500	1,297.45
460	Print/Mail Acknowledgement Notices	2,417	EA	0.1300	314.21
470	Imaging/Scanning	9,471	EA	0.1200	1,136.52
471	Photocopies	74	PAG	0.1200	8.88
	ADDITIONAL SERVICES				



piq Systems lass Action & Claims Solutions 0300 SW Allen Blvd. eaverton, OR 97005	Information Invoice No. Purchase Order No. Customer No.	90753384 3001764	Invoice Date	06/26/2023
omments illing Period: 05/01/2023 -05/31/2023				
em Service	Quanti	ty Unit	Unit Price	Amoun
em Service 520 Notice transcription Request		12 EA	1.9500	23.40

epiq

	Case 3:20-cv-00547-WHA	Document 303	Filed 08/17/23	
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Epiq Systems	Remit to			
Class Action & Claims Solutions	Epiq Class Action & Claim	a Salutiona	Tax I	D: 93-121093
0300 SW Allen Blvd. Beaverton, OR 97005	PO Box 674652 Dallas, TX 75267-46	E	Billing questions: call 50 or ecabilling@epiqgloba	03-350-5800 al.com
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilshoimor LLP	Wire Routing: 04300 ACH Routing: 03120 Acct No: 80265	Bank, N.A.)0096		
Kaplan Fox and Kilsheimer LLP 850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No. Purchase Order No. Customer No. Currency Contract No.	90761107 3001764 USD 40061088	Invoice Date	06/30/2023
	Contract Description Terms of Payment Internal Reference No		on Securities Settlement	

Comments Billing Period: 06/01/2023 - 06/30/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
33	Address Research	1,650	EA	0.1500	247.50
	Call Center and Webpage Fees				
51	Website Maintenance Charges	1	EA	225.0000	225.00
53	Live Telephone Support per minute	2,081	MIN	1.0500	2,185.05
54	Monthly Phone System Support	1	EA	175.0000	175.00
55	Interactive Voice Response per minute	3,664.520	MIN	0.1900	696.26
70	Website updates	0.300	Н	165.0000	49.50
	Notification Process Fees				
115	Print/Mail 20-pg Settlement Notice packe	574	EA	0.5600	321.44
120	Undeliverable mail handling	1,650	EA	0.2900	478.50
130	Enter Change of Address - Postal Forward	13	EA	0.4500	5.85
	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	6	EA	10.0000	60.00





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90761107 3001764	Invoice Date	06/30/2023
3001764		
3001764		

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Comments

Billing Period: 06/01/2023 - 06/30/2023

Item	Service	Quantity	Unit	Unit Price	Amount
190	Online Claims	237	EA	0.5500	130.35
200	Individual Paper Claims - Intake and OCR	78	EA	2.2500	175.50
210	Trade Transaction Data Capture	526	EA	0.2500	131.50
220	Internal Claims Audit n Quality Assuranc	20	н	80.0000	1,600.00
230	Electronic/Nominee Claim Processing	85.750	Н	60.0000	5,145.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	40	н	165.0000	6,600.00
300	Account Executive/Project Coordinator	90	н	100.0000	9,000.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	1,358.135	DLR	1.0000	1,358.14
400	Remails	3	EA	0.5600	1.68
450	Print/Mail Deficiency and Rejection Noti	291	EA	0.5500	160.05
460	Print/Mail Acknowledgement Notices	73	EA	0.1300	9.49
470	Imaging/Scanning	11,313	EA	0.1200	1,357.56
471	Photocopies	405	PAG	0.1200	48.60
	ADDITIONAL SERVICES				
520	Notice transcription Request	3	EA	1.9500	5.85
	Standard Rates				
580	Supplemental notices	30	EA	0.1040	3.12
N	et Amount				30,170.94



Case 3:20-cv-00547-WHA Document 303 Filed 08/17/23 Page 38 Page 3 of 3 Information Invoice No. 90761107 Invoice Date 06/30/2023 Purchase Order No. Customer No. 3001764 **Epiq Systems Class Action & Claims Solutions** 10300 SW Allen Blvd. Beaverton, OR 97005 Comments Billing Period: 06/01/2023 - 06/30/2023 Quantity Unit **Unit Price** Amount ltem Service 220.44 Sales Tax 30,391.38 **Total Amount Due** _____ _____



Case 3:20-cv-00547-WHA Document 303 Filed 08/17/23 Page 39 014 OiCE

				Page 1 of 3
Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005	Remit to Epiq Class Action & Clain PO Box 674652 Dallas, TX 75267-46): 93-1210932)3-350-5800 Il.com
Bill-To Jeffrey P. Campisi Kaplan Fox and Kilsheimer LLP	Electronic Payments Bank: PNC E Wire Routing: 0430 ACH Routing: 0312 Acct No: 8026 SWIFT: PNCC	Bank, N.A. 00096 07607 542445		
850 Third Avenue 14th Floor New York NY 10022-7237	Information Invoice No. Purchase Order No. Customer No. Currency Contract No. Contract Description Terms of Payment Internal Reference No	End of Cas	eron Securities Settlement e	08/17/2023

Comments

Billing Period: 07/01/2023 - 07/31/2023

Item	Service	Quantity	Unit	Unit Price	Amount
	Case Start up Fees				
33	Address Research	197	EA	0.1500	29.55
	Call Center and Webpage Fees				
51	Website Maintenance Charges	1	EA	225.0000	225.00
53	Live Telephone Support per call	5,040	MIN	1.0500	5,292.00
54	Monthly Phone System Support	1	EA	175.0000	175.00
55	Interactive Voice Response	2,220.200	MIN	0.1900	421.84
100	Other Class Member Communication	2	EA	0.0500	0.10
	Notification Process Fees				
115	Print/Mail 20-pg Settlement Notice packe	48,354	EA	0.5600	27,078.24
120	Undeliverable mail handling	223	EA	0.2900	64.67
130	Enter Change of Address - Postal Forward	8	EA	0.4500	3.60
	Claim Processing/Validation Fees				
150	Process Opt-Out Requests	2	EA	10.0000	20.00





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	mation			
Invoi	ce No.	90770747	Invoice Date	08/17/2023
Purch	nase Order No.			
Custo	omer No.	3001764		

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005

Comments

Billing Period: 07/01/2023 - 07/31/2023

ltem	Service	Quantity	Unit	Unit Price	Amount
190	Online Claims	261	EA	0.5500	143.55
200	Individual Paper Claims - Intake and OCR	89	EA	2.2500	200.25
210	Trade Transaction Data Capture	879	EA	0.2500	219.75
220	Internal Claims Audit n Quality Assuranc	15	Н	80.0000	1,200.00
230	Electronic/Nominee Claim Processing	325	Н	60.0000	19,500.00
	PROJECT MANAGEMENT				
280	Account Manager/Project Manager	24.500	н	165.0000	4,042.50
290	Technical Support	5	н	150.0000	750.00
300	Account Executive/Project Coordinator	81.400	Н	100.0000	8,140.00
	PROJECT OUT-OF-POCKET EXPENSES				
330	Postage	422.836	DLR	1.0000	422.84
350	Claimant Research Fees	52.500	DLR	1.0000	52.50
400	Remails	16	EA	0.5600	8.96
450	Print/Mail Deficiency and Rejection Noti	164	EA	0.5500	90.20
460	Print/Mail Acknowledgement Notices	96	EA	0.1300	12.48
470	Imaging/Scanning	9,742	EA	0.1200	1,169.04
471	Photocopies	193	PAG	0.1200	23.16
	ADDITIONAL SERVICES				
490	Proxy List Notification	1,046	EA	1.5700	1,642.22
	Standard Rates				



EDIQ Case 3:20-cv-00547-V	WHA Document 3	03 Filed 08/1	7/23 Page 41	Page 3 of 3
Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd. Beaverton, OR 97005	Information Invoice No. Purchase Order No. Customer No.	90770747 3001764	Invoice Date	08/17/2023
Comments Billing Period: 07/01/2023 - 07/31/2023				

ltem	Service	Quantity	Unit	Unit Price	Amount
580	Supplemental notices	1	EA	0.1040	0.10
	Net Amount				70,927.55
	Sales Tax				2,612.46
	Total Amount Due				73,540.01



EXHIBIT C



Junge v Geron **Estimate**

Initial Distribution - Estimated Volumes

Checks	3,900
Wires	30
Percentage of Undeliverables	5%
Reissues	100
Duration	12 months

Detailed Estimate

Junge v Geron

Activity	Unit	Rate	Volume	Amount
Enter Change of Address - Postal Forward	Per Address	\$ 0.450	10	\$4.50
Record Undeliverable Mail	Per Piece	\$ 0.290	195	\$56.55
Account Management and Reconciliation	Per Hour	\$ 80.000	3	\$240.00
Website Updates	Per Hour	\$ 165.000	2	\$330.00
Website Hosting	Per Month	\$ 225.000	12	\$2,700.00
IVR Maintenance Fee	Per Month	\$ 175.000	12	\$2,100.00
IVR Minutes of Use	Per Minute	\$ 0.190	7,000	\$1,330.00
Live Agent Minutes of Use	Per Minute	\$ 1.050	10,000	\$10,500.00
Project Manager	Per Hour	\$ 165.000	75	\$12,375.00
Project Coordinator	Per Hour	\$ 100.000	50	\$5,000.00
Claims Analyst	Per Hour	\$ 60.000	80	\$4,800.00
Data Analyst / IT Support	Per Hour	\$ 150.000	10	\$1,500.00
Print 1-image Check with Stub	Per Check	\$ 0.400	3,900	\$1,560.00
Check Run Coordination (w/ 2 Reissue Runs)	Per Hour	\$ 70.000	10	\$700.00
Postage for checks	Per Piece	\$ 0.640	3,900	\$2,496.00
ACH/Wire Payments	Per Wire	\$ 25.000	30	\$750.00
Bank Fees	Per Month	\$ 200.000	6	\$1,200.00
Box Storage (Per Box/Per Month)	N/A	\$ -	0	\$0.00
Photocopies/Delivery	As Incurred	\$ -	0	\$0.00
Scanning and Image Storage	Per Image	\$ -	0	\$0.00
PO Box	Per 6 Months	\$ -	0	\$0.00
Settlement Fund (QSF) Income Tax Return	Per Year	\$ 2,000.000	1	\$2,000.00
				\$ 49,642

Total Estimated Costs