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

GLAZING EMPLOYERS AND GLAZIERS'
UNION LOCAL #27 PENSION AND
RETIREMENT FUND, on behalf of itself and
all others similarly situated,

Plaintiff,

v.

IRHYTHM TECHNOLOGIES, INC., et al.,

Defendants.

Case No. 3:24-cv-706-JSC

**DECLARATION OF KATHERINE M.
SINDERSON IN SUPPORT OF LEAD
COUNSEL'S MOTION FOR
ATTORNEYS' FEES AND
LITIGATION EXPENSES**

CLASS ACTION

Date: November 5, 2026

Time: 10:00 a.m.

Judge: Hon. Jacqueline Scott Corley

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TABLE OF EXHIBITS

Exhibit 1	Declaration of Chase Rankin, Executive Director of Oklahoma Firefighters Pension and Retirement System, in Support of (I) Lead Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses
Exhibit 2	CORNERSTONE RESEARCH, SECURITIES CLASS ACTION SETTLEMENTS: 2025 REVIEW AND ANALYSIS (2026)
Exhibit 3	Declaration of Sarah Evans Concerning: (A) Mailing / Emailing of Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received to Date
Exhibit 4	Summary of Lead Counsel's Hours and Lodestar
Exhibit 5	Breakdown of Lead Counsel's Hours by Major Litigation Tasks
Exhibit 6	Lead Counsel's Detailed Time Records
Exhibit 7	BLB&G Firm Resume
Exhibit 8	Lead Counsel's Expenses by Category
Exhibit 9	Lead Counsel's Detailed Expense Report
Exhibit 10	Compendium of Unpublished Opinions and Authority Cited in the Fee and Expense Motion

1 KATHERINE M. SINDERSON declares as follows:

2 1. I am a partner in the law firm of Bernstein Litowitz Berger & Grossmann LLP
3 (“BLB&G” or “Lead Counsel”), counsel for Lead Plaintiff Oklahoma Firefighters Pension and
4 Retirement System (“Oklahoma Firefighters” or “Lead Plaintiff”) and Lead Counsel for the
5 Settlement Class in the above-captioned action (the “Action”). I have personal knowledge of the
6 matters set forth herein based on my active participation in all aspects of the prosecution and
7 settlement of the Action.¹ I submit this Declaration in support of Lead Counsel’s motion for
8 attorneys’ fees and Litigation Expenses.

9 2. The proposed Settlement provides for the resolution of all claims in the Action in
10 exchange for a cash payment of \$45,000,000, plus interest, for the benefit of the Settlement Class.
11 The Settlement Amount has been paid into an escrow account and is earning interest. As detailed
12 herein, the Settlement is a highly favorable outcome for the Settlement Class because it confers a
13 substantial, certain, and near-term recovery for class members while avoiding the significant risks
14 of continued litigation, including the risk that the Settlement Class could recover nothing or less
15 than the Settlement Amount after years of additional litigation, appeals, and delay.

16 3. The proposed Settlement is the result of extensive efforts by Lead Counsel over
17 two and a half years of hard-fought litigation on a fully contingent basis. These efforts included,
18 among other things: (1) conducting a detailed investigation into the alleged fraud, including a
19 thorough review of public information such as filings with the U.S. Securities and Exchange
20 Commission (“SEC”), analyst reports, conference call transcripts, and news articles; consultation
21 with experts; and interviews with dozens of former iRhythm employees; (2) researching and
22 drafting a detailed Complaint based on Lead Counsel’s extensive investigation; (3) successfully
23 defeating in part Defendants’ motion to dismiss the Complaint through extensive briefing and oral
24

25 ¹ All capitalized terms that are not otherwise defined herein shall have the meanings provided in
26 the Stipulation and Agreement of Settlement dated June 3, 2026 (Dkt. No. 147-1) (the
27 “Stipulation”), which was entered into by and among (i) Lead Plaintiff, on behalf of itself and the
28 Settlement Class, and (ii) defendants iRhythm Technologies, Inc. (“iRhythm”) and its Chief
Executive Officer, Quentin Blackford (“Defendants”).

1 argument; (4) successfully defeating Defendants’ motion for judgment on the pleadings; (5) fully
2 briefing and arguing Lead Plaintiff’s motion for certification of the class; (6) conducting
3 substantial fact discovery which included exchanging initial disclosures, propounding thorough
4 document requests, issuing subpoenas to eight non-parties, reviewing over 400,000 pages
5 produced by Defendants and non-parties, and taking or defending seven depositions;
6 (7) consulting with experts, including financial experts on issues of damages, loss causation, and
7 market efficiency as well as experts on the regulation of medical devices by the Food and Drug
8 Administration (“FDA”); and (8) engaging in extended arm’s-length settlement negotiations
9 overseen by an independent mediator. Due to these extensive efforts, Lead Plaintiff and Lead
10 Counsel were well informed of the strengths and weaknesses of the claims and defenses in the
11 Action at the time they achieved the proposed Settlement.

12 4. For its efforts in achieving the Settlement, Lead Counsel requests an attorneys’ fee
13 award of 25% of the Settlement Fund. A 25% award is consistent with the benchmark for
14 percentage fee awards in the Ninth Circuit and is well within the range of percentage fees that
15 courts in this District and Circuit typically award in connection with comparable settlements.
16 Lead Counsel respectfully submits that the requested fee is fair and reasonable in light of the
17 result achieved in the Action, the efforts of Lead Counsel, and the risks and complexity of the
18 litigation.

19 5. Lead Plaintiff, which actively participated in the Action and closely supervised the
20 work of Lead Counsel, has approved the Settlement and endorsed Lead Counsel’s fee request. *See*
21 Declaration of Chase Rankin, Executive Director of Oklahoma Firefighters Pension and
22 Retirement System (“Rankin Decl.”), attached hereto as Exhibit 1, at ¶¶ 3-8.

23 6. Lead Counsel’s Fee and Expense Application also seeks payment of \$672,934.95
24 in Litigation Expenses incurred by Lead Counsel in connection with the prosecution and
25 settlement of the Action, and reimbursement of \$9,600.00 in costs incurred by Lead Plaintiff in
26 connection with its representation of the Settlement Class.

7. For all the reasons discussed in this Declaration and in the accompanying motions, including the quality of the result obtained and the meaningful litigation risks discussed below, Lead Counsel respectfully submits that the Fee and Expense Application is fair and reasonable and should be approved.

I. HISTORY OF THE ACTION

A. Background

8. Defendant iRhythm is a healthcare company headquartered in San Francisco, California that develops and manufactures cardiac monitoring devices designed to diagnose abnormalities in the timing or pattern of a patient's heartbeat, known as arrhythmias. At all relevant times, iRhythm common stock traded on the Nasdaq Stock Market under the ticker symbol "IRTC."

9. This Action arises from alleged materially false and misleading statements or omissions by Defendants concerning iRhythm's Zio AT heart monitoring device, including its purported near real-time data transmission capabilities, its appropriateness for high-risk patients, and the accuracy of the data reported by the device.

B. Filing of the Initial Complaint

10. On February 6, 2024, Glazing Employers and Glaziers' Union Local #27 Pension and Retirement Fund, through BLB&G, brought a putative class action in this Court against Defendants, alleging violations of the Securities Exchange Act of 1934 (the "Exchange Act"). Dkt. No. 1.

11. In accordance with the Private Securities Litigation Reform Act of 1995 ("PSLRA"), BLB&G arranged for publication of notice in a national newswire service on February 6, 2024, advising potential class members of the pendency of the action, the claims asserted, and the deadline by which putative class members could move the Court for appointment as lead plaintiff. Dkt. No. 9.

C. Appointment of Lead Plaintiff and Lead Counsel

12. On April 8, 2024, Oklahoma Firefighters moved for appointment as Lead Plaintiff. Dkt. No. 15. On May 15, 2024, the Court entered an order appointing Oklahoma Firefighters as Lead Plaintiff for the Action and approving its selection of BLB&G as Lead Counsel. Dkt. No. 23.

D. Lead Plaintiff's Investigation and Filing of the Complaint

13. In connection with this matter, Lead Counsel undertook an extensive investigation into the alleged fraud and potential claims that could be asserted in the Action. The investigation included a thorough review of public information such as iRhythm's SEC filings; Defendants' additional public statements, including those made in press releases, at investor conferences, and on earnings calls; analyst reports concerning iRhythm; and other publicly available information regarding the Company. In addition, Lead Counsel submitted Freedom of Information Act ("FOIA") requests to the FDA to obtain certain non-public information, including iRhythm's response to the FDA's August 2022 FDA Form 483 inspection report.

14. In connection with its investigation, Lead Counsel and its in-house investigators also conducted an extensive search to locate former employees of iRhythm and other industry participants who might have relevant information pertaining to the claims asserted in the Action. This included contacting over 285 former iRhythm employees believed to possess potentially relevant information. Lead Counsel and/or its in-house investigators spoke to 69 of these individuals, and Lead Counsel included detailed information received from three of these former iRhythm employees in the Complaint.

15. On July 19, 2024, Lead Plaintiff filed and served the Amended Class Action Complaint for Violations of the Federal Securities Laws. Dkt. No. 36. Following further investigation and review of additional materials, on October 11, 2024, Lead Plaintiff filed and served the Second Amended Class Action Complaint. Dkt. No. 43 (the "Complaint"). The detailed, 257-paragraph Complaint asserted claims under Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and SEC Rule 10b-5, 17 C.F.R. § 240.10b-5, promulgated thereunder, against all

1 Defendants; and claims under Section 20(a) of the Exchange Act, 15 U.S.C. § 78t(a), against Mr.
2 Blackford and certain former individual defendants.

3 16. The Complaint alleged that during the period from November 5, 2021 through
4 August 9, 2024, inclusive, Defendants made materially false and misleading statements or
5 omissions concerning the capabilities of iRhythm's Zio AT device. The Complaint alleged that
6 such statements were false and misleading because (1) the Zio AT contained an undisclosed
7 transmission limit that prevented the device from providing "near real-time" notifications of
8 arrhythmias to physicians once the limit was reached; (2) because of this transmission limit, the
9 device was inappropriate and even dangerous for the "high-risk" patients for whom Defendants
10 promoted it; (3) the FDA had never cleared the Zio AT to be marked as a "mobile cardiac
11 telemetry" or "MCT" device for high-risk patients; and (4) the Company's technicians were
12 routinely misreading patients' arrhythmia data, resulting in the transmission of inaccurate reports
13 to patients and physicians. The Complaint further alleged that the price of iRhythm's common
14 stock was artificially inflated during the Class Period, and declined over a series of partial
15 corrective disclosures beginning on November 1, 2022. The Complaint alleged that the truth was
16 revealed through FDA Form 483 inspection reports, a warning letter, a Department of Justice
17 ("DOJ") enforcement action, and a report by Capitol Forum revealing over 4,000 patient
18 complaints concerning data inaccuracies.

19 **E. Defendants' Motion to Dismiss**

20 17. On December 10, 2024, Defendants filed and served a motion to dismiss the
21 Complaint and a request for judicial notice. Dkt. Nos. 51, 52. The motion included over 1,100
22 pages of briefing and exhibits. In the motion, Defendants argued that the Complaint should be
23 dismissed because Lead Plaintiff had not alleged any materially false and misleading statements
24 made by Defendants during the Class Period; that certain challenged statements were vague, non-
25 actionable, or otherwise not false; that the Complaint failed to allege facts giving rise to a strong
26 inference of scienter; and that the Complaint failed to adequately plead loss causation.
27 Specifically, Defendants argued, among other things, that (i) Defendants' statements concerning
28

1 “high-risk” patients were not false because Lead Plaintiff improperly conflated “high-risk” with
2 “critical care” patients, a population for which iRhythm had disclosed the Zio AT was
3 contraindicated, (ii) Defendants’ statements that the Zio AT provided “near real-time” or “timely”
4 transmissions were vague and imprecise and thus not actionable, and the transmission limit was
5 disclosed on iRhythm’s website and in Zio AT labeling, (iii) Lead Plaintiff failed to plead that
6 “MCT” had a universal and well-understood meaning, and thus Defendants’ characterization of
7 the Zio AT as an MCT device could not be evaluated for falsity, (iv) Lead Plaintiff’s reliance on
8 customer complaints and reports from anonymous former employees was insufficient to establish
9 the falsity of Defendants’ accuracy statements, and (v) the 2022 Form 483 was merely interim
10 FDA feedback—not a final agency determination—and could not support an inference of scienter,
11 particularly because Defendants promptly disclosed the FDA correspondence while
12 simultaneously increasing their holdings in iRhythm stock.

13 18. Defendants’ motion was supported by numerous exhibits including, among other
14 documents, iRhythm’s response to the FDA’s Form 483, the Zio AT clinical reference manual,
15 FDA correspondence, conference call transcripts, and SEC filings. Dkt. Nos. 51-2 to 51-21.
16 Defendants argued that the Court should consider these exhibits because they were either
17 incorporated into the complaint by reference or were matters of which a court may take judicial
18 notice. Dkt. No. 52.

19 19. On January 29, 2025, Lead Plaintiff filed and served a 25-page memorandum of
20 law in opposition to Defendants’ motion to dismiss (Dkt. No. 66) and an opposition to Defendants’
21 request for judicial notice (Dkt. No. 68). Lead Plaintiff explained that the Complaint adequately
22 identified the false and misleading statements and omissions, detailed the reasons why each
23 challenged statement was false or omitted material facts, and raised a strong inference of scienter.
24 Specifically, Lead Plaintiff argued that (i) Defendants’ “high-risk” statements were materially
25 misleading because the FDA had expressly found that the Zio AT was not cleared for use with
26 “high-risk” patients and that the device’s known transmission limit rendered it “hazardous” for
27 precisely the patient population Defendants were targeting; (ii) Defendants’ “near real-time” and
28

1 “timely transmission” statements were actionable, verifiable statements of fact; (iii) the FDA’s
2 Warning Letter explicitly found that characterizing the Zio AT as an MCT “implies this device is
3 intended for high-risk patients and near real-time monitoring,” which it was not; and (iv) over
4 4,000 complaints concerning technician misreading of arrhythmia data, corroborated by former
5 employees’ firsthand accounts that they were instructed to provide inaccurate reports, adequately
6 alleged the falsity of Defendants’ accuracy statements. Lead Plaintiff further argued that scienter
7 was supported by, among other things, Defendants’ admission in their FDA correspondence that
8 the transmission limit was a “known design constraint” posing a “hazardous situation,” extensive
9 adverse event reporting, and certain individual defendants’ membership on iRhythm’s
10 Compliance Committee, which received adverse event reports on a monthly basis.

11 20. Lead Plaintiff also objected in part to Defendants’ request for judicial notice to the
12 extent that Defendants sought to introduce extrinsic documents to dispute the well-pled facts in
13 the Complaint. Dkt. No. 68.

14 21. On March 10, 2025, Defendants filed and served reply papers in support of their
15 motion to dismiss. Dkt. No. 70.

16 22. On April 22, 2025, the Court issued a tentative ruling granting in part and denying
17 in part Defendants’ motion to dismiss. Dkt. No. 72. On April 24, 2025, the Parties participated in
18 oral argument concerning Defendants’ motion to dismiss. Dkt. No. 73.

19 23. On June 3, 2025, the Court entered an Order granting in part and denying in part
20 Defendants’ motion to dismiss. Dkt. No. 77. The Court sustained Lead Plaintiff’s Section 10(b)
21 claims against iRhythm and Defendant Blackford with respect to statements made after July 25,
22 2022 regarding the Zio AT’s timeliness, accuracy, and appropriateness for high-risk patients. The
23 Court dismissed claims against all remaining former individual defendants, dismissed all other
24 alleged misstatements, and dismissed Lead Plaintiff’s Section 20(a) claims. The Court’s order
25 thus effectively limited the Class Period to July 25, 2022 to August 9, 2024, and dismissed over
26 30 alleged false statements.

F. Defendants' Motion for Judgment on the Pleadings

24. On July 16, 2025, Defendants filed their answer to the Complaint. Dkt. No. 87. Defendants' Answer denied Lead Plaintiff's allegations of wrongdoing and asserted forty affirmative defenses to the claims asserted including, among others, truth on the market, lack of price impact, lack of reliance by plaintiffs, and Defendants' reasonable reliance on expert opinions.

25. On July 18, 2025, Defendants filed a motion for judgment on the pleadings under Rule 12(c). Dkt. No. 88. Defendants argued that Lead Plaintiff's remaining claims should be dismissed because Lead Plaintiff could not establish scienter or loss causation in light of iRhythm's extensive disclosures of Zio AT's transmission limit. The motion further argued that certain of Defendants' statements whose alleged falsity was predicated on a former employee's account concerning the "lag time" of the device should be dismissed because the Complaint contained no allegations that Defendant Blackford knew about the supposed lag, and because none of the seven alleged corrective disclosures referenced "lag time." *Id.*

26. On August 15, 2025, Lead Plaintiff filed its opposition to Defendants' motion for judgment on the pleadings (Dkt. No. 96), and on September 5, 2025, Defendants filed their reply (Dkt. No. 100).

27. On November 7, 2025, the Court denied Defendants' motion, rejecting Defendants' arguments concerning issues "the Court already ruled otherwise" on, and noting that Defendants' motion "essentially requests the Court reconsider" its ruling on the motion to dismiss. Dkt. No. 112.

G. The Parties Conduct Extensive Fact Discovery

28. Discovery in the Action commenced following the Court's June 3, 2025 partial denial of Defendants' motion to dismiss.

29. Lead Plaintiff served its First Set of Requests for the Production of Documents to Defendants on June 13, 2025. Lead Plaintiff's requests sought, among other things, documents relating to the related DOJ investigation and the DOJ action; the Zio AT's transmission

1 capabilities, transmission limits, and battery constraints; the intended patient population for the
2 Zio AT; correspondence with the FDA; and the marketing of the Zio AT. On the same date, Lead
3 Plaintiff served its First Set of Interrogatories on Defendants, propounding six interrogatories
4 seeking, among other things, identification of third parties retained to investigate the Zio AT's
5 development and FDA approval, members of iRhythm's Compliance Committee, employees who
6 communicated with the FDA concerning the Zio AT, employees responsible for marketing the Zio
7 AT, and persons who authored, drafted, reviewed or approved the challenged statements.
8 Defendants subsequently served their responses and objections.

9 30. On June 27, 2025, the Parties exchanged their Initial Disclosure Statements
10 pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

11 31. On July 2, 2025, following extensive meet-and-confers, the Parties submitted a
12 Joint Case Management Statement to the Court, which discussed the facts, issues, and history of
13 the case and set forth the Parties' views on the scope of discovery to be conducted, e-discovery
14 procedures, and proposed scheduling. Dkt. No. 83. The statement disclosed that Defendants
15 anticipated filing a motion for judgment on the pleadings under Rule 12(c), which Defendants
16 contended would trigger an automatic stay of all discovery under the PSLRA. In response, Lead
17 Plaintiff argued that the stay did not apply, arguing that the PSLRA's plain language stays
18 discovery only "during the pendency of any motion to dismiss." The statement also outlined the
19 Parties' dispute concerning the scope and timing of document discovery, particularly regarding
20 documents iRhythm had previously produced to the DOJ in response to the DOJ's related
21 investigation. Dkt. No. 83. On July 9, 2025, the Court held a case management conference by
22 videoconference (Dkt. No. 85), but did not rule on the discovery disputes raised in the joint case
23 management statement, and instead directed the Parties to brief the discovery stay question
24 through joint letter briefings. *See infra* ¶ 46. On July 9, 2025, the Court entered a case schedule.
25 Dkt. No. 86.

26 32. The Parties filed an additional case management statement on September 10, 2025,
27 in advance of the Parties' case management conference scheduled for September 17, 2025. Dkt.
28

1 No. 103. The statement reflected that, while the Parties had reached agreement on the scope of
2 virtually all of Lead Plaintiff's discovery requests, the Parties continued to dispute the
3 reproduction of documents iRhythm had previously produced to the DOJ, and disputed (1) the
4 appropriate time period for production of documents concerning customer complaints and adverse
5 event reports, and (2) search terms and custodians. *Id.*

6 33. On September 15, 2025, the Court continued the case management conference
7 scheduled for September 17, 2025 and ordered the Parties to meet and confer on the issues raised
8 in person at Lead Counsel's office in New York City on October 7, 2025, and file an additional
9 case management statement outlining the status of their ongoing discovery disputes by October
10 22, 2025. Dkt. No. 104. On October 22, 2025, the parties filed their third joint case management
11 statement, which reported to the Court that the Parties had met and conferred both in person and
12 via telephone on several other occasions, and worked cooperatively to reach resolution on the
13 issues previously raised. Dkt. No. 109.

14 34. Meanwhile, on August 12, 2025, Defendants served to Lead Plaintiff their First
15 Set of Document Requests, propounding 31 document requests. Defendants' requests sought,
16 among other things, documents concerning iRhythm and Defendant Blackford, documents
17 concerning the allegations in the Complaint and the sources of such allegations, documents
18 concerning the corrective disclosures alleged in the Complaint, communications between Lead
19 Plaintiff and present or former iRhythm employees, documents concerning Lead Plaintiff's
20 transactions in iRhythm securities and its investment decision-making, and documents concerning
21 class certification. On the same date, Defendants served their First Set of Interrogatories on Lead
22 Plaintiff, propounding four interrogatories seeking, among other things, identification of Lead
23 Plaintiff's transactions in iRhythm securities, persons involved in investment decisions, and the
24 identities of the former employees relied upon in the Complaint. Lead Plaintiff subsequently
25 served its responses and objections.

26 35. On September 29, 2025, Defendants served to Lead Plaintiff their First Set of
27 Requests for Admission, to which Lead Plaintiff served its responses and objections.
28

1 36. The Parties also negotiated the terms of the protective order governing the
2 treatment of documents and other information produced in discovery, which the Parties submitted
3 to the Court on September 29, 2025 (Dkt. No. 105), and which the Court entered as an order on
4 September 30, 2025 (Dkt. No. 108). The Parties also negotiated, and the Court so-ordered on
5 September 30, 2025, the Stipulation and Order Establishing the Protocol for the Production of
6 Documents and Electronically Stored Information. Dkt. No. 107.

7 37. Lead Plaintiff served to Defendants its First Set of Requests for Admission and
8 Second Set of Interrogatories on November 13, 2025, to which Defendants served their responses
9 and objections. Defendants served to Lead Plaintiff their Second Set of Requests for Admission
10 on December 2, 2025, to which Lead Plaintiff served its responses and objections.

11 **1. Document Discovery**

12 38. Defendants began the production of documents on June 30, 2025. In the months
13 that followed, Lead Counsel engaged in numerous meet-and-confers with counsel for Defendants
14 and conducted extensive negotiations over the scope and adequacy of Defendants' discovery
15 responses, including relating to the search terms to be used and the date range with which
16 documents would be searched and produced. The Parties submitted multiple joint statements and
17 letters concerning discovery disputes, including concerning the scope of document production, to
18 the Court. After hard-fought negotiations, Defendants agreed to produce many of the materials
19 requested by Lead Plaintiff.

20 39. Lead Plaintiff also subpoenaed eight non-parties, including various consultants
21 and a law firm that was retained by iRhythm in 2022 to advise iRhythm regarding the FDA's
22 investigation and related concerns. In addition, Defendants served a document subpoena on the
23 outside investment manager for Lead Plaintiff and that investment manager produced documents
24 to Defendants.

25 40. In response to Lead Plaintiff's requests for production of documents and
26 subpoenas, Defendants and non-parties produced approximately 400,000 pages of documents to
27 Lead Plaintiff. A team of attorneys at Lead Counsel reviewed, analyzed, and coded the documents
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1 received. In reviewing the documents, attorneys were tasked with making several analytical
2 determinations as to the documents' importance and relevance. Specifically, they determined
3 whether the documents were "hot," "relevant," or "not relevant." They also assessed which
4 specific key issues the documents concerned. Lead Counsel's partners structured the document
5 review to include regular team meetings to discuss the documents of highest interest and other
6 issues that arose during the document review. Through these meetings, Lead Counsel ensured that
7 all attorneys involved in the review understood the developing nature of the evidence and focused
8 document review on the key issues in the Action.

9 41. Lead Counsel also assisted Lead Plaintiff in searching for and producing
10 documents in its own files responsive to Defendants' requests for production of documents. Lead
11 Plaintiff served several initial and supplemental responses and objections to Defendants' requests
12 for production and began producing documents to Defendants in September 2025. In total, Lead
13 Plaintiff produced over 5,900 pages of documents to Defendants in response to their requests.
14 Lead Plaintiff also responded to interrogatories propounded by Defendants.

15 2. Depositions

16 42. Lead Counsel took or defended seven depositions that occurred prior to the Parties'
17 agreement to settle. In December 2025, Lead Counsel defended three depositions taken by
18 Defendants in connection with Lead Plaintiff's motion for class certification: the deposition of
19 Lead Plaintiff's Rule 30(b)(6) representative (Oklahoma Firefighters' Executive Director Chase
20 Rankin), Lead Plaintiff's investment manager, and Lead Plaintiff's expert on market efficiency
21 and class-wide damages (Dr. Matthew Cain). In early 2026, Lead Counsel took four depositions.
22 Lead Plaintiff deposed two fact witnesses who were current employees at iRhythm and two of
23 Defendants' expert witnesses—their medical expert, Dr. George Thomas, and their damages
24 expert, Dr. Douglas Skinner. These depositions required significant time devoted to preparation,
25 including reviewing documents and drafting preparation materials to facilitate questioning.

26 43. In addition to the seven depositions taken, Lead Plaintiff had scheduled eight
27 additional depositions at the time the Settlement was reached, including of Defendant Blackford
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1 and additional fact witnesses who were current or former iRhythm employees. These depositions
2 were scheduled to occur between April and June 2026. Lead Counsel incurred significant time
3 preparing for these depositions before the agreement in principle to settle was reached, including
4 by reviewing voluminous document discovery relevant to the depositions and drafting preparation
5 materials, including proposed questions and document exhibits.

6 **3. Discovery Disputes**

7 44. As prefaced above, discovery in the Action was highly contested. Lead Counsel
8 and Defendants' Counsel exchanged numerous letters and participated in numerous meet-and-
9 confer sessions regarding, among other things, the scope of the documents collected and
10 produced, the adequacy of the search terms and date range of productions, and the adequacy of
11 responses to interrogatories.

12 45. Despite many extensive and good-faith negotiations, the Parties could not resolve
13 certain disputes without Court intervention. Accordingly, the Parties filed two joint letter briefs
14 concerning discovery disputes on July 29, 2025 and March 17, 2026, concerning, respectively,
15 (a) the applicability of the PSLRA discovery stay to Defendants' motion for judgment on
16 pleadings, and (b) the production of potentially privileged documents.

17 46. With respect to the first dispute, Defendants contended that their motion for
18 judgment on pleadings under Rule 12(c) triggered an automatic stay of discovery under the
19 PSLRA. Defendants argued that a Rule 12(c) motion was functionally identical to a Rule 12(b)(6)
20 motion for purposes of the PSLRA's mandatory stay. Lead Plaintiff opposed the stay, arguing that
21 the PSLRA's plain language stays discovery only "during the pendency of any motion to dismiss."
22 Lead Plaintiff further argued that even if the stay applied, the Court should modify the stay to
23 require Defendants to produce documents and transcripts already produced to the DOJ. Dkt. No.
24 94. On August 6, 2025, the Court ruled that the PSLRA stay of discovery does not apply to a
25 motion for judgment on the pleadings, and thus, discovery was not stayed while Defendants' Rule
26 12(c) motion was pending. Dkt. No. 95.

1 47. In the second discovery dispute that required briefing to the Court, Defendants
2 took the position that they did not need to produce all communications between iRhythm's
3 counsel and the DOJ regarding the DOJ investigation, and opposed Lead Plaintiff's challenge to
4 Defendants' clawback of a single produced document reflecting DOJ-iRhythm communications.
5 Lead Plaintiff argued that the communications at issue were essential to test the scope and nature
6 of the DOJ's investigation and to rebut Defendants' anticipated loss causation and damages
7 arguments. Lead Plaintiff also argued that non-privileged portions of the clawed-back document
8 should be produced with any privileged portion redacted. Defendants countered that the demand
9 was based on hypothetical, unasserted arguments, that Lead Plaintiff already had the documents
10 necessary to identify the scope and nature of the DOJ investigation, including the subpoena and
11 enforcement petition, and that the documents Lead Plaintiff requested did not exist. Defendants
12 further argued that the clawed-back document was an inadvertently produced, privileged email
13 chain between iRhythm's counsel and its client, and that the weight of authority supported treating
14 the entire chain as privileged. Dkt. No. 146. The Court did not have an opportunity to rule on this
15 dispute prior to the Parties' decision to settle.

16 48. As discussed above, the Parties also set forth discovery disputes in their first and
17 second joint case management statements, which they subsequently resolved without Court
18 intervention. Dkt. Nos. 83, 103.

19 **H. Lead Plaintiff's Motion for Class Certification**

20 49. On November 3, 2025, Lead Plaintiff filed its motion to certify a class of all
21 persons who purchased or otherwise acquired iRhythm common stock from July 25, 2022 through
22 August 9, 2024, inclusive (the "Class Period"), and were damaged thereby. Dkt. No. 114. The
23 motion was supported by an expert report by Dr. Matthew Cain, Lead Plaintiff's market efficiency
24 and damages expert. Dkt. No. 114-3. In his report, Dr. Cain opined that iRhythm's common stock
25 traded in an efficient market during the Class Period and that per-share damages could be
26 measured for all class members using a common methodology.

1 50. As noted above, in connection with the motion for class certification, Defendants
2 took Rule 30(b)(6) depositions of Oklahoma Firefighters and Oklahoma Firefighters' investment
3 manager and the deposition of Dr. Cain in December 2025.

4 51. On January 5, 2026, Defendants filed their opposition to Lead Plaintiff's motion
5 for class certification. Dkt. No. 120. In their opposition, Defendants conceded the adequacy of
6 Lead Plaintiff, typicality, predominance of common questions, and market efficiency. However,
7 Defendants argued that: (i) Lead Plaintiff lacked a class-wide damages model; (ii) the alleged
8 misstatements were too "generic" to have impacted iRhythm's stock price under *Goldman Sachs*
9 *Group, Inc. v. Arkansas Teacher Retirement System*, 594 U.S. 113, 123 (2021); and (iii) certain
10 corrective disclosure information was not "new" and therefore could not have caused a price
11 decline.

12 52. On February 9, 2026, Lead Plaintiff filed its reply brief. Dkt. No. 129. On February
13 26, 2026, the Court held a hearing on the motion for class certification. Dkt. Nos. 136, 144. On
14 March 2, 2026, Defendants filed a sur-reply brief. Dkt. No. 137. The motion for class certification
15 remained pending at the time the Settlement was reached.

16 **I. Work with Experts**

17 53. Throughout the Action, Lead Plaintiff retained a highly qualified expert in
18 financial economics as well as consultants in various disciplines including FDA regulation of
19 medical devices, market efficiency, and damages to assist in the prosecution of this Action. Lead
20 Counsel consulted extensively with Lead Plaintiff's principal financial expert, Dr. Cain, as well
21 as additional experts in loss causation and damages, including in preparing the Complaint, in
22 reviewing documents produced in discovery, and in preparation for settlement negotiations. In
23 addition, after the Settlement was reached, Lead Counsel worked with Dr. Cain's team to develop
24 the Plan of Allocation.

25 **J. The Parties' Mediation Efforts and the Settlement of the Action**

26 54. The Parties began exploring the possibility of a mediation in early 2026. The
27 Parties conferred and selected David Murphy of Phillips ADR Enterprises to serve as the mediator
28

1 for the Action. Mr. Murphy is an experienced mediator of securities class actions and other
2 complex litigation.

3 55. In advance of the mediation, the Parties prepared and exchanged detailed
4 mediation statements addressing issues of liability and damages. Lead Plaintiff's mediation
5 statement set forth, among other things, Lead Plaintiff's analysis of the strength of its claims, the
6 evidence supporting those claims, and an estimate of maximum recoverable damages. Defendants
7 submitted their own mediation statement challenging Lead Plaintiff's claims and damages
8 analysis.

9 56. On April 2, 2026, the Parties participated in a full-day mediation session with Mr.
10 Murphy. Despite extensive good-faith negotiations, the Parties were unable to reach a resolution
11 at the mediation session. In the weeks following the mediation, Mr. Murphy continued discussions
12 with the Parties and ultimately made a mediator's recommendation of \$45,000,000, which the
13 Parties accepted on May 4, 2026.

14 57. On May 13, 2026, the Parties' agreement-in-principle to settle the Action was
15 memorialized in a term sheet. Over the next few weeks, the Parties negotiated the full terms of
16 the Settlement and drafted the Stipulation and related papers.

17 58. On June 3, 2026, the Parties entered into the Stipulation, which sets forth the terms
18 of the Parties' agreement to settle all claims asserted in the Action for \$45,000,000, subject to the
19 Court's approval. Dkt. No. 147-1. That same day, Lead Plaintiff and iRhythm also entered into a
20 confidential Supplemental Agreement, which provides that iRhythm has the right to terminate the
21 Settlement if the persons who request exclusion from the Settlement Class reach a certain
22 threshold.

23 **K. The Court Grants Preliminary Approval of the Settlement**

24 59. On June 4, 2026, Lead Plaintiff filed a motion for preliminary approval of the
25 Settlement (Dkt. No. 147), which included supporting declarations from Lead Plaintiff's damages
26 expert discussing the range of potential damages that could be established at trial and the basis
27 for the Plan of Allocation (Dkt. No. 147-3), from Lead Counsel concerning the risks of litigation
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1 and other matters (Dkt. No. 147-4), and from the proposed Claims Administrator, SCS (Dkt. No.
2 147-5).

3 60. The Court held a Zoom hearing on the motion on July 10, 2026. Dkt. Nos. 152,
4 154. On July 13, 2026, the Court entered its Order re Motion for Preliminary Approval (Dkt. No.
5 156) (the “Preliminary Approval Order”) which, among other things: (a) preliminarily approved
6 the Settlement; (b) approved the form of Notice, Summary Notice, and Claim Form;
7 (c) authorized notice to be provided to Settlement Class Members through mailing and emailing
8 of the Notice and Claim Form, posting of the Notice and Claim Form on a Settlement website,
9 and publication of the Summary Notice in *The Wall Street Journal* and over the *PR Newswire*;
10 (d) established procedures and deadlines by which Settlement Class Members could participate
11 in the Settlement, request exclusion from the Settlement Class, or object to the Settlement, the
12 proposed Plan of Allocation, and/or the fee and expense application; and (e) set a schedule for the
13 filing of opening papers and reply papers in support of the proposed Settlement, Plan of
14 Allocation, and the Fee and Expense Motion. The Court also scheduled the Settlement Hearing
15 for November 5, 2026 at 9:00 a.m. to determine, among other things, whether the Settlement
16 should be finally approved.

17 **II. THE RISKS OF THE LITIGATION**

18 61. The Settlement provides a certain and substantial benefit to the Settlement Class
19 in the form of a \$45,000,000 cash payment. Lead Plaintiff and Lead Counsel believe that the
20 proposed Settlement is a favorable result for the Settlement Class.

21 62. As explained in the Motion and below, Lead Plaintiff faced meaningful risks in
22 this Action from the outset with respect to proving liability and recovering full damages in this
23 case. To prevail in this case, Lead Plaintiff had the burden to convince a unanimous jury by a
24 preponderance of the evidence of each of the elements of their claims, including that
25 (1) Defendants made misstatements; (2) the misstatements were material; (3) the misstatements
26 were made with *scienter* (i.e., knowingly or with deliberate recklessness); (4) investors relied
27 upon the misstatements; and (5) Defendants’ fraud caused investors’ losses.

63. While Lead Plaintiff had sustained its claims in part following the pleading stage of the Action, absent a settlement, Lead Plaintiff would still need to prevail at several additional stages of the litigation, including defeating Defendants' opposition to Lead Plaintiff's motion for class certification, Defendants' anticipated motion for summary judgment, at trial, and on appeal. At each of these stages, Lead Plaintiff would have faced significant risks related to establishing liability and full damages, including, among other things, overcoming Defendants' falsity, scienter, and loss causation challenges. Even after any trial, Lead Plaintiff would have faced post-trial motions, including a potential motion for judgment as a matter of law, as well as further appeals that might have prevented Lead Plaintiff from successfully obtaining a recovery for the Settlement Class.

A. General Risks in Prosecuting Securities Class Actions

64. In recent years, securities class actions have faced greater risks than in prior years, and it is not uncommon for district courts to dismiss securities class actions at the summary judgment stage. *See, e.g., Homyk v. ChemoCentryx, Inc.*, 2025 WL 4110430, at *14 (N.D. Cal. Aug. 15, 2025) (granting summary judgment on all claims in securities class action after four years of litigation); *In re Mylan N.V. Sec. Litig.*, 666 F. Supp. 3d 266, 328 (S.D.N.Y. 2023) (defendants prevailed at summary judgment in a securities class action against Mylan arising out of misstatements concerning the company's EpiPen product and other generic drugs); *Murphy v. Precision Castparts Corp.*, 2021 WL 2080016, at *1 (D. Or. May 24, 2021) (granting defendants' renewed motion for summary judgment based on recent Ninth Circuit decision on forward-looking statements), *aff'd sub nom., AMF Pensionsforsakring AB v. Precision Castparts Corp.*, 2022 WL 2800825 (9th Cir. July 18, 2022); *see also Fosbre v. Las Vegas Sands Corp.*, 2017 WL 55878, at *28 (D. Nev. Jan. 3, 2017), *aff'd sub nom., Pompano Beach Police & Firefighters' Ret. Sys. v. Las Vegas Sands Corp.*, 732 F. App'x 543 (9th Cir. 2018); *In re Omnicom Grp., Inc. Sec. Litig.*, 541 F. Supp. 2d 546, 554-55 (S.D.N.Y. 2008), *aff'd*, 597 F.3d 501 (2d Cir. 2010); *In re Xerox Corp. Sec. Litig.*, 935 F. Supp. 2d 448, 496 (D. Conn. 2013), *aff'd sub nom., Dalberth v. Xerox Corp.*, 766 F.3d 172 (2d Cir. 2014).

65. Even cases that have survived summary judgment can be dismissed prior to trial in connection with Daubert motions, such as those likely to be filed by Defendants here. *See, e.g., Bricklayers & Trowel Trades Int’l Pension Fund v. Credit Suisse First Boston*, 853 F. Supp. 2d 181, 197-98 (D. Mass. 2012), *aff’d sub nom. Bricklayers & Trowel Trades Int’l Pension Fund v. Credit Suisse Sec. (USA) LLC*, 752 F.3d 82 (1st Cir. 2014) (granting summary judgment *sua sponte* in favor of the defendants after finding that the event study offered by plaintiffs’ expert was unreliable and that there was accordingly no evidence that the market reacted negatively to disclosures).

66. Even when securities class action plaintiffs successfully overcome multiple substantive and procedural hurdles before trial, there remain significant risks that a jury will not find the defendants liable or award expected damages. *See, e.g., In re Tesla Inc., Sec. Litig.*, 2023 WL 4032010 (N.D. Cal. June 14, 2023), *aff’d*, 2024 WL 4688894 (9th Cir. Nov. 6, 2024) (defense verdict in securities class action even though the court had already found the statements were false and defendant had acted recklessly in issuing them, and the same conduct had resulted in SEC charges and a settlement).

67. Further, post-trial motions, based on a complete record, also present substantial risks. For example, in *In re BankAtlantic Bancorp, Inc.*, following a jury verdict in the plaintiffs’ favor, the district court granted the defendants’ motion for judgment as a matter of law and entered judgment in favor of the defendants on all claims. 2011 WL 1585605, at *14, 22 (S.D. Fla. Apr. 25, 2011), *aff’d sub nom.*, 688 F.3d 713 (11th Cir. 2012) (finding that there was insufficient trial evidence to support a finding of loss causation).

68. Intervening changes in the law may also impact a favorable court decision or a successful trial verdict. For example, a district court in Oregon reconsidered its order denying defendants’ motion for summary judgment and granted the motion more than a year later based on a new decision by the Ninth Circuit. *See Precision Castparts*, 2021 WL 2080016, at *6.

69. Accordingly, securities class actions face serious risks of dismissal and non-recovery at all stages of litigation.

B. Specific Risks Concerning This Action

70. Lead Plaintiff and Lead Counsel believe the claims asserted against Defendants in this action are meritorious. They recognize, however, that this Action presented meaningful risks to establishing liability, loss causation, and damages from the outset that could have prevented Lead Plaintiff and the class from achieving any recovery. As discussed further below, Defendants have vigorously argued that their challenged statements about the Zio AT were not false or misleading when made, and, in any event, even if any of their statements were false or misleading, Defendants did not have any intent to mislead investors.

1. Risks Concerning Liability

71. As discussed further below, Defendants vigorously argued that their challenged statements about the Zio AT were not false or misleading when made, and, in any event, Defendants did not have any intent to mislead investors.

a. Falsity

72. Lead Plaintiff and Lead Counsel recognized that there were significant risks from the outset of the case in establishing that all of Defendants' statements were materially false and misleading when made and actionable under the securities laws. While Lead Plaintiff and Lead Counsel prevailed in substantial part on these issues at the motion to dismiss stage, they may have been unable to withstand some or all of Defendants' arguments at summary judgment or convince a jury of Defendants' liability.

73. Among other things, Defendants have contended and would continue to argue that the statements were not false because the Zio AT's transmission limits were disclosed no later than November 2022. Defendants would further argue that, even if the Court found that the transmission limits were not publicly disclosed, Lead Plaintiff could not show that the transmission limits impacted the Zio AT functionality enough to render the statements false. Defendants would also argue—as they did at class certification—that prescribing physicians universally understood the Zio AT's technical limitations. Defendants would further assert that their marketing claims complied with FDA regulations and were consistent with those of

1 companies with competing mobile cardiac telemetry devices. While Lead Plaintiff believed it had
2 strong counterarguments, including FDA assessments that the device was “not remotely capable”
3 of “near-real time” alerts, there was a risk that a factfinder could credit Defendants’ technical
4 medical testimony at trial.

5 74. Defendants would further argue that statements concerning the device’s suitability
6 for high-risk patients were not false because they were vague and qualified by express warnings
7 that the device was not intended for use in critical care patients or patients with known history of
8 life threatening arrhythmias.

9 75. Defendants have also argued, and would continue to argue, that their statements
10 with regard to the accuracy of the Zio AT monitor were literally true as far as Defendants knew at
11 the time the statements were made. Defendants would argue that the statements concerning
12 accuracy do not reference the Zio AT or the Zio AT reports specifically—rather, they address the
13 Zio products as a whole; thus, these statements cannot be rendered false by Lead Plaintiff’s
14 allegations that the Zio AT reports created by technicians were inaccurate. Defendants would
15 further argue that there is no evidence that the market was concerned by the 4,014 complaints
16 concerning the accuracy of the device. Defendants presented evidence of periodic reports
17 provided to Defendant Blackford reflecting accuracy rates between 98% and 99% for the Zio AT.
18 Dismissal of the alleged misstatements about accuracy was a particularly substantial risk because
19 Defendants’ statements concerning the accuracy of the device were the only false statements at
20 issue for a significant portion of the Class Period. Therefore, as discussed below, if the Court or
21 a jury were to rule against Lead Plaintiff with respect to these statements, maximum potential
22 damages would be significantly reduced, declining by approximately 40%.

23 **b. Scier**

24 76. Even if Lead Plaintiff proved that Defendants’ statements were false or misleading,
25 Lead Plaintiff would still need to demonstrate to a jury that Defendants made the misstatements
26 with scier—*i.e.*, an intent to defraud or with deliberate recklessness. Defendants vigorously
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1 argued that they believed their statements to be true and that they had no intent to commit fraud.
2 Thus, proving Defendants' scienter was a major risk in the Action from the outset.

3 77. Defendants' technical arguments with respect to falsity also would have supported
4 their position on scienter—that they subjectively believed their statements were truthful. Indeed,
5 Defendants would have argued that disclosures about the transmission limits and their impact on
6 Zio AT functionality undermine Lead Plaintiff's scienter allegations. Defendants would also rely
7 on the above-mentioned reports, among other evidence, to attempt to establish that Defendant
8 Blackford honestly believed his statements about the Zio AT's accuracy and, therefore, did not
9 act with the intent to deceive investors.

10 2. Risks Concerning Loss Causation and Damages

11 78. Even assuming that Lead Plaintiff and Lead Counsel overcame Defendants'
12 arguments and established liability at trial, Lead Plaintiff still confronted additional significant
13 challenges in establishing loss causation and damages.

14 79. Lead Plaintiff and Lead Counsel anticipate that Defendants would argue at
15 summary judgment, trial, and subsequent stages of the proceedings, that the declines in the price
16 of iRhythm common stock were not caused entirely—or at all—by the alleged corrective
17 disclosures. At class certification, Defendants argued vigorously under the Supreme Court's
18 decision in *Goldman Sachs Group, Inc. v. Arkansas Teacher Retirement System*, 594 U.S. 113
19 (2021), that there was a “mismatch” between the alleged misstatements and the corrective
20 disclosures. Specifically, Defendants contended that the statements concerning the device's “near
21 real time” and “timely transmission” capabilities were generic and did not substantively match
22 the detailed corrective disclosures, and thus those disclosures could not demonstrate that the
23 statements had maintained artificial inflation.

24 80. Defendants would have also argued that the FDA warning letter, published May
25 30, 2023, fully disclosed the alleged misrepresentations concerning the Zio AT's transmission
26 limit. If credited, Defendants' argument would have reduced maximum recoverable damages from
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1 approximately \$698 million to approximately \$526 million—a reduction of nearly 25%. Dkt. No.
2 147-3, at ¶ 21.

3 81. Defendants would have further argued that Lead Plaintiff’s expert’s event study
4 methodology was not accurate in isolating the impact of the alleged fraud from confounding
5 information and non-fraud-related factors that may have contributed to iRhythm’s stock price
6 declines. At class certification, Defendants challenged Lead Plaintiff’s proposed damages model
7 on the grounds that it failed to adequately account for time-varying inflation and confounding
8 information.

9 82. Finally, if a Court or a jury agreed with Defendants’ argument that the November
10 1, 2022 disclosure effectively corrected Defendants’ statements concerning the “near real time”
11 and “timely transmission” of the device, and that subsequent disclosures did not reveal new
12 corrective information, damages would be substantially reduced.

13 83. Therefore, the risks presented by the litigation were significant, and the class’s
14 ultimate potential for recovery was always in question.

15 3. Risks Related to Class Certification

16 84. Lead Plaintiff and Lead Counsel believe that the Court would have granted Lead
17 Plaintiff’s pending motion and certified the class in this Action. However, at the time that the
18 Parties reached their agreement in principle to settle, that motion was still pending. Thus, there
19 was some risk that the Court might adopt Defendants’ view and decline to certify the class, which
20 would have precluded any recovery for the class, or might have certified a class for only a shorter
21 period.

22 85. In particular, Defendants argued at the class certification stage that they could
23 rebut the fraud-on-the-market presumption of reliance. They argued that the alleged
24 misstatements had no impact on iRhythm’s stock price because iRhythm’s stock did not increase
25 in a statistically significant manner, and because the corrective disclosures did not match the
26 alleged misrepresentations under *Goldman Sachs Group, Inc. v. Arkansas Teacher Retirement*
27 *System*, 594 U.S. 113 (2021). Defendants also relied on the Second Circuit’s decision in *Arkansas*
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1 *Teacher Retirement System v. Goldman Sachs Group, Inc.*, 77 F.4th 74 (2d Cir. 2023) (“*Goldman*
2 *II*”), arguing that the generic nature of the challenged statements made it less likely to have
3 impacted the stock price, and on their medical expert’s testimony that physicians understood the
4 limitations of the Zio AT. Thus, Defendants argued, the alleged misstatements did not impact the
5 stock price and individual issues of reliance would predominate over common questions,
6 rendering class certification inappropriate. While Lead Plaintiff believes that its expert’s event
7 study demonstrated statistically significant price reactions to the corrective disclosures, and that
8 the Court’s prior rulings sustaining the falsity of Defendants’ statements undermined the *Goldman*
9 challenge, Defendants’ arguments nevertheless posed a risk to certifying the class.

10 86. Even if the Court had certified the class, Lead Plaintiff also faced the risk of a
11 shortened class period or reduced compensable damages. Defendants’ opposition to class
12 certification argued that the transmission limit was fully disclosed no later than November 1,
13 2022. Thus, Defendants argued, any alleged concealment could not have impacted iRhythm’s
14 stock price beyond November 2, 2022, and the four alleged corrective disclosures after that date
15 independently failed to establish price impact because they did not reveal new information to the
16 market. Had Defendants persuaded the Court that price impact could only be inferred through
17 November 2, 2022, damages attributable to later corrective disclosures would have been
18 eliminated. In addition, Defendants argued the class period cannot begin before August 5, 2022—
19 the date of the first surviving alleged misstatement—rather than the July 25, 2022 start date
20 proposed by Lead Plaintiff.

21 87. An additional risk to class certification included Defendants’ argument that Lead
22 Plaintiff failed to propose a methodology capable of calculating damages on a class-wide basis
23 consistent with its theory of liability. Defendants challenged Lead Plaintiff’s expert’s proposed
24 “out-of-pocket” damages methodology on the grounds that it failed to account for time-varying
25 inflation over the class period, could not isolate the impact of confounding (non-fraud-related)
26 information on corrective disclosure dates, and did not address the economic gaps between the
27 alleged misstatements and the corrective disclosures. Lead Plaintiff believed its counterargument
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1 was strong—that the out-of-pocket damages methodology is used in virtually every securities
2 class action and easily satisfies Rule 23 and the Supreme Court’s ruling in *Comcast Corporation*
3 *v. Behrend*, 569 U.S. 27 (2013). Nevertheless, Defendants’ argument posed a tangible risk to class
4 certification.

5 **C. The Settlement Amount Compared to Likely Maximum Damages**
6 **That Could Be Proved At Trial**

7 88. The Settlement Amount—\$45 million in cash, plus interest—represents a
8 significant recovery for the Settlement Class. The Settlement is over four times the size of the
9 median securities class-action settlement in the Ninth Circuit from 2016 through 2025 (\$11
10 million). *See* CORNERSTONE RESEARCH, SECURITIES CLASS ACTION SETTLEMENTS: 2025 REVIEW
11 AND ANALYSIS (2026), attached hereto as Exhibit 2, at 19.

12 89. The \$45 million Settlement is also a favorable result considered in relation to the
13 maximum amount of damages that could be realistically established at trial—even assuming that
14 Lead Plaintiff and the Settlement Class prevailed on all liability issues, including falsity and
15 scienter, which was far from certain.

16 90. Lead Plaintiff’s damages expert, Dr. Matthew Cain, has calculated that the
17 absolute maximum damages amount that could be obtained at trial on the remaining claims in the
18 Action would be approximately \$698 million. That number assumes that Lead Plaintiff prevailed
19 on all liability issues and obtained the maximum possible stock price declines on all corrective
20 disclosure dates. *See* Declaration of Matthew Cain (Dkt. No. 147-3), at ¶ 18.

21 91. However, there were very credible risks that the maximum obtainable damages
22 could be considerably reduced. For example, the maximum possible damages estimate above
23 incorporates multi-day stock price declines after several corrective disclosures. If Defendants
24 prevailed on their argument that only the stock price decline on the first trading day following
25 each alleged corrective disclosure could be attributed to the disclosure (as opposed to multi-day
26 windows of stock price declines), maximum damages would be reduced to approximately \$591
27 million. *Id.* ¶ 20. As noted above, if the Court or a jury concluded, as Defendants have repeatedly
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1 argued, that the May 30, 2023 Warning Letter fully disclosed the fraud concerning the Zio AT’s
2 transmission limit, maximum damages would fall to \$526 million. *Id.* ¶ 21. If Lead Plaintiff were
3 unable to establish liability as to the statements concerning the accuracy of the Zio AT—whether
4 because those statements were too generic and/or aspirational to have impacted the price of
5 iRhythm’s stock, or were not made with scienter—maximum damages would be reduced to
6 approximately \$428 million. *Id.* ¶ 22.

7 92. Moreover, if the Court accepted Defendants’ argument that the alleged
8 misrepresentations were fully corrected by the alleged November 1, 2022 corrective disclosure,
9 damages would have been further reduced to only approximately \$51.5 million. *Id.* ¶ 23. If the
10 Court determined that the alleged misrepresentations were fully corrected by the alleged
11 November 1, 2022, corrective disclosure and only the stock price declines on November 2, 2022
12 and November 3, 2022 were considered (but not the November 4, 2022 decline), damages would
13 have been reduced to approximately \$34.3 million. *Id.*

14 93. Thus, the \$45,000,000 Settlement Amount represents approximately 6.4% to
15 10.5% of what Lead Plaintiff considers realistic maximum class-wide damages (ranging from
16 \$428 million to an absolute maximum of \$698 million). Assuming the scenario that Defendants
17 argue is the most realistic—that there were no recoverable damages attributable to any corrective
18 disclosure after November 1, 2022, the settlement represents 131.2% of maximum class-wide
19 damages of \$34.3 million. *Id.* This represents a very favorable recovery for Settlement Class
20 Members, especially when considered in light of the real risks of no-or-lesser recovery and the
21 typical level of recovery in securities class actions. *See, e.g., Vataj v. Johnson*, 2021 WL 1550478,
22 at *9 (N.D. Cal. Apr. 20, 2021) (settlement amounting to 2% of damages was “consistent with the
23 typical recovery in securities class action settlements”); *In re Extreme Networks, Inc. Sec. Litig.*,
24 2019 WL 3290770, at *9 (N.D. Cal. July 22, 2019) (approving gross settlement amount equal to
25 between “5% and 9.5% of non-disaggregated damages”); *In re Omnivision Techs., Inc.*, 559 F.
26 Supp. 2d 1036, 1042 (N.D. Cal. 2008) (settlement equal to 6% to 9% of damages “higher than
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1 the median percentage of investor losses recovered in recent shareholder class action
2 settlements”).

3 94. Given the meaningful litigation risks, and the immediacy and amount of the
4 \$45,000,000 recovery for the Settlement Class, Lead Plaintiff and Lead Counsel believe that the
5 Settlement is fair, reasonable, and adequate, and is in the best interest of the Settlement Class.

6 **III. LEAD PLAINTIFF’S COMPLIANCE WITH THE COURT’S**
7 **PRELIMINARY APPROVAL ORDER REQUIRING ISSUANCE OF**
8 **NOTICE**

9 95. The Court’s Preliminary Approval Order directed that the Notice of (I) Pendency
10 of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys’
11 Fees and Litigation Expenses (the “Notice”) and Proof of Claim and Release Form (“Claim
12 Form”) be disseminated to potential members of the Settlement Class. The Preliminary Approval
13 Order also set October 1, 2026 as the deadline for Settlement Class Members to submit Claim
14 Forms, submit objections to the Settlement, the Plan of Allocation, or the Fee and Expense
15 Application, or to request exclusion from the Settlement Class.

16 96. In accordance with the Preliminary Approval Order, Lead Counsel instructed
17 Strategic Claims Services (“SCS”), the Court-approved Claims Administrator, to begin
18 disseminating copies of the Notice and the Claim Form and to publish the Summary Notice. The
19 Notice contains, among other things, a description of the Action, the Settlement, the proposed
20 Plan of Allocation, and Settlement Class Members’ rights to participate in the Settlement, object
21 to the Settlement, the Plan of Allocation and/or the Fee and Expense Application, or exclude
22 themselves from the Settlement Class. The Notice also informs Settlement Class Members of
23 Lead Counsel’s intent to apply for an award of attorneys’ fees in an amount not to exceed 25% of
24 the Settlement Fund, and for Litigation Expenses in an amount not to exceed \$800,000.

25 97. To disseminate the Notice and Claim Form (together, the “Notice Packet”), SCS
26 obtained information from iRhythm and from banks, brokers, and other nominees regarding the
27 names and addresses of potential Settlement Class Members. The accompanying Declaration of
28 Sarah Evans of SCS (“Evans Decl.”), attached hereto as Exhibit 3, provides additional

1 information about the Claims Administrator's distribution of the Notice Packet. *See* Evans Decl.
2 ¶¶ 2-11. Attorneys at BLB&G have had regular calls and communications with SCS to oversee
3 the process of disseminating notice to Settlement Class Members.

4 98. SCS began mailing copies of the Notice Packet to potential Settlement Class
5 Members and nominee owners on July 28, 2026. *Id.* ¶¶ 5-7. As of August 20, 2026, SCS had
6 disseminated a total of 83,002 Notice Packets to Settlement Class Members and nominees. *Id.*
7 ¶ 11. SCS sent the Notice Packet by postal mail to all potential Settlement Class Members for
8 whom it received postal addresses and by email to all potential Settlement Class Members for
9 whom it received email addresses, and sent the Notice Packet by both means to those investors
10 for whom it received both types of addresses. *Id.* ¶¶ 5, 8, 10.

11 99. On August 6, 2026, in accordance with the Preliminary Approval Order, SCS
12 caused the Summary Notice to be published in *The Wall Street Journal* and to be transmitted over
13 the PR Newswire. *Id.* ¶ 12.

14 100. Lead Counsel also caused SCS to establish a dedicated settlement website,
15 www.iRhythmSecuritiesLitigation.com, to provide potential Settlement Class Members with
16 information concerning the Settlement and access to copies of the Notice and Claim Form, as well
17 as copies of the Complaint, Stipulation, Preliminary Approval Order, and other relevant
18 documents. *See* Evans Decl. ¶ 14. That website became operational on July 28, 2026. *Id.* Lead
19 Counsel also made copies of the Notice and Claim Form and other documents available on its
20 own website, www.blbglaw.com. Lead Counsel and SCS have regularly monitored the settlement
21 website to ensure that it is operating correctly. Lead Counsel and SCS will continue to monitor
22 and to update the settlement website as the settlement process continues. For example, Lead
23 Counsel's papers in support of its motion for attorneys' fees and litigation expenses and Lead
24 Plaintiff's papers in support of its motion for final approval of the Settlement will be made
25 available on the website after they are filed, and any orders entered by the Court in connection
26 with the motions will also be posted.

101. As noted above, the deadline for Settlement Class Members to file objections to the Settlement, Plan of Allocation, or Fee and Expense Application, or to request exclusion from the Settlement Class is October 1, 2026. To date, no requests for exclusion have been received, *see* Evans Decl. ¶ 15, and no objections to the Settlement, Plan of Allocation, or Lead Counsel’s Fee and Expense Application have been received. On October 22, 2026, Lead Plaintiff will file its motion for final approval of the Settlement and Plan of Allocation that will address any requests for exclusion or objections to the Settlement or Plan of Allocation that may be received. In addition, if needed, Lead Counsel will file reply papers addressing any objections to the motion for fees and expenses.

IV. THE FEE AND EXPENSE APPLICATION

102. Lead Counsel is applying to the Court for an award of attorneys’ fees of 25% of the Settlement Fund, including interest earned thereon (the “Fee Application”). Lead Counsel also requests payment for expenses that it incurred in connection with the prosecution of the Action from the Settlement Fund in the amount of \$672,934.95, and reimbursement of \$9,600.00 incurred by Lead Plaintiff as permitted under the PSLRA.

103. The legal authorities supporting the requested fee and expenses are discussed in Lead Counsel’s Fee and Expense Motion. As discussed in the motion, the 25% fee award requested is consistent with the benchmark for percentage fee awards in the Ninth Circuit, is well within the range of percentage fees typically awarded in comparable securities class actions in this Circuit and elsewhere, and is fair and reasonable in light of all the circumstances in this case.

A. The Fee Application

104. For its efforts on behalf of the Settlement Class, Lead Counsel is applying for a fee award to be paid from the Settlement Fund on a percentage basis. As discussed in the accompanying Fee Motion, the percentage method is the standard and appropriate method of fee recovery because it aligns the lawyers’ interest in being paid a fair fee with the interests of the Settlement Class in achieving the maximum recovery in the shortest amount of time required under the circumstances. Use of the percentage method has been recognized as appropriate by the

1 Supreme Court and Ninth Circuit for cases of this nature where an all-cash common fund has
2 been recovered for a class.

3 **1. Lead Plaintiff Has Authorized and Supports the Fee Application**

4 105. Lead Plaintiff is a sophisticated institutional investor that closely supervised and
5 monitored the prosecution and settlement of this Action. *See* Declaration of Chase Rankin,
6 Executive Director of Oklahoma Firefighters Pension and Retirement System (“Rankin Decl.”),
7 attached hereto as Exhibit 1, at ¶¶ 3-6. Lead Plaintiff has evaluated the Fee Application and fully
8 supports the fee requested. *See id.* ¶ 8. Lead Plaintiff believes that the proposed fee of 25% is fair
9 and reasonable in light of the result obtained for the Settlement Class, the amount and quality of
10 the work performed by Lead Counsel, and the significant litigation risk counsel faced. *Id.*

11 **1. The Work Performed by Lead Counsel**

12 106. Lead Counsel devoted substantial time to the prosecution of the Action. The work
13 that Lead Counsel performed in this Action included, among other things: (1) conducting an
14 extensive investigation into the claims asserted, which included a detailed review of public
15 documents, interviews with dozens of former iRhythm employees, and consultation with experts;
16 (2) drafting the detailed Amended Complaint and Complaint; (3) researching, briefing, and
17 arguing Lead Plaintiff’s opposition to Defendants’ motion to dismiss; (4) researching and briefing
18 Lead Plaintiff’s opposition to Defendants’ motion for judgment on the pleadings; (5) fully briefing
19 and arguing Lead Plaintiff’s motion for class certification; (6) conducting substantial fact
20 discovery, including exchanging initial disclosures, propounding thorough document requests,
21 issuing subpoenas to eight non-parties, reviewing over 400,000 pages produced by Defendants
22 and non-parties, and taking or defending seven depositions; (7) working with expert financial
23 economists and medical expert consultants; and (8) engaging in extensive arm’s-length settlement
24 negotiations to achieve the Settlement, including detailed mediation briefing, and a formal
25 mediation session.

26 107. Attached hereto as Exhibit 4 is a summary of the amount of time spent by each
27 attorney and other professional support staff employee at BLB&G who devoted ten (10) or more
28

1 hours to the Action from its inception through and including July 31, 2026, and the lodestar
2 calculation for those individuals based on their current hourly rates. For personnel who are no
3 longer employed by my firm, the lodestar calculation is based upon the hourly rates for such
4 personnel in their final year of employment with the firm. The schedule was prepared from
5 contemporaneous daily time records regularly prepared and maintained by BLB&G.

6 108. In addition, consistent with the Northern District of California's Procedural
7 Guidance for Class Action Settlements, Exhibit 5 hereto shows the hours worked by each of Lead
8 Counsel's professionals who worked on the matter, broken down by 16 different substantive
9 categories of work. Further, as requested by the Court in its Preliminary Approval Order, Exhibit
10 6 contains the detailed daily time records of Lead Counsel's work in this Action.²

11 109. All time expended in preparing this application for fees and expenses has been
12 excluded from Exhibits 4, 5, and 6. Other substantial reductions have been made in the interest of
13 billing judgment. Lead Counsel also notes that there will not be any additional fees charged for
14 any work by counsel following this application, notwithstanding that counsel already has and will
15 continue to invest substantial time and effort in this case after the July 31, 2026 cut-off imposed
16 for its lodestar submission in this application.

17 110. As set forth in Exhibit 4, Lead Counsel expended a total of 8,745 hours in the
18 investigation and prosecution of the Action from its inception through July 31, 2026, for a lodestar
19 of \$6,243,750.00. The requested fee of 25% of the Settlement Fund represents \$11,250,000 (plus
20 interest accrued at the same rate as the Settlement Fund), and therefore represents a multiplier of
21 approximately 1.8 of Lead Counsel's lodestar. As discussed in further detail in the Fee Motion,
22 the requested multiplier cross-check is well within the range of multipliers typically seen in
23 comparable securities class actions and in other class actions involving significant contingency
24 fee risk, in this Circuit and elsewhere.

25
26 ² Lead Counsel's contemporaneous daily time records have been edited for clarity and the
27 Narrative section of certain entries has been revised to avoid disclosure of confidential work-
28 product or other confidential information.

111. As noted above, Exhibit 5 contains a chart summarizing the work performed by Lead Counsel's professionals, broken by 16 different major litigation tasks. The categories used are set forth here:

- (1) **Investigation and Pre-Filing Case Analysis (717.25 hours):** includes time spent on analysis of potential claims to assert in the Action; initial case development; analysis of clients' and class losses; and the thorough investigation into the claims asserted in the Action, including reviewing the voluminous public record and identifying, contacting, and interviewing potential witnesses;
- (2) **Initial Complaint (69 hours):** includes time spent on research, preparation, and filing of the initial complaint filed in the Action, including associated legal and factual research;
- (3) **Lead Plaintiff Motion (51 hours):** includes time spent researching and drafting the motion papers for appointment of Oklahoma Firefighters as Lead Plaintiff and BLB&G as Lead Counsel;
- (4) **Complaints (537.5 hours):** includes time incurred in researching and preparing the July 19, 2024 Amended Class Action Complaint and the October 11, 2024 Second Amended Class Action Complaint (the "Complaint"), including associated legal and factual research;
- (5) **Motion to Dismiss Opposition (525 hours):** includes time incurred in researching and drafting Lead Plaintiff's opposition to Defendants' motion to dismiss the Complaint, as well as related briefing on Defendants' request for judicial notice, and preparing for and participating in oral argument on the motion;
- (6) **Motion for Judgment on the Pleadings Opposition (236.25 hours):** includes time incurred in researching and drafting Lead Plaintiff's opposition to Defendants' motion for judgment on the pleadings as well as responding to Defendants' related request for judicial notice;

- 1 (7) **Motion for Class Certification (667.25 hours):** includes time spent on Lead
2 Plaintiff’s motion for class certification, including related legal research and
3 briefing, and preparing for and participating in argument on the motion (but does
4 not include expert work in support of class certification, which is included under
5 “Expert Work” below);
- 6 (8) **Discovery – Discovery Communications, Disputes & General (421.75 hours):**
7 includes time spent on general discovery strategy; discovery correspondence; meet
8 and confers with Defendants’ Counsel; preparing Lead Plaintiff’s Initial
9 Disclosure Statement under Rule 26(a); drafting and negotiating the proposed
10 protective order; and discovery disputes (including the dispute about application
11 of PSLRA stay to the motion for judgment on the pleadings), including
12 communications re same and research and briefing;
- 13 (9) **Discovery – Written/Document Discovery (2,947.5 hours):** includes time
14 incurred in drafting requests for production of documents, interrogatories, and
15 subpoenas; preparing responses and objections to requests for production of
16 documents, interrogatories, and requests for admission served on Lead Plaintiff;
17 reviewing client documents for production; reviewing and analyzing documents
18 produced by Defendants and third parties; reviewing and producing privilege logs;
19 and work related to the electronic document database;
- 20 (10) **Discovery – Depositions (1,468.25 hours):** includes time incurred by Lead
21 Counsel in preparing a deposition plan; and taking and preparing to take and
22 defend non-expert depositions, including document review specifically for
23 purposes of deposition preparation;
- 24 (11) **Expert Work (217 hours):** includes the time spent working with experts and
25 consultants; working on preparing the expert report for class cert. motion; and
26 engaging in expert discovery, including defending and taking expert depositions
27 and preparing to do so;
- 28

(12) **Mediation & Settlement (433 hours):** includes time incurred in extended settlement negotiations with Defendants; preparing for and attending the mediation session; drafting the mediation statement; drafting and negotiating the Stipulation of Settlement and related documents; and drafting Lead Plaintiff's motion for preliminary approval of the Settlement (but does not include any work related to Lead Counsel's motion for fees and expenses);

(13) **Case Management (259.25 hours):** includes time incurred in preparing status reports and case management statements to the Court, *pro hac vice* motions, negotiating and preparing stipulations and proposed scheduling orders, and other procedural and administrative tasks not connected to one of the other substantive tasks;

(14) **Case Strategy & Analysis (43.5 hours):** includes time devoted to overall case strategy and analysis, including litigation strategy and damages issues;

(15) **Docket/News Monitoring (11.75 hours):** includes time incurred in reviewing docket updates on case or related cases and monitoring of news on company or industry; and

(16) **Client Communications (139.75 hours):** includes time incurred in communications with Lead Plaintiff, including preparing status reports and memoranda and in conference calls.

2. The Experience and Standing of Lead Counsel

112. The skill and expertise of Lead Counsel also support the requested fee. As demonstrated by its resume, attached as Exhibit 7, BLB&G is among the most experienced and skilled law firms in the securities litigation field, with a long and successful track record representing investors in such cases, and it is consistently ranked among the top plaintiffs' firms in the country.

113. BLB&G served as Lead Counsel in *In re WorldCom, Inc. Securities Litigation*, No. 1:02-cv-03288 (S.D.N.Y.), in which settlements were obtained for the class totaling in excess

1 of \$6 billion. BLB&G also secured a resolution of \$2.43 billion for the class in *In re Bank of*
2 *America Corp. Securities, Derivative & “ERISA” Litigation*, No. 1:09-md-02058 (S.D.N.Y.); a
3 \$1.06 billion recovery for the class in *In re Merck & Co., Inc. Securities, Derivative & “ERISA”*
4 *Litigation*, No. 2:05-cv-01151 (D.N.J.); a \$1 billion recovery for the class in *In re Wells Fargo &*
5 *Co. Securities Litigation*, No. 1:20-cv-04494-GHW-SN (S.D.N.Y.); and a \$730 million settlement
6 on behalf of the class in *In re Citigroup Inc. Bond Action Litigation*, No. 1:08-cv-09522
7 (S.D.N.Y.).

8 114. Courts in this District and Circuit have recognized BLB&G as qualified class
9 counsel in securities class actions. Such examples include *In re McKesson HBOC, Inc. Securities*
10 *Litigation*, No. 5:99-cv-20743 (N.D. Cal.), in which BLB&G recovered \$1.05 billion for
11 investors, the largest recovery in a securities class action in the Ninth Circuit; *Hefler v. Wells*
12 *Fargo & Company*, No. 4:16-cv-05479 (N.D. Cal.), in which BLB&G recovered \$480 million for
13 investors; *In re Allergan, Inc. Proxy Violation Securities Litigation*, No. 8:14-cv-02004 (C.D.
14 Cal.), in which BLB&G recovered \$250 million for investors; and *In re New Century Securities*
15 *Litigation*, No. 2:07-cv-00931 (C.D. Cal.), in which BLB&G secured an approximately \$125
16 million recovery for investors.

17 3. Standing and Caliber of Defendants’ Counsel

18 115. The quality of the work performed by Lead Counsel in attaining the Settlement
19 should also be evaluated in light of the quality of the opposition. Defendants were represented in
20 the Action by a team of extremely able counsel from Quinn Emanuel Urquhart & Sullivan, LLP,
21 who vigorously litigated the Action. In the face of this skillful and zealous opposition, Lead
22 Counsel was nonetheless able to develop a case that was sufficiently strong to persuade
23 Defendants and their counsel to settle the case on terms that are highly favorable to the Settlement
24 Class.

1 **4. The Risks of Litigation and the Need to Ensure the Availability**
2 **of Competent Counsel in High-Risk Contingent Cases**

3 116. The prosecution of these claims was undertaken entirely on a contingent-fee basis,
4 and the considerable risks assumed by Lead Counsel in bringing this Action to a successful
5 conclusion are described above. The risks assumed by Lead Counsel here, and the time and
6 expenses incurred by Lead Counsel without any payment, were extensive.

7 117. From the outset, Lead Counsel understood that it was embarking on a complex,
8 expensive, lengthy, and hard-fought litigation with no guarantee of ever being compensated for
9 the substantial investment of time and the outlay of money that the prosecution of the case would
10 require. In undertaking that responsibility, Lead Counsel was obligated to ensure that sufficient
11 resources (in terms of attorney and support staff time) were dedicated to the litigation, and that
12 Lead Counsel would further advance all of the costs necessary to pursue the case vigorously on a
13 fully contingent basis, including funds to compensate vendors and consultants and to cover the
14 considerable out-of-pocket costs that a case such as this typically demands. Because complex
15 shareholder litigation often proceeds for several years before reaching a conclusion, the financial
16 burden on contingent-fee counsel is far greater than on a firm that is paid on an ongoing basis.
17 Indeed, Lead Counsel has received no compensation during the course of this Action and no
18 reimbursement of any out-of-pocket expenses.

19 118. Lead Counsel also bore the risk that no recovery would be achieved in the Action.
20 As discussed above, this case presented a number of significant trial risks and uncertainties from
21 the outset, including challenges in proving the materiality and falsity of Defendants' statements,
22 establishing scienter, and establishing loss causation and damages. These risks were elevated in
23 this case. Defendants vigorously denied making any false statements and denied that the price
24 declines at issue were caused by revelation of the truth related to the challenged statements.
25 Moreover, iRhythm never restated any of its financial statements and there was no parallel SEC
26 enforcement action concerning alleged misrepresentations.
27
28

1 119. The Settlement was reached only after Lead Counsel had conducted a substantial
2 investigation, overcome Defendants' motion to dismiss and motion for judgment on the pleadings,
3 moved for class certification, conducted substantial fact discovery, and engaged in arm's-length
4 settlement negotiations. Lead Counsel's persistent efforts in the face of significant risks and
5 uncertainties have resulted in a significant and certain recovery for the Settlement Class.

6 **5. The Reaction of the Settlement Class to the Fee Application**

7 120. As noted above, as of August 20, 2026, over 83,000 Notice Packets had been sent
8 to potential Settlement Class Members and nominees advising them that Lead Counsel would
9 apply for attorneys' fees in an amount not to exceed 25% of the Settlement Fund. *See* Evans Decl.
10 ¶ 11 and Ex. A (Notice ¶¶ 5, 51). In addition, the Court-approved Summary Notice was published
11 in *The Wall Street Journal* and transmitted over the *PR Newswire* on August 6, 2026. *See* Evans
12 Decl. ¶ 12. To date, no objections to the request for attorneys' fees have been received.

13 **B. The Expense Application**

14 121. Lead Counsel also seeks payment from the Settlement Fund of \$672,934.95 in
15 litigation expenses that Lead Counsel reasonably incurred in connection with commencing,
16 litigating and settling the claims asserted in the Action.

17 122. From the outset of the Action, Lead Counsel has been aware that it might not
18 recover any of the expenses incurred, and, further, if there were to be reimbursement of expenses,
19 it would not occur until the Action was successfully resolved, often a period lasting several years.
20 Lead Counsel also understood that, even assuming that the case was ultimately successful,
21 reimbursement of expenses would not necessarily compensate them for the lost use of funds
22 advanced by them to prosecute the Action. Consequently, Lead Counsel was motivated to, and
23 did, take significant steps to minimize expenses whenever practicable without jeopardizing the
24 vigorous and efficient prosecution of the case.

25 123. As set forth in Exhibit 8 hereto, Lead Counsel has paid or incurred a total of
26 \$672,934.95 in litigation expenses in connection with the prosecution of the Action. These
27
28

1 expense items are billed separately by Lead Counsel, and such charges are not duplicated in Lead
2 Counsel's hourly rates.

3 124. Lead Counsel's expenses are summarized in Exhibit 8 hereto, which identifies
4 each category of expense and the amount incurred for each category. A detailed list of all of Lead
5 Counsel's expenses is attached as Exhibit 9.

6 125. Of the total amount of expenses, \$450,926.25, or approximately 67%, was
7 expended for the retention of experts. As discussed above, Lead Counsel consulted with Matthew
8 D. Cain, a well-qualified expert in market efficiency, loss causation, and damages, and his team
9 at Fideres USA, Inc., during its investigation and the preparation of the Complaint, during the
10 settlement negotiations with Defendants, and in connection with the preparation of the Plan of
11 Allocation. Lead Counsel also consulted with financial economists at Forensic Economics in the
12 early stages of the litigation, and worked with two expert consultants concerning FDA regulation
13 of medical devices.

14 126. Another large component of the litigation expenses was for legal and factual
15 research, which was necessary to prepare the complaints, research the law pertaining to the claims
16 asserted in the Action, oppose Defendants' motion to dismiss and motion for judgment on the
17 pleadings, litigate certain discovery disputes, and prepare Lead Plaintiff's motion for class
18 certification. The charges for such research amounted to \$76,543.15 or 11% of the total amount
19 of expenses. The factual research costs included costs paid to the FDA for its search time and
20 duplication costs in connection with Lead Counsel's FOIA requests, and for access to articles in
21 medical research journals, as well as costs incurred for on-line databases and information services
22 such as AlphaSense, Refinitiv, Bureau of National Affairs, Court Alert, and PACER. The legal
23 research costs included out-of-pocket payments to vendors such as Westlaw and LexisNexis.
24 These resources were used to obtain factual information regarding the claims asserted, obtain
25 access to court filings, and conduct legal research and cite-checking of briefs. These expenses
26 represent the actual expenses incurred by BLB&G for use of these services in connection with
27 this litigation. There are no administrative charges included in these figures. Online research is
28

1 billed to each case based on actual usage at a charge set by the vendor. When BLB&G utilizes
2 online services provided by a vendor with a flat-rate contract, access to the service is by a billing
3 code entered for the specific case being litigated. At the end of each billing period, BLB&G's
4 costs for such services are allocated to specific cases based on the percentage of use in connection
5 with that specific case in the billing period.

6 127. Lead Plaintiff's share of the mediation costs paid to Phillips ADR for the services
7 of Mr. Murphy totaled \$55,950.00 or 8% of Lead Counsel's Litigation Expenses. As noted above,
8 the Parties retained Mr. Murphy, an experienced mediator of securities class actions and other
9 complex litigation, to assist with settlement negotiations in the Action, including a formal
10 mediation session on April 2, 2026. The mediation expenses were divided evenly between Lead
11 Plaintiff and Defendants.

12 128. The other expenses for which Lead Counsel seeks payment are the types of
13 expenses that are necessarily incurred in litigation and routinely charged to clients billed by the
14 hour. These expenses include, among others, court fees, court reporting, express mail, and travel.
15 All of the litigation expenses incurred by Lead Counsel were reasonable and necessary to the
16 successful litigation of the Action, and have been approved by Lead Plaintiff. *See Rankin Decl.*

17 ¶ 9. The following is additional information regarding certain of these expenses:

18 (a) **Document Hosting & Management** (\$6,098.52). BLB&G seeks
19 \$6,098.52 for document hosting and management costs, which represents BLB&G's costs
20 associated with establishing and maintaining the internal document database that BLB&G
21 employed to process and review the documents produced to Lead Plaintiff by Defendants.
22 BLB&G charges a rate of \$4 per gigabyte of data per month and \$17 per user to recover
23 the costs associated with maintaining its document database management system, which
24 includes the costs to BLB&G of necessary software licenses and hardware. BLB&G has
25 conducted a review of market rates charged for the similar services performed by third-
26 party document management vendors and found that its rate was at least 80% below the
27 market rates charged by these vendors, resulting in a savings to the class.
28

(b) **Independent Counsel for Witnesses** (\$17,051.25). Lead Counsel incurred \$17,051.25 in attorneys' fees for the retention of independent counsel, Slarskey LLC, to represent former iRhythm employees that Lead Counsel contacted during their investigation and who wished to be represented by independent counsel. Similar expenses have routinely been approved by courts. *See, e.g., In re Qualcomm Inc. Sec. Litig.*, Case No. 3:17-cv-00121-JO-MS, slip op. at 1-2 (S.D. Cal. Sept. 27, 2024), Dkt. No. 450 (awarding expenses reimbursing class counsel for the costs of paying for independent counsel for third-party witnesses); *SEB Inv. Mgmt. AB v. Symantec Corp.*, No. C 18-02902-WHA, slip op. at 15 (N.D. Cal. Feb. 10, 2022) (same); *In re Impinj, Inc. Sec. Litig.*, No. 3:18-cv-05704-RSL, slip op. at 1 (W.D. Wash. Nov. 20, 2020), Dkt. No. 106 (same).

(c) **Out-of-Town Travel** (\$14,380.15). BLB&G seeks reimbursement of \$14,380.15 in costs incurred in connection with travel in connection with the Action, which includes travel for BLB&G attorneys to attend Court hearings and depositions, and for Mr. Rankin of Oklahoma Firefighters for travel to the Court's hearing on the motion to dismiss, his depositions, and the mediation session. Airfare is capped at coach rates, hotel charges are capped at \$350 per night, and travel meals are capped at \$20 per person for breakfast, \$25 per person for lunch, and \$50 per person for dinner.

(d) **Working Meals** (\$3,701.96). Out-of-office working meals are capped at \$25 per person for lunch and \$50 per person for dinner; and in-office working meals are capped at \$25 per person for lunch and \$40 per person for dinner.

129. In addition, Lead Plaintiff seeks reimbursement of \$9,600.00 in reasonable costs that Oklahoma Firefighters incurred directly in connection with its representation of the Settlement Class. Such payments are expressly authorized and anticipated by the PSLRA, as more fully discussed in the Fee and Expense Motion at 20-21.³ The amount of time and effort devoted

³ The PSLRA specifically provides that an "award of reasonable costs and expenses (including lost wages) directly relating to the representation of the class" may be made to "any representative party serving on behalf of a class." 15 U.S.C. § 78u-4(a)(4).

1 to this Action by Oklahoma Firefighters' Executive Director, Chase Rankin, is detailed in his
2 declaration, attached as Exhibit 1. As discussed therein, Lead Plaintiff has been fully committed
3 to pursuing the Settlement Class's claims since it became involved in the Action. Lead Plaintiff's
4 efforts during the course of the Action included regular communications with Lead Counsel
5 concerning significant developments in the litigation and case strategy, reviewing and
6 commenting on significant pleadings and briefs filed in the Action, reviewing and commenting
7 on the discovery requests served on Lead Plaintiff in this Action, assisting in searching for and
8 producing documents and electronically stored information in response to Defendants' document
9 requests, sitting for a deposition, attending the mediation session, and participating in the
10 settlement negotiations. *See* Rankin Decl. ¶¶ 5-6. These are precisely the types of activities courts
11 have found to support reimbursement of class representatives, and fully support Lead Plaintiff's
12 request for reimbursement here. Lead Plaintiff seeks reimbursement of \$9,600.00 for a total of 80
13 hours expended in connection with the Action by Mr. Rankin. *Id.* ¶ 12.

14 130. The Notice informed the Settlement Class that Lead Counsel would apply for
15 Litigation Expenses in an amount not to exceed \$800,000, which amount might include a request
16 for reimbursement of the reasonable costs incurred by Lead Plaintiff directly related to their
17 representation of the Settlement Class (in an amount not to exceed \$10,000). The amount of
18 Litigation Expenses requested, \$682,534.95, including \$672,934.95 in Lead Counsel's litigation
19 expenses and \$9,600.00 requested by Lead Plaintiff, is well below the expense amount set forth
20 in the notices. To date, there have been no objections to the maximum amount of Litigation
21 Expenses set forth in the notices.

22 131. Attached in Exhibit 10 is a compendium of true and correct copies of the
23 unpublished opinions and authority cited in the Fee and Expense Motion.

24 **V. CONCLUSION**

25 For all the reasons set forth above, Lead Counsel respectfully submits that the requested
26 fee in the amount of 25% of the Settlement Fund should be approved as fair and reasonable, and
27
28

1 the request for Lead Counsel's Litigation Expenses in the amount of \$672,934.95, and Lead
2 Plaintiff's costs in the amount of \$9,600.00 should also be approved.

3 I declare, under penalty of perjury, that the foregoing is true and correct. Executed on
4 August 20, 2026.

5 /s/ Katherine M. Sinderson
6 Katherine M. Sinderson
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Exhibit 1

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

JONATHAN D. USLANER (Bar No. 256898)
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2121 Avenue of the Stars, Suite 2575
Los Angeles, CA 90067
Tel: (310) 819-3481

*Counsel for Lead Plaintiff Oklahoma
Firefighters Pension and Retirement System
and Lead Counsel for the Settlement Class*

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

GLAZING EMPLOYERS AND GLAZIERS'
UNION LOCAL #27 PENSION AND
RETIREMENT FUND, on behalf of itself and
all others similarly situated,

Plaintiff,

v.

IRHYTHM TECHNOLOGIES, INC., et al.,

Defendants.

Case No. 3:24-cv-706-JSC

**DECLARATION OF CHASE RANKIN,
EXECUTIVE DIRECTOR OF
OKLAHOMA FIREFIGHTERS
PENSION AND RETIREMENT
SYSTEM, IN SUPPORT OF (I) LEAD
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF SETTLEMENT AND
PLAN OF ALLOCATION; AND
(II) LEAD COUNSEL'S MOTION FOR
ATTORNEYS' FEES AND
LITIGATION EXPENSES**

CLASS ACTION

Date: November 5, 2026

Time: 10:00 a.m.

Judge: Hon. Jacqueline Scott Corley

1 I, CHASE RANKIN, declare as follows:

2 1. I am the Executive Director of the Oklahoma Firefighters Pension and Retirement
3 System (“Oklahoma Firefighters” or “Lead Plaintiff”). I submit this Declaration in support of
4 (a) Lead Plaintiff’s motion for final approval of the proposed Settlement and Plan of Allocation,
5 and (b) Lead Counsel’s motion for attorneys’ fees and Litigation Expenses, including an application
6 pursuant to 15 U.S.C. § 78u-4(a)(4) for reimbursement of Oklahoma Firefighters’ reasonable costs
7 incurred as a result of the work performed by its personnel in connection with Oklahoma
8 Firefighters’ representation of the Settlement Class in this Action.¹

9 2. I am aware of and understand the requirements and responsibilities of a representative
10 plaintiff in a securities class action, including those set forth in the Private Securities Litigation
11 Reform Act of 1995 (“PSLRA”). I have knowledge of the matters set forth in this Declaration based
12 on my personal knowledge and discussions with other Oklahoma Firefighters’ employees who have
13 been involved in monitoring and overseeing the prosecution of the Action and the negotiations
14 leading to the Settlement, and I could and would testify competently to these matters.

15 **I. Oklahoma Firefighters’ Oversight of the Action**

16 3. Oklahoma Firefighters is a public pension fund that provides retirement allowances
17 and other benefits to firefighters in Oklahoma. As of June 30, 2025, the Oklahoma Firefighters had
18 over \$3.6 billion in assets under management on behalf of over 26,000 members. Oklahoma
19 Firefighters purchased iRhythm Technologies Inc. common stock during the Class Period and
20 suffered damages as a result of the violations of the federal securities laws alleged in the Action.

21 4. On May 15, 2024, the Court entered an Order appointing Oklahoma Firefighters as
22 the Lead Plaintiff in the Action pursuant to the PSLRA, and approved its selection of Bernstein
23 Litowitz Berger & Grossmann LLP (“BLB&G”) as Lead Counsel.

24 5. Oklahoma Firefighters has closely supervised, carefully monitored, and been actively
25 involved in all material aspects of the prosecution and resolution of the Action. Oklahoma
26

27 ¹ Unless otherwise indicated, capitalized terms shall have their meaning as defined in the Stipulation
28 and Agreement of Settlement, dated June 3, 2026 (Dkt. No. 147-1).

1 Firefighters' personnel had numerous communications during the litigation with Lead Counsel
 2 BLB&G. We received periodic status reports from BLB&G on case developments and participated
 3 in discussions with counsel concerning the prosecution of the Action, the strengths of and risks to
 4 the claims, and potential settlement. Throughout the course of this Action, I and other Oklahoma
 5 Firefighters personnel:

6 (a) communicated with BLB&G by email and telephone calls regarding the posture
 7 and progress of the case;

8 (b) reviewed the significant pleadings and briefs filed in this Action, including the
 9 First and Second Amended Class Action Complaints for Violations of the Federal Securities
 10 Laws ("Complaint"), Lead Plaintiff's oppositions to Defendants' motion to dismiss and
 11 Defendants' motion for judgment on the pleadings, and Lead Plaintiff's motion for class
 12 certification;

13 (c) reviewed and commented on the discovery requests served on Lead Plaintiff in
 14 this Action;

15 (d) assisted in searching for and producing documents and electronically stored
 16 information in response to Defendants' document requests to Lead Plaintiff;

17 (e) actively participated in the mediation process and consulted with BLB&G
 18 concerning the settlement negotiations as they progressed; and

19 (f) evaluated and approved the proposed Settlement.

20 6. I personally attended the Court's hearing on the motion to dismiss the Complaint on
 21 April 24, 2025; prepared for and sat for my deposition by Defendants as a Rule 30(b)(6)
 22 representative of Oklahoma Firefighters on December 10, 2025 in New York City; and attended the
 23 mediation session in New York City on April 2, 2026.

24 **II. Oklahoma Firefighters Endorses Approval of the Settlement**

25 7. Based on its involvement throughout the prosecution and resolution of the Action,
 26 Oklahoma Firefighters believes that the proposed Settlement is fair, reasonable, and adequate to the
 27 Settlement Class. Oklahoma Firefighters believes that the Settlement represents a very favorable
 28 recovery for the Settlement Class, in light of the significant risks of continuing to prosecute the

claims in this case, including the risks of establishing liability and proving damages. Therefore, the Oklahoma Firefighters endorses approval of the Settlement by the Court.

III. Oklahoma Firefighters Approves of and Supports Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses

8. Oklahoma Firefighters takes seriously its role as class representative to ensure that the attorneys' fees are fair in light of the result achieved in the Action and reasonably compensate Lead Counsel for the work involved and the risks it undertook in litigating the Action. Oklahoma Firefighters approves the attorneys' fees requested by Lead Counsel as fair and reasonable in light of the work Lead Counsel performed, the risks of the litigation, and the recovery obtained for the Settlement Class in this Action.

9. Oklahoma Firefighters further believes that Lead Counsel's Litigation Expenses are reasonable and represent costs and expenses necessary for the prosecution and resolution of the claims in the Action. Based on the foregoing, and consistent with its obligation to the class to obtain the best result at the most efficient cost, Oklahoma Firefighters fully supports Lead Counsel's motion for attorneys' fees and Litigation Expenses.

10. Oklahoma Firefighters understands that reimbursement of class representatives' reasonable costs and expenses is authorized under the PSLRA. For this reason, in connection with Lead Counsel's request for reimbursement of Litigation Expenses, Oklahoma Firefighters seeks reimbursement for costs and expenses that it incurred directly relating to its representation of the Settlement Class.

11. One of my responsibilities as Executive Director for Oklahoma Firefighters is to monitor outside litigation matters, including Oklahoma Firefighters' participation in securities class actions where (as here) it has been appointed lead plaintiff.

12. The time that I devoted to the representation of the Settlement Class in this Action was time that I otherwise would have spent on other work for Oklahoma Firefighters and, thus, represented a cost to Oklahoma Firefighters. Oklahoma Firefighters seeks reimbursement in the amount of \$9,600.00 for my time, which represents 80 hours at an hourly rate of \$120.00.

1 **IV. Conclusion**

2 13. In conclusion, Oklahoma Firefighters was actively involved throughout the
3 prosecution and settlement of the Action. Oklahoma Firefighters endorses the Settlement as fair,
4 reasonable, and adequate, and believes that the Settlement represents a favorable recovery for the
5 Settlement Class in light of the risks of continued litigation. Oklahoma Firefighters further supports
6 Lead Counsel's motion for attorneys' fees and Litigation Expenses and believes that it represents
7 fair and reasonable compensation for counsel in light of the recovery obtained for the Settlement
8 Class, the substantial work conducted, and the litigation risks. And finally, Oklahoma Firefighters
9 requests reimbursement under the PSLRA for the value of time dedicated by its employees as set
10 forth above. Accordingly, Oklahoma Firefighters respectfully requests that the Court approve
11 (i) Lead Plaintiff's motion for final approval of the proposed Settlement and Plan of Allocation; and
12 (ii) Lead Counsel's motion for attorneys' fees and Litigation Expenses.

13 I declare under penalty of perjury that the foregoing is true and correct, to the best of my
14 knowledge and belief, and that I have authority to execute this Declaration on behalf of Oklahoma
15 Firefighters.

16 Executed this 19th day of August, 2026.

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18 
19 CHASE RANKIN
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Exhibit 2

2025 REVIEW & ANALYSIS

Securities Class Action Settlements

REVIEW & ANALYSIS

CORNERSTONE RESEARCH

Economic and Financial Consulting and Expert Testimony

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2025 Highlights

While the number of securities class action settlements declined 16% from 2024, the median settlement amount grew by 20%, driven by an increase in settlement sizes for cases with only Securities Act of 1933 ('33 Act) claims.

In 2025, there were 74 securities class action settlements totaling \$3.0 billion, compared to 88 settlements totaling \$3.8 billion in 2024. (page 3)

The median settlement amount of \$17.3 million was the highest since 1997. For cases with only '33 Act claims, the median settlement amount more than tripled year-over-year to a historic high of \$32.5 million. Excluding cases with only '33 Act claims, the median settlement amount increased 11% from 2024 to \$16.0 million. (page 5)

The average settlement amount (\$40.6 million) decreased 7% from 2024, which reflects in part

mega settlements (of \$100 million or greater) that were smaller compared to those in recent years. (page 5)

Median plaintiff-style damages for cases with Section 10(b) claims¹ were flat year-over-year.² (page 6)

Median statutory damages for cases with only '33 Act claims declined 19%. (page 8)

Defendant firms involved in 2025 settlements were 9% smaller, as measured by median total assets, reflecting an eight-year low. (page 6)

The median "time to settle" (duration of case from filing to settlement hearing) of 3.5 years continues to be historically elevated, in line with the median in 2023–2024 (3.4 years). (page 13)

Health Care and Financials/Real Estate have historically been the industry sectors with the largest share of settlement dollars. However, in 2025, settlement dollars for these sectors declined to 10-year lows. (page 4)

Figure 1: Settlement Statistics
(Dollars in millions)

	2016–2024	2024	2025
Number of Settlements	752	88	74
Total Amount	\$38,135.6	\$3,833.8	\$3,006.5
Minimum	\$0.4	\$0.6	\$0.3
Median	\$12.1	\$14.4	\$17.3
Average	\$50.7	\$43.6	\$40.6
Maximum	\$3,849.7	\$503.3	\$433.5

Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

Author Commentary

FINDINGS

Securities class action settlement activity declined in 2025 as measured by the 16% drop in the number of settled cases. Aggregate settlement dollars were also lower, reflecting in part mega settlements that were significantly smaller compared to prior years.

The median settlement amount, however, reached a historic high, even though median plaintiff-style damages—a proxy for the amount of potential investor losses that plaintiffs may claim in a securities class action with Rule 10b-5 claims—remained essentially unchanged from 2024.

The higher median settlement amount in 2025 is attributable in part to larger settlements for cases with only '33 Act claims. The median settlement amount for cases with only '33 Act claims surged to a historic high of \$32.5 million in 2025, despite a decrease in median statutory damages. One factor that may explain these larger settlements is that these cases may have been unusually complex; the median number of docket entries—a proxy for the time and effort expended by the litigants and/or case complexity—was at an all-time high.

Eric Tam, Principal at Cornerstone Research

“The shift of settlement dollars from the Health Care and Financials/Real Estate sectors to the Communication Services/Information Technology sectors in recent years may reflect changes in case filing trends.”

Only nine settlements (12%) were related to special purpose acquisition companies (SPACs), down from 17 such settlements (19%) in 2024.

Laarni T. Bulan, Vice President at Cornerstone Research

“Median plaintiff-style damages stayed flat as the median size (measured by total assets) of issuer defendants declined 9% from 2024. In contrast, the median settlement amount reached the highest level since 1997, due in part to larger '33 Act only settlements.”

For the second year in a row, the median (\$11.0 million) and average (\$31.4 million) settlement amounts for SPAC cases were substantially smaller than the corresponding amounts for non-SPAC cases. The smaller number of SPAC-related settlements may also have contributed to the higher median settlement amount in 2025.

Longer-term settlement trends are potentially evolving across industry sectors. While the Health Care and Financials/Real Estate sectors had the largest aggregate settlement dollars and number of mega settlements during 2016–2020, the Communication Services/Information Technology sectors took the lead in the most recent five-year period.

LOOKING AHEAD

The lower number of settled cases compared to prior years may continue given the relatively stable number of securities case filings in the first half of this decade. In addition, COVID-19-related cases, while comprising a large percentage of filings in 2022–2023, have been dismissed at a high rate.³ On the other hand, several large settlements pending court approval may boost aggregate settlement dollars in 2026.

Total Settlement Dollars

In 2025, total settlement dollars declined by 22%, consistent with a 16% decline in the number of settled cases from the prior year.

Mega settlements (of \$100 million or greater) that were smaller compared to those in recent years also contributed to the lower total settlement dollars. While the number of mega settlements (eight) increased by one from 2024, the average mega settlement in 2025 was \$200 million, down 33% from the prior year.

-22%

Change in total settlement dollars from 2024 to 2025

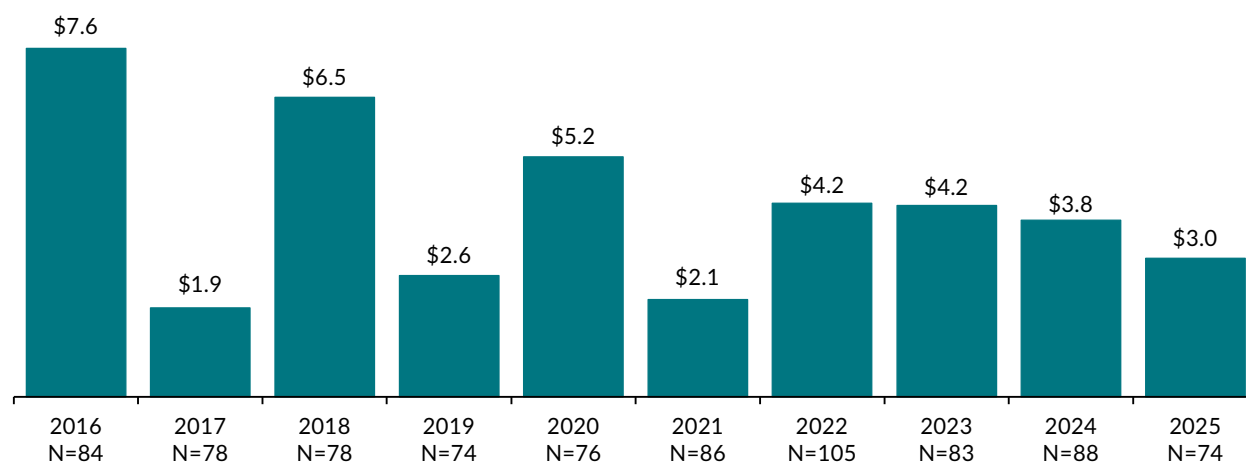
-16%

Change in number of settled cases from 2024 to 2025

Figure 2: Total Settlement Dollars

2016–2025

(Dollars in billions)



Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. "N" refers to the number of settlements.

Figure 3: Mega Settlements

(Dollars in millions)

Year	Number of Mega Settlements	Number of Mega Settlements as a Percentage of All Settlements	Total Mega Settlement Dollars as a Percentage of All Settlement Dollars	Median Mega Settlement	Average Mega Settlement
2016–2024	56	7%	65%	\$214	\$441
2024	7	8%	54%	\$205	\$298
2025	8	11%	53%	\$144	\$200

Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. Mega settlements are defined as total settlement funds of \$100 million or greater before adjusting for inflation.

Industry Sectors

Consistent with case filing trends, Health Care and Financials/Real Estate represent the industry sectors with the largest share of settlement dollars over the last 10 years (2016–2025).⁴ However, total settlement dollars in the Health Care and Financials/Real Estate sectors in 2025 declined by 56% and 37%, respectively, year-over-year and reached their lowest levels in the past 10 years.

For the fourth time in the past five years, settlement dollars in the Communication Services/Information Technology sectors were greater than any other industry sector.

See Appendix 1 for additional analysis of settlements by industry sectors.

Figure 4: Total Settlement Dollars by Year and Industry Sectors
2016–2025
(Dollars in Millions)

Year	Communication Services/ Information Technology	Consumer Discretionary	Consumer Staples	Energy/ Materials	Financials/ Real Estate	Health Care	Industrials	Utilities
2016	\$239	\$712	\$63	\$422	\$3,192	\$2,903	\$29	\$2
2017	\$134	\$206	\$4	\$429	\$434	\$614	\$106	\$4
2018	\$572	\$246	\$54	\$3,863	\$1,129	\$437	\$117	\$81
2019	\$135	\$802	\$247	\$611	\$167	\$504	\$164	\$0
2020	\$609	\$469	\$77	\$112	\$1,432	\$1,940	\$333	\$240
2021	\$715	\$32	\$65	\$164	\$212	\$574	\$229	\$120
2022	\$1,318	\$621	\$259	\$175	\$188	\$1,169	\$466	\$7
2023	\$453	\$278	\$504	\$202	\$1,663	\$735	\$134	\$183
2024	\$1,281	\$570	\$225	\$224	\$164	\$853	\$517	\$0
2025	\$705	\$664	\$121	\$502	\$104	\$377	\$511	\$23
2016–2025	\$6,162	\$4,599	\$1,621	\$6,703	\$8,683	\$10,107	\$2,607	\$661
	\$0–\$249	\$250–\$749	\$750–\$1,499	\$1,500+				

Note: Industry sectors are based on the Global Industry Classification Standard (GICS). Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

Figure 5: Number of Settlements by Year and Industry Sectors
2016–2025

Year	Communication Services/ Information Technology	Consumer Discretionary	Consumer Staples	Energy/ Materials	Financials/ Real Estate	Health Care	Industrials	Utilities
2016	18	12	1	11	10	26	5	1
2017	16	10	2	10	14	14	11	1
2018	23	8	3	2	8	24	8	2
2019	10	13	4	5	10	22	10	0
2020	14	10	4	6	7	24	10	1
2021	23	5	3	10	8	26	8	3
2022	18	16	5	7	10	30	18	1
2023	16	8	4	10	12	22	10	1
2024	19	9	5	11	12	21	11	0
2025	19	10	4	6	7	19	8	1
2016–2025	176	101	35	78	98	228	99	11
	0–4	5–14	15–24	25+				

Note: Industry sectors are based on the Global Industry Classification Standard (GICS).

Settlement Size

The median settlement amount in 2025 was \$17.3 million, a 20% increase from 2024 and the highest since 1997.

The average settlement amount of \$40.6 million declined 7% from 2024, reflecting in part the smaller mega settlements in 2025.

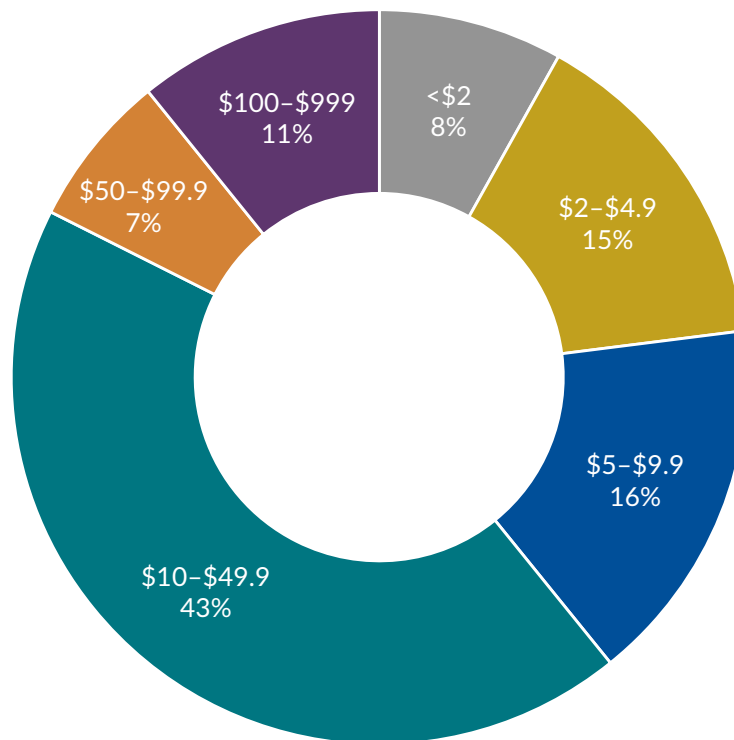
The proportion of settlements involving issuers that had been delisted from a major exchange and/or declared bankruptcy prior to settlement increased from 15% in 2024 to 23% in 2025. The number of settled cases related to SPACs declined nearly 50% from 2024 to nine such

Settlements in the \$10 million to \$50 million range accounted for 43% of settlements in 2025.

cases in 2025. The median and average settlement amounts for these cases were \$11.0 million and \$31.4 million, respectively, compared to \$19.5 million and \$41.9 million for non-SPAC cases in 2025.

See Appendix 2 for a distribution of settlement amounts.

Figure 6: Proportion of Settled Cases by Settlement Dollar Range 2025
(Dollars in millions)



Note: Percentages indicate the proportion of settled cases in the given settlement dollar range. Percentages may not sum to 100% due to rounding.

Type of Claim and Potential Investor Losses

RULE 10B-5 CLAIMS AND PLAINTIFF-STYLE DAMAGES

For cases with Rule 10b-5 claims, Cornerstone Research's analysis finds a proxy for potential investor losses—referred to here as plaintiff-style damages—to be the most important determinant of settlement outcomes based on regression analysis. However, plaintiff-style damages do not represent actual economic losses borne by shareholders. Determining any such economic losses for a given case requires more in-depth analysis.

- 0.6%

Change in median plaintiff-style damages from 2024 to 2025

\$16.0 million

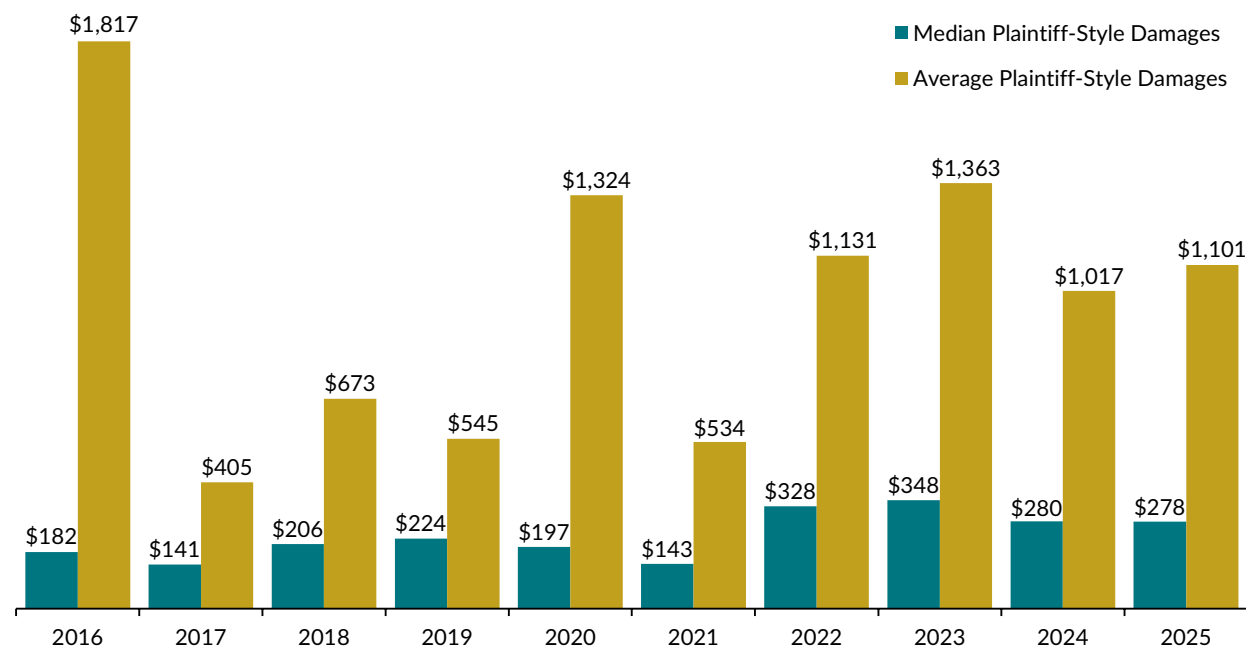
Median settlement for cases with Rule 10b-5 claims in 2025

In 2025, median plaintiff-style damages were essentially unchanged year-over-year and remained at the elevated levels observed in recent years.

Median total assets of issuer defendants decreased 9% from 2024 to an eight-year low.

Figure 7: Median and Average Plaintiff-Style Damages

2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: Plaintiff-style damages are adjusted for inflation based on class period end dates and are estimated for common stock/ADR/ADS only; 2025 dollar equivalent figures are presented. Plaintiff-style damages are estimated for cases that allege a claim under Rule 10b-5 (whether alone or in addition to other claims).

Larger cases, as measured by plaintiff-style damages, typically settle for a smaller percentage of those damages.

In 2025, nearly 40% of settlements were in the Ninth Circuit, the highest percentage since 1999. The median settlement as a percentage of plaintiff-style damages (4.7%) was the lowest ever observed for Ninth Circuit settlements.

For the second year in a row, the Second Circuit comprised 23% of settlements in 2025, below the prior nine-year average (2016–2024) of 28%. The median settlement as a percentage of plaintiff-style damages (11.9%) was the highest observed in the Second Circuit since 2019.

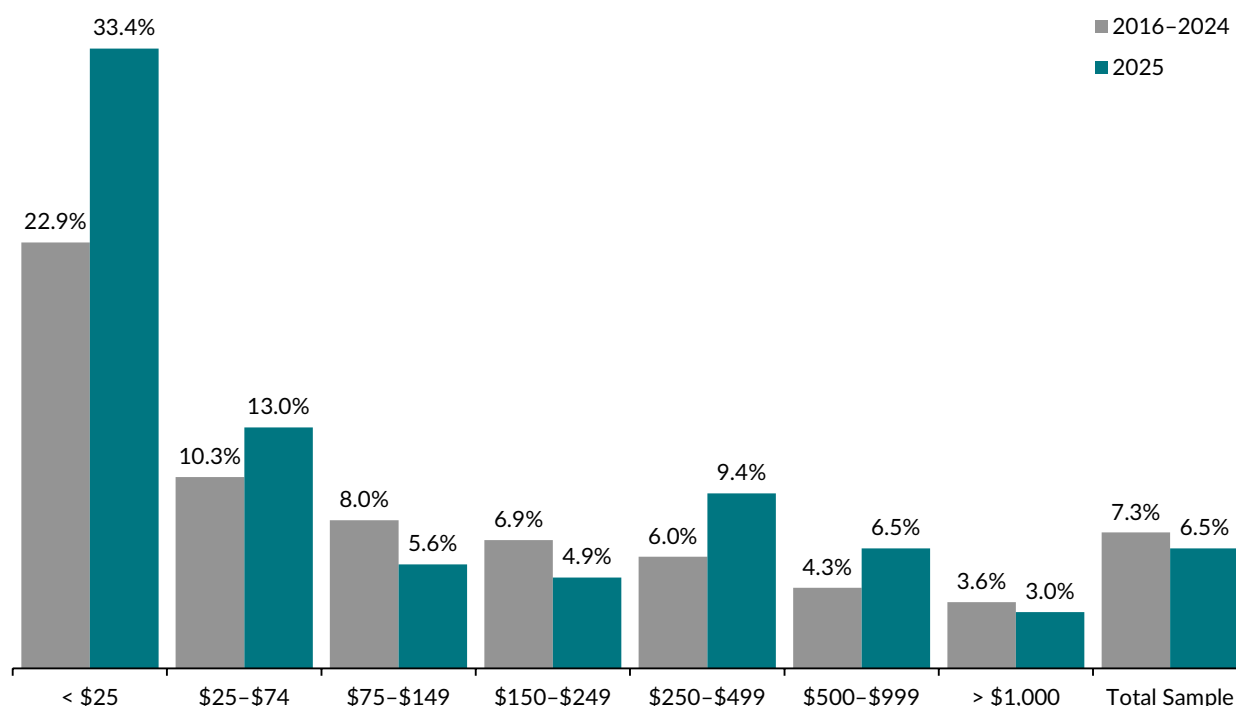
The median settlement as a percentage of plaintiff-style damages for issuers in the

In 2025, the median settlement as a percentage of plaintiff-style damages was 6.5%—a decrease from 2024 (7.0%) and lower than the 2016–2024 median (7.3%).

Financials/Real Estate industry sector was 9.9% over the past 10 years, higher than the median of 6.8% for issuers in all other industry sectors.

See Appendix 3 and Appendix 4 for more information on settlements as a percentage of plaintiff-style damages and settlement statistics by federal circuit court, respectively.

Figure 8: Median Settlement as a Percentage of Plaintiff-Style Damages by Damages Ranges
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: Plaintiff-style damages are adjusted for inflation based on class period end dates and are estimated for common stock/ADR/ADS only; 2025 dollar equivalent figures are presented. Plaintiff-style damages are estimated for cases that allege a claim under Rule 10b-5 (whether alone or in addition to other claims).

'33 ACT CLAIMS AND STATUTORY DAMAGES

For cases with only '33 Act claims—those involving Section 11 and/or Section 12(a)(2) claims and no Rule 10b-5 claims—potential investor losses (referred to here as “statutory damages”) are estimated based on the difference between the statutory purchase and sales prices for those shares that are assumed to be traceable to the registration statement at issue.⁵

There were nine settlements with only '33 Act claims in 2025, of which six cases involved an initial public offering (IPO).

-19%

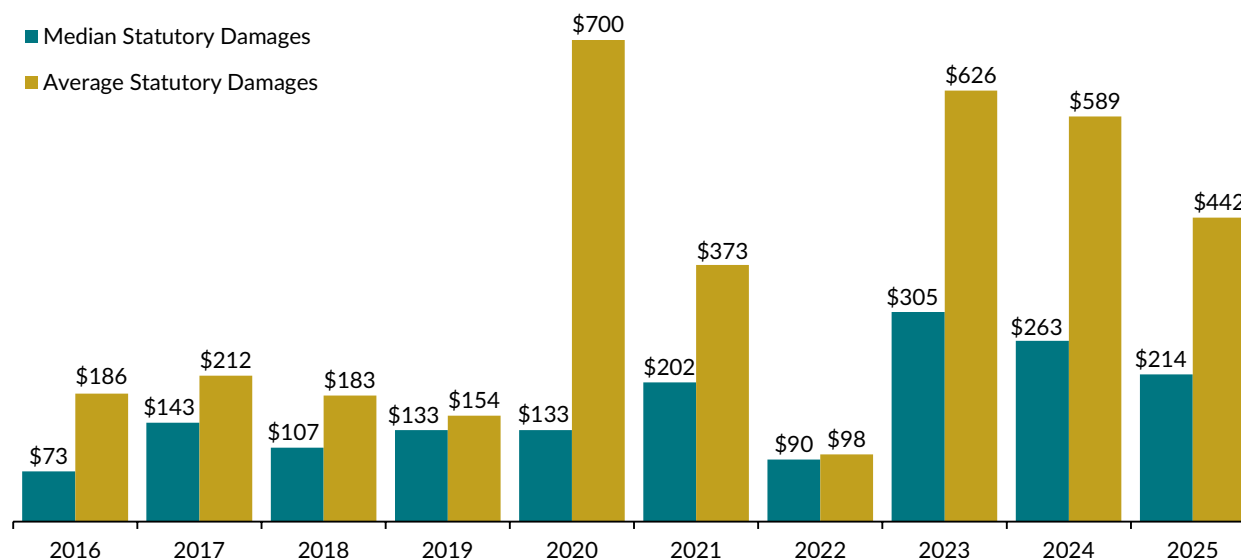
Change in median statutory damages from 2024 to 2025

\$32.5 million

Median settlement for cases with only '33 Act claims in 2025

The median settlement amount for cases with only '33 Act claims (\$32.5 million) reached an all-time high in 2025 and was 3.1 times the median for the prior nine years.

Figure 9: Median and Average Statutory Damages
2016–2025, Settlements with Only '33 Act Claims
(Dollars in millions)



Note: Statutory damages are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis excludes cases that allege Rule 10b-5 claims.

In 2025, the median settlement as a percentage of statutory damages (12.9%) reached its highest level since 2018.

Similarly, the median number of docket entries for cases with only '33 Act claims reached an all-time high in 2025. This is consistent with the historically high median settlement and the increase in median settlement as a percentage of statutory damages for these cases. Cornerstone Research's analysis finds that the number of docket entries—a proxy for the time and effort expended by the litigants and/or case complexity—is positively associated with settlement amounts.

See Appendix 5 and Appendix 6 for additional information on statutory damages and settlement as a percentage of statutory damages, respectively.

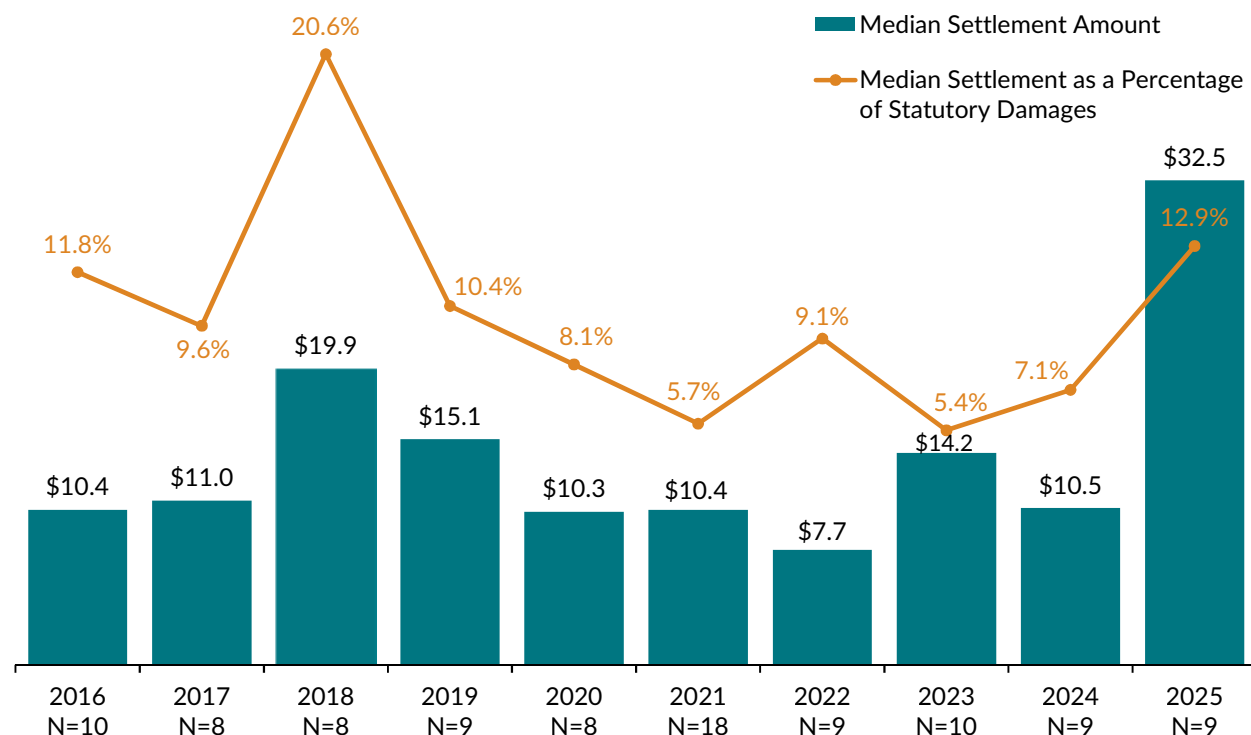
12.9%

Median settlement as a percentage of statutory damages in 2025

206

Median number of docket entries for cases with only '33 Act claims in 2025

Figure 10: Median Settlement Amount and Settlement as a Percentage of Statutory Damages
2016–2025, Settlements with Only '33 Act Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis excludes cases that allege Rule 10b-5 claims.

Analysis of Settlement Characteristics

GAAP VIOLATIONS

This analysis examines allegations of GAAP violations in settlements of securities class actions with Rule 10b-5 claims, including two subcategories of GAAP violations—financial restatements and accounting irregularities.⁶

The percentages of settled cases involving GAAP violations generally and financial restatements specifically have declined substantially in the past five years (2021–2025) compared to the prior five years (2016–2020).

While cases with accounting irregularities comprised only a small proportion of total settled cases between 2016 and 2025, the median settlement amount for cases with Rule 10b-5 claims involving accounting irregularities was \$32 million, significantly higher than the \$13 million median for cases without such allegations.

For additional details regarding securities class action settlements that involve accounting allegations, see Cornerstone Research's forthcoming annual report on [Accounting Class Action Filings and Settlements](#).⁷

Figure 11: Percentage of Settled Cases Involving Accounting Allegations

	2016–2020	2021–2025
GAAP Violations	50%	37%
Financial Restatements	24%	14%
Accounting Irregularities	3%	1%
Auditor Codefendant	7%	3%

Note: This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

DERIVATIVE ACTIONS

Securities class actions often involve an accompanying (parallel) derivative action with similar claims, and all else being equal, such cases have historically settled for higher amounts than securities class actions without an accompanying derivative matter.⁸

In 2025, the median settlement for cases with an accompanying derivative action declined by 16% from the 2024 median.

For more information on settlement outcomes of the accompanying derivative actions, see Cornerstone Research's [Parallel Derivative Action Settlement Outcomes](#).⁹

49%

Percentage of 2025 cases involving an accompanying derivative action

\$16.0 million

Median settlement for 2025 cases involving an accompanying derivative action

Figure 12: Median Settlement Amount for Cases with an Accompanying Derivative Action
 2016–2025
 (Dollars in millions)

Year	With Accompanying Derivative Action	Without Accompanying Derivative Action	Percentage of Cases with Accompanying Derivative Action
2016	\$16.1	\$11.4	41.7%
2017	\$5.9	\$8.2	47.4%
2018	\$23.8	\$7.7	51.3%
2019	\$12.3	\$17.6	54.1%
2020	\$19.3	\$10.6	53.9%
2021	\$10.0	\$8.9	41.9%
2022	\$15.5	\$12.1	44.8%
2023	\$20.6	\$13.2	41.0%
2024	\$19.1	\$10.4	52.3%
2025	\$16.0	\$19.8	48.6%
2016–2025	\$15.1	\$11.0	47.5%

Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

INSTITUTIONAL INVESTORS

Institutional investors are often involved as lead or co-lead plaintiff in larger cases,¹⁰ that is, cases with higher plaintiff-style damages and higher issuer defendant total assets.

In 2025, settlements involving an institutional investor as lead or co-lead plaintiff had median plaintiff-style damages and median total assets

that were 4.1 times and 5.6 times higher, respectively, than the median values for cases without an institutional investor in that role.

Similarly, the median settlement amount for cases with an institutional investor lead or co-lead plaintiff was 4.8 times higher than for cases without such participation.

Figure 13: Median Statistics by Institutional Investor Participation as Lead or Co-Lead Plaintiff 2025

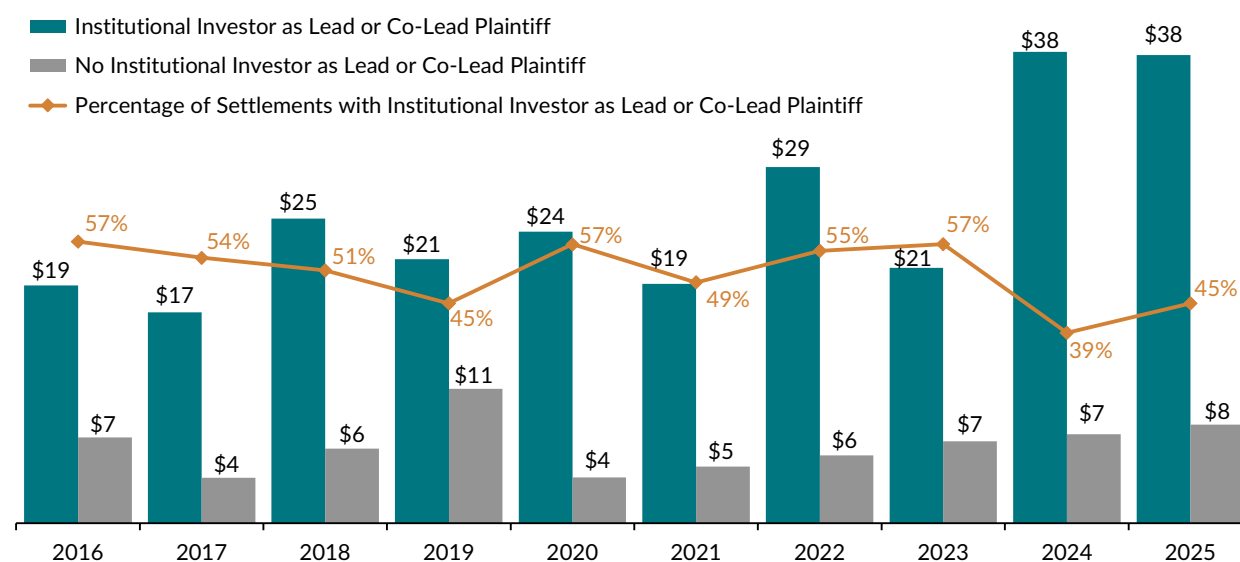
(Dollars in millions)

	With an Institutional Investor	Without an Institutional Investor
Settlement Amount	\$38	\$8
Plaintiff-Style Damages	\$669	\$164
Settlement Amount as a Percentage of Plaintiff-Style Damages	6.6%	6.3%
Issuer Defendant Total Assets	\$3,303	\$594
Percentage of Settlements	45%	55%

Note: Plaintiff-style damages are estimated for cases that allege Rule 10b-5 claims (whether alone or in addition to other claims) and are adjusted for inflation based on class period end dates; 2025 dollar equivalent figures are presented.

Figure 14: Median Settlement Amount by Institutional Investor Participation as Lead or Co-Lead Plaintiff 2016–2025

(Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented.

Time to Settlement and Case Complexity

The median duration from case filing to settlement hearing was 3.5 years, which increased nearly 10% from the median time to settle in 2024 (3.2 years) and was slightly below the peak over the last decade observed in 2023 (3.7 years). The median time to settle in 2025 was the second-longest duration in the last decade.

This finding is consistent with heightened case activity among 2025 settled cases, as measured by the number of docket entries—a proxy for the time and effort expended by the litigants and/or case complexity. In 2025, the median number of docket entries was at its highest level since 2010.

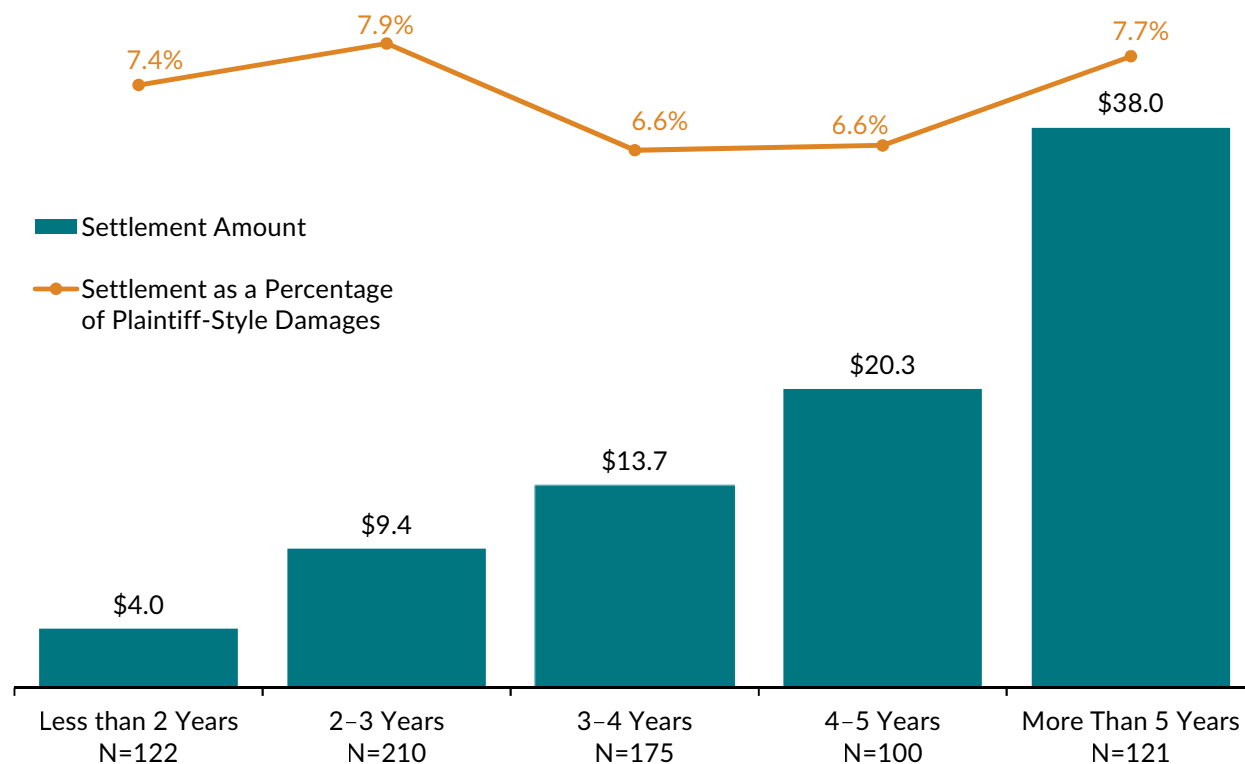
3.5 years

2025 median time to settlement

150

Median number of docket entries for 2025 cases

Figure 15: Median Settlement Amount and Settlement as a Percentage of Plaintiff-Style Damages by Duration from Filing Date to Settlement Hearing Date
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

Case Stage at the Time of Settlement

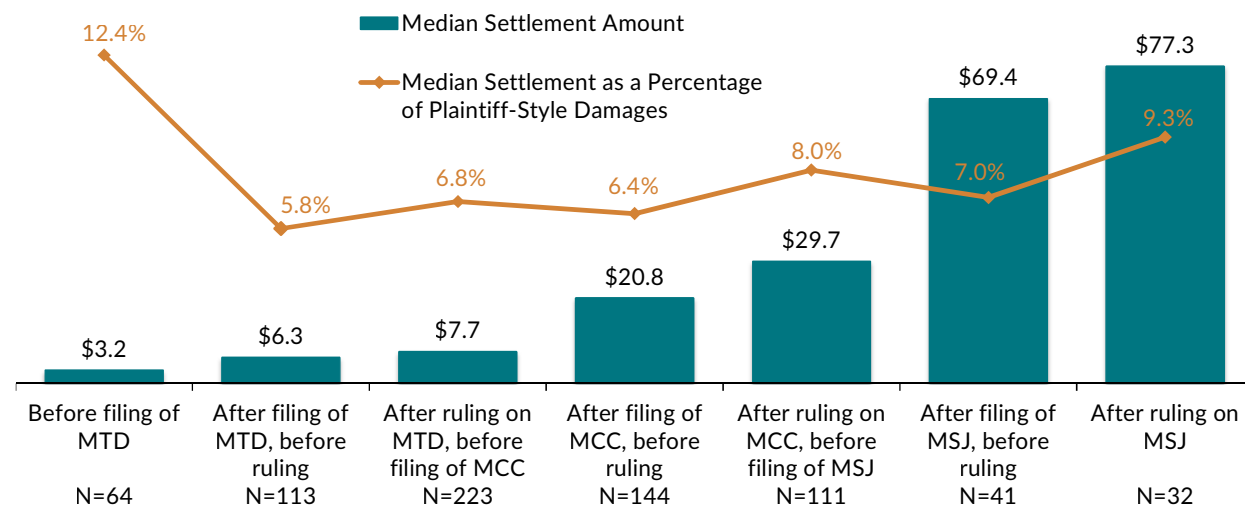
In 2025, 8% of cases settled prior to the filing of a motion to dismiss (MTD), up from 2% in 2024 and equal to the 2016–2024 average.

Moreover, 54% of settlements occurred prior to the filing of a motion for class certification (MCC), up from 48% in 2024 and equal to the 2016–2024 average. Cases that settled after the filing of a MCC were twice as likely to have an

institutional investor serving as lead or co-lead plaintiff than cases that settled prior to the filing of a MCC.

In the 10-year period from 2016 to 2025, median plaintiff-style damages for cases that settled after the filing of a motion for summary judgment (MSJ) was over six times the median for cases that settled before a MSJ filing.

Figure 16: Median Settlement Amount and Stage of Litigation at Time of Settlement
2016–2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. MTD refers to "motion to dismiss," MCC refers to "motion for class certification," and MSJ refers to "motion for summary judgment." This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

Figure 17: Median Statistics for Cases that Settled Prior to and After MCC Filing
2025, Settlements with Rule 10b-5 Claims
(Dollars in millions)

	Settled Prior to MCC Filing	Settled After MCC Filing
Settlement Amount	\$6	\$38
Plaintiff-Style Damages	\$94	\$490
Settlement Amount as a Percentage of Plaintiff-Style Damages	5.3%	7.1%
Total Assets	\$599	\$6,069
Percentage of Settlements	58%	42%

Note: MCC refers to "motion for class certification." Plaintiff-style damages are estimated for cases that allege Rule 10b-5 claims (whether alone or in addition to other claims) and are adjusted for inflation based on class period end dates; 2025 dollar equivalent figures are presented.

Cornerstone Research's Settlement Analysis

This research examines the relationship between settlement outcomes and certain securities case characteristics. Regression analysis is employed to better understand the factors that inform case settlements given the characteristics of a particular securities class action.

DETERMINANTS OF SETTLEMENT OUTCOMES

Based on regression analysis, important determinants of settlement amounts include the following:

- Plaintiff-style damages
- The most recently reported total assets prior to the settlement hearing date for the defendant issuer
- Whether there were accounting irregularities
- Whether there were criminal charges against the issuer, officers, directors, or other defendants with allegations similar to those included in the underlying class action complaint
- Whether there was a derivative action with allegations similar to those included in the underlying class action complaint

- Whether, in addition to Rule 10b-5 claims, Section 11 claims were alleged and not dismissed prior to settlement
- Whether the issuer had been delisted from a major exchange and/or had declared bankruptcy
- Whether an institutional investor acted as lead or co-lead plaintiff
- Whether securities other than common stock/ADR/ADS were included in the alleged class

Cornerstone Research analyses show that, all else being equal, settlement amounts tended to be higher in cases involving larger plaintiff-style damages, greater issuer defendant total assets, or cases in which Section 11 claims were alleged in addition to Rule 10b-5 claims.

Settlement amounts also tended to be higher in cases that involved accounting irregularities, criminal charges, an accompanying derivative action, an institutional investor lead or co-lead plaintiff, or with securities in addition to common stock/ADR/ADS included in the alleged class.

Settlement amounts tended to be lower if the issuer had been delisted from a major exchange and/or had declared bankruptcy.

Collectively, the factors above explain approximately 75% of the variation in settlement outcomes.

Research Sample

The database compiled for this report is limited to cases that allege Rule 10b-5, Section 11, and/or Section 12(a)(2) claims brought by purchasers of a corporation's common stock.

Cases with alleged classes of only bondholders, preferred stockholders, etc.; cases that allege fraudulent deflation in price; and mergers and acquisitions cases are excluded. These criteria are imposed to ensure data availability and to utilize a relatively homogeneous set of cases in terms of the nature of the allegations.

The database includes over 2,340 securities class actions filed after passage of the Reform Act (1995) and settled from 1996 through 2025. These securities class actions correspond to approximately \$155.5 billion in total settlement

dollars, adjusted for inflation and expressed in 2025 dollars. These settlements are identified based on a review of case activity collected by Securities Class Action Services LLC (SCAS).¹¹

The designated settlement year, for purposes of this report, corresponds to the year in which the hearing to approve the settlement was held.¹² Cases involving multiple settlements are reflected in the year of the most recent partial settlement, provided certain conditions are met.¹³

In addition to SCAS, data sources include Bloomberg, the Center for Research in Security Prices (CRSP) at the University of Chicago Booth School of Business, LSEG Workspace, court filings and dockets, SEC registrant filings, SEC litigation releases and administrative proceedings, LexisNexis, Stanford Securities Litigation Analytics (SSLA), and public press.

Endnotes

- ¹ For purposes of the settlement research and modeling, this report utilizes a measure of potential investor losses that allows for consistency across a large volume of cases, thus enabling the identification and analysis of potential trends. This measure, “settlement model plaintiff-style damages” (“plaintiff-style damages” as referred to in this report), is estimated using a methodology that more closely aligns with approaches used by plaintiffs in the current securities class action litigation environment. For example, when estimating the number of shares eligible for damages, the plaintiff-style damages approach adjusts for short interest positions and shares estimated to be held by institutional investors throughout the entire class period.
- ² Plaintiff-style damages are calculated for cases that settled in 2014 or later, and account for the U.S. Supreme Court’s 2005 landmark decision in *Dura Pharmaceuticals Inc. v. Broudo*, 544 U.S. 336. Plaintiff-style damages are based on the stock-price movements associated with the alleged disclosure dates that are described in the settlement plan of allocation.
- ³ [Securities Class Action Filings—2025 Year in Review](#), Cornerstone Research (2026).
- ⁴ [Securities Class Action Filings—2025 Year in Review](#), Cornerstone Research (2026).
- ⁵ Statutory damages are estimated using an approach that more closely aligns with approaches used by plaintiffs in the current securities class action litigation environment. For example, when estimating the number of shares eligible for damages, the statutory damages approach adjusts for short interest positions. Statutory damages are calculated using data through the settlement hearing date.
- ⁶ The two subcategories of accounting issues analyzed in this report are (1) financial restatements—cases involving a restatement (or announcement of a restatement) of financial statements, and (2) accounting irregularities—cases in which the defendant has reported the occurrence of accounting irregularities (intentional misstatements or omissions) in its financial statements.
- ⁷ [Accounting Class Action Filings and Settlements—2025 Review and Analysis](#), Cornerstone Research, forthcoming in spring 2026.
- ⁸ To be considered an accompanying (parallel) derivative action, the derivative action must have underlying allegations that are similar or related to the underlying allegations of the securities class action and either be active or settling at the same time as the securities class action.
- ⁹ [Parallel Derivative Action Settlements Update: August 2025](#), Cornerstone Research (2025).
- ¹⁰ As discussed in prior reports, increasing institutional investor participation as lead plaintiff in securities litigation was a focus of the Private Securities Litigation Reform Act of 1995 (Reform Act). In the years following passage of the Reform Act, institutional investor involvement as lead plaintiff did increase, particularly in cases with higher plaintiff-style damages.
- ¹¹ Available on a subscription basis. For further details, see <https://www.issgovernance.com/securities-class-action-services/>.
- ¹² Movements of partial settlements between years can cause settlement amounts reported for prior years to differ from those presented in earlier reports.
- ¹³ This categorization is based on the timing of the settlement hearing date. If a new partial settlement equals or exceeds 50% of the then-current settlement fund amount, the entirety of the settlement amount is recategorized to reflect the settlement hearing date of the most recent partial settlement. If a subsequent partial settlement is less than 50% of the then-current total, the partial settlement is added to the total settlement amount and the settlement hearing date is left unchanged.

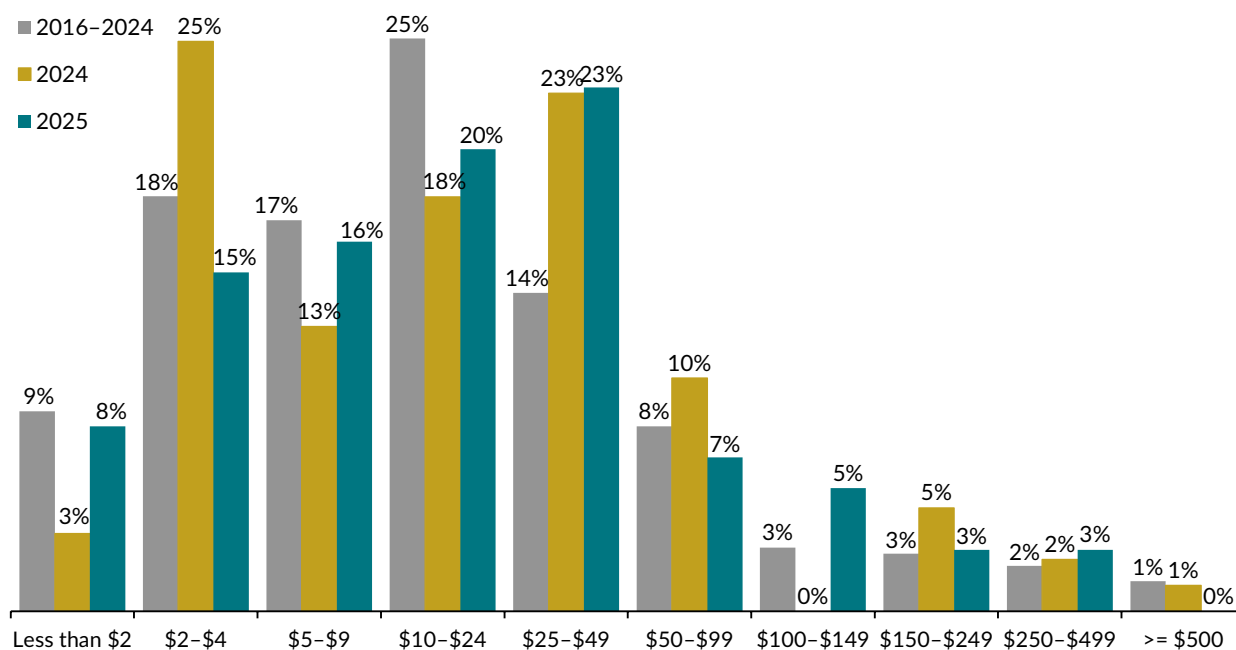
Appendices

Appendix 1: Settlements by Industry Sectors 2016–2025, Settlements with Rule 10b-5 Claims (Dollars in millions)

Industry	Number of Settlements	Median Settlement	Median Plaintiff-Style Damages	Median Settlement as a Percentage of Plaintiff-Style Damages
Consumer Services/ Information Technology	142	\$10.1	\$242.4	6.4%
Consumer Discretionary	92	\$14.1	\$278.0	6.9%
Consumer Staples	28	\$14.9	\$361.0	6.0%
Energy/Materials	70	\$17.3	\$281.1	8.4%
Financials/Real Estate	90	\$19.3	\$252.5	9.9%
Health Care	209	\$12.1	\$226.7	6.7%
Industrials	87	\$8.7	\$180.6	6.6%
Utilities	10	\$15.4	\$147.4	9.4%

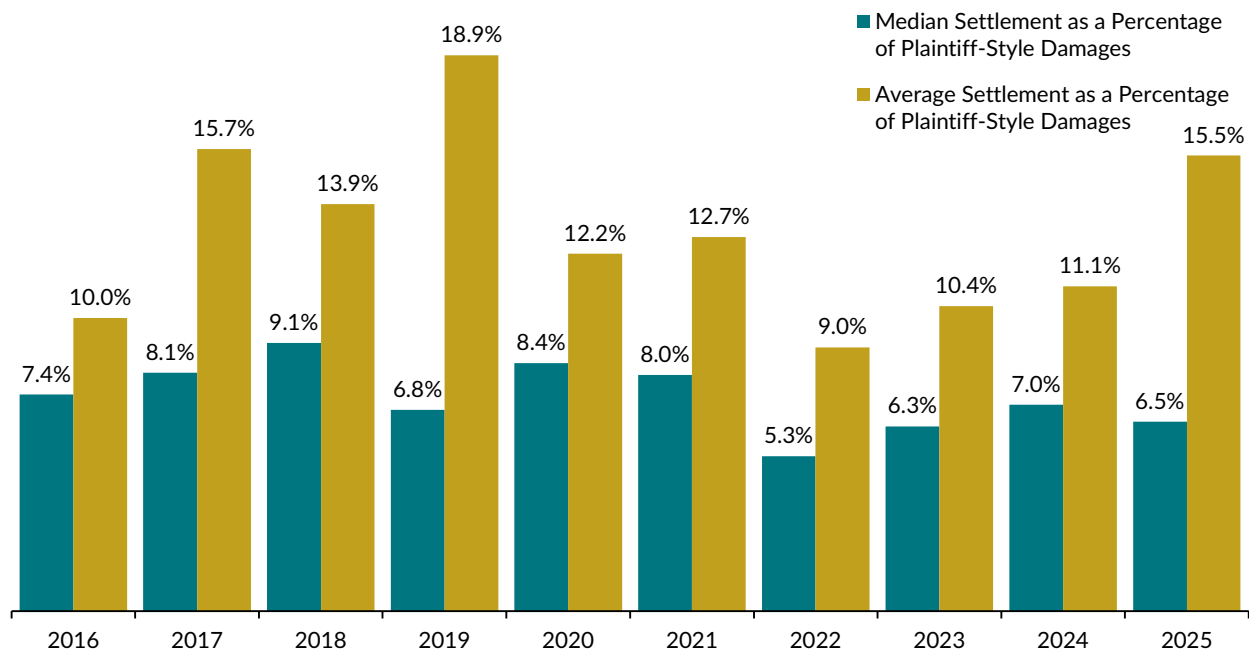
Note: Settlement dollars and plaintiff-style damages are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims). Industry sectors are based on the Global Industry Classification Standard (GICS).

Appendix 2: Distribution of Settlements Amounts 2016–2025 (Dollars in millions)



Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. Percentages may not sum to 100% due to rounding.

Appendix 3: Median and Average Settlements as a Percentage of Plaintiff-Style Damages 2016–2025, Settlements with Rule 10b-5 Claims



Note: Plaintiff-style damages are calculated for cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

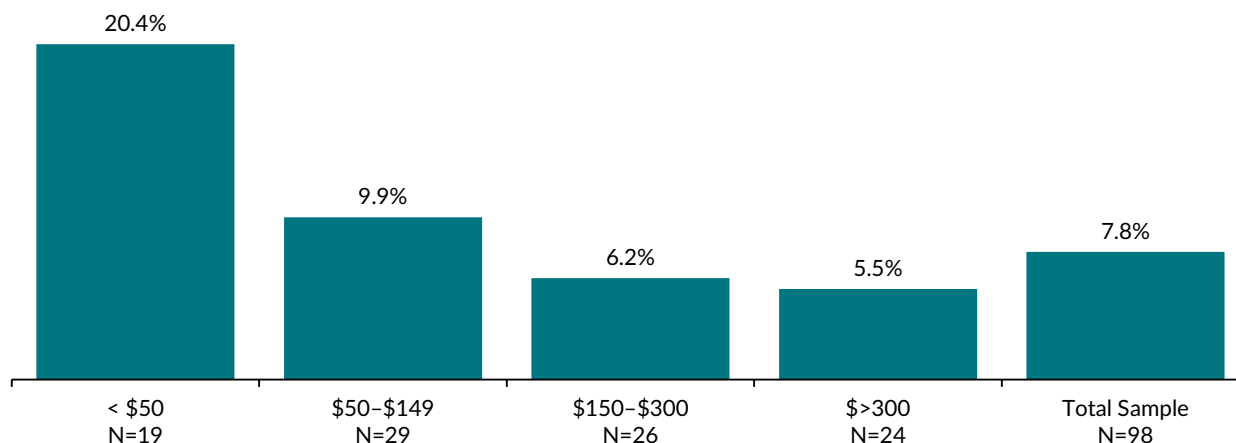
Appendix 4: Settlement Statistics by Federal Circuit Court 2016–2025, Settlements with Rule 10b-5 Claims (Dollars in millions)

Circuit	Number of Settlements	Median Settlement	Median Settlement as a Percentage of Plaintiff-Style Damages
First	21	\$23.2	4.1%
Second	203	\$9.8	7.7%
Third	90	\$9.2	7.0%
Fourth	24	\$30.3	4.6%
Fifth	40	\$13.8	5.6%
Sixth	32	\$18.1	9.7%
Seventh	38	\$20.1	6.7%
Eighth	12	\$51.1	5.6%
Ninth	205	\$11.0	7.0%
Tenth	23	\$20.0	10.1%
Eleventh	36	\$12.7	7.8%
DC	4	\$29.5	4.8%

Note: Settlement dollars are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis is limited to cases that allege Rule 10b-5 claims (whether alone or in addition to other claims).

Appendix 5: Median Settlement as a Percentage of Statutory Damages by Damages Ranges

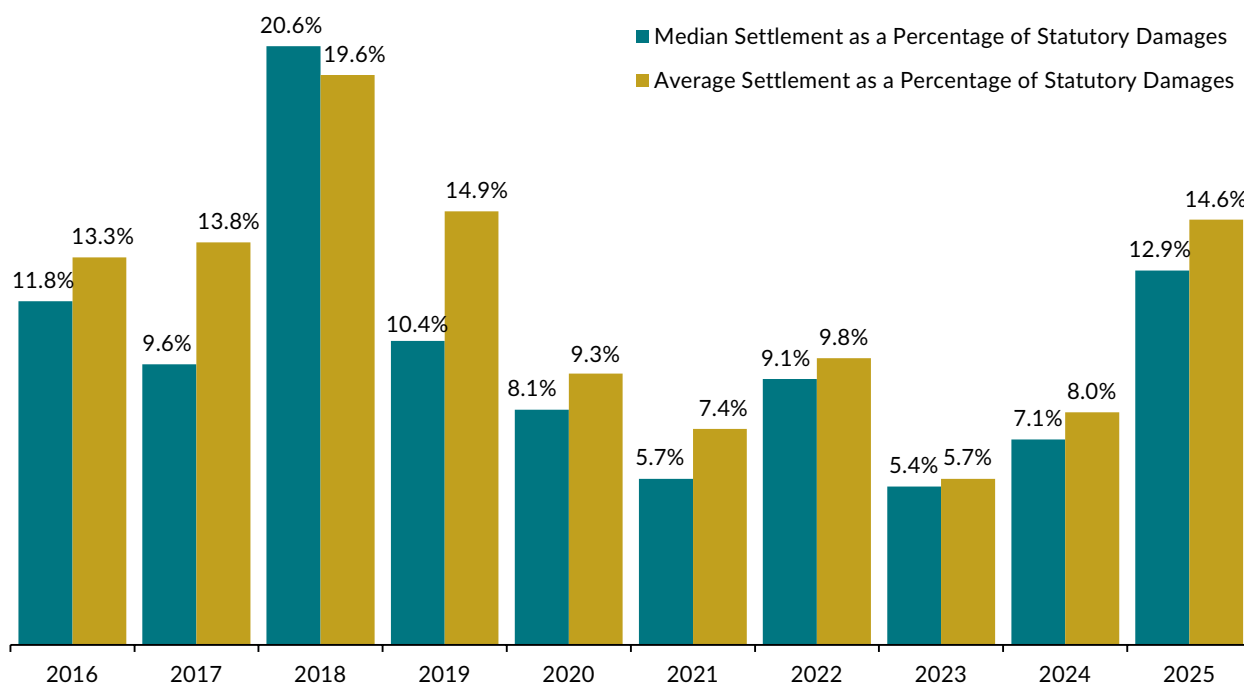
2016–2025, Settlements with Only '33 Act Claims
(Dollars in millions)



Note: "N" refers to the number of cases. Statutory damages are adjusted for inflation; 2025 dollar equivalent figures are presented. This analysis excludes cases that allege Rule 10b-5 claims.

Appendix 6: Median and Average Settlement as a Percentage of Statutory Damages

2016–2025, Settlements with Only '33 Act Claims



Note: This analysis excludes cases that allege Rule 10b-5 claims.

Appendix 7: Settlements by Nature of Claim

2016–2025

	Number of Settlements	Median Settlement	Median Statutory Damages	Median Settlement as a Percentage of Statutory Damages
'33 Act Only	98	\$10.8	\$155.9	7.8%
	Number of Settlements	Median Settlement	Median Plaintiff-Style Damages	Median Settlement as a Percentage of Plaintiff-Style Damages
Both Rule 10b-5 and '33 Act Claims	123	\$16.7	\$244.7	10.8%
Rule 10b-5 Only	605	\$12.3	\$236.3	6.8%

Note: Settlement dollars and damages are adjusted for inflation; 2025 dollar equivalent figures are presented.

About the Authors

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Vice President, Cornerstone Research

Laarni Bulan has over 14 years of experience consulting on complex litigation involving economic and financial issues. Dr. Bulan specializes in securities, mergers and acquisitions and other corporate transactions, firm valuation, risk management, executive compensation, and corporate governance matters.

Dr. Bulan serves as co-head of the firm's corporate governance practice. She is a member of the Advisory Board of the Institute for Law and Economics, University of Pennsylvania Carey Law School.

Dr. Bulan has published numerous articles in peer-reviewed journals, including *Financial Management*, the *Journal of Banking and Finance*, the *Journal of Economics and Business*, and the *Journal of Urban Economics*. Her research covers dividend policy, capital structure, executive compensation, corporate governance, and real options. Prior to joining Cornerstone Research, Dr. Bulan held a joint appointment at Brandeis University, where she served as an assistant professor of finance in the International Business School and also in the economics department.

Eric Tam

Principal, Cornerstone Research

Eric Tam specializes in securities litigation. Mr. Tam has more than 20 years of experience consulting to clients and addressing financial economics issues and class actions in federal and state courts, including the Delaware Court of Chancery. His experience spans all stages of the litigation process, including exposure analysis, class certification, expert support, summary judgment filings, mediation and settlement analysis, trial preparation, and regulatory proceedings.

Mr. Tam has extensive expertise with securities litigation involving alleged misrepresentations under Section 10(b) of the Exchange Act and Sections 11 and 12 of the Securities Act. He also addresses allegations of market manipulation under Sections 9 and 10(b) of the Exchange Act and claims under Section 14(a) of the Exchange Act.

Mr. Tam has analyzed class certification issues (market efficiency, price impact, and evaluation of damages methodologies in the context of *Comcast* standards), as well as loss causation, damages, and materiality in numerous securities class actions.

The views expressed herein are solely those of the authors and do not necessarily represent the views of Cornerstone Research.



CORNERSTONE RESEARCH

Economic and Financial Consulting and Expert Testimony

The authors request that you reference Cornerstone Research in any reprint of the information or figures included in this report.

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Cornerstone Research

Cornerstone Research provides economic and financial consulting and expert testimony in all phases of complex disputes and regulatory investigations. The firm works with an extensive network of prominent academics and industry practitioners to identify the best-qualified expert for each assignment. With a reputation for high quality and effectiveness, Cornerstone Research has consistently delivered rigorous, state-of-the-art analysis since 1989. The firm has more than 1,000 professionals in nine offices across the United States, UK, and EU.

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Exhibit 3

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*Counsel for Lead Plaintiff Oklahoma
Firefighters Pension and Retirement System
and Lead Counsel for the Settlement Class*

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

GLAZING EMPLOYERS AND GLAZIERS'
UNION LOCAL #27 PENSION AND
RETIREMENT FUND, on behalf of itself and
all others similarly situated,
Plaintiff,
v.
IRHYTHM TECHNOLOGIES, INC., et al.,
Defendants.

Case No. 3:24-cv-706-JSC

**DECLARATION OF SARAH EVANS
CONCERNING: (A) MAILING /
EMAILING OF THE NOTICE AND
CLAIM FORM; (B) PUBLICATION
OF THE SUMMARY NOTICE; AND
(C) REPORT ON REQUESTS FOR
EXCLUSION RECEIVED TO DATE**

CLASS ACTION

Date: November 5, 2026
Time: 10:00 a.m.
Judge: Hon. Jacqueline Scott Corley

1 I, Sarah Evans, declare as follows:

2 1. I am a Project Manager at Strategic Claims Services (“SCS”), a nationally recognized
3 class action administration firm. Pursuant to the Court’s Order re: Motion for Preliminary Approval,
4 dated July 13, 2026 (the “Preliminary Approval Order”) (Dkt. No. 156), SCS was approved as the
5 Settlement Administrator to supervise and administer the notice procedure and the processing of
6 claims in connection with the Settlement of the above-captioned Action.¹ I have personal knowledge
7 of the facts set forth herein, and if called on to do so, I could and would testify competently thereto.

8 2. I submit this declaration in order to provide the Court and the Parties with information
9 regarding: (i) dissemination of the Notice of (I) Pendency of Class Action and Proposed Settlement;
10 (II) Settlement Hearing; and (III) Motion for Attorneys’ Fees and Litigation Expenses (the “Notice”)
11 and Proof of Claim and Release Form (the “Claim Form”) (collectively, the “Notice Packet”);
12 (ii) publication of the Summary Notice of (I) Pendency of Class Action and Proposed Settlement;
13 (II) Settlement Hearing; and (III) Motion for Attorneys’ Fees and Litigation Expenses (“Summary
14 Notice”), (iii) establishment of the website and toll-free telephone number dedicated to this Settlement;
15 and (iv) requests for exclusion from the Settlement Class received to date by SCS.

16 **DISSEMINATION OF NOTICE PACKET**

17 3. Pursuant to the Preliminary Approval Order, SCS was responsible for disseminating
18 the Notice Packet to potential Settlement Class Members. A copy of the Notice Packet is attached
19 hereto as Exhibit A.

20 4. In connection with the initiation of the notice program, SCS established a settlement
21 database for this administration (the “Settlement Database”). The Settlement Database keeps a record
22 of each person or entity who is sent a copy of the Notice Packet by SCS.

23 5. On July 21, 2026, Lead Counsel emailed to SCS a data file provided by Defendants’
24 Counsel containing a list of 25 unique names and addresses of potential Settlement Class Members.

25
26 ¹ All capitalized terms used herein which are not otherwise defined shall have the meanings provided
27 in the Stipulation and Agreement of Settlement, dated as of June 3, 2026 (the “Stipulation”) (Dkt. No.
147-1).

1 The data file was loaded into the Settlement Database, and on July 28, 2026, SCS caused the Notice
2 Packet to be sent by first-class mail to the 25 potential Settlement Class Members identified in the data
3 file.²

4 6. As in most class actions of this nature, a large majority of potential Settlement Class
5 Members are expected to be beneficial purchasers whose securities are held in “street name” — *i.e.*,
6 the securities are purchased by brokerage firms, banks, and other institutions (referred to as
7 “nominees” or “record holders”) in the name of the nominee, on behalf of the beneficial purchasers.
8 SCS maintains a proprietary database with names and addresses of the largest and most common
9 nominees that purchase securities on behalf of beneficial owners (the “Nominee Database”). At the
10 time of the initial mailing, SCS’s Nominee Database contained 2,433 records. On July 28, 2026, SCS
11 caused a Notice Packet to be sent by first-class mail to each of the 2,433 mailing records contained in
12 its Nominee Database and emailed 180 brokers where email addresses were available.

13 7. In total, 2,458 Notice Packets were disseminated to potential Settlement Class
14 Members and nominees on July 28, 2026.

15 8. The Notice directed those who purchased or acquired iRhythm Technologies, Inc.
16 (“iRhythm”) common stock during the period from July 25, 2022 through August 9, 2024, inclusive,
17 for the beneficial interest of another person or organization, to either: (i) request copies of the Notice
18 Packet and the link to the electronic Notice Packet from the Claims Administrator and, within seven
19 (7) calendar days of receipt of those Notice Packets and link to the electronic Notice Packet, both mail
20 the Notice Packet to all beneficial purchasers/owners for whom they are nominee or custodian at the
21 beneficial purchasers’/owners’ last known addresses, as well as email the link to the electronic Notice
22 Packet to all beneficial purchasers/owners for whom they had email addresses; or (ii) provide SCS
23 with lists of the names, last known addresses, and email addresses (to the extent known) of such
24 beneficial owners, in which event SCS could promptly mail the Notice Packet and email the link to
25 the electronic Notice Packet to such beneficial owners.

26 ² SCS also sent emails providing access to the Notice Packet to 15 potential Settlement Class Members
27 for which both an email address and mailing address were listed in the data file.

1 9. On July 28, 2026, SCS also provided a copy of the Notice Packet to the Depository
2 Trust Company (“DTC”) for posting on its Legal Notice System (“LENS”). The LENS may be
3 accessed by any nominee that is a participant in DTC’s security system.

4 10. Through August 20, 2026, SCS mailed an additional 10,507 Notice Packets to potential
5 Settlement Class Members whose names and mailing addresses were received from individuals or
6 nominees requesting that Notice Packets be mailed to such persons and entities.³ SCS has also mailed
7 70,035 Notice Packets in bulk to a nominee who requested Notice Packets to forward directly to their
8 customers, and SCS received a notification from a nominee that they mailed the Notice Packet to one
9 of their clients. Additionally, SCS emailed the link to the electronic Notice Packet to one email address
10 received for a potential Settlement Class Member for whom SCS was not provided with a mailing
11 address.

12 11. Through August 20, 2026, a total of 83,002 Notice Packets have been disseminated to
13 potential Settlement Class Members and nominees.

14 **PUBLICATION OF THE SUMMARY NOTICE**

15 12. Pursuant to the Preliminary Approval Order, the Summary Notice was transmitted over
16 PR Newswire and published in *The Wall Street Journal* on August 6, 2026, as shown in the
17 confirmations of publication attached hereto as Exhibit B.

18 **TELEPHONE HELPLINE**

19 13. On July 24, 2026, SCS established a case-specific, toll-free telephone helpline (1-866-
20 457-5539) with an interactive voice response system and live operators, to accommodate potential
21 Settlement Class Members with questions about the Action and the Settlement. The automated
22 attendant answers the calls and presents callers with a series of choices to respond to basic questions.
23 Callers requiring further help have the option to be transferred to a live operator during business hours.

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25 ³ Of the 10,507 potential Settlement Class Members for whom SCS received names and addresses,
26 SCS received valid email addresses for 3,868; these 3,868 potential Settlement Class Members were
27 emailed the link to the electronic Notice Packet in addition to being mailed the Notice Packet. SCS
was also notified by a nominee that it emailed the to the electronic Notice Packet to 17,611 of its
customers.

SCS continues to maintain the telephone helpline and will update the interactive voice response system as necessary through the administration of the Settlement.

SETTLEMENT WEBSITE

14. On July 28, 2026, SCS established the case-specific website for the Settlement at www.iRhythmSecuritiesLitigation.com ("Settlement Website"). The address of the Settlement Website was included in the Notice Packet sent to potential Settlement Class Members and in the published Summary Notice. The Settlement Website includes information about the Action and proposed Settlement, including an overview of the Action; the deadlines for submitting claims, submitting requests for exclusion, and filing objections; and downloadable copies of the Notice, Claim Form, the Preliminary Approval Order, the Stipulation, Lead Plaintiff's Unopposed Motion for Preliminary Approval of Settlement (Dkt. No. 147), the Order Re: Defendants' Motion to Dismiss (Dkt. No. 77), and the Second Amended Class Action Complaint for Violations of Federal Securities Laws (Dkt. No. 43). The Settlement Website also contains a secure online filing portal that Settlement Class Members can use to submit their claims electronically and receive an email confirmation once their claim has been submitted. The Settlement Website is accessible 24 hours a day, 7 days a week. SCS will continue to maintain and update the Settlement Website as necessary throughout the administration of the Settlement.

REPORT ON EXCLUSION REQUESTS

15. The Notice, Summary Notice, and Settlement Website informed Settlement Class Members that written requests for exclusion are to be mailed or delivered to SCS at iRhythm Securities Litigation, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063, such that they are received no later than October 1, 2026. SCS has been monitoring all mail delivered for this case. As of the date of this declaration, SCS has not received any requests for exclusion.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day
2 of August 2026 in Media, Pennsylvania.

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Sarah Evans
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GLAZING EMPLOYERS AND GLAZIERS'
UNION LOCAL #27 PENSION AND
RETIREMENT FUND, on behalf of itself and all
others similarly situated,

Plaintiff,

v.

IRHYTHM TECHNOLOGIES, INC., et al.,

Defendants.

Case No. 3:24-cv-706-JSC

CLASS ACTION

Judge: Honorable Jacqueline Scott Corley

**NOTICE OF (I) PENDENCY OF CLASS ACTION
AND PROPOSED SETTLEMENT; (II) SETTLEMENT HEARING; AND
(III) MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

NOTICE OF PENDENCY OF CLASS ACTION: Please be advised that your rights will be affected by the above-captioned securities class action ("Action") if you purchased or acquired the common stock of iRhythm Technologies, Inc ("iRhythm" or the "Company") during the period from **July 25, 2022 through August 9, 2024**, inclusive ("Class Period"), and were allegedly damaged thereby ("Settlement Class").¹

NOTICE OF PROPOSED SETTLEMENT: Please also be advised that the Court-appointed Lead Plaintiff Oklahoma Firefighters Pension and Retirement System ("Lead Plaintiff"), on behalf of itself and the Settlement Class, has reached a proposed settlement of the Action for **\$45,000,000** in cash ("Settlement").

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

1. **Description of the Action and the Settlement Class:** This Notice relates to a proposed Settlement of claims in a pending securities class action brought by Lead Plaintiff, on behalf of itself and other members of the Settlement Class, against iRhythm and its Chief Executive Officer, Quentin Blackford ("Defendants"). In the Action, Lead Plaintiff asserts civil federal securities law claims arising from purportedly materially false and misleading statements to investors during the Class Period concerning iRhythm's Zio AT heart monitoring device, including its data transmission capabilities, appropriateness for high-risk patients, and the accuracy of data reported by the device. A more detailed description of the Action is set forth in ¶¶ 11-23 below. Defendants expressly have denied and continue to deny all claims and allegations of wrongdoing asserted against them in the Action. Nothing in this Notice is intended to, and should not be construed as, an admission of wrongdoing, a determination of liability, or a statement regarding the merits of the case, nor does it reflect any factual findings or conclusions by the Parties or the Court. The proposed Settlement, if approved by the Court, will settle claims of the Settlement Class, as defined in ¶ 31 below.

¹ All capitalized terms not defined in this Notice have the meanings provided in the Stipulation and Agreement of Settlement dated June 3, 2026 ("Stipulation"). The Stipulation can be viewed at www.iRhythmSecuritiesLitigation.com.

2. **Statement of the Settlement Class's Recovery:** Subject to Court approval, Lead Plaintiff, on behalf of the Settlement Class, has agreed to settle the Action in exchange for a cash payment of \$45,000,000 ("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, (d) any attorneys' fees awarded by the Court, and (e) any other costs or fees approved by the Court) will be distributed to eligible Settlement Class Members in accordance with a plan of allocation approved by the Court. The plan of allocation being proposed by Lead Plaintiff ("Plan of Allocation") is attached hereto as Appendix A.
3. **Estimate of Average Amount of Recovery Per Share:** Based on Lead Plaintiff's damages consultant's estimate of the number of shares of iRhythm common stock eligible to participate in the Settlement, and assuming that all investors eligible to participate do so, the estimated average recovery (before deduction of any Court-approved fees and expenses, such as attorneys' fees and expenses, taxes, and administration costs) will be approximately \$1.83 per eligible share. **Settlement Class Members should note, however, that the foregoing is only an estimate.** Some Settlement Class Members may recover more or less than this estimated amount depending on, among other factors, when and at what prices they purchased or sold their iRhythm common stock, and the total number and value of valid Claim Forms submitted. Distributions to Settlement Class Members will be made based on the Plan of Allocation set forth in Appendix A or such other plan of allocation as may be ordered by the Court. *Note: no distribution will be made to Settlement Class Members who would otherwise receive a distribution of less than \$10.00.*
4. **Average Amount of Damages Per Share:** The Parties do not agree on the average amount of damages per share of iRhythm common stock that would be recoverable if Lead Plaintiff prevailed in the Action. Among other things, Defendants do not agree with the assertion that they violated the federal civil securities laws or that any damages were suffered by any members of the Settlement Class as a result of Defendants' conduct.
5. **Attorneys' Fees and Expenses Sought:** Court-appointed Lead Counsel, Bernstein Litowitz Berger & Grossmann LLP, has prosecuted this Action on a wholly contingent basis and has not received any attorneys' fees (or payment of expenses) for its representation of the Settlement Class. For its efforts, Lead Counsel will apply to the Court for attorneys' fees in an amount not to exceed 25% of the Settlement Fund (*i.e.*, \$11.25 million). Lead Counsel will also apply for payment of Litigation Expenses incurred in connection with the institution, prosecution, and resolution of the Action, in an amount not to exceed \$800,000, which amount may include a request for reimbursement of the reasonable costs and expenses incurred by Lead Plaintiff directly related to its representation of the Settlement Class pursuant to 15 U.S.C. §78u-4(a)(4), in an amount not to exceed \$10,000. If the Court approves the maximum amount of the foregoing fees and expenses, the estimated average cost per eligible share of iRhythm common stock will be approximately \$0.49 per share. Please note that this amount is only an estimate.
6. **Identification of Attorneys' Representatives:** Lead Plaintiff and the Settlement Class are represented by Katherine M. Sinderson of Bernstein Litowitz Berger & Grossmann LLP, 1251 Avenue of the Americas, New York, NY 10020, 1-800-380-8496, settlements@blbglaw.com.
7. **Reasons for the Settlement:** For Lead Plaintiff, the principal reason for the Settlement is the guaranteed cash benefit for the Settlement Class without the risk, delays, and increased costs inherent in further litigation. Moreover, the cash benefit provided under the Settlement must be considered against the risk that a smaller recovery—or indeed no recovery at all—might be achieved after further litigation, including summary judgment, trial, and possible appeals. Defendants, who deny all allegations of

wrongdoing or liability whatsoever and deny that Settlement Class Members were damaged, are entering into the Settlement solely to eliminate the burden, expense, and uncertainty of further litigation.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT	
SUBMIT A CLAIM FORM POSTMARKED (IF MAILED), OR ONLINE, NO LATER THAN OCTOBER 1, 2026.	This is the only way to be eligible to receive a payment from the Settlement. If you are a Settlement Class Member and you remain in the Settlement Class, you will be bound by the Settlement as approved by the Court and you will give up any Released Plaintiff's Claims (defined in ¶ 36 below) that you have against Defendants and the other Defendants' Releasees (defined in ¶ 37 below), so it is in your interest to submit a Claim Form. In short, if you remain a Settlement Class Member, you will release all claims related to this Action, as detailed in ¶ 36 below.
EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS BY SUBMITTING A WRITTEN REQUEST FOR EXCLUSION SO THAT IT IS <i>RECEIVED</i> NO LATER THAN OCTOBER 1, 2026.	If you exclude yourself from the Settlement Class, you will not be eligible to 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 Defendants' Releasees concerning the Released Plaintiff's Claims.
OBJECT TO THE SETTLEMENT BY SUBMITTING A WRITTEN OBJECTION SO THAT IT IS <i>FILED</i> OR <i>POSTMARKED</i> NO LATER THAN OCTOBER 1, 2026.	If you do not like the proposed Settlement, the proposed Plan of Allocation, or the request for attorneys' fees and 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.
ATTEND A HEARING ON NOVEMBER 5, 2026 AT 9:00 A.M. PACIFIC TIME	Filing a written objection and notice of intention to appear by October 1, 2026 allows you to speak in Court, at the discretion of the Court, about the fairness of the proposed Settlement, the Plan of Allocation, and/or the request for attorneys' fees and Litigation Expenses. If you submit a written objection, you may (but you do not have to) attend the hearing and, at the discretion of the Court, speak to the Court about your objection.
DO NOTHING.	If you are a member of the Settlement Class and you do not submit a valid Claim Form, you will not be eligible to receive any payment from the Settlement Fund. You will, however, remain a member of the Settlement Class, which means that you give up your right to sue about the claims that are resolved by the Settlement and you will be bound by any judgments or orders entered by the Court in the Action. In short, if you remain a Settlement Class Member and do not submit a valid Claim Form, you will still release all claims related to this Action, as detailed in ¶ 36 below.

These rights and options—and the deadlines to exercise them—are further explained in this Notice. Please Note: The date and time of the Settlement Hearing, currently scheduled for November 5, 2026 at 9:00 a.m. Pacific time by Zoom videoconference, is subject to change without further written notice to the Settlement Class. If you plan to attend the hearing, you should check www.iRhythmSecuritiesLitigation.com or with Lead Counsel to confirm no change to the date and/or time of the hearing has been made. Information about how to attend the Zoom videoconference will be posted on www.iRhythmSecuritiesLitigation.com.

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WHY DID I GET THIS NOTICE?

8. The Court directed that this 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 iRhythm common stock during the Class Period. The Court has directed us to send you this Notice 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 selected by Lead Plaintiff and approved by the Court will make payments pursuant to the Settlement after any objections and appeals are resolved.

9. 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. It is also being sent to inform you of the terms of the proposed Settlement and of a hearing to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement, the proposed Plan of

Allocation, and the motion by Lead Counsel for an award of attorneys' fees and payment of Litigation Expenses (the "Settlement Hearing"). See ¶¶ 58-59 below for details about the Settlement Hearing, including the date and location of the hearing.

10. 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?

11. iRhythm is a digital healthcare company that, during the Class Period, manufactured two heart monitoring devices designed to diagnose and monitor arrhythmia, the Zio XT and Zio AT. The Company maintains its headquarters in San Francisco, California. During the Class Period, iRhythm's common stock traded on NASDAQ under the ticker symbol "IRTC."

12. On February 6, 2024, a putative class action was brought in the United States District Court for the Northern District of California (the "Court"), against iRhythm and certain of its executives, alleging violations of the Securities Exchange Act of 1934 (the "Exchange Act").

13. On May 15, 2024, the Court appointed Oklahoma Firefighters Pension and Retirement System as Lead Plaintiff for the Action and approved Bernstein Litowitz Berger & Grossmann LLP as Lead Counsel under the Private Securities Litigation Reform Act ("PSLRA"), 15 U.S.C. § 78u-4.

14. On October 11, 2024, Lead Plaintiff filed the Second Amended Class Action Complaint for Violations of the Federal Securities Laws (the "Complaint"). The Complaint asserted claims on behalf of all persons and entities who purchased the common stock of iRhythm from November 5, 2021 through August 9, 2024, and were damaged thereby. The Complaint alleged that Defendants iRhythm and Blackford and the Former Individual Defendants² made materially false and misleading statements or omissions concerning iRhythm's Zio AT heart monitoring device, including its purported near real-time data transmission capabilities, its appropriateness for high-risk patients, and the accuracy of data reported by the device. The Complaint asserted (i) claims under Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and SEC Rule 10b-5, 17 C.F.R. § 240.10b-5, promulgated thereunder, against all Defendants and the Former Individual Defendants and (ii) claims under Section 20(a) of the Exchange Act, 15 U.S.C. § 78t(a) against Blackford and the Former Individual Defendants.

15. On December 10, 2024, Defendants and the Former Individual Defendants moved to dismiss the Complaint, asserting (among other things) that Lead Plaintiff failed to sufficiently allege: (i) any actionable misrepresentation or (ii) that defendants acted with scienter in making any alleged misrepresentation. The motion was fully briefed and the Court held oral argument on the motion to dismiss the Complaint on April 24, 2025.

16. On June 3, 2025, the Court granted in part and denied in part the motion to dismiss the Complaint. The Court sustained Lead Plaintiff's Section 10(b) claims against iRhythm and Blackford with respect to statements regarding the Zio AT's timeliness, accuracy, and appropriateness for high-risk patients, but dismissed claims against the Former Individual Defendants, dismissed claims regarding the Zio AT's

² The Former Individual Defendants are additional iRhythm executives: Brice Bobzien, Douglas Devine, Chad Patterson, Mark Day, and Mintu Turakhia.

characterization as a mobile cardiac telemetry device, and dismissed all claims for statements prior to July 25, 2022.

17. On July 18, 2025, Defendants filed a motion for judgment on the pleadings. The motion was fully briefed, and, on November 7, 2025, the Court denied the motion.

18. On November 3, 2025, Lead Plaintiff moved for class certification. The motion was fully briefed, and, on February 26, 2026, the Court held a hearing on Lead Plaintiff's motion for class certification.

19. Discovery in the Action commenced following the Court's June 3, 2025 partial denial of Defendants' motion to dismiss the Complaint. Through the class certification stage of the litigation, the Parties engaged in discovery, producing over 405,000 pages of documents and conducting seven depositions in total. Lead Plaintiff and Defendants also issued subpoenas to produce documents from several non-parties.

20. The Parties began exploring the possibility of a settlement in early 2026. The Parties agreed to engage in private mediation and retained David Murphy of Phillips ADR Enterprises to act as mediator in the Action. Counsel for the Parties participated in a mediation session before Mr. Murphy on April 2, 2026. In advance of that session, the Parties exchanged and submitted detailed mediation statements to Mr. Murphy.

21. In the weeks following the mediation, Mr. Murphy made a mediator's recommendation that the Parties settle the Action for \$45,000,000, which the Parties accepted. The agreement's terms were memorialized in a term sheet executed on May 13, 2026.

22. After additional negotiations regarding the specific terms of their agreement, the Parties entered into the Stipulation on June 3, 2026. The Stipulation, which sets forth the terms and conditions of the Settlement, can be viewed at www.iRhythmSecuritiesLitigation.com.

23. On July 13, 2026, the Court preliminarily approved the Settlement, authorized notice of the Settlement to be provided to potential Settlement Class Members, and scheduled the Settlement Hearing to consider whether to grant final approval of the Settlement.

WHY IS THIS CASE A CLASS ACTION?

24. In a class action, one or more persons or entities (in this case, Lead Plaintiff) sue on behalf of persons and entities that have similar claims. Together, these persons and entities are a "class," and each is a "class member." Bringing a case, such as this one, as a class action allows the adjudication of many individuals' similar claims that might be too small to bring economically as separate actions. One court resolves the issues for all class members at the same time, except for those who exclude themselves, or "opt out," from the class.

WHY IS THERE A SETTLEMENT?

25. Lead Plaintiff and Lead Counsel believe that Lead Plaintiff's claims against Defendants have merit. They recognize, however, the expense and length of continued proceedings necessary to pursue Lead Plaintiff's claims, through the conclusion of complex merits and expert discovery, resolution of Lead Plaintiff's pending motion for class certification, an expected motion for summary judgment, and trial. To defeat summary judgment and prevail at trial, Lead Plaintiff would have been required to prove that Defendants' statements were materially false; that Defendants knew that their statements were false when made or were deliberately reckless in making the statements; and that the disclosures concerning Defendants' false and misleading statements caused declines in the price of iRhythm's stock.

26. Defendants would have had substantial arguments to make concerning each of these issues. For example, Defendants have argued that investors cannot have been misled by Defendants' statements about the Zio AT because the device's transmission limits were publicly disclosed no later than November 2022, and that prescribing physicians understood the Zio AT's technical limitations. While Lead Plaintiff believed that it had responses to these challenges, they presented significant risks at future stages of the litigation. Lead Plaintiff also faced risks that the Court or jury might find that Defendant Blackford lacked scienter on a complete record at summary judgment or trial.

27. Lead Plaintiff faced further significant risks related to proving loss causation and damages. Specifically, there was a material risk that the Court might eliminate statements concerning the accuracy of the Zio AT as they could be read as generic or aspirational and thus, may not have impacted the price of iRhythm's stock. In addition, there was a material risk that the Court might eliminate from recovery one or more of the alleged corrective disclosures at class certification, summary judgment, or trial. If the Court were to have eliminated certain corrective disclosures at any stage of the litigation, the maximum recoverable damages would have been reduced substantially. There was also a risk that the Court or a jury would find that significant portions of the stock price declines on the alleged corrective disclosure dates were due to factors unrelated to the alleged fraud—such as revised revenue guidance, industry-wide regulatory concerns, and non-fraud related information disclosed concurrently. Accordingly, the need to “disaggregate” fraud-related damages from the overall stock price declines on the corrective disclosure dates was likely to materially lower the amounts of potential recovery in this case.

28. Moreover, in order to obtain recovery, Lead Plaintiff would have to prevail at several stages—on the pending motion for class certification, at summary judgment, at trial, and on appeal. Thus, there were significant risks attendant to the continued prosecution of the Action, and there was no guarantee that further litigation would have resulted in a higher recovery, or any recovery at all. In light of these risks, Lead Plaintiff believes that the proposed \$45,000,000 Settlement is fair, reasonable, and adequate, and in the best interests of the Settlement Class.

29. Defendants have denied and continue to deny each and all of the claims asserted against them in the Action, and expressly deny any and all allegations of fault, liability, wrongdoing, or damages whatsoever in connection with the Action, including, but not limited to, any allegations that Defendants have committed any violations of the federal securities laws or any other law, that Defendants have acted improperly in any way, or that Defendants have any liability or owe any damages of any kind to Lead Plaintiff or the Settlement Class. Defendants have agreed to the Settlement solely to eliminate the burden, expense, and uncertainty of continued litigation. Accordingly, the Settlement may not be construed as, and is not, an admission of any wrongdoing by any Defendant.

WHAT MIGHT HAPPEN IF THERE WERE NO SETTLEMENT?

30. If there were no Settlement and Lead Plaintiff failed to establish any essential legal or factual element of its claims against Defendants, neither Lead Plaintiff nor the other members of the Settlement Class would recover anything from Defendants. 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 DO I KNOW IF I AM AFFECTED BY THE SETTLEMENT? WHO IS INCLUDED IN THE SETTLEMENT CLASS?

31. 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 who purchased or acquired iRhythm common stock during the period from July 25, 2022 through August 9, 2024, inclusive, and were allegedly damaged thereby.

Excluded from the Settlement Class are: (i) Defendants; (ii) members of the Immediate Families of Quentin Blackford or any Former Individual Defendant; (iii) any person who was an Officer or director of iRhythm (including the Former Individual Defendants) during the Class Period; (iv) any firm, trust, corporation, or other entity in which any person or entity excluded in subsections (i)–(iii) has or had a controlling interest; (v) iRhythm’s employee retirement and benefit plan(s), if any, and their participants or beneficiaries, to the extent they made purchases through such plan(s); and (vi) the legal representatives, heirs, successors, or assigns of any such excluded persons and entities, in their capacities as such. 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. *See* “What If I Do Not Want To Be A Member Of The Settlement Class? How Do I Exclude Myself,” on page 11 below.

PLEASE NOTE: Receipt of this Notice does not mean that you are a Settlement Class Member or that you will be entitled to a payment from the Settlement. If you are a Settlement Class Member and you wish to be eligible to receive a payment from the Settlement, you are required to submit a Claim Form and the required supporting documentation as set forth in the Claim Form postmarked (if mailed), or online at www.iRhythmSecuritiesLitigation.com, no later than October 1, 2026.

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

32. As a Settlement Class Member, you are represented by Lead Plaintiff and Lead Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

33. 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 below entitled, “What If I Do Not Want To Be A Member Of The Settlement Class? How Do I Exclude Myself?” on page 11.

34. If you are a Settlement Class Member and you wish to object to the Settlement, the Plan of Allocation, or Lead Counsel’s request for attorneys’ fees and Litigation Expenses, you may present your objections by following the instructions in the section below entitled, “When And Where Will The Court Decide Whether To Approve The Settlement?” on page 12.

35. 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 in the Action. If the Settlement is approved, the Court will enter a judgment (“Judgment”). The Judgment will dismiss with prejudice the claims against Defendants and will provide that, upon the Effective Date of the Settlement, Lead Plaintiff and each of the other Settlement Class Members, on behalf of themselves, and their respective heirs, executors, administrators, predecessors, successors, and assigns, in their capacities as such, 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 Plaintiff’s Claim (as defined in ¶ 36 below) against Defendants and the other Defendants’ Releasees (as defined in ¶ 37 below), and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiff’s Claims against any of the Defendants’ Releasees. *In short, if you are a Settlement Class Member and do not exclude yourself from the Settlement Class, you will be releasing all claims you have related to this Action, as specified in ¶ 36 below.*

36. “Released Plaintiff’s Claims” means any and all claims and causes of action of every nature and description, including known claims and Unknown Claims, contingent or absolute, mature or not mature,

liquidated or unliquidated, accrued or not accrued, concealed or hidden, regardless of legal or equitable theory and whether arising under federal, state, common, or foreign law or any other law, rule, or regulation, whether foreign or domestic, that Lead Plaintiff or any other member of the Settlement Class (i) asserted in the Action; or (ii) could have asserted in the Action, or in any other action or in any other forum, that arise out of, are based upon, are related to, or are in consequence of both (a) the allegations, transactions, facts, matters or occurrences, representations, omissions, disclosures, non-disclosures, matters that would have been barred by *res judicata* had the Action been fully litigated to a final judgment, or failures to act that were involved, set forth, or referred to in the complaints filed in the Action; and (b) the purchase or acquisition of iRhythm common stock during the Class Period. This release does not cover, include, or release (i) any claims asserted in any related shareholder derivative action; (ii) any claims related to enforcement of the Settlement; or (iii) any claims of any person or entity who or which submits a request for exclusion from the Settlement Class that is accepted by the Court.

37. “Defendants’ Releasees” means Defendants and Former Individual Defendants and their respective current and former parents, affiliates, subsidiaries, officers, directors, agents, successors, predecessors, assigns, assignees, partnerships, general or limited partners, principals, trustees, trusts, employees, Immediate Family members, insurers, claims administrators, reinsurers, heirs, executors, administrators, attorneys, controlling shareholders, advisors (including financial or investment advisors), accountants, auditors, consultants, underwriters, investment bankers, commercial bankers, limited liability companies, joint ventures, and legal representatives, in their capacities as such, as well as any trust of which any Defendants’ Releasee is the settlor or which is for the benefit of any of their Immediate Family members.

38. “Unknown Claims” means any and all Released Plaintiff’s Claims which Lead Plaintiff or any Settlement Class Member does not know or suspect to exist in his, her, or its favor at the time of the release of such claims, which, if known by him, her, or it, might have affected his, her, or its decision(s) with respect to this Settlement. With respect to any and all Released Claims, the Parties stipulate and agree that, upon the Effective Date of the Settlement, Lead Plaintiff shall expressly waive, and each of the other Settlement Class Members shall be deemed to have waived, and by operation of the Judgment or the Alternate Judgment, if applicable, shall have expressly waived, any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law or foreign law, which is similar, comparable, or equivalent to California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

Lead Plaintiff, other Settlement Class Members, or Defendants may hereafter discover facts, legal theories, or authorities in addition to or different from those which any of them now knows or believes to be true with respect to the Action, the Released Plaintiff’s Claims or the Released Defendants’ Claims, but Lead Plaintiff and Defendants shall expressly, fully, finally, and forever settle and release, and each Settlement Class Member shall be deemed to have fully, finally, and forever settled and released, and upon the Effective Date and by operation of the Judgment or Alternative Judgment shall have settled and released, fully, finally, and forever, any and all Released Plaintiff’s Claims and Released Defendants’ Claims as applicable, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. Lead Plaintiff acknowledges, and each of the other Settlement Class Members shall be deemed by operation of law to have acknowledged, that the foregoing waiver was separately bargained for and a material, key element of the Settlement.

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

39. To be eligible for a payment from the Settlement, you must be a member of the Settlement Class and you must timely complete and return a Claim Form to the Claims Administrator with adequate supporting documentation *postmarked (if mailed), or submitted online at www.iRhythmSecuritiesLitigation.com, no later than October 1, 2026*. A Claim Form is included with this Notice, or you may obtain a copy from the website maintained by the Claims Administrator for the Settlement, www.iRhythmSecuritiesLitigation.com, or you may request that a Claim Form be mailed to you by calling the Claims Administrator toll-free at 1-866-457-5539, or by emailing the Claims Administrator at info@iRhythmSecuritiesLitigation.com. Please retain all records of your ownership of and transactions in iRhythm common stock, as they may be needed to document your Claim. The Parties and Claims Administrator do not have information about your transactions in iRhythm common stock.

40. 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?

41. 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.

42. Pursuant to the Settlement, Defendants shall pay or cause to be paid a total of \$45,000,000 in cash. The Settlement Amount will be deposited into an escrow account. The Settlement Amount plus any interest earned thereon is referred to as the “Settlement Fund.” If the Settlement is approved by the Court and the Effective Date occurs, the “Net Settlement Fund” (that is, the Settlement Fund less: (i) any Taxes; (ii) any Notice and Administration Costs; (iii) any Litigation Expenses awarded by the Court; (iv) any attorneys’ fees awarded by the Court; and (v) any other costs or fees approved by the Court) will be distributed to 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.

43. Approval of the Settlement is independent from approval of a plan of allocation. Any determination with respect to the Plan of Allocation set forth in Appendix A, or another plan of allocation, will not affect the Settlement, if approved.

44. Once the Court’s order or judgment approving the Settlement becomes Final and the Effective Date has occurred, no Defendant, Defendants’ Releasee, or any other person or entity who or which paid any portion of the Settlement Amount on Defendants’ behalf is entitled to get back any portion of the Settlement Fund. Defendants shall not have any liability, obligation, or responsibility for the administration of the Settlement, the disbursement of the Net Settlement Fund, or the Plan of Allocation.

45. Unless the Court otherwise orders, any Settlement Class Member who fails to submit a Claim Form postmarked or received on or before October 1, 2026 shall be fully and forever barred from receiving payments pursuant to the Settlement but will in all other respects remain a Settlement Class Member and be subject to the provisions of the Stipulation, including the terms of any judgment entered and the Releases given.

46. Participants in, and beneficiaries of, an iRhythm employee benefit plan covered by the Employee Retirement Income Security Act of 1974 (“ERISA Plan”) should NOT include any information relating to their transactions in iRhythm common stock held through the ERISA Plan in any Claim Form that they submit in this Action. They should include ONLY those shares that they purchased or acquired outside of the ERISA Plan.

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

48. Each Claimant shall be deemed to have submitted to the jurisdiction of the Court with respect to his, her, or its Claim.

49. Only Settlement Class Members, *i.e.*, persons and entities who purchased or otherwise acquired iRhythm common stock during the Class Period and were damaged as a result of such purchases or acquisitions, will be eligible to share in the distribution of the Net Settlement Fund. Persons and entities that are excluded from the Settlement Class by definition or that exclude themselves from the Settlement Class pursuant to request will not be eligible to receive a distribution from the Net Settlement Fund and should not submit Claim Forms.

50. **Appendix A to this Notice sets forth the Plan of Allocation for allocating the Net Settlement Fund among Authorized Claimants, as proposed by Lead Plaintiff and Lead Counsel. At the Settlement Hearing, Lead Counsel will request that the Court approve the Plan of Allocation. The Court may modify the Plan of Allocation, or approve a different plan of allocation, without further notice to the Settlement Class.**

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

51. Lead Counsel has not received any payment for its services in pursuing claims against the Defendants on behalf of the Settlement Class, nor has Lead Counsel been reimbursed for its out-of-pocket expenses. Before final approval of the Settlement, Lead Counsel will apply to the Court for an award of attorneys' fees in an amount not to exceed 25% of the Settlement Fund (*i.e.*, \$11.25 million). At the same time, Lead Counsel also intends to apply for payment of Litigation Expenses in an amount not to exceed \$800,000, which amount may include a request for reimbursement of the reasonable costs and expenses incurred by Lead Plaintiff directly related to its representation of the Settlement Class pursuant to 15 U.S.C. §78u-4(a)(4), in an amount not to exceed \$10,000.

52. Lead Counsel's motion for attorneys' fees and Litigation Expenses will be filed by August 20, 2026. A copy of Lead Counsel's motion for attorneys' fees and Litigation Expenses will be available for review at www.iRhythmSecuritiesLitigation.com once it is filed. The Court will determine the amount of any award of attorneys' fees or Litigation Expenses. Such sums as may be 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?**

53. 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 letter requesting exclusion addressed to: *iRhythm Securities Litigation*, EXCLUSIONS, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063. The request for exclusion must be **received no later than October 1, 2026**. You will not be able to exclude yourself from the Settlement Class after that date. Each letter requesting exclusion must: (i) state the name, address, 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 *Glazing Employers and Glaziers' Union Local #27 Pension and Retirement Fund v. iRhythm Technologies, Inc.*, Case No. 3:24-cv-00706-JSC (N.D. Cal.)"; (iii) state the number of shares of iRhythm

common stock that the person or entity requesting exclusion (A) owned as of the opening of trading on July 25, 2022 and (B) purchased/acquired and/or sold during the Class Period (*i.e.*, from July 25, 2022 through August 9, 2024, inclusive), as well as the dates, number of shares, and prices of each such purchase/acquisition and/or sale; and (iv) be signed by the person or entity requesting exclusion or an authorized representative. A letter requesting 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.

54. 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 Plaintiff's Claim against any of the Defendants' Releasees. Excluding yourself from the Settlement Class is the only option that may allow you to be part of any other current or future lawsuit against Defendants or any of the other Defendants' Releasees concerning the Released Plaintiff's Claims. Please note, however, if you decide to exclude yourself from the Settlement Class, Defendants and the other Defendants' Releasees will have the right to assert any and all defenses they may have to any claims that you may seek to assert.

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

56. iRhythm has the right to terminate the Settlement if valid requests for exclusion are received from persons and entities entitled to be members of the Settlement Class in an amount that exceeds an amount agreed to by Lead Plaintiff and iRhythm.

**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?**

57. **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.**

58. **Please Note:** The date and time of the Settlement Hearing may change without further written notice to the Settlement Class. In addition, the Court may decide to change the format of the Settlement Hearing—currently scheduled as a Zoom videoconference—without further written notice to the Settlement Class. **In order to determine whether the date and time of the Settlement Hearing have changed, or whether Settlement Class Members must or may participate by phone or video or in person, it is important that you monitor the Court's docket and the website, www.iRhythmSecuritiesLitigation.com, before making any plans to attend the Settlement Hearing. Any updates regarding the Settlement Hearing, including any changes to the date or time of the hearing or updates regarding in-person or remote appearances at the hearing, will be posted to www.iRhythmSecuritiesLitigation.com. Information for accessing the hearing video conference will be posted to www.iRhythmSecuritiesLitigation.com.**

59. The Settlement Hearing will be held on **November 5, 2026 at 9:00 a.m. Pacific time**, before the Honorable Jacqueline Scott Corley, United States District Court Judge for the Northern District of California, by Zoom videoconference. At the Settlement Hearing, the Court will determine, among other things, (i) whether, for purposes of settlement, the Action should be certified as a class action on behalf of the Settlement Class, Lead Plaintiff should be appointed as the class representative for the Settlement Class, and Lead Counsel should be appointed as class counsel for the Settlement Class; (ii) whether the Settlement on the terms and conditions provided for in the Stipulation is fair, reasonable, and adequate to

the Settlement Class, and should be finally approved by the Court; (iii) whether the Action should be dismissed with prejudice against Defendants and the releases specified and described in the Stipulation (and in this Notice) should be granted; (iv) whether the proposed Plan of Allocation should be approved as fair and reasonable; and (v) whether Lead Counsel's motion for attorneys' fees and Litigation Expenses should be approved. The Court reserves the right to approve the Settlement, the Plan of Allocation, Lead Counsel's request for attorneys' fees and 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 may object to the proposed Settlement, the proposed Plan of Allocation, or Lead Counsel's request for attorneys' fees and Litigation Expenses. You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval of the Settlement, no settlement payments will be sent out and the Action will continue. If that is what you want to happen, then you should object.

61. Any objection to the proposed Settlement must be in writing. If you submit a timely written objection, you may, but are not required to, appear at the Settlement Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must: (a) clearly identify the case name and number (*Glazing Employers and Glaziers' Union Local #27 Pension and Retirement Fund v. iRhythm Technologies, Inc.*, Case No. 3:24-cv-00706-JSC (N.D. Cal.)); (b) be submitted to the Court either by filing them in person at any location of the United States District Court for the Northern District of California or by mailing them to the Class Action Clerk, United States District Court for the Northern District of California, Phillip Burton Federal Building, 450 Golden Gate Avenue, San Francisco, CA 94102; and (c) be filed or postmarked on or before **October 1, 2026**. Objectors represented by counsel may file objections electronically by ECF.

62. Any objection must: (a) identify the name, address, and telephone number of the person or entity objecting and be signed by the objector; (b) state with specificity the grounds for the Settlement Class Member's objection, including any legal and evidentiary support the Settlement Class Member wishes to bring to the Court's attention and whether the objection applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class; and (c) must include documents sufficient to prove membership in the Settlement Class, including the number of shares of iRhythm common stock that the objecting Settlement Class Member (i) owned as of the opening of trading on July 25, 2022 and (ii) purchased/acquired and/or sold during the Class Period (*i.e.*, from July 25, 2022 through August 9, 2024, inclusive), as well as the dates, number of shares, and prices of each such purchase/acquisition and sale. Documentation establishing membership in the Settlement Class may consist of copies of trade confirmations or monthly account statements, or an authorized statement from the objector's broker or financial institution containing the transactional and holding information found in a trade confirmation or account statement. **You may not object to the Settlement, Plan of Allocation, or Lead Counsel's request for attorneys' fees and Litigation Expenses if you exclude yourself from the Settlement Class or if you are not a Settlement Class Member.**

63. If you wish to appear and speak about your objection at the Settlement Hearing, you must state that you intend to appear at the hearing in your objection or send a letter stating that you intend to appear at the Settlement Hearing in *Glazing Employers and Glaziers' Union Local #27 Pension and Retirement Fund v. iRhythm Technologies, Inc.*, Case No. 3:24-cv-00706-JSC (N.D. Cal.) to the Clerk of Court at the address set forth in ¶ 61 above so that it is **filed or postmarked on or before October 1, 2026**. Persons who intend to object and desire to present evidence at the Settlement Hearing must include in their 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. Such persons may be heard orally at the discretion of the Court.

64. **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 request for attorneys' fees and 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 DO NOTHING?

65. If you do nothing, all of your Released Plaintiff's Claims (*see* ¶ 36 above) against Defendants and the other Defendants' Releasees will be released, and you will not receive any payment from the Settlement because it is necessary that you submit a Claim Form in order to be eligible to share in the Settlement proceeds.

WHAT IF I BOUGHT SHARES OF iRHYTHM COMMON STOCK ON SOMEONE ELSE'S BEHALF?

66. If you purchased or otherwise acquired shares of iRhythm common stock from July 25, 2022 through August 9, 2024, inclusive, for the beneficial interest of persons or entities other than yourself, you must either (i) within seven (7) calendar days of receipt of this Notice, request from the Claims Administrator sufficient copies of the Notice and Claim Form (the "Notice Packet") and the link to the electronic Notice Packet to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Notice Packets and links to the electronic Notice Packet forward the Notice Packets to all such beneficial owners for whom you have postal mailing addresses and forward the link to the electronic Notice Packet to all such beneficial owners for whom you have email addresses (if you have both forms of address for the same beneficial owner, send the Notice Packet by both means); or (ii) within seven (7) calendar days of receipt of this Notice, provide a list of the names, addresses, and e-mail addresses, if available, of all such beneficial owners to *iRhythm Securities Litigation*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063. If you choose the second option, the Claims Administrator will send a copy of the Notice Packet to the beneficial owners you have identified. Upon full compliance with these directions, nominees may seek reimbursement of their reasonable expenses actually incurred in complying with these directions by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought. **Brokers, nominees, and their agents shall forward the Notice Packet to (or identify names, mailing addresses, and e-mail addresses of) all beneficial owners who purchased or otherwise acquired iRhythm common stock during the Class Period, regardless of whether or not those beneficial owners have enrolled in a claim-filing program with their broker or financial institution.** Reasonable expenses shall not exceed \$0.05 per mailing record provided to the Claims Administrator; \$0.05 per unit for each Notice Packet actually mailed plus postage at the rate used by the Claims Administrator; and \$0.05 per Notice Packet sent via email. Such properly documented expenses incurred by nominees in compliance with these directions shall be paid from the Settlement Fund, with any disputes as to the reasonableness or documentation of expenses incurred subject to review by the Court.

67. Copies of the Notice and the Claim Form may be obtained from the website for the Settlement, www.iRhythmSecuritiesLitigation.com, by calling the Claims Administrator toll-free at 1-866-457-5539, or by emailing the Claims Administrator at info@iRhythmSecuritiesLitigation.com.

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

68. This Notice contains only a summary of the terms of the proposed Settlement. For the full terms and conditions of the Settlement, please review the Stipulation at www.iRhythmSecuritiesLitigation.com. Copies of any related orders entered by the Court and other Settlement related filings in this Action will also be posted on the website, www.iRhythmSecuritiesLitigation.com.

69. All inquiries concerning this Notice and the Claim Form should be directed to:

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

1-866-457-5539
info@iRhythmSecuritiesLitigation.com
www.iRhythmSecuritiesLitigation.com

Bernstein Litowitz Berger & Grossmann LLP
Katherine M. Sinderson
1251 Avenue of the Americas
New York, NY 10020

1-800-380-8496
www.blbglaw.com

**PLEASE DO NOT CALL OR WRITE THE COURT,
THE COURT'S CLERK'S OFFICE, DEFENDANTS, OR
DEFENDANTS' COUNSEL REGARDING THIS NOTICE.**

DATED: July 28, 2026

BY ORDER OF THE COURT
United States District Court
Northern District of California

APPENDIX A

PLAN OF ALLOCATION OF THE NET SETTLEMENT FUND

70. As discussed above, the Settlement provides \$45 million in cash for the benefit of the Settlement Class. The Settlement Amount and any interest it earns constitute the “Settlement Fund.” The Settlement Fund, after deduction of Court-approved attorneys’ fees and Litigation Expenses, Notice and Administration Costs, Taxes, and any other fees or expenses approved by the Court, is the “Net Settlement Fund.” If the Settlement is approved by the Court, the Net Settlement Fund will be distributed to eligible Authorized Claimants, i.e., Settlement Class Members who timely submit valid Claim Forms that are accepted for payment by the Court, in accordance with a plan of allocation to be adopted by the Court. Settlement Class Members who do not timely submit valid Claim Forms will not share in the Net Settlement Fund, but will otherwise be bound by the Settlement.

71. The Plan of Allocation (the “Plan”) set forth herein is the plan that is being proposed to the Court for approval by Lead Plaintiff after consultation with its damages experts. The Court may approve the Plan with or without modification, or approve another plan of allocation, without further notice to the Settlement Class. Any Orders regarding a modification to the Plan will be posted to www.iRhythmSecuritiesLitigation.com. Defendants have had, and will have, no involvement or responsibility for the terms or application of the Plan.

72. The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund among Authorized Claimants who suffered economic losses as a proximate result of the wrongdoing alleged in the Action. The calculations made pursuant to the Plan of Allocation are not intended to be estimates of, nor indicative of, the amounts that Settlement Class Members might have been able to recover after a trial. Nor are the calculations pursuant to the Plan of Allocation intended to be estimates of the amounts that will be paid to Authorized Claimants pursuant to the Settlement. The computations under the Plan of Allocation are only a method to weigh the claims of Authorized Claimants against one another for the purposes of making pro rata allocations of the Net Settlement Fund.

73. The Plan reflects the assumption that Defendants’ alleged false and misleading statements and material omissions proximately caused the price of iRhythm common stock to be artificially inflated throughout the Class Period. In calculating the estimated artificial inflation, Lead Plaintiff’s damages expert considered the impact of public announcements that Lead Plaintiff believes corrected Defendants’ alleged false and misleading statements and material omissions, reflected in price changes in iRhythm common stock on November 2, 2022 through November 7, 2022, May 5, 2023, May 31, 2023 through June 2, 2023, July 2, 2024³ through July 3, 2024, August 2, 2024, and August 12, 2024, adjusting for price changes attributable to market or industry factors on those days.

74. To determine the daily artificial inflation per share, the applied methodology utilized a constant-dollar inflation. The dollar amount inflation in the price of each share of iRhythm common stock based on this analysis for each trading day in the Class Period is set forth in Table A below.

75. Under the Plan, Recognized Loss Amounts are based primarily on the difference in the amount of alleged artificial inflation in the prices of iRhythm common stock at the time of purchase or acquisition and at the time of sale, or the difference between the actual purchase price and sale price. In order to have a Recognized Loss Amount under the Plan of Allocation, a Settlement Class Member who purchased or otherwise acquired iRhythm common stock during the Class Period must have held those shares through

³ The Second Amended Complaint alleges a stock price decline following the alleged corrective disclosure of the DOJ Filing on July 1, 2024; however, as this filing occurred after hours, the first market impact date is July 2, 2024.

at least the close of trading on November 1, 2022 or, if purchased after that date, through at least one of the subsequent alleged corrective disclosure dates.

CALCULATION OF RECOGNIZED LOSS AMOUNT

76. Based on the formula stated below, a “Recognized Loss Amount” will be calculated for each purchase or acquisition of iRhythm common stock during the Class Period that is listed on the Claim Form and for which adequate documentation is provided. If a Recognized Loss Amount calculates to a negative number or zero under the formula below, that Recognized Loss Amount will be zero.⁴

77. For each share of iRhythm common stock purchased or otherwise acquired during the Class Period (that is, the period from July 25, 2022, through August 9, 2024, inclusive), and:

- A. Sold prior to the close of trading on November 1, 2022, the Recognized Loss Amount will be \$0.00.
- B. Sold from November 2, 2022 through and including the close of trading on August 9, 2024, the Recognized Loss Amount will be *the lesser of*: (i) the amount of artificial inflation on the purchase/acquisition date as stated in Table A below *minus* the amount of artificial inflation on the sale date as stated in Table A below; or (ii) the purchase/acquisition price minus the sale price.
- C. Sold from August 12, 2024, through and including the close of trading on November 8, 2024, the Recognized Loss Amount will be *the least of*: (i) the amount of artificial inflation on the purchase/acquisition date as stated in Table A below; (ii) the purchase/acquisition price minus the average closing price from August 12, 2024 through the date of sale as stated in Table B below; or (iii) the purchase/acquisition price minus the sale price.
- D. Held as of the close of trading on November 8, 2024, the Recognized Loss Amount will be *the lesser of*: (i) the amount of artificial inflation on the purchase/acquisition date as stated in Table A below, or (ii) the purchase/acquisition price *minus* \$70.38.⁵

ADDITIONAL PROVISIONS

78. **Calculation of Claimant’s “Recognized Claim”:** A Claimant’s “Recognized Claim” will be the sum of his, her, or its Recognized Loss Amounts as calculated under ¶ 77 above.

79. **FIFO Matching:** If a Claimant made more than one purchase/acquisition or sale of iRhythm common stock during the Class Period, all purchases/acquisitions and sales will be matched on a First In,

⁴ Any transactions in iRhythm common stock executed outside of regular trading hours for the U.S. financial markets shall be deemed to have occurred during the next regular trading session.

⁵ Pursuant to Section 21D(e)(1) of the Exchange Act, “in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and the mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated to the market.” Consistent with the requirements of the Exchange Act, Recognized Loss Amounts are reduced to an appropriate extent by taking into account the closing prices of iRhythm common stock during the “90-day look-back period” from August 12, 2024 (the first day that U.S. financial markets were open subsequent to the Class Period) through November 8, 2024, inclusive. The mean (average) closing price for iRhythm common stock during this period was \$70.38.

First Out (“FIFO”) basis. Class Period sales will be matched first against any holdings at the beginning of the Class Period and then against purchases/acquisitions in chronological order, beginning with the earliest purchase/acquisition made during the Class Period.

80. **Purchase/Sale Prices:** For the purposes of calculations in ¶ 77 above, “purchase/acquisition price” means the actual price paid, excluding any fees, commissions, and taxes, and “sale price” means the actual amount received, not deducting any fees, commissions, and taxes.

81. **“Purchase/Acquisition/Sale” Dates:** Purchases or acquisitions and sales of iRhythm common stock will 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 iRhythm common stock during the Class Period will not be deemed a purchase, acquisition, or sale of iRhythm common stock for the calculation of a Claimant’s Recognized Loss Amount, nor will the receipt or grant be deemed an assignment of any claim relating to the purchase/acquisition/sale of iRhythm common stock unless (i) the donor or decedent purchased or otherwise acquired or sold such iRhythm common stock during the Class Period; (ii) the instrument of gift or assignment specifically provides that it is intended to transfer such rights; and (iii) no claim was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to shares of iRhythm common stock.

82. **Short Sales:** The date of covering a “short sale” is deemed to be the date of purchase or acquisition of the iRhythm common stock. The date of a “short sale” is deemed to be the date of sale of the iRhythm common stock. In accordance with the Plan of Allocation, however, the Recognized Loss Amount on “short sales” and the purchases covering “short sales” is zero.

83. In the event that a Claimant has an opening short position in iRhythm common stock, the earliest purchases or acquisitions of iRhythm common stock during the Class Period will be matched against such opening short position, and not be entitled to a recovery, until that short position is fully covered.

84. **Common Stock Purchased/Sold Through the Exercise of Options:** Option contracts are not securities eligible to participate in the Settlement. With respect to iRhythm common stock purchased or sold through the exercise of an option, the purchase/sale date of the common stock is the exercise date of the option, and the purchase/sale price is the exercise price of the option.

85. **Market Gains and Losses:** 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 iRhythm common stock during the Class Period. For purposes of making this calculation, the Claims Administrator shall determine the difference between (i) the Claimant’s Total Purchase Amount⁶ and (ii) the sum of the Claimant’s Total Sales Proceeds⁷ and the Claimant’s Holding Value.⁸ If the Claimant’s Total Purchase Amount *minus* the sum of the Claimant’s Total Sales Proceeds and the Claimant’s Holding Value is a

⁶ The “Total Purchase Amount” is the total amount the Claimant paid (excluding all fees, taxes, and commissions) for all shares of iRhythm common stock purchased or acquired during the Class Period.

⁷ The Claims Administrator shall match any sales of iRhythm common stock during the Class Period first against the Claimant’s opening position in iRhythm common stock (the proceeds of those sales will not be considered for purposes of calculating market gains or losses). The total amount received (not deducting any fees, taxes and commissions) for sales of the remaining shares of iRhythm common stock sold during the Class Period is the “Total Sales Proceeds.”

⁸ The Claims Administrator shall ascribe a “Holding Value” of \$64.64 to each share of iRhythm common stock purchased or acquired during the Class Period that was still held as of the close of trading on August 9, 2024.

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.

86. If a Claimant had a Market Gain with respect to his, her, or its overall transactions in iRhythm common stock during the Class Period, the value of the Claimant's Recognized Claim will be zero, and the Claimant will in any event be bound by the Settlement. If a Claimant suffered an overall Market Loss with respect to his, her, or its overall transactions in iRhythm common stock during the Class Period but that Market Loss was less than the Claimant's Recognized Claim, then the Claimant's Recognized Claim will be limited to the amount of the Market Loss.

87. **Determination of Distribution Amount:** The Net Settlement Fund will be distributed to Authorized Claimants on a *pro rata* basis based on the relative size of their Recognized Claims. Specifically, a "Distribution Amount" will be calculated for each Authorized Claimant, which will be the Authorized Claimant's Recognized Claim divided by the total Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Net Settlement Fund.

88. If an Authorized Claimant's Distribution Amount calculates to less than \$10.00, no distribution will be made to that Authorized Claimant. Those funds will be included in the distribution to Authorized Claimants whose Distribution Amount is \$10.00 or more.

89. After the initial distribution of the Net Settlement Fund, the Claims Administrator will make reasonable and diligent efforts to have Authorized Claimants cash their distribution checks. To the extent any monies remain in the Net Settlement Fund six (6) 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 will 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 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, 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 will be contributed to the Bluhm Legal Clinic Complex Civil Litigation and Investor Protection Center at the Northwestern Pritzker School of Law.

90. Payment pursuant to the Plan of Allocation, or such other plan of allocation as may be approved by the Court, will be conclusive against all Claimants. No person shall have any claim against Lead Plaintiff, Lead Counsel, Lead Plaintiff's damages experts, Lead Plaintiff's consulting experts, Defendants, Defendants' Counsel, or any of the other Plaintiff's Releasees or Defendants' Releasees, 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. Lead Plaintiff, Defendants, and their respective counsel, and all other Defendants' Releasees, shall have no responsibility or liability whatsoever for the investment or distribution of the Settlement Fund or the Net Settlement Fund; the Plan of Allocation; the determination, administration, calculation, or payment of any Claim or nonperformance of the Claims Administrator; the payment or withholding of Taxes; or any losses incurred in connection therewith.

TABLE A

**Artificial Inflation in iRhythm Common Stock
July 25, 2022 through August 9, 2024**

Transaction Date	Artificial Inflation Per-Share
July 25, 2022 - November 1, 2022	\$78.83
November 2, 2022	\$78.72
November 3, 2022	\$68.48
November 4, 2022	\$63.23
November 7, 2022 - May 4, 2023	\$60.44
May 5, 2023 - May 30, 2023	\$47.18
May 31, 2023	\$40.09
June 1, 2023	\$33.61
June 2, 2023 - July 1, 2024	\$27.03
July 2, 2024	\$19.22
July 3, 2024 - August 1, 2024	\$16.64
August 2, 2024 - August 9, 2024	\$6.14
August 12, 2024 and later	\$0.00

TABLE B

**90-Day Look-back Table for iRhythm Common Stock
Closing Price and Average Closing Price
August 12, 2024 through November 8, 2024**

Date	Closing Price	Average Closing Price from August 12, 2024 through Date Shown	Date	Closing Price	Average Closing Price from August 12, 2024 through Date Shown
Aug. 12, 2024	\$64.64	\$64.64	Sept. 26, 2024	\$71.63	\$70.04
Aug. 13, 2024	\$66.48	\$65.56	Sept. 27, 2024	\$72.87	\$70.13
Aug. 14, 2024	\$66.49	\$65.87	Sept. 30, 2024	\$74.24	\$70.24
Aug. 15, 2024	\$66.62	\$66.06	Oct. 1, 2024	\$71.58	\$70.28
Aug. 16, 2024	\$65.48	\$65.94	Oct. 2, 2024	\$71.03	\$70.30
Aug. 19, 2024	\$69.68	\$66.56	Oct. 3, 2024	\$66.28	\$70.20
Aug. 20, 2024	\$69.93	\$67.05	Oct. 4, 2024	\$62.71	\$70.00
Aug. 21, 2024	\$70.67	\$67.50	Oct. 7, 2024	\$60.36	\$69.76
Aug. 22, 2024	\$69.84	\$67.76	Oct. 8, 2024	\$60.19	\$69.53
Aug. 23, 2024	\$70.01	\$67.98	Oct. 9, 2024	\$58.67	\$69.27
Aug. 26, 2024	\$69.81	\$68.15	Oct. 10, 2024	\$57.38	\$68.99
Aug. 27, 2024	\$67.95	\$68.13	Oct. 11, 2024	\$57.07	\$68.72
Aug. 28, 2024	\$68.56	\$68.17	Oct. 14, 2024	\$57.94	\$68.48
Aug. 29, 2024	\$72.42	\$68.47	Oct. 15, 2024	\$60.13	\$68.30
Aug. 30, 2024	\$70.88	\$68.63	Oct. 16, 2024	\$61.77	\$68.16
Sept. 3, 2024	\$68.00	\$68.59	Oct. 17, 2024	\$62.49	\$68.04
Sept. 4, 2024	\$68.98	\$68.61	Oct. 18, 2024	\$62.67	\$67.93
Sept. 5, 2024	\$65.21	\$68.43	Oct. 21, 2024	\$62.10	\$67.82
Sept. 6, 2024	\$67.20	\$68.36	Oct. 22, 2024	\$75.59	\$67.97
Sept. 9, 2024	\$69.98	\$68.44	Oct. 23, 2024	\$74.36	\$68.09
Sept. 10, 2024	\$72.41	\$68.63	Oct. 24, 2024	\$78.12	\$68.28
Sept. 11, 2024	\$74.83	\$68.91	Oct. 25, 2024	\$75.68	\$68.42
Sept. 12, 2024	\$74.76	\$69.17	Oct. 28, 2024	\$76.30	\$68.56
Sept. 13, 2024	\$76.61	\$69.48	Oct. 29, 2024	\$77.00	\$68.71
Sept. 16, 2024	\$73.70	\$69.65	Oct. 30, 2024	\$75.77	\$68.84
Sept. 17, 2024	\$71.51	\$69.72	Oct. 31, 2024	\$72.44	\$68.90
Sept. 18, 2024	\$71.03	\$69.77	Nov. 1, 2024	\$75.04	\$69.00
Sept. 19, 2024	\$73.08	\$69.88	Nov. 4, 2024	\$81.44	\$69.21
Sept. 20, 2024	\$70.00	\$69.89	Nov. 5, 2024	\$86.68	\$69.50
Sept. 23, 2024	\$70.05	\$69.89	Nov. 6, 2024	\$89.50	\$69.82
Sept. 24, 2024	\$70.30	\$69.91	Nov. 7, 2024	\$88.76	\$70.12
Sept. 25, 2024	\$72.69	\$69.99	Nov. 8, 2024	\$86.48	\$70.38

iRhythm Securities Litigation
Toll-Free Number: (866) 457-5539
Email: info@iRhythmSecuritiesLitigation.com
Website: www.iRhythmSecuritiesLitigation.com

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 complete and sign this Proof of Claim and Release Form (“Claim Form”) and mail it by First-Class Mail to the address below, or submit it online at www.iRhythmSecuritiesLitigation.com, with supporting documentation, ***postmarked (if mailed) or submitted online no later than October 1, 2026.***

Mail to:

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

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

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

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Need help? If you have questions concerning this Claim Form or need assistance in filling out the Claim Form, you may contact the Claims Administrator at the above mailing address, by email at info@iRhythmSecuritiesLitigation.com, or by toll-free phone at (866) 457-5539, or you can visit the website, www.iRhythmSecuritiesLitigation.com.

PART I – CLAIMANT INFORMATION

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. Complete names of all persons and entities must be provided.

Name of the Beneficial Owner of iRhythm common stock (see ¶ 9 on page 4 for details)

First Name

Last Name

Joint Owner's Name (if applicable)

First Name

Last Name

If this claim is submitted for an IRA, and if you would like any check that you MAY be eligible to receive made payable to the IRA, please include "IRA" in the "Last Name" box above (e.g., Jones IRA).

Entity Name (if the Owner is not an individual)

Name of Representative, if applicable (*executor, administrator, trustee, c/o, etc.*), if different from Owner

Last 4 digits of Social Security Number or Taxpayer Identification Number

Street Address

Street Address (second line, if needed)

City

State/Province Zip Code

Foreign Postal Code (if applicable)

Foreign Country (if applicable)

Telephone Number (Day)

Telephone Number (Evening)

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):

Type of Owner:

Specify one of the following:

☐

Individual(s)

☐

Corporation

☐

UGMA Custodian

☐

IRA

☐

Partnership

☐

Estate

☐

Trust

☐

Other (describe: _____)

PART II – GENERAL INSTRUCTIONS

1. It is important that you completely read and understand the Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys’ Fees and Litigation Expenses (“Notice”), including the proposed Plan of Allocation set forth in the Notice (“Plan of Allocation”). 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. 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 directed to **all persons and entities who purchased or acquired the common stock of iRhythm Technologies, Inc. (“iRhythm”) from July 25, 2022 through August 9, 2024, inclusive (“Class Period”), and were allegedly damaged thereby (“Settlement Class”).** Certain persons and entities are excluded from the Settlement Class by definition as set forth in ¶ 31 of the Notice.
3. By submitting this Claim Form, you are making a request to share in the proceeds of the Settlement described in the Notice. If you are not a Settlement Class Member (see the definition of the Settlement Class in ¶ 31 of the Notice), or if you, or someone acting on your behalf, submitted a request for exclusion from the Settlement Class, 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, any Claim Form that you submit, or that may be submitted on your behalf, will not be accepted.
4. **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 as the Court approves.**
5. Use the Schedule of Transactions in Part III of this Claim Form to supply all required details of your transaction(s) (including free transfers and deliveries) in and holdings of iRhythm common stock. In this Schedule, please provide all of the requested information with respect to your holdings, purchases, acquisitions, and sales of iRhythm common stock, whether such transactions resulted in a profit or a loss. **Failure to report all transaction and holding information during the requested time periods may result in the rejection of your claim.**
6. **Please note:** Only iRhythm common stock purchased or acquired during the Class Period (*i.e.*, the period from July 25, 2022 through August 9, 2024, inclusive) is eligible under the Settlement. However, because the PSLRA provides for a “90-day look-back period” (described in the Plan of Allocation set forth in the Notice), you must provide documentation related to your purchases, acquisitions, and sales of iRhythm common stock during the period from August 10, 2024 through November 8, 2024 (*i.e.*, the 90-day look-back period) in order for the Claims Administrator to calculate your Recognized Loss Amount under the Plan of Allocation and process your claim. **Failure to report all transaction and holding information during the requested time periods may result in the rejection of your claim.**
7. You are required to submit genuine and sufficient documentation for all of your transactions in and holdings of the iRhythm common stock set forth in the Schedule of Transactions in Part III of this Claim Form. Documentation may consist of copies of trade confirmations or account statements, or an authorized statement from your broker or other financial institution containing the transactional and holding information found in a trade confirmation or account statement. The Parties and the Claims Administrator do not independently have information about your investments in iRhythm common stock. **IF SUCH DOCUMENTS ARE NOT IN YOUR POSSESSION, PLEASE OBTAIN COPIES OF THE**

DOCUMENTS OR EQUIVALENT 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, do not highlight any portion of the Claim Form or any supporting documents.**

8. **One Claim Form should be submitted for each separate legal entity or separately managed account.** Separate Claim Forms should be submitted for each separate legal entity (e.g., an individual should not combine his or her IRA transactions with transactions made solely in the individual's name). Generally, a single Claim Form should be submitted on behalf of one legal entity including all holdings and transactions made by that entity on one Claim Form. However, if a single person or legal entity had multiple accounts that were separately managed, separate Claims may be submitted for each such account. The Claims Administrator reserves the right to request information on all the holdings and transactions in iRhythm common stock made on behalf of a single beneficial owner.

9. All joint beneficial owners must sign this Claim Form and their names must appear as "Claimants" in Part I of this Claim Form. The complete name(s) of the beneficial owner(s) must be entered. If you purchased or acquired iRhythm common stock during the Class Period and held the shares in your name, you are the beneficial owner as well as the record owner. If you purchased or acquired iRhythm common stock during the Class Period and the shares were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial owner of these shares/options, but the third party is the record owner. The beneficial owner, not the record owner, must sign this Claim Form.

10. 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, last four digits of the 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 iRhythm common stock; 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 securities in another person's accounts.)

11. 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.

12. 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 any appeals are resolved, and after the completion of all claims processing. The claims process will take substantial time to complete fully and fairly. Please be patient.

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

14. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or a copy of the Notice, you may contact the Claims Administrator, Strategic Claims Services, at the above

address, by email at info@iRhythmSecuritiesLitigation.com, or by toll-free phone at (866) 457-5539, or you can visit the website maintained by the Claims Administrator, www.iRhythmSecuritiesLitigation.com, where copies of the Claim Form and Notice are available for downloading.

15. **NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. To obtain the *mandatory* electronic filing requirements and file layout, you may visit the website www.iRhythmSecuritiesLitigation.com, or you may email the Claims Administrator's electronic filing department at info@iRhythmSecuritiesLitigation.com. **Any file that is not in accordance with the required electronic filing format will be subject to rejection.** No electronic files will be considered to have been properly submitted unless the Claims Administrator issues an email to you to that effect. **Do not assume that your file has been received until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the Claims Administrator's electronic filing department at info@iRhythmSecuritiesLitigation.com to inquire about your file and confirm it was received.**

IMPORTANT PLEASE NOTE:

YOUR CLAIM IS NOT DEEMED SUBMITTED UNTIL YOU RECEIVE AN ACKNOWLEDGMENT POSTCARD. THE CLAIMS ADMINISTRATOR WILL ACKNOWLEDGE RECEIPT OF YOUR CLAIM FORM BY MAIL WITHIN 60 DAYS. IF YOU DO NOT RECEIVE AN ACKNOWLEDGMENT POSTCARD WITHIN 60 DAYS, CALL THE CLAIMS ADMINISTRATOR TOLL FREE AT 866-457-5539.

PART III – SCHEDULE OF TRANSACTIONS IN iRHYTHM COMMON STOCK

The only eligible security is the common stock of iRhythm Technologies, Inc. (“iRhythm”). During the Class Period, iRhythm common stock traded on the NASDAQ under the ticker symbol **IRTC** with the **CUSIP 450056106**. Do not include information regarding securities other than iRhythm common stock. Please include proper documentation with your Claim Form as described in detail in Part II – General Instructions ¶ 7, above.

1. HOLDINGS AS OF JULY 25, 2022 – State the total number of shares of iRhythm common stock held as of the opening of trading on July 25, 2022. (Must be documented.) If none, write “zero” or “0.” _____				Confirm Proof of Position Enclosed ☐
2. PURCHASES/ACQUISITIONS FROM JULY 25, 2022 THROUGH AUGUST 9, 2024, INCLUSIVE – Separately list each and every purchase or acquisition (including free receipts) of iRhythm common stock from July 25, 2022 through the close of trading on August 9, 2024. (Must be documented.)				
Date of Purchase/ Acquisition (List Chronologically) (Month/Day/Year)	Number of Shares Purchased/Acquired	Purchase Price Per Share	Total Purchase Price (excluding any taxes, commissions, and fees)	Confirm Proof of Purchase/ Acquisition Enclosed
/ /		\$	\$	☐
/ /		\$	\$	☐
/ /		\$	\$	☐
/ /		\$	\$	☐
3. PURCHASES/ACQUISITIONS FROM AUGUST 10, 2024 THROUGH NOVEMBER 8, 2024, INCLUSIVE – State the total number of shares of iRhythm common stock purchased or acquired (including free receipts) from August 10, 2024 through the close of trading on November 8, 2024. If none, write “zero” or “0.” _____				
4. SALES FROM JULY 25, 2022 THROUGH NOVEMBER 8, 2024, INCLUSIVE – Separately list each and every sale or disposition (including free deliveries) of iRhythm common stock from July 25, 2022 through the close of trading on November 8, 2024. (Must be documented.)				IF NONE, CHECK HERE ☐
Date of Sale (List Chronologically) (Month/Day/Year)	Number of Shares Sold	Sale Price Per Share	Total Sale Price (not deducting any taxes, commissions, and fees)	Confirm Proof of Sale Enclosed
/ /		\$	\$	☐
/ /		\$	\$	☐
/ /		\$	\$	☐
/ /		\$	\$	☐
5. HOLDINGS AS OF NOVEMBER 8, 2024 – State the total number of shares of iRhythm common stock held as of the close of trading on November 8, 2024. (Must be documented.) If none, write “zero” or “0.” _____				Confirm Proof of Position Enclosed ☐
IF YOU REQUIRE ADDITIONAL SPACE FOR THE SCHEDULE ABOVE, ATTACH EXTRA SCHEDULES IN THE SAME FORMAT. PRINT THE BENEFICIAL OWNER’S FULL NAME AND LAST FOUR DIGITS OF SOCIAL SECURITY/TAXPAYER IDENTIFICATION NUMBER ON EACH ADDITIONAL PAGE. IF YOU DO ATTACH EXTRA SCHEDULES, CHECK THIS BOX. ☐				

PART IV – RELEASE OF CLAIMS, CERTIFICATION, 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, pursuant to the terms set forth in the Stipulation, without further action by anyone, upon the Effective Date of the Settlement, I (we), on behalf of myself (ourselves) and my (our) (the claimant(s)') respective heirs, executors, administrators, predecessors, successors, and assigns, in their capacities as such, 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 Plaintiff's Claim against Defendants and the other Defendants' Releasees, and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiff's Claims against any of the Defendants' Releasees.

CERTIFICATION

By signing and submitting this Claim Form, the claimant(s) or the person(s) who represent(s) the claimant(s) agree(s) to the release above and 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 is (are) not excluded by definition from the Settlement Class as set forth in the Notice;
3. that the claimant(s) did **not** submit a request for exclusion from the Settlement Class;
4. that I (we) owned the iRhythm common stock identified in the Claim Form and have not assigned the claim against any of the Defendants or any of the other Defendants' Releasees 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;
5. that the claimant(s) has (have) not submitted any other claim covering the same purchases of iRhythm common stock and knows (know) of no other person having done so on the claimant's (claimants') behalf;
6. that the claimant(s) has (have) not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any Released Plaintiff's Claim against any of the Defendants' Releasees;
7. that the claimant(s) submit(s) to the jurisdiction of the United States District Court for the Northern District of California with respect to claimant's (claimants') claim and for purposes of enforcing the releases set forth herein;
8. 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;
9. that the claimant(s) waive(s) the right to trial by jury, to the extent it exists, and agree(s) to the determination by the Court of the validity or amount of this Claim, and waive(s) any right of appeal or review with respect to such determination;
10. 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

11. 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 (i) the claimant(s) is (are) exempt from backup withholding or (ii) the claimant(s) has (have) not been notified by the IRS that he, she, it, or they is (are) subject to backup withholding as a result of a failure to report all interest or dividends or (iii) the IRS has notified the claimant(s) that he, she, it, or 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.**

UNDER THE PENALTIES OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, 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 claimant name here

Signature of joint claimant, if any

Date

Print joint claimant 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 name of person signing on behalf of claimant 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* ¶ 10 on page 4 of this Claim Form.)

REMINDER CHECKLIST

1. Sign the above release and certification. If this Claim Form is being made on behalf of joint claimants, then both must sign.
2. Attach only *copies* of acceptable supporting documentation as these documents will not be returned to you.
3. Do not highlight any portion of the Claim Form or any supporting documents.
4. Keep copies of the completed Claim Form and documentation for your own records.
5. The Claims Administrator will acknowledge receipt of your Claim Form by mail, within 60 days. Your claim is not deemed filed until you receive an acknowledgment postcard. **If you do not receive an acknowledgment postcard within 60 days, please call the Claims Administrator toll-free at (866) 457-5539.**
6. If your address changes in the future, or if this Claim Form was sent to an old or incorrect address, you must send the Claims Administrator written notification of your new address. If you change your name, inform the Claims Administrator.
7. If you have any questions or concerns regarding your Claim Form, contact the Claims Administrator at the mailing address below, by email at info@iRhythmSecuritiesLitigation.com, or by toll-free phone at (866) 457-5539, or you may visit www.iRhythmSecuritiesLitigation.com. DO NOT call iRhythm, the other Defendants, or their counsel with questions regarding your Claim Form.

This Claim Form must be mailed to the Claims Administrator by First-Class Mail or submitted online at www.iRhythmSecuritiesLitigation.com, postmarked (or submitted online) no later than October 1, 2026. If mailed, the Claim Form should be addressed as follows:

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

Payments to eligible Authorized Claimants will be made only if the Court approves the Settlement, after any appeals are resolved, and after the completion of all claims processing.

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.

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iRhythm Securities Litigation
c/o Strategic Claims Services
600 N. Jackson St., Suite 205
Media, PA 19063

Important Legal Notice: If you purchased or acquired iRhythm common stock from July 25, 2022 through August 9, 2024, you could get a payment from a class action settlement.

PLEASE FORWARD

AFFIDAVIT

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

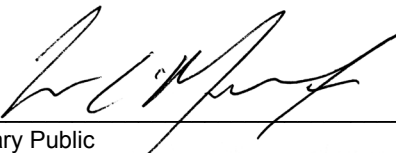
I, Wayne Sidor, being duly sworn, depose and say that I am the Advertising Clerk of
the Publisher of THE WALL STREET JOURNAL, a daily national newspaper of
general circulation throughout the United States, and that the notice attached to
this Affidavit has been regularly published in THE WALL STREET JOURNAL for
National distribution for
1 insertion(s) on the following date(s): 08/06/2026

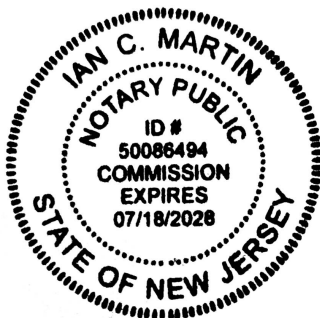
ADVERTISER: IRHYTHM TECHNOLOGIES, INC.

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

Sworn to
before me this
6th day of
August 2026

Wayne Sidor


Notary Public



Sarah Evans

From: Philadelphia Editorial <phhubs@prnewswire.com>
Sent: Thursday, August 6, 2026 8:01 AM
To: Sarah Evans; Josephine Bravata; Benjamin Lowenthal
Subject: PR Newswire: Press Release Distribution Confirmation for Bernstein Litowitz Berger & Grossmann LLP. ID#4734123-1-1

Hello

Your press release was successfully distributed at: 06-Aug-2026 08:00:00 AM ET

Release headline: Bernstein Litowitz Berger & Grossmann LLP Announces Proposed Class Action Settlement on Behalf of Purchasers of iRhythm Technologies, Inc. Common Stock

Word Count: 1256

Product Selections: US1

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PR Newswire ID: 4734123-1-1

View your release:* https://www.prnewswire.com/news-releases/bernstein-litowitz-berger--grossmann-llp-announces-proposed-class-action-settlement-on-behalf-of-purchasers-of-irhythm-technologies-inc-common-stock-302844077.html?tc=eml_cleartime

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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.

Bernstein Litowitz Berger & Grossmann LLP Announces Proposed Class Action Settlement on Behalf of Purchasers of iRhythm Technologies, Inc. Common Stock

NEWS PROVIDED BY

Bernstein Litowitz Berger & Grossmann LLP →

Aug 06, 2026, 08:00 ET

SAN FRANCISCO, Aug. 6, 2026 /PRNewswire/ -- Bernstein Litowitz Berger & Grossmann LLP announces that the United States District Court for the Northern District of California has approved the following announcement of a proposed class action settlement that would benefit purchasers of common stock of iRhythm Technologies, Inc. (NASDAQ: **IRTC**):

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

GLAZING EMPLOYERS AND GLAZIERS'
UNION LOCAL #27 PENSION AND
RETIREMENT FUND, on behalf of itself and all
others similarly situated,

Plaintiff,

v.

iRHYTHM TECHNOLOGIES, INC., et al.,

Defendants.

Case No. 3:24-cv-706-JSC

CLASS ACTION

Judge: Honorable Jacqueline Scott Corley

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



TO: All persons who purchased or otherwise acquired iRhythm Technologies, Inc. ("iRhythm") common stock from July 25, 2022 through August 9, 2024, inclusive (the "Class Period"), and were allegedly damaged thereby ("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 Northern District of California ("Court"), that the above-captioned securities class action (the "Action") is pending in the Court.

YOU ARE ALSO NOTIFIED that Lead Plaintiff Oklahoma Firefighters Pension and Retirement System, on behalf of itself and the Settlement Class, and Defendants iRhythm Technologies, Inc. ("iRhythm" or the "Company") and Quentin Blackford (together, "Defendants") have reached a proposed settlement of the Action on behalf of the Settlement Class for **\$45,000,000** in cash (the "Settlement"). If approved by the Court, the Settlement will resolve all claims in the Action.

In the Action, Lead Plaintiff asserts federal securities law claims against iRhythm and its Chief Executive Officer, Quentin Blackford, arising from allegedly materially false and misleading statements or omissions during the Class Period concerning iRhythm's Zio AT heart monitoring device. Lead Plaintiff alleges that Defendants' alleged misstatements violated Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), and that Mr. Blackford controlled iRhythm when the misstatements were made, in violation of Section 20(a) of the Exchange Act. Defendants expressly deny that Lead Plaintiff has asserted any valid claims as to either of them, and expressly deny any and all allegations of fault, liability, wrongdoing, or damages whatsoever in connection with the Action. Issues and defenses at issue in the Action included, among others, (i) whether Defendants made materially false statements or omissions; (ii) whether Defendants made the statements with the required state of mind; (iii) whether the alleged misstatements caused class members' losses; and (iv) the amount of damages, if any.²

A hearing ("Settlement Hearing") will be held on **November 5, 2026 at 9:00 a.m. Pacific Time**, before the Honorable Jacqueline Scott Corley, United States District Court Judge for the Northern District of California, by Zoom videoconference, to determine, among other things: (i) whether, for purposes of settlement, the Action should be certified as a class action on behalf of the Settlement Class, Lead Plaintiff should be appointed as the class representative for the Settlement Class, and Lead Counsel should be appointed as class counsel for the Settlement Class; (ii) whether the Settlement on the terms and conditions provided for in the Stipulation is fair, reasonable, and adequate to the Settlement Class, and should be finally approved by the Court; (iii) whether 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; (iv) whether the proposed Plan of Allocation should be approved as fair and reasonable; and (v) whether Lead Counsel's motion for attorneys' fees in an amount not to exceed 25% of the Settlement

Fund (i.e., \$11.25 million) and payment of expenses in an amount not to exceed \$800,000 (which amount may include a request for reimbursement of the reasonable costs and expenses incurred by Lead Plaintiff directly related to its representation of the Settlement Class) should be approved. Any updates regarding the Settlement Hearing, including information on how to attend the Zoom video conference and any changes to the date or time of the hearing or updates regarding in-person or remote appearances at the hearing, will be posted to the website for the Settlement, www.iRhythmSecuritiesLitigation.com.

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 proceeds. This notice provides only a summary of the information contained in the detailed Notice. You may obtain a copy of the Notice, along with the Claim Form, by: (i) contacting the Claims Administrator at *iRhythm Securities Litigation*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 205, Media, PA 19063, 1-866-457-5539, info@iRhythmSecuritiesLitigation.com; or (ii) downloading them from the website for the Settlement, www.iRhythmSecuritiesLitigation.com.

To be eligible to receive a payment from the Settlement, you must be a member of the Settlement Class and submit a Claim Form **postmarked (if mailed), or online, no later than October 1, 2026**, in accordance with the instructions set forth in the Claim Form. If you are a Settlement Class Member and do not submit a proper Claim Form, you will not be eligible to share in the Settlement proceeds, 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 such that it is **received no later than October 1, 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 receive any benefits from the Settlement.

Any objections to the proposed Settlement, the proposed Plan of Allocation, and/or Lead Counsel's motion for attorneys' fees and expenses, must be submitted to the Court. Objections must be **filed or postmarked (if mailed) no later than October 1, 2026**, in accordance with the instructions set forth in the Notice.

PLEASE DO NOT CONTACT THE COURT, THE CLERK'S OFFICE, DEFENDANTS, OR DEFENDANTS' COUNSEL REGARDING THIS NOTICE. All questions about this notice, the 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 the Claims Administrator:

c/o Strategic Claims Services

P.O. Box 230

600 N. Jackson Street, Suite 205

Media, PA 19063

1-866-457-5539

info@iRhythmSecuritiesLitigation.com

www.iRhythmSecuritiesLitigation.com

All other inquiries should be made to Lead Counsel:

Bernstein Litowitz Berger & Grossmann LLP

Katherine M. Sinderson

1251 Avenue of the Americas

New York, NY 10020

1-800-380-8496

settlements@blbglaw.com

BY ORDER OF THE COURT

United States District Court

Northern District of California

¹ Certain persons and entities are excluded from the Settlement Class by definition, as set forth in the full Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Notice"), available at **www.iRhythmSecuritiesLitigation.com**.

² Capitalized terms not otherwise defined herein shall have the same meaning as in the Stipulation and Agreement of Settlement dated June 3, 2026 (the "Stipulation"). The Stipulation can be viewed at **www.iRhythmSecuritiesLitigation.com**.

SOURCE Bernstein Litowitz Berger & Grossmann LLP

Exhibit 4

EXHIBIT 4

*Glazing Employers & Glaziers' Union Local #27 Pension & Retirement Fund
v. iRhythm Technologies, Inc., Case No. 3:24-cv-706-JSC (N.D. Cal.)*

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP**TIME REPORT**

From Inception Through July 31, 2026

| NAME | HOURS | HOURLY RATE | LODESTAR |
|------------------------------|----------|-------------|----------------|
| Partners | | | |
| Scott Foglietta | 63.50 | \$1,500 | \$95,250.00 |
| John Rizio-Hamilton | 68.00 | \$1,800 | \$122,400.00 |
| Katherine M. Sinderson | 804.75 | \$1,600 | \$1,287,600.00 |
| | | | |
| Senior Counsel | | | |
| Alec Coquin | 351.75 | \$1,100 | \$386,925.00 |
| David L. Duncan | 58.25 | \$1,100 | \$64,075.00 |
| | | | |
| Associates | | | |
| Brittney Balser | 140.00 | \$875 | \$122,500.00 |
| Girolamo Brunetto | 38.25 | \$875 | \$33,468.75 |
| Andrea Dorado | 73.50 | \$425 | \$31,237.50 |
| Abygail Kritta | 838.75 | \$650 | \$545,187.50 |
| Nicole Santoro | 199.00 | \$500 | \$99,500.00 |
| Sarah Schmidt | 67.50 | \$600 | \$40,500.00 |
| Thomas Sperber | 1,121.00 | \$875 | \$980,875.00 |
| | | | |
| Senior Staff Attorney | | | |
| Andrew Boruch | 86.25 | \$525 | \$45,281.25 |
| Danielle Disporto | 87.00 | \$525 | \$45,675.00 |
| Jared Hoffman | 421.25 | \$525 | \$221,156.25 |
| Lawrence Hosmer | 100.75 | \$525 | \$52,893.75 |
| Young Lee | 314.75 | \$525 | \$165,243.75 |
| Juan Lossada | 932.75 | \$525 | \$489,693.75 |
| | | | |
| Staff Attorneys | | | |
| Daniel Ackeret | 785.75 | \$450 | \$353,587.50 |
| Randall Hirsch | 464.25 | \$475 | \$220,518.75 |
| Yihong Huang | 324.25 | \$475 | \$154,018.75 |

| NAME | HOURS | HOURLY RATE | LODESTAR |
|---------------------------------------|-----------------|-------------|-----------------------|
| Director of Investor Services | | | |
| Adam Weinschel | 33.75 | \$650 | \$21,937.50 |
| | | | |
| Financial Analysts | | | |
| Nick DeFilippis | 15.00 | \$700 | \$10,500.00 |
| Tyler Edwards | 19.00 | \$500 | \$9,500.00 |
| Tanjila Sultana | 24.25 | \$550 | \$13,337.50 |
| | | | |
| Investigators | | | |
| Amy Bitkower | 65.00 | \$650 | \$42,250.00 |
| Jacob Foster | 24.00 | \$400 | \$9,600.00 |
| Laura Marvelli | 388.50 | \$500 | \$194,250.00 |
| | | | |
| Case Managers & Paralegals | | | |
| Cindy Bomzer-Stein | 482.75 | \$450 | \$217,237.50 |
| Khristine De Leon | 26.75 | \$450 | \$12,037.50 |
| Matthew Mahady | 53.50 | \$450 | \$24,075.00 |
| Toby Savano | 11.00 | \$450 | \$4,950.00 |
| | | | |
| Litigation Support | | | |
| Paul Charlotin | 20.75 | \$475 | \$9,856.25 |
| Roberto Santamarina | 33.75 | \$525 | \$17,718.75 |
| Julio Velazquez | 21.25 | \$475 | \$10,093.75 |
| | | | |
| Managing Clerk's Office | | | |
| Mahiri Buffong | 88.00 | \$500 | \$44,000.00 |
| Jessica Lacon | 40.75 | \$450 | \$18,337.50 |
| Janielle Lattimore | 55.75 | \$475 | \$26,481.25 |
| | | | |
| TOTALS: | 8,745.00 | | \$6,243,750.00 |

Exhibit 5

EXHIBIT 5

Glazing Employers & Glaziers' Union Local #27 Pension & Retirement Fund v. iRhythm Technologies, Inc.,
Case No. 3:24-cv-706-JSC (N.D. Cal.)

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

BREAKDOWN OF LEAD COUNSEL'S TIME BY MAJOR LITIGATION TASKS

Inception through July 31, 2026

Categories:

(1) Investigation & Case Analysis
(2) Initial Complaint
(3) Lead Plaintiff Motion
(4) Amended Complaints

(5) Motion to Dismiss Opposition
(6) Judgment on the Pleadings Opposition
(7) Class Certification
(8) Discovery - General

(9) Discovery - Written/Documents
(10) Discovery - Depositions
(11) Experts
(12) Mediator & Settlement

(13) Case Management
(14) Strategy & Analysis
(15) Docket/News Monitoring
(16) Client Communications

| Name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | Total Hours | Rate | Total Lodestar |
|--------------------------------------|--------|-------|-------|--------|--------|-------|--------|--------|--------|--------|-------|--------|-------|-------|------|-------|-------------|---------|----------------|
| Partners | | | | | | | | | | | | | | | | | | | |
| Scott Foglietta | 1.25 | 7.25 | 1.00 | | | | | | | | | | 1.00 | 2.00 | | 51.00 | 63.50 | \$1,500 | \$95,250.00 |
| John Rizio-Hamilton | | | | 17.50 | 8.50 | 1.75 | 2.75 | 6.50 | | | | 17.00 | 6.00 | 8.00 | | | 68.00 | \$1,800 | \$122,400.00 |
| Katherine M. Sinderson | 1.00 | | 1.00 | 113.75 | 150.75 | 37.75 | 110.75 | 82.50 | 39.25 | 86.25 | 30.50 | 105.00 | 23.50 | 7.25 | | 15.50 | 804.75 | \$1,600 | \$1,287,600.00 |
| Senior Counsel | | | | | | | | | | | | | | | | | | | |
| Alec Coquin | | | | | | | 131.75 | 2.25 | 52.75 | 57.00 | 50.00 | 50.75 | | 7.25 | | | 351.75 | \$1,100 | \$386,925.00 |
| David L. Duncan | | | | | | | | | | | | 58.25 | | | | | 58.25 | \$1,100 | \$64,075.00 |
| Associates | | | | | | | | | | | | | | | | | | | |
| Brittney Balser | | | | | 136.50 | | | | | | | | | | | 3.50 | 140.00 | \$875 | \$122,500.00 |
| Girolamo Brunetto | 0.50 | | 19.50 | | | | | | | | 0.50 | | 2.50 | 1.50 | | 13.75 | 38.25 | \$875 | \$33,468.75 |
| Andrea Dorado | 11.00 | 13.00 | | | | | | | | | | | | | | 49.50 | 73.50 | \$425 | \$31,237.50 |
| Abygail Krita | 1.50 | | | | | 74.75 | 151.50 | 145.25 | 227.50 | 89.25 | 27.75 | 81.00 | 37.00 | 2.25 | | 1.00 | 838.75 | \$650 | \$545,187.50 |
| Nicole Santoro | 12.00 | | | 175.25 | | | | | | | 5.00 | | 4.75 | 2.00 | | | 199.00 | \$500 | \$99,500.00 |
| Sarah Schmidt | | | | | 54.25 | | | 13.25 | | | | | | | | | 67.50 | \$600 | \$40,500.00 |
| Thomas Sperber | 17.50 | | | 139.75 | 152.50 | 22.25 | 170.25 | 140.75 | 283.75 | 51.75 | 63.25 | 37.75 | 29.00 | 11.00 | 0.75 | 0.75 | 1,121.00 | \$875 | \$980,875.00 |
| Senior Staff Attorneys | | | | | | | | | | | | | | | | | | | |
| Andrew Boruch | 86.25 | | | | | | | | | | | | | | | | 86.25 | \$525 | \$45,281.25 |
| Danielle Disporto | | | | | | | | | 87.00 | | | | | | | | 87.00 | \$525 | \$45,675.00 |
| Jared Hoffman | | | | | | | 7.50 | | 154.00 | 255.25 | | 4.50 | | | | | 421.25 | \$525 | \$221,156.25 |
| Lawrence Hosmer | | | | | | | | | 100.75 | | | | | | | | 100.75 | \$525 | \$52,893.75 |
| Young Lee | | | | | | | | | 152.25 | 159.25 | | 3.00 | | 0.25 | | | 314.75 | \$525 | \$165,243.75 |
| Juan Lossada | | | | | | | 3.50 | | 575.00 | 340.00 | | 14.25 | | | | | 932.75 | \$525 | \$489,693.75 |
| Staff Attorneys | | | | | | | | | | | | | | | | | | | |
| Daniel Ackeret | | | | | | 8.50 | 11.00 | | 549.25 | 197.00 | 13.00 | 7.00 | | | | | 785.75 | \$450 | \$353,587.50 |
| Randall Hirsch | | | | | | | | | 253.75 | 206.75 | | 3.75 | | | | | 464.25 | \$475 | \$220,518.75 |
| Yihong Huang | | | | | | | | | 324.25 | | | | | | | | 324.25 | \$475 | \$154,018.75 |
| Director of Investor Services | | | | | | | | | | | | | | | | | | | |
| Adam Weinschel | 22.00 | 0.50 | 7.50 | 1.75 | | | | | 0.50 | 1.00 | | | | | | 0.50 | 33.75 | \$650 | \$21,937.50 |
| Financial Analysts | | | | | | | | | | | | | | | | | | | |
| Nick DeFilippis | 15.00 | | | | | | | | | | | | | | | | 15.00 | \$700 | \$10,500.00 |
| Tyler Edwards | 19.00 | | | | | | | | | | | | | | | | 19.00 | \$500 | \$9,500.00 |
| Tanjila Sultana | 22.25 | 0.50 | 1.50 | | | | | | | | | | | | | | 24.25 | \$550 | \$13,337.50 |
| Investigators | | | | | | | | | | | | | | | | | | | |
| Amy Bitkower | 65.00 | | | | | | | | | | | | | | | | 65.00 | \$650 | \$42,250.00 |
| Jacob Foster | | | | | | | | | | | | | | | | | 24.00 | \$400 | \$9,600.00 |
| Laura Marvelli | 388.25 | | | | | | | | | | | | 0.25 | | | | 388.50 | \$500 | \$194,250.00 |

EXHIBIT 5

Glazing Employers & Glaziers' Union Local #27 Pension & Retirement Fund v. iRhythm Technologies, Inc.,
Case No. 3:24-cv-706-JSC (N.D. Cal.)

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

BREAKDOWN OF LEAD COUNSEL'S TIME BY MAJOR LITIGATION TASKS

Inception through July 31, 2026

Categories:

(1) Investigation & Case Analysis

(2) Initial Complaint

(3) Lead Plaintiff Motion

(4) Amended Complaints

(5) Motion to Dismiss Opposition

(6) Judgment on the Pleadings Opposition

(7) Class Certification

(8) Discovery - General

(9) Discovery - Written/Documents

(10) Discovery - Depositions

(11) Experts

(12) Mediation & Settlement

(13) Case Management

(14) Strategy & Analysis

(15) Docket/News Monitoring

(16) Client Communications

| Name | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | Total Hours | Rate | Total Lodestar |
|---------------------------------------|---------------|--------------|--------------|---------------|---------------|---------------|---------------|---------------|-----------------|-----------------|---------------|---------------|---------------|--------------|--------------|---------------|-----------------|-------|-----------------------|
| Case Managers & Paralegals | | | | | | | | | | | | | | | | | | | |
| Cindy Bomzer-Stein | 22.25 | | | 50.75 | 65.00 | 29.25 | 65.00 | 26.25 | 65.50 | 24.00 | 27.00 | 50.75 | 46.00 | 0.25 | 10.00 | 0.75 | 482.75 | \$450 | \$217,237.50 |
| Khristine De Leon | 0.25 | 21.50 | 2.25 | | | | | | | | | | 2.75 | | | | 26.75 | \$450 | \$12,037.50 |
| Matthew Mahady | 1.25 | 25.25 | 18.25 | | | | | | 0.25 | | | | 3.25 | 1.75 | | 3.50 | 53.50 | \$450 | \$24,075.00 |
| Toby Saviano | 2.00 | | | 8.50 | | | | | | | | | 0.50 | | | | 11.00 | \$450 | \$4,950.00 |
| Litigation Support | | | | | | | | | | | | | | | | | | | |
| Paul Charlotin | | | | | | | | | 19.25 | | | | 1.50 | | | | 20.75 | \$475 | \$9,856.25 |
| Roberto Santamarina | 5.00 | | | | | | | 1.00 | 27.75 | | | | | | | | 33.75 | \$525 | \$17,718.75 |
| Julio Velazquez | | | | | | | | | 20.50 | 0.75 | | | | | | | 21.25 | \$475 | \$10,093.75 |
| Managing Clerk's Office | | | | | | | | | | | | | | | | | | | |
| Mahiri Buffong | | 0.75 | | 10.50 | 2.25 | | 8.00 | 1.50 | 3.50 | | | | 61.50 | | | | 88.00 | \$500 | \$44,000.00 |
| Jessica Lacon | | | | 1.75 | 0.50 | | | | 10.75 | | | | 27.25 | | 0.50 | | 40.75 | \$450 | \$18,337.50 |
| Janielle Lattimore | | 0.25 | | 18.00 | 9.00 | 7.75 | 5.25 | 2.50 | | | | | 12.50 | | 0.50 | | 55.75 | \$475 | \$26,481.25 |
| TOTAL HOURS: | 717.25 | 69.00 | 51.00 | 537.50 | 525.00 | 236.25 | 667.25 | 421.75 | 2,947.50 | 1,468.25 | 217.00 | 433.00 | 259.25 | 43.50 | 11.75 | 139.75 | 8,745.00 | | \$6,243,750.00 |

Exhibit 6

EXHIBIT 6

*Glazing Employers & Glaziers' Union Local #27 Pension
& Retirement Fund v. iRhythm Technologies, Inc. ,
Case No. 3:24-cv-706-JSC (N.D. Cal.)*

**BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
DAILY TIME RECORDS - Inception to July 31, 2026**

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------|---|-----------|-------|---------|-------------|
| 06/16/2023 | Adam Weinschel | Director of Investor Services | Reviewed client losses concerning potential new matter concerning iRhythm | 01 | 1.00 | \$650 | \$650.00 |
| 06/16/2023 | Katherine Sinderson | Partner | Drafting email to client regarding potential new matter concerning iRhythm | 16 | 0.75 | \$1,600 | \$1,200.00 |
| 06/30/2023 | Nick DeFilippis | Director of Financial Analyst | Case analysis of potential new matter: iRhythm | 01 | 7.00 | \$700 | \$4,900.00 |
| 07/21/2023 | Andrea Dorado | Associate | Initial case analysis regarding potential claims against iRhythm | 01 | 4.00 | \$425 | \$1,700.00 |
| 07/24/2023 | Andrea Dorado | Associate | Initial case analysis regarding potential claims against iRhythm | 01 | 7.00 | \$425 | \$2,975.00 |
| 07/25/2023 | Andrea Dorado | Associate | Draft initial client analysis memo | 16 | 5.25 | \$425 | \$2,231.25 |
| 07/26/2023 | Andrea Dorado | Associate | Draft initial client analysis memo | 16 | 4.25 | \$425 | \$1,806.25 |
| 07/26/2023 | Khristine De Leon | Case Manager | Pull Analyst Reports; circulate same to team. | 01 | 0.25 | \$450 | \$112.50 |
| 07/27/2023 | Adam Weinschel | Director of Investor Services | Downloaded holders and calculated estimated losses. Reviewed client losses | 01 | 2.00 | \$650 | \$1,300.00 |
| 07/27/2023 | Andrea Dorado | Associate | Draft initial client analysis memo | 16 | 4.25 | \$425 | \$1,806.25 |
| 08/02/2023 | Andrea Dorado | Associate | Draft initial client analysis memo | 16 | 12.00 | \$425 | \$5,100.00 |
| 08/03/2023 | Andrea Dorado | Associate | Draft initial client analysis memo | 16 | 8.00 | \$425 | \$3,400.00 |
| 08/03/2023 | Matthew Mahady | Case Manager | Prepared materials for attorney in preparation for draft complaint | 02 | 2.00 | \$450 | \$900.00 |
| 08/03/2023 | Scott Foglietta | Partner | Editing client analysis memo | 16 | 3.00 | \$1,500 | \$4,500.00 |
| 08/04/2023 | Matthew Mahady | Case Manager | Prepared materials for attorney in preparation for draft complaint | 02 | 2.50 | \$450 | \$1,125.00 |
| 08/07/2023 | Scott Foglietta | Partner | Editing client analysis memo | 16 | 5.00 | \$1,500 | \$7,500.00 |
| 08/10/2023 | Andrea Dorado | Associate | Researching and editing client analysis memo | 16 | 8.00 | \$425 | \$3,400.00 |
| 08/12/2023 | Andrea Dorado | Associate | Researching and editing client analysis memo | 16 | 6.00 | \$425 | \$2,550.00 |
| 08/16/2023 | Matthew Mahady | Case Manager | Assist attorney with draft client memo | 16 | 0.50 | \$450 | \$225.00 |
| 08/16/2023 | Scott Foglietta | Partner | Editing client analysis memo | 16 | 8.00 | \$1,500 | \$12,000.00 |
| 08/17/2023 | Adam Weinschel | Director of Investor Services | Downloaded holders and calculated estimated losses. Reviewed client losses. | 01 | 4.00 | \$650 | \$2,600.00 |
| 08/17/2023 | Matthew Mahady | Case Manager | Assist attorney with draft client memo | 16 | 1.75 | \$450 | \$787.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|-------------------|-------------------------------|---|-----------|-------|---------|-------------|
| 08/17/2023 | Scott Foglietta | Partner | Editing client memo | 16 | 8.00 | \$1,500 | \$12,000.00 |
| 08/21/2023 | Scott Foglietta | Partner | Editing client memo | 16 | 2.00 | \$1,500 | \$3,000.00 |
| 08/23/2023 | Adam Weinschel | Director of Investor Services | Reviewed client losses. Reviewed dollar drops and calculated overall value declines. Assisted with client case analysis memos | 01 | 1.00 | \$650 | \$650.00 |
| 08/23/2023 | Scott Foglietta | Partner | Editing case memo | 16 | 2.00 | \$1,500 | \$3,000.00 |
| 08/24/2023 | Andrea Dorado | Associate | iRhythm memo draft | 16 | 1.75 | \$425 | \$743.75 |
| 08/24/2023 | Tanjila Sultana | Financial Analyst | Review iRhythm Technologies Inc. (IRTC) target client losses. | 01 | 4.50 | \$550 | \$2,475.00 |
| 08/25/2023 | Adam Weinschel | Director of Investor Services | Reviewed client losses. Revised estimated losses on holders. | 01 | 1.50 | \$650 | \$975.00 |
| 08/25/2023 | Adam Weinschel | Director of Investor Services | Assisted with client memos | 16 | 0.50 | \$650 | \$325.00 |
| 08/25/2023 | Scott Foglietta | Partner | Client outreach | 16 | 2.00 | \$1,500 | \$3,000.00 |
| 08/25/2023 | Tanjila Sultana | Financial Analyst | Review target client losses in iRhythm Technologies Inc. (IRTC) CP: 1/11/22 - 5/30/23 | 01 | 7.00 | \$550 | \$3,850.00 |
| 08/30/2023 | Andrea Dorado | Associate | Draft initial complaint | 02 | 6.00 | \$425 | \$2,550.00 |
| 08/30/2023 | Scott Foglietta | Partner | Editing case analysis memo | 16 | 7.00 | \$1,500 | \$10,500.00 |
| 08/31/2023 | Andrea Dorado | Associate | Draft initial complaint | 02 | 7.00 | \$425 | \$2,975.00 |
| 10/16/2023 | Adam Weinschel | Director of Investor Services | Reviewed client losses | 01 | 0.50 | \$650 | \$325.00 |
| 10/17/2023 | Scott Foglietta | Partner | Editing complaint | 02 | 1.50 | \$1,500 | \$2,250.00 |
| 10/17/2023 | Scott Foglietta | Partner | Client outreach | 16 | 0.50 | \$1,500 | \$750.00 |
| 10/18/2023 | Adam Weinschel | Director of Investor Services | Calculated classwide damages; reviewed client losses | 01 | 2.00 | \$650 | \$1,300.00 |
| 10/18/2023 | Scott Foglietta | Partner | Client outreach | 16 | 0.75 | \$1,500 | \$1,125.00 |
| 10/18/2023 | Scott Foglietta | Partner | Editing complaint | 02 | 2.25 | \$1,500 | \$3,375.00 |
| 10/19/2023 | Adam Weinschel | Director of Investor Services | Reviewed client losses | 01 | 1.00 | \$650 | \$650.00 |
| 10/19/2023 | Khristine De Leon | Case Manager | Review next board meeting dates for clients; circulate same to team. | 13 | 0.50 | \$450 | \$225.00 |
| 10/19/2023 | Khristine De Leon | Case Manager | Review initial complaint. | 02 | 2.50 | \$450 | \$1,125.00 |
| 10/19/2023 | Matthew Mahady | Case Manager | Assist attorney with draft intial complaint | 02 | 2.00 | \$450 | \$900.00 |
| 10/19/2023 | Scott Foglietta | Partner | Client outreach | 16 | 2.00 | \$1,500 | \$3,000.00 |
| 10/20/2023 | Khristine De Leon | Case Manager | Review initial complaint. | 02 | 5.00 | \$450 | \$2,250.00 |
| 10/20/2023 | Matthew Mahady | Case Manager | Assist attorney with client outreach | 16 | 0.50 | \$450 | \$225.00 |
| 10/30/2023 | Khristine De Leon | Case Manager | Review complaint. | 02 | 3.50 | \$450 | \$1,575.00 |
| 10/31/2023 | Adam Weinschel | Director of Investor Services | Assembled verified client losses, downloaded and reviewed PortfolioWatch losses, refreshed 13F estimated losses | 01 | 2.00 | \$650 | \$1,300.00 |
| 10/31/2023 | Matthew Mahady | Case Manager | Assist attorney with draft memo to clients | 16 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|-------------------|-------------------------------|---|-----------|-------|---------|------------|
| 10/31/2023 | Matthew Mahady | Case Manager | Emails with financial analysts re: proper class period; organize and update case analysis file | 01 | 1.25 | \$450 | \$562.50 |
| 10/31/2023 | Matthew Mahady | Case Manager | Review and edit draft initial complaint | 02 | 0.75 | \$450 | \$337.50 |
| 11/01/2023 | Khristine De Leon | Case Manager | Review initial complaint. | 02 | 1.75 | \$450 | \$787.50 |
| 11/01/2023 | Matthew Mahady | Case Manager | Review and edit draft initial complaint | 02 | 2.75 | \$450 | \$1,237.50 |
| 12/19/2023 | Adam Weinschel | Director of Investor Services | Reviewed client losses and estimated losses on holders | 01 | 1.00 | \$650 | \$650.00 |
| 12/20/2023 | Scott Foglietta | Partner | Client outreach | 16 | 3.00 | \$1,500 | \$4,500.00 |
| 01/17/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses | 01 | 1.00 | \$650 | \$650.00 |
| 01/17/2024 | Brittney Balser | Associate | Draft client memo | 16 | 3.50 | \$875 | \$3,062.50 |
| 01/17/2024 | Scott Foglietta | Partner | Identifying named plaintiffs | 02 | 1.50 | \$1,500 | \$2,250.00 |
| 01/17/2024 | Scott Foglietta | Partner | Preparing client update | 16 | 1.50 | \$1,500 | \$2,250.00 |
| 01/17/2024 | Tanjila Sultana | Financial Analyst | Target client losses in iRhythm Technologies Inc. (IRTC) | 01 | 2.25 | \$550 | \$1,237.50 |
| 02/01/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses and certification for name plaintiff | 02 | 0.50 | \$650 | \$325.00 |
| 02/01/2024 | Khristine De Leon | Case Manager | Prepare certification and retainer for Glaziers Local 27. | 02 | 1.00 | \$450 | \$450.00 |
| 02/01/2024 | Khristine De Leon | Case Manager | Prepare conflict check for Glaziers Local 27. | 02 | 0.25 | \$450 | \$112.50 |
| 02/01/2024 | Matthew Mahady | Case Manager | Proof and edit draft initial complaint; draft certification and retainer for Glaziers Local #27 Pension and Retirement Fund | 02 | 6.50 | \$450 | \$2,925.00 |
| 02/01/2024 | Tanjila Sultana | Financial Analyst | Research class period transactions iRhythm Technologies Inc for the Schedule A in the cert. | 02 | 0.50 | \$550 | \$275.00 |
| 02/02/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses | 01 | 1.00 | \$650 | \$650.00 |
| 02/02/2024 | Jacob Foster | Investigator | iRhythm address searches | 01 | 1.00 | \$400 | \$400.00 |
| 02/02/2024 | Khristine De Leon | Case Manager | Review initial complaint. | 02 | 1.25 | \$450 | \$562.50 |
| 02/02/2024 | Khristine De Leon | Case Manager | Prepare initial complaint ancillary papers. | 02 | 0.25 | \$450 | \$112.50 |
| 02/02/2024 | Khristine De Leon | Case Manager | Revise Glaziers Local # 27 Retainer and Certification; circulate same to team. | 02 | 0.50 | \$450 | \$225.00 |
| 02/02/2024 | Matthew Mahady | Case Manager | Update draft initial complaint per attorney edits and comments; call with attorney re: outstanding questions; circulate draft complaint and certification and retainer for Glaziers Local #27 Pension and Retirement Fund | 02 | 3.25 | \$450 | \$1,462.50 |
| 02/02/2024 | Scott Foglietta | Partner | Editing complaint | 02 | 2.00 | \$1,500 | \$3,000.00 |
| 02/02/2024 | Tanjila Sultana | Financial Analyst | Research iRhythm share transfers and money manager information. | 01 | 1.75 | \$550 | \$962.50 |
| 02/03/2024 | Khristine De Leon | Case Manager | Prepare initial complaint ancillary papers. | 02 | 0.75 | \$450 | \$337.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|------------|
| 02/05/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses and estimated losses on holders | 01 | 1.00 | \$650 | \$650.00 |
| 02/06/2024 | Khristine De Leon | Case Manager | Finalize complaint and initial complaint ancillary materials. | 02 | 1.50 | \$450 | \$675.00 |
| 02/06/2024 | Matthew Mahady | Case Manager | Proof, edit, finalize and file initial complaint and case opening documents; draft and finalize PSLRA notice; coordinate set up of case page and publication of notice | 02 | 3.75 | \$450 | \$1,687.50 |
| 02/07/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses | 01 | 1.00 | \$650 | \$650.00 |
| 02/07/2024 | Matthew Mahady | Case Manager | Attention to docketing error and call with clerk re: same | 02 | 0.50 | \$450 | \$225.00 |
| 02/08/2024 | Amy Bitkower | Managing Director of Investigations | Conference with attorneys regarding investigation strategy; review documents concerning iRhythm's public statements; identify potential witnesses for investigation | 01 | 1.00 | \$650 | \$650.00 |
| 02/08/2024 | Girolamo Brunetto | Associate | Researched and drafted response to client's questions; circulated internally. | 16 | 5.75 | \$875 | \$5,031.25 |
| 02/08/2024 | Katherine Sinderson | Partner | Email to Oklahoma Firefighters re iRhythm | 16 | 2.75 | \$1,600 | \$4,400.00 |
| 02/08/2024 | Khristine De Leon | Case Manager | Prepare complaint for service; correspondence with vendor re same. | 02 | 1.00 | \$450 | \$450.00 |
| 02/08/2024 | Scott Foglietta | Partner | Reviewing FOIA letter | 01 | 1.00 | \$1,500 | \$1,500.00 |
| 02/08/2024 | Scott Foglietta | Partner | Editing update for Oklahoma Firefighters | 16 | 1.00 | \$1,500 | \$1,500.00 |
| 02/08/2024 | Tanjila Sultana | Financial Analyst | Target client losses in iRhythm Technologies Inc. (IRTC) | 01 | 2.25 | \$550 | \$1,237.50 |
| 02/09/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses | 01 | 2.00 | \$650 | \$1,300.00 |
| 02/09/2024 | Girolamo Brunetto | Associate | Researched assigned judge. | 14 | 0.50 | \$875 | \$437.50 |
| 02/09/2024 | Girolamo Brunetto | Associate | Drafted email to client regarding assigned judge. | 13 | 0.50 | \$875 | \$437.50 |
| 02/09/2024 | Jessica Lacon | Docket Clerk | Initiating tracking 0888-001 iRhythm - ECF Tracking | 13 | 0.50 | \$450 | \$225.00 |
| 02/09/2024 | Khristine De Leon | Case Manager | Correspondence with team re Judge reassignment. | 13 | 0.25 | \$450 | \$112.50 |
| 02/13/2024 | Amy Bitkower | Managing Director of Investigations | Review documents for investigation; identify potential witnesses | 01 | 7.00 | \$650 | \$4,550.00 |
| 02/14/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 6.00 | \$650 | \$3,900.00 |
| 02/14/2024 | Scott Foglietta | Partner | Evaluating appropriate class period | 14 | 2.00 | \$1,500 | \$3,000.00 |
| 02/14/2024 | Tanjila Sultana | Financial Analyst | Target client iRhythm trades from February 15, 2019 to present, and current holdings. | 01 | 2.50 | \$550 | \$1,375.00 |
| 02/15/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 0.50 | \$650 | \$325.00 |
| 02/16/2024 | Khristine De Leon | Case Manager | Research next Oklahoma Firefighters Board Meeting; calendar same and update deadline for team. | 13 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------|--|-----------|-------|---------|------------|
| 02/20/2024 | Nick DeFilippis | Director of Financial Analyst | Case analysis of potential new matter | 01 | 4.00 | \$700 | \$2,800.00 |
| 02/21/2024 | Nick DeFilippis | Director of Financial Analyst | Case analysis of potential new matter | 01 | 4.00 | \$700 | \$2,800.00 |
| 02/23/2024 | Khristine De Leon | Case Manager | Calendar Notice of Publication deadline. | 02 | 0.25 | \$450 | \$112.50 |
| 02/24/2024 | Scott Foglietta | Partner | Reviewing email from witness | 01 | 0.25 | \$1,500 | \$375.00 |
| 02/24/2024 | Scott Foglietta | Partner | Client outreach | 16 | 0.25 | \$1,500 | \$375.00 |
| 02/26/2024 | Girolamo Brunetto | Associate | Correspondence with expert and S. Foglietta regarding preliminary damages analysis. | 11 | 0.50 | \$875 | \$437.50 |
| 02/26/2024 | Khristine De Leon | Case Manager | Review notice of publication; correspondence with team re same. | 02 | 0.25 | \$450 | \$112.50 |
| 02/26/2024 | Khristine De Leon | Case Manager | Correspondence with team re status of service. | 02 | 0.25 | \$450 | \$112.50 |
| 02/26/2024 | Matthew Mahady | Case Manager | Draft and file notice of publication; emails with attorneys re: same | 02 | 1.25 | \$450 | \$562.50 |
| 02/27/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case manager regarding electronic filing of affidavit of service | 02 | 0.25 | \$475 | \$118.75 |
| 02/27/2024 | Khristine De Leon | Case Manager | Correspondence with team re service. | 02 | 0.25 | \$450 | \$112.50 |
| 02/27/2024 | Khristine De Leon | Case Manager | Review dockets for examples of filing Affidavit of Service. | 02 | 0.75 | \$450 | \$337.50 |
| 02/27/2024 | Khristine De Leon | Case Manager | Correspondence with Managing Clerk's Office re filing Affidavit of Service. | 02 | 0.50 | \$450 | \$225.00 |
| 02/27/2024 | Mahiri Buffong | Managing Clerk | Reviewed and filed affidavit. | 02 | 0.75 | \$500 | \$375.00 |
| 02/27/2024 | Matthew Mahady | Case Manager | Research iRhythm's typical counsel and email attorney results | 14 | 0.50 | \$450 | \$225.00 |
| 02/28/2024 | Girolamo Brunetto | Associate | Reviewed and edited joint stipulation regarding time to respond to complaint. | 13 | 2.00 | \$875 | \$1,750.00 |
| 02/28/2024 | Khristine De Leon | Case Manager | Review stip re extension to respond. | 13 | 1.50 | \$450 | \$675.00 |
| 02/28/2024 | Scott Foglietta | Partner | Call with defendants on stip re service; revising draft | 13 | 1.00 | \$1,500 | \$1,500.00 |
| 02/29/2024 | Matthew Mahady | Case Manager | Review Defendants' proposed final draft of stipulation extending time to respond | 13 | 0.50 | \$450 | \$225.00 |
| 03/01/2024 | Girolamo Brunetto | Associate | Reviewed preliminary damages analysis. | 14 | 1.00 | \$875 | \$875.00 |
| 03/05/2024 | Scott Foglietta | Partner | Preparing update for Oklahoma Firefighters | 16 | 2.00 | \$1,500 | \$3,000.00 |
| 03/06/2024 | Girolamo Brunetto | Associate | Assembled and reviewed compendium of materials for client board meeting and circulated internally. | 16 | 3.25 | \$875 | \$2,843.75 |
| 03/08/2024 | Katherine Sinderson | Partner | Call with client re iRhythm | 16 | 1.00 | \$1,600 | \$1,600.00 |
| 03/08/2024 | Tyler Edwards | Financial Research Analyst | Losses conducted on iRhythm | 01 | 7.00 | \$500 | \$3,500.00 |
| 03/11/2024 | Katherine Sinderson | Partner | Preparing package for client board | 16 | 1.00 | \$1,600 | \$1,600.00 |
| 03/11/2024 | Khristine De Leon | Case Manager | Organize case file. | 13 | 0.25 | \$450 | \$112.50 |
| 03/11/2024 | Tyler Edwards | Financial Research Analyst | Losses conducted on iRhythm | 01 | 12.00 | \$500 | \$6,000.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|------------|
| 03/12/2024 | Girolamo Brunetto | Associate | Researched and drafted client update and prepared compendium of materials. | 16 | 2.25 | \$875 | \$1,968.75 |
| 03/13/2024 | Girolamo Brunetto | Associate | Researched and drafted client update and prepared compendium of materials; reviewed and edited same. | 16 | 2.50 | \$875 | \$2,187.50 |
| 03/13/2024 | Scott Foglietta | Partner | Editing client update memo | 16 | 3.00 | \$1,500 | \$4,500.00 |
| 03/15/2024 | Matthew Mahady | Case Manager | Draft certification and retainer for Oklahoma Firefighters; email attorneys re: status of Oklahoma Firefighters' cases | 03 | 1.50 | \$450 | \$675.00 |
| 03/18/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses and draft certification | 03 | 0.50 | \$650 | \$325.00 |
| 03/18/2024 | Matthew Mahady | Case Manager | Draft certification and retainer for Oklahoma Firefighters; assemble additional materials for Oklahoma Firefighters' review | 03 | 1.25 | \$450 | \$562.50 |
| 03/18/2024 | Scott Foglietta | Partner | Reviewing client cert and retainer | 03 | 1.00 | \$1,500 | \$1,500.00 |
| 03/18/2024 | Tanjila Sultana | Financial Analyst | Research client trading in iRhythm for filing and prepare Schedule A. | 03 | 1.50 | \$550 | \$825.00 |
| 03/19/2024 | Tanjila Sultana | Financial Analyst | Target client losses in iRhythm Technologies Inc. | 01 | 2.00 | \$550 | \$1,100.00 |
| 03/20/2024 | Matthew Mahady | Case Manager | Research Oklahoma Firefighters' PSLRA history and email summary to attorney; assist attorney with additional materials for draft lead plaintiff motion | 03 | 2.25 | \$450 | \$1,012.50 |
| 03/21/2024 | Amy Bitkower | Managing Director of Investigations | Updated list of potential witnesses | 01 | 0.25 | \$650 | \$162.50 |
| 03/21/2024 | Girolamo Brunetto | Associate | Researched and drafted LP brief. | 03 | 1.00 | \$875 | \$875.00 |
| 03/22/2024 | Girolamo Brunetto | Associate | Researched and drafted LP brief. | 03 | 7.50 | \$875 | \$6,562.50 |
| 03/23/2024 | Girolamo Brunetto | Associate | Researched and drafted LP brief. | 03 | 1.50 | \$875 | \$1,312.50 |
| 03/24/2024 | Girolamo Brunetto | Associate | Researched and drafted LP brief. | 03 | 1.50 | \$875 | \$1,312.50 |
| 03/25/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses, client certification | 03 | 1.00 | \$650 | \$650.00 |
| 03/25/2024 | Girolamo Brunetto | Associate | Researched and drafted LP brief. | 03 | 1.25 | \$875 | \$1,093.75 |
| 04/01/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses. Work on LP filing. Created file ready loss chart | 03 | 2.00 | \$650 | \$1,300.00 |
| 04/01/2024 | Girolamo Brunetto | Associate | Researched and drafted LP brief. | 03 | 3.75 | \$875 | \$3,281.25 |
| 04/02/2024 | Girolamo Brunetto | Associate | Reviewed and edited LP brief; circulated same internally. | 03 | 0.75 | \$875 | \$656.25 |
| 04/02/2024 | Katherine Sinderson | Partner | Review of LP brief | 03 | 1.00 | \$1,600 | \$1,600.00 |
| 04/02/2024 | Matthew Mahady | Case Manager | Proof/edit conflict check with Oklahoma Firefighters; review, edit and format draft lead plaintiff motion & brief | 03 | 1.00 | \$450 | \$450.00 |
| 04/03/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses; work on lead plaintiff briefing | 03 | 2.00 | \$650 | \$1,300.00 |
| 04/03/2024 | Girolamo Brunetto | Associate | Reviewed and edited LP brief. | 03 | 1.00 | \$875 | \$875.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-------------------------------------|--|-----------|-------|-------|------------|
| 04/04/2024 | Matthew Mahady | Case Manager | Email assignment to paralegal re: draft attorney declaration and proposed order for lead plaintiff motion; call with paralegal re: same; proof/edit drafts re: same; Email assignment to paralegal re: draft certificate of interested parties and attorney certifications for lead plaintiff motion; call with paralegal re: same | 03 | 2.00 | \$450 | \$900.00 |
| 04/05/2024 | Matthew Mahady | Case Manager | Proof/edit drafts of draft certificate of interested parties and attorney certifications for lead plaintiff motion; <u>review, edit and finalize exhibits;</u> | 03 | 1.50 | \$450 | \$675.00 |
| 04/08/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses; work on lead plaintiff briefing | 03 | 2.00 | \$650 | \$1,300.00 |
| 04/08/2024 | Girolamo Brunetto | Associate | Reviewed and edited LP papers; assisted in the <u>preparation of filing same.</u> | 03 | 1.00 | \$875 | \$875.00 |
| 04/08/2024 | Matthew Mahady | Case Manager | Proof, edit, and finalize lead plaintiff motion papers; review local and judge rules; coordinate with Los Angeles paralegal re: filing; draft iECF filing nstructions <u>for paralegal</u> | 03 | 8.75 | \$450 | \$3,937.50 |
| 04/09/2024 | Girolamo Brunetto | Associate | Reviewed and assembled materials to send to investigative team. | 01 | 0.50 | \$875 | \$437.50 |
| 04/09/2024 | Matthew Mahady | Case Manager | Organize and update files | 13 | 0.50 | \$450 | \$225.00 |
| 04/09/2024 | Matthew Mahady | Case Manager | Assist attorney with client update | 16 | 0.25 | \$450 | \$112.50 |
| 04/11/2024 | Amy Bitkower | Managing Director of Investigations | Online research; drafted cheat sheet; identify and <u>research potential witnesses for investigation</u> | 01 | 2.00 | \$650 | \$1,300.00 |
| 04/11/2024 | Matthew Mahady | Case Manager | Review and edit index of materials for transfer to <u>litigation team; email additional materials to paralegal</u> | 13 | 0.75 | \$450 | \$337.50 |
| 04/15/2024 | Matthew Mahady | Case Manager | Review and edit materials for transfer to litigation team and index | 13 | 0.75 | \$450 | \$337.50 |
| 04/16/2024 | Matthew Mahady | Case Manager | Assist attorney with response to defendants re: ADR <u>deadlines</u> | 13 | 0.75 | \$450 | \$337.50 |
| 04/18/2024 | Girolamo Brunetto | Associate | Reviewed and edited notice of unopposed LP motion and <u>circulated internally.</u> | 03 | 0.25 | \$875 | \$218.75 |
| 04/18/2024 | Khristine De Leon | Case Manager | Prepare draft of Notice of Unopposed LP Motion. | 03 | 1.00 | \$450 | \$450.00 |
| 04/22/2024 | Khristine De Leon | Case Manager | File Notice of Unopposed Lead Plaintiff Motion; circulate <u>same to team.</u> | 03 | 1.00 | \$450 | \$450.00 |
| 05/09/2024 | Cindy Bomzer-Stein | Case Manager | Review background materials | 01 | 2.25 | \$450 | \$1,012.50 |
| 05/09/2024 | Cindy Bomzer-Stein | Case Manager | Upload litigation materials and FOIA documents to SharePoint | 01 | 0.25 | \$450 | \$112.50 |
| 05/09/2024 | Cindy Bomzer-Stein | Case Manager | Communicate with Litigation Support regarding creating a case space and upload FOIA document production | 01 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|-------|------------|
| 05/09/2024 | Roberto Santamarina | Litigation Support | Setup relativity workspace and user group. Assign permissions as required. Process data into reviewable format and load to new workspace. Quality check for accuracy, run scripts, update index, and release. | 01 | 2.00 | \$525 | \$1,050.00 |
| 05/13/2024 | Cindy Bomzer-Stein | Case Manager | Review background materials | 01 | 1.50 | \$450 | \$675.00 |
| 05/13/2024 | Nicole Santoro | Associate | Read initial complaint and FOIA materials. | 01 | 1.50 | \$500 | \$750.00 |
| 05/15/2024 | Amy Bitkower | Managing Director of Investigations | Doc review; updated cheat sheet | 01 | 8.50 | \$650 | \$5,525.00 |
| 05/15/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve background materials and organize into binders for K. Sinderson | 01 | 1.00 | \$450 | \$450.00 |
| 05/15/2024 | Khristine De Leon | Case Manager | Pull and circulate LP order. | 03 | 0.25 | \$450 | \$112.50 |
| 05/15/2024 | Laura Marvelli | Senior Investigator | Locate potential witnesses and conduct outreach calls regarding iRhythm investigation | 01 | 5.50 | \$500 | \$2,750.00 |
| 05/15/2024 | Nicole Santoro | Associate | Drafted FOIA requests for the FDA regarding iRhythm; reviewed existing FOIA production. | 01 | 2.75 | \$500 | \$1,375.00 |
| 05/16/2024 | Amy Bitkower | Managing Director of Investigations | Identify potential witnesses; review documents for investigation | 01 | 1.25 | \$650 | \$812.50 |
| 05/16/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve background factual materials | 01 | 2.75 | \$450 | \$1,237.50 |
| 05/16/2024 | Cindy Bomzer-Stein | Case Manager | Draft pro hac vice applications for J. Rizio-Hamilton, K. Sinderson and N. Santoro | 13 | 1.00 | \$450 | \$450.00 |
| 05/16/2024 | Janielle Lattimore | Assistant Managing Clerk | Discuss pending pro hac vice motions with paralegal; Electronic filing of pro hac vice motion for partner | 13 | 1.25 | \$475 | \$593.75 |
| 05/16/2024 | Laura Marvelli | Senior Investigator | Calls to leads, interview, adjustments to cheat sheet | 01 | 8.00 | \$500 | \$4,000.00 |
| 05/16/2024 | Mahiri Buffong | Managing Clerk | Reviewed case profile discussed updates with docket clerk. | 13 | 0.50 | \$500 | \$250.00 |
| 05/17/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve background factual materials | 01 | 2.50 | \$450 | \$1,125.00 |
| 05/17/2024 | Laura Marvelli | Senior Investigator | Locating leads, setting up LinkedIn searches for potential leads | 01 | 2.50 | \$500 | \$1,250.00 |
| 05/20/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with director of paralegals regarding payments for pro hac vice filing and subpoena service | 13 | 0.25 | \$475 | \$118.75 |
| 05/20/2024 | Laura Marvelli | Senior Investigator | Calls to potential witnesses, interviewing witnesses | 01 | 6.25 | \$500 | \$3,125.00 |
| 05/20/2024 | Nicole Santoro | Associate | Discussed status of FOIA requests with K. Sinderson; researched the same. | 01 | 0.25 | \$500 | \$125.00 |
| 05/21/2024 | Jessica Lacon | Docket Clerk | Docketing all documents to court alert, update case profile | 13 | 1.00 | \$450 | \$450.00 |
| 05/21/2024 | Laura Marvelli | Senior Investigator | Calls to potential witnesses, interview | 01 | 3.00 | \$500 | \$1,500.00 |
| 05/21/2024 | Laura Marvelli | Senior Investigator | Outreach call to potential witnesses regarding iRhythm investigation | 01 | 3.50 | \$500 | \$1,750.00 |
| 05/21/2024 | Nicole Santoro | Associate | Drafted email to FOIA regarding request. | 01 | 0.50 | \$500 | \$250.00 |
| 05/22/2024 | Laura Marvelli | Senior Investigator | Calls to potential witnesses; memo re same | 01 | 7.25 | \$500 | \$3,625.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-------------------------------------|--|-----------|-------|-------|------------|
| 05/22/2024 | Nicole Santoro | Associate | Corresponded with FOIA offices regarding requests to FDA; analyzed outstanding requests; discussed same with K. Sinderson. | 01 | 1.00 | \$500 | \$500.00 |
| 05/23/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed Laura Marvelli's investigation memo; online research; identify and research potential witnesses for investigation | 01 | 2.00 | \$650 | \$1,300.00 |
| 05/23/2024 | Laura Marvelli | Senior Investigator | Memo re investigation, locate potential witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 05/24/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 0.25 | \$650 | \$162.50 |
| 05/24/2024 | Laura Marvelli | Senior Investigator | Locating potential witnesses, LinkedIn searches | 01 | 7.50 | \$500 | \$3,750.00 |
| 05/24/2024 | Nicole Santoro | Associate | Read emails with defense counsel about complaint and motion to dismiss scheduling. | 13 | 0.25 | \$500 | \$125.00 |
| 05/28/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 0.25 | \$650 | \$162.50 |
| 05/28/2024 | Cindy Bomzer-Stein | Case Manager | Draft joint stipulation and proposed order regarding motion to dismiss and amended complaint deadlines | 13 | 1.75 | \$450 | \$787.50 |
| 05/28/2024 | Cindy Bomzer-Stein | Case Manager | Finalize pro hac vice applications for K. Sinderson and N. Santoro | 13 | 0.25 | \$450 | \$112.50 |
| 05/28/2024 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, registered attorney for Pacer credentials, filed and docketed documents. Corresponded with team re anticipated filing. | 13 | 2.75 | \$500 | \$1,375.00 |
| 05/28/2024 | Nicole Santoro | Associate | Drafted a stipulation for amended complaint deadline and case schedule; reviewed pro hac vice motions. | 13 | 2.00 | \$500 | \$1,000.00 |
| 05/29/2024 | Cindy Bomzer-Stein | Case Manager | Format stipulation regarding amended complaint and motion to dismiss deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 05/29/2024 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, filed documents, docketed and calendared events. | 13 | 2.50 | \$500 | \$1,250.00 |
| 05/29/2024 | Nicole Santoro | Associate | Edited stipulation for motion to dismiss and complaint deadlines; filed the same. | 13 | 1.25 | \$500 | \$625.00 |
| 05/30/2024 | Andrew Boruch | Senior Staff Attorney | Review iRhythm prep material; search iRhythm public documents/videos. | 01 | 7.50 | \$525 | \$3,937.50 |
| 05/30/2024 | Nicole Santoro | Associate | Reviewed correspondence from FOIA; drafted correspondence to FOIA FDA office. | 01 | 0.50 | \$500 | \$250.00 |
| 05/30/2024 | Nicole Santoro | Associate | Call with case team regarding drafting the amended complaint. | 04 | 0.50 | \$500 | \$250.00 |
| 05/30/2024 | Nicole Santoro | Associate | Call with case team regarding FOIA discovery efforts. | 01 | 0.50 | \$500 | \$250.00 |
| 05/31/2024 | Andrew Boruch | Senior Staff Attorney | Review iRhythm prep material; search iRhythm public documents/videos. | 01 | 8.25 | \$525 | \$4,331.25 |
| 06/03/2024 | Andrew Boruch | Senior Staff Attorney | Review iRhythm prep material; search iRhythm public documents/videos. | 01 | 8.00 | \$525 | \$4,200.00 |
| 06/04/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 1.00 | \$650 | \$650.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|------------|
| 06/04/2024 | Andrew Boruch | Senior Staff Attorney | Review iRhythm prep material; search iRhythm public documents/videos. | 01 | 8.50 | \$525 | \$4,462.50 |
| 06/04/2024 | Laura Marvelli | Senior Investigator | Calls, case review, LinkedIn searches | 01 | 7.50 | \$500 | \$3,750.00 |
| 06/04/2024 | Nicole Santoro | Associate | Discussed amended complaint drafting with K. Sindersonn. | 04 | 0.25 | \$500 | \$125.00 |
| 06/05/2024 | Amy Bitkower | Managing Director of Investigations | Managed investigation; identify and research potential witnesses for investigation | 01 | 0.50 | \$650 | \$325.00 |
| 06/05/2024 | Laura Marvelli | Senior Investigator | Calls to potential witnesses, interviews | 01 | 8.25 | \$500 | \$4,125.00 |
| 06/05/2024 | Nicole Santoro | Associate | Worked on amended complaint drafting. | 04 | 1.00 | \$500 | \$500.00 |
| 06/06/2024 | Cindy Bomzer-Stein | Case Manager | Create binder of conference and hearing transcripts for N. Santoro | 01 | 1.25 | \$450 | \$562.50 |
| 06/06/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation, conduct interviews; starting memo summarizing interviews | 01 | 7.75 | \$500 | \$3,875.00 |
| 06/06/2024 | Nicole Santoro | Associate | Analyzed potential false statements for amended complaint; read company filings. | 04 | 1.50 | \$500 | \$750.00 |
| 06/07/2024 | Laura Marvelli | Senior Investigator | Working on interview memo; identify and research potential witnesses for investigation | 01 | 8.00 | \$500 | \$4,000.00 |
| 06/07/2024 | Nicole Santoro | Associate | Analyzed potential false statements for amended complaint; read company filings. | 04 | 4.00 | \$500 | \$2,000.00 |
| 06/09/2024 | Katherine Sinderson | Partner | Planning for amended complaint | 04 | 0.75 | \$1,600 | \$1,200.00 |
| 06/09/2024 | Nicole Santoro | Associate | Analyzed potential false statements for amended complaint; read company filings. | 04 | 8.00 | \$500 | \$4,000.00 |
| 06/10/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed Laura Marvelli's interview memo | 01 | 1.00 | \$650 | \$650.00 |
| 06/10/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve conference transcripts from Bloomberg Terminal | 01 | 0.25 | \$450 | \$112.50 |
| 06/10/2024 | Jacob Foster | Investigator | Saved searches and iRhythm linkedin checks | 01 | 7.00 | \$400 | \$2,800.00 |
| 06/10/2024 | Laura Marvelli | Senior Investigator | Finishing interview memo, edits, calls | 01 | 8.00 | \$500 | \$4,000.00 |
| 06/10/2024 | Nicole Santoro | Associate | Analyzed potential false statements for amended complaint; read company filings. | 04 | 7.00 | \$500 | \$3,500.00 |
| 06/11/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation, conduct interviews with potential witnesses | 01 | 7.25 | \$500 | \$3,625.00 |
| 06/11/2024 | Nicole Santoro | Associate | Worked on identifying false statements; worked on complaint outline. | 04 | 0.50 | \$500 | \$250.00 |
| 06/12/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation | 01 | 5.50 | \$500 | \$2,750.00 |
| 06/13/2024 | Laura Marvelli | Senior Investigator | Calls to potential witnesses, interviews | 01 | 7.00 | \$500 | \$3,500.00 |
| 06/14/2024 | Laura Marvelli | Senior Investigator | Calls to potential witnesses, locate potential witnesses, LinkedIn searches | 01 | 7.50 | \$500 | \$3,750.00 |
| 06/14/2024 | Nicole Santoro | Associate | Corresponded with prospective expert to consult on complaint. | 11 | 0.25 | \$500 | \$125.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|------------|
| 06/14/2024 | Nicole Santoro | Associate | Read SEC filings for drafting the complaint. | 04 | 1.00 | \$500 | \$500.00 |
| 06/17/2024 | Cindy Bomzer-Stein | Case Manager | Send background materials to litigation support for upload to Relativity | 01 | 0.25 | \$450 | \$112.50 |
| 06/17/2024 | Laura Marvelli | Senior Investigator | Investigation memo | 01 | 8.00 | \$500 | \$4,000.00 |
| 06/17/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 1.00 | \$500 | \$500.00 |
| 06/18/2024 | Laura Marvelli | Senior Investigator | Finishing investigation memo | 01 | 3.00 | \$500 | \$1,500.00 |
| 06/18/2024 | Nicole Santoro | Associate | Worked on drafting amended complaint. | 04 | 0.50 | \$500 | \$250.00 |
| 06/18/2024 | Roberto Santamarina | Litigation Support | Download, organize, and process of Background data from SharePoint into reviewable format. Load to Relativity, perform load quality control, run scripts, analytics, and update index. | 01 | 1.50 | \$525 | \$787.50 |
| 06/19/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 2.00 | \$500 | \$1,000.00 |
| 06/20/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed Laura Marvelli's interview memo | 01 | 1.50 | \$650 | \$975.00 |
| 06/20/2024 | Cindy Bomzer-Stein | Case Manager | Create shell document regarding amended complaint | 04 | 0.50 | \$450 | \$225.00 |
| 06/20/2024 | Katherine Sinderson | Partner | Emails with client | 16 | 0.50 | \$1,600 | \$800.00 |
| 06/20/2024 | Katherine Sinderson | Partner | Review of allegations | 04 | 1.00 | \$1,600 | \$1,600.00 |
| 06/20/2024 | Laura Marvelli | Senior Investigator | Editing & circulating investigation memo, calls to potential witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 06/20/2024 | Nicole Santoro | Associate | Emailed with third party company about finding an expert; emailed with prospective expert | 11 | 0.50 | \$500 | \$250.00 |
| 06/20/2024 | Nicole Santoro | Associate | Worked on drafting amended complaint | 04 | 2.50 | \$500 | \$1,250.00 |
| 06/21/2024 | Katherine Sinderson | Partner | Correspondence regarding potential expert witness retention for securities claims | 11 | 0.50 | \$1,600 | \$800.00 |
| 06/21/2024 | Katherine Sinderson | Partner | Call/email with T. Sperber re work on amended complaint | 04 | 0.25 | \$1,600 | \$400.00 |
| 06/21/2024 | Laura Marvelli | Senior Investigator | Research possible witnesses on LinkedIn, calls to potential witnesses | 01 | 3.75 | \$500 | \$1,875.00 |
| 06/21/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 7.25 | \$500 | \$3,625.00 |
| 06/21/2024 | Thomas Sperber | Associate | Onboarding meeting; begin research and review of relevant materials | 04 | 1.75 | \$875 | \$1,531.25 |
| 06/22/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint; discussed same with case team. | 04 | 1.00 | \$500 | \$500.00 |
| 06/23/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint; discussed same with case team. | 04 | 2.00 | \$500 | \$1,000.00 |
| 06/24/2024 | Cindy Bomzer-Stein | Case Manager | Search, distribute and upload to Relativity and SharePoint background materials from Bloomberg terminal | 01 | 4.00 | \$450 | \$1,800.00 |
| 06/24/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses; interview witnesses; locate contact information for former employees | 01 | 8.00 | \$500 | \$4,000.00 |
| 06/24/2024 | Nicole Santoro | Associate | Corresponded with FDA FOIA office; analyzed status of productions. | 01 | 0.50 | \$500 | \$250.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|------------|
| 06/24/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint; discussed same with case team. | 04 | 1.50 | \$500 | \$750.00 |
| 06/24/2024 | Paul Charlotin | Litigation Support | Downloaded, processed and released provided PDF data | 13 | 1.50 | \$475 | \$712.50 |
| 06/24/2024 | Thomas Sperber | Associate | Research for amended complaint | 04 | 1.50 | \$875 | \$1,312.50 |
| 06/25/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve additional analyst reports for amended complaint | 04 | 0.75 | \$450 | \$337.50 |
| 06/25/2024 | Katherine Sinderson | Partner | Correspondence regarding potential expert witness for electrocardiograph technology | 11 | 0.50 | \$1,600 | \$800.00 |
| 06/25/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses; locate contact information for former employees | 01 | 2.00 | \$500 | \$1,000.00 |
| 06/25/2024 | Nicole Santoro | Associate | Analyzed potential expert resumes; discussed same with case team. | 11 | 0.50 | \$500 | \$250.00 |
| 06/25/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint; discussed same with case team. | 04 | 3.00 | \$500 | \$1,500.00 |
| 06/25/2024 | Thomas Sperber | Associate | Review analyst reports and company statements for use in complaint draft | 04 | 6.00 | \$875 | \$5,250.00 |
| 06/26/2024 | Katherine Sinderson | Partner | Meeting with possible expert, emails re same | 11 | 1.00 | \$1,600 | \$1,600.00 |
| 06/26/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation | 01 | 1.75 | \$500 | \$875.00 |
| 06/26/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket and email and updated case profile. | 13 | 0.50 | \$500 | \$250.00 |
| 06/26/2024 | Nicole Santoro | Associate | Met with prospective consultant for complaint; discussed same with case team. | 11 | 1.25 | \$500 | \$625.00 |
| 06/26/2024 | Nicole Santoro | Associate | Called Center for Devices and Radiological Health FOIA office to follow up on request. | 01 | 0.25 | \$500 | \$125.00 |
| 06/26/2024 | Nicole Santoro | Associate | Worked on drafting amended complaint. | 04 | 1.75 | \$500 | \$875.00 |
| 06/26/2024 | Thomas Sperber | Associate | Meet with prospective expert | 11 | 0.75 | \$875 | \$656.25 |
| 06/26/2024 | Thomas Sperber | Associate | Work on complaint draft | 04 | 0.75 | \$875 | \$656.25 |
| 06/27/2024 | Katherine Sinderson | Partner | Emails and review re expert retention | 11 | 0.75 | \$1,600 | \$1,200.00 |
| 06/27/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation; interviews with witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 06/27/2024 | Nicole Santoro | Associate | Worked on drafting amended complaint. | 04 | 2.25 | \$500 | \$1,125.00 |
| 06/27/2024 | Thomas Sperber | Associate | Work on complaint draft and research | 04 | 9.50 | \$875 | \$8,312.50 |
| 06/28/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 0.25 | \$650 | \$162.50 |
| 06/28/2024 | Katherine Sinderson | Partner | Draft complaint | 04 | 4.75 | \$1,600 | \$7,600.00 |
| 06/28/2024 | Katherine Sinderson | Partner | Work with expert | 11 | 1.00 | \$1,600 | \$1,600.00 |
| 06/28/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation, interviews with witnesses, LinkedIn searches to identify potential witnesses | 01 | 7.50 | \$500 | \$3,750.00 |
| 06/28/2024 | Nicole Santoro | Associate | Worked on drafting amended complaint. | 04 | 3.50 | \$500 | \$1,750.00 |
| 06/28/2024 | Nicole Santoro | Associate | Met with consultant regarding facts and theory for complaint drafting. | 11 | 1.00 | \$500 | \$500.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|------------|
| 06/28/2024 | Thomas Sperber | Associate | Call with expert witness re: electrocardiograph technology | 11 | 1.00 | \$875 | \$875.00 |
| 06/28/2024 | Thomas Sperber | Associate | Work on complaint draft; research re: complaint | 04 | 5.25 | \$875 | \$4,593.75 |
| 06/29/2024 | Nicole Santoro | Associate | Worked on drafting amended complaint. | 04 | 8.00 | \$500 | \$4,000.00 |
| 06/30/2024 | Katherine Sinderson | Partner | Research and amended complaint | 04 | 3.00 | \$1,600 | \$4,800.00 |
| 06/30/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 2.00 | \$500 | \$1,000.00 |
| 06/30/2024 | Thomas Sperber | Associate | Research re: complaint; work on complaint draft | 04 | 4.50 | \$875 | \$3,937.50 |
| 07/01/2024 | Katherine Sinderson | Partner | Research and amended complaint | 04 | 6.00 | \$1,600 | \$9,600.00 |
| 07/01/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation; interviews with witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 07/01/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 7.25 | \$500 | \$3,625.00 |
| 07/02/2024 | Cindy Bomzer-Stein | Case Manager | Find recent examples of amended complaints filed in the Northern District of California | 04 | 1.75 | \$450 | \$787.50 |
| 07/02/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve additional SEC filings regarding amended complaint | 04 | 0.50 | \$450 | \$225.00 |
| 07/02/2024 | Katherine Sinderson | Partner | Research and amended complaint | 04 | 6.00 | \$1,600 | \$9,600.00 |
| 07/02/2024 | Katherine Sinderson | Partner | Conference call with expert witness regarding electrocardiograph technology for amended complaint | 11 | 0.75 | \$1,600 | \$1,200.00 |
| 07/02/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation; interviews with witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 07/02/2024 | Nicole Santoro | Associate | Call with expert regarding complaint. | 11 | 1.00 | \$500 | \$500.00 |
| 07/02/2024 | Nicole Santoro | Associate | Discussed complaint drafting with case team. | 04 | 0.50 | \$500 | \$250.00 |
| 07/02/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 3.75 | \$500 | \$1,875.00 |
| 07/03/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed L. Marvelli's interview memo; identify and research potential witnesses for investigation | 01 | 1.00 | \$650 | \$650.00 |
| 07/03/2024 | Katherine Sinderson | Partner | Research and amended complaint | 04 | 1.50 | \$1,600 | \$2,400.00 |
| 07/03/2024 | Katherine Sinderson | Partner | Call with expert to discuss complaint | 11 | 0.50 | \$1,600 | \$800.00 |
| 07/03/2024 | Laura Marvelli | Senior Investigator | Drafting memo summarizing interview, locating potential witnesses, research into potential witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 07/03/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 1.75 | \$500 | \$875.00 |
| 07/06/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint | 04 | 0.50 | \$500 | \$250.00 |
| 07/08/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed L. Marvelli's memo; atty conf | 01 | 1.00 | \$650 | \$650.00 |
| 07/08/2024 | Andrew Boruch | Senior Staff Attorney | Review of pre-class period analyst reports. | 01 | 6.25 | \$525 | \$3,281.25 |
| 07/08/2024 | Cindy Bomzer-Stein | Case Manager | Set up Westlaw alerts regarding iRhythm | 15 | 0.50 | \$450 | \$225.00 |
| 07/08/2024 | Katherine Sinderson | Partner | Research and amended complaint | 04 | 3.25 | \$1,600 | \$5,200.00 |
| 07/08/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint; meeting with case team regarding the same | 04 | 5.00 | \$500 | \$2,500.00 |
| 07/08/2024 | Thomas Sperber | Associate | Complaint drafting and research; call with K. Sinderson and N. Santoro re same. | 04 | 5.25 | \$875 | \$4,593.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|-------------|
| 07/09/2024 | Andrew Boruch | Senior Staff Attorney | Pre-class period analyst report review, summary, and follow-up. | 01 | 5.25 | \$525 | \$2,756.25 |
| 07/09/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve analyst reports from Eikon for amended complaint | 04 | 1.00 | \$450 | \$450.00 |
| 07/09/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with docket clerk regarding case tracking request | 13 | 0.25 | \$475 | \$118.75 |
| 07/09/2024 | Jessica Lacon | Docket Clerk | Initiate case tracking on 3:24-cv-03967 and 1:24-cv-00593 for C. Bomzer-Stein, N. Santoro, and T. Sperber | 13 | 1.00 | \$450 | \$450.00 |
| 07/09/2024 | Katherine Sinderson | Partner | Reviewing draft Complaint | 04 | 2.50 | \$1,600 | \$4,000.00 |
| 07/09/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation; interviews with witnesses | 01 | 7.25 | \$500 | \$3,625.00 |
| 07/09/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint | 04 | 5.25 | \$500 | \$2,625.00 |
| 07/09/2024 | Thomas Sperber | Associate | Work on complaint | 04 | 3.50 | \$875 | \$3,062.50 |
| 07/10/2024 | Andrew Boruch | Senior Staff Attorney | Review of analyst reports. | 01 | 4.25 | \$525 | \$2,231.25 |
| 07/10/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve cited materials regarding amended complaint | 04 | 1.50 | \$450 | \$675.00 |
| 07/10/2024 | Cindy Bomzer-Stein | Case Manager | Review filing plan regarding amended complaint | 04 | 0.25 | \$450 | \$112.50 |
| 07/10/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve analyst reports from Eikon for amended complaint | 04 | 0.50 | \$450 | \$225.00 |
| 07/10/2024 | Janielle Lattimore | Assistant Managing Clerk | Review rules, procedures, and docket, prepare filing plan for amended complaint, Discussions regarding scheduling filing plan meeting. | 04 | 1.75 | \$475 | \$831.25 |
| 07/10/2024 | Jessica Lacon | Docket Clerk | Updating case profile. | 13 | 0.25 | \$450 | \$112.50 |
| 07/10/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation; identify and research potential witnesses for investigation | 01 | 6.75 | \$500 | \$3,375.00 |
| 07/10/2024 | Mahiri Buffong | Managing Clerk | Updated case profile. | 13 | 0.50 | \$500 | \$250.00 |
| 07/10/2024 | Nicole Santoro | Associate | Discussed complaint filing plan with managing clerks. | 04 | 0.25 | \$500 | \$125.00 |
| 07/10/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 8.25 | \$500 | \$4,125.00 |
| 07/10/2024 | Thomas Sperber | Associate | Complaint drafting and research | 04 | 3.50 | \$875 | \$3,062.50 |
| 07/11/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation; assisted L. Marvelli with investigation. | 01 | 6.00 | \$650 | \$3,900.00 |
| 07/11/2024 | Andrew Boruch | Senior Staff Attorney | Review of executive compensation of named defendants. | 01 | 6.25 | \$525 | \$3,281.25 |
| 07/11/2024 | Cindy Bomzer-Stein | Case Manager | Attend filing plan meeting regarding amended complaint | 04 | 0.25 | \$450 | \$112.50 |
| 07/11/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve cited materials regarding amended complaint | 04 | 5.25 | \$450 | \$2,362.50 |
| 07/11/2024 | Janielle Lattimore | Assistant Managing Clerk | Filing plan meeting and revisions to filing plan | 04 | 1.25 | \$475 | \$593.75 |
| 07/11/2024 | Katherine Sinderson | Partner | Reviewing draft amended complaint/source materials | 04 | 8.00 | \$1,600 | \$12,800.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|-------------|
| 07/11/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation; drafting memo summarizing interviews | 01 | 7.75 | \$500 | \$3,875.00 |
| 07/11/2024 | Mahiri Buffong | Managing Clerk | Hosted filing plan meeting. | 04 | 0.50 | \$500 | \$250.00 |
| 07/11/2024 | Nicole Santoro | Associate | Discussed complaint filing plan with case team. | 04 | 0.25 | \$500 | \$125.00 |
| 07/11/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 2.00 | \$500 | \$1,000.00 |
| 07/11/2024 | Thomas Sperber | Associate | Complaint drafting and liaising with staff attorney; call to discuss filing plan | 04 | 6.50 | \$875 | \$5,687.50 |
| 07/12/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation; assisted L. Marvelli with investigation. | 01 | 5.00 | \$650 | \$3,250.00 |
| 07/12/2024 | Andrew Boruch | Senior Staff Attorney | Review of executive compensation and awards. | 01 | 4.75 | \$525 | \$2,493.75 |
| 07/12/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve cited materials regarding amended complaint | 04 | 1.00 | \$450 | \$450.00 |
| 07/12/2024 | Jacob Foster | Investigator | iRhythm contact info searches | 01 | 2.50 | \$400 | \$1,000.00 |
| 07/12/2024 | Katherine Sinderson | Partner | Reviewing draft amended complaint | 04 | 9.00 | \$1,600 | \$14,400.00 |
| 07/12/2024 | Laura Marvelli | Senior Investigator | Drafting memo summarising interviews, outreach calls to potential witnesses, interview with witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 07/12/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint. | 04 | 3.00 | \$500 | \$1,500.00 |
| 07/12/2024 | Roberto Santamarina | Litigation Support | Capture of video from YouTube. | 01 | 0.50 | \$525 | \$262.50 |
| 07/12/2024 | Thomas Sperber | Associate | Complaint drafting and research; team meeting re same | 04 | 8.00 | \$875 | \$7,000.00 |
| 07/13/2024 | Katherine Sinderson | Partner | Reviewing draft amended complaint | 04 | 4.00 | \$1,600 | \$6,400.00 |
| 07/13/2024 | Thomas Sperber | Associate | Complaint drafting and research | 04 | 3.00 | \$875 | \$2,625.00 |
| 07/14/2024 | Katherine Sinderson | Partner | Reviewing draft amended complaint | 04 | 4.75 | \$1,600 | \$7,600.00 |
| 07/14/2024 | Thomas Sperber | Associate | Complaint drafting | 04 | 3.50 | \$875 | \$3,062.50 |
| 07/15/2024 | Cindy Bomzer-Stein | Case Manager | Cite check amended complaint | 04 | 1.50 | \$450 | \$675.00 |
| 07/15/2024 | Jacob Foster | Investigator | iRhythm contact info searches | 01 | 7.00 | \$400 | \$2,800.00 |
| 07/15/2024 | Katherine Sinderson | Partner | Reviewing draft amended complaint | 04 | 9.00 | \$1,600 | \$14,400.00 |
| 07/15/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses, locate potential witnesses, reach outs for conformation calls | 01 | 8.25 | \$500 | \$4,125.00 |
| 07/15/2024 | Thomas Sperber | Associate | Complaint drafting and research | 04 | 10.75 | \$875 | \$9,406.25 |
| 07/16/2024 | Andrew Boruch | Senior Staff Attorney | Research and draft report on defendant compensation. | 01 | 4.50 | \$525 | \$2,362.50 |
| 07/16/2024 | Cindy Bomzer-Stein | Case Manager | Cite check amended complaint | 04 | 7.00 | \$450 | \$3,150.00 |
| 07/16/2024 | Jacob Foster | Investigator | iRhythm contact info searches | 01 | 3.50 | \$400 | \$1,400.00 |
| 07/16/2024 | Katherine Sinderson | Partner | Reviewing draft amended complaint | 04 | 9.25 | \$1,600 | \$14,800.00 |
| 07/16/2024 | Laura Marvelli | Senior Investigator | Calls to potential witnesses, interviews, attempts at conf. call | 01 | 8.50 | \$500 | \$4,250.00 |
| 07/16/2024 | Mahiri Buffong | Managing Clerk | Attempted to reach out to court clerk re redline. | 04 | 1.00 | \$500 | \$500.00 |
| 07/16/2024 | Thomas Sperber | Associate | Work on amended complaint due Friday; on-call for former employee to call back | 04 | 5.50 | \$875 | \$4,812.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|-------------|
| 07/17/2024 | Cindy Bomzer-Stein | Case Manager | Review complaint materials regarding amended complaint | 04 | 1.50 | \$450 | \$675.00 |
| 07/17/2024 | Cindy Bomzer-Stein | Case Manager | Cite check amended complaint | 04 | 6.00 | \$450 | \$2,700.00 |
| 07/17/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case team regarding potential updates to filing plan and estimated time of filing | 04 | 0.75 | \$475 | \$356.25 |
| 07/17/2024 | John Rizio-Hamilton | Partner | Amended complaint | 04 | 9.00 | \$1,800 | \$16,200.00 |
| 07/17/2024 | Laura Marvelli | Senior Investigator | Drafting memo summarizing interviews, edits to same, attempts to contact potential witnesses, interview | 01 | 7.00 | \$500 | \$3,500.00 |
| 07/17/2024 | Mahiri Buffong | Managing Clerk | Attempted to reach out to court clerk re redline. Corresponded with team re options. Discussion with Assistant Managing Clerk re filing plan. | 04 | 2.50 | \$500 | \$1,250.00 |
| 07/17/2024 | Thomas Sperber | Associate | Work on complaint due upcoming friday | 04 | 5.50 | \$875 | \$4,812.50 |
| 07/18/2024 | Cindy Bomzer-Stein | Case Manager | Research factual documents regarding Amended Complaint | 04 | 1.00 | \$450 | \$450.00 |
| 07/18/2024 | Cindy Bomzer-Stein | Case Manager | Draft lead plaintiff certifications for team | 04 | 1.50 | \$450 | \$675.00 |
| 07/18/2024 | Cindy Bomzer-Stein | Case Manager | Finalize pro hac vice application for T. Sperber | 13 | 0.75 | \$450 | \$337.50 |
| 07/18/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associates regarding updates to amended complaint filing plan; discuss requirements for filing certifications for associates and partner | 04 | 2.00 | \$475 | \$950.00 |
| 07/18/2024 | Janielle Lattimore | Assistant Managing Clerk | Electronic filing of pro hac vice motion for associate | 13 | 0.50 | \$475 | \$237.50 |
| 07/18/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 07/18/2024 | Katherine Sinderson | Partner | Reviewing draft amended complaint | 04 | 2.00 | \$1,600 | \$3,200.00 |
| 07/18/2024 | Laura Marvelli | Senior Investigator | Last calls to potential witnesses, interview memo, attempts at conference calls with attorneys | 01 | 8.25 | \$500 | \$4,125.00 |
| 07/18/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket, docketed documents and calendared events. Reviewed rules for submission of certification of counsel, document for filing compliance, filed documents. | 13 | 3.75 | \$500 | \$1,875.00 |
| 07/18/2024 | Thomas Sperber | Associate | Work on amended complaint due following day | 04 | 9.00 | \$875 | \$7,875.00 |
| 07/19/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed Laura Marvelli's investigation memo | 01 | 0.50 | \$650 | \$325.00 |
| 07/19/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associate regarding attachments for pending complaint filing; Revise and circulate updated filing plan to case team; Correspond with associate regarding courtesy copy requirements and estimated time of filing; Review exhibits; Electronic filing of amended complaint | 04 | 2.50 | \$475 | \$1,187.50 |
| 07/19/2024 | Jessica Lacon | Docket Clerk | Filing complaint; calling the court re filing. | 04 | 0.75 | \$450 | \$337.50 |
| 07/19/2024 | Laura Marvelli | Senior Investigator | Work on memo summarizing interviews; calls to potential witnesses; notes re same | 01 | 7.25 | \$500 | \$3,625.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|------------|
| 07/19/2024 | Thomas Sperber | Associate | Finalize and file complaint | 04 | 9.50 | \$875 | \$8,312.50 |
| 07/22/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associate regarding pending filing of summons or waiver of service of summons | 04 | 0.50 | \$475 | \$237.50 |
| 07/23/2024 | Thomas Sperber | Associate | Research service of process for newly added defendants to amended complaint; draft and send email to defendants re: accepting service of process of new defs | 04 | 0.75 | \$875 | \$656.25 |
| 07/25/2024 | Mahiri Buffong | Managing Clerk | Reviewed rules and procedures for correcting an erroneously filed document, corresponded with associate re options for corrections. | 04 | 1.75 | \$500 | \$875.00 |
| 07/26/2024 | Cindy Bomzer-Stein | Case Manager | Search for exemplars regarding requests to seal a non-confidential document | 04 | 1.00 | \$450 | \$450.00 |
| 07/29/2024 | Cindy Bomzer-Stein | Case Manager | Upload FOIA request production to SharePoint | 01 | 0.25 | \$450 | \$112.50 |
| 07/29/2024 | Katherine Sinderson | Partner | Discuss FOIA documents with N. Santoro | 01 | 1.00 | \$1,600 | \$1,600.00 |
| 07/29/2024 | Nicole Santoro | Associate | Emailed with FOIA representative; analyzed documents from FOIA request | 01 | 1.00 | \$500 | \$500.00 |
| 07/29/2024 | Thomas Sperber | Associate | Work with MCO to analyze options for portion of complaint defendants ask to be redacted; respond to defendants re: same | 04 | 0.50 | \$875 | \$437.50 |
| 07/30/2024 | Mahiri Buffong | Managing Clerk | Reviewed and confirmed rules for submission of documents for correction of confidentially filed documents. | 04 | 1.25 | \$500 | \$625.00 |
| 07/31/2024 | Cindy Bomzer-Stein | Case Manager | Upload FOIA request production to iManage and Relativity | 01 | 0.25 | \$450 | \$112.50 |
| 07/31/2024 | Katherine Sinderson | Partner | Discussion re complaint | 04 | 0.50 | \$1,600 | \$800.00 |
| 07/31/2024 | Roberto Santamarina | Litigation Support | Download, organize, and process of 2024-07-29 FDA FOIA Production documents into reviewable format. Quality check processed data and load to relativity. Update index, run scripts and analytics, and release. | 01 | 1.00 | \$525 | \$525.00 |
| 07/31/2024 | Thomas Sperber | Associate | Complaint filing process postmortem with K. Sinderson | 04 | 0.50 | \$875 | \$437.50 |
| 08/01/2024 | Thomas Sperber | Associate | Review Defs' proposed redacted version of complaint; liaise with defense counsel on contacting court | 04 | 0.75 | \$875 | \$656.25 |
| 08/02/2024 | Katherine Sinderson | Partner | Analysis of new info for pleadings; under seal | 14 | 2.00 | \$1,600 | \$3,200.00 |
| 08/02/2024 | Nicole Santoro | Associate | Analyzed new public disclosures from iRhythm. | 14 | 1.50 | \$500 | \$750.00 |
| 08/02/2024 | Thomas Sperber | Associate | Pull and analyze post-complaint disclosures and stock price movements in consideration of whether to amend in light of new revelations | 14 | 4.00 | \$875 | \$3,500.00 |
| 08/05/2024 | Nicole Santoro | Associate | FOIA letter | 01 | 0.75 | \$500 | \$375.00 |
| 08/05/2024 | Thomas Sperber | Associate | Follow-up with opposing counsel re: service of process of new defendants; liaise with staff attorneys and paralegals re: review of new analyst reports | 04 | 0.25 | \$875 | \$218.75 |
| 08/06/2024 | Andrew Boruch | Senior Staff Attorney | Review and summary of analyst reports around large stock drops. | 01 | 10.25 | \$525 | \$5,381.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|------------|
| 08/06/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve recent analyst reports from Eikon | 15 | 0.50 | \$450 | \$225.00 |
| 08/06/2024 | Nicole Santoro | Associate | FOIA correspondence; discussed analysis of recent iRhythm news with case team. | 01 | 0.50 | \$500 | \$250.00 |
| 08/07/2024 | Andrew Boruch | Senior Staff Attorney | Review and summary of quarterly filings, press releases, and FDA 501K decisions. | 01 | 8.75 | \$525 | \$4,593.75 |
| 08/07/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve filings regarding related Department of Justice case | 01 | 0.50 | \$450 | \$225.00 |
| 08/07/2024 | Katherine Sinderson | Partner | Discussing amendment | 04 | 0.50 | \$1,600 | \$800.00 |
| 08/07/2024 | Nicole Santoro | Associate | Researched potential amendment | 04 | 3.25 | \$500 | \$1,625.00 |
| 08/07/2024 | Thomas Sperber | Associate | Meeting to discuss possible amendment; conduct research re: adding corrective disclosure | 04 | 1.25 | \$875 | \$1,093.75 |
| 08/08/2024 | Andrew Boruch | Senior Staff Attorney | Review and summary of quarterly filings, press releases, and FDA 501K decisions. | 01 | 3.75 | \$525 | \$1,968.75 |
| 08/08/2024 | Cindy Bomzer-Stein | Case Manager | Search and distribute news to team | 15 | 0.50 | \$450 | \$225.00 |
| 08/08/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 08/08/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket and motion, docketed document and calendared events. | 13 | 1.75 | \$500 | \$875.00 |
| 08/10/2024 | Nicole Santoro | Associate | Researched possible amendment | 04 | 1.50 | \$500 | \$750.00 |
| 08/11/2024 | Nicole Santoro | Associate | Researched possible amendment | 04 | 2.00 | \$500 | \$1,000.00 |
| 08/12/2024 | Katherine Sinderson | Partner | New allegations research | 04 | 1.00 | \$1,600 | \$1,600.00 |
| 08/13/2024 | Cindy Bomzer-Stein | Case Manager | Search and distribute news to team | 15 | 0.50 | \$450 | \$225.00 |
| 08/13/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve latest analyst reports from Eikon | 01 | 0.50 | \$450 | \$225.00 |
| 08/13/2024 | Katherine Sinderson | Partner | Analyzing potential new class period and potential new statements | 04 | 1.50 | \$1,600 | \$2,400.00 |
| 08/14/2024 | Adam Weinschel | Director of Investor Services | Reviewed lead plaintiff losses in possible expanded class period | 04 | 1.00 | \$650 | \$650.00 |
| 08/14/2024 | Cindy Bomzer-Stein | Case Manager | Search and distribute news to team | 15 | 0.25 | \$450 | \$112.50 |
| 08/14/2024 | Katherine Sinderson | Partner | Review of potential statements and client trading | 04 | 1.00 | \$1,600 | \$1,600.00 |
| 08/16/2024 | Adam Weinschel | Director of Investor Services | Reviewed client losses in possible expanded class period | 04 | 0.25 | \$650 | \$162.50 |
| 08/19/2024 | Cindy Bomzer-Stein | Case Manager | Search and distribute news to team | 15 | 0.25 | \$450 | \$112.50 |
| 08/19/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve docket filings regarding related case | 15 | 0.50 | \$450 | \$225.00 |
| 08/19/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve analyst reports | 01 | 0.50 | \$450 | \$225.00 |
| 08/20/2024 | Cindy Bomzer-Stein | Case Manager | Search and distribute news to team | 15 | 0.25 | \$450 | \$112.50 |
| 08/21/2024 | Cindy Bomzer-Stein | Case Manager | Search and distribute news to team | 15 | 0.25 | \$450 | \$112.50 |
| 08/22/2024 | Katherine Sinderson | Partner | Analysis of potential amendment | 04 | 1.00 | \$1,600 | \$1,600.00 |
| 08/22/2024 | Nicole Santoro | Associate | Edited case schedule for MTD; discussed same with K. Sinderson. | 13 | 0.50 | \$500 | \$250.00 |
| 08/23/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation; review documents related to claims; update cheat sheet | 01 | 0.75 | \$650 | \$487.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-------------------------------------|--|-----------|-------|-------|------------|
| 08/23/2024 | Nicole Santoro | Associate | Edited document for investigators' questions to former employees; discussed case with investigators. | 01 | 0.50 | \$500 | \$250.00 |
| 08/26/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 0.50 | \$650 | \$325.00 |
| 08/26/2024 | Laura Marvelli | Senior Investigator | Identify and research potential witnesses for investigation, locate potential witnesses, review case documents for investigation | 01 | 7.75 | \$500 | \$3,875.00 |
| 08/26/2024 | Nicole Santoro | Associate | Edited stipulation regarding second amended complaint; emailed with opposing counsel regarding same. | 04 | 0.25 | \$500 | \$125.00 |
| 08/27/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation; identifying possible witnesses | 01 | 8.00 | \$500 | \$4,000.00 |
| 08/27/2024 | Nicole Santoro | Associate | Filed stipulation regarding complaint | 04 | 0.50 | \$500 | \$250.00 |
| 08/28/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve latest analyst reports | 01 | 0.25 | \$450 | \$112.50 |
| 08/28/2024 | Laura Marvelli | Senior Investigator | Identify and research potential witnesses for investigation, interview witnesses, locate potential witnesses | 01 | 7.25 | \$500 | \$3,625.00 |
| 08/30/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associate regarding pending stipulation filing; Correspond with director of paralegals and associate regarding status updates on pending stipulation filing | 13 | 1.00 | \$475 | \$475.00 |
| 08/30/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation, conduct interviews; draft notes on interviews | 01 | 7.25 | \$500 | \$3,625.00 |
| 08/30/2024 | Nicole Santoro | Associate | Emailed opposing counsel regarding filing of stipulation on motion to dismiss schedule; discussed filing of same with managing clerks and case team | 13 | 0.50 | \$500 | \$250.00 |
| 09/03/2024 | Cindy Bomzer-Stein | Case Manager | Review stipulation regarding amended complaint | 04 | 0.25 | \$450 | \$112.50 |
| 09/03/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associate regarding pending stipulation filing; Electronic filing of Joint Stipulation and Order Regarding Deadlines for Filing Second Amended Complaint and Briefing on Anticipated Motion to Dismiss | 13 | 1.25 | \$475 | \$593.75 |
| 09/03/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 09/03/2024 | Laura Marvelli | Senior Investigator | Calls, interviews | 01 | 8.00 | \$500 | \$4,000.00 |
| 09/03/2024 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, discussion with assistant managing clerk re filing procedures. | 13 | 1.00 | \$500 | \$500.00 |
| 09/03/2024 | Nicole Santoro | Associate | Discussed status of investigation for amended complaint with investigators | 01 | 0.25 | \$500 | \$125.00 |
| 09/03/2024 | Nicole Santoro | Associate | Discussed case strategy with K. Sinderson | 14 | 0.50 | \$500 | \$250.00 |
| 09/03/2024 | Nicole Santoro | Associate | Filed stipulation concerning scheduling for amended complaint and motion to dismiss briefing. | 13 | 0.25 | \$500 | \$125.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-------------------------------------|---|-----------|-------|-------|------------|
| 09/04/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket, Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 09/04/2024 | Laura Marvelli | Senior Investigator | Working on memo | 01 | 8.00 | \$500 | \$4,000.00 |
| 09/04/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket and order, docketed document and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 09/05/2024 | Laura Marvelli | Senior Investigator | Finishing memo | 01 | 3.50 | \$500 | \$1,750.00 |
| 09/06/2024 | Laura Marvelli | Senior Investigator | Editing, sending memo | 01 | 1.50 | \$500 | \$750.00 |
| 09/08/2024 | Nicole Santoro | Associate | Worked on drafting the amended complaint; identified new false statements for the same. | 04 | 2.00 | \$500 | \$1,000.00 |
| 09/09/2024 | Nicole Santoro | Associate | Worked on amended complaint; discussed new false statements with K. Sinderson | 04 | 0.25 | \$500 | \$125.00 |
| 09/10/2024 | Nicole Santoro | Associate | Worked on drafting amended complaint; drafted new false statements sections; drafted new summary of the fraud section | 04 | 5.75 | \$500 | \$2,875.00 |
| 09/11/2024 | Cindy Bomzer-Stein | Case Manager | Communicate with AlphaSense regarding second amended complaint | 04 | 0.50 | \$450 | \$225.00 |
| 09/11/2024 | Nicole Santoro | Associate | Drafted new FOIA request; submitted the same. | 01 | 0.50 | \$500 | \$250.00 |
| 09/12/2024 | Nicole Santoro | Associate | Discussed drafting of second amended complaint with K. Sinderson. | 04 | 0.50 | \$500 | \$250.00 |
| 09/13/2024 | Nicole Santoro | Associate | Discussed strategy for second amended complaint with K. Sinderson; | 04 | 0.50 | \$500 | \$250.00 |
| 09/13/2024 | Nicole Santoro | Associate | Read memo of investigators' interviews of former employees | 01 | 0.50 | \$500 | \$250.00 |
| 09/19/2024 | Nicole Santoro | Associate | Edited second amended complaint draft; discussed same with K. Sinderson. | 04 | 0.75 | \$500 | \$375.00 |
| 09/20/2024 | Laura Marvelli | Senior Investigator | Locates, review of LinkedIn, interview | 01 | 7.75 | \$500 | \$3,875.00 |
| 09/23/2024 | Jessica Lacon | Docket Clerk | Reviewing tickler/ updating filing tracker, creating filing email for team. | 13 | 0.25 | \$450 | \$112.50 |
| 09/23/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation, conduct interviews | 01 | 7.00 | \$500 | \$3,500.00 |
| 09/23/2024 | Nicole Santoro | Associate | Discussed drafting of SAC with K. Sinderson | 04 | 0.25 | \$500 | \$125.00 |
| 09/23/2024 | Nicole Santoro | Associate | Discussed investigation with investigators | 01 | 0.25 | \$500 | \$125.00 |
| 09/24/2024 | Nicole Santoro | Associate | Worked on second amended complaint | 04 | 0.50 | \$500 | \$250.00 |
| 09/25/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 2.75 | \$650 | \$1,787.50 |
| 09/25/2024 | Nicole Santoro | Associate | Worked on second amended complaint; discussed same with K. Sinderson | 04 | 3.00 | \$500 | \$1,500.00 |
| 09/26/2024 | Amy Bitkower | Managing Director of Investigations | Identify and research potential witnesses for investigation | 01 | 4.25 | \$650 | \$2,762.50 |
| 09/26/2024 | Laura Marvelli | Senior Investigator | Calls to leads, interviews, lead research | 01 | 8.00 | \$500 | \$4,000.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|-------------|
| 09/29/2024 | Nicole Santoro | Associate | Worked on Second Amended Complaint drafting; read related news articles in connection with the same. | 04 | 2.25 | \$500 | \$1,125.00 |
| 09/30/2024 | Laura Marvelli | Senior Investigator | Outreach calls to potential witnesses regarding iRhythm investigation, locate potential witnesses, conduct interviews | 01 | 7.75 | \$500 | \$3,875.00 |
| 09/30/2024 | Nicole Santoro | Associate | Worked on Second Amended Complaint drafting; discussed same with K. Sinderson; read memo of interviews with former iRhythm employees | 04 | 1.00 | \$500 | \$500.00 |
| 10/01/2024 | Katherine Sinderson | Partner | Review of draft complaint | 04 | 1.50 | \$1,600 | \$2,400.00 |
| 10/01/2024 | Laura Marvelli | Senior Investigator | Work on investigation memo, locating potential witnesses | 01 | 7.00 | \$500 | \$3,500.00 |
| 10/01/2024 | Nicole Santoro | Associate | Worked on the Second Amended Complaint; discussed same with K. Sinderson. | 04 | 1.50 | \$500 | \$750.00 |
| 10/01/2024 | Nicole Santoro | Associate | Emailed expert regarding Second Amended Complaint. | 11 | 0.50 | \$500 | \$250.00 |
| 10/02/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 4.50 | \$500 | \$2,250.00 |
| 10/03/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 2.00 | \$1,600 | \$3,200.00 |
| 10/03/2024 | Laura Marvelli | Senior Investigator | Calls, interviews, memo | 01 | 8.00 | \$500 | \$4,000.00 |
| 10/03/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 5.50 | \$500 | \$2,750.00 |
| 10/04/2024 | Adam Weinschel | Director of Investor Services | Reviewed stock chart and drop in amended complaint | 04 | 0.50 | \$650 | \$325.00 |
| 10/04/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed L. Marvelli's investigation memo, updated master, distributed memos | 01 | 1.50 | \$650 | \$975.00 |
| 10/04/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 0.75 | \$1,600 | \$1,200.00 |
| 10/04/2024 | Laura Marvelli | Senior Investigator | Investigation memo | 01 | 2.50 | \$500 | \$1,250.00 |
| 10/04/2024 | Laura Marvelli | Senior Investigator | Interview, notes | 01 | 2.50 | \$500 | \$1,250.00 |
| 10/04/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 5.00 | \$500 | \$2,500.00 |
| 10/05/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 2.00 | \$1,600 | \$3,200.00 |
| 10/05/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 1.50 | \$500 | \$750.00 |
| 10/06/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 2.25 | \$1,600 | \$3,600.00 |
| 10/06/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 2.50 | \$500 | \$1,250.00 |
| 10/07/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed L. Marvelli's memo re investigation | 01 | 1.00 | \$650 | \$650.00 |
| 10/07/2024 | Janielle Lattimore | Assistant Managing Clerk | Review correspondence from associate regarding pending amended complaint filing | 04 | 0.25 | \$475 | \$118.75 |
| 10/07/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 7.75 | \$1,600 | \$12,400.00 |
| 10/07/2024 | Laura Marvelli | Senior Investigator | Writing memo summarizing interviews & circulating same, pulling last potential witnesses. | 01 | 7.50 | \$500 | \$3,750.00 |
| 10/07/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 5.50 | \$500 | \$2,750.00 |
| 10/07/2024 | Thomas Sperber | Associate | Call to get up to speed on amendment to be filed at end of week | 04 | 0.50 | \$875 | \$437.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|------------|
| 10/07/2024 | Toby Saviano | Case Manager | Pull analyst reports. | 01 | 2.00 | \$450 | \$900.00 |
| 10/08/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associate regarding filing plan for amended complaint; Review rules, procedures, and docket, prepare filing plan for amended complaint with motion to seal; Circulate filing plan and schedule meeting | 04 | 2.50 | \$475 | \$1,187.50 |
| 10/08/2024 | Jessica Lacon | Docket Clerk | Reviewing email updating filing tracker | 13 | 0.25 | \$450 | \$112.50 |
| 10/08/2024 | John Rizio-Hamilton | Partner | Amended complaint. | 04 | 3.00 | \$1,800 | \$5,400.00 |
| 10/08/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 2.00 | \$1,600 | \$3,200.00 |
| 10/08/2024 | Laura Marvelli | Senior Investigator | Calls, interviews, memo | 01 | 7.75 | \$500 | \$3,875.00 |
| 10/08/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 5.50 | \$500 | \$2,750.00 |
| 10/08/2024 | Thomas Sperber | Associate | Work re: finalizing complaint to be filed at end of week | 04 | 2.75 | \$875 | \$2,406.25 |
| 10/08/2024 | Toby Saviano | Case Manager | Review amended complaint for documents related to false allegations; collect same, index and prepare a binder of same. | 04 | 7.00 | \$450 | \$3,150.00 |
| 10/09/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed Laura Marvelli's memo concerning investigation & interviews | 01 | 0.50 | \$650 | \$325.00 |
| 10/09/2024 | Cindy Bomzer-Stein | Case Manager | Cite check second amended complaint | 04 | 6.50 | \$450 | \$2,925.00 |
| 10/09/2024 | Cindy Bomzer-Stein | Case Manager | Draft sealing motion regarding second amended complaint | 04 | 0.75 | \$450 | \$337.50 |
| 10/09/2024 | Cindy Bomzer-Stein | Case Manager | Attend filing plan meeting regarding second amended complaint | 04 | 0.50 | \$450 | \$225.00 |
| 10/09/2024 | Janielle Lattimore | Assistant Managing Clerk | Filing plan meeting and updates to filing plan | 04 | 1.00 | \$475 | \$475.00 |
| 10/09/2024 | Jessica Lacon | Docket Clerk | Filing plan meeting. Review email and docket and diary relevant dates and deadlines | 04 | 1.00 | \$450 | \$450.00 |
| 10/09/2024 | John Rizio-Hamilton | Partner | Amended complaint. | 04 | 3.00 | \$1,800 | \$5,400.00 |
| 10/09/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 6.00 | \$1,600 | \$9,600.00 |
| 10/09/2024 | Laura Marvelli | Senior Investigator | Calls to last former employees, interview | 01 | 3.75 | \$500 | \$1,875.00 |
| 10/09/2024 | Mahiri Buffong | Managing Clerk | Reviewed document for compliance, attended filing plan meeting. | 04 | 1.50 | \$500 | \$750.00 |
| 10/09/2024 | Nicole Santoro | Associate | Filing plan meeting for second amended complaint | 04 | 0.25 | \$500 | \$125.00 |
| 10/09/2024 | Nicole Santoro | Associate | Worked on SAC | 04 | 7.50 | \$500 | \$3,750.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|-------------|
| 10/09/2024 | Thomas Sperber | Associate | Analysis of defendants' statements and stock chart to ensure all possible corrective disclosures are included; review of amended complaint to be filed on Friday; meeting to discuss finalization of complaint | 04 | 8.75 | \$875 | \$7,656.25 |
| 10/09/2024 | Toby Saviano | Case Manager | Review binder of false allegations documents. Respond to attorney requests for documents. Update case files. | 04 | 1.50 | \$450 | \$675.00 |
| 10/10/2024 | Amy Bitkower | Managing Director of Investigations | Reviewed Laura's interview memo; review research for potential witnesses | 01 | 1.00 | \$650 | \$650.00 |
| 10/10/2024 | Cindy Bomzer-Stein | Case Manager | Cite check and proofread administrative motion to seal regarding second amended complaint | 04 | 0.50 | \$450 | \$225.00 |
| 10/10/2024 | Cindy Bomzer-Stein | Case Manager | Cite check second amended complaint | 04 | 1.00 | \$450 | \$450.00 |
| 10/10/2024 | Janielle Lattimore | Assistant Managing Clerk | Review rules and correspond with associate regarding sealing requirements for pending filings | 04 | 1.00 | \$475 | \$475.00 |
| 10/10/2024 | John Rizio-Hamilton | Partner | Amended complaint. | 04 | 2.50 | \$1,800 | \$4,500.00 |
| 10/10/2024 | Katherine Sinderson | Partner | Revising complaint, email to client | 04 | 1.50 | \$1,600 | \$2,400.00 |
| 10/10/2024 | Laura Marvelli | Senior Investigator | Attempts to interview former employee | 01 | 0.50 | \$500 | \$250.00 |
| 10/10/2024 | Nicole Santoro | Associate | Edited SAC | 04 | 6.00 | \$500 | \$3,000.00 |
| 10/10/2024 | Thomas Sperber | Associate | Work on finalizing amended complaint and accompanying documents for filing tomorrow | 04 | 9.50 | \$875 | \$8,312.50 |
| 10/11/2024 | Cindy Bomzer-Stein | Case Manager | Finalize papers for filing regarding second amended complaint | 04 | 1.50 | \$450 | \$675.00 |
| 10/11/2024 | Cindy Bomzer-Stein | Case Manager | Communicate with managing clerks office regarding revisions to filing plan regarding second amended complaint | 04 | 0.50 | \$450 | \$225.00 |
| 10/11/2024 | Cindy Bomzer-Stein | Case Manager | Work with admin support to format motion to seal regarding second amended complaint | 04 | 0.75 | \$450 | \$337.50 |
| 10/11/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with paralegal regarding additional exhibits to be included in filing; Revise and circulate updated filing plan to case team; Discuss filing with managing clerk | 04 | 1.50 | \$475 | \$712.50 |
| 10/11/2024 | Jessica Lacon | Docket Clerk | Updating filing tracker. Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 10/11/2024 | Katherine Sinderson | Partner | Revising complaint | 04 | 7.50 | \$1,600 | \$12,000.00 |
| 10/11/2024 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, filed documents. | 04 | 2.00 | \$500 | \$1,000.00 |
| 10/11/2024 | Nicole Santoro | Associate | Filed and finalized SAC | 04 | 6.00 | \$500 | \$3,000.00 |
| 10/11/2024 | Thomas Sperber | Associate | Revise, finalize, and file amended complaint | 04 | 8.25 | \$875 | \$7,218.75 |
| 10/12/2024 | Katherine Sinderson | Partner | Email to client | 16 | 0.50 | \$1,600 | \$800.00 |
| 10/14/2024 | Cindy Bomzer-Stein | Case Manager | Draft waiver of service of summons forms regarding amended complaints | 04 | 0.75 | \$450 | \$337.50 |
| 10/14/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|------------|
| 10/15/2024 | Jessica Lacon | Docket Clerk | Initiate case tracking on Mark Habelt, Petitioner v. iRhythm Technologies, Inc., et al. for T.Sperber, N.Santoro, C. Bomzer-Stein, K. Sinderson | 13 | 0.25 | \$450 | \$112.50 |
| 10/17/2024 | Cindy Bomzer-Stein | Case Manager | Finalize waiver of service of summons | 04 | 0.50 | \$450 | \$225.00 |
| 10/17/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 10/18/2024 | Cindy Bomzer-Stein | Case Manager | Finalize for filing waiver of service of summons | 04 | 0.50 | \$450 | \$225.00 |
| 10/18/2024 | Janielle Lattimore | Assistant Managing Clerk | Electronic filing of waiver of service | 04 | 0.75 | \$475 | \$356.25 |
| 10/18/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 10/18/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket, order, docketed document and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 10/18/2024 | Mahiri Buffong | Managing Clerk | Reviewed document for filing compliance. | 13 | 0.50 | \$500 | \$250.00 |
| 10/18/2024 | Thomas Sperber | Associate | Finalize and file waiver of service of process form | 04 | 0.50 | \$875 | \$437.50 |
| 11/20/2024 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 11/20/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket, email and notice, docketed documents and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 11/25/2024 | Katherine Sinderson | Partner | Motion to dismiss opposition facts | 05 | 2.25 | \$1,600 | \$3,600.00 |
| 11/26/2024 | Katherine Sinderson | Partner | Motion to dismiss opposition facts | 05 | 2.00 | \$1,600 | \$3,200.00 |
| 12/09/2024 | Brittney Balser | Associate | Review Amended Complaint | 05 | 3.50 | \$875 | \$3,062.50 |
| 12/09/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 12/10/2024 | Brittney Balser | Associate | Review Amended Complaint | 05 | 1.00 | \$875 | \$875.00 |
| 12/10/2024 | Cindy Bomzer-Stein | Case Manager | Draft notice of withdrawal of appearance for N. Santoro | 13 | 0.50 | \$450 | \$225.00 |
| 12/10/2024 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case team regarding filing requirements and procedures for notice of change in counsel; Electronic filing of notice of change in counsel for associate | 13 | 0.75 | \$475 | \$356.25 |
| 12/10/2024 | Jessica Lacon | Docket Clerk | Update case profile. Initiate case tracking on 3:24-cv-00706 for B. Balser | 13 | 0.50 | \$450 | \$225.00 |
| 12/10/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket, email and updated calendared events. Reviewed document for filing compliance. | 13 | 1.50 | \$500 | \$750.00 |
| 12/11/2024 | Brittney Balser | Associate | Outline opposition to motion to dismiss | 05 | 1.50 | \$875 | \$1,312.50 |
| 12/11/2024 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.25 | \$875 | \$1,093.75 |
| 12/11/2024 | Brittney Balser | Associate | Team meeting to discuss motion to dismiss strategy | 05 | 1.25 | \$875 | \$1,093.75 |
| 12/11/2024 | Brittney Balser | Associate | Review and analyze Motion to Dismiss | 05 | 1.75 | \$875 | \$1,531.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|--------------------------|---|-----------|-------|-------|------------|
| 12/11/2024 | Cindy Bomzer-Stein | Case Manager | Organize files for binders regarding motion to dismiss and request for judicial intervention for T. Sperber and B. Balser | 05 | 1.25 | \$450 | \$562.50 |
| 12/11/2024 | Cindy Bomzer-Stein | Case Manager | Draft joint stipulation to extend deadline for request for judicial intervention | 05 | 0.75 | \$450 | \$337.50 |
| 12/11/2024 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited in defendants' motion to dismiss and request for judicial notice | 05 | 2.50 | \$450 | \$1,125.00 |
| 12/11/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket, notices and orders, docketed documents and calendared events. | 13 | 1.75 | \$500 | \$875.00 |
| 12/11/2024 | Thomas Sperber | Associate | Review motion to dismiss; draft and circulate initial reactions and thoughts; meeting with K. Sinderson to discuss opposition briefing; liaise with opp. counsel to set a briefing schedule for request for judicial notice | 05 | 4.00 | \$875 | \$3,500.00 |
| 12/12/2024 | Brittney Balser | Associate | Outline opposition to motion to dismiss | 05 | 2.75 | \$875 | \$2,406.25 |
| 12/12/2024 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 2.50 | \$875 | \$2,187.50 |
| 12/12/2024 | Cindy Bomzer-Stein | Case Manager | Organize files for binders regarding motion to dismiss and request for judicial intervention for T. Sperber and B. Balser | 05 | 0.50 | \$450 | \$225.00 |
| 12/12/2024 | Cindy Bomzer-Stein | Case Manager | Draft and finalize pro hac vice application for B. Balser | 13 | 0.75 | \$450 | \$337.50 |
| 12/12/2024 | Jessica Lacon | Docket Clerk | Obtaining Certificate of Good Standing for B. Balser, requesting ECF credentials; review order, reconcile and docket | 13 | 0.50 | \$450 | \$225.00 |
| 12/12/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket and order, docketed document and calendared events. Registered attorney for filing credentials. | 13 | 1.25 | \$500 | \$625.00 |
| 12/12/2024 | Thomas Sperber | Associate | Draft, revise, and finalize for filing scheduling stipulation re: request for judicial notice | 05 | 1.00 | \$875 | \$875.00 |
| 12/13/2024 | Brittney Balser | Associate | Outline opposition to motion to dismiss | 05 | 2.00 | \$875 | \$1,750.00 |
| 12/13/2024 | Janielle Lattimore | Assistant Managing Clerk | Electronic filing of PHV for associate; Electronic filing of stipulation setting briefing schedule | 13 | 2.25 | \$475 | \$1,068.75 |
| 12/13/2024 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 12/13/2024 | Mahiri Buffong | Managing Clerk | Reviewed docket and order, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 12/13/2024 | Thomas Sperber | Associate | Coordinate with paras and filing staff to get scheduling stip and PHV on file | 13 | 0.50 | \$875 | \$437.50 |
| 12/14/2024 | Brittney Balser | Associate | Outline opposition to motion to dismiss | 05 | 4.50 | \$875 | \$3,937.50 |
| 12/15/2024 | Brittney Balser | Associate | Outline opposition to motion to dismiss | 05 | 3.00 | \$875 | \$2,625.00 |
| 12/16/2024 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 2.00 | \$875 | \$1,750.00 |
| 12/16/2024 | Brittney Balser | Associate | Outline opposition to motion to dismiss | 05 | 6.50 | \$875 | \$5,687.50 |
| 12/16/2024 | Thomas Sperber | Associate | Draft detailed outline of falsity section of motion to dismiss opp | 05 | 7.00 | \$875 | \$6,125.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------|---|-----------|-------|---------|-------------|
| 12/18/2024 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 2.25 | \$875 | \$1,968.75 |
| 12/19/2024 | Brittney Balser | Associate | Review and analyze defendants' motions | 05 | 0.50 | \$875 | \$437.50 |
| 12/19/2024 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.75 | \$875 | \$1,531.25 |
| 12/19/2024 | Brittney Balser | Associate | Draft Opposition to Motion to Dismiss outline | 05 | 0.75 | \$875 | \$656.25 |
| 12/20/2024 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 2.75 | \$875 | \$2,406.25 |
| 12/20/2024 | Katherine Sinderson | Partner | Review motion to dismiss outline | 05 | 1.50 | \$1,600 | \$2,400.00 |
| 12/23/2024 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 0.50 | \$875 | \$437.50 |
| 12/23/2024 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss outline | 05 | 1.50 | \$875 | \$1,312.50 |
| 12/23/2024 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 2.00 | \$875 | \$1,750.00 |
| 12/26/2024 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 1.00 | \$875 | \$875.00 |
| 12/26/2024 | Brittney Balser | Associate | Legal research for opposition to motion for judicial notice | 05 | 1.25 | \$875 | \$1,093.75 |
| 12/30/2024 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 4.50 | \$875 | \$3,937.50 |
| 01/01/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 2.00 | \$875 | \$1,750.00 |
| 01/02/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 7.00 | \$875 | \$6,125.00 |
| 01/02/2025 | Thomas Sperber | Associate | Work on motion to dismiss opp.; review derivative case assigned to our judge for assessment of relation to our case | 05 | 1.50 | \$875 | \$1,312.50 |
| 01/03/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 1.75 | \$875 | \$1,531.25 |
| 01/03/2025 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 2.75 | \$875 | \$2,406.25 |
| 01/04/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 2.50 | \$875 | \$2,187.50 |
| 01/05/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 0.50 | \$875 | \$437.50 |
| 01/05/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 3.75 | \$875 | \$3,281.25 |
| 01/06/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 9.00 | \$875 | \$7,875.00 |
| 01/06/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.00 | \$875 | \$875.00 |
| 01/06/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 01/08/2025 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 1.00 | \$875 | \$875.00 |
| 01/08/2025 | Cindy Bomzer-Stein | Case Manager | Research latest news | 15 | 0.75 | \$450 | \$337.50 |
| 01/08/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve docket filings from related case | 15 | 1.00 | \$450 | \$450.00 |
| 01/08/2025 | Cindy Bomzer-Stein | Case Manager | Research case on Westlaw regarding motion to dismiss opposition | 05 | 0.25 | \$450 | \$112.50 |
| 01/08/2025 | Thomas Sperber | Associate | Begin drafting falsity section of motion to dismiss opp. | 05 | 2.75 | \$875 | \$2,406.25 |
| 01/09/2025 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 3.00 | \$875 | \$2,625.00 |
| 01/09/2025 | Thomas Sperber | Associate | Work on falsity section of motion to dismiss opp | 05 | 4.00 | \$875 | \$3,500.00 |
| 01/10/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 6.50 | \$1,600 | \$10,400.00 |
| 01/10/2025 | Thomas Sperber | Associate | Complete draft of falsity section of motion to dismiss opp and circulate to K. Sinderson | 05 | 6.00 | \$875 | \$5,250.00 |
| 01/11/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 5.50 | \$1,600 | \$8,800.00 |
| 01/12/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 6.00 | \$1,600 | \$9,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|-------------|
| 01/13/2025 | Brittney Balser | Associate | Draft Opposition to Motion for judicial notice outline | 05 | 1.75 | \$875 | \$1,531.25 |
| 01/13/2025 | Brittney Balser | Associate | Team meeting to discuss motion to dismiss opposition strategy | 05 | 1.00 | \$875 | \$875.00 |
| 01/13/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 2.25 | \$875 | \$1,968.75 |
| 01/13/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.00 | \$875 | \$875.00 |
| 01/13/2025 | Cindy Bomzer-Stein | Case Manager | Organize binder for K. Sinderson regarding request for judicial notice | 05 | 1.25 | \$450 | \$562.50 |
| 01/13/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 05 | 0.25 | \$450 | \$112.50 |
| 01/13/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp and team meeting | 05 | 10.00 | \$1,600 | \$16,000.00 |
| 01/13/2025 | Thomas Sperber | Associate | Work on draft motion to dismiss opposition, including loss causation section incorporating K. Sinderson's edits and cutting down to size; team call to discuss draft progress and next steps | 05 | 3.75 | \$875 | \$3,281.25 |
| 01/14/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 0.50 | \$875 | \$437.50 |
| 01/14/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 8.75 | \$875 | \$7,656.25 |
| 01/14/2025 | Janielle Lattimore | Assistant Managing Clerk | Update filing tracker with pending deadline | 05 | 0.25 | \$475 | \$118.75 |
| 01/14/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opposition | 05 | 1.00 | \$1,600 | \$1,600.00 |
| 01/14/2025 | Thomas Sperber | Associate | Continue working on draft motion to dismiss opposition | 05 | 3.00 | \$875 | \$2,625.00 |
| 01/15/2025 | Brittney Balser | Associate | Draft opposition to motion to dismiss | 05 | 5.25 | \$875 | \$4,593.75 |
| 01/15/2025 | Cindy Bomzer-Stein | Case Manager | Organize FDA materials on SharePoint regarding motion to dismiss opposition | 05 | 0.25 | \$450 | \$112.50 |
| 01/15/2025 | Thomas Sperber | Associate | Continue working on motion to dismiss opposition | 05 | 3.00 | \$875 | \$2,625.00 |
| 01/16/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 7.75 | \$875 | \$6,781.25 |
| 01/16/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 2.00 | \$1,600 | \$3,200.00 |
| 01/16/2025 | Thomas Sperber | Associate | Incorporate K. Sinderson's comments and revise pursuant to other discussions motion to dismiss opposition brief | 05 | 4.00 | \$875 | \$3,500.00 |
| 01/16/2025 | Thomas Sperber | Associate | Draft email to expert re: help on opposition draft | 11 | 0.50 | \$875 | \$437.50 |
| 01/17/2025 | Brittney Balser | Associate | Draft Opposition to Motion to dismiss | 05 | 4.75 | \$875 | \$4,156.25 |
| 01/17/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 9.00 | \$1,600 | \$14,400.00 |
| 01/18/2025 | Brittney Balser | Associate | Draft opposition to motion to dismiss | 05 | 5.25 | \$875 | \$4,593.75 |
| 01/18/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.50 | \$875 | \$1,312.50 |
| 01/19/2025 | Brittney Balser | Associate | Draft opposition to motion to dismiss | 05 | 1.75 | \$875 | \$1,531.25 |
| 01/19/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.25 | \$875 | \$1,093.75 |
| 01/19/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 1.00 | \$1,600 | \$1,600.00 |
| 01/20/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.50 | \$875 | \$1,312.50 |
| 01/20/2025 | Brittney Balser | Associate | Draft opposition to motion to dismiss | 05 | 4.00 | \$875 | \$3,500.00 |
| 01/21/2025 | Brittney Balser | Associate | Legal research for opposition to motion to dismiss | 05 | 1.25 | \$875 | \$1,093.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|------------|
| 01/21/2025 | Brittney Balser | Associate | Draft opposition to motion to dismiss | 05 | 0.25 | \$875 | \$218.75 |
| 01/21/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 3.75 | \$1,600 | \$6,000.00 |
| 01/21/2025 | Thomas Sperber | Associate | Revise motion to dismiss opp brief | 05 | 3.50 | \$875 | \$3,062.50 |
| 01/22/2025 | Brittney Balser | Associate | Draft opposition to motion to dismiss | 05 | 0.25 | \$875 | \$218.75 |
| 01/22/2025 | Janielle Lattimore | Assistant Managing Clerk | Review rules, procedures, and docket, begin preparing filing plan for motion to dismiss and response to request for judicial notice | 05 | 1.00 | \$475 | \$475.00 |
| 01/22/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 5.00 | \$1,600 | \$8,000.00 |
| 01/22/2025 | Thomas Sperber | Associate | Meet with K. Sinderson to discuss status of motion to dismiss opposition brief; revise and incorporate K. Sinderson's comments/edits to brief, including focusing on cutting length | 05 | 6.50 | \$875 | \$5,687.50 |
| 01/23/2025 | Cindy Bomzer-Stein | Case Manager | Cite check motion to dismiss opposition | 05 | 4.75 | \$450 | \$2,137.50 |
| 01/23/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case manager regarding filing plan; Review draft of opposition to motion to dismiss; finalize and circulate filing plan with request for availability to meet | 05 | 2.00 | \$475 | \$950.00 |
| 01/23/2025 | Jessica Lacon | Docket Clerk | Reviewing emails re filing, scheduling filing plan meeting | 05 | 0.25 | \$450 | \$112.50 |
| 01/23/2025 | Katherine Sinderson | Partner | Editing motion to dismiss opp | 05 | 3.00 | \$1,600 | \$4,800.00 |
| 01/23/2025 | Mahiri Buffong | Managing Clerk | Reviewed filing plan. Discussion with assistant managing clerk re filing plan. | 05 | 1.00 | \$500 | \$500.00 |
| 01/23/2025 | Thomas Sperber | Associate | Incorporate K. Sinderson comments and otherwise revise consistent with meeting on Wednesday; review Defs' request for judicial notice and accompanying documents to make recommendation to K. Sinderson re: which docs to challenge; review existing detailed outline of request for judicial notice opp | 05 | 5.00 | \$875 | \$4,375.00 |
| 01/24/2025 | Cindy Bomzer-Stein | Case Manager | Cite check motion to dismiss opposition | 05 | 7.50 | \$450 | \$3,375.00 |
| 01/24/2025 | Cindy Bomzer-Stein | Case Manager | Attend filing plan meeting regarding motion to dismiss opposition | 05 | 0.25 | \$450 | \$112.50 |
| 01/24/2025 | Janielle Lattimore | Assistant Managing Clerk | Filing plan meeting and updates to filing plan per discussion | 05 | 0.75 | \$475 | \$356.25 |
| 01/24/2025 | Thomas Sperber | Associate | Revise motion to dismiss opposition draft | 05 | 6.25 | \$875 | \$5,468.75 |
| 01/25/2025 | Thomas Sperber | Associate | Incorporate K. Sinderson's edits to motion to dismiss opp and further revise in advance of next week's filing | 05 | 3.00 | \$875 | \$2,625.00 |
| 01/26/2025 | Thomas Sperber | Associate | Continue revising motion to dismiss opp and drafting request for judicial notice opposition | 05 | 1.50 | \$875 | \$1,312.50 |
| 01/27/2025 | Cindy Bomzer-Stein | Case Manager | Cite check revised motion to dismiss opposition | 05 | 3.50 | \$450 | \$1,575.00 |
| 01/27/2025 | Cindy Bomzer-Stein | Case Manager | Review motion to dismiss memorandum regarding exhibit citations for T. Sperber | 05 | 0.50 | \$450 | \$225.00 |
| 01/27/2025 | Cindy Bomzer-Stein | Case Manager | Draft request to seal motion regarding motion to dismiss opposition | 05 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|-------------|
| 01/27/2025 | Cindy Bomzer-Stein | Case Manager | Draft declaration regarding motion to dismiss opposition | 05 | 0.50 | \$450 | \$225.00 |
| 01/27/2025 | Thomas Sperber | Associate | Work on finalizing and making revisions to drafts of motion to dismiss opposition and draft request for judicial notice opposition | 05 | 9.75 | \$875 | \$8,531.25 |
| 01/28/2025 | Cindy Bomzer-Stein | Case Manager | Cite check revised motion to dismiss opposition brief | 05 | 3.25 | \$450 | \$1,462.50 |
| 01/28/2025 | Cindy Bomzer-Stein | Case Manager | Cite check request for judicial notice opposition brief regarding motion to dismiss | 05 | 2.00 | \$450 | \$900.00 |
| 01/28/2025 | Cindy Bomzer-Stein | Case Manager | Analyze defendants' insider trading data regarding opposition to motion to dismiss | 05 | 3.75 | \$450 | \$1,687.50 |
| 01/28/2025 | Katherine Sinderson | Partner | Editing opposition to motion to dismiss and request for judicial notice | 05 | 6.00 | \$1,600 | \$9,600.00 |
| 01/28/2025 | Thomas Sperber | Associate | Revise and work towards finalizing oppositions to motion to dismiss and request for judicial notice, along with ancillary documents | 05 | 10.25 | \$875 | \$8,968.75 |
| 01/29/2025 | Cindy Bomzer-Stein | Case Manager | Cite check and update filing papers regarding opposition to motion to dismiss | 05 | 7.75 | \$450 | \$3,487.50 |
| 01/29/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with paralegal regarding pending filing; Review and update filing plan; Correspond with associate and paralegal and monitor emails regarding status updates; Electronic filing of oppositions to motion to dismiss and request for judicial notice and motion to seal | 05 | 4.00 | \$475 | \$1,900.00 |
| 01/29/2025 | Katherine Sinderson | Partner | Editing opposition to motion to dismiss and request for judicial notice | 05 | 11.25 | \$1,600 | \$18,000.00 |
| 01/29/2025 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance. | 05 | 1.25 | \$500 | \$625.00 |
| 01/29/2025 | Thomas Sperber | Associate | Incorporate K. Sinderson's edits and comments to, revise, finalize, and file oppositions to motion to dismiss and request for judicial notice | 05 | 10.00 | \$875 | \$8,750.00 |
| 01/30/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited regarding opposition to motion to dismiss | 05 | 2.25 | \$450 | \$1,012.50 |
| 01/30/2025 | Katherine Sinderson | Partner | Follow up on motion to dismiss filing | 13 | 2.50 | \$1,600 | \$4,000.00 |
| 01/31/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 02/03/2025 | Cindy Bomzer-Stein | Case Manager | Organize binders regarding cases cited in motion to dismiss and request for judicial notice | 05 | 5.00 | \$450 | \$2,250.00 |
| 02/03/2025 | Thomas Sperber | Associate | Coordinate with para re former iRhthym employees' information and confirm allegations attributed to former employees in complaint | 01 | 0.25 | \$875 | \$218.75 |
| 02/04/2025 | Cindy Bomzer-Stein | Case Manager | Create allegations chart from former employees regarding motion to dismiss | 01 | 3.75 | \$450 | \$1,687.50 |
| 02/04/2025 | Laura Marvelli | Senior Investigator | Reaching out to former employees, setting up calls | 01 | 0.75 | \$500 | \$375.00 |
| 02/04/2025 | Thomas Sperber | Associate | Debrief meeting with K. Sinderson re: motion to dismiss opp drafting process | 13 | 0.50 | \$875 | \$437.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|--------------------------|--|-----------|-------|-------|------------|
| 02/05/2025 | Laura Marvelli | Senior Investigator | Attempt at former employee call, rescheduling, case discussion | 01 | 0.50 | \$500 | \$250.00 |
| 02/05/2025 | Thomas Sperber | Associate | Work with paralegal to compile and review former employee allegations; meet with K. Sinderson to discuss former employee reachout | 01 | 1.25 | \$875 | \$1,093.75 |
| 02/06/2025 | Laura Marvelli | Senior Investigator | F/u call with K. Sinderson to former employee | 01 | 0.50 | \$500 | \$250.00 |
| 02/19/2025 | Janielle Lattimore | Assistant Managing Clerk | Discuss pending errata filing with paralegal | 04 | 0.50 | \$475 | \$237.50 |
| 02/21/2025 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 02/24/2025 | Cindy Bomzer-Stein | Case Manager | Research errata exemplars regarding amended complaint | 04 | 1.50 | \$450 | \$675.00 |
| 02/24/2025 | Thomas Sperber | Associate | Research cases re notice of errata | 04 | 1.25 | \$875 | \$1,093.75 |
| 02/25/2025 | Cindy Bomzer-Stein | Case Manager | Draft errata regarding amended complaint | 04 | 1.25 | \$450 | \$562.50 |
| 02/25/2025 | Thomas Sperber | Associate | Draft and circulate recommendation on errata to correct error in amended complaint; review and revise draft errata to be filed later in week | 04 | 1.00 | \$875 | \$875.00 |
| 02/26/2025 | Cindy Bomzer-Stein | Case Manager | Communicate with Managing Clerk's office regarding errata | 04 | 0.25 | \$450 | \$112.50 |
| 02/26/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with paralegal regarding draft of errata | 04 | 0.50 | \$475 | \$237.50 |
| 02/26/2025 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 02/27/2025 | Cindy Bomzer-Stein | Case Manager | Finalize errata regarding second amended complaint | 04 | 0.25 | \$450 | \$112.50 |
| 02/27/2025 | Laura Marvelli | Senior Investigator | Discussion with attorneys, call with former employee, communications | 01 | 1.25 | \$500 | \$625.00 |
| 02/27/2025 | Thomas Sperber | Associate | Call with former employee cited in complaint | 01 | 0.50 | \$875 | \$437.50 |
| 02/27/2025 | Thomas Sperber | Associate | Review and finalize complaint errata | 04 | 0.25 | \$875 | \$218.75 |
| 02/28/2025 | Cindy Bomzer-Stein | Case Manager | Finalize errata regarding amended complaint | 04 | 0.25 | \$450 | \$112.50 |
| 02/28/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with paralegal and associate regarding pending filing; electronic filing of errata to second amended complaint | 04 | 1.25 | \$475 | \$593.75 |
| 03/03/2025 | Thomas Sperber | Associate | Draft, discuss with K. Sinderson, and send email to opposing counsel re: errata | 04 | 0.25 | \$875 | \$218.75 |
| 03/10/2025 | Thomas Sperber | Associate | Closely review motion to dismiss reply brief and circulate thoughts to K. Sinderson | 05 | 2.00 | \$875 | \$1,750.00 |
| 03/11/2025 | Cindy Bomzer-Stein | Case Manager | Organize binders regarding motion to dismiss and request for judicial intervention | 05 | 7.75 | \$450 | \$3,487.50 |
| 03/11/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited in motion to dismiss and request for judicial notice replies | 05 | 0.25 | \$450 | \$112.50 |
| 03/11/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases from Westlaw regarding defendants' motion to dismiss reply | 05 | 1.50 | \$450 | \$675.00 |
| 03/11/2025 | Thomas Sperber | Associate | Meet with K. Sinderson to discuss motion to dismiss reply brief | 05 | 0.50 | \$875 | \$437.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------|---|-----------|-------|---------|------------|
| 03/11/2025 | Thomas Sperber | Associate | Draft email to client updating on motion to dismiss reply | 16 | 0.25 | \$875 | \$218.75 |
| 03/13/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 03/13/2025 | Thomas Sperber | Associate | Analyze motion to dismiss briefing to isolate best arguments/cases and circulate to K. Sinderson in advance of meeting; meeting to discuss oral argument preparation | 05 | 2.25 | \$875 | \$1,968.75 |
| 03/17/2025 | Thomas Sperber | Associate | Work on material for hearing prep meeting on Tuesday | 05 | 0.75 | \$875 | \$656.25 |
| 03/18/2025 | Thomas Sperber | Associate | Put together analysis of half-truth legal arguments in memo to K. Sinderson; meeting with K. Sinderson to discuss analysis and to prep for upcoming motion to dismiss hearing | 05 | 2.00 | \$875 | \$1,750.00 |
| 03/20/2025 | Thomas Sperber | Associate | Complete and send written work product re: hearing preparation; meeting with K. Sinderson to discuss hearing prep | 05 | 1.50 | \$875 | \$1,312.50 |
| 03/25/2025 | Thomas Sperber | Associate | Complete analysis of accuracy statement scienter arguments in motion to dismiss briefing and circulate to K. Sinderson | 05 | 2.00 | \$875 | \$1,750.00 |
| 03/26/2025 | Katherine Sinderson | Partner | Prep for oral argument | 05 | 1.00 | \$1,600 | \$1,600.00 |
| 03/26/2025 | Thomas Sperber | Associate | Meeting with K. Sinderson to discuss oral argument prep | 05 | 0.50 | \$875 | \$437.50 |
| 03/31/2025 | Cindy Bomzer-Stein | Case Manager | Search and retrieve docket entries of related case | 15 | 1.50 | \$450 | \$675.00 |
| 03/31/2025 | Jessica Lacon | Docket Clerk | Initiating case track for team Bhargal v. Hawaiian Electric Industries, Inc., No. 3:23-cv-04332 (N.D. Cal.) | 15 | 0.50 | \$450 | \$225.00 |
| 03/31/2025 | Thomas Sperber | Associate | Work on scienter analysis for K. Sinderson oral argument prep | 05 | 2.00 | \$875 | \$1,750.00 |
| 03/31/2025 | Thomas Sperber | Associate | Review Bhargal briefing and liaise with staff attorney re: tracking and analyzing that case | 15 | 0.75 | \$875 | \$656.25 |
| 03/31/2025 | Thomas Sperber | Associate | Work on analysis for K. Sinderson oral argument prep re: scienter for statements from first amended complaint | 05 | 1.25 | \$875 | \$1,093.75 |
| 04/01/2025 | Thomas Sperber | Associate | Complete and circulate to K. Sinderson scienter analysis in preparation for oral argument; meeting to discuss oral argument | 05 | 3.50 | \$875 | \$3,062.50 |
| 04/03/2025 | Thomas Sperber | Associate | Listen in on oral argument before Judge Corley; bi-weekly meeting re: oral argument prep with K. Sinderson | 05 | 1.25 | \$875 | \$1,093.75 |
| 04/04/2025 | Thomas Sperber | Associate | Work on oral argument prep materials | 05 | 1.00 | \$875 | \$875.00 |
| 04/07/2025 | Katherine Sinderson | Partner | Oral argument prep | 05 | 2.00 | \$1,600 | \$3,200.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|----------------|---|-----------|-------|---------|-------------|
| 04/07/2025 | Thomas Sperber | Associate | Conduct detailed analysis of loss causation arguments and caselaw for oral argument; review FDA documents and correspondence for oral argument; | 05 | 3.75 | \$875 | \$3,281.25 |
| 04/10/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve filings from related case docket | 15 | 0.75 | \$450 | \$337.50 |
| 04/10/2025 | Katherine Sinderson | Partner | Hearing prep | 05 | 2.00 | \$1,600 | \$3,200.00 |
| 04/10/2025 | Thomas Sperber | Associate | Oral argument prep for K. Sinderson | 05 | 1.00 | \$875 | \$875.00 |
| 04/12/2025 | Katherine Sinderson | Partner | Preparing for oral argument | 05 | 5.00 | \$1,600 | \$8,000.00 |
| 04/13/2025 | Katherine Sinderson | Partner | Preparing for oral argument | 05 | 2.25 | \$1,600 | \$3,600.00 |
| 04/14/2025 | Katherine Sinderson | Partner | Preparing for oral argument | 05 | 3.75 | \$1,600 | \$6,000.00 |
| 04/14/2025 | Thomas Sperber | Associate | Oral argument prep for K. Sinderson | 05 | 1.75 | \$875 | \$1,531.25 |
| 04/15/2025 | Cindy Bomzer-Stein | Case Manager | Review cases cited in Defendants' motion to dismiss briefing | 05 | 0.75 | \$450 | \$337.50 |
| 04/15/2025 | Katherine Sinderson | Partner | Preparing for oral argument | 05 | 5.00 | \$1,600 | \$8,000.00 |
| 04/15/2025 | Thomas Sperber | Associate | Oral argument prep for K. Sinderson | 05 | 2.00 | \$875 | \$1,750.00 |
| 04/16/2025 | Cindy Bomzer-Stein | Case Manager | Print exhibits regarding motion to dismiss | 05 | 0.25 | \$450 | \$112.50 |
| 04/16/2025 | Katherine Sinderson | Partner | Preparing for oral argument | 05 | 4.00 | \$1,600 | \$6,400.00 |
| 04/16/2025 | Thomas Sperber | Associate | Oral argument prep assignments for K. Sinderson | 05 | 2.50 | \$875 | \$2,187.50 |
| 04/17/2025 | Katherine Sinderson | Partner | Preparing for oral argument | 05 | 4.50 | \$1,600 | \$7,200.00 |
| 04/17/2025 | Thomas Sperber | Associate | Address factual and legal research questions to prep K. Sinderson for oral argument | 05 | 5.00 | \$875 | \$4,375.00 |
| 04/18/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed document and updated calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 04/18/2025 | Thomas Sperber | Associate | Legal research and address factual research questions and tasks from K. Sinderson in preparation for oral argument | 05 | 5.00 | \$875 | \$4,375.00 |
| 04/20/2025 | Katherine Sinderson | Partner | Prepare for court hearing | 05 | 6.50 | \$1,600 | \$10,400.00 |
| 04/21/2025 | Cindy Bomzer-Stein | Case Manager | Organize and send motion to dismiss filings to T. Sperber regarding hearing | 05 | 2.00 | \$450 | \$900.00 |
| 04/21/2025 | Katherine Sinderson | Partner | Prepare for court hearing | 05 | 13.50 | \$1,600 | \$21,600.00 |
| 04/22/2025 | Cindy Bomzer-Stein | Case Manager | Create chart of false statements for motion to dismiss hearing | 05 | 2.00 | \$450 | \$900.00 |
| 04/22/2025 | Katherine Sinderson | Partner | Prepare for court hearing. | 05 | 6.00 | \$1,600 | \$9,600.00 |
| 04/22/2025 | Thomas Sperber | Associate | Prep K. Sinderson for oral argument | 05 | 4.00 | \$875 | \$3,500.00 |
| 04/23/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve and send filings to S. Rosales-Spielman | 05 | 0.50 | \$450 | \$225.00 |
| 04/23/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve motion to dismiss filings and send to T. Sperber regarding motion to dismiss hearing | 05 | 1.00 | \$450 | \$450.00 |
| 04/23/2025 | John Rizio-Hamilton | Partner | Analysis of motion to dismiss papers. Team discussion. | 05 | 4.50 | \$1,800 | \$8,100.00 |
| 04/23/2025 | Katherine Sinderson | Partner | Prepare for court hearing | 05 | 12.00 | \$1,600 | \$19,200.00 |
| 04/23/2025 | Katherine Sinderson | Partner | Meeting with client in preparation for hearing | 16 | 2.50 | \$1,600 | \$4,000.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|-------------|
| 04/23/2025 | Thomas Sperber | Associate | Prep K. Sinderson for oral argument | 05 | 6.25 | \$875 | \$5,468.75 |
| 04/24/2025 | Cindy Bomzer-Stein | Case Manager | Draft transcript order form regarding motion to dismiss hearing | 05 | 0.50 | \$450 | \$225.00 |
| 04/24/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 04/24/2025 | John Rizio-Hamilton | Partner | Motion to dismiss hearing; prep and follow-up analysis. | 05 | 4.00 | \$1,800 | \$7,200.00 |
| 04/24/2025 | Katherine Sinderson | Partner | Prepare for court hearing/court hearing | 05 | 7.50 | \$1,600 | \$12,000.00 |
| 04/24/2025 | Thomas Sperber | Associate | Prep K. Sinderson for oral argument; second chair oral argument | 05 | 5.00 | \$875 | \$4,375.00 |
| 04/30/2025 | Cindy Bomzer-Stein | Case Manager | Revise and finalize transcript order form regarding motion to dismiss hearing | 05 | 0.25 | \$450 | \$112.50 |
| 04/30/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with paralegal regarding pending transcript order filing; Electronic filing of transcript order | 05 | 1.00 | \$475 | \$475.00 |
| 05/06/2025 | Cindy Bomzer-Stein | Case Manager | Upload to iManage and Sharepoint motion to dismiss hearing transcript | 13 | 0.25 | \$450 | \$112.50 |
| 05/07/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 05/12/2025 | Cindy Bomzer-Stein | Case Manager | Research and communicate with court reporter regarding hearing transcript for related case | 13 | 0.75 | \$450 | \$337.50 |
| 05/19/2025 | Cindy Bomzer-Stein | Case Manager | Finalize transcript order form and send to court reporter regarding related case | 13 | 0.50 | \$450 | \$225.00 |
| 05/19/2025 | Mahiri Buffong | Managing Clerk | Corresponded with team re transcript filing procedures. | 13 | 0.50 | \$500 | \$250.00 |
| 05/21/2025 | Cindy Bomzer-Stein | Case Manager | Request and send payment to court reporter for hearing transcript in related case | 13 | 0.25 | \$450 | \$112.50 |
| 05/22/2025 | Katherine Sinderson | Partner | Review possible suppl authority | 14 | 0.75 | \$1,600 | \$1,200.00 |
| 05/22/2025 | Thomas Sperber | Associate | Call with Zio AT customer who reached out | 14 | 0.50 | \$875 | \$437.50 |
| 06/03/2025 | John Rizio-Hamilton | Partner | Analyze motion to dismiss decision | 14 | 2.00 | \$1,800 | \$3,600.00 |
| 06/03/2025 | John Rizio-Hamilton | Partner | Discovery strategy. | 08 | 2.00 | \$1,800 | \$3,600.00 |
| 06/03/2025 | Katherine Sinderson | Partner | Review of decision and analysis; emails re same | 14 | 2.00 | \$1,600 | \$3,200.00 |
| 06/03/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket, orders and notices, docketed documents and calendared events. | 13 | 1.00 | \$500 | \$500.00 |
| 06/03/2025 | Thomas Sperber | Associate | Review motion to dismiss order | 14 | 1.00 | \$875 | \$875.00 |
| 06/03/2025 | Thomas Sperber | Associate | Draft RFPs | 09 | 1.25 | \$875 | \$1,093.75 |
| 06/04/2025 | Cindy Bomzer-Stein | Case Manager | Send schedule requests to managing clerks regarding motion to dismiss order | 13 | 0.25 | \$450 | \$112.50 |
| 06/04/2025 | John Rizio-Hamilton | Partner | Case strategy meeting. | 14 | 1.00 | \$1,800 | \$1,800.00 |
| 06/04/2025 | Katherine Sinderson | Partner | Discovery planning; case management; damages update; meeting with team | 08 | 2.00 | \$1,600 | \$3,200.00 |
| 06/04/2025 | Thomas Sperber | Associate | Call with J. Rizio-Hamilton and K. Sinderson to discuss discovery strategy | 08 | 0.50 | \$875 | \$437.50 |
| 06/06/2025 | Abygail Kitta | Associate | Review relevant case materials. | 14 | 1.25 | \$650 | \$812.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------|--|-----------|-------|---------|------------|
| 06/06/2025 | Cindy Bomzer-Stein | Case Manager | Create shell regarding interrogatories | 09 | 1.25 | \$450 | \$562.50 |
| 06/06/2025 | Cindy Bomzer-Stein | Case Manager | Create shell regarding requests for production | 09 | 1.25 | \$450 | \$562.50 |
| 06/06/2025 | Cindy Bomzer-Stein | Case Manager | Revise shell regarding joint case management statement | 13 | 0.75 | \$450 | \$337.50 |
| 06/06/2025 | Cindy Bomzer-Stein | Case Manager | Research exemplars of joint case management statement to create shell | 13 | 1.75 | \$450 | \$787.50 |
| 06/06/2025 | Thomas Sperber | Associate | Meet with junior associate to walk through drafting 26(f)/CMS report; coordinate with team on drafting initial discovery documents | 08 | 1.50 | \$875 | \$1,312.50 |
| 06/06/2025 | Thomas Sperber | Associate | Coordinate and meet with damages expert re: shortened class period | 11 | 0.75 | \$875 | \$656.25 |
| 06/06/2025 | Thomas Sperber | Associate | Coordinate with defense counsel and the court re: continuing CMC | 13 | 0.75 | \$875 | \$656.25 |
| 06/07/2025 | Thomas Sperber | Associate | Coordinate with defense counsel and the court on timing of CMC | 13 | 0.25 | \$875 | \$218.75 |
| 06/09/2025 | Abygail Krita | Associate | Draft case management statement. | 13 | 6.25 | \$650 | \$4,062.50 |
| 06/09/2025 | Cindy Bomzer-Stein | Case Manager | Create deposition calendar | 10 | 1.00 | \$450 | \$450.00 |
| 06/09/2025 | Cindy Bomzer-Stein | Case Manager | Draft shell regarding subpoena to produce documents | 09 | 1.00 | \$450 | \$450.00 |
| 06/09/2025 | Cindy Bomzer-Stein | Case Manager | Draft shell regarding notice of issuance of subpoena | 09 | 1.00 | \$450 | \$450.00 |
| 06/09/2025 | Cindy Bomzer-Stein | Case Manager | Draft shell regarding notice of deposition | 10 | 1.00 | \$450 | \$450.00 |
| 06/09/2025 | Cindy Bomzer-Stein | Case Manager | Review BioMarin docket regarding template for joint case management statement | 13 | 0.50 | \$450 | \$225.00 |
| 06/09/2025 | Katherine Sinderson | Partner | Case management and discovery | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 06/09/2025 | Katherine Sinderson | Partner | Conference call with expert witness regarding damages methodology | 11 | 0.75 | \$1,600 | \$1,200.00 |
| 06/09/2025 | Thomas Sperber | Associate | Review and revise draft CMS statement | 13 | 1.25 | \$875 | \$1,093.75 |
| 06/09/2025 | Thomas Sperber | Associate | Conference call with expert regarding damages analysis | 11 | 0.75 | \$875 | \$656.25 |
| 06/10/2025 | Abygail Krita | Associate | Draft case management statement. | 13 | 0.50 | \$650 | \$325.00 |
| 06/10/2025 | Thomas Sperber | Associate | Revise and circulate draft RFPs to team for review | 09 | 1.50 | \$875 | \$1,312.50 |
| 06/11/2025 | Abygail Krita | Associate | Draft interrogatories | 09 | 2.25 | \$650 | \$1,462.50 |
| 06/11/2025 | Abygail Krita | Associate | Prepare for case management conference. | 13 | 2.00 | \$650 | \$1,300.00 |
| 06/11/2025 | Cindy Bomzer-Stein | Case Manager | Draft protective order | 08 | 0.50 | \$450 | \$225.00 |
| 06/11/2025 | Cindy Bomzer-Stein | Case Manager | Draft ESI protocol | 08 | 0.75 | \$450 | \$337.50 |
| 06/11/2025 | Cindy Bomzer-Stein | Case Manager | Research and draft initial disclosures | 08 | 1.25 | \$450 | \$562.50 |
| 06/11/2025 | Jessica Lacon | Docket Clerk | Initiating case track for Abby Krita | 13 | 0.25 | \$450 | \$112.50 |
| 06/11/2025 | Katherine Sinderson | Partner | Work on Rule 26(f) report | 08 | 1.25 | \$1,600 | \$2,000.00 |
| 06/11/2025 | Katherine Sinderson | Partner | Work on RFPs | 09 | 1.25 | \$1,600 | \$2,000.00 |
| 06/11/2025 | Thomas Sperber | Associate | Finalize and send draft CMS to Defendants | 13 | 1.00 | \$875 | \$875.00 |
| 06/11/2025 | Thomas Sperber | Associate | Work with junior associate on drafting interrogatories | 09 | 1.25 | \$875 | \$1,093.75 |
| 06/11/2025 | Thomas Sperber | Associate | Create and circulate case workplan and calendar | 14 | 1.25 | \$875 | \$1,093.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|------------|
| 06/12/2025 | Abygail Kritta | Associate | Attend and prepare for Rule 26(f) conference | 08 | 1.00 | \$650 | \$650.00 |
| 06/12/2025 | Abygail Kritta | Associate | Draft interrogatories and RFPs. | 09 | 2.25 | \$650 | \$1,462.50 |
| 06/12/2025 | Cindy Bomzer-Stein | Case Manager | Research exemplars of case management orders from Judge Corley | 13 | 2.25 | \$450 | \$1,012.50 |
| 06/12/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve latest docket entries of related case | 15 | 1.00 | \$450 | \$450.00 |
| 06/12/2025 | John Rizio-Hamilton | Partner | Damages analysis. | 14 | 2.00 | \$1,800 | \$3,600.00 |
| 06/12/2025 | Katherine Sinderson | Partner | Rule 26(f) conference | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 06/12/2025 | Katherine Sinderson | Partner | Work on discovery requests | 09 | 2.75 | \$1,600 | \$4,400.00 |
| 06/12/2025 | Thomas Sperber | Associate | Prepare for and lead Rule 26(f) conference | 08 | 1.00 | \$875 | \$875.00 |
| 06/12/2025 | Thomas Sperber | Associate | Revise and discuss with team edits and comments to draft interrogatories and RFPs; draft and send email to opposing counsel re: request for parameters of DOJ production | 09 | 3.50 | \$875 | \$3,062.50 |
| 06/13/2025 | Abygail Kritta | Associate | Draft and file interrogatories and RFPs. | 09 | 1.25 | \$650 | \$812.50 |
| 06/13/2025 | John Rizio-Hamilton | Partner | Strategy; case schedule. | 14 | 3.00 | \$1,800 | \$5,400.00 |
| 06/13/2025 | Thomas Sperber | Associate | Finalize and serve RFPs and interrogatories | 09 | 1.50 | \$875 | \$1,312.50 |
| 06/13/2025 | Thomas Sperber | Associate | Review and revise draft stip re: deadline to answer amended complaint | 13 | 0.50 | \$875 | \$437.50 |
| 06/16/2025 | Cindy Bomzer-Stein | Case Manager | Search exemplars of Case Management Statements in Northern District of California | 13 | 2.50 | \$450 | \$1,125.00 |
| 06/16/2025 | Cindy Bomzer-Stein | Case Manager | Draft pro hac vice motion for A. Kritta | 13 | 0.50 | \$450 | \$225.00 |
| 06/16/2025 | Juan Lossada | Senior Staff Attorney | Start review of plaintiff's Second Amended Complaint. | 09 | 2.50 | \$525 | \$1,312.50 |
| 06/16/2025 | Thomas Sperber | Associate | Call with former employee cited in complaint | 01 | 0.75 | \$875 | \$656.25 |
| 06/17/2025 | Amy Bitkower | Managing Director of Investigations | Conference with attorneys regarding investigation strategy and witness outreach | 01 | 1.00 | \$650 | \$650.00 |
| 06/17/2025 | Cindy Bomzer-Stein | Case Manager | Research Ninth Circuit related case | 15 | 0.25 | \$450 | \$112.50 |
| 06/17/2025 | Cindy Bomzer-Stein | Case Manager | Search exemplars of Case Management Statements in Northern District of California | 13 | 1.00 | \$450 | \$450.00 |
| 06/17/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 06/17/2025 | Jessica Lacon | Docket Clerk | Initiate case tracking for team; United States of America v. iRhythm Technologies, Inc. , Docket No. 25-3736 (9th Cir. Jun 13, 2025), for K. Sinderson, T. Sperber, A. Kritta, C. Bomzer-Stein | 13 | 0.75 | \$450 | \$337.50 |
| 06/17/2025 | Juan Lossada | Senior Staff Attorney | Review defendants' motion to dismiss and plaintiff's interrogatories to defendants. | 09 | 1.50 | \$525 | \$787.50 |
| 06/17/2025 | Thomas Sperber | Associate | Call with former employee | 01 | 0.50 | \$875 | \$437.50 |
| 06/17/2025 | Thomas Sperber | Associate | Review case management orders and CMS from other cases with tight schedules | 13 | 0.25 | \$875 | \$218.75 |
| 06/18/2025 | Abygail Kritta | Associate | Draft initial disclosures. | 08 | 1.25 | \$650 | \$812.50 |
| 06/18/2025 | Juan Lossada | Senior Staff Attorney | Review exhibits in support of defendants' MTD; start review of opp to MTD. | 09 | 3.00 | \$525 | \$1,575.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 06/18/2025 | Thomas Sperber | Associate | Draft initial disclosures; draft discovery update to team in lieu of team meeting; draft and send email to defendants re: CMS edits and DOJ parameters; discuss potential third party subpoena targets with team | 08 | 2.50 | \$875 | \$2,187.50 |
| 06/20/2025 | Abygail Kritta | Associate | Draft joint case management statement. | 13 | 3.00 | \$650 | \$1,950.00 |
| 06/20/2025 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 06/20/2025 | Juan Lossada | Senior Staff Attorney | Complete review of Plaintiff's Opposition to Defendants' MTD. | 09 | 1.00 | \$525 | \$525.00 |
| 06/20/2025 | Thomas Sperber | Associate | Review defendants' edits to CMS and circulate detailed thoughts and observations to team to discuss; draft further edits to CMS and schedule and cover email responding to Defendants; work with junior associate to finalize CMS for partner review | 13 | 2.75 | \$875 | \$2,406.25 |
| 06/23/2025 | Juan Lossada | Senior Staff Attorney | Start review of Defendants' Reply to Opp to MTD. | 09 | 0.50 | \$525 | \$262.50 |
| 06/23/2025 | Thomas Sperber | Associate | Draft and send email response to defendants re: edits to CMS including counter-proposal for discovery schedule | 08 | 1.50 | \$875 | \$1,312.50 |
| 06/24/2025 | Abygail Kritta | Associate | Draft initial disclosures. | 08 | 2.50 | \$650 | \$1,625.00 |
| 06/24/2025 | Cindy Bomzer-Stein | Case Manager | Review related case docket for filings | 15 | 0.25 | \$450 | \$112.50 |
| 06/24/2025 | Juan Lossada | Senior Staff Attorney | Complete review of defendants' Reply to Opp to MTD. | 09 | 0.50 | \$525 | \$262.50 |
| 06/25/2025 | Abygail Kritta | Associate | Draft initial disclosures and case management statement. | 08 | 1.75 | \$650 | \$1,137.50 |
| 06/25/2025 | Thomas Sperber | Associate | Update initial disclosure draft | 08 | 0.25 | \$875 | \$218.75 |
| 06/26/2025 | Abygail Kritta | Associate | Discuss case status with opposing counsel (0.5 hrs); discuss case status with BLBG team (0.25 hrs); draft case management statement (0.5 hrs) | 13 | 1.25 | \$650 | \$812.50 |
| 06/26/2025 | Thomas Sperber | Associate | Prepare for and lead M&C on CMS, discovery issues, and discovery schedule; update J. Rizio-Hamilton on M&C | 08 | 0.50 | \$875 | \$437.50 |
| 06/26/2025 | Thomas Sperber | Associate | Weekly team meeting | 09 | 0.50 | \$875 | \$437.50 |
| 06/26/2025 | Thomas Sperber | Associate | Discuss FDA experts with colleagues; reach out to J. Uslaner re: FDA contact | 11 | 0.50 | \$875 | \$437.50 |
| 06/27/2025 | Thomas Sperber | Associate | Finalize and serve initial disclosures | 08 | 0.75 | \$875 | \$656.25 |
| 06/30/2025 | Katherine Sinderson | Partner | Case management statement | 13 | 0.50 | \$1,600 | \$800.00 |
| 06/30/2025 | Thomas Sperber | Associate | Review, analyze, and discuss Defendants' discovery schedule counter proposal | 08 | 3.00 | \$875 | \$2,625.00 |
| 06/30/2025 | Thomas Sperber | Associate | Review Defendants' edits to CMS, draft substantive position points for CMS; work with junior associate on legal research for CMS | 13 | 1.00 | \$875 | \$875.00 |
| 07/01/2025 | Abygail Kritta | Associate | Draft joint case management statement and proposed order | 13 | 5.25 | \$650 | \$3,412.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------|--|-----------|-------|---------|------------|
| 07/01/2025 | Cindy Bomzer-Stein | Case Manager | Finalize pro hac vice motion for filing for A. Kritta | 13 | 0.25 | \$450 | \$112.50 |
| 07/01/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 07/01/2025 | John Rizio-Hamilton | Partner | Case management statement/dispute. | 13 | 1.50 | \$1,800 | \$2,700.00 |
| 07/01/2025 | Katherine Sinderson | Partner | Case management statement | 13 | 0.75 | \$1,600 | \$1,200.00 |
| 07/01/2025 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, filed and docketed documents. | 13 | 0.75 | \$500 | \$375.00 |
| 07/01/2025 | Roberto Santamarina | Litigation Support | Download, organize, and process of Def production (IRHYTHM001) into reviewable format. Quality check and load to Relativity, update index, and release to team. | 09 | 1.00 | \$525 | \$525.00 |
| 07/01/2025 | Thomas Sperber | Associate | Incorporate partner edits and thoughts to draft CMS responding to latest draft sent by Defendants | 13 | 2.50 | \$875 | \$2,187.50 |
| 07/01/2025 | Thomas Sperber | Associate | Review insurance documents; coordinate with junior attorney on analyzing insurance tower coverage, including meeting to talk through process | 09 | 2.50 | \$875 | \$2,187.50 |
| 07/02/2025 | Abygail Kritta | Associate | Draft joint case management statement and proposed order. | 13 | 7.00 | \$650 | \$4,550.00 |
| 07/02/2025 | Cindy Bomzer-Stein | Case Manager | Finalize and prepare for filing joint case management statement | 13 | 0.50 | \$450 | \$225.00 |
| 07/02/2025 | Cindy Bomzer-Stein | Case Manager | Prepare exhibit for filing regarding joint case management statement | 13 | 0.50 | \$450 | \$225.00 |
| 07/02/2025 | Cindy Bomzer-Stein | Case Manager | Cite check joint case management statement | 13 | 3.25 | \$450 | \$1,462.50 |
| 07/02/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 07/02/2025 | John Rizio-Hamilton | Partner | Case management statement/dispute. | 13 | 3.00 | \$1,800 | \$5,400.00 |
| 07/02/2025 | Katherine Sinderson | Partner | Case management statement | 13 | 0.75 | \$1,600 | \$1,200.00 |
| 07/02/2025 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, filed, docketed documents and calendared events. | 13 | 4.00 | \$500 | \$2,000.00 |
| 07/02/2025 | Thomas Sperber | Associate | Finalize and file Case Management Statement, including incorporating several rounds of partner edits and comments to, and drafting new arguments responding to new substantive arguments made in Defendants' sections of disputed issues | 13 | 7.25 | \$875 | \$6,343.75 |
| 07/03/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 07/03/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 07/03/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and notice, docketed document and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 07/06/2025 | Thomas Sperber | Associate | Draft outline for CMC arguments | 13 | 2.50 | \$875 | \$2,187.50 |
| 07/07/2025 | Abygail Kritta | Associate | Prepare for case management conference. | 13 | 0.50 | \$650 | \$325.00 |
| 07/07/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve latest docket filings from related cases | 15 | 0.50 | \$450 | \$225.00 |
| 07/07/2025 | Cindy Bomzer-Stein | Case Manager | Create subpoena requests chart regarding from the department of justice | 09 | 0.75 | \$450 | \$337.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 07/07/2025 | Katherine Sinderson | Partner | Prep for case management conference | 13 | 0.75 | \$1,600 | \$1,200.00 |
| 07/07/2025 | Thomas Sperber | Associate | Review DOJ subpoena and compare to our claims; review and analyze cases cited in Defendants' position statement re: Rule 12(c) stays and summarize findings in email to K. Sinderson | 08 | 4.00 | \$875 | \$3,500.00 |
| 07/09/2025 | Cindy Bomzer-Stein | Case Manager | Review related Department of Justice case for privilege log | 09 | 0.50 | \$450 | \$225.00 |
| 07/09/2025 | John Rizio-Hamilton | Partner | Case management conference/follow-up. | 13 | 1.50 | \$1,800 | \$2,700.00 |
| 07/09/2025 | Katherine Sinderson | Partner | Case management conference | 13 | 1.00 | \$1,600 | \$1,600.00 |
| 07/09/2025 | Mahiri Buffong | Managing Clerk | Reviewed documents and orders, docketed documents and calendared events. | 13 | 2.25 | \$500 | \$1,125.00 |
| 07/09/2025 | Roberto Santamarina | Litigation Support | Review of ESI protocol and provide feedback. | 08 | 1.00 | \$525 | \$525.00 |
| 07/09/2025 | Thomas Sperber | Associate | Review and revise draft protective order | 08 | 1.00 | \$875 | \$875.00 |
| 07/09/2025 | Thomas Sperber | Associate | Prepare materials for initial case management conference; attend case management conference; meeting with team to discuss conference outcomes and case schedule going forward | 13 | 1.50 | \$875 | \$1,312.50 |
| 07/11/2025 | Thomas Sperber | Associate | Review new case re: discovery stay in Rule 12(c) context | 08 | 0.50 | \$875 | \$437.50 |
| 07/14/2025 | Abygail Krita | Associate | Draft protective order and ESI protocol | 08 | 2.25 | \$650 | \$1,462.50 |
| 07/14/2025 | Abygail Krita | Associate | Review insurance tables and determine liability. | 14 | 1.00 | \$650 | \$650.00 |
| 07/14/2025 | Juan Lossada | Senior Staff Attorney | Begin preparation of FDA regulatory timeline for iRhythm, including collection and organization of relevant FDA correspondence and submissions | 09 | 4.00 | \$525 | \$2,100.00 |
| 07/14/2025 | Katherine Sinderson | Partner | Reviewing draft protective order | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 07/15/2025 | Abygail Krita | Associate | Draft protective order and ESI protocol and other related discovery documents. | 08 | 2.00 | \$650 | \$1,300.00 |
| 07/15/2025 | Cindy Bomzer-Stein | Case Manager | Create chart of defendants' responses and objections to first set of document requests | 09 | 0.75 | \$450 | \$337.50 |
| 07/15/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of timeline re disclosures, representation, and FDA related events. | 09 | 4.00 | \$525 | \$2,100.00 |
| 07/16/2025 | Abygail Krita | Associate | Draft protective order and ESI protocol and other related discovery documents. | 08 | 2.00 | \$650 | \$1,300.00 |
| 07/16/2025 | Cindy Bomzer-Stein | Case Manager | Finalize chart of defendants' responses and objections to first set of document requests | 09 | 0.75 | \$450 | \$337.50 |
| 07/16/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of timeline re disclosures, representations, and FDA-related events; start collection of supporting documents. | 09 | 4.00 | \$525 | \$2,100.00 |
| 07/16/2025 | Thomas Sperber | Associate | Weekly team call; revise and circulate to defendants draft protective order | 08 | 1.00 | \$875 | \$875.00 |
| 07/17/2025 | Cindy Bomzer-Stein | Case Manager | Research orders from Judge Corley regarding ESI disputes | 08 | 1.50 | \$450 | \$675.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 07/17/2025 | Juan Lossada | Senior Staff Attorney | Complete preparation of FDA related timeline and supporting documents. | 09 | 3.00 | \$525 | \$1,575.00 |
| 07/18/2025 | Cindy Bomzer-Stein | Case Manager | Research orders from Judge Corley regarding ESI disputes | 08 | 4.00 | \$450 | \$1,800.00 |
| 07/18/2025 | Juan Lossada | Senior Staff Attorney | Add a 'publicly available' date column to the FDA related timeline and research the publicly available dates for each entry on the timeline. | 09 | 3.25 | \$525 | \$1,706.25 |
| 07/18/2025 | Katherine Sinderson | Partner | MJOP review and discussion | 06 | 1.50 | \$1,600 | \$2,400.00 |
| 07/18/2025 | Thomas Sperber | Associate | Review and analyze defs MJOP; discuss opposition strategy with team | 06 | 2.50 | \$875 | \$2,187.50 |
| 07/19/2025 | Thomas Sperber | Associate | Closely review and analyze MJOP; draft high-level outline of arguments in response | 06 | 4.25 | \$875 | \$3,718.75 |
| 07/20/2025 | Abygail Krita | Associate | Review motion for judgment on the pleadings and distinguish cases. | 06 | 2.00 | \$650 | \$1,300.00 |
| 07/21/2025 | Abygail Krita | Associate | Discuss defendants' motion for judgment on the pleadings and case status. | 06 | 0.75 | \$650 | \$487.50 |
| 07/21/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited in request for judicial notice regarding the motion for judgment on the pleadings | 06 | 0.50 | \$450 | \$225.00 |
| 07/21/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited in motion for judgment on the pleadings | 06 | 0.75 | \$450 | \$337.50 |
| 07/21/2025 | John Rizio-Hamilton | Partner | Motion for judgment on the pleadings opposition | 06 | 1.75 | \$1,800 | \$3,150.00 |
| 07/21/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and answer, docketed document and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 07/21/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket, motion and supporting documents, docketed documents and calendared events. | 13 | 1.00 | \$500 | \$500.00 |
| 07/21/2025 | Sarah Schmidt | Associate | Attend meeting re: Rule 12(c) motion | 06 | 0.50 | \$600 | \$300.00 |
| 07/21/2025 | Thomas Sperber | Associate | Team meeting to discuss MJOP; meet with new junior associate to orient her to task; begin working on MJOP outline | 06 | 1.00 | \$875 | \$875.00 |
| 07/21/2025 | Thomas Sperber | Associate | Team meeting to discuss discovery stay joint letter | 08 | 0.50 | \$875 | \$437.50 |
| 07/22/2025 | Abygail Krita | Associate | Draft joint letter for motion to stay. | 08 | 1.75 | \$650 | \$1,137.50 |
| 07/22/2025 | Cindy Bomzer-Stein | Case Manager | Create joint stipulation shell regarding deadlines of request for judicial notice | 06 | 0.75 | \$450 | \$337.50 |
| 07/22/2025 | Cindy Bomzer-Stein | Case Manager | Draft and finalize transcript order form for case management conference | 13 | 0.50 | \$450 | \$225.00 |
| 07/22/2025 | Thomas Sperber | Associate | Draft outline of MJOP opp; meet with junior associates to discuss filling in sections and making progress | 06 | 6.00 | \$875 | \$5,250.00 |
| 07/23/2025 | Abygail Krita | Associate | Draft joint statement regarding discovery stay. | 08 | 1.75 | \$650 | \$1,137.50 |
| 07/23/2025 | Abygail Krita | Associate | Draft stipulation for extension for motion for judgment on the pleadings. | 06 | 1.50 | \$650 | \$975.00 |
| 07/23/2025 | Sarah Schmidt | Associate | Call with K. Sinderson re: letter brief | 08 | 0.25 | \$600 | \$150.00 |
| 07/23/2025 | Sarah Schmidt | Associate | Draft letter brief in opposition of stay | 08 | 4.50 | \$600 | \$2,700.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------|---|-----------|-------|---------|------------|
| 07/23/2025 | Thomas Sperber | Associate | Review R&Os in preparation of upcoming M&C | 09 | 1.75 | \$875 | \$1,531.25 |
| 07/23/2025 | Thomas Sperber | Associate | Coordinate with team on discovery stay letter | 08 | 0.50 | \$875 | \$437.50 |
| 07/23/2025 | Thomas Sperber | Associate | Coordinate with team on MJOP opp outline | 06 | 0.25 | \$875 | \$218.75 |
| 07/24/2025 | Abygail Krita | Associate | Draft joint statement regarding discovery stay and motion for judgment on the pleadings (3.5 hrs); meet and confer with defense counsel (0.5 hrs). | 08 | 4.00 | \$650 | \$2,600.00 |
| 07/24/2025 | Cindy Bomzer-Stein | Case Manager | Save transcript on iManage and Sharepoint regarding case management conference | 13 | 0.25 | \$450 | \$112.50 |
| 07/24/2025 | Sarah Schmidt | Associate | Draft letter in opposition of motion to stay | 08 | 4.50 | \$600 | \$2,700.00 |
| 07/24/2025 | Thomas Sperber | Associate | Revise and circulate joint letter draft re: discovery stay and discuss edits with K. Sinderson; prep for and lead initial M&C session re: RFP R&Os | 08 | 3.00 | \$875 | \$2,625.00 |
| 07/25/2025 | Abygail Krita | Associate | Draft joint statement regarding discovery stay (2.75 hrs); attend meet and confer with defense counsel (1 hr); memorialize meet and confer notes (1.5 hrs). | 08 | 5.25 | \$650 | \$3,412.50 |
| 07/25/2025 | Cindy Bomzer-Stein | Case Manager | Finalize joint stipulation regarding request for judicial notice for motion for judgment on the pleadings | 06 | 0.50 | \$450 | \$225.00 |
| 07/25/2025 | Jessica Lacon | Docket Clerk | Review order, reconcile and docket | 13 | 0.50 | \$450 | \$225.00 |
| 07/25/2025 | John Rizio-Hamilton | Partner | Letter to court | 08 | 1.00 | \$1,800 | \$1,800.00 |
| 07/25/2025 | Katherine Sinderson | Partner | Letter motion and meet and confer | 08 | 2.75 | \$1,600 | \$4,400.00 |
| 07/25/2025 | Sarah Schmidt | Associate | Draft letter in opposition to motion to stay | 08 | 3.75 | \$600 | \$2,250.00 |
| 07/25/2025 | Thomas Sperber | Associate | Prepare for continued M&C with defendants on R&Os; lead M&C | 08 | 2.00 | \$875 | \$1,750.00 |
| 07/25/2025 | Thomas Sperber | Associate | Coordinate on filing of joint stipulation to extend briefing on MJOP | 06 | 0.50 | \$875 | \$437.50 |
| 07/27/2025 | Abygail Krita | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 2.50 | \$650 | \$1,625.00 |
| 07/27/2025 | Thomas Sperber | Associate | Draft proposal email re: position on scope of discovery issues for discussion with team tomorrow | 08 | 0.50 | \$875 | \$437.50 |
| 07/28/2025 | Abygail Krita | Associate | Draft letter memorializing meet & confer | 08 | 2.75 | \$650 | \$1,787.50 |
| 07/28/2025 | Abygail Krita | Associate | Draft opposition to motion for judgment on the pleadings | 06 | 1.50 | \$650 | \$975.00 |
| 07/28/2025 | Cindy Bomzer-Stein | Case Manager | Draft proposed ESI order | 08 | 0.75 | \$450 | \$337.50 |
| 07/28/2025 | Cindy Bomzer-Stein | Case Manager | Cite check joint letter regarding Rule 12(c) motion | 08 | 2.50 | \$450 | \$1,125.00 |
| 07/28/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 07/28/2025 | Thomas Sperber | Associate | Call with team to discuss strategy on scope of discovery negotiations; coordinate with defense counsel re: M&C on interrogatories; review and revise joint letter re: discovery stay; work with junior associate on drafting memorialization letter for RFP M&C; review and revise draft ESI protocol | 08 | 2.75 | \$875 | \$2,406.25 |
| 07/29/2025 | Abygail Krita | Associate | Draft memorialization letter. | 08 | 2.00 | \$650 | \$1,300.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|----------------|---|-----------|-------|---------|------------|
| 07/29/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 2.00 | \$650 | \$1,300.00 |
| 07/29/2025 | Sarah Schmidt | Associate | Review Defendants' arguments in letter motion to stay discovery | 08 | 0.25 | \$600 | \$150.00 |
| 07/29/2025 | Sarah Schmidt | Associate | Draft opposition to motion for judgment on pleadings | 06 | 2.75 | \$600 | \$1,650.00 |
| 07/29/2025 | Thomas Sperber | Associate | Continued M&C on rog responses; draft and incorporate comments to revisions to joint statement re: discovery stay | 08 | 2.25 | \$875 | \$1,968.75 |
| 07/30/2025 | Abygail Kritta | Associate | Draft M&C memorialization letter. | 08 | 0.75 | \$650 | \$487.50 |
| 07/30/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 1.00 | \$650 | \$650.00 |
| 07/31/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 2.25 | \$650 | \$1,462.50 |
| 07/31/2025 | Thomas Sperber | Associate | Discuss MJOP opp plan with associate team | 06 | 0.25 | \$875 | \$218.75 |
| 07/31/2025 | Thomas Sperber | Associate | Review and revise M&C memorialization letter | 08 | 0.25 | \$875 | \$218.75 |
| 08/01/2025 | Abygail Kritta | Associate | Draft memorialization letter. | 08 | 2.00 | \$650 | \$1,300.00 |
| 08/01/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 2.75 | \$650 | \$1,787.50 |
| 08/01/2025 | Sarah Schmidt | Associate | Draft outline for opposition to Rule 12(c) motion | 06 | 0.25 | \$600 | \$150.00 |
| 08/01/2025 | Thomas Sperber | Associate | Review and comment on draft M&C memorialization letter | 08 | 0.50 | \$875 | \$437.50 |
| 08/04/2025 | Abygail Kritta | Associate | Draft memorialization letter for meet and confers | 08 | 2.50 | \$650 | \$1,625.00 |
| 08/04/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings | 06 | 6.75 | \$650 | \$4,387.50 |
| 08/05/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 7.75 | \$650 | \$5,037.50 |
| 08/05/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 08/05/2025 | Sarah Schmidt | Associate | Draft opposition to motion for judgment on the pleadings | 06 | 8.75 | \$600 | \$5,250.00 |
| 08/06/2025 | Abygail Kritta | Associate | Draft response letter to defendants regarding discovery | 08 | 7.00 | \$650 | \$4,550.00 |
| 08/06/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings | 06 | 1.75 | \$650 | \$1,137.50 |
| 08/06/2025 | Katherine Sinderson | Partner | MJOP Opp | 06 | 1.50 | \$1,600 | \$2,400.00 |
| 08/06/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and order, docketed document removed and updated calendared events. | 13 | 1.00 | \$500 | \$500.00 |
| 08/06/2025 | Sarah Schmidt | Associate | Draft opposition to motion for judgment on the pleadings | 06 | 9.50 | \$600 | \$5,700.00 |
| 08/07/2025 | Abygail Kritta | Associate | Draft response letter to defendants regarding discovery | 08 | 3.50 | \$650 | \$2,275.00 |
| 08/07/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings | 06 | 5.00 | \$650 | \$3,250.00 |
| 08/07/2025 | Katherine Sinderson | Partner | MJOP Opp | 06 | 1.50 | \$1,600 | \$2,400.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|---|-----------|-------|---------|------------|
| 08/08/2025 | Abygail Kritta | Associate | Draft response letter to defendants regarding discovery | 09 | 2.00 | \$650 | \$1,300.00 |
| 08/08/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings | 09 | 7.00 | \$650 | \$4,550.00 |
| 08/08/2025 | Katherine Sinderson | Partner | MJOP Opp | 06 | 1.75 | \$1,600 | \$2,800.00 |
| 08/08/2025 | Sarah Schmidt | Associate | Draft MJOP opposition | 06 | 3.00 | \$600 | \$1,800.00 |
| 08/08/2025 | Thomas Sperber | Associate | Review and revise discovery letter re: RFPs | 09 | 2.50 | \$875 | \$2,187.50 |
| 08/09/2025 | Katherine Sinderson | Partner | MJOP Opp | 06 | 2.00 | \$1,600 | \$3,200.00 |
| 08/09/2025 | Sarah Schmidt | Associate | Draft opposition to Rule 12(c) motion | 06 | 3.75 | \$600 | \$2,250.00 |
| 08/10/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 1.75 | \$650 | \$1,137.50 |
| 08/10/2025 | Sarah Schmidt | Associate | Draft opposition to Rule 12(c) motion | 06 | 4.50 | \$600 | \$2,700.00 |
| 08/11/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 1.75 | \$650 | \$1,137.50 |
| 08/11/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associate regarding filing plan for opposition to motion for judgment on the pleadings; Correspond with paralegal regarding draft | 06 | 0.75 | \$475 | \$356.25 |
| 08/11/2025 | Jessica Lacon | Docket Clerk | Review order, reconcile and docket | 13 | 0.25 | \$450 | \$112.50 |
| 08/11/2025 | Katherine Sinderson | Partner | MJOP Opp | 06 | 2.00 | \$1,600 | \$3,200.00 |
| 08/11/2025 | Sarah Schmidt | Associate | Draft Rule 12(c) opposition | 06 | 1.25 | \$600 | \$750.00 |
| 08/12/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 3.25 | \$650 | \$2,112.50 |
| 08/12/2025 | Sarah Schmidt | Associate | Draft Rule 12(c) opposition | 06 | 5.75 | \$600 | \$3,450.00 |
| 08/13/2025 | Abygail Kritta | Associate | Draft opposition to motion for judgment on the pleadings. | 06 | 5.00 | \$650 | \$3,250.00 |
| 08/13/2025 | Cindy Bomzer-Stein | Case Manager | Attend meeting with A. Kritta regarding opposition to motion for judgement on the pleading | 06 | 0.25 | \$450 | \$112.50 |
| 08/13/2025 | Cindy Bomzer-Stein | Case Manager | Cite check brief regarding response to motion for judgment on the pleadings | 06 | 8.25 | \$450 | \$3,712.50 |
| 08/13/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with paralegal regarding pending opposition to motion for judgment on the pleadings filing; Review rules, procedures, and docket, prepare filing plan for opposition to motion for judgment on the pleadings; Discuss filing plan meeting schedule with associates and paralegal | 06 | 2.00 | \$475 | \$950.00 |
| 08/13/2025 | Katherine Sinderson | Partner | MJOP opp | 06 | 2.25 | \$1,600 | \$3,600.00 |
| 08/13/2025 | Sarah Schmidt | Associate | Call with J. Rizio-Hamilton re: edits to MJOP brief | 06 | 0.75 | \$600 | \$450.00 |
| 08/13/2025 | Sarah Schmidt | Associate | Draft MJOP brief | 06 | 1.50 | \$600 | \$900.00 |
| 08/14/2025 | Abygail Kritta | Associate | Draft MJOP opposition. | 06 | 6.25 | \$650 | \$4,062.50 |
| 08/14/2025 | Cindy Bomzer-Stein | Case Manager | Cite check opposition brief regarding motion for judgment on the pleadings | 06 | 5.50 | \$450 | \$2,475.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|---|-----------|-------|---------|-------------|
| 08/14/2025 | Janielle Lattimore | Assistant Managing Clerk | Filing plan meeting | 06 | 0.50 | \$475 | \$237.50 |
| 08/14/2025 | Katherine Sinderson | Partner | MJOP opp | 06 | 5.75 | \$1,600 | \$9,200.00 |
| 08/14/2025 | Sarah Schmidt | Associate | Discuss MJOP opp with A. Kritta | 06 | 0.50 | \$600 | \$300.00 |
| 08/14/2025 | Thomas Sperber | Associate | Review, revise, and comment on draft MJOP opp. due tomorrow | 06 | 2.00 | \$875 | \$1,750.00 |
| 08/15/2025 | Abygail Kritta | Associate | Draft and file MJOP opposition. | 06 | 14.00 | \$650 | \$9,100.00 |
| 08/15/2025 | Cindy Bomzer-Stein | Case Manager | Edit and finalize brief regarding motion for judgment on the pleadings | 06 | 2.50 | \$450 | \$1,125.00 |
| 08/15/2025 | Cindy Bomzer-Stein | Case Manager | Cite check opposition additional edits in brief regarding motion for judgment on the pleadings | 06 | 3.50 | \$450 | \$1,575.00 |
| 08/15/2025 | Cindy Bomzer-Stein | Case Manager | Attend filing plan meeting regarding opposition to motion for judgement on the pleadings | 06 | 0.25 | \$450 | \$112.50 |
| 08/15/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with associate and case manager regarding pending filing; Follow up correspondence and monitor emails regarding status of documents; Electronic filing of opposition to motion for judgment on the pleadings | 06 | 2.25 | \$475 | \$1,068.75 |
| 08/15/2025 | Katherine Sinderson | Partner | MJOP opp | 06 | 14.75 | \$1,600 | \$23,600.00 |
| 08/15/2025 | Sarah Schmidt | Associate | Draft MJOP opp | 06 | 9.75 | \$600 | \$5,850.00 |
| 08/15/2025 | Sarah Schmidt | Associate | Proofread MJOP opp | 06 | 1.75 | \$600 | \$1,050.00 |
| 08/18/2025 | Abygail Kritta | Associate | Draft ESI protocol and protective order. | 08 | 3.00 | \$650 | \$1,950.00 |
| 08/18/2025 | Abygail Kritta | Associate | Draft work plan and summary for client. | 16 | 1.00 | \$650 | \$650.00 |
| 08/18/2025 | Cindy Bomzer-Stein | Case Manager | Organize motion papers and cases cited in iManage | 06 | 0.50 | \$450 | \$225.00 |
| 08/18/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited regarding opposition to motion for judgment on the pleadings | 06 | 0.50 | \$450 | \$225.00 |
| 08/18/2025 | Juan Lossada | Senior Staff Attorney | Review Exhibit B of Defendants' motion to dismiss and prepare chart with references to audits in Exhibit B. | 09 | 4.50 | \$525 | \$2,362.50 |
| 08/18/2025 | Katherine Sinderson | Partner | Protective order, ESI order, discovery letter, team call | 08 | 2.00 | \$1,600 | \$3,200.00 |
| 08/18/2025 | Katherine Sinderson | Partner | Revising discovery letter | 08 | 1.25 | \$1,600 | \$2,000.00 |
| 08/18/2025 | Thomas Sperber | Associate | Review filed MJOP opp | 06 | 0.50 | \$875 | \$437.50 |
| 08/18/2025 | Thomas Sperber | Associate | Calls with full team and junior associate re: discovery progress; review and send to defendants ESI protocol and protective order drafts; review discovery correspondence and propose strategy to move forward. | 08 | 3.50 | \$875 | \$3,062.50 |
| 08/18/2025 | Thomas Sperber | Associate | Draft client email to transmit RFPs and interrogatories directed to client | 16 | 0.50 | \$875 | \$437.50 |
| 08/19/2025 | Abygail Kritta | Associate | Draft discovery status summary. | 08 | 0.75 | \$650 | \$487.50 |
| 08/19/2025 | Cindy Bomzer-Stein | Case Manager | Research local and judge's rules regarding discovery disputes | 08 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|------------|
| 08/19/2025 | Cindy Bomzer-Stein | Case Manager | Create shells regarding responses to defendants' discovery requests | 09 | 1.50 | \$450 | \$675.00 |
| 08/19/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 08/19/2025 | Juan Lossada | Senior Staff Attorney | Complete information on potential work product references chart; make additional requested change including addition of column defining origination of each reference as either the FDA or iRhythm. | 09 | 3.00 | \$525 | \$1,575.00 |
| 08/19/2025 | Katherine Sinderson | Partner | Revising discovery letter; team calls | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 08/19/2025 | Thomas Sperber | Associate | Work on factual and legal research and outlining of motion to compel DOJ production; review and analyze staff attorney chart of references to audits and internal reviewed conducted referenced in motion to dismiss exhibits | 09 | 8.25 | \$875 | \$7,218.75 |
| 08/20/2025 | Abygail Krita | Associate | Draft letter to defendants regarding discovery. | 08 | 4.25 | \$650 | \$2,762.50 |
| 08/20/2025 | Amy Bitkower | Managing Director of Investigations | Former employee interview; conference with attorneys re same; drafting memo re interview | 01 | 3.25 | \$650 | \$2,112.50 |
| 08/20/2025 | Cindy Bomzer-Stein | Case Manager | Draft joint letter shell regarding discovery disputes | 08 | 0.25 | \$450 | \$112.50 |
| 08/20/2025 | Thomas Sperber | Associate | Work on draft discovery letter; team meeting. | 08 | 1.25 | \$875 | \$1,093.75 |
| 08/20/2025 | Thomas Sperber | Associate | Review, analyze, and circulate helpful points along with analysis from research report; coordinate with staff to collect all documents cited in SAC for production; | 09 | 8.25 | \$875 | \$7,218.75 |
| 08/20/2025 | Thomas Sperber | Associate | Call with former employee to discuss process | 01 | 0.50 | \$875 | \$437.50 |
| 08/21/2025 | Abygail Krita | Associate | Draft letter to defendants regarding discovery | 08 | 4.50 | \$650 | \$2,925.00 |
| 08/21/2025 | Juan Lossada | Senior Staff Attorney | Check all cites in SAC for document support. | 09 | 4.00 | \$525 | \$2,100.00 |
| 08/21/2025 | Katherine Sinderson | Partner | Revising discovery letter | 08 | 1.25 | \$1,600 | \$2,000.00 |
| 08/21/2025 | Katherine Sinderson | Partner | Revising discovery emails and call with defendants | 08 | 2.75 | \$1,600 | \$4,400.00 |
| 08/21/2025 | Thomas Sperber | Associate | Work on discovery letter; review defendants' edits and comments to protective order and ESI Protocol and discuss with team | 08 | 3.00 | \$875 | \$2,625.00 |
| 08/21/2025 | Thomas Sperber | Associate | Begin working on search term proposal | 09 | 0.50 | \$875 | \$437.50 |
| 08/22/2025 | Abygail Krita | Associate | Draft RFPs and interrogatories; draft initial search terms. | 09 | 5.00 | \$650 | \$3,250.00 |
| 08/22/2025 | Juan Lossada | Senior Staff Attorney | Continue checking all cites in SAC for document support. | 09 | 4.50 | \$525 | \$2,362.50 |
| 08/22/2025 | Thomas Sperber | Associate | Discuss letter response to Defendants re: discovery disputes; work with junior associate on letter response | 08 | 1.75 | \$875 | \$1,531.25 |
| 08/24/2025 | Juan Lossada | Senior Staff Attorney | Continue verifying all cites in SAC for document support up through paragraph 71. | 09 | 2.00 | \$525 | \$1,050.00 |
| 08/25/2025 | Abygail Krita | Associate | Draft search terms and RFPs and ROG responses. | 09 | 2.00 | \$650 | \$1,300.00 |
| 08/25/2025 | Juan Lossada | Senior Staff Attorney | Continue verifying all cites in SAC for document support up through paragraph 116. | 09 | 5.25 | \$525 | \$2,756.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|------------|
| 08/25/2025 | Thomas Sperber | Associate | Prepare for and lead M&C on ESI protocol and Protective order | 08 | 1.50 | \$875 | \$1,312.50 |
| 08/25/2025 | Thomas Sperber | Associate | Draft, revise, and edit search term proposals and work with junior associate to finalize and send to Defendants | 09 | 4.50 | \$875 | \$3,937.50 |
| 08/26/2025 | Abygail Kritta | Associate | Draft search terms and RFPs and interrogatory responses. | 09 | 2.00 | \$650 | \$1,300.00 |
| 08/26/2025 | Juan Lossada | Senior Staff Attorney | Continue checking all cites in SAC for document support up through paragraph 162. | 09 | 4.50 | \$525 | \$2,362.50 |
| 08/27/2025 | Amy Bitkower | Managing Director of Investigations | Provided attys with former employee info. | 01 | 0.25 | \$650 | \$162.50 |
| 08/27/2025 | Juan Lossada | Senior Staff Attorney | Continue checking all cites in SAC for document support up through paragraph 206. | 09 | 4.25 | \$525 | \$2,231.25 |
| 08/27/2025 | Katherine Sinderson | Partner | Team meeting | 09 | 0.50 | \$1,600 | \$800.00 |
| 08/28/2025 | Juan Lossada | Senior Staff Attorney | Continue checking all cites in SAC for document support up through paragraph 232. | 09 | 4.00 | \$525 | \$2,100.00 |
| 08/28/2025 | Thomas Sperber | Associate | Work on draft R&Os and outstanding discovery issues | 09 | 2.25 | \$875 | \$1,968.75 |
| 08/29/2025 | Abygail Kritta | Associate | Draft response and objections to Defendants' first set of RFPs and interrogatories. | 09 | 7.00 | \$650 | \$4,550.00 |
| 08/29/2025 | Cindy Bomzer-Stein | Case Manager | Review complaint sources for production | 09 | 6.00 | \$450 | \$2,700.00 |
| 08/29/2025 | Cindy Bomzer-Stein | Case Manager | Upload to iManage defendants' responses to document requests | 09 | 0.25 | \$450 | \$112.50 |
| 08/29/2025 | Juan Lossada | Senior Staff Attorney | Complete checking of all cites in SAC for document support and complete preparation of chart re same. | 09 | 1.25 | \$525 | \$656.25 |
| 08/29/2025 | Thomas Sperber | Associate | Work with junior associate on draft R&Os to RFPs and interrogatories. | 09 | 2.00 | \$875 | \$1,750.00 |
| 08/29/2025 | Thomas Sperber | Associate | Draft response to defendants re: finalizing protective order and ESI protocol and outstanding discovery disputes | 08 | 2.00 | \$875 | \$1,750.00 |
| 09/01/2025 | Thomas Sperber | Associate | Review email correspondence with defendants and notes on prior M&Cs to confirm mischaracterization by defendants in email | 08 | 0.50 | \$875 | \$437.50 |
| 09/02/2025 | Abygail Kritta | Associate | Draft responses and objections to Defendants' RFPs and interrogatories. | 09 | 4.75 | \$650 | \$3,087.50 |
| 09/02/2025 | Abygail Kritta | Associate | Draft stipulation for Zoom hearing. | 06 | 0.50 | \$650 | \$325.00 |
| 09/02/2025 | Cindy Bomzer-Stein | Case Manager | Research Judge Corley's rules regarding stipulation to modify hearing for motion for judgment on the pleadings | 06 | 0.25 | \$450 | \$112.50 |
| 09/02/2025 | Cindy Bomzer-Stein | Case Manager | Draft stipulation regarding motion for judgment on the pleadings hearing | 06 | 1.25 | \$450 | \$562.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|---|-----------|-------|---------|------------|
| 09/02/2025 | Thomas Sperber | Associate | Review and revise draft R&Os to RFPs and interrogatories towards plaintiffs; work with paralegals on collecting documents cited in complaint to be produced | 09 | 2.50 | \$875 | \$2,187.50 |
| 09/02/2025 | Thomas Sperber | Associate | Draft joint stipulation to do MJOP motion hearing by Zoom | 06 | 0.50 | \$875 | \$437.50 |
| 09/03/2025 | Abygail Krita | Associate | Draft RFPs and interrogatories. | 09 | 2.50 | \$650 | \$1,625.00 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Draft declaration regarding proposed protective order | 08 | 1.75 | \$450 | \$787.50 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Draft shell regarding motion to modify hearing regarding motion for judgment on the pleading | 06 | 0.75 | \$450 | \$337.50 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Research unopposed motions to modify hearing regarding motion for judgment on the pleading | 06 | 0.50 | \$450 | \$225.00 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Research examples of declarations regarding proposed discovery filings | 08 | 0.75 | \$450 | \$337.50 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Review proposed electronically stored information protocol | 08 | 0.75 | \$450 | \$337.50 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Review joint proposed protective order | 08 | 0.75 | \$450 | \$337.50 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Draft shell regarding case management statement | 13 | 0.50 | \$450 | \$225.00 |
| 09/03/2025 | Cindy Bomzer-Stein | Case Manager | Research examples regarding case management statement | 13 | 1.75 | \$450 | \$787.50 |
| 09/03/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case manager and managing clerk regarding pending filing | 06 | 0.75 | \$475 | \$356.25 |
| 09/03/2025 | Juan Lossada | Senior Staff Attorney | Start project re identification of potential third parties to subpoena for iRhythm and preparation of discovery index chart. | 09 | 2.75 | \$525 | \$1,443.75 |
| 09/03/2025 | Katherine Sinderson | Partner | Calls/emails with counsel and administrative motion to shift hearing to Zoom | 06 | 2.00 | \$1,600 | \$3,200.00 |
| 09/03/2025 | Thomas Sperber | Associate | Draft joint stipulation and circulate to defendants re: conducting hearing by Zoom; re-draft as unopposed motion for Zoom hearing | 06 | 0.75 | \$875 | \$656.25 |
| 09/03/2025 | Thomas Sperber | Associate | Email correspondence re: protective order / ESI protocol and discovery disputes; weekly team meeting | 08 | 2.25 | \$875 | \$1,968.75 |
| 09/04/2025 | Abygail Krita | Associate | Draft joint case management statement. | 13 | 2.00 | \$650 | \$1,300.00 |
| 09/04/2025 | Cindy Bomzer-Stein | Case Manager | Finalize motion to modify hearing regarding motion for judgment on the pleading | 06 | 1.00 | \$450 | \$450.00 |
| 09/04/2025 | Cindy Bomzer-Stein | Case Manager | Draft declaration regarding ESI order | 08 | 2.50 | \$450 | \$1,125.00 |
| 09/04/2025 | Cindy Bomzer-Stein | Case Manager | Draft declaration regarding stipulated protective order | 08 | 1.25 | \$450 | \$562.50 |
| 09/04/2025 | Janielle Lattimore | Assistant Managing Clerk | Electronic filing of Motion to Modify Hearing | 06 | 1.50 | \$475 | \$712.50 |
| 09/04/2025 | Juan Lossada | Senior Staff Attorney | Continue project research re identification of potential third parties to subpoena, and preparation of chart re potential key players. | 09 | 5.00 | \$525 | \$2,625.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|---|-----------|-------|---------|------------|
| 09/04/2025 | Katherine Sinderson | Partner | Case management statement & administrative motion to shift hearing to Zoom | 13 | 3.00 | \$1,600 | \$4,800.00 |
| 09/04/2025 | Mahiri Buffong | Managing Clerk | Reviewed document for filing compliance. Assisted with filing. | 13 | 1.00 | \$500 | \$500.00 |
| 09/04/2025 | Thomas Sperber | Associate | Draft, review, and revise unopposed motion for hearing by Zoom | 06 | 0.75 | \$875 | \$656.25 |
| 09/04/2025 | Thomas Sperber | Associate | Revise and circulate to J. Rizio-Hamilton for review joint CMS raising discovery disputes; prepare for and lead M&C | 08 | 5.50 | \$875 | \$4,812.50 |
| 09/05/2025 | Abygail Kritta | Associate | Draft joint stipulation for scheduling hearing. | 13 | 2.50 | \$650 | \$1,625.00 |
| 09/05/2025 | Cindy Bomzer-Stein | Case Manager | Organize and send analyst reports to expert M. Cain | 11 | 0.75 | \$450 | \$337.50 |
| 09/05/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case manager regarding pending filing; Electronic filing of reply in further support of motion to modify hearing | 13 | 0.75 | \$475 | \$356.25 |
| 09/05/2025 | Juan Lossada | Senior Staff Attorney | Complete project research re identification of potential third parties to subpoena and concurrent preparation of chart of key players. | 09 | 4.25 | \$525 | \$2,231.25 |
| 09/05/2025 | Katherine Sinderson | Partner | Case management statement/response to motion | 13 | 2.75 | \$1,600 | \$4,400.00 |
| 09/05/2025 | Thomas Sperber | Associate | Draft and file response to defendants' argumentative non-opposition to motion for Zoom hearing; review, analyze, and discuss defs' reply in further support of MJOP | 06 | 2.00 | \$875 | \$1,750.00 |
| 09/08/2025 | Cindy Bomzer-Stein | Case Manager | Research case management statements before Judge Corley for T. Sperber | 13 | 3.75 | \$450 | \$1,687.50 |
| 09/08/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited in reply regarding motion for judgement on the pleadings | 06 | 0.50 | \$450 | \$225.00 |
| 09/08/2025 | Juan Lossada | Senior Staff Attorney | Continue search for identities of third party consultants for subpoenas. | 09 | 4.00 | \$525 | \$2,100.00 |
| 09/08/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and orders, docketed documents and adjourned calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 09/09/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 09/09/2025 | Juan Lossada | Senior Staff Attorney | Continue research for identities of third party consultants hired by iRhythm and prepare final report/answer on the same; review iRhythms R&O's and run quick searches on the entities identified as consultants. | 09 | 2.75 | \$525 | \$1,443.75 |
| 09/09/2025 | Katherine Sinderson | Partner | Case management statement | 13 | 2.00 | \$1,600 | \$3,200.00 |
| 09/09/2025 | Thomas Sperber | Associate | Review defs edits to joint CMS re: discovery disputes and discuss with team; draft bullet points on additional edits to our sections for J. Rizio-Hamilton review | 08 | 1.00 | \$875 | \$875.00 |
| 09/09/2025 | Thomas Sperber | Associate | Review staff attorney chart of documents collected cited in the complaint for production to defendants and provide missing documents | 09 | 1.00 | \$875 | \$875.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|---|-----------|-------|---------|------------|
| 09/09/2025 | Thomas Sperber | Associate | Review investigator memo of former employee call and provide comments | 01 | 1.00 | \$875 | \$875.00 |
| 09/10/2025 | Abygail Krita | Associate | Draft and file joint case management statement. | 13 | 3.00 | \$650 | \$1,950.00 |
| 09/10/2025 | Cindy Bomzer-Stein | Case Manager | Finalize joint case management statement for filing | 13 | 0.75 | \$450 | \$337.50 |
| 09/10/2025 | Cindy Bomzer-Stein | Case Manager | Cite check joint case management statement | 13 | 2.50 | \$450 | \$1,125.00 |
| 09/10/2025 | Cindy Bomzer-Stein | Case Manager | Draft sealing motion regarding joint case management statement | 13 | 2.50 | \$450 | \$1,125.00 |
| 09/10/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve exhibits regarding joint case management statement | 13 | 0.50 | \$450 | \$225.00 |
| 09/10/2025 | Janielle Lattimore | Assistant Managing Clerk | Electronic filing of joint case management statement | 13 | 1.25 | \$475 | \$593.75 |
| 09/10/2025 | Katherine Sinderson | Partner | Finalize case management statement | 13 | 1.75 | \$1,600 | \$2,800.00 |
| 09/10/2025 | Katherine Sinderson | Partner | R&Os to discovery | 09 | 4.00 | \$1,600 | \$6,400.00 |
| 09/10/2025 | Thomas Sperber | Associate | Revise and circulate drafts of joint case management statement including discovery disputes back and forth with opposing counsel; review and revise drafts of sealing papers; coordinate to be filed final CMS | 08 | 4.25 | \$875 | \$3,718.75 |
| 09/10/2025 | Thomas Sperber | Associate | Edits to plaintiffs' discovery R&Os | 09 | 1.50 | \$875 | \$1,312.50 |
| 09/11/2025 | Abygail Krita | Associate | Draft R&Os. | 09 | 2.50 | \$650 | \$1,625.00 |
| 09/11/2025 | Cindy Bomzer-Stein | Case Manager | Upload discovery requests and communication to iManage | 09 | 0.25 | \$450 | \$112.50 |
| 09/11/2025 | Katherine Sinderson | Partner | Prep for case management conference; R&Os to discovery | 13 | 3.75 | \$1,600 | \$6,000.00 |
| 09/12/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 09/15/2025 | Abygail Krita | Associate | Finalize document production. | 09 | 0.75 | \$650 | \$487.50 |
| 09/15/2025 | Cindy Bomzer-Stein | Case Manager | Upload complaint sources to Relativity regarding production | 09 | 2.00 | \$450 | \$900.00 |
| 09/15/2025 | Cindy Bomzer-Stein | Case Manager | Review complaint sources for production | 09 | 3.50 | \$450 | \$1,575.00 |
| 09/15/2025 | Katherine Sinderson | Partner | Discovery re court order-search terms | 09 | 0.50 | \$1,600 | \$800.00 |
| 09/15/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket, order, docketed document and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 09/15/2025 | Roberto Santamarina | Litigation Support | Process of complaint source documents into reviewable format. Quality check and load to relativity. Update index, run scripts, and release. | 09 | 1.00 | \$525 | \$525.00 |
| 09/15/2025 | Thomas Sperber | Associate | Work with team to prepare for production documents cited in complaint; review production and identify missing documents, work with team to include; create to-do list for tomorrow and send to junior associate to organize action list | 09 | 2.00 | \$875 | \$1,750.00 |
| 09/16/2025 | Abygail Krita | Associate | Draft cover letter for production; draft search term protocol; draft third party subpoenas; meet and confer with defendants. | 09 | 5.25 | \$650 | \$3,412.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|--|-----------|-------|---------|------------|
| 09/16/2025 | Adam Weinschel | Director of Investor Services | Reviewed lead plaintiff trades; discussions with financial analyst team re: bank statements; reviewed statements | 09 | 0.50 | \$650 | \$325.00 |
| 09/16/2025 | Cindy Bomzer-Stein | Case Manager | Review and revise document production to defendants | 09 | 2.00 | \$450 | \$900.00 |
| 09/16/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 09/16/2025 | Katherine Sinderson | Partner | Negotiating in-person meet and confer, meet and confer | 08 | 2.25 | \$1,600 | \$3,600.00 |
| 09/16/2025 | Roberto Santamarina | Litigation Support | Production of documents (LP_IRHYTHM_001). | 09 | 2.25 | \$525 | \$1,181.25 |
| 09/16/2025 | Thomas Sperber | Associate | Review initial documents for production and finalize; coordinate with team to produce first production to defendants; draft and circulate to junior associate list of to-do items for rest of week | 09 | 2.25 | \$875 | \$1,968.75 |
| 09/16/2025 | Thomas Sperber | Associate | Prepare for and lead M&C | 08 | 2.25 | \$875 | \$1,968.75 |
| 09/17/2025 | Abygail Krita | Associate | Coordinate former employee outreach | 01 | 0.75 | \$650 | \$487.50 |
| 09/17/2025 | Abygail Krita | Associate | Draft third party subpoenas. | 09 | 1.75 | \$650 | \$1,137.50 |
| 09/17/2025 | Cindy Bomzer-Stein | Case Manager | Revise subpoena forms regarding third party subpoenas | 09 | 1.50 | \$450 | \$675.00 |
| 09/17/2025 | Cindy Bomzer-Stein | Case Manager | Draft Schedule A for multiple entities and individuals regarding third party subpoenas | 09 | 1.00 | \$450 | \$450.00 |
| 09/17/2025 | Cindy Bomzer-Stein | Case Manager | Upload discovery correspondence to iManage | 08 | 0.50 | \$450 | \$225.00 |
| 09/17/2025 | Cindy Bomzer-Stein | Case Manager | Draft schedule A shell regarding subpoenas | 09 | 0.75 | \$450 | \$337.50 |
| 09/17/2025 | Cindy Bomzer-Stein | Case Manager | Upload to iManage additional complaint sources for production | 09 | 0.50 | \$450 | \$225.00 |
| 09/17/2025 | Juan Lossada | Senior Staff Attorney | Research contact information for the entities being subpoenaed. | 09 | 2.00 | \$525 | \$1,050.00 |
| 09/17/2025 | Katherine Sinderson | Partner | Team meeting | 09 | 1.75 | \$1,600 | \$2,800.00 |
| 09/17/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed document and updated calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 09/17/2025 | Thomas Sperber | Associate | Revise search terms drafted by junior associate; coordinate with team on serving subpoenas on third parties newly-disclosed by defendants | 09 | 7.00 | \$875 | \$6,125.00 |
| 09/17/2025 | Thomas Sperber | Associate | Draft and send to defendants email re: status of discovery and accompanying comprehensive search protocol proposal for Defendants' discovery | 08 | 1.25 | \$875 | \$1,093.75 |
| 09/17/2025 | Thomas Sperber | Associate | Work with investigations team on reaching out to former employee witnesses re: disclosing names to Defs | 01 | 1.00 | \$875 | \$875.00 |
| 09/18/2025 | Abygail Krita | Associate | Review transaction records and prepare for production; draft notices of subpoena and subpoenas. | 09 | 3.00 | \$650 | \$1,950.00 |
| 09/18/2025 | Abygail Krita | Associate | Coordinate outreach to former employees. | 01 | 0.75 | \$650 | \$487.50 |
| 09/18/2025 | Amy Bitkower | Managing Director of Investigations | Memo prep; atty conf | 01 | 1.00 | \$650 | \$650.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 09/18/2025 | Cindy Bomzer-Stein | Case Manager | Update and finalize third party subpoenas of several entities and individuals | 09 | 2.50 | \$450 | \$1,125.00 |
| 09/18/2025 | Jessica Lacon | Docket Clerk | Corresponding with team; handling subpoena services, corresponding with vendors; | 09 | 3.25 | \$450 | \$1,462.50 |
| 09/18/2025 | Juan Lossada | Senior Staff Attorney | Assist with location of business address of third party for discovery subpoena after personal address fails. | 09 | 1.00 | \$525 | \$525.00 |
| 09/18/2025 | Katherine Sinderson | Partner | Messages with team re discovery and correspondence with defendants | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 09/18/2025 | Mahiri Buffong | Managing Clerk | Arranged for service on multiple parties. | 09 | 1.25 | \$500 | \$625.00 |
| 09/18/2025 | Thomas Sperber | Associate | Draft and send correspondence to Defendants on multiple issues including former employees. | 01 | 1.50 | \$875 | \$1,312.50 |
| 09/18/2025 | Thomas Sperber | Associate | Work with team on serving third party subpoenas; review and prepare to produce client trading records; work with junior associate on serving amended subpoena notices | 09 | 2.50 | \$875 | \$2,187.50 |
| 09/19/2025 | Abygail Kritta | Associate | Finalize document production; finalize and serve subpoenas. | 09 | 3.50 | \$650 | \$2,275.00 |
| 09/19/2025 | Abygail Kritta | Associate | Draft protective order and ESI protocol and correspond with defendants on declarations. | 08 | 2.50 | \$650 | \$1,625.00 |
| 09/19/2025 | Cindy Bomzer-Stein | Case Manager | Prepare documents for production | 09 | 1.00 | \$450 | \$450.00 |
| 09/19/2025 | Cindy Bomzer-Stein | Case Manager | Upload discovery documents onto SharePoint and organize discovery folder on SharePoint | 09 | 1.25 | \$450 | \$562.50 |
| 09/19/2025 | Cindy Bomzer-Stein | Case Manager | Review FDA production | 09 | 1.00 | \$450 | \$450.00 |
| 09/19/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoena tracker | 09 | 0.75 | \$450 | \$337.50 |
| 09/19/2025 | Cindy Bomzer-Stein | Case Manager | Update declarations regarding proposed protective order and electronically stored information protocol | 08 | 0.75 | \$450 | \$337.50 |
| 09/19/2025 | Cindy Bomzer-Stein | Case Manager | Research and update third party subpoena regarding R. Lawson | 09 | 1.00 | \$450 | \$450.00 |
| 09/19/2025 | Jessica Lacon | Docket Clerk | Corresponding with team and service vendors; initiate case track United States of America v. iRhythm Technologies, Inc. , Docket No. 25-3736 (9th Cir. Jun 13, 2025) for K. Sinderson, T. Sperber, A. Kritta. and C. Bomzer-Stein | 13 | 1.25 | \$450 | \$562.50 |
| 09/19/2025 | Juan Lossada | Senior Staff Attorney | Research updated business or home address for third party subpoena. | 09 | 0.50 | \$525 | \$262.50 |
| 09/19/2025 | Katherine Sinderson | Partner | Discussions re protective order | 08 | 4.50 | \$1,600 | \$7,200.00 |
| 09/19/2025 | Laura Marvelli | Senior Investigator | Case discussion, finding old former employees and calling with case update | 01 | 1.00 | \$500 | \$500.00 |
| 09/19/2025 | Roberto Santamarina | Litigation Support | Production of documents (LP_IRHYTHM_002). | 09 | 1.00 | \$525 | \$525.00 |
| 09/19/2025 | Thomas Sperber | Associate | Finalize and serve production of documents to defendants; draft, finalize, and serve on Defendants document disclosing names of former employees | 09 | 4.00 | \$875 | \$3,500.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 09/19/2025 | Thomas Sperber | Associate | Call with opposing counsel re: approach for ESI Protocol and protective order declarations; correspond with Defendants re: ESI Protocol and protective order revisions | 08 | 0.75 | \$875 | \$656.25 |
| 09/22/2025 | Abygail Kritta | Associate | Draft response to memorialization of meet and confer letter. | 08 | 6.25 | \$650 | \$4,062.50 |
| 09/22/2025 | Jessica Lacon | Docket Clerk | Correspond with team; subpoena; docket | 09 | 1.00 | \$450 | \$450.00 |
| 09/22/2025 | Juan Lossada | Senior Staff Attorney | Access former employee's communications & emails and convert into one pdf. | 09 | 0.25 | \$525 | \$131.25 |
| 09/22/2025 | Katherine Sinderson | Partner | Correspondence with defense counsel regarding discovery schedule and document production | 08 | 1.25 | \$1,600 | \$2,000.00 |
| 09/22/2025 | Laura Marvelli | Senior Investigator | Updating folders on case communications | 13 | 0.25 | \$500 | \$125.00 |
| 09/23/2025 | Abygail Kritta | Associate | Draft response letter to Defendants memorialization of meet and confer; draft protective order and declarations. | 08 | 8.00 | \$650 | \$5,200.00 |
| 09/23/2025 | Jessica Lacon | Docket Clerk | Speaking/corresponding with servers; updating teams re services; Review email and Docket and Diary relevant dates and deadlines | 09 | 0.75 | \$450 | \$337.50 |
| 09/23/2025 | Matthew Mahady | Case Manager | Review and edit list of seven-year PSLRA history of Oklahoma Firefighters; email results to litigation attorneys | 14 | 1.25 | \$450 | \$562.50 |
| 09/23/2025 | Thomas Sperber | Associate | Review and revise draft letter response re: discovery directed towards Lead Plaintiff | 09 | 1.25 | \$875 | \$1,093.75 |
| 09/23/2025 | Toby Saviano | Case Manager | Respond to attorney requests for documents and information. | 13 | 0.50 | \$450 | \$225.00 |
| 09/24/2025 | Abygail Kritta | Associate | Draft protective order and ESI protocols. | 08 | 1.00 | \$650 | \$650.00 |
| 09/24/2025 | Abygail Kritta | Associate | Draft subpoenas; attend weekly meeting | 09 | 1.25 | \$650 | \$812.50 |
| 09/24/2025 | Abygail Kritta | Associate | Research class certification motions. | 07 | 1.00 | \$650 | \$650.00 |
| 09/24/2025 | Jessica Lacon | Docket Clerk | Corresponding with server and team re subpoena service | 09 | 0.25 | \$450 | \$112.50 |
| 09/24/2025 | Katherine Sinderson | Partner | Discussions re discovery and protective order | 08 | 2.50 | \$1,600 | \$4,000.00 |
| 09/24/2025 | Laura Marvelli | Senior Investigator | Two calls with former employees - one with attorneys | 01 | 0.75 | \$500 | \$375.00 |
| 09/24/2025 | Thomas Sperber | Associate | Calls with former employees; review chronology of former employee communications and summarize findings for team | 01 | 2.50 | \$875 | \$2,187.50 |
| 09/24/2025 | Thomas Sperber | Associate | Weekly team meeting; review and revise declarations ISO protective order and ESI protocol; review, revise, and incorporate K. Sinderson edits to letter response re: Plaintiff discovery | 08 | 2.25 | \$875 | \$1,968.75 |
| 09/25/2025 | Abygail Kritta | Associate | Draft protective order, ESI protocol and declarations. | 08 | 1.25 | \$650 | \$812.50 |
| 09/25/2025 | Abygail Kritta | Associate | Correspond with defendants on search terms; draft subpoenas and update subpoena charts. | 09 | 2.75 | \$650 | \$1,787.50 |
| 09/25/2025 | Cindy Bomzer-Stein | Case Manager | Update notice regarding third party subpoenas | 09 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|---|-----------|-------|---------|------------|
| 09/25/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoenas | 09 | 0.50 | \$450 | \$225.00 |
| 09/25/2025 | Jacob Foster | Investigator | iRhythm address searches | 01 | 2.00 | \$400 | \$800.00 |
| 09/25/2025 | Katherine Sinderson | Partner | Call with damages expert | 11 | 0.50 | \$1,600 | \$800.00 |
| 09/25/2025 | Laura Marvelli | Senior Investigator | Call with former iRhythm employee, researching addresses for subpoena | 01 | 1.00 | \$500 | \$500.00 |
| 09/25/2025 | Thomas Sperber | Associate | Call with damages expert to discuss class cert motion report | 11 | 0.50 | \$875 | \$437.50 |
| 09/26/2025 | Abygail Krita | Associate | Draft protective order, ESI protocol, and accompanying declarations; correspond with defendants. | 08 | 4.00 | \$650 | \$2,600.00 |
| 09/26/2025 | Abygail Krita | Associate | Notice and serve subpoenas. | 09 | 2.75 | \$650 | \$1,787.50 |
| 09/26/2025 | Cindy Bomzer-Stein | Case Manager | Revise declarations regarding ESI protocol and protective order | 08 | 0.50 | \$450 | \$225.00 |
| 09/26/2025 | Jacob Foster | Investigator | iRhythm address checking | 01 | 1.00 | \$400 | \$400.00 |
| 09/26/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case manager and associate regarding pending filing | 08 | 0.50 | \$475 | \$237.50 |
| 09/26/2025 | Jessica Lacon | Docket Clerk | Corresponding with team and vendors; handling subpoena service | 09 | 1.00 | \$450 | \$450.00 |
| 09/26/2025 | Thomas Sperber | Associate | Work with junior associate on finalizing protective order and ESI protocol drafts | 08 | 1.00 | \$875 | \$875.00 |
| 09/29/2025 | Abygail Krita | Associate | Draft responses to subpoena recipients and create correspondence tracker. | 09 | 1.50 | \$650 | \$975.00 |
| 09/29/2025 | Abygail Krita | Associate | Draft and file declarations for protective order / ESI. | 08 | 1.25 | \$650 | \$812.50 |
| 09/29/2025 | Cindy Bomzer-Stein | Case Manager | Finalize for filing regarding stipulated protective order and stipulated ESI protocol | 08 | 0.50 | \$450 | \$225.00 |
| 09/29/2025 | Cindy Bomzer-Stein | Case Manager | Revise joint declarations regarding stipulated protective order and ESI protocol | 08 | 0.50 | \$450 | \$225.00 |
| 09/29/2025 | Janielle Lattimore | Assistant Managing Clerk | Electronic filing of stipulated protective order and stipulated ESI protocol | 08 | 2.00 | \$475 | \$950.00 |
| 09/29/2025 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance. | 08 | 0.75 | \$500 | \$375.00 |
| 09/29/2025 | Thomas Sperber | Associate | Draft and send emails re: timing on defendants' search protocol counter-proposal; review, discuss with team, and analyze discovery correspondence and search protocol counter-proposal; draft response correspondence | 08 | 2.50 | \$875 | \$2,187.50 |
| 09/30/2025 | Abygail Krita | Associate | Prepare for meet and confer; meet and confer with defense counsel. | 08 | 2.00 | \$650 | \$1,300.00 |
| 09/30/2025 | Cindy Bomzer-Stein | Case Manager | Communicate with managing clerk's office regarding service of third party subpoenas | 09 | 0.50 | \$450 | \$225.00 |
| 09/30/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoena chart | 09 | 0.50 | \$450 | \$225.00 |
| 09/30/2025 | Cindy Bomzer-Stein | Case Manager | Upload discovery responses to iManage and Sharepoint | 08 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 09/30/2025 | Jessica Lacon | Docket Clerk | Corresponding with serves and updating team re subpoena services; | 09 | 0.75 | \$450 | \$337.50 |
| 09/30/2025 | Juan Lossada | Senior Staff Attorney | Research proposed custodians provided by defendants and prepare report re same; review FDA Form 483s and other public documents for additional relevant custodians and prepare report re same. | 09 | 4.75 | \$525 | \$2,493.75 |
| 09/30/2025 | Katherine Sinderson | Partner | Meet and confer | 08 | 1.25 | \$1,600 | \$2,000.00 |
| 09/30/2025 | Thomas Sperber | Associate | Analyze list of defendants' proposed custodians and circulate thoughts; prep for and lead M&C on defendants' discovery disputes | 08 | 3.50 | \$875 | \$3,062.50 |
| 10/01/2025 | Abygail Krita | Associate | Draft responses and monitor subpoenas | 09 | 4.00 | \$650 | \$2,600.00 |
| 10/01/2025 | Abygail Krita | Associate | Draft memorialization letter of meet and confer. | 08 | 1.50 | \$650 | \$975.00 |
| 10/01/2025 | Cindy Bomzer-Stein | Case Manager | Create shell regarding opening brief regarding class certification motion | 07 | 0.50 | \$450 | \$225.00 |
| 10/01/2025 | Cindy Bomzer-Stein | Case Manager | Update due date of responses regarding third party subpoenas | 09 | 0.50 | \$450 | \$225.00 |
| 10/01/2025 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket; Review email and Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 10/01/2025 | Juan Lossada | Senior Staff Attorney | Run searches for additional potential custodians in Exhibit B (the Form 483 responses and attachments) and the FDA correspondence. Run cross checks on the individuals listed in defendants' initial disclosures and amended R&Os against iRhythm names listed in Exhibit B. Prepare report re same. | 09 | 2.50 | \$525 | \$1,312.50 |
| 10/01/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and emails re discovery, docketed documents and calendared events. Followed up on status of service. | 09 | 1.50 | \$500 | \$750.00 |
| 10/01/2025 | Thomas Sperber | Associate | Work with staff attorney on research re: potential custodians; review staff attorney work product re: potential custodians; review and revise junior associate draft of memorialization/discovery disputes letter and circulate for partner review | 08 | 3.50 | \$875 | \$3,062.50 |
| 10/02/2025 | Abygail Krita | Associate | Draft memorialization letter. | 08 | 1.75 | \$650 | \$1,137.50 |
| 10/02/2025 | Abygail Krita | Associate | Correspond with third parties regarding subpoenas. | 09 | 1.50 | \$650 | \$975.00 |
| 10/02/2025 | Jessica Lacon | Docket Clerk | Corresponding with servers; updating team re subpoenas; accounting; Review email and Docket and Diary relevant dates and deadlines; Review order, Reconcile and Docket | 09 | 1.00 | \$450 | \$450.00 |
| 10/02/2025 | Thomas Sperber | Associate | Work with junior associate on incorporating K. Sinderson comments to and finalizing M&C memorialization letter | 08 | 2.00 | \$875 | \$1,750.00 |
| 10/03/2025 | Abygail Krita | Associate | Draft motion for class certification. | 07 | 2.25 | \$650 | \$1,462.50 |
| 10/03/2025 | Cindy Bomzer-Stein | Case Manager | Research responses to defendants' request to admit | 09 | 3.75 | \$450 | \$1,687.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------|--|-----------|-------|---------|------------|
| 10/03/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoena chart | 09 | 0.50 | \$450 | \$225.00 |
| 10/03/2025 | Cindy Bomzer-Stein | Case Manager | Organize third party subpoenas and responses on iManage | 09 | 0.50 | \$450 | \$225.00 |
| 10/06/2025 | Abygail Krita | Associate | Track subpoena correspondence and discuss next steps with Managing Clerk's Office. | 09 | 0.75 | \$650 | \$487.50 |
| 10/06/2025 | Abygail Krita | Associate | Draft class cert motion. | 07 | 0.75 | \$650 | \$487.50 |
| 10/06/2025 | Cindy Bomzer-Stein | Case Manager | Research responses to defendants' request to admit | 09 | 1.50 | \$450 | \$675.00 |
| 10/06/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoena | 09 | 0.25 | \$450 | \$112.50 |
| 10/06/2025 | Jessica Lacon | Docket Clerk | Corresponding with team re subpoena service; handling subpoena service; | 09 | 0.50 | \$450 | \$225.00 |
| 10/06/2025 | Thomas Sperber | Associate | Draft and send email following up on discovery dispute responses | 08 | 0.25 | \$875 | \$218.75 |
| 10/07/2025 | Abygail Krita | Associate | Draft class cert motion. | 07 | 5.50 | \$650 | \$3,575.00 |
| 10/07/2025 | Abygail Krita | Associate | Prepare for and attend meet and confer. | 08 | 1.00 | \$650 | \$650.00 |
| 10/07/2025 | Cindy Bomzer-Stein | Case Manager | Research related DOJ related case for filings | 14 | 0.25 | \$450 | \$112.50 |
| 10/07/2025 | Jessica Lacon | Docket Clerk | Corresponding with vendor and team re subpoena service; | 09 | 0.25 | \$450 | \$112.50 |
| 10/07/2025 | Katherine Sinderson | Partner | Discovery correspondence and meet and confer | 08 | 1.75 | \$1,600 | \$2,800.00 |
| 10/07/2025 | Thomas Sperber | Associate | Draft and send substantive email response to letter received last night re: Defendants' positions on their discovery in advance of in-person M&C; lead in-person M&C | 08 | 5.50 | \$875 | \$4,812.50 |
| 10/08/2025 | Abygail Krita | Associate | Draft class cert motion. | 07 | 3.50 | \$650 | \$2,275.00 |
| 10/08/2025 | Abygail Krita | Associate | Draft discovery dispute correspondence. | 08 | 3.25 | \$650 | \$2,112.50 |
| 10/08/2025 | Katherine Sinderson | Partner | Discovery correspondence | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 10/08/2025 | Thomas Sperber | Associate | Draft portions of and outline of memorialization letter re: discovery M&C setting up discovery disputes; revise and incorporate K. Sinderson edits to memorialization letter | 08 | 2.00 | \$875 | \$1,750.00 |
| 10/08/2025 | Thomas Sperber | Associate | Review and circulate edits and comments to draft market efficiency report | 11 | 1.50 | \$875 | \$1,312.50 |
| 10/08/2025 | Thomas Sperber | Associate | Review and revise draft class certification opening brief | 07 | 3.50 | \$875 | \$3,062.50 |
| 10/09/2025 | Abygail Krita | Associate | Draft class cert motion. | 07 | 5.00 | \$650 | \$3,250.00 |
| 10/09/2025 | Abygail Krita | Associate | Prepare for MJOP hearing. | 06 | 1.25 | \$650 | \$812.50 |
| 10/09/2025 | Cindy Bomzer-Stein | Case Manager | Organize binder for K. Sinderson regarding motion for judgment on the pleading | 06 | 0.25 | \$450 | \$112.50 |
| 10/09/2025 | Jessica Lacon | Docket Clerk | Corresponding with vendor re subpoena service; | 09 | 0.25 | \$450 | \$112.50 |
| 10/09/2025 | Katherine Sinderson | Partner | Discovery correspondence | 08 | 1.50 | \$1,600 | \$2,400.00 |
| 10/09/2025 | Katherine Sinderson | Partner | Call with expert | 11 | 0.50 | \$1,600 | \$800.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 10/09/2025 | Thomas Sperber | Associate | Incorporate K. Sinderson comments to M&C memorialization and discovery dispute letter, finalize and send to Defendants | 08 | 2.50 | \$875 | \$2,187.50 |
| 10/09/2025 | Thomas Sperber | Associate | Review first draft of class cert motion and work with junior associate on follow-ups | 07 | 2.50 | \$875 | \$2,187.50 |
| 10/09/2025 | Thomas Sperber | Associate | Review client documents for production | 09 | 2.00 | \$875 | \$1,750.00 |
| 10/09/2025 | Thomas Sperber | Associate | Review and coordinate with junior associate on key cases for printing to prep K. Sinderson for MJOP hearing | 06 | 1.00 | \$875 | \$875.00 |
| 10/10/2025 | Abygail Krita | Associate | Draft class cert motion | 07 | 5.00 | \$650 | \$3,250.00 |
| 10/10/2025 | Abygail Krita | Associate | Manage third party subpoenas. | 09 | 2.00 | \$650 | \$1,300.00 |
| 10/10/2025 | Katherine Sinderson | Partner | Discovery correspondence | 08 | 1.50 | \$1,600 | \$2,400.00 |
| 10/10/2025 | Thomas Sperber | Associate | Caselow research on attorney-client privilege and attorney work product doctrine in context of FDA regulatory actions and third-party consultants; draft and send email to defendants re: extending deadline to amend; review and circulate thoughts to team re: defendants' responses re: discovery disputes, amended initial disclosures, and search term protocol. | 08 | 4.00 | \$875 | \$3,500.00 |
| 10/10/2025 | Thomas Sperber | Associate | Arrange for staff attorneys to be added to the team in advance of incoming production from Defendants | 09 | 0.75 | \$875 | \$656.25 |
| 10/10/2025 | Thomas Sperber | Associate | Review and revise latest draft of motion for class certification | 07 | 2.50 | \$875 | \$2,187.50 |
| 10/13/2025 | Abygail Krita | Associate | Draft discovery dispute letter. | 08 | 2.25 | \$650 | \$1,462.50 |
| 10/13/2025 | Jessica Lacon | Docket Clerk | Corresponding with vendors re subpoena service and updating team; | 09 | 0.25 | \$450 | \$112.50 |
| 10/13/2025 | Juan Lossada | Senior Staff Attorney | Start review of the iRhythm_001 (2025-10-10) defendant production. | 09 | 6.50 | \$525 | \$3,412.50 |
| 10/13/2025 | Katherine Sinderson | Partner | Discovery discussions re potential motion to compel | 08 | 3.50 | \$1,600 | \$5,600.00 |
| 10/13/2025 | Roberto Santamarina | Litigation Support | Download, organize, edit, and load of Def. prod iRhythm_001 into relativity. Perform load quality control, update index, run scripts, and release. | 09 | 1.25 | \$525 | \$656.25 |
| 10/13/2025 | Thomas Sperber | Associate | Conduct targeted searches and review documents from first defense production | 09 | 4.25 | \$875 | \$3,718.75 |
| 10/13/2025 | Thomas Sperber | Associate | Conduct targeted searches and review documents from first defense production; draft and revise letter re: discovery disputes | 08 | 1.25 | \$875 | \$1,093.75 |
| 10/14/2025 | Abygail Krita | Associate | Draft class certification motion and client declaration. | 07 | 2.75 | \$650 | \$1,787.50 |
| 10/14/2025 | Abygail Krita | Associate | Respond to third party subpoenas. | 09 | 1.00 | \$650 | \$650.00 |
| 10/14/2025 | Cindy Bomzer-Stein | Case Manager | Create shell declarations regarding class certification motion | 07 | 1.00 | \$450 | \$450.00 |
| 10/14/2025 | Jessica Lacon | Docket Clerk | Corresponding with server and updating team | 09 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 10/14/2025 | Juan Lossada | Senior Staff Attorney | Continue review of the iRhythm_001 defendant production. | 09 | 1.25 | \$525 | \$656.25 |
| 10/14/2025 | Katherine Sinderson | Partner | Discovery correspondence | 08 | 0.75 | \$1,600 | \$1,200.00 |
| 10/14/2025 | Thomas Sperber | Associate | Review defs amended initial disclosures and analyze changes from original initial disclosures, and discuss with team; draft new sections of joint discovery letter concerning search terms dispute and improper amendments to initial disclosures; draft joint discovery dispute statement re: DOJ production | 01 | 7.00 | \$875 | \$6,125.00 |
| 10/15/2025 | Abygail Krita | Associate | Draft class certification motion and accompanying client declarations | 07 | 1.75 | \$650 | \$1,137.50 |
| 10/15/2025 | Abygail Krita | Associate | Draft email correspondence and joint letter to court on discovery disputes. | 08 | 1.50 | \$650 | \$975.00 |
| 10/15/2025 | Cindy Bomzer-Stein | Case Manager | Organize binder for printing for K. Sinderson regarding motion for judgment on the pleading | 06 | 1.00 | \$450 | \$450.00 |
| 10/15/2025 | Juan Lossada | Senior Staff Attorney | Continue review of the iRhythm_001 defendant production. | 09 | 6.50 | \$525 | \$3,412.50 |
| 10/15/2025 | Katherine Sinderson | Partner | Discovery correspondence | 08 | 1.50 | \$1,600 | \$2,400.00 |
| 10/15/2025 | Katherine Sinderson | Partner | MJOP hearing prep | 06 | 0.75 | \$1,600 | \$1,200.00 |
| 10/15/2025 | Thomas Sperber | Associate | Complete and circulate to team with thoughts draft of DOJ production joint discovery dispute statement; review, analyze, and circulate thoughts on Defendants' response to discovery dispute letter; draft email to defendants re: position on use of knowledge of doj production in crafting search protocol | 08 | 3.00 | \$875 | \$2,625.00 |
| 10/15/2025 | Thomas Sperber | Associate | Review former employee production to defendants; weekly team meeting; | 09 | 2.00 | \$875 | \$1,750.00 |
| 10/16/2025 | Abygail Krita | Associate | Manage discovery and third party subpoenas | 09 | 1.25 | \$650 | \$812.50 |
| 10/16/2025 | Abygail Krita | Associate | Draft class cert motion. | 07 | 2.00 | \$650 | \$1,300.00 |
| 10/16/2025 | Abygail Krita | Associate | Draft opposition outline. | 06 | 3.50 | \$650 | \$2,275.00 |
| 10/16/2025 | Juan Lossada | Senior Staff Attorney | Continue review of the iRhythm_001 defendant production. | 09 | 5.25 | \$525 | \$2,756.25 |
| 10/16/2025 | Katherine Sinderson | Partner | Discovery Correspondence | 08 | 1.25 | \$1,600 | \$2,000.00 |
| 10/16/2025 | Katherine Sinderson | Partner | MJOP hearing prep | 06 | 2.00 | \$1,600 | \$3,200.00 |
| 10/16/2025 | Thomas Sperber | Associate | Draft discovery dispute correspondence; draft joint discovery dispute statement re: DOJ production | 08 | 3.00 | \$875 | \$2,625.00 |
| 10/16/2025 | Thomas Sperber | Associate | Review revised expert damages report. | 11 | 0.75 | \$875 | \$656.25 |
| 10/16/2025 | Thomas Sperber | Associate | Work on ancillary class certification papers | 07 | 1.50 | \$875 | \$1,312.50 |
| 10/17/2025 | Abygail Krita | Associate | Draft motion for class certification. | 07 | 0.75 | \$650 | \$487.50 |
| 10/17/2025 | Juan Lossada | Senior Staff Attorney | Continue review of the iRhythm_001 defendant production. | 09 | 5.50 | \$525 | \$2,887.50 |
| 10/17/2025 | Katherine Sinderson | Partner | Discovery Correspondence | 08 | 1.50 | \$1,600 | \$2,400.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 10/17/2025 | Thomas Sperber | Associate | Complete and circulate updated joint discovery letter re: DOJ production documents; review and analyze search term hit reports sent by defendants, draft and send follow-up email; draft and send correspondence re: narrowed request re: customer complaint documents | 08 | 5.50 | \$875 | \$4,812.50 |
| 10/19/2025 | Juan Lossada | Senior Staff Attorney | Create proposed draft discovery review manual. | 09 | 1.00 | \$525 | \$525.00 |
| 10/20/2025 | Abygail Krita | Associate | Meet and confer with opposing counsel; draft memorialization letter. | 08 | 3.50 | \$650 | \$2,275.00 |
| 10/20/2025 | Juan Lossada | Senior Staff Attorney | Continue review of the iRhythm_001 defendant production; provide new staff attorneys with case background documents for review. | 09 | 4.75 | \$525 | \$2,493.75 |
| 10/20/2025 | Katherine Sinderson | Partner | Meet and confer and prep and follow up | 08 | 2.25 | \$1,600 | \$3,600.00 |
| 10/20/2025 | Thomas Sperber | Associate | Prepare for, team meeting in advance of, and lead M&C with defendants on search terms and outstanding discovery disputes; edit search terms proposal re: discussion during M&C; revise draft of memorialization letter re: M&C; draft cover email including correspondence re: amendment deadline | 08 | 6.00 | \$875 | \$5,250.00 |
| 10/21/2025 | Juan Lossada | Senior Staff Attorney | Continue review of iRhythm_001 defendant production; revise document review manual's timeline and issue tags; prepare coding panel and make additional requested revisions; respond to staff attorney questions. | 09 | 4.75 | \$525 | \$2,493.75 |
| 10/21/2025 | Julio Velazquez | Litigation Support | Confer with Thomas Sperber re: incoming 3rd party production data for former iRhythm employee; facilitated secure transfer of production data via secure link; extracted and evaluated the data; manipulated cross-reference files to append metadata, documents, and searchable text for new production data; appended new production documents, metadata, and extracted text into the existing workspace; performed workspace updates and quality control to ensure accuracy of the new production data; updated the BLBG Production Log; released and notified the team that 3rd party production documents for former employee are now available for review | 09 | 0.75 | \$475 | \$356.25 |
| 10/21/2025 | Katherine Sinderson | Partner | Follow up re discovery and prep | 08 | 1.50 | \$1,600 | \$2,400.00 |
| 10/21/2025 | Thomas Sperber | Associate | Draft updated case management statement updating on resolution of discovery disputes; research re: potential undisclosed SEC investigation | 08 | 2.00 | \$875 | \$1,750.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|------------|
| 10/21/2025 | Thomas Sperber | Associate | Research on RFAs, including reviewing RFA R&Os submitted in other cases and caselaw research on appropriate uses of RFAs and requests that implicate work product protection; review and revise document review protocol manual and tagging panel | 09 | 3.00 | \$875 | \$2,625.00 |
| 10/21/2025 | Thomas Sperber | Associate | Draft attorney and client declarations ISO class certification | 07 | 1.00 | \$875 | \$875.00 |
| 10/21/2025 | Yihong Huang | Staff Attorney | Case background material reading | 09 | 4.50 | \$475 | \$2,137.50 |
| 10/22/2025 | Abygail Krita | Associate | Draft joint stipulation and joint case management statement | 13 | 1.00 | \$650 | \$650.00 |
| 10/22/2025 | Abygail Krita | Associate | Research and summarize privilege protections in connection with third party subpoenas; weekly meeting with case team; manage third party subpoenas. | 09 | 4.75 | \$650 | \$3,087.50 |
| 10/22/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoena | 09 | 0.25 | \$450 | \$112.50 |
| 10/22/2025 | Cindy Bomzer-Stein | Case Manager | Review and finalize joint case management statement | 13 | 0.50 | \$450 | \$225.00 |
| 10/22/2025 | Cindy Bomzer-Stein | Case Manager | Draft joint stipulation regarding extending deadline for to move to amend the complaint | 13 | 1.00 | \$450 | \$450.00 |
| 10/22/2025 | Daniel Ackeret | Staff Attorney | Further reviewed second amended complaint FDA 483 reports and responses and document review manual. | 09 | 8.25 | \$450 | \$3,712.50 |
| 10/22/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond with case manager regarding pending filings; Electronic filing of joint case management statement | 13 | 1.00 | \$475 | \$475.00 |
| 10/22/2025 | Juan Lossada | Senior Staff Attorney | Continue review of iRhythm_001 defendant production; provide staff attorneys with additional review material include review manual; review defendant's RFAs, locate referenced pdfs and combine into one searchable pdf. | 09 | 6.75 | \$525 | \$3,543.75 |
| 10/22/2025 | Julio Velazquez | Litigation Support | Confer with Juan Lossada re: isolating production documents for Bates range LP_IRHYTHM_0000001 - LP_IRHYTHM_0000189; searched for designated documents and saved results; provided Juan Lossada source path to all "LP_IRHYTHM" production documents and provided search to specific document range LP_IRHYTHM_0000001 - LP_IRHYTHM_0000189 as requested | 09 | 0.50 | \$475 | \$237.50 |
| 10/22/2025 | Katherine Sinderson | Partner | Case Management Statement | 13 | 1.50 | \$1,600 | \$2,400.00 |
| 10/22/2025 | Thomas Sperber | Associate | Revise, incorporate K. Sinderson comments to, and send to defendants updated CMS informing the court of no discovery disputes | 08 | 1.50 | \$875 | \$1,312.50 |
| 10/22/2025 | Thomas Sperber | Associate | Draft and send to defendants stipulation to extend deadline to move to amend pleadings | 13 | 1.00 | \$875 | \$875.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|--|-----------|-------|-------|------------|
| 10/22/2025 | Thomas Sperber | Associate | Revise motion for class certification per K. Sinderson comments | 07 | 1.50 | \$875 | \$1,312.50 |
| 10/22/2025 | Thomas Sperber | Associate | Weekly team meeting | 09 | 1.00 | \$875 | \$875.00 |
| 10/22/2025 | Yihong Huang | Staff Attorney | Review case background materials and protocol | 09 | 8.00 | \$475 | \$3,800.00 |
| 10/23/2025 | Abygail Krita | Associate | Draft joint stipulation for motion to amend pleadings. | 13 | 0.75 | \$650 | \$487.50 |
| 10/23/2025 | Abygail Krita | Associate | Manage third party subpoenas; research and summarize case law on privilege for third party subpoenas. | 09 | 4.00 | \$650 | \$2,600.00 |
| 10/23/2025 | Cindy Bomzer-Stein | Case Manager | Draft responses to defendants' first set of requests for admission | 09 | 2.50 | \$450 | \$1,125.00 |
| 10/23/2025 | Cindy Bomzer-Stein | Case Manager | Send amended third party subpoena to service agency regarding Fellman Device Group | 09 | 0.50 | \$450 | \$225.00 |
| 10/23/2025 | Daniel Ackeret | Staff Attorney | Reviewed case materials including iRhythm's responses to FDA issues RFPs and hot docs | 09 | 3.25 | \$450 | \$1,462.50 |
| 10/23/2025 | Daniel Ackeret | Staff Attorney | Reviewed case materials including motion to dismiss DOJ correspondence FDA documents | 09 | 5.25 | \$450 | \$2,362.50 |
| 10/23/2025 | Juan Lossada | Senior Staff Attorney | Continue review of iRhythm_001 defendant production; prepare and request addition of new tags; search for redlined documents and apply 'native needed' tags. | 09 | 3.50 | \$525 | \$1,837.50 |
| 10/23/2025 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: new choices; created multiple choices within "Document Condition" metadata field; notified same that new choices are available for review; conferred with Thomas Sperber regarding incoming Third party production data for investment manager; facilitated secure transfer of the production volume via secure link; extracted and evaluated the data; manipulated cross-reference files to append metadata, documents, and searchable text into the existing workspace; appended production to the workspace and performed necessary updates; conducted quality control to ensure production accuracy; updated BLBG production logs and indexes accordingly; released the production and notified the team that production is now available for review | 09 | 1.75 | \$475 | \$831.25 |
| 10/23/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and statement, docketed document and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 10/23/2025 | Thomas Sperber | Associate | Work on class cert motion papers | 07 | 2.00 | \$875 | \$1,750.00 |
| 10/23/2025 | Thomas Sperber | Associate | Work with staff attorney and junior associate to modify coding panel and review protocol for documents missing metadata or hyperlinks; draft and discuss with K. Sinderson sample response to RFAs | 09 | 5.00 | \$875 | \$4,375.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 10/23/2025 | Thomas Sperber | Associate | Discuss with team edits to draft stipulation to extend deadline to move to amend | 13 | 0.50 | \$875 | \$437.50 |
| 10/23/2025 | Yihong Huang | Staff Attorney | Review case background material and protocol | 09 | 7.75 | \$475 | \$3,681.25 |
| 10/24/2025 | Abygail Krita | Associate | Draft declarations and motion for class certification. | 07 | 2.00 | \$650 | \$1,300.00 |
| 10/24/2025 | Abygail Krita | Associate | Manage third party subpoenas; summarize privilege research for team | 09 | 2.50 | \$650 | \$1,625.00 |
| 10/24/2025 | Abygail Krita | Associate | Correspond with defense counsel re discovery. | 08 | 0.75 | \$650 | \$487.50 |
| 10/24/2025 | Cindy Bomzer-Stein | Case Manager | Finalize joint stipulation regarding deadline to move to amend the pleadings | 13 | 0.50 | \$450 | \$225.00 |
| 10/24/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoena chart | 09 | 0.75 | \$450 | \$337.50 |
| 10/24/2025 | Daniel Ackeret | Staff Attorney | Reviewed FDA documents and responses | 09 | 4.25 | \$450 | \$1,912.50 |
| 10/24/2025 | Daniel Ackeret | Staff Attorney | Reviewed iRhythm press releases and SEC filings | 09 | 2.50 | \$450 | \$1,125.00 |
| 10/24/2025 | Juan Lossada | Senior Staff Attorney | Continue review iRhythm_001 defendant production documents; respond to staff attorney questions. | 09 | 3.50 | \$525 | \$1,837.50 |
| 10/24/2025 | Thomas Sperber | Associate | Draft and circulate RFA R&Os | 09 | 4.75 | \$875 | \$4,156.25 |
| 10/24/2025 | Thomas Sperber | Associate | Revise, finalize, and coordinate filing of stipulation to extend deadline to move to amend complaint | 13 | 0.50 | \$875 | \$437.50 |
| 10/24/2025 | Yihong Huang | Staff Attorney | Review case background materials in SharePoint | 09 | 8.00 | \$475 | \$3,800.00 |
| 10/27/2025 | Abygail Krita | Associate | Managed third party subpoenas and discovery process | 09 | 1.50 | \$650 | \$975.00 |
| 10/27/2025 | Abygail Krita | Associate | Draft motion for class certification. | 07 | 3.75 | \$650 | \$2,437.50 |
| 10/27/2025 | Cindy Bomzer-Stein | Case Manager | Draft amended third party subpoena and notice | 09 | 0.50 | \$450 | \$225.00 |
| 10/27/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve trading records for J. Lossada | 09 | 0.25 | \$450 | \$112.50 |
| 10/27/2025 | Cindy Bomzer-Stein | Case Manager | Research entities for third party subpoenas | 09 | 0.50 | \$450 | \$225.00 |
| 10/27/2025 | Cindy Bomzer-Stein | Case Manager | Proofread responses to defendants' request for admission | 09 | 1.00 | \$450 | \$450.00 |
| 10/27/2025 | Cindy Bomzer-Stein | Case Manager | Research and draft third party subpoena regarding Food and Drug Administration | 09 | 0.50 | \$450 | \$225.00 |
| 10/27/2025 | Cindy Bomzer-Stein | Case Manager | Download produced documents from Relativity | 09 | 0.75 | \$450 | \$337.50 |
| 10/27/2025 | Daniel Ackeret | Staff Attorney | Reviewed FDA reports SEC filings and Press Releases | 09 | 7.00 | \$450 | \$3,150.00 |
| 10/27/2025 | Juan Lossada | Senior Staff Attorney | Update document review manual and provide example of documents needing new tags; continue review of iRhythm_001 defendant production; meeting with new staff attorneys; review client trading records and tally up shares purchased during the class period. | 09 | 5.00 | \$525 | \$2,625.00 |
| 10/27/2025 | Katherine Sinderson | Partner | Review documents identified as hot; discuss discovery strategy and document review priorities with team | 09 | 2.50 | \$1,600 | \$4,000.00 |
| 10/27/2025 | Katherine Sinderson | Partner | Review of class cert papers | 07 | 2.00 | \$1,600 | \$3,200.00 |
| 10/27/2025 | Mahiri Buffong | Managing Clerk | Updated case profile and calendared events. | 13 | 1.50 | \$500 | \$750.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 10/27/2025 | Thomas Sperber | Associate | Revise and incorporate K. Sinderson comments to RFA R&Os; work with team on additional third party subpoena recipients and service issues; wdiscuss open discovery items with team and work on closing out and drafting responses; work with junior associate on discovery and third party emails | 09 | 5.00 | \$875 | \$4,375.00 |
| 10/27/2025 | Thomas Sperber | Associate | Work on class cert filing papers | 07 | 0.50 | \$875 | \$437.50 |
| 10/27/2025 | Yihong Huang | Staff Attorney | Review case background material in Sharepoint Repository | 09 | 8.00 | \$475 | \$3,800.00 |
| 10/28/2025 | Abygail Krita | Associate | Prepare for meet and confer regarding third party subpoenas; draft memorialization letter of meet and confer. | 08 | 2.25 | \$650 | \$1,462.50 |
| 10/28/2025 | Abygail Krita | Associate | Correspond with third parties on subpoenas. | 09 | 1.50 | \$650 | \$975.00 |
| 10/28/2025 | Abygail Krita | Associate | Finalize class cert motion. | 07 | 1.50 | \$650 | \$975.00 |
| 10/28/2025 | Daniel Ackeret | Staff Attorney | Drafted acronym list and reviewed case materials FDA responses. | 09 | 8.00 | \$450 | \$3,600.00 |
| 10/28/2025 | Jessica Lacon | Docket Clerk | Updating team re subpoena service; review email and Docket and Diary relevant dates and deadlines | 09 | 0.75 | \$450 | \$337.50 |
| 10/28/2025 | Juan Lossada | Senior Staff Attorney | Continue review of iRhythm_001 production; run searches through database for references to MBCA consultants and any of their employees. | 09 | 3.50 | \$525 | \$1,837.50 |
| 10/28/2025 | Katherine Sinderson | Partner | Hot doc review | 09 | 1.00 | \$1,600 | \$1,600.00 |
| 10/28/2025 | Katherine Sinderson | Partner | Discovery strategy/call with defendants/call with third parties | 08 | 2.00 | \$1,600 | \$3,200.00 |
| 10/28/2025 | Katherine Sinderson | Partner | Review of class cert papers | 07 | 1.50 | \$1,600 | \$2,400.00 |
| 10/28/2025 | Katherine Sinderson | Partner | Email to client re class cert papers | 16 | 0.50 | \$1,600 | \$800.00 |
| 10/28/2025 | Thomas Sperber | Associate | Complete drafting and circulate Touhy letter re: subpoena to FDA; draft email to defendants re: third party document privilege review; prepare for and lead M&C with third party subpoena recipient; work with staff attorney re: identifying documents referencing or including third parties; draft and circulate email to third party re: LP document collection; revise email to defendants and work with staff attorney team re: documents missing metadata and hyperlinks | 09 | 6.00 | \$875 | \$5,250.00 |
| 10/28/2025 | Thomas Sperber | Associate | Prepare for and lead M&C with defendants re: class certification motion, case deadlines, and government shutdown | 07 | 1.00 | \$875 | \$875.00 |
| 10/28/2025 | Yihong Huang | Staff Attorney | Review case background material | 09 | 8.00 | \$475 | \$3,800.00 |
| 10/29/2025 | Abygail Krita | Associate | Correspond with third parties on subpoenas; attend iRhythm weekly meeting. | 09 | 2.50 | \$650 | \$1,625.00 |
| 10/29/2025 | Abygail Krita | Associate | Draft memorialization letter; review correspondence with Quinn Emanuel | 08 | 2.00 | \$650 | \$1,300.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|------------|
| 10/29/2025 | Cindy Bomzer-Stein | Case Manager | Attend filing plan meeting regarding class certification motion | 07 | 0.25 | \$450 | \$112.50 |
| 10/29/2025 | Cindy Bomzer-Stein | Case Manager | Revise and finalize responses to defendants' requests for admission | 09 | 0.75 | \$450 | \$337.50 |
| 10/29/2025 | Cindy Bomzer-Stein | Case Manager | Cite check brief regarding class certification motion | 07 | 5.75 | \$450 | \$2,587.50 |
| 10/29/2025 | Daniel Ackeret | Staff Attorney | Reviewed case materials and worked on the acronym list | 09 | 8.00 | \$450 | \$3,600.00 |
| 10/29/2025 | Janielle Lattimore | Assistant Managing Clerk | Correspond/discussions with case manager and docket clerk re: Bloomberg research and team notifications | 15 | 0.50 | \$475 | \$237.50 |
| 10/29/2025 | Jessica Lacon | Docket Clerk | Corresponding with servers re service of subpoenas | 09 | 0.50 | \$450 | \$225.00 |
| 10/29/2025 | Juan Lossada | Senior Staff Attorney | Continue review of iRhythm_001 production; review documents in 'linked material' search created by Litigation Support. | 09 | 2.00 | \$525 | \$1,050.00 |
| 10/29/2025 | Katherine Sinderson | Partner | Discovery correspondence and requests/team meeting/meet and confer | 08 | 2.25 | \$1,600 | \$3,600.00 |
| 10/29/2025 | Mahiri Buffong | Managing Clerk | Attended filing plan meeting for class cert. motion. | 07 | 0.50 | \$500 | \$250.00 |
| 10/29/2025 | Mahiri Buffong | Managing Clerk | Reviewed discovery documents and arranged service. | 09 | 0.75 | \$500 | \$375.00 |
| 10/29/2025 | Paul Charlotin | Litigation Support | Downloaded, QC, & uploaded provided Third party production | 09 | 1.25 | \$475 | \$593.75 |
| 10/29/2025 | Thomas Sperber | Associate | Meeting with managing clerks office to discuss class certification motion filing plan | 07 | 0.50 | \$875 | \$437.50 |
| 10/29/2025 | Thomas Sperber | Associate | Lead and prepare for meet and confer with third party re: subpoena response; weekly team meeting; review and revise memorialization letter for third party meet and confer on 10.28; revise FDA subpoena letter and draft document requests; review and revise document requests to third-party subpoena; review, revise, finalize, and serve REA R&Os | 09 | 6.00 | \$875 | \$5,250.00 |
| 10/29/2025 | Yihong Huang | Staff Attorney | Review case background material | 09 | 8.00 | \$475 | \$3,800.00 |
| 10/30/2025 | Abygail Krita | Associate | Manage third party subpoenas | 09 | 0.75 | \$650 | \$487.50 |
| 10/30/2025 | Abygail Krita | Associate | Draft memorialization letter of M&C | 08 | 5.00 | \$650 | \$3,250.00 |
| 10/30/2025 | Abygail Krita | Associate | Manage third party subpoenas; draft memorialization letter of M&C; finalize class certification materials. | 07 | 1.00 | \$650 | \$650.00 |
| 10/30/2025 | Cindy Bomzer-Stein | Case Manager | Cite check declaration regarding class certification motion | 07 | 0.50 | \$450 | \$225.00 |
| 10/30/2025 | Cindy Bomzer-Stein | Case Manager | Draft proposed order regarding class certification motion | 07 | 0.50 | \$450 | \$225.00 |
| 10/30/2025 | Cindy Bomzer-Stein | Case Manager | Revise and finalize subpoena to Food and Drug Administration | 09 | 0.50 | \$450 | \$225.00 |
| 10/30/2025 | Cindy Bomzer-Stein | Case Manager | Research certification of meet and confer regarding class certification motion | 07 | 0.50 | \$450 | \$225.00 |
| 10/30/2025 | Cindy Bomzer-Stein | Case Manager | Draft certification of meet and confer regarding class certification motion | 07 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------|---|-----------|-------|---------|------------|
| 10/30/2025 | Cindy Bomzer-Stein | Case Manager | Cite check brief regarding class certification motion | 07 | 2.00 | \$450 | \$900.00 |
| 10/30/2025 | Daniel Ackeret | Staff Attorney | Reviewed case materials and added to the acronym list | 09 | 8.00 | \$450 | \$3,600.00 |
| 10/30/2025 | Katherine Sinderson | Partner | Meet and confer and discussion re extension request | 13 | 2.50 | \$1,600 | \$4,000.00 |
| 10/30/2025 | Katherine Sinderson | Partner | Editing class cert motion | 07 | 2.50 | \$1,600 | \$4,000.00 |
| 10/30/2025 | Thomas Sperber | Associate | Draft, revise, and send response to Defendants' email re: case deadlines and government shutdown | 13 | 1.00 | \$875 | \$875.00 |
| 10/30/2025 | Thomas Sperber | Associate | Revise, finalize, and serve subpoena to FDA | 09 | 2.50 | \$875 | \$2,187.50 |
| 10/30/2025 | Thomas Sperber | Associate | Email re filing class certification motion; work on finalizing class certification motion papers | 07 | 3.00 | \$875 | \$2,625.00 |
| 10/30/2025 | Yihong Huang | Staff Attorney | Review case background material and compiling acronyms | 09 | 8.00 | \$475 | \$3,800.00 |
| 10/31/2025 | Abygail Krita | Associate | Draft motion for class certification | 07 | 3.00 | \$650 | \$1,950.00 |
| 10/31/2025 | Abygail Krita | Associate | Draft correspondence to opposing counsel re discovery. | 09 | 0.75 | \$650 | \$487.50 |
| 10/31/2025 | Cindy Bomzer-Stein | Case Manager | Upload affidavits of service to iManage regarding third party subpoenas | 09 | 0.25 | \$450 | \$112.50 |
| 10/31/2025 | Cindy Bomzer-Stein | Case Manager | Draft sealing motion regarding class certification motion | 07 | 0.75 | \$450 | \$337.50 |
| 10/31/2025 | Daniel Ackeret | Staff Attorney | Read background case materials transcripts and analyst reports | 09 | 8.00 | \$450 | \$3,600.00 |
| 10/31/2025 | Julio Velazquez | Litigation Support | Conferred with Thomas Sperber re: 3rd party iRhythm A Salim Production data; facilitated secure transfer of the production volume via secure link; extracted and evaluated the data; manipulated cross-reference files to append metadata, documents, and searchable text into the existing workspace; appended iRhythm A Salim Production to the workspace and performed necessary updates; conducted quality control to ensure production accuracy; updated BLBG production logs and indexes accordingly; released the production and notified Thomas Sperber that iRhythm A Salim Production is available for review; conferred with Thomas Sperber regarding incoming Defendants production data for volume iRhythm_002; facilitated secure transfer of the production volume via secure link; extracted and evaluated the data; manipulated cross-reference files to append metadata, documents, and searchable text into the existing workspace; appended iRhythm_002 to the workspace and performed necessary updates; conducted quality control to ensure production accuracy; updated BLBG production logs and indexes accordingly | 09 | 1.25 | \$475 | \$593.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 10/31/2025 | Thomas Sperber | Associate | Finalize and serve subpoena to third party; coordinate with team to download defendant document production | 09 | 1.50 | \$875 | \$1,312.50 |
| 10/31/2025 | Thomas Sperber | Associate | Work to finalize class certification papers for filing on Monday | 07 | 4.00 | \$875 | \$3,500.00 |
| 10/31/2025 | Yihong Huang | Staff Attorney | Review case background material and compiling acronyms | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/01/2025 | Juan Lossada | Senior Staff Attorney | Set up review batches for new defendant production and create new teams chat group for review team. Email staff attorneys with instructions for start of review on Monday (11/3). | 09 | 0.50 | \$525 | \$262.50 |
| 11/01/2025 | Katherine Sinderson | Partner | Editing class cert motion | 07 | 1.75 | \$1,600 | \$2,800.00 |
| 11/02/2025 | Katherine Sinderson | Partner | Editing class cert motion | 07 | 2.75 | \$1,600 | \$4,400.00 |
| 11/02/2025 | Thomas Sperber | Associate | Review and edit near-final Matt Cain report ISO class certification | 11 | 1.75 | \$875 | \$1,531.25 |
| 11/02/2025 | Thomas Sperber | Associate | Review new document production from defendants | 09 | 1.50 | \$875 | \$1,312.50 |
| 11/03/2025 | Abygail Krita | Associate | Draft and file motion for class certification. | 07 | 3.00 | \$650 | \$1,950.00 |
| 11/03/2025 | Abygail Krita | Associate | Correspond regarding third party subpoenas. | 09 | 1.00 | \$650 | \$650.00 |
| 11/03/2025 | Cindy Bomzer-Stein | Case Manager | Revise and finalize class certification motion papers | 07 | 4.50 | \$450 | \$2,025.00 |
| 11/03/2025 | Daniel Ackeret | Staff Attorney | Started reviewing documents in Relativity | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/03/2025 | Juan Lossada | Senior Staff Attorney | Monitor review chat group and respond to staff attorney questions; factual research re identification of Blackford custodial document referencing third party | 09 | 0.75 | \$525 | \$393.75 |
| 11/03/2025 | Katherine Sinderson | Partner | Editing class cert motion | 07 | 3.00 | \$1,600 | \$4,800.00 |
| 11/03/2025 | Mahiri Buffong | Managing Clerk | Reviewed and updated filing plan. Confirmed COS requirements for team. Reviewed documents for filing compliance, filed documents. | 07 | 2.75 | \$500 | \$1,375.00 |
| 11/03/2025 | Thomas Sperber | Associate | Work with team to finalize and file motion for class certification and all associated papers, exhibits etc | 07 | 3.50 | \$875 | \$3,062.50 |
| 11/03/2025 | Thomas Sperber | Associate | Review third party subpoena R&Os; draft and (attempt to) send email to client contact at deloitte re: document collection; work with lit support to figure out why emails to client's document collection team are not going through. | 09 | 5.25 | \$875 | \$4,593.75 |
| 11/03/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/04/2025 | Abygail Krita | Associate | Review and correspond on third party subpoenas; correspond with reviewers on discovery; draft correspondence to defendants. | 09 | 3.25 | \$650 | \$2,112.50 |
| 11/04/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited in class certification motion | 07 | 0.75 | \$450 | \$337.50 |
| 11/04/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents in Relativity | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/04/2025 | Juan Lossada | Senior Staff Attorney | Respond to review related questions from staff attorneys. | 09 | 0.75 | \$525 | \$393.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 11/04/2025 | Thomas Sperber | Associate | Draft outline of response to defendants re: request to extend case schedule | 13 | 1.00 | \$875 | \$875.00 |
| 11/04/2025 | Thomas Sperber | Associate | Coordinate with team to produce backup material to expert report ISO class certification motion | 11 | 1.00 | \$875 | \$875.00 |
| 11/04/2025 | Thomas Sperber | Associate | Review RFA samples and begin formulating RFA plan and outline | 09 | 1.00 | \$875 | \$875.00 |
| 11/04/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/05/2025 | Abygail Krita | Associate | Meet with reviewers and internal team to discuss discovery; correspond with third parties on subpoenas; draft list of cases involving lead plaintiff for defendants review; review defendants administrative motion. | 09 | 3.50 | \$650 | \$2,275.00 |
| 11/05/2025 | Cindy Bomzer-Stein | Case Manager | Research hearing calendar regarding Judge Corley | 13 | 0.25 | \$450 | \$112.50 |
| 11/05/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents for potential amendment; hot docs call | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/05/2025 | Juan Lossada | Senior Staff Attorney | Attend prelude meeting to initial hot docs meeting; perform QC of reviewed docs for missing "high-risk patients" tags; set up and start populating Client Depo Prep folder in SharePoint with documents from client and third party productions. | 09 | 2.00 | \$525 | \$1,050.00 |
| 11/05/2025 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: reviewed by and reviewed on metadata fields; set up BLBG_Reviewed By and BLBG_Reviewed On fields in the workspace to auto-populate moving forward; backfilled these fields for documents where BLBG_Relevance was previously coded; created a search for Juan Lossada containing all documents coded to date | 09 | 0.50 | \$475 | \$237.50 |
| 11/05/2025 | Katherine Sinderson | Partner | Correspondence, review of submission re schedule | 08 | 2.75 | \$1,600 | \$4,400.00 |
| 11/05/2025 | Katherine Sinderson | Partner | Team meeting, hot docs | 09 | 2.75 | \$1,600 | \$4,400.00 |
| 11/05/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket, notice and order, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 11/05/2025 | Thomas Sperber | Associate | Weekly team meeting; meeting with document review team; draft email to review team re: prioritization of document review; discuss potential topics for RFAs with team and send proposal to K. Sinderson. | 09 | 5.00 | \$875 | \$4,375.00 |
| 11/05/2025 | Thomas Sperber | Associate | Revise junior associate draft email response re: request to extend case schedule | 13 | 0.50 | \$875 | \$437.50 |
| 11/05/2025 | Yihong Huang | Staff Attorney | Attend weekly case update meeting and review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/06/2025 | Abygail Krita | Associate | Research for administrative motion | 13 | 1.00 | \$650 | \$650.00 |
| 11/06/2025 | Abygail Krita | Associate | Correspond with reviewers on discovery matters. | 09 | 0.50 | \$650 | \$325.00 |
| 11/06/2025 | Cindy Bomzer-Stein | Case Manager | Create shells regarding opposition to motion for administrative relief | 13 | 1.00 | \$450 | \$450.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 11/06/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents for possible amendment | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/06/2025 | Juan Lossada | Senior Staff Attorney | Monitor questions from staff attorneys on document review chat group; run searches through 3rd party productions for documents with relevant CUSIP number. | 09 | 0.50 | \$525 | \$262.50 |
| 11/06/2025 | Thomas Sperber | Associate | Draft opposition to Defendants' motion to extend discovery deadlines due to government shutdown; review local rules and discuss with team the proper local rule under which motion should have been brought, and how to oppose; update and send to Defendants email re: agreement to produce documents from client's custodial files and regarding cases client served or sought to serve as lead plaintiff | 08 | 6.00 | \$875 | \$5,250.00 |
| 11/06/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/07/2025 | Abygail Krita | Associate | Draft response to administrative motion | 13 | 1.00 | \$650 | \$650.00 |
| 11/07/2025 | Abygail Krita | Associate | Correspond with experts | 11 | 0.50 | \$650 | \$325.00 |
| 11/07/2025 | Abygail Krita | Associate | Correspond with third parties; draft offensive RFAs. | 09 | 1.50 | \$650 | \$975.00 |
| 11/07/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents in batch 2 and 3 | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/07/2025 | Juan Lossada | Senior Staff Attorney | Complete review of defendants iRhythm production 001; start QC review of iRhythm production 001 for insertion of new issue tags. | 09 | 5.00 | \$525 | \$2,625.00 |
| 11/07/2025 | Katherine Sinderson | Partner | Review of court order on MJOP and internal correspondence re same | 14 | 2.50 | \$1,600 | \$4,000.00 |
| 11/07/2025 | Katherine Sinderson | Partner | Correspondence with client re Court decision on MJOP. | 16 | 0.25 | \$1,600 | \$400.00 |
| 11/07/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and orders, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 11/07/2025 | Thomas Sperber | Associate | Continue drafting, incorporate K. Sinderson comments to, and circulate for final review draft opposition to defendants' motion to extend case deadlines due to government shutdown | 13 | 1.50 | \$875 | \$1,312.50 |
| 11/07/2025 | Thomas Sperber | Associate | Review order denying MJOP | 14 | 1.25 | \$875 | \$1,093.75 |
| 11/07/2025 | Thomas Sperber | Associate | Work with team to coordinate receipt of client document collection | 09 | 3.00 | \$875 | \$2,625.00 |
| 11/07/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/09/2025 | Abygail Krita | Associate | Draft C. Rankin depo prep memo. | 10 | 0.75 | \$650 | \$487.50 |
| 11/10/2025 | Abygail Krita | Associate | Draft offensive RFAs; review client documents for production. | 09 | 2.50 | \$650 | \$1,625.00 |
| 11/10/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents for hot documents before July 25 2022 | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/10/2025 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 11/10/2025 | Juan Lossada | Senior Staff Attorney | Factual and document research re FDA RRA and CAPA-0016; Look through client document production 2025-11-10; prepare plaintiff-side coding panel. | 09 | 2.00 | \$525 | \$1,050.00 |
| 11/10/2025 | Katherine Sinderson | Partner | Research re order and coordinating depositions | 10 | 1.50 | \$1,600 | \$2,400.00 |
| 11/10/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed document and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 11/10/2025 | Roberto Santamarina | Litigation Support | Download, organize, and process of client data from OFPRS (Chase Rankin) into reviewable format. Quality check processed data for accuracy, load to relativity, update index, run scripts, and release. | 09 | 1.50 | \$525 | \$787.50 |
| 11/10/2025 | Thomas Sperber | Associate | Review and revise initial draft of RFAs; emails to defendants re: plaintiff's document collections | 09 | 2.50 | \$875 | \$2,187.50 |
| 11/10/2025 | Thomas Sperber | Associate | Emails to defendants re: deposition scheduling; review materials concerning deposition of Oklahoma Firefighters by Quinn Emmanuel for client dep prep | 10 | 1.75 | \$875 | \$1,531.25 |
| 11/10/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/11/2025 | Abygail Krita | Associate | Draft offensive RFAs; prepare for meet and confer and correspond and manage third party subpoenas. | 09 | 4.75 | \$650 | \$3,087.50 |
| 11/11/2025 | Cindy Bomzer-Stein | Case Manager | Create shells regarding motion for leave to amend | 13 | 2.25 | \$450 | \$1,012.50 |
| 11/11/2025 | Daniel Ackeret | Staff Attorney | Review documents in Batch 5 | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/11/2025 | Juan Lossada | Senior Staff Attorney | Start review of OFPRS production documents with CUSIP hits. | 09 | 4.00 | \$525 | \$2,100.00 |
| 11/11/2025 | Roberto Santamarina | Litigation Support | Creation of coding fields and layout for Plaintiff document review. | 09 | 0.75 | \$525 | \$393.75 |
| 11/11/2025 | Thomas Sperber | Associate | Complete and circulate draft of RFAs; summarize findings from review of documents prior to class period | 09 | 5.50 | \$875 | \$4,812.50 |
| 11/11/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/12/2025 | Abygail Krita | Associate | Prepare for meet and confer and lead meet and confer with third party subpoena counsel; draft correspondence with third parties. | 09 | 4.25 | \$650 | \$2,762.50 |
| 11/12/2025 | Cindy Bomzer-Stein | Case Manager | Draft shell regarding second set of interrogatories to Defendants | 09 | 0.50 | \$450 | \$225.00 |
| 11/12/2025 | Cindy Bomzer-Stein | Case Manager | Revise shells regarding motion for leave to amend | 13 | 0.75 | \$450 | \$337.50 |
| 11/12/2025 | Cindy Bomzer-Stein | Case Manager | Update third party subpoena chart | 09 | 0.50 | \$450 | \$225.00 |
| 11/12/2025 | Cindy Bomzer-Stein | Case Manager | Upload responses regarding third party subpoenas | 09 | 0.25 | \$450 | \$112.50 |
| 11/12/2025 | Cindy Bomzer-Stein | Case Manager | Schedule deposition preparation times for client witnesses | 10 | 0.25 | \$450 | \$112.50 |
| 11/12/2025 | Cindy Bomzer-Stein | Case Manager | Schedule deposition preparation times for expert witnesses | 11 | 0.25 | \$450 | \$112.50 |
| 11/12/2025 | Daniel Ackeret | Staff Attorney | Reviewed for documents dating before 7/25/2022 | 09 | 8.00 | \$450 | \$3,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 11/12/2025 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 1.75 | \$450 | \$787.50 |
| 11/12/2025 | Juan Lossada | Senior Staff Attorney | Complete review of CUSIP hits in client's production documents; start review of IRTC and iRhythm hits in client's production documents; search defendants' MJOP and exhibits for references to acute medical intervention. | 09 | 6.25 | \$525 | \$3,281.25 |
| 11/12/2025 | Julio Velazquez | Litigation Support | Created review batches from Defendant production volume iRhythm_003 for team | 09 | 0.25 | \$475 | \$118.75 |
| 11/12/2025 | Katherine Sinderson | Partner | Team meeting and review of discovery requests | 09 | 1.50 | \$1,600 | \$2,400.00 |
| 11/12/2025 | Roberto Santamarina | Litigation Support | Download, organize, edit, and load of Def prod iRhythm_003 into relativity. Perform load quality control, update index, run scripts, and release. | 09 | 2.00 | \$525 | \$1,050.00 |
| 11/12/2025 | Roberto Santamarina | Litigation Support | Download, organize, and process of Documents relied upon by Defendants data into reviewable format. Quality check for accuracy and load to relativity. Update index, run scripts, and release. | 09 | 1.00 | \$525 | \$525.00 |
| 11/12/2025 | Thomas Sperber | Associate | Weekly team meeting; draft and circulate for review draft second set of interrogatories; incorporate K. Sinderson edits and comments to RFAs; revise email re: third party document review by defense counsel; review and work with junior associate on outline for leading M&C with third party; attend and assist with third party M&C | 09 | 5.00 | \$875 | \$4,375.00 |
| 11/12/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/13/2025 | Abygail Krita | Associate | Draft C. Rankin deposition prep memo. | 10 | 3.50 | \$650 | \$2,275.00 |
| 11/13/2025 | Cindy Bomzer-Stein | Case Manager | Review and revise first set of requests for admission | 09 | 0.50 | \$450 | \$225.00 |
| 11/13/2025 | Cindy Bomzer-Stein | Case Manager | Revise second set of interrogatories | 09 | 0.25 | \$450 | \$112.50 |
| 11/13/2025 | Cindy Bomzer-Stein | Case Manager | Calendar responses to discovery requests to defendants | 09 | 0.25 | \$450 | \$112.50 |
| 11/13/2025 | Cindy Bomzer-Stein | Case Manager | Create exhibit regarding discovery correspondence to defendants | 09 | 0.50 | \$450 | \$225.00 |
| 11/13/2025 | Daniel Ackeret | Staff Attorney | Reviewed document dating before the class period. | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/13/2025 | Juan Lossada | Senior Staff Attorney | Complete review of relevant client documents; start preparing client depo prep index and folders in SharePoint; gather exemplar documents from all defendant productions that contain dead hyperlinks and URLs, and documents with redlines and comment boxes that are missing natives, and prepare discovery dispute chart of same | 09 | 9.25 | \$525 | \$4,856.25 |
| 11/13/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket, email, docketed document and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 11/13/2025 | Thomas Sperber | Associate | Call with M. Arrow to discuss Matt Cain depo defense and prep | 11 | 0.75 | \$875 | \$656.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|--|-----------|-------|-------|------------|
| 11/13/2025 | Thomas Sperber | Associate | Revise, finalize, and serve second set of interrogatories and first set of requests for admission; work with review team to ensure hot docs are being correctly coded and included in presentations; draft and send to defendants email re: document production deficiencies | 09 | 3.75 | \$875 | \$3,281.25 |
| 11/13/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/14/2025 | Abygail Krita | Associate | Draft C. Rankin depo prep memo. | 10 | 2.75 | \$650 | \$1,787.50 |
| 11/14/2025 | Cindy Bomzer-Stein | Case Manager | Review court orders regarding deadlines of related DOJ appeal | 13 | 0.75 | \$450 | \$337.50 |
| 11/14/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents dating before the start of the class period | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/14/2025 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 11/14/2025 | Juan Lossada | Senior Staff Attorney | Continue review of documents | 09 | 2.00 | \$525 | \$1,050.00 |
| 11/14/2025 | Juan Lossada | Senior Staff Attorney | Preparation of Chase Rankin depo prep folders and index. | 10 | 2.50 | \$525 | \$1,312.50 |
| 11/14/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket and email. docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 11/14/2025 | Thomas Sperber | Associate | Work with team on preparing depo prep materials for client and reviewing client documents | 10 | 3.50 | \$875 | \$3,062.50 |
| 11/14/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/15/2025 | Juan Lossada | Senior Staff Attorney | Continue review of documents and preparation of Chase Rankin depo prep folders and index. | 10 | 3.75 | \$525 | \$1,968.75 |
| 11/16/2025 | Abygail Krita | Associate | Draft client depo prep memo. | 10 | 1.50 | \$650 | \$975.00 |
| 11/16/2025 | Juan Lossada | Senior Staff Attorney | Continue review of documents and preparation of Chase Rankin depo prep folders and index. | 10 | 2.25 | \$525 | \$1,181.25 |
| 11/17/2025 | Abygail Krita | Associate | Draft client depo prep memo | 10 | 1.00 | \$650 | \$650.00 |
| 11/17/2025 | Abygail Krita | Associate | Attend meet and confer with third party | 09 | 2.00 | \$650 | \$1,300.00 |
| 11/17/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs for potential amendment | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/17/2025 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 11/17/2025 | Juan Lossada | Senior Staff Attorney | Continue review of documents and preparation of Chase Rankin depo prep folders and index. | 10 | 10.00 | \$525 | \$5,250.00 |
| 11/17/2025 | Thomas Sperber | Associate | Prepare for and lead M&C with third party | 09 | 2.25 | \$875 | \$1,968.75 |
| 11/17/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/18/2025 | Abygail Krita | Associate | Prepare for and attend meet and confer. | 08 | 2.00 | \$650 | \$1,300.00 |
| 11/18/2025 | Abygail Krita | Associate | Draft client depo prep memo. | 10 | 2.75 | \$650 | \$1,787.50 |
| 11/18/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve documents regarding client deposition preparation | 10 | 2.50 | \$450 | \$1,125.00 |
| 11/18/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs for potential amendment | 09 | 8.00 | \$450 | \$3,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|--|-----------|-------|-------|------------|
| 11/18/2025 | Juan Lossada | Senior Staff Attorney | Continue review of documents and preparation of Chase Rankin depo prep index and folders. | 10 | 8.00 | \$525 | \$4,200.00 |
| 11/18/2025 | Juan Lossada | Senior Staff Attorney | Run designated search terms (13 total) against documents designated for production to defendants. | 09 | 2.00 | \$525 | \$1,050.00 |
| 11/18/2025 | Thomas Sperber | Associate | Work with team on upcoming client production; review junior associate's outline for upcoming M&C with third party subpoena recipient; join and assist with M&C; draft and send email response to Defendants re: third party document privilege review | 09 | 3.75 | \$875 | \$3,281.25 |
| 11/18/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/19/2025 | Abygail Krita | Associate | Draft C. Rankin depo prep memo and gather materials. | 10 | 3.25 | \$650 | \$2,112.50 |
| 11/19/2025 | Abygail Krita | Associate | Coordinate discovery process. | 08 | 0.50 | \$650 | \$325.00 |
| 11/19/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve documents regarding client deposition preparation | 10 | 0.50 | \$450 | \$225.00 |
| 11/19/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs for potential amendment | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/19/2025 | Juan Lossada | Senior Staff Attorney | Meeting with Thomas Sperber and Abby Krita regarding client document production; review documents for client deposition; instruct staff attorneys on presentation of hot documents for hot docs meeting on Thursday (11/20). | 09 | 8.50 | \$525 | \$4,462.50 |
| 11/19/2025 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: review batches; isolated production iRythm_004 documents and created review batches as requested by Juan Lossada; notified Juan Lossada that iRythm_004 production documents have been batched and available for review; conferred with Juan Lossada re: all "LP" produced documents to date; provided Juan Lossada with production path and isolated search to all "LP" produced documents to date; conferred with Abygail Krita re: LP Retainer document for workspace; facilitated transfer of same via to secure server; prepared & appended newly received document into existing workspace for processing; converted electronic document into image form; created searchable text to perform keyword searches; performed quality control to ensure document accuracy; updated search indexes and notified Abygail Krita LP Retainer has been added to the workspace and available for review | 09 | 1.50 | \$475 | \$712.50 |
| 11/19/2025 | Matthew Mahady | Case Manager | Assist attorney with locating Oklahoma Firefighters' retainer agreement and monitoring agreement | 09 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|---|-----------|-------|-------|------------|
| 11/19/2025 | Thomas Sperber | Associate | Work with team on client document production, including reviewing documents for potential privilege, discussing substantive documents with team, making calls as to relevance, summarizing contents of upcoming production to K. Sinderson and discussing strategy, etc. | 09 | 6.75 | \$875 | \$5,906.25 |
| 11/19/2025 | Thomas Sperber | Associate | Review materials for and make recommendation to team on potential expert witness | 11 | 1.75 | \$875 | \$1,531.25 |
| 11/19/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/20/2025 | Abygail Krita | Associate | Draft and finalize C. Rankin depo prep memo. | 10 | 2.00 | \$650 | \$1,300.00 |
| 11/20/2025 | Abygail Krita | Associate | Coordinate document production to defendants. | 09 | 1.75 | \$650 | \$1,137.50 |
| 11/20/2025 | Cindy Bomzer-Stein | Case Manager | Update documents and create index regarding client deposition preparation | 10 | 2.00 | \$450 | \$900.00 |
| 11/20/2025 | Daniel Ackeret | Staff Attorney | Hot docs call; reviewed for hot docs prior to the class period | 09 | 7.75 | \$450 | \$3,487.50 |
| 11/20/2025 | Juan Lossada | Senior Staff Attorney | Attend hot docs meeting; apply confidential and highly confidential tagging to client documents that are designated for production; conduct review of stamped documents for any misapplications of confidentiality; create pdfs of production documents and upload to SP folder for review by associates and partner. | 09 | 8.50 | \$525 | \$4,462.50 |
| 11/20/2025 | Thomas Sperber | Associate | Review, revise, and provide comments to draft deposition prep memo for client | 10 | 3.00 | \$875 | \$2,625.00 |
| 11/20/2025 | Thomas Sperber | Associate | Work with team and K. Sinderson on client document production | 09 | 2.00 | \$875 | \$1,750.00 |
| 11/20/2025 | Yihong Huang | Staff Attorney | Attended hot document meeting and review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/21/2025 | Abygail Krita | Associate | Draft C. Rankin depo prep memo and finalize accompanying materials | 10 | 2.25 | \$650 | \$1,462.50 |
| 11/21/2025 | Abygail Krita | Associate | Coordinate document production to defendants. | 09 | 1.00 | \$650 | \$650.00 |
| 11/21/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs prior to the class period | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/21/2025 | Juan Lossada | Senior Staff Attorney | Request and review slipsheets for corrupted files in client's production 003; telephone call with Thomas Sperber and Abby Krita regarding client production items for completion; review and remove documents from client production that do not relate to iRhythm as a business and the allegations in the Complaint | 09 | 2.25 | \$525 | \$1,181.25 |
| 11/21/2025 | Thomas Sperber | Associate | Review and work with team on upcoming client document production, including call with team to discuss strategy and level of responsiveness of review | 09 | 3.50 | \$875 | \$3,062.50 |
| 11/21/2025 | Thomas Sperber | Associate | Call with potential expert witness | 11 | 0.75 | \$875 | \$656.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|-------|------------|
| 11/21/2025 | Thomas Sperber | Associate | Work with team on client dep prep materials | 10 | 2.00 | \$875 | \$1,750.00 |
| 11/21/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/23/2025 | Abygail Krita | Associate | Finalize C. Rankin depo prep memo. | 10 | 1.00 | \$650 | \$650.00 |
| 11/23/2025 | Juan Lossada | Senior Staff Attorney | Review all production documents for spreadsheets or reports listing transaction dates and confirm that any with transaction dates match the purchase and sales dates on the State Street transaction report. | 09 | 4.25 | \$525 | \$2,231.25 |
| 11/24/2025 | Abygail Krita | Associate | Finalize C. Rankin depo prep memo and accompanying materials. | 10 | 1.75 | \$650 | \$1,137.50 |
| 11/24/2025 | Abygail Krita | Associate | Finalize production to defendants. | 09 | 1.75 | \$650 | \$1,137.50 |
| 11/24/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents for potential amendment | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/24/2025 | Juan Lossada | Senior Staff Attorney | Final review of final production for documents with iRhythm substantial discussions and Chase Rankin substantial discussions. | 09 | 1.00 | \$525 | \$525.00 |
| 11/24/2025 | Roberto Santamarina | Litigation Support | Re-Production of documents (LP_IRHYTHM_003). | 09 | 1.25 | \$525 | \$656.25 |
| 11/24/2025 | Thomas Sperber | Associate | Work with team to review and produce client documents; draft and send email to Defendants re: document discovery deficiencies | 09 | 5.50 | \$875 | \$4,812.50 |
| 11/24/2025 | Thomas Sperber | Associate | Work with team to get depo prep materials printed and shipped to client | 10 | 0.50 | \$875 | \$437.50 |
| 11/24/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/25/2025 | Abygail Krita | Associate | Finalize C. Rankin depo prep memo materials. | 10 | 0.75 | \$650 | \$487.50 |
| 11/25/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents for potential amendment | 09 | 8.00 | \$450 | \$3,600.00 |
| 11/25/2025 | Juan Lossada | Senior Staff Attorney | Assist with location of Quarterly Quality Council presentations containing 'post market surveillance' slide; assist with location of 'Delayed MDNs' spreadsheets and research recipients of these spreadsheets; request and circulate hot docs from staff attorneys. | 09 | 3.00 | \$525 | \$1,575.00 |
| 11/25/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of sections 5 and 6 of Chase Rankin's deposition index and pdf and file related documents in SharePoint folders. | 10 | 1.50 | \$525 | \$787.50 |
| 11/25/2025 | Thomas Sperber | Associate | Work on outline for Matt Cain dep prep | 11 | 1.00 | \$875 | \$875.00 |
| 11/25/2025 | Thomas Sperber | Associate | Review and work with staff attorneys re: hottest docs for potential amendment; summarize and circulate findings to K. Sinderson re: transmission limit | 09 | 1.50 | \$875 | \$1,312.50 |
| 11/25/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/26/2025 | Abygail Krita | Associate | Manage discovery process | 08 | 1.00 | \$650 | \$650.00 |
| 11/26/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents for potential amendment | 09 | 8.00 | \$450 | \$3,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|-----------------|-----------------------|--|-----------|-------|-------|------------|
| 11/26/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of Chase Rankin depo prep kit (pdfing, highlighting, and subbing in production documents); respond to staff attorney substantive questions and document formatting questions). | 10 | 4.25 | \$525 | \$2,231.25 |
| 11/26/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 11/27/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of Chase Rankin depo prep kit (pdfing, highlighting, and subbing in production documents). | 10 | 1.50 | \$525 | \$787.50 |
| 12/01/2025 | Abygail Krita | Associate | Review hot docs with team. | 09 | 1.00 | \$650 | \$650.00 |
| 12/01/2025 | Daniel Ackeret | Staff Attorney | Hot docs call and reviewed for hot docs for potential amendment | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/01/2025 | Juan Lossada | Senior Staff Attorney | Collect every hot or near hot document for potential amendment and provide a short write up on each for potential use in decision to amend complaint; attend hot doc meeting; gather all former employee communication documents for production to defendants. | 09 | 8.00 | \$525 | \$4,200.00 |
| 12/01/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of Chase Rankin depo prep kit (pdfing, highlighting and subbing out non production documents) | 10 | 3.00 | \$525 | \$1,575.00 |
| 12/01/2025 | Thomas Sperber | Associate | Review and work on summary of docs that we could use to amend complaint | 14 | 1.25 | \$875 | \$1,093.75 |
| 12/01/2025 | Thomas Sperber | Associate | Hot docs meeting; discuss with K. Sinderson use of Relativity Active Learning and other methods to streamline and enhance doc review | 09 | 1.00 | \$875 | \$875.00 |
| 12/01/2025 | Thomas Sperber | Associate | Work on prep outline for Matt Cain deposition | 11 | 0.75 | \$875 | \$656.25 |
| 12/01/2025 | Yihong Huang | Staff Attorney | Attended hot document meeting with the team and code and review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/02/2025 | Abygail Krita | Associate | Coordinate production of former employee comms; manage discovery process. | 09 | 2.25 | \$650 | \$1,462.50 |
| 12/02/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs for potential amendment and relevance | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/02/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of Chase Rankin depo prep kit. | 10 | 1.25 | \$525 | \$656.25 |
| 12/02/2025 | Juan Lossada | Senior Staff Attorney | Attend meeting with Lit Support, Katie Sinderson, Tom Sperber and Abby Krita; additional research re pre-CP Quentin Blackford custodial documents. | 09 | 2.00 | \$525 | \$1,050.00 |
| 12/02/2025 | Julio Velazquez | Litigation Support | Teams call with team re: Relativity Active Learning review; isolated seed set based off Relevance field; created RAL project; conducted QC to ensure ranking output; created targeted searches for attorney review; provided team direct search links to RAL results | 09 | 1.75 | \$475 | \$831.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|-------|------------|
| 12/02/2025 | Thomas Sperber | Associate | Collect and summarize for K. Sinderson hottest documents supporting scienter prior to the class period | 09 | 3.25 | \$875 | \$2,843.75 |
| 12/02/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/03/2025 | Abygail Krita | Associate | Attend weekly meeting. | 09 | 2.00 | \$650 | \$1,300.00 |
| 12/03/2025 | Abygail Krita | Associate | Draft correspondence to defendants. | 08 | 2.00 | \$650 | \$1,300.00 |
| 12/03/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents from the Relativity Active Learning curated list | 09 | 7.25 | \$450 | \$3,262.50 |
| 12/03/2025 | Jessica Lacon | Docket Clerk | Review email; docket and diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 12/03/2025 | Juan Lossada | Senior Staff Attorney | Continue preparation of Chase Rankin depo prep kit | 10 | 2.00 | \$525 | \$1,050.00 |
| 12/03/2025 | Juan Lossada | Senior Staff Attorney | Respond to staff attorney questions re documents; request date filtering of Relativity Active Learning batches. | 09 | 2.00 | \$525 | \$1,050.00 |
| 12/03/2025 | Mahiri Buffong | Managing Clerk | Reviewed docket, discovery notices and email, docketed document and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 12/03/2025 | Roberto Santamarina | Litigation Support | Download, organize, edit, and load of Defendant production iRhythm_005 into Relativity. Perform load quality control, update index, run scripts, and release. | 09 | 2.50 | \$525 | \$1,312.50 |
| 12/03/2025 | Thomas Sperber | Associate | Complete Matt Cain prep outline and circulate to K. Sinderson | 11 | 2.75 | \$875 | \$2,406.25 |
| 12/03/2025 | Thomas Sperber | Associate | Weekly meeting; review and discuss with team Defendants' RFAs | 09 | 2.25 | \$875 | \$1,968.75 |
| 12/03/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/04/2025 | Abygail Krita | Associate | Prepare for FDA meet and confer | 09 | 1.00 | \$650 | \$650.00 |
| 12/04/2025 | Abygail Krita | Associate | Prepare expert for deposition | 11 | 5.00 | \$650 | \$3,250.00 |
| 12/04/2025 | Abygail Krita | Associate | Manage discovery process. | 08 | 1.00 | \$650 | \$650.00 |
| 12/04/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve and send to expert M. Cain motion for judgment on the pleadings and motion to dismiss | 11 | 1.00 | \$450 | \$450.00 |
| 12/04/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents from the Relativity Active Learning curated list for hot docs prior to the class period | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/04/2025 | Juan Lossada | Senior Staff Attorney | Run searches through new defendant production iRhythm_005 for relevant pre-CP documents. | 09 | 2.00 | \$525 | \$1,050.00 |
| 12/04/2025 | Thomas Sperber | Associate | Prep session with Matt Cain for deposition | 11 | 3.00 | \$875 | \$2,625.00 |
| 12/04/2025 | Thomas Sperber | Associate | Prepare for and lead M&C with FDA re: third party subpoena | 09 | 1.00 | \$875 | \$875.00 |
| 12/04/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/05/2025 | Cindy Bomzer-Stein | Case Manager | Upload former employee correspondence to Relativity for production | 09 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|-------|------------|
| 12/05/2025 | Daniel Ackeret | Staff Attorney | Reviewed documents from the Relativity Active Learning curated list for hot docs prior to the class period | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/05/2025 | Juan Lossada | Senior Staff Attorney | Continue to run search through new defendant production iRhythm_005 for relevant pre-CP documents. | 09 | 4.00 | \$525 | \$2,100.00 |
| 12/05/2025 | Thomas Sperber | Associate | Review production for analyst discussion of warning letter for use in Cain prep; miscellaneous fact and case research for Cain prep | 11 | 2.50 | \$875 | \$2,187.50 |
| 12/05/2025 | Thomas Sperber | Associate | Review former employee comms for upcoming production; review, analyze, and discuss third party subpoena R&Os | 09 | 2.00 | \$875 | \$1,750.00 |
| 12/05/2025 | Yihong Huang | Staff Attorney | Review and code documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/07/2025 | Thomas Sperber | Associate | Organize discovery-related tasks for the upcoming week for myself and junior associate and send email concerning same to team | 08 | 1.00 | \$875 | \$875.00 |
| 12/07/2025 | Thomas Sperber | Associate | Matt Cain deposition prep | 11 | 1.25 | \$875 | \$1,093.75 |
| 12/08/2025 | Abygail Kritta | Associate | Prepare for deposition of Chase Rankin | 10 | 6.00 | \$650 | \$3,900.00 |
| 12/08/2025 | Abygail Kritta | Associate | Manage discovery process. | 08 | 1.00 | \$650 | \$650.00 |
| 12/08/2025 | Abygail Kritta | Associate | Coordinate third party subpoenas. | 09 | 0.75 | \$650 | \$487.50 |
| 12/08/2025 | Cindy Bomzer-Stein | Case Manager | Review former employee correspondence regarding production | 09 | 3.00 | \$450 | \$1,350.00 |
| 12/08/2025 | Daniel Ackeret | Staff Attorney | Reviewed pre-class dated documents for hot docs | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/08/2025 | Juan Lossada | Senior Staff Attorney | Complete preparation of Chase Rankin depo kit using all client production documents. All production documents are now pdf'ed and highlighted, and depo index updated. | 10 | 8.75 | \$525 | \$4,593.75 |
| 12/08/2025 | Roberto Santamarina | Litigation Support | Production of documents (LP_IRHYTHM_004). | 09 | 1.25 | \$525 | \$656.25 |
| 12/08/2025 | Thomas Sperber | Associate | Review former employee's communications to be produced to defendants and arrange for finalization of production; calls with former employee's counsel to discuss their communication productions; work with lit support and senior staff attorney on review process and use of Relativity Active Learning prioritization; draft R&Os to 30b6 depo notice | 09 | 4.25 | \$875 | \$3,718.75 |
| 12/08/2025 | Thomas Sperber | Associate | Work on Matt Cain deposition prep | 11 | 1.50 | \$875 | \$1,312.50 |
| 12/08/2025 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/09/2025 | Abygail Kritta | Associate | Prepare for Chase Rankin deposition. | 10 | 9.25 | \$650 | \$6,012.50 |
| 12/09/2025 | Cindy Bomzer-Stein | Case Manager | Review files regarding FDA FOIA requests | 09 | 0.75 | \$450 | \$337.50 |
| 12/09/2025 | Cindy Bomzer-Stein | Case Manager | Draft opposition regarding deposition notice to plaintiff | 10 | 3.00 | \$450 | \$1,350.00 |
| 12/09/2025 | Daniel Ackeret | Staff Attorney | Prepared hot docs for hot docs meeting; reviewed for pre-class hot docs | 09 | 8.00 | \$450 | \$3,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 12/09/2025 | Juan Lossada | Senior Staff Attorney | Review hot doc submissions from staff attorneys; prep my own hot doc submissions for hot doc meeting tomorrow; run additional key term searches through the iRhythm_005 defendant production; run internet searches for articles quoting deponent Chase Rankin. | 09 | 3.50 | \$525 | \$1,837.50 |
| 12/09/2025 | Katherine Sinderson | Partner | Client deposition prep | 10 | 3.50 | \$1,600 | \$5,600.00 |
| 12/09/2025 | Thomas Sperber | Associate | Work on collecting material for and outlining deposition prep for Matt Cain tomorrow | 11 | 2.00 | \$875 | \$1,750.00 |
| 12/09/2025 | Thomas Sperber | Associate | Finalize and arrange for service client document production | 09 | 0.50 | \$875 | \$437.50 |
| 12/09/2025 | Thomas Sperber | Associate | Finalize and serve 30bc deposition notice R&Os; attend part of client deposition prep session | 10 | 2.00 | \$875 | \$1,750.00 |
| 12/09/2025 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/10/2025 | Abygail Krita | Associate | Attend and assist in deposition of Chase Rankin; assist with deposition prep for Matt Cain. | 10 | 8.25 | \$650 | \$5,362.50 |
| 12/10/2025 | Cindy Bomzer-Stein | Case Manager | Draft responses to second set of requests for admission | 09 | 2.25 | \$450 | \$1,012.50 |
| 12/10/2025 | Cindy Bomzer-Stein | Case Manager | Upload responses to defendants' discovery requests to iManage | 09 | 0.25 | \$450 | \$112.50 |
| 12/10/2025 | Cindy Bomzer-Stein | Case Manager | Organize binder regarding deposition preparation for M. Cain | 11 | 1.00 | \$450 | \$450.00 |
| 12/10/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs from Relativity Active Learning batches | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/10/2025 | Katherine Sinderson | Partner | Client deposition | 10 | 6.00 | \$1,600 | \$9,600.00 |
| 12/10/2025 | Katherine Sinderson | Partner | Expert deposition prep | 11 | 1.50 | \$1,600 | \$2,400.00 |
| 12/10/2025 | Paul Charlotin | Litigation Support | Add/Modified requested Layout(s), View(s), Field (s), Highlighting &/or Tag(s)/Choices(s) per request | 09 | 0.25 | \$475 | \$118.75 |
| 12/10/2025 | Thomas Sperber | Associate | Prepare mock cross questions and other materials for deposition prep; deposition prep session with Matt Cain | 11 | 8.00 | \$875 | \$7,000.00 |
| 12/10/2025 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/11/2025 | Cindy Bomzer-Stein | Case Manager | Draft shells regarding class certification reply | 07 | 1.00 | \$450 | \$450.00 |
| 12/11/2025 | Cindy Bomzer-Stein | Case Manager | Draft responses to second set of requests for admission | 09 | 0.75 | \$450 | \$337.50 |
| 12/11/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs from Relativity Active Learning batches | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/11/2025 | Juan Lossada | Senior Staff Attorney | Review third party production for substantive documents re Zio AT or iRhythm; create Share Point folder for all client production and third party production documents that relate to third party. | 09 | 1.25 | \$525 | \$656.25 |
| 12/11/2025 | Katherine Sinderson | Partner | Expert deposition and follow up | 11 | 8.50 | \$1,600 | \$13,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------|--|-----------|-------|---------|-------------|
| 12/11/2025 | Roberto Santamarina | Litigation Support | Download, organize, edit, and load of Defendants' production iRhythm_006 into relativity. Update index, update Relativity Active Learning project, update RAL searches and batches, and release. | 09 | 2.50 | \$525 | \$1,312.50 |
| 12/11/2025 | Thomas Sperber | Associate | Defend Matt Cain deposition | 11 | 9.00 | \$875 | \$7,875.00 |
| 12/11/2025 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/12/2025 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs from Relativity Active Learning batches | 09 | 8.00 | \$450 | \$3,600.00 |
| 12/12/2025 | Juan Lossada | Senior Staff Attorney | Add relevance and issue tags to all investment manager production documents; Search investment manager and Oklahoma Firefighters production documents for portfolio investment strategies | 09 | 8.00 | \$525 | \$4,200.00 |
| 12/12/2025 | Paul Charlotin | Litigation Support | Worked with J. Lossada and D. Ackeret to correct and update highlighting terms | 09 | 0.75 | \$475 | \$356.25 |
| 12/12/2025 | Thomas Sperber | Associate | Review third party document production and discuss findings with K. Sinderson in advance of deposition; review defs' RFA R&Os and discuss with team | 09 | 4.75 | \$875 | \$4,156.25 |
| 12/12/2025 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 12/13/2025 | Thomas Sperber | Associate | Review investment manager production and send notable documents to K. Sinderson with analysis | 09 | 3.00 | \$875 | \$2,625.00 |
| 12/15/2025 | Adam Weinschel | Director of Investor Services | Reviewed lead plaintiff transactions and holdings | 10 | 1.00 | \$650 | \$650.00 |
| 12/15/2025 | Cindy Bomzer-Stein | Case Manager | Upload deposition exhibits and transcripts to Sharepoint, iManage and Relativity regarding M. Cain | 11 | 0.75 | \$450 | \$337.50 |
| 12/15/2025 | Juan Lossada | Senior Staff Attorney | Gather and review all produced trading records for prepping investment manager depo; review all investment manager texts and notes | 10 | 3.75 | \$525 | \$1,968.75 |
| 12/15/2025 | Katherine Sinderson | Partner | Investment Manager Deposition prep | 10 | 1.50 | \$1,600 | \$2,400.00 |
| 12/15/2025 | Thomas Sperber | Associate | Call with investment manager counsel; prep for IM deposition | 10 | 8.00 | \$875 | \$7,000.00 |
| 12/16/2025 | Abygail Krita | Associate | Prepare for meet and confer. | 08 | 1.75 | \$650 | \$1,137.50 |
| 12/16/2025 | Abygail Krita | Associate | Draft engagement letter for expert. | 11 | 1.00 | \$650 | \$650.00 |
| 12/16/2025 | Abygail Krita | Associate | Create list of potential deponents. | 10 | 1.75 | \$650 | \$1,137.50 |
| 12/16/2025 | Cindy Bomzer-Stein | Case Manager | Retrieve and send exhibits regarding Investment Manager deposition | 10 | 0.75 | \$450 | \$337.50 |
| 12/16/2025 | Juan Lossada | Senior Staff Attorney | Assist with location of investor presentation for use at investment manager deposition; gather and circulate hot documents for hot doc meeting on 12/17; respond to staff attorney questions. | 09 | 0.75 | \$525 | \$393.75 |
| 12/16/2025 | Juan Lossada | Senior Staff Attorney | Compile list of potential tier 1 and tier 2 defendant deponent. | 10 | 0.50 | \$525 | \$262.50 |
| 12/16/2025 | Katherine Sinderson | Partner | Investment Manager Deposition | 10 | 7.50 | \$1,600 | \$12,000.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|---|-----------|-------|-------|------------|
| 12/16/2025 | Paul Charlotin | Litigation Support | Downloaded, QC, & uploaded provided Defendant production | 09 | 1.00 | \$475 | \$475.00 |
| 12/16/2025 | Thomas Sperber | Associate | Prepare for and defend Investment Manager deposition | 10 | 9.00 | \$875 | \$7,875.00 |
| 12/17/2025 | Abygail Krita | Associate | Prepare for and lead meet and confer with third parties; review hot documents; attend hot docs call and weekly meeting. | 09 | 5.25 | \$650 | \$3,412.50 |
| 12/17/2025 | Abygail Krita | Associate | Draft engagement letter for expert. | 11 | 0.75 | \$650 | \$487.50 |
| 12/17/2025 | Juan Lossada | Senior Staff Attorney | Attend hot docs meeting. | 09 | 1.00 | \$525 | \$525.00 |
| 12/17/2025 | Juan Lossada | Senior Staff Attorney | Update potential defendant deponents chart; research tagged hot docs for additional names to add to potential defendant deponents chart. | 10 | 4.50 | \$525 | \$2,362.50 |
| 12/17/2025 | Thomas Sperber | Associate | Work with junior associate on plan and outline for M&C with third-party; attend and participate in third-party M&C; hot docs call; weekly team meeting; work with staff attorney to analyze production metrics per doc custodian. | 09 | 3.50 | \$875 | \$3,062.50 |
| 12/17/2025 | Thomas Sperber | Associate | Call with individual who reached out re: her family experience with iRhythm devices. | 01 | 0.75 | \$875 | \$656.25 |
| 12/17/2025 | Thomas Sperber | Associate | Review and revise retainer agreement with expert witness | 11 | 0.50 | \$875 | \$437.50 |
| 12/18/2025 | Abygail Krita | Associate | Draft correspondence to defendants. | 08 | 2.00 | \$650 | \$1,300.00 |
| 12/18/2025 | Cindy Bomzer-Stein | Case Manager | Upload deposition transcripts and exhibits to iManage and Sharepoint | 09 | 0.75 | \$450 | \$337.50 |
| 12/18/2025 | Juan Lossada | Senior Staff Attorney | Review all Quentin Blackford hot docs and update potential defendant deponents chart; respond to further staff attorney questions regarding internet searches. | 09 | 1.75 | \$525 | \$918.75 |
| 12/19/2025 | Abygail Krita | Associate | Draft correspondence to defendants. | 08 | 2.00 | \$650 | \$1,300.00 |
| 12/19/2025 | Juan Lossada | Senior Staff Attorney | Review hot documents for selected iRhythm officers; run search for generated transcripts (texts and chats) and set up file for review. | 09 | 6.50 | \$525 | \$3,412.50 |
| 12/19/2025 | Juan Lossada | Senior Staff Attorney | Update potential deponent chart with summaries of hot documents. | 10 | 1.50 | \$525 | \$787.50 |
| 12/19/2025 | Paul Charlotin | Litigation Support | Downloaded, QC, & uploaded provided Third party productions | 09 | 0.75 | \$475 | \$356.25 |
| 12/19/2025 | Thomas Sperber | Associate | Draft and circulate to team second set of RFA responses; work with junior associate on draft email to defense counsel re: privilege review | 09 | 3.25 | \$875 | \$2,843.75 |
| 12/22/2025 | Abygail Krita | Associate | Draft responses to RFAs and correspondence to defendants. | 09 | 6.00 | \$650 | \$3,900.00 |
| 12/22/2025 | Juan Lossada | Senior Staff Attorney | Review chat messages for production cutoff and prepare list of same. | 09 | 9.00 | \$525 | \$4,725.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|----------------|-----------------------|---|-----------|-------|-------|------------|
| 12/22/2025 | Paul Charlotin | Litigation Support | Downloaded, QC, & uploaded provided Defendant production | 09 | 2.50 | \$475 | \$1,187.50 |
| 12/22/2025 | Thomas Sperber | Associate | Revise draft email to Defendants re: privilege review; work with staff attorney to compile list of instant messaging documents with issues; review and discuss with lead staff attorney document review progress; prepare for upcoming M&C on RFA and interrogatory responses | 09 | 4.00 | \$875 | \$3,500.00 |
| 12/23/2025 | Abygail Krita | Associate | Review potentially relevant documents; attend weekly meeting. | 09 | 1.75 | \$650 | \$1,137.50 |
| 12/23/2025 | Juan Lossada | Senior Staff Attorney | Research and review documents related to internal company project as assigned by attorneys | 09 | 8.00 | \$525 | \$4,200.00 |
| 12/23/2025 | Thomas Sperber | Associate | Weekly team meeting; revise and work with junior associate on further revisions to R&O's to Defs' second set of RFAs; work with junior associate on email to defendants re: privilege review | 09 | 4.00 | \$875 | \$3,500.00 |
| 12/24/2025 | Juan Lossada | Senior Staff Attorney | Assist with count of text and data cutoff chat documents produced by defendants; continue research on internal company project | 09 | 3.00 | \$525 | \$1,575.00 |
| 12/24/2025 | Thomas Sperber | Associate | Draft email to defendants re: instant message documents missing data; draft and send email FDA re: subpoena responses | 09 | 4.00 | \$875 | \$3,500.00 |
| 12/26/2025 | Thomas Sperber | Associate | Research on implied waiver of privilege by advice of counsel/good faith defense; prepare for upcoming M&C with defendants on RFA and Rog R&Os | 09 | 4.00 | \$875 | \$3,500.00 |
| 12/29/2025 | Thomas Sperber | Associate | Prepare for M&C with defendants re: advice of counsel defense and other R&Os to pl's RFAs and interrogatories; revise and send email re: instant message documents with imaging issues. | 09 | 3.25 | \$875 | \$2,843.75 |
| 12/30/2025 | Abygail Krita | Associate | Draft correspondence to opposing counsel; meet and confer with opposing counsel; meet and confer with third party. | 09 | 2.00 | \$650 | \$1,300.00 |
| 12/30/2025 | Thomas Sperber | Associate | Final preparations for and lead M&C with defendants re: RFA and interrogatory R&Os; prepare for and lead M&C with third-party subpoena recipient; draft email on advice of counsel and good faith defense election | 09 | 4.25 | \$875 | \$3,718.75 |
| 12/31/2025 | Abygail Krita | Associate | Finalize RFA responses. | 09 | 1.50 | \$650 | \$975.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|-----------------|--------------------|--|-----------|-------|---------|------------|
| 12/31/2025 | Julio Velazquez | Litigation Support | Conferred with Thomas Sperber regarding incoming replacement documents from Defendant iRhythm; facilitated secure transfer of production data via secure link; extracted and evaluated the data; manipulated cross-reference files to append & overlay metadata, documents, and searchable text; appended new replacement production documents, metadata, and extracted text into the existing workspace for corresponding production volume; performed workspace updates and quality control to ensure accuracy of replacement production data; updated the BLBG Production Log and performed a full index build to ensure newly appended metadata is searchable; created a search for affected documents and provided a direct link to the team for review; released and notified the team that the iRhythm replacement documents for volume iRhythm_009 Overlay are now available for | 09 | 2.50 | \$475 | \$1,187.50 |
| 12/31/2025 | Thomas Sperber | Associate | Incorporate K. Sinderson edits and comments to, finalize, and send email to defendants re: good faith defense | 09 | 1.00 | \$875 | \$875.00 |
| 12/31/2025 | Thomas Sperber | Associate | Review and discuss with team designation of M. Cain depo transcript | 11 | 0.50 | \$875 | \$437.50 |
| 01/01/2026 | Thomas Sperber | Associate | Work on RFA R&Os | 09 | 2.00 | \$875 | \$1,750.00 |
| 01/02/2026 | Abygail Krita | Associate | Draft and serve RFA responses and objections. | 09 | 5.00 | \$650 | \$3,250.00 |
| 01/02/2026 | Thomas Sperber | Associate | Incorporate K. Sinderson comments and edits to RFA R&Os, finalize and serve. | 09 | 1.25 | \$875 | \$1,093.75 |
| 01/02/2026 | Thomas Sperber | Associate | Review M. Cain and Investment Manager depo transcripts for any material requiring confidential designation and email Defendants re: same | 10 | 1.25 | \$875 | \$1,093.75 |
| 01/05/2026 | Abygail Krita | Associate | Create list of potential deponents. | 10 | 1.00 | \$650 | \$650.00 |
| 01/05/2026 | Abygail Krita | Associate | Meet with team for hot docs call and weekly meeting; research on website statements. | 09 | 2.25 | \$650 | \$1,462.50 |
| 01/05/2026 | Alec Coquin | Senior Counsel | Case orientation and strategy meeting; review of motion to dismiss briefing | 14 | 2.25 | \$1,100 | \$2,475.00 |
| 01/05/2026 | Daniel Ackeret | Staff Attorney | Hot docs meeting and reviewed for hot docs | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/05/2026 | Jessica Lacon | Docket Clerk | Initiate case track Bloomberg Lexis United States of America v. iRhythm Technologies, Inc. , Docket No. 25-3736 (9th Cir. Jun 13, 2025), Court DocketInclude Bloomberg Law Links2447-001 iRhythm 3:23-cv-04332-JSC Bhargal v. Hawaiian Electric Industries, Inc. for A. Coquin: update case profile | 13 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 01/05/2026 | Juan Lossada | Senior Staff Attorney | Review defendants' overlay production for missing message texts and metadata in chat messages; attend hot docs meeting; provide hot document information regarding requested custodian; start preparation of client privilege log. | 09 | 8.25 | \$525 | \$4,331.25 |
| 01/05/2026 | Julio Velazquez | Litigation Support | Conferred with Cindy Bomzer-Stein re: new Everchron matter & Matthew Cain deposition material; facilitated transfer of same via secure link; extracted & evaluated data; created new Everchron matter & added internal user to group; renamed exhibit files to custom naming convention; appended transcript & exhibits into newly created matter; synced exhibits to transcript; manually synced designated exhibits to transcript; conducted QC to ensure document transcript & exhibits accuracy; notified Cindy Bomzer-Stein that Matthew Cain's deposition transcript & exhibits have been added to EverChron; sent direct invite to Cindy Bomzer-Stein via ticketing system to newly created Everchron matter | 09 | 0.75 | \$475 | \$356.25 |
| 01/05/2026 | Katherine Sinderson | Partner | Hot docs and management of discovery. | 09 | 1.75 | \$1,600 | \$2,800.00 |
| 01/05/2026 | Thomas Sperber | Associate | Call with review team; discuss privilege log drafting with team | 09 | 1.75 | \$875 | \$1,531.25 |
| 01/05/2026 | Thomas Sperber | Associate | Review and discuss analysis of deposition targets | 10 | 1.50 | \$875 | \$1,312.50 |
| 01/05/2026 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 01/06/2026 | Abygail Krita | Associate | Create list of potential deponents. | 10 | 1.50 | \$650 | \$975.00 |
| 01/06/2026 | Abygail Krita | Associate | Review class cert opposition and research for reply. | 07 | 1.75 | \$650 | \$1,137.50 |
| 01/06/2026 | Alec Coquin | Senior Counsel | Review and analysis of Defendants' opposition to class certification and supporting exhibits | 14 | 2.50 | \$1,100 | \$2,750.00 |
| 01/06/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited from Westlaw regarding defendants' class certification opposition memo | 07 | 0.50 | \$450 | \$225.00 |
| 01/06/2026 | Cindy Bomzer-Stein | Case Manager | Review M. Cain deposition transcript regarding errata | 11 | 5.50 | \$450 | \$2,475.00 |
| 01/06/2026 | Cindy Bomzer-Stein | Case Manager | Upload defendants' class certification opposition papers to iManage and Sharepoint | 13 | 0.50 | \$450 | \$225.00 |
| 01/06/2026 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs relating to the second 483 | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/06/2026 | Juan Lossada | Senior Staff Attorney | Continue preparation of client privilege log; and review hot documents for potential custodians as requested by attorneys | 09 | 8.50 | \$525 | \$4,462.50 |
| 01/06/2026 | Katherine Sinderson | Partner | Review class cert brief and reports, caselaw, emails with team | 07 | 1.75 | \$1,600 | \$2,800.00 |
| 01/06/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket, motion, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 01/06/2026 | Paul Charlotin | Litigation Support | Downloaded, QC, & uploaded provided Defendant overlay production | 09 | 0.75 | \$475 | \$356.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|--|-----------|-------|---------|------------|
| 01/06/2026 | Thomas Sperber | Associate | Review, analyze, and circulate thoughts on defendants' class cert opposition submission; set up calls to discuss strategy and workflows for reply submission; begin outlining reply brief. | 07 | 3.00 | \$875 | \$2,625.00 |
| 01/06/2026 | Thomas Sperber | Associate | Send materials to Matt Cain | 11 | 0.50 | \$875 | \$437.50 |
| 01/06/2026 | Thomas Sperber | Associate | Work with team on privilege log | 09 | 1.00 | \$875 | \$875.00 |
| 01/06/2026 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 01/07/2026 | Abygail Krita | Associate | Research for and draft class cert reply. | 07 | 6.25 | \$650 | \$4,062.50 |
| 01/07/2026 | Alec Coquin | Senior Counsel | Team strategy call re class certification reply and follow-up re same | 07 | 3.00 | \$1,100 | \$3,300.00 |
| 01/07/2026 | Cindy Bomzer-Stein | Case Manager | Review M. Cain deposition transcript regarding errata | 11 | 3.50 | \$450 | \$1,575.00 |
| 01/07/2026 | Daniel Ackeret | Staff Attorney | Dep kit meeting | 10 | 1.00 | \$450 | \$450.00 |
| 01/07/2026 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs relating to the 2nd 483 | 09 | 7.00 | \$450 | \$3,150.00 |
| 01/07/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket; Review order, Reconcile, Docket and Diary relevant dates and deadlines | 13 | 0.75 | \$450 | \$337.50 |
| 01/07/2026 | Juan Lossada | Senior Staff Attorney | Continue preparation of client privilege log; provide depo kit guidelines to staff attorneys; provide metrics re total document hits, hot document hits, and highly relevant document hits for Harveen Sethi. | 10 | 7.75 | \$525 | \$4,068.75 |
| 01/07/2026 | Juan Lossada | Senior Staff Attorney | Attend hot doc and case status team meeting. | 09 | 1.00 | \$525 | \$525.00 |
| 01/07/2026 | Paul Charlotin | Litigation Support | Downloaded, QC, & uploaded provided Defendant production | 09 | 1.00 | \$475 | \$475.00 |
| 01/07/2026 | Thomas Sperber | Associate | Weekly team meeting; intro call for A. Coquin; work with team on drafting privilege log | 09 | 2.25 | \$875 | \$1,968.75 |
| 01/07/2026 | Thomas Sperber | Associate | Call with Matt Cain re: class cert opp. and report | 11 | 0.75 | \$875 | \$656.25 |
| 01/07/2026 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 01/08/2026 | Abygail Krita | Associate | Draft class certification reply. | 07 | 5.00 | \$650 | \$3,250.00 |
| 01/08/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 5.50 | \$1,100 | \$6,050.00 |
| 01/08/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve class certification and summary judgment motion papers from related case | 07 | 0.75 | \$450 | \$337.50 |
| 01/08/2026 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs relating to attorney-requested topic | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/08/2026 | Juan Lossada | Senior Staff Attorney | Complete first draft of client privilege log; continue review of Defendants' production for custodian Jason Shaw. | 09 | 8.50 | \$525 | \$4,462.50 |
| 01/08/2026 | Thomas Sperber | Associate | Draft high-level outline of reply; discuss reply outline plan with team and send document proposing division of labor for each section; review documents flagged by staff attorneys and discuss follow-up research; revise email to defendants re: page limits and filing deadline | 07 | 3.50 | \$875 | \$3,062.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 01/08/2026 | Yihong Huang | Staff Attorney | Review documents in Relativity | 09 | 8.00 | \$475 | \$3,800.00 |
| 01/09/2026 | Abygail Krita | Associate | Draft class cert reply; draft correspondence to defendants re same. | 07 | 4.50 | \$650 | \$2,925.00 |
| 01/09/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 5.00 | \$1,100 | \$5,500.00 |
| 01/09/2026 | Daniel Ackeret | Staff Attorney | Reviewed for hot docs relating to attorney-requested topic | 09 | 7.50 | \$450 | \$3,375.00 |
| 01/09/2026 | Juan Lossada | Senior Staff Attorney | Continue review of defendants' production for potentially important custodians; gather background materials documents for staff attorney Randall Hirsch to review and have him added to iRhythm matters on RelativityOne and SharePoint, and to iRhythm Review chat groups. | 09 | 8.00 | \$525 | \$4,200.00 |
| 01/09/2026 | Thomas Sperber | Associate | Call with Matt Cain to discuss reply report process and questions | 11 | 0.50 | \$875 | \$437.50 |
| 01/09/2026 | Thomas Sperber | Associate | Work on class cert reply outline | 07 | 2.00 | \$875 | \$1,750.00 |
| 01/09/2026 | Thomas Sperber | Associate | Draft response to defendants re: deadline to elect to pursue affirmative defenses | 13 | 0.50 | \$875 | \$437.50 |
| 01/11/2026 | Daniel Ackeret | Staff Attorney | Searched for documents regarding attorney-requested subject | 09 | 0.50 | \$450 | \$225.00 |
| 01/11/2026 | Juan Lossada | Senior Staff Attorney | Run searches for documents for attorney-requested subjects | 09 | 1.75 | \$525 | \$918.75 |
| 01/11/2026 | Thomas Sperber | Associate | Work on class cert reply outline | 07 | 2.00 | \$875 | \$1,750.00 |
| 01/12/2026 | Abygail Krita | Associate | Draft joint stipulation. | 07 | 1.50 | \$650 | \$975.00 |
| 01/12/2026 | Alec Coquin | Senior Counsel | Analysis of analyst reports re class certification reply; correspondence with expert re same | 11 | 2.75 | \$1,100 | \$3,025.00 |
| 01/12/2026 | Cindy Bomzer-Stein | Case Manager | Draft stipulation regarding extension of page limits for class cert reply brief | 07 | 1.25 | \$450 | \$562.50 |
| 01/12/2026 | Daniel Ackeret | Staff Attorney | Searched for documents regarding attorney-requested subject | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/12/2026 | John Rizio-Hamilton | Partner | Class certification analysis | 07 | 2.75 | \$1,800 | \$4,950.00 |
| 01/12/2026 | Juan Lossada | Senior Staff Attorney | Run searches for documents for attorney-requested subjects | 09 | 8.00 | \$525 | \$4,200.00 |
| 01/12/2026 | Paul Charlotin | Litigation Support | Add requested users to the workspace; Export to PDF requested documents per J. Lossada's requests | 09 | 0.75 | \$475 | \$356.25 |
| 01/12/2026 | Randall Hirsch | Staff Attorney | Reviewed SAC MTD papers research | 09 | 8.25 | \$475 | \$3,918.75 |
| 01/12/2026 | Thomas Sperber | Associate | Revise and circulate to team draft stipulation extending reply page limit and clarifying deadline; work on class cert reply outline draft | 07 | 2.00 | \$875 | \$1,750.00 |
| 01/12/2026 | Thomas Sperber | Associate | Review documents circulated by staff attorney team and work with team on follow-up; review letter from third party re: outstanding third-party subpoena and consultant doc review | 09 | 2.00 | \$875 | \$1,750.00 |
| 01/13/2026 | Abygail Krita | Associate | Draft class cert reply brief. | 07 | 1.50 | \$650 | \$975.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 01/13/2026 | Abygail Kritta | Associate | Draft notices of deposition. | 10 | 1.00 | \$650 | \$650.00 |
| 01/13/2026 | Abygail Kritta | Associate | Draft correspondence to defendants. | 08 | 0.25 | \$650 | \$162.50 |
| 01/13/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 4.75 | \$1,100 | \$5,225.00 |
| 01/13/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve and send order denying motion to dismiss for J. Lossada | 13 | 0.25 | \$450 | \$112.50 |
| 01/13/2026 | Cindy Bomzer-Stein | Case Manager | Research and draft notice of deposition regarding defendants' experts | 11 | 1.00 | \$450 | \$450.00 |
| 01/13/2026 | Daniel Ackeret | Staff Attorney | Searched for documents regarding attorney-requested subject | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/13/2026 | Juan Lossada | Senior Staff Attorney | Run searches for documents for attorney-requested subjects | 09 | 8.25 | \$525 | \$4,331.25 |
| 01/13/2026 | Katherine Sinderson | Partner | Discussions with team re fact discovery and class cert discovery | 09 | 0.50 | \$1,600 | \$800.00 |
| 01/13/2026 | Randall Hirsch | Staff Attorney | Reviewed 483s Warning Letter and MTD; analyzed/coded documents | 09 | 8.50 | \$475 | \$4,037.50 |
| 01/13/2026 | Thomas Sperber | Associate | Circulate thoughts to team on how to handle meeting with third party re: outstanding third-party subpoena | 09 | 0.75 | \$875 | \$656.25 |
| 01/13/2026 | Thomas Sperber | Associate | Work on class cert reply outline; review draft stipulation to be filed re: reply page limits, including discussing with team Defendants' edits | 07 | 6.75 | \$875 | \$5,906.25 |
| 01/14/2026 | Abygail Kritta | Associate | Attend meet and confer with third party; attend iRhythm hot docs call and weekly meeting; draft correspondence to defendants. | 09 | 2.00 | \$650 | \$1,300.00 |
| 01/14/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply. | 07 | 3.50 | \$1,100 | \$3,850.00 |
| 01/14/2026 | Alec Coquin | Senior Counsel | M&C with non-party re subpoena response; hot docs meeting; team strategy call | 09 | 3.00 | \$1,100 | \$3,300.00 |
| 01/14/2026 | Daniel Ackeret | Staff Attorney | Hot docs call and went back to linear review of the documents | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/14/2026 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.75 | \$450 | \$337.50 |
| 01/14/2026 | Juan Lossada | Senior Staff Attorney | Complete assignments from Tom Sperber and Alec Coquin regarding specific research in defendants' production | 09 | 10.00 | \$525 | \$5,250.00 |
| 01/14/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 01/14/2026 | Randall Hirsch | Staff Attorney | Analyzed Hot doc/prep for hot doc meeting | 09 | 1.75 | \$475 | \$831.25 |
| 01/14/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 5.75 | \$475 | \$2,731.25 |
| 01/14/2026 | Randall Hirsch | Staff Attorney | Hot Doc meeting | 09 | 0.75 | \$475 | \$356.25 |
| 01/14/2026 | Thomas Sperber | Associate | Review staff attorney email summarizing findings on research project; call with third party re: outstanding subpoena; hot docs call and follow-up | 09 | 2.50 | \$875 | \$2,187.50 |
| 01/14/2026 | Thomas Sperber | Associate | Review, annotate, and circulate initial reactions and comments to first draft of M. Cain report IFSO motion for class cert. | 11 | 0.75 | \$875 | \$656.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|--|-----------|-------|---------|------------|
| 01/14/2026 | Thomas Sperber | Associate | Weekly call to discuss class cert reply drafting and strategy; discuss reply brief outline and strategy with senior counsel; finish reply brief outline, and circulate to K. Sinderson | 07 | 4.00 | \$875 | \$3,500.00 |
| 01/15/2026 | Abygail Krita | Associate | Review and finalize privilege log. | 09 | 1.00 | \$650 | \$650.00 |
| 01/15/2026 | Abygail Krita | Associate | Perform research for and draft class cert reply. | 07 | 1.50 | \$650 | \$975.00 |
| 01/15/2026 | Alec Coquin | Senior Counsel | Strategy discussion with K. Sinderson. | 14 | 0.50 | \$1,100 | \$550.00 |
| 01/15/2026 | Alec Coquin | Senior Counsel | Preparation and call with consulting expert re marketing of Zio AT re class certification reply. | 11 | 0.75 | \$1,100 | \$825.00 |
| 01/15/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 4.00 | \$1,100 | \$4,400.00 |
| 01/15/2026 | Cindy Bomzer-Stein | Case Manager | Revise and finalize stipulation to extend time to file reply | 07 | 0.75 | \$450 | \$337.50 |
| 01/15/2026 | Daniel Ackeret | Staff Attorney | Linear review of document batches | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/15/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.50 | \$450 | \$225.00 |
| 01/15/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec Coquin | 09 | 9.00 | \$525 | \$4,725.00 |
| 01/15/2026 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, filed document and calendared events. | 07 | 1.25 | \$500 | \$625.00 |
| 01/15/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents; research | 09 | 8.75 | \$475 | \$4,156.25 |
| 01/15/2026 | Thomas Sperber | Associate | Draft email to new industry expert explaining analysis needed with respect to defendants' class certification opposition expert report | 11 | 0.50 | \$875 | \$437.50 |
| 01/15/2026 | Thomas Sperber | Associate | Meeting with junior associate to discuss privilege log review; review and edit draft privilege log. | 09 | 1.50 | \$875 | \$1,312.50 |
| 01/15/2026 | Thomas Sperber | Associate | Work on class cert reply brief | 07 | 2.00 | \$875 | \$1,750.00 |
| 01/16/2026 | Abygail Krita | Associate | Review and finalize privilege log. | 09 | 0.75 | \$650 | \$487.50 |
| 01/16/2026 | Abygail Krita | Associate | Perform research for class cert reply. | 07 | 0.75 | \$650 | \$487.50 |
| 01/16/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply. | 07 | 3.75 | \$1,100 | \$4,125.00 |
| 01/16/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 3.00 | \$1,100 | \$3,300.00 |
| 01/16/2026 | Daniel Ackeret | Staff Attorney | Linear review of the batches | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/16/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec Coquin | 09 | 9.00 | \$525 | \$4,725.00 |
| 01/16/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and order, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 01/16/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents; research | 09 | 6.00 | \$475 | \$2,850.00 |
| 01/16/2026 | Thomas Sperber | Associate | Call with industry expert to discuss class cert opp. and reply; work with staff attorneys on identifying documents to assist arguments re: Defs' industry expert | 11 | 2.00 | \$875 | \$1,750.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|----------------|-----------------------|---|-----------|-------|---------|------------|
| 01/16/2026 | Thomas Sperber | Associate | Work with junior associate and staff attorney on privilege log | 09 | 1.00 | \$875 | \$875.00 |
| 01/16/2026 | Thomas Sperber | Associate | Work on draft class cert reply brief | 07 | 1.00 | \$875 | \$875.00 |
| 01/19/2026 | Abygail Krita | Associate | Draft class cert reply. | 07 | 2.25 | \$650 | \$1,462.50 |
| 01/19/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 1.75 | \$1,100 | \$1,925.00 |
| 01/19/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 0.50 | \$1,100 | \$550.00 |
| 01/19/2026 | Thomas Sperber | Associate | Work on class cert reply draft. | 07 | 1.75 | \$875 | \$1,531.25 |
| 01/19/2026 | Thomas Sperber | Associate | Review draft priv log and work with team on finalizing for partner review; work with staff attorneys on doc review | 09 | 2.00 | \$875 | \$1,750.00 |
| 01/20/2026 | Abygail Krita | Associate | Finalize privilege log. | 09 | 1.00 | \$650 | \$650.00 |
| 01/20/2026 | Abygail Krita | Associate | Draft class cert reply. | 07 | 2.25 | \$650 | \$1,462.50 |
| 01/20/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 1.00 | \$1,100 | \$1,100.00 |
| 01/20/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 0.50 | \$1,100 | \$550.00 |
| 01/20/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/20/2026 | Juan Lossada | Senior Staff Attorney | Work on plaintiff privilege log and finalize for export; continue research in defendant and third party production responsive to research question | 09 | 6.00 | \$525 | \$3,150.00 |
| 01/20/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents; research | 09 | 10.00 | \$475 | \$4,750.00 |
| 01/20/2026 | Thomas Sperber | Associate | Discovery-related tasks including review of document production and coordination with team on outstanding requests | 08 | 0.50 | \$875 | \$437.50 |
| 01/20/2026 | Thomas Sperber | Associate | Work on class cert reply draft | 07 | 2.75 | \$875 | \$2,406.25 |
| 01/21/2026 | Abygail Krita | Associate | Research potential deponents and review relevant documents; draft notice of depositions. | 10 | 6.50 | \$650 | \$4,225.00 |
| 01/21/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 5.00 | \$1,100 | \$5,500.00 |
| 01/21/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 1.00 | \$1,100 | \$1,100.00 |
| 01/21/2026 | Alec Coquin | Senior Counsel | Selected deponents | 10 | 0.75 | \$1,100 | \$825.00 |
| 01/21/2026 | Alec Coquin | Senior Counsel | M&C with Defendants re RFAs; hot docs call | 09 | 1.25 | \$1,100 | \$1,375.00 |
| 01/21/2026 | Daniel Ackeret | Staff Attorney | Searched for Defendants' documents responsive to research questions | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/21/2026 | Juan Lossada | Senior Staff Attorney | Continue collection and review of documents responsive to Alec Coquin request; attend hot docs meeting; prepare project assignments for staff attorneys; provide list of iRhythm custodians for Abby Krita. | 09 | 9.00 | \$525 | \$4,725.00 |
| 01/21/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents; research | 09 | 6.75 | \$475 | \$3,206.25 |
| 01/21/2026 | Randall Hirsch | Staff Attorney | Hot Doc meeting | 09 | 0.50 | \$475 | \$237.50 |
| 01/21/2026 | Randall Hirsch | Staff Attorney | Research projects re public disclosures | 09 | 1.50 | \$475 | \$712.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|-----------------|-----------------------|--|-----------|-------|---------|------------|
| 01/21/2026 | Thomas Sperber | Associate | Prepare for and lead M&C with defendants re: LP's R&Os to Defs' RFAs; draft email updating K. Sinderson on M&C including draft email to Defendants; work with staff attorneys on fact development questions. | 09 | 2.00 | \$875 | \$1,750.00 |
| 01/21/2026 | Thomas Sperber | Associate | Work on class cert reply draft. | 07 | 1.25 | \$875 | \$1,093.75 |
| 01/21/2026 | Thomas Sperber | Associate | Review analysis of deposition targets and discuss with team | 10 | 0.75 | \$875 | \$656.25 |
| 01/22/2026 | Abygail Krita | Associate | Draft and send notice of depositions. | 10 | 1.25 | \$650 | \$812.50 |
| 01/22/2026 | Abygail Krita | Associate | Finalize privilege log. | 09 | 1.00 | \$650 | \$650.00 |
| 01/22/2026 | Abygail Krita | Associate | Draft class cert reply. | 07 | 3.00 | \$650 | \$1,950.00 |
| 01/22/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 2.50 | \$1,100 | \$2,750.00 |
| 01/22/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 2.50 | \$1,100 | \$2,750.00 |
| 01/22/2026 | Alec Coquin | Senior Counsel | Team strategy call | 14 | 0.50 | \$1,100 | \$550.00 |
| 01/22/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 7.00 | \$450 | \$3,150.00 |
| 01/22/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec Coquin | 09 | 4.75 | \$525 | \$2,493.75 |
| 01/22/2026 | Juan Lossada | Senior Staff Attorney | Prepare potential deponent folders and populate with pdfs of custodial hot documents; identify potential deponents who are no longer employed by iRhythm. | 10 | 5.00 | \$525 | \$2,625.00 |
| 01/22/2026 | Julio Velazquez | Litigation Support | Conferred with Thomas Sperber re: incoming Third Party production data for volume Chakra_001; facilitated secure transfer of the production volume via secure link; extracted and evaluated the data; manipulated cross-reference files to append metadata, documents, and searchable text into the existing workspace; appended Chakra_001 to the workspace and performed necessary updates; conducted quality control to ensure production accuracy; identified designated parent email documents that are missing the corresponding attachment & provided direct search to Thomas Sperber for review; updated BLBG production logs and indexes accordingly; released the production and notified the team that Chakra_001 has been added to Relativity workspace and its available for review | 09 | 1.50 | \$475 | \$712.50 |
| 01/22/2026 | Randall Hirsch | Staff Attorney | Research projects re public disclosures | 09 | 10.00 | \$475 | \$4,750.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|----------------|-----------------------|---|-----------|-------|---------|------------|
| 01/22/2026 | Thomas Sperber | Associate | Review correspondence from third-party, draft and revise email re: not enforcing subpoena; weekly team meeting; draft and send email to Defendants re: amending RFA R&Os; work with new staff attorney on substantive questions | 09 | 1.75 | \$875 | \$1,531.25 |
| 01/22/2026 | Thomas Sperber | Associate | Work on class cert reply draft. | 07 | 1.00 | \$875 | \$875.00 |
| 01/22/2026 | Thomas Sperber | Associate | Review and revise draft deposition notice; work with team on proposal for deposition targets, including analysis of custodial records and hot docs. | 10 | 0.75 | \$875 | \$656.25 |
| 01/23/2026 | Abygail Krita | Associate | Draft class cert reply. | 07 | 2.00 | \$650 | \$1,300.00 |
| 01/23/2026 | Abygail Krita | Associate | Discuss draft class cert reply with expert. | 11 | 0.50 | \$650 | \$325.00 |
| 01/23/2026 | Abygail Krita | Associate | Send privilege log to defendants. | 09 | 0.25 | \$650 | \$162.50 |
| 01/23/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 3.75 | \$1,100 | \$4,125.00 |
| 01/23/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation; call with M.Cain re class cert reply report | 11 | 3.75 | \$1,100 | \$4,125.00 |
| 01/23/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 9.00 | \$450 | \$4,050.00 |
| 01/23/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec Coquin; meeting with Randall Hirsch regarding the status of his assignment | 09 | 8.75 | \$525 | \$4,593.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|-----------------|--------------------|---|-----------|-------|-------|------------|
| 01/23/2026 | Julio Velazquez | Litigation Support | Conferred with Abygail Kritt re: incoming Third Party Lori Carr production data for volume Carr_001; facilitated secure transfer of the production volume via secure link; extracted and evaluated the data; manipulated cross-reference files to append metadata, documents, and searchable text into the existing workspace; appended Carr_001 to the workspace and performed necessary updates; conducted quality control to ensure production accuracy; updated BLBG production logs and indexes accordingly; released the production and notified Abygail Kritt & the team that Carr_001 has been added to Relativity workspace and its available for review; conferred with Thomas Sperber re: incoming Third Party production data f; facilitated secure transfer of the production volume via secure link to secure location; extracted and evaluated the data; manipulated cross-reference files to append metadata, documents, and searchable text into the existing workspace; appended production to the workspace and performed necessary updates; conducted quality control to ensure production accuracy; updated BLBG production logs and indexes accordingly; released the production and notified Thomas Sperber & the team that production has been added to Relativity workspace and its available for review | 09 | 1.50 | \$475 | \$712.50 |
| 01/23/2026 | Randall Hirsch | Staff Attorney | Research projects re public disclosures | 09 | 7.00 | \$475 | \$3,325.00 |
| 01/23/2026 | Thomas Sperber | Associate | Call with Fideris staff to discuss edits/comments to draft Cain reply report | 11 | 0.50 | \$875 | \$437.50 |
| 01/23/2026 | Thomas Sperber | Associate | Review privilege log before service and discuss revisions with team | 09 | 1.00 | \$875 | \$875.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|--|-----------|-------|---------|------------|
| 01/23/2026 | Thomas Sperber | Associate | Work on class cert reply brief | 07 | 1.50 | \$875 | \$1,312.50 |
| 01/24/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec | 09 | 3.75 | \$525 | \$1,968.75 |
| 01/24/2026 | Randall Hirsch | Staff Attorney | Research projects re public disclosures | 09 | 4.25 | \$475 | \$2,018.75 |
| 01/26/2026 | Abygail Krita | Associate | Draft correspondence to defendants; research substantial completion case law. | 08 | 3.75 | \$650 | \$2,437.50 |
| 01/26/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply. | 07 | 1.75 | \$1,100 | \$1,925.00 |
| 01/26/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation. | 11 | 1.50 | \$1,100 | \$1,650.00 |
| 01/26/2026 | Alec Coquin | Senior Counsel | Drafted discovery correspondence and analysis of production analytics re same | 08 | 1.75 | \$1,100 | \$1,925.00 |
| 01/26/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve analyst reports from CapIQ and send to M. Cain | 11 | 2.50 | \$450 | \$1,125.00 |
| 01/26/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/26/2026 | Jared Hoffman | Senior Staff Attorney | Review Amended Complaint and background materials | 09 | 8.00 | \$525 | \$4,200.00 |
| 01/26/2026 | Juan Lossada | Senior Staff Attorney | Complete review of defendant and third party productions for material responsive to research questions from Alec Coquin; onboard Jared Hoffman and Young Lee onto the iRhythm review team. | 09 | 10.25 | \$525 | \$5,381.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 01/26/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: Relativity workspace access for internal users; added multiple internal users to corresponding review group & workspace as requested by Juan Lossada | 09 | 0.25 | \$475 | \$118.75 |
| 01/26/2026 | Randall Hirsch | Staff Attorney | Investor communications project/analyzed documents | 09 | 7.75 | \$475 | \$3,681.25 |
| 01/26/2026 | Roberto Santamarina | Litigation Support | Download, organize, extract, edit and load of Def prod iRhythm_009 and iRhythm_010. Quality check for accuracy, update index, run scripts, and release. | 09 | 2.00 | \$525 | \$1,050.00 |
| 01/26/2026 | Thomas Sperber | Associate | Work with staff attorneys and lit support on analyzing new production from Defendants. | 09 | 3.25 | \$875 | \$2,843.75 |
| 01/26/2026 | Thomas Sperber | Associate | Complete and send to K. Sinderson first full draft of class cert reply brief | 07 | 6.50 | \$875 | \$5,687.50 |
| 01/26/2026 | Young Lee | Senior Staff Attorney | Reviewed 2nd Amended Complaint and background materials to read into case | 09 | 3.50 | \$525 | \$1,837.50 |
| 01/26/2026 | Young Lee | Senior Staff Attorney | Reviewed 2nd Amended Complaint and FDA 583 letters as background materials for case | 09 | 1.50 | \$525 | \$787.50 |
| 01/27/2026 | Abygail Kritta | Associate | Review production on relativity; prepare summary of key metrics; draft correspondence to defendants. | 09 | 5.75 | \$650 | \$3,737.50 |
| 01/27/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 4.00 | \$1,100 | \$4,400.00 |
| 01/27/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 4.00 | \$1,100 | \$4,400.00 |
| 01/27/2026 | Cindy Bomzer-Stein | Case Manager | Search and retrieve journal articles regarding expert D. Skinner | 11 | 1.25 | \$450 | \$562.50 |
| 01/27/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 12.50 | \$450 | \$5,625.00 |
| 01/27/2026 | Jared Hoffman | Senior Staff Attorney | Review background materials and hot docs | 09 | 8.00 | \$525 | \$4,200.00 |
| 01/27/2026 | Juan Lossada | Senior Staff Attorney | Complete review of defendant and third party productions for material responsive to research questions from Alec Coquin; create SP folder for all documents presented at hot docs meetings to date; gather and circulate hot doc submissions for hot docs meeting on 1/28/2026. | 09 | 11.00 | \$525 | \$5,775.00 |
| 01/27/2026 | Katherine Sinderson | Partner | Discovery correspondence | 08 | 3.00 | \$1,600 | \$4,800.00 |
| 01/27/2026 | Katherine Sinderson | Partner | Review expert report | 11 | 3.00 | \$1,600 | \$4,800.00 |
| 01/27/2026 | Randall Hirsch | Staff Attorney | Investor communications project/analyzed documents | 09 | 9.00 | \$475 | \$4,275.00 |
| 01/27/2026 | Roberto Santamarina | Litigation Support | Run metrics (review and general) on Defendant data and provide results to the case team for use in meet-and-confer. | 09 | 2.00 | \$525 | \$1,050.00 |
| 01/27/2026 | Thomas Sperber | Associate | Review analysis on additional custodians and circulate findings; analyze and review new production from Defendants; discuss with team approach re: schedule extension | 09 | 2.50 | \$875 | \$2,187.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 01/27/2026 | Young Lee | Senior Staff Attorney | Reviewed SAC Order on MT and related filings to read into case | 09 | 7.25 | \$525 | \$3,806.25 |
| 01/28/2026 | Abygail Krita | Associate | Prepare for Skinner deposition. | 11 | 3.50 | \$650 | \$2,275.00 |
| 01/28/2026 | Abygail Krita | Associate | Review hot docs and attend hot docs meeting; attend and prepare for meet and confer; attend weekly call. | 09 | 4.75 | \$650 | \$3,087.50 |
| 01/28/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 3.00 | \$1,100 | \$3,300.00 |
| 01/28/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 1.75 | \$1,100 | \$1,925.00 |
| 01/28/2026 | Alec Coquin | Senior Counsel | M&C re privilege log and schedule impact; hot docs meeting; team strategy call | 09 | 3.00 | \$1,100 | \$3,300.00 |
| 01/28/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve analyst reports cited in D. Skinner expert report | 11 | 2.50 | \$450 | \$1,125.00 |
| 01/28/2026 | Daniel Akeret | Staff Attorney | Searched the documents responsive to research questions; participated in hot docs meeting | 09 | 8.00 | \$450 | \$3,600.00 |
| 01/28/2026 | Jared Hoffman | Senior Staff Attorney | Review background materials and hot docs | 09 | 4.00 | \$525 | \$2,100.00 |
| 01/28/2026 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.25 | \$450 | \$112.50 |
| 01/28/2026 | Juan Lossada | Senior Staff Attorney | Complete review of defendant and third party productions for material responsive to research questions from Alec Coquin, Tom Sperber, and Abby Krita | 09 | 9.75 | \$525 | \$5,118.75 |
| 01/28/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 0.75 | \$1,600 | \$1,200.00 |
| 01/28/2026 | Katherine Sinderson | Partner | Discovery call/commc'ns with team | 08 | 4.75 | \$1,600 | \$7,600.00 |
| 01/28/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket. email, docketed document and calendared event. Reviewed and updated filing plan. | 13 | 2.50 | \$500 | \$1,250.00 |
| 01/28/2026 | Paul Charlotin | Litigation Support | Created batch sets per J. Lossada's request | 09 | 2.00 | \$475 | \$950.00 |
| 01/28/2026 | Randall Hirsch | Staff Attorney | Hot doc meeting | 09 | 1.00 | \$475 | \$475.00 |
| 01/28/2026 | Randall Hirsch | Staff Attorney | Investor communications project/analyzed documents | 09 | 8.00 | \$475 | \$3,800.00 |
| 01/28/2026 | Thomas Sperber | Associate | Prepare for and attend M&C with defendants re: large production after substantial completion deadline and possible extension; team call to discuss status of discovery. | 08 | 2.00 | \$875 | \$1,750.00 |
| 01/28/2026 | Thomas Sperber | Associate | Team call to discuss reply drafting; work with team on new structure for class cert reply. | 07 | 1.00 | \$875 | \$875.00 |
| 01/28/2026 | Thomas Sperber | Associate | Draft and send email to defendants re: amending RFA R&Os | 09 | 0.50 | \$875 | \$437.50 |
| 01/28/2026 | Young Lee | Senior Staff Attorney | Attended weekly Hot Docs meeting w/J. Lossada | 09 | 1.00 | \$525 | \$525.00 |
| 01/28/2026 | Young Lee | Senior Staff Attorney | Reviewed documents from Batch 2 priority files | 09 | 3.75 | \$525 | \$1,968.75 |
| 01/28/2026 | Young Lee | Senior Staff Attorney | Reviewed P's RFPs FDA correspondence and hot docs as background materials for reading into case | 09 | 4.00 | \$525 | \$2,100.00 |
| 01/29/2026 | Abygail Krita | Associate | Draft class cert reply; draft joint stipulation and declaration re same. | 07 | 3.00 | \$650 | \$1,950.00 |
| 01/29/2026 | Abygail Krita | Associate | Prepare for Skinner deposition. | 11 | 2.75 | \$650 | \$1,787.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|-------------|
| 01/29/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 2.75 | \$1,100 | \$3,025.00 |
| 01/29/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 4.00 | \$1,100 | \$4,400.00 |
| 01/29/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve documents cited in D. Skinner expert report | 11 | 1.00 | \$450 | \$450.00 |
| 01/29/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 5.00 | \$450 | \$2,250.00 |
| 01/29/2026 | Jared Hoffman | Senior Staff Attorney | Review and code Defendant document productions | 09 | 7.50 | \$525 | \$3,937.50 |
| 01/29/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec Coquin, Tom Sperber, and Abby Krita; respond to requests from new team members (Jared Hoffman and Young Lee) to review documents they think are hot; describe and assign project to Randall Hirsch | 09 | 2.00 | \$525 | \$1,050.00 |
| 01/29/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 6.75 | \$1,600 | \$10,800.00 |
| 01/29/2026 | Mahiri Buffong | Managing Clerk | Reviewed email and docket and confirmed deadline source for attorney. | 13 | 0.75 | \$500 | \$375.00 |
| 01/29/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 4.00 | \$475 | \$1,900.00 |
| 01/29/2026 | Randall Hirsch | Staff Attorney | Investor communications project/analyzed documents | 09 | 5.00 | \$475 | \$2,375.00 |
| 01/29/2026 | Thomas Sperber | Associate | Incorporate K. Sinderson comments to operative reply in further support of class cert and circulate for review | 07 | 6.50 | \$875 | \$5,687.50 |
| 01/29/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded documents from Batch priority 2. | 09 | 3.00 | \$525 | \$1,575.00 |
| 01/29/2026 | Young Lee | Senior Staff Attorney | Reviewed documents from Priority 2 batch; provided summary and hot docs to team lead | 09 | 5.50 | \$525 | \$2,887.50 |
| 01/30/2026 | Abyigail Krita | Associate | Draft class cert reply. | 07 | 3.50 | \$650 | \$2,275.00 |
| 01/30/2026 | Alec Coquin | Senior Counsel | Call with expert re reply report; Dr. Thomas deposition preparation | 11 | 2.75 | \$1,100 | \$3,025.00 |
| 01/30/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 3.50 | \$1,100 | \$3,850.00 |
| 01/30/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 6.50 | \$450 | \$2,925.00 |
| 01/30/2026 | Jared Hoffman | Senior Staff Attorney | Staff attorney team call; review and code defendant productions | 09 | 8.00 | \$525 | \$4,200.00 |
| 01/30/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec Coquin, Tom Sperber, and Abby Krita; create review team meeting agenda; attend review team meeting; create and start to populate spreadsheet with all hot doc submissions from hot doc meetings (11/20/2025 and 11/26/2025) | 09 | 6.50 | \$525 | \$3,412.50 |
| 01/30/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 5.75 | \$1,600 | \$9,200.00 |
| 01/30/2026 | Randall Hirsch | Staff Attorney | Research and review defendant and third party document productions for assigned project | 09 | 5.25 | \$475 | \$2,493.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|-------------|
| 01/30/2026 | Thomas Sperber | Associate | Work on class cert reply draft. | 07 | 7.25 | \$875 | \$6,343.75 |
| 01/30/2026 | Thomas Sperber | Associate | Call with expert to discuss expert report comments | 11 | 0.75 | \$875 | \$656.25 |
| 01/30/2026 | Young Lee | Senior Staff Attorney | Attended weekly review team meeting with J. Lossada | 09 | 0.25 | \$525 | \$131.25 |
| 01/30/2026 | Young Lee | Senior Staff Attorney | Conducted follow-up research on submitted potential hot docs with questions | 09 | 1.75 | \$525 | \$918.75 |
| 01/30/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded 3rd priority batch from defendants' production | 09 | 2.50 | \$525 | \$1,312.50 |
| 01/30/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded documents from third priority batch of defendants' production | 09 | 1.75 | \$525 | \$918.75 |
| 01/31/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 1.50 | \$1,100 | \$1,650.00 |
| 01/31/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 1.75 | \$1,100 | \$1,925.00 |
| 01/31/2026 | Juan Lossada | Senior Staff Attorney | Complete spreadsheet listing all hot doc submissions from all hot docs meetings (12/10/2025, 12/17/2025, 12/31/2025, 1/14/2026, and 1/28/2025). | 09 | 2.75 | \$525 | \$1,443.75 |
| 02/01/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 2.00 | \$1,100 | \$2,200.00 |
| 02/01/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 2.00 | \$1,100 | \$2,200.00 |
| 02/01/2026 | Juan Lossada | Senior Staff Attorney | Review defendant and third party productions for material responsive to research questions from Alec Coquin; create review team meeting agenda; attend review team meeting; run new searches re team questions | 09 | 4.00 | \$525 | \$2,100.00 |
| 02/01/2026 | Katherine Sinderson | Partner | Revising class cert expert reply | 07 | 1.75 | \$1,600 | \$2,800.00 |
| 02/01/2026 | Thomas Sperber | Associate | Work on draft class cert reply brief | 07 | 3.50 | \$875 | \$3,062.50 |
| 02/01/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded Priority 3 batch documents | 09 | 2.25 | \$525 | \$1,181.25 |
| 02/02/2026 | Abygail Krita | Associate | Draft class cert reply. | 07 | 4.00 | \$650 | \$2,600.00 |
| 02/02/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply | 07 | 5.75 | \$1,100 | \$6,325.00 |
| 02/02/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation | 11 | 1.00 | \$1,100 | \$1,100.00 |
| 02/02/2026 | Cindy Bomzer-Stein | Case Manager | Communicate with court reporters regarding upcoming expert depositions | 13 | 0.75 | \$450 | \$337.50 |
| 02/02/2026 | Daniel Ackeret | Staff Attorney | Searched the documents surrounding the 2024 FDA audit | 09 | 8.00 | \$450 | \$3,600.00 |
| 02/02/2026 | Janielle Lattimore | Assistant Managing Clerk | Review rules, procedures, docket, and update filing plan for reply in further support of class certification | 07 | 3.00 | \$475 | \$1,425.00 |
| 02/02/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant productions | 09 | 8.00 | \$525 | \$4,200.00 |
| 02/02/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 02/02/2026 | Juan Lossada | Senior Staff Attorney | Searched for documents responsive to research questions | 09 | 8.25 | \$525 | \$4,331.25 |
| 02/02/2026 | Katherine Sinderson | Partner | Revising class cert expert reply | 07 | 7.75 | \$1,600 | \$12,400.00 |
| 02/02/2026 | Randall Hirsch | Staff Attorney | Marketing/penetration project research | 09 | 8.25 | \$475 | \$3,918.75 |
| 02/02/2026 | Thomas Sperber | Associate | Work on class cert reply draft | 07 | 6.50 | \$875 | \$5,687.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|-------------|
| 02/02/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded documents from Defendant's production and selected hot docs | 09 | 8.50 | \$525 | \$4,462.50 |
| 02/03/2026 | Abygail Krita | Associate | Draft class cert reply. | 07 | 4.50 | \$650 | \$2,925.00 |
| 02/03/2026 | Abygail Krita | Associate | Prepare for Thomas and Skinner depositions. | 11 | 4.25 | \$650 | \$2,762.50 |
| 02/03/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply; team strategy call re class cert reply; filing plan meeting. | 07 | 5.25 | \$1,100 | \$5,775.00 |
| 02/03/2026 | Alec Coquin | Senior Counsel | Dr. Thomas deposition preparation. | 11 | 1.25 | \$1,100 | \$1,375.00 |
| 02/03/2026 | Cindy Bomzer-Stein | Case Manager | Draft administrative sealing motion regarding class certification reply | 07 | 2.25 | \$450 | \$1,012.50 |
| 02/03/2026 | Cindy Bomzer-Stein | Case Manager | Attend filing plan meeting regarding class certification reply | 07 | 0.25 | \$450 | \$112.50 |
| 02/03/2026 | Daniel Ackeret | Staff Attorney | Searched for documents responsive to research questions | 09 | 7.00 | \$450 | \$3,150.00 |
| 02/03/2026 | Janielle Lattimore | Assistant Managing Clerk | Filing plan meeting; Review and revise filing plan per meeting updates | 07 | 1.25 | \$475 | \$593.75 |
| 02/03/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant productions; search for documents relevant to research project assigned by Alec Coquin and K Sinderson | 09 | 9.50 | \$525 | \$4,987.50 |
| 02/03/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 02/03/2026 | Juan Lossada | Senior Staff Attorney | Review and code defendant productions; search for documents relevant to research project assigned by Alec Coquin and K Sinderson; assist other staff attorneys with search | 09 | 7.75 | \$525 | \$4,068.75 |
| 02/03/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 3.50 | \$1,600 | \$5,600.00 |
| 02/03/2026 | Katherine Sinderson | Partner | Prepping for expert deposition | 11 | 3.75 | \$1,600 | \$6,000.00 |
| 02/03/2026 | Mahiri Buffong | Managing Clerk | Reviewed updated filing plan for compliance. | 07 | 1.00 | \$500 | \$500.00 |
| 02/03/2026 | Randall Hirsch | Staff Attorney | Research project; other requested research projects | 09 | 9.00 | \$475 | \$4,275.00 |
| 02/03/2026 | Thomas Sperber | Associate | Call to discuss class cert reply draft; incorporate major structural and substantive comments to reply draft and circulate to team for review; call with defs re: schedule extension; finalize and circulate draft of papers reflecting schedule extension | 07 | 12.00 | \$875 | \$10,500.00 |
| 02/03/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded documents from Defendants' fourth production | 09 | 6.50 | \$525 | \$3,412.50 |
| 02/03/2026 | Young Lee | Senior Staff Attorney | Summarized and submitted hot docs for presentation | 09 | 0.75 | \$525 | \$393.75 |
| 02/04/2026 | Abygail Krita | Associate | Draft class cert reply. | 07 | 5.00 | \$650 | \$3,250.00 |
| 02/04/2026 | Abygail Krita | Associate | Prepare for Thomas and Skinner depositions. | 11 | 3.50 | \$650 | \$2,275.00 |
| 02/04/2026 | Alec Coquin | Senior Counsel | Preparation for deposition of Dr. Thomas | 11 | 7.00 | \$1,100 | \$7,700.00 |
| 02/04/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve documents for D. Skinner deposition | 11 | 0.50 | \$450 | \$225.00 |
| 02/04/2026 | Cindy Bomzer-Stein | Case Manager | Organize files for printing regarding G. Thomas deposition | 11 | 0.50 | \$450 | \$225.00 |
| 02/04/2026 | Daniel Ackeret | Staff Attorney | Hot docs meeting | 09 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|---|-----------|-------|---------|------------|
| 02/04/2026 | Daniel Ackeret | Staff Attorney | Searched for docs re class certification | 06 | 8.50 | \$450 | \$3,825.00 |
| 02/04/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant productions; weekly team meeting; search for documents responsive to research questions | 09 | 8.00 | \$525 | \$4,200.00 |
| 02/04/2026 | Juan Lossada | Senior Staff Attorney | Complete review of search re Alec Coquin assignment (2.5 hrs); attended hot docs meeting (0.5 hrs); complete review of search re T. Sperber assignment (5.5 hrs). | 09 | 8.50 | \$525 | \$4,462.50 |
| 02/04/2026 | Juan Lossada | Senior Staff Attorney | Locate and pdf 30 exhibits for the class cert reply. | 07 | 2.00 | \$525 | \$1,050.00 |
| 02/04/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 1.50 | \$475 | \$712.50 |
| 02/04/2026 | Randall Hirsch | Staff Attorney | Hot doc follow up searches | 09 | 2.50 | \$475 | \$1,187.50 |
| 02/04/2026 | Randall Hirsch | Staff Attorney | Hot doc meeting | 09 | 0.50 | \$475 | \$237.50 |
| 02/04/2026 | Randall Hirsch | Staff Attorney | Continue previously assigned research project | 09 | 4.00 | \$475 | \$1,900.00 |
| 02/04/2026 | Thomas Sperber | Associate | Weekly team meeting; hot docs call | 09 | 1.50 | \$875 | \$1,312.50 |
| 02/04/2026 | Thomas Sperber | Associate | Work on class cert reply draft. | 07 | 6.75 | \$875 | \$5,906.25 |
| 02/04/2026 | Thomas Sperber | Associate | Review and comment on draft expert rebuttal report | 11 | 1.25 | \$875 | \$1,093.75 |
| 02/04/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded Jason Shaw custodial docs from Defendants' 4th Production | 09 | 7.50 | \$525 | \$3,937.50 |
| 02/04/2026 | Young Lee | Senior Staff Attorney | Attended and presented doc in Hot Docs meeting w/J. Lossada | 09 | 0.50 | \$525 | \$262.50 |
| 02/05/2026 | Abygail Krita | Associate | Deposition of Dr. George Thomas. | 11 | 6.00 | \$650 | \$3,900.00 |
| 02/05/2026 | Abygail Krita | Associate | Draft joint stipulation; draft class cert reply. | 07 | 4.25 | \$650 | \$2,762.50 |
| 02/05/2026 | Alec Coquin | Senior Counsel | Took deposition of Dr. Thomas | 11 | 6.00 | \$1,100 | \$6,600.00 |
| 02/05/2026 | Alec Coquin | Senior Counsel | Preparation for deposition of Dr. Thomas | 11 | 2.25 | \$1,100 | \$2,475.00 |
| 02/05/2026 | Alec Coquin | Senior Counsel | Researched and drafted reply in support of class certification and supporting papers | 07 | 5.00 | \$1,100 | \$5,500.00 |
| 02/05/2026 | Cindy Bomzer-Stein | Case Manager | Cite check reply brief | 07 | 2.75 | \$450 | \$1,237.50 |
| 02/05/2026 | Cindy Bomzer-Stein | Case Manager | Print exhibits regarding G. Thomas deposition | 11 | 1.00 | \$450 | \$450.00 |
| 02/05/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve and prepare exhibits regarding D. Skinner deposition | 11 | 3.00 | \$450 | \$1,350.00 |
| 02/05/2026 | Daniel Ackeret | Staff Attorney | Searched for documents regarding the class cert issues | 07 | 4.25 | \$450 | \$1,912.50 |
| 02/05/2026 | Daniel Ackeret | Staff Attorney | Expert witness research | 11 | 4.25 | \$450 | \$1,912.50 |
| 02/05/2026 | Jared Hoffman | Senior Staff Attorney | Compile exhibits for Class Certification Reply | 07 | 1.50 | \$525 | \$787.50 |
| 02/05/2026 | Jared Hoffman | Senior Staff Attorney | Continue previously assigned research project | 09 | 5.00 | \$525 | \$2,625.00 |
| 02/05/2026 | Jared Hoffman | Senior Staff Attorney | Review and code Defendant productions | 09 | 2.00 | \$525 | \$1,050.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 02/05/2026 | Juan Lossada | Senior Staff Attorney | Follow up with Litigation Support regarding propagation of date metadata and report back to team re same (0.25 hrs); run requested search terms through the new productions (009 and 010) with date limits prior to the 1st disclosure and collect materials re same (5.25 hrs) | 09 | 5.50 | \$525 | \$2,887.50 |
| 02/05/2026 | Juan Lossada | Senior Staff Attorney | Run additional searches for missing analyst reports that are exhibits to the class cert reply. | 07 | 1.00 | \$525 | \$525.00 |
| 02/05/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 5.00 | \$1,600 | \$8,000.00 |
| 02/05/2026 | Katherine Sinderson | Partner | Prepping for deposition | 10 | 7.25 | \$1,600 | \$11,600.00 |
| 02/05/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 9.00 | \$475 | \$4,275.00 |
| 02/05/2026 | Thomas Sperber | Associate | Work on class cert reply draft; finalize class cert reply draft for client review; call with Matt Cain to discuss brief comments and finalizing reply expert report | 07 | 10.00 | \$875 | \$8,750.00 |
| 02/05/2026 | Thomas Sperber | Associate | Call with Matt Cain to discuss brief comments and finalizing reply expert report | 11 | 2.00 | \$875 | \$1,750.00 |
| 02/05/2026 | Young Lee | Senior Staff Attorney | Researched specific disclosures and uploaded responsive docs | 09 | 4.75 | \$525 | \$2,493.75 |
| 02/05/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded Jason Shaw documents from Defs' 4th production | 09 | 4.25 | \$525 | \$2,231.25 |
| 02/06/2026 | Abygail Krita | Associate | Draft class certification reply and organize exhibits. | 07 | 11.00 | \$650 | \$7,150.00 |
| 02/06/2026 | Alec Coquin | Senior Counsel | Researched and drafted class cert reply brief | 07 | 0.75 | \$1,100 | \$825.00 |
| 02/06/2026 | Cindy Bomzer-Stein | Case Manager | Cite check reply brief | 07 | 5.00 | \$450 | \$2,250.00 |
| 02/06/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve and prepare exhibits regarding D. Skinner deposition | 11 | 1.00 | \$450 | \$450.00 |
| 02/06/2026 | Cindy Bomzer-Stein | Case Manager | Organize binder regarding class certification reply exhibits | 07 | 1.00 | \$450 | \$450.00 |
| 02/06/2026 | Daniel Ackeret | Staff Attorney | Searched for documents regarding class cert issues | 07 | 3.75 | \$450 | \$1,687.50 |
| 02/06/2026 | Daniel Ackeret | Staff Attorney | Expert witness research | 11 | 3.75 | \$450 | \$1,687.50 |
| 02/06/2026 | Jared Hoffman | Senior Staff Attorney | Continue previously assigned research project | 09 | 4.00 | \$525 | \$2,100.00 |
| 02/06/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant productions | 09 | 4.00 | \$525 | \$2,100.00 |
| 02/06/2026 | Jessica Lacon | Docket Clerk | Update diaries | 13 | 1.00 | \$450 | \$450.00 |
| 02/06/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 1.75 | \$1,600 | \$2,800.00 |
| 02/06/2026 | Katherine Sinderson | Partner | Taking Dr. Skinner deposition | 11 | 7.00 | \$1,600 | \$11,200.00 |
| 02/06/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 5.25 | \$475 | \$2,493.75 |
| 02/06/2026 | Thomas Sperber | Associate | Second chair deposition of Defendants' damages expert, Dr. Skinner. | 11 | 7.00 | \$875 | \$6,125.00 |
| 02/06/2026 | Thomas Sperber | Associate | Work on class cert reply brief, including incorporating testimony from damages expert deposition | 07 | 2.25 | \$875 | \$1,968.75 |
| 02/06/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded iRhythm and Acevedo custodial docs from Defs 4th production | 09 | 7.25 | \$525 | \$3,806.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 02/07/2026 | Abygail Kritta | Associate | Draft class certification reply and accompanying materials. | 07 | 7.25 | \$650 | \$4,712.50 |
| 02/07/2026 | Alec Coquin | Senior Counsel | Researched and drafted reply in support of class certification and supporting papers | 07 | 9.75 | \$1,100 | \$10,725.00 |
| 02/07/2026 | Cindy Bomzer-Stein | Case Manager | Cite check reply brief | 07 | 2.00 | \$450 | \$900.00 |
| 02/07/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 4.75 | \$1,600 | \$7,600.00 |
| 02/07/2026 | Thomas Sperber | Associate | Work on final comments and edits to class cert reply | 07 | 6.00 | \$875 | \$5,250.00 |
| 02/08/2026 | Abygail Kritta | Associate | Draft class cert reply and accompanying materials. | 07 | 6.00 | \$650 | \$3,900.00 |
| 02/08/2026 | Alec Coquin | Senior Counsel | Researched and drafted reply in support of class certification and supporting papers | 07 | 6.00 | \$1,100 | \$6,600.00 |
| 02/08/2026 | Juan Lossada | Senior Staff Attorney | Continue previously assigned research project | 09 | 4.00 | \$525 | \$2,100.00 |
| 02/08/2026 | Juan Lossada | Senior Staff Attorney | Gather additional class cert reply exhibits for Abby Kritta. | 07 | 0.50 | \$525 | \$262.50 |
| 02/08/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 5.75 | \$1,600 | \$9,200.00 |
| 02/08/2026 | Thomas Sperber | Associate | Work on class cert reply brief for filing tomorrow | 07 | 4.50 | \$875 | \$3,937.50 |
| 02/09/2026 | Abygail Kritta | Associate | Draft and file class certification reply brief and exhibits. | 07 | 13.50 | \$650 | \$8,775.00 |
| 02/09/2026 | Alec Coquin | Senior Counsel | Researched, drafted, and filed reply in further support of class certification and supporting papers; discussions re same | 07 | 14.00 | \$1,100 | \$15,400.00 |
| 02/09/2026 | Cindy Bomzer-Stein | Case Manager | Cite check reply brief | 07 | 7.00 | \$450 | \$3,150.00 |
| 02/09/2026 | Cindy Bomzer-Stein | Case Manager | Revise and finalize exhibits and motion papers for filing | 07 | 8.50 | \$450 | \$3,825.00 |
| 02/09/2026 | Jared Hoffman | Senior Staff Attorney | Review draft class certification reply brief and highlight relevant portions of cited exhibits | 07 | 4.00 | \$525 | \$2,100.00 |
| 02/09/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant document productions | 09 | 3.50 | \$525 | \$1,837.50 |
| 02/09/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 02/09/2026 | Juan Lossada | Senior Staff Attorney | Continue previously assigned research project | 09 | 2.50 | \$525 | \$1,312.50 |
| 02/09/2026 | Katherine Sinderson | Partner | Revising class cert reply | 07 | 14.75 | \$1,600 | \$23,600.00 |
| 02/09/2026 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, filed and docketed documents. | 07 | 1.00 | \$500 | \$500.00 |
| 02/09/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and order, docketed documents and adjourned and calendared events. | 07 | 1.50 | \$500 | \$750.00 |
| 02/09/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 8.50 | \$475 | \$4,037.50 |
| 02/09/2026 | Thomas Sperber | Associate | Finalize class cert reply submission | 07 | 13.50 | \$875 | \$11,812.50 |
| 02/09/2026 | Young Lee | Senior Staff Attorney | Reviewed Acevedo custodial docs from Defs' 4th production; identified hot docs | 09 | 8.25 | \$525 | \$4,331.25 |
| 02/10/2026 | Abygail Kritta | Associate | Draft response to defendants administrative motion; review documents. | 07 | 6.50 | \$650 | \$4,225.00 |
| 02/10/2026 | Alec Coquin | Senior Counsel | Researched and drafted opposition to motion for sur reply; correspondence with Defendants re same | 07 | 7.75 | \$1,100 | \$8,525.00 |
| 02/10/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve related case appellate filing | 13 | 0.25 | \$450 | \$112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|------------|
| 02/10/2026 | Cindy Bomzer-Stein | Case Manager | Revise and finalize exhibits and motion papers for filing | 07 | 1.50 | \$450 | \$675.00 |
| 02/10/2026 | Jared Hoffman | Senior Staff Attorney | Review draft class cert brief and highlight relevant language in cited exhibits | 07 | 2.00 | \$525 | \$1,050.00 |
| 02/10/2026 | Jared Hoffman | Senior Staff Attorney | Prepare hot document submission and presentation for 2/11 team meeting | 09 | 0.50 | \$525 | \$262.50 |
| 02/10/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant document productions | 09 | 5.50 | \$525 | \$2,887.50 |
| 02/10/2026 | Juan Lossada | Senior Staff Attorney | Review hot doc submissions, update hot doc spreadsheet with new submissions and descriptions, add submissions to SP 2.11.2026 folder, and circulate submissions and spreadsheet to the team. | 09 | 0.75 | \$525 | \$393.75 |
| 02/10/2026 | Katherine Sinderson | Partner | Revising class cert sur-reply | 07 | 1.75 | \$1,600 | \$2,800.00 |
| 02/10/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 8.50 | \$475 | \$4,037.50 |
| 02/10/2026 | Thomas Sperber | Associate | Continue finalizing and coordinate filing of class cert reply submission | 07 | 4.75 | \$875 | \$4,156.25 |
| 02/10/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded Acevedo custodial docs from Defs 4th production | 09 | 2.00 | \$525 | \$1,050.00 |
| 02/10/2026 | Young Lee | Senior Staff Attorney | Summarized and uploaded hot docs for meeting; prepared presentation | 09 | 0.75 | \$525 | \$393.75 |
| 02/11/2026 | Abygail Kritta | Associate | Draft response to defendants administrative motion for surreply. | 07 | 1.75 | \$650 | \$1,137.50 |
| 02/11/2026 | Abygail Kritta | Associate | Attend weekly team calls to discuss case strategy and document review progress | 09 | 1.00 | \$650 | \$650.00 |
| 02/11/2026 | Alec Coquin | Senior Counsel | Researched, drafted, and filed opposition to motion for sur reply | 07 | 7.00 | \$1,100 | \$7,700.00 |
| 02/11/2026 | Alec Coquin | Senior Counsel | Team strategy meeting re discovery; attended hot docs call and follow-up re same | 09 | 2.50 | \$1,100 | \$2,750.00 |
| 02/11/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve cases cited in class certification reply brief | 07 | 0.50 | \$450 | \$225.00 |
| 02/11/2026 | Cindy Bomzer-Stein | Case Manager | Finalize and prepare for filing regarding opposition brief regarding defendants' administrative motion to file sur-reply | 07 | 0.75 | \$450 | \$337.50 |
| 02/11/2026 | Cindy Bomzer-Stein | Case Manager | Cite check opposition brief regarding defendants' administrative motion to file sur-reply | 07 | 1.75 | \$450 | \$787.50 |
| 02/11/2026 | Janielle Lattimore | Assistant Managing Clerk | Electronic filing of Opposition to Motion for Leave to File Surreply | 07 | 1.00 | \$475 | \$475.00 |
| 02/11/2026 | Jared Hoffman | Senior Staff Attorney | Weekly team hot docs meeting | 09 | 0.75 | \$525 | \$393.75 |
| 02/11/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant document productions | 09 | 6.75 | \$525 | \$3,543.75 |
| 02/11/2026 | Juan Lossada | Senior Staff Attorney | Run analytics on unreviewed defendant documents (0.25 hrs); attend iRhythm hot docs meeting (0.75 hrs); organize project assignments for staff attorneys following hot docs meeting (0.25 hrs); perform factual research regarding requested topic (1.25 hrs). | 09 | 2.50 | \$525 | \$1,312.50 |
| 02/11/2026 | Katherine Sinderson | Partner | Revising class cert sur-reply | 07 | 5.50 | \$1,600 | \$8,800.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 02/11/2026 | Katherine Sinderson | Partner | Hot docs meeting, team meeting | 09 | 1.00 | \$1,600 | \$1,600.00 |
| 02/11/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and motion, docketed documents and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 02/11/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 3.50 | \$475 | \$1,662.50 |
| 02/11/2026 | Randall Hirsch | Staff Attorney | Hot doc meeting | 09 | 1.00 | \$475 | \$475.00 |
| 02/11/2026 | Randall Hirsch | Staff Attorney | Search and review requested searches | 09 | 4.25 | \$475 | \$2,018.75 |
| 02/11/2026 | Thomas Sperber | Associate | Weekly team call; hot docs call. | 09 | 1.00 | \$875 | \$875.00 |
| 02/11/2026 | Thomas Sperber | Associate | Work on, finalize, and file opposition to defs' motion for surreply. | 07 | 4.00 | \$875 | \$3,500.00 |
| 02/11/2026 | Young Lee | Senior Staff Attorney | Attended Team Hot Docs meeting with J. Lossada and presented hot doc | 09 | 0.75 | \$525 | \$393.75 |
| 02/11/2026 | Young Lee | Senior Staff Attorney | Researched requested research project | 09 | 4.00 | \$525 | \$2,100.00 |
| 02/12/2026 | Alec Coquin | Senior Counsel | Document review and analysis re research project; drafted summary re same | 09 | 4.75 | \$1,100 | \$5,225.00 |
| 02/12/2026 | Jared Hoffman | Senior Staff Attorney | Research specific requested topics by A Coquin | 09 | 8.00 | \$525 | \$4,200.00 |
| 02/12/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 1.00 | \$450 | \$450.00 |
| 02/12/2026 | Juan Lossada | Senior Staff Attorney | Conduct additional research on the internet regarding ielephant devices and prepare updated report re same. | 09 | 1.50 | \$525 | \$787.50 |
| 02/12/2026 | Randall Hirsch | Staff Attorney | Requested searches re research project | 09 | 9.25 | \$475 | \$4,393.75 |
| 02/12/2026 | Young Lee | Senior Staff Attorney | Researched and drafted memo on internal iRhythm process | 09 | 8.25 | \$525 | \$4,331.25 |
| 02/13/2026 | Abygail Krita | Associate | Draft email to opposing counsel noticing depositions. | 10 | 1.00 | \$650 | \$650.00 |
| 02/13/2026 | Abygail Krita | Associate | Draft mediation statement. | 12 | 1.25 | \$650 | \$812.50 |
| 02/13/2026 | Alec Coquin | Senior Counsel | Document review and analysis re research topics; drafted summary re same | 09 | 2.00 | \$1,100 | \$2,200.00 |
| 02/13/2026 | Daniel Ackeret | Staff Attorney | Searched for documents regarding class cert issues | 07 | 3.00 | \$450 | \$1,350.00 |
| 02/13/2026 | Daniel Ackeret | Staff Attorney | Expert witness research | 11 | 5.00 | \$450 | \$2,250.00 |
| 02/13/2026 | Jared Hoffman | Senior Staff Attorney | Staff attorney team meeting. | 09 | 0.75 | \$525 | \$393.75 |
| 02/13/2026 | Jared Hoffman | Senior Staff Attorney | Correspondence with J. Lossada re: dep prep protocol | 10 | 0.50 | \$525 | \$262.50 |
| 02/13/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant document productions | 09 | 6.00 | \$525 | \$3,150.00 |
| 02/13/2026 | Juan Lossada | Senior Staff Attorney | Prepare agenda for review team meeting (0.25 hrs); attend review team meeting (0.25 hrs); start review of batch set 004, batch 7 documents (3.75 hrs). | 09 | 4.25 | \$525 | \$2,231.25 |
| 02/13/2026 | Randall Hirsch | Staff Attorney | Requested searches re research project | 09 | 4.25 | \$475 | \$2,018.75 |
| 02/13/2026 | Young Lee | Senior Staff Attorney | Attended weekly Review team meeting w/J. Lossada to discuss upcoming case schedule | 09 | 0.25 | \$525 | \$131.25 |
| 02/13/2026 | Young Lee | Senior Staff Attorney | Researched and drafted memo on internal iRhythm process | 09 | 6.75 | \$525 | \$3,543.75 |
| 02/16/2026 | Abygail Krita | Associate | Draft mediation statement. | 12 | 1.75 | \$650 | \$1,137.50 |
| 02/17/2026 | Abygail Krita | Associate | Draft privilege log dispute letter; prepare for meet and confer with opposing counsel. | 09 | 3.25 | \$650 | \$2,112.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|--|-----------|-------|---------|------------|
| 02/17/2026 | Abygail Krita | Associate | Draft mediation statement. | 12 | 6.00 | \$650 | \$3,900.00 |
| 02/17/2026 | Alec Coquin | Senior Counsel | Hot doc review and analysis and follow-up searches re same | 09 | 2.50 | \$1,100 | \$2,750.00 |
| 02/17/2026 | Alec Coquin | Senior Counsel | Document review and analysis re requested research topic; drafted summary re same; privilege log review and analysis | 09 | 4.00 | \$1,100 | \$4,400.00 |
| 02/17/2026 | Cindy Bomzer-Stein | Case Manager | Organize reply papers for upload to iManage and Sharepoint | 07 | 1.00 | \$450 | \$450.00 |
| 02/17/2026 | Daniel Ackeret | Staff Attorney | Quick review of team projects from last week and review for hot docs this week | 09 | 8.00 | \$450 | \$3,600.00 |
| 02/17/2026 | Jared Hoffman | Senior Staff Attorney | Set up deposition kit saved searches on Relativity | 10 | 1.00 | \$525 | \$525.00 |
| 02/17/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant productions | 09 | 6.75 | \$525 | \$3,543.75 |
| 02/17/2026 | Juan Lossada | Senior Staff Attorney | Redesign defendant depo kit coding panel | 09 | 0.25 | \$525 | \$131.25 |
| 02/17/2026 | Juan Lossada | Senior Staff Attorney | Work to evaluate iRhythm privilege log (2.75 hrs); review saved search documents for imaging issues and elevate to Tom Sperber and Abby Krita (0.5 hrs); update hot docs spreadsheet and pdf folder with hot docs submissions for 2/18 hot docs meeting (0.25 hrs); continue review of batch set 004, batch 7 documents and request addition of issue tags (0.75 hrs). | 09 | 4.25 | \$525 | \$2,231.25 |
| 02/17/2026 | Paul Charlotin | Litigation Support | OCR defendant documents; Create custom index to identify similar documents as well as slipsheeted documents per Juan's request; Provided saved search of request for review | 09 | 2.00 | \$475 | \$950.00 |
| 02/17/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 5.75 | \$475 | \$2,731.25 |
| 02/17/2026 | Thomas Sperber | Associate | Draft and send letter re: demand for DOJ communications; work with staff attorneys on doc production issues for follow-up with defendants | 09 | 2.50 | \$875 | \$2,187.50 |
| 02/17/2026 | Young Lee | Senior Staff Attorney | Further research and revised internal company process memo; uploaded supporting docs and circulated to team; reviewed potential hot docs for presenting to team; reviewed depo kit coding panel and provided feedback | 09 | 7.25 | \$525 | \$3,806.25 |
| 02/18/2026 | Abygail Krita | Associate | Attend calls with team; draft correspondence with defendants; review and discuss privilege log. | 09 | 5.25 | \$650 | \$3,412.50 |
| 02/18/2026 | Alec Coquin | Senior Counsel | Weekly team strategy call | 09 | 0.50 | \$1,100 | \$550.00 |
| 02/18/2026 | Daniel Ackeret | Staff Attorney | Prep for Hot docs meetings and search for specified research topic | 09 | 8.00 | \$450 | \$3,600.00 |
| 02/18/2026 | Jared Hoffman | Senior Staff Attorney | Create/revise dep prep saved searches on Relativity | 10 | 0.50 | \$525 | \$262.50 |
| 02/18/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant document productions | 09 | 7.50 | \$525 | \$3,937.50 |
| 02/18/2026 | Juan Lossada | Senior Staff Attorney | Review new depo schedule and set up depo kit tags for former iRhythm employee | 10 | 0.25 | \$525 | \$131.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|--|-----------|-------|---------|------------|
| 02/18/2026 | Juan Lossada | Senior Staff Attorney | Attend meeting with Abby Krita and Randall Hirsch re privilege log (0.5 hrs); start review of privilege log entry deficiencies 1 - 258 (3.5 hrs). | 09 | 4.00 | \$525 | \$2,100.00 |
| 02/18/2026 | Julio Velazquez | Litigation Support | Created new Depo Kit name within coding layout as requested by Juan Lossada; notified same that new depo kit choice has been created | 10 | 0.25 | \$475 | \$118.75 |
| 02/18/2026 | Katherine Sinderson | Partner | Prep for class cert hearing | 07 | 2.75 | \$1,600 | \$4,400.00 |
| 02/18/2026 | Paul Charlotin | Litigation Support | Add/Modified requested Layout(s), View(s), Field (s), &/or Tag(s)/Choices(s) per Juan Lossada's request | 09 | 0.25 | \$475 | \$118.75 |
| 02/18/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents | 09 | 2.50 | \$475 | \$1,187.50 |
| 02/18/2026 | Randall Hirsch | Staff Attorney | Privilege Log project | 09 | 3.50 | \$475 | \$1,662.50 |
| 02/18/2026 | Thomas Sperber | Associate | Weekly team meeting. | 09 | 0.75 | \$875 | \$656.25 |
| 02/18/2026 | Thomas Sperber | Associate | Class cert oral argument prep for K. Sinderson | 07 | 1.75 | \$875 | \$1,531.25 |
| 02/18/2026 | Young Lee | Senior Staff Attorney | Coded Shaw and Dunn custodial documents | 09 | 8.25 | \$525 | \$4,331.25 |
| 02/19/2026 | Abygail Krita | Associate | Draft correspondence to defendants; research privilege law and draft privilege log dispute letter. | 09 | 2.75 | \$650 | \$1,787.50 |
| 02/19/2026 | Alec Coquin | Senior Counsel | Analysis of Defendants' privilege log re challenges re same | 09 | 3.00 | \$1,100 | \$3,300.00 |
| 02/19/2026 | Alec Coquin | Senior Counsel | Deponent review and analysis | 10 | 0.50 | \$1,100 | \$550.00 |
| 02/19/2026 | Cindy Bomzer-Stein | Case Manager | Organize binders regarding oral argument | 07 | 4.00 | \$450 | \$1,800.00 |
| 02/19/2026 | Daniel Ackeret | Staff Attorney | Search and build folder for requested research topic | 09 | 8.00 | \$450 | \$3,600.00 |
| 02/19/2026 | Janielle Lattimore | Assistant Managing Clerk | Docket administrative sealing motion papers | 13 | 0.25 | \$475 | \$118.75 |
| 02/19/2026 | Jared Hoffman | Senior Staff Attorney | Draft dep kit primer for staff attorney team | 10 | 1.50 | \$525 | \$787.50 |
| 02/19/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant document productions | 09 | 6.50 | \$525 | \$3,412.50 |
| 02/19/2026 | Juan Lossada | Senior Staff Attorney | Continue review of privilege log entries for deficiencies (259 - 628) | 09 | 9.50 | \$525 | \$4,987.50 |
| 02/19/2026 | Juan Lossada | Senior Staff Attorney | Review and modify my depo kit guidelines and compare with Jared Hoffman's depo kit guidelines. | 10 | 0.50 | \$525 | \$262.50 |
| 02/19/2026 | Katherine Sinderson | Partner | Prep for class cert hearing | 07 | 3.00 | \$1,600 | \$4,800.00 |
| 02/19/2026 | Paul Charlotin | Litigation Support | Add/Modified requested Layout(s), View(s), Field (s), &/or Tag(s)/Choices(s) per Alex's request; Provided requested saved searches per Alec request (confirmed the documents in the provided priv log were not part of the recorded overlays from Defendant) | 09 | 1.50 | \$475 | \$712.50 |
| 02/19/2026 | Randall Hirsch | Staff Attorney | Privilege Log project | 09 | 3.25 | \$475 | \$1,543.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 02/19/2026 | Thomas Sperber | Associate | Legal research re defs' privilege claims over clawback documents; draft response letter re: clawback and demand for doj productions; investigate issue with docs listed in defs' priv log for which no redactions made; review documents listed on defs' priv log but for which no redactions were made; draft email re: docs with missing redactions | 09 | 8.00 | \$875 | \$7,000.00 |
| 02/19/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded Acevedo custodial documents from Defendants' fourth production; researched requested research topics | 09 | 6.75 | \$525 | \$3,543.75 |
| 02/19/2026 | Young Lee | Senior Staff Attorney | Reviewed depo kit memos from J. Hoffman and J. Lossada for discussion at depo kit meeting | 10 | 1.75 | \$525 | \$918.75 |
| 02/20/2026 | Abygail Krita | Associate | Research privilege challenges.. | 09 | 4.00 | \$650 | \$2,600.00 |
| 02/20/2026 | Abygail Krita | Associate | Discuss and draft email concerning deponent availability. | 10 | 0.75 | \$650 | \$487.50 |
| 02/20/2026 | Alec Coquin | Senior Counsel | Coordinated deposition scheduling. | 10 | 0.50 | \$1,100 | \$550.00 |
| 02/20/2026 | Alec Coquin | Senior Counsel | Review and analysis of class cert briefing re drafted oral argument prep questions | 07 | 1.50 | \$1,100 | \$1,650.00 |
| 02/20/2026 | Daniel Ackeret | Staff Attorney | Search and build folder for requested research topics; review team meeting | 09 | 5.00 | \$450 | \$2,250.00 |
| 02/20/2026 | Jared Hoffman | Senior Staff Attorney | Team conference calls to discuss dep prep | 10 | 1.00 | \$525 | \$525.00 |
| 02/20/2026 | Jared Hoffman | Senior Staff Attorney | Create and revise dep prep saved searches on Relativity | 10 | 0.50 | \$525 | \$262.50 |
| 02/20/2026 | Jared Hoffman | Senior Staff Attorney | Review and code defendant document productions | 09 | 6.50 | \$525 | \$3,412.50 |
| 02/20/2026 | Juan Lossada | Senior Staff Attorney | Continue review of defendants' privilege log for deficiencies (628-932) (8 hrs); attend review team meeting with all staff attorneys (0.25 hrs). | 09 | 8.25 | \$525 | \$4,331.25 |
| 02/20/2026 | Juan Lossada | Senior Staff Attorney | Attend depo kit preparation meeting with Jared Hoffman and Young Lee | 10 | 0.25 | \$525 | \$131.25 |
| 02/20/2026 | Katherine Sinderson | Partner | Prep for class cert hearing | 07 | 2.00 | \$1,600 | \$3,200.00 |
| 02/20/2026 | Paul Charlotin | Litigation Support | Add/Modified requested Layout(s), View(s), Field (s), &/or Tag(s)/Choices(s) per Juan's request | 09 | 0.25 | \$475 | \$118.75 |
| 02/20/2026 | Randall Hirsch | Staff Attorney | Privilege Log project | 09 | 5.00 | \$475 | \$2,375.00 |
| 02/20/2026 | Randall Hirsch | Staff Attorney | Team Meeting | 09 | 0.25 | \$475 | \$118.75 |
| 02/20/2026 | Thomas Sperber | Associate | Draft mock oral argument questions and answers for K. Sinderson oral argument prep; | 07 | 2.75 | \$875 | \$2,406.25 |
| 02/20/2026 | Thomas Sperber | Associate | Put together material on deposition targets; meeting to discuss deposition targets | 10 | 2.50 | \$875 | \$2,187.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 02/20/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded Shaw custodial docs from Defs' 4th production; conducted online research re deponent Lauren Steg; discussion with J. Hoffman & J. Lossada and Lit Support re changes to coding panel and Relativity Active Learning review; reviewed and coded Steg custodial docs; reviewed and coded batched top priority Steg docs | 09 | 4.25 | \$525 | \$2,231.25 |
| 02/20/2026 | Young Lee | Senior Staff Attorney | Reviewed dep kit panel and searches in prep for dep kit meeting; mtg w/ J. Hoffman and J. Lossada to discuss strategy for dep kit prep; attended review team mtg with J. Lossada to discuss division of dep kit work. | 10 | 3.00 | \$525 | \$1,575.00 |
| 02/21/2026 | Juan Lossada | Senior Staff Attorney | Continue review of defendants' privilege log for deficiencies (933-1399) | 09 | 5.00 | \$525 | \$2,625.00 |
| 02/21/2026 | Randall Hirsch | Staff Attorney | Privilege Log project | 09 | 2.25 | \$475 | \$1,068.75 |
| 02/21/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded RAL-ranked Steg documents | 09 | 2.25 | \$525 | \$1,181.25 |
| 02/22/2026 | Abygail Kritta | Associate | Draft mediation statement. | 12 | 1.50 | \$650 | \$975.00 |
| 02/22/2026 | Daniel Ackeret | Staff Attorney | Search and build folder for requested research projects | 09 | 3.00 | \$450 | \$1,350.00 |
| 02/22/2026 | Juan Lossada | Senior Staff Attorney | Continue review of defendants' privilege log for deficiencies (1591-1690) | 09 | 1.00 | \$525 | \$525.00 |
| 02/22/2026 | Thomas Sperber | Associate | Work on oral argument prep material | 07 | 1.50 | \$875 | \$1,312.50 |
| 02/22/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded RAL-ranked Steg documents; compiled list of mtgs/reports for Steg | 09 | 5.25 | \$525 | \$2,756.25 |
| 02/23/2026 | Abygail Kritta | Associate | Research for privilege challenges; draft privilege log dispute letter; prepare for and lead meet and confer. | 09 | 6.50 | \$650 | \$4,225.00 |
| 02/23/2026 | Alec Coquin | Senior Counsel | Meet and confer re plaintiff's privilege log dispute | 09 | 0.50 | \$1,100 | \$550.00 |
| 02/23/2026 | Cindy Bomzer-Stein | Case Manager | Prepare binders regarding motion for class certification motion hearing | 07 | 4.00 | \$450 | \$1,800.00 |
| 02/23/2026 | Daniel Ackeret | Staff Attorney | Search and build folder for requested research projects | 09 | 12.00 | \$450 | \$5,400.00 |
| 02/23/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 8.00 | \$525 | \$4,200.00 |
| 02/23/2026 | Juan Lossada | Senior Staff Attorney | Review former iRhythm employee custodial documents, emails, email and custodial documents uncoded, and email and custodial documents uncoded (with families). | 09 | 3.75 | \$525 | \$1,968.75 |
| 02/23/2026 | Katherine Sinderson | Partner | Prep for class cert hearing | 07 | 3.00 | \$1,600 | \$4,800.00 |
| 02/23/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for Steg depo | 10 | 5.00 | \$475 | \$2,375.00 |
| 02/23/2026 | Roberto Santamarina | Litigation Support | Download, organize, extract, edit, and load of 3rd party prod NDA_Partners_001 into relativity. Perform load quality control, update index, run scripts, and release. | 09 | 1.00 | \$525 | \$525.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 02/23/2026 | Thomas Sperber | Associate | M&C with defendants re: priv log disputes and DOJ communications request; discuss strategy pursuing disputes with team; work on chart for oral argument prep | 09 | 4.00 | \$875 | \$3,500.00 |
| 02/23/2026 | Young Lee | Senior Staff Attorney | Reviewed and coded RAL-batched Steg documents | 09 | 1.50 | \$525 | \$787.50 |
| 02/23/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled monthly quality reports for Steg Dep Kit | 10 | 5.50 | \$525 | \$2,887.50 |
| 02/23/2026 | Young Lee | Senior Staff Attorney | Set up searches for key terms and report types related to Steg | 10 | 2.00 | \$525 | \$1,050.00 |
| 02/24/2026 | Abygail Krita | Associate | Review privilege log annotated appendix. | 09 | 3.25 | \$650 | \$2,112.50 |
| 02/24/2026 | Alec Coquin | Senior Counsel | Oral argument prep | 07 | 3.00 | \$1,100 | \$3,300.00 |
| 02/24/2026 | Daniel Ackeret | Staff Attorney | Prepared for Hot Docs meeting; worked on building the executive level FDA update meeting list | 09 | 5.25 | \$450 | \$2,362.50 |
| 02/24/2026 | Daniel Ackeret | Staff Attorney | Search and build folder for requested research projects | 09 | 7.00 | \$450 | \$3,150.00 |
| 02/24/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 8.00 | \$525 | \$4,200.00 |
| 02/24/2026 | Juan Lossada | Senior Staff Attorney | Meeting with Abby Krita regarding former iRhythm employee depo kit | 10 | 0.25 | \$525 | \$131.25 |
| 02/24/2026 | Juan Lossada | Senior Staff Attorney | Update hot docs submission spreadsheet and format pdf submissions (0.5 hrs); review Defendants' privilege log re entries checked as no redactions (1 hr) | 09 | 1.50 | \$525 | \$787.50 |
| 02/24/2026 | Katherine Sinderson | Partner | Prep for class cert hearing | 07 | 1.75 | \$1,600 | \$2,800.00 |
| 02/24/2026 | Mahiri Buffong | Managing Clerk | Reviewed document for filing compliance, filed document and calendared events. | 13 | 1.75 | \$500 | \$875.00 |
| 02/24/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for Steg depo | 10 | 6.25 | \$475 | \$2,968.75 |
| 02/24/2026 | Thomas Sperber | Associate | Work with team on docs identified missing redactions included on defs' priv log | 09 | 2.00 | \$875 | \$1,750.00 |
| 02/24/2026 | Thomas Sperber | Associate | Coordinate with team on prep for upcoming oral argument | 07 | 1.00 | \$875 | \$875.00 |
| 02/24/2026 | Young Lee | Senior Staff Attorney | Reviewed MDR meeting documents for inclusion in Steg dep kit | 10 | 1.00 | \$525 | \$525.00 |
| 02/24/2026 | Young Lee | Senior Staff Attorney | Reviewed QC monthly reports for inclusion into Steg dep kit | 10 | 6.50 | \$525 | \$3,412.50 |
| 02/24/2026 | Young Lee | Senior Staff Attorney | Summarized and submitted Hot Docs for weekly meeting | 09 | 0.50 | \$525 | \$262.50 |
| 02/25/2026 | Abygail Krita | Associate | Draft mediation statement | 12 | 1.00 | \$650 | \$650.00 |
| 02/25/2026 | Abygail Krita | Associate | Draft privilege log dispute letter; attend team calls. | 09 | 1.00 | \$650 | \$650.00 |
| 02/25/2026 | Abygail Krita | Associate | Prepare for class certification hearing. | 07 | 1.00 | \$650 | \$650.00 |
| 02/25/2026 | Abygail Krita | Associate | Prepare for former iRhythm employee deposition. | 10 | 1.00 | \$650 | \$650.00 |
| 02/25/2026 | Alec Coquin | Senior Counsel | Hot docs and weekly strategy meetings | 09 | 1.25 | \$1,100 | \$1,375.00 |
| 02/25/2026 | Alec Coquin | Senior Counsel | Deponent review and follow-up searches re same | 10 | 2.75 | \$1,100 | \$3,025.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 02/25/2026 | Cindy Bomzer-Stein | Case Manager | Organize binders for printing for K. Sinderson | 07 | 0.25 | \$450 | \$112.50 |
| 02/25/2026 | Cindy Bomzer-Stein | Case Manager | Draft pro hac vice application for A. Coquin | 13 | 0.75 | \$450 | \$337.50 |
| 02/25/2026 | Daniel Ackeret | Staff Attorney | Started working on the Relativity Active Learning batches; hot docs meeting | 09 | 5.50 | \$450 | \$2,475.00 |
| 02/25/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 4.00 | \$525 | \$2,100.00 |
| 02/25/2026 | Jared Hoffman | Senior Staff Attorney | Compile Marcela Acevedo dep kit | 10 | 3.00 | \$525 | \$1,575.00 |
| 02/25/2026 | Jared Hoffman | Senior Staff Attorney | Weekly team hot docs meeting | 09 | 1.00 | \$525 | \$525.00 |
| 02/25/2026 | Juan Lossada | Senior Staff Attorney | Prepare former iRhythm employee highlighted set of documents (2.5 hrs); obtain her LinkedIn profile (0.25 hrs); update index (0.5); run internet searches on former iRhythm employee for negative articles (1 hr); review interview memo for former employee and extract statements from SAC for addition to depo kit (1.5 hrs); prepare preliminary depo outline (2.75 hrs) | 10 | 8.50 | \$525 | \$4,462.50 |
| 02/25/2026 | Juan Lossada | Senior Staff Attorney | Attend hot docs meeting | 09 | 1.00 | \$525 | \$525.00 |
| 02/25/2026 | Katherine Sinderson | Partner | Prep for class cert hearing | 07 | 8.75 | \$1,600 | \$14,000.00 |
| 02/25/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for O'Leary depo | 10 | 2.75 | \$475 | \$1,306.25 |
| 02/25/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for Steg depo | 10 | 2.75 | \$475 | \$1,306.25 |
| 02/25/2026 | Randall Hirsch | Staff Attorney | Hot doc meeting | 09 | 1.00 | \$475 | \$475.00 |
| 02/25/2026 | Thomas Sperber | Associate | Work on mediation statement. | 12 | 2.75 | \$875 | \$2,406.25 |
| 02/25/2026 | Thomas Sperber | Associate | Hot docs call and weekly team meeting. | 09 | 1.00 | \$875 | \$875.00 |
| 02/25/2026 | Thomas Sperber | Associate | Assist with oral argument prep | 07 | 2.00 | \$875 | \$1,750.00 |
| 02/25/2026 | Young Lee | Senior Staff Attorney | Attended and presented hot docs at weekly meeting w/J. Lossada | 09 | 0.75 | \$525 | \$393.75 |
| 02/25/2026 | Young Lee | Senior Staff Attorney | Discussed deposition schedule and related projects w/J. Lossada and J. Hoffman | 10 | 0.25 | \$525 | \$131.25 |
| 02/25/2026 | Young Lee | Senior Staff Attorney | Follow-up research on requested research project | 09 | 0.75 | \$525 | \$393.75 |
| 02/25/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled Hot/Highly Relevant docs for O'Leary Dep Kit | 10 | 3.25 | \$525 | \$1,706.25 |
| 02/25/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled quarterly reports received by Steg for dep kit | 10 | 3.50 | \$525 | \$1,837.50 |
| 02/26/2026 | Abygail Krita | Associate | Attend and prepare for class certification hearing. | 07 | 3.50 | \$650 | \$2,275.00 |
| 02/26/2026 | Abygail Krita | Associate | Draft mediation statement. | 12 | 0.50 | \$650 | \$325.00 |
| 02/26/2026 | Abygail Krita | Associate | Privilege log dispute letter. | 09 | 0.50 | \$650 | \$325.00 |
| 02/26/2026 | Alec Coquin | Senior Counsel | Prepared for and attended oral argument | 07 | 4.00 | \$1,100 | \$4,400.00 |
| 02/26/2026 | Cindy Bomzer-Stein | Case Manager | Search for corrective disclosures in record regarding hearing | 07 | 0.75 | \$450 | \$337.50 |
| 02/26/2026 | Daniel Ackeret | Staff Attorney | Started working on the Acevedo Relativity Active Learning batches | 09 | 5.00 | \$450 | \$2,250.00 |
| 02/26/2026 | Jared Hoffman | Senior Staff Attorney | Compile Marcela Acevedo dep kit | 10 | 8.00 | \$525 | \$4,200.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|-------------|
| 02/26/2026 | Juan Lossada | Senior Staff Attorney | Start review of Relativity Active Learning batches for depo kit inclusion | 10 | 3.75 | \$525 | \$1,968.75 |
| 02/26/2026 | Katherine Sinderson | Partner | Prep for class cert hearing, hearing, discussion | 07 | 8.75 | \$1,600 | \$14,000.00 |
| 02/26/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for O'Leary depo | 10 | 6.50 | \$475 | \$3,087.50 |
| 02/26/2026 | Thomas Sperber | Associate | Prepare final preparation materials for K. Sinderson re: oral argument on class certification motion; attend oral argument on class certification | 07 | 4.50 | \$875 | \$3,937.50 |
| 02/26/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled Hot/Highly Responsive docs for O'Leary Dep Kit | 10 | 8.00 | \$525 | \$4,200.00 |
| 02/27/2026 | Abygail Krita | Associate | Draft mediation statement. | 12 | 1.25 | \$650 | \$812.50 |
| 02/27/2026 | Abygail Krita | Associate | Draft privilege log dispute letter; review documents. | 09 | 1.25 | \$650 | \$812.50 |
| 02/27/2026 | Alec Coquin | Senior Counsel | Drafted mediation statement | 12 | 3.00 | \$1,100 | \$3,300.00 |
| 02/27/2026 | Cindy Bomzer-Stein | Case Manager | Draft transcript request form regarding oral argument | 13 | 0.25 | \$450 | \$112.50 |
| 02/27/2026 | Cindy Bomzer-Stein | Case Manager | Revise PHV application regarding A. Coquin | 13 | 0.25 | \$450 | \$112.50 |
| 02/27/2026 | Daniel Ackeret | Staff Attorney | Worked on the Acevedo Relativity Active Learning batches; review team meeting | 09 | 5.25 | \$450 | \$2,362.50 |
| 02/27/2026 | Jared Hoffman | Senior Staff Attorney | Weekly review team meeting | 09 | 0.50 | \$525 | \$262.50 |
| 02/27/2026 | Jared Hoffman | Senior Staff Attorney | Research dates when max transmission limits increased from 300 to 400 to 500 | 09 | 1.50 | \$525 | \$787.50 |
| 02/27/2026 | Jared Hoffman | Senior Staff Attorney | Compile Marcela Acevedo dep kit | 10 | 5.50 | \$525 | \$2,887.50 |
| 02/27/2026 | Julio Velazquez | Litigation Support | Conferred with Jared Hoffman re: populating "BLBGDate_BegDoc_BegAttach" field to export PDF documents; isolated documents and applied custom formatting to populate "BLBGDate_BegDoc_BegAttach" field; conducted QC to confirm accuracy; notified Jared Hoffman that "BLBGDate_BegDoc_BegAttach" field has been populated as requested | 09 | 1.25 | \$475 | \$593.75 |
| 02/27/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for O'Leary depo | 10 | 2.25 | \$475 | \$1,068.75 |
| 02/27/2026 | Randall Hirsch | Staff Attorney | Team Meeting | 09 | 0.50 | \$475 | \$237.50 |
| 02/27/2026 | Thomas Sperber | Associate | Work on mediation statement | 12 | 6.00 | \$875 | \$5,250.00 |
| 02/27/2026 | Young Lee | Senior Staff Attorney | Attended weekly Review Team meeting with J. Hoffman | 09 | 0.50 | \$525 | \$262.50 |
| 02/27/2026 | Young Lee | Senior Staff Attorney | Researched and collected marketing materials for inclusion in O'Leary dep kit | 10 | 0.50 | \$525 | \$262.50 |
| 02/27/2026 | Young Lee | Senior Staff Attorney | Researched dates of max transmission limit changes for A. Coquin | 09 | 0.75 | \$525 | \$393.75 |
| 02/27/2026 | Young Lee | Senior Staff Attorney | Researched marketing materials for inclusion in O'Leary dep kit | 10 | 4.25 | \$525 | \$2,231.25 |
| 02/28/2026 | Abygail Krita | Associate | Draft privilege log dispute letter | 09 | 4.50 | \$650 | \$2,925.00 |
| 02/28/2026 | Juan Lossada | Senior Staff Attorney | Factual research and pdf documents in document database regarding research topics from attorneys. | 09 | 2.25 | \$525 | \$1,181.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|-----------------------|---|-----------|-------|-------|------------|
| 03/01/2026 | Abygail Krita | Associate | Draft privilege log dispute letter. | 08 | 1.00 | \$650 | \$650.00 |
| 03/02/2026 | Abygail Krita | Associate | Draft mediation statement. | 12 | 1.75 | \$650 | \$1,137.50 |
| 03/02/2026 | Abygail Krita | Associate | Draft privilege log dispute letter; correspond with team re same. | 09 | 1.50 | \$650 | \$975.00 |
| 03/02/2026 | Daniel Ackeret | Staff Attorney | Mediation statement citations | 12 | 2.00 | \$450 | \$900.00 |
| 03/02/2026 | Daniel Ackeret | Staff Attorney | Worked on the Acevedo Relativity Active Learning batches | 09 | 4.50 | \$450 | \$2,025.00 |
| 03/02/2026 | Daniel Ackeret | Staff Attorney | Mediation statement citations | 12 | 1.50 | \$450 | \$675.00 |
| 03/02/2026 | Jared Hoffman | Senior Staff Attorney | Compile Marcela Acevedo dep kit | 10 | 4.50 | \$525 | \$2,362.50 |
| 03/02/2026 | Jared Hoffman | Senior Staff Attorney | Search for documentary evidence to include in Mediation Statement | 12 | 4.50 | \$525 | \$2,362.50 |
| 03/02/2026 | Juan Lossada | Senior Staff Attorney | Continue review of Relativity Active Learning batches for depo kit inclusion | 09 | 2.50 | \$525 | \$1,312.50 |
| 03/02/2026 | Juan Lossada | Senior Staff Attorney | Organize team searches and search for record cites in section IV.A of the mediation statement (including pdf'ing of supportive documents located) (6 hrs); search for record cites in section II.C of the mediation statement (including pdf'ing of supportive documents located) (1.5 hrs) | 12 | 7.50 | \$525 | \$3,937.50 |
| 03/02/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and motions, docketed documents and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 03/02/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for Acevedo dep | 10 | 1.50 | \$475 | \$712.50 |
| 03/02/2026 | Randall Hirsch | Staff Attorney | Mediation Statement cite checking project | 12 | 3.75 | \$475 | \$1,781.25 |
| 03/02/2026 | Thomas Sperber | Associate | Complete and circulate draft mediation statement to K. Sinderson for review | 12 | 7.00 | \$875 | \$6,125.00 |
| 03/02/2026 | Young Lee | Senior Staff Attorney | Researched sources in support of Mediation Statement | 12 | 2.25 | \$525 | \$1,181.25 |
| 03/02/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled documents for O'Leary Dep Kit | 10 | 4.25 | \$525 | \$2,231.25 |
| 03/03/2026 | Abygail Krita | Associate | Draft privilege log dispute letter; draft correspondence to defendants. | 09 | 4.25 | \$650 | \$2,762.50 |
| 03/03/2026 | Cindy Bomzer-Stein | Case Manager | Prepare for filing pro hac vice application for A. Coquin | 13 | 0.50 | \$450 | \$225.00 |
| 03/03/2026 | Cindy Bomzer-Stein | Case Manager | Prepare for filing transcript order form regarding class certification hearing | 13 | 0.50 | \$450 | \$225.00 |
| 03/03/2026 | Daniel Ackeret | Staff Attorney | Worked on the Acevedo Relativity Active Learning batches | 09 | 3.50 | \$450 | \$1,575.00 |
| 03/03/2026 | Daniel Ackeret | Staff Attorney | Mediation statement citations | 12 | 3.50 | \$450 | \$1,575.00 |
| 03/03/2026 | Jared Hoffman | Senior Staff Attorney | Compile Acevedo dep kit | 10 | 4.50 | \$525 | \$2,362.50 |
| 03/03/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 3.50 | \$525 | \$1,837.50 |
| 03/03/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 03/03/2026 | Juan Lossada | Senior Staff Attorney | Complete review of Relativity Active Learning batches for depo kit inclusion (3.5 hrs); run chat searches and code for depo kit inclusion (0.5 hrs); update depo calendar and meet with Jared Hoffman and Young Lee regarding changes to depo dates (0.5 hrs); start review of hot and highly relevant tagged docs for depo kit inclusion (3.5 hrs) | 10 | 8.00 | \$525 | \$4,200.00 |
| 03/03/2026 | Juan Lossada | Senior Staff Attorney | Search for hot documents tagged since 2/25, provide descriptions, and send to Tom Sperber (0.25 hrs); review hot doc submissions, update submissions spreadsheet, and circulate docs and spreadsheet with hot doc descriptions (0.25 hrs) | 09 | 0.50 | \$525 | \$262.50 |
| 03/03/2026 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance, filed and docketed documents. | 13 | 1.75 | \$500 | \$875.00 |
| 03/03/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for Acevedo dep | 10 | 2.75 | \$475 | \$1,306.25 |
| 03/03/2026 | Randall Hirsch | Staff Attorney | Work on research project | 09 | 1.50 | \$475 | \$712.50 |
| 03/03/2026 | Thomas Sperber | Associate | Draft, revise, and send email to defendants re discovery dispute; work with review team on hot doc analysis; circulate material relevant to DOJ investigation to L. Yu and discuss impact of investigation | 09 | 2.00 | \$875 | \$1,750.00 |
| 03/03/2026 | Young Lee | Senior Staff Attorney | Meeting w/J. Hoffman and J. Lossada to discuss deposition schedule priorities | 10 | 0.25 | \$525 | \$131.25 |
| 03/03/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled documents for O'Leary dep kit and generated rough index. | 10 | 7.75 | \$525 | \$4,068.75 |
| 03/04/2026 | Abygail Kritta | Associate | Draft privilege log dispute letter and annotated privilege log. | 09 | 5.75 | \$650 | \$3,737.50 |
| 03/04/2026 | Alec Coquin | Senior Counsel | Deponent review re deposition selection | 10 | 3.00 | \$1,100 | \$3,300.00 |
| 03/04/2026 | Cindy Bomzer-Stein | Case Manager | Revise privilege log format for A. Kritta | 09 | 0.50 | \$450 | \$225.00 |
| 03/04/2026 | Daniel Ackeret | Staff Attorney | Worked on the Shaw Relativity Active Learning batches | 09 | 7.75 | \$450 | \$3,487.50 |
| 03/04/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 8.00 | \$525 | \$4,200.00 |
| 03/04/2026 | John Rizio-Hamilton | Partner | Analysis of discovery | 08 | 1.00 | \$1,800 | \$1,800.00 |
| 03/04/2026 | Juan Lossada | Senior Staff Attorney | Complete review of hot and highly relevant documents of witness for depo kit inclusion (3.5 hrs); start culling of "maybe" documents for depo kit inclusion (3.5 hrs); run searches for chat documents (0.5 hrs); search for and provide depo kit memo examples to Jared Hoffman and Young Lee (0.25 hrs); draft email with examples regarding value of depo kit and circulate to Alec Coquin, Tom Sperber, and Abby Kritta (0.75 hrs) | 10 | 8.50 | \$525 | \$4,462.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 03/04/2026 | Juan Lossada | Senior Staff Attorney | Review additional hot doc submissions, update submissions spreadsheets, and circulate updated package to team (0.5 hrs); meeting with Abby Krita regarding privilege log notations (0.25 hrs). | 09 | 0.75 | \$525 | \$393.75 |
| 03/04/2026 | Julio Velazquez | Litigation Support | Conferred with Cindy Bomzer-Stein re: scrubbing metadata from Excel file; scrubbed metadata from Privilege Log & sent updated version to Cindy Bomzer-Stein via ticketing system as requested | 09 | 0.25 | \$475 | \$118.75 |
| 03/04/2026 | Katherine Sinderson | Partner | Discovery correspondence with defense counsel and internal team communications regarding document production schedule | 08 | 1.75 | \$1,600 | \$2,800.00 |
| 03/04/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded documents for Shaw dep | 10 | 6.75 | \$475 | \$3,206.25 |
| 03/04/2026 | Thomas Sperber | Associate | Draft email response to defendants re discovery dispute; draft and circulate detailed outline of plaintiff's portion of joint statement re discovery dispute; weekly team meeting | 08 | 4.50 | \$875 | \$3,937.50 |
| 03/04/2026 | Young Lee | Senior Staff Attorney | Reviewed potential exhibits and edited draft O'Leary depkit index | 10 | 7.25 | \$525 | \$3,806.25 |
| 03/05/2026 | Abygail Krita | Associate | Attend hot docs call. | 09 | 1.00 | \$650 | \$650.00 |
| 03/05/2026 | Alec Coquin | Senior Counsel | Hot docs call. | 09 | 1.00 | \$1,100 | \$1,100.00 |
| 03/05/2026 | Alec Coquin | Senior Counsel | Review defendant's documents to identify potential deposition witnesses and analyze relevance to case theories | 10 | 3.75 | \$1,100 | \$4,125.00 |
| 03/05/2026 | Daniel Akeret | Staff Attorney | Worked on the Shaw Relativity Active Learning batches; hot docs meeting | 09 | 6.50 | \$450 | \$2,925.00 |
| 03/05/2026 | Jared Hoffman | Senior Staff Attorney | Weekly hot docs meeting | 09 | 0.50 | \$525 | \$262.50 |
| 03/05/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 7.50 | \$525 | \$3,937.50 |
| 03/05/2026 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |
| 03/05/2026 | John Rizio-Hamilton | Partner | Discovery analysis | 08 | 1.50 | \$1,800 | \$2,700.00 |
| 03/05/2026 | Juan Lossada | Senior Staff Attorney | Locate alternative presentation hot documents for O'Leary depo kit (0.5 hrs); run analytics on Harveen Sethi hits and custodial documents (0.25 hrs); create saved search of emails from Harveen Sethi (0.25 hrs); compose email proposing alternative deponents (0.25 hrs); attend meeting with Jared Hoffman and Young Lee regarding depo kits status (0.25 hrs); attend meeting with Abby Krita regarding former iRhythm employee 'refresh recollection' documents (0.25 hrs); run searches for former iRhythm employee 'refresh recollection' documents re (1) time lag, (2) prioritizing queue reviews, (3) Zio At not an emergency service, and (4) creation of clean reports by removing artifacts (4.5 hrs). | 10 | 6.25 | \$525 | \$3,281.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 03/05/2026 | Juan Lossada | Senior Staff Attorney | Attend hot docs team meeting (1 hr); tag 'hot' and provide descriptions for 10 documents located by Alec Coquin (0.75 hrs). | 09 | 1.75 | \$525 | \$918.75 |
| 03/05/2026 | Randall Hirsch | Staff Attorney | Analyzed and coded documents for Shaw dep | 10 | 5.25 | \$475 | \$2,493.75 |
| 03/05/2026 | Randall Hirsch | Staff Attorney | Hot doc meeting | 09 | 1.00 | \$475 | \$475.00 |
| 03/05/2026 | Randall Hirsch | Staff Attorney | O'Leary depo index | 10 | 3.50 | \$475 | \$1,662.50 |
| 03/05/2026 | Thomas Sperber | Associate | Hot docs call. | 09 | 1.00 | \$875 | \$875.00 |
| 03/05/2026 | Thomas Sperber | Associate | Incorporate comments to joint letter re: discovery dispute and circulate revised draft | 08 | 4.00 | \$875 | \$3,500.00 |
| 03/05/2026 | Young Lee | Senior Staff Attorney | Edited draft O'Leary dep kit index and conferred with J. Hoffman and J. Lossada about inclusion of certain exhibits. | 10 | 3.25 | \$525 | \$1,706.25 |
| 03/05/2026 | Young Lee | Senior Staff Attorney | Drafted email with instructions on completing O'Leary dep kit index for R. Hirsch. | 10 | 0.50 | \$525 | \$262.50 |
| 03/05/2026 | Young Lee | Senior Staff Attorney | Attended weekly hot docs meeting with K. Sinderson | 09 | 0.75 | \$525 | \$393.75 |
| 03/05/2026 | Young Lee | Senior Staff Attorney | Attended meeting with J. Hoffman and J. Lossada to discuss upcoming deposition schedule | 10 | 0.25 | \$525 | \$131.25 |
| 03/05/2026 | Young Lee | Senior Staff Attorney | Drafted O'Leary deposition witness memo and sent to R. Hirsch for additional editing | 10 | 2.50 | \$525 | \$1,312.50 |
| 03/06/2026 | Abygail Kritta | Associate | Update LPs privilege log. | 09 | 1.00 | \$650 | \$650.00 |
| 03/06/2026 | Abygail Kritta | Associate | Draft outline for confidential witness deposition. | 10 | 1.00 | \$650 | \$650.00 |
| 03/06/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 7.50 | \$525 | \$3,937.50 |
| 03/06/2026 | Jessica Lacon | Docket Clerk | Review order, reconcile and docket | 13 | 0.25 | \$450 | \$112.50 |
| 03/06/2026 | Juan Lossada | Senior Staff Attorney | Continue former iRhythm employee 'refresh recollection' documents searches and collection. | 10 | 1.00 | \$525 | \$525.00 |
| 03/06/2026 | Juan Lossada | Senior Staff Attorney | Attend meeting with Abby Kritta regarding description changes to plaintiff's priv log (0.25 hrs); add older alternative priv descriptions to plaintiff's priv log and pdf 3 family groups with public pleading attachments that were filed (1.25 hrs). | 09 | 1.50 | \$525 | \$787.50 |
| 03/06/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: exporting native files to PDF; provided step-by-step documentation to same for exporting native documents in PDF form | 09 | 0.25 | \$475 | \$118.75 |
| 03/06/2026 | Katherine Sinderson | Partner | Joint discovery statement | 08 | 3.00 | \$1,600 | \$4,800.00 |
| 03/06/2026 | Randall Hirsch | Staff Attorney | O'Leary depo index | 10 | 8.25 | \$475 | \$3,918.75 |
| 03/06/2026 | Young Lee | Senior Staff Attorney | Attended weekly meeting with J. Lossada and review team to discuss ongoing projects | 09 | 0.25 | \$525 | \$131.25 |
| 03/06/2026 | Young Lee | Senior Staff Attorney | Corresponded with R. Hirsch regarding O'Leary dep kit index and potential exhibits | 10 | 0.25 | \$525 | \$131.25 |
| 03/06/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled documents for Steg dep kit. | 10 | 3.50 | \$525 | \$1,837.50 |
| 03/07/2026 | Katherine Sinderson | Partner | Mediation statement | 12 | 2.00 | \$1,600 | \$3,200.00 |
| 03/07/2026 | Katherine Sinderson | Partner | Joint discovery statement | 08 | 3.00 | \$1,600 | \$4,800.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 03/07/2026 | Randall Hirsch | Staff Attorney | O'Leary depo index | 10 | 6.50 | \$475 | \$3,087.50 |
| 03/07/2026 | Thomas Sperber | Associate | Research re: sanctions motion before Judge Corley | 14 | 1.25 | \$875 | \$1,093.75 |
| 03/07/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled hot/highly relevant documents for Steg dep kit | 10 | 2.50 | \$525 | \$1,312.50 |
| 03/08/2026 | Abygail Kritta | Associate | Draft CW outline. | 10 | 0.50 | \$650 | \$325.00 |
| 03/08/2026 | Abygail Kritta | Associate | Update LPs privilege log. | 09 | 0.50 | \$650 | \$325.00 |
| 03/08/2026 | Katherine Sinderson | Partner | Mediation statement | 12 | 3.00 | \$1,600 | \$4,800.00 |
| 03/08/2026 | Thomas Sperber | Associate | Work on our portion of joint letter re discovery dispute | 08 | 4.00 | \$875 | \$3,500.00 |
| 03/09/2026 | Abygail Kritta | Associate | Draft and prepare for former iRhythm employee deposition. | 10 | 6.00 | \$650 | \$3,900.00 |
| 03/09/2026 | Abygail Kritta | Associate | Review privilege log and potential clawbacks. | 09 | 3.00 | \$650 | \$1,950.00 |
| 03/09/2026 | Alec Coquin | Senior Counsel | Review defendant's documents to identify potential deposition witnesses and evaluate deponent selection criteria | 10 | 5.00 | \$1,100 | \$5,500.00 |
| 03/09/2026 | Cindy Bomzer-Stein | Case Manager | Draft notice of subpoena shell | 09 | 0.75 | \$450 | \$337.50 |
| 03/09/2026 | Cindy Bomzer-Stein | Case Manager | Draft subpoena shell | 09 | 0.75 | \$450 | \$337.50 |
| 03/09/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 8.00 | \$525 | \$4,200.00 |
| 03/09/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 03/09/2026 | Juan Lossada | Senior Staff Attorney | Provide Abby Kritta with link to client's production documents set for new production, review client's production documents, and apply necessary redactions (0.5 hrs); review third party new production documents and provide report re same (2.5 hrs). | 09 | 3.00 | \$525 | \$1,575.00 |
| 03/09/2026 | Katherine Sinderson | Partner | Joint discovery statement | 08 | 4.75 | \$1,600 | \$7,600.00 |
| 03/09/2026 | Katherine Sinderson | Partner | Privilege log revision | 09 | 4.00 | \$1,600 | \$6,400.00 |
| 03/09/2026 | Roberto Santamarina | Litigation Support | Download, organize, extract, edit, and load of 3rd party prods into relativity. Perform load quality control, update index, run scripts, and release. | 09 | 1.50 | \$525 | \$787.50 |
| 03/09/2026 | Roberto Santamarina | Litigation Support | Production of documents (LP_IRHYTHM_005). | 09 | 2.00 | \$525 | \$1,050.00 |
| 03/09/2026 | Thomas Sperber | Associate | Finalize and serve Defendants with portion of joint letter re: discovery dispute. | 08 | 6.50 | \$875 | \$5,687.50 |
| 03/09/2026 | Young Lee | Senior Staff Attorney | Corresponded w/R. Hirsch regarding tasks for O'Leary and Steg dep kits | 10 | 0.50 | \$525 | \$262.50 |
| 03/09/2026 | Young Lee | Senior Staff Attorney | Reviewed and culled hot/highly responsive documents and chat transcripts for inclusion in Steg dep kit | 10 | 7.50 | \$525 | \$3,937.50 |
| 03/10/2026 | Abygail Kritta | Associate | Prepare depo kit for former iRhythm employee | 10 | 0.50 | \$650 | \$325.00 |
| 03/10/2026 | Alec Coquin | Senior Counsel | Review defendant's documents and conduct analysis regarding lag time theory for deposition preparation and case strategy | 09 | 5.00 | \$1,100 | \$5,500.00 |
| 03/10/2026 | Cindy Bomzer-Stein | Case Manager | Organize binder regarding former iRhythm employee witness | 10 | 0.75 | \$450 | \$337.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-------------------------------------|---|-----------|-------|---------|-------------|
| 03/10/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit | 10 | 8.00 | \$525 | \$4,200.00 |
| 03/10/2026 | Juan Lossada | Senior Staff Attorney | Create all depo kit searches for defendants Patterson, Relia, and Sethi (1.5 hrs); request preparation of Relativity Active Learning batches by Litigation Support based on Patterson, Relia, and Sethi's emails and custodials uncoded with family searches (0.25 hrs); run additional searches related to former iRhythm employee and certain assertions (0.5 hrs); complete review of Patterson batch for inclusion in depo kit (2 hrs). | 10 | 4.25 | \$525 | \$2,231.25 |
| 03/10/2026 | Juan Lossada | Senior Staff Attorney | Assist with searches for certain information in data base (0.5 hrs); remind team to submit hot docs, collect doc submissions, update submissions spreadsheet and circulate to entire team (0.5 hrs). | 09 | 1.00 | \$525 | \$525.00 |
| 03/10/2026 | Katherine Sinderson | Partner | Mediation statement | 12 | 8.25 | \$1,600 | \$13,200.00 |
| 03/10/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docket document and calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 03/10/2026 | Thomas Sperber | Associate | Work on mediation statement | 12 | 1.50 | \$875 | \$1,312.50 |
| 03/10/2026 | Young Lee | Senior Staff Attorney | Culled Steg hot/highly relevant documents and generated draft dep kit index. | 10 | 2.75 | \$525 | \$1,443.75 |
| 03/10/2026 | Young Lee | Senior Staff Attorney | Corresponded w/R. Hirsch to discuss Steg dep kit index work and related questions. | 10 | 0.25 | \$525 | \$131.25 |
| 03/10/2026 | Young Lee | Senior Staff Attorney | Researched documents in response to K. Sinderson's query. | 09 | 0.25 | \$525 | \$131.25 |
| 03/10/2026 | Young Lee | Senior Staff Attorney | Highlighted and compiled hot docs, prepared summaries and submitted for Hot Docs meeting. | 09 | 0.75 | \$525 | \$393.75 |
| 03/10/2026 | Young Lee | Senior Staff Attorney | Edited deposition topics and key documents for O'Leary deposition witness memo | 10 | 1.75 | \$525 | \$918.75 |
| 03/10/2026 | Young Lee | Senior Staff Attorney | Edited O'Leary dep kit index and researched supplemental exhibits. | 10 | 2.75 | \$525 | \$1,443.75 |
| 03/11/2026 | Abygail Kritt | Associate | Prepare for deposition of former employee. | 10 | 2.00 | \$650 | \$1,300.00 |
| 03/11/2026 | Alec Coquin | Senior Counsel | Review defendant's documents and conduct analysis regarding claims for deposition preparation | 09 | 6.00 | \$1,100 | \$6,600.00 |
| 03/11/2026 | Amy Bitkower | Managing Director of Investigations | Conference with attorneys regarding case strategy; online research regarding iRhythm FDA regulatory matters | 01 | 0.50 | \$650 | \$325.00 |
| 03/11/2026 | Cindy Bomzer-Stein | Case Manager | Revise and finalize letter to defendants regarding privilege logs | 09 | 0.50 | \$450 | \$225.00 |
| 03/11/2026 | Jared Hoffman | Senior Staff Attorney | Weekly team hot docs meeting | 09 | 0.50 | \$525 | \$262.50 |
| 03/11/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit and draft document index | 10 | 7.50 | \$525 | \$3,937.50 |
| 03/11/2026 | Jessica Lacon | Docket Clerk | Review email and Docket and Diary relevant dates and deadlines | 13 | 0.50 | \$450 | \$225.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 03/11/2026 | Juan Lossada | Senior Staff Attorney | Respond to Alec Coquin's request regarding defendants' failure to load slipsheet 'withheld for privilege' documents on their privilege log (0.25 hrs); perform research on certain topic in Defendants' documents for Abby Kritt (0.25 hrs); attend hot docs team meeting (0.5 hrs). | 09 | 1.00 | \$525 | \$525.00 |
| 03/11/2026 | Juan Lossada | Senior Staff Attorney | Request creation of Kiani depo kit tags by Lit Support, and set up Kiani depo kit folders and saved searches (1.25 hrs); complete review of Patterson hot and highly relevant docs for depo kit inclusion (1.5 hrs); start review of Patterson 'maybe' documents for inclusion in depo kit (3 hrs). | 10 | 5.75 | \$525 | \$3,018.75 |
| 03/11/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: Kiani review batches; isolated Kiani documents ranked 65% and above & created review batches as requested by Juan Lossada; notified same that Kiana review batches were created and available for review. | 09 | 0.50 | \$475 | \$237.50 |
| 03/11/2026 | Katherine Sinderson | Partner | Mediation statement | 12 | 7.00 | \$1,600 | \$11,200.00 |
| 03/11/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed document and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 03/11/2026 | Paul Charlotin | Litigation Support | Add/Modified requested Layout(s), View(s), Field (s), &/or Tag(s)/Choices(s) per Juan's request | 09 | 0.25 | \$475 | \$118.75 |
| 03/11/2026 | Thomas Sperber | Associate | Work on mediation statement draft | 12 | 2.00 | \$875 | \$1,750.00 |
| 03/11/2026 | Young Lee | Senior Staff Attorney | Attended weekly Hot Docs meeting with J. Lossada and presented documents. | 09 | 0.50 | \$525 | \$262.50 |
| 03/11/2026 | Young Lee | Senior Staff Attorney | Corresponded w/R. Hirsch regarding follow-up research for Steg dep kit. | 10 | 0.25 | \$525 | \$131.25 |
| 03/11/2026 | Young Lee | Senior Staff Attorney | Reviewed and edited O'Leary dep kit index and conducted follow-up research. | 10 | 8.50 | \$525 | \$4,462.50 |
| 03/12/2026 | Abygail Kritt | Associate | Draft mediation submission. | 12 | 4.50 | \$650 | \$2,925.00 |
| 03/12/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit and draft document index | 10 | 7.00 | \$525 | \$3,675.00 |
| 03/12/2026 | Juan Lossada | Senior Staff Attorney | Review all Patterson chat transcripts and July 31, 2024 Form 483 to the Patterson depo kit (1 hr); continue review of Kiani RAL batch for depo kit inclusion (5.5 hrs). | 10 | 6.50 | \$525 | \$3,412.50 |
| 03/12/2026 | Katherine Sinderson | Partner | Mediation statement | 12 | 7.75 | \$1,600 | \$12,400.00 |
| 03/12/2026 | Thomas Sperber | Associate | Work on mediation statement draft | 12 | 1.50 | \$875 | \$1,312.50 |
| 03/12/2026 | Young Lee | Senior Staff Attorney | Reviewed and edited O'Leary dep kit index and conducted follow-up research. | 10 | 8.25 | \$525 | \$4,331.25 |
| 03/13/2026 | Abygail Kritt | Associate | Draft mediation submission. | 12 | 1.50 | \$650 | \$975.00 |
| 03/13/2026 | Alec Coquin | Senior Counsel | Doc review and analysis | 09 | 4.00 | \$1,100 | \$4,400.00 |
| 03/13/2026 | Jared Hoffman | Senior Staff Attorney | Compile Shaw dep kit and draft document index | 10 | 6.50 | \$525 | \$3,412.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 03/13/2026 | Jared Hoffman | Senior Staff Attorney | Conference calls and other correspondence with staff attorney team re: dep kits | 10 | 0.75 | \$525 | \$393.75 |
| 03/13/2026 | Juan Lossada | Senior Staff Attorney | Prepare agenda and attend review team meeting | 09 | 0.50 | \$525 | \$262.50 |
| 03/13/2026 | Juan Lossada | Senior Staff Attorney | Review mediation statement and all exhibits listed in mediation statements, pull exhibits and check accuracy of cited language, and create pdfs for all replacement or alternate exhibit documents | 12 | 6.25 | \$525 | \$3,281.25 |
| 03/13/2026 | Katherine Sinderson | Partner | Mediation statement | 12 | 3.00 | \$1,600 | \$4,800.00 |
| 03/13/2026 | Young Lee | Senior Staff Attorney | Attended weekly Review Team meeting with J. Lossada | 09 | 0.25 | \$525 | \$131.25 |
| 03/13/2026 | Young Lee | Senior Staff Attorney | Reviewed and edited O'Leary dep kit index and conducted follow-up research to supplement kit. | 10 | 9.25 | \$525 | \$4,856.25 |
| 03/14/2026 | Juan Lossada | Senior Staff Attorney | Complete review of Chad Patterson 'maybe' documents for inclusion in depo kit (1 hr); complete review of Mazi Kiani Relativity Active Learning batches for inclusion in depo kit (1.25 hrs); start review of Mazi Kiani 'hot' and 'highly relevant' documents for inclusion in depo kit (1.75 hrs) | 10 | 4.00 | \$525 | \$2,100.00 |
| 03/14/2026 | Young Lee | Senior Staff Attorney | Edited and finalized O'Leary dep kit index and conducted follow-up research to supplement kit. | 10 | 7.50 | \$525 | \$3,937.50 |
| 03/15/2026 | Abygail Krita | Associate | Draft joint discovery letter. | 08 | 5.25 | \$650 | \$3,412.50 |
| 03/15/2026 | Juan Lossada | Senior Staff Attorney | Continue review of Mazi Kiani hot and 'highly relevant' docs for depo kit inclusion. | 10 | 3.25 | \$525 | \$1,706.25 |
| 03/15/2026 | Katherine Sinderson | Partner | Joint discovery statement | 08 | 3.75 | \$1,600 | \$6,000.00 |
| 03/15/2026 | Young Lee | Senior Staff Attorney | Edited and finalized O'Leary dep kit index and created PDFs of exhibits. | 10 | 9.50 | \$525 | \$4,987.50 |
| 03/16/2026 | Abygail Krita | Associate | Draft mediation statement. | 12 | 1.25 | \$650 | \$812.50 |
| 03/16/2026 | Abygail Krita | Associate | Finalize joint discovery statement. | 08 | 1.00 | \$650 | \$650.00 |
| 03/16/2026 | Alec Coquin | Senior Counsel | Researched and drafted mediation statement | 12 | 5.50 | \$1,100 | \$6,050.00 |
| 03/16/2026 | Cindy Bomzer-Stein | Case Manager | Revise exhibits for filing regarding joint letter regarding discovery dispute | 08 | 0.25 | \$450 | \$112.50 |
| 03/16/2026 | Cindy Bomzer-Stein | Case Manager | Cite check joint letter regarding discovery dispute | 08 | 2.50 | \$450 | \$1,125.00 |
| 03/16/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit. | 10 | 8.00 | \$450 | \$3,600.00 |
| 03/16/2026 | Jared Hoffman | Senior Staff Attorney | Compile Marcela Acevedo dep kit | 10 | 4.00 | \$525 | \$2,100.00 |
| 03/16/2026 | Juan Lossada | Senior Staff Attorney | Continue review of hot and 'highly relevant' Mazi Kiani documents for inclusion in depo kit; | 10 | 7.00 | \$525 | \$3,675.00 |
| 03/16/2026 | Juan Lossada | Senior Staff Attorney | Create pdfs of native exhibit documents with coversheets for mediation statement | 12 | 0.50 | \$525 | \$262.50 |
| 03/16/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: printing a document with metadata slip-sheet; created new PDF profile to print metadata sheet; notified Juan Lossada that printing of metadata sheet is available; conferred with Juan Lossada re: reviewer metrics | 09 | 0.50 | \$475 | \$237.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|--------------------------|---|-----------|-------|---------|------------|
| 03/16/2026 | Katherine Sinderson | Partner | Mediation statement | 12 | 5.75 | \$1,600 | \$9,200.00 |
| 03/16/2026 | Mahiri Buffong | Managing Clerk | Discussion with case manager re in camera procedures in the Northern District of California. Confirmed steps for submission. | 08 | 0.75 | \$500 | \$375.00 |
| 03/16/2026 | Randall Hirsch | Staff Attorney | Steg depo kit index | 10 | 7.50 | \$475 | \$3,562.50 |
| 03/16/2026 | Young Lee | Senior Staff Attorney | Call with R. Hirsch to discuss issues with Steg depkit index and next steps | 10 | 0.25 | \$525 | \$131.25 |
| 03/16/2026 | Young Lee | Senior Staff Attorney | Downloaded PDFs for Mediation Statement | 12 | 0.50 | \$525 | \$262.50 |
| 03/16/2026 | Young Lee | Senior Staff Attorney | Revised O'Leary Dep Kit index, highlighted exhibits and uploaded files for printing | 10 | 15.25 | \$525 | \$8,006.25 |
| 03/17/2026 | Abygail Kritta | Associate | Draft mediation statement and gather corresponding exhibits; draft correspondence to opposing counsel. | 12 | 1.25 | \$650 | \$812.50 |
| 03/17/2026 | Alec Coquin | Senior Counsel | Researched and drafted mediation statement | 12 | 7.50 | \$1,100 | \$8,250.00 |
| 03/17/2026 | Cindy Bomzer-Stein | Case Manager | Cite check mediation statement | 12 | 6.00 | \$450 | \$2,700.00 |
| 03/17/2026 | Cindy Bomzer-Stein | Case Manager | Finalize and prepare for filing joint letter regarding discovery dispute | 08 | 0.75 | \$450 | \$337.50 |
| 03/17/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve filings from related DOJ ninth circuit case | 13 | 0.25 | \$450 | \$112.50 |
| 03/17/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit. | 10 | 8.00 | \$450 | \$3,600.00 |
| 03/17/2026 | Janielle Lattimore | Assistant Managing Clerk | Revise diary for mediation statement deadline pursuant to case manager correspondence; Update electronic filing progress tracker per correspondence from case manager regarding joint letter filing | 13 | 0.50 | \$475 | \$237.50 |
| 03/17/2026 | Janielle Lattimore | Assistant Managing Clerk | Review judge's standing order and confirm filing procedure; electronic filing of Joint Discovery Letter Brief | 13 | 1.00 | \$475 | \$475.00 |
| 03/17/2026 | Jared Hoffman | Senior Staff Attorney | Research whether there was any conclusion reached about how the company ultimately marketed product | 09 | 6.00 | \$525 | \$3,150.00 |
| 03/17/2026 | Jared Hoffman | Senior Staff Attorney | Compile Marcela Acevedo dep kit | 10 | 2.00 | \$525 | \$1,050.00 |
| 03/17/2026 | Juan Lossada | Senior Staff Attorney | Continue review of Mazi Kiani hot and 'highly relevant' documents for depo kit inclusion | 10 | 7.25 | \$525 | \$3,806.25 |
| 03/17/2026 | Katherine Sinderson | Partner | Prep for deposition. | 10 | 3.00 | \$1,600 | \$4,800.00 |
| 03/17/2026 | Katherine Sinderson | Partner | Joint statement | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 03/17/2026 | Mahiri Buffong | Managing Clerk | Reviewed documents for filing compliance. | 13 | 0.75 | \$500 | \$375.00 |
| 03/17/2026 | Randall Hirsch | Staff Attorney | Steg depo kit index | 10 | 6.75 | \$475 | \$3,206.25 |
| 03/17/2026 | Young Lee | Senior Staff Attorney | Finalized O'Leary dep kit and sent to OS for printing | 10 | 0.75 | \$525 | \$393.75 |
| 03/18/2026 | Abygail Kritta | Associate | Draft mediation statement; gather exhibits. | 12 | 4.00 | \$650 | \$2,600.00 |
| 03/18/2026 | Abygail Kritta | Associate | Review documents for deposition prep. | 10 | 1.00 | \$650 | \$650.00 |
| 03/18/2026 | Abygail Kritta | Associate | Review documents for privilege disputes. | 09 | 1.00 | \$650 | \$650.00 |
| 03/18/2026 | Alec Coquin | Senior Counsel | Researched and drafted mediation statement | 12 | 6.00 | \$1,100 | \$6,600.00 |
| 03/18/2026 | Cindy Bomzer-Stein | Case Manager | Update exhibits regarding mediation statement | 12 | 1.50 | \$450 | \$675.00 |
| 03/18/2026 | Cindy Bomzer-Stein | Case Manager | Organize exhibits binder regarding mediation statement for K. Sinderson | 12 | 1.50 | \$450 | \$675.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|-------------|
| 03/18/2026 | Cindy Bomzer-Stein | Case Manager | Cite check mediation statement | 12 | 4.50 | \$450 | \$2,025.00 |
| 03/18/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit. | 10 | 10.00 | \$450 | \$4,500.00 |
| 03/18/2026 | Jessica Lacon | Docket Clerk | Review order, Reconcile and Docket | 13 | 0.25 | \$450 | \$112.50 |
| 03/18/2026 | Juan Lossada | Senior Staff Attorney | Continue review of Mazi Kiani hot and 'highly relevant' documents for potential inclusion in depo kit | 10 | 8.25 | \$525 | \$4,331.25 |
| 03/18/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 8.00 | \$1,600 | \$12,800.00 |
| 03/18/2026 | Randall Hirsch | Staff Attorney | Steg depo kit index/pdf | 10 | 8.00 | \$475 | \$3,800.00 |
| 03/18/2026 | Young Lee | Senior Staff Attorney | Reviewed and edited Steg dep kit index and suggested supplemental exhibits | 10 | 3.25 | \$525 | \$1,706.25 |
| 03/19/2026 | Abygail Krita | Associate | Draft and submit mediation statement. | 12 | 6.50 | \$650 | \$4,225.00 |
| 03/19/2026 | Alec Coquin | Senior Counsel | Drafted and served mediation statement | 12 | 7.00 | \$1,100 | \$7,700.00 |
| 03/19/2026 | Cindy Bomzer-Stein | Case Manager | Prepare exhibits for submission | 12 | 3.50 | \$450 | \$1,575.00 |
| 03/19/2026 | Cindy Bomzer-Stein | Case Manager | Revise meditation statement | 12 | 0.75 | \$450 | \$337.50 |
| 03/19/2026 | Cindy Bomzer-Stein | Case Manager | Revise exhibit list regarding mediation statement | 12 | 1.00 | \$450 | \$450.00 |
| 03/19/2026 | Cindy Bomzer-Stein | Case Manager | Draft index of joint exhibits binder regarding mediation statement | 12 | 1.75 | \$450 | \$787.50 |
| 03/19/2026 | Cindy Bomzer-Stein | Case Manager | Draft index regarding binder for mediation statement | 12 | 2.25 | \$450 | \$1,012.50 |
| 03/19/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit. | 10 | 8.00 | \$450 | \$3,600.00 |
| 03/19/2026 | Juan Lossada | Senior Staff Attorney | Complete review of Mazi Kiani hot and 'highly relevant' documents for inclusion in depo kit (4.5 hrs); locate additional documents on subject requested (for former iRhythm employee depo kit) and send to Abby Krita (0.25 hrs); start review of Mazi Kiani 'maybe' folder for inclusion of docs in depo kit (2.25 hrs) | 10 | 7.00 | \$525 | \$3,675.00 |
| 03/19/2026 | Juan Lossada | Senior Staff Attorney | Update hot doc submissions spreadsheet and folder for 3.25.2026 | 09 | 0.25 | \$525 | \$131.25 |
| 03/19/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 5.00 | \$1,600 | \$8,000.00 |
| 03/19/2026 | Katherine Sinderson | Partner | Review of mediation statements | 12 | 2.00 | \$1,600 | \$3,200.00 |
| 03/19/2026 | Randall Hirsch | Staff Attorney | Steg depo kit index/pdf | 10 | 8.25 | \$475 | \$3,918.75 |
| 03/19/2026 | Young Lee | Senior Staff Attorney | Discussed and provided instructions to R. Hirsch re printing and highlighting Steg dep kit | 10 | 0.25 | \$525 | \$131.25 |
| 03/20/2026 | Abygail Krita | Associate | Discuss mediation with team; prepare for mediation. | 12 | 2.25 | \$650 | \$1,462.50 |
| 03/20/2026 | Alec Coquin | Senior Counsel | Drafted mediation rebuttals and strategy call re same | 12 | 2.50 | \$1,100 | \$2,750.00 |
| 03/20/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit | 10 | 5.00 | \$450 | \$2,250.00 |
| 03/20/2026 | Daniel Ackeret | Staff Attorney | Review team meeting | 09 | 1.00 | \$450 | \$450.00 |
| 03/20/2026 | Juan Lossada | Senior Staff Attorney | Attend review team meeting. | 09 | 0.50 | \$525 | \$262.50 |
| 03/20/2026 | Juan Lossada | Senior Staff Attorney | Locate mediation exhibits for team to review for potential inclusion in depo kits (0.25 hrs); continue review of Mazi Kiani maybe documents for depo kit inclusion (8.25 hrs). | 10 | 8.50 | \$525 | \$4,462.50 |
| 03/20/2026 | Katherine Sinderson | Partner | Mediation prep and supplemental submission | 12 | 2.75 | \$1,600 | \$4,400.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 03/20/2026 | Randall Hirsch | Staff Attorney | Steg depo kit index/pdf | 10 | 0.50 | \$475 | \$237.50 |
| 03/20/2026 | Randall Hirsch | Staff Attorney | Team meeting | 09 | 0.50 | \$475 | \$237.50 |
| 03/20/2026 | Young Lee | Senior Staff Attorney | Corresponded w/R. Hirsch re Steg dep kit and additional research to supplement | 10 | 0.25 | \$525 | \$131.25 |
| 03/20/2026 | Young Lee | Senior Staff Attorney | Attended weekly review team meeting to discuss ongoing dep kits. | 10 | 0.25 | \$525 | \$131.25 |
| 03/20/2026 | Young Lee | Senior Staff Attorney | Attended weekly review team meeting to discuss mediation statement. | 12 | 0.25 | \$525 | \$131.25 |
| 03/21/2026 | Katherine Sinderson | Partner | Depo prep | 10 | 3.75 | \$1,600 | \$6,000.00 |
| 03/22/2026 | Juan Lossada | Senior Staff Attorney | Complete review of Mazi Kiani maybe documents for inclusion in depo kit. | 10 | 1.00 | \$525 | \$525.00 |
| 03/22/2026 | Juan Lossada | Senior Staff Attorney | Conduct research within Defendants' documents on topic requested by associate attorney | 09 | 2.75 | \$525 | \$1,443.75 |
| 03/23/2026 | Abygail Krita | Associate | Draft mediation submission. | 12 | 1.00 | \$650 | \$650.00 |
| 03/23/2026 | Alec Coquin | Senior Counsel | Priv challenge review and research re same | 09 | 2.50 | \$1,100 | \$2,750.00 |
| 03/23/2026 | Cindy Bomzer-Stein | Case Manager | Upload mediation statements and exhibits to Sharepoint and iManage | 12 | 0.75 | \$450 | \$337.50 |
| 03/23/2026 | Cindy Bomzer-Stein | Case Manager | Revise client memo regarding background information | 16 | 0.75 | \$450 | \$337.50 |
| 03/23/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit. | 10 | 10.00 | \$450 | \$4,500.00 |
| 03/23/2026 | Jared Hoffman | Senior Staff Attorney | Compile Marcela Acevedo dep kit | 10 | 4.00 | \$525 | \$2,100.00 |
| 03/23/2026 | John Rizio-Hamilton | Partner | Mediation prep | 12 | 2.00 | \$1,800 | \$3,600.00 |
| 03/23/2026 | Juan Lossada | Senior Staff Attorney | Start review of Mazi Kiani 'Depo In' documents and concurrent preparation of depo index | 10 | 8.00 | \$525 | \$4,200.00 |
| 03/23/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 3.00 | \$1,600 | \$4,800.00 |
| 03/23/2026 | Randall Hirsch | Staff Attorney | Analyzed and coded Sethi docs | 09 | 2.25 | \$475 | \$1,068.75 |
| 03/23/2026 | Young Lee | Senior Staff Attorney | Discussed with J. Lossada class period as reflected in motion to dismiss order and class certification briefs. | 14 | 0.25 | \$525 | \$131.25 |
| 03/24/2026 | Abygail Krita | Associate | Draft mediation submission. | 12 | 3.00 | \$650 | \$1,950.00 |
| 03/24/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit. | 10 | 9.75 | \$450 | \$4,387.50 |
| 03/24/2026 | Jared Hoffman | Senior Staff Attorney | Draft Marcela Acevedo dep kit index | 10 | 8.00 | \$525 | \$4,200.00 |
| 03/24/2026 | John Rizio-Hamilton | Partner | Mediation prep | 12 | 3.00 | \$1,800 | \$5,400.00 |
| 03/24/2026 | Juan Lossada | Senior Staff Attorney | Gather hot doc submissions, add to hot doc submissions spreadsheet, circulate pdfs and spreadsheet to entire team. | 09 | 0.50 | \$525 | \$262.50 |
| 03/24/2026 | Juan Lossada | Senior Staff Attorney | Continue to work on review of Mazi Kiani 'Depo In' documents and concurrent preparation of dep kit index. | 10 | 9.00 | \$525 | \$4,725.00 |
| 03/24/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 5.00 | \$1,600 | \$8,000.00 |
| 03/24/2026 | Paul Charlotin | Litigation Support | Downloaded, QC, & uploaded provided Defendant prod and overlay prod; Created requested Clawback saved searches and saving original for review | 09 | 2.75 | \$475 | \$1,306.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|-------------|
| 03/24/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded Sethi uncoded docs | 09 | 8.50 | \$475 | \$4,037.50 |
| 03/25/2026 | Abygail Kritta | Associate | Attend team calls; review clawback documents. | 09 | 1.25 | \$650 | \$812.50 |
| 03/25/2026 | Abygail Kritta | Associate | Prepare for O'Leary deposition. | 10 | 2.75 | \$650 | \$1,787.50 |
| 03/25/2026 | Alec Coquin | Senior Counsel | Hot docs call; team strategy call and follow-up re same | 09 | 2.25 | \$1,100 | \$2,475.00 |
| 03/25/2026 | Daniel Ackeret | Staff Attorney | Added descriptions for Jason Shaw's Dep kit | 10 | 8.00 | \$450 | \$3,600.00 |
| 03/25/2026 | Daniel Ackeret | Staff Attorney | Hot Docs Meeting | 09 | 1.00 | \$450 | \$450.00 |
| 03/25/2026 | Jared Hoffman | Senior Staff Attorney | Weekly team hot docs meeting | 09 | 0.50 | \$525 | \$262.50 |
| 03/25/2026 | Jared Hoffman | Senior Staff Attorney | Review list of clawed back and overlayed documents, compare against dep kit documents and revise kits as necessary | 10 | 0.50 | \$525 | \$262.50 |
| 03/25/2026 | Jared Hoffman | Senior Staff Attorney | Draft Acevedo dep kit index | 10 | 5.50 | \$525 | \$2,887.50 |
| 03/25/2026 | Juan Lossada | Senior Staff Attorney | Attend hot docs meeting (0.5 hrs); review clawback production letter from defendants and request saved searches of same from Litigation Support (0.5 hrs) | 09 | 1.00 | \$525 | \$525.00 |
| 03/25/2026 | Juan Lossada | Senior Staff Attorney | Review Patterson final documents for potential setting aside of depkit (1 hr); continue review of Kiani final depo kit documents and concurrent preparation of depkit index (8 hr) | 10 | 9.00 | \$525 | \$4,725.00 |
| 03/25/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: designated native files; prepared & appended designated native files into corresponding production volume; perform various updates within workspace; conducted QC to ensure accuracy; updated search indexes; released and notified Juan Lossada that native files have been added to workspace & are available for review | 09 | 0.50 | \$475 | \$237.50 |
| 03/25/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 8.00 | \$1,600 | \$12,800.00 |
| 03/25/2026 | Paul Charlotin | Litigation Support | Provide Juan Lossada searches created yesterday for Alec clawback review | 09 | 0.25 | \$475 | \$118.75 |
| 03/25/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded Sethi uncoded docs | 09 | 8.00 | \$475 | \$3,800.00 |
| 03/25/2026 | Randall Hirsch | Staff Attorney | Hot doc meeting | 09 | 0.50 | \$475 | \$237.50 |
| 03/25/2026 | Young Lee | Senior Staff Attorney | Attended weekly hot docs meeting w/J. Lossada and corresponded regarding newly produced overlay documents by defendants. | 09 | 0.50 | \$525 | \$262.50 |
| 03/25/2026 | Young Lee | Senior Staff Attorney | Researched question from K. Sinderson regarding report with missing attachments in O'Leary dep kit. | 10 | 0.75 | \$525 | \$393.75 |
| 03/25/2026 | Young Lee | Senior Staff Attorney | Reviewed overlay documents to identify and create replacement exhibits for O'Leary dep kit, updated dep kit index and circulated exhibits. | 10 | 1.75 | \$525 | \$918.75 |
| 03/26/2026 | Abygail Kritta | Associate | Draft mediation submission. | 12 | 1.00 | \$650 | \$650.00 |
| 03/26/2026 | Abygail Kritta | Associate | Attend deposition of Beth O'Leary. | 10 | 4.00 | \$650 | \$2,600.00 |
| 03/26/2026 | Alec Coquin | Senior Counsel | Attended O'Leary deposition | 10 | 4.25 | \$1,100 | \$4,675.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 03/26/2026 | Cindy Bomzer-Stein | Case Manager | Upload deposition transcripts and exhibits to Sharepoint and iManage | 10 | 0.50 | \$450 | \$225.00 |
| 03/26/2026 | Cindy Bomzer-Stein | Case Manager | Organize exhibits regarding B. O'Leary deposition | 10 | 2.00 | \$450 | \$900.00 |
| 03/26/2026 | Daniel Ackeret | Staff Attorney | Continued working on Jason Shaw's Dep Kit | 10 | 6.00 | \$450 | \$2,700.00 |
| 03/26/2026 | Daniel Ackeret | Staff Attorney | Shaw dep kit work | 10 | 3.00 | \$450 | \$1,350.00 |
| 03/26/2026 | Jared Hoffman | Senior Staff Attorney | Shaw dep kit compilation and correspondence with staff attorneys regarding the same | 10 | 4.00 | \$525 | \$2,100.00 |
| 03/26/2026 | Juan Lossada | Senior Staff Attorney | Assist with location of document requests from Katie Sinderson regarding O'Leary deposition (0.75 hrs); complete review of Mazi Kiani final depo documents and complete review of Mazi Kiani depo index (4.5 hrs). | 10 | 5.25 | \$525 | \$2,756.25 |
| 03/26/2026 | Katherine Sinderson | Partner | Deposition and prep | 10 | 7.50 | \$1,600 | \$12,000.00 |
| 03/26/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded Sethi uncoded docs | 09 | 7.50 | \$475 | \$3,562.50 |
| 03/26/2026 | Young Lee | Senior Staff Attorney | Researched follow-up questions from K. Sinderson regarding O'Leary dep kit and uploaded exhibits. | 10 | 1.75 | \$525 | \$918.75 |
| 03/26/2026 | Young Lee | Senior Staff Attorney | Finalized Steg dep kit exhibits for printing. | 10 | 2.50 | \$525 | \$1,312.50 |
| 03/27/2026 | Abygail Krita | Associate | Prepare for mediation. | 12 | 2.25 | \$650 | \$1,462.50 |
| 03/27/2026 | Cindy Bomzer-Stein | Case Manager | Create deposition exhibit list | 10 | 3.50 | \$450 | \$1,575.00 |
| 03/27/2026 | Daniel Ackeret | Staff Attorney | Shaw dep kit work | 10 | 2.25 | \$450 | \$1,012.50 |
| 03/27/2026 | Jared Hoffman | Senior Staff Attorney | Draft Jason Shaw dep kit index | 10 | 5.50 | \$525 | \$2,887.50 |
| 03/27/2026 | Juan Lossada | Senior Staff Attorney | Attend review team meeting | 09 | 0.25 | \$525 | \$131.25 |
| 03/27/2026 | Juan Lossada | Senior Staff Attorney | Run Mazi Kiani dep kit final documents through four clawed back searches created by Lit Support to ensure correct selection of documents (0.5 hrs); review O'Leary dep transcript and exhibits (3.25 hrs); add additional documents to Mazi Kiani dep kit based on O'Leary exhibits (0.5 hrs) | 10 | 4.25 | \$525 | \$2,231.25 |
| 03/27/2026 | Katherine Sinderson | Partner | Submission for mediation | 12 | 5.50 | \$1,600 | \$8,800.00 |
| 03/27/2026 | Randall Hirsch | Staff Attorney | Analyzed/coded Sethi Depo maybe docs | 10 | 2.00 | \$475 | \$950.00 |
| 03/27/2026 | Randall Hirsch | Staff Attorney | Team Meeting | 09 | 0.25 | \$475 | \$118.75 |
| 03/27/2026 | Young Lee | Senior Staff Attorney | Coordinated with OS to print Steg deposition exhibit binders and deliver to A. Coquin. | 10 | 0.25 | \$525 | \$131.25 |
| 03/27/2026 | Young Lee | Senior Staff Attorney | Checked overlay documents for Steg deposition exhibit substitutions | 10 | 0.25 | \$525 | \$131.25 |
| 03/27/2026 | Young Lee | Senior Staff Attorney | Attended weekly review team meeting w/J. Lossada | 09 | 0.25 | \$525 | \$131.25 |
| 03/27/2026 | Young Lee | Senior Staff Attorney | Reviewed 3/26/2026 O'Leary deposition transcript | 10 | 1.00 | \$525 | \$525.00 |
| 03/28/2026 | Abygail Krita | Associate | Draft mediation materials. | 12 | 2.25 | \$650 | \$1,462.50 |
| 03/28/2026 | Juan Lossada | Senior Staff Attorney | Start pdf'ing and highlighting of final Mazi Kiani documents for creation of clean and highlighted final set; also create folder for native documents. | 10 | 5.00 | \$525 | \$2,625.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 03/28/2026 | Katherine Sinderson | Partner | Submission for mediation | 12 | 4.75 | \$1,600 | \$7,600.00 |
| 03/29/2026 | Abygail Krita | Associate | Draft mediation materials. | 12 | 1.00 | \$650 | \$650.00 |
| 03/29/2026 | Alec Coquin | Senior Counsel | Steg depo prep | 10 | 4.75 | \$1,100 | \$5,225.00 |
| 03/29/2026 | Juan Lossada | Senior Staff Attorney | Continue pdf'ing and highlighting of final Mazi Kiani documents for creation of clean and highlighted final set; also add to folder for native documents. | 10 | 7.00 | \$525 | \$3,675.00 |
| 03/29/2026 | Katherine Sinderson | Partner | Submission for mediation | 12 | 5.50 | \$1,600 | \$8,800.00 |
| 03/30/2026 | Abygail Krita | Associate | Draft and finalize mediation supplemental submission. | 12 | 4.50 | \$650 | \$2,925.00 |
| 03/30/2026 | Alec Coquin | Senior Counsel | Steg depo prep | 10 | 8.75 | \$1,100 | \$9,625.00 |
| 03/30/2026 | Cindy Bomzer-Stein | Case Manager | Cite check supplemental letter regarding mediation | 12 | 5.00 | \$450 | \$2,250.00 |
| 03/30/2026 | Daniel Ackeret | Staff Attorney | Finished adding document descriptions for Jason Shaw's dep kit | 10 | 8.00 | \$450 | \$3,600.00 |
| 03/30/2026 | Jared Hoffman | Senior Staff Attorney | Compile Jason Shaw dep kit and draft document index | 10 | 8.00 | \$525 | \$4,200.00 |
| 03/30/2026 | John Rizio-Hamilton | Partner | Mediation submission | 12 | 2.00 | \$1,800 | \$3,600.00 |
| 03/30/2026 | Juan Lossada | Senior Staff Attorney | Continue pdf'ing and highlighting of final Mazi Kiani documents for creation of clean and highlighted final set; also add to folder for native documents. | 10 | 7.25 | \$525 | \$3,806.25 |
| 03/30/2026 | Katherine Sinderson | Partner | Mediation supplemental submission | 12 | 7.00 | \$1,600 | \$11,200.00 |
| 03/30/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit: reviewed/analyzed "maybe folder" | 10 | 9.00 | \$475 | \$4,275.00 |
| 03/30/2026 | Thomas Sperber | Associate | Revise ex parte mediation statement supplement | 12 | 1.50 | \$875 | \$1,312.50 |
| 03/30/2026 | Young Lee | Senior Staff Attorney | Researched question from A. Coquin regarding Lauren Steg | 10 | 0.25 | \$525 | \$131.25 |
| 03/31/2026 | Abygail Krita | Associate | Draft mediation materials and prepare for mediation. | 12 | 4.00 | \$650 | \$2,600.00 |
| 03/31/2026 | Alec Coquin | Senior Counsel | Preparation for Steg deposition | 10 | 8.50 | \$1,100 | \$9,350.00 |
| 03/31/2026 | Alec Coquin | Senior Counsel | Mediation prep | 12 | 3.00 | \$1,100 | \$3,300.00 |
| 03/31/2026 | Cindy Bomzer-Stein | Case Manager | Prepare exhibits regarding L. Steg remote deposition | 10 | 1.00 | \$450 | \$450.00 |
| 03/31/2026 | Cindy Bomzer-Stein | Case Manager | Organize binders regarding mediation | 12 | 7.00 | \$450 | \$3,150.00 |
| 03/31/2026 | Daniel Ackeret | Staff Attorney | Started work on Amit Relia's Dep kit | 10 | 8.00 | \$450 | \$3,600.00 |
| 03/31/2026 | Jared Hoffman | Senior Staff Attorney | Compile and format Jason Shaw dep kit and index | 10 | 9.00 | \$525 | \$4,725.00 |
| 03/31/2026 | John Rizio-Hamilton | Partner | Mediation prep | 12 | 1.75 | \$1,800 | \$3,150.00 |
| 03/31/2026 | Juan Lossada | Senior Staff Attorney | Complete pdfing and highlighting of final Mazi Kiani documents for creation of clean and highlighted sets (5.75 hrs); complete internet searches for Mazi Kiani (0.5 hrs) | 10 | 6.25 | \$525 | \$3,281.25 |
| 03/31/2026 | Katherine Sinderson | Partner | Mediation prep | 12 | 4.00 | \$1,600 | \$6,400.00 |
| 03/31/2026 | Randall Hirsch | Staff Attorney | Reviewed O'Leary transcript | 10 | 3.00 | \$475 | \$1,425.00 |
| 03/31/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe" docs | 10 | 4.50 | \$475 | \$2,137.50 |
| 03/31/2026 | Thomas Sperber | Associate | Call with damages expert re: mediation | 11 | 0.50 | \$875 | \$437.50 |
| 04/01/2026 | Abygail Krita | Associate | Second chair Lauren Steg deposition. | 10 | 8.50 | \$650 | \$5,525.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|-------------|
| 04/01/2026 | Alec Coquin | Senior Counsel | Preparation for and deposition of Lauren Steg | 10 | 10.50 | \$1,100 | \$11,550.00 |
| 04/01/2026 | Daniel Ackeret | Staff Attorney | Sifting hot/high highly relevant docs for inclusion in Relia's kit | 10 | 9.00 | \$450 | \$4,050.00 |
| 04/01/2026 | Jared Hoffman | Senior Staff Attorney | Review and revise Jason Shaw dep kit and document index | 10 | 8.00 | \$525 | \$4,200.00 |
| 04/01/2026 | Juan Lossada | Senior Staff Attorney | Prepare Mazi Kiani memo for dep kit (2 hrs); review Mazi Kiani dep kit index for spelling errors, grammatical errors, and formatting (2.25 hrs). | 10 | 4.25 | \$525 | \$2,231.25 |
| 04/01/2026 | Katherine Sinderson | Partner | Prepare for mediation. | 12 | 8.75 | \$1,600 | \$14,000.00 |
| 04/01/2026 | Katherine Sinderson | Partner | Client meeting | 16 | 2.00 | \$1,600 | \$3,200.00 |
| 04/01/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe" docs | 10 | 9.00 | \$475 | \$4,275.00 |
| 04/01/2026 | Thomas Sperber | Associate | Discuss mediation strategy with K. Sinderson | 12 | 0.25 | \$875 | \$218.75 |
| 04/01/2026 | Thomas Sperber | Associate | Discuss deposition strategy with K. Sinderson | 10 | 0.25 | \$875 | \$218.75 |
| 04/02/2026 | Abygail Krita | Associate | Attend mediation. | 12 | 8.50 | \$650 | \$5,525.00 |
| 04/02/2026 | Alec Coquin | Senior Counsel | Attended mediation; follow-up re mediation | 12 | 9.00 | \$1,100 | \$9,900.00 |
| 04/02/2026 | Daniel Ackeret | Staff Attorney | Sifting hot/high highly relevant docs for inclusion in Relia's kit | 10 | 7.00 | \$450 | \$3,150.00 |
| 04/02/2026 | David Duncan | Senior Counsel | Gathering information about another securities class action in process of settling before Judge Corley | 12 | 0.50 | \$1,100 | \$550.00 |
| 04/02/2026 | Jared Hoffman | Senior Staff Attorney | Finalize and deliver Jason Shaw dep kit | 10 | 4.50 | \$525 | \$2,362.50 |
| 04/02/2026 | Juan Lossada | Senior Staff Attorney | Review Beth O'Leary depo exhibits for substitutions to Mazi Kiani final set of documents (0.5 hrs); review Beth O'Leary dep transcript for references to Mazi Kiani (0.5 hrs); substitute in O'Leary exhibits (8 and 10) to Mazi Kiani final set and renumber dep kit index and corresponding documents in clean and highlighted sets (1.5 hrs); start review of Chad Patterson dep kit final documents and concurrent preparation of dep kit index (4.5 hrs) | 10 | 7.00 | \$525 | \$3,675.00 |
| 04/02/2026 | Katherine Sinderson | Partner | Prepare for mediation and mediation | 12 | 10.00 | \$1,600 | \$16,000.00 |
| 04/02/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe" docs | 10 | 6.75 | \$475 | \$3,206.25 |
| 04/02/2026 | Thomas Sperber | Associate | Begin reviewing fact witness dep kit | 10 | 2.50 | \$875 | \$2,187.50 |
| 04/02/2026 | Thomas Sperber | Associate | Laise with team re: status of mediation negotiations | 12 | 0.50 | \$875 | \$437.50 |
| 04/03/2026 | Abygail Krita | Associate | Draft discovery correspondence. | 08 | 1.00 | \$650 | \$650.00 |
| 04/03/2026 | Daniel Ackeret | Staff Attorney | Sifting hot/high highly relevant docs for inclusion in Relia's kit | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/03/2026 | David Duncan | Senior Counsel | Drafting Term Sheet for mediation; emails re same. | 12 | 1.00 | \$1,100 | \$1,100.00 |
| 04/03/2026 | Juan Lossada | Senior Staff Attorney | Prepare agenda for review team meeting (0.25 hrs); attend review team meeting (0.25 hrs) | 09 | 0.50 | \$525 | \$262.50 |
| 04/03/2026 | Juan Lossada | Senior Staff Attorney | Continue review of Chad Patterson dep kit final documents and concurrent preparation of dep kit index | 10 | 4.00 | \$525 | \$2,100.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 04/03/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 2.00 | \$1,600 | \$3,200.00 |
| 04/03/2026 | Katherine Sinderson | Partner | Discovery review | 09 | 1.75 | \$1,600 | \$2,800.00 |
| 04/03/2026 | Katherine Sinderson | Partner | Post mediation discussions | 12 | 0.50 | \$1,600 | \$800.00 |
| 04/03/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe" docs | 10 | 5.25 | \$475 | \$2,493.75 |
| 04/03/2026 | Randall Hirsch | Staff Attorney | Team meeting | 09 | 0.25 | \$475 | \$118.75 |
| 04/04/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 1.50 | \$1,600 | \$2,400.00 |
| 04/04/2026 | Katherine Sinderson | Partner | Discovery management | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 04/05/2026 | Abygail Krita | Associate | Draft discovery correspondence. | 08 | 4.50 | \$650 | \$2,925.00 |
| 04/06/2026 | Abygail Krita | Associate | Draft discovery correspondence. | 08 | 1.25 | \$650 | \$812.50 |
| 04/06/2026 | Alec Coquin | Senior Counsel | Correspondence with K. Sinderson re depo logistics | 10 | 0.25 | \$1,100 | \$275.00 |
| 04/06/2026 | Cindy Bomzer-Stein | Case Manager | Update deposition exhibit list | 10 | 2.50 | \$450 | \$1,125.00 |
| 04/06/2026 | Cindy Bomzer-Stein | Case Manager | Upload deposition transcripts and exhibits regarding B. O'Leary and L. Steg | 10 | 0.50 | \$450 | \$225.00 |
| 04/06/2026 | Daniel Ackeret | Staff Attorney | Relia Depo Kit work | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/06/2026 | Jared Hoffman | Senior Staff Attorney | Compile Acevedo dep kit and draft document index | 10 | 8.00 | \$525 | \$4,200.00 |
| 04/06/2026 | Juan Lossada | Senior Staff Attorney | Review and revise Mazi Kiani final memo for dep kit (1 hr); review and revise Mazi Kiani dep kit index (0.5 hrs); continue review of Chad Patterson dep kit final documents and concurrent preparation of Patterson dep kit index (5 hrs). | 10 | 6.50 | \$525 | \$3,412.50 |
| 04/06/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 1.50 | \$1,600 | \$2,400.00 |
| 04/06/2026 | Katherine Sinderson | Partner | Discovery management | 08 | 0.50 | \$1,600 | \$800.00 |
| 04/06/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe" docs | 10 | 8.50 | \$475 | \$4,037.50 |
| 04/06/2026 | Thomas Sperber | Associate | Review fact witness dep kit | 10 | 3.50 | \$875 | \$3,062.50 |
| 04/07/2026 | Abygail Krita | Associate | Draft discovery correspondence to opposing counsel. | 08 | 1.75 | \$650 | \$1,137.50 |
| 04/07/2026 | Alec Coquin | Senior Counsel | Correspondence with review team re Kiani depo kit | 10 | 0.25 | \$1,100 | \$275.00 |
| 04/07/2026 | Daniel Ackeret | Staff Attorney | Relia depo kit work; Shaw internet dive and removal of ancillary issues from dep kit. | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/07/2026 | Jared Hoffman | Senior Staff Attorney | Review Shaw dep kit and meet with T. Sperber and D. Ackeret to discuss details | 10 | 2.50 | \$525 | \$1,312.50 |
| 04/07/2026 | Juan Lossada | Senior Staff Attorney | Gather hot doc submissions, update hot docs spreadsheet, circulate pdf and spreadsheet to the entire team | 09 | 0.25 | \$525 | \$131.25 |
| 04/07/2026 | Juan Lossada | Senior Staff Attorney | Final review and adjustment of Mazi Kiani depo kit (2 hrs); compose email to John Rizio-Hamilton detailing contents of binder (0.25 hrs); request preparation of depo kit tags for additional potential witness by Litigation | 10 | 2.50 | \$525 | \$1,312.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 04/07/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: exporting family into searchable PDF & confirming if PDF document is flattened; conducted investigation and confirmed provided PDF file was flattened properly; notified Juan Lossada that exported family was sent via internal Titan file channel & PDF has been flattened correctly | 09 | 0.50 | \$475 | \$237.50 |
| 04/07/2026 | Katherine Sinderson | Partner | Prep for deposition | 10 | 2.50 | \$1,600 | \$4,000.00 |
| 04/07/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe" docs | 10 | 8.50 | \$475 | \$4,037.50 |
| 04/07/2026 | Thomas Sperber | Associate | Fact witness deposition prep, including call with staff attorneys working on deposition kit. | 10 | 2.00 | \$875 | \$1,750.00 |
| 04/07/2026 | Thomas Sperber | Associate | Review revised def priv log. | 09 | 0.25 | \$875 | \$218.75 |
| 04/08/2026 | Alec Coquin | Senior Counsel | Depo logistics discussion with J. Rizio-Hamilton and K. Sinderson | 10 | 0.25 | \$1,100 | \$275.00 |
| 04/08/2026 | Cindy Bomzer-Stein | Case Manager | Calendar upcoming depositions | 10 | 0.25 | \$450 | \$112.50 |
| 04/08/2026 | Daniel Ackeret | Staff Attorney | Relia depo kit work | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/08/2026 | Jared Hoffman | Senior Staff Attorney | Compile Acevedo dep kit and draft document index | 10 | 6.00 | \$525 | \$3,150.00 |
| 04/08/2026 | Juan Lossada | Senior Staff Attorney | Create spreadsheet with list of problem image documents produced by defendants (0.25 hrs); run and review documents from gap searches for inclusion in Chad Patterson dep kit (9 hrs) | 09 | 9.25 | \$525 | \$4,856.25 |
| 04/08/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: review batches; isolated documents for potential fact witness ranked 65% and above & created review batch as requested by Juan Lossada; notified same that potential fact witness's review batch has been created and available for review | 09 | 0.75 | \$475 | \$356.25 |
| 04/08/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe" docs | 10 | 2.00 | \$475 | \$950.00 |
| 04/08/2026 | Randall Hirsch | Staff Attorney | Reviewed "Maybe"/general hot docs for Sethi depo kit | 10 | 7.00 | \$475 | \$3,325.00 |
| 04/08/2026 | Thomas Sperber | Associate | Fact witness deposition prep | 10 | 2.00 | \$875 | \$1,750.00 |
| 04/09/2026 | Alec Coquin | Senior Counsel | Mediation follow-up call with Defendants re stay and follow-up re same | 12 | 1.50 | \$1,100 | \$1,650.00 |
| 04/09/2026 | Alec Coquin | Senior Counsel | Drafted stipulation and proposed order re stay | 12 | 1.50 | \$1,100 | \$1,650.00 |
| 04/09/2026 | Daniel Ackeret | Staff Attorney | Relia Depo Kit work | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/09/2026 | Jared Hoffman | Senior Staff Attorney | Compile Acevedo dep kit and draft document index | 10 | 2.00 | \$525 | \$1,050.00 |
| 04/09/2026 | John Rizio-Hamilton | Partner | Call re discovery. | 08 | 1.00 | \$1,800 | \$1,800.00 |
| 04/09/2026 | Juan Lossada | Senior Staff Attorney | Start review, pdfing, and highlighting of final Chad Patterson documents. | 09 | 6.00 | \$525 | \$3,150.00 |
| 04/09/2026 | Juan Lossada | Senior Staff Attorney | Preparation of Patterson dep kit index. | 10 | 2.50 | \$525 | \$1,312.50 |
| 04/09/2026 | Paul Charlotin | Litigation Support | Add/Modified requested Layout(s), View(s), Field (s), &/or Tag(s)/Choices(s) per Juan's request | 09 | 0.25 | \$475 | \$118.75 |
| 04/09/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit reviewed "Maybe"/other dep kit docs | 10 | 7.75 | \$475 | \$3,681.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 04/10/2026 | Alec Coquin | Senior Counsel | Correspondence with Court re stay and discussion re same | 12 | 1.75 | \$1,100 | \$1,925.00 |
| 04/10/2026 | Daniel Ackeret | Staff Attorney | Relia Depo Kit work | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/10/2026 | Jared Hoffman | Senior Staff Attorney | Compile Acevedo dep kit and draft document index | 10 | 8.00 | \$525 | \$4,200.00 |
| 04/10/2026 | Juan Lossada | Senior Staff Attorney | Continue review, pdfing, and highlighting of final Chad Patterson documents and concurrent preparation of depo kit index | 10 | 8.75 | \$525 | \$4,593.75 |
| 04/10/2026 | Juan Lossada | Senior Staff Attorney | Attend review team meeting. | 09 | 0.25 | \$525 | \$131.25 |
| 04/10/2026 | Randall Hirsch | Staff Attorney | Reviewed other dep kit docs | 10 | 3.75 | \$475 | \$1,781.25 |
| 04/10/2026 | Randall Hirsch | Staff Attorney | Team meeting | 09 | 0.25 | \$475 | \$118.75 |
| 04/10/2026 | Young Lee | Senior Staff Attorney | Attended weekly review team meeting w/J. Lossada | 09 | 0.25 | \$525 | \$131.25 |
| 04/12/2026 | Juan Lossada | Senior Staff Attorney | Continue review, pdfing, and highlighting of final Chad Patterson documents and concurrent preparation of dep kit index. | 10 | 1.25 | \$525 | \$656.25 |
| 04/13/2026 | Abygail Krita | Associate | Manage privilege log issues; discuss case status with team. | 09 | 1.25 | \$650 | \$812.50 |
| 04/13/2026 | Daniel Ackeret | Staff Attorney | Relia dep kit work | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/13/2026 | Danielle Disporto | Senior Staff Attorney | Call with associate to discuss status of privilege log issues, review correspondence to/from defendants on priv log challenges, review defendants updated and initial log, review plaintiffs annotated log and class action complaint | 09 | 5.00 | \$525 | \$2,625.00 |
| 04/13/2026 | Jared Hoffman | Senior Staff Attorney | Compile Acevedo dep kit and draft document index | 10 | 3.00 | \$525 | \$1,575.00 |
| 04/13/2026 | Juan Lossada | Senior Staff Attorney | Complete review, pdfing, and highlighting of final Chad Patterson documents, and concurrent preparation of dep kit index (3.0 hrs); review final Chad Patterson dep kit index for spelling errors and formatting (0.25 hrs); set up new depo kit tags on dep kit coding pane and create depo kit searches and folders of former iRhythm employee (1 hr); review all custodial documents from former iRhythm employee, emails, and documents tagged hot or highly relevant (2 hrs); create initial dep kit index template (0.25 hrs) | 10 | 6.50 | \$525 | \$3,412.50 |
| 04/13/2026 | Katherine Sinderson | Partner | Discovery management | 08 | 1.00 | \$1,600 | \$1,600.00 |
| 04/13/2026 | Lawrence Hosmer | Senior Staff Attorney | Case and privilege log project orientation meeting. | 09 | 0.50 | \$525 | \$262.50 |
| 04/13/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, analyzed documents; reviewed, evaluated, and drafted communications re same. | 09 | 0.75 | \$525 | \$393.75 |
| 04/13/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, analyzed Complaint and selected case materials; reviewed, evaluated, drafted communications re same. | 09 | 1.25 | \$525 | \$656.25 |
| 04/13/2026 | Paul Charlotin | Litigation Support | Add requested users to the workspace | 09 | 0.25 | \$475 | \$118.75 |
| 04/13/2026 | Randall Hirsch | Staff Attorney | Sethi Depo kit: "maybe docs"/ Index | 10 | 8.50 | \$475 | \$4,037.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 04/13/2026 | Thomas Sperber | Associate | Onboard new staff attorneys, including drafting detailed assignment email re: privilege review projects and call to discuss assignment and case; review correspondence on Defs' privilege log disputes. | 09 | 2.50 | \$875 | \$2,187.50 |
| 04/14/2026 | Abygail Krita | Associate | Update work plan for team call; review documents. | 09 | 1.00 | \$650 | \$650.00 |
| 04/14/2026 | Daniel Ackeret | Staff Attorney | Relia dep kit work | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/14/2026 | Danielle Disporto | Senior Staff Attorney | Review correspondence to/from defendants on priv log challenges, review defendants updated and initial log, review plaintiffs annotated log and class action complaint. | 09 | 2.00 | \$525 | \$1,050.00 |
| 04/14/2026 | Danielle Disporto | Senior Staff Attorney | Review Defendants April 7, 2026 updated privilege log and compare production 11 bates numbers to log to identify which documents on updated log were produced with bates numbers. Review Prod 11 documents on updated log to identify if redacted or fully withheld slipsheets. | 09 | 2.50 | \$525 | \$1,312.50 |
| 04/14/2026 | Danielle Disporto | Senior Staff Attorney | Review documents in Prod 11 and manually crosscheck annotated log to identify if document is on the log, whether document is redacted, and on updated privilege log. | 09 | 6.00 | \$525 | \$3,150.00 |
| 04/14/2026 | Jared Hoffman | Senior Staff Attorney | Review fact witness's documents for inclusion in dep kit | 10 | 1.00 | \$525 | \$525.00 |
| 04/14/2026 | Juan Lossada | Senior Staff Attorney | Adjust Relia dep kit IN search so that new IN documents don't mix in with formerly tagged IN documents (0.25 hrs); request RAL65+ batches for Relia emails and custodial uncoded (w/fam) search (0.25 hrs); start review, pdfing, and highlighting of final former iRhythm employee's documents and concurrent preparation of dep kit index (5 hrs). | 10 | 5.50 | \$525 | \$2,887.50 |
| 04/14/2026 | Julio Velazquez | Litigation Support | Conferred with Thomas Sperber re: identifying Defendants' productions that are overlay productions; conducted investigation and identified all overlay productions received to date; provided file path to searches for reference to Thomas Sperber and team as requested. | 09 | 0.50 | \$475 | \$237.50 |
| 04/14/2026 | Katherine Sinderson | Partner | Depo prep | 10 | 1.75 | \$1,600 | \$2,800.00 |
| 04/14/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, analyzed April 7, 2026 revised privilege log; reviewed, evaluated, drafted communications re same. | 09 | 3.75 | \$525 | \$1,968.75 |
| 04/14/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, analyzed documents; reviewed, evaluated, and drafted communications re same. | 09 | 0.50 | \$525 | \$262.50 |
| 04/14/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, analyzed Complaint and selected case materials; reviewed, evaluated, drafted communications re same. | 09 | 2.75 | \$525 | \$1,443.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 04/14/2026 | Randall Hirsch | Staff Attorney | Sethi Depo kit and index | 10 | 9.00 | \$475 | \$4,275.00 |
| 04/14/2026 | Thomas Sperber | Associate | Discuss short-term case strategy with K. Sinderson. | 14 | 0.25 | \$875 | \$218.75 |
| 04/14/2026 | Thomas Sperber | Associate | Draft and send correspondence to Defendants re: adjournment of deposition; review materials for upcoming FE deposition defense; review documents to be added to fact witness depo kit. | 10 | 1.00 | \$875 | \$875.00 |
| 04/14/2026 | Thomas Sperber | Associate | Work with staff attorneys on privilege log projects | 09 | 0.50 | \$875 | \$437.50 |
| 04/15/2026 | Abygail Krita | Associate | Attend team meetings. | 08 | 1.00 | \$650 | \$650.00 |
| 04/15/2026 | Alec Coquin | Senior Counsel | Team strategy call re discovery projects | 08 | 0.50 | \$1,100 | \$550.00 |
| 04/15/2026 | Daniel Ackeret | Staff Attorney | Relia dep kit work | 10 | 7.00 | \$450 | \$3,150.00 |
| 04/15/2026 | Daniel Ackeret | Staff Attorney | Hot docs meeting | 09 | 1.00 | \$450 | \$450.00 |
| 04/15/2026 | Danielle Disporto | Senior Staff Attorney | Review documents in Prod 11 and manually crosscheck annotated log to identify if document is on the log, whether document is redacted, and on updated privilege log. MS teams call with associate to discuss priv log research updates and feedback. | 09 | 10.00 | \$525 | \$5,250.00 |
| 04/15/2026 | Jared Hoffman | Senior Staff Attorney | Review fact witness's documents for relevance | 09 | 2.00 | \$525 | \$1,050.00 |
| 04/15/2026 | Jared Hoffman | Senior Staff Attorney | Review fact witness's documents for potential for inclusion in dep kit | 10 | 2.00 | \$525 | \$1,050.00 |
| 04/15/2026 | Juan Lossada | Senior Staff Attorney | Search for FOIA materials previously produced by defendants and compare with January production; attend team meeting. | 09 | 0.75 | \$525 | \$393.75 |
| 04/15/2026 | Juan Lossada | Senior Staff Attorney | Continue reviewing, pdfing, and highlighting of final documents of former iRhythm employee and concurrent preparation of dep kit index | 10 | 6.25 | \$525 | \$3,281.25 |
| 04/15/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: new Depo Kit tag for TURAKHIA and BLACKFORD; created new TURAKHIA and BLACKFORD DepoKit tags and choices within "BLBG_DepoKit Prep" coding panel; notified Juan Lossada that TURAKHIA and BLACKFORD DepoKit tag and choices were added to coding panel as requested | 10 | 0.50 | \$475 | \$237.50 |
| 04/15/2026 | Katherine Sinderson | Partner | Discovery meeting. | 09 | 0.50 | \$1,600 | \$800.00 |
| 04/15/2026 | Katherine Sinderson | Partner | Call with counsel re depositions, review of deposition docs | 10 | 0.75 | \$1,600 | \$1,200.00 |
| 04/15/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, analyzed documents; reviewed, evaluated, and drafted communications re same. | 09 | 4.00 | \$525 | \$2,100.00 |
| 04/15/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, analyzed April 7, 2026, revised privilege log; reviewed, evaluated, drafted communications re same. | 09 | 3.75 | \$525 | \$1,968.75 |
| 04/15/2026 | Randall Hirsch | Staff Attorney | Hot doc meeting | 09 | 0.25 | \$475 | \$118.75 |
| 04/15/2026 | Randall Hirsch | Staff Attorney | Sethi Depo kit: Index | 10 | 7.75 | \$475 | \$3,681.25 |
| 04/15/2026 | Thomas Sperber | Associate | Hot docs call and team meeting; review correspondence | 09 | 1.75 | \$875 | \$1,531.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 04/16/2026 | Abygail Kritta | Associate | Research and review using everlaw. | 09 | 1.75 | \$650 | \$1,137.50 |
| 04/16/2026 | Alec Coquin | Senior Counsel | Patterson depo preparation and related follow-up searches | 10 | 3.00 | \$1,100 | \$3,300.00 |
| 04/16/2026 | Daniel Ackeret | Staff Attorney | Relia dep kit work | 10 | 4.00 | \$450 | \$1,800.00 |
| 04/16/2026 | Danielle Disporto | Senior Staff Attorney | Review documents in Prod 11 and manually crosscheck annotated log to identify if document is on the log, whether document is redacted, and on updated privilege log. | 09 | 10.00 | \$525 | \$5,250.00 |
| 04/16/2026 | Jared Hoffman | Senior Staff Attorney | Review emails and custodial documents for relevance and potential for inclusion in fact witness's dep kit | 10 | 5.00 | \$525 | \$2,625.00 |
| 04/16/2026 | John Rizio-Hamilton | Partner | Settlement analysis; communications re mediation. | 12 | 2.50 | \$1,800 | \$4,500.00 |
| 04/16/2026 | Juan Lossada | Senior Staff Attorney | Continue review, pdfing, and highlighting of final Ahmed Salim documents and concurrent preparation of dep kit index (1 hr); research Patterson job responsibilities and CAPA responsibilities (0.5 hrs). | 10 | 1.50 | \$525 | \$787.50 |
| 04/16/2026 | Juan Lossada | Senior Staff Attorney | Locate document in Kiani production requested by A. Coquin (0.25 hrs); start review of Kiani generated transcripts (2 hrs). | 09 | 2.25 | \$525 | \$1,181.25 |
| 04/16/2026 | Katherine Sinderson | Partner | Correspondence re documents. | 09 | 0.75 | \$1,600 | \$1,200.00 |
| 04/16/2026 | Katherine Sinderson | Partner | Correspondence re mediation | 12 | 0.75 | \$1,600 | \$1,200.00 |
| 04/16/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026, revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.00 | \$525 | \$4,200.00 |
| 04/16/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit: index and pdfs | 10 | 8.00 | \$475 | \$3,800.00 |
| 04/16/2026 | Thomas Sperber | Associate | Work with team on privilege challenge projects | 09 | 1.00 | \$875 | \$875.00 |
| 04/17/2026 | Alec Coquin | Senior Counsel | Attention to discovery projects | 09 | 1.50 | \$1,100 | \$1,650.00 |
| 04/17/2026 | Alec Coquin | Senior Counsel | Attention to discovery projects re turnaround time | 09 | 1.50 | \$1,100 | \$1,650.00 |
| 04/17/2026 | Daniel Ackeret | Staff Attorney | Relia dep kit work | 10 | 8.00 | \$450 | \$3,600.00 |
| 04/17/2026 | Danielle Disporto | Senior Staff Attorney | Review documents in Prod 11 and manually crosscheck annotated log to identify if document is on the log, whether document is redacted, and on updated privilege log. Compare bates numbers of documents in Prod 11 to work product on annotated log to check for discrepancies. | 09 | 8.50 | \$525 | \$4,462.50 |
| 04/17/2026 | Jared Hoffman | Senior Staff Attorney | Review emails and custodial documents for relevance and potential for inclusion in fact witness's dep kit | 10 | 6.00 | \$525 | \$3,150.00 |
| 04/17/2026 | John Rizio-Hamilton | Partner | Settlement analysis and mediation strategy. | 12 | 1.75 | \$1,800 | \$3,150.00 |
| 04/17/2026 | Katherine Sinderson | Partner | Researching documents on new platform | 09 | 2.00 | \$1,600 | \$3,200.00 |
| 04/17/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026, revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.50 | \$525 | \$4,462.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 04/17/2026 | Randall Hirsch | Staff Attorney | Sethi depo kit: index/pdfs | 10 | 5.50 | \$475 | \$2,612.50 |
| 04/17/2026 | Thomas Sperber | Associate | Search for and review hot documents using new document review and case management program; discuss hot documents with team. | 09 | 3.25 | \$875 | \$2,843.75 |
| 04/17/2026 | Thomas Sperber | Associate | Draft responses to substantive points raised by Defendants to mediator and circulate to team | 12 | 1.50 | \$875 | \$1,312.50 |
| 04/17/2026 | Young Lee | Senior Staff Attorney | Attended weekly review team meeting w/J. Lossada | 09 | 0.25 | \$525 | \$131.25 |
| 04/18/2026 | Katherine Sinderson | Partner | Mediator call | 12 | 0.50 | \$1,600 | \$800.00 |
| 04/18/2026 | Katherine Sinderson | Partner | Doc research | 09 | 1.50 | \$1,600 | \$2,400.00 |
| 04/19/2026 | Daniel Ackeret | Staff Attorney | Relia dep kit work | 10 | 3.00 | \$450 | \$1,350.00 |
| 04/19/2026 | Katherine Sinderson | Partner | Doc research | 09 | 1.25 | \$1,600 | \$2,000.00 |
| 04/20/2026 | Danielle Disporto | Senior Staff Attorney | Review documents in Prod 11 and manually crosscheck annotated log to identify if document is on the log, whether document is redacted, and on updated privilege log. Compare bates numbers of documents in Prod 11 to work product on annotated log to check for discrepancies. Create saved searches requested by case team of Prod 11 documents produced without redaction and those that fell of Defendants' initial privilege log. Communication with case team re: same | 09 | 9.00 | \$525 | \$4,725.00 |
| 04/20/2026 | Jared Hoffman | Senior Staff Attorney | Compile fact witness's dep kit and draft document index | 10 | 8.00 | \$525 | \$4,200.00 |
| 04/20/2026 | Jared Hoffman | Senior Staff Attorney | Research draft history of IRTC 2023 Form 10-K | 09 | 1.50 | \$525 | \$787.50 |
| 04/20/2026 | John Rizio-Hamilton | Partner | Settlement analysis; communications re mediation. | 12 | 2.00 | \$1,800 | \$3,600.00 |
| 04/20/2026 | Juan Lossada | Senior Staff Attorney | Discussions with Office Services and Cindy Bomzer-Stein regarding updates to Mazi Kiani dep kit index and binder | 10 | 0.25 | \$525 | \$131.25 |
| 04/20/2026 | Juan Lossada | Senior Staff Attorney | Start review of non-custodial Mazi Kiani related generated transcripts (4 hrs); assist with in document database for materials requested (0.25) | 09 | 4.25 | \$525 | \$2,231.25 |
| 04/20/2026 | Katherine Sinderson | Partner | Correspondence re mediation | 12 | 0.75 | \$1,600 | \$1,200.00 |
| 04/20/2026 | Katherine Sinderson | Partner | Client call re post-mediation discussions | 16 | 0.50 | \$1,600 | \$800.00 |
| 04/20/2026 | Katherine Sinderson | Partner | Doc research | 09 | 3.75 | \$1,600 | \$6,000.00 |
| 04/20/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026, revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 9.00 | \$525 | \$4,725.00 |
| 04/20/2026 | Young Lee | Senior Staff Attorney | Researched question about revisions to draft 10-K containing problematic language. | 09 | 0.25 | \$525 | \$131.25 |
| 04/21/2026 | Abygail Krita | Associate | Research and review on Everlaw. | 09 | 2.50 | \$650 | \$1,625.00 |
| 04/21/2026 | Cindy Bomzer-Stein | Case Manager | Revise deposition kit binder regarding M. Kiani | 10 | 1.75 | \$450 | \$787.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 04/21/2026 | Danielle Disporto | Senior Staff Attorney | Review Defendants updated privilege log dated April 7, 2026 and review/analyze saved search of documents of newly added bates numbers and identify possible challenges. | 09 | 8.00 | \$525 | \$4,200.00 |
| 04/21/2026 | Jared Hoffman | Senior Staff Attorney | Compile fact witness's dep kit and draft document index | 10 | 8.00 | \$525 | \$4,200.00 |
| 04/21/2026 | Juan Lossada | Senior Staff Attorney | Create dep kit folder and saved searches for Mintu Turakhia (0.5 hrs); add write up to former employee's dep kit, update index, and renumber clean and highlighted document sets (0.75 hrs); continue review of non-custodial generated transcripts that mention Mazi Kiani (3 hrs) | 10 | 4.25 | \$525 | \$2,231.25 |
| 04/21/2026 | Juan Lossada | Senior Staff Attorney | Request creation of Relativity Active Learning 65+ batches from Litigation Support | 09 | 0.25 | \$525 | \$131.25 |
| 04/21/2026 | Katherine Sinderson | Partner | Review of hot documents | 09 | 1.00 | \$1,600 | \$1,600.00 |
| 04/21/2026 | Katherine Sinderson | Partner | Review of deposition kit | 10 | 1.00 | \$1,600 | \$1,600.00 |
| 04/21/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026, revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.50 | \$525 | \$4,462.50 |
| 04/21/2026 | Paul Charlotin | Litigation Support | Created the requested batch set(s) | 09 | 0.50 | \$475 | \$237.50 |
| 04/22/2026 | Abygail Kritta | Associate | Rsearch and review using everlaw; attend weekly team meeting. | 09 | 1.75 | \$650 | \$1,137.50 |
| 04/22/2026 | Alec Coquin | Senior Counsel | Evaluated Defendants' damages numbers and scenarios | 14 | 1.50 | \$1,100 | \$1,650.00 |
| 04/22/2026 | Alec Coquin | Senior Counsel | Document review on new review platform | 09 | 0.75 | \$1,100 | \$825.00 |
| 04/22/2026 | Cindy Bomzer-Stein | Case Manager | Meet with A. Kritta regarding depositions | 10 | 0.25 | \$450 | \$112.50 |
| 04/22/2026 | Danielle Disporto | Senior Staff Attorney | Review Defendants updated privilege log dated April 7, 2026 and review/analyze saved search of documents of newly added bates numbers and identify possible challenges to assert based on log's description, lack of attorneys or other challenge. | 09 | 8.00 | \$525 | \$4,200.00 |
| 04/22/2026 | Jared Hoffman | Senior Staff Attorney | Review, finalize and circulate Acevedo dep kit | 10 | 2.50 | \$525 | \$1,312.50 |
| 04/22/2026 | Jared Hoffman | Senior Staff Attorney | Review fact witness's custodial documents and emails for potential inclusion in dep kit | 10 | 5.50 | \$525 | \$2,887.50 |
| 04/22/2026 | John Rizio-Hamilton | Partner | Settlement analysis; communications re mediation. | 12 | 2.00 | \$1,800 | \$3,600.00 |
| 04/22/2026 | Juan Lossada | Senior Staff Attorney | Continue review of generated transcripts that are non-custodial to Mazi Kiani but contain hits for Mazi or Kiani, for potential addition to Mazi Kiani dep kit. | 10 | 7.00 | \$525 | \$3,675.00 |
| 04/22/2026 | Katherine Sinderson | Partner | Review of hot documents | 09 | 1.00 | \$1,600 | \$1,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 04/22/2026 | Katherine Sinderson | Partner | Review of deposition kit | 10 | 2.75 | \$1,600 | \$4,400.00 |
| 04/22/2026 | Katherine Sinderson | Partner | Settlement call and negotiations | 12 | 1.75 | \$1,600 | \$2,800.00 |
| 04/22/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026 revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.50 | \$525 | \$4,462.50 |
| 04/22/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed documents and removed calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 04/22/2026 | Thomas Sperber | Associate | Weekly team meeting. | 09 | 1.00 | \$875 | \$875.00 |
| 04/22/2026 | Thomas Sperber | Associate | Prep for upcoming fact deposition | 10 | 3.25 | \$875 | \$2,843.75 |
| 04/23/2026 | Abygail Krita | Associate | Draft response letter to defendants re settlement. | 12 | 3.25 | \$650 | \$2,112.50 |
| 04/23/2026 | Danielle Disporto | Senior Staff Attorney | Review Defendants updated privilege log dated April 7, 2026 and review/analyze saved search of documents of newly added bates numbers and identify possible challenges to assert based on log's description, lack of attorneys or other challenge. | 09 | 8.00 | \$525 | \$4,200.00 |
| 04/23/2026 | Jared Hoffman | Senior Staff Attorney | Review fact witness's custodial documents and emails. | 09 | 5.00 | \$525 | \$2,625.00 |
| 04/23/2026 | Jared Hoffman | Senior Staff Attorney | Compile fact witness's dep kit and draft document index | 10 | 3.00 | \$525 | \$1,575.00 |
| 04/23/2026 | Juan Lossada | Senior Staff Attorney | Complete review of Mazi Kiani non custodial generated transcripts (0.5 hrs); request creation of Quentin Blackford dep kit tags and RAL batches from Litigation support, and create dep kit folder and saved searches (0.75 hrs); add document to Chad Patterson clean and highlighted dep kit documents and update the dep kit index (0.5 hrs); deliver dep kit in electronic form to Katie Sinderson, Alec Coquin, Tom Sperber, and Abby Krita (0.25 hrs) | 10 | 2.00 | \$525 | \$1,050.00 |
| 04/23/2026 | Juan Lossada | Senior Staff Attorney | Start and complete review of Quentin Blackford Relativity Active Learning batch (3 hrs); prepare meeting agenda for 4/24 review team meeting (0.25 hrs) | 09 | 3.25 | \$525 | \$1,706.25 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|---|-----------|-------|---------|------------|
| 04/23/2026 | Julio Velazquez | Litigation Support | Conferred with Juan Lossada re: new Depo Kit tag for BLACKFORD; created new BLACKFORD DepoKit tags and choices within "BLBG_DepoKit Prep" coding panel; notified Juan Lossada that BLACKFORD DepoKit tag and choice and fields were added to coding panel as requested; conferred with Juan Lossada re: BLACKFORD review batches; isolated BLACKFORD documents ranked 65% and above & created review batches as requested by Juan Lossada; notified same that BLACKFORD review batches have been created and available for review | 09 | 0.75 | \$475 | \$356.25 |
| 04/23/2026 | Katherine Sinderson | Partner | Settlement discussions/follow up with team | 12 | 0.50 | \$1,600 | \$800.00 |
| 04/23/2026 | Katherine Sinderson | Partner | Discusssion with client re settlement | 16 | 0.50 | \$1,600 | \$800.00 |
| 04/23/2026 | Katherine Sinderson | Partner | Reviewing depo kit | 10 | 2.00 | \$1,600 | \$3,200.00 |
| 04/23/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026, revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.00 | \$525 | \$4,200.00 |
| 04/23/2026 | Thomas Sperber | Associate | Draft substantive response to Defendants' email re: merits for mediation negotiations | 12 | 2.50 | \$875 | \$2,187.50 |
| 04/24/2026 | Abygail Krita | Associate | Draft correspondence to opposing counsel; discuss with team. | 08 | 1.00 | \$650 | \$650.00 |
| 04/24/2026 | Danielle Disporto | Senior Staff Attorney | Review Defendants updated privilege log dated April 7, 2026 and review/analyze saved search of documents of newly added bates numbers and identify possible challenges to assert based on log's description, lack of attorneys or other challenge. | 09 | 8.00 | \$525 | \$4,200.00 |
| 04/24/2026 | Jared Hoffman | Senior Staff Attorney | Compile fact witness's dep kit and draft document index | 10 | 3.50 | \$525 | \$1,837.50 |
| 04/24/2026 | Juan Lossada | Senior Staff Attorney | Weekly meeting with review team; | 09 | 0.25 | \$525 | \$131.25 |
| 04/24/2026 | Juan Lossada | Senior Staff Attorney | Continue review of hot and highly relevant documents for potential inclusion in Quentin Blackford dep kit | 10 | 7.25 | \$525 | \$3,806.25 |
| 04/24/2026 | Katherine Sinderson | Partner | Drafting settlement response | 12 | 4.75 | \$1,600 | \$7,600.00 |
| 04/24/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026, revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 7.25 | \$525 | \$3,806.25 |
| 04/24/2026 | Thomas Sperber | Associate | Edit response letter to defendants re: mediation | 12 | 1.25 | \$875 | \$1,093.75 |
| 04/24/2026 | Young Lee | Senior Staff Attorney | Attended weekly review team meeting with J. Lossada | 09 | 0.25 | \$525 | \$131.25 |
| 04/25/2026 | Juan Lossada | Senior Staff Attorney | Create first draft of Chad Patterson dep kit memo. | 10 | 1.00 | \$525 | \$525.00 |
| 04/25/2026 | Katherine Sinderson | Partner | Drafting settlement response | 12 | 2.25 | \$1,600 | \$3,600.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|-------------------|-----------------------|---|-----------|-------|-------|------------|
| 04/26/2026 | Juan Lossada | Senior Staff Attorney | Add new document (with 23 attachments) to Mazi Kiani kit, pdf and highlight, update and renumber index, update and renumber clean set and highlighted set of documents. | 10 | 1.25 | \$525 | \$656.25 |
| 04/26/2026 | Thomas Sperber | Associate | Review depo kit docs | 10 | 0.25 | \$875 | \$218.75 |
| 04/27/2026 | Jared Hoffman | Senior Staff Attorney | Finalize and circulate fact witness's dep kit | 10 | 3.50 | \$525 | \$1,837.50 |
| 04/27/2026 | Juan Lossada | Senior Staff Attorney | Finalize Chad Patterson's memo and index (1.25 hrs); continue review of Quentin Blackford's hot and highly relevant docs for potential inclusion in the dep kit (6.5 hrs). | 10 | 7.75 | \$525 | \$4,068.75 |
| 04/27/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026 revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.25 | \$525 | \$4,331.25 |
| 04/28/2026 | Juan Lossada | Senior Staff Attorney | Complete review of Quentin Blackford 'hot' and 'highly relevant' tagged documents for potential inclusion in the dep kit (5.75 hrs); start review of Quentin Blackford 'maybe' tagged documents for potential inclusion in the dep kit (2 hrs) | 10 | 7.75 | \$525 | \$4,068.75 |
| 04/28/2026 | Juan Lossada | Senior Staff Attorney | Notify team regarding no hot doc submissions for 4/29 hot docs meeting | 09 | 0.25 | \$525 | \$131.25 |
| 04/28/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026 revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.25 | \$525 | \$4,331.25 |
| 04/28/2026 | Thomas Sperber | Associate | Review recent class certification cases in 9th circuit for potential supplemental authority | 07 | 0.25 | \$875 | \$218.75 |
| 04/28/2026 | Thomas Sperber | Associate | Review defendants' substantive merits message re: settlement and discuss issues and responses | 12 | 0.50 | \$875 | \$437.50 |
| 04/29/2026 | Abygail Krita | Associate | Discuss case with team. | 08 | 0.75 | \$650 | \$487.50 |
| 04/29/2026 | Danielle Disporto | Senior Staff Attorney | Review Defendants updated privilege log dated April 7, 2026 and review/analyze saved search of documents of newly added bates numbers and identify possible challenges to assert based on log's description, lack of attorneys or other challenge. | 09 | 2.00 | \$525 | \$1,050.00 |
| 04/29/2026 | Juan Lossada | Senior Staff Attorney | Add document to Kiani dep kit and update index and clean and highlighted sets, flatten highlighted addition, and send to Office Services for addition of modifications to dep kit (0.75 hrs); complete review of Quentin Blackford 'maybe' tagged documents (6 hrs) | 10 | 6.75 | \$525 | \$3,543.75 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|-----------------------|--|-----------|-------|---------|------------|
| 04/29/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026, revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 8.25 | \$525 | \$4,331.25 |
| 04/30/2026 | Abygail Krita | Associate | Attend team meeting to discuss dep kits. | 10 | 0.50 | \$650 | \$325.00 |
| 04/30/2026 | Cindy Bomzer-Stein | Case Manager | Retrieve news regarding first quarter earnings release | 15 | 0.50 | \$450 | \$225.00 |
| 04/30/2026 | Juan Lossada | Senior Staff Attorney | Attend team meeting re depo kits; flatten Chad Patterson highlighted documents and circulate depo kit links to team | 10 | 0.50 | \$525 | \$262.50 |
| 04/30/2026 | Juan Lossada | Senior Staff Attorney | Start review of Quentin Blackford uncoded emails and custodials documents. | 09 | 6.50 | \$525 | \$3,412.50 |
| 04/30/2026 | Katherine Sinderson | Partner | Settlement discussions/follow up with team | 12 | 1.50 | \$1,600 | \$2,400.00 |
| 04/30/2026 | Katherine Sinderson | Partner | Follow up with client re settlement discussions | 16 | 0.75 | \$1,600 | \$1,200.00 |
| 04/30/2026 | Thomas Sperber | Associate | Call with staff attorney team re: dep kits. | 10 | 0.50 | \$875 | \$437.50 |
| 04/30/2026 | Thomas Sperber | Associate | Team strategy call | 12 | 0.25 | \$875 | \$218.75 |
| 05/01/2026 | Alec Coquin | Senior Counsel | Depo logistics correspondence | 10 | 0.25 | \$1,100 | \$275.00 |
| 05/01/2026 | Lawrence Hosmer | Senior Staff Attorney | Reviewed, evaluated, analyzed April 7, 2026 revised privilege log; reviewed, analyzed documents re same; reviewed, evaluated, and drafted communications re same. | 09 | 1.00 | \$525 | \$525.00 |
| 05/01/2026 | Thomas Sperber | Associate | Review latest 10-Q. | 14 | 0.25 | \$875 | \$218.75 |
| 05/01/2026 | Thomas Sperber | Associate | Discuss litigation status with expert | 11 | 0.50 | \$875 | \$437.50 |
| 05/04/2026 | Abygail Krita | Associate | Correspond with team concerning potential settlement. | 12 | 0.50 | \$650 | \$325.00 |
| 05/04/2026 | Alec Coquin | Senior Counsel | Correspondence to Defendants and Court re settlement | 12 | 0.50 | \$1,100 | \$550.00 |
| 05/04/2026 | David Duncan | Senior Counsel | Reviewing & revising Term Sheet; emails re same; reviewing draft email to Defendants and to Court. | 12 | 0.50 | \$1,100 | \$550.00 |
| 05/04/2026 | Juan Lossada | Senior Staff Attorney | Everlaw searches for iRhythm documents | 09 | 1.00 | \$525 | \$525.00 |
| 05/04/2026 | Juan Lossada | Senior Staff Attorney | Continue review of Quentin Blackford final documents for dep kit inclusion and development of index | 10 | 5.00 | \$525 | \$2,625.00 |
| 05/05/2026 | Abygail Krita | Associate | Draft stipulations for preliminary approval of settlement motion. | 12 | 1.25 | \$650 | \$812.50 |
| 05/05/2026 | Abygail Krita | Associate | Draft correspondence to the court related to settlement. | 12 | 0.50 | \$650 | \$325.00 |
| 05/05/2026 | Alec Coquin | Senior Counsel | Discussion re preliminary approval motion and long declaration | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/05/2026 | Alec Coquin | Senior Counsel | Correspondence with vendors re settlement | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/05/2026 | David Duncan | Senior Counsel | Emails re selection of Escrow Bank and Claims Administrator; emails re planning for work; emails re use of Postcard Notice. | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/05/2026 | Katherine Sinderson | Partner | Client meeting re settlement | 16 | 2.00 | \$1,600 | \$3,200.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|----------------|--|-----------|-------|---------|------------|
| 05/05/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and email, docketed document and removed calendared events. | 13 | 1.00 | \$500 | \$500.00 |
| 05/06/2026 | Katherine Sinderson | Partner | Term sheet | 12 | 2.00 | \$1,600 | \$3,200.00 |
| 05/07/2026 | Abygail Krita | Associate | Draft stipulation of settlement. | 12 | 2.25 | \$650 | \$1,462.50 |
| 05/07/2026 | Alec Coquin | Senior Counsel | Correspondence re settlement | 12 | 0.50 | \$1,100 | \$550.00 |
| 05/07/2026 | David Duncan | Senior Counsel | Reviewing Defendants' proposed edits to Term Sheet; emails re same. | 12 | 1.00 | \$1,100 | \$1,100.00 |
| 05/08/2026 | Abygail Krita | Associate | Draft stipulation for preliminary approval motion. | 12 | 0.50 | \$650 | \$325.00 |
| 05/08/2026 | Alec Coquin | Senior Counsel | Review stip of settlement | 12 | 0.50 | \$1,100 | \$550.00 |
| 05/08/2026 | David Duncan | Senior Counsel | Reviewing & revising draft of Stipulation of Settlement; email re same. | 12 | 2.50 | \$1,100 | \$2,750.00 |
| 05/12/2026 | Abygail Krita | Associate | Draft stipulation for preliminary approval motion and incorporate edits from D. Duncan. | 12 | 1.00 | \$650 | \$650.00 |
| 05/12/2026 | David Duncan | Senior Counsel | Circulating execution copy of Term Sheet. | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/13/2026 | David Duncan | Senior Counsel | Recirculating Term Sheet for signature; emails re same. | 12 | 1.00 | \$1,100 | \$1,100.00 |
| 05/14/2026 | Alec Coquin | Senior Counsel | Review of and edits to stip of settlement | 12 | 0.50 | \$1,100 | \$550.00 |
| 05/14/2026 | David Duncan | Senior Counsel | Emails re Stipulation and related papers. | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/14/2026 | Thomas Sperber | Associate | Work on settlement stip and send draft to defendants | 12 | 0.75 | \$875 | \$656.25 |
| 05/15/2026 | David Duncan | Senior Counsel | Emails re edits to Stipulation. | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/18/2026 | David Duncan | Senior Counsel | Discussions re settlement papers; reviewing emails to Claims Administrators with RFP. | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/23/2026 | David Duncan | Senior Counsel | Reviewing draft Stipulation of Settlement. | 12 | 0.25 | \$1,100 | \$275.00 |
| 05/26/2026 | Abygail Krita | Associate | Draft preliminary approval motion for settlement filing. | 12 | 2.75 | \$650 | \$1,787.50 |
| 05/26/2026 | David Duncan | Senior Counsel | Drafting preliminary approval order, judgment, claim form and summary notice; T/Cs and emails re work on settlement papers and timing. | 12 | 1.75 | \$1,100 | \$1,925.00 |
| 05/27/2026 | Abygail Krita | Associate | Draft preliminary approval of settlement motion. | 12 | 3.25 | \$650 | \$2,112.50 |
| 05/27/2026 | Abygail Krita | Associate | Review and send preliminary approval motion exhibits to defendants. | 12 | 0.50 | \$650 | \$325.00 |
| 05/27/2026 | David Duncan | Senior Counsel | Drafting & circulating exhibits to Stipulation for review; researching Jude Corley's past cases and procedures and email re same. | 12 | 2.50 | \$1,100 | \$2,750.00 |
| 05/28/2026 | Cindy Bomzer-Stein | Case Manager | Draft shell declarations regarding motion for preliminary approval of settlement | 12 | 1.00 | \$450 | \$450.00 |
| 05/28/2026 | David Duncan | Senior Counsel | Drafting long notice; circulating & discussing with litigation team and circulating to Defendants; work on Plan of Allocation issues. | 12 | 2.25 | \$1,100 | \$2,475.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|---------------------|----------------|---|-----------|-------|---------|------------|
| 05/28/2026 | Thomas Sperber | Associate | Review and revise draft long notice; draft attorney declaration in support of settlement motion and circulate to team for review; review and analyze various damages analyses for use in settlement papers | 12 | 2.50 | \$875 | \$2,187.50 |
| 05/29/2026 | Abygail Krita | Associate | Review and correspond with opposing counsel regarding settlement materials. | 12 | 0.25 | \$650 | \$162.50 |
| 05/29/2026 | Cindy Bomzer-Stein | Case Manager | Draft shell declarations regarding motion for preliminary approval of settlement | 12 | 1.25 | \$450 | \$562.50 |
| 05/31/2026 | David Duncan | Senior Counsel | Drafting email re selection of Claims Administrator. | 12 | 0.25 | \$1,100 | \$275.00 |
| 06/01/2026 | David Duncan | Senior Counsel | Work on settlement papers, including reviewing & revising preliminary approval motion, emails re selection of Claims Administrator; reviewing Defendants' edits to Stipulation and exhibits. | 12 | 4.75 | \$1,100 | \$5,225.00 |
| 06/02/2026 | Cindy Bomzer-Stein | Case Manager | Draft sealing motion regarding preliminary approval of settlement motion | 12 | 1.00 | \$450 | \$450.00 |
| 06/02/2026 | David Duncan | Senior Counsel | Work on settlement papers, including reviewing & revising preliminary approval motion, reviewing & revising Plan of Allocation; drafting & revising Strategic Claims Services Decl. in support of preliminary approval; T/C with damages expert re Plan of Allocation and range of maximum damages; drafting further edits to the Stipulation and all exhibits. | 12 | 5.50 | \$1,100 | \$6,050.00 |
| 06/02/2026 | Katherine Sinderson | Partner | Prelim approval papers | 12 | 2.00 | \$1,600 | \$3,200.00 |
| 06/02/2026 | Thomas Sperber | Associate | Draft portions of and revise several preliminary approval settlement papers | 12 | 3.25 | \$875 | \$2,843.75 |
| 06/03/2026 | Cindy Bomzer-Stein | Case Manager | Draft filing plan regarding preliminary approval motion | 12 | 0.50 | \$450 | \$225.00 |
| 06/03/2026 | Cindy Bomzer-Stein | Case Manager | Cite check brief regarding motion for preliminary approval | 12 | 5.75 | \$450 | \$2,587.50 |
| 06/03/2026 | David Duncan | Senior Counsel | Work on various aspects of settlement papers and preliminary approval motion, including reviewing & revising motion and supporting decl. of K. Sinderson, revising documents re submission of Supplemental Agreement under seal; preparing execution copies and circulating fully executed versions | 12 | 4.50 | \$1,100 | \$4,950.00 |
| 06/03/2026 | Katherine Sinderson | Partner | Prelim approval papers | 12 | 0.75 | \$1,600 | \$1,200.00 |
| 06/03/2026 | Thomas Sperber | Associate | Revise and circulate settlement papers; draft email to court re: timing of filing of preliminary approval papers | 12 | 2.00 | \$875 | \$1,750.00 |
| 06/04/2026 | Abygail Krita | Associate | Review final papers for settlement filing. | 12 | 1.00 | \$650 | \$650.00 |
| 06/04/2026 | Cindy Bomzer-Stein | Case Manager | Complete cite checking brief regarding motion for preliminary approval | 12 | 0.75 | \$450 | \$337.50 |
| 06/04/2026 | Cindy Bomzer-Stein | Case Manager | Input table of authorities regarding preliminary approval motion | 12 | 0.75 | \$450 | \$337.50 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|--------------------------|---|-----------|-------|---------|------------|
| 06/04/2026 | David Duncan | Senior Counsel | Reviewing, revising, finalizing & arranging for filing of preliminary approval motion and supporting documents. | 12 | 3.25 | \$1,100 | \$3,575.00 |
| 06/04/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and motion, docketed documents and calendared events. | 13 | 0.75 | \$500 | \$375.00 |
| 06/05/2026 | David Duncan | Senior Counsel | Updating settlement charts re developments in iRhythm. | 12 | 0.25 | \$1,100 | \$275.00 |
| 06/11/2026 | Abygail Krita | Associate | Correspond re settlement. | 12 | 0.25 | \$650 | \$162.50 |
| 06/11/2026 | David Duncan | Senior Counsel | Forwarding Strategic Claims Services contact information for sending to Defendants' Counsel. | 12 | 0.25 | \$1,100 | \$275.00 |
| 06/12/2026 | Cindy Bomzer-Stein | Case Manager | Complete transcript order form for related case regarding motion hearing for preliminary approval of settlement | 13 | 0.75 | \$450 | \$337.50 |
| 06/12/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and order, docketed document and adjourned calendared events. | 13 | 0.50 | \$500 | \$250.00 |
| 06/13/2026 | David Duncan | Senior Counsel | Updating schedule based on revised preliminary approval hearing dates. | 12 | 0.25 | \$1,100 | \$275.00 |
| 06/15/2026 | Cindy Bomzer-Stein | Case Manager | Upload preliminary approval transcript regarding related case to iMange | 12 | 0.25 | \$450 | \$112.50 |
| 06/16/2026 | David Duncan | Senior Counsel | Research & gathering prior Judge Corley transcripts and other relevant documents to prepare for preliminary approval hearing. | 12 | 1.00 | \$1,100 | \$1,100.00 |
| 06/24/2026 | David Duncan | Senior Counsel | Emails re planning for preliminary approval hearing. | 12 | 0.25 | \$1,100 | \$275.00 |
| 06/25/2026 | David Duncan | Senior Counsel | Emails re wire instructions and Form W-9. | 12 | 0.50 | \$1,100 | \$550.00 |
| 06/26/2026 | David Duncan | Senior Counsel | Prep for preliminary approval hearing. | 12 | 0.25 | \$1,100 | \$275.00 |
| 06/28/2026 | Janielle Lattimore | Assistant Managing Clerk | Docket transcript order | 13 | 0.25 | \$475 | \$118.75 |
| 06/30/2026 | David Duncan | Senior Counsel | Emails with K. Sinderson re preparing for preliminary approval hearing and whether hearing will be accessible by Zoom. | 12 | 0.50 | \$1,100 | \$550.00 |
| 07/02/2026 | David Duncan | Senior Counsel | Emails re Zoom hearing on preliminary approval motion. | 12 | 0.25 | \$1,100 | \$275.00 |
| 07/03/2026 | Thomas Sperber | Associate | Coordinate with insurance counsel re: contact at Huntington bank | 12 | 0.25 | \$875 | \$218.75 |
| 07/05/2026 | David Duncan | Senior Counsel | Drafting outline for preliminary approval hearing. | 12 | 2.00 | \$1,100 | \$2,200.00 |
| 07/06/2026 | David Duncan | Senior Counsel | Drafting outline for preliminary approval hearing. | 12 | 4.50 | \$1,100 | \$4,950.00 |
| 07/08/2026 | Cindy Bomzer-Stein | Case Manager | Organize binder for K. Sinderson regarding hearing on preliminary approval of settlement | 12 | 2.00 | \$450 | \$900.00 |
| 07/08/2026 | David Duncan | Senior Counsel | O/C with K. Sinderson re preparation for iRhythm preliminary approval hearing; assembling binder re same. | 12 | 1.50 | \$1,100 | \$1,650.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------------|----------------|--|-----------|-------|---------|------------|
| 07/09/2026 | David Duncan | Senior Counsel | Preparing for hearing on preliminary approval, including collecting materials answering questions from K. Sinderson re questions raised by other courts at preliminary approval stage and issues related to schedule. | 12 | 1.50 | \$1,100 | \$1,650.00 |
| 07/10/2026 | Cindy Bomzer-Stein | Case Manager | Draft and finalize transcript request form regarding motion for preliminary approval hearing | 12 | 0.50 | \$450 | \$225.00 |
| 07/10/2026 | Cindy Bomzer-Stein | Case Manager | Communicate with court reporter regarding motion for preliminary approval hearing | 12 | 0.50 | \$450 | \$225.00 |
| 07/10/2026 | David Duncan | Senior Counsel | Attending hearing on preliminary approval; revising proposed Order and Notices based on discussion at hearing; email to Defendants re same. | 12 | 1.75 | \$1,100 | \$1,925.00 |
| 07/10/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket, notices and order, docketed documents and calendared events. Reviewed documents for filing compliance, filed and docketed documents. | 13 | 1.50 | \$500 | \$750.00 |
| 07/13/2026 | Cindy Bomzer-Stein | Case Manager | Review and finalize for filing notice regarding preliminary approval of settlement | 12 | 1.00 | \$450 | \$450.00 |
| 07/13/2026 | David Duncan | Senior Counsel | Reviewing transcript of Friday's hearing; drafting notice of filing of revised Preliminary Approval Order and Notices; arranging for filing of same; reviewing Preliminary Approval Order filed by the Court; drafting settlement schedule; inserting dates into notice materials and circulating to Strategic Claims Services; drafting email to Defendants' Counsel re payment information and timing. | 12 | 3.00 | \$1,100 | \$3,300.00 |
| 07/13/2026 | Mahiri Buffong | Managing Clerk | Reviewed docket and orders, docketed documents and calendared events. | 13 | 2.25 | \$500 | \$1,125.00 |
| 07/14/2026 | David Duncan | Senior Counsel | O/C with K. Sinderson re preliminary approval order & schedule; email to Defendants' Counsel re upcoming deadlines. | 12 | 0.25 | \$1,100 | \$275.00 |
| 07/16/2026 | David Duncan | Senior Counsel | Reviewing SCS's proposed edits to Notice. Claim Form, and Summary Notice; making responsive edits and email re same. | 12 | 0.75 | \$1,100 | \$825.00 |
| 07/21/2026 | David Duncan | Senior Counsel | Proofreading & revising broker letter, Notice and Claims Form; emails with SCS re same. | 12 | 3.00 | \$1,100 | \$3,300.00 |
| 07/22/2026 | David Duncan | Senior Counsel | Reviewing versions of Summary Notice formatted for publication. | 12 | 0.50 | \$1,100 | \$550.00 |
| 07/23/2026 | David Duncan | Senior Counsel | Reviewing & signing off on PR Newswire version of Summary Notice. | 12 | 0.25 | \$1,100 | \$275.00 |
| 07/26/2026 | David Duncan | Senior Counsel | Drafting updates to blbglaw re proposed Settlement. | 12 | 1.50 | \$1,100 | \$1,650.00 |
| 07/27/2026 | David Duncan | Senior Counsel | Reviewing & revising SCS website. | 12 | 0.50 | \$1,100 | \$550.00 |

| Date | Professional | Title | Narrative | Task Code | Hours | Rate | Lodestar |
|------------|--------------|----------------|--|-----------|-------|---------|------------|
| 07/28/2026 | David Duncan | Senior Counsel | Reviewing phone script; reviewing & testing websites; research into pre-settlement callers; drafting checklist/schedule for final approval papers. | 12 | 1.00 | \$1,100 | \$1,100.00 |

Exhibit 7



Bernstein Litowitz Berger & Grossmann LLP
Attorneys at Law

Firm Resume

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Since our founding in 1983, Bernstein Litowitz Berger & Grossmann LLP has obtained more than \$40 billion in recoveries on behalf of investors. The firm has obtained some of the largest settlements ever agreed to by public companies related to securities fraud, including six of the 15 largest in history. Working with our clients, we have also used the litigation process to achieve precedent-setting reforms that have increased market transparency, held wrongdoers accountable, and improved corporate business practices in groundbreaking ways.

Firm Overview

Bernstein Litowitz Berger & Grossmann LLP (BLB&G), a national law firm with offices located in New York, California, Delaware, Louisiana, and Illinois, prosecutes class and private actions on behalf of individual and institutional clients. The firm's litigation practice areas include securities class and direct actions in federal and state courts; corporate governance and shareholder rights litigation, including claims for breach of fiduciary duty and proxy violations; mergers and acquisitions and transactional litigation; alternative dispute resolution; and distressed debt and bankruptcy. We also handle, on behalf of major institutional clients and lenders, more general complex commercial litigation involving allegations of breach of contract, accountants' liability, breach of fiduciary duty, fraud, and negligence.

We are the nation's leading firm representing institutional investors in securities fraud class action litigation. The firm's institutional client base includes U.S. public pension funds the New York State Common Retirement Fund; the California Public Employees' Retirement System (CalPERS); the Los Angeles County Employees Retirement Association; the Chicago Municipal, Police and Labor Retirement Systems; the Teacher Retirement System of Texas; the Arkansas Teacher Retirement System; the Florida State Board of Administration; the Public Employees' Retirement System of Mississippi; the New York State Teachers' Retirement System; the Ohio Public Employees Retirement System; the State Teachers Retirement System of Ohio; the Oregon Public Employees Retirement System; the Virginia Retirement System; the Louisiana School, State, Teachers and Municipal Police Retirement Systems; the Public School Teachers' Pension and Retirement Fund of Chicago; the New Jersey Division of Investment of the Department of the Treasury; TIAA-CREF and other private institutions; as well as numerous other public and Taft-Hartley pension entities. Our European client base includes APG; Aegon AM; ATP; Blue Sky Group; Hermes IM; Robeco; SEB; Handelsbanken; Nykredit; PGB; and PGGM, among others.

More Top Securities Recoveries Than Any Other Firm

Since its founding in 1983, BLB&G has prosecuted some of the most complex cases in history and obtained more than \$40 billion on behalf of investors. The firm has negotiated and obtained many of the largest securities recoveries in history, including:

- *In re WorldCom, Inc. Securities Litigation* – \$6.19 billion recovery
- *In re Cendant Corporation Securities Litigation* – \$3.3 billion recovery
- *In re Bank of America Corp. Securities, Derivative, and Employee Retirement Income Security Act (ERISA) Litigation* – \$2.43 billion recovery

- *In re Allianz Global Investors U.S. Litigation* – More than \$2 billion recovered in a series of direct actions
- *In re Nortel Networks Corporation Securities Litigation (Nortel II)* – \$1.07 billion recovery
- *In re Merck & Co., Inc. Securities Litigation* – \$1.06 billion recovery
- *In re McKesson HBOC, Inc. Securities Litigation* – \$1.05 billion recovery
- *In re Wells Fargo & Company Securities Litigation* – \$1.00 billion recovery

Based on our record of success, BLB&G has been at the top of the rankings by ISS Securities Class Action Services (ISS-SCAS), a leading industry research publication that provides independent and objective third-party analysis and statistics on securities-litigation law firms, since its inception. In its most recent report, [Top 100 U.S. Class Action Settlements of All-Time](#), ISS-SCAS once again ranked BLB&G as the top firm in the field for the 14th year in a row. BLB&G has served as lead or co-lead counsel in 38 of the ISS-SCAS's top 100 U.S. securities-fraud settlements—significantly more than any other firm—and recovered over \$27 billion for investors in those cases, nearly \$9 billion more than any other plaintiffs' securities firm.

Giving Shareholders a Voice and Changing Business Practices for the Better

BLB&G was among the first law firms ever to obtain meaningful corporate governance reforms through litigation. In courts throughout the country, we prosecute shareholder class and derivative actions, asserting claims for breach of fiduciary duty and proxy violations wherever the conduct of corporate officers and/or directors, or M&A transactions, seeks to deprive shareholders of fair value, undermine shareholder voting rights, or allow management to profit at the expense of shareholders.

We have prosecuted seminal cases establishing precedent that has increased market transparency, held wrongdoers accountable, addressed issues in the boardroom and executive suite, challenged unfair deals, and improved corporate business practices in groundbreaking ways. We have confronted a variety of questionable, unethical, and proliferating corporate practices, setting new standards of director independence, restructuring board practices in the wake of persistent illegal conduct, challenging the improper use of defensive measures and deal protections for management's benefit, and confronting stock options backdating abuses and other self-dealing by executives.

Practice Areas

Securities Fraud Litigation

Securities fraud litigation is the cornerstone of the firm's litigation practice. Since its founding, the firm has had the distinction of having tried and prosecuted many of the most high-profile securities fraud class actions in history, recovering billions of dollars and obtaining unprecedented corporate governance reforms on behalf of our clients. BLB&G continues to play a leading role in major securities litigation pending in federal and state courts, and the firm remains one of the nation's leaders in representing institutional investors in securities fraud class litigation.

The firm also pursues direct actions in securities fraud cases, when appropriate. By selectively opting out of certain securities class actions, we seek to resolve our clients' claims efficiently and for substantial multiples of what they might otherwise recover from related class action settlements.

Our attorneys have extensive experience in the laws that regulate the securities markets and in the disclosure requirements of corporations that issue publicly traded securities. Many also have accounting backgrounds. The group has access to state-of-the-art, online financial wire services and databases, which enable it to instantaneously investigate any potential securities fraud action involving a public company's debt and equity securities. Biographies for our attorneys can be accessed on the firm's website by clicking [here](#).

Corporate Governance and Shareholder Rights

Our Corporate Governance and Shareholder Rights attorneys prosecute derivative actions, claims for breach of fiduciary duty, and proxy violations on behalf of individual and institutional investors in state and federal courts throughout the country. We have prosecuted actions challenging numerous highly publicized corporate transactions that violated fair process, fair price, and the applicability of the business judgment rule, and have also addressed issues of corporate waste, shareholder voting rights claims, and executive compensation.

Our attorneys have prosecuted numerous cases regarding the improper "backdating" of executive stock options that resulted in windfall undisclosed compensation to executives at the direct expense of shareholders—and returned hundreds of millions of dollars to company coffers. We also represent institutional clients in lawsuits seeking to enforce fiduciary obligations in connection with mergers and acquisitions and going-private transactions that deprive shareholders of fair value when participants buy companies from their public shareholders "on the cheap." Although enough shareholders accept the consideration offered for the transaction to close, many sophisticated investors correctly recognize and ultimately enjoy the increased returns to be obtained by pursuing appraisal rights and demanding that courts assign a "true value" to the shares taken private in these transactions.

Our attorneys are well versed in changing SEC rules and regulations on corporate governance issues and have a comprehensive understanding of a wide variety of corporate law transactions and both substantive and courtroom expertise in the specific legal areas involved. As a result of the firm's high-profile and widely recognized capabilities, our attorneys are increasingly in demand with institutional investors who are exercising a more assertive voice with corporate boards regarding corporate governance issues and the boards' accountability to shareholders.

Distressed Debt and Bankruptcy

BLB&G has obtained billions of dollars through litigation on behalf of bondholders and creditors of distressed and bankrupt companies, as well as through third-party litigation brought by bankruptcy trustees and creditors' committees against auditors, appraisers, lawyers, officers and directors, and other defendants who may have contributed to client losses. As counsel, we advise institutions and individuals nationwide in developing strategies and tactics to recover assets presumed lost as a result of bankruptcy. Our record in this practice area is characterized by extensive trial experience in addition to successful settlements.

Commercial Litigation

BLB&G provides contingency fee representation in complex business litigation and has obtained substantial recoveries on behalf of investors, corporations, bankruptcy trustees, creditor committees, and other business entities. We have faced down the most powerful and well-funded law firms and defendants in the country—and consistently prevailed. For example, on behalf of the bankruptcy trustee, the firm prosecuted *BFA Liquidation Trust v. Arthur Andersen*, arising from the largest nonprofit bankruptcy in U.S. history. After two years of litigation and a week-long trial, the firm obtained a \$217 million recovery from Andersen for the Trust. Combined with other recoveries, the total amounted to more than 70 percent of the Trust's losses.

Having obtained huge recoveries with nominal out-of-pocket expenses and fees of less than 20 percent, we have repeatedly demonstrated that valuable claims are best prosecuted by a first-rate litigation firm on a contingent basis at negotiated percentages. Legal representation need not compound the risk and high cost inherent in today's complex and competitive business environment. We are paid only if we (and our clients) win. The result: the highest quality legal representation at a fair price.

Alternative Dispute Resolution

BLB&G offers clients an accomplished team and a creative venue in which to resolve conflicts outside of the litigation process. We have experience in U.S. and international disputes, and our attorneys have led complex business-to-business arbitrations and mediations domestically and abroad, representing clients before all the major arbitration tribunals, including the American Arbitration Association, FINRA, JAMS, International Chamber of Commerce, and the London Court of International Arbitration.

Our lawyers have successfully arbitrated cases that range from complex business-to-business disputes to individuals' grievances with employers. It is our experience that in some cases, a well-executed arbitration process can resolve disputes faster, with limited appeals and a higher level of confidentiality than public litigation.

In the wake of the credit crisis, for example, we successfully represented numerous former executives of a major financial institution in arbitrations relating to claims for compensation. We have also assisted clients with disputes involving failure to honor compensation commitments, disputes over the purchase of securities, businesses seeking compensation for uncompleted contracts, and unfulfilled financing commitments.

Feedback from the Courts

Throughout the firm's history, many courts have recognized the professional excellence and diligence of the firm and its members. A few examples are set forth below.

In re WorldCom, Inc. Securities Litigation

- The Honorable Denise Cote of the United States District Court for the Southern District of New York

"I have the utmost confidence in plaintiffs' counsel...they have been doing a superb job...The Class is extraordinarily well represented in this litigation."

"The magnitude of this settlement is attributable in significant part to Lead Counsel's advocacy and energy...The quality of the representation given by Lead Counsel...has been superb...and is unsurpassed in this Court's experience with plaintiffs' counsel in securities litigation."

"Lead Counsel has been energetic and creative...Its negotiations with the Citigroup Defendants have resulted in a settlement of historic proportions."

* * *

In re Clarent Corporation Securities Litigation

- The Honorable Charles R. Breyer of the United States District Court for the Northern District of California

"It was the best tried case I've witnessed in my years on the bench...."

"[A]n extraordinarily civilized way of presenting the issues to you [the jury]...We've all been treated to great civility and the highest professional ethics in the presentation of the case..."

"These trial lawyers are some of the best I've ever seen."

* * *

Landry's Restaurants, Inc. Shareholder Litigation

- Vice Chancellor J. Travis Laster of the Delaware Court of Chancery

"I do want to make a comment again about the excellent efforts...put into this case...This case, I think, shows precisely the type of benefits that you can achieve for stockholders and how representative litigation can be a very important part of our corporate governance system...you hold up this case as an example of what to do."

* * *

McCall V. Scott (Columbia/HCA Derivative Litigation)

- The Honorable Thomas A. Higgins of the United States District Court for the Middle District of Tennessee

"Counsel's excellent qualifications and reputations are well documented in the record, and they have litigated this complex case adeptly and tenaciously throughout the six years it has been pending. They assumed an enormous risk and have shown great patience by taking this case on a contingent basis, and despite an early setback they have persevered and brought about not only a large cash settlement but sweeping corporate reforms that may be invaluable to the beneficiaries."

Significant Recoveries

BLB&G has successfully identified, investigated, and prosecuted many of the most significant securities and shareholder actions in history, recovering billions of dollars on behalf of defrauded investors and obtaining groundbreaking corporate-governance reforms. These resolutions include eight recoveries of over \$1 billion, more than any other firm in our field. Examples of cases with our most significant recoveries include:

Securities Fraud Litigation

Case: *In re WorldCom, Inc. Securities Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$6.19 billion securities fraud class action recovery—the second largest in history; unprecedented recoveries from Director Defendants.

Case Summary: Investors suffered massive losses in the wake of the financial fraud and subsequent bankruptcy of former telecom giant WorldCom. This litigation alleged that WorldCom and others disseminated false and misleading statements to the investing public regarding its earnings and financial condition in violation of the federal securities and other laws. It further alleged a nefarious relationship between Citigroup subsidiary Salomon Smith Barney and WorldCom, carried out primarily by Salomon employees involved in providing investment banking services to WorldCom, and by WorldCom's former CEO and CFO. As Court-appointed Co-Lead Counsel representing Lead Plaintiff the New York State Common Retirement Fund, we obtained unprecedented settlements totaling more than \$6 billion from the Investment Bank Defendants who underwrote WorldCom bonds, including a \$2.575 billion cash settlement to settle all claims against the Citigroup Defendants. On the eve of trial, the 13 remaining "Underwriter Defendants," including J.P. Morgan Chase, Deutsche Bank, and Bank of America, agreed to pay settlements totaling nearly \$3.5 billion to resolve all claims against them. Additionally, the day before trial was scheduled to begin, the former WorldCom Director Defendants agreed to pay over \$60 million to settle the claims against them. An unprecedented first for outside directors, \$24.75 million of that amount came out of the pockets of the individuals—20% of their collective net worth. *The Wall Street Journal*, in its coverage, profiled the settlement as having "shaken Wall Street, the audit profession and corporate boardrooms." After four weeks of trial, Arthur Andersen, WorldCom's former auditor, settled for \$65 million. Subsequent settlements were reached with the former executives of WorldCom, and then with Andersen, bringing the total obtained for the Class to over \$6.19 billion.

Case: *In re Cendant Corporation Securities Litigation*

Court: United States District Court for the District of New Jersey

Highlights: \$3.3 billion securities fraud class action recovery—the third largest in history; significant corporate governance reforms obtained.

- Summary:** The firm was Co-Lead Counsel in this class action against Cendant Corporation, its officers and directors and Ernst & Young (E&Y), its auditors, for their role in disseminating materially false and misleading financial statements concerning the company's revenues, earnings and expenses for its 1997 fiscal year. As a result of companywide accounting irregularities, Cendant restated its financial results for its 1995, 1996, and 1997 fiscal years and all fiscal quarters therein. Cendant agreed to settle the action for \$2.8 billion and to adopt some of the most extensive corporate governance changes in history. E&Y settled for \$335 million. These settlements remain the largest sums ever recovered from a public company and a public accounting firm through securities class action litigation. BLB&G represented Lead Plaintiffs CalPERS, the New York State Common Retirement Fund, and the New York City Pension Funds, the three largest public pension funds in America, in this action.
- Case:** *In re Bank of America Corp. Securities, Derivative, and Employee Retirement Income Security Act (ERISA) Litigation*
- Court:** United States District Court for the Southern District of New York
- Highlights:** \$2.425 billion in cash; significant corporate governance reforms to resolve all claims. This recovery is by far the largest shareholder recovery related to the subprime meltdown and credit crisis; the single largest securities class action settlement ever resolving a Section 14(a) claim—the federal securities provision designed to protect investors against misstatements in connection with a proxy solicitation; the largest ever funded by a single corporate defendant for violations of the federal securities laws; the single largest settlement of a securities class action in which there was neither a financial restatement involved nor a criminal conviction related to the alleged misconduct; and one of the 10 largest securities class action recoveries in history.
- Summary:** The firm represented Co-Lead Plaintiffs the State Teachers Retirement System of Ohio, the Ohio Public Employees Retirement System, and the Teacher Retirement System of Texas in this securities class action filed on behalf of shareholders of Bank of America Corporation (BAC) arising from BAC's 2009 acquisition of Merrill Lynch & Co. The action alleges that BAC, Merrill Lynch, and certain of the companies' current and former officers and directors violated the federal securities laws by making a series of materially false statements and omissions in connection with the acquisition. These violations included the alleged failure to disclose information regarding billions of dollars of losses Merrill had suffered before the BAC shareholder vote on the proposed acquisition, as well as an undisclosed agreement allowing Merrill to pay billions in bonuses before the acquisition closed despite these losses. Not privy to these material facts, BAC shareholders voted to approve the acquisition.
- Case:** *In re Allianz Global Investors U.S. Litigation*
- Court:** Cases primarily filed in the United States District Court for the Southern District of New York
- Highlights:** Over \$2 billion dollars recovered for investors in a series of more than 20 direct actions.

Summary: BLB&G prosecuted claims on behalf of institutional investors that suffered losses in connection with investments in the Allianz Structured Alpha Funds—a suite of investment products developed and overseen by Allianz Global Investors U.S.—due to Allianz’s breaches of fiduciary and contractual duties. BLB&G negotiated settlements that returned over \$2 billion to investors. Our firm filed a series of direct actions, including the first complaint in this matter on behalf of Arkansas Teacher Retirement System, and subsequently served as liaison counsel in more than 20 related actions.

Allianz’s representations concerning the Alpha Funds were also investigated by the SEC and the U.S. Department of Justice. Allianz ultimately set aside over \$6 billion to deal with government investigations and lawsuits resulting from the collapse of the Structured Alpha Funds.

Case: *In re Nortel Networks Corporation Securities Litigation (Nortel II)*

Court: United States District Court for the Southern District of New York

Highlights: Over \$1.07 billion in cash and common stock recovered for the class.

Summary: This securities fraud class action charged Nortel Networks Corporation and certain of its officers and directors with violations of the Securities Exchange Act of 1934, alleging that the Defendants knowingly or recklessly made false and misleading statements with respect to Nortel’s financial results during the relevant period. BLB&G clients the Ontario Teachers’ Pension Plan Board and the Treasury of the State of New Jersey and its Division of Investment were appointed as Co-Lead Plaintiffs for the Class in one of two related actions (Nortel II), and BLB&G was appointed Lead Counsel for the Class. In a historic settlement, Nortel agreed to pay \$2.4 billion in cash and Nortel common stock to resolve both matters. Nortel later announced that its insurers had agreed to pay \$228.5 million toward the settlement, bringing the total amount of the global settlement to approximately \$2.7 billion, and the total amount of the Nortel II settlement to over \$1.07 billion.

Case: *In re Merck & Co., Inc. Securities Litigation*

Court: United States District Court, District of New Jersey

Highlights: \$1.06 billion recovery for the class.

Summary: This case arises out of misrepresentations and omissions concerning life-threatening risks posed by the “blockbuster” COX-2 painkiller Vioxx, which Merck withdrew from the market in 2004. In January 2016, BLB&G achieved a \$1.062 billion settlement on the eve of trial after more than 12 years of hard-fought litigation that included a successful decision at the United States Supreme Court. This settlement is the second-largest recovery ever obtained in the Third Circuit and one of the top securities recoveries of all time. BLB&G represented Lead Plaintiff the Public Employees’ Retirement System of Mississippi.

- Case:** *In re McKesson HBOC, Inc. Securities Litigation*
- Court:** United States District Court for the Northern District of California
- Highlights:** \$1.05 billion recovery for the class.
- Summary:** This securities fraud litigation was filed on behalf of purchasers of HBOC, McKesson, and McKesson HBOC securities, alleging that Defendants misled the investing public concerning HBOC's and McKesson HBOC's financial results. On behalf of Lead Plaintiff the New York State Common Retirement Fund, BLB&G obtained a \$960 million settlement from the company, \$72.5 million in cash from Arthur Andersen, and, on the eve of trial, a \$10 million settlement from Bear Stearns & Co., with total recoveries reaching more than \$1 billion.
-
- Case:** *In re Wells Fargo & Company Securities Litigation*
- Court:** United States District Court for the Southern District of New York
- Highlights:** \$1 billion recovery for the class, the top U.S. securities class action settlement of 2023, among the top six in the past decade, and among the top 17 of all time.
- Summary:** In 2018, Wells Fargo's regulators imposed unprecedented consent orders on Wells Fargo designed to halt the bank's decades-long, fraudulent banking practices and rectify the severely deficient corporate oversight that allowed those fraudulent practices to develop and endure (the "2018 Consent Orders"). In this action, lead plaintiffs, represented by BLB&G as co-lead counsel, alleged that Wells Fargo and certain of its senior executives issued false and misleading statements to investors regarding the status of Wells Fargo's compliance with the 2018 Consent Orders, claiming that the bank had regulator-approved "plans" and that it was "in compliance" with the Orders. In reality, Wells Fargo had yet to submit to regulators an acceptable plan or schedule for overhauling the bank's compliance and oversight practices and was nowhere near meeting the regulators' requirements that were a predicate to lifting the severe measures imposed on the bank. Wells Fargo investors were harmed after a series of disclosures, including damning congressional hearings and reports, revealed the truth to the market that the bank had blatantly disregarded the basic requirements set forth in the 2018 Consent Orders. The \$1 billion settlement was reached after three years of hard-fought litigation and was achieved with the assistance of a respected mediator, former U.S. District Judge Layn R. Phillips.
-
- Case:** *HealthSouth Corporation Bondholder Litigation*
- Court:** United States District Court for the Northern District of Alabama
- Highlights:** \$804.5 million in total recoveries.
- Summary:** In this litigation, BLB&G was the appointed Co-Lead Counsel for the bond holder class, representing Lead Plaintiff the Retirement Systems of Alabama. This action arose from allegations that Birmingham-based HealthSouth Corporation overstated its earnings at the direction of its founder and former CEO Richard Scrushy. Subsequent revelations disclosed that the overstatement exceeded

over \$2.4 billion, virtually wiping out all of HealthSouth's reported profits for the prior five years. A total recovery of \$804.5 million was obtained in this litigation through a series of settlements, including an approximately \$445 million settlement for shareholders and bondholders, a \$100 million in cash settlement from UBS AG, UBS Warburg LLC, and individual UBS Defendants, and \$33.5 million in cash from the company's auditor. The total settlement for injured HealthSouth bond purchasers exceeded \$230 million, recouping over a third of bond purchaser damages.

Case: *In re Washington Public Power Supply System Litigation*

Court: United States District Court for the District of Arizona

Highlights: Over \$750 million—the largest securities fraud settlement ever achieved at the time.

Summary: BLB&G was appointed Chair of the Executive Committee responsible for litigating on behalf of the class in this action. The case was litigated for over seven years and involved an estimated 200 million pages of documents produced in discovery; the depositions of 285 fact witnesses and 34 expert witnesses; more than 25,000 introduced exhibits; six published district court opinions; seven appeals or attempted appeals to the Ninth Circuit; and a three-month jury trial, which resulted in a settlement of over \$750 million—then the largest securities fraud settlement ever achieved.

Case: *In re Lehman Brothers Equity/Debt Securities Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$735 million in total recoveries.

Summary: Representing the Government of Guam Retirement Fund, BLB&G successfully prosecuted this securities class action arising from Lehman Brothers Holdings' issuance of billions of dollars in offerings of debt and equity securities that were sold using offering materials that contained untrue statements and missing material information.

After four years of intense litigation, Lead Plaintiffs achieved a total of \$735 million in recoveries consisting of a \$426 million settlement with underwriters of Lehman securities offerings, a \$90 million settlement with former Lehman directors and officers, a \$99 million settlement that resolves claims against Ernst & Young, Lehman's former auditor (considered one of the top 10 auditor settlements ever achieved), and a \$120 million settlement that resolves claims against UBS Financial Services. This recovery is remarkable not only because of the difficulty in recovering assets when the issuer defendant is bankrupt, but also because no financial results were restated, and the auditors never disavowed the statements.

Case: *In re Citigroup, Inc. Bond Action Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$730 million cash recovery, the second largest recovery in a litigation arising from the financial crisis.

Summary: In the years prior to the collapse of the subprime mortgage market, Citigroup issued 48 offerings of preferred stock and bonds. This securities fraud class action was filed on behalf of purchasers of Citigroup bonds and preferred stock alleging that these offerings contained material misrepresentations and omissions regarding Citigroup's exposure to billions of dollars in mortgage-related assets, the loss reserves for its portfolio of high-risk residential mortgage loans, and the credit quality of the risky assets it held in off-balance sheet entities known as "structured investment vehicles." After protracted litigation lasting four years, we obtained a \$730 million cash recovery—the second largest securities class action recovery in a litigation arising from the financial crisis, and the second largest recovery ever in a securities class action brought on behalf of purchasers of debt securities. As Lead Bond Counsel for the Class, BLB&G represented Lead Bond Plaintiffs Minneapolis Firefighters' Relief Association, Louisiana Municipal Police Employees' Retirement System, and Louisiana Sheriffs' Pension and Relief Fund.

Case: *In re Schering-Plough Corporation/Enhance Securities Litigation; In re Merck & Co., Inc. Vytorin/Zetia Securities Litigation*

Court: United States District Court for the District of New Jersey

Highlights: \$688 million in combined settlements (Schering-Plough settled for \$473 million; Merck settled for \$215 million) in this coordinated securities fraud litigations filed on behalf of investors in Merck and Schering-Plough.

Summary: After nearly five years of intense litigation, just days before trial, BLB&G resolved the two actions against Merck and Schering-Plough, which stemmed from claims that Merck and Schering artificially inflated their market value by concealing material information and making false and misleading statements regarding their blockbuster anti-cholesterol drugs Zetia and Vytorin. Specifically, we alleged that the companies knew that their "ENHANCE" clinical trial of Vytorin (a combination of Zetia and a generic) demonstrated that Vytorin was no more effective than the cheaper generic at reducing artery thickness. The companies nonetheless championed the "benefits" of their drugs, attracting billions of dollars of capital. When public pressure to release the results of the ENHANCE trial became too great, the companies reluctantly announced these negative results, which we alleged led to sharp declines in the value of the companies' securities, resulting in significant losses to investors. The combined \$688 million in settlements (Schering-Plough settled for \$473 million; Merck settled for \$215 million) is the second largest securities recovery ever in the Third Circuit, among the top 25 settlements of all time, and among the 10 largest recoveries ever in a case where there was no financial restatement. BLB&G represented Lead Plaintiffs Arkansas Teacher Retirement System, the Public Employees' Retirement System of Mississippi, and the Louisiana Municipal Police Employees' Retirement System.

Case: *In re Lucent Technologies, Inc. Securities Litigation*

Court: United States District Court for the District of New Jersey

Highlights: \$667 million in total recoveries; the appointment of BLB&G as Co-Lead Counsel is especially noteworthy as it marked the first time since the 1995 passage of the Private Securities Litigation Reform Act that a court reopened the lead plaintiff or lead counsel selection process to account for changed circumstances, new issues, and possible conflicts between new and old allegations.

Summary: BLB&G served as Co-Lead Counsel in this securities class action, representing Lead Plaintiffs the Parnassus Fund, Teamsters Locals 175 & 505 D&P Pension Trust, Anchorage Police and Fire Retirement System, and the Louisiana School Employees' Retirement System. The complaint accused Lucent of making false and misleading statements to the investing public concerning its publicly reported financial results and failing to disclose the serious problems in its optical networking business. When the truth was disclosed, Lucent admitted that it had improperly recognized revenue of nearly \$679 million in fiscal 2000. The settlement obtained in this case is valued at approximately \$667 million, and is composed of cash, stock, and warrants.

Case: *In re Wachovia Preferred Securities and Bond/Notes Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$627 million recovery—among the largest securities class action recoveries in history; third-largest recovery obtained in an action arising from the subprime mortgage crisis.

Summary: This securities class action was filed on behalf of investors in certain Wachovia bonds and preferred securities against Wachovia Corp., certain former officers and directors, various underwriters, and its auditor, KPMG. The case alleged that Wachovia provided offering materials that misrepresented and omitted material facts concerning the nature and quality of Wachovia's multibillion-dollar option-ARM (adjustable rate mortgage) "Pick-A-Pay" mortgage loan portfolio, and that Wachovia's loan loss reserves were materially inadequate. According to the Complaint, these undisclosed problems threatened the viability of the financial institution, requiring it to be "bailed out" during the financial crisis before it was acquired by Wells Fargo. The combined \$627 million recovery obtained in the action is among the 20 largest securities class action recoveries in history, the largest settlement ever in a class action case asserting only claims under the Securities Act of 1933, and one of a handful of securities class action recoveries obtained where there were no parallel civil or criminal actions brought by government authorities. The firm represented Co-Lead Plaintiffs Orange County Employees Retirement System and Louisiana Sheriffs' Pension and Relief Fund in this action.

Case: *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*

Court: United States District Court for the District of Columbia

Highlights: \$612.4 million jury award for Fannie Mae and Freddie Mac investors in a unanimous trial verdict.

Summary: BLB&G secured a \$612.4 million jury award for Fannie Mae and Freddie Mac investors in a unanimous trial verdict against the Federal Housing Finance Agency (FHFA). The action challenged FHFA's decision to sweep the entire net worth of Fannie Mae and Freddie Mac to the U.S. Treasury, depriving

shareholders of significant value. The award came after two trials and 10 years of intense litigation and negotiations. The court also recently approved our request for prejudgment interest, adding approximately \$198 million to the recovery for investors (pending entry of judgment).

Case: *Bear Stearns Mortgage Pass-Through Litigation*

Court: United States District Court for the Southern District of New York

Highlights: \$500 million recovery—the largest recovery ever on behalf of purchasers of residential mortgage-backed securities.

Summary: BLB&G served as Co-Lead Counsel in this securities action, representing Lead Plaintiffs the Public Employees' Retirement System of Mississippi. The case alleged that Bear Stearns & Company sold mortgage pass-through certificates using false and misleading offering documents. The offering documents contained false and misleading statements related to, among other things, the underwriting guidelines used to originate the mortgage loans underlying the certificates and the accuracy of the appraisals for the properties underlying the certificates. After six years of hard-fought litigation and extensive arm's-length negotiations, the \$500 million recovery is the largest settlement in a U.S. class action against a bank that packaged and sold mortgage securities at the center of the 2008 financial crisis.

Case: *Gary Hefler et al. v. Wells Fargo & Company et al.*

Court: United States District Court for the Northern District of California

Highlights: \$480 million recovery—the fourth largest securities settlement ever achieved in the Ninth Circuit.

Summary: BLB&G served as Lead Counsel for the Court-appointed Lead Plaintiff Union Asset Management Holding, AG in this action, which alleged that Wells Fargo and certain current and former officers and directors of Wells Fargo made a series of materially false statements and omissions in connection with Wells Fargo's secret creation of fake or unauthorized client accounts in order to hit performance-based compensation goals. After years of presenting a business driven by legitimate growth prospects, U.S. regulators revealed in September 2016 that Wells Fargo employees were secretly opening millions of potentially unauthorized accounts for existing Wells Fargo customers. The Complaint alleged that these accounts were opened in order to hit performance targets and inflate the "cross-sell" metrics that investors used to measure Wells Fargo's financial health and anticipated growth. When the market learned the truth about Wells Fargo's violation of its customers' trust and failure to disclose reliable information to its investors, the price of Wells Fargo's stock dropped, causing substantial investor losses.

Case: *In re Kraft Heinz Securities Litigation*

Court: United States District Court for the Northern District of Illinois

Highlights: \$450 million in total recoveries.

Summary: BLB&G litigated claims against Kraft Heinz arising from the defendants' misstatements regarding the company's financial position, including the carrying value of Kraft's assets, the sustainability of Kraft's margins, and the success of recent cost-cutting strategies by the company. After overcoming defendants' motions to dismiss and conducting discovery involving the production of over 14.7 million pages of documents, the parties engaged in mediation and reached a settlement that represented a recovery of \$450 million for impacted investors.

Case: *Ohio Public Employees Retirement System v. Freddie Mac*

Court: United States District Court for the Southern District of Ohio

Highlights: \$410 million settlement.

Summary: This securities fraud class action was filed on behalf of the Ohio Public Employees Retirement System and the State Teachers Retirement System of Ohio alleging that Freddie Mac and certain of its current and former officers issued false and misleading statements in connection with the company's previously reported financial results. Specifically, the Complaint alleged that the Defendants misrepresented the company's operations and financial results by engaging in numerous improper transactions and accounting machinations that violated fundamental GAAP precepts in order to artificially smooth the company's earnings and hide earnings volatility. In connection with these improprieties, Freddie Mac restated more than \$5 billion in earnings. A settlement of \$410 million was reached in the case just as deposition discovery had begun and document review was complete.

Case: *In re Refco, Inc. Securities Litigation*

Court: United States District Court for the Southern District of New York

Highlights: Over \$407 million in total recoveries.

Summary: The lawsuit arises from the revelation that Refco, a once-prominent brokerage, had for years secreted hundreds of millions of dollars of uncollectible receivables with a related entity controlled by Phillip Bennett, the company's Chairman and Chief Executive Officer. This revelation caused the stunning collapse of the company a mere two months after its initial public offering of common stock. As a result, Refco filed one of the largest bankruptcies in U.S. history. Settlements have been obtained from multiple company and individual defendants, resulting in a total recovery for the class of over \$407 million. BLB&G represented Co-Lead Plaintiff RH Capital Associates LLC.

Case: *In re Allergan, Inc. Proxy Violation Securities Litigation*

Court: United States District Court for the Central District of California

Highlights: Recovered over \$250 million for investors while challenging an unprecedented insider trading scheme by billionaire hedge fund manager Bill Ackman.

Summary: As alleged in groundbreaking litigation, billionaire hedge fund manager Bill Ackman and his Pershing Square Capital Management fund secretly acquired a near 10% stake in pharmaceutical concern Allergan as part of an unprecedented insider trading scheme by Ackman and Valeant Pharmaceuticals International. What Ackman knew—but investors did not—was that in the ensuing weeks, Valeant would be launching a hostile bid to acquire Allergan shares at a far higher price. Ackman enjoyed a massive instantaneous profit upon public news of the proposed acquisition, and the scheme worked for both parties as he kicked back hundreds of millions of his insider-trading proceeds to Valeant after Allergan agreed to be bought by a rival bidder. After a ferocious three-year legal battle over this attempt to circumvent the spirit of the U.S. securities laws, BLB&G obtained a \$250 million settlement for Allergan investors, and created precedent to prevent similar such schemes in the future. The Plaintiffs in this action were the State Teachers Retirement System of Ohio, the Iowa Public Employees Retirement System, and Patrick T. Johnson.

Corporate Governance and Shareholders' Rights

Case: *Tornetta v. Musk*

Court: Delaware Court of Chancery

Highlights: Achieved a historic ruling rescinding Elon Musk's \$55 billion compensation package at Tesla—the largest such package in history.

Summary: BLB&G led a headline-grabbing shareholder derivative action against Elon Musk and certain Tesla board members challenging the \$55 billion compensation plan granted to Musk—the largest such compensation plan in history. BLB&G served as lead trial counsel in this case on behalf of a Tesla stockholder. The firm litigated for more than four years, examined eight of the most critical witnesses—including Elon Musk himself—and presented a strong factual record to the Court. On January 30, 2024, in a historic decision, the court nullified Musk's entire \$55 billion compensation package, finding that Tesla's board of directors had breached their fiduciary duty in structuring Musk's multi-tranched compensation.

Case: *City of Monroe Employees' Retirement System, Derivatively on Behalf of Twenty-First Century Fox, Inc. v. Rupert Murdoch, et al.*

Court: Delaware Court of Chancery

Highlights: Landmark derivative litigation established unprecedented, independent Board-level council to ensure employees are protected from workplace harassment while recouping \$90 million for the company's coffers.

Summary: Before the birth of the #metoo movement, BLB&G led the prosecution of an unprecedented shareholder derivative litigation against Fox News parent 21st Century Fox arising from the systemic sexual and workplace harassment at the embattled network. After nearly 18 months of litigation,

discovery and negotiation related to the shocking misconduct and the Board's extensive alleged governance failures, the parties unveil a landmark settlement with two key components: 1) the first ever Board-level watchdog of its kind—the "Fox News Workplace Professionalism and Inclusion Council" of experts (WPIC)—majority independent of the Murdochs, the Company and Board; and 2) one of the largest financial recoveries—\$90 million—ever obtained in a pure corporate board oversight dispute. The WPIC serves as a model for public companies in all industries. The firm represented 21st Century Fox shareholder the City of Monroe (Michigan) Employees' Retirement System.

Case: *In re McKesson Corporation Derivative Litigation*

Court: United States District Court, Northern District of California, Oakland Division and Delaware Chancery Court

Highlights: Litigation recovered \$175 million and achieved substantial corporate governance reforms.

Summary: BLB&G represented the Police & Fire Retirement System City of Detroit and Amalgamated Bank in this derivative class action arising from the company's role in permitting and exacerbating America's ongoing opioid crisis. The complaint, initially filed in Delaware Chancery Court, alleged that defendants breached their fiduciary duties by failing to adequately oversee McKesson's compliance with provisions of the Controlled Substances Act and a series of settlements with the Drug Enforcement Administration intended to regulate the distribution and misuse of controlled substances such as opioids. Even after paying fines and settlements in the hundreds of millions of dollars, McKesson was sued in the National Opioid Multidistrict Litigation. In May 2018, our clients joined a substantially similar action being litigated in California federal court. Acting as co-lead counsel, BLB&G played a major role in litigating the case, opposing a motion to stay the action by a special litigation committee, and engaging in extensive pretrial discovery. Ultimately, \$175 million was recovered for the benefit of McKesson's shareholders in a settlement that also created substantial corporate-governance reforms to prevent a recurrence of McKesson's inadequate legal compliance efforts.

Case: *UnitedHealth Group, Inc. Shareholder Derivative Litigation*

Court: United States District Court for the District of Minnesota

Highlights: Recovered over \$920 million in ill-gotten compensation directly from former officers for their roles in illegally backdating stock options, while the company agreed to far-reaching reforms aimed at curbing future executive compensation abuses.

Summary: This shareholder derivative action filed against certain current and former executive officers and members of the Board of Directors of UnitedHealth Group alleged that the Defendants obtained, approved and/or acquiesced in the issuance of stock options to senior executives that were unlawfully backdated to provide the recipients with windfall compensation at the direct expense of UnitedHealth and its shareholders. The firm recovered over \$920 million in ill-gotten compensation

directly from the former officer Defendants—the largest derivative recovery in history. As feature coverage in *The New York Times* indicated, “investors everywhere should applaud [the UnitedHealth settlement]....[T]he recovery sets a standard of behavior for other companies and boards when performance pay is later shown to have been based on ephemeral earnings.” The Plaintiffs in this action were the St. Paul Teachers’ Retirement Fund Association, the Public Employees’ Retirement System of Mississippi, the Jacksonville Police & Fire Pension Fund, the Louisiana Sheriffs’ Pension & Relief Fund, the Louisiana Municipal Police Employees’ Retirement System and Fire & Police Pension Association of Colorado.

Case: *Caremark Merger Litigation*

Court: Delaware Court of Chancery – New Castle County

Highlights: Landmark Court ruling ordered Caremark’s board to disclose previously withheld information, enjoined a shareholder vote on the CVS merger offer, and granted statutory appraisal rights to Caremark shareholders. The litigation ultimately forced CVS to raise its offer by \$7.50 per share, equal to more than \$3.3 billion in additional consideration to Caremark shareholders.

Summary: Commenced on behalf of the Louisiana Municipal Police Employees’ Retirement System and other shareholders of Caremark RX, this shareholder class action accused the company’s directors of violating their fiduciary duties by approving and endorsing a proposed merger with CVS Corporation, while refusing to fairly consider an alternative transaction proposed by another bidder. In a landmark decision, the Court ordered the Defendants to disclose material information that had previously been withheld, enjoined the shareholder vote on the CVS transaction until the additional disclosures occurred, and granted statutory appraisal rights to Caremark’s shareholders—forcing CVS to increase the consideration offered to shareholders by \$7.50 per share in cash (over \$3 billion in total).

Case: *In re Pfizer Inc. Shareholder Derivative Litigation*

Court: United States District Court for the Southern District of New York

Highlights: Landmark settlement in which Defendants agreed to create a new Regulatory and Compliance Committee of the Pfizer Board to be supported by a dedicated \$75 million fund.

Summary: In the wake of Pfizer’s agreement to pay \$2.3 billion as part of a settlement with the U.S. Department of Justice to resolve civil and criminal charges relating to the illegal marketing of at least 13 of the company’s most important drugs (the largest such fine ever imposed), this shareholder derivative action was filed against Pfizer’s senior management and Board alleging they breached their fiduciary duties to Pfizer by, among other things, allowing unlawful promotion of drugs to continue after receiving numerous “red flags” that Pfizer’s improper drug marketing was systemic and widespread. The suit was brought by Court-appointed Lead Plaintiffs Louisiana Sheriffs’ Pension and Relief Fund and Skandia Life Insurance Company, Ltd. In an unprecedented settlement reached by the parties, the Defendants agreed to create a new Regulatory and Compliance Committee of the Pfizer Board of Directors (the “Regulatory Committee”) to oversee and monitor Pfizer’s compliance and drug

marketing practices and to review the compensation policies for Pfizer's drug sales related employees.

Case: *Miller et al. v. IAC/InterActiveCorp et al.*

Court: Delaware Court of Chancery

Highlights: This litigation shut down efforts by controlling shareholders to obtain "dynastic control" of the company through improper stock class issuances, setting valuable precedent and sending a strong message to boards and management in all sectors that such moves will not go unchallenged.

Summary: BLB&G obtained this landmark victory for shareholder rights against IAC/InterActiveCorp and its controlling shareholder and chairman, Barry Diller. For decades, activist corporate founders and controllers sought ways to entrench their position atop the corporate hierarchy by granting themselves and other insiders "supervoting rights." Diller laid out a proposal to introduce a new class of non-voting stock to entrench "dynastic control" of IAC within the Diller family. BLB&G litigation on behalf of IAC shareholders ended in capitulation with the Defendants effectively conceding the case by abandoning the proposal. This became a critical corporate governance precedent, given the trend of public companies to introduce "low" and "no-vote" share classes, which diminish shareholder rights, insulate management from accountability, and can distort managerial incentives by providing controllers voting power out of line with their actual economic interests in public companies.

Case: *In re News Corp. Shareholder Derivative Litigation*

Court: Delaware Court of Chancery – Kent County

Highlights: An unprecedented settlement in which News Corp. recouped \$139 million and enacted significant corporate governance reforms that combat self-dealing in the boardroom.

Summary: Following News Corp.'s 2011 acquisition of a company owned by News Corp. Chairman and CEO Rupert Murdoch's daughter, and the phone-hacking scandal within its British newspaper division, BLB&G filed a derivative litigation on behalf of the company because of institutional shareholder concern with the conduct of News Corp.'s management. BLB&G ultimately obtained an unprecedented settlement in which News Corp. recouped \$139 million for the company coffers and agreed to enact corporate governance enhancements to strengthen its compliance structure, the independence and functioning of its board, and the compensation and clawback policies for management.

Clients and Fees

We are firm believers in the contingency fee as a socially useful, productive and satisfying basis of compensation for legal services, particularly in litigation. Wherever appropriate, even with our corporate clients, we encourage retentions in which our fee is contingent on the outcome of the litigation. This way, it is not the number of hours worked that will determine our fee, but rather the result achieved for our client. The firm generally negotiates with our clients a contingent fee schedule specific to each litigation, and all fee proposals are approved by the client prior to commencing litigation, and ultimately by the Court.

Our clients include many large and well-known financial and lending institutions and pension funds, as well as privately held companies that are attracted to our firm because of our reputation, expertise, and fee structure. Most of the firm's clients are referred by other clients, law firms and lawyers, bankers, investors, and accountants. A considerable number of clients have been referred to the firm by former adversaries. We have always maintained a high level of independence and discretion in the cases we decide to prosecute. As a result, the level of personal satisfaction and commitment to our work is high.

In the Public Interest

Bernstein Litowitz Berger & Grossmann LLP is guided by two principles: excellence in legal work and a belief that the law should serve a socially useful and dynamic purpose. Attorneys at the firm are active in academic, community, and pro bono activities and regularly participate as speakers and contributors to professional organizations. In addition, the firm endows a public interest law fellowship and sponsors an academic scholarship at Columbia Law School. Highlights of our community contributions include:

Bernstein Litowitz Berger & Grossmann Public Interest Law Fellows

BLB&G is committed to fighting discrimination and effecting positive social change. In support of this commitment, the firm donates funds to Columbia Law School to create the Bernstein Litowitz Berger & Grossmann Public Interest Law Fellowship. This fund at Columbia Law School provides Fellows with 100% of the funding needed to make payments on their law school tuition loans so long as such graduates remain in the public interest law field. BLB&G Fellows can begin their careers free of any school debt if they make a long-term commitment to public interest law.

Firm Sponsorship of Her Justice

BLB&G is a sponsor of Her Justice, a not-for-profit organization in New York City dedicated to providing pro bono legal representation to indigent women, principally vulnerable women, in connection with the myriad legal problems they face. The organization trains and supports the efforts of New York lawyers who provide pro bono counsel to these women. Several members and associates of the firm volunteer their time to help women who need divorces from abusive spouses or representation on issues such as child support, custody, and visitation. To read more about Her Justice, visit the organization's website at <http://www.herjustice.org/>.

Firm Sponsorship of City Year New York

BLB&G is an active supporter of City Year New York, a division of AmeriCorps. The program was founded in 1988 as a means of encouraging young people to devote time to public service and unites a diverse group of volunteers for a demanding year of full-time community service, leadership development, and civic engagement. Through their service, corps members experience a rite of passage that can inspire a lifetime of citizenship and build a stronger democracy.

Max W. Berger Pre-Law Program

The Max W. Berger Pre-Law Program was established at Baruch College to encourage outstanding minority undergraduates to pursue a meaningful career in the legal profession. Providing workshops, seminars, counseling, and mentoring to Baruch students, the program facilitates and guides them through the law school research and application process, and places them in appropriate internships and other pre-law working environments.

Our Attorneys

BLB&G employs a dedicated team of attorneys, including partners, counsel, associates, and senior staff attorneys. Biographies for each of our attorneys can be found on our website [here](#). On a case-by-case basis, we also make use of a pool of staff attorneys to supplement our litigation teams. The BLB&G team also includes investigators, financial analysts, paralegals, e-discovery specialists, information technology professionals, and administrative staff. Biographies for our investigative team are available on our website [here](#), and biographies for the leaders of our administrative departments are viewable [here](#).

Partners

Max Berger, Founding Partner, has grown BLB&G from a partnership of four lawyers in 1983 into what the *Financial Times* described as “one of the most powerful securities class action law firms in the United States” by prosecuting seminal cases which have increased market transparency, held wrongdoers accountable, and improved corporate business practices in groundbreaking ways.

Described by sources quoted in leading industry publication *Chambers USA* as “the smartest, most strategic plaintiffs’ lawyer [they have] ever encountered,” Max has litigated many of the firm’s most high-profile and significant cases and secured some of the largest recoveries ever achieved in securities fraud lawsuits, negotiating seven of the largest securities fraud settlements in history, each in excess of a billion dollars: *Cendant* (\$3.3 billion), *Citigroup-WorldCom* (\$2.575 billion), *Bank of America/Merrill Lynch* (\$2.4 billion), *JPMorgan Chase-WorldCom* (\$2 billion), *Nortel* (\$1.07 billion), *Merck* (\$1.06 billion), and *McKesson* (\$1.05 billion). Max’s prosecution of the *WorldCom* litigation, which resulted in unprecedented monetary contributions from WorldCom’s outside directors (nearly \$25 million out of their own pockets on top of their insurance coverage) “shook Wall Street, the audit profession and corporate boardrooms.” (*The Wall Street Journal*)

Max’s cases have resulted in sweeping corporate governance overhauls, including the creation of an independent task force to oversee and monitor diversity practices (*Texaco* discrimination litigation), establishing an industry-accepted definition of director independence, increasing a board’s power and responsibility to oversee internal controls and financial reporting (*Columbia/HCA*), and creating a Healthcare Law Regulatory Committee with dedicated funding to improve the standard for regulatory compliance oversight by a public company board of directors (*Pfizer*). His cases have yielded results which have served as models for public companies going forward.

Most recently, before the #metoo movement came alive, on behalf of an institutional investor client, Max handled the prosecution of an unprecedented shareholder derivative litigation against Fox News parent 21st Century Fox, Inc. arising from the systemic sexual and workplace harassment at the embattled network. After nearly 18 months of litigation, discovery, and negotiation related to the shocking misconduct and the Board’s extensive alleged governance failures, the parties unveiled a landmark settlement with two key components: 1) the first ever Board-level watchdog of its kind—the “Fox News Workplace Professionalism and Inclusion Council” of experts (WPIC)—majority independent of the Murdochs, the Company and Board; and 2) one of the largest financial recoveries—\$90 million—ever obtained in a pure corporate board oversight dispute. The WPIC is expected to serve as a model for public companies in all industries.

Max's work has garnered him extensive media attention, and he has been the subject of feature articles in a variety of major media publications. *The New York Times* highlighted his remarkable track record in an October 2012 profile entitled "Investors' Billion-Dollar Fraud Fighter," which also discussed his role in the *Bank of America/Merrill Lynch Merger* litigation. In 2011, Max was twice profiled by *The American Lawyer* for his role in negotiating a \$627 million recovery on behalf of investors in the *In re Wachovia Corp. Securities Litigation*, and a \$516 million recovery in *In re Lehman Brothers Equity/Debt Securities Litigation*. For his outstanding efforts on behalf of WorldCom investors, he was featured in articles in *BusinessWeek* and *The American Lawyer*, and *The National Law Journal* profiled Max (one of only eleven attorneys selected nationwide) in its annual 2005 "Winning Attorneys" section. He was subsequently featured in a 2006 *New York Times* article, "A Class-Action Shuffle," which assessed the evolving landscape of the securities litigation arena.

One of the "100 Most Influential Lawyers in America"

Widely recognized as the "Dean" of the U.S. plaintiff securities bar for his remarkable career and his professional excellence, Max has a distinguished and unparalleled list of honors to his name.

- He was selected as one of the "100 Most Influential Lawyers in America" by *The National Law Journal* for being "front and center" in holding Wall Street banks accountable and obtaining over \$5 billion in cases arising from the subprime meltdown, and for his work as a "master negotiator" in obtaining numerous multi-billion dollar recoveries for investors.
- Described as a "standard-bearer" for the profession in a career spanning nearly 50 years, he is the recipient of *Chambers USA's* award for Outstanding Contribution to the Legal Profession. In presenting this prestigious honor, *Chambers* recognized Max's "numerous headline-grabbing successes," as well as his unique stature among colleagues—"warmly lauded by his peers, who are nevertheless loath to find him on the other side of the table." Max has been recognized as a litigation "star" and leading lawyer in his field by *Chambers* since its inception.
- *Benchmark Litigation* recently inducted him into its exclusive "Hall of Fame" and named him a 2021 "Litigation Star" in recognition of his career achievements and impact on the field of securities litigation.
- Upon its tenth anniversary, *Lawdragon* named Max a "Lawdragon Legend" for his accomplishments. He was recently inducted into *Lawdragon's* "Hall of Fame." He is regularly included in the publication's "500 Leading Lawyers in America" and "100 Securities Litigators You Need to Know" lists.
- *Law360* published a special feature discussing his life and career as a "Titan of the Plaintiffs Bar," named him one of only six litigators selected nationally as a "Legal MVP," and selected him as one of "10 Legal Superstars" nationally for his work in securities litigation.
- Max has been regularly named a "leading lawyer" in the *Legal 500 US Guide* where he was also named to their "Hall of Fame" list, as well as *The Best Lawyers in America®* guide.
- Max was honored for his outstanding contribution to the public interest by Trial Lawyers for Public Justice, which named him a "Trial Lawyer of the Year" Finalist in 1997 for his work in *Roberts, et al. v. Texaco*, the celebrated race discrimination case, on behalf of Texaco's African-American employees.

Max has lectured extensively for many professional organizations and is the author and co-author of numerous articles on developments in the securities laws and their implications for public policy. He was chosen, along with

several of his BLB&G partners, to author the first chapter—“Plaintiffs’ Perspective”—of Lexis/Nexis’s seminal industry guide *Litigating Securities Class Actions*. An esteemed voice on all sides of the legal and financial markets, in 2008 the SEC and Treasury called on Max to provide guidance on regulatory changes being considered as the accounting profession was experiencing tectonic shifts shortly before the financial crisis.

Max also serves the academic community in numerous capacities. A long-time member of the Board of Trustees of Baruch College, he served as the President of the Baruch College Fund from 2015-2019 and now serves as its Chairman. In May 2006, he was presented with the Distinguished Alumnus Award for his contributions to Baruch College, and in 2019, was awarded an honorary Doctor of Laws degree at Baruch’s commencement, the highest honor Baruch College confers upon an individual for non-academic achievement. The award recognized his decades-long dedication to the mission and vision of the College, and in bestowing it, Baruch's President described Max as “one of the most influential individuals in the history of Baruch College.” Max established the Max Berger Pre-Law Program at Baruch College in 2007.

A member of the Dean's Council to Columbia Law School as well as the Columbia Law School Public Interest/Public Service Council, Max has taught Profession of Law, an ethics course at Columbia Law School, and serves on the Advisory Board of Columbia Law School’s Center on Corporate Governance. In February 2011, Max received Columbia Law School's most prestigious and highest honor, “The Medal for Excellence.” This award is presented annually to Columbia Law School alumni who exemplify the qualities of character, intellect, and social and professional responsibility that the Law School seeks to instill in its students. As a recipient of this award, Max was profiled in the Fall 2011 issue of *Columbia Law School Magazine*. Max is a member of the American Law Institute and an Advisor to its Restatement Third: Economic Torts project. Max recently endowed the Max Berger '71 Public Interest/Public Service Fellows Program at Columbia Law School. The program provides support for law students interested in pursuing careers in public service. Max and his wife, Dale, previously endowed the Dale and Max Berger Public Interest Law Fellowship at Columbia Law School and, under Max’s leadership, BLB&G also created the Bernstein Litowitz Berger & Grossmann Public Interest Law Fellowship at Columbia.

Among numerous charitable and volunteer works, Max is a significant and long-time contributor to Her Justice, a non-profit organization in New York City dedicated to providing *pro bono* legal representation to indigent women, principally survivors of intimate partner violence, in connection with the many legal problems they face. In recognition of their personal support of the organization, Max and his wife, Dale Berger, were awarded the “Above and Beyond Commitment to Justice Award” by Her Justice in 2021 for being steadfast advocates for women living in poverty in New York City. In addition to his personal support of Her Justice, Max has ensured BLB&G's long-time involvement with the organization. Max is also an active supporter of City Year New York, a division of AmeriCorps, dedicated to encouraging young people to devote time to public service. In July 2005, he was named City Year New York’s “Idealist of the Year,” for his commitment to, service for, and work in the community. A celebrated photographer, Max has held two successful photography shows that raised hundreds of thousands of dollars for City Year and Her Justice.

Education: Columbia Law School, 1971, J.D., Editor of the *Columbia Survey of Human Rights Law*; Baruch College-City University of New York, 1968, B.B.A., Accounting

Bar Admissions: New York; United States District Court for the Eastern District of New York; United States District Court for the Southern District of New York; United States Court of Appeals for the Second Circuit; United States

Scott Foglietta prosecutes securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients. As a member of the firm's case development and client advisory group, Scott advises Taft-Hartley pension funds, public pension funds, and other institutional investors on potential legal claims.

Scott was an integral member of the teams that advised the firm's clients in their prosecution of numerous significant matters, including securities class actions against *Wells Fargo* (\$480 million recovery), *Kraft Heinz* (\$450 million recovery), *Salix Pharmaceuticals* (\$210 million recovery), *Luckin Coffee* (\$175 million recovery), and *Equifax* (\$149 million recovery). Scott was also key member of the teams that evaluated and developed novel case theories or claims in several matters, including a securities class action against Willis Towers Watson, which arose from misrepresentations made in a proxy statement in connection with the merger between Willis Group and Towers Watson and was resolved for \$75 million, and an ongoing securities class action against *Perrigo* arising from misrepresentations made in connection with a tender offer for shares trading in both the United States and Israel. Scott was also a member of the teams that secured our clients' appointments as lead plaintiffs in the ongoing securities class actions against *Boeing*, *Meta Platforms*, *Seagate*, *Silvergate*, *TD Bank* and *First Horizon*, and *SVB Financial*, among others.

Scott was also a member of the team that advised one of the firm's institutional investor clients in a shareholder derivative action against the board of directors of *FirstEnergy Corp.* arising from the company's role in an egregious public corruption scandal, in which \$180 million was recovered and substantial governance reforms were obtained. Scott is routinely recognized for his outstanding legal work, including being named a "Rising Star" by *The National Law Journal* and *Law360*, and to *Benchmark Litigation's* "40 & Under" Hot List. Scott has also been named to numerous Lawdragon lists, including "500 Leading Plaintiff Financial Lawyers," "500 Leading Lawyers in America," and "Lawdragon 500 X – The Next Generation."

Before joining the firm, Scott represented institutional and individual clients in a wide variety of complex litigation matters, including securities class actions, commercial litigation, and ERISA litigation. Prior to law school, Scott earned an M.B.A. in finance from Clark University and worked as a capital markets analyst for a boutique investment banking firm.

Education: Brooklyn Law School, 2010, J.D. Clark University, Graduate School of Management, 2007, M.B.A., Finance; Clark University, 2006, B.A., *cum laude*, Management

Bar Admissions: New York; New Jersey; United States District Court for the Southern District of New York; United States District Court for the Eastern District of New York; United States District Court for the District of New Jersey

John Rizio-Hamilton is a member of the Firm's Executive Committee and Co-Head of BLB&G's Securities Litigation Department. One of America's top shareholder litigators, John has recovered billions of dollars for investors. Highlights of John's experience include the following:

- Led the trial team that recovered \$240 million in the *Signet Jewelers Securities Litigation*, a landmark case that marks the first successful resolution of a securities fraud class action based on allegations of sexual harassment.
- Led the trial team that recovered \$120 million in *Camelot Event Driven Fund v. Morgan Stanley & Co. LLC, et al.* This action arose from a concealed conflict of interest related to the infamous Archegos hedge fund, resulting in the second-largest recovery ever in state court for a Securities Act claim.
- Key part of the trial team that prosecuted the *Bank of America Securities Litigation*, which settled for \$2.425 billion. This is the largest securities class action recovery related to the subprime meltdown, and one of the top securities litigation recoveries in history.
- Served as counsel on behalf of the institutional investor plaintiffs in the *Citigroup Bond Litigation*, which settled for \$730 million. This is the second largest recovery ever in a securities class action brought on behalf of purchasers of debt securities.
- Member of the team that prosecuted the *Wachovia Corp. Bond/Notes Litigation*, in which the firm recovered \$627 million, one of the 15 largest securities class action recoveries in history.
- Key member of the team that recovered \$150 million for investors in the *JPMorgan Chase & Co. Securities Litigation*, a securities fraud class action arising out of the trading activities of the so-called "London Whale."

In addition to his direct litigation responsibilities, John is responsible for the firm's client outreach in Canada, where he advises institutional investor clients on potential securities fraud and investor claims.

For his remarkable accomplishments, John was named a "Litigation Trailblazer" by *The National Law Journal*. He has been recognized as a "Litigation Star" by *Benchmark Litigation*, and by Law360 as a "Rising Star," a "Legal MVP," and one of the country's "Top Attorneys Under 40."

Before joining BLB&G, John clerked for the Honorable Chester J. Straub of the United States Court of Appeals for the Second Circuit, and the Honorable Sidney H. Stein of the United States District Court for the Southern District of New York.

Education: Brooklyn Law School, 2004, J.D., *summa cum laude*, Editor-in-Chief of the Brooklyn Law Review; first-place winner of the J. Braxton Craven Memorial Constitutional Law Moot Court Competition; Johns Hopkins University, 1997, B.A., with honors

Bar Admissions: New York; United States District Court for the Southern District of New York; United States District Court for the Eastern District of New York; United States Court of Appeals for the First Circuit; United States Court of Appeals for the Second Circuit; United States Court of Appeals for the Third Circuit; United States Court of Appeals for the Fourth Circuit; United States Court of Appeals for the Fifth Circuit; United States Court of Appeals for the Ninth Circuit

Katie Sinderson, a BLB&G partner, focuses her practice on advising and representing the firm's institutional investor clients in securities fraud class actions. With more than 18 years of practice experience, she has led litigation teams that have recovered billions of dollars for investors harmed by corporate fraud and malfeasance. She practices out of the firm's New York office.

Katie played a key role in two of the firm's largest cases, both of which settled near trial for billions of dollars on behalf of investors:

- *In re Bank of America Securities Litigation*: Katie was an integral member of the trial team that prosecuted the securities fraud action against Bank of America related to the company's acquisition of Merrill Lynch & Co., achieving a recovery of \$2.425 billion—one of the top seven U.S. securities class action recoveries of all time.
- *In re Merck Securities Litigation*: Katie was a leader of the trial team that achieved a \$1.062 billion recovery in the action arising from Merck's marketing of the recalled drug Vioxx—one of the top 13 U.S. securities class action recoveries of all time.

Her recent significant litigation wins include:

- *In re Kraft Heinz Securities Litigation*: Leading the team that recovered \$450 million in the securities class action involving Kraft Heinz and Brazilian private equity firm 3G Capital.
- *In re Washington Mutual, Inc., Securities Litigation*: Leading the prosecution against Washington Mutual and certain of its former officers and directors for alleged fraudulent conduct in the company's home lending operations, an action which was resolved for \$216.75 million.
- *In re Wilmington Trust Securities Litigation*: Serving as lead partner in the securities class action arising from the failure of major mid-Atlantic bank Wilmington Trust, achieving a \$210 million recovery.
- *In re Salix Pharmaceuticals, Ltd. Securities Litigation*: Obtaining a \$210 million recovery for investors in the securities fraud class action against Salix Pharmaceuticals arising from misrepresentations concerning the wholesaler inventory levels of several of Salix's most successful products.
- *San Antonio Fire and Police Pension Fund et al. v. Dole Food Co. et al.*: Resolving an innovative case on behalf of sellers of Dole Food securities, where plaintiffs alleged that Dole's CEO issued misrepresentations to drive the price of the company down in order to take the company private on the cheap. BLB&G resolved the Dole case for \$74 million.

In addition to her litigation responsibilities, Katie co-chairs the Federal Bar Council Securities Litigation Committee. She is also committed to educating clients and the greater investment and legal communities on topics related to securities litigation and women in law. She has served as a guest lecturer at Columbia University and regularly speaks at Practicing Law Institute's "Expert Witness" programs, among other webinars, seminars, and conferences.

Katie is widely recognized in the market for her litigation work. In 2024, Chambers ranked Katie as one of the top plaintiff securities litigators in New York. She has been named a "Litigation Trailblazer" by *The National Law Journal*, a "Next Generation Partner" by *The Legal 500*, a "Titan of the Plaintiffs Bar" and "Rising Star" by *Law360*, a "Rising Star" by the *New York Law Journal*, and a "Future Star" by *Benchmark Litigation*. For six straight years, Katie was

named to *Benchmark Litigation's* "40 & Under List." In 2024, Lawdragon named Katie one of the "500 Leading Lawyers in America," and the publication regularly lists Katie as a "Leading Plaintiff Financial Lawyer." She is regularly selected as a New York "Rising Star" by Thomson Reuters' *Super Lawyers*.

Katie received her J.D., *cum laude*, from the Georgetown University Law Center, where she was a Dean's Scholar Full Scholarship Award recipient and served as Articles Editor for The Georgetown Journal of Gender and the Law. She received her B.A., *cum laude*, from Baylor University, where she received the Regents Full Scholarship Award.

Education: Georgetown University Law Center, 2006, J.D., *cum laude*, Dean's Scholar Full Scholarship Award Recipient; Articles Editor for The Georgetown Journal of Gender and the Law; Baylor University, 2002, B.A., *cum laude*, Regents Full Scholarship Award Recipient

Bar Admissions: New York; United States District Court for the Southern District of New York; United States District Court for the Southern District of Texas; United States District Court for the Western District of Wisconsin; United States Court of Appeals for the Second Circuit; United States Court of Appeals for the Third Circuit; United States Court of Appeals for the Fifth Circuit

Senior Counsel

Alec Coquin practices out of the firm's New York office, where he primarily prosecutes securities fraud and shareholder rights litigation on behalf of the firm's institutional clients. Alec is currently a member of the teams prosecuting *Camelot Event Driven Fund v. Morgan Stanley* and *City of Miami Fire Fighters' and Police Officers' Retirement Trust v. Cerence Inc.*

Alec comes to BLB&G with nearly a decade of experience representing shareholders in complex litigation, most recently practicing at one of the nation's leading securities litigation firms. Alec has supported teams that helped investors recover hundreds of millions of dollars in securities class actions during his career.

Alec received his J.D. from St. John's University School of Law, *cum laude*, where he served as the Associate Managing Editor of the St. John's Law Review, and his B.A. from Wesleyan University.

Education: St. John's University School of Law, 2014, J.D. Wesleyan University, 2008, B.A.

Bar Admissions: New York Supreme Court, Appellate Division, Second Department; U.S. District Court for the Southern District of New York; U.S. District Court for the Eastern District of New York; U.S. District Court for the Eastern District of Michigan; U.S. Court of Appeals for the Second Circuit; U.S. Court of Appeals for the Ninth Circuit

David Duncan's practice concentrates on the settlement of class actions and other complex litigation and the administration of class action settlements.

Prior to joining BLB&G, David worked as a litigation associate at Debevoise & Plimpton, where he represented clients in a wide variety of commercial litigation, including contract disputes, antitrust and products liability litigation, and in international arbitration. In addition, he has represented criminal defendants on appeal in New York State courts and has successfully litigated on behalf of victims of torture and political persecution from Sudan, Côte d'Ivoire and Serbia in seeking asylum in the United States.

While in law school, David served as an editor of the *Harvard Law Review*. After law school, he clerked for Judge Amalya L. Kearsse of the U.S. Court of Appeals for the Second Circuit.

Education: Harvard Law School, 1997, J.D.; *magna cum laude*; Harvard College, 1993, A.B., *magna cum laude*, Social Studies

Bar Admissions: New York; Connecticut; United States District Court for the Southern District of New York

Associates

Brittney Balser is a BLB&G associate prosecuting securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients. As a core member of the firm's case development and client advisory group, Brittney counsels public pension funds and other institutional investors on potential legal claims. She practices out of the firm's New York office.

In addition to her litigation and client advisory work, Brittney is a member of the firm's Diversity Committee, as well as a member of Beyond #MeToo: A Working Group on Corporate Governance, Compliance, and Risk. Comprised of diversity and inclusion experts, litigators, and academics, Beyond #MeToo is dedicated to understanding the root causes of workplace harassment, discrimination, and misconduct and making corporate America a better and more inclusive place to work.

A thought leader in the field, Brittney regularly speaks at conferences and seminars on topics related to securities litigation and corporate governance. Most recently, she co-presented "Auditors at the Gate: Whose Interests Are They Protecting" at the 2025 PAPERS Spring Forum, examining the evolving role of the independent auditor in capital markets. Her insights have also been published in *The Review of Securities & Commodities Regulation* and the *New York Law Journal*.

Prior to joining the firm, Brittney was an associate at Bracewell LLP, where she practiced broad-based litigation, including white collar defense, internal investigations, civil litigation, and FINRA arbitrations. She is a graduate of Notre Dame Law School, where she was president of the International Law Society and served as the Managing Notes Editor for the *Journal of Legislation*. She received her B.A. in Political Science from Duke University, where she was a member of the varsity volleyball team.

Education: Notre Dame Law School, 2018, J.D., *cum laude*, Dean's List; Duke University, 2015, B.A., Political Science

Bar Admissions: New York; U.S. District Court for the Eastern District of New York; U.S. District Court for the Southern District of New York

Jimmy Brunetto is a BLB&G associate prosecuting securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients. He practices out of the firm's New York office.

As a member of the firm's case development and client advisory group, Jimmy works as part of a team of attorneys, financial analysts, and investigators to counsel public pension funds and other institutional investors on potential legal claims.

Jimmy contributes to ongoing legal discourse on topics related to his practice areas. Most recently, he co-authored “The SEC’s New Cybersecurity Disclosure Rules Decoded: What They Mean for Investors,” published in *Reuters*.

Prior to joining the firm, Jimmy investigated and prosecuted securities fraud at the New York State Office of the Attorney General’s Investor Protection Bureau, where he worked on several high-profile matters. In recognition for his contributions as part of a federal and state working group that investigated and prosecuted securities fraud in connection with the issuance and sale of residential mortgage-backed securities, Jimmy was awarded the Louis J. Lefkowitz Award for outstanding performance.

Jimmy received his J.D. from New York Law School, where he was honored as a John Marshall Harlan Scholar and served as a Staff Editor of the *New York Law School Law Review*. He holds both a B.S. in Finance and a B.A. in Political Science from the University of Florida.

Education: New York Law School, 2011, J.D., *cum laude*, John Marshall Harlan Scholar; Staff Editor, New York Law School Law Review; University of Florida, 2007, B.A., *cum laude*, Political Science; University of Florida, 2007, B.S.B.A, Finance

Bar Admissions: New York; U.S. District Court for the Eastern District of New York; U.S. District Court for the Southern District of New York

Andrea Dorado [Former Associate] practiced out of the New York office prosecuting securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm’s institutional investor clients.

She was a member of the firm’s case development and client advisory group, in which she, as part of a team of attorneys, financial analysts, and investigators, counseled public pension funds and other institutional investors on potential legal claims.

Prior to joining BLB&G, Andrea was an Antitrust and Consumer Products Associate at Milberg Coleman Bryson Phillips Grossman PLLC. There, she represented plaintiffs in multidistrict class action litigation concerning a variety of antitrust and consumer protection matters, including, products liability, monopolization, restraint of trade, tying, and allegations of unfair competition.

Andrea received her J.D. from Benjamin N. Cardozo School of Law, where she served as the Associate Editor of the *Cardozo Arts and Entertainment Law Journal*, assisted asylum seekers at Sanctuary for Families, co-founded Cardozo’s own Women in Tech Law chapter, interned at the New York State Department of Financial Services, and clerked for KBL Roche representing video game developers. Andrea graduated from Boston College with a B.A. in Linguistics and a minor in International Affairs and French.

Education: Boston College, 2014, B.A., Linguistics; Benjamin N. Cardozo School of Law, 2021, J.D.

Bar Admissions: New York

Abby Kritta, an associate in BLB&G’s securities litigation practice, prosecutes securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm’s institutional investor clients. Abby practices out of the firm’s New York office. Prior to joining BLB&G, Abby was an associate in the dispute resolution practice at Freshfields, where she represented clients on a range of multijurisdictional matters, including commercial litigation, securities litigation,

and white-collar investigations. Abby received her J.D., *cum laude*, from Boston College Law School. She received her B.S., with distinction, from the University of Michigan.

Education: Boston College Law School, 2022, J.D., *cum laude*; University of Michigan, 2018, B.S., with Honors, James B. Angell Scholar, English

Bar Admissions: New York

Nicole Santoro [Former Associate] practiced out of the firm's New York office, where she prosecuted securities fraud and shareholder rights litigation on behalf of the firm's institutional investor clients. Nicole was a member of the team that achieved a \$450 million settlement for investors in *In re Kraft Heinz Securities Litigation*.

Prior to joining BLB&G, Nicole served as a law clerk for the Honorable Andrew P. Gordon of the U.S. District Court for the District of Nevada. During law school, she worked as an intern for the U.S. Attorney's Office for the District of Nevada and as a summer associate at a prominent plaintiffs' employment law firm. Prior to attending law school, Nicole worked as a compliance investigator in the fraud unit of the Office of the Nevada Attorney General.

Education: Columbia University, B.A., 2015, Kluge Scholar; Stanford Law School, J.D., 2020, Member Editor, *Stanford Environmental Law Journal*.

Bar Admissions: New York, Colorado

Sarah Schmidt prosecutes securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients. She practices out of the firm's New York office.

Prior to joining BLB&G, Sarah served as a judicial clerk for the Honorable Judge E. Grady Jolly of the U.S. Court of Appeals for the Fifth Circuit. She also worked as a summer associate and as a paralegal at top global law firms.

Sarah received her J.D. from the Georgetown University Law Center, graduating *magna cum laude* and serving as Executive Editor of the American Criminal Law Review. She graduated *magna cum laude* from Boston College with a B.A. in Political Science.

Education: Georgetown University Law Center, 2022, J.D., *magna cum laude*; Boston College, 2016, B.A., Political Science

Bar Admissions: New York

Thomas Sperber is an associate practicing out of the New York office prosecuting securities fraud, corporate governance, and shareholder rights litigation on behalf of the firm's institutional investor clients.

Recognized for his exceptional work in the practice area of securities litigation, Thomas was named a "Rising Star" by respected peer-review publication *Super Lawyers*.

Prior to joining the firm, Thomas was a law clerk for the Honorable K. Michael Moore, Chief Judge of the United States District Court for the Southern District of Florida. He is a graduate of Fordham University School of Law, where he was an associate editor of the *Fordham Law Review*.

Education: Fordham University School of Law, 2018, J.D., Associate Editor, Fordham Law Review; Binghamton University - State University of New York, 2014, B.A.

Bar Admissions: New York

Senior Staff Attorneys

Andrew Boruch is a senior staff attorney practicing out of the firm's New York office in the securities litigation department.

Prior to joining the firm, Andrew was an associate at DLA Piper. Andrew is a graduate of the NYU School of Law, where he was a senior member of the Journal of Legislation and Public Policy and was a clinical intern at the Civil Litigation Clinic for the US Attorney's Office for the Southern District of New York.

He graduated *magna cum laude* from The Ohio State University where he received his Bachelor of Arts degree in Political Science.

Education: New York University School of Law, 2007, J.D., Journal of Legislation and Public Policy Honors; The Ohio State University, 2004, B.A., *magna cum laude*

Bar Admissions: New York

Danielle Disporto is a senior staff attorney practicing out of the New York office in the securities litigation department. She represents the firm's institutional investor clients in securities fraud-related matters.

Prior to joining the firm, Danielle worked as an associate at two plaintiffs' firms in New York, where she practiced class action litigation. Danielle graduated *cum laude* from Seton Hall University School of Law.

She received a Bachelor of Science in Business Administration from the University of Delaware.

Education: Seton Hall University School of Law, 2003, J.D., *cum laude*; University of Delaware, 1998, B.S., Business Administration

Bar Admissions: New York; United States District Court for the Southern District of New York; New Jersey; United States District Court for the District of New Jersey

Jared Hoffman is a senior staff attorney specializing in class action securities litigation and corporate governance matters.

Prior to joining the firm, he worked as a corporate associate at Blank Rome LLP (NYC) and corporate associate at Sichenzia Ross Friedman Ference LLP (NYC).

He graduated from New York University School of Law where he also served as Executive Editor of the Journal of Legislation and Public Policy.

Education: New York University School of Law, 2005, J.D.; Emory University, 2002, B.B.A

Bar Admission: New York

Juan Lossada is a senior staff attorney practicing out of the Los Angeles office. Since joining the firm, he has focused on the prosecution of securities fraud class actions including *Impinj*, *Symantec*, *Mattel*, *Oracle*, *Solar Winds*, *Meta Platforms* and *Wells Fargo* (2020 case).

Prior to joining the firm, Juan worked as a commercial litigation associate and has also practiced at various other law firms.

Juan received his J.D. from the University of Southern California, Gould School of Law and his B.S. in Biology from the University of Southern California.

Education: University of Southern California, Gould School of Law, J.D., Staff Editor for the *Southern California Law Review*; Judicial Law Clerk Externship, California Court of Appeal, 2nd Dist. University of Southern California, B.S., Biology

Bar Admissions: California; United States District Court for the Central District of California

Larry Hosmer is a senior staff attorney in the New York* office, and primarily provides electronic discovery assistance and support in the litigation of securities fraud-related matters.

Prior to joining the firm, Larry had a private litigation practice in Dallas, Texas, and from there went on to focus in the growing electronic discovery field. Larry is a graduate of the SMU School of Law, where he was an Articles Editor of the *International Lawyer* law review. He was a National Merit Scholar at the University of Texas at Austin, where he graduated with a Bachelor of Arts degree in history.

**Not admitted to practice in New York.*

Education: Southern Methodist University School of Law, 1996, J.D.; University of Texas at Austin, 1993, B.A.

Bar Admissions: Texas

Young O. Lee is a senior staff attorney practicing out of the firm's New York office in the securities litigation department.

Young has worked on some of BLB&G's most significant cases, including *In re Welldyne RX Inc.*, *In re iRhythm Technologies, Inc.*, *In re Turquoise Hill Resources Ltd. Securities Litigation*, *In re Musk et al.*, *In re Allianz Global Investors U.S. LLC Alpha Series Litigation*, and *In re New Oriental Education & Technology Group Inc. Securities Litigation*.

Prior to joining the firm, Young worked as an attorney at a large law firm on a team which obtained dismissal of all claims on summary judgment for a multinational investment bank in the *In re Enron Corp. Securities Litigation*, and as a Staff Attorney at Paul Weiss, stationed in Tokyo, Hong Kong, and New York, handling complex civil litigation and regulatory investigations.

Young received her J.D. from the University of Maryland School of Law and holds an A.B. in English & American Literature from Harvard University.

Education: University of Maryland School of Law, 1995, J.D.; Harvard University, B.A., English & American Literature

Bar Admissions: Illinois

Staff Attorneys

Daniel K. Ackeret [Former Staff Attorney] worked on *In re Five Below, Inc. Securities Litigation* and *Glazing Employers and Glaziers' Union Local #27 Pension and Retirement Fund v. iRhythm Technologies, Inc., et al.* at BLB&G.

Before joining the firm, Daniel was a contract attorney at Cadence Counsel, where he worked on several class action cases involving antitrust, IP infringement, competition law, and breach-of-contract matters.

Education: Northern Kentucky University, B.S., 2010. Case Western Reserve University School of Law, J.D., 2015

Bar Admission: Ohio

Randall Hirsch, M.D. joined the BLB&G Staff Attorney team in February 2023 and worked on *In re Five Below, Inc. Securities Litigation*; *In re Inspire Medical Systems, Inc. Securities Litigation*; *Glazing Employers and Glaziers' Union Local #27 Pension and Retirement Fund v. iRhythm Technologies, Inc., et al.*; *Dhimant Patel, et al. v. Edwards Lifesciences Corporation, Bernard J. Zovighian, Larry L. Wood, and Scott B. Ullem Corporation*; *In re Mylan, N.V. Securities Litigation*; and *In re The Boeing Company Aircraft Securities Litigation*.

Prior to joining the firm, Randall was an Associate with Flomenhaft Law Firm and Wiesner Law Firm, focused on personal injury/medical malpractice plaintiff litigation, and at Willkie Farr & Gallagher LLP, focused on transactional law. Previously, Randall worked at Abbott Laboratories as a Post-marketing Pharmacovigilance Analyst and was an Emergency Medicine Resident with the William Beaumont Hospital.

Education: University of Michigan, B.A., 1997. Tufts University School of Medicine, M.D., 2001. Northwestern University School of Law, J.D., 2008

Bar Admission: New York; New Jersey; Illinois. US Patent and Trademark Office (USPTO)

Yihong (Andrew) Huang has worked on *Mehlman et al v. Ameriprise Financial, Inc. et al.*; *In re Wells Fargo Cash Sweep Litigation*; *In re Thoughtworks Holding, Inc.*; and *Glazing Employers and Glaziers' Union Local #27 Pension and Retirement Fund v. iRhythm Technologies, Inc., et al.*

Prior to joining the firm, Andrew served as a staff attorney at Bleichmar Fonti & Auld LLP, where he handled multiple security litigation cases.

Education: University of Missouri, Kansas City School of Law J.D., 2011, and LLM 2008. Peking University/Tokyo University School of Law, Master of Law, 2007. Xiamen University, BA, Accounting and Finance, and Minor in Japanese, 2004

Bar Admission: California

Exhibit 8

EXHIBIT 8

Glazing Employers & Glaziers' Union Local #27 Pension & Retirement Fund
v. iRhythm Technologies, Inc, Case No. 3:24-cv-706-JSC (N.D. Cal.)

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP**EXPENSES BY CATEGORY**

| CATEGORY | AMOUNT |
|-------------------------------|---------------------|
| Court Fees | \$2,701.00 |
| Service of Process | \$2,733.80 |
| Factual Research | \$31,747.65 |
| Legal Research | \$44,795.50 |
| Postage & Express Mail | \$415.61 |
| Document Hosting & Management | \$6,098.52 |
| Local Transportation | \$3,813.36 |
| Out-of-Town Travel | \$14,380.15 |
| Working Meals | \$3,701.96 |
| Court Reporting & Transcripts | \$38,619.90 |
| Experts & Consultants | \$450,926.25 |
| Independent Witness Counsel | \$17,051.25 |
| Mediation Fees | \$55,950.00 |
| | |
| TOTAL: | \$672,934.95 |

Exhibit 9

EXHIBIT 9

*Glazing Employers & Glaziers' Union Local #27 Pension
& Retirement Fund v. iRhythm Technologies, Inc. ,
Case No. 3:24-cv-706-JSC (N.D. Cal.)*

**BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
DETAILED EXPENSE REPORT**

| Type of Expense | Date | Expense Amount |
|--|------------|-------------------|
| Type of Expense - Court Fees | | |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees; 2024-02-06 Filing fee for initial complaint | 02/06/2024 | \$405.00 |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees; (2447-001) John Rizio-Hamilton pro hac vice application fee | 05/16/2024 | \$328.00 |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees; Katherine Sinderson pro hac vice application fee | 05/28/2024 | \$328.00 |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees; Nicole Santoro pro hac vice applicaton fee | 06/26/2024 | \$328.00 |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees; Brittney Balser pro hac vice application fee | 12/13/2024 | \$328.00 |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees; Tom Sperber pro hac vice application fee | 02/25/2025 | \$328.00 |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees - Abby Kritta pro hac vice application fee | 07/01/2025 | \$328.00 |
| AMEX. US DISTRICT COURT ND SAN FRANCISCO CA; Court Fees; Alec Coquin pro hac vice application fee | 03/03/2026 | \$328.00 |
| Total Court Fees | | \$2,701.00 |
| Type of Expense - Service of Process | | |
| Check issued to Serving by Irving iRhythm Check No. 39356 Date: 03/06/24 | 03/06/2024 | \$350.50 |
| Check issued to Middlesex Constable Service Check No. 42194 Date: 09/24/25 | 09/24/2025 | \$95.68 |
| Check issued to Comprehensive Investigation Services PLLC Check No. 42176 Date: | 09/24/2025 | \$189.25 |
| Check issued to Middlesex Constable Service Check No. 42268 Date: 10/08/25 Check No. 42267 Date: 10/08/25 | 10/08/2025 | \$130.37 |

| Type of Expense | Date | Expense Amount |
|--|------------|-------------------|
| Check issued to Same Day Process Service Inc
Check No. 42277 Date: 10/08/25 Check No.
42275 Date: 10/08/25 | 10/08/2025 | \$142.00 |
| Check issued to Blue Moon Legal Check No.
42335 Date: 10/22/25 | 10/22/2025 | \$164.25 |
| AMEX. NORCAL COURIER AND L SAN
FRANCISCO CA; 04; Process service fee | 11/01/2025 | \$125.00 |
| Check issued to Ronald R. Ezell Check No.
42536 Date: 12/03/25 | 12/03/2025 | \$110.00 |
| Check issued to Nationwide Legal, LLC
Check No. 42535 Date: 12/03/25 | 12/03/2025 | \$545.50 |
| Check issued to Same Day Process Service Inc
Check No. 42658 Date: 01/14/26 | 01/14/2026 | \$142.00 |
| Check issued to Quality Process Servers
Check No. ACH-20260225-14 Date: 02/25/26 | 02/25/2026 | \$223.50 |
| Check issued to Same Day Process Service Inc
Check No. 42833 Date: 04/01/26 | 04/01/2026 | \$515.75 |
| Total Service of Process | | \$2,733.80 |
| | | |
| Type of Expense - Factual Research | | |
| AlphaSense Inc, Invoice #INV-213401 | 06/14/2023 | \$3.27 |
| Refinitiv US LLC, Check No. 38372 Date:
09/13/23 | 09/13/2023 | \$9,639.90 |
| AlphaSense Inc, Invoice #INV-213403 | 11/01/2023 | \$1.09 |
| Refinitiv US LLC, Check No. 38846 Date:
12/06/23 | 12/06/2023 | \$69.65 |
| PACER Service Center, Check No. 39106
Date: 01/24/24 | 01/24/2024 | \$2.90 |
| Food and Drug Administration, Check No.
39553 Date: 04/10/24 | 04/10/2024 | \$130.50 |
| PACER Service Center, Check No. 39662
Date: 04/23/24 | 04/23/2024 | \$29.30 |
| Food and Drug Administration, Check No.
39862 Date: 06/05/24 | 06/05/2024 | \$1,160.00 |
| AlphaSense Inc, Invoice #INV-226185 | 06/05/2024 | \$2.18 |
| Refinitiv US LLC, Check No. 40012 Date:
07/03/24 | 07/03/2024 | \$625.83 |
| Refinitiv US LLC, Check No. 40012 Date:
07/03/24 | 07/03/2024 | \$1,311.32 |
| Refinitiv US LLC, Check No. 40043 Date:
07/10/24 | 07/10/2024 | \$725.92 |
| PACER Service Center Check No. 40113 Date:
07/24/24 Check No. 40123 Date: 07/24/24
Check No. 40113 Date: 07/24/24 | 07/24/2024 | \$27.60 |
| Check issued to Refinitiv US LLC, Check No.
40115 Date: 07/24/24 Check No. 40125 Date:
07/24/24 Check No. 40115 Date: 07/24/24 | 07/24/2024 | \$166.19 |

| Type of Expense | Date | Expense Amount |
|---|------------|----------------|
| Bureau of National Affairs, Check No. 40167
Date: 08/13/24 Check No. 40167 Date:
08/13/24 | 08/13/2024 | \$1,236.89 |
| Court Alert.com Inc, Check No. 40225 Date:
08/20/24 | 08/20/2024 | \$14.71 |
| Court Alert.com Inc, Check No. 40341 Date:
09/18/24 | 09/18/2024 | \$27.56 |
| PACER Service Center, Check No. 40536
Date: 10/23/24 | 10/23/2024 | \$86.00 |
| Refinitiv US LLC, Check No. W102324E Date:
10/23/24 | 10/23/2024 | \$5,004.71 |
| Refinitiv US LLC, Check No. W102324F Date:
10/23/24 | 10/23/2024 | \$583.30 |
| Bureau of National Affairs, Invoice 6888464136 | 11/06/2024 | \$1,236.89 |
| Court Alert.com Inc, Check No. 40827 Date:
12/18/24 | 12/18/2024 | \$94.65 |
| Refinitiv US LLC, Check No. 40850 Date:
12/18/24 | 12/18/2024 | \$2.78 |
| AlphaSense Inc, Invoice #INV-226187 | 01/08/2025 | \$17.42 |
| PACER Service Center, Check No. 40954
Date: 01/15/25 | 01/15/2025 | \$19.70 |
| Court Alert.com Inc, Check No. 40977 Date:
01/22/25 | 01/22/2025 | \$12.73 |
| Court Alert.com Inc, Check No. 41266 Date:
03/26/25 | 03/26/2025 | \$13.02 |
| Court Alert.com Inc, Check No. 41304 Date:
04/02/25 | 04/02/2025 | \$8.49 |
| Bureau of National Affairs, Check No. 41413
Date: 04/23/25 | 04/23/2025 | \$1,236.89 |
| PACER Service Center, Check No. 41471
Date: 04/30/25 | 04/30/2025 | \$60.30 |
| Court Alert.com Inc, Check No. 41563 Date:
05/21/25 | 05/21/2025 | \$14.32 |
| Themis Solutions (USA) Inc., Check No. 41589
Date: 05/21/25 | 05/21/2025 | \$35.95 |
| Court Alert.com Inc, Check No. 41810 Date:
07/09/25 | 07/09/2025 | \$12.24 |
| Bureau of National Affairs, Check No. 41872
Date: 07/16/25 Check No. 41842 Date:
07/16/25 | 07/16/2025 | \$1,236.89 |
| Court Alert.com Inc, Check No. 41883 Date:
07/23/25 | 07/23/2025 | \$37.53 |
| PACER Service Center, Check No. 41932
Date: 07/30/25 | 07/30/2025 | \$56.70 |
| Court Alert.com Inc, Check No. 41994 Date:
08/20/25 Check No. 41992 Date: 08/20/25 | 08/20/2025 | \$18.61 |
| Bloomberg Finance LP, Check No. 42296 Date:
10/15/25 | 10/15/2025 | \$1,236.89 |
| Court Alert.com Inc, Check No. 42340 Date:
10/22/25 | 10/22/2025 | \$22.44 |

| Type of Expense | Date | Expense Amount |
|--|------------|----------------|
| PACER Service Center, Check No. 42396
Date: 10/29/25 | 10/29/2025 | \$70.70 |
| Court Alert.com Inc, Check No. 42478 Date:
11/19/25 | 11/19/2025 | \$41.87 |
| Court Alert.com Inc, Check No. 42627 Date:
01/07/26 | 01/07/2026 | \$8.20 |
| Bureau of National Affairs, Check No. ACH-
20260121-4A Date: 01/21/26 Check No. ACH-
20260209-218 Date: 01/21/26 Check No. ACH-
2026121-4A Date: 01/21/26 | 01/21/2026 | \$1,536.89 |
| AMEX. ITHAKA-JSTOR JPASS NEW YORK
NY; On-Line Research Services; ITHAKA-
JSTOR JPASS - research article | 01/27/2026 | \$19.50 |
| AMEX. ELSEVIER ST LOUIS US; On-Line
Research Services; ELSEVIER - research
article | 01/27/2026 | \$30.43 |
| AMEX. ELSEVIER ST LOUIS US; On-Line
Research Services; ELSEVIER - research
article | 01/27/2026 | \$30.43 |
| AMEX. ELSEVIER ST LOUIS US; On-Line
Research Services; ELSEVIER - research
article | 01/27/2026 | \$30.43 |
| AMEX. INFORMA UK (DBA TAYL SARASOTA
FL; On-Line Research Services; INFORMA UK -
research article | 01/28/2026 | \$60.97 |
| PACER Service Center, Check No. 42689
Date: 01/28/26 | 01/28/2026 | \$40.80 |
| Court Alert.com Inc, Check No. 42742 Date:
02/18/26 | 02/03/2026 | \$94.65 |
| AMEX. JOURNALS 800-621-8335 IL; On-Line
Research Services; JOURNALS - purchase of a
journal article for our class certification reply in
iRhythm | 02/04/2026 | \$48.99 |
| Court Alert.com Inc, Check No. 42803 Date:
03/18/26 | 03/18/2026 | \$95.06 |
| Court Alert.com Inc., Check No. ACH-
20260422-41 Date: 04/22/26 | 04/22/2026 | \$8.07 |
| Bureau of National Affairs, Check No. ACH-
20260429-27 Date: 04/29/26 | 04/29/2026 | \$1,536.89 |
| PACER Service Center Check No. 42868 Date:
04/22/26 | 04/29/2026 | \$76.60 |
| Themis Solutions (USA) Inc., Check No. ACH-
20260617-28 Date: 06/17/26 | 06/17/2026 | \$72.20 |
| Bureau of National Affairs, Check No. ACH-
20260722-5 Date: 07/22/26 | 07/22/2026 | \$1,536.89 |
| Court Alert.com Inc, Check No. ACH-
20260722-17 Date: 07/22/26 | 07/26/2026 | \$64.42 |
| PACER Service Center Check No. 42957 Date:
07/29/26 Check No. 42957 Date: 07/29/26 | 07/29/2026 | \$91.40 |

| Type of Expense | Date | Expense Amount |
|---|------------|--------------------|
| Food and Drug Administration, Check No. 42970 Date: 08/12/26 | 08/12/2026 | \$29.00 |
| Total Factual Research | | \$31,747.65 |
| Type of Expense - Legal Research | | |
| Relx Inc DBA LexisNexis, Check No. 38250 Date: 08/16/23 Check No. 38249 Date: 08/16/23 | 08/16/2023 | \$2.94 |
| Thomson Reuters, Check No. 38410 Date: 09/20/23 | 09/20/2023 | \$37.31 |
| Thomson Reuters, Check No. 38410 Date: 09/20/23 | 09/20/2023 | \$1,513.13 |
| Thomson Reuters, Check No. 38557 Date: 10/18/23 | 10/18/2023 | \$140.61 |
| Relx Inc DBA LexisNexis, Check No. 38795 Date: 11/29/23 | 11/22/2023 | \$2.80 |
| Thomson Reuters, Check No. 39672 Date: 04/23/24 | 04/23/2024 | \$94.50 |
| Relx Inc DBA LexisNexis Check No. 39982 Date: 06/26/24 | 06/26/2024 | \$1,606.44 |
| Thomson Reuters, Check No. 40158 Date: 07/31/24 | 07/24/2024 | \$23.76 |
| Relx Inc DBA LexisNexis, Check No. 40116 Date: 07/24/24 Check No. 40126 Date: 07/24/24 Check No. 40116 Date: 07/24/24 | 07/24/2024 | \$169.69 |
| Thomson Reuters, Check No. 40242 Date: 08/20/24 | 08/20/2024 | \$2,343.00 |
| Relx Inc DBA LexisNexis, Check No. 40290 Date: 09/04/24 | 09/04/2024 | \$954.83 |
| Relx Inc DBA LexisNexis, Check No. 40373 Date: 09/18/24 | 09/18/2024 | \$101.19 |
| Relx Inc DBA LexisNexis, Check No. 40538 Date: 10/23/24 | 10/23/2024 | \$277.84 |
| Relx Inc DBA LexisNexis, Check No. 40704 Date: 11/20/24 | 11/20/2024 | \$35.21 |
| Thomson Reuters, Check No. 41015 Date: 01/29/25 | 01/29/2025 | \$2,377.18 |
| Thomson Reuters, Check No. 41015 Date: 01/29/25 | 01/29/2025 | \$5,291.68 |
| Thomson Reuters, Check No. 41122 Date: 02/19/25 | 02/12/2025 | \$1,272.07 |
| Thomson Reuters, Check No. 41254 Date: 03/19/25 | 03/19/2025 | \$1,038.57 |
| Thomson Reuters, Check No. 41447 Date: 04/23/25 Check No. 41447 Date: 04/23/25 | 04/23/2025 | \$1,614.08 |
| Relx Inc DBA LexisNexis, Check No. 41584 Date: 05/21/25 | 05/21/2025 | \$1.89 |
| Thomson Reuters, Check No. 41590 Date: 05/21/25 | 05/21/2025 | \$1,374.34 |

| Type of Expense | Date | Expense Amount |
|---|------------|--------------------|
| Relx Inc DBA LexisNexis, Check No. 41938
Date: 07/30/25 | 07/30/2025 | \$0.26 |
| Thomson Reuters, Check No. 42037 Date:
08/20/25 Check No. 42024 Date: 08/20/25 | 08/20/2025 | \$1,057.31 |
| Thomson Reuters, Check No. 42161 Date:
09/17/25 | 09/17/2025 | \$2,028.34 |
| Relx Inc DBA LexisNexis, Check No. 42360
Date: 10/22/25 | 10/22/2025 | \$119.46 |
| Thomson Reuters, Check No. 42366 Date:
10/22/25 | 10/22/2025 | \$796.51 |
| Relx Inc DBA LexisNexis, Check No. 42509
Date: 11/19/25 | 11/19/2025 | \$40.70 |
| Thomson Reuters, Check No. 42515 Date:
11/19/25 | 11/19/2025 | \$1,585.13 |
| Relx Inc DBA LexisNexis, Check No. 42596
Date: 12/17/25 | 12/17/2025 | \$32.31 |
| Thomson Reuters, Check No. 42598 Date:
12/17/25 | 12/17/2025 | \$927.70 |
| Thomson Reuters, Check No. 42674 Date:
01/21/26 | 01/21/2026 | \$1,369.10 |
| Relx Inc DBA LexisNexis, Check No. ACH-
20260225-31 Date: 02/25/26 | 02/18/2026 | \$1.08 |
| Thomson Reuters, Check No. ACH-20260225-
32 Date: 02/25/26 | 02/18/2026 | \$3,352.65 |
| Relx Inc DBA LexisNexis, Check No. ACH-
20260325-321 Date: 03/25/26 | 03/25/2026 | \$4.07 |
| Thomson Reuters, Check No. ACH-20260325-
328 Date: 03/25/26 | 03/25/2026 | \$9,985.58 |
| Relx Inc DBA LexisNexis, Check No. ACH-
20260422-42 Date: 04/22/26 | 04/22/2026 | \$59.59 |
| Thomson Reuters, Check No. ACH-20260422-
40 Date: 04/22/26 | 04/22/2026 | \$1,662.49 |
| Thomson Reuters, Check No. ACH-20260527-6
Date: 05/27/26 | 05/27/2026 | \$182.64 |
| Relx Inc DBA LexisNexis, Check No. ACH-
20260527-11 Date: 05/27/26 | 05/27/2026 | \$245.63 |
| Relx Inc DBA LexisNexis, Check No. ACH-
20260729-44 Date: 07/29/26 | 07/29/2026 | \$0.53 |
| Thomson Reuters, Check No. ACH-20260729-
45 Date: 07/29/26 | 07/29/2026 | \$1,071.36 |
| Total Legal Research | | \$44,795.50 |
| | | |
| Type of Expense - Postage & Express Mail | | |
| FedEx, Check No. 41497 Date: 05/07/25 | 05/07/2025 | \$131.76 |
| FedEx, Check No. 41497 Date: 05/07/25 | 05/07/2025 | \$132.04 |
| FedEx, Check No. 41535 Date: 05/14/25 | 05/14/2025 | \$72.21 |
| FedEx, Check No. 41608 Date: 05/28/25 | 05/28/2025 | \$37.26 |
| FedEx, Check No. 42848 Date: 04/15/26 | 04/15/2026 | \$42.34 |
| Total Postage & Express Mail | | \$415.61 |

| Type of Expense | Date | Expense Amount |
|--|------------|-------------------|
| Type of Expense - Document Hosting & Management | | |
| Relativity document magement costs | 01/31/2026 | \$728.84 |
| Relativity document magement costs | 02/28/2026 | \$730.36 |
| Relativity document magement costs | 03/31/2026 | \$752.04 |
| Relativity document magement costs | 04/30/2026 | \$786.04 |
| Relativity document magement costs | 05/31/2026 | \$786.04 |
| Relativity document magement costs | 06/30/2026 | \$463.04 |
| Relativity document magement costs | 07/31/2026 | \$463.04 |
| Relativity document magement costs | 08/31/2026 | \$463.04 |
| Relativity document magement costs | 09/30/2026 | \$463.04 |
| Relativity document magement costs | 10/31/2026 | \$463.04 |
| Total Document Hosting & Management | | \$6,098.52 |
| Type of Expense - Local Transportation | | |
| Uber Technologies Inc, Check No. W071024B1 Date: 07/10/24 | 07/10/2024 | \$46.48 |
| Uber Technologies Inc Check No. W071024B1 Date: 07/10/24 | 07/10/2024 | \$6.97 |
| Uber Technologies Inc, Check No. W071024B1 Date: 07/10/24 | 07/10/2024 | \$43.10 |
| Uber Technologies Inc, Check No. W071024B1 Date: 07/10/24 | 07/10/2024 | \$6.46 |
| Uber Technologies Inc Check No. W080824C Date: 08/08/24 Check No. W080824C1 Date: 08/08/24 | 08/07/2024 | \$82.93 |
| Uber Technologies Inc Check No. W080824C Date: 08/08/24 Check No. W080824C1 Date: 08/08/24 | 08/07/2024 | \$8.29 |
| Uber Technologies Inc Check No. W101624K Date: 10/16/24 | 10/16/2024 | \$36.90 |
| Uber Technologies Inc Check No. W101624K Date: 10/16/24 | 10/16/2024 | \$5.53 |
| AMEX. CURB TAXI APP CURB T LONG IS CITY NY; Taxi / Car Service; Taxi / Car Service | 10/02/2024 | \$33.12 |
| Uber Technologies Inc Check No. W050725E Date: 05/07/25 | 05/07/2025 | \$151.17 |
| Uber Technologies Inc Check No. W050725E Date: 05/07/25 | 05/07/2025 | \$106.54 |
| Uber Technologies Inc Check No. W050725E Date: 05/07/25 | 05/07/2025 | \$16.71 |
| Uber Technologies Inc Check No. W050725E Date: 05/07/25 | 05/07/2025 | \$180.61 |
| Uber Technologies Inc Check No. W050725E Date: 05/07/25 | 05/07/2025 | \$174.24 |
| Uber Technologies Inc Check No. W050725E Date: 05/07/25 | 05/07/2025 | \$34.84 |

| Type of Expense | Date | Expense Amount |
|---|------------|----------------|
| AMEX. FLYWHEEL TAXI CO. (B SOUTH SAN FRANCISCO CA; Taxi / Car Service; Taxi / Car Service | 04/22/2025 | \$73.98 |
| Uber Technologies Inc Check No. W061825C2
Date: 06/18/25 | 06/18/2025 | \$18.06 |
| Uber Technologies Inc Check No. W010726H1
Date: 01/07/26 | 01/07/2026 | \$29.67 |
| Uber Technologies Inc Check No. W010726H1
Date: 01/07/26 | 01/07/2026 | \$5.93 |
| Uber Technologies Inc Check No. W020526E
Date: 02/04/26 | 02/04/2026 | \$244.93 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$59.24 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$47.94 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$54.66 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$24.49 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$25.34 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$2.53 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$205.62 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$20.56 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$23.97 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$2.39 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$154.99 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$30.99 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$87.99 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$17.59 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$99.57 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$19.91 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$84.99 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$16.99 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$23.98 |
| Uber Technologies Inc Check No. W031126D1
Date: 03/11/26 | 03/11/2026 | \$2.39 |

| Type of Expense | Date | Expense Amount |
|---|------------|----------------|
| AMEX. 790 7TH AVENUE PARKI New York NY; Parking; Parking | 02/10/2026 | \$72.00 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$25.97 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$3.89 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$28.66 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$4.29 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$66.21 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$3.00 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$63.02 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$85.98 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$30.28 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$4.54 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$17.19 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$28.50 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$4.27 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$98.98 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$19.79 |
| Uber Technologies Inc Check No. W040826B1
Date: 04/08/26 | 04/08/2026 | \$199.63 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$19.96 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$28.58 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$2.85 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$98.98 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$19.79 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$24.95 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$3.74 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$34.34 |

| Type of Expense | Date | Expense Amount |
|--|------------|-------------------|
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$5.15 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$6.15 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$99.99 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$249.11 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$37.36 |
| Uber Technologies Inc Check No. W051326C1
Date: 05/13/26 | 05/13/2026 | \$19.99 |
| Uber Technologies Inc Check No. W061026
Date: 06/10/26 | 06/10/2026 | \$78.03 |
| Uber Technologies Inc Check No. W061026
Date: 06/10/26 | 06/10/2026 | \$15.60 |
| Total Local Transportation | | \$3,813.36 |
| | | |
| Type of Expense - Out of Town Travel | | |
| AMEX. Delta; Airfare; Airfare - Roundtrip airfare to San Francisco - coach fare \$852 | 03/20/2025 | 852.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee | 03/20/2025 | 45.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee; Roundtrip airfare to SFO - agency fee | 03/20/2025 | 45.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee; Roundtrip airfare to SFO - agency fee | 04/10/2025 | 45.00 |
| AMEX. American; Airfare; Roundtrip airfare OKC to SFO - coach \$805.36 | 04/10/2025 | 805.36 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee; Roundtrip airfare to SFO - agency fee | 04/15/2025 | 45.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee - for flight to San Francisco | 04/16/2025 | 45.00 |
| AMEX. Delta; Airfare; Roundtrip airfare to San Francisco - coach fare \$852 | 04/16/2025 | 852.00 |
| AMEX. 49 MILE MARKET ST203 SAN FRANCISCO CA; Dinner | 04/22/2025 | 32.80 |
| AMEX. TAQUERIA MANA SAN FRANCISCO CA; Lunch; Lunch | 04/23/2025 | 25.00 |
| AMEX. The Ritz-Carlton, San Francisco CA; Hotel - Lodging; Hotel - 1 night | 04/24/2025 | 350.00 |
| AMEX. The Ritz-Carlton, San Francisco CA; Hotel - Lodging; Lodging - 3 nights | 04/25/2025 | 1,050.00 |
| AMEX. The Ritz-Carlton, San Francisco CA; Hotel - Lunch - 3 persons | 04/25/2025 | 150.00 |

| Type of Expense | Date | Expense Amount |
|---|------------|----------------|
| AMEX. The Ritz-Carlton, San Francisco CA; Hotel - Breakfast; Breakfast | 04/25/2025 | 4.51 |
| AMEX. The Ritz-Carlton, San Francisco CA; Hotel - Dinner; Dinner | 04/25/2025 | 50.00 |
| AMEX. The Ritz-Carlton, San Francisco CA; Hotel - Lodging - 2 nights | 04/25/2025 | 700.00 |
| Check issued to Chase Rankin Check No. 41485 Date: 05/07/25, Uber and airport parking | 05/07/2025 | 198.93 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 14.96 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 5.00 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 26.88 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 39.46 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 7.89 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 57.74 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 16.74 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 25.19 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 7.00 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 10.39 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 105.74 |
| Uber Technologies Inc Check No. W050725D Date: 05/07/25 | 05/07/2025 | 21.15 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee; Trip to San Francisco - agency fee | 09/12/2025 | 45.00 |
| AMEX. Delta; Airfare; Roundtrip airfare to San Francisco (Coach fare \$796) | 09/12/2025 | 796.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee | 10/14/2025 | 35.00 |
| AMEX. Delta; Airfare; Airfare - Roundtrip airfare to San Francisco (Coach fare \$796) | 10/16/2025 | 796.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee | 10/16/2025 | 45.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee; Hotel reservation | 11/17/2025 | 35.00 |
| AMEX. THE LANGHAM NY 5TH A NEW YORK NY; Hotel - Lodging - 3 nights | 12/07/2025 | 1,050.00 |
| AMEX. THE LANGHAM NY 5TH A NEW YORK NY; Hotel - Dinner - Dec 8 & 9 | 12/10/2025 | 100.00 |

| Type of Expense | Date | Expense Amount |
|---|------------|--------------------|
| AMEX. THE LANGHAM NY 5TH A NEW YORK NY; Hotel - Lunch | 12/10/2025 | 25.00 |
| AMEX. Delta; Airfare; Roundtrip airfare to SFO (Coach fare \$2557.80) | 02/03/2026 | 2,557.80 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee; Trip to SFO - agency fee | 02/03/2026 | 45.00 |
| AMEX. American; Airfare - round trip OKC to LGA (coach fare) | 02/27/2026 | 1,278.21 |
| AMEX. TRAVEL AGENCY SERVIC ALLEYTON TX; Travel Agency Fee; | 02/27/2026 | 38.00 |
| AMEX. NEW YORK HILTON MIDT NEW YORK NY; Hotel - Lodging; iRhythm mediation - 2 nights | 03/13/2026 | 700.00 |
| Check issued to Chase Rankin Check No. ACH-20260325-272 Date: 03/25/26 (Ubers and airport parking) | 3/25/2026 | 273.61 |
| AMEX. UNITED AIRLINES HOUSTON TX; Air WiFi; Inflight wifi | 04/01/2026 | 10.00 |
| AMEX. TRAVEL AGENCY SERVIC NEW YORK NY; Travel Agency Fee; Roundtrip airfare to SFO - agency fee | 06/16/2026 | 45.00 |
| AMEX. Delta; Airfare; Roundtrip airfare to SFO (coach \$871.79) | 06/16/2026 | 871.79 |
| Total Out of Town Travel | | \$14,380.15 |
| | | |
| Type of Expense - Working Meals | | |
| AMEX. NEW YORK NY; Working Breakfast | 02/27/2024 | 10.88 |
| AMEX. BLUE BOTTLE COFFEE New York NY; Working Lunch | 03/05/2024 | 15.34 |
| iRhythm GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 39701 Date: 05/08/24 - Working Lunch | 04/01/2024 | 22.51 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40142 Date: 07/31/24 - Working Lunch | 07/01/2024 | 25.00 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40187 Date: 08/13/24 - Working Dinner | 07/09/2024 | 37.95 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40187 Date: 08/13/24 - Working Lunch | 07/11/2024 | 25.00 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40187 Date: 08/13/24 - Working Dinner | 07/17/2024 | 34.27 |
| Check issued to GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40496 Date: 10/16/24 - Working Dinner | 09/10/2024 | 29.45 |

| Type of Expense | Date | Expense Amount |
|---|------------|----------------|
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40597 Date: 11/06/24 - Working Dinner | 10/02/2024 | 29.10 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40597 Date: 11/06/24 - Working Dinner | 10/09/2024 | 32.58 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 40597 Date: 11/06/24 - Working Lunch | 10/11/2024 | 25.00 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 41270 Date: 03/26/25 - Working Lunch | 02/25/2025 | 25.00 |
| GrubHub Holdings Inc f/k/a Seamless North America LLC Check No. 41270 Date: 03/26/25 - Working Dinner | 02/25/2025 | 26.72 |
| AMEX. TST* CHOPT CREATIVE NEW YORK NY; Working Lunch | 07/22/2025 | 15.78 |
| AMEX. CAFE DUKE 0000 NEW YORK NY; Working Lunch | 07/23/2025 | 14.10 |
| AMEX. UBER EATS HTTPS://HELP.UBER.CA; Working Dinner | 07/23/2025 | 41.06 |
| AMEX. UBER EATS HTTPS://HELP.UBER.CA; Working Dinner | 07/25/2025 | 40.00 |
| AMEX. SEAMLSS*SALUGGISEAST NEW YORK NY; Working Dinner | 08/06/2025 | 40.00 |
| AMEX. SEAMLSS*SALUGGISEAST NEW YORK NY; Working Dinner | 08/07/2025 | 40.00 |
| AMEX. TST* TIPTARA 3007312 NEW YORK NY; Working Dinner | 08/15/2025 | 40.00 |
| AMEX. UBER EATS HTTPS://HELP.UBER.CA; Working Dinner | 08/16/2025 | 26.06 |
| AMEX. UBER EATS HTTPS://HELP.UBER.CA; Working Dinner | 08/16/2025 | 36.45 |
| GrubHub Holdings Inc Check No. 42487 Date: 11/19/25 - Working Dinner | 10/22/2025 | 34.84 |
| Check issued to GrubHub Holdings Inc Check No. 42529 Date: 12/03/25 Check No. 42530 Date: 12/03/25 - Working Dinner | 10/28/2025 | 37.63 |
| GrubHub Holdings Inc Check No. 42649 Date: 01/14/26 - Meeting/Catering - Breakfast Meeting | 12/09/2025 | 59.63 |
| GrubHub Holdings Inc Check No. 42649 Date: 01/14/26 - Meeting/Catering - Lunch Meeting | 12/09/2025 | 219.54 |
| AMEX. CAPITAL GRILLE 01380 NEW YORK NY; Business Meals; Client dinner - 6 people | 12/10/2025 | 300.00 |
| GrubHub Holdings Inc Check No. 42700 Date: 02/04/26 - Working Lunch | 01/05/2026 | 25.00 |
| GrubHub Holdings Inc Check No. 42700 Date: 02/04/26 - Working Dinner | 01/13/2026 | 40.00 |

| Type of Expense | Date | Expense Amount |
|---|------------|----------------|
| GrubHub Holdings Inc Check No. 42751 Date: 02/18/26 - Working Dinner | 01/28/2026 | 40.00 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Working Lunch | 02/02/2026 | 25.00 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Working Dinner | 02/04/2026 | 40.00 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Meeting/Catering - Breakfast for Depo | 02/05/2026 | 164.19 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Meeting/Catering - Lunch for Depo | 02/05/2026 | 459.40 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Working Lunch | 02/05/2026 | 25.00 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Meeting/Catering - Breakfast for Depo | 02/06/2026 | 157.76 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Meeting/Catering - Lunch for Depo | 02/06/2026 | 301.06 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Working Dinner | 02/09/2026 | 40.00 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Working Dinner | 02/09/2026 | 40.00 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Working Dinner | 02/09/2026 | 36.27 |
| GrubHub Holdings Inc Check No. 42806 Date: 03/18/26 - Working Dinner | 02/10/2026 | 40.00 |
| GrubHub Holdings Inc Check No. ACH-20260325-314 Date: 03/25/26 - Working Dinner | 02/17/2026 | 40.00 |
| GrubHub Holdings Inc Check No. ACH-20260325-314 Date: 03/25/26 - Working Dinner | 02/25/2026 | 39.76 |
| GrubHub Holdings Inc Check No. 42864 Date: 04/22/26 - Working Dinner | 03/17/2026 | 40.00 |
| GrubHub Holdings Inc Check No. 42864 Date: 04/22/26 - Working Dinner | 03/18/2026 | 39.04 |
| GrubHub Holdings Inc Check No. 42864 Date: 04/22/26 - Working Dinner | 03/18/2026 | 40.00 |
| GrubHub Holdings Inc Check No. 42864 Date: 04/22/26 - Working Dinner | 03/18/2026 | 21.94 |
| GrubHub Holdings Inc Check No. 42864 Date: 04/22/26 - Working Dinner | 03/25/2026 | 32.33 |
| GrubHub Holdings Inc Check No. 42864 Date: 04/22/26 - Working Dinner | 03/26/2026 | 18.01 |
| GrubHub Holdings Inc Check No. 42864 Date: 04/22/26 - Working Dinner | 03/26/2026 | 40.00 |
| GrubHub Holdings Inc Check No. ACH-20260513-21 Date: 05/13/26 - Working Dinner | 03/31/2026 | 40.00 |

| Type of Expense | Date | Expense Amount |
|--|------------|--------------------|
| AMEX. TST* DOUBLE KNOT- NY NEW YORK NY; Business Meals; Client Dinner - 4 people | 04/01/2026 | 200.00 |
| AMEX. TST* CUERNO NYC 0020 NEW YORK NY; Business Meals; Client Dinner - 5 people | 04/02/2026 | 250.00 |
| AMEX. TST* CHOPT CREATIVE NEW YORK NY; Lunch | 04/30/2026 | 21.20 |
| GrubHub Holdings Inc Check No. ACH-20260624-54 Date: 06/24/26 - Working Dinner | 06/02/2026 | 24.98 |
| GrubHub Holdings Inc Check No. ACH-20260624-54 Date: 06/24/26 - Working Dinner | 06/03/2026 | 18.13 |
| GrubHub Holdings Inc Check No. ACH-20260729-46 Date: 07/29/26 - Working Dinner | 06/11/2026 | 40.00 |
| GrubHub Holdings Inc Check No. ACH-20260729-46 Date: 07/29/26 - Working Dinner | 06/16/2026 | 40.00 |
| GrubHub Holdings Inc Check No. ACH-20260729-43 Date: 07/29/26 - Working Dinner | 06/23/2026 | 39.00 |
| Total Working Meals | | \$3,701.96 |
| | | |
| Type of Expense - Court Reporting & Transcripts | | |
| Kendra Steppler, RPR, CRR, Check No. 41503 Date: 05/07/25 | 05/07/2025 | \$83.20 |
| Irene Rodriguez, CSR, RMR ,CRR, Check No. 42311 Date: 10/15/25 | 10/15/2025 | \$343.10 |
| Echo Reporting, Inc., Check No. 42306 Date: 10/15/25 | 10/15/2025 | \$72.15 |
| US Legal Support, Inc, Check No. ACH-20260115-8 Date: 01/14/26 Check No. ACH-20260209-100 Date: 01/21/26 Check No. ACH-20260115-8 Date: 01/14/26 | 01/14/2026 | \$11,716.06 |
| US Legal Support, Inc, Check No. ACH-20260225-18 Date: 02/25/26 | 02/25/2026 | \$12,066.20 |
| US Legal Support, Inc, Check No. ACH-20260311-11 Date: 03/11/26 | 03/11/2026 | \$6,806.44 |
| Everest Court Reporting LLC, Invoice 76949 - Elizabeth O'Leary Deposition | 04/09/2026 | \$2,372.00 |
| Everest Court Reporting LLC, Invoice 77033 - Lauren Steg Deposition | 04/10/2026 | \$5,114.90 |
| Ruth Levine Ekhaus, Check No. ACH-20260617-26 Date: 06/17/26 | 06/17/2026 | \$45.85 |
| Total Court Reporting & Transcripts | | \$38,619.90 |

| Type of Expense | Date | Expense Amount |
|--|------------|---------------------|
| Type of Expense - Experts & Consultants | | |
| Forensic Economics Inc. Invoice iRh22402-FE | 03/15/2024 | \$6,758.75 |
| Forensic Economics Inc. Invoice iRh22403-FE | 04/15/2024 | \$1,325.00 |
| Gnarus Medical Consulting, Inc, Check No. 40307 Date: 09/11/24 | 09/11/2024 | \$9,675.00 |
| Forensic Economics Inc. Invoice iRh22408-FE | 09/15/2024 | \$5,343.75 |
| Forensic Economics Inc. Invoice iRh22410-FE | 11/15/2024 | \$3,777.50 |
| Forensic Economics Inc. Invoice iRh22506-FE | 07/15/2025 | \$7,130.00 |
| FIDERES Partners LLP, Check No. W102825A Date: 10/29/25, Invoice 2025-13 | 09/30/2025 | \$75,900.00 |
| FIDERES Partners LLP, Check No. W102825A Date: 10/29/25, Invoice 2025-16 | 09/30/2025 | \$5,000.00 |
| Forensic Economics Inc. Invoice iRh22509-FE | 10/15/2025 | \$2,281.25 |
| FIDERES Partners LLP, Check No. W010726F Date: 01/05/26, Invoice 2025-18 | 10/31/2025 | \$19,800.00 |
| FIDERES Partners LLP, Check No. W010726F Date: 01/05/26, Invoice 2025-22 | 11/20/2025 | \$2,180.00 |
| FIDERES Partners LLP, Check No. W020526D Date: 02/04/26, Invoice 2025-26 | 12/31/2025 | \$33,100.00 |
| SEDA Experts, LLC Check No. ACH-20260304-7 Date: 03/04/26 | 03/02/2026 | \$5,355.00 |
| FIDERES Partners LLP, Check No. W050626F Date: 05/06/26, Invoice 2026-01 | 02/28/2026 | \$234,800.00 |
| FIDERES Partners LLP, Check No. W050626F Date: 05/06/26, Invoice 2026-04 | 03/31/2026 | \$13,600.00 |
| FIDERES Partners LLP, Invoice 2026-07 | 07/31/2026 | \$24,900.00 |
| Total Experts & Consultants | | \$450,926.25 |
| Type of Expense - Independent Witness Counsel | | |
| Slarskey LLC, Check No. 40577 Date: 10/30/24 | 10/30/2024 | \$1,687.50 |
| Slarskey LLC, Check No. 40707 Date: 11/20/24 | 11/20/2024 | \$187.50 |
| Slarskey LLC, Check No. 42117 Date: 09/10/25 | 09/10/2025 | \$940.00 |
| Slarskey LLC, Check No. 42403 Date: 10/29/25 | 10/29/2025 | \$2,620.00 |
| Slarskey LLC, Check No. ACH-20260218-10 Date: 02/18/26 | 02/18/2026 | \$9,081.25 |
| Slarskey LLC, Check No. ACH-20260318-8 Date: 03/18/26 | 03/18/2026 | \$487.50 |
| Slarskey LLC, Check No. ACH-20260429-26 Date: 04/29/26 | 04/29/2026 | \$1,462.50 |

| Type of Expense | Date | Expense Amount |
|---|------------|--------------------|
| Slarskey LL, Check No. ACH-20260701-5 Date: 07/01/26 | 07/01/2026 | \$585.00 |
| Total Independent Witness Counsel | | \$17,051.25 |
| | | |
| Type of Expense - Mediation Fees | | |
| Phillips ADR Enterprises P.C., Check No. W030426B Date: 03/04/26 | 03/04/2026 | \$40,000.00 |
| Phillips ADR Enterprises P.C., Check No. W051326F2 Date: 05/13/26 | 05/13/2026 | \$15,950.00 |
| Total Mediation Fees | | \$55,950.00 |

TOTAL FOR ALL EXPENSES: \$672,934.95

Exhibit 10

EXHIBIT 10

Glazing Employers & Glaziers' Union Local #27 Pension & Retirement Fund
v. iRhythm Technologies, Inc, Case No. 3:24-cv-706-JSC (N.D. Cal.)

**COMPENDIUM OF UNPUBLISHED AUTHORITY
CITED IN FEE AND EXPENSE MOTION**

| Exhibit | |
|----------------|---|
| 10A | <i>In re Nutanix Inc. Sec. Litig.</i> , No. 19-cv-01651-WHO, slip op. (N.D. Cal. Oct. 6, 2023), Dkt. No. 326 |
| 10B | <i>In re SanDisk LLC Sec. Litig.</i> , No. 3:15-cv-01455-VC, slip op. (N.D. Cal. Oct. 23, 2019), Dkt. No. 284 |
| 10C | NERA ECONOMIC CONSULTING, RECENT TRENDS IN SECURITIES CLASS ACTION LITIGATION: 2025 FULL-YEAR REVIEW (2026) |
| 10D | Declaration of Michael Albert, <i>In re Alphabet, Inc. Sec. Litig.</i> , No. 3:18-cv-06245-TLT (N.D. Cal. July 19, 2024), Dkt. No. 234-1 (excerpt) |
| 10E | Debtor's Application for Entry of an Order Authorizing Retention and Employment of Quinn Emanuel, <i>In re Firstbase.io, Inc.</i> , No. 24-11647 (LGB) (Bankr. S.D.N.Y, Oct. 31, 2024), Dkt. No. 30 |
| 10F | Summary of First Interim Application, <i>In re Apple Tree Life Sciences, Inc.</i> , No. 24-12177 (LSS) (Bankr. D. Del. May 22, 2026), Dkt. Nos. 707, 707-1 (excerpt) |
| 10G | Sixth & Final Fee Application of Quinn Emanuel, <i>In re Saga Formations, Inc.</i> , No. 24-11161 (BLS) (Bankr. D. Del. Apr. 16, 2026), Dkt. No. 1171 (excerpt) |
| 10H | Declaration of Adam B. Wolfson, <i>Health Republic Ins. Co. v. United States</i> , No. 16-259 (Fed. Cl. May 2, 2023), Dkt. No. 192-1, 191-2 (excerpt) |

Exhibit 10A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE NUTANIX INC. SECURITIES
LITIGATION

Norton, *et al.*

Plaintiffs

vs.

NUTANIX, INC., *et al.*

Defendants

Case No. [19-cv-01651-WHO](#)

Case No. 21-cv-04080-WHO

**FINAL APPROVAL ORDER AND
ORDER AWARDING FEES AND
COSTS**

Re: Dkt. Nos. 317, 318

This matter came before the Court for hearing on October 4, 2023. Due and adequate notice having been given to the Class as required in the Order, the Court having considered all papers filed and proceedings held herein and otherwise being fully informed in the premises and good cause appearing therefore, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. This Judgment incorporates by reference the definitions in the Stipulation, and all capitalized terms used herein shall have the same meanings as set forth in the Stipulation, unless otherwise stated herein.

2. This Court has jurisdiction over the subject matter of the Actions and over all parties to the Actions, including all members of the Class.

3. Pursuant to Rule 23 of the Federal Rules of Civil Procedure, the Court hereby affirms its determination in the Preliminary Approval Order and finally certifies for purposes of the Settlement only a Class defined as: “all persons or entities who: (i) purchased or otherwise acquired Nutanix, Inc. (“Nutanix”) securities between November 30, 2017 and May 30, 2019, inclusive (the “Class Period”), and/or (ii) transacted in publicly traded call options and/or put

options of Nutanix during the Class Period. Excluded from the Class are Nutanix and its subsidiaries and affiliates, the Individual Defendants, any of Defendants' respective officers and directors at all relevant times, and any of their immediate families, legal representatives, heirs, successors, or assigns, and any entity in which any Defendant has or had a Controlling Interest."

4. Also excluded from the Class is any Person who timely and validly sought exclusion from the Class, as identified in Dkt. No. 320-2.

5. Pursuant to Rule 23 of the Federal Rules of Civil Procedure, this Court hereby approves the Settlement set forth in the Stipulation and finds that:

(a) in light of the benefits to the Class and the complexity and expense of further litigation, the Stipulation and the Settlement contained therein are, in all respects, fair, reasonable, and adequate;

(b) there was no collusion in connection with the Stipulation;

(c) Plaintiffs and Lead Counsel have adequately represented the Class;

(d) the Stipulation was the product of informed, arm's-length negotiations among competent, able counsel;

(e) the relief provided for the Class is adequate, having taken into account: (i) the costs, risks, and delay of trial and appeal; (ii) the effectiveness of any proposed method of distributing relief to the Class, including the method of processing Class Member's claims; (iii) the terms of any proposed award of attorneys' fees, including timing of payment; and (iv) any agreement required to be identified under Federal Rule of Civil Procedure 23(e)(3);

(f) the proposed Plan of Allocation treats Class Members equitably relative to each other; and

(g) the record is sufficiently developed and complete to have enabled Plaintiffs and Defendants to have adequately evaluated and considered their positions.

6. Pursuant to Federal Rule of Civil Procedure 23, this Court hereby finds and concludes that due and adequate notice was directed to Persons who are Class Members advising them of the Plan of Allocation and of their right to object thereto, and a full and fair opportunity

1 was accorded to such Persons and entities who are Class Members to be heard with respect to the
2 Plan of Allocation.

3 7. The distribution of the Postcard Notice by email and mail (where no email was
4 available), posting of the Notice and Proof of Claim, and publication of the Summary Notice as
5 provided for in the Preliminary Approval Order constituted the best notice practicable under the
6 circumstances, including individual notice to Class Members who could be identified through
7 reasonable effort. The notice provided was the best notice practicable under the circumstances of
8 those proceedings and of the matters set forth therein, including the proposed Settlement set forth
9 in the Stipulation, to all Persons entitled to such notice, and said notice fully satisfied the
10 requirements of Federal Rule of Civil Procedure 23, due process and any other applicable law,
11 including the Private Securities Litigation Reform Act of 1995. No Class Member is relieved
12 from the terms of the Settlement, including the releases provided for therein, based upon the
13 contention or proof that such Class Member failed to receive actual or adequate notice. A full
14 opportunity has been offered to the Class Members to object to the proposed Settlement and to
15 participate in the hearing thereon. The Court further finds that the notice provisions of the Class
16 Action Fairness Act, 28 U.S.C. §1715, were fully discharged and that the statutory waiting period
17 has elapsed. Dkt. No. 321. Thus, it is hereby determined that all members of the Class are bound
18 by this Judgment, except those persons listed on Exhibit A to this Judgment.

19 8. The Court hereby finds and concludes that the formula for the calculation of the
20 claims of Authorized Claimants, which is set forth in the Notice of Pendency and Proposed
21 Settlement of Class Actions (the "Notice") provided to Class Members, provides a fair and
22 reasonable basis upon which to allocate the proceeds of the Net Settlement Fund provided by the
23 Settlement among eligible Class Members, with due consideration having been given to
24 administrative convenience and necessity.

25 8. The Court hereby finds and concludes that the Plan of Allocation, as set forth in the
26 Notice, is, in all respects, fair and reasonable, and the Court hereby approves the Plan of
27 Allocation.

28 9. Accordingly, the Court authorizes and directs implementation and performance of

1 all the terms and provisions of the Stipulation, as well as the terms and provisions hereof. Except
2 as to the one individual who has validly and timely requested exclusion from the Class (identified
3 at Dkt. 320-2), the Actions and all claims contained therein are dismissed with prejudice as to the
4 Plaintiffs, and the other Class Members and as against each and all of the Released Defendant
5 Parties. The Settling Parties are to bear their own costs except as otherwise provided in the
6 Stipulation.

7 10. No Person shall have any claim against the Plaintiffs, Lead Counsel, or the Claims
8 Administrator, or any other Person designated by Lead Counsel based on determinations or
9 distributions made substantially in accordance with the Stipulation and the Settlement contained
10 therein, the Plan of Allocation, or further order(s) of the Court.

11 11. Upon the Effective Date, Plaintiffs, and each of the Class Members (whether or not
12 such Class Members execute and deliver a Proof of Claim, but excluding Class Members who
13 have validly opted out of the Class), on behalf of themselves, and each of their respective heirs,
14 executors, administrators, predecessors, successors, assigns, parents, subsidiaries, affiliates,
15 officers, directors, agents, fiduciaries, beneficiaries or legal representatives, in their capacities as
16 such, and any other Person or entity legally entitled to bring Released Claims on behalf of a Class
17 Member, in that capacity, shall be deemed to have, and by operation of this Judgment shall have,
18 fully, finally, and forever compromised, settled, resolved, waived, released, discharged, and
19 dismissed each and every one of the Released Claims (including, without limitation, Unknown
20 Claims) against each and every one of the Released Defendant Parties with prejudice on the
21 merits, whether or not Plaintiffs, or such Class Member executes and delivers the Proof of Claim
22 and whether or not Plaintiffs, or each of the Class Members ever seeks or obtains any distribution
23 from the Settlement Fund. Claims to enforce the terms of the Stipulation are not released.

24 12. Upon the Effective Date, Defendants shall be deemed to have, and by operation of
25 this Judgment shall have, fully, finally, and forever waived, released, discharged, and dismissed
26 the Released Plaintiff Parties from all Released Defendants' Claims (including, without limitation,
27 Unknown Claims). Claims to enforce the terms of the Stipulation are not released. For the
28 avoidance of doubt, the releases, relinquishments and discharges provided by the Released

Defendant Parties in the Stipulation do not include the release, relinquishment or discharge of any claim or cause of action that any of the Released Defendant Parties may have against an insurer or reinsurer for, arising out of or related to insurance coverage for, arising out of or related to the Actions or any related matter or proceeding, including any derivative or ERISA actions based on similar allegations. Claims to enforce the terms of the Stipulation are not released.

13. Upon the Effective Date, Plaintiffs, all Class Members and anyone claiming through or on behalf of any of them are forever permanently barred and enjoined from commencing, instituting, maintaining, enforcing, asserting, or continuing to prosecute any action or proceeding in any court of law or equity, arbitration tribunal, administration forum or other forum of any kind any of the Released Claims (including, without limitation, Unknown Claims) against any of the Released Defendant Parties.

14. Neither the Stipulation nor the Settlement contained therein, nor any act performed or document executed pursuant to or in furtherance of the Stipulation or the Settlement: (i) is or may be deemed to be or may be used as an admission of, or evidence of, the validity of any Released Claim, or of any wrongdoing or liability of the Released Defendant Parties; or (ii) is or may be deemed to be or may be used as an admission of, or evidence of, any fault or omission of any of the Released Defendant Parties; or (iii) is or may be deemed to be or may be used as an admission or evidence that any claims asserted by Plaintiffs were not valid or that the amount recoverable was not greater than the Settlement Amount, in any civil, criminal, or administrative proceeding in any court, administrative agency, or other tribunal. For the avoidance of doubt, the Stipulation, this Settlement, the Exhibits, the Supplemental Agreement, and any other act performed or document executed pursuant to or in furtherance of the Stipulation of Settlement, as well as the negotiations leading to the execution of the Stipulation, and any proceedings, communications, drafts, documents or agreements taken pursuant to, or in connection with the Stipulation, (i) shall not be offered or received against the Released Defendant Parties as evidence of or construed as or deemed to be evidence of any presumption, concession, or admission by the Released Defendant Parties of the truth of any allegations by Plaintiffs, any member of the Class, or their Related Persons or the validity of any claim that has been or could have been asserted in

the Actions, or the deficiency of any defense that has been or could have been asserted in the Actions or in any other litigation, including, but not limited to, litigation of the Released Claims, or of any liability, negligence, fault, or wrongdoing of any kind of the Released Defendant Parties or in any way referred to for any other reason as against the Released Defendant Parties, in any civil, criminal, or administrative action or proceeding, other than such proceedings as may be necessary to effectuate the provisions of the Stipulation; (ii) shall not be offered or received against or to the prejudice of Released Defendant Parties as evidence of a presumption, concession, or admission of liability for any fault, misrepresentation, or omission with respect to any statement or written document approved or made by Released Defendant Parties, or against Lead Counsel or any member of the Class or their Related Persons as evidence of any infirmity in the claims of Plaintiffs and the Class; and (iii) shall not be offered or received against Released Defendant Parties as evidence of a presumption, concession, or admission of any liability, negligence, fault, or wrongdoing or in any way referred to for any other reason as against any of the parties to the Stipulation, in any other civil, criminal, or administrative action or proceeding; provided, however, that if the Stipulation is approved by the Court, the Released Defendant Parties may refer to it to effectuate the releases granted them hereunder. The Released Defendant Parties may file the Stipulation and/or the Judgment in any action that may be brought against them in order to support a defense or counterclaim based on principles of res judicata, collateral estoppel, release, good faith settlement, judgment bar or reduction, or any other theory of claim preclusion, issue preclusion, or similar defense or counterclaim.

15. Notice of Lead Counsel's motion for attorneys' fees and payment of expenses was given to all Class Members who could be identified with reasonable effort. The form and method of notifying the Class of the motion for attorneys' fees and expenses met the requirements of Rules 23 and 54 of the Federal Rules of Civil Procedure, Section 21D(a)(7) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(7), as amended by the Private Securities Litigation Reform Act of 1995, due process, and any other applicable law, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

1 16. The Court hereby awards Lead Counsel attorneys' fees of 25% of the Settlement
2 Amount (the benchmark in the Ninth Circuit), plus expenses in the amount of \$638,213.52,
3 together with the interest earned thereon for the same time period and at the same rate as that
4 earned on the Settlement Fund until paid. The Court finds that the amount of fees awarded is
5 appropriate, fair, and reasonable given the substantial risks of non-recovery, the contingent nature
6 of the representation, awards in similar cases, the time and effort involved, and the result obtained
7 for the Class.

8 17. In making this award of fees and expenses to Lead Counsel, the Court has
9 considered and found that:

10 (a) the Settlement has created a fund of \$71,000,000 in cash that is already on
11 deposit, and numerous Class Members who submit, or have submitted, valid Proof of
12 Claim forms will benefit from the Settlement created by Lead Counsel;

13 (b) over 154,700 copies of the Postcard Notice were disseminated to potential
14 Class Members indicating that Lead Counsel would move for attorneys' fees not to exceed
15 30% of the Settlement Amount and for expenses in an amount not to exceed \$750,000,
16 plus interest thereon, and no objections to the fees or expenses were filed by Class
17 Members;

18 (c) Lead Counsel have pursued the Actions and achieved the Settlement with
19 perseverance and diligent advocacy;

20 (d) Lead Counsel have expended substantial time and effort pursuing the
21 Actions on behalf of the Class;

22 (e) Lead Counsel pursued the Actions on a contingent basis, having received no
23 compensation during the Actions, and any fee amount has been contingent on the result
24 achieved;

25 (f) the Actions involve complex factual and legal issues and, in the absence of
26 settlement, would involve lengthy proceedings whose resolution would be uncertain;

27 (g) had Lead Counsel not achieved the Settlement, there would remain a
28 significant risk that the Class may have recovered less or nothing from Defendants;

(h) Plaintiffs' Counsel have devoted over 16,000 hours, with a lodestar value of \$10,581,445.25 to achieve the Settlement, and after considering and excluding from the lodestar cross-check the hours spent on disputes over the appointment of lead counsel, and award of 25% of the Settlement Amount is appropriate;

(i) Class Representative approved an amount in excess of the attorneys' fees awarded as fair and reasonable; and

(j) the attorneys' fees and expenses awarded are fair and reasonable and consistent with awards in similar cases within the Ninth Circuit.

18. Pursuant to 15 U.S.C. §78u-4(a)(4), the Court awards Class Representative California Ironworkers Field Pension Trust \$2,000.00 for its time and expenses representing the Class.

19. Without affecting the finality of this Judgment in any way, this Court hereby retains continuing jurisdiction over: (i) implementation of the Settlement and any award or distribution of the Settlement Fund, including interest earned thereon; (ii) disposition of the Settlement Fund; (iii) hearing and determining applications for attorneys' fees and expenses in the Actions; and (iv) all parties hereto for the purpose of construing, enforcing, and administering the Settlement.

20. In the event that the Settlement does not become effective in accordance with the terms of the Stipulation, or the Effective Date does not occur, or in the event that the Settlement Fund, or any portion thereof, is returned to the Defendants or their insurers, then this Judgment shall be rendered null and void to the extent provided by and in accordance with the Stipulation and shall be vacated; and in such event, all orders entered and releases delivered in connection herewith shall be null and void to the extent provided by and in accordance with the Stipulation.

21. The Settling Parties shall bear their own costs and expenses except as otherwise provided in the Stipulation or in this Judgment.

22. Without further order of the Court, the Settling Parties may agree to reasonable extensions of time to carry out any of the provisions of the Stipulation.

23. The Court's orders entered during these Actions relating to the confidentiality of

1 information shall survive this Settlement.

2 24. Class counsel shall file a post-distribution accounting within 21 days after the
3 settlement checks become stale (or, if no checks are issued, all funds have been paid to class
4 members, cy pres beneficiaries, and others pursuant to the settlement agreement). In addition to
5 the information contained in the Northern District of California's Procedural Guidance for Class
6 Action Settlements, available at [https://cand.uscourts.gov/forms/procedural-guidance-for-class-](https://cand.uscourts.gov/forms/procedural-guidance-for-class-action-settlements/)
7 [action-settlements/](https://cand.uscourts.gov/forms/procedural-guidance-for-class-action-settlements/), the post-distribution accounting shall discuss any significant or recurring
8 concerns communicated by class members to the settlement administrator or counsel since final
9 approval, any other issues in settlement administration since final approval, and how any concerns
10 or issues were resolved. Class Counsel shall also include a final accounting for the costs of the
11 Settlement Administrator, reflecting the costs savings from the reduction in the mailing of claims
12 packets and breaking down the other costs incurred in Settlement Administration.

13 25. The Court orders the Settlement Administrator to withhold 20% of the attorney's
14 fees granted in this order until the post-distribution accounting has been filed. Class counsel shall
15 file a proposed order releasing the remainder of the fees when they file their post-distribution
16 accounting.

17 26. This matter is set for a further case management conference on April 9, 2024, with
18 a case management statement due on April 2, 2024. The parties may request that the case
19 management conference be continued if additional time is needed to complete the distribution.
20 The conference will be vacated if the post-distribution accounting has been filed and the Court has
21 released the remaining attorney's fees.

22 **IT IS SO ORDERED.**

23 Dated: October 6, 2023

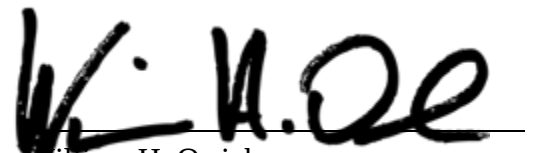
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26 William H. Orrick
27 United States District Judge
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Exhibit 10B

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

IN RE: SANDISK LLC SECURITIES
LITIGATION

Case No. 3:15-cv-01455-VC
Hon. Vince Chhabria

**REVISED ~~PROPOSED~~ ORDER
AWARDING ATTORNEYS' FEES,
PAYMENT OF LITIGATION
EXPENSES, AND REIMBURSEMENT
OF CLASS REPRESENTATIVES'
COSTS AND EXPENSES**

THIS MATTER having come before the Court for hearing on September 26, 2019 (the "Settlement Hearing") to determine, among other things, whether and in what amount to award (i) Plaintiffs' Counsel in the above-captioned consolidated securities class action (the "Action") attorneys' fees and litigation expenses in connection with their representation of the Class; and (ii) Class Representatives their costs and expenses pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"); the Court, having considered all papers filed and proceedings had herein and otherwise being fully informed;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. This Order operates by reference to the definitions in the Revised Stipulation and Agreement of Settlement filed on May 20, 2019 (ECF No. 274-1) (the "Stipulation"), and all capitalized terms used, but not defined, herein shall have the same meanings as those set forth in the Stipulation.

2. Pursuant to and in compliance with Rule 23 of the Federal Rules of Civil Procedure, this Court hereby finds and concludes that due and adequate notice was directed to Persons who are Class Members who could be identified with reasonable effort, advising them of Class Counsel's motion for an award of attorneys' fees, payment of litigation expenses and reimbursement of Class Representatives' costs and expenses and their right to object thereto, and

1 a full and fair opportunity was accorded to Persons who are Class Members to be heard. There
2 were no objections to Class Counsel's motion.

3 3. Class Counsel are hereby awarded, on behalf of all Plaintiffs' Counsel, attorneys'
4 fees in the amount of 25% of the Settlement Fund, plus accrued interest, and \$885,149.36, plus
5 accrued interest, in payment of Plaintiffs' Counsel's litigation expenses, which sums the Court
6 finds to be fair and reasonable. Consistent with this Court's established practice, 10% of the total
7 amount of attorneys' fees awarded is the percentage, proposed by Class Counsel given their
8 demonstrated commitment to the Class and hereby deemed an appropriate amount, that shall be
9 withheld until after a distribution of the Net Settlement Fund to Authorized Claimants has been
10 made. Otherwise, the attorneys' fees and expenses awarded shall be paid from the Settlement
11 Fund immediately upon entry of this Order, subject to the terms, conditions, and obligations of
12 the Stipulation, which terms, conditions, and obligations are incorporated herein by reference.

13 4. Class Counsel shall allocate the attorneys' fees awarded amongst Plaintiffs'
14 Counsel in a manner in which they, in good faith, believe reflects the contributions of such counsel
15 to the institution, prosecution, and settlement of the Action.

16 5. In making this award of attorneys' fees and expenses to be paid from the
17 Settlement Fund, the Court has considered and found that:

18 (a) the Settlement has created a fund of \$50,000,000 in cash, and Class
19 Members who submit acceptable Claim Forms will benefit from the Settlement that has
20 been achieved as a result of the efforts of Plaintiffs' Counsel;

21 (b) the attorneys' fees sought by Class Counsel have been reviewed and
22 approved as reasonable by Class Representatives, who are institutional investors that
23 oversaw the prosecution and resolution of the Action;

24 (c) copies of the revised Settlement Notice (ECF No. 274-3) were mailed to
25 over 203,000 potential Class Members and nominees, stating that Class Counsel would
26 apply for attorneys' fees in an amount not to exceed 28% of the Settlement Fund and
27 litigation expenses in an amount not to exceed \$1,000,000, and there were no objections
28

1 to the requested attorneys' fees and expenses, which are less than the amounts stated in
2 the revised Settlement Notice;

3 (d) the Action raised a number of complex issues;

4 (e) had Plaintiffs' Counsel not achieved the Settlement, there was a significant
5 risk that Class Representatives and the other members of the Class may have recovered
6 less or nothing at all from Defendants;

7 (f) Plaintiffs' Counsel have devoted nearly 30,000 hours with a lodestar value
8 of \$15,950,994.50 to this Action and have advanced \$885,149.36 in litigation expenses to
9 achieve the Settlement; and

10 (g) the amount of attorneys' fees and litigation expenses to be paid from the
11 Settlement Fund are fair and reasonable and consistent with awards in similar cases.

12 6. In accordance with the PSLRA, Class Representative City of Bristol Pension Fund
13 is hereby awarded \$7,300 from the Settlement Fund as reimbursement for its reasonable costs and
14 expenses directly related to its representation of the Class.

15 7. In accordance with the PSLRA, Class Representative Pavers and Road Builders
16 Pension, Annuity and Welfare Funds is hereby awarded \$7,717.50 from the Settlement Fund as
17 reimbursement for its reasonable costs and expenses directly related to its representation of the
18 Class.

19 8. In accordance with the PSLRA, Class Representative the City of Newport News
20 Employees' Retirement Fund is hereby awarded \$7,474.44 from the Settlement Fund as
21 reimbursement for its reasonable costs and expenses directly related to its representation of the
22 Class.

23 9. In accordance with the PSLRA, Class Representative Massachusetts Laborers'
24 Pension Fund is hereby awarded \$8,557.50 from the Settlement Fund as reimbursement for its
25 reasonable costs and expenses directly related to its representation of the Class.

26 10. Any appeal of or challenge to this Court's award of attorneys' fees, payment of
27 litigation expenses, and reimbursement of Class Representatives' costs and expenses in
28

1 connection with their representation of the Class shall in no way disturb or affect the finality of
2 the Judgment.

3 11. Exclusive jurisdiction is hereby retained over the Parties and Class Members for
4 all matters relating to this Action, including administration, interpretation, effectuation, or
5 enforcement of the Stipulation and this Order.

6 12. In the event that the Settlement is terminated or the Effective Date of the
7 Settlement fails to occur, this Order shall be rendered null and void to the extent provided by the
8 Stipulation.

9 Dated: October 23, 2019

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12 HONORABLE VINCE CHHABRIA
13 UNITED STATES DISTRICT JUDGE
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Exhibit 10C



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



INTRODUCTION

In 2025, there were 207 new federal securities class action suits filed, 25 less than in 2024. Cases with Rule 10b-5-only claims accounted for most of the decline in filings with 176 such suits filed, 22 less than in 2024. Filings against companies in the healthcare and technology sectors together accounted for 57% of new filings, and 71% of all cases were filed in the Second, Third, and Ninth Circuits. Approximately 43% of filings had an allegation related to missed earnings guidance, a five-year high, while only 13% had an allegation related to regulatory issues, a five-year low.

While 28.8% of listings on major US exchanges were represented by foreign companies in 2025, only 13.1% of standard cases, which contain alleged violations of Rule 10b-5, Section 11, and/or Section 12, were filed against foreign companies. Of the 25 standard filings against foreign companies in 2025, 12 were filed against companies based in Europe and six were filed against companies based in Canada.

Focusing on specific categories of cases, there were 17 filings with AI-related claims, accounting for 8% of all new filings, while there were 14 cases with crypto-related claims, 75% more than in 2024. In what may be a new trend in filings, there were four suits with tariff-related claims and one filing related to visa issues. Meanwhile, the number of filings with SPAC- and COVID-19-related claims have declined substantially, with only five and three suits filed in each category, respectively.

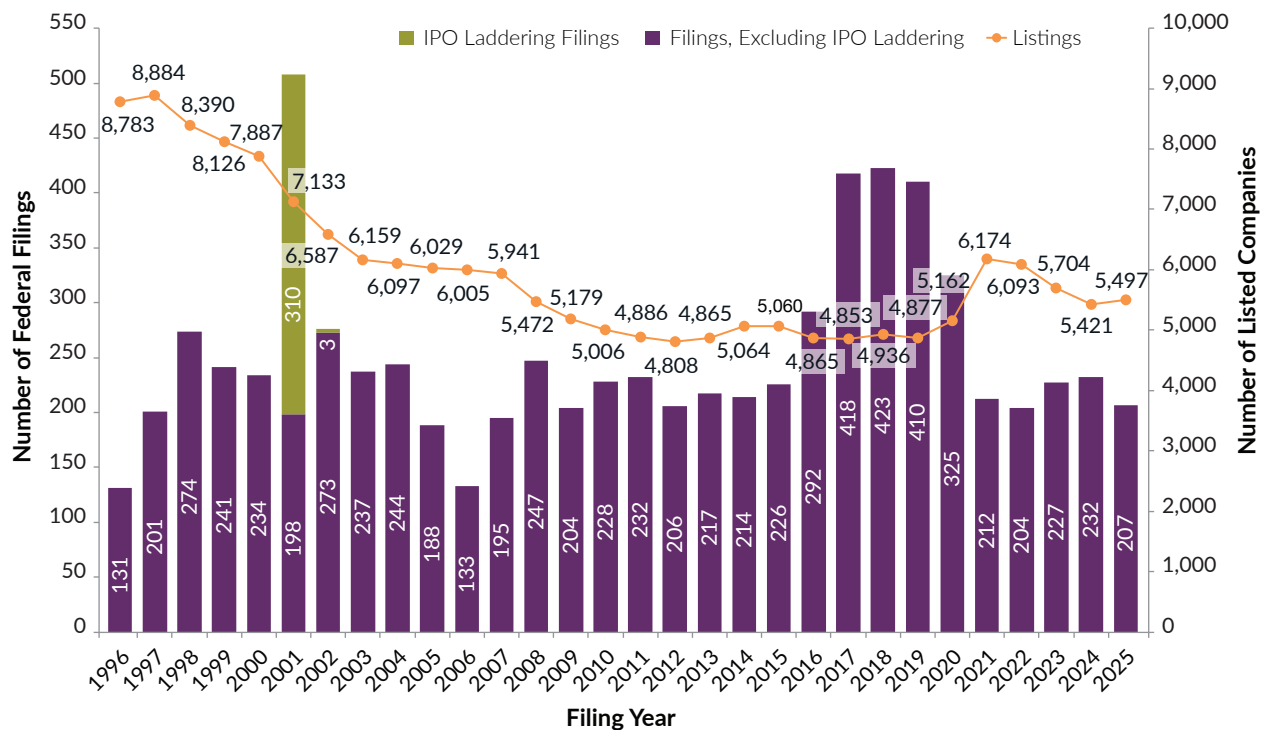
There were 234 cases resolved in 2025, 34 more relative to 2024 and marking the second consecutive year the number of resolved cases has increased. While the number of settlements declined by 16% to 79, the number of dismissals increased by 34% to 155, primarily driven by a record number of dismissals involving standard cases. With more existing cases resolved than new cases filed in 2025, the backlog of pending cases declined by 3.5% as of year-end. For cases filed in 2025, 9% have been dismissed and 91% remain pending.

Aggregate settlements totaled \$2.9 billion in 2025, with the largest settlement consisting of a \$433.5 million recovery against Alibaba Group Holding Company. Aggregate plaintiffs' attorneys' fees and expenses totaled \$797 million, or 27% of the 2025 aggregate settlement value. While the average settlement value declined by 9% in 2025 to \$40 million, the median settlement value increased by 21% to \$17 million, a 10-year high. Approximately 31% of all settlements were between \$20 million and \$49.9 million, the largest share in the past five years.

TRENDS IN FILINGS

There were 207 new federal securities class actions filed in the US in 2025, an 11% decline from the 232 cases filed in 2024 and ending a two-year increase in filings seen over 2022–2024.² As of November 2025, there were 5,497 companies listed on the NYSE and the Nasdaq, a slight increase from the 5,421 companies listed as of December 2024, though well below the recent high of 6,174 companies listed in 2021. The uptick in listed companies was partially driven by an increase in the number of US initial public offerings (IPOs), which increased from 225 in 2024 to 347 in 2025.³ Roughly 3.8% of companies listed on major US exchanges were subject to a securities class action in 2025. See Figure 1.

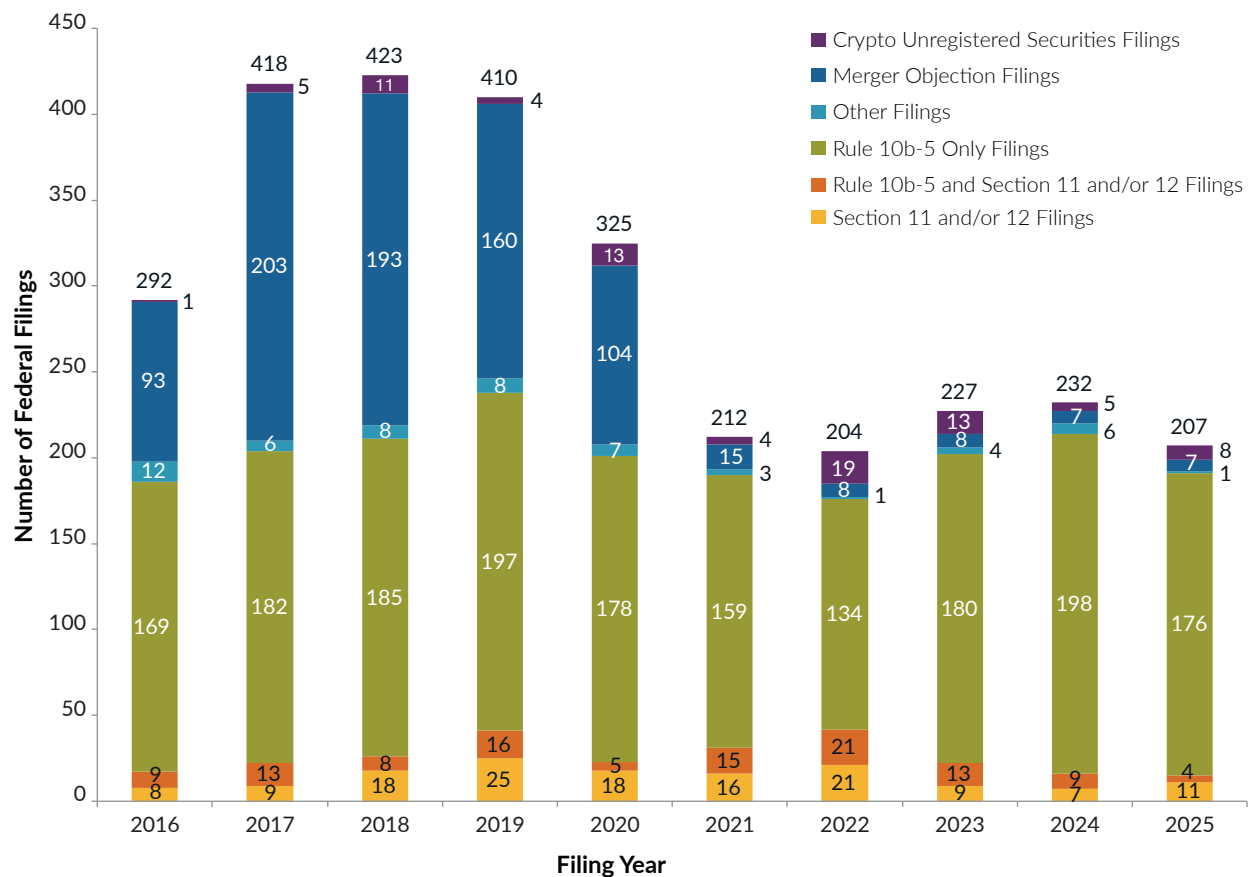
Figure 1. **Federal Filings and Number of Companies Listed in the United States**
January 1996–December 2025



Note: Listed companies include those listed on the NYSE and Nasdaq. Listings data obtained from the World Federation of Exchanges (WFE). The 2025 listings data are as of November 2025.

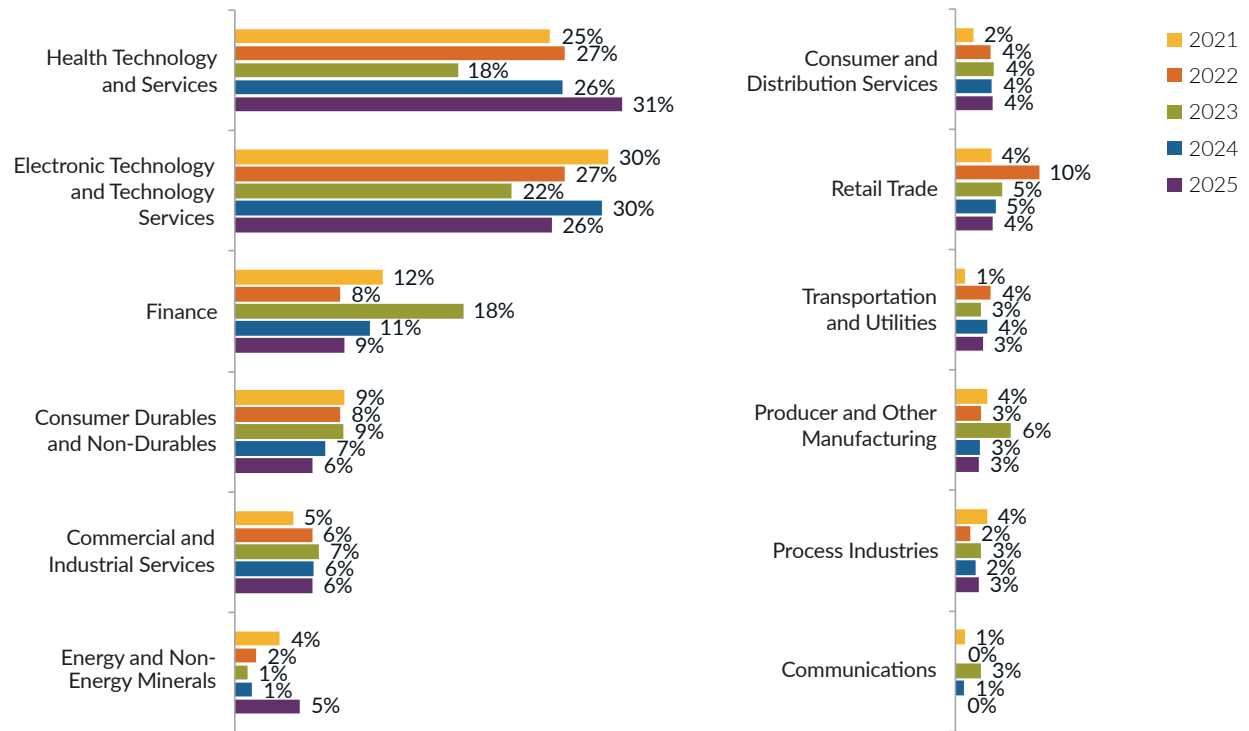
Standard cases, which contain alleged violations of Rule 10b-5, Section 11, and/or Section 12, comprised 92% of all new filings with 191 cases, 23 less than in 2024.⁴ Among these, there were 176 filings with Rule 10b-5-only claims, representing an 11% decline from 2024. Standard cases with Section 11 and/or Section 12 claims (with or without an accompanying Rule 10b-5 claim) declined for the third straight year, with 15 such filings in 2025, the lowest level in the past decade. This trend is partially due to the low number of US IPOs over 2022–2024, which saw between 154 and 225 IPOs per year, compared to the 480 and 1,035 IPOs seen in 2020 and 2021, respectively.⁵ Merger objection filings were flat in 2025 with seven, while there was an uptick in suits involving crypto unregistered securities, with eight in 2025, up from five in 2024.⁶ See Figure 2.

Figure 2. **Federal Filings by Type**
January 2016–December 2025



After excluding merger-objection and crypto unregistered securities cases, the healthcare technology and services sector accounted for 31% of new filings in 2025, the highest share seen among all sectors during the 2021–2025 period, while the electronic technology and technology services sector, the leading sector in 2024, comprised 26% of new filings, a four percentage point decline from the 30% observed the year before. The percentage of suits in the finance sector decreased for the second straight year to 9% in 2025 from 11% in 2024. Meanwhile, the share of filings in the energy and non-energy minerals sector more than tripled in 2025 and accounted for 5% of all filings, a five-year high. See Figure 3.

Figure 3. **Percentage of Federal Filings by Sector and Year**
Excludes Merger Objections and Crypto Unregistered Securities
January 2021–December 2025

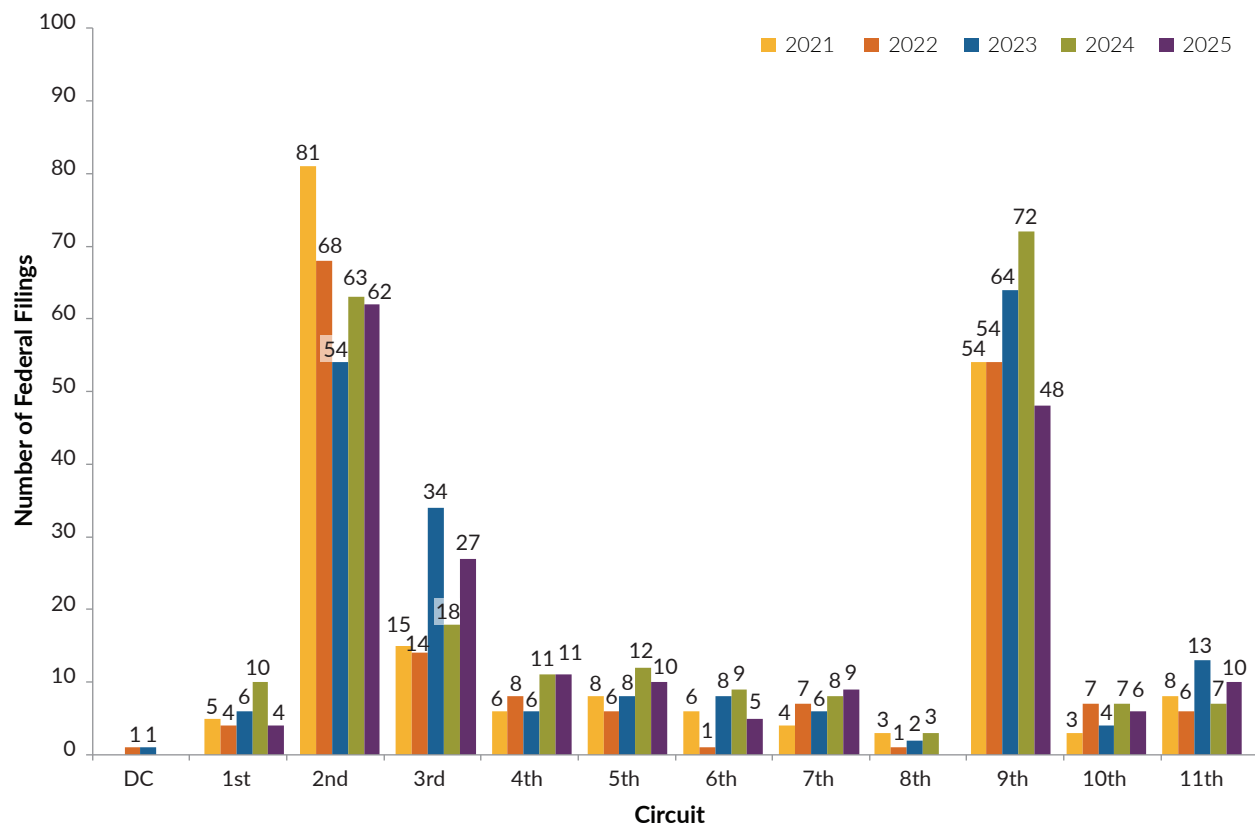


Note: This analysis is based on the FactSet Research Systems, Inc. economic sector classification. Some of the FactSet economic sectors are combined for presentation.

The Second and Ninth Circuits continue to be the jurisdictions in which the majority of non-merger objection, non-crypto unregistered securities cases are filed, although their combined share of filings declined from 61% in 2024 to 57% in 2025. There were 62 new filings in the Second Circuit, nearly matching its 2024 total, while the Ninth Circuit experienced a 33% decline in new filings relative to 2024 with 48 new filings, the lowest number in the past five years. Filing trends in these circuits can be explained by the number of suits filed in district courts in the states of New York and California, respectively. While suits filed in New York district courts only slightly declined from 62 filings in 2024 to 59 filings in 2025, filings in California district courts fell by 24 filings, from 65 in 2024 to 41 in 2025. On the other hand, filings in the Third Circuit increased by 50% to 27 filings from 18 filings in 2024. The growth in Third Circuit filings was due to a substantial influx of new cases filed in the District of New Jersey, which saw 16 filings in 2025, up from six in 2024. Notably, the Fourth and Fifth Circuits each saw at least 10 suits filed for the second year in a row, and the Eleventh Circuit also recorded 10 filings in 2025. See Figure 4.

Figure 4. **Federal Filings by Circuit and Year**

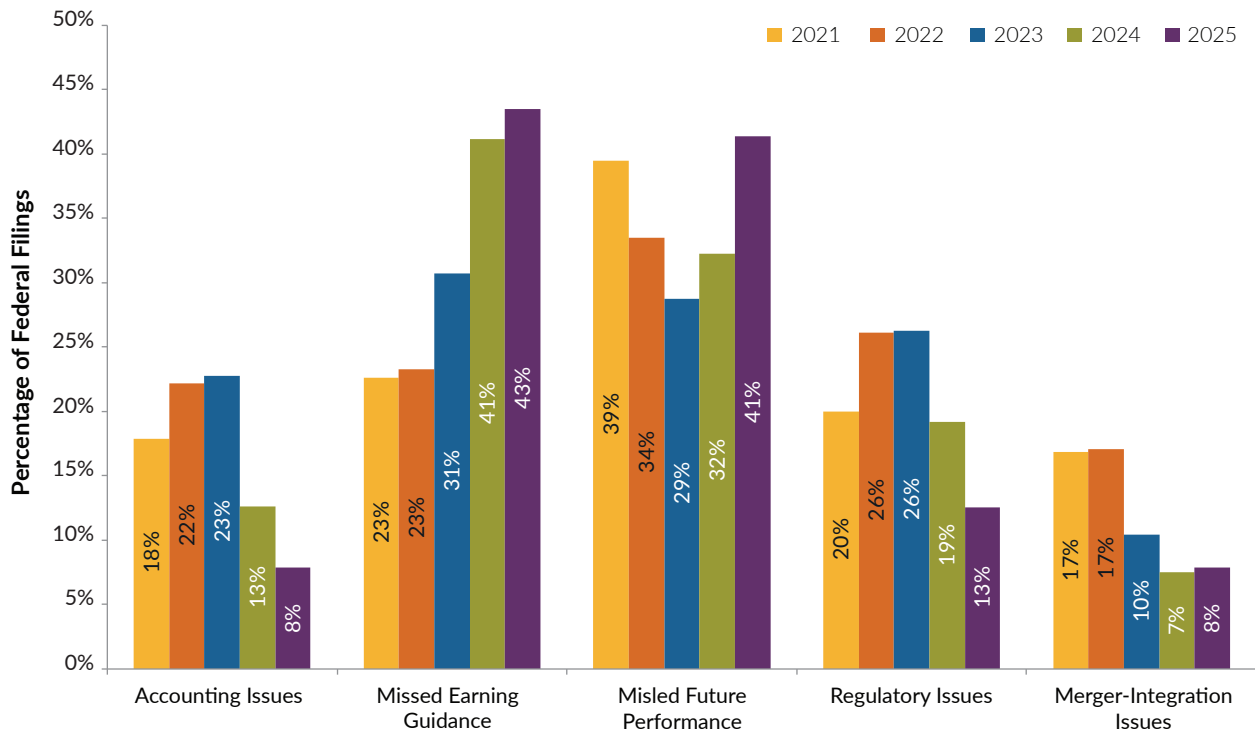
Excludes Merger Objections and Crypto Unregistered Securities
January 2021–December 2025



Among standard filings, 43% included an allegation related to missed earnings guidance and 41% included an allegation related to misled future performance, by far the most common allegations seen in 2025.⁷ The percentage of standard cases with accounting-related allegations declined for a second consecutive year to 8%, down from nearly a quarter of all standard cases filed in 2023, while the percentage of standard cases containing an allegation related to regulatory issues has also declined by half to 13% from 26% in 2023. See Figure 5.

Figure 5. **Allegations in Federal Filings**

Shareholder Class Actions with Alleged Violations of Rule 10b-5, Section 11, and/or Section 12
January 2021–December 2025



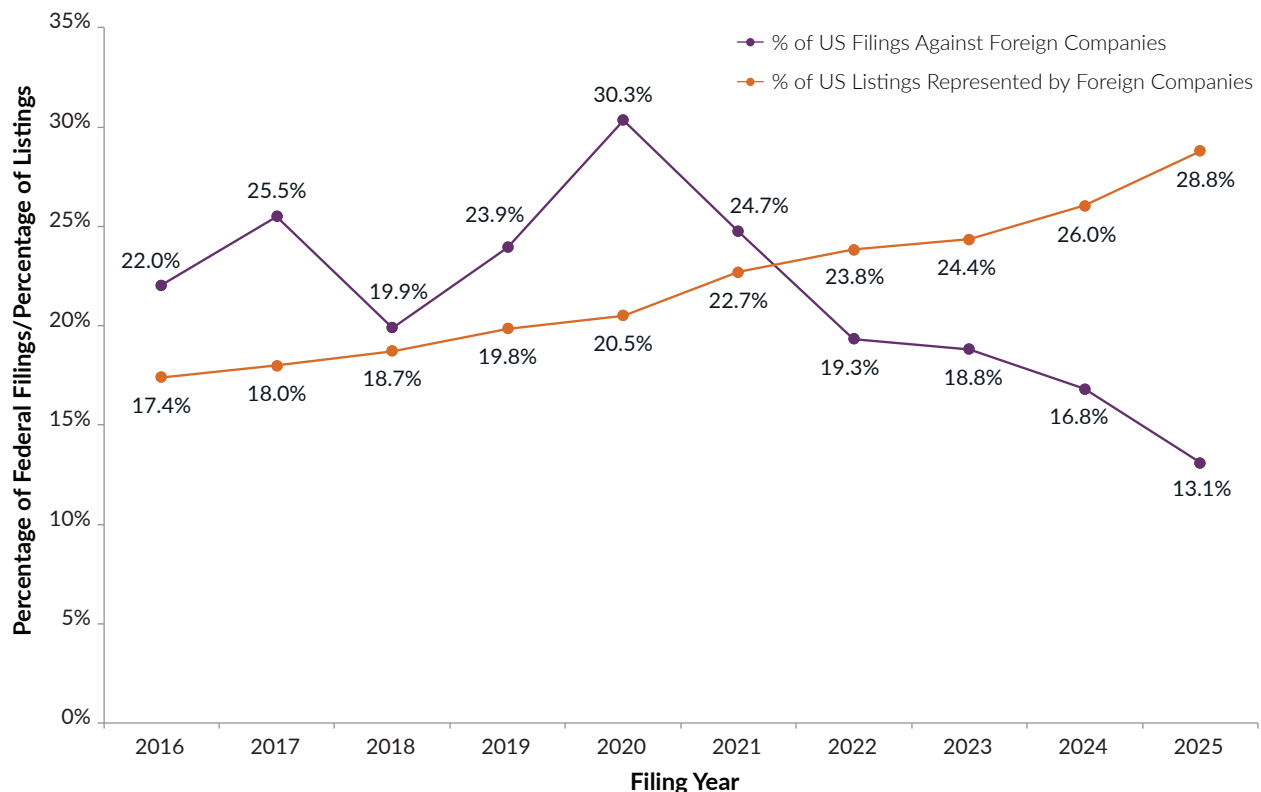
The percentage of standard cases containing an allegation related to regulatory issues has declined by half.

FILINGS AGAINST FOREIGN COMPANIES

From 2016 to 2021, the percentage of foreign companies with securities listed on the NYSE and the Nasdaq increased by 5.3 percentage points, from 17.4% in 2016 to 22.7% in 2021. Over the same period, foreign companies were targeted with standard securities class actions at a higher rate than their proportion of US listings.⁸ For instance, in 2016, 22.0% of standard cases were filed against foreign companies, while in 2021, this percentage grew to 24.7%.

Although the percentage of foreign companies listed on major US stock exchanges has continued to increase since 2021, the share of federal standard filings against foreign companies has since dropped below their proportion of US listings. While 28.8% of US listings were represented by foreign companies in 2025, a 6.1 percentage point increase from 2021, only 13.1% of standard filings were against foreign companies, the lowest share over the past decade. See Figure 6.

Figure 6. **Foreign Companies: Share of Federal Filings and Share of Companies Listed on US Exchanges**
Shareholder Class Actions with Alleged Violations of Rule 10b-5, Section 11, and/or Section 12
January 2016–December 2025

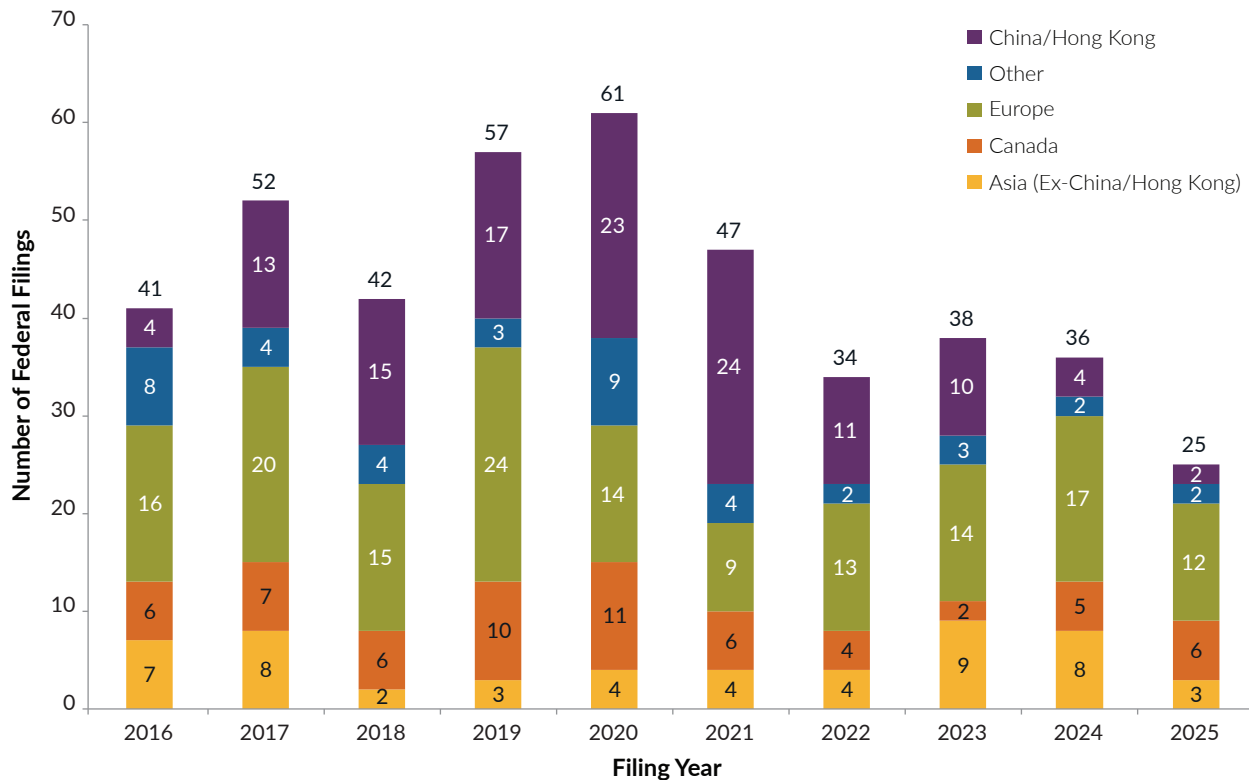


Note: Country of foreign issuer is determined based on location of principal executive offices.

In 2025, 25 standard cases were filed against foreign companies, a 31% reduction from the 36 suits filed in 2024. This decline was mostly due to a decrease in filings targeting companies based in Europe and Asia. Nearly half of these filings were against European companies, with five cases against companies based in the United Kingdom and two against companies based in Ireland, while another six cases were filed against Canadian companies. Suits against companies based in China or Hong Kong declined for a fourth consecutive year, with only two filings seen in 2025. Elsewhere, there were two suits filed against companies in each of Australia and Israel.

Figure 7. **Federal Filings Against Foreign Companies**

Shareholder Class Actions with Alleged Violations of Rule 10b-5, Section 11, and/or Section 12 by Region
January 2016–December 2025



Note: Country of foreign issuer is determined based on location of principal executive offices.

Among standard filings against foreign companies in 2025, 40% included allegations related to missed earnings guidance and 32% included allegations related to misled future performance, both lower than the analogous rates of 44% and 43% for standard filings against US companies. Foreign companies were more likely to face allegations related to accounting issues, with 16% targeting foreign companies compared with 7% targeting US companies. See Figure 8.

Figure 8. **Allegations in Federal Filings by US and Foreign Companies**

Shareholder Class Actions with Alleged Violations of Rule 10b-5, Section 11, and/or Section 12
January 2025–December 2025



Note: Country of foreign issuer is determined based on location of principal executive offices.

Foreign companies were more likely to face allegations related to accounting issues.

EVENT-DRIVEN AND OTHER SPECIAL CASES

Trends in filings in potential development areas we have identified for securities class actions over the past five years are shown in Figures 9 and 10.

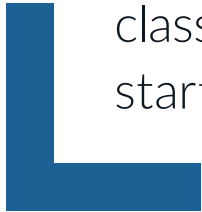
Tariff- and Visa-Related Cases

In 2025, the Trump Administration enacted a series of tariffs via executive orders, some of which were delayed, reversed, expanded, or renegotiated over the course of the year.⁹ Over the same period, the effective US tariff rate rose from 2.3% in December 2024 to 15.8% as of August 2025.¹⁰ As the economic impact due to changes in US trade policy begins to play out, securities class actions with US tariff-related claims have started to appear. The first such case was filed on 29 August 2025 against Dow Inc. over alleged misrepresentations regarding its ability to mitigate macroeconomic and tariff-related headwinds.¹¹ Subsequent filings include suits against Tronox Holdings Plc, following a decline in sales of titanium oxide and zircon products associated in part to tariff-related uncertainties,¹² and CarMax, Inc., in which the company is alleged to have overstated its long-term growth prospects following an earlier short-term surge in demand due to anticipated tariffs.¹³

Separately, recent worldwide changes in immigration and visa policies have also led to one securities class action filed involving Flywire Corporation, in which the company is alleged to have understated the negative impact international student permit- and visa-related restrictions in Canada and Australia would have on the company's business.¹⁴

Crypto Cases

Since 2016, when the first crypto-related suit was filed against GAW Miners, LLC,¹⁵ there have been 126 crypto-related filings, which comprise (1) cases involving unregistered securities and (2) standard shareholder suits involving companies operating in or adjacent to the cryptocurrency industry. There were 14 crypto-related filings in 2025, representing 7% of all federal filings in 2025 and nearly double the number of such filings in 2024. Eight suits involved unregistered securities, and six were traditional shareholder suits.



As the economic impact due to changes in US trade policy begins to play out, securities class actions with US tariff-related claims have started to appear.



Figure 9. **Number of Crypto Federal Filings**
January 2016–December 2025



Artificial Intelligence

As companies increasingly discuss artificial intelligence (AI) in their SEC filings, earnings calls, and public disclosures, there has been a rise in AI-related securities class action cases, in which companies are alleged to have misrepresented the use or effectiveness of their AI capabilities or to have failed to disclose risks associated with adopting AI in their business.¹⁶ In 2025, there were 17 AI-related filings, representing 8% of all federal filings and slightly exceeding the 16 such suits seen in 2024. While 13 AI-related cases were filed in the first half of 2025,¹⁷ the pace of AI-related filings slowed in the second half of the year, with only three suits filed in the third quarter¹⁸ and only one suit filed in the fourth quarter.

SPAC

Since their peak in 2021, filings related to special purpose acquisition companies (SPACs) have declined for the fourth consecutive year. There were only five SPAC-related filings in 2025, an 86% decline from the 36 suits filed in 2021. While recent SPAC IPO activity remains well below the level seen in 2021, it has been trending higher, with 144 SPAC IPOs in 2025 compared to 57 in 2024 and 31 in 2023.¹⁹

COVID-19

There have been 107 securities class actions filed with COVID-19-related claims, with at least 20 cases filed each year between 2020 and 2022. After a dip in filings in 2023, COVID-19-related filings surged in 2024 with 19 such suits but have since declined to just three filings in 2025, with only one suit filed in the second half of the year.

Cybersecurity and Customer Privacy Breach

During the last five years, there have been 19 securities class action suits with claims related to cybersecurity and/or customer privacy breaches. Twelve of these were filed in 2021–2022, while only two suits were filed in each of 2023 and 2024. There were three suits filed in 2025 against Fortinet, Inc., Coupang, Inc., and F5, Inc., all in the second half of the year.

Bribery/Kickbacks

There were three cases filed with allegations related to bribery or kickbacks in 2025, a slight uptick from the two seen in 2024. These include suits against TransMedics Group, Inc., RCI Hospitality Holdings, Inc., and SelectQuote, Inc.

Environment

While 2023 saw nine filings with environment-related claims, the highest number over the past five years, there were only two such suits in 2025, filed against Edison International and Sable Offshore Corporation, respectively.

Money Laundering

Only one suit related to money laundering was filed in 2025, a decline from two in 2024. This suit involved Block Inc. over allegations the company did not maintain robust anti-money laundering and other compliance protocols and procedures.²⁰

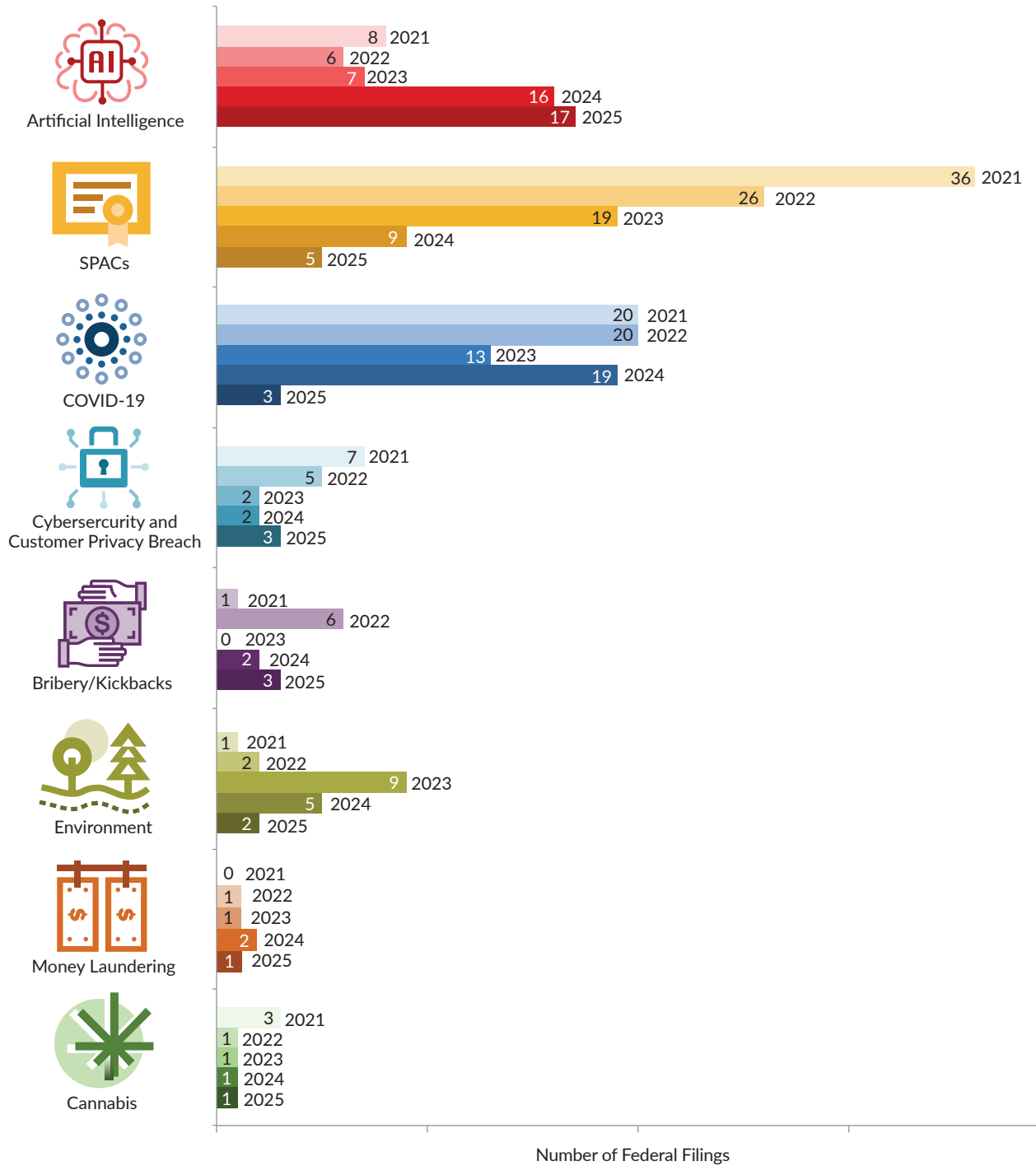
Cannabis

In 2021, there were three securities class action suits filed against defendants in the cannabis industry. Since then, there has been only one suit filed each year from 2022 to 2025.



After a dip in filings in 2023, COVID-19-related filings surged in 2024 with 19 such suits but have since declined to just three filings in 2025.

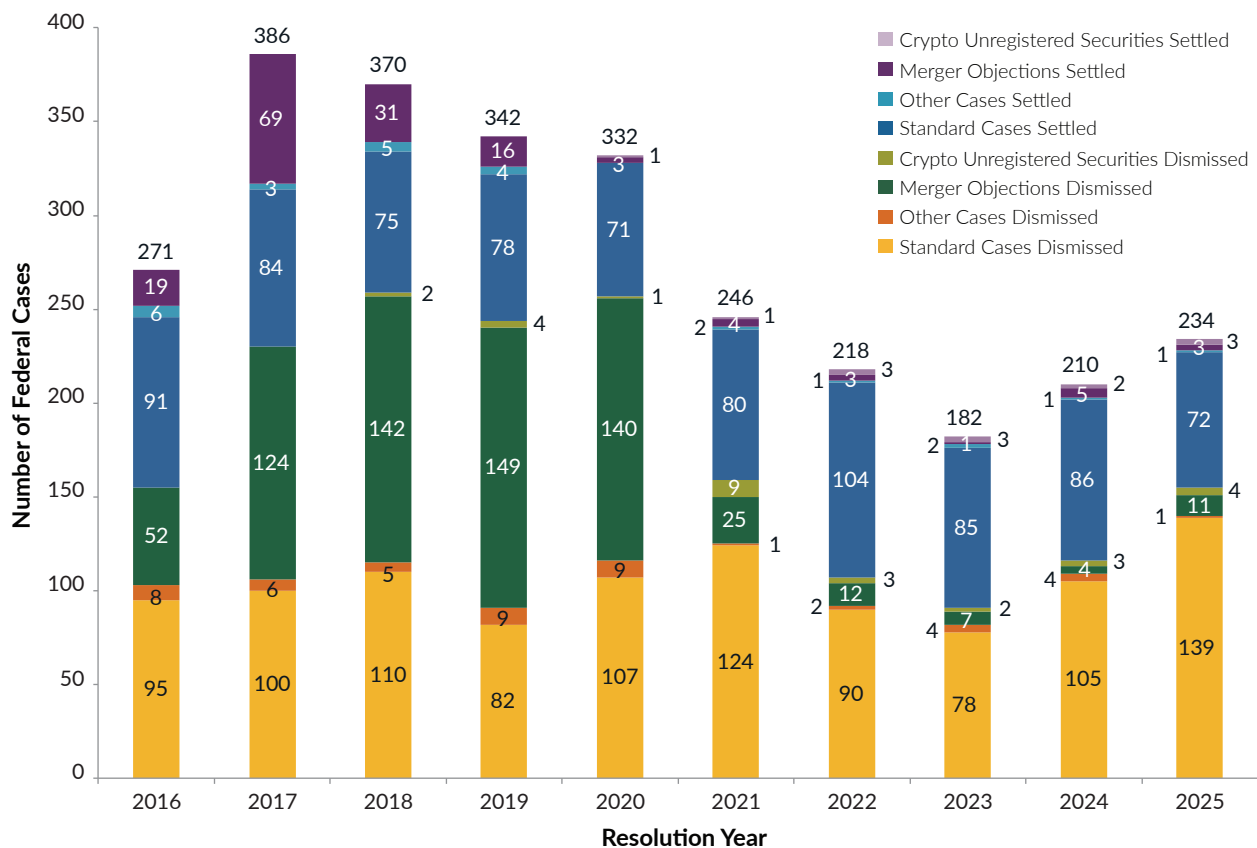
Figure 10. Event-Driven and Other Special Cases by Filing Year
January 2021–December 2025



TRENDS IN RESOLUTIONS

In 2025, the number of resolved federal securities class action cases, which includes dismissals and settlements, increased by 11% to 234 from 210 in 2024, marking the second straight year resolutions have increased.²¹ However, dismissals and settlements have trended in different directions. While the number of dismissals increased by 34% from 116 in 2024 to 155 in 2025, the number of settlements declined by 16% from 94 in 2024 to 79 in 2025. The rise in dismissals was largely driven by an increase in dismissals involving standard cases, which saw a record 139 dismissals in 2025, up 32% from 105 in 2024. There were 72 settlements involving standard cases in 2025, the lowest amount since 2020. Standard cases collectively accounted for 90% of resolutions, comprising 211 of 234 resolved cases, while merger objections accounted for another 6% of resolutions. See Figure 11.

Figure 11. Number of Resolved Cases: Dismissed or Settled
January 2016–December 2025

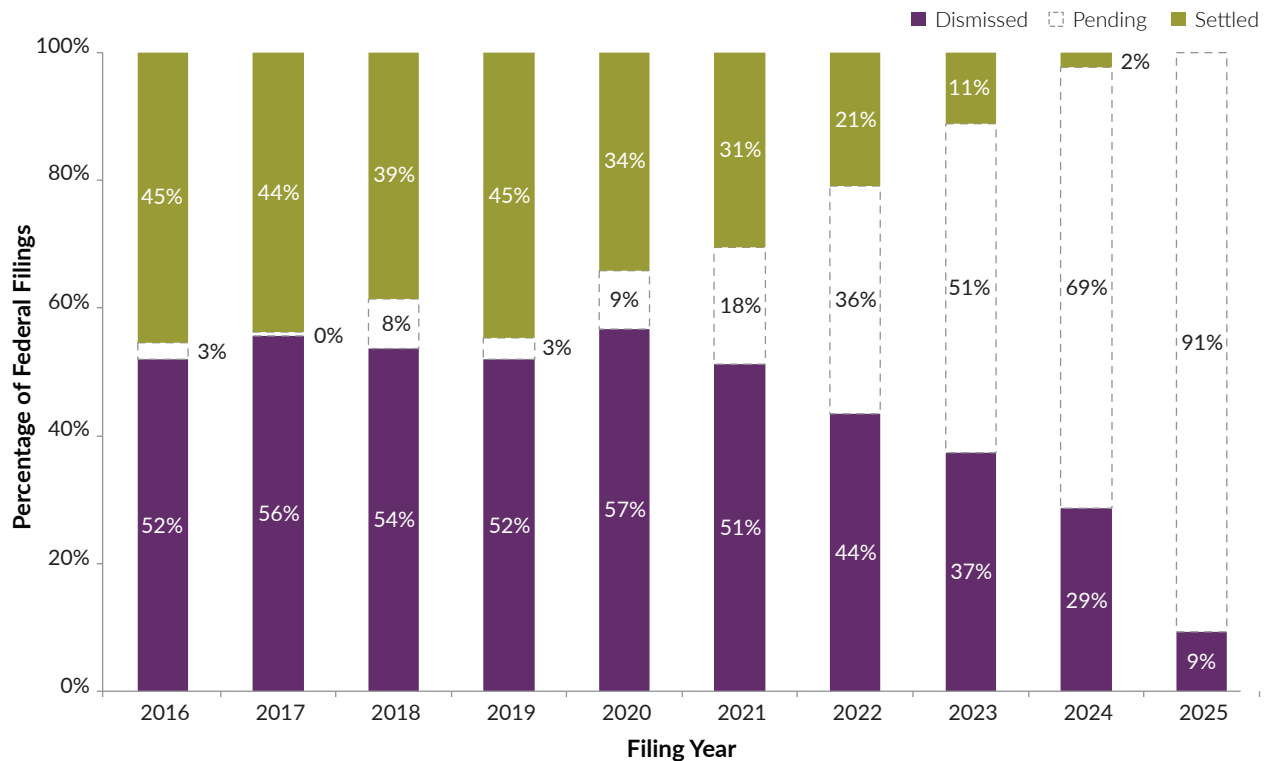


Among non-merger objection, non-crypto unregistered securities cases filed in the past 10 years, 44% of cases have been dismissed, 28% have settled, and 28% remain pending. This is consistent with historical trends, in which dismissals typically occur earlier in the litigation cycle, and settlements occur later. For the cases filed between 2016 to 2020, the rate of dismissal has ranged from 52% to 57%.

For cases filed in 2024, as of 31 December 2024, 7% were dismissed and 93% were pending.²² Of these cases, 18% were dismissed by 30 June 2025,²³ and as of 31 December 2025, 29% have been dismissed, 2% reached a settlement, and 69% remain pending. A higher proportion of cases filed in 2025 was dismissed in the year of filing than was true of cases filed in 2024, with 9% of cases filed in 2025 dismissed and 91% pending as of year-end 2025. See Figure 12.

Figure 12. **Status of Cases as Percentage of Federal Filings by Filing Year**

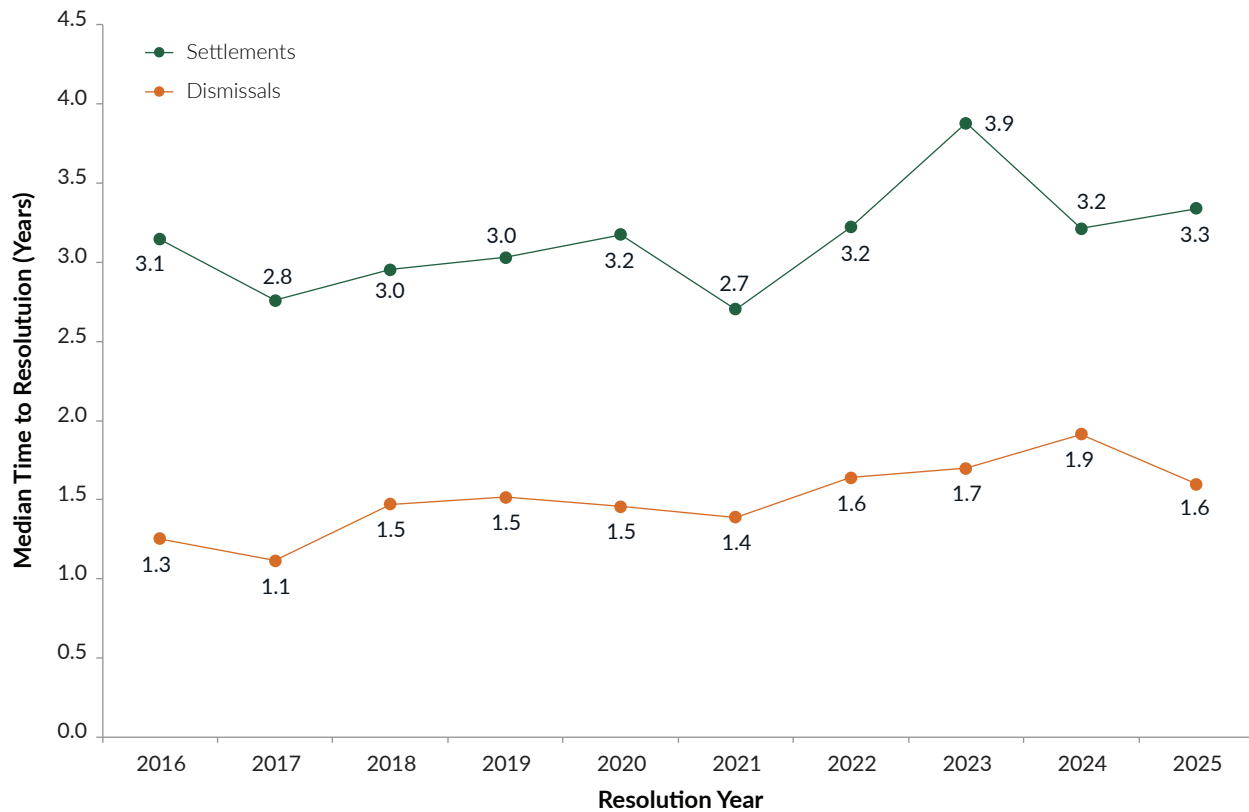
Excludes Merger Objections, Crypto Unregistered Securities, and Verdicts
January 2016–December 2025



Note: Dismissals may include dismissals without prejudice and dismissals under appeal. Component values may not add to 100% due to rounding.

Over the past 10 years, the median time from the filing of the first complaint to resolution for dismissed cases has ranged from 1.1 years to 1.9 years, while for settled cases, the median time from the filing of the first complaint to resolution has ranged from 2.7 years to 3.9 years. For cases dismissed in 2025, the median time to dismissal declined to 1.6 years from 1.9 years in 2024, largely driven by an increase in dismissals from more recently filed cases. For cases settled in 2025, the median time to settle was 3.3 years, roughly in line with 2024. See Figure 13.

Figure 13. **Median Time from First Complaint Filing to Resolution**
Excludes Merger Objections, Crypto Unregistered Securities, and Verdicts
January 2016–December 2025



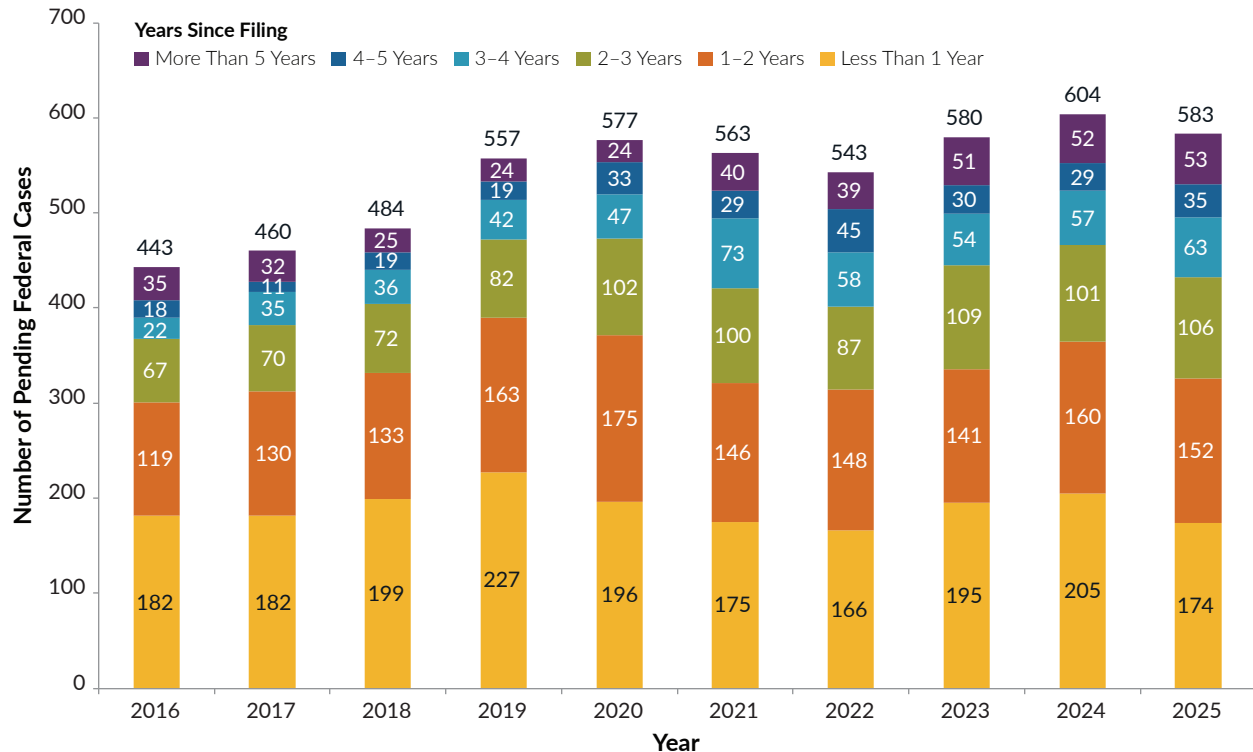
TRENDS IN PENDING CASES

The number of non-merger objection, non-crypto unregistered securities suits pending in federal courts has increased over the past 10 years, although year-to-year fluctuations in the filing rate of new cases and the resolution rate of existing cases have led to annual variations in the number of pending cases.²⁴ From 2016 to 2020, there were more new cases filed than existing cases resolved, resulting in a 30% increase in the number of pending cases, from 443 to 577. This trend reversed during the 2020–2022 period, leading to a reduction of 34 pending cases, while between 2022 and 2024, the backlog of securities class action cases grew by 11% to 604 cases. In 2025, the number of pending cases declined by 3.5% to 583. See Figure 14.

From 2020 to 2025, the percentage of pending cases that were filed within the past two years declined from 64% to 56%, while the percentage of cases that are older than three years increased from 18% to 26%. During the same period, the median age of pending cases increased from 1.5 years to 1.7 years. As of 31 December 2025, there were 53 cases that have been pending for more than five years, the most over the last decade.

Figure 14. **Number of Pending Federal Cases**

Excludes Merger Objections and Crypto Unregistered Securities
January 2016–December 2025



Note: Represents cases filed from 2000 onwards. Years since filing calculated are end-of-year calculations.

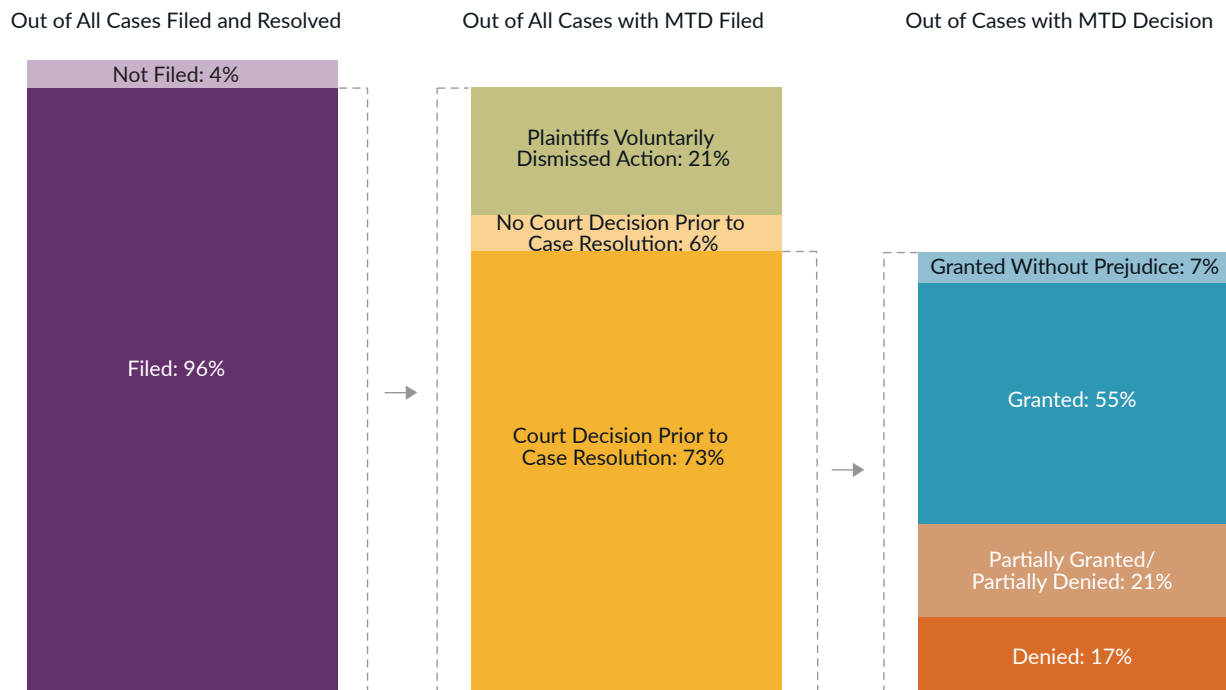
ANALYSIS OF MOTIONS

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

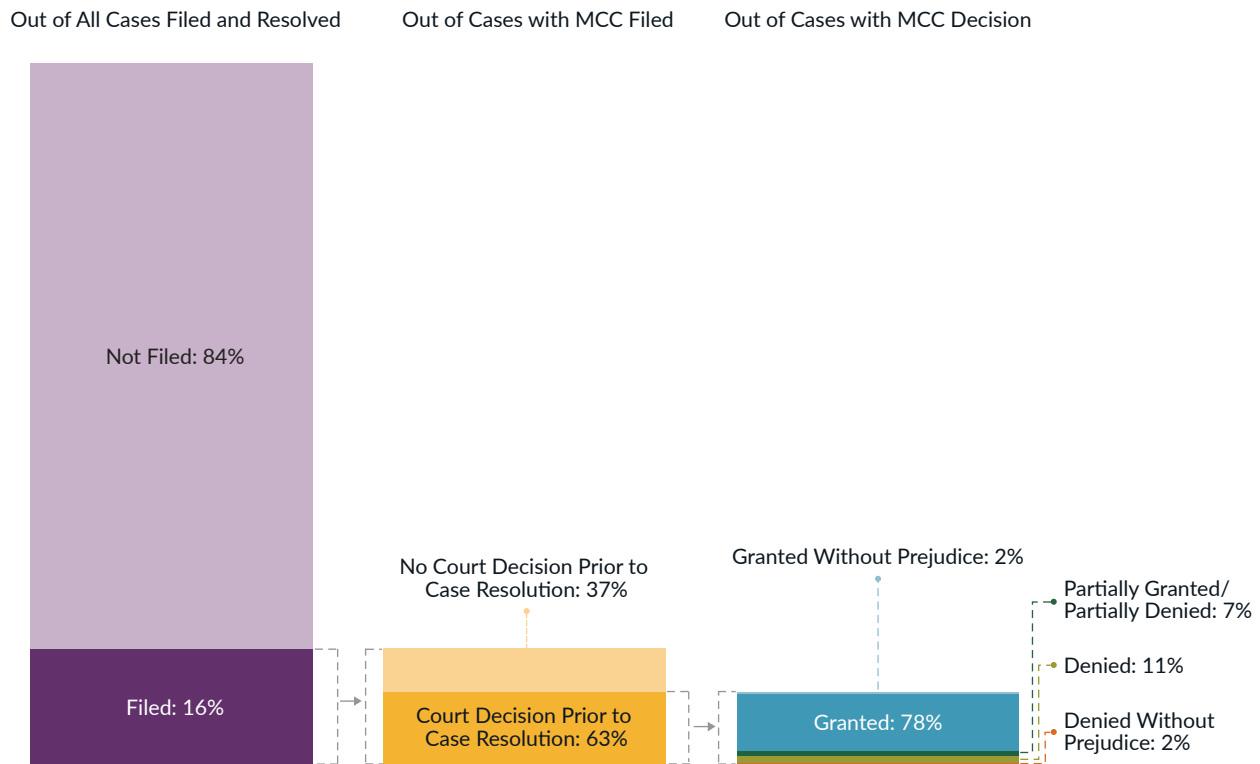
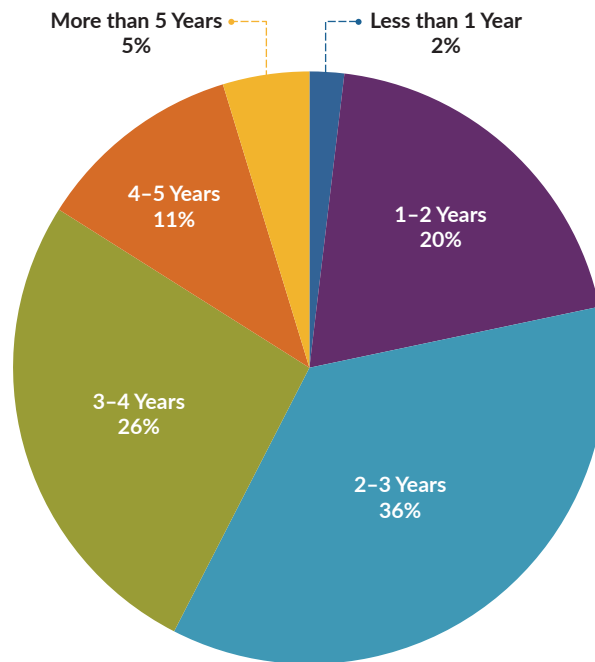


Figure 17. Time from First Complaint Filing to Class Certification Decision
Cases Filed and Resolved January 2016–December 2025



For cases in which a decision was reached on the motion for class certification...the median time is about 2.8 years.

TRENDS IN SETTLEMENT VALUES²⁵

For the third straight year, the aggregate recovery from settlements has declined. The 2025 aggregate settlement value was \$2.9 billion, marking a 25% decline from the inflation-adjusted 2024 total of \$3.9 billion and a 33% decline from the inflation-adjusted 2021 total of \$4.4 billion (see Figure 18). After excluding cases involving merger objections, crypto unregistered securities, and settlements of \$0 to the class, 40% of settlements had a recovery of less than \$10 million (in line with the prior three years), 13% settled between \$10 million and \$19.9 million (a five-year low), 31% settled between \$20 million and \$49.9 million (a five-year high), and 17% settled for \$50 million or more (see Figure 19). The average settlement value was \$40 million, a 9% decline compared to the 2024 inflation-adjusted average settlement value of \$44 million but a 63% increase from the smallest inflation-adjusted average settlement value in the past 10 years: \$24.4 million in 2021 (see Figure 20).²⁶

Figure 18. **Aggregate Settlement Value**
January 2016–December 2025

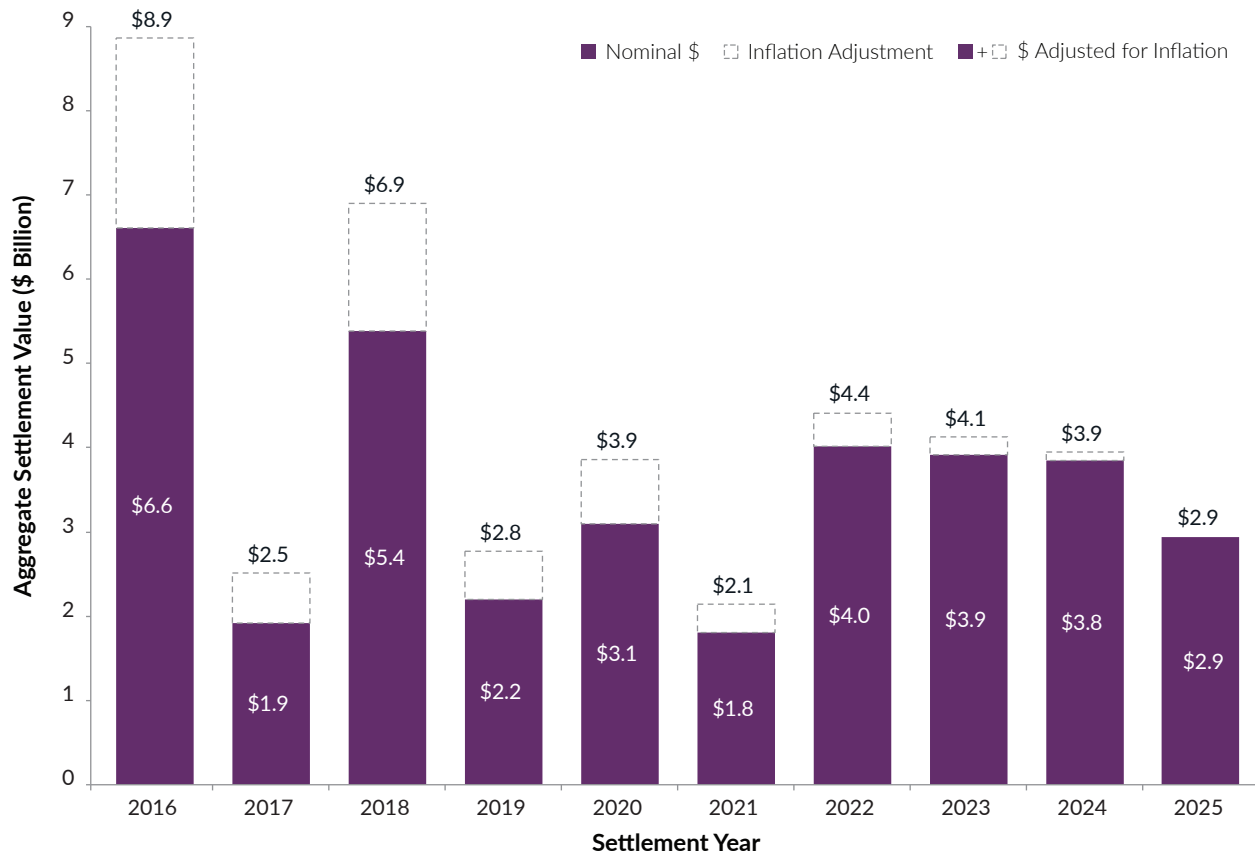


Figure 19. Distribution of Settlement Values

Excludes Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class
January 2021–December 2025

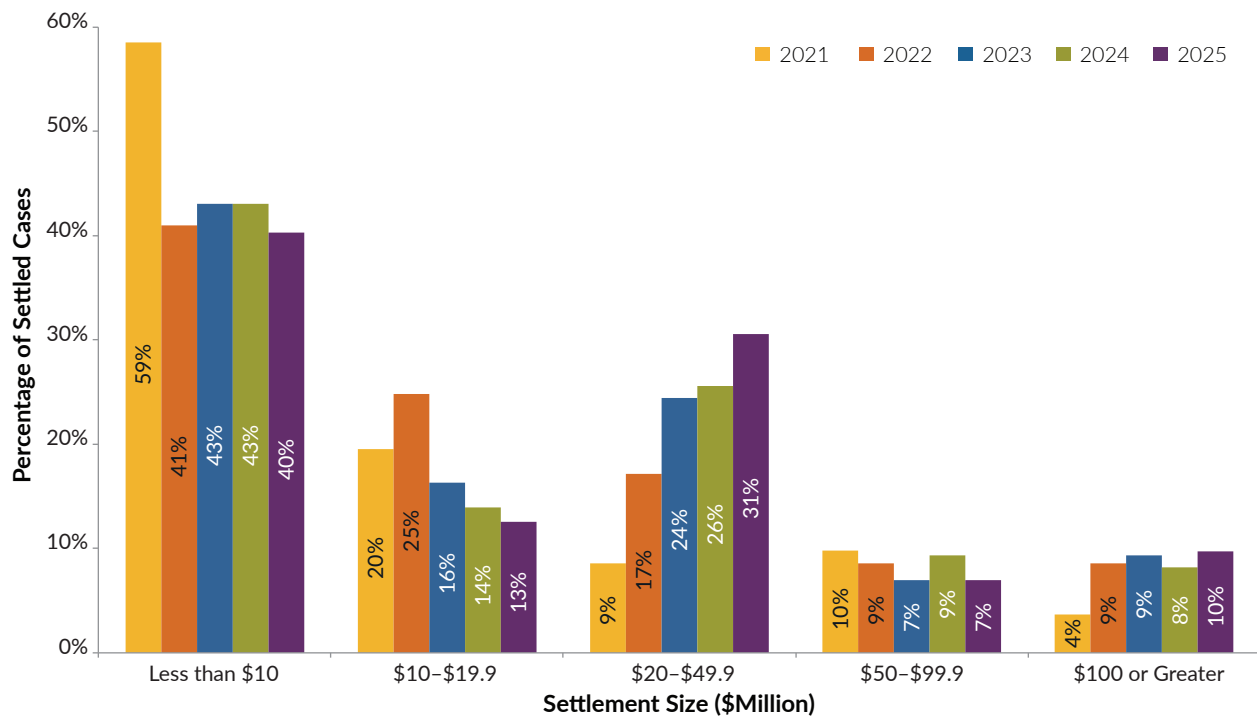
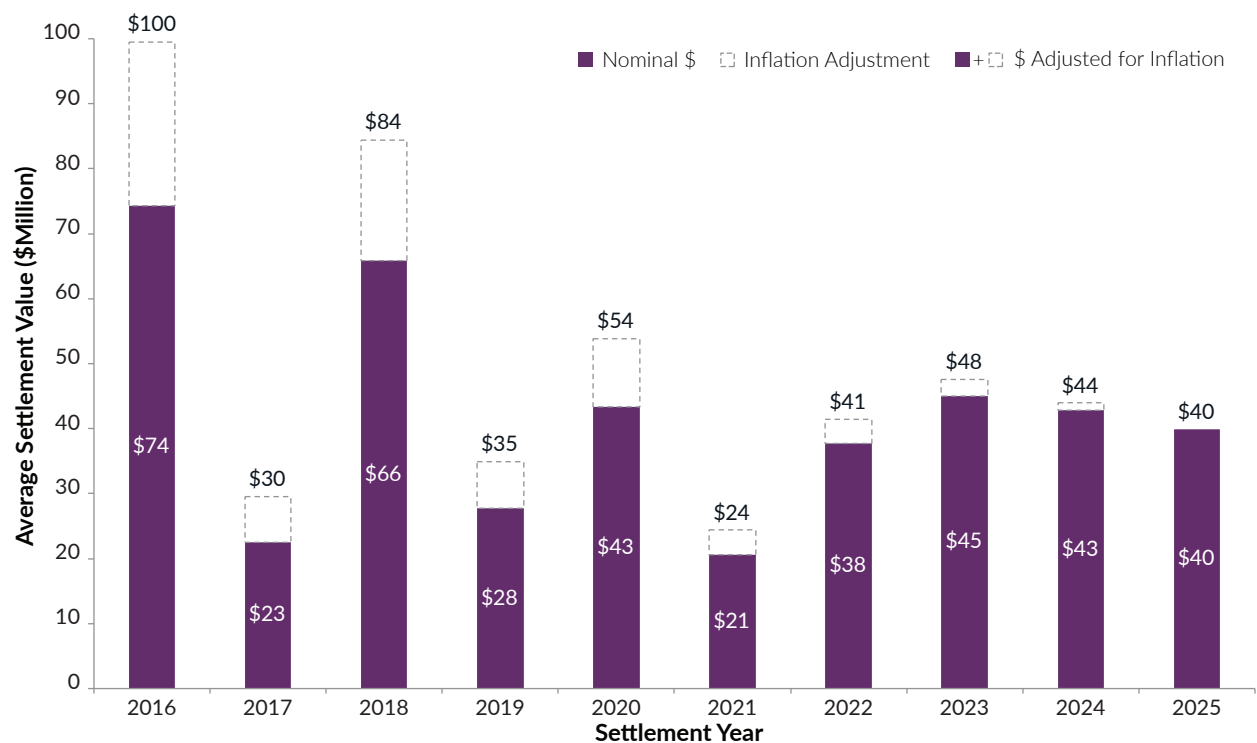


Figure 20. Average Settlement Value

Excludes Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class
January 2016–December 2025



For the second year in a row, there were no settlements of \$1 billion or higher, and as a result, the average settlement value excluding such cases was also \$40 million (see Figure 21). The median settlement value was \$17.3 million, a 21% increase relative to the \$14.3 inflation-adjusted value in 2024 and the largest median settlement value over the 2016–2025 period (see Figure 22).

Figure 21. **Average Settlement Value**

Excludes Settlements of \$1 Billion or Higher, Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class
January 2016–December 2025

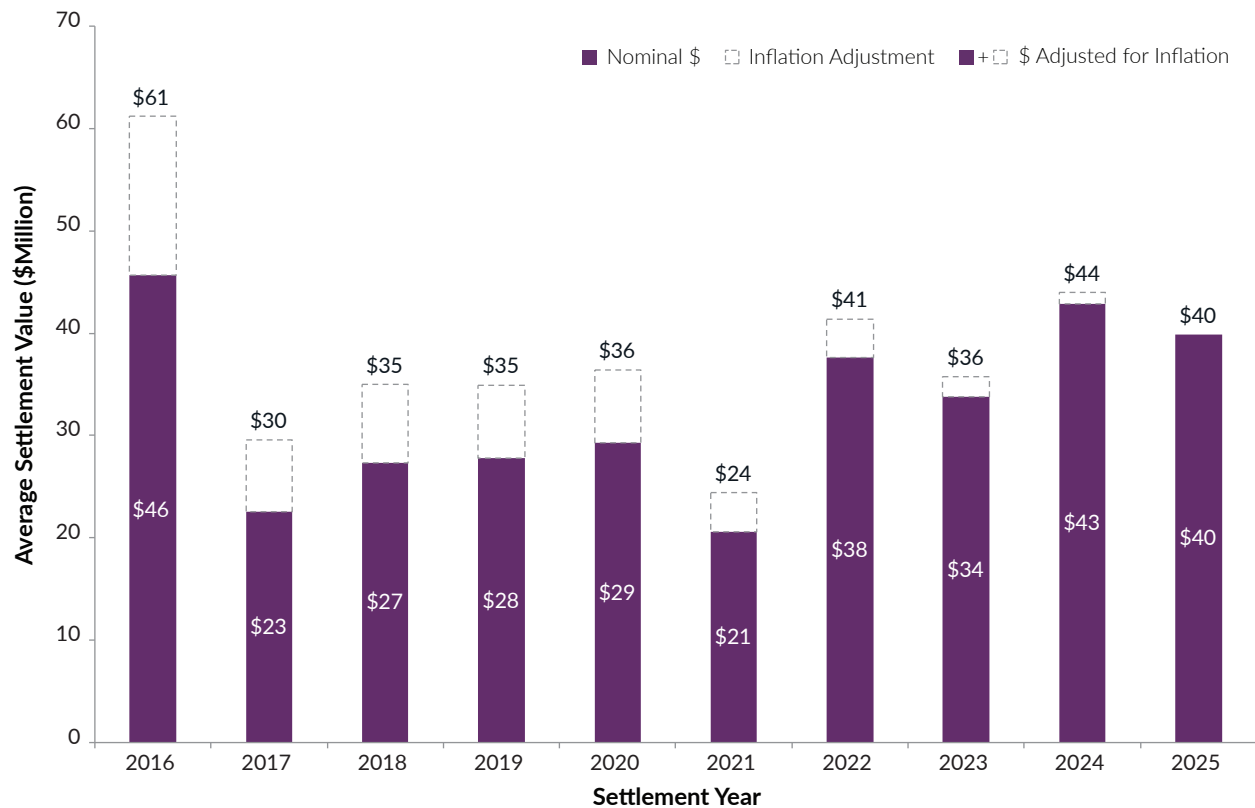
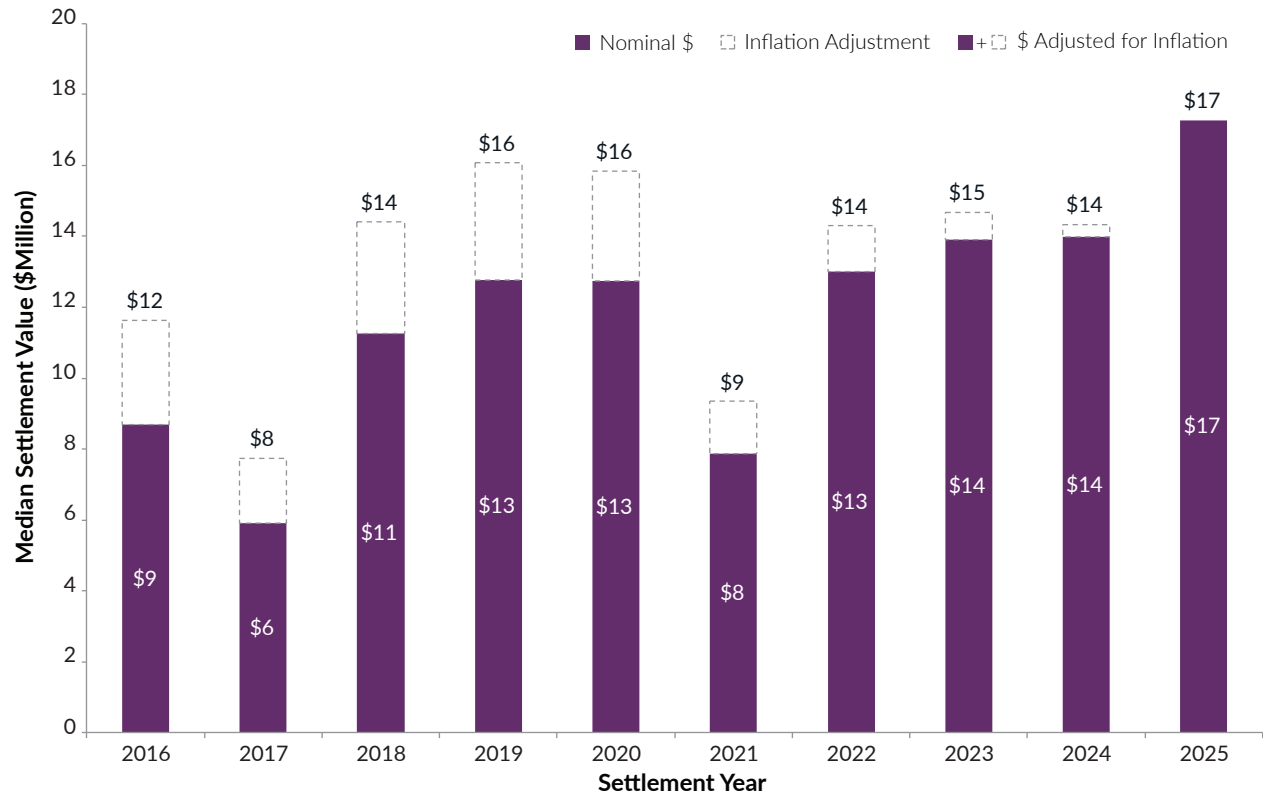


Figure 22. **Median Settlement Value**

Excludes Settlements of \$1 Billion or Higher, Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class
January 2016–December 2025



The median settlement value was \$17.3 million, a 21% increase relative to the \$14.3 inflation-adjusted value in 2024 and the largest median settlement value over the 2016–2025 period.

TOP SETTLEMENTS

The 10 largest settlements of 2025 ranged from \$80 million to \$433.5 million and together accounted for \$1.7 billion, or 59%, of the \$2.9 billion aggregate settlement amount. There were three settlements over \$150 million: Alibaba Group Holding Company (\$433.5 million) over misrepresentations concerning its exclusivity practices,²⁷ General Electric Company (\$362.5 million) over disclosure failures related to the use of factoring to conceal industrial cash flow issues,²⁸ and EQT Corporation (\$167.5 million) over allegations the company overstated the operational benefits of its acquisition of Rice Energy Inc.²⁹ The Second Circuit alone accounted for five of the 10 largest settlements. Eight of the top 10 settlements took more than five years to resolve from the filing of the first complaint. See Table 1.

Table 1. **Top 10 2025 Securities Class Action Settlements**

| Rank | Defendant | Filing Date | Settlement Date | Total Settlement Value (\$Million) | Plaintiffs' Attorneys' Fees and Expenses Value (\$Million) | Circuit | Economic Sector |
|--------------|---|-------------|-----------------|------------------------------------|--|---------|-----------------------|
| 1 | Alibaba Group Holding Limited | 13 Nov 2020 | 27 Mar 2025 | \$433.5 | \$109.4 | 2nd | Retail Trade |
| 2 | General Electric Company | 01 Nov 2017 | 24 Apr 2025 | \$362.5 | \$79.5 | 2nd | Electronic Technology |
| 3 | EQT Corporation | 25 Jun 2019 | 30 Oct 2025 | \$167.5 | \$55.1 | 3rd | Energy Minerals |
| 4 | Zoom Video Communications, Inc. | 07 Apr 2020 | 09 Oct 2025 | \$150.0 | \$10.7 | 9th | Technology Services |
| 5 | Turquoise Hill Resources Ltd. | 14 Oct 2020 | 15 Oct 2025 | \$138.8 | \$20.0 | 2nd | Non-Energy Minerals |
| 6 | Alta Mesa Resources, Inc. | 30 Jan 2019 | 30 Apr 2025 | \$126.3 | \$47.7 | 5th | Energy Inc. Minerals |
| 7 | VMware, Inc. | 31 Mar 2020 | 31 Mar 2025 | \$102.5 | \$26.4 | 9th | Technology Services |
| 8 | Windstream Holdings, Inc. /EarthLink Holdings Corp. | 19 Mar 2018 | 06 Feb 2025 | \$85.0 | \$27.8 | 8th | Communications |
| 9 | Dentsply Sirona Inc. | 19 Dec 2018 | 10 Sep 2025 | \$84.0 | \$25.8 | 2nd | Health Technology |
| 10 | Grab Holdings Limited | 16 Mar 2022 | 15 May 2025 | \$80.0 | \$26.9 | 2nd | Transportation |
| Total | | | | \$1,730.1 | \$429.3 | | |

Table 2 lists the 10 largest federal securities class action settlements through 31 December 2025. Since the Valeant Pharmaceuticals partial settlement of \$1.2 billion in 2020, this list has remained unchanged, with settlements ranging from \$1.1 to \$7.2 billion.

Table 2. **Top 10 Federal Securities Class Action Settlements (As of 31 December 2025)**

| Rank | Defendant | Filing Date | Settlement Year(s) | Total Settlement Value (\$Million) | Financial Institutions Value (\$Million) | Accounting Firms Value (\$Million) | Plaintiffs' Attorney's Fees and Expenses Value (\$Million) | Circuit | Economic Sector |
|--------------|--|--------------|--------------------|------------------------------------|--|------------------------------------|--|---------|------------------------|
| 1 | ENRON Corp. | 22 Oct 2001 | 2003–2010 | \$7,242 | \$6,903 | \$73 | \$798 | 5th | Industrial Services |
| 2 | WorldCom, Inc. | 30 Apr 2002 | 2004–2005 | \$6,196 | \$6,004 | \$103 | \$530 | 2nd | Communications |
| 3 | Cendant Corp. | 16 Apr 1998 | 2000 | \$3,692 | \$342 | \$467 | \$324 | 3rd | Finance |
| 4 | Tyco International, Ltd. | 23 Aug 2002 | 2007 | \$3,200 | No codefendant | \$225 | \$493 | 1st | Producer Manufacturing |
| 5 | Petroleo Brasileiro S.A.-Petrobras | 8 Dec 2014 | 2018 | \$3,000 | \$0 | \$50 | \$205 | 2nd | Energy Minerals |
| 6 | AOL Time Warner Inc. | 18 July 2002 | 2006 | \$2,650 | No codefendant | \$100 | \$151 | 2nd | Consumer Services |
| 7 | Bank of America Corp. | 21 Jan 2009 | 2013 | \$2,425 | No codefendant | No codefendant | \$177 | 2nd | Finance |
| 8 | Household International, Inc. | 19 Aug 2002 | 2006–2016 | \$1,577 | Dismissed | Dismissed | \$427 | 7th | Finance |
| 9 | Valeant Pharmaceuticals International, Inc.* | 22 Oct 2015 | 2020 | \$1,210 | \$0 | \$0 | \$160 | 3rd | Health Technology |
| 10 | Nortel Networks | 2 Mar 2001 | 2006 | \$1,143 | No codefendant | \$0 | \$94 | 2nd | Electronic Technology |
| Total | | | | \$32,334 | \$13,249 | \$1,017 | \$3,358 | | |

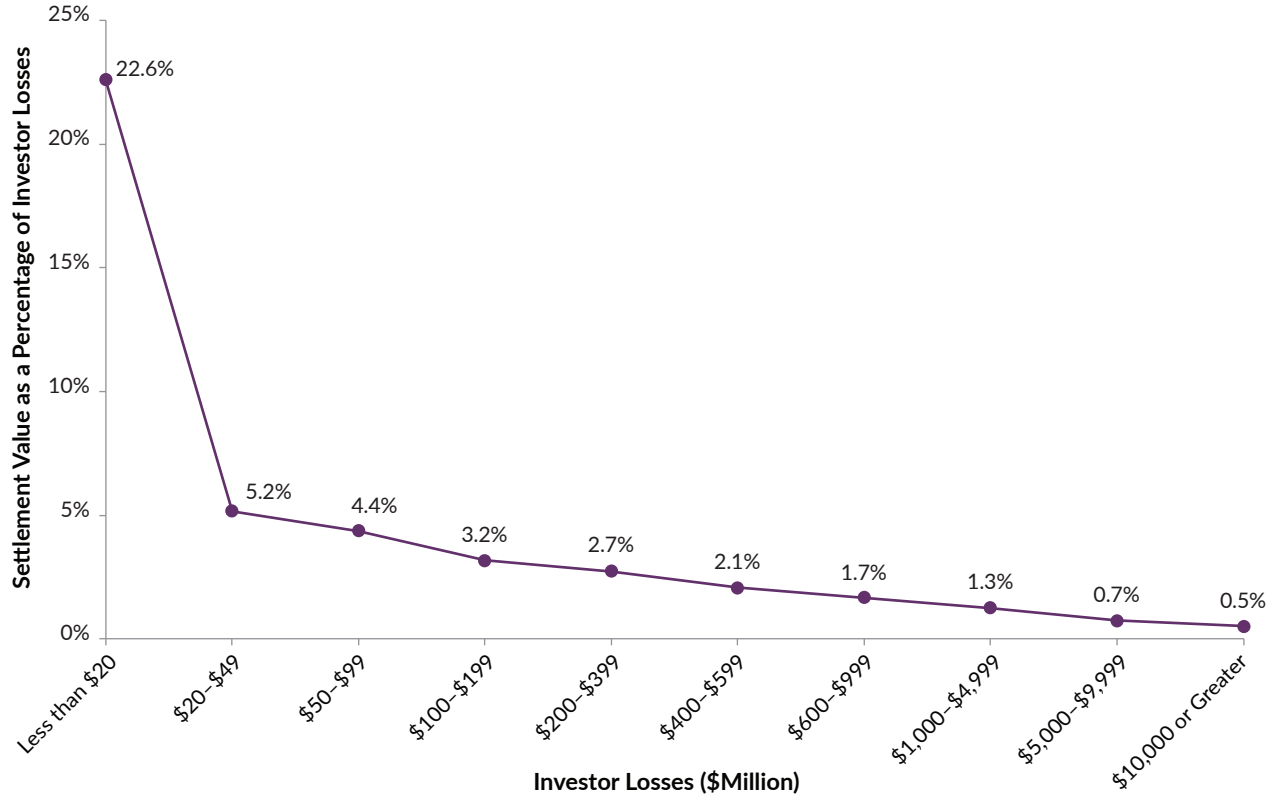
* Denotes a partial settlement, which is included here due to its sizeable amount. Note that this case is not included in any of our resolution or settlement statistics.

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

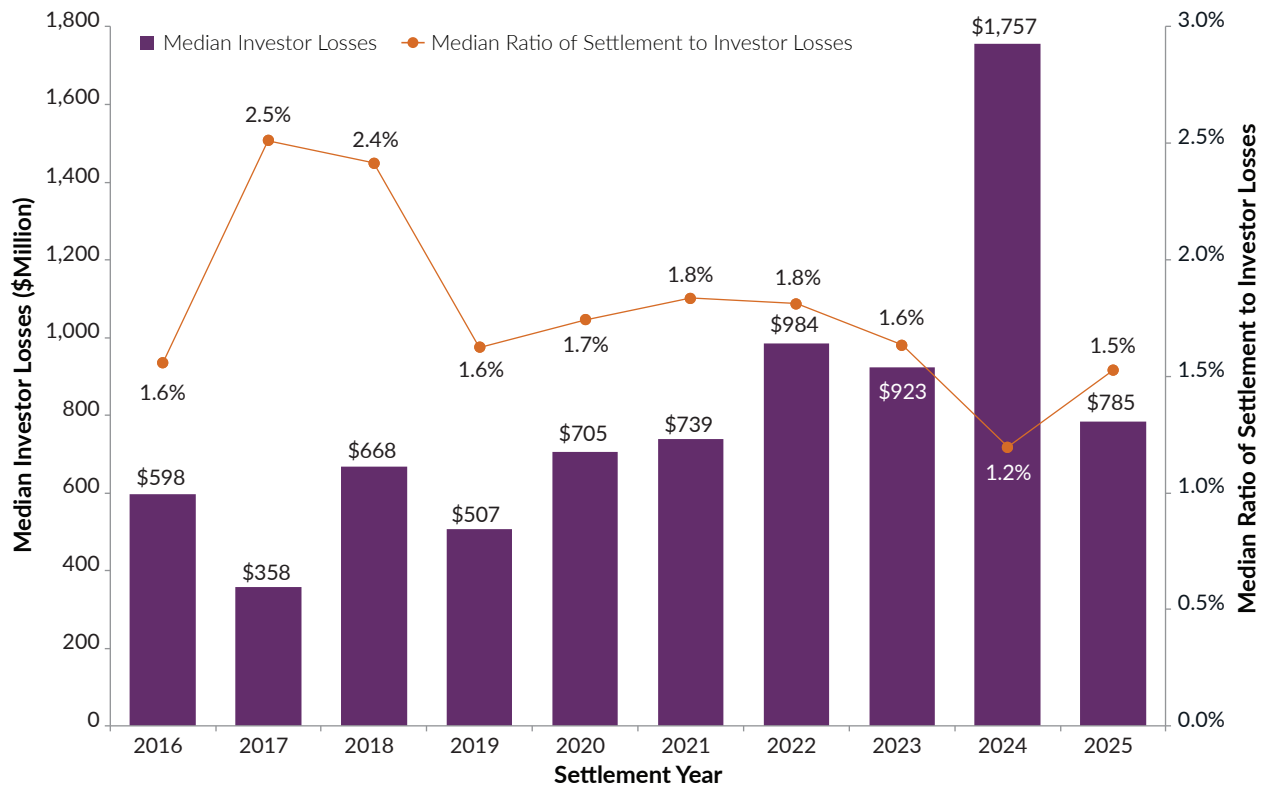
A statistical review reveals that, while settlement values and NERA-Defined Investor Losses are highly correlated, the relationship is not linear. The ratio of settlement value to NERA-Defined Investor Losses is higher for cases with lower Investor Losses than for cases with higher Investor Losses. For 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



Over the past decade, annual median Investor Losses have ranged from a low of \$358 million to a high of \$1.8 billion. For cases settled in 2025, the median Investor Losses were \$785 million, the lowest amount since 2021. The median ratio of settlement amount to Investor Losses was 1.5% in 2025, an increase relative to the 1.2% median ratio seen in 2024, though below the median ratios seen over 2016–2023. See Figure 24.

Figure 24. Median NERA-Defined Investor Losses and Median Ratio of Settlement to Investor Losses by Settlement Year
January 2016–December 2025



NERA has identified the following key factors as driving settlement amounts:

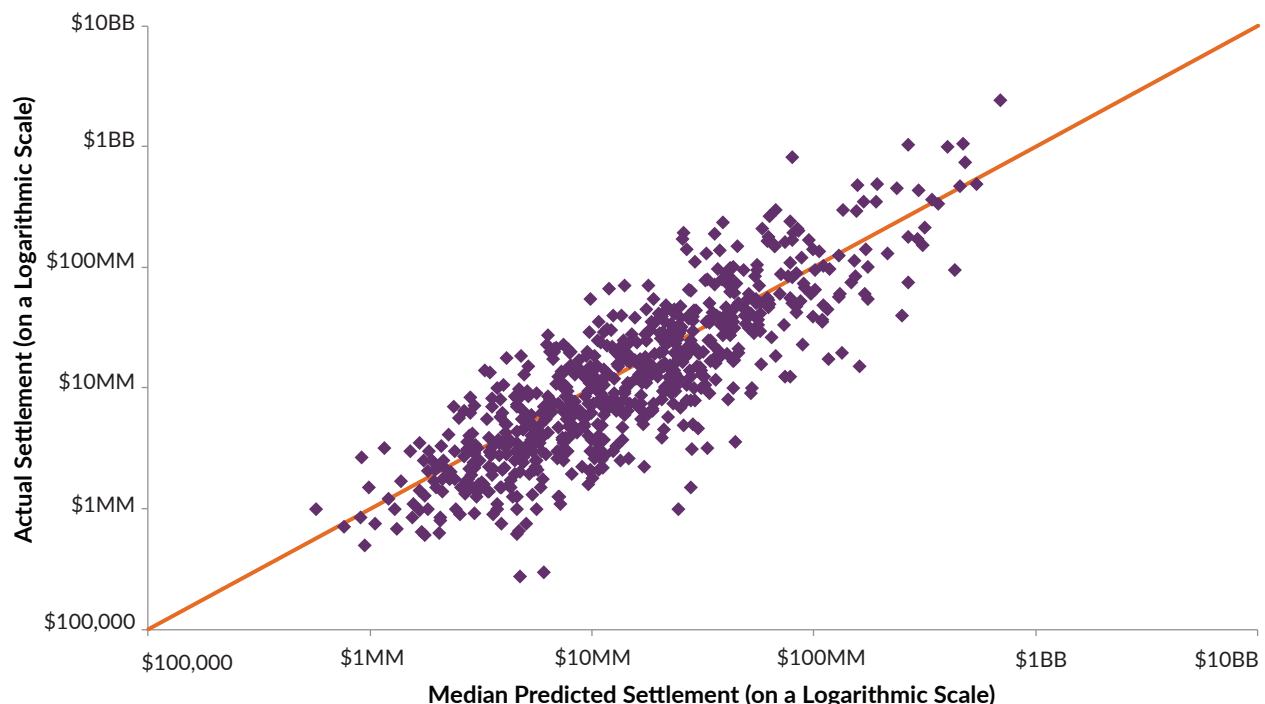
- NERA-Defined Investor Losses;
- The market capitalization of the issuer immediately after the end of the class period;
- The types of securities (in addition to common stock) alleged to have been affected by the fraud;
- Variables that serve as a proxy for the merit of plaintiffs' allegations (e.g., whether the company has already been sanctioned by a government or regulatory agency or paid a fine in connection with the allegations);
- The stage of litigation at the time of settlement; and
- Whether an institution or public pension fund is named lead plaintiff (see Figure 25).

Among cases settled between January 2012 and December 2025, these factors in NERA's statistical model can explain more than 70% of the variation observed in actual settlements. Because this is an observational study, the statistical analysis does not mean that a particular factor caused a change in the settlement value (e.g., institutional investors may target cases with certain characteristics), but the analysis does allow one to statistically predict settlement sizes as well as to determine, *ex post*, whether a settlement was statistically unusually large or small after controlling for these variables.

Figure 25. **Predicted vs. Actual Settlements**

Investor Losses Using S&P 500 Index

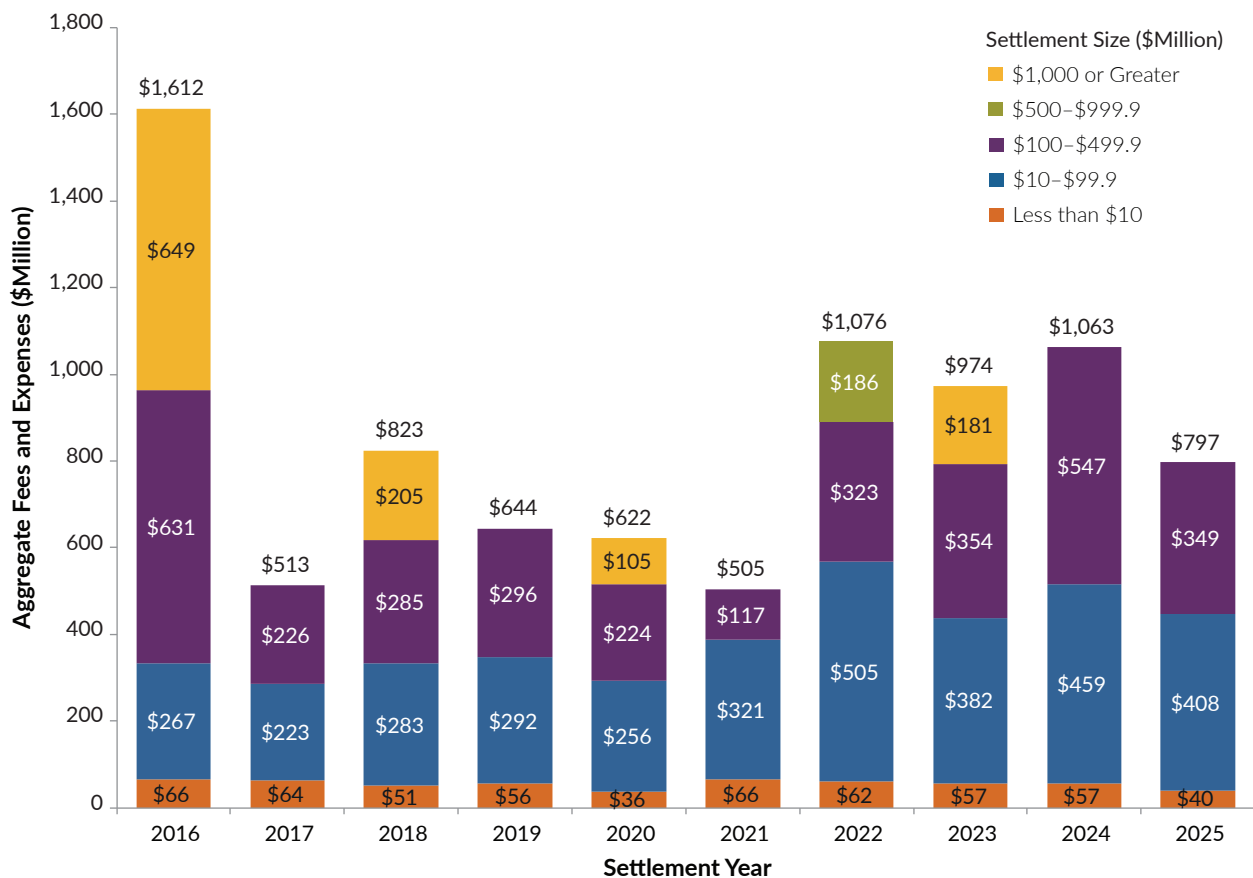
Cases Settled January 2012–December 2025



TRENDS IN PLAINTIFFS' ATTORNEYS' FEES AND EXPENSES

Since 2016, annual aggregate plaintiffs' attorneys' fees and expenses have ranged from a low of \$505 million to a high of \$1.6 billion. In 2025, aggregate plaintiffs' attorneys' fees and expenses totaled \$797 million, a 25% decline from the \$1.063 billion in 2024. Plaintiff's attorneys' fees and expenses comprised roughly 27.1% of the \$2.9 billion aggregate settlement amount in 2025. See Figure 26.

Figure 26. **Aggregate Plaintiffs' Attorneys' Fees and Expenses by Settlement Size**
January 2016–December 2025

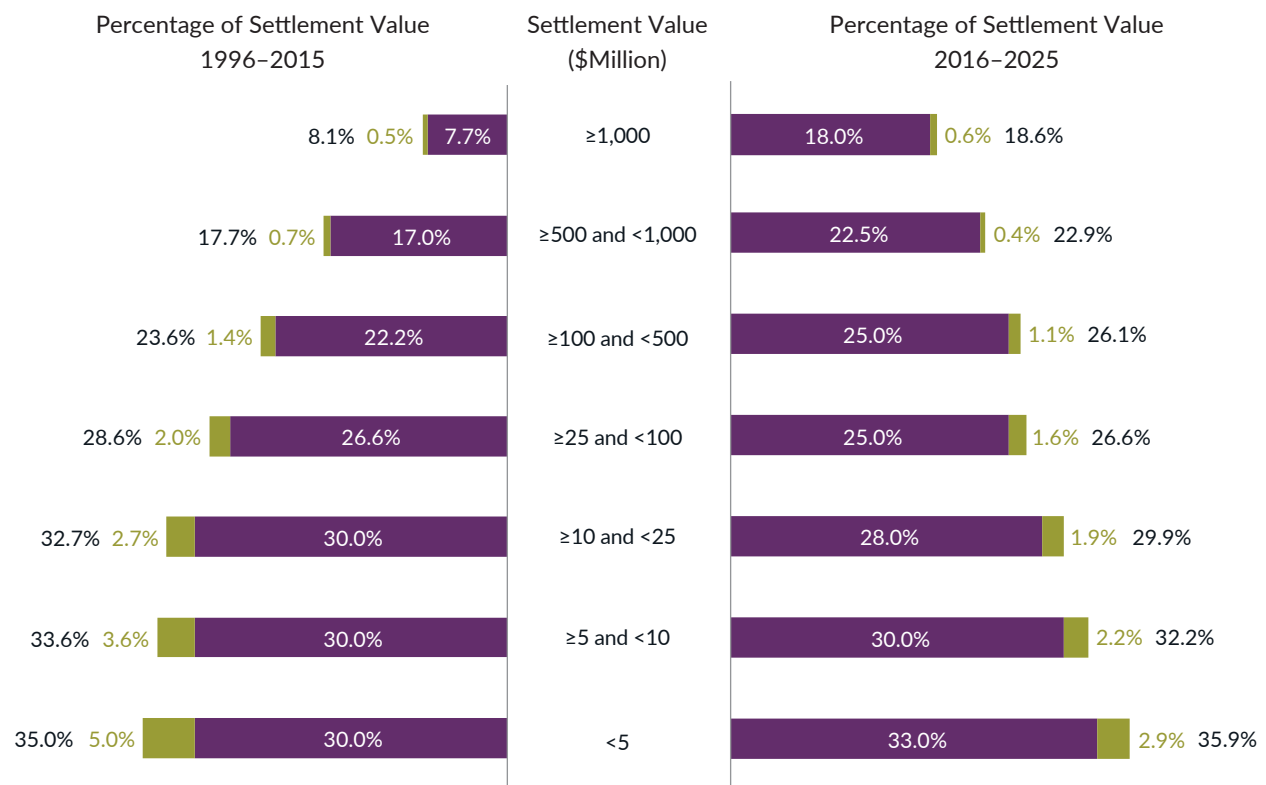


A historical analysis of plaintiffs' attorneys' fees and expenses for cases that have settled following the passage of the Private Securities Litigation Reform Act (PSLRA) in 1995 shows that fees and expenses as a percentage of the settlement amount generally decline as the settlement size increases. For instance, for cases settled between 2016 and 2025, the median share that plaintiffs' attorneys' fees and expenses represent relative to the total settlement ranged from 35.9% in settlements of \$5 million or lower to 18.6% in settlements of \$1 billion or higher.

For cases that have settled in the last 10 years, the median percentage of attorneys' fees has increased for settlements under \$5 million and settlements over \$100 million, while they have slightly declined for settlements between \$10 million and \$100 million, relative to settlements in the 1996–2015 period. This increase is more pronounced for settlements of \$500 million or higher, although this is partly attributed to the low number of such settlements (six) in the 2016–2025 period. See Figure 27.

Figure 27. **Median of Plaintiffs' Attorneys' Fees and Expenses by Size of Settlement**

Excludes Merger Objections, Crypto Unregistered Securities, and Settlements for \$0 to the Class



Note: Component values may not add to total value due to rounding.

■ Median Fees ■ Median Expenses

CONCLUSION

The number of federal securities class action suits filed fell by 11%, from 232 in 2024 to 207 in 2025. Approximately 92% of the drop in filings can be explained by a reduction in the number of standard cases alleging violations of Rule 10b-5, Section 11, and/or Section 12, which also declined by 11% from 214 in 2024 to 191 in 2025. Similarly, nearly half of the drop in standard filings can be attributed to a decrease in the number of standard cases filed against foreign companies, a category that saw only 25 suits in 2025, the lowest number in the last 10 years.

Among non-merger objection, non-crypto unregistered securities cases filed in 2025, the healthcare technology and services sector contributed the largest share of filings across all economic sectors with 31%, and courts in the Second Circuit saw the most filings of all federal circuits with 62. Suits with AI- and crypto-related claims accounted for roughly 15% of all new filings in 2025.

For the first time since 2022, there were more securities class action resolutions than filings, which resulted in a reduction in the number of pending cases. There were 234 resolved cases in 2025, an 11% increase relative to 2024 and which consisted of 155 dismissals and 79 settlements. For dismissed cases, the median time to dismissal declined from 1.9 years in 2024 to 1.6 years in 2025, while for settled cases, the median time to settlement slightly increased from 3.2 years in 2024 to 3.3 years in 2025.

The 79 settlements in 2025 totaled \$3.9 billion, with the top 10 settlements accounting for 59% of this amount. Compared to last year, the average settlement value declined by \$4 million to \$40 million, while the median settlement value increased by approximately \$3 million to \$17 million. For cases settled over the 2016–2025 period, the median plaintiffs' attorneys' fees as a percentage of settlement value ranged from 18.0% for settlements of at least \$1 billion to 33.0% for settlements of \$5 million or less.

NOTES

- 1 This edition of NERA's report on "Recent Trends in Securities Class Action Litigation" expands on previous work by our colleagues Lucy P. Allen, Dr. Vinita Juneja, Dr. Denise Neumann Martin, Dr. Jordan Milev, Robert Patton, Dr. Stephanie Planchich, Janeen McIntosh, and others. The authors thank Dr. David Tabak and Benjamin Seggerson for helpful comments on this edition. We thank Daniel Klotz, Debra Lederman, Nicholas Kwasnik, and other researchers from NERA's securities and finance capability for their valuable assistance. These individuals receive credit for improving this report; any errors and omissions are those of the authors. NERA's proprietary securities class action database and all analyses reflected in this report are limited to US federal case filings and resolutions.
- 2 NERA tracks securities class actions that have been filed in US federal courts. Most of these cases allege violations of federal securities laws; others allege violations of common law, including breach of fiduciary duty, as with some merger-objection cases; still others are filed in federal court under foreign or state law. If multiple actions are filed against the same defendant, are related to the same allegations, and are in the same circuit, we treat them as a single filing. The first two actions filed in different circuits are treated as separate filings. If cases filed in different circuits are consolidated, we revise our count to reflect the consolidation. Therefore, case counts for a particular year may change over time. Different assumptions for consolidating filings would probably lead to counts that are similar but may, in certain circumstances, lead observers to draw a different conclusion about short-term trends in filings. Data for this report were collected from multiple sources, including Institutional Shareholder Services Securities Class Action Services (ISS SCAS), Dow Jones Factiva, Bloomberg Finance, FactSet Research Systems, Nasdaq, Intercontinental Exchange, US Securities and Exchange Commission (SEC) filings, complaints, case dockets, and public press reports. All rights in the information provided by ISS SCAS and its affiliates (ISS SCAS) reside with ISS SCAS and/or its licensors. ISS SCAS makes no express or implied warranties of any kind and shall have no liability for any errors, omissions, or interruptions in or in connection with any data provided by ISS SCAS. IPO laddering cases are presented only in Figure 1.
- 3 IPO figures taken from Stock Analysis, accessed 9 January 2026, available at <https://stockanalysis.com/ipos/statistics/>.
- 4 Federal securities class actions that allege violations of Rule 10b-5, Section 11, and/or Section 12 have historically dominated federal securities class action dockets and have often been referred to as "standard" cases. In the analyses of this report, standard cases involve registered securities and do not include cases involving crypto unregistered securities, which are considered a separate category.
- 5 IPO figures taken from Stock Analysis, accessed 9 January 2026, available at <https://stockanalysis.com/ipos/statistics/>.
- 6 In this study, crypto cases consist of two mutually exclusive subgroups: (1) crypto shareholder class actions, which include a class of investors in common stock, American depositary receipts/ American depositary shares (ADR/ADS), and/or other registered securities, along with crypto- or digital-currency-related allegations; and (2) crypto unregistered securities class actions, which do not have class investors in any registered securities that are traded on major exchanges (New York Stock Exchange, Nasdaq). We include crypto shareholder class actions in all our analyses that include standard cases. Crypto unregistered securities class actions are excluded from some analyses, which is noted in the titles of our figures.
- 7 Most securities class action complaints include multiple allegations. For this analysis, all allegations from the complaint are included and thus the total number of allegations exceeds the total number of filings.
- 8 Here, a company is considered a foreign company based on the location of its principal executive office.
- 9 Talya Minsberg, "A Timeline of Trump's On-Again, Off-Again Tariffs," *The New York Times*, updated 14 October 2025, available at <https://www.nytimes.com/2025/03/13/business/economy/trump-tariff-timeline.html>.
- 10 "US Tariffs: What's the Impact on Global Trade and the Economy?" *J.P.Morgan*, 5 December 2025, available at <https://www.jpmorgan.com/insights/global-research/current-events/us-tariffs>.
- 11 Sydney Price, "Dow Faces Investor Suit Over Tariff-Related Disclosures," *Law360.com*, 2 September 2025, available at <https://www.law360.com/articles/2382774>.
- 12 Gillian R. Brassil, "Tronox Investor Sues After Record Stock Drop on Sales Setback," *BloombergLaw*, 4 September 2025, available at <https://news.bloomberglaw.com/class-action/tronox-investor-sues-after-record-stock-drop-on-sales-setback>.
- 13 Gina Kim, "CarMax's Hype Over Sales Ignored Tariff Fears, Investors Say," *Law360.com*, 3 November 2025, available at <https://www.law360.com/articles/2407028>.
- 14 Kevin M. LaCroix, "Geopolitical Developments, Visa Policies, and D&O Risk," *D&O Diary*, 27 July 2025, available at <https://www.dandodiary.com/2025/07/articles/securities-litigation/geopolitical-developments-visa-policies-and-do-risk/>.
- 15 Rick Archer, "Cantor Fitzgerald Exec Named In Virtual Currency Ponzi Suit," *Law360.com*, 16 June 2016, available at <https://www.law360.com/articles/807687>.
- 16 See Edward Flores and Jordan Milev, "AI and Securities Class Action Litigation," *NERA*, 17 December 2025, available at <https://www.nera.com/insights/publications/2025/economic-perspectives-on-ai/ai-and-securities-class-action-litigation.html>.

NOTES

- 17 See Edward Flores and Svetlana Sarykh, "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 Sarykh, "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 Sarykh, "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 10D

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Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re ALPHABET, INC. SECURITIES
LITIGATION

) Master File No. 3:18-cv-06245-TLT

) CLASS ACTION

This Document Relates To:

ALL ACTIONS.

) DECLARATION OF MICHAEL ALBERT
) FILED ON BEHALF OF ROBBINS GELLER
) RUDMAN & DOWD LLP IN SUPPORT OF
) APPLICATION FOR AWARD OF
) ATTORNEYS' FEES AND EXPENSES

DATE: September 24, 2024

TIME: 2:00 p.m.

CTRM: 9, 19th Floor

JUDGE: Honorable Trina L. Thompson

1 I, MICHAEL ALBERT, declare as follows:

2 1. I am a member of the firm of Robbins Geller Rudman & Dowd LLP (“Robbins
3 Geller” or the “Firm”). I am submitting this declaration in support of the application for an award
4 of attorneys’ fees, expenses, and charges (together, “expenses”) in connection with services
5 rendered in the above-entitled action (the “Litigation”).

6 2. This Firm is Lead Counsel of record for lead plaintiff State of Rhode Island, Office
7 of the Rhode Island Treasurer on behalf of the Employees’ Retirement System of Rhode Island
8 and the Settlement Class herein.

9 3. The information in this declaration regarding the Firm’s time and expenses is taken
10 from time and expense reports and supporting documentation prepared and/or maintained by the
11 Firm in the ordinary course of business. I am a partner who oversaw and/or conducted the day-to-
12 day activities in the Litigation and I reviewed these reports (and back-up documentation where
13 necessary or appropriate) in connection with the preparation of this declaration. The purpose of
14 this review was to confirm both the accuracy of the entries as well as the necessity for, and
15 reasonableness of, the time and expenses committed to the Litigation. As a result of this review,
16 reductions were made to both time and expenses in the exercise of billing judgment. Based on this
17 review and the adjustments made, I believe that the time reflected in the Firm’s lodestar calculation
18 and the expenses for which payment is sought herein are reasonable and were necessary for the
19 effective and efficient prosecution and resolution of the Litigation.

20 4. After the reductions referred to above, the number of hours spent on the Litigation
21 by the Firm is 23,026.30. A breakdown of the lodestar is provided in the attached Exhibit A. The
22 lodestar amount for attorney/paraprofessional time based on the Firm’s current rates is
23 \$14,514,240.00. The hourly rates shown in Exhibit A are the Firm’s current rates in contingent
24 cases set by the Firm for each individual. These hourly rates are consistent with hourly rates
25 submitted by the Firm to state and federal courts in other securities class action litigation. The
26
27
28

1 Firm's rates are set based on periodic analysis of rates charged by firms performing comparable
2 work both on the plaintiff and defense side. Different timekeepers within the same employment
3 category (*e.g.*, partners, associates, paralegals, etc.) may have different rates based on a variety of
4 factors, including years of practice, years at the Firm, years in the current position (*e.g.*, years as a
5 partner), relevant experience, relative expertise, and the rates of similarly experienced peers at this
6 Firm or other firms. For personnel who are no longer employed by the Firm, the "current rate"
7 used for the lodestar calculation is based upon the rate for that person in his or her final year of
8 employment with the Firm.

10 5. Attached as Exhibit B is a chart reflecting the time billed by each timekeeper in
11 each of 20 categories, and also reflects each timekeeper's individual hours and lodestar at their
12 current rate.

14 6. The Firm seeks an award of \$1,540,059.57 in expenses and charges in connection
15 with the prosecution of the Litigation. Those expenses and charges are summarized by category
16 in the attached Exhibit C.

17 7. The following is additional information regarding certain of these expenses:

18 (a) Filing and Attorney Service Fees: \$4,700.55. These expenses have been
19 paid to the Court for filing fees and to attorney service firms or individuals who either: (i) served
20 process of the complaint or subpoenas; or (ii) obtained copies of court documents for Lead
21 Plaintiff. The vendors who were paid for these services are set forth in the attached Exhibit D.

23 (b) Transportation, Hotels, and Meals: \$4,466.55. In connection with the
24 prosecution of this case, the Firm has paid for travel expenses to attend a court hearing and a
25 deposition. The date, destination, and purpose of each trip is set forth in the attached Exhibit E.

26 (c) Court Hearing Transcripts, Deposition Transcripts, and Videography:
27 \$18,510.15. The vendors who were paid for these services are listed in the attached Exhibit F.
28

1 (d) Experts and Consultants: \$1,335,158.93.

2 (i) F. Partnoy, Inc.: \$433,125.00. Frank Partnoy is the Adrian A.
3 Kragen Professor of Law at the UC Berkeley School of Law and he has written extensively on the
4 fields of securities markets and regulation, including finance, accounting, and valuation. Lead
5 Counsel utilized Professor Partnoy's opinions on market efficiency and the ability to prove class-
6 wide damages in connection with Lead Plaintiff's second motion to certify class.
7

8 (ii) The BVA Group, LLC: \$412,119.61. BVA is a nationally
9 recognized consulting group which specializes in valuation, financial advisory, and commercial
10 litigation. Joseph R. Mason, Ph.D. is a Professor of Finance at the Ourso School of Business,
11 Louisiana State University, Fellow at the Wharton School, the University of Pennsylvania, and
12 Senior Advisor at BVA Group. Lead Counsel retained Dr. Mason to analyze and provide expert
13 opinion regarding whether damages could be shown at a class-wide basis in connection with Lead
14 Plaintiff's first motion to certify class.
15

16 (iii) Jonah Gelbach: \$362,094.51. Jonah Gelbach, Ph.D., J.D. is an
17 economist and the Herman F. Selvin Professor of Law at the University of California Berkeley
18 School of Law where his scholarship focuses on, among other topics, law and economics, event
19 study methodology, securities litigation, and applied statistical methodology. Lead Counsel
20 retained Professor Gelbach to research, analyze, and provide expert opinions on issues relating to
21 price impact and statistical significance of the alleged stock drops in connection with Lead
22 Plaintiff's second motion to certify class. Lead Counsel also extensively consulted Professor
23 Gelbach on the issues of loss causation and damages. In addition, Professor Gelbach played a vital
24 role in the development and negotiation of the Plan of Allocation, which governs how claims will
25 be calculated.
26
27
28

(iv) Andrew Baker: \$59,678.67. Andrew Baker is an assistant Professor of Law at the University of California Berkeley School of Law. Lead Counsel retained Professor Baker to assist in Professor Gelbach's research and analyses.

(v) Kellogg, Hansen, Todd, Figel & Frederick, PLLC: \$58,131.46. Kellogg, Hansen, Todd, Figel & Frederick, PLLC is a preeminent trial and appellate litigation firm. Lead Counsel retained Kellogg Hansen to advise and assist with the preparation of Supreme Court briefs in connection with Defendants' Petition for a Writ of Certiorari.

(vi) ValueEdge Advisors, LLC: \$6,379.68. ValueEdge Advisors is a leading corporate governance consulting firm. Lead Counsel retained ValueEdge Advisors to analyze and provide advice related to corporate governance policies and potential reforms at Alphabet.

(vii) Tasta Group (d/b/a Caliber Advisors, Inc.): \$2,612.50. Lead Counsel retained the services of economic expert Bjorn Steinholt with Caliber Advisors, Inc. to analyze and provide his opinions regarding the statistical significance of alleged stock drops as well as estimated damages.

(viii) HaystackID, LLC: \$1,017.50. HaystackID is a specialized e-discovery services firm. Lead Counsel retained the services of HaystackID to assist with issues related to Alphabet's production of electronic documents, including document attachments, hyperlinks, and format of productions.

(e) Online Legal and Financial Research: \$33,876.73. This category includes vendors such as the Federal Trade Commission, LexisNexis Products, PACER, Refinitiv, Thomson Financial, and Westlaw. These resources were used to obtain access to SEC filings, factual databases, legal research, and for proofreading and "blue-booking" court filings (including checking all legal authorities cited and quoted in briefs). This category represents the expenses

1 incurred by Robbins Geller for use of these services in connection with this Litigation. The charges
2 for these vendors vary depending upon the type of services requested. For example, Robbins
3 Geller has flat-rate contracts with some of these providers for use of their services. When Robbins
4 Geller utilizes online services provided by a vendor with a flat-rate contract, access to the service
5 is by a billing code entered for the specific case being litigated. At the end of each billing period
6 in which such service is used, Robbins Geller's costs for such services are allocated to specific
7 cases based on the percentage of use in connection with that specific case in the billing period. As
8 a result of the contracts negotiated by Robbins Geller with certain providers, the Class enjoys
9 substantial savings in comparison with the "market-rate" for *a la carte* use of such services which
10 some law firms pass on to their clients. For example, the "market-rate" charged to others by
11 LexisNexis for the types of services used by Robbins Geller is more expensive than the rates
12 negotiated by Robbins Geller.

13
14
15 (f) eDiscovery Database Hosting: \$16,166.80. Robbins Geller has installed top
16 tier database software, infrastructure, and security. The platform implemented, Relativity, is
17 offered by over 100 vendors and is currently being used by 198 of the AmLaw200 firms. Over 50
18 servers are dedicated to Robbins Geller's Relativity hosting environment with all data stored in a
19 secure SSAE 18 Tier III data center with automatic replication to a datacenter located in a different
20 geographic location. By hosting in-house, Robbins Geller is able to charge a reduced, all-in rate
21 that includes many services which are often charged as extra fees when hosted by a third-party
22 vendor. Robbins Geller's hosting fee includes user logins, ingestion, processing, OCRing,
23 TIFFing, bates stamping, productions, and archiving – all at no additional per unit cost. Also
24 included is unlimited structured and conceptual analytics (*i.e.*, email threading, inclusive detection,
25 near-dupe detection, concept searching, active learning, clustering, and more). Robbins Geller is
26 able to provide all these services for a cost that is typically much lower than outsourcing to a third-
27
28

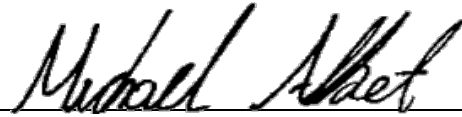
1 party vendor. Utilizing a secure, advanced platform in-house has allowed Robbins Geller to
2 prosecute actions more efficiently, utilize advanced AI technology, and has reduced the expense
3 associated with maintaining and searching electronic discovery databases. Similar to third-party
4 vendors, Robbins Geller uses a tiered rate system to calculate hosting charges. The amount
5 requested reflects charges for the hosting of over a half million pages of documents received from
6 parties and non-parties in this action.

7
8 (g) Mediation Fees (Phillips ADR Enterprises, P.C.): \$126,351.88. The
9 Honorable Layn R. Phillips (Ret.) is a former United States District Judge and United States
10 Attorney, and is a highly respected mediator with extensive experience in complex securities
11 litigation. Judge Phillips facilitated the settlement negotiations over the course of many
12 discussions, written submissions, a full-day in-person mediation session, and subsequent
13 negotiations, ultimately leading to the settlement of this Litigation.

14
15 8. The expenses pertaining to this case are reflected in the books and records of this
16 Firm. These books and records are prepared from receipts, expense vouchers, check records, and
17 other documents and are an accurate record of the expenses.

18 9. The identification and background of my Firm and its partners is attached hereto as
19 Exhibit G.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th
21 day of July, 2024, at San Diego, California.

22
23 

24 MICHAEL ALBERT

EXHIBIT A

EXHIBIT A

In re Alphabet, Inc. Securities Litigation, No. 3:18-cv-06245-TLT
Robbins Geller Rudman & Dowd LLP
Inception through June 24, 2024

| NAME | | HOURS | RATE | LODESTAR |
|----------------------------|------|--------------|-------------|-----------------|
| Albert, Michael | (P) | 1,045.40 | 785 | \$ 820,639.00 |
| Bays, Lea M. | (P) | 68.90 | 915 | 63,043.50 |
| Daley, Joseph D. | (P) | 26.20 | 1050 | 27,510.00 |
| Forge, Jason A. | (P) | 1,572.00 | 1200 | 1,886,400.00 |
| Gusikoff Stewart, Ellen A. | (P) | 105.20 | 1200 | 126,240.00 |
| Janoski Gray, J. Marco | (P) | 812.10 | 760 | 617,196.00 |
| Liu, Ting H. | (P) | 609.30 | 760 | 463,068.00 |
| Myers, Danielle S. | (P) | 12.00 | 1075 | 12,900.00 |
| Robbins, Darren J. | (P) | 52.80 | 1400 | 73,920.00 |
| Williams, Shawn A. | (P) | 10.80 | 1200 | 12,960.00 |
| Abel, Lawrence A. | (A) | 1,907.90 | 700 | 1,335,530.00 |
| Brane, Austin P. | (A) | 35.60 | 550 | 19,580.00 |
| Dolitsky, Kenneth P. | (A) | 304.20 | 400 | 121,680.00 |
| Fallon, Sarah A. | (A) | 833.30 | 400 | 333,320.00 |
| Lakosil, Natalie F. | (A) | 10.30 | 450 | 4,635.00 |
| Oetting, Justin G. | (A) | 37.50 | 375 | 14,062.50 |
| Robertson, Jessica E. | (A) | 14.90 | 375 | 5,587.50 |
| Andracchio, Laura M. | (OC) | 938.20 | 1130 | 1,060,166.00 |
| Bowens, M. Lamontt | (OC) | 556.00 | 480 | 266,880.00 |
| Prado, Svenna | (OC) | 2,066.50 | 915 | 1,890,847.50 |
| Walton, David C. | (OC) | 4.20 | 1135 | 4,767.00 |
| Cho, Grace | (SA) | 1,373.80 | 460 | 631,948.00 |
| Fiore, Andrea G. | (SA) | 1,884.70 | 460 | 866,962.00 |
| Gao, Mary N. | (SA) | 596.00 | 460 | 274,160.00 |
| Greenberg, Brett B. | (SA) | 1,642.20 | 440 | 722,568.00 |
| Hierholzer, Jesse J. | (SA) | 8.00 | 460 | 3,680.00 |
| Hinton, David B. | (SA) | 31.90 | 475 | 15,152.50 |
| Montalvo, Sabrina | (SA) | 645.20 | 475 | 306,470.00 |
| Petix, Andrew T. | (SA) | 267.10 | 450 | 120,195.00 |
| Ronan, Charles R. | (SA) | 1,645.30 | 450 | 740,385.00 |
| Sarpy, Steven C. | (SA) | 292.40 | 450 | 131,580.00 |
| Selden, Jill B. | (SA) | 505.00 | 475 | 239,875.00 |
| Sonney, Megan M. | (SA) | 769.30 | 450 | 346,185.00 |
| Sousa, Elena | (SA) | 893.00 | 450 | 401,850.00 |
| Williams, Tavish M. | (SA) | 341.90 | 450 | 153,855.00 |
| Forensic Accountant | | 6.50 | 775 | 5,037.50 |
| Economic Analysts | | 108.35 | 315-470 | 44,052.50 |
| Research Analysts | | 49.20 | 325 | 15,990.00 |

| <i>NAME</i> | | <i>HOURS</i> | <i>RATE</i> | <i>LODESTAR</i> |
|-----------------------|--|------------------|-------------|-------------------------|
| Investigator | | 12.50 | 350 | 4,375.00 |
| Litigation Support | | 123.80 | 245-415 | 39,167.00 |
| Law Clerks | | 33.00 | 175-185 | 5,935.00 |
| Summer Associate | | 14.10 | 170 | 2,397.00 |
| Paralegals | | 662.65 | 350-410 | 268,292.50 |
| Document Clerks | | 50.30 | 160 | 8,048.00 |
| Shareholder Relations | | 46.80 | 110-150 | 5,148.00 |
| <i>TOTAL</i> | | 23,026.30 | | \$ 14,514,240.00 |

(P) Partner

(A) Associate

(OC) Of Counsel

(SA) Staff Attorney

Exhibit 10E

KIRBY AISNER & CURLEY LLP
Proposed Attorneys for the Debtor
700 Post Road, Suite 237
Scarsdale, New York 10583
Tel: (914) 401-9500
Dawn Kirby, Esq.
dkirby@kacllp.com
Dana Brescia, Esq.
dbrescia@kacllp.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In re:

FIRSTBASE.IO, INC.

Chapter 11
Case No. 24-11647 (LGB)

Debtor.

-----X

**DEBTOR’S APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING
RETENTION AND EMPLOYMENT OF QUINN EMANUEL URQUHART &
SULLIVAN, LLP AND DILWORTH PAXSON LLP, AS SPECIAL LITIGATION
COUNSEL PURSUANT TO BANKRUPTCY CODE SECTIONS 327(e), 328(a), AND
1107(b), NUNC PRO TUNC TO THE PETITION DATE**

The above-captioned debtor and debtor in possession (the “Debtor”) respectfully states as follows in support of this application (this “Application”):

Relief Requested

1. The Debtor seeks entry of the orders (the “Orders”), substantially in the form attached hereto as **Exhibit A**: (a) approving the employment and retention of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”) and Dilworth Paxson LLP (“Dilworth”) as special litigation counsel in connection with the action titled Harbor Business Compliance Corporation v. Firstbase.io, Inc., pending in the United States District Court for the Eastern District of Pennsylvania (the “District Court”), Index No. 5:23-cv-00802 (the “Harbor Business Compliance Action”), including any appeals thereof, and (b) granting related relief. In support of this Application, the Debtor relies upon and incorporates by reference the declaration of Derek Shaffer, a partner of Quinn Emanuel (the

“Shaffer Declaration”), attached hereto as **Exhibit B**, and the declaration of David Rodkey, an associate of Dilworth (the “Rodkey Declaration”), attached hereto as **Exhibit C**.

Jurisdiction and Venue

2. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated January 31, 2012. The Debtor confirms its consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), to the entry of a final order by the Court in connection with this Application to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

3. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are Bankruptcy Code sections 327(e), 328(a), and 1107(b), Bankruptcy Rules 2014(a) and 2016(a), and Rules 2014-1 and 2016-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York (the “Local Bankruptcy Rules”).

Background

5. Firstbase.io, Inc. (“Firstbase” or the “Debtor”) is a technology company which provides business formation services to the public.

6. Firstbase is a foreign business corporation formed under the laws of the State of Delaware on January 25, 2021, and authorized to do business in the State of New York as of March 18, 2021. Firstbase operates out of leased premises located at 26 Mercer, 3rd Floor, New York, New York 10013.

7. On May 28, 2022, the Debtor and Harbor Business Compliance Corporation (“Harbor Business”) signed an agreement under which Harbor Business would provide certain business

services (the “Partnership Agreement”). During the course of this partnership several disputes emerged between the Debtor and Harbor Business, including but not limited to, the alleged misuse of information and resources that Harbor Business regarded as its trade secrets, and the validity of certain invoices issued by Harbor Business under the Partnership Agreement.

8. On March 1, 2023, Harbor Business filed the Harbor Business Compliance Action against the Debtor in the District Court in connection with the disputes and asserted claims against the Debtor for breach of contract, breach of the implied duty of good faith and fair dealing, trade secret misappropriation under the Pennsylvania Uniform Trade Secrets Act and Federal Defend Trade Secrets Act, unfair competition, and unjust enrichment.

9. On or about April 4, 2023, Firstbase retained Dilworth to represent it in the Harbor Business Compliance Action. On or about April 24, 2023, Dilworth appeared on behalf of Debtor in the Harbor Business Compliance Action and has continued to represent the Debtor therein, until the commencement of the within bankruptcy case. Firstbase asserted counterclaims against Harbor Business for breach of contract and fraudulent inducement to contract.

10. On or about May 13, 2024, Firstbase also retained Quinn Emanuel to represent it in the Harbor Business Compliance Action. On May 28, 2024, Quinn Emanuel appeared on behalf of Debtor in the Harbor Business Compliance Action and has continued to represent the Debtor therein, until the commencement of the within bankruptcy case.

11. Following discovery and Firstbase’s unsuccessful motion for partial summary judgment, the Court presided over a two-week jury trial from April 8 to April 19, 2024. At the conclusion of the trial, the jury found Firstbase liable for breach of contract, trade secret misappropriation, and unfair competition. The jury awarded Harbor Business \$1,090,271 for the breach-of-contract claim, \$11,068,044 for the trade secret claims, and \$14,757,399 in compensatory

damages as well as an additional \$1,000,000 in punitive damages for the unfair competition claim (the “**Foreign Judgment**”). Notably, the compensatory damages awarded on the trade secret and unfair competition counts overlap: both derived from the same analysis by the same damages expert who Harbor Business offered to calculate the amount of Firstbase’s profits allegedly subject to disgorgement.

12. On May 17, 2024, both parties submitted post-trial motions as set forth in further detail below (the “**Post-Trial Motions**”).

13. *First*, Firstbase moved for judgment as a matter of law, seeking to vacate the judgment as to trade secret misappropriation and unfair competition pursuant to Federal Rule of Civil Procedure 50(b). In the alternative, Firstbase seeks a new trial or reduced judgment pursuant to Federal Rule of Civil Procedure 59. Firstbase principally contends that Harbor Business’s alleged trade secrets were never identified with requisite specificity; that any such trade secrets were already known to Firstbase and the general public; that there is no evidence Firstbase used any alleged trade secrets; and that Firstbase was prejudiced by a new analysis conducted by one of Harbor Business’s expert witnesses at trial. Firstbase also contends that the jury erroneously awarded duplicative damages for the trade secret and unfair competition claims, requiring a reduction of at least \$11,000,000 in damages. Harbor Business opposed Firstbase’s post-trial motion, and it remains pending.

14. *Second*, Firstbase filed a motion to stay the execution of the judgment pending resolution of its post-trial motion and appeal, arguing that Firstbase would otherwise be forced into bankruptcy before final judgment could be rendered in light of the important post-trial submissions that remain pending. The Court denied that motion on August 22, 2024.

15. *Third*, Harbor Business filed an omnibus motion seeking to incorporate the following into the final judgment: (i) the statutory maximum exemplary damages (*i.e.*, twice the amount of

compensatory damages) in connection with its trade secret misappropriation claims; (ii) a permanent injunction against Firstbase’s continued use of the alleged trade secrets beginning on March 28, 2027; (iii) Harbor Business’s attorneys’ fees, costs, and expenses; and (iv) pre- and post-judgment interest. In support of each, Harbor Business argues that Firstbase’s conduct was willful and malicious. Firstbase opposed Harbor Business’s post-trial motion, and it remains pending.

16. On August 13, 2024, Harbor Business filed a lawsuit against the Debtor in the Supreme Court of the State of New York, County of New York, Index No. 157580/2024, for the purpose of domesticating the Foreign Judgment as a judgment in New York. On August 19, 2024, the Foreign Judgment was entered in the New York County Clerk’s Office (the “New York Judgment”).

17. Since entry of the New York Judgment, Harbor Business has sought enforcement of the New York Judgment against the assets of the Debtor, including scheduling an auction of certain property (which was scheduled to take place on September 26, 2024 by the NYC Marshal) and restraining virtually all of the Debtor’s financial and processing accounts, forcing the Debtor to seek protection under the provisions of the Bankruptcy Code.

18. On September 25, 2024 (the “Petition Date,”), Firstbase filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, staying all litigation involving Firstbase, including the issuance of a decision by the District Court on the Post-Trial Motions pending in the Harbor Business Compliance Action.

19. Firstbase intends to petition the bankruptcy court, or enter into a Stipulation with Harbor Business, to lift the automatic stay imposed herein as it relates to the Harbor Business Compliance Action, so as to allow for the resolution of the pending Post-Trial Motions, and an appeal, if necessary, as such resolution will have a material impact on the within proceedings.

20. Firstbase expects the Court to resolve the two outstanding Post-Trial Motions and, in accordance with that ruling, either enter final judgment or order a new trial. At that point, either or both parties may appeal the Foreign Judgment in whole or in part to the United States Court of Appeals for the Third Circuit. Should the Court deny Firstbase's post-trial motion and/or grant Harbor Compliance's post-trial motion, Firstbase expects to appeal promptly and to argue vigorously for reversal on both liability and damages, consistent with settled precedent.

21. As it is essential that the Debtor has qualified representation in the Harbor Business Compliance Action as it moves forward through Post-Trial Motions, and likely the appeals process, the Debtor seeks approval of the employment and retention of Quinn Emanuel and Dilworth for that purpose.

Quinn Emanuel and Dilworth's Qualifications

22. The Debtor seeks to retain Quinn Emanuel and Dilworth in connection with the Harbor Business Compliance Action, including any appeals thereof, because of the firms' expertise in commercial litigation, as well as their extensive knowledge of the facts and familiarity with the issues presented in the Harbor Business Compliance Action.

23. Quinn Emanuel specializes in complex litigation, with more than 1,000 attorneys in offices handling nearly every facet of litigation – from jury trials and arbitrations to Supreme Court arguments. Quinn Emanuel routinely represents debtors' estates as special litigation counsel, including recent engagements such as *In re FTX Trading Ltd.*, Case No. 22-11068 (Bankr. D.Del.); *In re Lucky Bucks Holdings LLC*, Case No. 23-10756 (Bankr. D. Del.); and *In re Talen Energy Supply LLC*, Case No. 22-90054 (Bankr. S.D. Tex).

24. Dilworth is a full-service law firm that has been in existence for more than ninety (90) years. Dilworth specializes in, among other things, commercial and intellectual property litigation.

25. The Debtor believes that Quinn Emanuel's and Dilworth's qualifications, knowledge of the Debtor's business and familiarity with the Harbor Business Compliance Action, will enable the firms to work in an efficient and cost-effective manner on behalf of the Debtor and that Quinn Emanuel and Dilworth are well-qualified to serve as special litigation counsel with respect to the Harbor Business Compliance Action.

26. Accordingly, their retention as special litigation counsel should be approved.

27. By separate application, the Debtor will move for an order authorizing the retention and employment of Kirby Aisner & Curley LLP as general bankruptcy counsel.

28. These professionals work and will continue to work under the direction of the Debtor, who is committed to minimizing duplication of services to reduce professional costs.

Services to be Provided

29. Quinn Emanuel and Dilworth will maintain the same roles and division of services, under their retention herein, as they have pre-petition, with Dilworth handling all trial matters, including but not limited to providing extensive factual knowledge of the trial record and issues that have been raised through the course of the litigation, and Quinn Emanuel taking the lead on the briefing and argument on appeal. At times, and only if necessary, each firm may assist the other in the preparation and presentation of certain issues, but such efforts are not redundant or duplicative of each other. Additionally, Quinn Emanuel and/or Dilworth will appear before this Court in the event it is necessary to provide this court with a detailed update as to the status of the Harbor Business Compliance Action.

No Duplication of Services

30. The Debtor believes that the services provided by Quinn Emanuel and Dilworth will not duplicate each other and will not duplicate the services that other professionals will be providing

to the Debtor in this chapter 11 case. The Debtor will coordinate with Quinn Emanuel, Dilworth and the Debtor's other professionals to minimize unnecessary duplication of efforts among the Debtor's professionals. Quinn Emanuel and Dilworth will not act as the Debtor's general bankruptcy counsel in this chapter 11 case.

Professional Compensation

31. Subject to this Court's approval and in accordance with sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, the Local Rules and other procedures that may be fixed by the Court, the Debtor requests that Quinn Emanuel and Dilworth be compensated on an hourly basis and that Quinn Emanuel and Dilworth receive reimbursement of actual and necessary expenses incurred in connection with its representation of the Debtor in this case. Further, Quinn Emanuel and Dilworth intend to apply for compensation for professional services rendered in connection with this chapter 11 case, subject to this Court's approval and in compliance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, the Local Bankruptcy Rules and any other applicable orders issued by this Court, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by Quinn Emanuel and Dilworth in connection with this case.

32. Quinn Emanuel informed the Debtor that, subject to this Court's approval, it will continue to bill Debtor through September 2025 at the following hourly rates: \$1,645.00-\$2,410.00 for partners; \$940.00-\$2,410.00 for associates, counsel, and other attorneys; and \$595.00-\$645.00 for law clerks and legal assistants.

33. Dilworth informed the Debtor that, subject to this Court's approval, it will bill at its standard hourly rates, which currently are as high as: \$1,100 for partners; \$460 for associates, counsel, and other attorneys; and \$325 for law clerks and paralegals. David Rodkey will be the primary attorney on this matter, and he currently bills at \$460 per hour.

34. The Debtor believes these rates are consistent with market rates for comparable services and have been informed that Quinn Emanuel and Dilworth set its hourly rates on an annual basis. These hourly rates are subject to periodic adjustments (typically on September 1st of each year and January 1st, respectively) to reflect economic and other conditions. Quinn Emanuel and Dilworth will provide ten (10) business days' notice of any rate increases to the Debtor, the U.S. Trustee, and the Official Committee of Unsecured Creditors, if one is appointed.

35. Quinn Emanuel and Dilworth will maintain detailed records of actual and necessary costs and expenses incurred in connection with the legal services it provides to the Debtor. The Debtor understands that Quinn Emanuel and Dilworth are customarily reimbursed for all expenses incurred in connection with the representation of a client in a given matter, including, but not limited to, photocopying services, printing, delivery charges, filing fees, postage, travel costs, "working" meals, and computer research. Quinn Emanuel's and Dilworth's expenses may also include the fees and expenses of experts retained in connection with the Harbor Business Compliance Action, and any appeal thereof.

36. During the 90-day period prior to the Petition Date, the Debtor paid Dilworth the sum of \$60,000 (\$30,000.00 paid on July 2, 2024 and \$30,000 paid on August 2, 2024). On May 15, 2024, the Debtor paid Quinn Emanuel a retainer in the amount of \$100,000.00 and on July 2, 2024, Quinn Emanuel was paid a second retainer also in the amount of \$100,000.00. The total amount of the retainers received by Quinn Emanuel from May 15, 2024, through September 24, 2024, was \$200,000.00.

37. Quinn Emanuel asserts that as of the Petition Date it is owed the sum of \$218,136.90. Dilworth asserts that as of the Petition Date it is owed the sum of \$1,036,942.73. Debtor reserves its

right to challenge said amounts after further investigation and review of the amounts alleged to be due and owing.

No Adverse Interest

38. To the best of the Debtor's knowledge, as described in the Shaffer and Rodkey Declarations, Quinn Emanuel and Dilworth do not represent or hold any interest adverse to the Debtor or its estate with respect to matters on which Quinn Emanuel and Dilworth are to be retained.

39. Quinn Emanuel and Dilworth will periodically review its files during the pendency of this chapter 11 case to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, Quinn Emanuel and Dilworth will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

Basis for Relief

40. Retention pursuant to Bankruptcy Code section 327(e) is appropriate given the specific scope of the proposed retention and Quinn Emanuel's and Dilworth's prepetition representation. Section 327(e) provides that, subject to court approval, a debtor:

may employ, for a specified special purpose, other than to represent the trustee in conducting the case, an attorney that has represented the debtor, if in the best interest of the estate, and if such attorney does not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed.

11 U.S.C § 327(e).

41. Moreover, Bankruptcy Code section 1107(b) provides that a person is not disqualified for employment under section 327 by a debtor in possession solely because of such person's employment by or representation of the debtor before the commencement of the case. 11 U.S.C. § 1107(b).

42. Retention of an attorney under section 327(e) does not require the same searching inquiry required for a debtor to retain general bankruptcy counsel under section 327(a). *See Meespierson Inc. v. Strategic Telecom Inc.*, 202 B.R. 845, 847 (D. Del. 1996) (“[S]pecial counsel employed under [section] 327(e) need only avoid possessing a conflict of interest concerning the matter at hand.”). Nevertheless, the phrase “does not represent or hold any interest adverse to the debtor or to the estate” requires a determination of “all relevant facts surrounding the debtors’ case, including, but not limited to, the nature of the debtor’s business, all foreseeable employment of special counsel, [and] the expense of replacement counsel” *In re Woodworkers Warehouse, Inc.*, 323 B.R. 403, 406 (D. Del. 2005). In general, however, subject to the requirements of sections 327 and 1107, a debtor in possession is entitled to the counsel of its choosing. *In re Vouzianas*, 259 F.3d 103, 108 (2d Cir. 2001) (observing that “[o]nly in the rarest cases should the trustee be deprived of the privilege of selecting his own counsel”).

A. Quinn Emanuel’s and Dilworth’s Retention Is Necessary and Is in the Best Interests of the Debtor’s Estate.

43. The Debtor believes that it is in the best interests of the Debtor’s estate to retain Quinn Emanuel and Dilworth as special counsel, in light of their qualifications, their experience in commercial litigation generally, and their prepetition role in the Harbor Business Compliance Action. Indeed, if the Debtor is required to retain different counsel to replace Quinn Emanuel and Dilworth in connection with the Harbor Business Compliance Action, the Debtor will need to find, educate, and integrate new counsel in these matters, and expend significant resources in doing so, rather than devoting its time and focus to its reorganization efforts and the Harbor Business Compliance Action. In this respect, retaining Quinn Emanuel and Dilworth will avoid unnecessary administrative expenses and delays, result in cost efficiencies, and provide valuable assistance to the Debtor’s efforts to reorganize.

B. Quinn Emanuel and Dilworth Neither Holds Nor Represents any Interest Adverse to the Debtor.

44. Except as set forth herein and in the Shaffer and Rodkey Declarations, partners, counsel, and associates of Quinn Emanuel and Dilworth, to the best of the Debtor's knowledge, information, and belief, do not represent, and do not hold, any interest adverse to the Debtor or its estate, its creditors, or equity security holders, their respective attorneys and accountants, the U.S. Trustee, any person employed by the Office of the U.S. Trustee, or any other party in interest in this chapter 11 case in the matters for which Quinn Emanuel and Dilworth are to be retained.

45. Moreover, the lawyers and staff expected to provide services to the Debtor on behalf of Quinn Emanuel and Dilworth are not related to the U.S. Trustee assigned to this case, any person employed in the Office of the U.S. Trustee, or the Bankruptcy Judge presiding over this case.

46. The Shaffer and Rodkey Declarations also demonstrate that although Quinn Emanuel and Dilworth represent and have represented several of the Debtor's creditors and affiliates of the Debtor's creditors, those matters are not substantially related to the Debtor's bankruptcy case; the representation is of an affiliate; the representation has concluded; and/or the representations and the claims of those creditors are immaterial and *de minimus*.

No Prior Request

47. No prior application for the relief sought herein has been made to this or any other court.

Conclusion

WHEREFORE, for the reasons set forth herein, in the Shaffer and Rodkey Declarations, the Debtor respectfully requests that the Court enter the Orders, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: October 21, 2024
New York, New York

FIRSTBASE.IO, INC.

By: /s/ Mark Milastsivy
Mark Milastsivy, CEO

Exhibit 10F

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Apple Tree Life Sciences, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-12177 (LSS)

(Jointly Administered)

Objection Deadline: June 5, 2026 at 4:00 p.m. (ET)
Hearing Date: July 22, 2026 at 10:00 a.m. (ET)

**SUMMARY OF FIRST INTERIM APPLICATION OF
QUINN EMANUEL URQUHART & SULLIVAN, LLP FOR
COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT
OF EXPENSES AS CO-COUNSEL TO THE DEBTORS AND DEBTORS IN
POSSESSION FOR THE PERIOD DECEMBER 9, 2025, THROUGH MARCH 31, 2026²**

Name of Applicant: Quinn Emanuel Urquhart & Sullivan, LLP

Authorized to Provide Professional Services to: Debtors and Debtors in Possession

Date of Retention: May 5, 2026, effective as of
December 9, 2025

Period for which compensation
and reimbursement are sought: December 9, 2025 through March 31, 2026

Amount of Compensation sought as actual,
reasonable, and necessary: \$5,480,528.18

Amount of Expense Reimbursement sought
as actual, reasonable, and necessary: \$116,938.28

This is a(n): ____ monthly X interim ____ final application

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: Apple Tree Life Sciences, Inc. (4506); ATP Life Science Ventures, L.P. (8224); ATP III GP, Ltd. (6091); Apertor Pharmaceuticals, Inc. (3161); Initial Therapeutics, Inc. (2453); Marlinspike Therapeutics, Inc. (4757); Red Queen Therapeutics, Inc. (8563); Evercrisp Biosciences, Inc. (4437); Nine Square Therapeutics, Inc. (4503); and Nereid Therapeutics Incorporated (8493). The location of the Debtors' service address in these chapter 11 cases is 230 Park Avenue, Suite 2800, New York, NY 10169.

² Quinn Emanuel has agreed to discount the fees in this case by 10%. Each monthly invoice reflects the 10% discount, as does this Summary, except for the fees listed in the chart named Compensation by Professional. 100% of Quinn Emanuel's fees total \$6,146,997. 90% of Quinn Emanuel's fees total \$5,480,528.18 (after subtracting 50% of non-working travel).



2512177260522000000000002

Summary of Monthly Fee Applications for Interim Period:

| | | Requested | | Approved / Pending Approval | | Requested Holdback Fees (20%) |
|----------------|-------------------|----------------|--------------|-----------------------------|-----------------|-------------------------------|
| Date Filed | Period | Fees | Expenses | Fees (80%) | Expenses (100%) | |
| 05/15/26 | 12/09/25-03/31/26 | \$5,480,528.18 | \$116,938.28 | \$4,384,422.54 | \$116,938.28 | \$1,096,105.64 |
| Docket No. 682 | | | | | | |
| TOTALS: | | \$5,480,528.18 | \$116,938.28 | \$4,384,422.54 | \$116,938.28 | \$1,096,105.64 |

Summary of Any Objections to Monthly Fee Applications: None.

PLEASE TAKE NOTICE that, Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel” or the “Applicant”), co-counsel to the debtors and debtors in possession (collectively, the “Debtors”), has today filed the *First Interim Application of Quinn Emanuel Urquhart & Sullivan, LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Debtors and Debtors in Possession for the Period December 9, 2025, Through March 31, 2026* (the “Interim Application”) pursuant to the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 181] (the “Administrative Order”).

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, are required to be filed on or before **June 5, 2026 at 4:00 p.m. (ET)** (the “Objection Deadline”) with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, must be served upon and received by the following Application Recipients: (i) co-counsel to the Debtors, (a) Quinn Emanuel Urquhart & Sullivan, LLP, 295 5th Avenue, 9th Floor, New York, New York 10016 (Attn: Andrew M. Berdon (andrewberdon@quinnemanuel.com) and Patricia B. Tomasco (pattytomasco@quinnemanuel.com)) and Quinn Emanuel Urquhart & Sullivan, LLP, 865 S. Figueroa Street, 10th Floor, Los Angeles, California 90017 (Attn: Eric D. Winston (ericwinston@quinnemanuel.com)); (b) Potter Anderson & Corroon LLP, 1313 N. Market Street, 6th Floor, Wilmington, Delaware 19801-6108 (Attn: L. Katherine Good (kgood@potteranderson.com) and Brett M. Haywood (bhaywood@potteranderson.com)); and (c) Murphy & King, P.C., 28 State Street, Suite 3101, Boston, Massachusetts 02109 (Attn: Harold B. Murphy (hbmurphy@murphyking.com) and Andrew G. Lizotte (alizotte@murphyking.com)) (ii) the U.S. Trustee, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801 (Attn: Hannah McCollum (hannah.mccollum@usdoj.gov) and Megan Seliber (megan.seliber@usdoj.gov)); and (iii) counsel to the Committee, Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, Delaware 19801 (Attn: Justin R. Alberto (jalberto@coleschotz.com) and Patrick J. Reilley (preilley@coleschotz.com)).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Application will be held before The Honorable Laurie Selber Silverstein at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 on **July 22, 2026 at 10:00 a.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, (i) attached hereto as **Exhibit A** is a summary of compensation by each professional of the Applicant that worked on the above-captioned chapter 11 cases, (ii) attached hereto as **Exhibit B** is a summary of compensation by

project category, (iii) attached hereto as **Exhibit C** is an expense summary, (iv) attached hereto as **Exhibit D** are the Applicant's customary and comparable compensation disclosures, (v) attached hereto as **Exhibit E** are certain additional disclosure related to the Interim Application, and (vi) attached hereto as **Exhibit F** is a certification, where an attorney of the Applicant certifies to certain matters addressed in the Administrative Order.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

[Remainder of Page Intentionally Left Blank]

Dated: May 22, 2026
Wilmington, Delaware

Respectfully submitted,

/s/ Patricia B. Tomasco

Patricia B. Tomasco, Esq. (admitted *pro hac vice*)

Andrew M. Berdon, Esq. (*pro hac vice* pending)

Rachel E. Epstein, Esq. (admitted *pro hac vice*)

Alain Jaquet, Esq. (admitted *pro hac vice*)

Rachel Harrington, Esq. (admitted *pro hac vice*)

QUINN EMANUEL URQUHART

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rachelharrington@quinnemanuel.com

-and-

Eric D. Winston, Esq. (admitted *pro hac vice*)

Razmig Izakelian, Esq. (admitted *pro hac vice*)

Benjamin Roth, Esq. (admitted *pro hac vice*)

QUINN EMANUEL URQUHART

& SULLIVAN, LLP

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Los Angeles, California 90017

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razmigizakelian@quinnemanuel.com

benroth@quinnemanuel.com

Counsel to the Debtors and Debtors in Possession

**EXHIBIT A - COMPENSATION BY INDIVIDUAL
DECEMBER 9, 2025 THROUGH MARCH 31, 2026¹**

| Name of Professional Individual | Position | Year of Admission/Years of Experience | Hourly Billing Rate | Total Hours Billed | Total Compensation |
|--|-----------------|--|----------------------------|---------------------------|---------------------------|
| Andrew M. Berdon | Partner | 1988; 38 years | \$1,900.00 | 30.00 | \$57,000.00 |
| Andrew M. Berdon | Partner | 1988; 38 years | \$2,130.00 | 74.90 | \$159,537.00 |
| Michael Barlow | Partner | 2000; 26 years | \$1900.00 | 2.60 | \$4,940.00 |
| Michael Barlow | Partner | 2000; 26 years | \$2,130.00 | 85.70 | \$182,541.00 |
| Eric D. Winston | Partner | 1999; 27 years | \$1,765.00 | 75.10 | \$132,551.50 |
| Eric D. Winston | Partner | 1999; 27 years | \$2,085.00 | 306.80 | \$639,678.00 |
| Patty Tomasco | Partner | 1988; 38 years | \$1,715.00 | 104.60 | \$179,389.00 |
| Patty Tomasco | Partner | 1988; 38 years | \$2,010.00 | 410.70 | \$825,507.00 |
| Joseph Paunovich | Partner | 2003; 23 years | \$2,010.00 | 1.10 | \$2,211.00 |
| William Adams | Partner | 2006; 20 years | \$2,010.00 | 25.30 | \$50,853.00 |
| Rachel Epstein | Partner | 2010; 16 years | \$1,545.00 | 58.10 | \$89,764.50 |
| Rachel Epstein | Partner | 2010; 16 years | \$1,925.00 | 104.80 | \$201,740.00 |
| James Bieber | Partner | 2014; 12 years | \$1,825.00 | 49.70 | \$90,702.50 |
| Eric M. Kay | Counsel | 1996; 30 years | \$1,765.00 | 79.50 | \$140,317.50 |
| Alexee Deep Conroy | Counsel | 2007; 19 years | \$1,670.00 | 14.30 | \$23,881.00 |
| Daniel Holzman | Counsel | 1999; 27 years | \$1,670.00 | 3.90 | \$6,513.00 |

¹ Travel billed at 100%.

| Name of Professional Individual | Position | Year of Admission/Years of Experience | Hourly Billing Rate | Total Hours Billed | Total Compensation |
|--|-----------------|--|----------------------------|---------------------------|---------------------------|
| Lisa Geary | Counsel | 2015; 11 years | \$1,670.00 | 17.90 | \$29,893.00 |
| Wesley Hartman | Counsel | 2018; 8 years | \$1,670.00 | 75.50 | \$126,085.00 |
| Alain Jaquet | Associate | 2016; 10 years | \$1,380.00 | 84.80 | \$117,024 |
| Alain Jaquet | Associate | 2016; 10 years | \$1,495.00 | 508.20 | \$759,759.000 |
| Andrew Shifren | Associate | 2023; 3 years | \$1,330.00 | 32.40 | \$43,092.00 |
| Ben Roth | Associate | 2019; 7 years | \$1,380.00 | 78.90 | \$108,882.00 |
| Ben Roth | Associate | 2019; 7 years | \$1,495.00 | 27.70 | \$41,411.50 |
| Brendan Ferguson | Associate | 2024; 2 years | \$1,200.00 | 3.30 | \$3,960.00 |
| Camilo Rivera | Associate | 2025; 1 year | \$1,055.00 | 10.90 | \$11,499.50 |
| Daniel Albert-Rozenberg | Associate | 2024; 2 years | \$1,055.00 | 2.60 | \$2,743.00 |
| Jenna Stevens | Associate | 2024; 2 years | \$1,055.00 | 1.70 | \$1,793.50 |
| Jenny Braun | Associate | 2019; 7 years | \$1,380.00 | 0.70 | \$966.00 |
| Jessica Reese | Associate | 2019; 7 years | \$1,380.00 | 4.00 | \$5,520.00 |
| Jessica Reese | Associate | 2019; 7 years | \$1,495.00 | 20.20 | \$30,199.00 |
| John Ferraro | Associate | 2022; 4 years | \$1,330.00 | 45.50 | \$60,515.00 |
| Jonathan Acevedo | Associate | 2021; 5 years | \$1,335.00 | 4.30 | \$5,740.50 |
| Jonathan Acevedo | Associate | 2021; 5 years | \$1,440.00 | 28.00 | \$40,320.00 |
| Jordan Blocher | Associate | 2024; 2 years | \$1,055.00 | 23.70 | \$25,003.50 |

| Name of Professional Individual | Position | Year of Admission/Years of Experience | Hourly Billing Rate | Total Hours Billed | Total Compensation |
|--|-----------------|--|----------------------------|---------------------------|---------------------------|
| Rachel Harrington | Associate | 2024; 2 years | \$1,120.00 | 85.20 | \$95,424.00 |
| Rachel Harrington | Associate | 2024; 2 years | \$1,200.00 | 294.60 | \$353,520.00 |
| Razmig Izakelian | Associate | 2013; 13 years | \$1,425.00 | 34.10 | \$48,592.50 |
| Razmig Izakelian | Associate | 2013; 13 years | \$1,555.00 | 404.50 | \$628,997.50 |
| Shannon Doughty | Associate | 2020; 6 years | \$1,335.00 | 3.30 | \$4,405.50 |
| Shannon Doughty | Associate | 2020; 6 years | \$1,440.00 | 9.40 | \$13,536.00 |
| Soojin Park | Associate | 2025; 1 year | \$1,055.00 | 7.40 | \$7,807.00 |
| Taylor Jones | Associate | 2015; 11 years | \$1,555.00 | 30.30 | \$47,116.50 |
| Alcides Mulgrave | Attorney | 2005; 21 years | \$600.00 | 24.00 | \$14,400.00 |
| Carole Cleaver | Attorney | 1986; 40 years | \$600.00 | 43.00 | \$25,800.00 |
| David Draisin | Attorney | 2008; 18 years | \$600.00 | 44.00 | \$26,400.00 |
| Eric Ladson | Attorney | 2001; 25 years | \$600.00 | 56.50 | \$33,900.00 |
| Erick Ladson | Attorney | 2001; 25 years | \$600.00 | 23.00 | \$13,800.00 |
| Erin Burke | Attorney | | \$600.00 | 66.00 | \$39,600.00 |
| Jason Chow | Attorney | 2003; 23 years | \$1,035.00 | 45.00 | \$46,575.00 |
| Jerry Chow | Attorney | 2006; 20 years | \$1,035.00 | 47.40 | \$49,059.00 |
| Joseph Bowley | Attorney | 2005; 21 years | \$600.00 | 32.50 | \$19,500.00 |
| Justin Rosenberg | Attorney | 2008; 18 years | \$1,035.00 | 37.60 | \$38,916.00 |

| Name of Professional Individual | Position | Year of Admission/Years of Experience | Hourly Billing Rate | Total Hours Billed | Total Compensation |
|--|----------------------|--|----------------------------|---------------------------|---------------------------|
| Mark Gordon | Attorney | 1992; 34 years | \$1,035.00 | 20.00 | \$20,700.00 |
| Olubayo Evans | Attorney | 2007; 19 years | \$600.00 | 48.50 | \$29,100.00 |
| Rick Bhasin | Attorney | 2006; 20 years | \$1,035.00 | 49.00 | \$50,715.00 |
| Roi Vadai | Attorney | 2006; 20 years | \$600.00 | 17.70 | \$10,620.00 |
| Stephen Chiu | Attorney | 2006; 20 years | \$1,035.00 | 64.70 | \$66,964.50 |
| Timothy Coleman | Attorney | 1992;34 years | \$600.00 | 52.50 | \$31,500.00 |
| Vladimir Bass | Attorney | 2005; 21 years | \$600.00 | 19.70 | \$11,820.00 |
| Brian Fallas | Law Clerk | N/A | \$610.00 | 1.50 | \$915.00 |
| Brian Fallas | Law Clerk | N/A | \$685.00 | 96.30 | \$65,965.50 |
| Emily Moore | Law Clerk | N/A | \$610.00 | 5.50 | \$3,355.00 |
| Emily Moore | Law Clerk | N/A | \$685.00 | 79.70 | \$54,594.50 |
| Barbara J. Howell | Paralegal | N/A | \$510.00 | 27.00 | \$13,770.00 |
| Barbara J. Howell | Paralegal | N/A | \$570.00 | 62.60 | \$35,682.00 |
| Lauren E Miller | Paralegal | N/A | \$570.00 | 4.00 | \$2,280.00 |
| Sheri Sweigart | Paralegal | N/A | \$510.00 | 8.00 | \$4,080.00 |
| Sheri Sweigart | Paralegal | N/A | \$570.00 | 5.40 | \$3,078.00 |
| Dave Scholz | Graphics Coordinator | N/A | \$570.00 | 0.60 | \$342.00 |
| Ho Man Chan | Litigation Support | N/A | \$210.00 | 151.30 | \$31,773.00 |

| Name of Professional Individual | Position | Year of Admission/Years of Experience | Hourly Billing Rate | Total Hours Billed | Total Compensation |
|--|--------------------|--|----------------------------|---------------------------|---------------------------|
| Linda Yanez | Litigation Support | N/A | \$210.00 | 4.10 | \$861.00 |
| TOTAL | | | | 4,403.30 | \$6,146,997.00 |
| ATTORNEY COMPENSATION | | | | | \$6,055,131.00 |
| TOTAL ATTORNEY HOURS | | | | | 4,140.30 |
| BLENDED ATTORNEY RATE | | | | | \$1,462.48 |

Exhibit 10G

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

Saga Formations, Inc.,¹

Debtors.

Chapter 11

Case No. 24-11161 (BLS)

**Hearing Date: May 21, 2026, at 11:30 a.m.
(Eastern)**

**Objection Deadline: May 7, 2026, at 4:00
p.m. (Eastern)**

**SIXTH AND FINAL FEE APPLICATION OF
QUINN EMANUEL URQUHART & SULLIVAN, LLP**

| | |
|---|--|
| Name of Applicant: | Quinn Emanuel Urquhart & Sullivan, LLP |
| Authorized to Provide Professional Services to: | Claudia Z. Springer, Esq. as Chapter 11 Trustee |
| Date of Retention: | October 28, 2024, <i>nunc pro tunc</i> to September 23, 2024 |
| Application Period for which Compensation and Reimbursement are sought: | December 1, 2025, through March 31, 2026 |
| Compensation sought as actual, reasonable, and necessary during the Application Period: | \$2,181.15 |
| Expenses sought as actual, reasonable, and necessary during the Application Period: | \$0.00 |
| Final Application Period for which Compensation and Reimbursement of Expenses are sought: | September 23, 2024, through March 31, 2026 |
| Compensation sought as actual, reasonable, and necessary during the Final Application Period: | \$150,703.65 |
| Expenses sought as actual, reasonable, and necessary during the Final Application Period: | \$82.09 |

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. (9113); Pajeau, Inc. (8758); and Tangible Play, Inc. (9331).



This is a final application

If this is not the first application filed, disclose the following for each prior application:

| DATE FILED | PERIOD COVERED | REQUESTED
FEES/EXPENSES | APPROVED
FEES/EXPENSES |
|---|---|----------------------------|---------------------------|
| January 17, 2025
(Docket Nos. 457/466) | September 23, 2024,
through November 30, 2024 | \$51,620.40/\$82.09 | \$51,620.00/\$82.09 |
| April 1, 2025 (Docket
Nos. 605/608) | December 1, 2024,
through February 28,
2025 | \$44,950.50/\$0.00 | \$44,950.50/\$0.00 |
| June 23, 2025
(Docket Nos. 791/793) | March 1, 2025,
through May 31,
2025 | \$5,965.20/\$0.00 | \$5,965.20/\$0.00 |
| September 30, 2025
(Docket No. 959) | June 1, 2025, through
August 31, 2025 | \$36,820.35/\$0.00 | \$36,820.35/\$0.00 |
| December 19, 2025
(Docket No. 1066) | September 1, 2025,
through November 30, 2025 | \$9,166.05/\$0.00 | \$9,166.05/\$0.00 |

COMPENSATION BY PROFESSIONAL DURING THE APPLICATION PERIOD

Saga Formations, Inc.
Case No. 24-11161 (BLS)
December 1, 2025, through March 31, 2026

| Name of Professional | Position | Hourly Billing Rate | Total Hours Billed | Total Compensation ² |
|----------------------|-----------|---------------------|--------------------|---------------------------------|
| Barbara J. Howell | Paralegal | \$655.00 | 3.7 | \$2,423.50 |
| Total | | | 3.7 | \$2,423.50 |

Blended Rate for the Application Period: \$589.50

COMPENSATION BY PROJECT CATEGORY DURING THE APPLICATION PERIOD

Saga Formations, Inc.
Case No. 24-11161 (BLS)
December 1, 2025, through March 31, 2026

| Category Description | Total Hours | Total Fees at 100% | Total Fees at 90% |
|------------------------------|-------------|--------------------|-------------------|
| 5-Fee/Employment Application | 3.7 | \$2,423.50 | \$2,181.15 |
| Total | 3.7 | \$2,423.50 | \$2,181.15 |

EXPENSES INCURRED DURING THE APPLICATION PERIOD

Saga Formations, Inc.
Case No. 24-11161 (BLS)
December 1, 2025, through March 31, 2026

| Expense | Amount |
|---------|--------|
| None | \$0.00 |

² Fees billed at 100%.

**COMPENSATION BY PROFESSIONAL DURING THE FINAL
APPLICATION PERIOD**

Saga Formations, Inc.
Case No. 24-11161 (BLS)
September 23, 2024, through March 31, 2026

| Professional | Title | Department | Date of First Admission | Fees Billed in the Final Application Period ³ | Hours Billed in the Final Application Period | Hourly Rate in the Final Application Period |
|----------------------|-----------|---------------------------------------|-------------------------|--|--|---|
| Dennis Hranizky | Partner | Bankruptcy & Restructuring | 1996 | \$23,963.00 | 11.2 | \$2,115.00 / \$2,390.00 |
| Nick Marsh | Partner | Civil Fraud Practice | 2001 | \$9,775.50 | 4.9 | \$1,995.00 |
| Joanna Stain | Partner | Civil Fraud Practice | 2006 | \$11,970.00 | 6.0 | \$1,995.00 |
| Benjamin Finestone | Partner | Bankruptcy & Restructuring | 2005 | \$26,426.00 | 14.6 | \$1,810.00 |
| Parnika Chaturvedi | Partner | International Arbitration | 2010 | \$1,991.00 | 1.1 | \$1,810.00 |
| Jagdish John Menezes | Counsel | International Arbitration | 2013 | \$690.00 | .4 | \$1,725.00 |
| Katherine Scherling | Counsel | Bankruptcy & Restructuring | 2010 | \$7,536.00 | 4.8 | \$1,570.00 |
| James Smithdale | Associate | Commercial Litigation and Arbitration | 2016 | \$46,926.00 | 29.7 | \$1,580.00 |
| Jianjian Ye | Associate | Bankruptcy & Restructuring | 2019 | \$4,981.00 | 3.4 | \$1,465.00 |
| Christine Botvinnik | Law Clerk | | | \$64.50 | .1 | \$645.00 |
| Barbara Howell | Paralegal | Bankruptcy & Restructuring | | \$33,125.50 | 54.1 | \$595.00 / \$655.00 |
| Total | | | | \$167,448.50 | 130.3 | |

Blended Rate (fees billed at 100%): \$1,285.10

Blended Rate (fees billed at 90%): 1,156.59

Blended Attorney Rate (fees billed at 90%): \$1,762.77

³ Fees billed at 100%.

COMPENSATION BY PROJECT CATEGORY DURING THE FINAL APPLICATION PERIOD

Saga Formations, Inc.
Case No. 24-11161 (BLS)
September 23, 2024, through March 31, 2026

| Category Description | Total Hours | Total Fees at 100% | Total Fees at 90% |
|--------------------------------|-------------|--------------------|-------------------|
| 01-Case Administration | 7.1 | \$7,557.50 | \$6,801.75 |
| 02-Asset Analysis/Recovery | 49.3 | \$86,639.50 | \$77,975.55 |
| 05-Fee/Employment Applications | 51.9 | \$35,756.50 | \$32,180.85 |
| 07-Avoidance Actions | .5 | \$785.00 | \$706.50 |
| 08-Hearing Attendance | 3.6 | \$6,274.50 | \$5,647.05 |
| 09-Adversary | 6.4 | \$10,652.50 | \$9,587.25 |
| 10-Other Contested Matters | 7.2 | \$13,032.00 | \$11,728.80 |
| 14-Plan | 4.3 | \$6,751.00 | \$6,075.90 |
| Total | 130.3 | \$167,448.50 | \$150,703.65 |

EXPENSES INCURRED DURING THE FINAL APPLICATION PERIOD

Saga Formations, Inc.
Case No. 24-11161 (BLS)
September 23, 2024, through March 31, 2026

| Expense | Amount |
|--|---------|
| Document Reproduction (Black & White at \$0.10 per page) | \$35.60 |
| Messenger | \$17.93 |
| Velobind | \$6.06 |
| Tabs | \$22.50 |
| Total | \$82.09 |

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

Quinn Emanuel's hourly rates for bankruptcy services are comparable to the hourly rates charged in complex chapter 11 cases by similarly skilled bankruptcy attorneys. In addition, Quinn Emanuel's hourly rates for bankruptcy services are comparable to the rates charged by the Firm for other complex corporate and litigation matters in the U.S. The rates charged by the Firm for the services performed in the prior calendar year in the practice areas that are comparable to the services performed by the Bankruptcy and Corporate Restructuring section are set forth below. Also included below is the 2025 blended hourly rate information for all sections of the Firm.

| Category of Timekeeper (using categories already maintained by the firm) | Blended Hourly Rate | |
|--|---|---|
| | Billed or Collected
Firm or offices (U.S.) for
preceding year excluding
bankruptcy | Billed
This Application
(incorporating the
10% discount) |
| Partner | \$1,831.35 | \$1,764.89 |
| Counsel | \$1,597.53 | \$1,423.73 |
| Associate/Contract
Attorneys/Law Clerks | \$1,313.50 | \$1,267.98 |
| Paraprofessional | \$597.03 | \$551.07 |
| All Timekeepers Aggregate | \$1,468.82 | \$1,156.59 |

BUDGET AND STAFFING PLAN
QUINN EMANUEL DOES NOT HAVE A STAFFING PLAN

A budget was not prepared in this case. Quinn Emanuel continues to work with the Trustee to ensure efficient and cost-effective service to the estates.

| BUDGET | | |
|----------------------------------|------------------------|-----------------------|
| Project Category | Estimated Hours | Estimated Fees |
| BY01-Case Administration | | |
| BY02-Asset Analysis and Recovery | | |
| BY05-Fee/Employment Application | | |
| BY07-Avoidance Action Analysis | | |
| BY08-Attend Court Hearings | | |
| BY09-Adversary Proceedings | | |
| BY10-Other Contested Matters | | |
| Total | 0.0 | 0.00 |

| STAFFING PLAN
QUINN EMANUEL DOES NOT HAVE A STAFFING PLAN | | |
|--|--|---------------------|
| Category of Timekeeper | Number of Timekeepers
Expected to Work on the
Matter During the Budgeted
Period | Average Rate |
| Partner | | |
| Counsel | | |
| Associate
(7 or more years since first admission) | | |
| Associate
(4-6 years since first admission) | | |
| Associate
(less than 4 years since first admission) | | |
| Paralegal | | |

| SUMMARY OF SIXTH AND FINAL APPLICATION | |
|--|--|
| Name of Applicant | Quinn Emanuel Urquhart & Sullivan, LLP |
| Name of Client | SAGA Formations, Inc., <i>et al.</i> |
| Time period covered by the Sixth and Final Application | December 1, 2025-March 31, 2026 |
| Total compensation sought during the Application Period | \$2,181.15 |
| Total expenses sought during the Application Period | \$0.00 |
| Petition Date (Involuntary) | June 4, 2024 |
| Retention Date (Date of Appointment of the Chapter 11 Trustee) | September 23, 2024 |
| Date of order approving employment | October 28, 2024 |
| Total compensation approved by interim order to date | \$148,522.50 |
| Total expenses approved by interim order to date | \$82.09 |
| Total allowed compensation paid to date (at the time of filing this Sixth and Final Application) | \$148,522.50 |
| Total allowed expenses paid to date (at the time of filing this Sixth and Final Application) | \$82.09 |
| Blended rate in the Sixth and Final Application for all attorneys (using 90% fees) (September 23, 2024, through March 31, 2026) | \$1,762.77 |
| Blended rate in the Sixth and Final Application for all timekeepers (using 90% fees) (September 23, 2024, through March 31, 2026) | \$1,156.59 |
| Compensation sought in the Sixth and Final Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed | \$0.00 |
| Expenses sought in the Sixth and Final Application already paid (or to be paid) pursuant to a monthly compensation order but not yet allowed | \$0.00 |
| Number of professionals included in the Sixth and Final Application (September 23, 2024, through March 31, 2026) | 9 |
| If applicable, number of professionals in the Sixth and Final Application not included in staffing plan approved by client | N/A |
| If applicable, difference between fees budgeted and compensation sought during the Application Period | N/A |
| Number of professionals billing fewer than 15 hours to the case during the Final Application Period | 10 |
| Are any rates higher than those approved or disclosed at retention? | No |

Exhibit 10H

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

HEALTH REPUBLIC INSURANCE
COMPANY,

Plaintiff,
on behalf of itself and all others
similarly situated,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:16-cv-259C-KCD
(Judge Davis)

COMMON GROUND HEALTHCARE
COOPERATIVE,

Plaintiff,
on behalf of itself and all others
similarly situated,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

No. 1:17-cv-00877-KCD
(Judge Davis)

DECLARATION OF ADAM B. WOLFSON

I, Adam B. Wolfson, declare:

1. I am a Partner in the San Francisco and Los Angeles offices of Quinn Emanuel Urquhart & Sullivan LLP, appointed class counsel in this matter. I make this declaration of my own personal knowledge and, if called to testify, I could and would competently testify hereto under oath.

2. Attached hereto as **Exhibit A** is a series of spreadsheets summarizing Class Counsel's lodestar on a per attorney and total basis through July 2020, the date of the original fee petition. As indicated by its title, the first spreadsheet reflects lodestar through July 2020 at Class

Counsel’s historical rates; *i.e.*, the hourly rates of its attorneys that were in place at the time they billed to the class actions. The second spreadsheet reflects Class Counsel’s lodestar if it used its then-current rates in July 2020, and the third spreadsheet reflects Class Counsel’s lodestar utilizing its current rates as of today. The final spreadsheet compares the different lodestar calculations and their implied lodestar multipliers.

3. I assembled the spreadsheets included in Exhibit A with the assistance of our accounting department. The historical rates set forth in the first spreadsheet are the rates my firm utilized for internal purposes throughout the life of the case. To update those rates to “current,” I first asked our accounting department to provide the hourly rates at which each attorney on the team billed out as of July 2020. For any associate who had left the firm by that point, we utilized the hourly rate at which the firm billed out attorneys of equivalent seniority, which is defined by the year they graduated from law school (and which is uniform across associates). For the 2023 rates, we applied the same methodology, with the exception that three partners (Stephen Swedlow, J.D. Horton, and Fred Bennett) were also no longer with the firm. For each, the accounting department provided the current hourly rates for the “band” of the partnership in which the firm billed each partner before their departure. This roughly corresponds to the partners’ years out of law school, but also their level of specialization.

4. The hourly rates included in each of the spreadsheets attached as part of Exhibit A are the actual hourly rates I and my colleagues quote to and charge paying clients. For the historical rates, those were hourly rates quoted to clients in the years in which the respective attorneys and other team members billed their time. Current rates are the hourly rates we quote to clients as of the date of this declaration.

5. As Exhibit A shows, a number of different Class Counsel attorneys worked on

these cases over the years. The following provides a summary of the key team members' and the overall team's work.

- The two highest billers in these cases were, respectively, J.D. Horton and Stephen Swedlow. Mr. Horton is a specialist in healthcare law and is the attorney who first identified the potential claims at issue here. He worked on the cases from their inception, including doing much of the initial work to assess the claims' potential viability. He then worked on readying the case for filing and, once we did file, continued to help develop the claims and legal arguments and defeat the government's attempts to escape liability. As the cases progressed, Mr. Horton was a constant team member whose records show he worked on every aspect of the cases. In that role, he worked closely with Mr. Swedlow, who was lead counsel in the cases until he departed Quinn Emanuel at the end of 2022 for public service as a judge in Illinois state court. Similar to Mr. Horton, Mr. Swedlow worked on these cases from the beginning and whose records show he was involved in nearly every aspect of the case. He, along with Mr. Horton, also took a central role in communicating and coordinating with the class members, and similarly coordinated with plaintiffs' counsel representing other risk corridor plaintiffs. Mr. Swedlow set forth his work in greater detail in his previous declarations from the original fee petition briefing. *See* Dkt. 84-1, 93-2.
- I am the next highest biller on these cases. Similar to Mr. Swedlow and Mr. Horton, I was on the case from its inception, although I joined shortly after they first identified the potential claims. Once I joined the case, I was centrally involved in further fleshing out the facts and legal theory, developing the complaint, identifying Health Republic as a potential class representative and discussing the potential lawsuit with its CEO and other officers, responding to the government's motion to dismiss, moving to certify the class, handling the opt-in process (including reaching out to potential class members and discussing the case with them), drafting and developing the class's motion for summary judgment, and drafting and working with co-counsel in each of the parallel appeals. I also regularly corresponded with class members and other interested parties in connection with the cases.
- Several other partners also provided their services in these cases over the years. These included Kathleen Sullivan, David Cooper, William Adams, Andy Schapiro, Eric Winston, Steven Edwards, and Fred Bennett. Ms. Sullivan, Mr. Cooper, and Mr. Adams are each appellate specialists and were critical in helping formulate, draft, and critique the various appellate-level briefs Class Counsel submitted in the parallel appeals. They also helped moot others who were preparing for oral argument on risk corridors-related issues. Mr. Schapiro, who is an appellate expert in his own right but also practices more regularly as a trial lawyer, assisted in

various aspects of the core litigation on both the appellate and everyday level. He has since stepped into a more central role helping lead the cases with me, including in the final subclass work for the risk corridors claims, as well as in the ongoing cost-sharing reduction claims. Finally, each of Mr. Winston, Mr. Edwards, and Mr. Bennett provided spot advice on various different issues that arose over the years. Mr. Winston is a bankruptcy specialist and helped think through potential issues that might arise from class members that went bankrupt or were otherwise put into insolvency proceedings due to, *inter alia*, the government's failure to pay full risk corridor amounts. (That exact scenario has since played out and is something we as Class Counsel have addressed for several subclass members.) Mr. Edwards and Mr. Bennett were each senior litigation partners with expertise in government-facing and other relevant types of litigation that they brought to bear to help think through and assist in directing the team to preemptively research/assess issues that might arise in these cases.

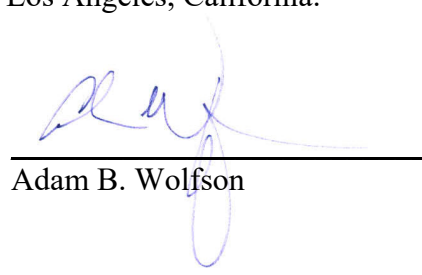
- Among the associate team, Arthur Roberts, Margaret Haas, and Hunter Thompson provided the bulk of associate-level services on the case through its early days. This included research, drafting, fact gathering, interacting with class members (a very time-intensive task, given the number of class members), interacting with other risk corridor plaintiffs and their counsel, and other necessary day-to-day tasks. In 2020, two more associates, Ben Berkman and Allison Huebert, provided additional core support for the team, working on similar types of tasks. And, as reflected in the lodestar charts included as Exhibit A, several other associates provided discrete help throughout the years for both cases.
- A number of paralegals also assisted with various tasks in the cases, although our primary paralegal throughout was Katherine Fuller.

6. Having been on these cases from the beginning, I can attest that the team's goal throughout was to provide the class with the greatest possible combination of efficiency and efficacy. Among other things, we regularly held team check-in calls, where the core partner team (Mr. Swedlow, Mr. Horton, and myself) would receive reports from the various team members about their work, and we would then discuss strategy and next steps. On these calls and in team emails, we provided clear divisions of labor and response deadlines, in order to minimize duplication of work while ensuring that no stone went unturned for the class. In terms of staffing on the case, the paramount concern was always how and whether a team member could add to

the collective effort. My understanding then, as well as my understanding now after reviewing our time records in this case, is that each team member that billed time provided critical services for the class. If the Court has any further questions about specific time billers, I am happy and willing to provide such information.

7. In connection with this renewed fee petition, I reviewed our billing records to determine the relative amount of lodestar we devoted to the case at various points in time. In that regard, I determined that the Quinn Emanuel team billed approximately one third of the total lodestar it submits here (*i.e.*, for work performed through July 2020) *after* the Federal Circuit issued its *Moda* opinion. In other words, we billed fully one third of our time when the claims were at their riskiest, because the Federal Circuit had at that point concluded the claims were not legally viable. But we believed it was important to devote every resource available to revive the claims, either via an *en banc* decision from the Federal Circuit or from the Supreme Court itself.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 2, 2023, at Los Angeles, California.



Adam B. Wolfson

| Attorney/Paralegal Name | Title | Bar Year | Office | 2023 Hourly Rate | Total Hours Billed | Total Lodestar / Year |
|------------------------------|-------------|----------|---------------|------------------|--------------------|-----------------------|
| Adam Wolfson - 2016 | Partner | 2005 | Los Angeles | | 246.70 | |
| Adam Wolfson - 2017 | Partner | 2005 | Los Angeles | | 222.10 | |
| Adam Wolfson - 2018 | Partner | 2005 | Los Angeles | | 150.00 | |
| Adam Wolfson - 2019 | Partner | 2005 | Los Angeles | | 56.30 | |
| Adam Wolfson - 2020 | Partner | 2005 | Los Angeles | | 77.60 | |
| Alec Levy - 2016 | Associate | 2014 | Chicago | | 3.90 | |
| Alexander Resar - 2020 | Associate | 2017 | New York | | 74.30 | |
| Allison Huebert - 2020 | Associate | 2012 | Chicago | | 99.50 | |
| Amanda McGuire - 2020 | Paralegal | NA | Chicago | | 7.20 | |
| Andrew H. Schapiro - 2019 | Partner | 1990 | Chicago | | 37.00 | |
| Andrew H. Schapiro - 2020 | Partner | 1990 | Chicago | | 52.70 | |
| Andrew Thompson - 2016 | Law Clerk | 2018 | Los Angeles | | 53.20 | |
| Arthur M. Roberts - 2016 | Associate | 2008 | San Francisco | | 142.30 | |
| Arthur M. Roberts - 2017 | Associate | 2008 | San Francisco | | 303.50 | |
| Arthur M. Roberts - 2017 | Associate | 2008 | San Francisco | | 21.40 | |
| Arthur M. Roberts - 2018 | Of Counsel | 2008 | San Francisco | | 1.10 | |
| Benjamin Berkman - 2020 | Associate | 2015 | Chicago | | 246.00 | |
| Cleland B. Welton, II - 2019 | Of Counsel | 2009 | New York | | 4.20 | |
| David Lakin - 2020 | Associate | 2017 | Chicago | | 10.00 | |
| David M. Cooper - 2020 | Partner | 2004 | New York | | 128.10 | |
| Eric D. Winston - 2016 | Partner | 1998 | Los Angeles | | 7.20 | |
| Fahri Abduhalikov - 2017 | Paralegal | NA | Washington DC | | 2.60 | |
| Fred G. Bennett - 2017 | Partner | 1973 | Los Angeles | | 17.50 | |
| Harry Larson - 2020 | Associate | 2019 | Chicago | | 126.70 | |
| Hunter B. Thomson - 2016 | Associate | 2014 | New York | | 55.70 | |
| Hunter B. Thomson - 2016 | Associate | 2014 | New York | | 148.50 | |
| Hunter B. Thomson - 2017 | Associate | 2014 | New York | | 127.70 | |
| J. D. Horton - 2015 | Partner | 1997 | Los Angeles | | 9.10 | |
| J. D. Horton - 2016 | Partner | 1997 | Los Angeles | | 1,237.70 | |
| J. D. Horton - 2017 | Partner | 1997 | Los Angeles | | 714.50 | |
| J. D. Horton - 2018 | Partner | 1997 | Los Angeles | | 295.70 | |
| J. D. Horton - 2019 | Partner | 1997 | Los Angeles | | 798.80 | |
| J. D. Horton - 2020 | Partner | 1997 | Los Angeles | | 943.00 | |
| James Zhang - 2016 | Lit Support | NA | New York | | 2.20 | |
| Katherine B. Fuller - 2016 | Paralegal | NA | Chicago | | 22.00 | |
| Katherine B. Fuller - 2017 | Paralegal | NA | Chicago | | 16.20 | |
| Katherine B. Fuller - 2018 | Paralegal | NA | Chicago | | 33.10 | |

| Attorney/Paralegal Name | Title | Bar Year | Office | 2023 Hourly Rate | Total Hours Billed | Total Lodestar / Year |
|----------------------------|-------------|----------|-------------|------------------|---------------------|------------------------|
| Katherine B. Fuller - 2019 | Paralegal | NA | Chicago | | 25.10 | |
| Katherine B. Fuller - 2020 | Paralegal | NA | Chicago | | 60.10 | |
| Kathleen Sullivan - 2020 | Partner | 1981 | Los Angeles | | 5.50 | |
| Keith Errick - 2019 | Lit Support | NA | New York | | 0.40 | |
| Margaret Haas - 2016 | Associate | 2012 | Chicago | | 143.90 | |
| Margaret Haas - 2016 | Associate | 2012 | Chicago | | 110.50 | |
| Margaret Haas - 2017 | Associate | 2012 | Chicago | | 233.70 | |
| Margaret Haas - 2017 | Associate | 2012 | Chicago | | 67.60 | |
| Margaret Haas - 2018 | Associate | 2012 | Chicago | | 87.10 | |
| Margaret Haas - 2018 | Associate | 2012 | Chicago | | 7.60 | |
| Margaret Haas - 2019 | Associate | 2012 | Chicago | | 207.80 | |
| Margaret Haas - 2019 | Associate | 2012 | Chicago | | 39.00 | |
| Margaret Haas - 2020 | Associate | 2012 | Chicago | | 140.90 | |
| Marot Lorimer - 2017 | Paralegal | NA | Chicago | | 158.10 | |
| Marot Lorimer - 2018 | Paralegal | NA | Chicago | | 7.40 | |
| Matthew A. Bergjans - 2015 | Associate | 2014 | Los Angeles | | 15.80 | |
| Matthew A. Bergjans - 2016 | Associate | 2014 | Los Angeles | | 74.70 | |
| Rachel Appleton - 2016 | Associate | 2011 | Los Angeles | | 1.80 | |
| Stephen Swedlow - 2016 | Partner | 1995 | Chicago | | 592.80 | |
| Stephen Swedlow - 2017 | Partner | 1995 | Chicago | | 362.40 | |
| Stephen Swedlow - 2018 | Partner | 1995 | Chicago | | 176.10 | |
| Stephen Swedlow - 2019 | Partner | 1995 | Chicago | | 230.10 | |
| Stephen Swedlow - 2020 | Partner | 1995 | Chicago | | 381.30 | |
| Steven M. Edwards - 2016 | Of Counsel | 1972 | New York | | 4.00 | |
| Teri Juarez - 2019 | Paralegal | NA | Los Angeles | | 0.80 | |
| Teri Juarez - 2020 | Paralegal | NA | Los Angeles | | 0.80 | |
| | | | | | 9,630.60 | \$16,083,217.00 |
| | | | | | | |
| | | | | | Costs (7/30/20) | \$394,491.64 |
| | | | | | | |
| | | | | | Fees + Costs | \$16,477,708.64 |

| Rates | Total Lodestar | 5% Fee | Implied Multiplier |
|--------------|-----------------|------------------|--------------------|
| Historical | \$9,698,059.50 | \$184,848,671.67 | 19.06 |
| 2020 Current | \$11,372,851.50 | \$184,848,671.67 | 16.25 |
| 2023 Current | \$16,083,217.00 | \$184,848,671.67 | 11.49 |