

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-NAR-TAM

**JOINT DECLARATION OF JONATHAN HORNE, ESQ. AND EX KANO S. SAMS II,
ESQ. IN SUPPORT OF: (1) PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION; AND (2) LEAD
COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION EXPENSES**

We, Jonathan Horne and Ex Kano S. Sams II, declare as follows:

1. I, Jonathan Horne, am a partner at the law firm The Rosen Law Firm, P.A. (“Rosen Law”).¹ Rosen Law is one of the Court-appointed Lead Counsel in the above-captioned action (the “Action”). ECF No. 22.

2. I, Ex Kano S. Sams II, am a partner at the law firm Glancy Prongay Wolke & Rotter LLP (“GPWR”) (f/k/a Glancy Prongay & Murray LLP (*see* ECF No. 207)). GPWR is one of the Court-appointed Lead Counsel in the Action. ECF No. 22.

3. We make this declaration based on our personal knowledge and, if called as witnesses, we could and would competently testify to the matters stated herein. We make this declaration solely to provide support for assertions in the Memoranda of Law in Support of the Motions for Final Approval and for an Award of Attorneys’ Fees (“Briefs” and “Motions”), filed herewith, and refer the Court to the Briefs for a fuller account of the facts and procedural history of this case.

Complaints

4. Upon appointment, Lead Counsel comprehensively reviewed Virgin Galactic’s SEC filings, analyst reports about Virgin Galactic, Defendants’ public statements, and copious amounts of publicly available information. Plaintiffs conducted more than 20 witness interviews and obtained a damages report from, and consulted with, a financial economist. They also hired and consulted with a rocket scientist. By painting a fuller picture of what investors would have known about Virgin Galactic, Lead Counsel strengthened the amended complaints, including the First Amended Complaint (“1AC”).

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

5. To draft the Second Amended Complaint (“2AC”), Lead Counsel examined SEC filings, public statements, and public information about Defendants that had been released since the filing of the 1AC. Plaintiffs found that these new events reflected the materialization of risks the 1AC alleged were misleadingly concealed from investors. Thus, Plaintiffs expanded the putative class period to August 2022 and re-examined Virgin Galactic’s SEC filings and public statements and conducted additional witness interviews.

Discovery

6. Lead Counsel served three sets of requests for production, four sets of interrogatories, and one set of requests for admission (containing 97 requests). Plaintiffs also served six subpoena *duces tecum* on third parties. Defendants propounded two sets of interrogatories and two sets of requests for production of documents upon Plaintiffs. The Parties held more than a dozen meet-and-confer calls to discuss discovery matters. Virgin Galactic produced 10,615 documents (approximately 69,000 pages) and hours upon hours of video and audio footage. Third parties produced another 1,735 documents (approximately 33,000 pages), which Plaintiffs reviewed. Plaintiffs also produced approximately 85,000 pages of documents.

7. Lead Counsel took eight fact depositions. These depositions were held in the New York Metro Area, California (Orange County), New Mexico (Las Cruces), Florida (Cape Canaveral), and internationally (British Virgin Islands). The deponents included three Virgin Galactic pilots, a former NASA administrator, and Richard Branson.

Class Certification

8. Plaintiffs Ortiz, Ibrahim, Brantley, and O’Keefe-Jones, and Plaintiffs’ Expert Dr. David Tabak, sat for depositions.

Settlement Discussions

9. The Parties held informal discussions concerning settlement and mediation following the Court’s decision on the 2AC. These discussions intensified in early 2025, and on March 28, 2025, the Parties held a full-day mediation assisted by Jed D. Melnick of JAMS. Prior to the mediation, the Parties exchanged, and provided to Mr. Melnick, detailed mediation statements that summarized both documents produced to date and deposition testimony. The Parties did not reach a settlement on March 28, but continued informal discussions. After subsequent negotiations, Mr. Melnick made a double-blind mediator’s recommendation to resolve the Action for \$8.5 million, which the Parties accepted.

10. The Parties negotiated an agreement in principle to settle the Action, which was memorialized in a term sheet dated July 18, 2025. The Parties subsequently negotiated the Stipulation and exhibits thereto, including the Long Notice, Summary Notice, and Postcard Notice (“Notice Documents”).

Lead Counsel’s Combined Lodestar

11. The following is a summary chart of the hours expended and lodestar amounts using current rates for the two firms;

LAW FIRM	HOURS	LODESTAR
Rosen Law (Ex. 11-A)	2,040.82	\$2,581,839.60
GPWR (Ex. 12-A)	6,710.00	\$5,850,871.00
TOTAL	8,750.82	\$8,432,710.60

Lead Counsel’s Combined Expenses

12. Lead Counsel are seeking reimbursement of a total of **\$1,223,037.21** in out-of-pocket costs and expenses. The following is a combined breakdown by category of all expenses incurred by Lead Counsel taken from each firm’s individual declaration (Exhibits 11-B and 12-B):

CATEGORY OF EXPENSE	AMOUNT PAID
CONFERENCE ROOMS FOR DEPOSITION IN BRITISH VIRGIN ISLANDS	\$4,400.00
COURIER AND SPECIAL POSTAGE	\$2,129.08
COURT FILING FEES	\$1,000.00
DOCUMENT MANAGEMENT	\$23,033.08
EXPERTS	\$912,385.56
INVESTIGATIONS	\$80,499.60
MEDIATION SERVICES	\$21,206.44
ONLINE LEGAL RESEARCH AND DOCUMENT RETRIEVAL FEES	\$56,008.45
PHOTOIMAGING	\$770.81
SERVICE OF PROCESS	\$1,237.71
TRANSCRIPTS	\$79,649.32
TRAVEL AIRFARE (GPWR)	\$9,116.61
TRAVEL AUTO (GPWR)	\$2,041.80
TRAVEL HOTELS (GPWR)	\$10,204.77
TRAVEL MEALS (GPWR)	\$1,951.64
TRAVEL PARKING (GPWR)	\$85.00
TRAVEL/AIRFARE/PARKING/MEALS/MISCELLANEOUS (ROSEN LAW)	\$13,912.53
PRESS RELEASES AND NOTICE TO CLASS MEMBERS FEES	\$3,404.81
Grand Total	\$1,223,037.21

13. Attached hereto are true and correct copies of:
- a. Exhibit 1: Excerpts of Edward Flores, Svetlana Starykh, and Ivelina Velikova, *Recent Trends in Securities Class Action Litigation, 2025 Full-Year Review* (NERA, Jan. 21, 2026);
 - b. Exhibit 2: Select Second Circuit Cases with 33⅓% or Higher Fee Awards;
 - c. Exhibit 3: Declaration of Josephine Bravata Concerning: (A) Mailing/Emailing of Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections;
 - d. Exhibit 4: Declaration of Named Plaintiff Jennifer Ortiz;

- e. Exhibit 5: Declaration of Named Plaintiff Raymond Ochs;
- f. Exhibit 6: Declaration of Named Plaintiff Hesham Ibrahim;
- g. Exhibit 7: Declaration of Named Plaintiff Montgomery Brantley;
- h. Exhibit 8: Declaration of Lead Plaintiff Robert Scheele Declaration;
- i. Exhibit 9: Declaration of Lead Plaintiff Mark Kusnier;
- j. Exhibit 10: Table of Peer Law Firm Billing Rates;
- k. Exhibit 11: Declaration of Jonathan Horne, Esq. in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses Filed on Behalf of the Rosen Law Firm, P.A.; and
- l. Exhibit 12: Declaration of Ex Kano S. Sams II, Esq. in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses Filed on Behalf of Glancy Prongay Wolke & Rotter LLP.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on May 27, 2026, in New York, New York.

/s/ Jonathan Horne

Jonathan Horne

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on May 27, 2026, in Los Angeles, California.

/s/ Ex Kano S. Sams II

Ex Kano S. Sams II

EXHIBIT 1



RECENT TRENDS IN SECURITIES CLASS ACTION LITIGATION: 2025 FULL-YEAR REVIEW

Edward Flores, Svetlana Starykh,
and Ivelina Velikova¹

Filings Down by 11% Due to Decline in
Standard Filings

AI- and Crypto-Related Filings Increase,
SPAC- and COVID-Related Filings Decline,
Tariff-Related Filings Appear

Dismissals Increase for a Second Straight
Year, Median Settlement Value at a
10-Year High

FOREWORD

I am excited to share NERA's "Recent Trends in Securities Class Action Litigation: 2025 Full-Year Review" with you. This year's edition builds on work carried out over more than three decades by many of NERA's securities and finance experts. Although space does not permit us to present all the analyses the authors have undertaken while working on this year's edition or to provide details on the statistical analysis of settlement amounts, we hope you will contact us if you want to learn more about our research or our consulting and testifying experience in securities litigations. On behalf of NERA's securities and finance experts, I thank you for taking the time to review this year's report and hope you find it informative.

DAVID TABAK, PhD

Senior Managing Director



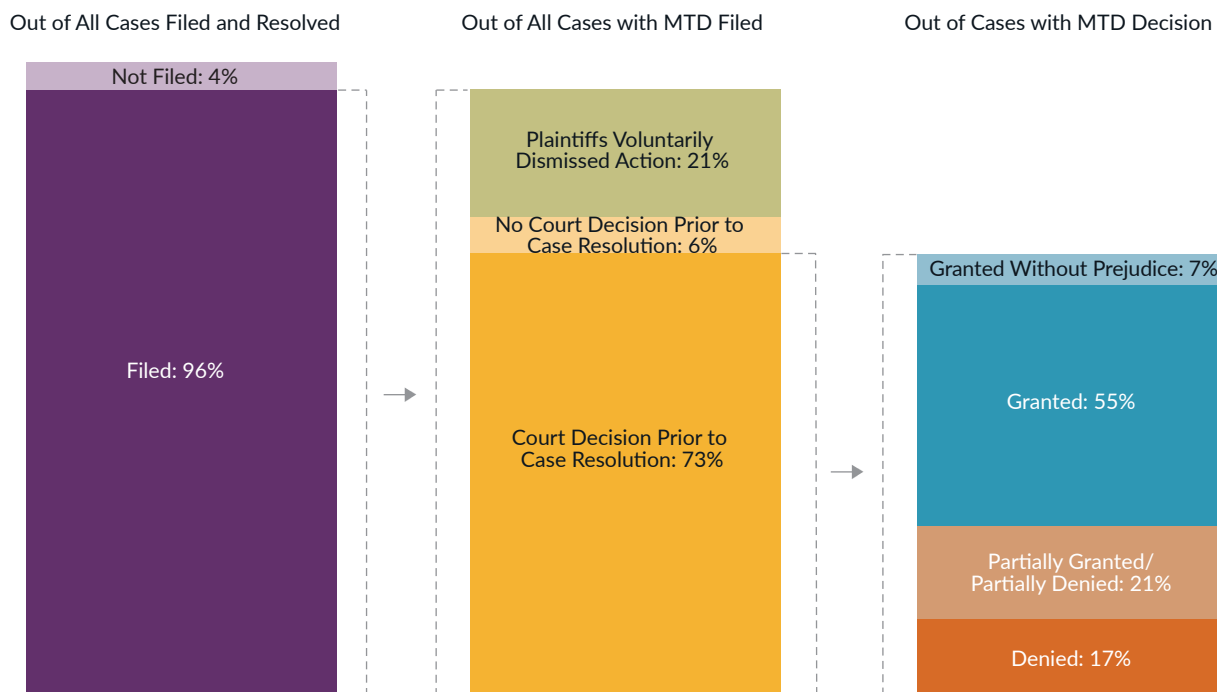
ANALYSIS OF MOTIONS

NERA’s federal securities class action database tracks filing and resolution activity as well as decisions on motions to dismiss, motions for class certification, and the status of any motion as of the resolution date. For this analysis, we include securities class actions that were filed and resolved over the 2016–2025 period in which purchasers of common stock are part of the class and which contain alleged violations of Rule 10b-5, Section 11, and/or Section 12.

Motion to Dismiss

A motion to dismiss was filed in 96% of the securities class actions suits filed and resolved in the past 10 years. For cases in which a motion to dismiss was filed, a decision was reached in 73% of cases, 6% settled before a court decision was reached, and 21% were voluntarily dismissed by plaintiffs. Among the cases in which a decision was reached, 62% of motions were granted (with or without prejudice), while 38% were denied either in part or in full. See Figure 15.

Figure 15. **Filing and Resolutions of Motions to Dismiss**
Cases Filed and Resolved January 2016–December 2025

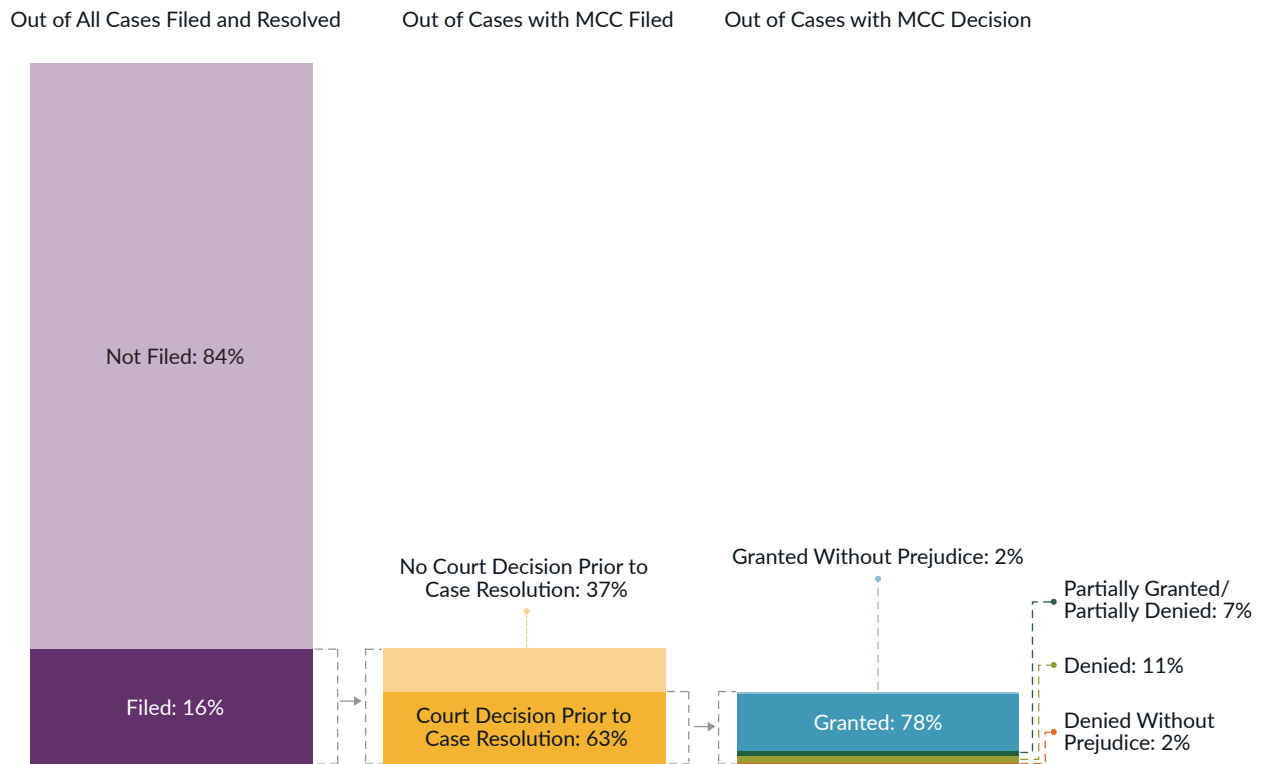


Motion for Class Certification

As most cases are either dismissed or settled before the class certification stage is reached, only 16% of securities class action suits had a motion for class certification filed. Of these, a decision was reached in 63% of cases, while almost all the remaining 37% of cases were resolved with a settlement. Among the cases in which a court decision was reached, the motion for class certification was at least partially granted (with or without prejudice) in 87% of cases and denied (with or without prejudice) in 13% of cases. See Figure 16.

For cases in which a decision was reached on the motion for class certification, 22% of decisions occurred within two years of the filing of the first complaint, 62% were reached between 2–4 years, and 16% were decided in more than four years (see Figure 17). The median time is about 2.8 years.

Figure 16. **Filing and Resolutions of Motions for Class Certification**
Cases Filed and Resolved January 2016–December 2025

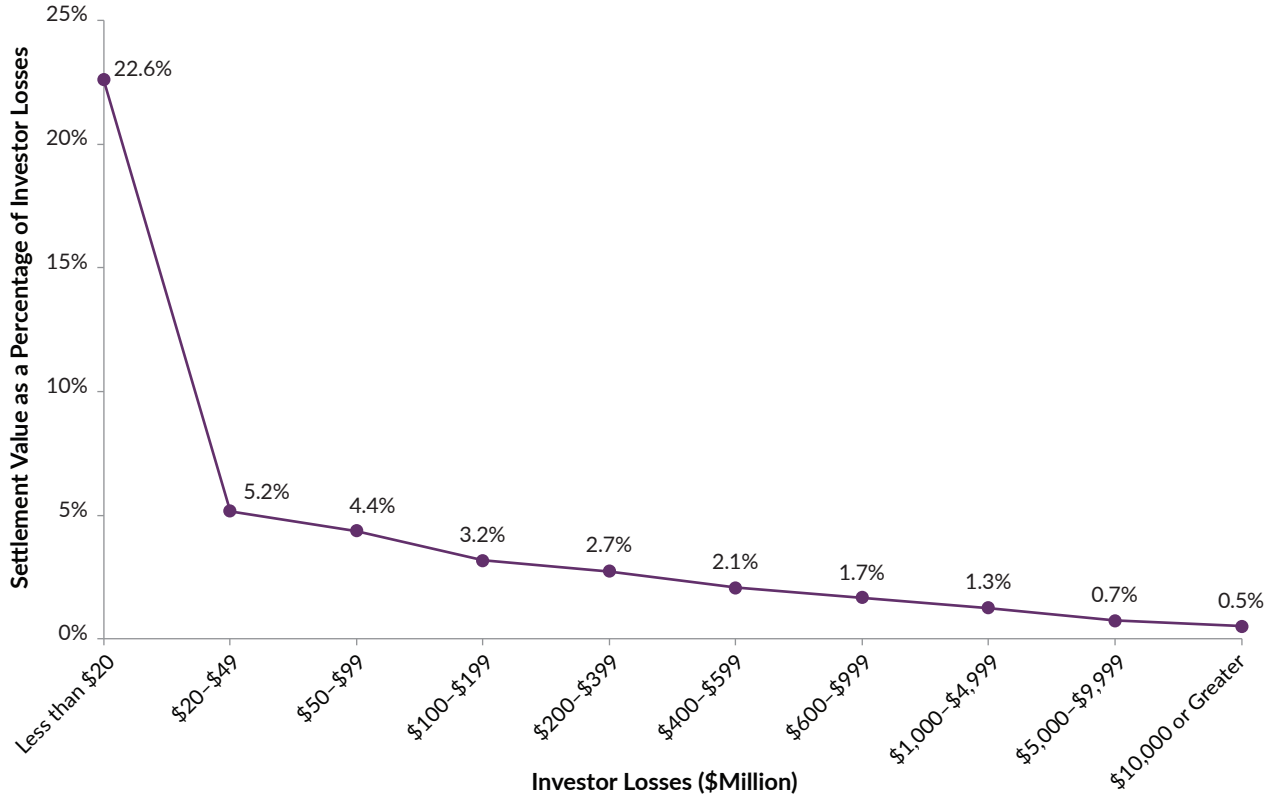


NERA-DEFINED INVESTOR LOSSES

To estimate the potential aggregate loss to investors as a result of investing in the defendant’s stock during the alleged class period, NERA has developed a proprietary variable, NERA-Defined Investor Losses, using publicly available data. The NERA-Defined Investor Loss measure is constructed assuming investors had invested in stocks during the class period whose performance was comparable to that of the S&P 500 Index. Over the years, NERA has reviewed and examined more than 2,000 settlements and found, of the variables analyzed, this proprietary variable to be the most powerful predictor of settlement amount.³⁰

A statistical review reveals that, while settlement values and NERA-Defined Investor Losses are highly correlated, the relationship is not linear. The ratio of settlement value to NERA-Defined Investor Losses is higher for cases with lower Investor Losses than for cases with higher Investor Losses. For instance, in cases with less than \$20 million in Investor Losses, the median settlement value comprises 22.6% of Investor Losses, while in cases with more than \$20 million in Investor Losses, the median settlement value is at most 5.2% of Investor Losses. See Figure 23.

Figure 23. Median Settlement Value as a Percentage of NERA-Defined Investor Losses
By Level of Investor Losses
Cases Settled January 2016–December 2025



NOTES

- 17 See Edward Flores and Svetlana Starykh, "Recent Trends in Securities Class Action Litigation: H1 2025 Update," *NERA*, 29 July 2025, Figure 8, available at <https://www.nera.com/insights/publications/2025/recent-trends-in-securities-class-action-litigation--h1-2025-upd.html>.
- 18 See Flores and Milev, 2025, Figure 3.
- 19 SPAC IPO figures taken from SPAC Data, accessed 9 January 2026, available at <https://www.spacdata.com>.
- 20 Lauren Berg, "Block Hit With Shareholder Suit Over Cash App AML Protocols," *Law360.com*, 21 January 2025, available at <https://www.law360.com/articles/2286823>.
- 21 Here "dismissed" is used as shorthand for all class actions resolved without settlement; it includes cases in which a motion to dismiss was granted (and not appealed or appealed unsuccessfully), voluntary dismissals, cases terminated by a successful motion for summary judgment, and an ultimately unsuccessful motion for class certification.
- 22 See Edward Flores and Svetlana Starykh, "Recent Trends in Securities Class Action Litigation: 2024 Full-Year Review," *NERA*, 22 January 2025, Figure 13, available at <https://www.nera.com/insights/publications/2025/recent-trends-in-securities-class-action-litigation--2024-full-y.html>.
- 23 See Edward Flores and Svetlana Starykh, "Recent Trends in Securities Class Action Litigation: H1 2025 Update," *NERA*, 29 July 2025, Figure 10, available at <https://www.nera.com/insights/publications/2025/recent-trends-in-securities-class-action-litigation--h1-2025-upd.html>.
- 24 In this analysis, only cases filed from 2000 onward are considered.
- 25 For our settlement analyses, NERA includes settlements that have had the first settlement-approval hearing. We do not include partial settlements or tentative settlements that have been announced by plaintiffs and/or defendants. As a result, although we include the 2020 Valeant Pharmaceuticals partial settlement in Table 2 due to its size, this case is not included in any of our resolution, settlement, or attorney fee statistics.
- 26 While annual average settlement values can be a helpful statistic, these values may be affected by one or a few very high settlement amounts. Unlike averages, the median settlement value is unaffected by these high outlier settlement amounts. To understand what more typical cases look like, we analyze the average and median settlement values for cases with a settlement amount under \$1 billion, thus excluding these outlier settlement amounts. For the analysis of settlement values, we limit our data to non-merger objection and non-crypto unregistered securities cases with settlements of more than \$0 to the class.
- 27 Hailey Konnath, "Alibaba Investors' Attys Awarded \$108M In IPO Settlement," *Law360.com*, 27 March 2025, available at <https://www.law360.com/articles/2316787>.
- 28 Katryna Perera, "GE Investors' \$362.5M Deal Gets Final OK, Attys Get \$70M," *Law360.com*, 24 April 2025, available at <https://www.law360.com/articles/2330130>.
- 29 Gillian R. Brassil, "EQT's \$168 Million Investor Class Accord Gets Court Go-Ahead (1)," *BloombergLaw*, 6 November 2025, available at <https://news.bloomberglaw.com/securities-law/eqts-168-million-investor-class-settlement-gets-court-go-ahead>.
- 30 NERA-Defined Investor Losses is only calculable for cases involving allegations of damages to common stock based on one or more corrective disclosures moving the stock price to its alleged true value. As a result, we have not calculated this metric for cases such as merger objections.

RELATED EXPERTS



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The opinions expressed herein do not necessarily represent the views of NERA or any other NERA consultant.

ABOUT NERA

Since 1961, NERA has provided unparalleled guidance on the most important market, legal, and regulatory questions of the day. Our work has shaped industries and policy around the world. Our field-leading experts and deep experience allow us to provide rigorous analysis, reliable expert testimony, and data-powered policy recommendations for the world's leading law firms and corporations as well as regulators and governments. Our experience, integrity, and economic ingenuity mean you can depend on us in the face of your biggest economic and financial challenges.



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EXHIBIT 2

Select Second Circuit Cases with 33% or Higher Fee Awards

Case	Settlement Amount	Fee Award
In re Initial Pub. Offering Sec. Litig., 671 F. Supp. 2d 467, 516 (S.D.N.Y. 2009)	\$586,000,000	33⅓%
In re U.S. Foodservice, Inc. Pricing Litig, No. 07-md-01894, 2014 WL 12862264, at *3 (D.Conn. Dec. 9, 2014)	\$297,000,000	33⅓%
Qsberg v. Foot Locker, Inc., No. 07-cv-1358, ECF No. 423 (S.D.N.Y. Jun. 8, 2018)	\$288,479,943	33.00%
In re Buspirone Antitrust Litig., No. 01-md-01413, 2003 U.S. Dist. LEXIS 26538 at *9 (S.D.N.Y. Nov. 21, 2003)	\$220,000,000	33⅓%
Pearlstein v. BlackBerry Limited, No. 13-cv-07060, 2022 WL 4554858, at *9-*11 (S.D.N.Y. Sep. 29, 2022)	\$165,000,000	33⅓%
Haddock v. Nationwide Life Ins. Co., No. 01-cv-01552, ECF Nos. 598-1, 601 (D. Conn. Apr. 9, 2015)	\$140,000,000	35.00%
Landmen Partners, Inc. v. The Blackstone Grp., L.P., No. 08-cv-03601, 2013 WL 11330936, at *3 (S.D.N.Y. Dec. 18, 2013)	\$85,000,000	33.33%
In re Grab Holdings Ltd. Sec. Litig., No. 1:22-cv-02189, 2025 WL 1413515 at *5 (S.D.N.Y. May 15, 2025)	\$80,000,000	33⅓%
In re J.P. Morgan Stable Value Fund ERISA Litig., No. 12-cv-02548, 2019 WL 4734396, at *6 (S.D.N.Y. Sep. 23, 2019)	\$75,000,000	33⅓%
In re Nat. Gas Commodities Litig., No. 03-cv-06186 (VM), ECF No. 445 (S.D.N.Y. May 26, 2006)	\$72,762,500	33⅓%
Nichols v. Noom, Inc., No. 20-cv-03677, 2022 WL 2705354 at *10 (S.D.N.Y. Jul. 12, 2022)	\$56,000,000	33⅓%
In re Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litig., No. 18-md-02819, 2020 WL 6193857, at *5-6 (E.D.N.Y. Oct. 7, 2020)	\$51,025,000	33⅓%
In re Chicago Bridge & Iron Co. N.V. Sec. Litig., No. 17-cv-01580, 2022 WL 3220783, at *1 (S.D.N.Y. Aug. 5, 2022)	\$44,000,000	33⅓%
In re Crazy Eddie Sec. Litig., 824 F.Supp. 320, 326 (E.D.N.Y. 1993)	\$42,000,000	33.8%
In re Medical X-Ray Film Antitrust Litig., No. 93-cv-5904, 1998 WL 661515, at *7-8 (E.D.N.Y. Aug. 7, 1998)	\$39,360,000	33⅓%
In re Marsh ERISA Litig., 265 F.R.D. 128, 149, at *9 (S.D.N.Y. 2010)	\$35,000,000	33⅓%
In re Perrigo Company PLC Sec. Litig., No. 19-cv-00070 (DLC), ECF No. 331 (S.D.N.Y. Feb. 18, 2022)	\$31,900,000	33⅓%
In re Cnova N.V. Sec. Litig., No. 16-cv-00444, ECF No. 148 (S.D.N.Y. Mar. 20, 2018)	\$28,500,000	33⅓%
In re Nat. Gas Commodities Litig., No. 03-cv-06186 (VM), ECF No. 507 (S.D.N.Y. Jun. 22, 2007)	\$28,087,500	33⅓%
In re Facebook Inc. IPO Sec. and Deriv. Litig., No. 12-md-2389, 2015 WL 6971424 at *9 (S.D.N.Y. Nov. 9, 2015)	\$26,500,000	33.00%

Case	Settlement Amount	Fee Award
Gilbert v. Azure Power Global Ltd., No. 22-cv-07432, ECF No. 134 (S.D.N.Y. Sep. 8, 2025)	\$23,000,000	33⅓%
In re Apac Teleservs., Inc. Sec. Litig., No. 97-cv-9145, ECF No. 58 (S.D.N.Y. Dec. 12, 2001)	\$21,000,000	33⅓%
In re Y-mAbs Therapeutics, Inc. Sec. Litig., No. 23-cv-00431, 2024 WL 5082773, at *4 (S.D.N.Y. Oct. 29, 2024)	\$19,650,000	33.30%
In re XL Fleet Corp. Sec. Litig., No. 21-cv-02002, 2024 WL 1884483, at *1 (S.D.N.Y. Apr. 30, 2024)	\$19,500,000	33⅓%
In re Deutsche Bank AG Sec. Litig., No. 09-cv-01714, 2020 WL 3162980 at *1 (S.D.N.Y. Jun. 11, 2020)	\$18,500,000	33⅓%
In re NYSE Specialists Sec. Litig., No. 03-cv-08264, ECF No. 403 (S.D.N.Y. Jun. 10, 2013)	\$18,500,000	41.10%
Wilson v. LSB Industries, Inc. , No. 15-cv-07614, 2019 WL 3542844 at *1 (S.D.N.Y. Jun. 28, 2019)	\$18,450,000	33⅓%
Hawaii Structural Ironworkers Pension Trust Fund v. AMC Entertainment Holdings, Inc., No. 18-cv-00299, ECF No. 230 (S.D.N.Y. Feb. 14, 2022)	\$18,000,000	33⅓%
In re Oxycontin Antitrust Litig, No. 04-md-01603, ECF No. 360 (S.D.N.Y. Jan. 25, 2011)	\$16,000,000	33⅓%
Newman v. Caribiner Int'l Inc., No. 99-cv-2271, ECF No. 31 (S.D.N.Y. Oct. 25, 2001)	\$15,000,000	33⅓%
In re Ubiquiti Networks Inc. Sec. Litig., No. 18-cv-01620, ECF No. 49 (S.D.N.Y. Mar. 27, 2020)	\$15,000,000	33⅓%
City of Providence v. Aeropostale, Inc., No. 11-cv-7132, 2014 WL 1883494, at *20 (S.D.N.Y. May 9, 2014)	\$15,000,000	33.00%
Merryman v. Citigroup, Inc., No. 15-cv-09185, ECF No. 163 (S.D.N.Y. 2019 Jul. 15, 2019)	\$14,750,000	33⅓%
Gruber v. Gilbertson, No. 16-cv-09727, 2022 WL 17828609, at *19 (S.D.N.Y. Dec. 21, 2022)	\$13,950,000	33⅓%
Nguyen v. NewLink Genetics Corp., No. 16-cv-03545, ECF No. 132 (S.D.N.Y. Sep. 22, 2021)	\$13,500,000	33⅓%
In re CarLotz, Inc. Sec. Litig., No. 21-cv-05906, ECF No. 205 (S.D.N.Y. Jul. 7, 2025)	\$13,000,000	33⅓%
Martinek v. AmTrust Financial Services, Inc., No. 19-cv-08030-KPF, ECF No. 112 (S.D.N.Y. Nov. 16, 2022)	\$13,000,000	33.33%
In re Giant Interactive Group, Inc. Sec. Litig., 279 F.R.D. 151, 166 (S.D.N.Y. 2011)	\$13,000,000	33.00%
Naclerio v. DocGo, Inc., No. 23-cv-09476, ECF No. 122 (S.D.N.Y. Mar. 24, 2026)	\$12,500,000	33.00%
In re Parking Heaters, Antitrust Litig. Direct Purchasers, No. 15-MC-0940, 2019 WL 8137325 (E.D.N.Y. Aug 15, 2019)	\$12,200,000	33⅓%
In re Jernigan Cap., Inc., No. 20-cv-09575, ECF 154 (S.D.N.Y. May 29, 2025)	\$12,000,000	33⅓%

Case	Settlement Amount	Fee Award
McIntire v. China Media Express Holdings, Inc., No. 11-cv-00804, ECF No. 263 (S.D.N.Y. Sep. 18, 2015)	\$12,000,000	33.33%
Maley, v. Del Global Technology, , No. 00-cv-08495, ECF No. 50 (S.D.N.Y. Jan. 29, 2000)	\$11,500,000	33⅓%
In re Arrival SA Sec. Litig., No. 22-cv-00172, 2026 WL 816654 at *2 (E.D.N.Y. Mar. 25, 2026)	\$11,275,000	33⅓%
Gould v. Winstar Communications, Inc., No. 01-cv-03014, ECF No. 363 (S.D.N.Y. Nov. 13, 2013)	\$10,000,000	33.33%
In re Tenaris S.A. Sec. Litig., 2024 WL 1719632, at *10, 12 (E.D.N.Y. Apr. 22, 2024)	\$9,500,000	33⅓%
Machniewicz v. Uxin Limited, No. 19-cv-00822, ECF No. 61 (E.D.N.Y. Sep. 8, 2021)	\$9,500,000	33.33%
Levin v. Resource Capital Corp., No. 15-cv-07081, ECF No. 95 (S.D.N.Y. Aug. 3, 2018)	\$9,500,000	33.00%
Khait v. Whirlpool Corp., No. 06-cv-6381, 2010 WL 2025106, at *8 (E.D.N.Y. Jan. 20, 2010)	\$9,250,000	33.00%
Ferraiori v. Triterras, Inc. , No. 20-cv-10795, ECF No. 82 (S.D.N.Y. Sept 8, 2022)	\$9,000,000	33⅓%
In re PPD AI Group Inc. Sec. Litig., No. 18-cv-06716, 2022 WL 198491 at *16 (E.D.N.Y. Jan 21, 2022)	\$9,000,000	33⅓%
Beach v. JPMorgan Chase Bank, No. 17-cv-00563, ECF No. 232 at 2 (S.D.N.Y. Oct. 7, 2020)	\$9,000,000	33.00%
In re Qudian Inc. Sec. Litig., No. 17-cv-09741, 2021 WL 2328437, at *1 (S.D.N.Y. Jun. 8, 2021)	\$8,500,000	33⅓%
Skiadas v. Acer Therapeutics Inc. , No. 19-cv-06137, ECF No. 136 (S.D.N.Y. Jan. 7, 2022)	\$8,350,000	33⅓%
In re Nano-X Sec. Litig., No. 21-cv-05517, ECF No. 93 (E.D.N.Y. May 10, 2024)	\$8,000,000	33⅓%
In re Van der Moolen Holding N.V. Sec. Litig., No. 03-cv-08284, ECF No. 45 (S.D.N.Y. Dec. 6, 2006)	\$8,000,000	33⅓%
Becher v. Long Island Lighting Co., 64 F.Supp.2d 174, 182, at *3 (E.D.N.Y. 1999)	\$7,750,000	33⅓%
In re Parking Heaters, Antitrust Litig. Indirect Purchasers, No. 15-MC-0940, 2019 WL 8137325 (E.D.N.Y. Aug 15, 2019)	\$7,700,000	33⅓%
Willix v. Healthfirst, Inc., No. 07-cv-01143, 2011 WL 754862, at *7 (E.D.N.Y. Feb. 18, 2011)	\$7,675,000	33.00%
Panther Partners Inc. v. Jianpu Technology Inc. , No. 18-cv-09848, ECF No. 130 (S.D.N.Y. May 12, 2022)	\$7,500,000	33⅓%
Lea v. TAL Education Group, No. 18-cv-05480, 2021 WL 5578665 at *11 (S.D.N.Y Nov 30, 2021)	\$7,500,000	33⅓%
Guevoura Fund Ltd. v. Sillerman, No. 15-cv-07192, 2019 WL 6889901, at *1 (S.D.N.Y. Dec. 18, 2019)	\$7,500,000	33⅓%

Case	Settlement Amount	Fee Award
Swanson v. Interface, Inc. , No. 20-cv-05518, ECF No. 91 (E.D.N.Y. Oct. 20, 2023)	\$7,500,000	33.00%
In re Reconnaissance Energy Africa Ltd. Sec. Litig., No. 21-cv-06176, 2024 WL 5265298 at *1 (E.D.N.Y. Dec. 30, 2024)	\$7,009,759	33⅓%
In re Sundial Growers Inc. Sec. Litig., No. 19-cv-08913, ECF No. 117 (S.D.N.Y. Oct. 6, 2022)	\$7,000,000	33⅓%
Zeltser v. Merrill Lynch & Co., Inc., No. 13-cv-01531, 2014 WL 4816134, at *11 (S.D.N.Y. Sep. 23, 2014)	\$6,900,000	33⅓%
In re Austin Capital Management, Ltd., Sec. & ERISA Litig., No. 09-md-02075, ECF No. 103 (S.D.N.Y. Oct. 2, 2014)	\$6,850,000	33⅓%
Fogarazzo v. Lehman Bros. Inc., No. 03-cv-5194, 2011 WL 671745, *4 (S.D.N.Y. Feb. 23, 2011)	\$6,750,000	33⅓%
Cohen v. Apache Corp., No. 89-cv-00076, 1993 U.S. Dist. LEXIS 5211, at *1 (S.D.N.Y. Apr. 21, 1993)	\$6,750,000	33⅓%
Guevoura Fund Ltd. v. Robert F.X. Sillerman, No. 15-cv-07192, 2019 WL 6889901, at *1 (S.D.N.Y. Dec. 18, 2019)	\$6,750,000	33⅓%
In re Global Brokerage, Inc. Sec. Litig., No. 17-cv-00916, ECF No. 374 (S.D.N.Y. Jul. 7, 2023)	\$6,500,000	33⅓%
In re Patriot National, Inc. Sec. Litig., No. 17-cv-01866, 2019 WL 5882171, at *1-2 (S.D.N.Y. Nov. 6, 2019)	\$6,500,000	33.00%
In re Northern Dynasty Minerals Ltd. Sec. Litig., 2024 WL 308242, at *9, 15 17 (E.D.N.Y. Jan. 26, 2024)	\$6,375,000	33⅓%
Horowitz v. Sunlands Tech. Grp., No. 19-CV-3744 (RML) ECF No. 75 (E.D.N.Y. Oct. 11, 2023)	\$6,200,000	33⅓%
Mo-Kan Iron Workers Pension Fund v. Teligent, Inc., No. 19-cv-03354, ECF No. 102 (S.D.N.Y. Dec. 1, 2021)	\$6,000,000	33⅓%
Clark v. Ecolab Inc., No. 07-cv-08623, 2010 WL 1948198, at *8-9 (S.D.N.Y. May 11, 2010)	\$6,000,000	33.00%
Piazza v. Nevsun Resources, Ltd., No. 12-cv-01845, ECF No. 55 (S.D.N.Y. Feb 13, 2015)	\$5,995,000	33⅓%
Murphy III v. JBS S.A., No. 17-cv-03084, ECF No. 57 (E.D.N.Y. Jul. 22, 2019)	\$5,866,600	33.52%
Li v. Duoyuan Global Water, Inc., No. 10-cv-07233, ECF No. 205 (S.D.N.Y. Feb. 5, 2014)	\$5,150,000	33.33%
Bensley v. Falconstor Software, Inc., No. 10-cv-04572, 2014 WL 12917621, at *10 (E.D.N.Y. Apr. 10, 2014)	\$5,000,000	33⅓%
Marchand v. Momo Inc. , No. 19-cv-04433, ECF No. 80 (S.D.N.Y. Aug. 4, 2021)	\$5,000,000	33⅓%
In re Ideanomics, Inc. Sec. Litig., No. 19-cv-06741, ECF No. 132 (S.D.N.Y. Jan. 25, 2022)	\$5,000,000	33.33%
Chin v. KE Holdings, Inc., No. 21-cv-11196, 2026 WL 555625 at *1 (S.D.N.Y. Feb. 27, 2026)	\$4,950,000	33⅓%

Case	Settlement Amount	Fee Award
Beckman v. Keybank, N.A., 293 F.R.D. 467, 482, at *6-7 (S.D.N.Y. 2013)	\$4,900,000	33⅓%
In re Akazoo S.A. Sec. Litig., No. 20-cv-01900 2021, 2021 WL 4316717, at *1 (E.D.N.Y. Sep. 10, 2021)	\$4,900,000	33⅓%
In re DDAVP Indirect Purchaser Antitrust Litig., No. 05-cv-02237, 2013 WL 10114257, at *3 (S.D.N.Y. Dec. 18, 2013)	\$4,750,000	33.00%
Kohari v. MetLife Group, Inc., No. 21-cv-06146, 2025 WL 100898, at *11 (S.D.N.Y. Jan. 15, 2025)	\$4,500,000	33⅓%
Toure v. Amerigroup Corp. , No. 10-cv-05391, 2012 WL 3240461, at *7 (E.D.N.Y. Aug. 6, 2012)	\$4,450,000	33⅓%
Perry v. Duoyuan Printing, Inc. , No. 10-cv-07235, ECF No. 185 (S.D.N.Y. Nov 27, 2013)	\$4,300,000	33⅓%
Leach v. NBC Universal Television Group , No. 15-cv-07206, ECF No. 329 (S.D.N.Y. Aug 24, 2017)	\$4,269,867	33⅓%
In re iDreamSky Technology Limited Sec. Litig., No. 15-cv-02514, 2018 WL 8950640, at *4 (S.D.N.Y. April 6, 2018)	\$4,150,000	33⅓%
In re 3D Systems Sec. Litig., No. 21-cv-01920, ECF No. 76 (Jan. 4, 2024)	\$4,000,000	33⅓%
Massiah v. Metroplus Health Plan, Inc., 2012 WL 5874655, at *6 (E.D.N.Y. Nov. 20, 2012)	\$4,000,000	33⅓%
In re Hi-Crush Partners L.P. Sec. Litig., No. 12-cv-08557, 2014 WL 7323417, at *19 (S.D.N.Y. Dec. 19, 2014)	\$3,800,000	33⅓%
Solomon v. Sprint Corp., No. 19-cv-05272, ECF No. 98 (S.D.N.Y. Aug. 14, 2023)	\$3,750,000	33⅓%
Wilchfort v. Knight , No. 17-cv-01046, ECF No. 97 (E.D.N.Y. Dec. 4, 2019)	\$3,750,000	33⅓%
Too v. Rockwell Medical, Inc., No. 18-cv-04253, 2020 WL 1026410, at *3 (E.D.N.Y. Feb. 26, 2020)	\$3,700,000	33⅓%
Gormley v. Magijack Vocaltec Ltd. , No. 16-cv-01869, ECF No. 70 (S.D.N.Y. Jan. 19, 2018)	\$3,650,000	33.00%
Gormley v. Magijack Vocaltec Ltd., No. 1:16-cv-01869-VM, ECF No. 70 (S.D.N.Y. Jan. 19, 2018)	\$3,650,000	33.00%
Schutter v. Tarena International, Inc., 2024 WL 4118465, at *12 (E.D.N.Y. Sep. 9, 2024)	\$3,500,000	33⅓%
In re L & L Energy, Inc., No. 13-cv-06704, ECF No. 86 (S.D.N.Y. Aug 3, 2015)	\$3,500,000	33⅓%
Mohney v. Shelly's Prime Steak, Stone Crab & Oyster Bar, No. 06 Civ. 4270, 2009 WL 5851465, at *5 (S.D.N.Y. Mar. 31, 2009)	\$3,265,000	33.00%
Sanders v. The CJS Solutions Grp., LLC, No. 17-cv-3809, ECF No. 106 (S.D.N.Y Jun. 22, 2018)	\$3,240,000	33⅓%
In re Loop Industries, Inc. Sec. Litig., No. 20-cv-09031, ECF No. 59 (S.D.N.Y. Jan 5, 2023)	\$3,100,000	33⅓%

Case	Settlement Amount	Fee Award
Lematta v. Casper Sleep Inc. , No. 20-cv-02744, ECF No. 102 (E.D.N.Y. Feb. 6, 2025)	\$3,000,000	33⅓%
Enriquez v. Nabriva Therapeutics plc, No. 19-cv-04183, ECF No. 78 (S.D.N.Y. May 14, 2021)	\$3,000,000	33⅓%
Stefaniak v. HSBC Bank USA, N.A., No. 05-cv-07208, 2008 WL 7630102 at *10 (W.D.N.Y. Jun. 28, 2008)	\$2,900,000	33.00%
Gauquie v. Albany Molecular Research, Inc., No. 14-cv-06637, ECF No. 72 (E.D.N.Y. Oct. 13, 2017)	\$2,868,000	33⅓%
Vaccaro v. New Source Energy Partners Lp., No. 15-cv-8954, 2017 WL 6398636, at *6 (S.D.N.Y. Dec. 14, 2017)	\$2,850,000	33⅓%
In re Blech Sec. Litig., No. 94-cv-07696, 2002 WL 31720381, at *1 (S.D.N.Y. Dec. 4, 2002)	\$2,795,000	33⅓%
Bensinger v. Denbury Resources Inc., No. 10-cv-01917, ECF No. 146 (E.D.N.Y. Jul. 20, 2015)	\$2,750,000	33⅓%
In re Namaste Technologies Inc. Sec. Litig., No. 18-cv-10830, ECF No. 76 (S.D.N.Y. Mar. 11, 2020)	\$2,750,000	33.30%
In re Akari Therapeutics PLC Sec. Litig., No. 17-cv-03577, ECF No. 106 (S.D.N.Y. Nov. 28, 2018)	\$2,700,000	33⅓%
McIntosh v. Katapult Holdings, Inc., No. 21-cv-07251, 2024 WL 5118192 at *12-*15 (S.D.N.Y. Dec. 13, 2024)	\$2,500,000	33⅓%
Mikhlin v. Oasmia Pharmaceutical AB , No. 19-cv-04349, ECF No. 45 (E.D.N.Y.)	\$2,350,000	33⅓%
In re Fuwei Films Sec. Litig., No. 07-cv-09416, ECF No. 86 (S.D.N.Y. Apr. 27, 2011)	\$2,150,000	33.00%
In re Revolution Lighting Technologies, Inc. Sec. Litig., No. 19-cv-00980, ECF No. 86 (S.D.N.Y. Aug. 11, 2020)	\$2,083,333	33.33%
Menkes v. Stolt-Nielsen S.A., No. 03-cv-00409, ECF No. 142 (D.Conn. Jan. 25, 2011)	\$2,000,000	33⅓%
Levine v. Atricure, Inc. , No. 06-cv-14324, ECF No. 85 (S.D.N.Y. May 27, 2011)	\$2,000,000	33⅓%
Kristal v. Mesoblast Limited, No. 20-cv-08430, 2022 WL 3442535, at *1 (S.D.N.Y. Aug. 15, 2022)	\$2,000,000	33⅓%
Brennan v. Latch, Inc., No. 22-cv-07473, 2025 WL 4632679 (S.D.N.Y. May 28, 2025)	\$1,950,000	33⅓%
Perry v. Duoyuan Printing, Inc., No. 10-cv-07235, ECF No. 218 (S.D.N.Y. Jun. 16, 2015)	\$1,893,750	33⅓%
Lin v. Liberty Health Sciences Inc., No. 19-cv-00161, ECF No. 100 (S.D.N.Y. Nov. 16, 2021)	\$1,800,000	33⅓%
In re Noah Education Holdings Ltd. Sec. Litig., No. 08-cv-09203, ECF No. 80 (S.D.N.Y. May 27, 2011)	\$1,750,000	33⅓%
Calfo and Demsar v. Messina, Sr., , No. 15-cv-04010, ECF No. 184 (S.D.N.Y. Oct. 30, 2017)	\$1,650,000	33.33%

Case	Settlement Amount	Fee Award
Palacio v. E*TRADE Financial Corp., 2012 WL 2384419, at *6 (S.D.N.Y. Jun. 22, 2012)	\$1,500,000	33⅓%
Strougo v. Bassini, No. 258 F.Supp.2d 254, 262, at *4-5 (S.D.N.Y. 2003)	\$1,500,000	33⅓%
In re Altair Nanotechnologies Sec. Litig., No. 14-cv-07828, ECF No. 53 (S.D.N.Y. Jun. 15, 2016)	\$1,500,000	33.00%
In re FAB Universal Corp. Sec. Litig., No. 13-cv-08216, ECF No. 74 (S.D.N.Y. Jan. 28, 2016)	\$1,500,000	33.00%
Luib v. Henkel Consumer Goods Inc., No. 1:17-cv-03021-BMC, ECF No. 60 (E.D.N.Y. Aug. 19, 2019)	\$1,500,000	33.00%
In re Akazoo S.A. Sec. Litig., No. 20-cv-01900, 2022 WL 14915812 at *4 (E.D.N.Y. Oct. 07, 2022)	\$1,470,000	33⅓%
Viti v. Shattuck Labs, Inc. , No. 22-cv-00560, ECF No. 54 (E.D.N.Y. Nov. 6, 2023)	\$1,400,000	33⅓%
Tiro v. Public House Investments, LLC, No. 11-cv-07679, ECF No. 113 (S.D.N.Y. Sep. 10, 2013)	\$1,300,000	33⅓%
Tate v. Aterian, Inc., No. 21-cv-04323, ECF No. 99 (S.D.N.Y. Sep. 12, 2022)	\$1,300,000	33.33%
Grice v. Pepsi Beverages Company , No. 17-cv-08853, ECF No. 66 (S.D.N.Y. Jan. 28, 2019)	\$1,192,275	33⅓%
Henry v. Little Mint, Inc. , No. 12-cv-03996, ECF No. 71 (S.D.N.Y. May 23, 2014)	\$1,162,500	33.33%
In re China Sunergy Company Limited, No. 07-cv-07895, ECF No. 66 (S.D.N.Y. May 12, 2011)	\$1,050,000	33.33%
Springer v. Code Rebel Corp., No. 16-cv-03492, 2018 WL 1773137, at *5 (S.D.N.Y. Apr. 10, 2018)	\$1,000,000	33.33%

EXHIBIT 3

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

**DECLARATION OF JOSEPHINE BRAVATA CONCERNING:
(A) MAILING/EMAILING OF NOTICE; (B) PUBLICATION OF THE SUMMARY
NOTICE; AND (C) REPORT ON REQUESTS FOR EXCLUSION AND OBJECTIONS**

I, Josephine Bravata, declare as follows:

1. I am the Director of Quality Assurance at Strategic Claims Services (“SCS”), a nationally recognized class action administration firm.¹ I have over twenty-five years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred and seventy-five (575) class action cases since its inception. I have personal knowledge of the facts set forth herein, and if called on to do so, I could and would testify competently thereto.

2. Pursuant to the Magistrate Judge Merkl’s Report and Recommendation, dated February 24, 2026 (ECF No. 205, the “R&R”), which Judge Morrison adopted in its entirety (Order Adopting Report and Recommendation, dated March 11, 2026; collectively, with the R&R, the “Preliminary Approval Order”), SCS was appointed to act as the Claims Administrator in connection with the Settlement of the above-captioned action (the “Action”). I submit this declaration in order to provide the Court and the Parties with information regarding the notice program, as well as updates concerning other aspects of the Settlement administration process.

MAILING OR EMAILING NOTICE

3. Pursuant to the Preliminary Approval Order, SCS printed the Postcard Notice to mail to potential members of the Settlement Class. A true and correct copy of the Postcard Notice is attached as **Exhibit A**.

4. On March 12, 2026, SCS received from Lead Counsel the lists containing the names and addresses of record holders for the purchasers of Virgin Galactic and/or Social Capital common stock during the Settlement Class Period (“Record Holder List”). SCS mailed, by first

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated November 3, 2025 (ECF No. 198-1, the “Stipulation”).

class mail, postage prepaid, the Postcard Notice to 937 individuals and organizations identified on the Record Holder List. The Record Holder List mailing was completed on April 10, 2026.

5. Additionally, as in most securities class actions, the large majority of potential Settlement Class Members are expected to be beneficial purchasers/owners whose securities are held in “street name” — *i.e.*, the securities are purchased/owned by brokerage firms, banks, institutions and other third-party nominees in the name of the nominee, on behalf of the beneficial purchasers/owners. The names and addresses of these beneficial purchasers/owners are known only to the nominees. SCS maintains a proprietary master list consisting of 1,068 banks and brokerage companies, as well as 1,530 mutual funds, insurance companies, pension funds, and money managers. On April 9, 2026, SCS caused a letter to be mailed or e-mailed to the 2,598 nominees on SCS’s master mailing list. The letter directed those entities that purchased or otherwise acquired Virgin Galactic Securities from July 10, 2019, through August 4, 2022, both dates inclusive, for the beneficial interest of persons or organizations other than themselves, that they must, within 7 calendar days from receipt of the letter, either: (a) request from SCS sufficient copies of the Postcard Notice to forward to all such beneficial purchasers/owners and within seven (7) calendar days of receipt of those Postcard Notices forward them to all such beneficial purchasers/owners; (b) request from SCS a link to the Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (“Notice”) and Proof of Claim and Release Form (“Claim Form”); and together with the Notice, “Notice Packet”) and, within seven (7) calendar days of receipt of the link, email the link to all such beneficial owners for whom valid email addresses are available; or (c) provide a list of the names, mailing addresses and email addresses (to the extent available) of all such beneficial

purchasers/owners to SCS, in which event SCS would promptly mail the Postcard Notice or email a link to the Notice Packet, to such beneficial purchasers/owners. To the extent a nominee chose to follow procedures (a) or (b), SCS requested that, upon such mailing or emailing, the nominee send a statement to SCS confirming that the mailing or emailing was made as directed. Nominees were also notified that the Postcard Notices were only to be printed by the Claims Administrator. A copy of the letter sent to these nominees is attached as **Exhibit B**, and a copy of the Notice Packet is attached as **Exhibit C**.

6. Following these mailings, SCS received 68,481 additional names and addresses of potential Settlement Class Members from individuals or nominees requesting that a Postcard Notice be mailed by SCS, and a nominee notified SCS that they mailed 119 Postcard Notices themselves to their customers. SCS also received a request from a nominee for 302,560 Postcard Notices so that the nominee could forward them to their customers.

7. To date, 372,097 Postcard Notices have been mailed to potential Settlement Class Members and nominees.

8. Additionally, SCS sent the link to the Notice Packet to 1,075,560 valid email addresses received from nominees, and SCS was notified by one of the nominees that they emailed 775,094 of their customers to notify them of this Settlement and provide the link to the Notice Packet. To date, 1,850,654 potential Settlement Class Members have been notified of the Settlement by email notice only.

9. In total, 2,222,751 potential Settlement Class Members were notified either by mailed Postcard Notice or emailed the link to the Notice Packet.

10. SCS sent the Depository Trust Company (“DTC”) the Notice and Claim Form for the DTC to publish on its Legal Notice System (“LENS”) on April 9, 2026. LENS provides DTC

participants the ability to search and download legal notices as well as receive email alerts based on particular notices or particular CUSIPs once a legal notice is posted.

PUBLICATION OF THE SUMMARY NOTICE

11. Pursuant to the R&R, the Summary Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses ("Summary Notice") was published once in the *Investor's Business Daily* and transmitted once over the *PR Newswire* on April 27, 2026, as shown in the confirmations of publication attached hereto as **Exhibit D**.

TOLL-FREE PHONE LINE

12. SCS maintains a toll-free telephone number (1-866-274-4004) for potential Settlement Class Members to call and obtain information about the Settlement. Settlement Class Members may also request a Notice and Claim Form. SCS has promptly responded to each telephone inquiry and will continue to address Settlement Class Member inquiries.

SETTLEMENT WEBSITE

13. On April 8, 2026, SCS established a website at www.VirginGalacticSecuritiesSettlement.com ("Settlement Website"). The Settlement Website is accessible 24 hours a day, 7 days a week. The Settlement Website contains (a) a Homepage with general information regarding the Settlement, and a chart setting forth important dates (*i.e.*, claims filing deadline, objection and exclusion deadlines, and Settlement Hearing date); (b) an Important Documents page with downloadable copies of the Notice and Claim Form, Postcard Notice, R&R, Stipulation with exhibits, and Plaintiffs' Fourth Amended Complaint; (c) a File a Claim Online page; (d) a Representative Filers page; and (e) a Contact Us page.

14. Importantly, and as indicated in the above, the Settlement Website allows potential Settlement Class Members to file claims online and provides instructions and a claims-filing template for institutional investors who file large numbers of claims.

15. To date, the Settlement Website has received 131,059 pageviews from 44,982 unique users.

16. The Settlement Website will continue to be updated with relevant case information and Court documents.

REPORT ON EXCLUSIONS AND OBJECTIONS

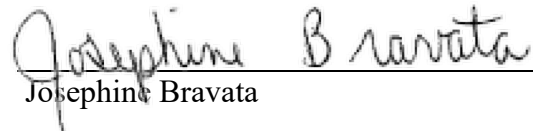
17. The Postcard Notice, Notice, Summary Notice, and Settlement Website informed potential Settlement Class Members of the June 18, 2026 deadline for requesting exclusion. The Notice also set forth the information that must be included in each request for exclusion. SCS has monitored all mail delivered for this case. To date, SCS has received seven requests for exclusion. Five of the exclusion requests did not provide the information required by the Court-approved Notice (ECF No. 203, Ex. 1 at ¶55), including, among other things, information concerning the number of shares purchased, acquired and sold during the Settlement Class Period; therefore, SCS emailed them the instructions on how to file an exclusion request. To date, SCS has not received a response. Copies of the two exclusion requests with number of shares are attached as **Exhibit E**. **Exhibit F** consists of the incomplete exclusion requests with SCS's responses. SCS will submit a supplemental declaration after the June 18, 2026, deadline addressing any additional requests for exclusion and if SCS received a response to the five exclusion requests.

18. The Postcard Notice, Notice, Summary Notice, and Settlement Website further informed Settlement Class Members that the objection deadline is June 9, 2026. The Notice also provides that written objections must be submitted to the Clerk of the Court as well as mailed to

Lead Counsel and Defendants' Counsel such that they are received on or before the deadline. Despite these instructions, Settlement Class Members sometimes send objections to the Claims Administrator. As of the date of this declaration, SCS has received one objection. **Exhibit G** is a copy of the objection. SCS has been informed by Lead Counsel that the author of that objection has since filed a modified version of the objection with the Court. *See* ECF No. 211.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 22nd day of May 2026, in Media, Pennsylvania.



Josephine Bravata

Virgin Galactic Securities Litigation
c/o Strategic Claims Services
600 N. Jackson St., Ste 205
Media, PA 19063

COURT-ORDERED LEGAL NOTICE

**Important Notice about a Securities
Class Action Settlement.**

**You may be entitled to a CASH
payment. This Notice may affect your
legal rights. Please read it carefully.**

*Lavin v. Virgin Galactic Holdings, Inc., et
al.*, Case No. 1:21-cv-03070-ARR-TAM
(E.D.N.Y.)

EXHIBIT A

***THIS CARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE CLASS ACTION SETTLEMENT.
PLEASE VISIT www.VirginGalacticSecuritiesSettlement.com FOR MORE INFORMATION.***

The United States District Court for the Eastern District of New York (“Court”) has preliminarily approved a proposed Settlement of claims against Virgin Galactic Holdings, Inc. (“Virgin Galactic”) and certain executives and directors of Virgin Galactic (“Defendants”). The Settlement would resolve a lawsuit in which Plaintiffs allege that Defendants violated the federal securities laws. Defendants deny any wrongdoing. You received this Postcard Notice because you or someone in your family may have purchased or otherwise acquired the publicly traded shares of Virgin Galactic and/or Social Capital Hedosophia Holdings Corp. common stock, from July 10, 2019, through August 4, 2022, both dates inclusive.

The Settlement dismisses and releases all claims against Defendants and creates a fund consisting of \$8,500,000, plus interest earned thereon and less attorneys’ fees and other expenses, which will be divided among Settlement Class Members who timely submit valid Proof of Claim and Release Forms (“Claim Form”). **For all details of the Settlement, read the Stipulation and full Notice, available at www.VirginGalacticSecuritiesSettlement.com. The Notice will contain information related to, among other things, the allocation of the settlement fund, and the average recovery per affected Virgin Galactic Security.**

To qualify for payment, you must submit a Claim Form. The Claim Form can be found on the website www.VirginGalacticSecuritiesSettlement.com or will be mailed to you upon request to the Claims Administrator (866) 274-4004. **Claim Forms must be postmarked or submitted online to the Claims Administrator by August 13, 2026.** If you do not want to be legally bound by the Settlement, you must exclude yourself by June 18, 2026. If you exclude yourself, you cannot get money from this Settlement. If you want to object to the Settlement, you may file an objection by June 9, 2026. The detailed Notice explains how to submit a Claim Form, exclude yourself, or object.

The Court will hold a hearing in this case on July 9, 2026, to consider whether to approve the Settlement and a request by the lawyers representing the Settlement Class for up to 33 1/3% of the Settlement Fund in attorneys’ fees, plus Litigation Expenses in an amount not to exceed \$1.55 million, which will include a request for an aggregate award of \$55,000 to plaintiffs (\$10,000 each to four plaintiffs, and \$7,500 each to two plaintiffs) pursuant to 15 U.S.C. §78u-4(a)(4) in connection with their representation of the Settlement Class. In addition to the Litigation Expenses, Lead Counsel will seek payment of all Notice and Administration Costs, which are estimated to be \$985,000. You may attend the hearing and ask to be heard by the Court, but you do not have to. For more information, call toll-free (866) 274-4004 or visit the website www.VirginGalacticSecuritiesSettlement.com and read the detailed Notice.

REQUEST FOR NAMES, EMAILS, AND ADDRESSES OF SETTLEMENT CLASS MEMBERS

STRATEGIC CLAIMS SERVICES
600 N. JACKSON STREET, SUITE 205
MEDIA, PA 19063

PHONE: (610) 565-9202 EMAIL: info@strategicclaims.net FAX: (610) 565-7985

April 9, 2026

This letter is being sent to all entities whose names have been made available to us, or which we believe may know of potential Settlement Class Members.

We request that you assist us in identifying any individuals/entities who fit the following description:

ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED THE PUBLICLY TRADED SHARES OF VIRGIN GALACTIC HOLDINGS, INC. (“VIRGIN GALACTIC”) AND/OR SOCIAL CAPITAL HEDOSOPHIA HOLDINGS CORP. (“SOCIAL CAPITAL”) COMMON STOCK FROM JULY 10, 2019, THROUGH AUGUST 4, 2022, BOTH DATES INCLUSIVE (“SETTLEMENT CLASS PERIOD”).

Excluded from the Settlement Class are: (a) persons and entities that suffered no compensable losses; and (b)(i) Defendants; (ii) any person who served as an officer or director of Virgin Galactic, Social Capital, and/or subsidiaries of either during the Settlement Class Period, and their Immediate Family; (iii) persons or entities who held shares of Vieco 10 Ltd. as of October 25, 2019, and all subsidiaries thereof; (iv) any trust of which an Individual Defendant was or is the settlor or which was or is for the benefit of an Individual Defendant and/or member(s) of their immediate families; (v) Defendants’ liability insurance carriers; (vi) Virgin Group Holdings Limited and each of its controlled subsidiaries and affiliates; (vii) the legal representatives, heirs, successors, predecessors, and assigns of any person or entity excluded under provisions (i) through (vi) hereof; and (viii) all entities controlled by the persons and entities excluded under provisions (i) through (vii) hereof.

The information below may assist you in finding the above requested information:

<p><i>Virgin Galactic Securities Litigation</i> Case No.: 1:21-cv-03070-ARR-TAM Objection Deadline: June 9, 2026 Notice To Appear Deadline: June 9, 2026 Exclusion Deadline: June 18, 2026 Settlement Hearing: July 9, 2026 Claim Filing Deadline: August 13, 2026</p>	<p>Security Identifiers:</p> <p>Social Capital Hedosophia Holdings Corp.:</p> <ul style="list-style-type: none"> • CUSIP: G8250R103 • ISIN: KYG8250R1039 • Ticker Symbol: NYSE: IPOA <p>Virgin Galactic Holdings, Inc.:</p> <ul style="list-style-type: none"> • CUSIPs: 92766K106 and 92766K403 • ISINs: US92766K1060 and US92766K4031 • SEDOLs: BKWBFH2 and BSNTQK1 • Ticker Symbols: NYSE: SPCE
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PER COURT ORDER, PLEASE RESPOND WITHIN 7 CALENDAR DAYS FROM THE DATE OF THIS NOTICE.

Please comply in one of the following ways:

1. If you have no beneficial purchasers/owners, please advise us in writing; or
2. **Supply us with names, last known addresses, and email addresses (to the extent available)** of your beneficial purchasers/owners and we will do the emailing of the link to the Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses and the Proof of Claim and Release Form (“Notice and Claim Form”) or mailing of the Postcard Notice. Please provide us this information electronically; or
3. Advise us of how many beneficial purchasers/owners you have, and we will supply you with ample postcards to do the mailing. After the receipt of the Postcard Notices, you have seven (7) calendar days to mail them; or
4. Request the link to the Notice and Claim Form and email the link to each of your beneficial purchasers/owners within seven (7) calendar days after receipt thereof.¹

You can bill us for any reasonable expenses actually incurred and **not to exceed:**

- **\$0.01 per link to the Notice and Claim Form emailed, OR**
- **\$0.01 per name, address and email address (to the extent available)** if you are providing us the records, OR
- **\$0.01 per name and address, including materials, plus postage at the pre-sort rate used by the Claims Administrator** if you are requesting the Postcard Notices and performing the mailing.

Please use the following direct link to the Notice and Claim Form for emails: <https://virgingalacticsecuritiessettlement.com/wp-content/uploads/sites/17/2026/04/Virgin-Galactic-Long-Notice-and-Claim-Form-v4.pdf>.

All invoices must be received within 30 days of this letter.

You are on record as having been notified of the legal matter. A copy of the Notice and Claim Form and other important case-related documents are available on our website at www.VirginGalacticSecuritiesSettlement.com. You can also request a copy via email at info@strategicclaims.net.

Thank you for your prompt response.

Regards,
Claims Administrator
Virgin Galactic Securities Litigation

¹ YOU ARE NOT AUTHORIZED TO PRINT THE POSTCARD NOTICE YOURSELF. POSTCARD NOTICES MAY ONLY BE PRINTED BY THE COURT-APPOINTED CLAIMS ADMINISTRATOR.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

**NOTICE OF (I) PENDENCY OF CLASS ACTION, CERTIFICATION OF SETTLEMENT CLASS,
AND PROPOSED SETTLEMENT; (II) SETTLEMENT FAIRNESS HEARING; AND (III) MOTION
FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION
EXPENSES**

A federal court authorized this Notice. This is not attorney advertising.

If you purchased or otherwise acquired the publicly traded shares of Virgin Galactic Holdings, Inc. (“Virgin Galactic”)¹ and/or Social Capital Hedosophia Holdings Corp. (“Social Capital”) common stock from July 10, 2019, through August 4, 2022, both dates inclusive (the “Settlement Class Period”), you could get a payment from a class action settlement (“Settlement”).²

PLEASE READ THIS NOTICE CAREFULLY. This Notice explains important rights you may have, including the possible receipt of cash from the Settlement. If you are a member of the Settlement Class, your legal rights will be affected whether or not you act.

If you have any questions about this Notice, the proposed Settlement, or your eligibility to participate in the Settlement, please DO NOT contact Virgin Galactic, any other Defendants in the Action, their counsel, or the Court. All questions should be directed to Lead Counsel or the Claims Administrator (see page 3 below).

1. **Statement of the Settlement Class’s Recovery:** Subject to court approval, Plaintiffs, on behalf of themselves and the Settlement Class, have agreed to settle the Action in exchange for a payment of \$8,500,000 in cash (the “Settlement Amount”) to be deposited into an escrow account. The Net Settlement Fund (*i.e.*, the Settlement Amount plus any and all interest earned thereon (the “Settlement Fund”) less: (a) any Taxes, (b) any Notice and Administration Costs, (c) any Litigation Expenses awarded by the Court, and (d) any attorneys’ fees awarded by the Court) will be distributed to the members of the Settlement Class in accordance with a plan of allocation that is approved by the Court. The proposed plan of allocation (the “Plan of Allocation”) is set forth on pages 7-12 below.

2. **Estimate of Average Amount of Recovery Per Virgin Galactic Security:** The settlement represents

¹ All capitalized terms used in this Notice that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated November 3, 2025 (the “Stipulation”), which is available at www.VirginGalacticSecuritiesSettlement.com.

² “Virgin Galactic Securities” means, collectively, the publicly traded shares of Virgin Galactic and Social Capital common stock.

an estimated average recovery of: (a) \$0.075 per damaged share for shares purchased or acquired between July 12, 2021 through September 2, 2021, inclusive (“Active Claims”), and (b) \$0.0012 per damaged share for shares purchased or acquired between the periods: (i) from July 10, 2019 through July 11, 2021, inclusive; and (ii) from September 3, 2021 through August 4, 2022, inclusive (“Dismissed Claims”). See paragraphs 32-33 below for more information on Active and Dismissed Claims. Some Settlement Class Members may recover more or less than this estimated amount depending on, among other factors, which Virgin Galactic Securities they purchased, when and at what prices they purchased/acquired or sold their Virgin Galactic Securities, and the total number of valid Proof of Claim and Release Forms (“Claim Forms”) submitted. Distributions to Settlement Class Members will be made based on the Plan of Allocation set forth herein (see pages 7-12 below) or such other plan of allocation as may be ordered by the Court.

3. **Average Amount of Damages Per Virgin Galactic Security:** The Parties do not agree on the average amount of damages per Virgin Galactic Security that would be recoverable if Plaintiffs were to prevail in the Action. Among other things, Defendants do not agree with the assertion that they violated the federal securities laws or that any damages were suffered by any members of the Settlement Class as a result of their conduct.

4. **Attorneys’ Fees and Expenses Sought:** Plaintiffs’ Counsel, which have been prosecuting the Action on a wholly contingent basis since July of 2021, have not received any payment of attorneys’ fees for their representation of the Settlement Class and have advanced the funds to pay expenses necessarily incurred to prosecute this Action. Court-appointed Lead Counsel, Glancy Prongay Wolke & Rotter LLP (f/n/a Glancy Prongay & Murray LLP) (“GPM”) and The Rosen Law Firm, P.A. (“Rosen Law”), will apply to the Court for an award of attorneys’ fees for all Plaintiffs’ Counsel in an amount not to exceed 33¹/₃% of the Settlement Fund. In addition, Lead Counsel will apply for reimbursement of Litigation Expenses paid or incurred in connection with the institution, prosecution, and resolution of the claims against the Defendants, in an amount not to exceed \$1.55 million, which will include a request for an aggregate award of \$55,000 to plaintiffs (\$10,000 each to four plaintiffs, and \$7,500 each to two plaintiffs) pursuant to 15 U.S.C. §78u-4(a)(4) in connection with their representation of the Settlement Class. In addition to the Litigation Expenses, Lead Counsel will also seek payment of all Notice and Administration Costs, which are estimated to be approximately \$985,000. Any fees and expenses awarded by the Court will be paid from the Settlement Fund. Settlement Class Members are not personally liable for any such fees or expenses. Estimates of the average cost per affected Virgin Galactic Security, if the Court approves Lead Counsel’s fee and expense application (not including Notice and Administration Costs), is \$0.0387 per eligible security for the Active Claims, and \$0.0006 per eligible security for the Dismissed Claims.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT:	
SUBMIT A CLAIM FORM ONLINE OR POSTMARKED BY AUGUST 13, 2026.	This is the only way to get a payment from the Settlement Fund.
EXCLUDE YOURSELF FROM THE SETTLEMENT BY JUNE 18, 2026.	If you exclude yourself from the Settlement Class, you will not receive any payment from the Settlement Fund. This is the only option that allows you ever to be part of any other lawsuit against any of the Defendants or the other Released Defendants’ Parties concerning the Released Plaintiffs’ Claims.
OBJECT TO THE SETTLEMENT IN WRITING SO THAT IT IS RECEIVED NO LATER THAN JUNE 9, 2026.	If you do not like the proposed Settlement, the proposed Plan of Allocation, or the request for attorneys’ fees and reimbursement of Litigation Expenses, you may write to the Court and explain why you do not like them. You cannot object to the Settlement, the Plan of Allocation, or the fee and expense request unless you are a Settlement Class Member and do not exclude yourself from the Settlement Class.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT:	
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement no later than June 9, 2026 , at the hearing on July 9, 2026 . You can still submit a Claim Form. If the Court approves the Settlement, you will be bound by it. You do not have to attend the hearing to be eligible for a payment.
DO NOTHING.	Get no payment AND give up your right to bring your own individual action relating to the claims asserted in the Action.

INQUIRIES

Please do not contact the Court regarding this Notice. All inquiries concerning this Notice, the Claim Form, or the Settlement should be directed to:

<p style="text-align: center;"><i>Virgin Galactic Securities Litigation</i> c/o Strategic Claims Services P.O. Box 230 600 N. Jackson St., Ste. 205 Media, PA 19063 Telephone: (866) 274-4004 Email: info@strategicclaims.net www.VirginGalacticSecuritiesSettlement.com</p>	and/or	<p style="text-align: center;">THE ROSEN LAW FIRM, P.A. Jonathan Horne, Esq. 275 Madison Avenue, 40th Floor New York, NY 10016 Telephone: (212) 686-1060 Email: info@rosenlegal.com</p> <p style="text-align: center;">or</p> <p style="text-align: center;">GLANCY PRONGAY WOLKE & ROTTER LLP Ex Kano S. Sams II, Esq. 1925 Century Park East, Suite 2100 Los Angeles, CA 90067 Telephone: (310) 201-9150 Email: settlements@glancylaw.com</p>
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WHY DID I GET THE POSTCARD NOTICE OR THIS NOTICE?

5. The Court directed that the Postcard Notice be mailed to you because you or someone in your family or an investment account for which you serve as a custodian may have purchased or otherwise acquired one or more of the Virgin Galactic Securities during the Settlement Class Period. The Court also directed that this Notice be posted online at www.VirginGalacticSecuritiesSettlement.com and mailed to you upon request to the Claims Administrator. The Court has directed us to disseminate these notices because, as a potential Settlement Class Member, you have a right to know about your options before the Court rules on the proposed Settlement. Additionally, you have the right to understand how this class action lawsuit may generally affect your legal rights. If the Court approves the Settlement and the Plan of Allocation (or some other plan of allocation), the Claims Administrator will make payments pursuant to the Settlement after any objections and appeals are resolved.

6. The purpose of this Notice is to inform you of the existence of this case, that it is a class action, how you might be affected, and how to exclude yourself from the Settlement Class if you wish to do so.

7. The issuance of this Notice is not an expression of any opinion by the Court concerning the merits of any claim in the Action, and the Court still has to decide whether to approve the Settlement. If the Court approves the Settlement and a plan of allocation, then payments to Authorized Claimants will be made after any appeals are resolved and after the completion of all claims processing. Please be patient, as this process can take some time to complete.

WHAT IS THIS CASE ABOUT?

8. This litigation stems from alleged violations of the federal securities laws. The alleged violations arise out of various statements Defendants made about Virgin Galactic's commercial spaceflight program, which Plaintiffs alleged were false and/or misleading. For the Action's full procedural history, please see the Stipulation.

**HOW DO I KNOW IF I AM AFFECTED BY THE SETTLEMENT?
WHO IS INCLUDED IN THE SETTLEMENT CLASS?**

9. If you are a member of the Settlement Class, you are subject to the Settlement unless you timely request to be excluded. The Settlement Class consists of:

all persons and entities who or which purchased or otherwise acquired the publicly traded shares of Virgin Galactic and/or Social Capital common stock from July 10, 2019, through August 4, 2022, inclusive (the "Settlement Class Period").

Excluded from the Settlement Class are: (a) persons and entities that suffered no compensable losses; and (b)(i) Defendants; (ii) any person who served as an officer or director of Virgin Galactic, Social Capital, and/or subsidiaries of either during the Settlement Class Period, and their Immediate Family; (iii) persons or entities who held shares of Vieco 10 Ltd. as of October 25, 2019, and all subsidiaries thereof; (iv) any trust of which an Individual Defendant was or is the settlor or which was or is for the benefit of an Individual Defendant and/or member(s) of their immediate families; (v) Defendants' liability insurance carriers; (vi) Virgin Group Holdings Limited and each of its controlled subsidiaries and affiliates; (vii) the legal representatives, heirs, successors, predecessors, and assigns of any person or entity excluded under provisions (i) through (vi) hereof; and (viii) all entities controlled by the persons and entities excluded under provisions (i) through (vii) hereof. Also excluded from the Settlement Class are any persons or entities who or which exclude themselves by submitting a request for exclusion in accordance with the requirements set forth in this Notice. *See* "What If I Do Not Want To Be A Member Of The Settlement Class? How Do I Exclude Myself," on page 12 below.

PLEASE NOTE: RECEIPT OF THE POSTCARD NOTICE OR THIS NOTICE DOES NOT MEAN

THAT YOU ARE A SETTLEMENT CLASS MEMBER OR THAT YOU WILL BE ENTITLED TO RECEIVE PROCEEDS FROM THE SETTLEMENT.

WHAT ARE PLAINTIFFS' REASONS FOR THE SETTLEMENT?

10. Plaintiffs and Lead Counsel believe that the claims asserted against Defendants have merit. They recognize, however, many offsetting factors, such as the expense and length of the continued litigation necessary to pursue their claims against the Defendants through trial and appeals, as well as the very substantial risks they would face in establishing liability and damages. For instance, among other things, Defendants argued that they did not make false statements, that even if they did the statements were not made with a wrongful state of mind, and that the alleged fraud did not cause Plaintiffs' losses. A ruling or verdict in Defendants' favor on any of their arguments could have significantly reduced, or altogether eliminated, Defendants' potential liability in the Action.

11. In light of these risks and other considerations, the amount of the Settlement and the immediacy of recovery to the Settlement Class, Plaintiffs and Lead Counsel believe that the proposed Settlement is fair, reasonable, and adequate, and in the best interests of the Settlement Class. Plaintiffs and Lead Counsel believe that the Settlement provides a substantial benefit to the Settlement Class, namely \$8,500,000 in cash (less the various deductions described in this Notice), as compared to the risk that the claims in the Action would produce a smaller or no recovery after summary judgment, trial, and appeals, possibly years in the future.

12. Defendants have denied the claims asserted against them in the Action and deny having engaged in any wrongdoing or violation of law of any kind whatsoever. Defendants state that they have agreed to the Settlement solely to eliminate the burden and expense of continued litigation.

WHAT MIGHT HAPPEN IF THERE WERE NO SETTLEMENT?

13. If there were no Settlement and Plaintiffs failed to establish any essential legal or factual element of their claims against Defendants, neither Plaintiffs nor the other members of the Settlement Class would recover anything from Defendants. Also, if Defendants were successful in proving any of their defenses, either at summary judgment, at trial, or on appeal, the Settlement Class could recover substantially less than the amount provided in the Settlement, or nothing at all.

HOW ARE SETTLEMENT CLASS MEMBERS AFFECTED BY THE ACTION AND THE SETTLEMENT?

14. As a Settlement Class Member, you are represented by Plaintiffs and Lead Counsel, unless you choose to represent yourself or enter an appearance through counsel of your own choice at your own expense. You are not required to retain your own counsel, but if you choose to do so, such counsel must file a notice of appearance on your behalf and must serve copies of their appearance on the attorneys listed in the section entitled, "When And Where Will The Court Decide Whether To Approve The Settlement?" on page 13 below.

15. If you are a Settlement Class Member and do not wish to remain a Settlement Class Member, you may exclude yourself from the Settlement Class by following the instructions in the section entitled, "What If I Do Not Want To Be A Member Of The Settlement Class? How Do I Exclude Myself?," on page 12 below.

16. If you are a Settlement Class Member and you wish to object to the Settlement, the Plan of Allocation, or Lead Counsel's application for attorneys' fees and reimbursement of Litigation Expenses, and if you do not exclude yourself from the Settlement Class, you may present your objections by following the instructions in the section entitled, "When And Where Will The Court Decide Whether To Approve The Settlement?," below.

17. If you are a Settlement Class Member and you do not exclude yourself from the Settlement Class, you will be bound by any orders issued by the Court. If the Settlement is approved, the Court will enter a judgment

(the “Judgment”). The Judgment will dismiss with prejudice the claims against Defendants and will provide that, upon the Effective Date of the Settlement, Plaintiffs and each of the other Settlement Class Members, on behalf of themselves, and on behalf of any other person or entity legally entitled to bring Released Plaintiffs’ Claims on behalf of the respective Settlement Class Member in such capacity only, shall be deemed to have, and by operation of law and of the judgment shall have, fully, finally and forever compromised, settled, released, resolved, relinquished, waived and discharged each and every Released Plaintiffs’ Claim against the Defendants and the other Released Defendants’ Parties, and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiffs’ Claims against any of the Released Defendants’ Parties.

18. The Judgment will also provide that, upon the Effective Date of the Settlement, Defendants, on behalf of themselves, and on behalf of any other person or entity legally entitled to bring Released Defendants’ Claims on behalf of Defendants in such capacity only, shall be deemed to have, and by operation of law and of the judgment shall have, fully, finally and forever compromised, settled, released, resolved, relinquished, waived and discharged each and every Released Defendants’ Claim against Plaintiffs and the other Released Plaintiffs’ Parties, and shall forever be barred and enjoined from prosecuting any or all of the Released Defendants’ Claims against any of the Released Plaintiffs’ Parties.

HOW DO I PARTICIPATE IN THE SETTLEMENT? WHAT DO I NEED TO DO?

19. To qualify for a payment, you should fill out a form online at www.VirginGalacticSecuritiesSettlement.com (“Settlement Website”). Read the instructions carefully, fill out the form, and sign it in the location indicated. The Settlement Website will allow you to upload a spreadsheet with your transaction data so that you do not have to manually enter each transaction separately.

20. If you are unable to fill out a form online, please print the form entitled “Proof of Claim and Release,” which is available on the Settlement Website, fill it out, and mail it to:

Virgin Galactic Securities Litigation
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson St., Ste. 205
Media, PA 19063

21. Please note that if you choose to print and mail a form, you will need to manually enter each transaction, and include adequate supporting documentation. If you cannot print the Claim Form, you may request that a Claim Form be mailed to you by calling the Claims Administrator toll free at 1-866-274-4004 or by emailing the Claims Administrator at info@strategicclaims.net.

22. Typically, most class members submit electronic claims. Submitting a claim by mail significantly increases the time necessary to process the claim, which both delays payments to all Settlement Class Members and reduces the amount of money that can be distributed to Settlement Class Members. Accordingly, if you choose to submit a claim by mail, your Recognized Loss will be reduced by the greater of \$5 or 1%.

23. Please retain all records of your ownership of and transactions in Virgin Galactic Securities, as they may be needed to document your Claim. If you request exclusion from the Settlement Class or do not submit a timely and valid Claim Form, you will not be eligible to share in the Net Settlement Fund.

HOW MUCH WILL MY PAYMENT BE?

24. At this time, it is not possible to make any determination as to how much any individual Settlement Class Member may receive from the Settlement. Your share of the Net Settlement Fund will depend on: (i) the number of claims filed by all Settlement Class Members; (ii) the dates you purchased and sold Virgin

Galactic Securities; (iii) the prices of your purchases and sales; (iv) the amount of administrative costs, including the costs of notice; and (v) the amount awarded by the Court to for attorneys' fees and Litigation Expenses.

25. The Net Settlement Fund will be distributed to Settlement Class Members who submit a Claim Form and whose claims for recovery are allowed by the Claims Administrator pursuant to the terms of the Stipulation or by order of the Court under the below Plan of Allocation, which reflects Plaintiffs' contention that because of the alleged misrepresentations made by Defendants, the price of Virgin Galactic Securities was artificially inflated during the Settlement Class Period, and that certain subsequent disclosures caused reductions in the inflated price of Virgin Galactic Securities. Defendants have denied and continue to deny these allegations and any and all allegations of wrongdoing, fault, liability or damage whatsoever asserted in the Action. The Net Settlement Fund will not be distributed unless and until the Court has approved the Settlement and a plan of allocation, and the time for any petition for rehearing, appeal, or review, whether by certiorari or otherwise, has expired.

26. Participants in and beneficiaries of a plan covered by ERISA ("ERISA Plan") should NOT include any information relating to their transactions in Virgin Galactic Securities held through the ERISA Plan in any Claim Form that they submit. They should include ONLY those securities that they themselves purchased or acquired outside of the ERISA Plan. ERISA Plan administrators are responsible for and may file a claim on behalf of an ERISA Plan; plan participants may not separately file a claim for the same securities. Virgin Galactic and Social Capital's employee retirement and/or benefit plan(s) are excluded from the Settlement Class.

27. The Court has reserved jurisdiction to allow, disallow, or adjust on equitable grounds the Claim of any Settlement Class Member.

PROPOSED PLAN OF ALLOCATION

28. The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund among Settlement Class Members who submit valid Claim Forms in accordance with the proposed Plan of Allocation or such other plan of allocation as the Court may approve ("Authorized Claimants") based on their respective alleged economic losses as a result of the alleged misstatements and omissions, as opposed to losses caused by market- or industry-wide factors, or company-specific factors unrelated to the alleged fraud. The Claims Administrator shall determine each Authorized Claimant's share of the Net Settlement Fund based upon the recognized loss formulas described below ("Recognized Loss").

29. A Recognized Loss will be calculated for each Virgin Galactic Security purchased or otherwise acquired during the Settlement Class Period.³ The Recognized Loss is not intended to estimate the amount a Settlement Class Member might have been able to recover after a trial, nor to estimate the amount that will be paid to Authorized Claimants pursuant to the Settlement. The Recognized Loss is the basis upon which the Net Settlement Fund will be proportionately allocated to the Authorized Claimants. The Claims Administrator will use its best efforts to administer and distribute the Net Settlement Fund equitably to the extent that it is economically feasible.

³ Prior to the reverse merger between Virgin Galactic and Social Capital, Social Capital's common stock, units, and warrants were listed on the New York Stock Exchange (the "NYSE") under the symbols IPOA, IPOA/U, and IPOA/WS, respectively. Following the closing of the merger on October 25, 2019, the Company's common stock, units, and warrants were listed on the NYSE under the symbols SPCE, SPCE/U, and SPCE/W, respectively. Social Capital and Virgin Galactic units and warrants are not eligible for a recovery in the Settlement.

After the Settlement Class Period, on June 17, 2024, Virgin Galactic completed a 1-for-20 reverse stock split of its common stock. For purposes of the Plan of Allocation, all prices and share quantities for Virgin Galactic Securities are presented on a pre-split basis (*i.e.*, not adjusted for the reverse split).

30. The Plan of Allocation was created with the assistance of a consulting damages expert and reflects the assumption that the prices of Virgin Galactic Securities were artificially inflated throughout the Settlement Class Period. The estimated alleged artificial inflation in the prices of the Virgin Galactic Securities during the Settlement Class Period is reflected in Tables 1 and 2 below. The computation of the estimated alleged artificial inflation in the prices of Virgin Galactic Securities during the Settlement Class Period are based on certain misrepresentations alleged by Plaintiffs and the price changes in the securities, net of market- and industry-wide factors, in reaction to the public announcements that allegedly corrected the misrepresentations alleged by Plaintiffs.

31. The U.S. securities laws allow investors to seek to recover losses caused by disclosures that correct the defendants’ previous misleading statements or omissions. In this Action, Plaintiffs allege that corrective disclosures removed the artificial inflation in the prices of Virgin Galactic Securities on the following dates: August 4, 2020; December 14, 2020; February 2, 2021; February 26, 2021; September 2, 2021; September 3, 2021; October 15, 2021; January 13, 2022; and August 5, 2022 (the “Corrective Disclosure Dates”). For a Settlement Class Member to have a Recognized Loss under the Plan of Allocation, Virgin Galactic Securities must have been purchased or acquired during the Settlement Class Period and held through at least one of the Corrective Disclosure Dates.

32. **Actionable and Dismissed Claims: The Recognized Loss calculations also take into account the Court’s ruling on Defendants’ motion to dismiss. Pursuant to that ruling, the only remaining actionable claims pertain to: (i) the July 2021 flight; and (ii) insider trading claims against Branson.** Accordingly, “Active Claims” are purchases and acquisitions made during the period from July 12, 2021 through September 2, 2021, inclusive. “Dismissed Claims” are purchases and acquisitions made during: (i) the period from July 10, 2019 through July 11, 2021, inclusive; and (ii) the period from September 3, 2021 through August 4, 2022, inclusive.

33. The Settlement will be divided as follows: 11.8% of the Net Settlement Fund to the Dismissed Claims (“Dismissed Claims Settlement Amount”); 88.2% of the Net Settlement Fund to the Active Claims (“Active Claims Settlement Amount”). The Dismissed Claims Settlement Amount will be divided between holders of Dismissed Claims, while the Active Claims Settlement Amount will be divided between holders of Active Claims.

34. The estimated alleged artificial inflation in the price of Virgin Galactic Securities for Active Claims is reflected in Table 1 below.

Table 1		
Artificial Inflation in Virgin Galactic Securities for Active Claims (Purchases 7/12/2021–9/2/2021)		
From	To	Per-Share Price Inflation
July 12, 2021	September 1, 2021	\$2.78
September 2, 2021	September 2, 2021	\$1.67 ⁴
September 3, 2021	Thereafter	\$0.00

35. The estimated alleged artificial inflation in the price of Virgin Galactic Securities for Dismissed Claims is reflected in Table 2 below.

⁴ Transactions in Virgin Galactic Securities on September 2, 2021, executed at a price *at or above* \$26.70 per share will be deemed to have occurred *before* the alleged corrective disclosure that day and with a per-share price inflation of \$2.78. Transactions in Virgin Galactic Securities on September 2, 2021, executed at a price *below* \$26.70 per share will be deemed to have occurred *after* the alleged corrective disclosure that day and with a per-share price inflation of \$1.67.

Table 2		
Artificial Inflation in Virgin Galactic Securities for Dismissed Claims		
(Purchases 7/10/2019–7/11/2021 and 9/3/2021–8/4/2022)		
From	To	Per-Share Price Inflation
July 10, 2019	August 3, 2020	\$28.70
August 4, 2020	December 13, 2020	\$25.09
December 14, 2020	February 1, 2021	\$19.74
February 2, 2021	February 25, 2021	\$12.82
February 26, 2021	October 14, 2021	\$8.17
October 15, 2021	January 12, 2022	\$3.79
January 13, 2022	August 4, 2022	\$1.46
August 5, 2022	Thereafter	\$0.00

* For each day during the Settlement Class Period, price inflation in Virgin Galactic Securities on the date of purchase shall be limited to that day’s closing price for the stock.

36. **Insider Trading Eligible Claims:** For purposes of this Plan of Allocation, any purchase of Virgin Galactic Securities during the period from August 10, 2021 through August 19, 2021, inclusive, will be deemed eligible for treatment as an “Insider Trading Claim.” The Recognized Loss for such securities shall be *the greater of*: (i) the “Recognized Loss Per Virgin Galactic Security”; or (ii) the “Recognized Loss Per Virgin Galactic Security on Insider Trading Claims.”

37. A Recognized Loss will be calculated as set forth below for each purchase or acquisition of Virgin Galactic Securities during the Settlement Class Period that are listed in the Claim Form and for which adequate documentation is provided.

38. In the calculations below, all purchase and sale prices shall exclude any fees, taxes and commissions. Any transactions in Virgin Galactic Securities executed outside of regular trading hours for the U.S. financial markets shall be deemed to have occurred during the next regular trading session.

Recognized Loss Per Virgin Galactic Security

39. Based on the formula set forth below, a Recognized Loss shall be calculated for each purchase or acquisition of Virgin Galactic Securities during the Settlement Class Period.

For each share that was purchased and sold during the Settlement Class Period, the Recognized Loss is *the lesser of*:

- a. the price inflation on the date of purchase *minus* the price inflation on the date of sale as provided in Tables 1 and 2 above; or
- b. the purchase price *minus* the sale price.

For each share that was purchased but not sold during the Settlement Class Period, the Recognized Loss is *the lesser of*:

- a. the price inflation on the date of purchase, as provided in Tables 1 and 2 above; or
- b. the purchase price *minus* \$6.76 (*i.e.*, the closing price of the stock on the last Corrective Disclosure Date).

Recognized Loss Per Virgin Galactic Security on Insider Trading Claims

40. Based on the formula set forth below, a Recognized Loss on Insider Trading Claims shall be calculated for each purchase or acquisition of Virgin Galactic Securities during the period from August 10, 2021 through August 19, 2021, inclusive.

For each share that was purchased during the period from August 10, 2021 through August 19, 2021, inclusive, the Recognized Loss shall be \$46,967,439 divided by the total number of shares eligible for an Insider Trading Claim.⁵

ADDITIONAL PROVISIONS

41. **FIFO Matching:** If a Settlement Class Member made more than one purchase/acquisition or sale of any Virgin Galactic Security during the Settlement Class Period, all purchases/acquisitions and sales of the like security shall be matched on a First In, First Out (“FIFO”) basis. Settlement Class Period sales will be matched first against any holdings at the beginning of the Settlement Class Period, and then against purchases/acquisitions in chronological order, beginning with the earliest purchase/acquisition made during the Settlement Class Period.

42. **“Purchase/Sale” Dates:** Purchases or acquisitions and sales of Virgin Galactic Securities shall be deemed to have occurred on the “contract” or “trade” date as opposed to the “settlement” or “payment” date. The receipt or grant by gift, inheritance, or operation of law of Virgin Galactic Securities during the Settlement Class Period shall not be deemed a purchase, acquisition, or sale of these Virgin Galactic Securities for the calculation of a Claimant’s Recognized Loss, nor shall such receipt or grant be deemed an assignment of any claim relating to the purchase/acquisition of such Virgin Galactic Securities unless: (i) the donor or decedent purchased or otherwise acquired such Virgin Galactic Securities during the Settlement Class Period; (ii) the instrument of gift or assignment specifically provides that it is intended to transfer such rights; and (iii) no Claim Form was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to such Virgin Galactic Securities.

43. **Virgin Galactic Securities Acquired Through the Exercise, Conversion, or Exchange of Non-Publicly Traded Securities:** Notwithstanding any of the above, shares of Virgin Galactic and/or Social Capital common stock acquired through the exercise, conversion, or exchange of non-publicly traded securities of Virgin Galactic and/or Social Capital are not eligible to participate in the Settlement.

44. **Automatic Conversion of Social Capital Stock:** Shares of Social Capital common stock (ticker symbol: IPOA) that automatically converted into Virgin Galactic common stock (ticker symbol: SPCE) upon the consummation of the reverse merger between Virgin Galactic and Social Capital shall be treated as a purchase of Virgin Galactic common stock at a purchase price of \$10 per share for purposes of calculations made in accordance with the Plan of Allocation.

45. **Short Sales:** The date of covering a “short sale” is deemed to be the date of purchase or acquisition of the Virgin Galactic Security. The date of a “short sale” is deemed to be the date of sale of the Virgin Galactic Security. Under the Plan of Allocation, however, the Recognized Loss on “short sales” is zero.

46. **Common Stock Purchased/Sold Through the Exercise of Publicly Traded Options:** Option contracts are not securities eligible to participate in the Settlement. With respect to Virgin Galactic Securities purchased or sold through the exercise of a publicly traded option, the purchase/sale date of the stock is the exercise date of the option and the purchase/sale price of the stock is the exercise price of the option.

47. **Common Stock Acquired Through Exercised Publicly Traded Warrants:** With respect to Virgin Galactic or Social Capital common stock purchased through the exercise of a publicly traded Virgin Galactic or Social Capital warrant, the purchase date of the stock shall be the exercise date of the warrant, and the purchase price of the stock shall be \$11.50 per share (*i.e.*, the exercise price).

48. **Separated Units:** Publicly traded Virgin Galactic and/or Social Capital units purchased during the Settlement Class Period that were subsequently separated into their component securities (*i.e.*, one share of common stock and one-third of a warrant) shall be treated solely as a purchase of the common stock received upon separation. For purposes of the Plan of Allocation, the purchase price of such stock shall be deemed to

⁵ \$46,967,439 represents the amount alleged by Plaintiffs to be the loss avoided in the transactions that are the subject of the alleged violation.

equal the closing price of Virgin Galactic or Social Capital common stock, as applicable, on the date of separation.⁶

49. **Market Gains and Losses:** With respect to all Virgin Galactic Securities purchased or acquired during the Settlement Class Period, the Claims Administrator will determine if the Claimant had a Market Gain or a Market Loss with respect to his, her, or its overall transactions in those securities during the Settlement Class Period. For purposes of making this calculation, with respect to Virgin Galactic Securities, the Claims Administrator shall determine the difference between: (i) the Claimant's Total Purchase Amount⁷ and (ii) the sum of the Claimant's Total Sales Proceeds⁸ and the Claimant's Total Holding Value.⁹ For Virgin Galactic Securities, if the Claimant's Total Purchase Amount *minus* the sum of the Claimant's Total Sales Proceeds and Total Holding Value is a positive number, that number will be the Claimant's Market Loss; if the number is a negative number or zero, that number will be the Claimant's Market Gain.

50. If a Claimant had a Market Gain with respect to his, her, or its overall transactions in Virgin Galactic Securities during the Settlement Class Period, the Claimant's total recovery will be zero. If a Claimant suffered an overall Market Loss with respect to his, her, or its overall transactions in Virgin Galactic Securities during the Settlement Class Period but that Market Loss was less than the sum of the Claimant's Recognized Loss amounts calculated above, then the Claimant's total Recognized Loss amount will be limited to the amount of the Market Loss.

51. After the initial distribution of the Net Settlement Fund, the Claims Administrator shall make reasonable and diligent efforts to have Authorized Claimants cash their distribution checks. To the extent any monies remain in the fund nine (9) months after the initial distribution, if Lead Counsel, in consultation with the Claims Administrator, determines that it is cost-effective to do so, the Claims Administrator shall conduct a re-distribution of the funds remaining after payment of any unpaid fees and expenses incurred in administering the Settlement, including for such re-distribution, to Authorized Claimants who have cashed their initial distributions and who would receive at least \$10.00 from such re-distribution. Additional re-distributions to Authorized Claimants who have cashed their prior checks and who would receive at least \$10.00 in such additional re-distributions may occur thereafter if Lead Counsel, in consultation with the Claims Administrator, determines that additional re-distributions, after the deduction of any additional fees and expenses incurred in administering the Settlement, including for such re-distributions, and Taxes, would be cost-effective. At such time as it is determined that the re-distribution of funds remaining in the Net Settlement Fund is not cost-effective, the remaining balance shall be contributed to the Public Justice Foundation, or such other non-sectarian, not-for-profit organization(s) approved by the Court.

52. The Plan of Allocation set forth herein was formulated by Plaintiffs after consultation with their damages expert. The Court may approve this plan as proposed or it may modify the Plan of Allocation without further notice to the Settlement Class. No Defendant, nor any other Released Defendants' Party, had any

⁶ Units purchased prior to the Settlement Class Period that were subsequently separated into their component securities during the Settlement Class Period are not eligible to participate in the Settlement.

⁷ The "Total Purchase Amount" is the total amount the Claimant paid (excluding all fees, taxes, and commissions) for all such Virgin Galactic Securities purchased or acquired during the Settlement Class Period.

⁸ The Claims Administrator shall match any sales of Virgin Galactic Securities during the Settlement Class Period first against the Claimant's opening position in the like securities (the proceeds of those sales will not be considered for purposes of calculating market gains or losses). The total amount received for sales of the remaining like securities sold during the Settlement Class Period is the "Total Sales Proceeds."

⁹ For each Virgin Galactic Security purchased or acquired during the Settlement Class Period that was still held as of the close of trading on August 4, 2022, the Claims Administrator shall ascribe a "Holding Value" of \$6.76 (*i.e.*, the closing price of the stock on the last Corrective Disclosure Date). The total Holding Value for all Virgin Galactic Securities that a Claimant purchased during the Settlement Class Period and still held as of the close of trading on August 4, 2022, shall be the Claimant's "Total Holding Value."

involvement with, or liability, obligation, or responsibility whatsoever for the application of the Court-approved plan of allocation. Any Orders regarding any modification of the Plan of Allocation will be posted on the Settlement Website, www.VirginGalacticSecuritiesSettlement.com.

53. Payment pursuant to the Plan of Allocation, or such other plan of allocation as may be approved by the Court, shall be conclusive against all Authorized Claimants, and there shall be no appeal to any court, including the U.S. Court of Appeals for the Second Circuit. No person shall have any claim against Plaintiffs, Lead Counsel, Plaintiffs' Counsel, Plaintiffs' damages expert, Defendants, Defendants' Counsel, or any of the other Released Plaintiffs' Parties or Released Defendants' Parties, or the Claims Administrator or other agent designated by Lead Counsel arising from distributions made substantially in accordance with the Stipulation, the plan of allocation approved by the Court, or further Orders of the Court.

**WHAT PAYMENT ARE THE ATTORNEYS FOR THE SETTLEMENT CLASS SEEKING?
HOW WILL THE LAWYERS BE PAID?**

54. Plaintiffs' Counsel have not received any payment for their services in pursuing claims against the Defendants on behalf of the Settlement Class, nor have Plaintiffs' Counsel been reimbursed for their out-of-pocket expenses. Before final approval of the Settlement, Lead Counsel will apply to the Court for an award of attorneys' fees for all Plaintiffs' Counsel in an amount not to exceed 33¹/₃% of the Settlement Fund. At the same time, Lead Counsel also intends to apply for reimbursement of Litigation Expenses in an amount not to exceed \$1.55 million, which will include a request for an aggregate award of \$55,000 to plaintiffs (\$10,000 each to four plaintiffs, and \$7,500 each to two plaintiffs) pursuant to 15 U.S.C. §78u-4(a)(4) in connection with their representation of the Settlement Class. In addition to the Litigation Expenses, Lead Counsel will seek payment of all Notice and Administration Costs, which are estimated to be approximately \$985,000.¹⁰ The Court will determine the amount of any award of attorneys' fees or reimbursement of Litigation Expenses. Any sums approved by the Court will be paid from the Settlement Fund. Settlement Class Members are not personally liable for any such fees or expenses.

**WHAT IF I DO NOT WANT TO BE A MEMBER OF THE SETTLEMENT CLASS?
HOW DO I EXCLUDE MYSELF?**

55. Each Settlement Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written Request for Exclusion from the Settlement Class, addressed to *Virgin Galactic Securities Litigation*, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063. The exclusion request must be *received* no later than June 18, 2026. You will not be able to exclude yourself from the Settlement Class after that date. Each Request for Exclusion must: (i) state the name, address, email address (if any), and telephone number of the person or entity requesting exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity "requests exclusion from the Settlement Class in *Lavin v. Virgin Galactic Holdings, Inc.*, Case No. 1:21-cv-03070-ARR-TAM"; and (iii) be signed by the person or entity requesting exclusion or an authorized representative. In addition, to be valid, a request for exclusion must include documentary proof of the number and type of Virgin Galactic Securities that the person or entity requesting exclusion purchased, acquired, and sold during the Settlement Class Period, as well as the dates and prices of each such purchase/acquisition and sale. A Request for

¹⁰ The attorney fee application will be made collectively on behalf of: GPM, 1925 Century Park East, Suite 2100, Los Angeles, CA 90067; Rosen Law, 275 Madison Avenue, 40th Floor, New York, NY 10016; and The Law Offices of Frank R. Cruz, 1999 Avenue of the Stars, Suite 1100, Los Angeles, CA 90067 ("Cruz"). Any attorneys' fees awarded by the Court will be divided between Lead Counsel: GPM (60%) and Rosen Law (40%) pursuant to a fee sharing agreement. In addition, GPM intends to share a portion of its net attorneys' fees with Cruz.

Exclusion shall not be valid and effective unless it provides all the information called for in this paragraph and is received within the time stated above, or is otherwise accepted by the Court.

56. If you do not want to be part of the Settlement Class, you must follow these instructions for exclusion even if you have pending, or later file, another lawsuit, arbitration, or other proceeding relating to any Released Plaintiffs' Claim against any of the Released Defendants' Parties.

57. If you ask to be excluded from the Settlement Class, you will not be eligible to receive any payment out of the Net Settlement Fund.

WHEN AND WHERE WILL THE COURT DECIDE WHETHER TO APPROVE THE SETTLEMENT? DO I HAVE TO COME TO THE HEARING? MAY I SPEAK AT THE HEARING IF I DON'T LIKE THE SETTLEMENT?

58. Settlement Class Members do not need to attend the Settlement Hearing. The Court will consider any submission made in accordance with the provisions below even if a Settlement Class Member does not attend the hearing. You can participate in the Settlement without attending the Settlement Hearing.

59. The Settlement Hearing will be held on July 9, 2026 at 10:00 a.m., before the Honorable Taryn A. Merkl in Courtroom 13D South of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201. The Court reserves the right to approve the Settlement, the Plan of Allocation, Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses and/or any other matter related to the Settlement at or after the Settlement Hearing without further notice to the members of the Settlement Class.

60. Any Settlement Class Member who or which does not request exclusion may object to the Settlement, the proposed Plan of Allocation or Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses. Objections must be in writing. You must file any written objection, together with copies of all other papers and briefs supporting the objection, with the Clerk's Office at the United States District Court for the Eastern District of New York at the address set forth below on or before June 9, 2026. You must also serve the papers on Lead Counsel and on Defendants' Counsel at the addresses set forth below so that the papers are *received on or before June 9, 2026*.

<u>Clerk's Office</u>	<u>Lead Counsel</u>	<u>Defendants' Counsel</u>
United States District Court Eastern District of New York Clerk of the Court United States Courthouse 225 Cadman Plaza East Brooklyn, NY 11201	Glancy Prongay Wolke & Rotter LLP Ex Kano S. Sams II, 1925 Century Park East Suite 2100 Los Angeles, CA 90067	Latham & Watkins LLP Corey A. Calabrese, 1271 Avenue of the Americas New York, NY 10020

61. Any objection must: (a) state the name, address, and telephone number of the person or entity objecting and must be signed by the objector; (b) contain a statement of the Settlement Class Member's objection or objections, and the specific reasons for each objection, including any legal and evidentiary support the Settlement Class Member wishes to bring to the Court's attention; and (c) include documents sufficient to prove membership in the Settlement Class, including the number and type of Virgin Galactic Securities that the person or entity objecting purchased, acquired, and sold during the Settlement Class Period, as well as the dates and prices of each such purchase/acquisition and sale. You may not object to the Settlement, the Plan of Allocation or Lead Counsel's motion for attorneys' fees and reimbursement of Litigation Expenses if you exclude yourself from the Settlement Class or if you are not a member of the Settlement Class.

62. You may file a written objection without having to appear at the Settlement Hearing. You may not, however, appear at the Settlement Hearing to present your objection unless you first file and serve a written

objection in accordance with the procedures described above, unless the Court orders otherwise.

63. If you wish to be heard orally at the hearing in opposition to the approval of the Settlement, the Plan of Allocation or Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses, and if you timely file and serve a written objection as described above, you must also file a notice of appearance with the Clerk's Office and serve it on Lead Counsel and Defendants' Counsel at the addresses set forth above so that it is **received on or before June 9, 2026**. You must include in your written objection or notice of appearance the identity of any witnesses they may call to testify and exhibits they intend to introduce into evidence at the hearing. You may be heard orally at the discretion of the Court.

64. You are not required to hire an attorney to represent you in making written objections or in appearing at the Settlement Hearing. However, if you decide to hire an attorney, it will be at your own expense, and that attorney must file a notice of appearance with the Court and serve it on Lead Counsel and Defendants' Counsel at the addresses set forth in ¶ 60 above so that the notice is **received on or June 9, 2026**.

65. The Settlement Hearing may be adjourned by the Court without further written notice to the Settlement Class. If you intend to attend the Settlement Hearing, you should confirm the date and time with Lead Counsel.

66. Unless the Court orders otherwise, any Settlement Class Member who does not object in the manner described above will be deemed to have waived any objection and shall be forever foreclosed from making any objection to the proposed Settlement, the proposed Plan of Allocation or Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses. Settlement Class Members do not need to appear at the Settlement Hearing or take any other action to indicate their approval.

WHAT IF I BOUGHT SHARES ON SOMEONE ELSE'S BEHALF?

67. If you purchased or otherwise acquired Virgin Galactic Securities from July 10, 2019, through August 4, 2022, both dates inclusive, for the beneficial interest of persons or organizations other than yourself, you must, within seven (7) calendar days of receipt of the Claims Administrator's notice of the Settlement, either: (a) request from the Claims Administrator sufficient copies of the Postcard Notice to forward to all such beneficial owners and, within seven (7) calendar days of receipt of those Postcard Notices, forward them to all such beneficial owners; (b) request a link to the Notice and Claim Form and, within seven (7) calendar days of receipt of the link, email the link to all such beneficial owners for whom valid email addresses are available; or (c) provide a list of the names, mailing addresses, and email addresses (to the extent available) of all such beneficial owners to *Virgin Galactic Securities Litigation*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063. If you choose option (c), the Claims Administrator will send a copy of the Postcard Notice, or email a link to the Notice and Claim Form, to the beneficial owners. Nominees that choose to follow procedures (a) or (b) shall also send a statement to the Claims Administrator confirming that the mailing or emailing was made as directed.

68. Upon full and timely compliance with these directions, nominees may seek reimbursement of their reasonable expenses actually incurred, not to exceed: (a) \$0.01 per name, mailing address, and email address (to the extent available) provided to Claims Administrator; (b) \$0.01 per email for emailing notice; or (c) \$0.01 per postcard, plus postage at the pre-sort rate used by the Claims Administrator, for mailing the Postcard Notice, by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought. **YOU ARE NOT AUTHORIZED TO PRINT THE POSTCARD NOTICE YOURSELF. POSTCARD NOTICES MAY ONLY BE PRINTED BY THE COURT-APPOINTED CLAIMS ADMINISTRATOR.** Any dispute concerning the reasonableness of reimbursement costs shall be resolved by the Court.

CAN I SEE THE COURT FILE? WHOM SHOULD I CONTACT IF I HAVE QUESTIONS?

69. This Notice contains only a summary of the terms of the proposed Settlement. For more detailed information about the matters involved in this Action, you are referred to the papers on file in the Action, including the Stipulation, which may be inspected during regular office hours at the Office of the Clerk, United States District Court for the Eastern District of New York, United States Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201. Additionally, copies of the Stipulation and other important documents are posted at www.VirginGalacticSecuritiesSettlement.com.

DO NOT CALL OR WRITE THE COURT, THE OFFICE OF THE CLERK OF THE COURT, DEFENDANTS, OR THEIR COUNSEL REGARDING THIS NOTICE.

Dated: March 11, 2026

By Order of the Court
United States District Court for the
Eastern District of New York

Virgin Galactic Securities Litigation
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson St., Ste. 205
Media, PA 19063
Toll Free Number: (866) 274-4004
Settlement Website: www.VirginGalacticSecuritiesSettlement.com
Email: info@strategicclaims.net

PROOF OF CLAIM AND RELEASE FORM

To be eligible to receive a share of the Net Settlement Fund in connection with the Settlement of this Action, you must be a Settlement Class Member and complete and sign this Proof of Claim and Release Form (“Claim Form”) and mail it by first-class mail to the above address, **so that it is postmarked no later than August 13, 2026**. In the alternative, you can complete and submit the electronic version of this Claim Form by 11:59 p.m. EST on **August 13, 2026** at www.VirginGalacticSecuritiesSettlement.com.

Failure to submit your Claim Form by the date specified will subject your claim to rejection and may preclude you from being eligible to recover any money in connection with the Settlement.

Do not mail or deliver your Claim Form to the Court, the settling parties or their counsel. Submit your Claim Form only to the Claims Administrator either online or at the address set forth above.

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PART I – CLAIMANT INFORMATION

(Please read General Instructions below before completing this page.)

The Claims Administrator will use this information for all communications regarding this Claim Form. If this information changes, you MUST notify the Claims Administrator in writing at the address above.

Beneficial Owner’s Name

Co-Beneficial Owner’s Name

Entity Name (if Beneficial Owner is not an individual)

Representative or Custodian Name (if different from Beneficial Owner(s) listed above)

Address Line 1 (street name and number)

Address Line 2 (apartment, unit or box number)

City

State

Zip Code

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Foreign Country (only if not USA)

Last four digits of Social Security Number or Taxpayer Identification Number

Telephone Number (home)

Telephone Number (work)

<input type="text"/>	<input type="text"/>
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Email address (Email address is not required, but if you provide it, you authorize the Claims Administrator to use it in providing you with information relevant to this claim.):

Account Number (account(s) through which the securities were traded)¹:

Claimant Account Type (check appropriate box):

- Individual (includes joint owner accounts)
- Corporation
- IRA/401K
- Pension Plan
- Estate
- Other _____ (please specify)
- Trust

¹ If the account number is unknown, you may leave blank. If the same legal entity traded through more than one account, you may write “multiple.” Please see paragraph 11 of the General Instructions for more information on when to file separate Claim Forms for multiple accounts, *i.e.*, when you are filing on behalf of distinct legal entities.

PART II – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (the “Notice”), which is available at www.VirginGalacticSecuritiesSettlement.com. The Notice describes the proposed Settlement, how Settlement Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement and Plan of Allocation are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form.² By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

2. This Claim Form is for members of the “Settlement Class,” which consists of all persons and entities that, between July 10, 2019, through August 4, 2022, both dates inclusive (the “Settlement Class Period”), purchased or otherwise acquired the publicly traded shares of Virgin Galactic Holdings, Inc. (“Virgin Galactic”) (ticker symbol: SPCE) and/or Social Capital Hedosophia Holdings Corp. (“Social Capital”) (ticker symbol: IPOA) common stock.³ All persons and entities that are members of the Settlement Class are referred to as “Settlement Class Members.”

3. Excluded from the Settlement Class are: (a) persons and entities that suffered no compensable losses; and (b)(i) Defendants; (ii) any person who served as an officer or director of Virgin Galactic, Social Capital, and/or subsidiaries of either during the Settlement Class Period, and their Immediate Family; (iii) persons or entities who held shares of Vieco 10 Ltd. as of October 25, 2019, and all subsidiaries thereof; (iv) any trust of which an Individual Defendant was or is the settlor or which was or is for the benefit of an Individual Defendant and/or member(s) of their immediate families; (v) Defendants’ liability insurance carriers; (vi) Virgin Group Holdings Limited and each of its controlled subsidiaries and affiliates; (vii) the legal representatives, heirs, successors, predecessors, and assigns of any person or entity excluded under provisions (i) through (vi) hereof; and (viii) all entities controlled by the persons and entities excluded under provisions (i) through (vii) hereof. Also excluded from the Settlement Class are any persons and entities who or which submit a request for exclusion from the Settlement Class that is accepted by the Court.

4. If you are not a Settlement Class Member, do not submit a Claim Form. **YOU MAY NOT, DIRECTLY OR INDIRECTLY, PARTICIPATE IN THE SETTLEMENT IF YOU ARE NOT A SETTLEMENT CLASS MEMBER. THUS, IF YOU ARE EXCLUDED FROM THE SETTLEMENT CLASS (AS SET FORTH IN PARAGRAPH 3 ABOVE), ANY CLAIM FORM THAT YOU SUBMIT, OR THAT MAY BE SUBMITTED ON YOUR BEHALF, WILL NOT BE ACCEPTED.**

5. If you are a Settlement Class Member, you will be bound by the terms of any judgments or orders entered in the Action **WHETHER OR NOT YOU SUBMIT A CLAIM FORM**, unless you submit a request for exclusion from the Settlement Class. Thus, if you are a Settlement Class Member, the Judgment will release, and enjoin the filing or continued prosecution of, the Released Plaintiffs’ Claims against the Released Defendants’ Parties.

6. You are eligible to participate in the distribution of the Net Settlement Fund only if you are a member of the Settlement Class and if you complete and return this form as specified below. If you fail to submit a timely, properly addressed, and completed Claim Form with the required documentation, your claim may be rejected, and you may be precluded from receiving any distribution from the Net Settlement Fund.

² The Notice is only a summary of the Settlement. All of the terms of the Settlement, including the Releases and the meanings of the undefined capitalized terms used in this Claim Form, can be found in the Stipulation and Agreement of Settlement (the “Stipulation”), which is available at www.VirginGalacticSecuritiesSettlement.com.

³ “Virgin Galactic Securities” means, collectively, the publicly traded shares of Virgin Galactic and Social Capital common stock.

7. Submission of this Claim Form does not guarantee that you will share in the proceeds of the Settlement. The distribution of the Net Settlement Fund will be governed by the Plan of Allocation set forth in the Notice, if it is approved by the Court, or by such other plan of allocation approved by the Court.

8. Use the Schedule of Transactions in Part III of this Claim Form to supply all required details of your transaction(s) (including free transfers) in and holdings of the applicable publicly traded Virgin Galactic Securities. Failure to report all transaction and holding information during the requested time periods may result in the rejection of your claim.

9. Please note: Only publicly traded Virgin Galactic Securities purchased or otherwise acquired during the Settlement Class Period (*i.e.*, from July 10, 2019, through August 4, 2022, both dates inclusive) are eligible under the Settlement.

10. You are required to submit genuine and sufficient documentation for all of your transactions and holdings of the applicable Virgin Galactic Securities set forth in the Schedule of Transactions in Part III of this Claim Form. Documentation may consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from your broker containing the transactional and holding information found in a broker confirmation slip or account statement. The Parties and the Claims Administrator do not independently have information about your investments in Virgin Galactic and Social Capital common stock. **IF SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN COPIES OR EQUIVALENT CONTEMPORANEOUS DOCUMENTS FROM YOUR BROKER. FAILURE TO SUPPLY THIS DOCUMENTATION MAY RESULT IN THE REJECTION OF YOUR CLAIM. DO NOT SEND ORIGINAL DOCUMENTS. Please keep a copy of all documents that you send to the Claims Administrator. Also, please do not highlight any portion of the Claim Form or any supporting documents.**

11. Separate Claim Forms should be submitted for each separate legal entity (*e.g.*, a claim from joint owners should not include separate transactions through an account that is in the name of just one of the joint owners, and an individual should not combine his or her IRA transactions with transactions made through an account in the individual's name). Conversely, a single Claim Form should be submitted on behalf of one legal entity including all transactions made by that entity on one Claim Form, no matter how many separate accounts that entity has (*e.g.*, a corporation with multiple brokerage accounts should include all transactions made in all accounts on one Claim Form).

12. All joint beneficial owners must sign this Claim Form. If you purchased or otherwise acquired publicly traded Virgin Galactic Securities during the Settlement Class Period and held the securities in your name, you are the beneficial owner as well as the record owner and you must sign this Claim Form to participate in the Settlement. If, however, you purchased or otherwise acquired publicly traded Virgin Galactic Securities during the Settlement Class Period and the securities were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial owner of these securities, but the third party is the record owner. The beneficial owner, not the record owner, must sign this Claim Form.

13. Agents, executors, administrators, guardians, and trustees must complete and sign the Claim Form on behalf of persons represented by them, and they must:

- (a) expressly state the capacity in which they are acting;
- (b) identify the name, account number, Social Security Number (or taxpayer identification number), address, and telephone number of the beneficial owner of (or other person or entity on whose behalf they are acting with respect to) the Virgin Galactic Securities; and
- (c) furnish herewith evidence of their authority to bind to the Claim Form the person or entity on whose behalf they are acting. (Authority to complete and sign a Claim Form cannot be established by stockbrokers demonstrating only that they have discretionary authority to trade stock in another person's accounts.)

14. By submitting a signed Claim Form, you will be swearing that you:

- (a) own(ed) the Virgin Galactic Securities you have listed in the Claim Form; or

(b) are expressly authorized to act on behalf of the owner thereof.

15. By submitting a signed Claim Form, you will be swearing to the truth of the statements contained therein and the genuineness of the documents attached thereto, subject to penalties of perjury under the laws of the United States of America. The making of false statements, or the submission of forged or fraudulent documentation, will result in the rejection of your claim and may subject you to civil liability or criminal prosecution.

16. If the Court approves the Settlement, payments to eligible Authorized Claimants pursuant to the Plan of Allocation (or such other plan of allocation as the Court approves) will be made after the completion of all claims processing. This could take substantial time. Please be patient.

17. PLEASE NOTE: As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her or its pro rata share of the Net Settlement Fund. If the prorated payment to any Authorized Claimant, however, calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

18. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Claims Administrator, Strategic Claims Services, by email at info@strategicclaims.net, or by toll-free phone at (866) 274-4004, or you may download the documents from the Settlement website, www.VirginGalacticSecuritiesSettlement.com.

19. NOTICE REGARDING INSTITUTIONAL FILERS: Representatives with authority to file on behalf of (a) accounts of multiple Settlement Class Members and/or (b) institutional accounts with large numbers of transactions (“Representative Filers”) must submit information regarding their transactions in an electronic spreadsheet format. If you are a Representative Filer, you must contact the Claims Administrator at efile@strategicclaims.net or visit their website at www.VirginGalacticSecuritiesSettlement.com to obtain the required file layout. Claims which are not submitted in electronic spreadsheet format and in accordance with the Claims Administrator’s instructions may be subject to rejection. All Representative Filers MUST also submit a manually signed Claim Form for each Settlement Class Member, as well as proof of authority to file (see Item 13 of the General Instructions), along with the electronic spreadsheet format. No claims submitted in electronic spreadsheet format will be considered to have been properly submitted unless the Claims Administrator issues to the Claimant a written acknowledgment of receipt and acceptance of electronically submitted data.

20. NOTICE REGARDING ONLINE FILING: Claimants who are not Representative Filers may submit their claims online using the electronic version of the Claim Form hosted at www.VirginGalacticSecuritiesSettlement.com. If you are not acting as a Representative Filer, you do not need to contact the Claims Administrator prior to filing; you will receive an automated e-mail confirming receipt once your Claim Form has been submitted. If you are unsure if you should submit your claim as a Representative Filer, please contact the Claims Administrator at info@strategicclaims.net or (866) 274-4004. If you are not a Representative Filer, but your claim contains a large number of transactions, the Claims Administrator may request that you also submit an electronic spreadsheet showing your transactions to accompany your claim.

IMPORTANT: PLEASE NOTE

YOUR CLAIM IS NOT DEEMED FILED UNTIL YOU RECEIVE AN ACKNOWLEDGEMENT POSTCARD OR CONFIRMATION EMAIL. THE CLAIMS ADMINISTRATOR WILL ACKNOWLEDGE RECEIPT OF YOUR CLAIM FORM BY MAIL OR EMAIL WITHIN 60 DAYS. IF YOU DO NOT RECEIVE AN ACKNOWLEDGEMENT POSTCARD OR CONFIRMATION EMAIL WITHIN 60 DAYS, PLEASE CALL THE CLAIMS ADMINISTRATOR TOLL FREE AT (866) 274-4004.

PART III – SCHEDULE OF TRANSACTIONS IN VIRGIN GALACTIC SECURITIES

Complete this Part III if and only if you purchased or otherwise acquired publicly traded shares of Virgin Galactic (ticker symbol: SPCE) and/or Social Capital (ticker symbol: IPOA) common stock during the period from July 10, 2019 through and including August 4, 2022. Please include proper documentation with your Claim Form as described in detail in Part II – General Instructions, Paragraph 10, above. Do not include information in this section regarding securities other than Virgin Galactic Securities.

1. BEGINNING HOLDINGS – State the total number of shares of Virgin Galactic Securities held as of the opening of trading on July 10, 2019. (Must be documented.) If none, write “zero” or “0.” _____

2. PURCHASES/ACQUISITIONS DURING THE SETTLEMENT CLASS PERIOD THROUGH AUGUST 4, 2022 – Separately list each and every purchase/acquisition (including free receipts) of Virgin Galactic Securities from after the opening of trading on July 10, 2019, through and including the close of trading on August 4, 2022. (Must be documented.)

Date of Purchase / Acquisition (List Chronologically) (Month/Day/Year)	Ticker Symbol (IPOA or SPCE)	Number of Shares Purchased/ Acquired	Purchase/ Acquisition Price Per Share	Total Purchase/ Acquisition Price (excluding taxes, commissions, and fees)	Acquired by Warrant Exercise / Option Exercise or Assignment / Unit Separation (Y/N)	Type of Acquisition (W for Warrant, O for Option, U for Unit)	Date of Warrant or Unit Purchase / Acquisition (Month / Day / Year)
/ /			\$	\$			
/ /			\$	\$			
/ /			\$	\$			
/ /			\$	\$			

3. SALES DURING THE SETTLEMENT CLASS PERIOD THROUGH AUGUST 4, 2022 – Separately list each and every sale/disposition (including free deliveries) of Virgin Galactic Securities from after the opening of trading on July 10, 2019, through and including the close of trading on August 4, 2022. (Must be documented.)

IF NONE, CHECK HERE

Date of Sale (List Chronologically) (Month/Day/Year)	Ticker Symbol (IPOA or SPCE)	Number of Shares Sold	Sale Price Per Share	Total Sale Price (excluding taxes, commissions, and fees)
/ /			\$	\$
/ /			\$	\$
/ /			\$	\$
/ /			\$	\$

4. Ending Holdings – State the total number of shares of Virgin Galactic Securities held as of the close of trading on August 4, 2022. (Must be documented.) If none, write “zero” or “0.” _____

IF YOU NEED ADDITIONAL SPACE TO LIST YOUR TRANSACTIONS YOU MUST PHOTOCOPY THIS PAGE AND CHECK THIS BOX
IF YOU DO NOT CHECK THIS BOX THESE ADDITIONAL PAGES WILL NOT BE REVIEWED

PART IV – RELEASE OF CLAIMS AND SIGNATURE

YOU MUST ALSO READ THE RELEASE AND CERTIFICATION BELOW AND SIGN ON PAGE 8 OF THIS CLAIM FORM.

I (we) hereby acknowledge that as of the Effective Date of the Settlement, pursuant to the terms set forth in the Stipulation, I (we), on behalf of myself (ourselves) and on behalf of any other person or entity legally entitled to bring Released Plaintiffs' Claims (as defined in the Stipulation) on my (our) behalf in such capacity only, shall be deemed to have, and by operation of law and of the Judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Plaintiffs' Claim (including, without limitation, Unknown Claims) against the Defendants and the other Released Defendants' Parties, and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiffs' Claims directly or indirectly against any of the Released Defendants' Parties.

CERTIFICATION

By signing and submitting this Claim Form, the Claimant(s) or the person(s) who represent(s) the Claimant(s) certifies (certify) as follows:

1. that I (we) have read and understand the contents of the Notice and this Claim Form, including the releases provided for in the Settlement and the terms of the Plan of Allocation;
2. that the Claimant(s) is a (are) Settlement Class Member(s), as defined in the Notice and in paragraph 2 on page 3 of this Claim Form, and is (are) not excluded from the Settlement Class by definition or pursuant to request as set forth in the Notice and in paragraph 3 on page 3 of this Claim Form;
3. that I (we) own(ed) the publicly traded Virgin Galactic Securities identified in this Claim Form and have not assigned the claim against the Released Defendants' Parties to another, or that, in signing and submitting this Claim Form, I (we) have the authority to act on behalf of the owner(s) thereof;
4. that the Claimant(s) submit(s) to the jurisdiction of the Court with respect to Claimant's (Claimants') claim and for purposes of enforcing the releases set forth herein;
5. that I (we) agree to furnish such additional information with respect to this Claim Form as Lead Counsel, the Claims Administrator or the Court may require;
6. that the Claimant(s) waive(s) the right to trial by jury, to the extent it exists, and agree(s) to the Court's summary disposition of the determination of the validity or amount of the claim made by this Claim Form;
7. that I (we) acknowledge that the Claimant(s) will be bound by and subject to the terms of any judgment(s) that may be entered in the Action; and
8. that the Claimant(s) is (are) NOT subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code because: (a) the Claimant(s) is (are) exempt from backup withholding; or (b) the Claimant(s) has (have) not been notified by the IRS that he/she/it/they is (are) subject to backup withholding as a result of a failure to report all interest or dividends; or (c) the IRS has notified the Claimant(s) that he/she/it/they is (are) no longer subject to backup withholding. **If the IRS has notified the Claimant(s) that he, she, it, or they is (are) subject to backup withholding, please strike out the language in the preceding sentence indicating that the claim is not subject to backup withholding in the certification above.**

VIRGIN GALACTIC

UNDER THE PENALTIES OF PERJURY, I (WE) CERTIFY THAT ALL OF THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE, AND THAT THE DOCUMENTS SUBMITTED HEREWITH ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.

Signature of Claimant

Date

Print your name here

Signature of joint Claimant, if any

Date

Print your name here

If the Claimant is other than an individual, or is not the person completing this form, the following also must be provided:

Signature of person signing on behalf of Claimant

Date

Print your name here

CAPACITY OF PERSON SIGNING ON BEHALF OF CLAIMANT, IF OTHER THAN AN INDIVIDUAL, *E.G.*, EXECUTOR, PRESIDENT, TRUSTEE, CUSTODIAN, *ETC.* (MUST PROVIDE EVIDENCE OF AUTHORITY TO ACT ON BEHALF OF CLAIMANT – SEE PARAGRAPH 13 ON PAGE 4 OF THIS CLAIM FORM.)

THIS CLAIM FORM MUST BE MAILED TO THE CLAIMS ADMINISTRATOR BY FIRST-CLASS MAIL, **POSTMARKED NO LATER THAN AUGUST 13, 2026**, ADDRESSED AS FOLLOWS:

Virgin Galactic Securities Litigation
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson Street, Suite 205
Media, PA 19063

OR SUBMITTED ONLINE BY 11:59 P.M. ET ON AUGUST 13, 2026 at WWW.VIRGINGALACTICSECURITIESSETTLEMENT.COM.

A Claim Form received by the Claims Administrator shall be deemed to have been submitted when posted, if a postmark date on or before August 13, 2026 is indicated on the envelope and it is mailed First Class and addressed in accordance with the above instructions. In all other cases, a Claim Form shall be deemed to have been submitted when actually received by the Claims Administrator.

You should be aware that it will take a significant amount of time to fully process all of the Claim Forms. Please be patient and notify the Claims Administrator of any change of address.

Virgin Galactic Securities Litigation
c/o Strategic Claims Services
600 N. Jackson Street, Suite 205
Media, PA 19063

IMPORTANT LEGAL NOTICE – PLEASE FORWARD

REMINDER CHECKLIST:

1. Please sign the above release and certification. If this Claim Form is being made on behalf of joint Claimants, then both must sign.
2. Remember to attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
3. Please do not highlight any portion of the Claim Form or any supporting documents.
4. Do not send original security certificates or documentation. These items cannot be returned to you by the Claims Administrator.
5. Keep copies of the completed Claim Form and documentation for your own records.
6. The Claims Administrator will acknowledge receipt of your Claim Form by mail or email within 60 days. Your claim is not deemed filed until you receive an acknowledgement postcard or email. **If you do not receive an acknowledgement postcard or email within 60 days, please call the Claims Administrator toll free at (866) 274-4004.**
7. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, please send the Claims Administrator written notification of your new address. If you change your name, please inform the Claims Administrator.
8. If you have any questions or concerns regarding your claim, please contact the Claims Administrator at the address below, by email at info@strategicclaims.net, or toll-free at (866) 274-4004, or visit www.VirginGalacticSecuritiesSettlement.com. Please **DO NOT** call Defendants or their counsel with questions regarding your claim.

AFFIDAVIT

STATE OF NEW JERSEY)
) ss:
CITY OF MONMOUTH JUNCTION, in the COUNTY OF MIDDLESEX)

I, Wayne Sidor, being duly sworn, depose and say that I am the Advertising Clerk for the Publisher of Investor's Business Daily, a weekly national newspaper of general circulation throughout the United States, and that the notice attached to this Affidavit has been regularly published in Investor's Business Daily for National distribution for

1 insertion(s) on the following date(s): 04/27/2026

ADVERTISER: VIRGIN GALACTIC HOLDINGS, INC..

and that the foregoing statements are true and correct to the best of my knowledge.

Wayne Sidor

Sworn to
before me this
27th day of
April 2026

[Signature]
Notary Public



MUTUAL FUND PERFORMANCE

3-Mo Performance Rating	YTD % Change	12-Mo % Change	5-Yr % Change	Net Asset Value	NAV	3-Mo Performance Rating	YTD % Change	12-Mo % Change	5-Yr % Change	Net Asset Value	NAV	3-Mo Performance Rating	YTD % Change	12-Mo % Change	5-Yr % Change	Net Asset Value	NAV	3-Mo Performance Rating	YTD % Change	12-Mo % Change	5-Yr % Change	Net Asset Value	NAV	
Investment Funds A						Lazard Instst						A+ Multi-Cap							A+ LpOp Gro					
\$127.5 bil 800-959-4246				\$23.2 bil	800-823-6300	\$23.2 bil 800-823-6300						\$23.2 bil 800-823-6300							\$1.8 bil	800-997-7327				
C-ActiveAlloc	+4 +2	+5	15.71	-0.08		A-Emg Mkt Eq	+16 +7	+9	28.71	-0.40		A-Sci & Tech	+4 +4	+1	34.12	-0.80			\$1.8 bil	800-997-7327				
A-Cap Appr	+4 +4	+6	88.61	-0.41		B-GLStdtInfr	+10 +8	+9	19.87	0.23		A-SustainWorl	+6 +3	+7	33.43	-0.14			\$1.8 bil	800-997-7327				
A-Charter	+2 +2	+6	21.75	-0.02		Legg Mason I						B-TargetRet20	+5 +3	+5	15.00	-0.08			\$1.8 bil	800-997-7327				
B-Comstock	+6 +2	+8	32.37	0.16		C-Intl Gro	+2 -2	+3	75.45	-0.54		E-Tax-Exclnt-T	+1 +1	+2	12.66	0.00			\$1.8 bil	800-997-7327				
A-DisruptMCS	+18 +11	+3	31.65	0.21		A-Opportunity	+5 +0	+2	56.68	-0.50		D-Tax-ExLng-T	+2 +2	+1	12.11	0.00			\$1.8 bil	800-997-7327				
C-Div Inc	+5 +3	+6	27.56	0.24		Loomis Sayles Fds						A-US Equity	+3 +2	+8	13.65	-0.05			\$1.8 bil	800-997-7327				
B-Dvsd Div	+4 +2	+6	19.02	0.12		D-Bond	+1 +0	+1	12.15	-0.03		C-EmkTsincom	+3 +2	+1	7.05	-0.01			\$1.8 bil	800-997-7327				
C-Eq & Income	+5 +2	+4	11.50	0.03		A-Intl Gro	+2 -2	+3	75.45	-0.54		A-RelativeVal	+7 +4	+9	15.96	0.06			\$1.8 bil	800-997-7327				
A-Eq-Wld 500	+6 +2	+5	76.35	-0.05		B-Global Fd	+1 +0	+3	87.35	-0.10		A-SelectEqvt	-2 +0	+6	29.50	-0.48			\$1.8 bil	800-997-7327				
B-Global Fd	+1 +0	+3	87.35	-0.10		Lord Abbett A						C-Bond	+1 +1	+2	10.65	-0.01			\$1.8 bil	800-997-7327				
A+Gold & SM	+9 +9	+16	64.48	-1.11		\$42.2 bil 888-522-2388						D-Intm-TermBd	+1 +1	0	9.23	-0.01			\$1.8 bil	800-997-7327				
B-Gr & Income	+6 +3	+6	24.14	0.08		A-Affilted	+7 +3	+7	21.42	0.19		A-Intl Gold	+14 +5	+20	29.69	-0.61			\$1.8 bil	800-997-7327				
E-HY Mun	+2 +2	+1	8.31	0.00		A-Div Gro	+5 +3	+8	26.20	0.03		Vanguard Funds Adm							\$1.8 bil	800-997-7327				
A-Main SAC	+2 +2	+7	31.03	-0.08		A-Fund Eq	+4 +2	+7	17.02	0.01		\$2837 bil 800-662-2739							\$1.8 bil	800-997-7327				
B-Main St MC	+5 +1	+4	30.12	0.11		A-Gro Opp	+8 +3	+1	28.70	0.03		A-500 Idx	+4 +3	+10	656.32	-2.7			\$1.8 bil	800-997-7327				
A-Main Street	+1 +1	+6	63.26	-0.10		D-HI Mun	+2 +1	+1	10.67	-0.01		B-Bal Idx	+3 +2	+5	52.63	-0.17			\$1.8 bil	800-997-7327				
E-Muni Income	+2 +2	+0	11.73	0.00		E-Int TxFr	+1 +0	+1	10.32	0.00		E-CA Intm-Tm	+1 +1	+2	11.55	0.00			\$1.8 bil	800-997-7327				
B-Rising Div	+3 +2	+7	27.30	0.04		A-Intl Val	+5 +2	+6	19.99	-0.07		A-CA Intm-Tm	+1 +1	+1	11.50	0.00			\$1.8 bil	800-997-7327				
E-RO Muni Opp	+2 +1	+1	6.59	0.00		B-MA Bal	+3 +1	+3	13.86	-0.01		A-Cap Opp	+7 +6	+8	231.35	-1.5			\$1.8 bil	800-997-7327				
R-RO NY Mun	+2 +2	+0	14.46	0.00		E-Natl TdF	+1 +1	+1	10.34	0.00		A-Comm Indx	+1 +1	+6	99.51	-0.78			\$1.8 bil	800-997-7327				
A-S&P 500 Idx	+4 +3	+8	74.71	-0.31		Lord Abbett I						B-Dev Mkt	+9 +4	+7	21.79	-0.14			\$1.8 bil	800-997-7327				
A-SC Value	+20 +8	+12	30.42	0.09		\$49.9 bil 888-522-2388						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
C-SIRskModln	+5 +2	+2	12.64	-0.06		D-Bond Deb	+1 +0	+1	7.19	-0.01		E-CA Intm-Tm	+1 +1	+1	11.50	0.00			\$1.8 bil	800-997-7327				
A-SP MLP A1	+14 +10	+2	9.03	0.04		A-Convert	+13 +6	+2	19.31	-0.03		A-CA Intm-Tm	+1 +1	+1	11.50	0.00			\$1.8 bil	800-997-7327				
A-SP MLP In	+16 +10	+7	6.69	0.03		D-Fit Rte	+1 +0	+3	7.98	0.00		A-Cap Opp	+7 +6	+8	231.35	-1.5			\$1.8 bil	800-997-7327				
A+Tech	+21 +13	+6	70.43	0.26		D-High Yld	+1 +0	+1	6.25	0.00		A-Comm Indx	+1 +1	+6	99.51	-0.78			\$1.8 bil	800-997-7327				
A+Summit	+2 +3	+4	29.46	-0.22		A-Intl Eq	+10 +4	+6	19.99	-0.12		B-Dev Mkt	+9 +4	+7	21.79	-0.14			\$1.8 bil	800-997-7327				
Investment Funds Y						D-Shr Dur	+1 +1	+1	3.86	0.00		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
\$22.0 bil 800-959-4246						-M-N-O-						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
C-Dev Mkt	+10 +3	0	37.37	-0.56		MainStay Fds A						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
A-Discovery	+21 +9	+5	154.20	-0.07		\$8.9 bil 800-624-6782						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
A-SP MLP SI	+19 +13	+20	11.44	0.05		D-MK HY CB	+1 +0	+1	5.19	0.00		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
Ivy Funds						A-Wnslw LCG	+1 +1	+6	8.67	-0.06		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
\$28.1 bil 800-523-1918						MainStay Fds I						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
A-Core Equity	+4 +3	+7	17.87	-0.07		\$4.5 bil 800-624-6782						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
B-LargeCapGro	+7 +7	+7	38.94	-0.47		A-Epoch GI Eq	+12 +9	+9	27.42	0.21		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
A-Science&Tec	+1 +2	+8	67.97	-0.31		A-S&P500 Idx	+4 +3	+9	75.52	-0.31		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
A-SystemMktSE	+16 +8	+1	25.78	-0.29		A-SCS	+15 +5	+3	17.41	-0.02		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
-J-K-L-						Mass Mutual						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
Janus Henderson A						\$1.7 bil 800-304-7404						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
\$30.2 bil 877-335-2687						A-8PowerGro	+5 +3	+7	188.53	-1.4		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
A-Forty	+0 +1	+5	55.51	-0.75		Marcus Funds						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
Janus Henderson C						\$2.0 bil 888-860-8686						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
\$30.2 bil 877-335-2687						A-Foc	+6 +6	+9	29.71	-0.12		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
C-Balanced	+1 +0	+5	47.50	-0.22		A-Gibl	+7 +4	+8	30.96	0.01		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
JHF III Dispal						A-MCWF	+12 +3	+7	62.46	-0.06		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
\$40.9 bil 888-972-8696						Mass Mutual						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
A-Ds Val	+9 +3	+8	27.02	0.08		\$1.7 bil 800-309-3539						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
B-DVMC	+8 +2	+6	29.54	0.10		A-BI Ch	-2 -1	+7	18.81	-0.27		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
JHIT FundCapCorfd						MassMutual Select						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
\$3.0 bil 800-225-5291						C-MCG	+3 -1	+2	17.27	-0.01		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
B-HancockFdmn	+0 -2	+5	65.90	-0.31		A-S&P500 Idx	+4 +3	+9	15.14	-0.06		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
John Hancock						A-SCS	+15 +5	+3	17.41	-0.02		B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
\$26.4 bil 800-225-5291						Matthew 25 Fund						B-Div A	+4 +2	+6	61.81	0.18			\$1.8 bil	800-997-7327				
D-HancockBond	+1 +0	0	13.61	-0.02		\$317 ml 888-625-3863						B-Div A	+4 +2	+6	61.81	0								

Josephine Bravata

From: phhubs@prnewswire.com
Sent: Monday, April 27, 2026 10:00 AM
To: Josephine Bravata
Subject: PR Newswire: Press Release Distribution Confirmation for The Rosen Law Firm, P.A.. ID#4645837-1-1

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Your press release was successfully distributed at: 27-Apr-2026 10:00:00 AM ET

Release headline: The Rosen Law Firm, P.A. and Glancy Prongay Wolke & Rotter LLP Announce Proposed Class Action Settlement on Behalf of all Persons and Entities that Purchased and/or Otherwise Acquired the Publicly Traded Shares of Virgin Galactic Holdings, Inc. (SPCE) and/or Social Capital Hedosophia Holdings Corp. (IPOA) Common Stock
Word Count: 1017
Product Selections: US1
Visibility Reports Email
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* Share Your Feedback: North American customers, please watch for our survey in your inbox tomorrow. Your input matters! Coming soon to other regions.

The Rosen Law Firm, P.A. and Glancy Prongay Wolke & Rotter LLP Announce Proposed Class Action Settlement on Behalf of all Persons and Entities that Purchased and/or Otherwise Acquired the Publicly Traded Shares of Virgin Galactic Holdings, Inc. (SPCE) and/or Social Capital Hedosophia Holdings Corp. (IPOA) Common Stock

NEWS PROVIDED BY

The Rosen Law Firm, P.A. →

Apr 27, 2026, 10:00 ET

BROOKLYN, N.Y., April 27, 2026 /PRNewswire/ -- The Rosen Law Firm, P.A. and Glancy Prongay Wolke & Rotter LLP announce that the United States District Court for the Eastern District of New York has approved the following announcement of a proposed class action settlement that would benefit all persons and entities that purchased or otherwise acquired the publicly traded shares of Virgin Galactic Holdings, Inc. (NYSE: **SPCE**) and/or Social Capital Hedosophia Holdings Corp. (NYSE: **IPOA**) common stock:

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

SUMMARY NOTICE OF (I) PENDENCY OF CLASS ACTION, CERTIFICATION OF SETTLEMENT CLASS AND PROPOSED SETTLEMENT; (II) SETTLEMENT FAIRNESS HEARING; AND (III) MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

TO: All persons and entities who or which purchased or otherwise acquired the publicly traded shares of Virgin Galactic Holdings, Inc. ("Virgin Galactic") and/or Social Capital Hedosophia Holdings Corp. common stock from July 10, 2019, through August 4, 2022, inclusive (the "Settlement Class"):¹

PLEASE READ THIS NOTICE CAREFULLY, YOUR RIGHTS WILL BE AFFECTED BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Eastern District of New York, that the above-captioned litigation (the "Action") has been preliminary certified as a class action on behalf of the Settlement Class, except for certain persons and entities who are excluded from the Settlement Class by definition as set forth in the full Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (the "Notice").

YOU ARE ALSO NOTIFIED that Plaintiffs in the Action have reached a proposed settlement of the Action for \$8,500,000 in cash (the "Settlement"), that, if approved, will resolve all claims in the Action.

A hearing will be held on July 9, 2026 at 10:00 a.m., before the Honorable Taryn A. Merkl at the United States District Court for the Eastern District of New York, Courtroom 13D South, 225 Cadman Plaza East, Brooklyn, NY 11201, to determine whether: (i) the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) the Action should be dismissed with prejudice against Defendants, and the Releases specified and described in the Stipulation (and in the Notice) should be granted; (iii) the proposed Plan of Allocation should be approved as fair and reasonable; and (iv) Lead Counsel's application for an award of attorneys' fees and reimbursement of expenses should be approved.

If you are a member of the Settlement Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Settlement Fund. The Notice and Proof of Claim and Release Form ("Claim Form") can be downloaded from the website maintained by the Claims Administrator, www.VirginGalacticSecuritiesSettlement.com. You may also obtain copies of the Notice and Claim Form by contacting the Claims Administrator at *Virgin Galactic Securities Litigation, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063*, Telephone: (866) 274-4004.

If you are a member of the Settlement Class, in order to be eligible to receive a payment under the proposed Settlement, you must submit a Claim Form to the Claims Administrator either *electronically* or *postmarked* no later than August 13, 2026. If you are a Settlement Class Member and do not submit a proper Claim Form, you will not be eligible to share in the distribution of the net proceeds of the Settlement but you will nevertheless be bound by any judgments or orders entered by the Court in the Action.

If you are a member of the Settlement Class and wish to exclude yourself from the Settlement Class, you must submit a request for exclusion to the Claims Administrator such that it is *received* no later than June 18, 2026, in accordance with the instructions set forth in the Notice. If you properly exclude yourself from the Settlement Class, you will not be bound by any judgments or orders entered by the Court in the Action and you will not be eligible to share in the proceeds of the Settlement.

Any objections to the proposed Settlement, the proposed Plan of Allocation, or Lead Counsel's motion for attorneys' fees and reimbursement of expenses, must be filed with the Court and delivered to Lead Counsel and Defendants' Counsel such that they are *received* no later than June 9, 2026, in accordance with the instructions set forth in the Notice.

Please do not contact the Court, the Clerk's office, Virgin Galactic, or its counsel regarding this notice. All questions about this notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed to Lead Counsel or the Claims Administrator.

Requests for the Notice and Claim Form should be made to:

Virgin Galactic Securities Litigation
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson St., Ste. 205
Media, PA 19063
Telephone: (866) 274-4004
Email: info@strategicclaims.net
www.VirginGalacticSecuritiesSettlement.com

Inquiries, other than requests for the Notice and Claim Form, should be made to Lead Counsel:

THE ROSEN LAW FIRM, P.A.
Jonathan Horne, Esq.
275 Madison Avenue, 40th Floor
New York, NY 10016
Telephone: (212) 686-1060
Email: info@rosenlegal.com

or

GLANCY PRONGAY WOLKE & ROTTER LLP
Ex Kano S. Sams II, Esq.
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
Email: settlements@glancylaw.com

By Order of the Court

¹ All capitalized terms used in this Summary Notice that are not otherwise defined herein are defined in the Stipulation and Agreement of Settlement dated November 3, 2025 (the "Stipulation"), which is available at www.VirginGalacticSecuritiesSettlement.com.

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Tuesday, April 21, 2026 at 10:26 AM

Ticket #156013

Status	Replied - Awaiting Reply	Name	Simon Jauncey
Priority	Normal	Email	
Department	Claims Administrators	Phone	
Create Date	4/19/26 3:46 AM	Source	Email
Assigned To		Help Topic	Claims
SLA Plan	Default SLA	Last Response	
Due Date	4/20/26 3:46 AM	Last Message	4/19/26 3:46 AM

Ticket Details**Case:** Vanguard II**Withdrawal from Virgin Galactic claim**

4/19/26 3:46 AM Withdrawal from Virgin Galactic claim

Simon Jauncey

Good morning,

Thank you for your recent postal communication with links to further information on the Virgin Galactic class action. As per the information received it is no longer beneficial to remain as part of this claim as it only favours the individuals that created the claim and any other additional claimants are receiving essentially nothing and are losing the right to pursue additional monies under later legal claims. Therefor please remove my claim from this class action and I will raise a claim at a later date under better terms.

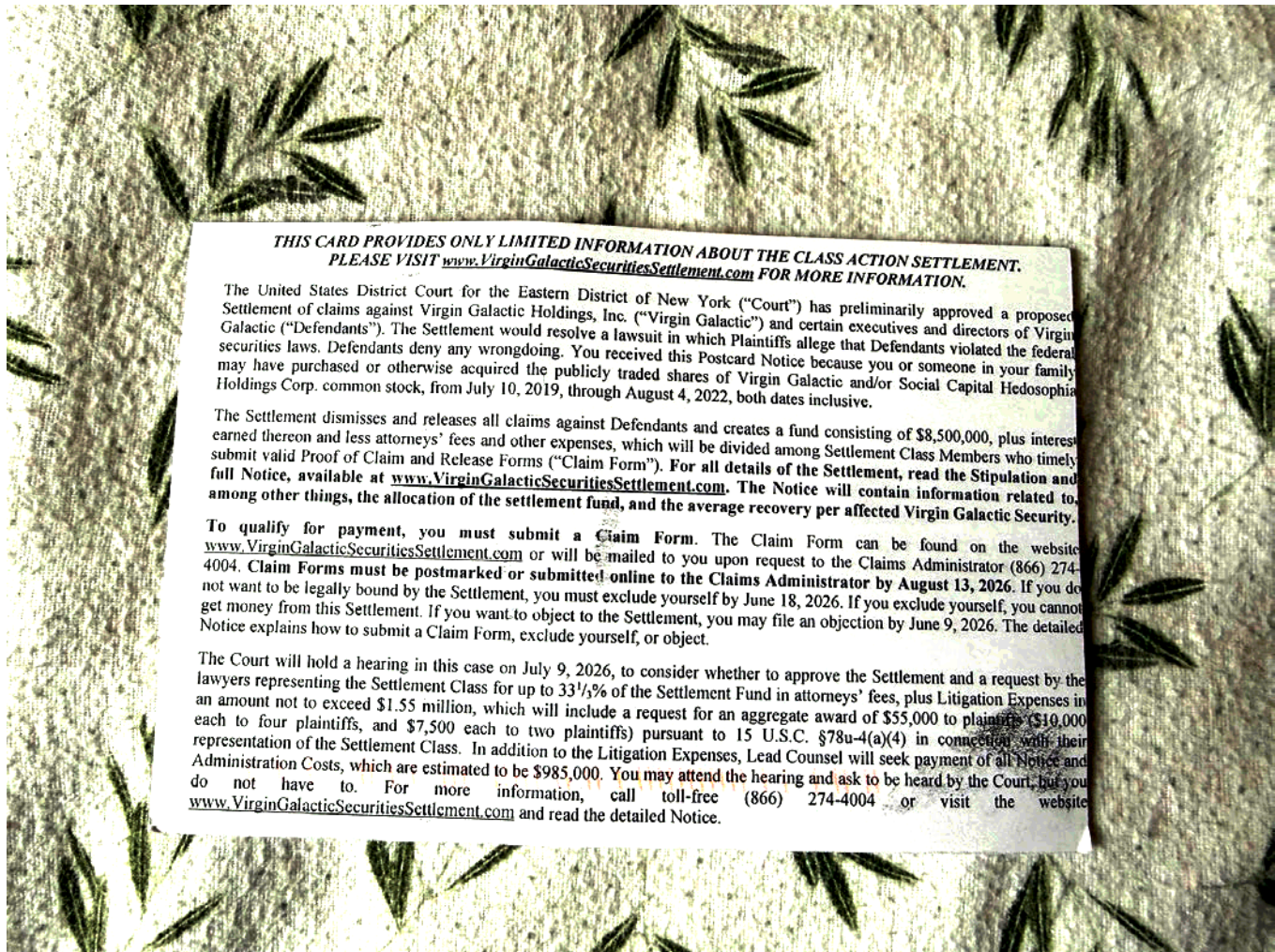
Attached is the claim submission receipt that should have all required details.

Please confirm receipt of this.

Kind regards,
Simon Jauncey

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Tuesday, April 21, 2026 at 10:26 AM



SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Tuesday, April 21, 2026 at 10:26 AM



- image0.jpeg (1.6 mb)
- image1.jpeg (1.3 mb)
- Virgin Galactic Holdings, Inc._Jauncey_20250808035543.pdf (13.3 kb)

4/20/26 8:19 AM Status Changed

Test Agent

Certification and Authorization of Named Plaintiff Pursuant to Federal Securities Laws

The individual or institution listed below (the "Plaintiff") authorizes and, upon execution of the accompanying retainer agreement by The Rosen Law Firm P.A., retains The Rosen Law Firm P.A. to file an action under the federal securities laws to recover damages and to seek other relief against Virgin Galactic Holdings, Inc. The Rosen Law Firm P.A. will prosecute the action on a contingent fee basis not to exceed one-third of the recovery and will advance all costs and expenses. All payments of fees and expenses shall be made only after Court review and approval. The Virgin Galactic Holdings, Inc. Retention Agreement provided to the Plaintiff is incorporated by reference herein and is effective, upon execution and delivery by The Rosen Law Firm P.A.

First Name: Simon
Middle Initial: P
Last Name: Jauncey
Mailing Address:
City:
State:
Zip Code:
Country:
Phone:
Email Address:

Plaintiff certifies that:

1. Plaintiff has reviewed a complaint and authorized its filing or the filing of an amended complaint.
2. Plaintiff did not acquire the security that is the subject of this action at the direction of plaintiff's counsel or in order to participate in this private action or any other litigation under the federal securities laws.
3. Plaintiff is willing to serve as a representative party on behalf of a class, including providing testimony at deposition and trial, if necessary.
4. Plaintiff represents and warrants that he/she/it is fully authorized to enter into and execute this certification.
5. Plaintiff will not accept any payment for serving as a representative party on behalf of the class beyond Plaintiff's pro rata share of any recovery, except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.
6. Plaintiff has made no transaction(s) during the Class Period in the debt or equity securities that are the subject of this action except those set forth below:

Purchases:

Type of Security	Buy Date	no of Shares	Price per Share
Common Stock	07/12/2021	88	\$49.55
Type of Security	Buy Date	no of Shares	Price per Share
Common Stock	08/10/2021	6.91825869	\$31.93
Type of Security	Buy Date	no of Shares	Price per Share
Common Stock	09/02/2021	57.62614195	\$28.46

Sales:

Type of Security	Sale Date	no of Shares	Price per Share
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Common Stock

I have not sought to serve as a representative party on behalf of a class under the federal securities laws during the last three years, except if set forth below.

Not applicable

I declare and certify under penalty of perjury, under the laws of the United States of America, that the foregoing information is true and correct. **YES**

By Signing below and submitting this certification form electronically, I intend to sign and execute this certification pursuant to California Civil Code Section 1633.1, et seq. - and the Uniform Electronic Transactions Act and retain the Rosen Law Firm, P.A. to proceed on Plaintiff's behalf, on a contingent fee basis. **YES**

Date of signing: 08/08/2025 03:55:43 at Eastern Standard Time, USA



Outlook

VIRGIN GALACTIC HOLDINGS SECURITIES LITIGATION - EXCLUSION FROM THE SETTLEMENT CLASS- I hold 8 shares in Virgin Galactic through Hargreaves Lansdown in the UK

From philip**Date** Mon 5/4/2026 7:22 AM**To** Claims Analyst <info@strategicclaims.net>

Dear Sir/Madam,

I wish to exclude myself from the Settlement Class. I do not wish to receive any payment from the Settlement Fund.

I hold 8 shares in Virgin Galactic through Hargreaves Lansdown

Please confirm that you acknowledge that I have been validly excluded from this Settlement Class.

Please reply to confirm receipt – many thanks.

Kind regards,

Philip Arnold**FCA, FIC, FloD, CMC, BSc Hons, Chartered Director****Director****Excellence in Learning****A Division of Quantum Jobs.Com Limited**

This Email and any attachments contains confidential information and is intended solely for the individual to whom it is addressed. If this Email has been misdirected, please notify the author as soon as possible. If you are not the intended recipient you must not disclose, distribute, copy, print or rely on any of the information contained, and all copies must be deleted immediately. Whilst we take reasonable steps to try to identify any software viruses, any attachments to this e-mail may nevertheless contain viruses which our anti-virus software has failed to identify. You should therefore carry out your own anti-virus checks before opening any documents. Quantum will not accept any liability for damage caused by computer viruses emanating from any attachment or other document supplied with this e-mail. Quantum reserves the right to monitor and archive all e-mail communications through its network. No representative or employee below the level of partner or director has the authority to enter into any contract on behalf of Quantum. Also no employee or officer has the authority to enter into any contract by email.

Registered in

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Friday, May 8, 2026 at 3:47 PM

Ticket #793048

Status	Completed	Name	craig stubbins
Priority	Normal	Email	
Department	Claims Administrators	Phone	
Create Date	5/8/26 3:04 PM	Source	Email
Assigned To	Test Agent	Help Topic	Claims
SLA Plan	Default SLA	Last Response	5/8/26 3:47 PM
Due Date	5/9/26 3:04 PM	Last Message	5/8/26 3:04 PM

Ticket Details**Case:** Virgin Galactic**Virgin Galactic Class Action**

5/8/26 3:04 PM Virgin Galactic Class Action	craig stubbins
<p>Hi</p> <p>I wish to exclude myself from the class action lawsuit against Virgin Galactic.</p> <p>Please can you advise what details you need from me.</p> <p>Many Thanks</p> <p>Craig</p> <p>Sent from Outlook for Android</p>	
5/8/26 3:30 PM	Test Agent
<p></p>	

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Friday, May 8, 2026 at 3:47 PM

5/8/26 3:47 PM

Test Agent

Good afternoon,

Thank you for contacting us regarding the *Virgin Galactic Securities Litigation*.

Please see p. 12 of the attached Notice/Claim Form for instructions on excluding yourself from the litigation, as below:

*Each Settlement Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written Request for Exclusion from the Settlement Class, addressed to Virgin Galactic Securities Litigation, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063. The exclusion request must be **received** no later than June 18, 2026. You will not be able to exclude yourself from the Settlement Class after that date.*

Each Request for Exclusion must: (i) state the name, address, email address (if any), and telephone number of the person or entity requesting exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity "requests exclusion from the Settlement Class in Lavin v. Virgin Galactic Holdings, Inc., Case No. 1:21-cv-03070-ARR-TAM"; and (iii) be signed by the person or entity requesting exclusion or an authorized representative.

In addition, to be valid, a request for exclusion must include documentary proof of the number and type of Virgin Galactic Securities that the person or entity requesting exclusion purchased, acquired, and sold during the Settlement Class Period, as well as the dates and prices of each such purchase/acquisition and sale.

A Request for Exclusion shall not be valid and effective unless it provides all the information called for in this paragraph and is received within the time stated above, or is otherwise accepted by the Court.

Feel free to contact us if you have any further questions.

Thank you.

Virgin Galactic - Long Notice and Claim Form v4.pdf (624.3 kb)

SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Monday, May 11, 2026 at 1:13 PM

Ticket #845135

Status	Completed
Priority	Normal
Department	Claims Administrators
Create Date	5/11/26 10:19 AM

Name	Lindsey Williams
Email	
Phone	
Source	Email

Assigned To	Test Agent
SLA Plan	Default SLA
Due Date	5/12/26 10:19 AM

Help Topic	Claims
Last Response	5/11/26 1:13 PM
Last Message	5/11/26 10:19 AM

Ticket Details

Case:	Virgin Galactic
--------------	-----------------

Virgin Galactic litigation

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Monday, May 11, 2026 at 1:13 PM

5/11/26 10:19 AM Virgin Galactic litigation

Lindsey Williams

Hello,

I would like to exclude myself from the lawsuit. How do I do that?

Thanks

Lindsey

Lindsey Williams

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Monday, May 11, 2026 at 1:13 PM

5/11/26 1:13 PM

Test Agent

Good afternoon,

Thank you for contacting us regarding the *Virgin Galactic Securities Litigation*.

Please see p. 12 of the attached Notice/Claim Form for instructions on excluding yourself from the litigation, as below:

*Each Settlement Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written Request for Exclusion from the Settlement Class, addressed to Virgin Galactic Securities Litigation, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063. The exclusion request must be **received** no later than June 18, 2026. You will not be able to exclude yourself from the Settlement Class after that date.*

Each Request for Exclusion must: (i) state the name, address, email address (if any), and telephone number of the person or entity requesting exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity "requests exclusion from the Settlement Class in Lavin v. Virgin Galactic Holdings, Inc., Case No. 1:21-cv-03070-ARR-TAM"; and (iii) be signed by the person or entity requesting exclusion or an authorized representative.

In addition, to be valid, a request for exclusion must include documentary proof of the number and type of Virgin Galactic Securities that the person or entity requesting exclusion purchased, acquired, and sold during the Settlement Class Period, as well as the dates and prices of each such purchase/acquisition and sale.

A Request for Exclusion shall not be valid and effective unless it provides all the information called for in this paragraph and is received within the time stated above, or is otherwise accepted by the Court.

Feel free to contact us if you have any further questions.

Thank you.

Virgin Galactic - Long Notice and Claim Form v4.pdf (624.3 kb)

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Tuesday, May 12, 2026 at 4:26 PM

Ticket #440569

Status	Completed	Name	J
Priority	Normal	Email	
Department	Claims Administrators	Phone	
Create Date	5/12/26 4:23 PM	Source	Email
Assigned To	Test Agent	Help Topic	Claims
SLA Plan	Default SLA	Last Response	5/12/26 4:26 PM
Due Date	5/13/26 4:23 PM	Last Message	5/12/26 4:23 PM

Ticket Details**Case:** Virgin Galactic**Regarding Case No.: 1:21-cv-03070-ARR-TAM**

5/12/26 4:23 PM Regarding Case No.: 1:21-cv-03070-ARR-TAM

J

To whom it may concern,

I am Jacob Frogel, and I purchased Virgin Galactic Securities public stock in the time period listed. I wish to be excluded from this claim. Please let me know what steps I should take.

Regards,

Jacob C. Frogel

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Tuesday, May 12, 2026 at 4:26 PM

5/12/26 4:26 PM

Test Agent

Good afternoon,

Thank you for contacting us regarding the *Virgin Galactic Securities Litigation*.

Please see p. 12 of the attached Notice/Claim Form for instructions on excluding yourself from the litigation, as below:

*Each Settlement Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written Request for Exclusion from the Settlement Class, addressed to Virgin Galactic Securities Litigation, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063. The exclusion request must be **received** no later than June 18, 2026. You will not be able to exclude yourself from the Settlement Class after that date.*

Each Request for Exclusion must: (i) state the name, address, email address (if any), and telephone number of the person or entity requesting exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity "requests exclusion from the Settlement Class in Lavin v. Virgin Galactic Holdings, Inc., Case No. 1:21-cv-03070-ARR-TAM"; and (iii) be signed by the person or entity requesting exclusion or an authorized representative.

In addition, to be valid, a request for exclusion must include documentary proof of the number and type of Virgin Galactic Securities that the person or entity requesting exclusion purchased, acquired, and sold during the Settlement Class Period, as well as the dates and prices of each such purchase/acquisition and sale.

A Request for Exclusion shall not be valid and effective unless it provides all the information called for in this paragraph and is received within the time stated above, or is otherwise accepted by the Court.

Feel free to contact us if you have any further questions.

Thank you.

Virgin Galactic - Long Notice and Claim Form v4.pdf (624.3 kb)

SUPPORT CENTER

Support Ticket System

Strategic Claims Services, Inc. Monday, May 18, 2026 at 4:14 PM

Ticket #713283

Status	Completed
Priority	Normal
Department	Claims Administrators
Create Date	5/16/26 3:35 AM

Name	Sage
Email	
Phone	
Source	Email

Assigned To	Test Agent
SLA Plan	Default SLA
Due Date	5/17/26 3:35 AM

Help Topic	Claims
Last Response	5/18/26 4:14 PM
Last Message	5/16/26 3:35 AM

Ticket Details

Case:	Virgin Galactic
--------------	-----------------

Re: Virgin Galactic Securities Litigation - Case No.: 1:21-cv-03070-ARR-TAM

5/16/26 3:35 AM	Re: Virgin Galactic Securities Litigation - Case No.: 1:21-cv-03070-ARR-TAM	Sage
-----------------	---	------

Please exclude me from the Settlement, Virgin Galactic Securities Litigation - Case No.: 1:21-cv-03070-ARR-TAM

Sage J Kurtz

Thank you

On Fri, May 15, 2026 at 9:29 PM Claims Administrator <info@virgingalacticsecuritiessettlement.com> wrote:

Virgin Galactic Securities Litigation - Case No.: 1:21-cv-03070-ARR-TAM

Your contact information was provided to us, as we are the Claims Administrator for the above referenced litigation. For more information on the settlement, please visit the Settlement

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Monday, May 18, 2026 at 4:14 PM

Website at: www.VirginGalacticSecuritiesSettlement.com. Please find a PDF of the NOTICE OF (I) PENDENCY OF CLASS ACTION, CERTIFICATION OF SETTLEMENT CLASS, AND PROPOSED SETTLEMENT; (II) SETTLEMENT FAIRNESS HEARING; AND (III) MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES and PROOF OF CLAIM AND RELEASE FORM at:

<https://virgingalacticsecuritiessettlement.com/wp-content/uploads/sites/17/2026/04/Virgin-Galactic-Long-Notice-and-Claim-Form-v4.pdf>.

In order to be eligible to participate in the settlement fund, you must fill out a PROOF OF CLAIM AND RELEASE FORM. The PROOF OF CLAIM AND RELEASE FORM, along with supporting documentation, can either be submitted online at <https://virgingalacticsecuritiessettlement.com/file-a-claim-online/> by 11:59 p.m. EST on August 13, 2026, or be postmarked no later than August 13, 2026 to: *Virgin Galactic Securities Litigation*, c/o Strategic Claims Services, 600 N. Jackson Street, Suite 205, Media, PA 19063.

If you have any questions, please contact us toll-free at 866-274-4004.

Regards,

Claims Administrator

If you would like to unsubscribe from future email communications regarding this case, please click the link below. We are the Claims Administrator for this case and we were provided your information because you were identified as a potential Settlement Class Member. Your information will only be used to provide you communications regarding this case and not for any other purpose.

Unsubscribing from emails regarding this case does not remove you from the class list and you may still receive communications via regular mail as required by the court. Unsubscribing from emails is not the same as opting out or excluding yourself from the case. Please refer to the information you received about the case for more information regarding that process.

I have read the above and would like to unsubscribe from future email communications regarding this case. [click here to unsubscribe](#).

--
Sage K.

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Monday, May 18, 2026 at 4:14 PM

~ This message, email or aural contact, is private between myself and those directly associated with this contact, and thus subject to all privacy laws protected within the Communications Privacy Act 18 USCS § 2510 ~

5/18/26 4:14 PM

Test Agent

Good afternoon,

Thank you for contacting us regarding the *Virgin Galactic Securities Litigation*.

Please see p. 12 of the attached Notice/Claim Form for instructions on excluding yourself from the litigation, as below:

*Each Settlement Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written Request for Exclusion from the Settlement Class, addressed to Virgin Galactic Securities Litigation, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063. The exclusion request must be **received** no later than June 18, 2026. You will not be able to exclude yourself from the Settlement Class after that date.*

Each Request for Exclusion must: (i) state the name, address, email address (if any), and telephone number of the person or entity requesting exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity "requests exclusion from the Settlement Class in Lavin v. Virgin Galactic Holdings, Inc., Case No. 1:21-cv-03070-ARR-TAM"; and (iii) be signed by the person or entity requesting exclusion or an authorized representative.

In addition, to be valid, a request for exclusion must include documentary proof of the number and type of Virgin Galactic Securities that the person or entity requesting exclusion purchased, acquired, and sold during the Settlement Class Period, as well as the dates and prices of each such purchase/acquisition and sale.

A Request for Exclusion shall not be valid and effective unless it provides all the information called for in this paragraph and is received within the time stated above, or is otherwise accepted by the Court.

Feel free to contact us if you have any further questions.

Thank you.

Virgin Galactic - Long Notice and Claim Form v4.pdf (624.3 kb)

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Friday, May 22, 2026 at 10:45 AM

Ticket #282648

Status	Completed	Name	Marty Dunlop
Priority	Normal	Email	
Department	Claims Administrators	Phone	
Create Date	5/22/26 8:15 AM	Source	Email
Assigned To	Test Agent	Help Topic	Claims
SLA Plan	Default SLA	Last Response	5/22/26 10:45 AM
Due Date	5/23/26 8:15 AM	Last Message	5/22/26 8:15 AM

Ticket Details**Case:** Virgin Galactic**VIRGIN GALACTIC HOLDINGS SECURITIES LITIGATION**

5/22/26 8:15 AM VIRGIN GALACTIC HOLDINGS SECURITIES LITIGATION	Marty Dunlop
Case No.: 1:21-cv-03070-ARR-TAM	
Hi,	
I am trying to exclude myself from this case, however despite 'exclusion' being offered as an option, there is no information at all regarding the process for this.	
Thanks,	
Marty Dunlop	
Director	

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Friday, May 22, 2026 at 10:45 AM

5/22/26 10:45 AM

Test Agent

Good morning,

Thank you for contacting us regarding the *Virgin Galactic Securities Litigation*.

Please see p. 12 of the attached Notice/Claim Form for instructions on excluding yourself from the litigation, as below:

*Each Settlement Class Member will be bound by all determinations and judgments in this lawsuit, whether favorable or unfavorable, unless such person or entity mails or delivers a written Request for Exclusion from the Settlement Class, addressed to Virgin Galactic Securities Litigation, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson St., Ste. 205, Media, PA 19063. The exclusion request must be **received** no later than June 18, 2026. You will not be able to exclude yourself from the Settlement Class after that date.*

Each Request for Exclusion must: (i) state the name, address, email address (if any), and telephone number of the person or entity requesting exclusion, and in the case of entities, the name and telephone number of the appropriate contact person; (ii) state that such person or entity "requests exclusion from the Settlement Class in Lavin v. Virgin Galactic Holdings, Inc., Case No. 1:21-cv-03070-ARR-TAM"; and (iii) be signed by the person or entity requesting exclusion or an authorized representative.

In addition, to be valid, a request for exclusion must include documentary proof of the number and type of Virgin Galactic Securities that the person or entity requesting exclusion purchased, acquired, and sold during the Settlement Class Period, as well as the dates and prices of each such purchase/acquisition and sale.

A Request for Exclusion shall not be valid and effective unless it provides all the information called for in this paragraph and is received within the time stated above, or is otherwise accepted by the Court.

Feel free to contact us if you have any further questions.

Thank you.

Virgin Galactic - Long Notice and Claim Form v4.pdf (624.3 kb)

SUPPORT CENTER
Support Ticket System

Strategic Claims Services, Inc. Wednesday, May 13, 2026 at 3:58 PM

Ticket #808655

Status	New	Name	Benjamin Wallace
Priority	Normal	Email	
Department	Claims Administrators	Phone	
Create Date	5/13/26 3:50 PM	Source	Email
Assigned To		Help Topic	Claims
SLA Plan	Default SLA	Last Response	
Due Date	5/14/26 3:50 PM	Last Message	5/13/26 3:50 PM

Ticket Details

Case:	Virgin Galactic
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Case No.: 1:21-cv-03070-ARR-TAM

5/13/26 3:50 PM Case No.: 1:21-cv-03070-ARR-TAM	Benjamin Wallace
<p>It is my intent to file a formal objection and ask for a continuance to allow adequate time to obtain proper legal counsel and to contact other class members if they feel the same.</p> <p>Attached is the draft that I plan to send certified mail in the next 72hrs from this email.</p> <p>gala_260513_141013.pdf (142.3 kb)</p>	

Benjamin Wallace

May 13, 2026
Clerk of the Court
United States District Court for the Eastern District of New York
Courtroom 13D South 225 Cadman Plaza East
Brooklyn, NY 11201

RE: Objection to Class Action Settlement in Virgin Galactic Securities Litigation, Case No.:
1:21-cv-03070-ARR-TAM

To the Honorable Allyne R. Ross:

I, Benjamin Wallace, am a member of the Settlement Class in the above-referenced lawsuit because I purchased publicly traded common stock between 06/2019 and 08/2022.

I am writing to formally object to the proposed settlement for the following reasons:

1. Inadequate Compensation: The proposed settlement amount does not fairly compensate class members for the harm suffered. The payment hardly covers even a fraction of the actual loss.

2. Excessive Attorney Fees: The requested attorney fees are disproportionately high compared to the actual recovery for individual class members.

3. The notice process was insufficient.

I intend to appear at the Fairness Hearing scheduled for July 9, 2026 to speak in support of my objection.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Benjamin Wallace

EXHIBIT 4

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

DECLARATION OF NAMED PLAINTIFF JENNIFER ORTIZ

I, Jennifer Ortiz, declare as follows:

1. I am a named Plaintiff in the above-captioned securities class action (the “Action”).¹ See ECF No. 35. I respectfully submit this declaration in support of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein.

I. OVERSIGHT OF THE LITIGATION

3. I have been actively involved in this Action since I was named as an additional Plaintiff in the Amended Class Action Complaint for Violations of the Federal Securities Laws. ECF No. 35.

4. In fulfillment of my responsibilities as a named Plaintiff, I have worked closely with Lead Counsel regarding the litigation and resolution of this case.

5. Throughout the litigation, I received status reports from Lead Counsel on case developments, and communicated with Lead Counsel concerning the Action and potential settlement. In particular, I: (a) produced my trading records to Lead Counsel; (b) regularly communicated with Lead Counsel regarding the posture and progress of the case; (c) looked over significant pleadings and briefs filed in this Action; (d) discussed the Court’s Orders with Lead Counsel; (e) provided documents, and written responses and objections, to Defendants’ requests for the production of documents; (f) responded to interrogatories; (g) prepared for my deposition

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

and was deposed; (h) moved for class certification and to serve as a class representative; (i) consulted with Lead Counsel regarding the settlement negotiations; and (j) evaluated and approved the proposed Settlement

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. PLAINTIFF'S LITIGATION-RELATED COSTS AND EXPENSES

7. I understand that reimbursement of a class representative's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

8. I am an digital media marketing specialist, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent at my job, investing, or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$10,000 for the time I devoted to participating in this Action. I make this request based on the conservative estimate that I devoted approximately 50 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

III. CONCLUSION

9. In conclusion, I respectfully request that the Court grant my request for reimbursement of the reasonable costs and expenses incurred in prosecuting the Action on behalf of the Settlement Class.

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

Executed on May ____, 2026..

Signed by:



Jennifer Ortiz

D32816974D4C44D...

EXHIBIT 5

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

DECLARATION OF NAMED PLAINTIFF RAYMOND OCHS

I, Raymond Ochs, declare as follows:

1. I am a named Plaintiff in the above-captioned securities class action (the “Action”).¹ See unnumbered docket entry dated August 29, 2025. I respectfully submit this declaration in support of: (a) Plaintiffs’ motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation; and (b) Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses, including approval of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein.

I. INVOLVEMENT/OVERSIGHT OF THE LITIGATION

3. My spouse, Richard O’Keefe-Jones, was named as an additional Plaintiff in the Amended Class Action Complaint for Violations of the Federal Securities Laws. ECF No. 35. In January 15, 2025, Plaintiffs filed a notice of Richard’s death. ECF No. 142. As Richard’s surviving and sole beneficiary, Plaintiffs moved for me to replace Richard as a Plaintiff in this litigation. ECF No. 163. On August 29, 2025, the Court granted Plaintiffs’ motion. See unnumbered docket entry dated August 29, 2025.

4. In fulfillment of our responsibilities as a named Plaintiff, Richard and I worked closely with Lead Counsel regarding the litigation and resolution of this case.

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

5. Throughout the litigation, Richard, and then I, received status reports from Lead Counsel on case developments, and communicated with Lead Counsel concerning the Action and potential settlement. In particular, Richard: (a) produced his trading records to Lead Counsel; (b) regularly communicated with Lead Counsel regarding the posture and progress of the case; (c) reviewed significant pleadings and briefs filed in this Action; (d) reviewed the Court's orders and discussed them with Lead Counsel; (e) provided documents, and written responses and objections, to Defendants' requests for the production of documents; (f) responded to interrogatories; (g) and prepared for his deposition and was deposed. Following my appointment as a Plaintiff in the Action, I: (a) worked with Lead Counsel to get up to speed on the litigation; (b) consulted with Lead Counsel regarding settlement negotiations and the mediation; and (c) evaluated and approved the proposed Settlement.

6. In short, Richard and I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. APPROVAL OF THE SETTLEMENT

7. Based on Richard's and my involvement in the prosecution and resolution of the claims asserted in the Action, I believe that the proposed Settlement provides a fair, reasonable, and adequate recovery for the Settlement Class, particularly in light of the risks of continued litigation, and I fully endorse approval of the Settlement by the Court.

III. LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

A. Attorneys' Fees And Litigation Expenses

8. I believe Lead Counsel's request for an award of attorneys' fees in the amount of 33 $\frac{1}{3}$ % of the Settlement Fund is fair and reasonable in light of the work Lead Counsel performed on behalf of the Settlement Class.

9. I have evaluated Lead Counsel's fee request by considering the quality and amount of the work performed, the recovery obtained for the Settlement Class, and the risks Lead Counsel bore in prosecuting this Action on behalf of myself, the other Plaintiffs, and the Settlement Class on a fully contingent basis, which included the fronting of all expenses. I have authorized this fee request for the Court's ultimate determination.

10. I further believe the litigation expenses for which Lead Counsel has requested reimbursement are reasonable. Based on the foregoing, and consistent with my obligation to the Settlement Class to obtain the best result at the most efficient cost, I fully support Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

B. Plaintiff's Litigation-Related Costs And Expenses

11. I understand that reimbursement of a class representative's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

12. Richard was a flight attendant, and the time he devoted to representing the Settlement Class in this Action was time that he otherwise would have spent at his job, investing, or on other activities and, thus, represented a cost to him.

13. I am retired and I previously served as Vice President of Customer Experiences at a technology company. The time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent investing or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$10,000 for the time Richard and I devoted to participating in this Action. I make this request based on the conservative effort that

Richard and I devoted approximately 80 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort Richard and I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

IV. CONCLUSION

14. In conclusion, I strongly endorse the Settlement as fair, reasonable, and adequate. I appreciate the Court’s attention to the facts presented in my declaration and respectfully request that the Court grant: (a) Plaintiffs’ motion for final approval of the proposed Settlement and the Plan of Allocation; (b) Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses; and (c) my request for reimbursement of the reasonable costs and expenses Richard and I incurred in prosecuting the Action on behalf of the Settlement Class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on May 20, 2026 in Seattle, Washington.
raymondochs99@gmail.com

Raymond Ochs

Raymond Ochs

EXHIBIT 6

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

DECLARATION OF NAMED PLAINTIFF HESHAM IBRAHIM

I, Hesham Ibrahim, declare as follows:

1. I am a named Plaintiff in the above-captioned securities class action (the “Action”).¹ See ECF No. 69. I respectfully submit this declaration in support of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein.

I. OVERSIGHT OF THE LITIGATION

3. I have been actively involved in this Action since I was named as an additional Plaintiff in Plaintiffs’ Second Amended Complaint (“SAC”), which was filed on February 9, 2023. ECF No. 69.

4. In fulfillment of my responsibilities as a named Plaintiff, I have worked closely with Lead Counsel regarding the litigation and resolution of this case.

5. Since the filing of the SAC, I have received status reports from Lead Counsel on case developments, and communicated with Lead Counsel concerning the Action and potential settlement. In particular, I: (a) produced my trading records to Lead Counsel (I also conducted an additional comprehensive search for additional trading records later in the Action); (b) regularly communicated with Lead Counsel regarding the posture and progress of the case; (c) reviewed significant pleadings and briefs filed in this Action; (d) reviewed the Court’s orders and discussed them with Lead Counsel; (e) provided documents, and written responses and objections, to

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

Defendants' requests for the production of documents; (f) responded to interrogatories; (g) prepared for my deposition and was deposed; (h) moved for class certification and to serve as a class representative; (i) consulted with Lead Counsel regarding the settlement negotiations; and (j) evaluated and approved the proposed Settlement

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. PLAINTIFF'S LITIGATION-RELATED COSTS AND EXPENSES

7. I understand that reimbursement of a class representative's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

8. I am an entertainer, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent at my job, investing, or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$10,000 for the time I devoted to participating in this Action. I make this request based on the conservative effort that I devoted approximately 100 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

III. CONCLUSION

9. In conclusion, I appreciate the Court's attention to the facts presented in my declaration and respectfully request that the Court grant my request for reimbursement of the reasonable costs and expenses incurred in prosecuting the Action on behalf of the Settlement Class.

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

Executed on May 13, 2026, in Cathedral City, California.



Hesham Ibrahim

EXHIBIT 7

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

DECLARATION OF NAMED PLAINTIFF MONTGOMERY BRANTLEY

I, Montgomery Brantley, declare as follows:

1. I am a named Plaintiff in the above-captioned securities class action (the “Action”).¹ See ECF Nos. 121, 128. I respectfully submit this declaration in support of: (a) Plaintiffs’ motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation; and (b) Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses, including approval of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein, as I have been directly involved in monitoring and overseeing the prosecution of the Action, as well as the negotiations leading to the Settlement, and I could and would testify competently to these matters.

I. OVERSIGHT OF THE LITIGATION

3. I have been actively involved in this Action since I was named as an additional Plaintiff in Plaintiffs’ Third Amended Complaint (“TAC”), which was filed on August 21, 2024. ECF No. 128.

4. In fulfillment of my responsibilities as a named Plaintiff, I have worked closely with Lead Counsel regarding the litigation and resolution of this case.

5. Since the filing of the TAC, I have received status reports from Lead Counsel on case developments, and communicated with Lead Counsel concerning the Action and potential

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

settlement. In particular, I: (a) produced my trading records to Lead Counsel; (b) regularly communicated with Lead Counsel regarding the posture and progress of the case; (c) reviewed significant pleadings and briefs filed in this Action; (d) reviewed the Court's orders and discussed them with Lead Counsel; (e) provided documents, and written responses and objections, to Defendants' requests for the production of documents; (f) responded to interrogatories; (g) prepared for my deposition and was deposed; (h) moved for class certification and to serve as a class representative; (i) consulted with Lead Counsel regarding the settlement negotiations; and (j) evaluated and approved the proposed Settlement

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. APPROVAL OF THE SETTLEMENT

7. As detailed in the paragraphs above, through my active participation I was both well-informed of the status and progress of the litigation, and the status and progress of the settlement negotiations in this Action.

8. Based on my involvement in the prosecution and resolution of the claims asserted in the Action, I believe that the proposed Settlement provides a fair, reasonable, and adequate recovery for the Settlement Class, particularly in light of the risks of continued litigation, and I fully endorse approval of the Settlement by the Court.

III. LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

A. Attorneys' Fees And Litigation Expenses

9. I believe Lead Counsel's request for an award of attorneys' fees in the amount of 33 $\frac{1}{3}$ % of the Settlement Fund is fair and reasonable in light of the work Lead Counsel performed on behalf of the Settlement Class.

10. I have evaluated Lead Counsel's fee request by considering the quality and amount of the work performed, the recovery obtained for the Settlement Class, and the risks Lead Counsel bore in prosecuting this Action on behalf of myself, the other Plaintiffs, and the Settlement Class on a fully contingent basis, which included the fronting of all expenses. I have authorized this fee request for the Court's ultimate determination.

11. I further believe the litigation expenses for which Lead Counsel has requested reimbursement are reasonable. Based on the foregoing, and consistent with my obligation to the Settlement Class to obtain the best result at the most efficient cost, I fully support Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

B. Plaintiff's Litigation-Related Costs And Expenses

12. I understand that reimbursement of a class representative's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

13. I am a Senior Manager, Property Tax, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent at my job, investing, or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$10,000 for the time I devoted to participating in this Action. I make this request based on the conservative effort that I devoted approximately 18 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

IV. CONCLUSION

14. In conclusion, I strongly endorse the Settlement as fair, reasonable, and adequate. I appreciate the Court's attention to the facts presented in my declaration and respectfully request that the Court grant: (a) Plaintiffs' motion for final approval of the proposed Settlement and the Plan of Allocation; (b) Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses; and (c) my request for reimbursement of the reasonable costs and expenses incurred in prosecuting the Action on behalf of the Settlement Class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on May 13th, 2026, in Flower Mound, Texas.

Montgomery E Brantley

Montgomery Brantley

EXHIBIT 8

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

**DECLARATION OF LEAD PLAINTIFF ROBERT SCHEELE IN SUPPORT OF LEAD
COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION EXPENSES**

I, Robert Scheele, declare as follows:

1. I am one of the Court-appointed Lead Plaintiffs in the above-captioned securities class action (the “Action”).¹ ECF No. 22. I respectfully submit this declaration in support of: (a) Plaintiffs’ motion for final approval of the proposed Settlement and approval of the proposed Plan of Allocation; and (b) Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses, including approval of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein, as I have been directly involved in monitoring and overseeing the prosecution of the Action, as well as the negotiations leading to the Settlement, and I could and would testify competently to these matters.

I. LEAD PLAINTIFF’S OVERSIGHT OF THE LITIGATION

3. By Order dated September 17, 2021, the Court: (a) appointed me to serve as one of the Lead Plaintiffs in the Action; and (b) approved my selection of Glancy Prongay & Murray LLP (n/k/a Glancy Prongay Wolke & Rotter LLP) and The Rosen Law Firm, P.A. (collectively, “Lead Counsel”) to serve as lead counsel. ECF No. 22.

4. In fulfillment of my responsibilities as a Lead Plaintiff, I worked closely with Lead Counsel regarding the litigation of this case until the Court dismissed my claims in conjunction with its August 8, 2023 ruling on Defendants’ motion to dismiss the Second Amended Complaint

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

(ECF No. 90), and December 19, 2023 denial of Plaintiffs' Motion for Reconsideration, Certification for Interlocutory Appeal, and/or Entry of Final Judgment. ECF No. 98.

5. Throughout the time I actively participated in the litigation, I received status reports from Lead Counsel on case developments, and participated in regular discussions concerning the prosecution of the Action, the strengths of and risks to the claims, and potential settlement. In particular, I: (a) produced my trading records to Lead Counsel; (b) moved to be appointed as one of the Lead Plaintiffs in this Action; (c) regularly communicated with my attorneys regarding the posture and progress of the case; (d) reviewed all significant pleadings and briefs filed in this Action; and (e) reviewed the Court's orders and discussed them with my attorneys.

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. LEAD PLAINTIFF'S LITIGATION-RELATED COSTS AND EXPENSES

7. I understand that reimbursement of a class representative's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

8. I am a IT Manager, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent at my job, investing, or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$7,500 for the time I devoted to participating in this Action. I make this request based on the conservative effort that I devoted approximately 75 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort

I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

III. CONCLUSION

9. In conclusion, I appreciate the Court’s attention to the facts presented in my declaration and respectfully request that the Court grant my request for reimbursement of the reasonable costs and expenses incurred in prosecuting the Action on behalf of the Settlement Class.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on May 26, 2026, in Schaumburg, IL.

Robert Scheele

Robert Scheele

EXHIBIT 9

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

DECLARATION OF LEAD PLAINTIFF MARK KUSNIER

I, Mark Kusnier, declare as follows:

1. I am one of the Court-appointed Lead Plaintiffs in the above-captioned securities class action (the “Action”).¹ ECF No. 22. I respectfully submit this declaration in support of my request to recover the reasonable costs and expenses I incurred in connection with my representation of the Settlement Class in the prosecution of this Action.

2. I am aware of and understand the requirements and responsibilities of a representative plaintiff in a securities class action, including those set forth in the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. I have personal knowledge of the matters set forth herein.

I. LEAD PLAINTIFF’S OVERSIGHT OF THE LITIGATION

3. By Order dated September 17, 2021, the Court: (a) appointed me to serve as one of the Lead Plaintiffs in the Action; and (b) approved my selection of Glancy Prongay & Murray LLP (n/k/a Glancy Prongay Wolke & Rotter LLP) and The Rosen Law Firm, P.A. (collectively, “Lead Counsel”) to serve as lead counsel. ECF No. 22.

4. In fulfillment of my responsibilities as a Lead Plaintiff, I worked closely with Lead Counsel regarding the litigation of this case until the Court dismissed my claims in conjunction with its August 8, 2023 ruling on Defendants’ motion to dismiss the Second Amended Complaint (ECF No. 90), and December 19, 2023 denial of Plaintiffs’ Motion for Reconsideration, Certification for Interlocutory Appeal, and/or Entry of Final Judgment. ECF No. 98.

5. Throughout the time I actively participated in the litigation, I received status reports from Lead Counsel on case developments, and participated in regular discussions concerning the prosecution of the Action, the strengths of and risks to the claims, and potential settlement. In

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

particular, I: (a) produced my trading records to Lead Counsel; (b) moved to be appointed as one of the Lead Plaintiffs in this Action; (c) regularly communicated with my attorneys regarding the posture and progress of the case; and (d) consulted with Lead Counsel regarding settlement negotiations and the mediation.

6. In short, I have done my best to vigorously promote the interests of the Settlement Class and to obtain the largest recovery possible under the circumstances.

II. LEAD PLAINTIFF'S LITIGATION-RELATED COSTS AND EXPENSES

7. I understand that reimbursement of a class representative's reasonable costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, I respectfully request reimbursement for the costs and expenses that I incurred directly relating to my representation of the Settlement Class in the Action.

8. I own and run my own business, and the time I devoted to representing the Settlement Class in this Action was time that I otherwise would have spent running my business, investing, or on other activities and, thus, represented a cost to me. I respectfully request reimbursement in the amount of \$7,500 for the time I devoted to participating in this Action. I make this request based on the conservative estimate that I devoted approximately 20 hours in the litigation-related activities described above. It is my belief that this request for reimbursement is fair and reasonable and that the time and effort I devoted to this litigation was necessary to help achieve an excellent result for the Settlement Class under the circumstances.

III. CONCLUSION

9. In conclusion, I appreciate the Court's attention to the facts presented in my declaration and respectfully request that the Court grant my request for reimbursement of the reasonable costs and expenses incurred in prosecuting the Action on behalf of the Settlement Class.

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

Executed on May ____, 2026.

DocuSigned by:
Mark Kusnier
Mark Kusnier C4352A32502F44E...

EXHIBIT 10

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Bernstein Litowitz Berger & Grossman LLP	Allegheny County Employees Retirement System v. Energy Transfer LP et al., No. 2:20-cv-00200-GAM	(E.D. Pa.) (Sep. 2025) (ECF No. 280)	Senior Counsel: \$825 - \$1,000 Associate: \$425 - \$800 Staff Attorney: \$410 - \$495 Financial Analyst: \$400 - \$700 Case Manager & Paralegal: \$325 - \$450	\$1,150 - \$1,700
	In re Silvergate Capital Corp. Sec. Litig., No. 3:22-cv-01936-JES-MSB	(S.D. Cal.) (Jul. 2025) (ECF No. 145-10)	Senior Counsel: \$1,000 Associate: \$425 - \$500 Financial Analyst: \$450 - \$700 Investigator: \$375 - \$650 Case Manager & Paralegal: \$350 - \$450	\$1,300 - \$1,700
	In re Qualcomm Incorporated Sec. Litig., No. 3:17-cv-00121-JO-MSB	(S.D. Cal.) (Aug. 2024) (ECF No. 441-5)	Senior Counsel: \$800 - \$875 Associate: \$425 - \$875 Senior Staff Attorney: \$425 - \$450 Staff Attorney: \$340 - \$425 Financial Analyst: \$335 - \$500 Case Manager & Paralegal: \$255 - \$425	\$800 - \$1,400
	In re James River Grp. Holdings, Ltd. Sec. Litig., No. 3:21-cv-00444-DJN	(E.D. Va.) (Apr. 2024) (ECF No. 126-7)	Senior Counsel: \$875 Associate: \$475 - \$700 Staff Attorney: \$425 - \$450 Financial Analyst: \$425 - \$675 Case Manager & Paralegal: \$325 - \$425	\$1,000 - \$1,350

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Boies, Schiller & Flexner LLP	Woodard v. Navient Solutions, LLC, et al., No. 8:23-cv-00301-RFR	(D. Neb.) (Nov. 2023) (ECF No. 13-4)	Counsel: \$850 - \$880 Associate: \$670 - \$710 Staff Attorney: \$430 Paralegal: \$380	\$920 - \$1,290
	Doe 1 v. Deutsche Bank Aktiengesellschaft et al., No. 1:22-cv-10018-JSR	(S.D.N.Y.) (Sep. 2023) (ECF No. 106)	Counsel: \$940 Associate: \$670 - \$860 Staff Attorney: \$430 - \$500 Paralegal: \$350 Managing Clerk: \$380	\$1,080 - \$2,110
	In re Grupo Televisa Sec. Litig., No. 1:18-cv- 01979	(S.D.N.Y.) (Jul. 2023) (ECF No. 356)	Counsel: \$940 - \$970 Associate: \$670 - \$830 Summer Associate: \$450 Staff Attorney: \$380 - \$460 Paralegal: \$350	\$1,140 - \$2,110
Cohen Milstein Sellers & Toll, PLLC	In re Silvergate Capital Corp. Sec. Litig., No. 3:22-cv-01936-JES-MSB	(S.D. Cal.) (Jul. 2025) (ECF No. 145-11)	Of Counsel: \$1,005 Associate: \$680 Law Clerk: \$395 Investigator: \$715 Paralegal: \$395	\$895 - \$1,495
	City of Birmingham Firemen's and Policemen's Supplemental Pension System v. Pluralsight, Inc., No. 1:19-cv-00128	(D. Utah) (Jan. 2025) (ECF No. 287-6)	Of Counsel: \$875 - \$1,015 Associate: \$495 - \$755 Staff Attorney: \$620 Law Clerk: \$385 - \$395 Paralegal: \$325 - \$420	\$810 - \$1,320

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Cohen Milstein Sellers & Toll, PLLC	Iowa Public Employees' Retirement System et al v Bank of America Corp et al., No. 1:17-cv-06221-KPF-SLC	(S.D.N.Y.) (May 2024) (ECF No. 674-1)	Of Counsel: \$790 Associate: \$495 - \$600 Staff Attorney: \$485 - \$700 Discovery Attorney: \$250 - \$495 Paralegal: \$290 - \$380	\$630 - \$1,320
Hausfeld LLP	Pannozi v. Deloitte Consulting LLP, No. 1:24-00524-MRD-LDA	(D.R.I.) (Dec. 2025) (ECF No. 34-2)	Of Counsel: \$750 - \$900 Associate: \$470 - \$520 Paralegal: \$370	\$1,025
	In re Broiler Chicken Grower Antitrust Litig. (No. II), No. 6:20-md-02977	(E.D.Okla.) (Nov. 2024) (ECF No. 628-1)	Associate: \$260 - \$650 Staff Attorney: \$460 - \$500 Paralegal: \$350 Law Clerk: \$260	\$830 - \$1,550
	OpenGov, Inc. v. GTY Technology Holdings Inc. et al., No. 3:18-cv-07198-JSC	(N.D. Cal.) (Mar. 2019) (ECF No. 40-1)	Of Counsel: \$775 - \$1,075 Paralegal: \$250 - \$290	\$700 - \$1,500
Labaton Sucharow LLP	In re Opendoor Technologies Inc. Sec. Litig., No. 2:22-cv-01717-MTL	(D. Ariz.) (Dec. 2025) (ECF No. 159-6)	Of Counsel: \$750 - \$975 Associate: \$350 - \$650 Staff Attorney: \$390 - \$475 Law Clerk: \$300 Investigator: \$475 - \$650 Paralegal: \$225 - \$415	\$800 - \$1,375

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Labaton Sucharow LLP	In re Barclays PLC Sec. Litig., No. 1:22-cv-08172	(S.D.N.Y.) (Feb. 2025) (ECF No. 103-4)	Of Counsel: \$750 - \$975 Associate: \$350 - \$675 Staff Attorney: \$400 - \$475 Paralegal: \$375 - \$415	\$1,110 - \$1,375
	Chen v. Missfresh Ltd. et al., No. 1:22-cv-09836-JSR	(S.D.N.Y.) (Sep. 2024) (ECF No. 149-9)	Of Counsel: \$600 - \$1,000 Associate: \$450 - \$625 Staff Attorney: \$340 - \$475 Law Clerk: \$275 - \$300 Paralegal: \$200 - \$435	
Levi & Korsinsky LLP	Lokman v. Azure Power Global Ltd. et al., No. 1:22-cv-07432-GHW	(S.D.N.Y.) (Aug. 2025) (ECF No. 129-3)	Of Counsel: \$850 Senior Associate: \$750 Associate: \$550 - \$575 Staff Attorney: \$475 Contract Attorney: \$475 Analyst: \$350 Paralegal: \$325 - \$350	\$975 - \$1,100
	In re Grab Holdings Ltd. Sec. Litig., No. 1:22-cv-02189-JLR	(S.D.N.Y.) (Apr. 2025) (ECF No. 151-5)	Of Counsel: \$850 Senior Associate: \$750 Associate: \$500 - \$575 Staff Attorney: \$475 Document Review Attorney: \$475 Law Clerk: \$375 Paralegal: \$350	

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Lieff Cabraser Heimann & Bernstein, LLP	Katz-Lacabe, et al. v. Oracle America, Inc., No. 3:22-cv-04792-RS	(N.D. Cal.) (Aug. 2024) (ECF No. 136-2)	Associate: \$530 - \$720 Staff Attorney: \$525 Litigation Support Specialist: \$535 Paralegal: \$510	\$1,015 - \$1,380
Motley Rice LLC	Leventhal v. Chegg, Inc., et al, No. 5:21-cv-09953-PCP	(N.D. Cal.) (Feb. 2025) (ECF No. 195-4)	Associate: \$660 - \$1,150 Law Clerk: \$325 - \$400 Paralegal: \$275 - \$425	\$1,150 - \$1,500 ("Member" Rates)
	In re Qualcomm Incorporated Sec. Litig., No. 3:17-cv-00121-JO-MSB	(S.D. Cal.) (Aug. 2024) (ECF No. 441-6)	Senior Counsel: \$860 - \$1,150 Of Counsel: \$1,150 Associate: \$550 - \$725 Contract Attorney: \$325 - \$470 Paralegal: \$275 - \$425	\$950 - \$1,300 ("Member" Rates)
	In re Grab Holdings Ltd. Sec. Litig., No. 1:22-cv-02189-JLR	(S.D.N.Y.) (Apr. 2025) (ECF No. 151-4)	Of Counsel: \$800 Associate: \$550 - \$750 Staff Attorney: \$535 - \$725 Project Associate: \$495 - \$530 Paralegal: \$375	\$1,050 - \$1,375
	In re Emergent BioSolutions, Inc. Sec. Litig., No. 8:21-cv-00955-DLB	(D. Md.) (Feb. 2025) (ECF No. 194-2)	Of Counsel: \$850 Associate: \$600 - \$750 Staff Attorney: \$565 Project Associate: \$465 - \$530 Paralegal: \$110 - \$375	\$950 - \$1,375

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Quinn Emanuel Urquhart & Sullivan, LLP	Chemimage Corp. v. Johnson & Johnson and Ethicon, Inc., No. 1:24-cv-02646-JMF	(S.D.N.Y.) (Jul. 2025) (ECF No. 216)	Counsel: \$1,570 - \$1,775 Associate: \$1,060 - \$1,560 Law Clerk: \$710 Managing Clerk: \$620 - \$680 Attorney: \$545 - \$640 Paralegal: \$550 - \$655	\$1,645 - \$2,700
	Iowa Public Employees' Retirement System et al v Bank of America Corp et al., No. 1:17-cv-06221-KPF-SLC	(S.D.N.Y.) (May 2024) (ECF No. 673-1)	Of Counsel: \$1,170 - \$1,570 Attorney: \$580 - \$1,515 Paralegal: \$320 - \$550 Lit. Support: \$190 - \$270	\$1,645 - \$2,410
Robbins Geller Rudman & Dowd LLP	County of York Retirement Fund v. HP Inc., et al., No. 4:20-cv-07835-JSW	(N.D. Cal.) (Dec. 2025) (ECF No. 114-1)	Of Counsel: \$1,045 Associate: \$280 - \$520 Research Analyst: \$335 Paralegal: \$350 - \$435	\$830 - \$1,480
	In re Alta Mesa Resources, Inc. Sec. Litig., No. 4:19-cv-00957	(S.D. Tex.) (Mar. 2025) (ECF No. 1024-5)	Of Counsel: \$460 - \$1,200 Associate: \$250 - \$700 Staff Attorney: \$475 - \$485 Economic Analyst: \$315 - \$485	\$835 - \$1,400
	In re Apple Inc. Sec. Litig., No. 4:19-cv-02033-YGR	(N.D. Cal.) (Jul. 2024) (ECF No. 438-1)	Of Counsel: \$535 - \$1,135 Associate: \$465 - \$540 Staff Attorney: \$460 - \$475 Economic Analyst: \$370 - \$470 Paralegal: \$325 - \$410	\$755 - \$1,400

Plaintiffs' Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Scott+Scott, Attorneys at Law, LLP	In re Alphabet, Inc., Shareholder Deriv. Litig., No. 3:21-cv-09388-RFL	(N.D. Cal.) (Aug. 2025) (ECF No. 108-4)	Of Counsel: \$875 - \$2,050 Associate: \$675 - \$875 Staff Attorney: \$525 - \$720 Paralegal: \$435	\$895 - \$1,900
	In re Oatly Grp. AB Sec. Litig., No. 1:21-cv-06360-AKH	(S.D.N.Y.) (Jun. 2024) (ECF No. 115-2)	Associate: \$665 - \$850 Investigator: \$550 - \$675 Research Analyst: \$435 Paralegal: \$415 - \$435	\$795 - \$1,900
	Abadilla, et al. v. Precigen, Inc. et al., No. 5:20-cv-06936-BLF	(N.D. Cal.) (Sep. 2023) (ECF No. 138)	Of Counsel: \$1,050 Associate: \$625 - \$795 Staff Attorney: \$675 Paralegal: \$395 - \$415	\$1,095 - \$1,595

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Akin Gump Strauss Hauer & Feld LLP	In re Steward Health Care System LLC, et al., Debtors, No. 24-90213 (CML)	(Bankr. S.D. Tex.) (Aug 2025) (ECF No. 5924)	Senior Counsel and Counsel: \$1,560 - \$1,900 Associate and Practice Attorney: \$995 - \$1,195 Paraprofessional: \$555	\$2,100 - \$2,495
	In re NV Texas, LLC, Debtor, No. 24-90576 (ARP)	(Bankr. S.D. Tex.) (May 2025) (ECF No. 6)	Senior Counsel and Counsel: \$1,405 - \$1,800 Associate: \$895 - \$1,310 Paraprofessional: \$395 - \$555	\$2,250 - \$2,495
	In re Covington Credit of Texas, Inc., Reorganized Debtor, No. 24-90164 (MI)	(Bankr. S.D. Tex.) (Aug. 2024) (ECF No. 16)	Senior Counsel and Counsel: \$1,250 - \$1,650 Associate: \$840 - \$1,200 Paraprofessional: \$305 - \$530	\$1,775 - \$2,195
Allen Overy Shearman Sterling US LLP	In re SWC Industries LLC et al., Debtors, No. 24-51721-MEH	(Bankr. N.D. Cal.) (Jun. 2025) (ECF No. 702)	Counsel: \$1,615 - \$1,715 Associate: \$825 - \$1,485 Law Clerk: \$825 Paralegal: \$430 - \$565	\$1,595 - \$2,285
	In re Amyris, Inc., et al., Reorganized Debtors, No. 23-11131 (TMH)	(Bankr. D. Del.) (Jun. 2024) (ECF No. 1558)	Counsel: \$1,425 - \$1,555 Associate: \$775 - \$1,415 Legal Assistant: \$375 - \$525	\$1,460 - \$2,130
	In re Venus Liquidation Inc., et al., Debtors, No. 23-10738 (JPM)	(Bankr. S.D.N.Y.) (Jan. 2024) (ECF No. 727)	Counsel: \$1,300 Associate: \$1,215 - \$1,415 Law Clerk: \$225 - \$995	\$1,975 - \$2,130
Cleary Gottlieb Steen & Hamilton LLP	In re ViewRay, Inc., et al., Debtors, No. 23-10935 (KBO)	(Bankr. D. Del.) (Nov. 2023) (ECF No. 428-2)	Associate: \$965 - \$1,105 Paralegal: \$430 Non-Legal: \$370	\$1,305 - \$1,930

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Cooley LLP	In re Clearside Biomedical, Inc., Debtor, No. 25-12109 (TMH)	(Bankr. D. Del.) (Feb. 2026) (ECF No. 221)	Of Counsel: \$1,695 - \$2,275 Special Counsel: \$1,500 - \$1,625 Associate: \$830 - \$1,525 Paralegal: \$460 - \$505	\$1,590 - \$2,305
	In re Lutheran Home and Services for the Aged, Inc., et al., Debtors, No. 25-01705	(Bankr. N.D. Ill.) (Mar. 2025) (ECF No. 205)	Associate: \$830 - \$1,500 Paralegal: \$460	\$1,710
	In re CR Holding Liquidating, Inc., et al., Debtors, No. 19-10210-LSS	(Bankr. D. Del.) (May 2023) (ECF No. 1820)	Senior Counsel: \$1,650 Associate: \$1,235 - \$1,245 Law Clerk: \$670 Paralegal: \$380 - \$605	\$1,285 - \$1,895
Davis Polk & Wardwell LLP	In re Spirit Aviation Holdings, Inc., et al., Debtors, No. 25-11897 (SHL)	(Bankr. S.D.N.Y.) (Oct. 2025) (ECF No. 196)	Counsel: \$1,790 - \$2,040 Associate: \$730 - \$1,780 Paraprofessional: \$505 - \$715	\$2,140 - \$2,645
	In re Azul S.A., et al., Debtors, No. 25-11176 (SHL)	(Bankr. S.D.N.Y.) (Jun. 2025) (ECF No. 117)	Counsel: \$1,790 - \$2,040 Associate: \$730 - \$1,780 Paraprofessional: \$505 - \$715	\$2,140 - \$2,645
	In re Spirit Finance Cayman 1 Ltd, Reorganized Debtors, No. 24-12038 (SHL)	(Bankr. S.D.N.Y.) (Apr. 2025) (ECF No. 6)	Counsel: \$1,725 - \$2,040 Associate: \$965 - \$1,780 Law Clerk: \$695 - \$1,065 Legal Assistant: \$505 - \$715	\$2,375 - \$2,645
Dechert LLP	In re Eletson Holdings Inc., et al., Debtors, No. 23-10322 (JPM)	(Bankr. S.D.N.Y.) (Dec. 2024) (ECF No. 1321)	Associate: \$830 - \$1,220 Staff Attorney: \$625 Legal Assistant: \$350 - \$525	\$1,425 - \$1,975

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Dechert LLP	In re Bintago Inc., et al., Debtors, No. 23-11394 (SHL)	(Bankr. S.D.N.Y.) (Feb. 2024) (ECF No. 433)	Counsel: \$1,105 - \$1,300 Associate: \$775 - \$1,140 Law Clerk: \$680 Legal Assistant: \$435 - \$525 E-Discovery Specialist: \$525	\$1,275 - \$1,825
DLA Piper LLP (US)	In re Hudson 1701/1706, LLC, et al., Debtors, No. 25-11853 (KBO)	(Bankr. D. Del.) (Nov. 2025) (ECF No. 99-2)	Of Counsel: \$1,420 - \$1,765 Associate: \$895 - \$1,585 Paralegal: \$455 - \$640	\$1,585 - \$2,350
	In re Azzur Group Holdings LLC, et al., Debtors, No. 25-10342 (KBO)	(Bankr. D. Del.) (Mar. 2025) (ECF No. 109-2)	Of Counsel: \$1,425 Associate: \$795 - \$1,305 Paraprofessional: \$575	\$1,585 - \$2,085
	In re Vestoo Ltd., et al., Debtors, No. 23-11160 (MFW)	(Bankr. D. Del.) (Jan. 2024) (ECF No. 619)	Associate: \$730 - \$1,215 Law School Graduate: \$730 Research Analyst: \$500 Paralegal: \$340 - \$475	\$1,215 - \$1,800
Freshfields Bruckhaus Deringer LLP	In re Molekule Grp., Inc. et al., Debtors, No. 23-18094-EPK	(Bankr. S.D. Fla.) (Jan. 2024) (ECF No. 392)	Associate: \$1,195	\$1,825 - \$2,125
	In re Talen Energy Supply, LLC, et al., Debtors, No. 22-90054 (MI)	(Bankr. S.D. Tex.) (Jun. 2023) (ECF No. 2114-2)	Counsel: \$1,425 Associate: \$980 - \$1,200	\$1,690 - \$1,945
	In re Revlon, Inc. et al., Debtors, No. 22-10760 (DSJ)	(Bankr. S.D.N.Y.) (Apr. 2023) (ECF No. 1835)	Counsel: \$843 Associate: \$321 - \$1,323 Paralegal/Non-Legal Staff: \$320 - \$525	\$1,057 - \$1,723
Gibson, Dunn & Crutcher LLP	In re Walker Edison Holdco LLC, et al., Debtors, No. 25-11602 (TMH)	(Bankr. D. Del.) (Sep. 2025) (ECF No. 191)	Associate and Of Counsel: \$905 - \$1,725 Paralegal: \$350 - \$800 Other Timekeeper: \$370 - \$695	\$1,840 - \$3,050

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Gibson, Dunn & Crutcher LLP	In re High Valley Investments, LLC, et al., Debtors, No. 23-11616 (TMH)	(Bankr. D. Del.) (Apr. 2024) (ECF No. 343)	Of Counsel: \$1,260 Associate: \$1,005 - \$1,060 Paralegal: \$705	\$1,530 - \$1,675
	In re Stimwave Tech. Inc., et al., Debtors, No. 22-10541 (TMH)	(Bankr. D. Del.) (May 2023) (ECF No. 901)	Associate: \$1,105 - \$1,210	\$1,860
Goodwin Procter LLP	In re iRobot Corporation, et al., Debtors, No. 25-12197 (BLS)	(Bankr. D. Del.) (Dec. 2025) (ECF No. 68)	Counsel: \$1,275 - \$2,475 Associate: \$995 - \$1,495 Paralegal: \$375 - \$815	\$1,475 - \$2,625
	In re Alachua Government Services, Inc., Debtor, No. 25-11289 (JKS)	(Bankr. D. Del.) (Aug. 2025) (ECF No. 148)	Of Counsel: \$1,170 - \$2,052 Associate: \$783 - \$1,233 Paralegal: \$342 - \$666	\$1,260 - \$2,205
	In re Old Mbria Inc., Debtor, No. 24-10952 (LSS)	(Bankr. D. Del.) (Aug. 2024) (ECF No. 289-1)	Counsel: \$1,260 - \$1,300 Associate: \$770 - \$1,270 Senior Paralegal: \$510 - \$620 Research Analyst: \$295 - \$660	\$1,300 - \$1,900
Greenberg Traurig LLP	In re Wellmade Floor Coverings Int'l, Inc., et al., Debtors, No. 25-58764	(Bankr. N.D. Ga.) (Aug. 2025) (ECF No. 102)	Of Counsel: \$550 - \$1,975 Associate: \$350 - \$1,220 Legal Assistant or Paralegal: \$140 - \$655	\$615 - \$2,250
	In re Steward Health Care System LLC, et al., Debtors, No. 24-90213 (CML)	(Bankr. S.D. Tex.) (Sep. 2024) (ECF 2565)	Of Counsel: \$875 Associate: \$875 Paralegal: \$515 J.D. Candidate: \$395	\$995 - \$1,670

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Greenberg Traurig LLP	In re Vesttoo Ltd., et al., Debtors, No. 23-11160 (MFW)	(Bankr. D. Del.) (Nov. 2023) (ECF No. 399)	Senior Counsel: \$1,645 Of Counsel: \$855 - \$900 Associate: \$650 - \$895 Paralegal: \$390 - \$475	\$880 - \$1,665
Hogan Lovells US LLP	In re Dtech Liquidating, Inc. et al., Debtors, No. 24-11378 (JTD)	(Bankr. D. Del.) (Jan. 2025) (ECF No. 453)	Senior Associate: \$1,190 Associate: \$785 Law Clerk: \$695 Senior Paralegal: \$600	\$1,485 - \$1,970
	In re Mallinckrodt PLC, et al., Debtors, No. 23-11258 (JTD)	(Bankr. D. Del.) (Dec. 2023) (ECF No. 744)	Senior Counsel: \$1,444 Of Counsel: \$1,135 - \$1,175 Senior Associate: \$1,065 - \$1,110 Associate: \$650 - \$890 Senior Research Analyst: \$390 Paralegal: \$390	\$885 - \$1,585
	In re LTL Management LLC, Debtor, No. 21-30589 (JCW)	(Bankr. D.N.J.) (May 2022) (ECF No. 2240-1)	Counsel: \$910 - \$1,735 Associate: \$605 - \$1,055 Paralegal: \$275 - \$550	\$950 - \$2,465
Jones Day	In re Flying Star LLC, et al., Debtors and Debtors-in-Possession, No. 25-bk-11380-WB	(Bankr. C.D. Cal.) (Sep. 2025) (ECF No. 162)	Associate: \$775 - \$825 Paralegal: \$450 - \$600	\$1,225 - \$1,800
	In re Meier's Wine Cellars Acquisition, LLC, et al., No. 24-11575 (MFW)	(Bankr. D. Del.) (Feb. 2025) (ECF No. 784)	Of Counsel: \$1,000 Associate: \$550 - \$1,175	\$1,150 - \$1,850

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Jones Day	In re LTL Mgmt. LLC, Debtor, No. 23-12825 (MBK)	(Bankr. D.N.J.) (Sep. 2023) (ECF No. 1327)	Of Counsel: \$925 - \$1,275 Associate: \$325 - \$925 Staff Attorney: \$600 - \$625 Paralegal: \$213 - \$500	\$563 - \$1,800
Katten Muchin Rosenman LLP	In re Vanderbilt Minerals, LLC, Debtor, No. 26-60110 (WAK)	(Bankr. N.D.N.Y.) (Mar. 2026) (ECF No. 117)	Of Counsel: \$1,220 - \$2,310 Associate: \$835 - \$1,315 Paralegal: \$350 - \$945	\$1,370 - \$2,645
	In re Genesis Healthcare, Inc., et al., Debtors, No. 25-80185 (SGJ)	(Bankr. N.D. Tex.) (Jul. 2025) (ECF No. 249)	Of Counsel: \$1,110 - \$2,100 Counsel and Special Staff: \$610 - \$1,615 Associate: \$715 - \$1,210 Paralegal: \$230 - \$860	\$1,205 - \$2,380
	In re 2U, Inc., et al., Reorganized Debtors, No. 24-11279 (MEW)	(Bankr. S.D.N.Y.) (Oct. 2024) (ECF No. 221)	Associate: \$700 - \$1,035 Paraprofessional: \$500	\$1,360 - \$1,920
	In re Capstone Green Energy Corp., et al., Debtors, No. 23-11634 (LSS)	(Bankr. D. Del.) (Dec. 2023) (ECF No. 148-2)	Of Counsel: \$735 - \$1,440 Counsel and Special Staff: \$460 - \$1,230 Associate: \$300 - \$935 Paralegal: \$90 - \$650	\$835 - \$1,795
King & Spalding LLP	In re Luminar Technologies, Inc., Debtors, No. 25-90807 (CML)	(Bankr. S.D. Tex.) (Jan. 2026) (ECF No. 200)	Counsel: \$945 - \$2,900 Associate: \$780 - \$2,060	\$1,520 - \$2,820
	In re Red River TALC LLC, Debtor, No. 24-90505 (CML)	(Bankr. S.D. Tex.) (Oct. 2024) (ECF No. 289)	Counsel: \$655 - \$2,000 Associate: \$540 - \$1,395 Paralegal: \$275 - \$675	\$1,005 - \$2,180

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
King & Spalding LLP	In re Red Lobster Mgmt. LLC, et al., Debtors, No. 6:24-bk-02486-GER	(Bankr. M.D. Fla.) (Aug. 2024) (ECF No. 926)	Counsel: \$1,365 - \$1,440 Associate: \$660 - \$1,515 Staff Attorney: \$315 - \$495 Project Attorney: \$165 - \$1,000 Paralegal: \$275 - \$675 Litigation Support: \$425	\$1,175 - \$1,920
Kirkland & Ellis, LLP	In re KLEOPATRA FINCO S.À R.L., et al., Debtors, No. 25-90642 (CML)	(Bankr. S.D. Tex.) (Dec. 2025) (ECF No. 196-1)	Of Counsel: \$875 - \$2,495 Associate: \$825 - \$1,775 Paraprofessional: \$385 - \$775	\$1,395 - \$2,975
	In re American Tire Distributors, Inc., et al., Debtors, No. 24-12391 (CTG)	(Bankr. D. Del.) (Dec. 2024) (ECF No. 568)	Associate: \$815 - \$1,395	\$1,575 - \$2,305
Latham & Watkins LLP	In re FAT BRANDS INC., et al., Debtors, No. 26-90126 (ARP)	(Bankr. S.D. Tex.) (Feb. 2026) (ECF No. 226-1)	Counsel: \$1,815 - \$2,550 Associate: \$945 - \$1,850 Professional Staff: \$280 - \$1,410 Paralegal: \$390 - \$970	\$1,895 - \$3,050
	In re Docudata Solutions, L.C., et al., Debtors, No. 25-90023 (CML)	(Bankr. S.D. Tex.) (Mar. 2025) (ECF No. 143-1)	Counsel: \$1,595 - \$2,070 Associate: \$835 - \$1,635 Professional Staff: \$255 - \$980 Paraprofessionals: \$355 - \$755	\$1,680 - \$2,650
	In re Purdue Pharma L.P., et al., Debtors, No. 19-23649 (RDD)	(Bankr. S.D.N.Y.) (May 2024) (ECF No. 6360)	Associate: \$890 - \$1,345	\$1,680 - \$2,035
	In re Sorrento Therapeutics Inc., et al., Post Effective Date Debtors, No. 23-90085 (CML)	(Bankr. S.D. Tex.) (May 2024) (ECF No. 2181)	Counsel: \$1,470 - \$1,605 Associate: \$760 - \$1,340 Financial Analyst: \$570 Paralegal: \$355 - \$525	\$1,495 - \$2,240

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Mayer Brown LLP	In re Ligado Networks LLC, et al., Debtors, No. 25-10006 (TMH)	(Bankr. D. Del.) (Feb. 2025) (ECF No. 181)	Counsel: \$1,080 - \$1,685 Associate: \$775 - \$1,320 Paralegal: \$255 - \$580	\$1,280 - \$2,870
McDermott Will & Emery LLP	In re Inspired Healthcare Capital Holdings, LLC, et al., Debtors, No. 26-90004 (MXM)	(Bankr. N.D. Tex.) (Mar. 2026) (ECF No. 238)	Associate: \$985 - \$1,645 Paraprofessional: \$440 - \$910	\$1,700 - \$2,740
	In re Wellpath Holdings, Inc., et al., Debtors, No. 24-90533 (ARP)	(Bankr. S.D. Tex.) (Jan. 2025) (ECF No. 1042)	Counsel: \$1,345 - \$1,600 Associate: \$805 - \$1,245 Paralegal: \$460 - \$745 Legal Assistant: \$540	\$1,290 - \$2,290
Milbank LLP	In re Saks Global Enterprises LLC, et al., Debtors, No. 26-90103 (ARP)	(Bankr. S.D. Tex.) (Feb. 2026) (ECF No. 884)	Counsel: \$1,995 - \$2,270 Associate: \$745 - \$1,820 Paraprofessional: \$410 - \$595	\$2,145 - \$2,725
	In re Edgio, Inc., et al., Debtors, No. 24-11985 (KBO)	(Bankr. D. Del.) (Feb. 2025) (ECF No. 734)	Of Counsel: \$1,795 Special Counsel: \$1,575 Associate: \$595 - \$1,475 Case Manager: \$480 Legal Assistant: \$430	\$1,695 - \$2,245
O'Melveny & Myers LLP	In re F-Star Socorro, L.P., et al., Debtors, No. 25-90607 (ARP)	(Bankr. S.D. Tex.) (Jan. 2026) (ECF No. 392)	Counsel: \$1,370 - \$1,525 Associate: \$825 - \$1,215 Atty Bar Applicant: \$825 Paralegal: \$435 Research Analyst: \$450	\$1,525 - \$2,100

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
O'Melveny & Myers LLP	In re Merit Street Media, Inc., Debtor, No. 25-80156 (SWE)	(Bankr. S.D. Tex.) (Aug. 2025) (ECF No. 228)	Counsel: \$1,295 - \$1,525 Associate: \$825 - \$1,215 Paraprofessional: \$250 - \$550	\$1,525 - \$2,400
	In re Millenkamp Cattle, Inc., Debtors, No. 24-40158-NGH	(Bankr. D. Idaho) (Aug. 2024) (ECF No. 585)	Counsel: \$1,265 Associate: \$860 - \$1,070 Paralegal: \$510 Summer Associate: \$370	\$1,385 - \$1,585
	In re Ebix, Inc., et al., Debtors, No. 23-80004-swe11	(Bankr. N.D. Tex.) (May 2024) (ECF No. 595)	Counsel: \$1,265 Associate: \$1,200	\$1,885
Paul, Weiss, Rifkind, Wharton & Garrison LLP	In re New Rite Aid, LLC, et al., Debtors, No. 25-14831-MBK	(Bankr. D.N.J.) (Jan. 2026) (ECF No. 74)	Counsel: \$1,995 Associate: \$975 - \$1,695 Paralegal: \$460 - \$560	\$2,245 - \$2,595
	In re Enviva Pellets Epes Holdings, LLC, Reorganized Debtor, No. 24-10454 (BFK)	(Bankr. E.D. Va.) (Jan. 2025) (ECF No. 20)	Counsel: \$1,995 Associate: \$975 - \$1,695 Staff Attorney: \$645 - \$675 Paralegal: \$375 - \$560	\$2,350 - \$2,595
Pillsbury Winthrop Shaw Pittman LLP	In re Partners Pharmacy Services, LLC, Debtors, No. 25-34698 (CML)	(Bankr. S.D. Tex.) (Aug. 2025) (ECF No. 49)	Counsel: \$1,275 Associate: \$795 - \$1,180 Paraprofessional: \$510	\$1,390 - \$1,690
Proskauer Rose LLP	In re Genesis Healthcare, Inc., et al., No. 25-80185 (SGJ)	(Bankr. N.D. Tex.) (Feb. 2026) (ECF No. 2313)	Senior Counsel: \$1,605 Associate: \$1,045 - \$1,780 Paraprofessional: \$320 - \$795	\$1,705 - \$2,505

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Proskauer Rose LLP	In re Zachry Holdings, Inc., et al., Debtors, No. 24-90377 (MI)	(Bankr. S.D. Tex.) (Jan. 2025) (ECF No. 1959)	Special Counsel: \$1,690 Associate: \$1,045 - \$1,560 Paralegal: \$485	\$1,705 - \$2,435
Quinn Emanuel Urquhart & Sullivan, LLP	In re Office Properties Income Trust, et al., No. 25-90530 (CML)	(Bankr. S.D. Tex.) (Nov. 2025) (ECF No. 205)	Counsel: \$1,775 - \$2,725 Associate: \$1,035 - \$1,665	\$1,860 - \$3,000
	In re Accuride Corp., et al., Debtors, No. 24-12289 (JKS)	(Bankr. D. Del.) (Jan. 2025) (ECF No. 535)	Counsel: \$1,570 Associate: \$1,060 - \$1,420 Litigation Support: \$190	\$1,645 - \$2,410
Ropes & Gray LLP	In re PS Holdings Wind Down, Inc., et al., Debtors, No. 25-11677 (KBO)	(Bankr. D. Del.) (Dec. 2025) (ECF No. 270)	Associate: \$900 Paralegal: \$625 - \$670	\$2,000
	In re Exactech, Inc., et al., Debtors, No. 24-12441 (LSS)	(Bankr. D. Del.) (Feb. 2025) (ECF No. 582)	Counsel: \$1,390 - \$1,580 Associate: \$830 - \$1,460 Trainee Solicitor: \$570 Senior Paralegal: \$575	\$1,700 - \$1,880
	In re VH Legacy/Liquidation, LLC, et al., Debtors, No. 22-11019 (LSS)	(Bankr. D. Del.) (May 2023) (ECF No. 417)	Associate: \$900 - \$1,310 Law Clerk: \$770 Paralegal: \$320 - \$565	\$1,520 - \$1,900
Sheppard, Mullin, Richter & Hampton LLP	In re Silvergate Capital Corp., et al., Debtors, No. 24-12158 (KBO)	(Bankr. D. Del.) (Jan. 2025) (ECF No. 455)	Special Counsel: \$865 - \$930 Associate: \$765 - \$930	\$990 - \$1,460
	In re Mariner Health Central, Inc., et al., Debtors, No. 22-41079	(Bankr. N.D. Cal.) (Apr. 2023) (ECF No. 522)	Associate: \$700 - \$945	\$1,355 - \$1,555

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Sidley Austin LLP	In re Merit Street Media, Inc., Debtor, No. 25-80156 (SWE)	(Bankr. S.D. Tex.) (Feb. 2026) (ECF No. 712-1)	Counsel: \$1,790 Senior Associate: \$1,505 - \$1,530 Managing Associate: \$1,265 - \$1,355 Associate: \$835 - \$1,140 Paralegal: \$540 - \$650 Research Analyst: \$335	\$1,790 - \$2,530
	In re Independence Contract Drilling, Inc., et al., Reorganized Debtors, No. 24-90612 (ARP)	(Bankr. S.D. Tex.) (Feb. 2025) (ECF No. 144)	Counsel: \$1,790 Senior Associate: \$1,485 - \$1,505 Managing Associate: \$1,230 - \$1,265 Associate: \$835 - \$1,140 Paralegal: \$600 - \$650 Research Analyst: \$305 - \$335	\$1,675 - \$2,040
Simpson Thacher & Bartlett LLP	In re Zynex, Inc. et al., Debtors, No. 25-90810 (ARP)	(Bankr. S.D. Tex.) (Jan. 2026) (ECF No. 172)	Senior Counsel: \$2,050 Counsel: \$1,995 Associate: \$895 - \$1,690 Paraprofessional: \$470 - \$725	\$2,220 - \$2,730
	In re WW International, Inc., et al., Debtors, No. 25-cv-10829 (CTG)	(Bankr. D. Del.) (May 2025) (ECF No. 81)	Senior Counsel: \$2,050 Counsel: \$1,995 Associate: \$895 - \$1,690 Paraprofessional: \$470 - \$725	\$2,220 - \$2,730
	In re Zymergen Inc., et al., Debtors, No. 23-11661 (KBO)	(Bankr. D. Del.) (Mar. 2024) (ECF No. 443)	Counsel: \$1,800 Associate: \$795 - \$1,415 Paralegal: \$600	\$2,165 - \$2,405

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Skadden, Arps, Slate, Meagher & Flom LLP	In re True Value Co., L.L.C., et al., Debtors, No. 24-12337 (KBO)	(Bankr. D. Del.) (Jun. 2025) (ECF No. 1311)	Of Counsel: \$1,238 - \$2,475 Counsel: \$1,795 Associate: \$813 - \$1,625 Law Clerk: \$745 Paraprofessional: \$650	\$1,995 - \$2,375
	In re True Value Co., L.L.C., et al., Debtors, No. 24-12337 (KBO)	(Bankr. D. Del.) (Feb. 2025) (ECF No. 923)	Of Counsel: \$1,105 Counsel: \$1,580 - \$1,800 Associate/Law Clerk: \$675 - \$1,510 Paraprofessional: \$325 - \$580	\$1,060 - \$2,120
	In re Armstrong Flooring, Inc., No. 22-bk-10426	(Bankr. D. Del.) (May 2022) (ECF No. 187)	Of Counsel: \$1,300 - \$1,495 Associate: \$550 - \$1,275	\$1,465 - \$1,980
	In re VIVUS, Inc. et al., Reorganized Debtors, No. 20-bk-11779 (LSS)	(Bankr. D. Del.) (Jan. 2021) (ECF No. 443)	Of Counsel: \$1,260 Associate: \$695 - \$1,120 ((\$495 for Associate Pending Admission))	\$1,425 - \$1,565
Sullivan & Cromwell LLP	In re KFI Wind-Down Corp., Debtor, No. 23-10638 (LSS)	(Bankr. D. Del.) (Jan. 2025) (ECF No. 1850)	Special Counsel: \$1,675 Associate: \$850 - \$1,575 Paralegal: \$450 - \$565	\$1,695 - \$2,375
	In re FTX Trading Ltd., et al., Debtors, No. 22-11068 (JTD)	(Bankr. D. Del.) (Aug. 2023) (ECF No. 2271)	Of Counsel: \$2,165 Special Counsel: \$1,575 - \$1,825 Associate: \$775 - \$1,475 Law Clerk: \$550 Paralegal: \$425 - \$595 Legal Analyst: \$595	\$1,595 - \$2,165

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Vinson & Elkins LLP	In re DSI WINDDOWN, INC., et al., Debtors, No. 25-10518 (MFW)	(Bankr. D. Del.) (Sep. 2025) (ECF No. 555)	Counsel: \$1,550 - \$1,995 Associate: \$910 - \$1,400	\$2,125 - \$2,250
	In re Kidkraft, Inc., et al., Debtors, No. 24-80045mv111	(Bankr. N.D. Tex.) (Aug. 2024) (ECF No. 340)	Counsel: \$1,550 - \$1,810 Associate: \$910 - \$1,400 Paralegal: \$615 - \$650 eDiscovery Analyst: \$495	\$1,810 - \$2,250
	In re Core Scientific, Inc., et al., Debtors, No. 22-90341 (DRJ)	(Bankr. S.D. Tex.) (Sep. 2023) (ECF No. 1251)	Counsel: \$1,590 Associate: \$730 - \$1,220 Paralegal: \$420	\$1,425 - \$1,920
Weil, Gotshal & Manges LLP	In re Valves and Controls US, Inc., Debtor, No. 25-11403 (TMH)	(Bankr. D. Del.) (Jan. 2026) (ECF No. 249)	Counsel: \$1,725 Associate: \$1,070 - \$1,560 Paralegal: \$375 - \$630 Litigation Support: \$490	\$2,050 - \$2,395
	In re AIO US, Inc., et al., Debtors, No. 24-11836 (CTG)	(Bankr. D. Del.) (Feb. 2025) (ECF No. 786)	Counsel: \$1,595 - \$1,760 Associate: \$850 - \$1,485 Paralegal: \$350 - \$595 Litigation Support: \$510	\$1,750 - \$2,350
Willkie Farr & Gallagher LLP	In re Saks Global Enterprises LLC, et al., Debtors, No. 26-90103 (ARP)	(Bankr. S.D. Tex.) (Jan. 2026) (ECF No. 466)	Associate: \$1,150 - \$1,850 Law Clerk: \$925 Paraprofessional: \$485 - \$650	\$2,075 - \$2,795
	In re Vertex Energy, Inc., et al., Debtors, No. 24-90507 (CML)	(Bankr. S.D. Tex.) (Jan. 2025) (ECF No. 627-2)	Associate: \$1,325 - \$1,625 Law Clerk: \$625 Senior Paralegal: \$590 Paralegal: \$380	\$2,025 - \$2,500

Defense Firm Name	Case Name	Citation	Non-Partner Attorneys' Fee Range	Partners' Fee Range
Wilmer Cutler Pickering Hale and Dorr LLP	In re 23andMe Holding Co., et al., Debtors, No. 25-40976	(Bankr. E.D. Mo.) (May 2025) (ECF No. 406)	Counsel: \$1,400 - \$1,600 Associate: \$825 - \$1,370 Paraprofessional: \$550 - \$820	\$1,600 - \$2,600
	In re Invivo Therapeutics Corp., et al., Debtors, No. 24-10137 (MFW)	(Bankr. D. Del.) (Jul. 2024) (ECF No. 282)	Counsel: \$1,360 Senior Paralegal: \$710	\$1,795
Wilson Sonsini Goodrich & Rosati, P.C.	In re Plenty Unlimited Texas LLC, et al., Debtors, No. 25-90105 (CML)	(Bankr. S.D. Tex.) (Apr. 2025) (ECF No. 198)	Counsel: \$1,085 - \$2,100 Associate: \$615 - \$1,380 Staff: \$260 - \$1,250	\$1,350 - \$2,545
	In re Potrero Medical, Inc., Debtor, No. 23-11900 (LSS)	(Bankr. D. Del.) (Mar. 2024) (ECF No. 200)	Associate: \$705 - \$1,090 Senior Paralegal: \$445	\$1,085 - \$1,400

EXHIBIT 11

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-NAR-TAM

**DECLARATION OF JONATHAN HORNE, ESQ. IN SUPPORT OF LEAD COUNSEL'S
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES FILED ON BEHALF OF
THE ROSEN LAW FIRM, P.A.**

I, Jonathan Horne, declare as follows:

1. I am a partner at the law firm The Rosen Law Firm, P.A. (“Rosen Law”).¹ Rosen Law is one of the Court-appointed Lead Counsel in the above-captioned action (the “Action”). ECF No. 22. I submit this declaration in support of Lead Counsel’s application for an award of attorneys’ fees in connection with services rendered in the Action, as well as for reimbursement of litigation expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. As Lead Counsel, Rosen Law was involved in all aspects of the litigation. Among other things, Rosen Law, in conjunctions with co-Lead Counsel The Rosen Law Firm P.A.: (a) negotiated an agreement on the appointment of Lead Plaintiffs in the Action; (b) conducted extensive research and investigation before filing the amended complaint; (c) opposed Defendants’ motion to dismiss the amended complaint; (d) evaluated the Court’s ruling on Defendants’ motion to dismiss the amended complaint and conducted additional comprehensive research and investigation before filing a Second Amended Complaint (“SAC”); (e) opposed Defendants’ motion to dismiss the SAC; (f) evaluated the Court’s ruling on Defendants’ motion to dismiss the SAC; (g) moved for reconsideration of certain aspects of the Court’s ruling on Defendants’ motion to dismiss the SAC and moved for certification of the Court’s order and entry of judgment on behalf of Plaintiffs whose claims the Court dismissed; (h) obtained, reviewed, and analyzed approximately 10,615 documents (totaling roughly 68,700 pages) from Defendants; (i) obtained, reviewed, and analyzed approximately 1,735 documents (totaling roughly 32,925 pages) from third parties; (j) deposed eight fact witnesses, including two Individual Defendants; (k) defended

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

and/or attended the depositions of four plaintiffs, one fact witness, and one of Plaintiffs' experts; (l) propounded three sets of requests for production of documents, four sets of interrogatories, and one set of requests for admissions (containing 97 requests); (m) served six subpoenas *duces tecum* on various third parties; (n) moved for leave to file a third amended complaint to add Montgomery Brantley as a named plaintiff; (o) prepared responses for, and produced documents related to, two sets of requests for production of documents upon Plaintiffs; (p) produced approximately 85,050 pages of documents to Defendants; (q) responded to Defendants' interrogatories; (r) filed a voluminous motion for class certification and reply in support of the motion; (s) moved for leave to file a fourth amended complaint to allege additional scienter claims with respect to Virgin Galactic CEO Michael Colglazier; (t) engaged in extensive settlement discussions and participated in a full-day mediation session; and (u) negotiated an agreement to settle the Action and the Stipulation of Settlement and the exhibits thereto.

3. The schedule attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by attorneys of my firm who, from inception of the Action through and including May 20, 2026, billed ten or more hours to the Action, and the lodestar calculation for those individuals based on my firm's current billing rates. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such personnel in his or her final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm, which are being submitted to the Court under seal for its in camera review.

4. I am the partner who oversaw or conducted the day-to-day activities in the Action and I reviewed these daily time records in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the records as well as the necessity for,

and reasonableness of, the time committed to the litigation. As a result of this review, I made reductions to certain of my firm's time entries such that the time included in Exhibit A reflects that exercise of billing judgment. Based on this review and the adjustments made, I believe that the time of Rosen Law attorneys and staff reflected in Exhibit A was reasonable and necessary for the effective and efficient prosecution and resolution of the Action. No time expended on the application for fees and reimbursement of expenses has been included.

5. The hourly rates for the attorneys in my firm included in Exhibit A are consistent with the rates approved by courts in other securities or shareholder litigation when conducting a lodestar cross-check.

6. The total number of hours reflected in Exhibit A is 2,040.82 hours. The total lodestar reflected in Exhibit A is \$2,581,839.60, consisting of attorneys' time.

7. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

8. As detailed in Exhibit B, my firm is seeking reimbursement of a total of \$487,443.03 in expenses incurred in connection with the prosecution of this Action. Documentation supporting Exhibit B is being submitted to the Court under seal for its *in camera* review.

9. The litigation expenses incurred in the Action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. The expenses reflected in Exhibit B are the expenses actually incurred by my firm.

10. Attached hereto as Exhibit C is a brief biography of Rosen Law, including the attorneys who were involved in the Action.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on May 27, 2026, in New York, New York.

/s/ Jonathan Horne

Jonathan Horne

EXHIBIT A

Lavin v. Virgin Galactic Holdings, Inc., et al.,
Case No. 1:21-cv-03070-NRM-TAM

The Rosen Law Firm, P.A.

LODESTAR REPORT
FROM INCEPTION THROUGH MAY 20, 2026

TIMEKEEPER/CASE	STATUS	HOURS	RATE	LODESTAR
ATTORNEYS:				
Brian Alexander	Partner	29.5	\$1,403	\$41,388.50
Erica Stone	Partner	24.66	\$1,273	\$31,392.18
Jonathan Horne	Partner	1,485.5	\$1,273	\$1,891,041.50
Jonathan Stern	Partner	82.7	\$1,403	\$116,028.10
Laurence Rosen	Partner	28.7	\$1,512	\$43,394.40
Brent LaPointe	Counsel	172.5	\$1,151	\$198,547.50
Gonen Haklay	Counsel	152	\$1,403	\$213,256
Henry Bloxenheim	Attorney	16.41	\$717	\$11,765.97
Ian McDowell	Attorney	11.96	\$717	\$8,575.32
Nick Manningham	Attorney	36.89	\$717	\$26,450.13
TOTAL LODESTAR		2,040.82		\$2,581,839.60

EXHIBIT B

Lavin v. Virgin Galactic Holdings, Inc., et al.,
Case No. 1:21-cv-03070-NRM-TAM

The Rosen Law Firm, P.A.

EXPENSE REPORT

FROM INCEPTION THROUGH MAY 1, 2026

ITEM	AMOUNT
Expert Fees	\$375,037.82
Investigator Fees	\$32,199.84
Online Legal Research and Document Retrieval Fees	\$14,758.27
Discovery Database Hosting Fees	\$8,142.77
Transcript Fees	\$31,474.01
Mediation Fees	\$8,482.58
Courier/Special Postage	\$30.40
Press Releases and Notice to Class Members Fees	\$3,404.81
Airfare/Travel/Parking/Meals/Miscellaneous	\$13,912.53
GRAND TOTAL	\$487,443.03

EXHIBIT C

The Rosen Law Firm, P.A.

FIRM RESUME

I. ATTORNEYS

LAURENCE ROSEN – MANAGING PARTNER

Laurence Rosen is a 1988 graduate of New York University School of Law. He earned an M.B.A. in finance and accounting at the University of Chicago Graduate School of Business and a B.A. in Economics from Emory University. Mr. Rosen served as a law clerk to the Honorable Stanley S. Brotman, Senior United States District Judge for the District of New Jersey. Mr. Rosen entered private practice as an associate at the law firm of Skadden Arps Slate Meagher & Flom in New York City where he participated in a number of complex securities class action and derivative litigation matters. He later served as an associate at McCarter & English in Newark, New Jersey where he specialized in securities and business litigation.

After practicing general securities and commercial litigation in New York City with Solton Rosen & Balakhovsky LLP, Mr. Rosen founded The Rosen Law Firm to represent investors exclusively in securities class actions and derivative litigation. Mr. Rosen is admitted to practice law in Arizona, California, Florida, New Jersey, and New York. Mr. Rosen is also admitted to practice before numerous United States District Courts throughout the country and the United States Court of Appeals for the Second, Fourth, and Sixth Circuits.

In 2019-2025 Lawdragon named Mr. Rosen as one of the 500 Leading Plaintiff Financial Lawyers. Mr. Rosen was also named by law360 as Titan of Plaintiffs' Bar for 2020. Mr. Rosen was selected to *Super Lawyers* in 2017-2024.

PHILLIP KIM – PARTNER

Mr. Kim graduated from Villanova University School of Law in 2002. He received a B.A. in Economics from The Johns Hopkins University in Baltimore, Maryland in 1999. Prior to joining The Rosen Law Firm, Mr. Kim served as Assistant Corporation Counsel for the City of New York in the Special Federal Litigation Division. In that position, Mr. Kim defended a number of class action lawsuits, litigated numerous individual actions, and participated in more than seven trials. Mr. Kim focuses his practice on securities class actions and shareholder derivative litigation. Mr. Kim is admitted to the bar of the State of New York and admitted to practice in the Southern, Eastern, Northern and Western Districts of New York, the District of Colorado, the Eastern District of Wisconsin, the Eastern District of Michigan, the Southern District of Texas, the District of Maryland, and United States Court of Appeals for the Second, Sixth and Ninth Circuits.

In 2019-2025 Lawdragon named Mr. Kim as one of the 500 Leading Plaintiff Financial Lawyers. In 2023-2024 Mr. Kim was selected to Super Lawyers. Mr. Kim was recognized by Best Lawyers in The Best Lawyers of America 2024-2026.

JACOB A. GOLDBERG – PARTNER

Mr. Goldberg is a 1988 graduate of Columbia University. Mr. Goldberg received his J.D., *cum laude*, from the Temple University School of Law in 1992. For over 23 years, Mr. Goldberg has litigated complex cases at the highest levels, championing the rights of investors, employees and consumers. Mr. Goldberg has recovered over \$200 million for investors in securities class actions. In addition to serving in leadership roles in securities class actions, Mr. Goldberg has litigated many cases under state corporations laws, against faithless boards of directors both on behalf of shareholders, in the mergers and acquisitions context, and, derivatively, on behalf of corporations, to remedy harm to the corporation itself. Mr. Goldberg is admitted to practice law in the Commonwealth of Pennsylvania, New York, the United States Supreme Court, the United

States Court of Appeals for the Second, Third, Fourth and Sixth Circuits, and various United States District Courts across the country.

In 2019-2025 Lawdragon named Mr. Goldberg as one of the 500 Leading Plaintiff Financial Lawyers.

JONATHAN A. SAIDEL – PARTNER

Mr. Saidel has had a long and distinguished career in Pennsylvania politics, as well as in the roles of attorney, accountant and author. He served as Philadelphia city controller for four consecutive terms, each time earning reelection by a wide margin, and enacting financial reforms that have saved taxpayers upwards of \$500 million. Later, in 2010 he went on to campaign for lieutenant governor of Pennsylvania, where he was runner-up to Scott Conklin by only a few thousand votes out of almost 1 million cast. A Lifelong resident of Northeast Philadelphia, Mr. Saidel's tireless dedication to fiscal discipline reduced the city's tax burden and spurred economic development. Mr. Saidel also pushed for important business tax incentives and expanded minority and small business lending, all of which have revitalized the city, helping it prosper and come back from the brink of bankruptcy in the early 1990's to become one of the most vibrant cities on the East Coast.

Mr. Saidel's book, "Philadelphia: A New Urban Direction", is widely considered an essential guide for effective government and corporate governance and is required reading at many colleges and universities.

Mr. Saidel received his JD from the Widener University of Law and is a graduate of Temple University. He is also an adjunct lecturer at the University of Pennsylvania Fels Institute of Government, and Drexel University's MBA Program. In addition to being a Certified Public Account, Jonathan is a recipient of the National Association of Local Government Auditor's

Knighon Award, the President's Council on Integrity and Efficiency Award for Excellence, multiple special project awards from the National Association of Local Government Auditors, and the "Controller of the Year" award, a peer recognition presented by the Pennsylvania City Controllers Association.

SARA FUKS – PARTNER

Ms. Fuks graduated from Fordham University School of Law, *cum laude*, in February 2005, where she was a member of Fordham Law Review. She received her B.A. in Political Science, magna cum laude, from New York University in 2001. Ms. Fuks began her practice at Dewey Ballantine, LLP where she focused on general commercial litigation and then went on to prosecute numerous ERISA and securities class actions as an associate at Milberg LLP. Ms. Fuks is admitted to the bar of the State of New York and admitted to practice in the United States District Courts for the Southern District and Eastern District of New York, and the Eastern District of Michigan. Ms. Fuks was selected to SuperLawyers in 2021-2024 and SuperLawyers Rising Stars in 2017-2019. In 2025 Lawdragon named Ms. Fuks as one of the 500 Leading Plaintiff Financial Lawyers.

JONATHAN HORNE – PARTNER

Mr. Horne is a 2009 graduate of New York University School of Law, where he received the Lederman/Milbank Law, Economics, and Business fellowship, and holds a B.A. in Economics & Philosophy from the University of Toronto. Mr. Horne began his practice at Kaye Scholer LLP. Mr. Horne specializes in securities litigation. He is admitted to practice in New York and the United States District Courts for the District of Colorado and the Southern and Eastern Districts of New York. Mr. Horne was named a Super Lawyer – Rising Star for the New York Metro Area

every year since 2015. In 2025 Lawdragon named Mr. Horne as one of the 500 Leading Plaintiff Financial Lawyers.

YU SHI – PARTNER

Mr. Shi received his J.D. from Columbia Law School in 2011 and his B.A., *cum laude*, from Columbia University in 2008. In 2024 and 2005, Lawdragon recognized Mr. Shi as one of the 500 Leading Plaintiffs Financial Lawyers. In 2022, Law360 named Mr. Shi as one of the nation's top securities attorneys under the age of 40. He has been selected to *Super Lawyers* each year since 2018. Mr. Shi began his career as a Special Assistant Corporation Counsel in the New York City Law Department's Economic Development Division. Mr. Shi joined The Rosen Law Firm in 2012 and focuses his practice on securities litigation. He is admitted to practice in the State of New York, the United States District Courts for the Eastern District of New York, Southern Districts of New York, and the District of Colorado, and the United States Court of Appeals for the Second Circuit.

JONATHAN STERN – PARTNER

Mr. Stern graduated from New York University School of Law in May of 2008, where he was a Development Editor of the Annual Survey of American Law. He received his B.A. in Philosophy with Honors from McGill University. Mr. Stern began his practice in the litigation department of Simpson Thacher & Bartlett LLP, and then went on to practice at the litigation boutique of Simon & Partners LLP, where he participated in a Federal trial. Mr. Stern is admitted to the bar of the State of New York and admitted to practice in the United States Southern and Eastern District Courts of New York and the United States Court of Appeals for the Second Circuit for the First, Sixth, Seventh, Eighth and Ninth Circuits, and the United States Supreme Court. In 2024-25 Lawdragon named Mr. Stern as one of the 500 Leading Plaintiff Financial Lawyers.

JING CHEN – PARTNER

Ms. Chen received a Juris Doctor degree from Pace University School of Law in 2011, Juris Master degree from China University of Political Science and Law in Beijing, China and B.A. in English Literature and Linguistics from Shandong University in Jinan, China. She is admitted to practice in New York, New Jersey, and China. Prior to joining The Rosen Law Firm, Ms. Chen practiced corporate law, commercial transactions and arbitration for over two years. In 2024-25 Lawdragon named Ms. Chen as one of the 500 Leading Plaintiff Financial Lawyers.

BRIAN ALEXANDER – PARTNER

Mr. Alexander graduated from Harvard Law School, *cum laude*, in 2008. He received a B.A. from Cornell University, *magna cum laude*, in 2003. Prior to joining the Rosen Law Firm, Mr. Alexander practiced complex commercial litigation at Boies Schiller Flexner LLP and other prominent law firms in New York. He also served as a law clerk to the Honorable Raymond J. Dearie of the United States District Court for the Eastern District of New York. He is admitted to practice in New York, the United States District Courts for the Eastern and Southern Districts of New York, and United States Court of Appeals for the Ninth Circuit. Mr. Alexander was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2025. In 2025 Lawdragon named Mr. Alexander as one of the 500 Leading Plaintiff Financial Lawyers.

DANIEL TYRE-KARP – PARTNER

Prior to joining The Rosen Law Firm in May 2018, Mr. Tyre-Karp was a senior associate in the securities litigation and corporate governance group at Weil, Gotshal & Manges, where he advised corporate and individual clients on a variety of high-stakes regulatory and litigation matters in state and federal courts. Mr. Tyre-Karp's extensive experience includes working on several of the largest recent shareholder class action litigations (*In re American International*

Group, Inc. 2008 Securities Litigation, Docket No. 08-CV-4772 (S.D.N.Y.) and related opt-out actions; *In re El Paso Corporation Shareholder Litigation*, Docket No. 6949 (Del. Ch.), participating in complex business and bankruptcy litigations (*In re Lehman Brothers Holdings, Inc., et al*, Docket No. 1:08-bk-13555 (Bankr. S.D.N.Y.)), and advising numerous clients facing FINRA and SEC investigations. Mr. Tyre-Karp graduated with honors from Wesleyan University in 2003 and received his J.D. from New York University School of Law in 2009, where he served as Senior Notes Editor of the *Journal of Legislation and Public Policy*. He is admitted to practice in New York and the United States District Courts for the Southern and Eastern Districts of New York. Mr. Tyre-Karp was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2025-2026. In 2025 Lawdragon named Mr. Tyre-Karp as one of the 500 Leading Plaintiff Financial Lawyers.

ERICA STONE – PARTNER

Ms. Stone graduated from the Benjamin N. Cardozo School of Law in 2013. She received her B.A. in Political Science and Communications, *cum laude*, from the University of Pennsylvania in 2009. She is admitted to practice in New York, New Jersey, and the United States District Courts for the Southern District and Eastern District of New York, the District of New Jersey, the Eastern District of Wisconsin, and the Eastern District of Michigan. In 2024, Ms. Stone was selected to *Super Lawyers*. Ms. Stone was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2025-2026.

JOSHUA BAKER – PARTNER

Mr. Baker graduated from the New York University School of Law in 2013. He received a B.A. from the University of Maryland in 2009. Prior to joining the Rosen Law Firm, Mr. Baker practiced complex commercial litigation for a New York firm. He is admitted to practice in New

York, Massachusetts, and United States District Courts for the Eastern and Southern Districts of New York and the District of Massachusetts. Mr. Baker was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2025-2026.

MATTHEW P. SIBEN – PARTNER

Mr. Siben has 25 years of experience prosecuting high-profile securities fraud class actions on behalf of individual institutional investors. After graduating from Harvard Law School in 2000, Mr. Siben joined Milberg Weiss Bershad Hynes & Lerach to focus on securities litigation. Mr. Siben was influential in developing the scheme liability theories necessary to hold Enron's investment bank partners liable for their role in falsifying Enron's financial statements. Mr. Siben also had primary responsibility for prosecuting the case against Citigroup, obtaining a \$2 billion settlement on behalf of the class.

In 2007, Mr. Siben joined litigation boutique Bernstein Litowitz Berger & Grossmann LLP to prosecute class cases and create the firm's opt-out practice representing institutional investors in direct actions. Among other successes, Mr. Siben initiated and prosecuted the firm's first opt-out action against Tyco International. Representing several mutual funds, a public pension fund, and hedge funds including Leon Cooperman's Omega Partners, Mr. Siben settled the case against Tyco for \$100 million. This settlement represented a significant multiplier over the recovery in the class case and continues to be a benchmark in opt-out litigation.

Mr. Siben is admitted to the bars of California, Florida, New York, and the United States District Courts for the Eastern and Southern Districts of New York, the United States District Courts for the Southern, Central, Eastern, and Northern Districts of California, the United States District Courts for the Southern and Middle Districts of Florida, and the United States District Court for the District of Colorado.

ROBIN BRONZAFT HOWALD – COUNSEL

Ms. Howald is a graduate of Stanford Law School where she was a member of the Stanford Law Review. Ms. Howald earned her BA from Barnard College, magna cum laude. Ms. Howald joined the firm in 2021 and focuses her practice on securities litigation. For the last 15 years, Ms. Howald has prosecuted major securities litigations. She was one of the lead attorneys in cases that achieved settlements of \$250 million for injured investors, including *Schleicher v. Wendt*, 618 F.3d 679 (7th Cir. 2010) (\$41.5 million), *In re Mannkind Corp. Securities Litigation* (C.D. California) (\$23 million); *In re ECI Telecom Ltd. Securities Litigation* (Eastern District of Virginia) (\$21.75 million), *In re Gilat Satellite Networks, Ltd. Securities Litigation* (E.D.N.Y.) (\$20 million), *In re Musicmaker.com Securities Litigation*, 2001 WL 34062431 (C.D. Cal. 2001) (\$13.75 million), *In re Puda Coal Inc. Securities Litigation* (S.D.N.Y.) (\$8.6 million following reconsideration of grant of summary judgment), *Jenson v. Fiserv Trust Co.*, 256 F. App'x. 924 (9th Cir. 2007) (\$8.5 million recovered for victims of a Ponzi scheme). Ms. Howald is admitted to the bars of California, New York, the United States District Courts for the Eastern and Southern Districts of New York, the Central, Eastern, and Northern Districts of California, the Eastern District of Michigan, and the United States Court of Appeals for the First, Sixth, Seventh, Eighth, and Ninth Circuits.

GONEN HAKLAY – COUNSEL

Mr. Haklay graduated from Stanford University School of Law in 1995. He received a B.A. in Political Science from The University of Massachusetts at Amherst in 1992. After several years as an associate at a large Philadelphia law firm, Mr. Haklay joined the Philadelphia District Attorney's office. As a prosecutor, he tried over 100 criminal jury cases and handled both capital and non-capital homicide cases. After 12 years as prosecutor, Mr. Haklay joined a prominent plaintiffs' firm where he tried over ten asbestos cases, recovering millions of dollars for his clients.

As a young man, Mr. Haklay served as an infantryman in the Israel Defense Forces. Mr. Haklay is admitted to the bars of the Commonwealth of Pennsylvania, the State of New Jersey, the United States District Court for the Eastern District of Pennsylvania, and the United States Third Circuit Court of Appeals. Mr. Haklay was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2025-2026.

MICHAEL COHEN – COUNSEL

Mr. Cohen focuses his practice on securities and shareholder derivative litigation. Prior to joining The Rosen Law Firm in 2021, Mr. Cohen was an associate in the litigation practice of Kramer Levin Naftalis & Frankel LLP, where he advised corporate and individual clients on a wide variety of litigation and regulatory matters in federal and state courts. He has also served as a law clerk to the Honorable Corinne Beckwith of the District of Columbia Court of Appeals. Mr. Cohen is admitted to practice in New York and the United States District Courts for the Eastern and Southern Districts of New York. Mr. Cohen was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2023-2026. In 2025, Mr. Cohen was recognized by ALM Law.com Elite Trial Lawyers, Rising Star of the Plaintiffs Bar.

LEAH HEIFETZ-LI – COUNSEL

Ms. Heifetz-Li is a 2009 graduate of Columbia Law School, and received a B.A. from the University of Pennsylvania. Ms. Heifetz-Li served as a Law Clerk to the Honorable Cynthia S. Kern, New York State Supreme Court, New York County. She has extensive experience in class action litigation, having previously practiced at a large class action firm representing shareholders in merger and acquisition litigation as well as shareholder derivative actions. Ms. Heifetz-Li has worked on case teams that secured significant financial recoveries for stockholders as well as

corporate governance reforms in the Delaware Court of Chancery and other courts throughout the country. Ms. Heifetz-Li was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2026.

HENRY BLOXENHEIM – ATTORNEY

Mr. Bloxenheim graduated from Columbia Law School in 2023. Mr. Bloxenheim received his B.A. in Political Science, *summa cum laude*, from Brooklyn College. Mr. Bloxenheim is admitted to practice in New York and in the United States District Courts for the Southern District and Eastern District of New York.

CHRISTIE BUZZETTI – ATTORNEY

Ms. Buzzetti graduated from Brooklyn Law School in 2022. She received her B.A. in Political Science from the University of California, Los Angeles in 2016. Ms. Buzzetti is admitted to practice in New York and in the United States District Courts for the Eastern and Southern District of New York. Ms. Buzzetti was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2026.

JOSHUA CLEVELAND – ATTORNEY

Mr. Cleveland graduated from Rutgers Law School in 2024, where he served as State Constitutional Law Editor of the *Rutgers University Law Review*. After law school, he clerked for the Honorable Michael J. Kassel in Camden County, New Jersey, assisting on matters involving complex civil litigation. Before pursuing law, Joshua worked as a financial analyst for a global healthcare information technology company. He draws on this background to advise and represent clients in breach of fiduciary duty and shareholder derivative litigation. Joshua is admitted to practice in Pennsylvania. He holds a B.A. in Economics from Villanova University, with additional study at the London School of Economics.

YITZCHOK (IZZY) FISHBACH – ATTORNEY

Mr. Fishbach received his J.D. from Vanderbilt University Law School in 2022, where he served as the Articles Editor of the Environmental Law and Policy Annual Review. He received his B.A. in Political Science from Binghamton University in 2019. Mr. Fishbach is admitted to practice in New York, Tennessee, and the United States District Courts for the Eastern and Southern Districts of New York.

LUKE FOLEY – ATTORNEY

Mr. Foley received his J.D. from the William and Mary Law School in 2022. He received his B.A. in History and Citizenship & Civic Engagement from Syracuse University in 2016. Prior to joining the Rosen Law Firm in September 2023, Mr. Foley was the Law Clerk to the Hon. Barbara Buono Stanton of the New Jersey Superior Court, Passaic County. Mr. Foley is admitted to practice in Maryland.

RYAN HEDRICK – ATTORNEY

Mr. Hedrick received his J.D. from the University of Chicago in 2019. He received his B.A. in Linguistics and Political Science, *summa cum laude*, from The Ohio State University in 2015. Mr. Hedrick joined the Rosen Law Firm in August 2019. Mr. Hedrick is admitted to practice in New York, New Jersey, the United States District Courts for the Eastern and Southern Districts of New York, the District of New Jersey, the District of Colorado, and United States Court of Appeals for the Ninth Circuit. Mr. Hedrick was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2026.

HA SUNG (SCOTT) KIM – ATTORNEY

Mr. Kim received his J.D. from the Columbia Law School in 2017. He received his B.A., *magna cum laude*, from Wheaton College in 2013. Mr. Kim joined the Rosen Law Firm in January

2020. Mr. Kim is admitted to practice in New York. Mr. Kim was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2026.

IAN McDOWELL – ATTORNEY

Mr. McDowell graduated *cum laude* from the University of Richmond School of Law in 2022. He received his B.A. from James Madison University in 2016. Mr. McDowell is admitted to practice in Pennsylvania and Maryland as well as the United States District Court for the Eastern District of Pennsylvania. Mr. McDowell was recognized by Best Lawyers as Best Lawyers: Ones to Watch 2026.

OLIVIA SIMKINS – ATTORNEY

Ms. Simkins is a 2024 graduate of Tulane University School of Law. She earned her B.A. in Linguistics and English *cum laude* from Tulane University in 2017. Ms. Simkins is admitted to practice in Pennsylvania and the United States District Court for the Eastern District of Pennsylvania.

II. RECENT ACCOMPLISHMENTS OF THE ROSEN LAW FIRM, P.A.

- **Alibaba Group Holding Ltd., (S.D.N.Y.). Rosen Lead Counsel. \$250 million.**
- **Fiat Chrysler Automobiles, (S.D.N.Y.). Rosen Co-Lead Counsel. \$110 million.**
- **Infinity Q Diversified Alpha Fund, (N.Y. Supreme). Rosen Co-Lead Counsel. \$48 million.**
- **Silver Wheaton Corp., (C.D. Cal.). Rosen Lead Counsel. \$41.5 million.**
- **Omega Healthcare Investors, Inc., (S.D.N.Y.). Rosen Lead Counsel. \$30.75 million.**
- **Magnachip Semiconductor Corp., (N.D. Cal.). Rosen Co-Lead Counsel. \$29.7 million.**
- **Och-Ziff Capital Management Group LLC, (S.D.N.Y.). Rosen Co-Lead Counsel. \$28.75 million.**

- **Vanguard Target Date Retirement Funds, (E.D. Pa.).** Rosen Lead Counsel. **\$25 million.**
- **Just Energy Group, Inc., (Canada).** Rosen USA Lead Counsel. **\$25 million (cdn).**
- **Walter Investment Management, (S.D. Fla.).** Rosen Co-Lead Counsel. **\$24 million.**
- **Galena Biopharma, Inc., (D. Or.).** Rosen Co-Lead Counsel. **\$20.165 million.**
- **Live Nation Entertainment, Inc., (C.D. Cal.).** Rosen Co-Lead Counsel. **\$20 million.**
- **El Pollo Loco Holdings, Inc., (C.D. Cal.).** Rosen Co-Lead Counsel. **\$20 million.**
- **VEON Ltd., (S.D.N.Y.).** Rosen Lead Counsel. **\$19.97 million,** pending Court approval.
- **Tibet Pharmaceuticals, Inc., (D.N.J.).** Rosen Lead Counsel. **\$14 million bankruptcy settlement.** **\$2.075 million** with auditor.
- **USA Technologies, Inc., (E.D. Pa.).** Rosen Lead Counsel. **\$15.3 million.**
- **Zillow Group, Inc. Sec. Litig., (W.D. Wash.).** Rosen Lead Counsel. **\$15 million.**
- **Silvercorp Metals, Inc., (S.D.N.Y.).** Rosen Plaintiffs' Counsel. **\$14 million.**
- **Sandridge Energy, Inc., (W.D. Okla.).** Rosen Co-Lead Counsel. **\$13.945 million.**
- **Astec Industries, Inc., (E.D. Tenn.).** Rosen Lead Counsel. **\$13.7 million.**
- **Blue Apron Holdings, Inc., (E.D.N.Y.).** Rosen Co-Lead Counsel. **\$13.25 million.**
- **Canopy Growth Corporation, (D.N.J.).** Rosen Co-Lead Counsel. **\$13 million.**
- **SeaWorld Entertainment Inc. (Shareholder Derivative) (Del. Ch.).** Rosen Co-Lead Counsel. **\$12.5 million.**
- **Arrival SA, (E.D.N.Y.).** Rosen Lead Counsel. **\$11.275 million.**
- **The RealReal, Inc., (N.D. Cal.).** Rosen Lead Counsel. **\$11 million.**
- **Full Truck Alliance Co. (E.D.N.Y.) and (NY. Sup.).** Rosen Federal Lead Counsel. **\$10.25 million.**

- **Quest Energy Partners LP**, (W.D. Okla.). Rosen Lead Counsel. **\$10.1 million** all classes.
- **Prosper Marketplace, Inc.**, (Cal. Superior). Rosen Class Counsel. **\$10 million**.
- **PG&E Corp.**, (N.D. Cal.). Rosen Co-Lead Counsel. **\$10 million**.
- **Textainer Financial Servs. Corp.**, (Cal. Superior). Rosen Co-Lead Counsel. **\$10 million**.
- **comScore, Inc. (Shareholder Derivative)**, Rosen Co-Lead Counsel. **\$10 million**.
- **Santander Consumer USA Holdings Inc.**, (N.D. Tex.). Rosen Co-Lead Counsel. **\$9.5 million**.
- **Uxin Limited**, (E.D.N.Y.). Rosen Lead Counsel. **\$9.5 million**.
- **Concordia International Corp.**, (S.D.N.Y.). Rosen Lead Counsel. **\$9.25 million**.
- **PPDAI Group Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$9 million**.
- **Puda Coal**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$8.7 million**.
- **RINO International Corporation**, (C.D. Cal.). Rosen Lead Counsel. **\$8,685,000**.
- **Virgin Galactic Holdings Inc.**, (E.D.N.Y.). Rosen Co-Lead Counsel. **\$8.5 million**, pending Court approval.
- **Acer Therapeutics, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$8.35 million**.
- **Axsome Therapeutics, Inc.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$7.75 million**.
- **Montage Technology Group Limited**, (N.D. Cal.). Rosen Lead Counsel. **\$7.25 million**.
- **AgFeed Industries**, (M.D. Tenn.). Rosen Lead Counsel. **\$7 million**.
- **Sundial Growers, Inc.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$7 million**.
- **Akazoo S.A.**, (E.D.N.Y.). Rosen Co-Lead Counsel. **\$6.51 million**.
- **Global Brokerage, Inc. f/k/a FXCM, Inc. Sec. Litig.**, (S.D.N.Y.). Rosen Lead Counsel. **\$6.5 million**.
- **Aeterna Zentaris, Inc.**, (D. N.J.). Rosen Class Counsel. **\$6.5 million**.

- **Bender v. Vertex Energy, Inc.**, (S.D. Tex.). Rosen Lead Counsel. **\$6.3 million.**
- **Sunlands Technology Group**, (E.D.N.Y.). Rosen Lead Counsel. **\$6.2 million.**
- **Covia Holdings Corp.**, (N.D. Ohio). Rosen Lead Counsel. **\$6 million.**
- **FalconStor Software, Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$5 million.**
- **Jumia Technologies AG**, (S.D.N.Y.). Rosen Lead Counsel. **\$5 million.**
- **Momo, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$5 million.**
- **SOS Limited**, (D.N.J.). Rosen Co-Lead Counsel. **\$5 million.**
- **Missfresh Limited**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$4.9039 million.**
- **Compass Minerals International**, (D. Kansas). Rosen Lead Counsel, **\$4.9 million.**
- **State Street**, (D. Mass.). Rosen Lead Counsel. **\$4.9 million.**
- **Dada Nexus Limited**, (C.D. Cal.). Rosen Lead Counsel. **\$4.8 million.**
- **Stronghold Digital Mining, Inc.**, (S.D.N.Y.) Rosen Lead Counsel. **\$4.75 million and 25 Bitcoins.**
- **Altice USA Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$4.75 million.**
- **KIOR, Inc.**, (S.D. Tex.). Rosen Co-Lead Counsel. **\$4.5 million.**
- **Entropin, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$4.5 million.**
- **Sonus Networks, Inc.**, (D. Mass.). Rosen Co-Lead Counsel. **\$4.5 million.**
- **Uni-Pixel, Inc.**, (S.D. Tex.). Rosen Co-Lead Counsel. **\$4.5 million.**
- **China Expert Technology, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$4.2 million.**
- **IDreamSky Technology Limited**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$4.15 million.**
- **Universal Travel Group, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$4.075 million.**
- **Allegiant Travel Co.**, (D. Nev.). Rosen Lead Counsel. **\$4 million.**
- **Zynerba Pharms., Inc.**, (E.D. Pa.). Rosen Co-Lead Counsel. **\$4 million.**

- **Dapper Labs, Inc.**, (S.D.N.Y.). Rosen Lead Counsel, **\$4 million**.
- **Liberty Oilfield Services, Inc.**, (D. Colo.). Rosen Lead Counsel. **\$3.9 million**.
- **Caribou Biosciences, Inc.**, (N.D. Cal.). Rosen Co-Lead Counsel. **\$3.9 million**.
- **China Electric Motor, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$3,778,333.33**.
- **IsoRay, Inc.**, (E.D. Wash.). Rosen Co-Lead Counsel. **\$3,537,500**.
- **Deer Consumer Products, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$3.55 million**.
- **SAExploration Holdings, Inc.**, (S.D. Tex.). **\$3.55 million**.
- **L&L Energy, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$3.5 million**.
- **Tarena International, Inc.**, N (E.D.N.Y.). Rosen Lead Counsel. **\$3.5 million**.
- **Catalyst Pharmaceutical Partners, Inc.**, (S.D. Fla.). Rosen Lead Counsel. **\$3.5 million**.
- **Sunlight Financial Holdings, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$3.5 million**.
- **Keyuan Petrochemicals, Inc. and Auditor**, (S.D.N.Y.) & (D.N.J.). Rosen Lead Counsel. **\$3.5 million**.
- **StockerYale, Inc.**, (D.N.H.). Rosen Lead Counsel. **\$3.4 million**.
- **Industrial Enterprises of America, Inc.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$3.4 million**.
- **Ampio Pharmaceuticals, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$3.4 million**.
- **Textura Corporation**, (N.D. Ill.). Rosen Lead Counsel. **\$3.3 million**.
- **Roka Bioscience, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$3.275 million**.
- **Intrusion, Inc.**, (E.D. Tex.). Rosen Lead Counsel. **\$3.25 million**.
- **Wedbush Morgan Securities, Inc.**, (Cal. Superior). Co-Lead Counsel. **\$3.2 million**.
- **New Oriental Education & Technology Group Inc.**, (D.N.J.). Rosen Co-Lead Counsel. **\$3.15 million**.

- **TierOne Corporation**, (D. Neb.). Rosen Lead Counsel. **\$3.1 million.**
- **GDS Holdings Limited**, (C.D. Cal.). Rosen Lead Counsel. **\$3 million.**
- **Hanmi Financial Corporation**, (C.D. Cal.). Rosen Lead Counsel. **\$3 million.**
- **Cadiz, Inc.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$3 million.**
- **Fat Brands, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$3 million.**
- **China Finance Online Co. Limited**, (S.D.N.Y.). Rosen Lead Counsel. **\$3 million.**
- **Skilled Healthcare Group, Inc.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$3 million.**
- **Spectrum Pharms. Inc.**, (D. Nev.). Rosen Lead Counsel. **\$2.995 million.**
- **MiMedx Group, Inc.**, (N.D. Ga.). Rosen Lead Counsel. **\$2.979 million.**
- **Pegasus Communications Corp**, (E.D. Pa.). Rosen Lead Counsel. **\$2.95 million.**
- **Albany Molecular Research**, (E.D.N.Y.). Rosen Lead Counsel. **\$2.868 million.**
- **Lihua International, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$2.865 million.**
- **TVIA, Inc.**, (N.D. Cal.). Rosen Lead Counsel. **\$2.85 million.**
- **New Source Energy Partners LP**, (S.D.N.Y.). Rosen Lead Counsel. **\$2.85 million.**
- **Innocoll Holdings Public Ltd.**, (E.D. Pa.). Rosen Lead Counsel. **\$2.755 million.**
- **GigaCloud Technology Inc.**, (S.D.N.Y.) **\$2.75 million.**
- **Natural Health Trends Corp., et al.**, (N.D. Tex.). Rosen Lead Counsel. **\$2.75 million.**
- **Sequans Communications**, (E.D.N.Y.). Rosen Co-Lead Counsel. **\$2.75 million.**
- **Akari Therapeutics PLC**, (S.D.N.Y.). Rosen Lead Counsel. **\$2.7 million.**
- **Electric Last Mile Solutions**, (D.N.J.). Rosen Lead Counsel. **\$2.7 million.**
- **Growlife, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$2.7 million (cash and stock).**
- **Tangoe, Inc.**, (D. Conn.). Rosen Co-Lead Counsel. **\$2.55 million.**
- **Blue Ridge Bankshares, Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$2.5 million.**

- **Twitter, Inc.,** (Cal. Superior). Rosen Co-Lead Counsel. **\$2.5 million.**
- **Radiant Pharmaceuticals Corporation,** (C.D. Cal.). Rosen Lead Counsel. **\$2.5 million.**
- **Robert T. Harvey Securities Litigation,** (C.D. Cal.). Rosen Co-Lead Counsel. **\$2.485 million.**
- **China Education Alliance, Inc.,** (C.D. Cal.). Rosen Lead Counsel. **\$2.425 million.**
- **Oasmia Pharmaceuticals AB.,** (E.D.N.Y.). Rosen Co-Lead Counsel. **\$2.35 million.**
- **Capstone Green Energy Corp.,** (C.D. Cal.). Rosen Co-Lead Counsel. **\$2.25 million.**
- **BioAmber, Inc.,** (E.D.N.Y.). Rosen Co-Lead Counsel. **\$2.25 million.**
- **DouYu International Holdings Ltd.,** (D.N.J.). Rosen Co-Lead Counsel. **\$2.25 million.**
- **NetApp, Inc.,** (N.D. Cal.). Rosen Lead Counsel. **\$2.25 million.**
- **Akers Biosciences, Inc.,** (D.N.J.). Rosen Lead Counsel. **\$2.25 million.**
- **Kanzhun Limited,** (D.N.J.). Rosen Lead Counsel. **\$2.25 million.**
- **SkyPeople Fruit Juice,** (S.D.N.Y.). Rosen Lead Counsel. **\$2.2 million.**
- **Caesarstone Sdot-Yam Ltd.,** (S.D.N.Y.). Rosen Co-Lead Counsel. **\$2.2 million.**
- **RCI Hospitality Holdings Inc.,** (S.D. Tex.). Rosen Co-Lead Counsel. **\$2.2 million.**
- **Fuwei Films,** (S.D.N.Y.). Rosen Lead Counsel. **\$2.15 million.**
- **Gulf Resources, Inc.,** (C.D. Cal.). Rosen Lead Counsel. **\$2.125 million.**
- **PTC Inc.,** (D. Mass.). Rosen Lead Counsel. **\$2.1 million.**
- **DS Healthcare Group, Inc.,** (S.D. Fla.). Rosen Lead Counsel. **\$2.1 million.**
- **Indivior PLC,** (D.N.J.). Rosen Lead Counsel. **\$2 million.**
- **Orient Paper, Inc.,** (C.D. Cal.). Rosen Lead Counsel. **\$2 million.**
- **Mesoblast Limited,** (S.D.N.Y.). Rosen Lead Counsel. **\$2 million.**
- **GTT Communications, Inc.,** (C.D. Cal.). Rosen Lead Counsel. **\$2 million.**

- **EHang Holdings Limited.** (C.D. Cal.). Rosen Lead Counsel, **\$1,985,000.**
- **Latch, Inc.,** (S.D.N.Y.). Rosen Lead Counsel. **\$1.95 million.**
- **iBio, Inc.,** (D. Del.). Rosen Lead Counsel. **\$1.875 million.**
- **CD Projekt SA, No. CV-20-11627 (FMO)(RAOx)** (C.D. Cal.). **\$1.85 million.**
- **Ignite Restaurant Group, Inc.,** (S.D. Tex.). Rosen Lead Counsel. **\$1.8 million.**
- **Electronic Game Card, Inc.,** (C.D. Cal.). Rosen Lead Counsel. **\$1.755 million.**
- **BMW AG,** (D.N.J.). Rosen Lead Counsel. **\$1.75 million.**
- **Natural Health Trends Corp.,** (C.D. Cal.). Rosen Co-Lead Counsel. **\$1.75 million.**
- **Flux Power Holdings, Inc.,** (S.D. Cal.). Rosen Lead Counsel. **\$1.75 million.**
- **Corrrevio Pharma Corp.,**(S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.75 million.**
- **Delstaff LLC (Merger Litigation),** (Cal. Superior). **\$1.6425 million.**
- **Worldwide Energy & Manufacturing USA, Inc,** (Cal. Superior). Rosen Lead Counsel. **\$1.615 million.**
- **Cummins, Inc.,** (S.D. Ind.). Rosen Lead Counsel. **\$1.6 million,** pending court approval.
- **Alliance MMA, Inc.,** (D.N.J.). Rosen Lead Counsel. **\$1.55 million.**
- **Lightinthebox Holding Co., Ltd.,** (S.D.N.Y.). Rosen Lead Counsel. **\$1.55 million.**
- **Nutracea, Inc.,** (D. Ariz.). Rosen Lead Counsel. **\$1.5 million.**
- **Kraton Corporation,** (S.D. Tex.). Rosen Lead Counsel. **\$1.5 million.**
- **RMG Networks Holding Corporation (Merger Litigation),** (Del. Ch.). **\$1.5 million.**
- **BlueNRGY Group Ltd, f/k/a CBD Energy Ltd.,** (S.D. Tex.). Rosen Lead Counsel. **\$1.5 million.**
- **Ambow Education Holding Ltd.,** (C.D. Cal.). Rosen Lead Counsel. **\$1.5 million.**
- **Active Power, Inc.,** (W.D. Tex.). Rosen Lead Counsel. **\$1.5 million.**

- **Northfield Laboratories, Inc.**, (N.D. Ill.). Rosen Lead Counsel. **\$1.5 million.**
- **PartsBase.com, Inc.**, (S.D. Fla.). Rosen Lead Counsel. **\$1.5 million.**
- **China Natural Gas, Inc.**, (D. Del.). Rosen Lead Counsel. **\$1.5 million.**
- **FAB Universal Corp.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.5 million.**
- **Sogou, Inc.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.45 million.**
- **Code Rebel Corp.**, (S.D.N.Y.). Rosen Co-Lead Counsel. **\$1.415 million.**
- **Empyrean Bioscience**, (N.D. Ga.). Rosen Lead Counsel. **\$1.4 million.**
- **Shattuck Labs, Inc.**, (E.D.N.Y.). Rosen Lead Counsel. **\$1.4 million.**
- **Longeveron, Inc.**, (S.D. Fla.). Rosen Lead Counsel. **\$1.395 million.**
- **Agria, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$1.3 million.**
- **Aterian, Inc.**, (S.D.N.Y.). Rosen Lead Counsel. **\$1.3 million.**
- **CoCrystal Pharma, Inc.**, (D.N.J.). Rosen Lead Counsel. **\$1.265 million.**
- **Wins Financial Holdings, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$1.26 million**, pending Court approval.
- **ERBA Diagnostics, Inc.**, (S.D. Fla.). Rosen Lead Counsel. **\$1.215 million.**
- **Yingli Green Energy Holding Co. Ltd.**, (C.D. Cal.). Rosen Lead Counsel. **\$1.2 million.**
- **Himax Technologies, Inc.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$1.2 million.**
- **Flight Safety Technologies, Inc.**, (D. Conn.). Rosen Lead Counsel. **\$1.2 million.**
- **M.H. Meyerson & Co.**, (D.N.J.). Rosen Lead Counsel. **\$1.2 million.**
- **Izea, Inc.**, (C.D. Cal.). Rosen Co-Lead Counsel. **\$1.2 million.**
- **Hywin Holdings Ltd.** (N.Y. Supreme). Rosen Lead Counsel. **\$1 million.**
- **India Globalization Capital, Inc.**, (D. Md.). Rosen Co-Lead Counsel. **\$1 million.**
- **National Lampoon, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$1 million.**

- **Lentuo International, Inc.**, (C.D. Cal.). Rosen Lead Counsel. **\$1 million.**
- **Katanga Mining Limited**, (D.N.J.). Rosen Lead Counsel. **\$1 million.**
- **Busybox.com, Inc.**, (Cal. Superior). Rosen Co-Lead Counsel. **\$1 million.**

III. SECURITIES CLASS ACTIONS IN WHICH THE ROSEN LAW FIRM, P.A. IS CURRENTLY LEAD COUNSEL

In re Maiden Holdings, Ltd. Securities Litigation, No. 19-CV-5296-RMB-JS (D.N.J.)

Rosen Co-Lead Counsel.

In re ChinaCast Education Corporation Sec. Litig., No. CV 12-4621- JFW (PLAx) (C.D.

Cal.). Rosen Co-Lead Counsel.

In re NIO, Inc. Securities Litigation, No. 19-CV-1424 (NGG) (JRC) (E.D.N.Y.). Rosen

Class Counsel.

Hoang v. ContextLogic, Inc., No. 21-cv-3930-BLF (N.D. Cal.). Rosen Co-Lead Counsel.

Mallozzi v. Innovative Industrial Properties, Inc., No. 22-cv-2359-EP-JRA (D.N.J.).

Rosen Lead Counsel.

Farhar v. Ontrak, Inc., No. 21-CV-1987-FLA-A (C.D. Cal.). Rosen Lead Counsel.

In re Volkswagen AG Sec. Litig., No. 22-cv-45-RDA-TCB (E.D. Va.). Rosen Lead

Counsel.

In re DiDi Global Inc. Sec. Litig., No. 21-CV-5807 (LAK) (S.D.N.Y.). Rosen Lead

Counsel.

Patterson v. TerraForm Labs Pte Ltd., No. 22-cv-3600-TLT (N.D. Cal.). Rosen Lead

Counsel.

Diaz v. The Gap, Inc., No. 22-cv-7371 (DG)(RER) (E.D.N.Y.). Rosen Lead Counsel.

Armbruster v. Gaia, Inc., No. 22-CV-3267 (D. Colo.). Rosen Lead Counsel.

Pang v. Levitt (Core Scientific, Inc.), No. 22-CV-1191-LY (W.D. Tex.). Rosen Lead Counsel.

Goodman v. Wheels Up Experience, Inc., No. 23-cv-2900 (OEM)(VMS) (E.D.N.Y.). Rosen Lead Counsel.

In re Enovix Corp. Sec. Litig., No. 23-cv-71-SI (N.D. Cal.). Rosen Co-Lead Counsel.

Gambrill v. CS Disco, Inc., No. 23-cv-8270 (LAK)(SN) (S.D.N.Y.). Rosen Lead Counsel.

Lewandowski v. Tal Education Group, No. 23-cv-1769 (MEF) (JRA) (D.N.J.). Rosen Lead Counsel.

Tan v. PacWest Bancorp., No. CV-23-1685 (JWH)(ADSx) (C.D. Cal.). Rosen Co-Lead Counsel.

Maschhoff v. Polished.com, No. 22-cv-6605(NGG)(VMS) (E.D.N.Y.). Rosen Lead Counsel.

Pelham v. VBIT Tech. Corp., No. 23-CV-162-CFC-SRF (D. Del.). Rosen Lead Counsel.

Sporn v. Brainstorm Cell Therapeutics, Inc., No. 23-cv-9630 (DEH) (S.D.N.Y.) Rosen Lead Counsel.

Schelling v. Microvast Holdings, Inc., No. 23-cv-4565 (S.D. Tex.). Rosen Co-Lead Counsel.

Taylor v. The Chemours Company, No. 24-cv-361-RGA (D. Del.). Rosen Lead Counsel.

Nowakowski v. AXT, Inc., No. 24-cv-2778-MMC (N.D. Cal.). Rosen Lead Counsel.

In re Intel Corp. Sec. Litig., No. 24-cv-2683-TLT (N.D. Cal.). Rosen Co-Lead Counsel.

Yarborough v. Ardelyx, Inc., No. 24-cv-12119-LTS (D. Mass.). Rosen Lead Counsel.

Nelson v. Sun Communities, Inc., No. 24-cv-13314-MAG (E.D. Mich.). Rosen Lead Counsel.

Liberato v. Grocery Outlet Holding Corp., No. 4:25-cv-957-JST (N.D. Cal.). Rosen Lead Counsel.

Drott v. Sana Biotechnology, Inc., No. 2:25-cv-512-BJR (W.D. Wash.). Rosen Co-Lead Counsel.

Evangelista v. Late Stage Asset Management, LLC, No. 1:24-cv-5292 (KAM) (MMH) (E.D.N.Y.). Rosen Lead Counsel.

Alvarez v. Pacira Biosciences, Inc., No. 2:25-cv-322-SRC-CLW (D.N.J.). Rosen Lead Counsel.

Lucid Alternative Fund LP v. Elastic N.V., No. 25-cv-785 (RPK)(SDE) (E.D.N.Y.). Rosen Co-Lead Counsel.

Britton v. Polestar Automotive Holdings UK PLC, No. 25-CV-840-CCC-JBC (D.N.J.). Rosen Co-Lead Counsel.

Karas v. Newmont Corp., No. 25-cv-341-DDD-KAS (D. Colo.). Rosen Co-Lead Counsel.

Cai v. Visa, Inc., No. 24-CV-8220-NW (N.D. Cal.). Rosen Lead Counsel.

Buathongsri v. Zenas Biopharma, Inc., No. 25-cv-10988-FDS-JDH (D. Mass.). Rosen Lead Counsel.

In re Micron Technology, Inc. Sec. Litig., No. 25-cv-191-BLW (D. Idaho). Rosen Co-Lead Counsel.

Weber v. Nextracker, Inc., No. 24-cv-9467-PCP (N.D. Cal.). Rosen Lead Counsel.

Ishak v. WM Technology, Inc., No. 24-cv-8959 (C.D. Cal.). Rosen Lead Counsel.

Collura v. Warner Bros. Discovery Inc., No. 24-cv-9027 (KPF) (S.D.N.Y.). Rosen Co-Lead Counsel.

Banurs v. Li Auto, Inc., No. 24-cv-3470 (DG)(VMS) (E.D.N.Y.). Rosen Lead Counsel.

In re Rocket Pharms. Sec. Litig., No. 3:25-cv-10049-ZNQ-TJB (D.N.J.). Rosen Co-Lead Counsel.

Norrman v. KBR, Inc., No. 25-cv-4464 (S.D. Tex.). Rosen Lead Counsel.

In re: Iovance Biotherapeutics, Inc. Sec. Litig., No. 25-cv-4177-EKL (N.D. Cal.). Rosen Lead Counsel.

Lee v. Quantum Corp., No. 25-cv-2770-PAB-CYC (D. Colo.). Rosen Lead Counsel.

O'Connor v. CTO Realty Growth, Inc., No. 25-cv-1516-AGM-DCI (M.D. Fla.). Rosen Co-Lead Counsel.

Jboor v. Replimune Group, Inc., No. 25-cv-12085-JEK (D. Mass.). Rosen Lead Counsel.

Pacella v. Hesai Group Inc., No. 24-cv-866 (CM) (S.D.N.Y.). Rosen Lead Counsel.

Hickman v. Flywire Corp., No. 25-cv-4110 (FB) (LKE) (E.D.N.Y.). Rosen Co-Lead Counsel.

Johnson v. Sable Offshore Corp., No. 25-cv-6869-SVW (C.D. Cal.). Rosen Lead Counsel.

Tamraz v. Reddit, Inc., No. 25-cv-5144-JD (N.D. Cal.). Rosen Lead Counsel.

Southeastern Pennsylvania Transportation Authority v. The Bancorp, No. 25-cv-326-JLH-LDH. Rosen Lead Counsel.

Thomas v. Telix Pharms., No. 25-CV-2299-JRO-MG (S.D. Ind.). Rosen Co-Lead Counsel.

Duong v. Gauzy Ltd., No. 25-cv-10179 (VM) (S.D.N.Y.). Rosen Co-Lead Counsel.

Reed v. Freeport- McMoran, No. 2-25-cv-04243 (D. Ariz.). Rosen Lead Counsel.

Linkedto Partners LLC v. DeFi Techs. Inc., No. 25-cv-6637 (NRM)(SDE) (E.D.N.Y). Rosen Lead Counsel.

EXHIBIT 12

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

**DECLARATION OF EX KANO S. SAMS II, ESQ. IN SUPPORT OF LEAD COUNSEL'S
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
LITIGATION EXPENSES FILED ON BEHALF OF
GLANCY PRONGAY WOLKE & ROTTER LLP**

I, Ex Kano S. Sams II, declare as follows:

1. I am a partner at the law firm Glancy Prongay Wolke & Rotter LLP (“GPWR”) (f/k/a Glancy Prongay & Murray LLP (*see* ECF No. 207)).¹ GPWR is one of the Court-appointed Lead Counsel in the above-captioned action (the “Action”). ECF No. 22. I submit this declaration in support of Lead Counsel’s application for an award of attorneys’ fees in connection with services rendered in the Action, as well as for reimbursement of litigation expenses incurred in connection with the Action. I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. As Lead Counsel, GPWR was involved in all aspects of the litigation. Among other things, GPWR, in conjunction with co-Lead Counsel The Rosen Law Firm P.A.: (a) negotiated an agreement on the appointment of Lead Plaintiffs in the Action; (b) conducted extensive research and investigation before filing the amended complaint; (c) opposed Defendants’ motion to dismiss the amended complaint; (d) evaluated the Court’s ruling on Defendants’ motion to dismiss the amended complaint and conducted additional comprehensive research and investigation before filing a Second Amended Complaint (“SAC”); (e) opposed Defendants’ motion to dismiss the SAC; (f) evaluated the Court’s ruling on Defendants’ motion to dismiss the SAC; (g) moved for reconsideration of certain aspects of the Court’s ruling on Defendants’ motion to dismiss the SAC and moved for certification of the Court’s order and entry of judgment on behalf of Plaintiffs whose claims the Court dismissed; (h) obtained, reviewed, and analyzed approximately 10,615 documents (totaling roughly 68,700 pages) from Defendants; (i) obtained, reviewed, and analyzed approximately 1,735 documents (totaling roughly 32,925 pages) from third parties; (j) deposed

¹ Unless otherwise defined, all capitalized terms herein have the same meanings as set forth in the Stipulation and Agreement of Settlement dated November 3, 2025. ECF No. 198-1.

eight fact witnesses, including two Individual Defendants: (k) defended and/or attended the depositions of four plaintiffs, one fact witness, and one of Plaintiffs' experts; (l) propounded three sets of requests for production of documents, four sets of interrogatories, and one set of requests for admissions (containing 97 requests); (m) served six subpoenas *duces tecum* on various third parties; (n) moved for leave to file a third amended complaint to add Montgomery Brantley as a named plaintiff; (o) prepared responses for, and produced documents related to, two sets of requests for production of documents upon Plaintiffs; (p) produced approximately 85,050 pages of documents to Defendants; (q) responded to Defendants' interrogatories; (r) filed a voluminous motion for class certification and reply in support of the motion; (s) moved for leave to file a fourth amended complaint to allege additional scienter claims with respect to Virgin Galactic CEO Michael Colglazier; (t) engaged in extensive settlement discussions and participated in a full-day mediation session; and (u) negotiated an agreement to settle the Action and the Stipulation of Settlement and the exhibits thereto.

3. The schedule attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by attorneys and professional support staff of my firm who, from inception of the Action through and including May 20, 2026, billed ten or more hours to the Action, and the lodestar calculation for those individuals based on my firm's current billing rates. For personnel who are no longer employed by my firm, the lodestar calculation is based upon the billing rates for such personnel in his or her final year of employment by my firm. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by my firm. Pursuant to Court Order, these records are being submitted to the Court under seal for its *in camera* review. See Docket Orders dated May 6 and 7, 2026.

4. I am the partner who oversaw or conducted the day-to-day activities in the Action, and I reviewed these daily time records in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the records as well as the necessity for, and reasonableness of, the time committed to the litigation. As a result of this review, I made reductions to certain of my firm's time entries such that the time included in Exhibit A reflects that exercise of billing judgment. Based on this review and the adjustments made, I believe that the time of GPWR attorneys and staff reflected in Exhibit A was reasonable and necessary for the effective and efficient prosecution and resolution of the Action. No time expended on the application for fees and reimbursement of expenses has been included.

5. The hourly rates for the attorneys and professional support staff in my firm included in Exhibit A are consistent with the rates approved by courts in other securities or shareholder litigation when conducting a lodestar cross-check.

6. The total number of hours reflected in Exhibit A is 6,710 hours. The total lodestar reflected in Exhibit A is \$5,850,871, consisting of \$5,703,462.50 for attorneys' time and \$147,408.50 for professional support staff time.

7. My firm's lodestar figures are based upon the firm's billing rates, which rates do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in my firm's billing rates.

8. As detailed in Exhibit B, my firm is seeking reimbursement of a total of \$735,594.18 in expenses incurred in connection with the prosecution of this Action. Pursuant to Court Order, documentation supporting certain categories of Exhibit B is being submitted to the Court under seal for its *in camera* review. See Docket Orders dated May 6 and 7, 2026

9. The litigation expenses incurred in the Action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. The expenses reflected in Exhibit B are the expenses actually incurred by my firm.

10. Attached hereto as Exhibit C is a brief biography of GPWR, including the attorneys who were involved in the Action.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on May 26, 2026, in Los Angeles, California.

/s/ Ex Kano S. Sams II

Ex Kano S. Sams II

EXHIBIT A

Lavin v. Virgin Galactic Holdings, Inc., et al.,
Case No. 1:21-cv-03070-NRM-TAM

Glancy Prongay Wolke & Rotter LLP

LODESTAR REPORT
FROM INCEPTION THROUGH MAY 20, 2026

TIMEKEEPER/CASE	STATUS	HOURS	RATE	LODESTAR
ATTORNEYS:				
Joseph D. Cohen	Partner	83.25	\$1,390.00	\$115,717.50
Ex Kano S. Sams II	Partner	1,425.50	\$1,350.00	\$1,924,425.00
Kevin F. Ruf	Partner	158.25	\$1,450.00	\$229,462.50
Kara Wolke	Partner	527.60	\$1,250.00	\$659,500.00
Jason Krajcer	Partner	94.50	\$1,250.00	\$118,125.00
Natalie S. Pang	Partner	1,208.00	\$900.00	\$1,087,200.00
Raymond Sulentic	Partner	22.00	\$1,025.00	\$22,550.00
Holly A. Heath	Associate	98.80	\$600.00	\$59,280.00
Rebecca Dawson	Associate	25.80	\$575.00	\$14,835.00
Lisa Holman	Associate	644.60	\$850.00	\$547,910.00
Amir Soleimanpour	Associate	62.00	\$500.00	\$31,000.00
Tania D. Horton	Staff Attorney	668.80	\$475.00	\$317,680.00
Felicia M. Gordon	Staff Attorney	35.00	\$475.00	\$16,625.00
Diarra Porter	Staff Attorney	742.30	\$425.00	\$315,477.50
Uju Ezejiofor Obasi	Staff Attorney	541.50	\$450.00	\$243,675.00
TOTAL ATTORNEY	TOTAL	6,337.90		\$5,703,462.50
PARALEGALS:				
Harry Kharadjian	Senior Paralegal	92.50	\$390.00	\$36,075.00
Paul Harrigan	Senior Paralegal	40.60	\$325.00	\$13,195.00
Zabella Moore	Senior Paralegal	17.80	\$390.00	\$6,942.00
Alexia Shiri	Senior Paralegal	44.30	\$390.00	\$17,277.00
Michelle Mejia	Paralegal	19.00	\$375.00	\$7,125.00
Jack Ligman	Research Analyst	15.80	\$450.00	\$7,110.00
John D. Belanger	Research Analyst	42.80	\$365.00	\$15,622.00
Michaela Ligman	Research Analyst	74.40	\$450.00	\$33,480.00
Gabrielle Zavaleta	Research Analyst	24.90	\$425.00	\$10,582.50
TOTAL PARALEGAL	TOTAL	372.10		\$147,408.50
TOTAL LODESTAR	TOTAL	6,710.00		\$5,850,871.00

EXHIBIT B

Lavin v. Virgin Galactic Holdings, Inc., et al.,
Case No. 1:21-cv-03070-NRM-TAM

Glancy Prongay Wolke & Rotter LLC

EXPENSE REPORT

FROM INCEPTION THROUGH MAY 20 2026

CATEGORY OF EXPENSE	AMOUNT PAID
CONFERENCE ROOMS FOR DEPOSITION IN BRITISH VIRGIN ISLANDS	\$4,400.00
COURIER AND SPECIAL POSTAGE	\$2,098.68
COURT FILING FEES	\$1,000.00
DOCUMENT MANAGEMENT	\$14,890.31
EXPERTS	\$537,347.74
INVESTIGATIONS	\$48,299.76
MEDIATION SERVICES	\$12,723.86
ONLINE RESEARCH	\$41,250.18
PHOTOIMAGING	\$770.81
SERVICE OF PROCESS	\$1,237.71
TRANSCRIPTS	\$48,175.31
TRAVEL AIRFARE	\$9,116.61
TRAVEL AUTO	\$2,041.80
TRAVEL HOTELS	\$10,204.77
TRAVEL MEALS	\$1,951.64
TRAVEL PARKING	\$85.00
Grand Total	\$735,594.18

EXHIBIT C

Glancy Prongay Wolke & Rotter LLC

FIRM RESUME



**GLANCY
PRONGAY
WOLKE &
ROTTER**

Los Angeles | New York | San Diego

Firm Resume

Glancy Prongay Wolke & Rotter LLP (the “Firm”) has represented investors, consumers and employees for over 35 years. Headquartered in Los Angeles, with offices in New York City and San Diego, the Firm has successfully prosecuted class action cases and complex litigation in federal and state courts throughout the country. As Lead Counsel, Co-Lead Counsel, or as a member of Plaintiffs’ Counsel Executive Committees, the Firm’s attorneys have recovered billions of dollars for parties wronged by corporate fraud, antitrust violations and malfeasance.

The Firm is recognized as one of the premier plaintiffs’ firms in the country. In 2025, the Firm was named one of Law360’s Securities Groups of the Year and ranked second-highest in total investor recoveries by Institutional Shareholder Services Securities Class Action Services in its *Top 50 Plaintiff Law Firms 2025* report. The Firm has also been recognized as a Top Litigation Boutique in California by the *Daily Journal* in 2018 and 2025. RiskMetrics Group’s Institutional Shareholder Services unit has recognized the Firm as one of the top plaintiffs’ law firms in the United States in its Securities Class Action Services report for every year since the inception of the report in 2003. The Firm’s work has been featured in major outlets including *The Wall Street Journal*, *The New York Times*, and the *Los Angeles Times*. The Firm litigates tenaciously on behalf of its clients to produce significant recoveries and promote lasting corporate reform.

The Firm’s integrity and success originate from its attorneys, who are among the brightest and most experienced in the field. The Firm’s distinguished litigators have an unparalleled track record of investigating and prosecuting corporate wrongdoing. The Firm is respected for both the zealous advocacy with which we represent our clients’ interests as well as the highly-professional and ethical manner by which we achieve results. We are ideally positioned to pursue securities, antitrust, consumer, and derivative litigation on behalf of our clients.

SECURITIES CLASS ACTION SETTLEMENTS

Appointed as Lead or Co-Lead Counsel by judges throughout the United States, Glancy Prongay Wolke & Rotter has achieved significant recoveries for class members in numerous securities class actions, including:

In re Alibaba Group Holding Ltd. Securities Litigation, Case No. 1:20-cv-09568-GBD-JW (S.D.N.Y.), in which the Firm served as sole Lead Counsel and following four years of hard-fought litigation, achieved a \$433.5 million settlement for Alibaba investors. The settlement was the highest securities class action settlement of 2025, according to NERA, a prominent national economic consulting firm. The settlement is also the largest securities class action settlement ever attained against a Chinese issuer and ranks among the fifty largest U.S. securities class action settlements of all time, as tracked by Institutional Shareholder Services (ISS).

In re ViacomCBS Inc., Supreme Court of the State of New York, County of New York: Commercial Division, before Justice Andrew Borrok, Index No. 654959/2021. On August 5, 2025, as co-lead counsel Glancy Prongay Wolke & Rotter secured a \$120 million settlement for ViacomCBS Inc. investors. The settlement resolves investors’ claims that certain underwriters of the March 2021 public offering of Viacom Class B and Viacom convertible preferred stock violated the Securities Act of 1933 by issuing false and misleading statements and failing to disclose that the underwriters had substantial holdings of Viacom common stock as collateral for a highly leveraged, highly concentrated portfolio owned by Archegos Capital Management LP and that the underwriters could (and did) sell those holdings when Archegos collapsed.

In re Mercury Interactive Corporation Securities Litigation, Case No. 05-3395-JF (N.D. Cal.), in which the Firm served as Co-Lead Counsel and achieved a settlement valued at over \$117 million.

In re Real Estate Associates Limited Partnership Litigation, Case No. 98-cv-7035-DDP (C.D. Cal.), in which the Firm served as local counsel and plaintiffs achieved a \$184 million jury verdict after a complex six week trial in Los Angeles, California and later settled the case for \$83 million.

In re Yahoo! Inc. Securities Litigation, Case No. 5:17-cv-00373-LHK (N.D. Cal.), in which the Firm served as Co-Lead Counsel and achieved an \$80 million settlement.

The City of Farmington Hills Employees Retirement System v. Wells Fargo Bank, N.A., Case No. 10-cv-04372-DWF/JJG (D. Minn.), in which the Firm served as Co-Lead Counsel and achieved a settlement valued at \$62.5 million.

Shah v. Zimmer Biomet Holdings, Inc., Case No. 3:16-cv-815-PPS-MGG (N.D. Ind.), a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$50 million.

Schleicher v. Wendt, (Conseco Securities Litigation), Case No. 02-cv-1332-SEB (S.D. Ind.), a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of over \$41 million.

Robb v. Fitbit, Inc., Case No. 3:16-cv-00151 (N.D. Cal.), a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$33 million.

Yaldo v. Airtouch Communications, State of Michigan, Wayne County, Case No. 99-909694-CP, in which the Firm served as Co-Lead Counsel and achieved a settlement valued at over \$32 million for defrauded consumers.

Lapin v. Goldman Sachs, Case No. 03-cv-0850-KJD (S.D.N.Y.), a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$29 million.

In re Heritage Bond Litigation, Case No. 02-ML-1475-DT (C.D. Cal.), where as Co-Lead Counsel, the Firm recovered in excess of \$28 million for defrauded investors.

Mild v. PPG Industries, Inc., Case No. 18-cv-04231 (C.D. Cal.), a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$25 million.

Davis v. Yelp, Inc., Case No. 18-cv-0400 (N.D. Cal.), a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$22.5 million.

In re ECI Telecom Ltd. Securities Litigation, Case No. 01-cv-913-A (E.D. Va.), in which the Firm served as sole Lead Counsel and recovered almost \$22 million for defrauded ECI investors.

In re Sesen Bio, Inc. Securities Litigation, Case No. 21-cv-07025 (S.D.N.Y.), a securities fraud class action, in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$21 million.

In re Flowers Foods, Inc. Securities Litigation, Case No. 7:16-cv-00222 (M.D. Ga.), a securities fraud class action, in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$21 million.

In re Live Nation Entertainment Inc., Case No. 23-cv-06343-KK-AS (C.D. Cal.). On August 28, 2025, the Firm, as co-Class Counsel, secured a \$20 million settlement on behalf of Live Nation Entertainment Inc. investors.

Senn v. Sealed Air Corporation, Case No. 03-cv-4372-DMC (D.N.J.), a securities class action, in which the Firm acted as Co-Lead Counsel for the Class and achieved a settlement of \$20 million.

In re Gilat Satellite Networks, Ltd. Securities Litigation, Case No. 02-cv-1510-CPS (E.D.N.Y.), a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$20 million.

In re Lumenis, Ltd. Securities Litigation, Case No. 02-cv-1989-DAB (S.D.N.Y.), in which the Firm served as Co-Lead Counsel and achieved a settlement valued at over \$20 million.

In re Penn West Petroleum, Ltd. Securities Litigation, Case No. 14-cv-06046-JGK (S.D.N.Y.), a securities fraud class action in which the Firm achieved a \$19 million settlement for the U.S. shareholder class as part of a \$39 million global settlement.

Wilson v. LSB Industries, Inc., Case No. 15-cv-07614 (S.D.N.Y.), a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$18.45 million.

In re Infonet Services Corporation Securities Litigation, Case No. CV 01-10456-NM (C.D. Cal.), in which as Co-Lead Counsel, the Firm achieved a settlement of \$18 million.

Pierrelouis v. Gogo Inc., Case No. 18-cv-04473 (N.D. Ill.), a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$17.3 million.

Macovski v. Groupon, Inc., Case No. 20-cv-02581 (N.D. Ill.), a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement of \$13.5 million.

In re Musicmaker.com Securities Litigation, Case No. 00-cv-02018-CAS (C.D. Cal.), a securities fraud class action in which the Firm was sole Lead Counsel for the Class and recovered in excess of \$13 million.

Taft v. Ackermans (KPNQwest Securities Litigation), Case No. 02-cv-07951-PKL (S.D.N.Y.), a securities fraud class action in which the Firm served as Co-Lead Counsel for the Class and achieved a settlement worth \$11 million.

Derr v. RA Medical Systems, Inc., Case No. 19-cv-01079 (S.D. Cal.), a securities fraud class action in which the Firm served as Lead Counsel for the Class and achieved a settlement of \$10 million.

ANTITRUST PRACTICE GROUP AND ACHIEVEMENTS

Glancy Prongay Wolke & Rotter's Antitrust Practice Group focuses on representing individuals and entities that have been victimized by unlawful monopolization, price-fixing, market allocation, and other anti-competitive conduct. The Firm has prosecuted significant antitrust cases and has helped public health and welfare funds, individuals, and businesses recover billions of dollars in damages as well as injunctive relief for violations of antitrust and commodities laws throughout the country. The Firm has served, or is currently serving, as Lead Counsel, Co-Lead Counsel or Class Counsel in a substantial number of antitrust class actions, including:

In re Nasdaq Market-Makers Antitrust Litigation, USDC Southern District of New York, Case No. 94 C 3996-RWS, MDL Docket No. 1023, a landmark antitrust lawsuit in which the Firm filed the first complaint against all of the major NASDAQ market makers and served on Plaintiffs' Counsel's Executive Committee in a case that recovered \$900 million for investors.

Sullivan v. DB Investments, USDC District of New Jersey, Case No. No. 04-cv-2819, where the Firm served as Co-Lead Settlement Counsel in an antitrust case against DeBeers relate to the pricing of diamonds that settled for \$295 million.

In re Korean Air Lines Antitrust Litig., MDL No. 07-0189 (C.D. Cal.), where the Firm served as Co-Lead Counsel in a case related to fixing of prices for airline tickets to Korea that settled for \$86 million.

In re Zetia Antitrust Litigation, Case No. 2:18-md-02836 (E.D. Va.), where the Firm, representing a major health and welfare fund, played a significant role in achieving a settlement of \$70 million.

In re Aggrenox Antitrust Litig., Case No. 14-cv-2516 (D. Conn.), where the Firm played a major role in achieving a settlement of \$54 million.

In re Solodyn Antitrust Litig., Case No. MDL 2503 (D. Mass.), where the Firm played a major role in achieving a settlement of \$43 million.

In re Urethane Chemical Antitrust Litig., USDC District of Kansas, Case No. MDL 1616, where the Firm served as Co-Lead counsel in an antitrust price fixing case that settled \$33 million.

In re Western States Wholesale Natural Gas Litig., MDL No. 1566 (D. Nev.), where the Firm served as Class Counsel in an antitrust price fixing case that settled \$25 million.

In re Generic Pharmaceuticals Pricing Antitrust Litig., Case No. 16-md-2427 (E.D. Penn), where the Firm is representing a major Health and Welfare Fund in a case against a number of generic drug manufacturers for price fixing generic drugs.

In re Actos End Payor Antitrust Litig., Case No. 13-cv-9244 (S.D.N.Y.), where the Firm is serving on Plaintiffs' Executive Committee.

In re Heating Control Panel Direct Purchaser Action, Case No. 12-md-02311 (E.D. Mich.), representing a recreational vehicle manufacturer in a price-fixing class action involving direct purchasers of heating control panels.

In re Instrument Panel Clusters Direct Purchaser Action, Case No. 12-md-02311 (E.D. Mich.), representing a recreational vehicle manufacturer in a price-fixing class action involving direct purchasers of instrument panel clusters.

OTHER NOTABLE ACHIEVEMENTS

Glancy Prongay Wolke & Rotter has been responsible for obtaining favorable appellate opinions which have broken new ground in the class action or securities fields, or which have promoted shareholder rights in prosecuting these actions. The Firm successfully argued the appeals in a number of cases:

Headed by Firm attorney Kara Wolke, the Firm served as additional plaintiffs' counsel in *Christine Asia Co. Ltd., et al. v. Jack Yun Ma et al. ("Alibaba")*, 1:15-md-02631 (SDNY), a securities class action on behalf of investors alleging violations of the Securities Exchange Act of 1934 in connection with Alibaba's historic \$25 billion IPO, the then-largest IPO in history. After hard-fought litigation, including a successful appeal to the Second Circuit and obtaining class certification, the case settled for \$250 million.

In *Smith v. L'Oreal*, 39 Cal.4th 77 (2006), Firm partner Kevin Ruf established ground-breaking law when the California Supreme Court agreed with the Firm's position that waiting penalties under the California Labor Code are available to *any* employee after termination of employment, regardless of the reason for that termination.

Spearheaded by Firm attorney Kevin Ruf, the Firm served as Co-Lead Counsel for a class of drivers misclassified as independent contractors in the landmark case *Lee v. Dynamex*, Case No. BC332016 (Super. Ct. of Cal), which made new law for workers' rights in the California Supreme Court. The *Dynamex* decision altered 30 years of California law and established a new definition of employment that brings more workers within the protections of California's Labor Code. The California legislature, in response to the *Dynamex* decision, promulgated AB5, a statute that codifies the law of the *Dynamex* case and expands its reach.

OUR TEAM

PARTNERS

LEE ALBERT has over fifteen years of trial experience in both jury and non-jury cases and arbitrations and has argued before the Supreme and Superior Courts of Pennsylvania on numerous occasions. Mr. Albert has represented a national health care provider at trial obtaining injunctive relief in federal court to enforce a five-year contract not to compete on behalf of a national health care provider and injunctive relief on behalf of an undergraduate university.

Currently, Mr. Albert represents clients in complex litigation matters including violations of federal and state antitrust and securities laws, mass tort/product liability and unfair and deceptive trade practices. Some of Mr. Albert's current major cases include *In Re Automotive Wire Harness Systems Antitrust Litigation* (E.D. Mich.); *In Re Heater Control Panels Antitrust Litigation* (E.D. Mich.); *Kleen Products, et al. v. Packaging Corp. of America* (N.D. Ill.); and *In re Class 8 Transmission Indirect Purchaser Antitrust Litigation* (D. Del.).

Previously, Mr. Albert had a significant role in the following cases: *In re Zetia Antitrust Litigation*, No. 18-md-2836 (E.D. Va.) (\$70 million settlement); *Marine Products Antitrust Litigation* (C.D. Cal.); *Baby Products Antitrust Litigation* (E.D. Pa.); *In re ATM Fee Litigation* (N.D. Cal.); *In re Canadian Car Antitrust Litigation* (D. Me.); *In re Broadcom Securities Litigation* (C.D. Cal.); and has worked on *In re Avandia Marketing, Sales Practices and Products Liability Litigation* (E.D. Pa.); *In re Ortho Evra Birth Control Patch Litigation* (N.J. Super. Ct.); *In re AOL Time Warner, Inc. Securities Litigation* (S.D.N.Y.); *In re WorldCom, Inc. Securities Litigation* (S.D.N.Y.); and *In re Microsoft Corporation Massachusetts Consumer Protection Litigation* (Mass. Super. Ct.).

Mr. Albert received his B.S. and M.S. degrees from Temple University and Arcadia University in 1975 and 1980, respectively, and received his J.D. degree from Widener University School of Law in 1986. He is admitted to the bars of the Commonwealth of Pennsylvania, the State of New Jersey, and the United States District Courts for the Eastern District of Pennsylvania and the District of New Jersey in 1986. After law school, Mr. Albert spent several years working as a civil litigator in Philadelphia, PA.

BRIAN D. BROOKS has spent most of his 20+ years as a litigator prosecuting antitrust cases against brand and generic drug manufacturers for monopolizing or otherwise restraining trade in the market for their drugs, typically by illegally interfering with the regulatory process for approval

and launch of generics. Since joining the Firm, he has prosecuted these generic suppression cases on behalf of classes of “end-payor” plaintiffs, which include individuals or businesses who bought the drug at the end of the distribution chain for the purpose of consumption by themselves or their members.

Among Mr. Brooks’s successes in his current role is *In re Zetia Antitrust Litigation*, No. 18-md-2836 (E.D. Va.), which resulted in a global settlement of \$600 million, including a \$70 million settlement for the end-payor class. Mr. Brooks played an integral role in the *Zetia* team from discovery through final trial preparations. Currently, Mr. Brooks is leading the prosecution of *In re Vascepa Antitrust Litigation*, No. 3:21-cv-12061 (D.N.J.), in which drug manufacturer Amarin, Inc. is alleged to have suppressed generic competition for its cardiovascular drug Vascepa by cornering the market for the active pharmaceutical ingredient necessary to manufacture generic versions of the drug. The Firm was appointed co-lead counsel for the end-payor class, and Mr. Brooks is leading the prosecution for the end payors.

Despite this intense focus on generic suppression cases, Mr. Brooks has gained extensive experience litigating matters in other areas, including a direct purchaser antitrust case. He has also investigated and litigated numerous securities and consumer class actions, and has represented businesses in individual litigation. His past business clients include a fintech startup, a regional furniture store, a chain of gas stations, and a commercial tree nursery.

Mr. Brooks received his J.D. from Washington and Lee School of Law in 2002, where he was a staff writer for the *Environmental Law Digest* and clerked for the Alderson Legal Assistance Program. He earned his B.A. in Sociology from Northwestern State University of Louisiana while serving in the Louisiana Army National Guard.

Mr. Brooks is admitted to practice in all state courts in New York and Louisiana, as well as the United States District Courts for the Southern and Eastern Districts of New York; the Eastern and Western Districts of Louisiana; and the Northern District of Illinois.

JOSEPH D. COHEN has extensive complex civil litigation experience, and currently oversees the firm’s settlement department, negotiating, documenting and obtaining court approval of the firm’s securities, merger and derivative settlements.

Prior to joining the Firm, Mr. Cohen successfully prosecuted numerous securities fraud, consumer fraud, antitrust and constitutional law cases in federal and state courts throughout the country. Cases in which Mr. Cohen took a lead role include: *Jordan v. California Dep’t of Motor Vehicles*, 100 Cal. App. 4th 431 (2002) (complex action in which the California Court of Appeal held that California’s Non-Resident Vehicle \$300 Smog Impact Fee violated the Commerce Clause of the United States Constitution, paving the way for the creation of a \$665 million fund and full refunds, with interest, to 1.7 million motorists); *In re Geodyne Res., Inc. Sec. Litig.* (Harris Cty. Tex.) (settlement of securities fraud class action, including related litigation, totaling over \$200 million); *In re Cmty. Psychiatric Centers Sec. Litig.* (C.D. Cal.) (settlement of \$55.5 million was obtained from the company and its auditors, Ernst & Young, LLP); *In re McLeodUSA Inc., Sec. Litig.* (N.D. Iowa) (\$30 million settlement); *In re Arakis Energy Corp. Sec. Litig.* (E.D.N.Y.) (\$24 million settlement); *In re Metris Cos., Inc., Sec. Litig.* (D. Minn.) (\$7.5 million settlement); and *Freedman v. Maspeth Fed. Loan and Savings Ass’n*, (E.D.N.Y.) (favorable resolution of issue of first impression under RESPA resulting in full recovery of improperly assessed late fees).

In addition, Mr. Cohen was previously the head of the settlement department at Bernstein Litowitz Berger & Grossmann LLP. While at BLB&G, Mr. Cohen had primary responsibility for overseeing the team working on the following settlements, among others: *In Re Merck & Co., Inc. Sec., Deriv. & "ERISA" Litig.* (D.N.J.) (\$1.062 billion securities class action settlement); *New York State Teachers' Ret. Sys. v. General Motors Co.* (E.D. Mich.) (\$300 million securities class action settlement); *In re JPMorgan Chase & Co. Sec. Litig.* (S.D.N.Y.) (\$150 million settlement); *Dep't of the Treasury of the State of New Jersey and its Division of Inv. v. Cliffs Natural Res. Inc., et al.* (N.D. Ohio) (\$84 million securities class action settlement); *In re Penn West Petroleum Ltd. Sec. Litig.* (S.D.N.Y.) (\$19.76 million settlement).

CHRISTOPHER FALLON focuses on securities, consumer, and antitrust litigation. As a Certified E-Discovery Specialist through the Association of Certified E-Discovery Specialists (ACEDS), Mr. Fallon manages all aspects of the fact and expert discovery stages of litigation.

Mr. Fallon earned his J.D. and a Certificate in Dispute Resolution from Pepperdine Law School in 2004. While attending law school, Christopher worked at the Pepperdine Special Education Advocacy Clinic and interned with the Rhode Island Office of the Attorney General. Prior to attending law school, he graduated from Boston College with a Bachelor of Arts in Economics and a minor in Irish Studies, then served as Deputy Campaign Finance Director on a U.S. Senate campaign.

LIONEL Z. GLANCY, a graduate of University of Michigan Law School, is the founding partner of the Firm. After serving as a law clerk for United States District Judge Howard McKibben, he began his career as an associate at a New York law firm concentrating in securities litigation. Thereafter, he started a boutique law firm specializing in securities litigation, and other complex litigation, on behalf of investors and consumers. Mr. Glancy has established a distinguished career in the field of securities litigation over the last thirty years, having appeared and been appointed lead counsel on behalf of aggrieved investors in securities class action cases throughout the country. He has appeared and argued before dozens of district courts and a number of appellate courts. His efforts have resulted in the recovery of hundreds of millions of dollars in settlement proceeds for huge classes of shareholders. Well known in securities law, he has lectured on its developments and practice, including having lectured before Continuing Legal Education seminars and law schools.

Mr. Glancy earned his undergraduate degree in political science in 1984 and his Juris Doctor degree in 1986, both from the University of Michigan. He was admitted to practice in California in 1988, and in Nevada and before the U.S. Court of Appeals, Ninth Circuit, in 1989.

MARC L. GODINO manages the Firm's consumer class action department and has successfully prosecuted securities, derivative, merger & acquisition, and consumer cases throughout the country in both state and federal court.

Recently, Mr. Godino obtained a jury verdict against American Honda Motor Company, Inc. of over \$1,000,000 on behalf of an Illinois class of Honda car owners regarding a defective engine component. *Quackenbush et al. v. American Honda Motor Company, Inc. et al.*, Case No. 3:20-cv-05599-WHA. Subsequently, Mr. Godino defeated Honda's attempt to reverse the verdict in the 9th Circuit Court of Appeals. *Quackenbush et al. v. American Honda Motor Company, Inc. et al.*, 2025 WL 1009273 (9th Cir. April 4, 2025).

Mr. Godino's other successes with the Firm include: *Good Morning To You Productions Corp., et al., v. Warner/Chappell Music, Inc., et al.*, Case No. 13-04460 (C.D. Cal.) (In this highly publicized case that attracted world-wide attention, Plaintiffs prevailed on their claim that the song "Happy Birthday" should be in the public domain and achieved a \$14,000,000 settlement to class members who paid a licensing fee for the song); *Pappas v. Naked Juice Co. of Glendora, Inc.*, Case No. 11-08276 (C.D. Cal.) (\$9,000,000 settlement plus injunctive relief); *Astiana v. Kashi Company*, Case No. 11-1967 (S.D. Cal.) (\$5,000,000 settlement); *In re Magma Design Automation, Inc. Securities Litigation*, Case No. 05-2394 (N.D. Cal.) (\$13,500,000 settlement); *Kelly v. Phiten USA, Inc.*, Case No. 11-67 (S.D. Iowa) (\$3,200,000 settlement plus injunctive relief); *Esslinger, et al. v. HSBC Bank Nevada, N.A.*, Case No. 10-03213 (E.D. Pa.) (\$23,500,000 settlement); *In re Discover Payment Protection Plan Marketing and Sales Practices Litigation*, Case No. 10-06994 (\$10,500,000 settlement); *In Re: Bank of America Credit Protection Marketing and Sales Practices Litigation*, Case No. 11-md-02269 (N.D. Cal.) (\$20,000,000 settlement). *Castillo, et al., v. Seagate Technology LLC*, Case No. 16-01958 (N.D. Cal.) (settlement provides up to \$3,500 to class members); *Small v. University Medical Center of Southern Nevada*, Case No. 13-00298 (D. Nev.) (\$4,250,000.000 settlement); *Reniger, et al., v. Hyundai Motor America, et al.*, Case No. 14-03612 (N.D. Cal.) (no cap reimbursement program and free software update); *In re: Michaels Stores, Inc. Fair Credit Reporting Act Litigation*, Case no. 15-05504 (D.N.J.) (\$4 million settlement).

MATTHEW M. HOUSTON, a partner in the Firm's New York office, has substantial courtroom experience involving complex actions in federal and state courts throughout the country. Mr. Houston was co-lead trial counsel in one the few ERISA class action cases taken to trial asserting breach of fiduciary duty claims against plan fiduciaries, *Brieger et al. v. Tellabs, Inc.*, No. 06-CV-01882 (N.D. Ill.), and has successfully prosecuted many ERISA actions, including *In re Royal Ahold N.V. Securities and ERISA Litigation*, Civil Action No. 1:03-md-01539. Mr. Houston has been one of the principal attorneys litigating claims in multi-district litigation concerning employment classification of pickup and delivery drivers and primarily responsible for prosecuting ERISA class claims resulting in a \$242,000,000 settlement; *In re FedEx Ground Package Inc. Employment Practices Litigation*, No. 3:05-MD-527 (MDL 1700). Mr. Houston recently presented argument before the Eleventh Circuit Court of Appeals on behalf of a class of Florida pickup and delivery drivers obtaining a reversal of the lower court's grant of summary judgment. Mr. Houston represented the interests of Nevada and Arkansas drivers employed by FedEx Ground obtaining significant recoveries on their behalf. Mr. Houston also served as lead counsel in multi-district class litigation seeking to modify insurance claims handling practices; *In re UnumProvident Corp. ERISA Benefits Denial Actions*, No. 1:03-cv-1000 (MDL 1552).

Mr. Houston has played a principal role in numerous derivative and class actions wherein substantial benefits were conferred upon plaintiffs: *In re: Groupon Derivative Litigation*, No. 12-cv-5300 (N.D. Ill. 2012) (settlement of consolidated derivative action resulting in sweeping corporate governance reform estimated at \$159 million) *Bangari v. Lesnik, et al.*, No. 11 CH 41973 (Illinois Circuit Court, County of Cook) (settlement of claim resulting in payment of \$20 million to Career Education Corporation and implementation of extensive corporate governance reform); *In re Diamond Foods, Inc. Shareholder Litigation*, No. CGC-11-515895 (California Superior Court, County of San Francisco) (\$10.4 million in monetary relief including a \$5.4 million clawback of executive compensation and significant corporate governance reform).

Mr. Houston graduated from Boston University School of Law in 1988 and has been selected as a New York Metro Super Lawyer often. Mr. Houston is a member of the Bar of the State of New York and is admitted to the United States District Courts for the Southern and Eastern Districts of New York and the District of Massachusetts, and the Second, Seventh, Ninth, and Eleventh Circuit Court of Appeals of the United States.

JASON L. KRAJCER is a partner in the Firm's Los Angeles office. He specializes in complex securities cases and has extensive experience in all phases of litigation (fact investigation, pre-trial motion practice, discovery, trial, appeal).

Prior to joining the Firm, Mr. Krajcer was an associate at Goodwin Procter LLP where he represented issuers, officers and directors in multi-hundred million and billion dollar securities cases. He began his legal career at Orrick, Herrington & Sutcliffe LLP, where he represented issuers, officers and directors in securities class actions, shareholder derivative actions, and matters before the U.S. Securities & Exchange Commission.

Mr. Krajcer is admitted to the State Bar of California, the Bar of the District of Columbia, the United States Supreme Court, the Ninth Circuit Court of Appeals, and the United States District Courts for the Central and Southern Districts of California.

CHARLES H. LINEHAN is a partner in the Firm's Los Angeles office. He graduated summa cum laude from the University of California, Los Angeles with a Bachelor of Arts degree in Philosophy and a minor in Mathematics. Mr. Linehan received his Juris Doctor degree from the UCLA School of Law, where he was a member of the UCLA Moot Court Honors Board. While attending law school, Mr. Linehan participated in the school's First Amendment Amicus Brief Clinic (now the Scott & Cyan Banister First Amendment Clinic) where he worked with nationally recognized scholars and civil rights organizations to draft amicus briefs on various Free Speech issues.

GREGORY B. LINKH litigates antitrust, securities, shareholder derivative, and consumer cases. Mr. Linkh graduated from the State University of New York at Binghamton in 1996 and from the University of Michigan Law School in 1999. While in law school, Greg externed with United States District Judge Gerald E. Rosen of the Eastern District of Michigan. Greg was previously associated with the law firms Dewey Ballantine LLP, Pomerantz Haudek Block Grossman & Gross LLP, and Murray Frank LLP.

Mr. Linkh played significant roles in *In re Merrill Lynch & Co., Inc. Research Reports Securities Litigation* (\$125 million settlement); *In re Crompton Corp. Securities Litigation* (\$11 million settlement); *Lowry v. Andrx Corp.* (\$8 million settlement); *In re Xybernaut Corp. Securities MDL Litigation* (\$6.3 million settlement). Mr. Linkh also represented the West Virginia Investment Management Board in *WVIMB v. Residential Accredited Loans, Inc., et al.*, relating to the its investment in residential mortgage-backed securities.

Greg is the co-author of *Inherent Risk In Securities Cases In The Second Circuit*, NEW YORK LAW JOURNAL (Aug. 26, 2004); and *Staying Derivative Action Pursuant to PSLRA and SLUSA*, NEW YORK LAW JOURNAL, P. 4, COL. 4 (Oct. 21, 2005).

ROBERT V. PRONGAY is the Firm's Managing Partner. Mr. Prongay is recognized nationally as a leading securities litigator and as one of the top plaintiffs' lawyers in California. His practice primarily focuses on actions to recover investment losses resulting from violations of the federal securities laws and actions to vindicate shareholder rights in response to corporate misconduct. Mr. Prongay plays a key role in the investigation and initiation of new matters on behalf of the Firm's institutional and individual investor clients.

Mr. Prongay has extensive experience litigating complex cases in state and federal courts nationwide. As lead counsel in dozens of securities class actions, he has successfully recovered more than a billion dollars for investors victimized by securities fraud. For example, as Lead Counsel, Mr. Prongay and the Firm secured a recovery of \$433.5 million for the class of investors in *In Re: Alibaba Group Holding Ltd. Securities Litigation*, Case No. 1:20-cv-09568-GBD-JW (S.D.N.Y.). Mr. Prongay also served as Co-Lead Counsel in *Camelot Event Driven Fund, a Series of Frank Funds Trust v. Morgan Stanley & Co. LLC, et al.*, Index No. 654959/2021 (Supreme Court, New York County) where the Firm obtained a \$120 million settlement paid by Morgan Stanley and Goldman Sachs. Mr. Prongay was also Co-Lead Counsel in *In Re Yahoo! Inc. Securities Litigation*, Case No. 5:17-cv-00373-LHK (N.D. Cal.), that resulted in an \$80 million settlement and Lead Counsel in *Shah, et al. v. Zimmer Biomet Holdings, Inc. et al.*, Case No. 3:16-cv-00815-PPS-MGG (N.D. Ind.) that resulted in a \$50 million settlement.

Many of Mr. Prongay's cases have received national and regional press coverage. Mr. Prongay has been interviewed by journalists and writers for national and industry publications, ranging from *The Wall Street Journal* to the *Los Angeles Daily Journal*, and has appeared as a guest on Bloomberg Television.

Mr. Prongay received his Bachelor of Arts degree in Economics from the University of Southern California and his Juris Doctor degree from Seton Hall University School of Law. Mr. Prongay is also an alumnus of the Lawrenceville School.

DANIELLA QUITT has focused her practice on shareholder rights, securities class actions, and ERISA class actions but also handles general commercial and consumer litigation. Ms. Quitt serves as a member of the S.D.N.Y. ADR Panel, has been consistently selected as a New York Metro Super Lawyer, and *Super Lawyers Magazine* selected Ms. Quitt as a Super Lawyer beginning in 2014.

Ms. Quitt has extensive experience in successfully litigating complex class actions from inception to trial and has played a significant role in numerous actions wherein substantial benefits were conferred upon plaintiff shareholders, such as *In re Safety-Kleen Corp. Stockholders Litigation*, (D.S.C.) (settlement fund of \$44.5 million); *In re Laidlaw Stockholders Litigation*, (D.S.C.) (settlement fund of \$24 million); *In re UNUMProvident Corp. Securities Litigation*, (D. Me.) (settlement fund of \$45 million); *In re Harnischfeger Industries* (E.D. Wisc.) (settlement fund of \$10.1 million); *In re Oxford Health Plans, Inc. Derivative Litigation*, (S.D.N.Y.) (settlement benefit of \$13.7 million and corporate therapeutics); *In re JWP Inc. Securities Litigation*, (S.D.N.Y.) (settlement fund of \$37 million); *In re Home Shopping Network, Inc., Derivative Litigation*, (S.D. Fla.) (settlement benefit in excess of \$20 million); *In re Graham-Field Health Products, Inc. Securities Litigation*, (S.D.N.Y.) (settlement fund of \$5.65 million); *Benjamin v. Carusona*, (E.D.N.Y.) (prosecuted action on behalf of minority shareholders which resulted in a change of control from majority-controlled management at Gurney's Inn Resort & Spa Ltd.); *In re Rexel Shareholder Litigation*, (Sup. Ct. N.Y. County) (settlement benefit in excess of \$38 million);

Jacobs v. Verizon Communications (S.D.N.Y.) (ERISA settlement of \$30 million); and *Croyden Assoc. v. Tesoro Petroleum Corp., et al.*, (Del. Ch.) (settlement benefit of \$19.2 million).

Ms. Quitt graduated from Fordham University School of Law in 1988, is a member of the Bar of the State of New York, and is also admitted to the United States District Courts for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Second, Fifth, and Ninth Circuits, and the United States Supreme Court.

PAVITHRA RAJESH is a partner in the firm's Los Angeles office who litigates securities class actions. She specializes in pre-litigation investigation to develop legal theories in securities and derivative matters. Her notable work includes a \$120 million settlement (for claims that certain underwriters of a public offering failed to disclose that they held substantial holdings as collateral for a highly leveraged, highly concentrated portfolio), a \$10 million settlement (for claims that a medical device company misled investors about product effectiveness and off-label marketing) and an \$11 million settlement (for claims that investors in a business combination were misled about a financing commitment and an executive's embezzlement; pending final approval).

Ms. Rajesh has unique writing experience from her judicial externship for the Patent Pilot Program in the United States District Court for the Central District of California, where she worked closely with the Clerk and judges in the program on patent cases. Ms. Rajesh graduated from University of California, Santa Barbara with a Bachelor of Science degree in Mathematics and a Bachelor of Arts degree in Psychology. She received her Juris Doctor degree from UCLA School of Law. While in law school, Ms. Rajesh was an Associate Editor for the UCLA Law Review.

JONATHAN M. ROTTER leads the Firm's intellectual property litigation practice and the antitrust litigation practice. Mr. Rotter has extensive experience in class action litigation, including in the fields of data privacy, digital content, securities, consumer protection, and antitrust. His cases often involve technical and scientific issues, and he excels at the critical skill of understanding and organizing complex subject matter in a way helpful to judges, juries, and ultimately, the firm's clients. Since joining the Firm, he has played a key role in cases recovering over \$100 million. He handles cases on contingency, partial contingency, and hourly bases, and works collaboratively with other lawyers and law firms across the country.

Before joining the firm, Mr. Rotter served for three years as the first Patent Pilot Program Law Clerk at the United States District Court for the Central District of California, both in Los Angeles and Orange County. There, he assisted the Honorable S. James Otero, Andrew J. Guilford, George H. Wu, John A. Kronstadt, and Beverly Reid O'Connell with hundreds of patent cases in every major field of technology, from complaint to post-trial motions, advised on case management strategy, and organized and provided judicial education. Mr. Rotter also served as a law clerk for the Honorable Milan D. Smith, Jr. on the United States Court of Appeals for the Ninth Circuit, working on the full range of matters handled by the Circuit.

Before his service to the courts, Mr. Rotter practiced at an international law firm, where he argued appeals at the Federal Circuit, Ninth Circuit, and California Court of Appeal, tried cases, argued motions, and managed all aspects of complex litigation. He also served as a volunteer criminal prosecutor for the Los Angeles City Attorney's Office.

Mr. Rotter graduated with honors from Harvard Law School in 2004. He served as an editor of the Harvard Journal of Law & Technology, was a Fellow in Law and Economics at the John M.

Olin Center for Law, Economics, and Business at Harvard Law School, and a Fellow in Justice, Welfare, and Economics at the Harvard University Weatherhead Center For International Affairs. He graduated with honors from the University of California, San Diego in 2000 with a B.S. in molecular biology and a B.A. in music.

Mr. Rotter served on the Merit Selection Panel for Magistrate Judges in the Central District of California, and served on the Model Patent Jury Instructions and Model Patent Local Rules subcommittees of the American Intellectual Property Law Association. He has written extensively on intellectual property issues, and has been honored for his work with legal service organizations. He is admitted to practice in California and before the United States Courts of Appeals for the First, Second, Ninth and Federal Circuits, the United States District Courts for the Northern, Central, and Southern Districts of California, and the United States Patent & Trademark Office.

KEVIN F. RUF graduated from the University of California at Berkeley with a Bachelor of Arts in Economics and earned his Juris Doctor degree from the University of Michigan. He was an associate at the Los Angeles firm Manatt Phelps and Phillips from 1988 until 1992, where he specialized in commercial litigation. In 1993, he joined the firm Corbin & Fitzgerald (with future federal district court Judge Michael Fitzgerald) specializing in white collar criminal defense work.

Mr. Ruf joined the Firm in 2001 and works on a diverse range of trial and appellate cases; he is also head of the Firm's Labor practice. Mr. Ruf has successfully argued a number of important appeals, including in the 9th Circuit Court of Appeals. He has twice argued cases before the California Supreme Court – winning both.

In *Smith v. L'Oreal* (2006), after Mr. Ruf's winning arguments, the California Supreme Court established a fundamental right of all California workers to immediate payment of all earnings at the conclusion of their employment.

Mr. Ruf gave the winning oral argument in one of the most talked about and wide-reaching California Supreme Court cases of recent memory: *Lee v. Dynamex* (2018). The Dynamex decision altered 30 years of California law and established a new definition of employment that brings more workers within the protections of California's Labor Code. The California legislature was so impressed with the Dynamex result that promulgated AB5, a statute to formalize this new definition of employment and expand its reach.

Mr. Ruf has been named three times as one of the Daily Journal's "Top 75 Employment Lawyers." He won the prestigious California Lawyer of the Year (CLAY) award in 2019 for his work on the *Dynamex* case. In 2021, Mr. Ruf was named by California's legal paper of record, the Daily Journal, as one of 18 California "Lawyers of the Decade."

From 2014 to 2022, Mr. Ruf served as an elected member of the Ojai Unified School District Board of Trustees. Mr. Ruf was also a Main Company Member of the world-famous Groundlings improv and sketch comedy troupe – where "everyone else got famous."

BENJAMIN I. SACHS-MICHAELS, is the head of the Firm's shareholder derivative group. With over 12 years in experience, Mr. Sachs-Michaels prosecutes mismanagement and breach of fiduciary duty claims in state and federal courts nationwide. He specializes in helping shareholders strengthen their investments by holding managers accountable when they permit corporate misconduct. Mr. Sachs-Michaels has achieved shareholder derivative settlements totaling

hundreds of millions of dollars and the adoption of significant corporate governance reforms at dozens of public companies.

Mr. Sachs-Michaels played an integral part in achieving recoveries in the following derivative class actions on behalf of investors: *Witchko v. Schorsch, et al.* (\$286.5 million settlement); *Verma v. Costolo (Twitter)* (\$46.75 million settlement); and *In re Stamps.com, Inc. Stockholder Derivative Litigation* (\$30 million settlement).

Mr. Sachs-Michaels graduated from Benjamin N. Cardozo School of Law in 2011. While in law school, he served as a judicial intern to Senior United States District Judge Thomas J. McAvoy in the United States District Court for the Northern District of New York and was a member of the Cardozo Journal of Conflict Resolution.

Mr. Sachs-Michaels is a member of the Bar of the State of New York. He is also admitted to the United States District Courts for the Southern and Eastern Districts of New York and the United States Court of Appeals for the Second Circuit.

CASEY E. SADLER has worked with the Firm's clients to secure lead plaintiff appointment in hundreds of securities class actions. With over 14 years of experience litigating securities class actions, Casey is highly skilled in all aspects of securities cases, including legal briefing and oral advocacy. He has overseen numerous cases from start to finish that resulted in tremendous outcomes for shareholders. Notable successes include: *The City of Farmington Hills Employees Retirement System v. Wells Fargo Bank, N.A.* (\$62.5 million settlement on eve of trial); *In re Sesen Bio, Inc. Securities Litigation*, (\$21 million settlement).

Mr. Sadler graduated from Emory University and the University of Southern California, Gould School of Law. He is admitted to the State Bar of California, the United States Court of Appeals for Ninth Circuit, and the United States District Courts for the Northern, Southern, and Central Districts of California.

EX KANO S. SAMS II has extensive experience litigating complex securities and consumer cases and has served as lead counsel in dozens of securities class actions and complex litigation cases on the state and federal levels throughout the United States. Mr. Sams was one of the counsel for respondents in *Cyan, Inc. v. Beaver Cnty. Emps. Ret. Fund*, 583 U.S. 416 (2018), in which the United States Supreme Court ruled unanimously in favor of respondents, holding that: (1) the Securities Litigation Uniform Standards Act of 1998 ("SLUSA") does not strip state courts of jurisdiction over class actions alleging violations of only the Securities Act of 1933; and (2) SLUSA does not empower defendants to remove such actions from state to federal court. Mr. Sams also participated in a successful appeal before a Fifth Circuit panel that included former United States Supreme Court Justice Sandra Day O'Connor sitting by designation, in which the court unanimously vacated the lower court's denial of class certification, reversed the lower court's grant of summary judgment, and issued an important decision on the issue of loss causation in securities litigation: *Alaska Electrical Pension Fund v. Flowserve Corp.*, 572 F.3d 221 (5th Cir. 2009). The case settled for \$55 million.

Mr. Sams has also obtained other significant results. Notable examples include: *Donley v. Live Nation Ent., Inc.*, 2024 WL 794641 (C.D. Cal. Feb. 23, 2024) (denying motion to dismiss; case settled for \$20 million); *Beezley v. Fenix Parts, Inc.*, 2018 WL 3454490 (N.D. Ill. July 13, 2018) (denying motion to dismiss); *In re Flowers Foods, Inc. Sec. Litig.*, 2018 WL 1558558 (M.D. Ga.

Mar. 23, 2018) (largely denying motion to dismiss; case settled for \$21 million); *In re King Digital Entm't plc S'holder Litig.*, No. CGC-15-544770 (San Francisco Superior Court) (case settled for \$18.5 million); *In re Castlight Health, Inc. S'holder Litig.*, Lead Case No. CIV533203 (California Superior Court, County of San Mateo) (case settled for \$9.5 million); *Wiley v. Envivio, Inc.*, Master File No. CIV517185 (California Superior Court, County of San Mateo) (case settled for \$8.5 million); *In re CafePress Inc. S'holder Litig.*, Master File No. CIV522744 (California Superior Court, County of San Mateo) (case settled for \$8 million).

Mr. Sams has been an author or co-author of several articles in major legal publications, including “9th Circuit Decision Clarifies Securities Fraud Loss Causation Rule” published in the February 8, 2018 issue of the *Daily Journal*, and “Market Efficiency in the World of High-Frequency Trading” published in the December 26, 2017 issue of the *Daily Journal*.

Mr. Sams earned his Bachelor of Arts degree in Political Science from the University of California Los Angeles and his Juris Doctor degree from the University of California Los Angeles School of Law, where he served as a member of the *UCLA Law Review*. After law school, Mr. Sams practiced class action civil rights litigation on behalf of plaintiffs.

LEANNE HEINE SOLISH has extensive experience litigating complex securities cases in federal courts nationwide. Since joining the Firm in 2012, Ms. Solish has helped secure several large class action settlements for injured investors: *The City of Farmington Hills Employees Retirement System v. Wells Fargo Bank*, Case No. 10-4372--DWF/JJG (D. Minn.) (\$62.5 million settlement on behalf of participants in Wells Fargo’s securities lending program. The settlement was reached on the eve of trial and ranked among the largest recoveries achieved in a securities lending class action stemming from the 2008 financial crisis.); *Mild v. PPG Industries, Inc. et al.*, Case No. 2:18-cv-04231 (C.D. Cal.) (\$25 million settlement); *In re Penn West Petroleum Ltd. Securities Litigation*, Case No. 1:14-cv-06046-JGK (S.D.N.Y.) (\$19 million settlement for the U.S. shareholder class as part of a \$39 million global settlement); *In re ITT Educational Services, Inc. Securities Litigation (Indiana)*, Case No. 1:14-cv-01599-TWP-DML (\$12.5375 million settlement); *In re Doral Financial Corporation Securities Litigation*, Case No. 3:14-cv-01393-GAG (D.P.R.) (\$7 million settlement); *Larson v. Insys Therapeutics Incorporated, et al.*, Lead Case No. 14-cv-01043-PHX-GMS (D. Ariz.) (\$6.125 million settlement); *In re Unilife Corporation Securities Litigation*, Case No. 1:16-cv-03976-RA (\$4.4 million settlement).

Super Lawyers Magazine selected Ms. Solish as a “Rising Star” in the area of Securities Litigation from 2016 through 2019.

Ms. Solish graduated *summa cum laude* with a B.S.M. in Accounting and Finance from Tulane University, where she was a member of the Beta Alpha Psi honors accounting organization and was inducted into the Beta Gamma Sigma Business Honors Society. Ms. Solish subsequently earned her J.D. from the University of Texas School of Law.

Ms. Solish is admitted to the State Bar of California, the Ninth Circuit Court of Appeals, and the United States District Courts for the Central, Northern, and Southern Districts of California. Ms. Solish is also a Registered Certified Public Accountant in Illinois.

GARTH A. SPENCER helps defrauded investors recover funds through securities litigation, and also represents whistleblowers and harmed consumers. Since joining the Firm in 2016, he has successfully prosecuted complex class action claims to obtain recoveries for the Firm’s clients, taking leading roles in matters including: *Li v. Spirit AeroSystems Holdings, Inc.* (S.D.N.Y. Case

No. 1:23-cv-3722) (\$29.2 million settlement); *In re Mullen Automotive, Inc. Securities Litigation*, Case No. 2:22-cv-03026 (C.D. Cal.) (\$7.25 million settlement); *In re Reconnaissance Energy Africa Ltd. Securities Litigation*, Case No. 1:21-cv-6176 (E.D.N.Y.) (CAD \$9.4 million settlement); and *In re XL Fleet Corp. Securities Litigation*, Case No. 1:21-cv-2002 (S.D.N.Y.) (\$19.5 million settlement).

Mr. Spencer received his J.D. from Duke University School of Law, an L.L.M. from New York University School of Law, and a B.A. from Grinnell College. Prior to joining the Firm, Mr. Spencer pursued IRS whistleblower matters as a sole practitioner and previously worked in the tax group of a large law firm.

Mr. Spencer is a member of the bar in New York, California, and North Carolina, and is admitted to practice before the United States District Courts for the Southern, Eastern, and Western Districts of New York, the Northern, Southern, and Central Districts of California, the Eastern, Middle, and Western Districts of North Carolina, the Southern District of Texas, the U.S. Tax Court, the U.S. Court of Federal Claims, and the Courts of Appeals for the First, Second and Ninth Circuits.

DAVID J. STONE has a broad background in complex commercial litigation, with particular focus on litigating corporate fiduciary claims, securities, and contract matters. Mr. Stone maintains a versatile practice in state and federal courts, representing clients in a wide-range of matters, including corporate derivative actions, securities class actions, litigating claims arising from master limited partnership “drop down” transactions, litigating consumer class actions (including data breach claims) litigating complex debt instruments, fraudulent conveyance actions, and appeals. Mr. Stone also has developed a specialized practice in litigation on behalf of post-bankruptcy confirmation trusts, including investigating and prosecuting D&O claims and general commercial litigation. In addition, Mr. Stone counsels clients on general business matters, including contract negotiation and corporate organization.

Mr. Stone graduated from Boston University School of Law in 1994 and was the Law Review Editor. He earned his B.A. at Tufts University in 1988, graduating *cum laude*. Following law school, Mr. Stone served as a clerk to the Honorable Joseph Tauro, then Chief Judge of the U.S. District Court for the District of Massachusetts. Prior to joining the Firm, Mr. Stone practiced at international law firms Cravath, Swaine & Moore LLP, Morrison & Foerster LLP, and Greenberg Traurig LLP.

Mr. Stone is a member of the bar in New York and California, and is admitted to practice before the United States District Courts for the Southern and Eastern Districts of New York, the Northern, Southern, and Central Districts of California, and the Court of Appeals for the Second and Third Circuits.

KARA M. WOLKE is Co-Chair of the Firm’s securities litigation practice group and serves as the Firm’s General Counsel. With over two decades of experience in financial class action litigation, Ms. Wolke has helped to recover hundreds of millions of dollars for injured investors and consumers.

Ms. Wolke served as lead counsel in *In re: Alibaba Group Ltd. Securities Litigation*, Case No. 20-cv-09568 (S.D.N.Y.), which alleged that Alibaba misled investors in its disclosures regarding the company’s anti-trust regulatory risks and compliance. After hard-fought litigation, Ms. Wolke

successfully negotiated a \$433.5 million settlement for the benefit of aggrieved investors. The settlement is one of the fifty largest securities class action settlements in the U.S. since the PSLRA was enacted nearly thirty years ago.

Other notable cases include: *Christine Asia Co. Ltd., et al. v. Jack Yun Ma, et al.*, Case No. 15-md-02631 (S.D.N.Y.) (\$250 million securities class action settlement); *Farmington Hills Employees' Retirement System v. Wells Fargo Bank*, Case No. 10-4372 (D. Minn.) (\$62.5 million settlement on behalf of participants in Wells Fargo's securities lending program. The settlement was reached on the eve of trial and ranked among the largest recoveries achieved in a securities lending class action stemming from the 2008 financial crisis.); *Shah v. Zimmer Biomet Holdings, Inc.*, Case No. 16-cv-00815 (N.D. Ind.) (\$50 million securities class action settlement); *Schleicher, et al. v. Wendt, et al.* (Conseco), Case No. 02-cv-1332 (S.D. Ind.) (\$41.5 million securities class action settlement); *Lapin v. Goldman Sachs*, Case No. 03-850 (S.D.N.Y.) (\$29 million securities class action settlement); *Davis v. Yelp, Inc.*, Case No. 18-cv-0400 (N.D. Cal.) (\$22.5 million securities class action settlement).

Ms. Wolke has been named a Super Lawyers "Rising Star," and her work on behalf of investors has earned her recognition as a LawDragon Leading Plaintiff Financial Lawyer during each year from 2019 through 2025.

With a background in intellectual property, Ms. Wolke was a part of the team of lawyers who successfully challenged the claim of copyright ownership to the song "Happy Birthday to You" on behalf of artists and filmmakers who had been forced to pay hefty licensing fees to publicly sing the world's most famous song. In the resolution of that action, the defendant music publishing company funded a settlement of \$14 million and, significantly, agreed to relinquish the song to the public domain. Previously, Ms. Wolke penned an article regarding the failure of U.S. Copyright Law to provide an important public performance right in sound recordings, 7 Vand. J. Ent. L. & Prac. 411, which was nationally recognized and received an award by the American Bar Association and the Grammy® Foundation.

Committed to the provision of legal services to vulnerable or disenfranchised individuals and groups, Ms. Wolke also oversees the Firm's *pro bono practice*. She has served as a volunteer attorney for KIND (Kids In Need of Defense), representing unaccompanied immigrant and refugee children in custody and deportation proceedings, and helping them to secure legal permanent residency status in the U.S.

Ms. Wolke graduated *summa cum laude* with a Bachelor of Science in Economics from The Ohio State University in 2001. She subsequently earned her J.D. *with honors* from Ohio State, where she received the Dean's Award for Excellence during each of her three years.

MELISSA C. WRIGHT is a partner in the Firm's Los Angeles office. Ms. Wright specializes in complex litigation, particularly the prosecution of securities fraud and consumer class actions. Ms. Wright is experienced in all facets of litigation with particular expertise in the fact and expert discovery phases of litigation, including preservation through document production as well as negotiating protocols governing confidentiality and electronically stored information, identifying relevant electronically stored information, and overseeing and implementing e-discovery data culling and privilege and responsiveness reviews.

As sole lead counsel in *In re: Alibaba Group Holding Ltd. Securities Litigation*, Case No. 20-cv-09568 (S.D.N.Y.), Ms. Wright, along with partner Kara Wolke, secured an historic \$433.5

million settlement that resolved investors' claims that Alibaba (NYSE: BABA) violated the Securities Exchange Act of 1934 by allegedly misrepresenting its regulatory compliance and its use of monopolistic business practices during the period November 13, 2019 through December 23, 2020. The settlement is the largest securities class action settlement ever attained against a Chinese issuer and ranks among the fifty largest U.S. securities class action settlements of all time, as tracked by Institutional Shareholder Services (ISS).

Ms. Wright also played an integral role on the Firm's litigation team in *Christine Asia Ltd. v. Jack Yun Ma, et al.* (Alibaba Group Holding Ltd.) (\$250 million settlement), and in particular was responsible for all facets of discovery strategy and management for the Firm. Ms. Wright also played a significant role in other notable recoveries including: *In re Yahoo! Inc. Securities Litigation* (\$80 million settlement); *In re Sesen Bio, Inc. Securities Litigation* (\$21 million settlement); *In re Flowers Foods, Inc. Securities Litigation* (\$21 million settlement); *In re Romeo Power Inc. Securities Litigation* (\$14.9 million settlement); *In re Tenaris S.A. Securities Litigation* (\$9.5 million settlement).

In addition to her advocacy on behalf of aggrieved investors and consumers, Ms. Wright maintains an active pro bono practice as a volunteer attorney with Kids In Need of Defense, where she works diligently to help safeguard the rights and well-being of immigrant and refugee children.

Ms. Wright graduated with a B.A. from Boston University and received her J.D. from U.C. Davis School of Law, where she was a board member of the Tax Law Society and externed for the California Board of Equalization's Tax Appeals Assistance Program. Ms. Wright also received her LL.M. in Taxation from NYU School of Law.

OF COUNSEL

PHILIP BABLER represents shareholders and whistleblowers in matters involving breach of fiduciary duty, fraud, and public company shareholder derivative litigation.

Before joining the Firm, Mr. Babler practiced at an AmLaw 50 firm where he represented directors and officers in cases involving, among other things, breach of fiduciary duty claims, governance issues, M&A litigation, federal securities claims, and insider trading investigations. Mr. Babler brings insights from this experience representing directors and officers to his shareholder practice. Mr. Babler has been repeatedly recognized by *The Best Lawyers in America: Ones to Watch*®.

In addition to his public company work, Mr. Babler has significant experience representing shareholders in privately held companies who are being squeezed out of family businesses. Mr. Babler also has substantial appellate experience, having briefed and argued appeals in state and federal appellate courts around the country.

After law school, Mr. Babler clerked for Justice David T. Prosser, Jr. on the Wisconsin Supreme Court. Mr. Babler graduated from Marquette University Law School and is admitted to practice in Wisconsin, the United States Court of Appeals for the Federal Circuit, the Seventh Circuit, and the Eighth Circuit, and the United States District Court for the Eastern District of Wisconsin.

PETER A. BINKOW has prosecuted lawsuits on behalf of consumers and investors in state and federal courts throughout the United States. He served as Lead or Co-Lead Counsel in many class action cases, including: *In re Mercury Interactive Securities Litigation* (\$117.5 million recovery); *The City of Farmington Hills Retirement System v Wells Fargo* (\$62.5 million recovery);

Schleicher v Wendt (Conseco Securities litigation - \$41.5 million recovery); *Lapin v Goldman Sachs* (\$29 million recovery); *In re Heritage Bond Litigation* (\$28 million recovery); *In re National Techteam Securities Litigation* (\$11 million recovery for investors); *In re Lason Inc. Securities Litigation* (\$12.68 million recovery), *In re ESC Medical Systems, Ltd. Securities Litigation* (\$17 million recovery); and many others. In *Schleicher v Wendt*, Mr. Binkow successfully argued the seminal Seventh Circuit case on class certification, in an opinion authored by Chief Judge Frank Easterbrook. He has argued and/or prepared appeals before the Ninth Circuit, Seventh Circuit, Sixth Circuit and Second Circuit Courts of Appeals.

Mr. Binkow joined the Firm in 1994. Mr. Binkow obtained a Bachelor of Arts degree from the University of Michigan in 1988 and a Juris Doctor degree from the University of Southern California in 1994.

MARK S. GREENSTONE specializes in consumer, financial fraud and employment-related class actions. Possessing significant law and motion and trial experience, Mr. Greenstone has represented clients in multi-million dollar disputes in California state and federal courts, as well as the Court of Federal Claims in Washington, D.C.

Mr. Greenstone received his training as an associate at Sheppard, Mullin, Richter & Hampton LLP where he specialized in complex business litigation relating to investment management, government contracts and real estate. Upon leaving Sheppard Mullin, Mr. Greenstone founded an internet-based company offering retail items on multiple platforms nationwide. He thereafter returned to law bringing a combination of business and legal skills to his practice.

Mr. Greenstone graduated Order of the Coif from the UCLA School of Law. He also received his undergraduate degree in Political Science from UCLA, where he graduated Magna Cum Laude and was inducted into the Phi Beta Kappa honor society.

Mr. Greenstone is a member of the Consumer Attorneys Association of Los Angeles, the Santa Monica Bar Association and the Beverly Hills Bar Association. He is admitted to practice in state and federal courts throughout California.

ROBERT I. HARWOOD, as Of Counsel, has prosecuted numerous securities, class, derivative, and ERISA actions. He is a member of the Trial Lawyers' Section of the New York State Bar Association and has served as a guest lecturer at trial advocacy programs sponsored by the Practising Law Institute. He is also a Member of the Board of Directors of the MFY Legal Services Inc., which provides free legal representation in civil matters to the poor and the mentally ill in New York City. Since 1999, Mr. Harwood has also served as an Associate Justice for the Village of Dobbs Ferry, New York.

Mr. Harwood served as lead counsel in *Morse v. McWhorter* (Columbia/HCA Healthcare Securities Litigation), (M.D. Tenn.), in which a settlement fund of \$49.5 million was created for the benefit of the Class, as well as *In re Bank One Securities Litigation*, (N.D. Ill.), which resulted in the creation of a \$45 million settlement fund. Mr. Harwood also served as co-lead counsel in *In re Safety-Kleen Corp. Stockholders Litigation*, (D.S.C.), which resulted in a settlement fund of \$44.5 million; *In re JWP Inc. Securities Litigation*, (S.D.N.Y.), which resulted in a \$37 million settlement fund; and *In re UNUMProvident Corp. Securities Litigation*, (D. Me.), which resulted in the creation of settlement fund of \$45 million. Mr. Harwood was also one of the lead attorneys in litigating claims in *In re FedEx Ground Package Inc. Employment Practices Litigation*, No. 3:05-

MD-527 (MDL 1700), a multi-district litigation concerning employment classification of pickup and delivery drivers resulting in a \$242,000,000 settlement.

Mr. Harwood graduated from William and Mary Law School in 1971, and has specialized in securities law and securities litigation since beginning his career in 1972 at the Enforcement Division of the New York Stock Exchange.

TAKEO A. KELLAR is Of Counsel in the Firm's San Diego office. Mr. Kellar has significant experience in securities fraud class actions, opt-out direct actions and shareholder derivative actions on behalf of institutional and individual investors, as well as consumer class actions and other complex litigation. Mr. Kellar has been an integral member of litigation teams who successfully prosecuted numerous securities actions that have recovered hundreds of millions of dollars for investors. His experience and strong skills in all aspects of complex and class action litigation in state, federal and appellate courts provide a valuable resource in developing and implementing redress strategies and litigating favorable resolutions for the firm's clients and class members.

Mr. Kellar is a graduate of the University of San Diego School of Law (J.D.) and the University of California, Riverside (B.A.). Mr. Kellar is admitted to practice in the State of California and before the United States District Courts for the Central, Northern and Southern Districts of California, and the Courts of Appeal for the Third and Ninth Circuits.

JOHN C. ROBERTS is Of Counsel at the Firm, where his practice focuses on representing plaintiffs in federal securities class actions, shareholder derivative litigation, and consumer class actions.

Mr. Roberts has extensive experience representing plaintiffs and defendants in all aspects of class action litigation, and he has done so in state and federal courts across the country. Mr. Roberts has an established track record of success in federal securities class actions and shareholder derivative actions. He has an extensive experience managing class action litigation, a long history of dispositive briefing in high-stakes matters, and a deep knowledge of state and federal appellate litigation.

Prior to joining the Firm, Mr. Roberts spent more than a decade at the Seattle office of a Silicon Valley-based defense firm, where he litigated dozens of federal securities class actions and shareholder derivative suits on behalf of large publicly-traded companies, including Costco and Starbucks. John also maintained a robust pro bono practice at the firm and has extensive experience with state and federal civil rights litigation.

Mr. Roberts graduated from DePaul University College of Law in Chicago, Illinois. After law school, he clerked for the Honorable Judge Richard D. Cudahy of the U.S. Court of Appeals for the Seventh Circuit. He began his legal career at a Chicago-based litigation firm doing complex commercial and appellate litigation.

SENIOR COUNSEL

CHRISTOPHER M. THOMS is Senior Discovery Counsel and his practice includes large-scale electronic discovery encompassing all stages of litigation, securities and antitrust litigation. Mr. Thoms manages attorneys in fact-finding for depositions, expert discovery, and trial preparation.

Prior to joining the Firm, Mr. Thoms worked as a staff attorney at O'Melveny & Meyers LLP where he managed eDiscovery issues in complex class actions and multi-district litigations. Mr. Thoms also worked as a contract attorney for various law firms in Los Angeles.

Mr. Thoms graduated with a Bachelor of Arts and a Masters of Arts from University of Miami and received his J.D. from Southwestern University School of Law. Mr. Thoms is a member of the state bar of California and admitted to practice before the United States District Courts for the Central District of California.

ASSOCIATES

KENNETH CHANG is an Associate in the Firm's Los Angeles office. His practice includes antitrust, consumer, and securities litigation.

Prior to law school, Mr. Chang worked as a software engineer at a major technology company. He is a native speaker of English and Spanish and speaks conversational Cantonese.

Mr. Chang received his Bachelor of Science in Mathematics and Master of Science in Electrical Engineering from Stanford University. He earned his Juris Doctor from Stanford Law School, where he served as an Executive Editor of the *Stanford Law Review* and received the John Hart Ely Prize for his research paper in law and economics.

REBECCA DAWSON specializes in complex civil litigation, class action securities litigation, and antitrust litigation.

Ms. Dawson previously worked at a highly respected plaintiff-side class action firm specializing in mass torts and antitrust litigation where she managed a wide variety of complex state and federal matters including false advertising, environmental torts and product liability claims.

During law school, Ms. Dawson was a clerking intern for the Chief Justice of the Court of International Trade. After law school, she clerked at the New York Supreme Court where she handled hundreds of complex commercial and civil litigation decisions. Ms. Dawson also participated in the Securities and Exchange Commission Honors program in the Office of the Investors Advocate. Prior to law school, she worked for the Brooklyn Bar Association. Ms. Dawson also has a background in financial data analysis.

Ms. Dawson earned her J.D. from City University of New York School of Law, where she was a Moot Court Competition Problem Author. She earned her B.A. from Bard College at Simon's Rock, where she majored in Political Science with a minor in Economics.

CHRIS DEL VALLE is an experienced attorney who has been a valuable member of the Firm since 2017. Mr. Del Valle has worked on a range of complex securities fraud cases, including *In re Akorn, Inc. Securities Litigation*, Case No. 15-CV-01944, (N.D. Ill.); *In re Yahoo! Inc. Securities Litigation*, Case No. 17-CV-00373-LHK (N.D. Cal.); *In re Endurance International Group Holdings*, Case No. 1:15-cv-11775-GAO; *In re LSB Industries, Inc. Securities Litigation*, Case No. 1:15-cv-07614-RA-GWG (S.D.N.Y.); *Christine Asia Ltd. v. Jack Yun Ma, et al.* (Alibaba Group Holding Ltd.), Case No. 1:15-md-02631 (S.D.N.Y.); *In re Community Health Systems Inc*, Case No. 3:19-cv-00461 (M.D. Tenn).

One of Mr. Del Valle's notable appellate successes was *Hartpence v. Kinetic Concepts, Inc.*, No. 19-55823 (9th Cir. 2022), alleging violations of the False Claims Act (FCA). Mr. Del Valle was

part of the legal team that successfully represented a whistleblower in obtaining 9th Circuit reversal of the lower court's order granting summary judgment.

With highly technical expertise in e-discovery, Mr. Del Valle specializes in all facets of the Firm's e-discovery needs, including crafting advanced search algorithms, predictive coding, and technology-assisted review. Mr. Del Valle also has a wealth of experience in deposition preparation, expert discovery, and preparing for summary judgment and trial.

Mr. Del Valle received a Bachelor of Arts degree from S.U.N.Y. Buffalo, majoring in English Literature/Journalism, and a Juris Doctor from California Western School of Law in San Diego.

FERNANDA GALBES has extensive experience in the discovery process of complex securities and antitrust class-action litigations including from pre-litigation investigations through depositions and expert discovery phases involving antitrust violations, securities fraud, and intellectual property disputes.

Ms. Galbes earned her Master of Laws (LL.M.) from Arizona State University in 2014 and a Bachelor of Laws (LL.B.) from Universidade Paulista. Fluent in Portuguese and proficient in Spanish, she brings valuable insight to cases requiring precise analysis of foreign legal documents and a nuanced understanding of cultural and linguistic complexities.

LISA HOLMAN is an experienced attorney specializing in complex securities, commercial and antitrust class action litigation, with particular expertise in the discovery phase of litigation. She played an integral role on the firm's discovery teams in several notable matters including *In re Alibaba Group Holding Limited Securities Litigation*, and *Camelot Event Driven Fund v. Morgan Stanley & Co. LLC, et al.*

Ms. Holman is a member of the Firm's E-Discovery Group, advancing the Firm's goal to guide and shape technological & digital advancements, best practices, and strategy in e-discovery.

Ms. Holman graduated from Cornell University with a Bachelor of Arts degree and received her Juris Doctor degree from The University of Michigan Law School. She is admitted to the State Bar of New York.

THOMAS J. KENNEDY works out of the New York office, where he focuses on securities, antitrust, mass torts, and consumer litigation. He received a Juris Doctor degree from St. John's University School of Law in 1995. At St. John's, he was a member of the ST. JOHN'S JOURNAL OF LEGAL COMMENTARY. Mr. Kennedy graduated from Miami University in 1992 with a Bachelor of Science degree in Accounting and has passed the CPA exam. Mr. Kennedy was previously associated with the law firm Murray Frank LLP.

HOLLY K. NYE is an associate in the Firm's Los Angeles office. Her practice concentrates on data privacy and consumer fraud class action litigation.

Ms. Nye also has a background in transactional legal work, having previously worked extensively with both financial institutions and borrowers, and real estate investors and developers in connection with commercial financing and complex real estate transactions. Her experience expands to a variety of business transactions including the initial formation and development of businesses, mergers and acquisitions, and succession planning.

While in law school, Ms. Nye practiced under West Virginia Rule 10 Certification through the university's Entrepreneurship and Innovation Law Clinic where she represented clients on a variety of intellectual property matters as well as start-up clients with business formation, funding, and growth and development.

Ms. Nye earned her B.S.B.A. from West Virginia University in 2018 where she majored in Marketing. She earned both her M.B.A. from West Virginia University John Chambers College of Business and Economics and her J.D. from West Virginia University College of Law in 2022, where she was selected for the Order of Barristers for having demonstrated exceptional skill in trial advocacy, oral advocacy, and brief writing throughout her law school career. Ms. Nye is admitted to practice in California and Ohio.

AMIR A. SOLEIMANPOUR is an Associate in the Firm's Los Angeles office. He received his Juris Doctor from the Washington & Lee School of Law in 2024. Mr. Soleimanpour's practice includes data privacy, securities fraud, and consumer protection litigation.

Mr. Soleimanpour graduated from Tufts University in 2019 with a Bachelor of Arts in International Relations. At the Washington & Lee School of Law, Mr. Soleimanpour was President of the Lewis F. Powell, Jr. Distinguished Lecture Series, where he hosted Judge J. Michael Luttig for the Series' 2024 Lecture. Mr. Soleimanpour was also a finalist in the 2022 Robert J. Grey, Jr. Negotiations Competition and was awarded the law faculty's 2024 Frederic L. Kirgis, Jr. International Law Award, for excellence in international law.