

EXHIBIT B

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16 UNITED STATES DISTRICT COURT
 17
 18 NORTHERN DISTRICT OF CALIFORNIA

19	PURPLE MOUNTAIN TRUST, Individually)	Case No. 3:18-cv-03948-JD
	and on Behalf of All Others Similarly Situated,)	
20	Plaintiff,)	<u>CLASS ACTION</u>
21	vs.)	DECLARATION OF ROSS D. MURRAY
22	WELLS FARGO & COMPANY, et al.,)	REGARDING NOTICE DISSEMINATION,
	Defendants.)	PUBLICATION, AND REQUESTS FOR
23		EXCLUSION RECEIVED TO DATE
24		DATE: August 17, 2023
		TIME: 10:00 a.m.
25		CTRM: 11, 19th Floor
26		JUDGE: Honorable James Donato

1 I, ROSS D. MURRAY, declare and state as follows:

2 1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”),
3 located at 1 McInnis Parkway, Suite 250, San Rafael, California. The following statements are
4 based on my personal knowledge and information provided to me by other Gilardi employees and
5 if called to testify I could and would do so competently.

6 2. Pursuant to this Court’s May 1, 2023 Order Preliminarily Approving Settlement
7 and Providing for Notice (ECF 230) (“Notice Order”)¹, Gilardi was appointed to serve as the
8 Claims Administrator in connection with the above-captioned litigation (the “Action”).² I oversaw
9 the notice services that Gilardi provided in accordance with the Notice Order.

10 3. I submit this declaration in order to provide the Court and the parties to the Action
11 with information regarding: (i) emailing and mailing of the Court-approved Postcard Notice
12 (attached hereto as Exhibit A), and if requested, the Notice of Proposed Settlement of Class Action
13 (the “Notice”) and the Proof of Claim Form (the “Proof of Claim”) (collectively, the “Claim
14 Package”) (attached hereto as Exhibit B); (ii) publication of the Summary Notice; (iii)
15 establishment of the website and toll-free telephone number dedicated to this Action; and (iv) the
16 number of requests for exclusion received to date by Gilardi in conjunction with the mailing of the
17 Notice of Pendency of Class Action (“Notice of Pendency”) beginning in November, 2022.

18 **DISSEMINATION OF NOTICE**

19 4. Pursuant to the Notice Order, Gilardi provided notice of the proposed settlement of
20 this Action. The Class consists of all persons and entities who purchased or otherwise acquired
21 the common stock of Wells Fargo & Co. during the period from November 3, 2016 through August
22 3, 2017, inclusive (the “Class Period”), and were damaged thereby. Excluded from the Class are
23 Defendants, present or former executive officers of Wells Fargo and their immediate family

24 _____
25 ¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings
26 ascribed to them in the Stipulation of Settlement (the “Stipulation”) (ECF 220-2), which is
available on the website established for the Settlement at
www.WellsFargo2018SecuritiesLitigation.com.

27 ² Gilardi was previously appointed as the Notice Administrator to provide notice of the pendency
28 of this Action. ECF 219.

1 members (as defined in 17 C.F.R. §229.404, Instructions (1)(a)(iii) and (1)(b)(ii)).
2 Notwithstanding the foregoing exclusions, no Investment Vehicle will be excluded from the
3 Settlement Class. Also excluded from the Class is any person or entity that timely and validly
4 requested exclusion, as explained in the Notice of Pendency.

5 5. As directed in the Notice Order, Gilardi emailed an electronic version of the
6 Postcard Notice to potential Class Members where email addresses were available. For potential
7 Class Member records where the email was undeliverable, or where Gilardi only had record of a
8 physical address, Gilardi mailed the Postcard Notice.

9 6. Gilardi used the previous list of stockholders compiled in connection with
10 dissemination of the Notice of Pendency as the basis for the mailing list for the Postcard Notice,
11 as the Class definition and Class Period have not changed since the mailing list was compiled for
12 the Notice of Pendency. The list was reviewed to identify and eliminate duplicate entries and
13 incomplete data. After cleansing the data, Gilardi sent 139,375 email Postcard Notices and
14 258,190 Postcard Notices via First-Class Mail, commencing on May 22, 2023.

15 7. In addition, on May 22, 2023, as part of its normal mailing procedures, Gilardi
16 mailed, by First-Class Mail, Postcard Notices and cover letters to 279 brokerages, custodial banks,
17 and other institutions (“Nominee Holders”) that hold securities in “street name” as nominees for
18 the benefit of their customers who are the beneficial owners of the securities. The Nominee
19 Holders also include a group of filers/institutions who have requested notification of every
20 securities case. These Nominee Holders are included in a proprietary database created and
21 maintained by Gilardi. In Gilardi’s experience, the Nominee Holders included in this proprietary
22 database represent a significant majority of the beneficial holders of securities. The cover letter
23 accompanying the Postcard Notices advised the Nominee Holders of the Action and requested
24 their cooperation in forwarding the Postcard Notices to potential Class Members. In the more than
25 three decades that Gilardi has been providing notice and claims administration services in
26 securities class actions, Gilardi has found the majority of potential class members hold their
27 securities in street name and are notified through the Nominee Holders. Gilardi also mailed
28 Postcard Notices and cover letters to the 4,440 institutions included on the U.S. Securities and

1 Exchange Commission's ("SEC") list of active brokers and dealers at the time of mailing. A
2 sample of the cover letter mailed to Nominee Holders and the institutions included on the SEC's
3 list of active brokers and dealers is attached hereto as Exhibit C.

4 8. On May 22, 2023, Gilardi also delivered electronic copies of the Postcard Notice
5 to 390 registered electronic filers who are qualified to submit electronic claims. These filers are
6 primarily institutions and third-party filers who typically file numerous claims on behalf of
7 beneficial owners for whom they act as trustees or fiduciaries.

8 9. As part of the notice program for this Action, on May 22, 2023, Gilardi also
9 delivered an electronic copy of the Postcard Notice and the Claim Package via email to be
10 published by the Depository Trust Company ("DTC") on the DTC Legal Notice System ("LENS").
11 LENS enables the participating bank and broker nominees to review the documents and contact
12 Gilardi for copies of the Postcard Notice for their beneficial holders.

13 10. Gilardi has acted as a repository for shareholder and nominee inquiries and
14 communications received in this Action. In this regard, Gilardi has forwarded the Postcard Notice
15 on request to nominees who purchased or acquired Wells Fargo common stock for the beneficial
16 interest of other persons. Gilardi has also forwarded the Postcard Notice directly to beneficial
17 owners upon receipt of the names and addresses from such beneficial owners or nominees.

18 11. Following the initial mailing, Gilardi received 12 responses to the outreach efforts
19 described above, which included computer files containing a total of 148,299 names and addresses
20 of potential Class Members, and 63 email addresses. In addition, 29 institutions requested that
21 Gilardi send them a total of 540,235 copies of the Postcard Notice for forwarding directly to their
22 clients. Gilardi also received 375 requests for Claim Packages from potential Class Members.
23 Gilardi has mailed 10,394 Postcard Notices as a result of emails that bounced back or were
24 otherwise undeliverable. Each of these requests has been completed in a timely manner.

25 12. As of July 12, 2023, Gilardi has emailed a total of 139,828 Postcard Notices and
26 mailed a total of 961,837 Postcard Notices to potential Class Members and nominees, for a total
27 of 1,101,665 Postcard Notices. Gilardi has also mailed a total of 375 Claim Packages to potential
28

1 Class Members. Additionally, Gilardi received a message from one institution noting that they
2 planned to send an estimated 186,877 emails directly to their clients.

3 **PUBLICATION OF THE SUMMARY NOTICE**

4 13. In accordance with the Notice Order, on May 26, 2023, Gilardi caused the
5 Summary Notice to be published in *The Wall Street Journal* and to be transmitted over *Business*
6 *Wire*, as shown in the confirmations of publication attached hereto as Exhibit D.

7 **TELEPHONE HELPLINE AND WEBSITE**

8 14. On November 18, 2022, in conjunction with the mailing of the Notice of Pendency,
9 Gilardi established and continues to maintain a case-specific, toll-free telephone helpline, 1-888-
10 416-6687, to accommodate potential Class Member inquiries. The toll-free number was set forth
11 in the Postcard Notice, the Claim Package, the Summary Notice, and on the case website. Gilardi
12 has been and will continue to promptly respond to all inquiries to the toll-free telephone helpline.

13 15. On November 18, 2022, in conjunction with the mailing of the Notice of Pendency,
14 Gilardi established and continues to maintain a website dedicated to this Action
15 (www.WellsFargo2018SecuritiesLitigation.com) to provide additional information to Class
16 Members and to provide answers to frequently asked questions. The web address was set forth in
17 the Postcard Notice, the Claim Package, and the Summary Notice. The website includes
18 information regarding the Action and the Settlement, including the objection and claim filing
19 deadlines, and the date and time of the Court's Settlement Hearing. Copies of the Notice, Proof
20 of Claim, Stipulation, and Notice Order are posted on the website and are available for
21 downloading. Class Members can also complete and submit a Proof of Claim through the website.

22 **REQUESTS FOR EXCLUSION RECEIVED TO DATE**

23 16. The Notice of Pendency informed potential Class Members that written requests
24 for exclusion from the Class were to be mailed to *Wells Fargo 2018 Securities Litigation, c/o*
25 *Gilardi & Co. LLC, ATTN: EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100*, such that
26 they were postmarked no later than January 26, 2023. The Notice of Pendency also set forth the
27 information that must be included in each request for exclusion. As of February 7, 2023, Gilardi
28 reported that it had received 64 timely requests for exclusion, which represent 4,104 shares of

1 Wells Fargo common stock, and three requests for exclusion that were postmarked after the
2 January 26, 2023 deadline, and which represent 206 shares of Wells Fargo common stock. *See*
3 Declaration of Ross D. Murray Regarding Notice of Pendency Dissemination, Publication of
4 Notice of Pendency, Requests for Exclusion Received to Date, Settlement Notice Plan, and Claims
5 Administration. ECF 220-4.

6 17. Since February 7, 2023, and as of the date of this declaration, Gilardi has received
7 one additional timely request for exclusion (received February 9, 2023, but postmarked January
8 19, 2023), with no shares represented, and five additional late requests for exclusion, which
9 represent 1,441 shares. *See* Exhibit E attached hereto.

10 I declare under penalty of perjury that the foregoing is true and correct and that this
11 declaration was executed this 12th day of July, 2023, at San Rafael, California.

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ROSS D. MURRAY

EXHIBIT A

Wells Fargo 2018 Securities Litigation
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040

LEGAL NOTICE

Purple Mountain Trust v.

Wells Fargo & Company, et al.

No. 3:18-cv-03948-JD (N.D. Cal.)

www.WellsFargo2018SecuritiesLitigation.com

Court-Ordered Legal Notice

(Forwarding Service Requested)

Important Information about a
Securities Class Action Settlement.

You may be entitled to a payment.

This Notice may affect your legal rights.

Please read it carefully.



VISIT THE
SETTLEMENT
WEBSITE BY
SCANNING
THE PROVIDED
QR CODE

WEF2



Postal Service: Please Do Not Mark Barcode

WEF2 - «Claim8»-«CkDig»

«FirstName» «LastName»

«Name1»

«Name2»

«Name3»

«Name4»

«Addr1» «Addr2»

«City», «State»«FProv» «Zip»«FZip»

«FCountry»

THIS CARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT
VISIT WWW.WELLSFARGO2018SECURITIESLITIGATION.COM OR CALL 1-888-416-6687 FOR MORE INFORMATION

If you purchased or otherwise acquired Wells Fargo & Company (“Wells Fargo” or the “Company”) common stock from November 3, 2016 through August 3, 2017, inclusive, you could be entitled to a payment from a proposed settlement (“Settlement”) reached in this action (“Action”). Your rights may be affected by this Action and the Settlement. A hearing will be held on August 17, 2023, at 10:00 a.m., before the Honorable James Donato at the United States District Court for the Northern District of California, Courtroom 11 - 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, to determine whether the proposed Settlement of the Action against Defendants Wells Fargo and Timothy J. Sloan for \$300 million and the Plan of Allocation should be approved as fair, reasonable, and adequate and whether the Action should be dismissed with prejudice against the Defendants, as set forth in the Stipulation of Settlement (“Stipulation”) filed with the Court; and whether Lead Counsel’s application for an award of attorneys’ fees of up to 25% of the Settlement Amount, plus interest, and expenses not to exceed \$2 million, plus interest, should be granted.

The proposed Settlement would resolve a class action lawsuit alleging that, in violation of the U.S. federal laws, Defendants made material misrepresentations and omissions, with scienter, regarding force-placed unneeded Collateral Protection Insurance (“CPI”) on hundreds of thousands of its customers and failure to refund unearned guaranteed auto protection (“GAP”) premiums to tens of thousands of customers. Defendants deny the allegations. For a full description of the Settlement and your rights and to make a claim, you may obtain the Stipulation, long-form Notice of Proposed Settlement of Class Action, and the Proof of Claim Form (“Proof of Claim”) by visiting the website: www.WellsFargo2018SecuritiesLitigation.com (the “Website”) or you may request copies from the Claims Administrator by: (i) mail: *Wells Fargo 2018 Securities Litigation*, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040; or (ii) calling toll-free: 1-888-416-6687.

To qualify for payment, you must submit a valid Proof of Claim, with supporting documentation, postmarked no later than August 21, 2023. You will be bound by any Judgment entered in the Action, regardless of whether you submit a Proof of Claim, unless you previously excluded yourself from the Class. If you previously excluded yourself, you cannot get money from this Settlement. If you did not exclude yourself and stayed in the Class, you may object to the Settlement, Plan of Allocation, or request for award of attorneys’ fees and expenses no later than July 27, 2023. The long-form Notice and the Website explain how to object.

Lead Plaintiff and the Class are represented by Lead Counsel: Scott H. Saham, Esq., Robbins Geller Rudman & Dowd LLP, 655 W. Broadway, Suite 1900, San Diego, CA 92101, 1-800-449-4900, settlementinfo@rgrdlaw.com. You may, but do not have to, attend the Court hearing to be heard. The Court reserves the right to hold the Settlement Hearing telephonically or by other virtual means.

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PURPLE MOUNTAIN TRUST, Individually and on)	
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	Case No. 3:18-cv-03948-JD
vs.)	<u>CLASS ACTION</u>
WELLS FARGO & COMPANY, et al.,)	
)	
Defendants.)	

NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

A Federal Court Authorized This Notice. This Is Not a Solicitation from a Lawyer.

NOTICE OF PENDENCY OF CLASS ACTION: Please be advised that your rights may be affected by the above-captioned class action lawsuit pending in this Court (the “Action”) if you purchased or acquired the common stock of Wells Fargo & Company (“Wells Fargo” or the “Company”) from November 3, 2016 through August 3, 2017, inclusive (the “Class Period”).

NOTICE OF SETTLEMENT: Please also be advised that lead plaintiff Construction Laborers Pension Trust for Southern California (“Lead Plaintiff”), on behalf of the Class (as defined in ¶1 below), has reached a proposed settlement of the Action for a total of \$300 million in cash that will resolve all claims in the Action (the “Settlement”).

This Notice explains important rights you may have, including your possible receipt of cash from the Settlement. Your legal rights will be affected whether or not you act. Please read this Notice carefully.

1. **Description of the Action and the Class:** This Notice relates to a proposed Settlement of a class action lawsuit pending against the following defendants: Wells Fargo and Timothy J. Sloan (“Defendants”) (collectively, with Lead Plaintiff, the “Settling Parties”). The proposed Settlement, if approved by the Court, will apply to the following Class (the “Class”): all Persons and entities who purchased or otherwise acquired the common stock of Wells Fargo during the period from November 3, 2016 through August 3, 2017, inclusive, and were damaged thereby. Excluded from the Class are Defendants, present or former executive officers of Wells Fargo and their immediate family members (as defined in 17 C.F.R. §229.404, Instructions (1)(a)(iii) and (1)(b)(ii)). Notwithstanding the foregoing exclusions, no Investment Vehicle shall be excluded from the Settlement Class. Anyone who previously validly excluded themselves from the class certified by the Court is not a member of the Settlement Class. Anyone with questions as to whether or not they are excluded from the Class may call the Claims Administrator toll-free at 1-888-416-6687.

2. **Statement of Class’s Recovery:** Subject to Court approval, and as described more fully in ¶¶46-51 below, Lead Plaintiff, on behalf of the Class, has agreed to settle all Released Claims (as defined in ¶47 below) against Defendants and other Released Defendant Parties (as defined in ¶49 below) in exchange for a settlement payment of \$300 million in cash (the “Settlement Amount”) to be deposited into an escrow account. The Net Settlement Fund (the Settlement Fund less Taxes and Tax Expenses, Notice and Administration Expenses, and attorneys’ fees and litigation expenses) will be distributed in accordance with a plan of allocation (the “Plan of Allocation”) that will be approved by the Court and will determine how the Net Settlement Fund shall be distributed to members of the Class. The Plan of Allocation is a basis for determining the relative positions of Class Members for purposes of allocating the Net Settlement Fund. The proposed Plan of Allocation is included in this Notice, and may be modified by the Court without further notice.

3. **Statement of Average Distribution Per Share:** The Settlement Fund consists of the \$300 million Settlement Amount plus interest earned. Assuming all potential Class Members elect to participate, the estimated average recovery is \$0.66 per damaged share before fees and expenses. Class Members may recover more or less than this amount depending on, among other factors, the aggregate value of the Recognized Claims represented by valid and acceptable Claim Forms as explained in the Plan of Allocation; when their shares were purchased or acquired and the price at the time of purchase or acquisition; whether the shares were sold, and if so, when they were sold and for how much. In addition, the actual recovery of Class Members may be further reduced by the payment of fees and costs from the Settlement Fund, as approved by the Court.

4. **Statement of the Parties' Position on Damages:** Defendants deny all claims of wrongdoing, that they engaged in any wrongdoing, that they are liable to Lead Plaintiff and/or the Class and that Lead Plaintiff or other members of the Class suffered any injury. Moreover, the parties do not agree on the amount of recoverable damages if Lead Plaintiff was to prevail on each of the claims. The issues on which the parties disagree include, but are not limited to, whether: (i) the statements made or facts allegedly omitted were material, false or misleading; (ii) Defendants are otherwise liable under the securities laws for those statements or omissions or any alleged scheme to defraud; and (iii) all or part of the damages allegedly suffered by members of the Class were caused by economic conditions or factors other than the allegedly false or misleading statements or omissions.

5. **Statement of Attorneys' Fees and Expenses Sought:** Lead Counsel will apply to the Court for an award of attorneys' fees from the Settlement Fund of no more than 25% of the Settlement Amount, plus interest earned at the same rate and for the same period as earned by the Settlement Fund. In addition, Lead Counsel also will apply to the Court for payment from the Settlement Fund for Lead Counsel's litigation expenses (reasonable expenses or charges of Lead Counsel in connection with commencing and prosecuting the Action), in a total amount not to exceed \$2 million, plus interest earned at the same rate and for the same period as earned by the Settlement Fund. If the Court approves Lead Counsel's fee and expense application, the estimated average cost per damaged share is \$0.17. In addition, Lead Counsel will apply for an award to Lead Plaintiff Construction Laborers Pension Trust for Southern California in an amount not to exceed \$15,000.00 pursuant to 15 U.S.C. §78u-4(a)(4) in connection with its representation of the Class.

6. **Identification of Attorneys' Representatives:** Lead Plaintiff and the Class are being represented by Robbins Geller Rudman & Dowd LLP ("Lead Counsel"). Any questions regarding the Settlement should be directed to Scott H. Saham, Esq., at Robbins Geller Rudman & Dowd LLP, 655 W. Broadway, Suite 1900, San Diego, CA 92101, 1-800-449-4900, settlementinfo@rgrdlaw.com.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT	
DO NOTHING	Get no payment. Remain a Class Member. Give up your rights.
REMAIN A MEMBER OF THE CLASS AND SUBMIT A CLAIM FORM POSTMARKED OR SUBMITTED ONLINE NO LATER THAN AUGUST 21, 2023	This is the only way to be potentially eligible to receive a payment. If you wish to obtain a payment as a member of the Class, you will need to file a claim form (the "Claim Form" or "Proof of Claim Form"), postmarked or submitted online no later than August 21, 2023.
OBJECT TO THE SETTLEMENT SO THAT IT IS FILED OR POSTMARKED NO LATER THAN JULY 27, 2023	Write to the Court about your view on the Settlement, or why you do not think the Settlement is fair to the Class. If you did not exclude yourself from the Class by January 26, 2023, you may object to the Settlement, the Plan of Allocation, or the request for attorneys' fees and litigation expenses. You must still submit a Claim Form in order to be potentially eligible to receive any money from the Settlement Fund.
GO TO THE HEARING ON AUGUST 17, 2023, AT 10:00 A.M., AND FILE A NOTICE OF INTENTION TO APPEAR SO THAT IT IS FILED OR POSTMARKED NO LATER THAN JULY 27, 2023	Ask to speak in Court about the fairness of the Settlement, the proposed Plan of Allocation, or the request for attorneys' fees and litigation expenses.

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WHY DID I GET THIS NOTICE?

7. The purpose of this Notice is to inform you about: (i) this Action, (ii) the terms of the proposed Settlement, and (iii) your rights in connection with a hearing to be held before the United States District Court, Northern District of California (the “Court”), on August 17, 2023, at 10:00 a.m., to consider the fairness, reasonableness, and adequacy of the Settlement and related matters. This Notice also describes the steps to be taken by those who wish to seek to be potentially eligible to share in the distribution of the Net Settlement Fund in the event the Settlement is approved by the Court.

8. A class action is a type of lawsuit in which the claims of a number of individuals are resolved together, thus providing the class members with both consistency and efficiency. In a class action lawsuit, the Court selects one or more people, known as class representatives, to sue on behalf of all people with similar claims, commonly known as the class or the class members. In the Action, the Court has certified the Class and appointed Lead Plaintiff Construction Laborers Pension Trust for Southern California as the representative of the Class and Lead Counsel as Class Counsel.

9. The Court in charge of this case is the United States District Court for the Northern District of California, and the case is known as *Purple Mountain Tr. v. Wells Fargo & Co., et al.*, No. 3:18-cv-03948-JD (N.D. Cal.). The judge presiding over this case is the Honorable James Donato, United States District Judge. The institution which is suing is called Lead Plaintiff, and those who are being sued are called Defendants. In this case, the Defendants are Wells Fargo and Timothy J. Sloan.

10. This Notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them. The purpose of this Notice is to inform you of this case, that it is a class action, and how you might be affected. It also informs 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 proposed Settlement, the proposed Plan of Allocation, and the application by Lead Counsel for attorneys’ fees and litigation expenses (the “Settlement Hearing”).

11. The Settlement Hearing will be held on August 17, 2023, at 10:00 a.m., before the Honorable James Donato, at the United States District Court, Northern District of California, Courtroom 11 – 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, for the following purposes:

- (a) to determine whether the proposed Settlement on the terms and conditions provided for in the Stipulation is fair, reasonable, and adequate and should be approved by the Court;
- (b) to determine whether the Judgment as provided for under the Stipulation of Settlement dated February 6, 2023 (the “Stipulation”) should be entered;
- (c) to determine whether the proposed Plan of Allocation for the net proceeds of the Settlement is fair and reasonable and should be approved by the Court;
- (d) to determine whether the application by Lead Counsel for an award of attorneys’ fees and litigation expenses should be approved; and
- (e) to rule upon such other matters as the Court may deem appropriate.

12. This Notice does not express 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, payments to Authorized Claimants will be made after any appeals are resolved, and after the completion of all claims processing. This process takes time. Please be patient.

WHAT IS THIS CASE ABOUT? WHAT HAS HAPPENED SO FAR?

13. Lead Plaintiff alleges that during the period from November 3, 2016 through August 3, 2017, Defendants made materially false or misleading statements in violation of §§10(b) and 20(a) of the Securities Exchange Act of 1934 (“Exchange Act”) and Rule 10b-5 promulgated thereunder, which caused the price of Wells Fargo stock to trade at artificially inflated prices. Specifically, Lead Plaintiff alleges that Wells Fargo concealed that it improperly force-placed unneeded Collateral Protection Insurance (“CPI”) on hundreds of thousands of its customers and failed to refund unearned guaranteed auto protection (“GAP”) premiums to tens of thousands of customers, causing more than 20,000 of its customers to have their cars repossessed. Lead Plaintiff further alleges that the Company knew of these issues but never disclosed them to investors or the public. Lead Plaintiff alleges that the facts did not come to light until they were published by the *New York Times* in July of 2017. Lead Plaintiff alleges that persons who purchased Wells Fargo stock during the Class Period suffered economic losses when the price of Wells Fargo stock declined as a result of two alleged corrective disclosures that revealed the CPI and GAP issues to investors.

14. On August 31, 2018, Lead Plaintiff filed its Consolidated Complaint for Violation of the Federal Securities Laws (“Complaint”). On November 2, 2018, Defendants moved to dismiss this Complaint, which was opposed by Lead Plaintiff. On January 10, 2020, the Court entered an order granting in part and denying in part the motion to dismiss. Defendants answered the Complaint on February 28, 2020.

15. The parties conducted extensive discovery which included the exchange of more than 505,000 pages of documents, 19 fact witness depositions and 152 pages of admissions and sworn interrogatory responses. On October 15, 2020, Lead Plaintiff moved to certify the class. Following full briefing, on August 15, 2022, the Court granted the motion. Notice of Pendency was emailed and mailed (where no email was available) to the Class beginning on November 18, 2022.

16. On January 14, 2022, Lead Defendants moved for summary judgment. Defendants also moved to exclude or strike portions of the testimony of all Lead Plaintiff's experts. Lead Plaintiff filed its oppositions to each of these motions on February 23, 2022. The parties also engaged in extensive meet-and-confer discussions regarding the scope of admissible evidence at trial, and the parties began briefing motions *in limine*. The parties, among other things, also exchanged trial exhibits and began preparing deposition designations, proposed jury instructions, and verdict forms.

17. In the course of the Action, the Settling Parties engaged the services of the Honorable Layn R. Phillips (Ret.), a nationally recognized mediator. The Settling Parties engaged in settlement discussions with Judge Phillips on multiple occasions and ultimately an agreement was reached to settle the Action for \$300 million.

HOW DO I KNOW IF I AM AFFECTED BY THE SETTLEMENT?

18. If you are a member of the Class, you are subject to the Settlement unless you timely requested to be excluded. The Class consists of all Persons and entities who purchased or otherwise acquired the common stock of Wells Fargo during the period from November 3, 2016 through August 3, 2017, inclusive, and were damaged thereby. Excluded from the Class are Defendants, present or former executive officers of Wells Fargo and their immediate family members (as defined in 17 C.F.R. §229.404, Instructions (1)(a)(iii) and (1)(b)(ii)). Notwithstanding the foregoing exclusions, no Investment Vehicle shall be excluded from the Settlement Class. Anyone with questions as to whether or not they are excluded from the Class may call the Claims Administrator toll-free at 1-888-416-6687.

RECEIPT OF THIS NOTICE DOES NOT NECESSARILY MEAN THAT YOU ARE A CLASS MEMBER OR THAT YOU ARE ENTITLED TO RECEIVE PROCEEDS FROM THE SETTLEMENT. IF YOU WISH TO BE POTENTIALLY ELIGIBLE TO RECEIVE A DISTRIBUTION OF THE SETTLEMENT PROCEEDS, YOU MUST COMPLETE, SIGN, AND SUBMIT THE ENCLOSED CLAIM FORM POSTMARKED NO LATER THAN AUGUST 21, 2023. YOU MAY ALSO SUBMIT A CLAIM FORM ONLINE AT WWW.WELLSFARGO2018SECURITIESLITIGATION.COM BY AUGUST 21, 2023.

WHAT ARE LEAD PLAINTIFF'S REASONS FOR THE SETTLEMENT?

19. Lead Plaintiff and Lead Counsel believe that the claims asserted against Defendants have merit. Lead Plaintiff and Lead Counsel recognize, however, the expense and length of continued proceedings necessary to pursue their claims against Defendants through trial and appeals, as well as the difficulties in establishing liability and damages. Lead Plaintiff and Lead Counsel have considered the amount of the Settlement, as well as the uncertain outcome and risk in complex lawsuits like this one. Such risks include, in particular, the risk that the pending motion for summary judgment would be granted and the risk, among others, that Lead Plaintiff would be unsuccessful in proving that Defendants' alleged misstatements were materially false and misleading, made with scienter (that is, the requisite state of mind), or caused compensable damages to the Class.

20. In light of the amount of the Settlement and the immediacy of recovery to the Class, Lead Plaintiff and Lead Counsel believe that the proposed Settlement is fair, reasonable and adequate, and in the best interests of the Class. Lead Plaintiff and Lead Counsel believe that the Settlement provides a substantial benefit now, namely \$300 million in cash (less the various deductions described in this Notice), as compared to the risk that the claims would produce a smaller recovery, or no recovery after resolution of Defendants' pending summary judgment motion, trial and appeals, possibly years in the future.

21. Defendants have denied and continue to deny each and all of the claims alleged by Lead Plaintiff in the Action. Defendants expressly have denied and continue to deny all charges of wrongdoing or liability against them arising out of any of the conduct, statements, acts or omissions alleged, or that could have been alleged, in the Action. Defendants also have denied and continue to deny, among other things, the allegations that Lead Plaintiff or the Class have suffered any damage, that Lead Plaintiff or the Class was harmed by the conduct alleged in the Action, or that the Action is properly certifiable as a class action.

WHAT MIGHT HAPPEN IF THERE WERE NO SETTLEMENT?

22. If there were no Settlement and Lead Plaintiff failed to establish any essential legal or factual element of the alleged claims, neither Lead Plaintiff nor the Class would recover anything from Defendants. Also, if Defendants were successful in proving any of their defenses, the Class likely would recover substantially less than the amount provided in the Settlement, or nothing at all.

HOW MUCH WILL MY PAYMENT BE?

23. Defendants have agreed to cause to be paid Three Hundred Million Dollars (\$300,000,000.00) in cash into escrow for the benefit of the Class. At this time, it is not possible to make any determination as to how much individual Class Members may receive from the Settlement. Lead Plaintiff has proposed a plan for allocating the Net Settlement Fund to those Class Members who timely submit valid Proof of Claim Forms. The Plan of Allocation proposed by Lead Plaintiff is set forth below, and additional information is available on the case-specific website, www.WellsFargo2018SecuritiesLitigation.com.

24. Payment pursuant to the Plan of Allocation shall be conclusive against all Authorized Claimants. No person or entity shall have any claim based on distributions made substantially in accordance with the Stipulation and the Settlement contained therein, the Plan of Allocation, or further order(s) of the Court against Lead Counsel, Lead Plaintiff, Class Members, the Claims Administrator, Defendants and the other Released Defendant Parties (defined below), or any person or entity designated by Lead Counsel. All members of the Class who fail to timely submit an acceptable Claim Form by the deadline set by the Court, or such other deadline as may be ordered by the Court, or otherwise allowed, shall be forever barred from receiving any payments pursuant to the Settlement, but will in all other respects be subject to and bound by the terms of the Settlement, including Class Members' release of all Released Claims.

25. The Court has reserved jurisdiction to allow, disallow, or adjust on equitable grounds the claim of any member of the Class.

26. The Plan of Allocation set forth below is the proposed plan submitted by Lead Plaintiff and Lead Counsel for the Court's approval. The Court may approve this plan as proposed or it may modify it without further notice to the Class.

27. Each claimant shall be deemed to have submitted to the jurisdiction of the United States District Court for the Northern District of California, with respect to his, her, or its Claim Form.

28. Persons and entities that excluded themselves from the Class will not be eligible to receive a distribution from the Net Settlement Fund and should not submit Proof of Claim Forms.

PLAN OF ALLOCATION

29. The objective of the Plan of Allocation is to equitably distribute the settlement proceeds to those Class Members who suffered economic losses as a proximate result of the alleged wrongdoing. In developing the Plan of Allocation, Lead Plaintiff's damages expert calculated the potential amount of estimated alleged artificial inflation in Wells Fargo common stock which allegedly was proximately caused by Defendants' alleged false and misleading statements and material omissions. In calculating the estimated alleged artificial inflation allegedly caused by Defendants' alleged misrepresentations and omissions, Lead Plaintiff's damages expert considered the market and industry adjusted price changes in Wells Fargo's stock price following certain corrective disclosures regarding Wells Fargo and the allegations in the Complaint.

30. The calculations made pursuant to the Plan of Allocation are not intended to be estimates of, nor indicative of, the amounts that 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.

31. In order to have recoverable damages, a disclosure of the alleged truth omitted or concealed by the misrepresentations must be the cause of the decline in the price of Wells Fargo common stock. In this case, Lead Plaintiff alleges that corrective information was released to the market after the close of trading on July 27, 2017 and August 4, 2017.

32. In order to have a "Recognized Loss Amount" under the Plan of Allocation, shares of Wells Fargo common stock must have been purchased or otherwise acquired during the Class Period and held through the issuance of at least one of the corrective disclosures.¹

¹ Any transactions in Wells Fargo common stock executed outside regular trading hours for the U.S. financial markets shall be deemed to have occurred during the next trading session.

CALCULATION OF RECOGNIZED LOSS AMOUNTS

33. Based on the formula stated below, a Recognized Loss Amount will be calculated for each purchase or acquisition of Wells Fargo 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.

34. For each share of Wells Fargo common stock purchased or otherwise acquired from November 3, 2016 through August 3, 2017, and:

- (a) Sold prior to the close of trading on July 27, 2017, the Recognized Loss Amount will be \$0.00;
- (b) Sold from July 28, 2017 through August 3, 2017, the Recognized Loss Amount will be **the lesser of**: (i) the decline in inflation during the holding period (as presented in Table A below); or (ii) the purchase price minus the sale price;
- (c) Sold from August 4, 2017, through and including the close of trading on November 1, 2017, the Recognized Loss Amount will be **the least of**: (i) the decline in inflation during the holding period (as presented in Table A below); (ii) the purchase price minus the sale price; or (iii) the purchase price minus the average closing price between August 4, 2017 and the date of sale as stated in Table B below; and
- (d) Held as of the close of trading on November 1, 2017, the Recognized Loss Amount will be **the lesser of**: (i) the decline in inflation during the holding period (as presented in Table A below); or (ii) the purchase price minus \$53.26, the average closing price for Wells Fargo common stock between August 4, 2017 and November 1, 2017 (the last entry on Table B below).²

ADDITIONAL PROVISIONS

35. The Net Settlement Fund will be allocated among all Authorized Claimants based on the amount of each Authorized Claimant's Recognized Claim (defined below).

36. If a Class Member has more than one purchase/acquisition or sale of Wells Fargo common stock, purchases/acquisitions and sales shall be matched on a First In, 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.

37. A claimant's "Recognized Claim" under the Plan of Allocation shall be the sum of his, her, or its Recognized Loss Amounts.

38. 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 shall 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. If any Authorized Claimant's Distribution Amount calculates to less than \$10.00, no distribution will be made to that claimant.

39. Purchases or acquisitions and sales of Wells Fargo common stock shall be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" date. The receipt or grant by gift, inheritance or operation of law of Wells Fargo common stock during the Class Period shall not be deemed a purchase, acquisition or sale of Wells Fargo common stock for the calculation of an Authorized Claimant's Recognized Loss Amount, nor shall the receipt or grant be deemed an assignment of any claim relating to the purchase/acquisition of any Wells Fargo common stock unless: (i) the donor or decedent purchased or otherwise acquired such Wells Fargo common stock during the Class Period; (ii) no Claim Form was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to those shares; and (iii) it is specifically so provided in the instrument of gift or assignment.

² Under §21(D)(e)(1) of the Exchange Act, "in any private action arising under this [Act] 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 statute, Recognized Loss Amounts are reduced to an appropriate extent by taking into account the closing prices of Wells Fargo common stock during the 90-day look-back period. The mean (average) closing price for Wells Fargo common stock during this 90-day look-back period was \$53.26.

40. The date of covering a “short sale” is deemed to be the date of purchase or acquisition of the Wells Fargo common stock. The date of a “short sale” is deemed to be the date of sale of the Wells Fargo common stock. Under the Plan of Allocation, however, the Recognized Loss Amount on “short sales” is zero. In the event that a claimant has an opening short position in Wells Fargo common stock, the earliest Class Period purchases or acquisitions of Wells Fargo common stock shall be matched against such opening short position, and not be entitled to a recovery, until that short position is fully covered.

41. Option contracts are not securities eligible to participate in the Settlement. With respect to Wells Fargo 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 of the common stock is the exercise price of the option.

42. If a claimant had a market gain with respect to their overall transactions in Wells Fargo common stock during the Class Period, the value of the claimant’s Recognized Claim will be zero. If a claimant suffered an overall market loss with respect to their overall transactions in Wells Fargo common stock during the Class Period but that market loss was less than the claimant’s total Recognized Claim calculated above, then the claimant’s Recognized Claim will be limited to the amount of the actual market loss. For purposes of determining whether a claimant had a market gain with respect to their overall transactions in Wells Fargo common stock during the Class Period or suffered a market loss, the Claims Administrator will determine the difference between: (i) the Total Purchase Amount;³ and (ii) the sum of the Total Sales Proceeds⁴ and Holding Value.⁵ This difference will be deemed a claimant’s market gain or loss with respect to their overall transactions in Wells Fargo common stock during the Class Period.

43. After the initial distribution of the Net Settlement Fund, the Claims Administrator shall make reasonable and diligent efforts to have Authorized Claimants cash their distribution checks. To the extent any monies remain in the fund within a reasonable time after the initial distribution, if Lead Counsel, in consultation with the Claims Administrator, determine that it is cost-effective to do so, the Claims Administrator shall conduct a re-distribution of the funds remaining after payment of any unpaid fees and expenses incurred in administering the Settlement, including for such re-distribution, to Authorized Claimants who have cashed their initial distributions. Additional re-distributions to Authorized Claimants who have cashed their prior checks may occur thereafter if Lead Counsel, in consultation with the Claims Administrator, determine 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 shall be contributed to the Investor Protection Trust.

44. Payment pursuant to the Plan of Allocation, or such other plan of allocation as may be approved by the Court, shall be conclusive against all Authorized Claimants. No person shall have any claim against Lead Plaintiff, Lead Counsel, Lead Plaintiff’s damages expert, or the Claims Administrator or other agent designated by Lead Counsel, or the Released Defendant Parties and/or their respective 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. The Lead Plaintiff, and Defendants, their respective counsel, Lead Plaintiff’s damages expert, and all other releasees shall have no responsibility or liability whatsoever for the investment or distribution of the Settlement Fund, the Net Settlement Fund, the Plan of Allocation, or the determination, administration, calculation, or payment of any Claim Form or nonperformance of the Claims Administrator, the payment or withholding of taxes (including interest and penalties) owed by the Settlement Fund, or any losses incurred in connection therewith.

45. The Plan of Allocation set forth herein is the plan that is being proposed to the Court for its approval by Lead Plaintiff after consultation with its damages expert. The Court may approve this plan as proposed or it may modify the Plan of Allocation without further notice to the Class. Any orders regarding any modification of the Plan of Allocation will be posted on the Settlement website.

³ The “Total Purchase Amount” is the total amount the claimant paid (excluding commissions and other charges) for Wells Fargo common stock purchased or acquired during the Class Period.

⁴ The Claims Administrator will match any sales of Wells Fargo common stock from the start of the Class Period through and including the close of trading on August 3, 2017 first against the claimant’s opening position (the proceeds of those sales will not be considered for purposes of calculating market gains or losses). The total amount received (excluding commissions and other charges) for the remaining sales of Wells Fargo common stock sold from the start of the Class Period through and including the close of trading on August 3, 2017 will be the “Total Sales Proceeds.”

⁵ The Claims Administrator will ascribe a value of \$52.84 per share for Wells Fargo common stock purchased or acquired during the Class Period and still held as of the close of trading on August 3, 2017 (the “Holding Value”).

TABLE A
Inflation Decline Per Date of Purchase and Date of Sale

Purchase Date	Sale Date		
	11/3/2016 - 7/27/2017	7/28/2017 - 8/3/2017	Sold on or Retained Beyond 8/4/2017
11/3/2016 - 7/27/2017	\$0.00	\$1.39	\$2.16
7/28/2017 - 8/3/2017		\$0.00	\$0.77
Purchased on or after 8/4/2017			\$0.00

TABLE B
Wells Fargo Closing Price and Average Closing Price
August 4, 2017 – November 1, 2017

Date	Closing Price	Average Closing Price Between August 4, 2017 and Date Shown	Date	Closing Price	Average Closing Price Between August 4, 2017 and Date Shown
8/4/2017	\$52.84	\$52.84	9/20/2017	\$53.75	\$51.78
8/7/2017	\$52.54	\$52.69	9/21/2017	\$54.06	\$51.85
8/8/2017	\$52.71	\$52.70	9/22/2017	\$54.25	\$51.92
8/9/2017	\$52.79	\$52.72	9/25/2017	\$54.03	\$51.98
8/10/2017	\$51.95	\$52.57	9/26/2017	\$53.80	\$52.02
8/11/2017	\$51.94	\$52.46	9/27/2017	\$54.21	\$52.08
8/14/2017	\$52.84	\$52.52	9/28/2017	\$54.25	\$52.14
8/15/2017	\$52.85	\$52.56	9/29/2017	\$55.15	\$52.21
8/16/2017	\$52.69	\$52.57	10/2/2017	\$55.47	\$52.29
8/17/2017	\$51.80	\$52.50	10/3/2017	\$55.58	\$52.37
8/18/2017	\$51.68	\$52.42	10/4/2017	\$54.96	\$52.43
8/21/2017	\$51.82	\$52.37	10/5/2017	\$55.39	\$52.50
8/22/2017	\$52.22	\$52.36	10/6/2017	\$55.58	\$52.57
8/23/2017	\$52.03	\$52.34	10/9/2017	\$55.14	\$52.62
8/24/2017	\$52.16	\$52.32	10/10/2017	\$55.61	\$52.69
8/25/2017	\$51.77	\$52.29	10/11/2017	\$55.66	\$52.75
8/28/2017	\$51.63	\$52.25	10/12/2017	\$55.21	\$52.80
8/29/2017	\$51.42	\$52.20	10/13/2017	\$53.69	\$52.82
8/30/2017	\$51.36	\$52.16	10/16/2017	\$53.80	\$52.84
8/31/2017	\$51.07	\$52.11	10/17/2017	\$53.19	\$52.84
9/1/2017	\$50.97	\$52.05	10/18/2017	\$53.41	\$52.85
9/5/2017	\$50.10	\$51.96	10/19/2017	\$53.75	\$52.87
9/6/2017	\$49.88	\$51.87	10/20/2017	\$54.92	\$52.91
9/7/2017	\$49.68	\$51.78	10/23/2017	\$54.91	\$52.94
9/8/2017	\$49.58	\$51.69	10/24/2017	\$55.42	\$52.99
9/11/2017	\$50.66	\$51.65	10/25/2017	\$55.25	\$53.03
9/12/2017	\$51.57	\$51.65	10/26/2017	\$55.62	\$53.07
9/13/2017	\$51.46	\$51.64	10/27/2017	\$55.87	\$53.12
9/14/2017	\$51.29	\$51.63	10/30/2017	\$55.85	\$53.16
9/15/2017	\$51.66	\$51.63	10/31/2017	\$56.14	\$53.21
9/18/2017	\$52.71	\$51.67	11/1/2017	\$56.21	\$53.26
9/19/2017	\$53.36	\$51.72			

WHAT RIGHTS AM I GIVING UP BY AGREEING TO THE SETTLEMENT?

46. If the Settlement is approved, the Court will enter a judgment (the “Judgment”). The Judgment will dismiss with prejudice the claims against Defendants and will provide that Lead Plaintiff, and all other Released Plaintiff Parties (as defined in ¶50 below) shall have waived, released, discharged, and dismissed each and every one of the Released Claims (as defined in ¶47 below), including Unknown Claims (as defined in ¶51 below), against each and every one of the Released Defendant Parties (as defined in ¶49 below) and shall forever be barred and enjoined from commencing, instituting, prosecuting, or maintaining any and all of the Released Claims against any and all of the Released Defendant Parties, whether or not they execute and deliver the Claim Form or share in the Settlement Fund. Claims to enforce the terms of the Settlement are not released.

47. “Released Claims” means any and all claims, debts, rights, and causes of action or liabilities of every nature and description, including any claims for damages, interest, attorneys’ fees, expert or consulting fees, and any other costs, expenses, or liability whatsoever whether known claims or Unknown Claims, whether arising under federal, state, local, statutory, common, or foreign law, or any other law, rule, or regulation, whether fixed or contingent, accrued or un-accrued, liquidated or unliquidated, at law or in equity, matured or unmatured, whether class or individual in nature, that both: (i) concern, arise out of, relate to, or are based upon the purchase or acquisition of Wells Fargo common stock during the Class Period; and (ii) were asserted or could have been asserted in this Action by Lead Plaintiff or any other member of the Class against any of the Released Defendant Parties and that arise out of or relate in any way to any of the allegations, transactions, facts, matters or occurrences, representations or omissions involved, set forth, or referred to in the Complaint. Notwithstanding the foregoing, “Released Claims” does not include claims relating to the enforcement of the Settlement or claims that could be brought in any derivative or ERISA action based on similar allegations.

48. “Released Defendants’ Claims” means all claims and causes of action of every nature and description, including both known claims and Unknown Claims, whether arising under federal, state, common or foreign law, or any other law, that Defendants could have asserted against any of the Released Plaintiff Parties, including Lead Counsel and Class Members, that arise out of or relate in any way to the institution, prosecution, or settlement of the claims in the Action, except for claims relating to the enforcement of the Settlement.

49. “Released Defendant Parties” means each and all of the Defendants and Former Defendants, and each and all of their Related Persons.

50. “Released Plaintiff Parties” means Lead Plaintiff, each and every Class Member, Lead Counsel, and each of their respective past or present trustees, officers, directors, partners, employees, contractors, auditors, principals, agents, attorneys, predecessors, successors, assigns, insurers, parents, subsidiaries, general or limited partners or partnerships, and limited liability companies; and the spouses, members of the immediate families, representatives, and heirs of any Released Plaintiff Party who is an individual, as well as any trust of which any Released Plaintiff Party is the settlor or which is for the benefit of any of their immediate family members. Released Plaintiff Parties does not include any Person who timely and validly sought exclusion from the Class.

51. “Unknown Claims” means any and all Released Claims that Lead Plaintiff or any other Class Member does not know or suspect to exist in their favor at the time of the release of the Released Defendant Parties, and any and all Released Defendants’ Claims that any Defendant does not know or suspect to exist in his, her, or its favor, which if known by him, her, or it, might have affected his, her, or its decision to enter into this Settlement, execute the Stipulation, and agree to all the various releases set forth herein, or might have affected his, her, or its decision not to object to this Settlement or not exclude himself, herself or itself from the Class. Unknown Claims include, without limitation, those claims in which some or all of the facts composing the claim may be unsuspected, undisclosed, concealed, or hidden. With respect to any and all Released Claims and Released Defendants’ Claims, the Released Parties stipulate and agree that, upon the Effective Date, Lead Plaintiff and Class Members (as regards the Released Claims) and the Defendants (as regards the Released Defendants’ Claims) shall expressly waive and relinquish, and each Class Member shall be deemed to have and by operation of law and of the Judgment shall have, expressly waived and relinquished, to the fullest extent permitted by law, any and all provisions, rights and benefits conferred by California Civil Code §1542, or any law of any state or territory of the United States, or principle of common law or of international or foreign law, which is similar, comparable, or equivalent to Cal. Civ. 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 and Defendants acknowledge, and each of the Settlement Class Members shall be deemed by operation of law to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement.

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

52. Lead Counsel has not received any payment for its services in pursuing claims against Defendants on behalf of the Class, nor has Lead Counsel been paid for its expenses. Before final approval of the Settlement, Lead Counsel intends to apply to the Court for an award of attorneys' fees from the Settlement Fund of no more than 25% of the Settlement Amount, plus interest. At the same time, Lead Counsel also intends to apply for payment from the Settlement Fund for counsel's litigation expenses in a total amount not to exceed \$2 million, plus interest. The Court will determine the amount of the award of fees and expenses. Such sums as may be approved by the Court will be paid from the Settlement Fund. Class Members are not personally liable for any such fees or expenses.

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

53. If you fall within the definition of the Class as described above, and you are not excluded by the definition of the Class and you did not elect to exclude yourself from the Class, then you are a Class Member, and you will be bound by the proposed Settlement if the Court approves it, and by any judgment or determination of the Court affecting the Class. If you are a Class Member, you must submit a Claim Form and supporting documentation to establish your potential entitlement to share in the proceeds of the Settlement. You may go to the website maintained by the Claims Administrator for the Settlement to download a Claim Form. The website is www.WellsFargo2018SecuritiesLitigation.com. You may also request a Claim Form by calling toll-free 1-888-416-6687. Those who excluded themselves from the Class, and those who do not submit timely and valid Claim Forms with adequate supporting documentation, will not be entitled to share in the proceeds of the Settlement unless otherwise ordered by the Court. Please retain all original records of your ownership of, or transactions in the shares, as they may be needed to document your claim.

54. As a Class Member, for purposes of the Settlement, you are represented by Lead Plaintiff, and Lead Counsel, unless you enter an appearance through counsel of your own choice at your own expense. You are not required to retain your own counsel, but if you choose to do so, such counsel must file a notice of appearance on your behalf.

55. If you wish to object to the Settlement or any of its terms, the proposed Plan of Allocation, or Lead Counsel's application for attorneys' fees and litigation expenses, and if you did not exclude yourself from the Class, you may present your objections by following the instructions in the section entitled, "When And Where Will The Court Decide Whether To Approve The Settlement?" below. If you excluded yourself from the Class, you are not entitled to submit an objection.

**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 DO NOT LIKE THE SETTLEMENT?**

56. If you do not wish to object in person to the proposed Settlement, the proposed Plan of Allocation, and/or the application for attorneys' fees and litigation expenses, you do not need to attend the Settlement Hearing. You can object to or participate in the Settlement without attending the Settlement Hearing.

57. The Settlement Hearing will be held on August 17, 2023, at 10:00 a.m., before the Honorable James Donato, at the United States District Court, Northern District of California, Phillip Burton Federal Building & United States Courthouse, Courtroom 11 – 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102. The Court reserves the right to approve the Settlement or the Plan of Allocation, Lead Counsel's motion for an award of attorneys' fees and expenses, and/or any other matter related to the Settlement at or after the Settlement Hearing without further notice to the members of the Class.

58. Any Class Member who did not request exclusion such that it was received no later than January 26, 2023, may object to the Settlement, the Plan of Allocation, or Lead Counsel's request for an award of attorneys' fees and litigation expenses.¹¹ 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, no settlement payments will be sent out and the lawsuit will continue. If that is what you want to happen, you must object.

59. Any objection to the proposed Settlement must be in writing. If you file 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: (i) clearly identify the case name and number (*Purple Mountain Tr. v. Wells Fargo & Co., et al.*, No. 3:18-cv-03948-JD (N.D. Cal.)); (ii) be submitted to the Court either by mailing them to the Clerk of the Court, United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, or by filing them in person at any location of the United States District Court for the Northern District of California; and (iii) be filed or postmarked on or before July 27, 2023.

¹¹ Lead Plaintiff's initial motion papers in support of these matters will be filed with the Court on or before July 13, 2023.

60. The notice of objection must include documentation establishing the objecting Person's membership in the Class, including the number of shares of Wells Fargo common stock that the objecting Person: (i) owned as of the opening of trading on November 3, 2016; and (ii) purchased, acquired and/or sold during the Class Period, as well as the dates and prices for each such purchase, acquisition and sale, and contain a statement of reasons for the objection, copies of any papers, briefs, or other documents upon which the objection is based, a statement of whether the objector intends to appear at the Settlement Hearing, and the objector's signature, even if represented by counsel. The objection must state whether it applies only to the objector, to a specific subset of the Class, or to the entire Class. In addition, the objector must identify all class action settlements to which the objector and his, her, or its counsel have previously objected. Documentation establishing membership in the Class must consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from the objector's broker containing the transactional and holding information found in a broker confirmation slip or account statement. Objectors who desire to present evidence at the Settlement Hearing in support of their objection must include in their written objection or notice of appearance the identity of any witnesses they may call to testify and any exhibits they intend to introduce into evidence at the hearing.

61. You may not object to the Settlement or any aspect of it, if you excluded yourself from the Class.

62. You may file a written objection without having to appear at the Settlement Hearing. You may not appear at the Settlement Hearing to present your objection, however, unless you have first filed a written objection in accordance with the procedures described above, unless the Court orders otherwise.

63. You are not required to hire an attorney to represent you in making written objections or in appearing at the Settlement Hearing. If you decide to hire an attorney, which will be at your own expense, however, he or she must file a notice of appearance with the Court by July 27, 2023.

64. The Settlement Hearing may be adjourned by the Court without further written notice to the Class, other than a posting of the adjournment on the Settlement website, www.WellsFargo2018SecuritiesLitigation.com. If you plan to attend the Settlement Hearing, you should confirm the date and time with Lead Counsel.

Unless the Court orders otherwise, any 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 an award of attorneys' fees and litigation expenses. Class Members do not need to appear at the hearing or take any other action to indicate their approval.

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

65. Nominees who purchased or acquired Wells Fargo common stock for beneficial owners who are Class Members are directed to: (i) request within seven (7) calendar days of receipt of the Postcard Notice sufficient copies of the Postcard Notice from the Claims Administrator to forward to all such beneficial owners; or (ii) send a list of the names and addresses (including email addresses if available) of such beneficial owners to the Claims Administrator within seven (7) calendar days after receipt of the Postcard Notice, at notifications@gilardi.com or *Wells Fargo 2018 Securities Litigation*, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040. If a nominee elects to send the Postcard Notice to beneficial owners, such nominee is directed to email or mail via First Class Mail (where an email is unavailable) the Postcard Notice within seven (7) calendar days of receipt of those documents from the Claims Administrator, and upon such emailing or mailing, the nominee shall send a statement to the Claims Administrator confirming that the emailing or mailing was made as directed, and the nominee shall retain the list of names and addresses for use in connection with any possible future notice to the Class. Upon full compliance with these instructions, including the timely emailing or mailing of the Postcard Notice to beneficial owners, such nominees may seek reimbursement of their reasonable expenses actually incurred in complying with these instructions by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought and reflecting compliance with these instructions, including timely emailing or mailing of the Postcard Notice, if the nominee elected or elects to do so. Such properly documented expenses incurred by nominees in compliance with the terms of these instructions will be paid from the Settlement Fund. Copies of this Notice may also be obtained by calling toll-free 1-888-416-6687, and may be downloaded from the Settlement website, www.WellsFargo2018SecuritiesLitigation.com.

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

66. This Notice contains only a summary of the terms of the proposed Settlement. More detailed information about the matters involved in the Action is available at www.WellsFargo2018SecuritiesLitigation.com, including, among other documents, copies of the Stipulation and Proof of Claim Form. This Notice summarizes the proposed Settlement. For the precise terms and conditions of the Settlement, please see the settlement agreement available at www.WellsFargo2018SecuritiesLitigation.com, or by contacting Lead Counsel below. You may also access the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, 450 Golden Gate Avenue, San Francisco, CA 94102, between 9:00 a.m. and 1:00 p.m., Monday through Friday, excluding Court holidays. All inquiries concerning this Notice or the Claim Form should be directed to:

Wells Fargo 2018 Securities Litigation
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040

-or-

Scott H. Saham, Esq.
ROBBINS GELLER RUDMAN & DOWD LLP
655 W. Broadway, Suite 1900
San Diego, CA 92101
1-800-449-4900
settlementinfo@rgrdlaw.com
Lead Counsel

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

Dated: May 1, 2023

By Order of the Court
United States District Court
Northern District of California

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

PURPLE MOUNTAIN TRUST, Individually and on)	
Behalf of All Others Similarly Situated,)	
) Case No. 3:18-cv-03948-JD
Plaintiff,)	
) <u>CLASS ACTION</u>
vs.)	
) PROOF OF CLAIM FORM
WELLS FARGO & COMPANY, et al.,)	
)
Defendants.)	
_____)	

Wells Fargo 2018 Securities Litigation
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040

Toll-Free Number: 1-888-416-6687

Email: info@WellsFargo2018SecuritiesLitigation.com

Website: www.WellsFargo2018SecuritiesLitigation.com

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 Form ("Claim Form") and mail it by first-class mail to the address below, **postmarked no later than August 21, 2023, or submit it online at the website below on or before August 21, 2023.**

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.

I. INSTRUCTION

A. GENERAL INSTRUCTIONS

1. To recover as a member of the Class based on your claims in the action entitled *Purple Mountain Tr. v. Wells Fargo & Co., et al.*, No. 3:18-cv-03948-JD (N.D. Cal.) (the "Action"), you must complete and, on page 8 hereof, sign this Proof of Claim Form ("Claim Form"). If you fail to file a properly addressed (as set forth in paragraph 3 below) Claim Form, your claim may be rejected, and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed Settlement of the Action.

2. Submission of this Claim Form, however, does not assure that you will share in the proceeds of settlement in the Action.

3. **YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED CLAIM FORM ON OR BEFORE AUGUST 21, 2023, ADDRESSED AS FOLLOWS:**

Wells Fargo 2018 Securities Litigation
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040
www.WellsFargo2018SecuritiesLitigation.com

If you are NOT a member of the Class, as defined below and in the Notice of Proposed Settlement of Class Action (the "Notice"), DO NOT submit a Claim Form.

4. If you are a member of the Class and you did not timely and validly request exclusion from the Class, you are bound by the terms of any judgment entered in the Action, including the releases provided therein, **WHETHER OR NOT YOU SUBMIT A CLAIM FORM.**

5. It is important that you completely read and understand the Notice that accompanies this Claim Form, including the Plan of Allocation of the Net Settlement Fund set forth in the Notice. The Notice describes the proposed Settlement, how 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.

B. CLAIMANT IDENTIFICATION

1. If you purchased or acquired Wells Fargo common stock and held the certificate(s) in your name, you are the beneficial purchaser or acquirer as well as the record purchaser or acquirer. If, however, the certificate(s) were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial purchaser and the third party is the record purchaser.

2. Use Part I of this form entitled "Claimant Identification" to identify the beneficial owner(s) of Wells Fargo common stock. The complete name(s) of the beneficial owner(s) must be entered. If you held the eligible Wells Fargo common stock in your own name, you are the beneficial owner as well as the record owner. If, however, your shares of eligible Wells Fargo common stock were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial owner of these shares, but the third party is the record owner. **THIS CLAIM MUST BE FILED AND SIGNED BY THE ACTUAL BENEFICIAL PURCHASER(S) OR ACQUIRER(S) OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER(S) OR ACQUIRER(S) OF THE WELLS FARGO COMMON STOCK UPON WHICH THIS CLAIM IS BASED.**

3. All joint purchasers must sign this Claim Form and be identified in Part I. The Social Security (or taxpayer identification) number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

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

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

- (a) expressly state the capacity in which they are acting;
- (b) identify the name, account number, Social Security Number (or taxpayer identification number), address, and telephone number of the beneficial owner of (or other person or entity on whose behalf they are acting with respect to) the Wells Fargo 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.)

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

- (a) own or owned the Wells Fargo common stock you have listed in the Claim Form; or
- (b) are expressly authorized to act on behalf of the owner thereof.

C. CLAIM FORM

1. Use Part II of this form entitled "Schedule of Transactions in Wells Fargo Common Stock" to supply all required details of your transaction(s) in Wells Fargo common stock. If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

2. On the schedules, provide all of the requested information with respect to all of your purchases and acquisitions and all of your sales of Wells Fargo common stock that took place at any time on or from and including November 3, 2016 through November 1, 2017, whether such transactions resulted in a profit or a loss. Failure to report all such transactions may result in the rejection of your claim. Also, list the number of shares of Wells Fargo common stock held at the close of trading on November 2, 2016, August 3, 2017, and November 1, 2017.

3. List each transaction in the Class Period separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

4. You are required to submit genuine and sufficient documentation for all of your transactions in and holdings of Wells Fargo common stock set forth in the Claim Form. Documentation may consist of copies of brokerage confirmation slips or monthly brokerage account statements, or an authorized statement from your broker containing the transactional and holding information found in a broker confirmation slip or account statement. The parties and the Claims Administrator do not independently have information about your investments in Wells Fargo 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.**

5. The above requests are designed to provide the minimum amount of information necessary to process the simplest claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate your losses. In the event the Claims Administrator cannot perform the calculation accurately or at a reasonable cost to the Class with the information provided, the Claims Administrator may condition acceptance of the claim upon the production of additional information and/or the claimant's responsibility for any increased costs due to the nature and/or scope of the claim.

6. 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.

7. **PLEASE NOTE:** As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her or its *pro rata* share of the Net Settlement Fund. If the prorated payment to any claimant calculates to less than \$10.00, no payment shall be made to that claimant.

8. If you have questions concerning the Claim Form, or need additional copies of the Claim Form or the Notice, you may contact the Claims Administrator, Gilardi & Co. LLC, at the address on the first page of the Claim Form, by email at info@WellsFargo2018SecuritiesLitigation.com, or by toll-free phone at 1-888-416-6687, or you can visit the website, www.WellsFargo2018SecuritiesLitigation.com, where copies of the Claim Form and Notice are available for downloading.

9. 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 email the Claims Administrator's electronic filing department at edata@gilardi.com. **Any file not in accordance with the required electronic filing format will be subject to rejection.** Only one claim should be submitted for each separate legal entity (see ¶B.4 above) and the **complete** name of the beneficial owner(s) of the securities must be entered where called for (see ¶B.2 above). Distribution payments must be made by check or electronic payment payable to the Authorized Claimant (beneficial account owner). The Third Party Filer shall not be the payee of any distribution payment check or electronic distribution payment. No electronic files will be considered to have been submitted unless the Claims Administrator issues an email 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 electronic filing department at edata@gilardi.com to inquire about your file and confirm it was received.**

Official Office Use Only

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Purple Mountain Trust v.
Wells Fargo & Company, et al.

No. 3:18-cv-03948-JD

PROOF OF CLAIM FORM

Must Be Postmarked (if Mailed)
or Received (if Submitted Online)
No Later Than August 21, 2023

WEF2

Please Type or Print in the Boxes Below
Do NOT use Red Ink, Pencil, or Staples

PART II. CLAIMANT IDENTIFICATION

Last Name M.I. First Name

Last Name (Co-Beneficial Owner) M.I. First Name (Co-Beneficial Owner)

IRA Joint Tenancy Employee Individual Other

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA (specify)

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Last Four Digits of Social Security Number Taxpayer Identification Number

Telephone Number (Primary Daytime) Telephone Number (Alternate)

Email Address

MAILING INFORMATION

Address

Address (cont.)

City State ZIP Code

Foreign Province Foreign Postal Code Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY OB CB ATP BE FL OP KE DR ME RE ICI EM ND SH MM/DD/YYYY FOR CLAIMS PROCESSING ONLY



PART III. SCHEDULE OF TRANSACTIONS IN WELLS FARGO COMMON STOCK

Please be sure to include proper documentation with your Claim Form as described in ¶C.4 of the Instructions. Do not include information regarding securities other than Wells Fargo common stock.

A. Number of shares of Wells Fargo common stock held at the close of trading on November 2, 2016. (Must be documented.) If none, write "zero": Proof Enclosed? Y N

B. Purchases or acquisitions of Wells Fargo common stock (November 3, 2016 - November 1, 2017, inclusive) (Must be documented.):

PURCHASES											
Trade Date(s) (List Chronologically)								Number of Shares Purchased or Acquired	Total Purchase or Acquisition Price (Excluding commissions, taxes and fees)	Proof of Purchase Enclosed?	
M	M	D	D	Y	Y	Y	Y				
1.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
2.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
3.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
4.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
5.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N

IMPORTANT: (i) If any purchase listed covered a "short sale," please mark Yes: Yes

(ii) If you received shares through an acquisition or merger, please identify the date, the share amount and the company acquired:

M M D D Y Y Y Y Merger Shares: Company:

/ /

C. Sales of Wells Fargo common stock (November 3, 2016-November 1, 2017, inclusive) (Must be documented.):

SALES											
Trade Date(s) (List Chronologically)								Number of Shares Sold	Total Sales Price (Excluding commissions, taxes and fees)	Proof of Sales Enclosed?	
M	M	D	D	Y	Y	Y	Y				
1.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
2.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
3.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
4.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N
5.			/		/			\$		00	<input type="radio"/> Y <input type="radio"/> N

D. Number of shares of Wells Fargo common stock held at the close of trading on August 3, 2017. (Must be documented.) If none, write "zero": Proof Enclosed? Y N

E. Number of shares of Wells Fargo common stock held at the close of trading on November 1, 2017. (Must be documented.) If none, write "zero": Proof Enclosed? Y N

If you require additional space, attach extra schedules in the same format as above.
Sign and print your name on each additional page.

YOU MUST READ AND SIGN THE RELEASE ON PAGE 8. FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.



IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

I (We) submit this Claim Form under the terms of the Stipulation of Settlement dated February 6, 2023 ("Stipulation") described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the Northern District of California with respect to my (our) claim as a Class Member (as defined in the Notice) and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Action. I (We) agree to furnish additional information to Lead Counsel and/or the Claims Administrator to support this claim if required to do so. I (We) have not submitted any other claim covering the same purchases, acquisitions, or sales of Wells Fargo common stock during the Class Period and know of no other Person having done so on my (our) behalf.

V. RELEASE

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally and forever settle, release, relinquish and discharge all of the Released Claims (including Unknown Claims) against each and all of the Released Defendant Parties, all as defined herein and in the Notice and Stipulation.

2. This release shall be of no force or effect unless and until the Court approves the Stipulation and it becomes effective on the Effective Date.

3. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof and have not submitted any other claim covering the same purchases of Wells Fargo common stock and know of no other person having done so on my (our) behalf.

4. I (We) hereby warrant and represent that I (we) have included all requested information about all of my (our) purchases or acquisitions of Wells Fargo common stock during the Class Period, as well as the number of shares held at the close of trading on November 2, 2016, August 3, 2017, and November 1, 2017.

5. The number(s) shown on this form is (are) the correct SSN/TIN(s).

6. I (We) waive the right to trial by jury, to the extent it exists, and agree to the determination by the Court of the validity or amount of this claim, and waive any right of appeal or review with respect to such determination.

7. I (We) certify that I am (we are) NOT subject to backup withholding under the provisions of §3406(a)(1)(C) of the Internal Revenue Code.

(NOTE: If you have been notified by the Internal Revenue Service that you are subject to backup withholding, you must cross out Item 7 above.)

I (We) declare under penalty of perjury under the laws of the United States of America that the foregoing information supplied by the undersigned is true and correct.



Executed this _____ day of _____ in _____
(Month/Year) (City/State/Country)

(Sign your name here)

(Sign your name here)

(Type or print your name here)

(Type or print your name here)

(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)

(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.**

Reminder Checklist:

- 1. Please sign the above release and acknowledgment.
- 2. Remember to attach copies of supporting documentation, if available.
- 3. Do not send original stock certificates. Attach only **copies** of acceptable supporting documentation as these documents will not be returned to you.
- 4. Keep a copy of your Claim Form and all supporting documentation for your records.
- 5. If you move, please send us your new address.
- 6. If you have any questions or concerns regarding your claim, contact the Claims Administrator at *Wells Fargo 2018 Securities Litigation*, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040. You can also contact the Claims Administrator by email at info@WellsFargo2018SecuritiesLitigation.com, or by toll-free phone at 1-888-416-6687, or you may visit www.WellsFargo2018SecuritiesLitigation.com. **DO NOT** call Wells Fargo, the other Defendants, or their counsel with questions regarding your claim.

**THIS PROOF OF CLAIM MUST BE SUBMITTED ONLINE OR MAILED
NO LATER THAN AUGUST 21, 2023, ADDRESSED AS FOLLOWS:**

Wells Fargo 2018 Securities Litigation
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040
www.WellsFargo2018SecuritiesLitigation.com



EXHIBIT C



1 McInnis Parkway
Suite 250
San Rafael, CA 94903
P: (415) 458-3015

May 19, 2023

«FirstName» «LastName»
«Company»
«Addr1»
«Addr2»
South Bend, IN 46601
«FCountry»

Re: **Wells Fargo 2018 Securities Litigation**

Dear «GENDER» «LastName»:

Please find enclosed the Summary Notice for the above referenced litigation. Please note both the class period and the designated eligible securities, specifically the inclusion of all persons who purchased or acquired the common stock of Wells Fargo & Company ("Wells Fargo") from November 3, 2016 through August 3, 2017, inclusive (the "Class Period"). In addition, **the Notice provides that the Claim Filing Deadline is August 21, 2023.**

If you provided a data file of names and addresses for mailing in connection with the previous Notice of Pendency of Class Action sent in November 2022, you should not provide those names and addresses again as we have already mailed the Notice to those beneficial owners. Please only provide new names and addresses for your clients who may be members of the Class.

Please pay particular attention to "What If I Bought Shares On Someone Else's Behalf?" on page eleven of the Notice which states, in part: Nominees who purchased or acquired Wells Fargo common stock for beneficial owners who are Class Members are directed to: (i) request within seven (7) calendar days of receipt of the Postcard Notice sufficient copies of the Postcard Notice from the Claims Administrator to forward to all such beneficial owners; or (ii) send a list of the names and addresses (including email addresses if available) of such beneficial owners to the Claims Administrator within seven (7) calendar days after receipt of the Postcard Notice, at notifications@gilardi.com or Wells Fargo 2018 Securities Litigation, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040. If a nominee elects to send the Postcard Notice to beneficial owners, such nominee is directed to email or mail via First Class Mail (where an email is unavailable) the Postcard Notice within seven (7) calendar days of receipt of those documents from the Claims Administrator, and upon such emailing or mailing, the nominee shall send a statement to the Claims Administrator confirming that the emailing or mailing was made as directed, and the nominee shall retain the list of names and addresses for use in connection with any possible future notice to the Class.

Please do not make your own copies of the Proof of Claim Form, as copies may not be accepted for processing. Additional copies of the appropriate documents may be requested by contacting us at the above address and/or phone number. If we conduct the necessary mailing on your behalf, please submit names and addresses either via email to Notifications@Gilardi.com, via CD Rom to the above address or contact us to obtain secure FTP transmission instructions. Mailing labels will be accepted, but you may be requested to provide an additional copy of the address information you send. Do not include any confidential information that should not appear on a mailing label.

The data provided must be in one of the following formats:

- ASCII Fixed Length file
- ASCII Tab Delimited file
- Microsoft Excel spreadsheet

Your request must also specify the case name and Control Total(s) (for example, the total number of name and address records provided) for each file submission. If you have any questions, please email Notifications@Gilardi.com.

Sincerely,

Gilardi and Company, LLC

EXHIBIT D

TECHNOLOGY

TikTok Tests Its Own AI Chatbot

By SARAH E. NEEDLEMAN

TikTok is testing a chatbot powered by generative artificial intelligence that is designed to help its users find content and get recommendations for more.

The company said Thursday it has been testing the feature in the Philippines and its bot is called Tako.

"Tako is powered by a third-party chat assistant and is designed to help make it easier to discover entertaining and inspiring content on TikTok," it said on Twitter. "No current plans for this beyond these early tests."

The bot will answer questions and have conversations with users, said Watchful Technologies, a Tel Aviv-based competitive-intelligence company that uncovered that TikTok was trying the feature before its announcement.

Generative AI chatbots have been making their way into many apps in recent months, including Duolingo, Expedia and Bing. In February, Facebook parent Meta Platforms said it was establishing a group aimed at accelerating the adoption of the technology across the company. Snap said it was rolling out an AI experimental chatbot for users on its Snapchat app.

The technology can be helpful for users navigating their way around apps filled with vast amounts of content. For app makers, it serves as a potential engagement booster.

"Tako could completely transform the way users navigate TikTok," Watchful said in a blog post Thursday, adding that the chatbot's placement on the top right corner of the app, above other icons, signifies its importance.

The generative AI boom was triggered by the release of OpenAI's ChatGPT tool late last year. It started a wave of similar systems capable of quickly producing essays, images, audio and more based on text prompts. Tech experts expect it to transform industries and the future of work.

Watchful said it wasn't able to determine which generative

AI tool TikTok is using to power Tako, or if Tako's recommendations are controlled by its algorithm. The company said Tako is initially rolling out only for users who are 18 and older.

The new feature is being tested as TikTok faces the possibility of being banned in the U.S. unless its Chinese owner ByteDance sells its stakes in the video-sharing app.

U.S. lawmakers have raised national-security concerns over how ByteDance handles TikTok's data-gathering and content moderation. The company has made efforts to be more transparent about its processes, such as by building a new subsidiary to house TikTok's U.S. data.

Last week, Montana's governor signed a bill banning TikTok in the state, citing national security concerns. TikTok is suing the state over the bill, which it has criticized as unconstitutional.

Consumer-advocacy groups raised concerns about TikTok's recommendation algorithm, saying it suggests inappropriate and harmful content. In 2021, a Wall Street Journal investigation found TikTok's algorithms flooded teens with thousands of weight-loss videos within a few weeks of joining the platform.

In response, TikTok said it would adjust its recommendation algorithm to avoid showing users too much of the same content and that it was testing ways to avoid pushing too much content around a certain topic to individual users—such as extreme dieting or breakups—to protect their mental well-being.

Still, this month, the Journal reported TikTok is continuing to inundate some users with videos about eating disorders, body image, self-harm and suicide based on a recent study.

A TikTok spokeswoman said the company has a team of more than 40,000 people moderating content, and it removed about 85 million posts deemed in violation of its community guidelines in the last three months of 2022.



Some chief information security officers see generative AI's potential but are unconvinced that in its current form it does anything new.

Security Chiefs: Rewards, Risks Of Generative IT Are Inflated

By JAMES RUNDLE

Security chiefs say the benefits of artificial intelligence are clear, but the promises and risks of early generative AI are overblown.

Generative AI platforms such as OpenAI's ChatGPT gained attention for their ability to answer conversational questions, write essays and perform other tasks in humanlike ways.

Security vendors are touting the benefits of the technology, saying it can augment human analysts by analyzing and distilling data from wildly different sources into a digestible report. Google released a security-focused generative AI product in April, joining cyber technology providers including SecurityScorecard and ZeroFox.

Some chief information security officers see the technology's potential but are unconvinced that in its current form it does anything new. Machine-learning technology has been in place for years in areas such as market surveillance units of stock exchanges, performing similar data-analysis functions, and in

cybersecurity teams at large companies such as Walmart.

"At present, we're basically looking at every result and trying to understand if we can trust not just the work that went into the result, in terms of the sources that it was trained from, but then the result itself," said Justin Shattuck, CISO at insurer Resilience.

Generative AI systems have been known to give inaccurate or misleading results, sometimes from prompts that are too vague but also from poor data sources. The limitations of the technology mean it can run into trouble on relatively simple queries.

Shattuck said his team experimented with generative AI to analyze the security information generated by its systems. AI can identify data points of interest that may be missed by human analysts reading reams of alerts. "We found that we can trust it for that type of workload," he said.

Government officials say they are still assessing the impact that AI variants such as genera-

tive apps could have in the future before they issue recommendations. John Katko, a former congressman for New York's 24th district, and the ranking member of the House Homeland Security Committee until earlier this year, said the true potential of the technology has yet to be realized, given the speed of development.

"Where is AI going to be in six months, and how is that going to change things? Look at how much it has changed in the last three months," he said, referring to its widespread adoption by software providers.

For Lucia Milica Stacy, global resident CISO at cybersecurity firm Proofpoint, the speed of development and public fascination with the technology have led to the rash of generative AI deployments by technology providers. Sometimes this stems from a commercial imperative but also from worries that if they don't use it, hackers will, she said. "Our job as security leaders is to manage that risk, and every time there's new tech, there's a new opportunity for that threat actor to leverage

that to get into my environment," said Milica Stacy.

There is little doubt that generative AI is a boon to phishing attackers, who can otherwise be tripped up by poorly worded scam emails. ChatGPT can write grammatically correct copy for them. Cybersecurity company Darktrace said in an April report it observed a 135% rise in spam emails to clients between January and February with markedly improved English-language grammar and syntax.

Companies including Samsung Electronics, Apple, JPMorgan Chase and Verizon Communications barred or restricted employee use of ChatGPT and similar programs. The measures were introduced over fears employees might paste sensitive information into these tools, which could then leak or send trade secrets back to the AI model to be trained on.

Concerns should be manageable through existing data-protection procedures and a few new controls, said Supro Ghose, CISO at Eagle Bancorp, a regional bank in Virginia, Washington, D.C., and Maryland.

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CLASS ACTION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

PURPLE MOUNTAIN TRUST, Individually and on Behalf of All Others Similarly Situated, Plaintiff, vs. WELLS FARGO & COMPANY, et al., Defendants.

IF YOU PURCHASED OR ACQUIRED WELLS FARGO & COMPANY ("WELLS FARGO") COMMON STOCK FROM NOVEMBER 3, 2016 THROUGH AUGUST 3, 2017, INCLUSIVE (THE "CLASS PERIOD"), YOU COULD RECEIVE A PAYMENT FROM A CLASS ACTION SETTLEMENT. CERTAIN PERSONS ARE EXCLUDED FROM THE DEFINITION OF THE CLASS AS SET FORTH IN THE STIPULATION OF SETTLEMENT.

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY 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, that in the above-captioned litigation (the "Action"), a Settlement has been proposed for \$300,000,000.00 in cash. A hearing will be held on August 17, 2023, at 10:00 a.m., before the Honorable James Donato, at the United States District Court, Northern District of California, Phillip Burton Federal Building & United States Courthouse, Courtroom 11 - 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, for the purpose of determining whether: (i) the proposed Settlement should be approved by the Court as fair, reasonable and adequate; (ii) the proposed Plan of Allocation for distribution of the Settlement proceeds is fair, reasonable and adequate and therefore should be approved; and (iii) the application of Lead Counsel for the payment of attorneys' fees and expenses from the Settlement Fund, including interest earned thereon, should be granted.

IF YOU ARE A MEMBER OF THE CLASS DESCRIBED ABOVE, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THE LITIGATION, AND YOU MAY BE ENTITLED TO SHARE IN THE SETTLEMENT FUND. You may obtain a copy of the Stipulation of Settlement, the Notice of Proposed Settlement of Class Action (the "Notice"), and the Proof of Claim Form at www.WellsFargo2018SecuritiesLitigation.com or by contacting the Claims Administrator: Wells Fargo 2018 Securities Litigation, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040; 1-888-416-6687.

If you are a Class Member, to be eligible to share in the distribution of the Net Settlement Fund, you must submit a Proof of Claim by mail postmarked no later than August 21, 2023, or submit it online by that date. If you are a Class Member and do not submit a valid Proof of Claim, you will not be eligible to share in the distribution of the Net Settlement Fund, but you will still be bound by any judgment entered by the Court in this Action (including the releases provided for therein).

To exclude yourself from the Class, you must have mailed a written request for exclusion so that it was received by January 26, 2023, in accordance with the instructions set forth in the notice of class certification disseminated pursuant to Court order. If you are a Class Member and have not excluded yourself from the Class, you will be bound by any judgment entered by the Court in this Action (including the releases provided for therein) whether or not you submit a Proof of Claim. If you submitted a valid request for exclusion, you will have no right to recover money pursuant to the Settlement.

Any objection to the proposed Settlement, the Plan of Allocation, or the fee and expense application must be filed with the Court no later than July 27, 2023.

PLEASE DO NOT CONTACT THE COURT, THE CLERK'S OFFICE, DEFENDANTS, OR DEFENDANTS' COUNSEL REGARDING THIS NOTICE. If you have any questions about the Settlement, or your eligibility to participate in the Settlement, you may contact Lead Counsel at the following address or by calling 1-800-449-4900:

ROBBINS GELLER RUDMAN & DOWD LLP SCOTT H. SAHAM, ESQ. 655 West Broadway, Suite 1900 San Diego, CA 92101 settlementinfo@rgrdlaw.com

DATED: May 11, 2023

BY ORDER OF THE COURT UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

NOTICE OF SALE

NOTIFICATION OF PUBLIC SALE OF COLLATERAL BY SECURED CREDITOR PURSUANT TO UNIFORM COMMERCIAL CODE

CASE-MATE INC. ("Seller"), in its capacity as a secured creditor, intends to sell, assign and transfer the rights, title and interest of VINCI BRANDS LLC, f/k/a Armor Acquisition LLC ("Company"), a Delaware limited liability company in the property identified below to the highest or best qualified bidder(s), as determined by Seller, by a public sale or sales as follows:

Day and Date: Monday, June 5, 2023 Time: 1:00 p.m. (prevailing Eastern time) Place: Nelson Mullins Riley & Scarborough LLP 330 Madison Avenue, 27th Floor New York, New York 10017 (video teleconference available)

Collateral: All assets of the Company, including accounts, inventory, goods, equipment, investment property, deposit accounts, general intangibles, trademarks, trademarks, licenses, goodwill, contract rights, customer lists, and all books and records, other than Excluded Property (collectively, the "Collateral").

Excluded Property: (i) Equipment or other property subject to a capital lease or purchase money financing, to the extent Seller does not have a lien thereon; and (ii) any United States intent-to-use trademark applications (the "Excluded Property").

Seller holds a security interest in the Collateral pursuant to the provisions of the Uniform Commercial Code of the State of Delaware (the "UCC") and Company's rights in the Collateral will be sold in accordance with the provisions of the UCC under such procedures and rules as Seller may determine. Seller reserves the right to modify such procedures at any time in its discretion.

The public sale will be conducted on an "AS IS, WHERE IS" basis, without representation or warranty of any kind from Seller as to title, quality, quantity, quiet enjoyment, merchantability, fitness for a particular purpose, or any other matter. Bids may be in bulk only (unless Seller elects otherwise). Any bidder must be prepared to accept the terms and conditions set forth in a certain Asset Sale Agreement to be provided upon request (the "Proposed Sale Agreement"). All bidders must be pre-qualified on or before 5:00 p.m. prevailing Eastern time on June 2, 2023 to participate in the auction and for such purpose shall provide Seller with, among other information, financial information and other documents necessary to demonstrate its ability to close the transaction within the time frame set forth below and with information to satisfy the requirements of Seller as to AML and OFAC regulations. No bids shall be subject to any further due diligence or financing contingencies. Among other conditions, in order for a bidder to be pre-qualified, each bidder must enter into a customary confidentiality agreement and post with Seller a good faith deposit in an amount equal to the greater of (a) \$1,200,000 and (b) ten percent (10%) of its bid, in cash, by an irrevocable letter of credit, or cashier's or bank check, or by wire transfer of immediately available funds, which will be refundable if the bidder is not the successful bidder; provided that Seller may accept other assurances as to the creditworthiness of the bidder in its sole discretion. Unless otherwise agreed to by Seller, closing of the sale will occur on June 5, 2023, and payment of the entire balance of the purchase price will be due and payable to Seller on such date by cashier's or bank check or wire transfer of immediately available funds. Seller reserves the right to credit bid in such amount as may determine in its sole and absolute discretion.

This notification does not constitute a binding offer by Seller to sell the Collateral. Seller reserves the right to adjourn, postpone or cancel the sale for any reason it may determine. Inquiries concerning the sale, including any requests for the Proposed Sale Agreement and financial information as to Company and other terms of sale, may be made to Adam Herring at (404) 322-6143 or adam.herring@nelsonmullins.com. On a confidential basis only, any bidder that has been qualified shall be entitled to receive a copy of the Proposed Sale Agreement prior to the date of the auction sale.

If you plan to attend the sale, please contact Adam Herring at Nelson Mullins, (404) 322-6143 or adam.herring@nelsonmullins.com in advance so that we can alert building security or provide video teleconference information.

Illumina Shareholders Elect One of Icahn's Nominees to the Board

By PETER LOFTUS

Illumina shareholders voted to elect one of activist investor Carl Icahn's three nominees to the company's board, giving him a partial victory in a bruising proxy battle he launched over the biotechnology company's handling of a risky acquisition.

According to a preliminary vote tally disclosed at Illumina's annual shareholder meeting on Thursday, shareholders re-elected eight existing Illumina directors and elected Icahn nominee Andrew Teno, a portfolio manager at Icahn Capital.

Illumina Chairman John Thompson wasn't re-elected, Illumina said. Chief Executive Francis deSouza, who serves on the board, was re-elected. The board will choose a new chairman at a later date. Shareholders declined to approve the compensation provided to deSouza and Illumina's other top executives. That advisory vote is nonbinding.

Illumina, which had backed the election of its current nine directors including deSouza, said it appreciated the constructive shareholder feedback and would welcome Teno to the board.

San Diego-based Illumina is a leader in DNA sequencing technology used by academic researchers, drugmakers and consumer genomics companies like 23andMe.

Much of Icahn's criticisms of Illumina's management stemmed from the company's \$7 billion acquisition of Grail, a leader in the emerging market for blood tests that can detect cancer early. In 2020, Illumina, which had owned Grail but spun out most of it in 2017, agreed to acquire the stake in Grail that it didn't own for more than \$7 billion. Antitrust regulators in Europe and the

U.S. opposed the deal, saying it would hurt competition. But Illumina completed the acquisition in 2021, saying it would operate Grail as a separate division until antitrust proceedings were resolved.

The Federal Trade Commission ruled in April that Illumina must divest itself of Grail because it supplies the DNA sequencing equipment used to run the cancer-detection tests. The FTC said Illumina could take steps to disadvantage Grail's rivals by raising costs or withholding products from them.

The European Union ruled against the deal and is expected in coming weeks or months to issue a divestment order and a fine against Illumina for closing the acquisition while EU regulators were still reviewing it.

Illumina appealed the antitrust losses, arguing it will ensure Grail competitors have sufficient access to its products, and Illumina's ownership of Grail will improve global access to Grail's tests and save lives. Illumina has also begun to prepare for divestment in the event its appeals are unsuccessful.

Since the closing of the Grail deal, Illumina shares have plunged by more than 60%, trading recently around \$195. Investors and analysts are concerned Illumina can't win the antitrust battle, and that ownership of Grail is hurting profits.

Icahn, steeped in proxy battles against many companies over the years, criticized Illumina's pursuit of Grail, and argued his nominees were needed to pursue more shareholder-friendly measures. He suggested Illumina's former CEO should come back and replace deSouza.

Icahn Enterprises plunges after Twitter post..... B11

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Declaration of Publication

I, Carla Peak, as Vice President, Legal Notification Services at Gilardi & Co. LLC, a KCC Class Action Services Company in San Rafael, California, hereby certify that I caused the attached notice to be printed in said publication on May 26, 2023:

Name of Publication: The Wall Street Journal

Address: 1211 Avenue of the Americas

City, State, Zip: New York, NY 10036

Phone #: 1-800-568-7625

State of: New York

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 26th day of May 2023, at Sellersville, Pennsylvania.

A handwritten signature in black ink that reads "Carla Peak". The signature is written in a cursive, flowing style.

Carla Peak



Robbins Geller Rudman & Dowd LLP Announces Proposed Settlement in the Wells Fargo 2018 Securities Litigation

May 26, 2023 08:00 AM Eastern Daylight Time

SAN DIEGO--(BUSINESS WIRE)--The following statement is being issued by Robbins Geller Rudman & Dowd LLP regarding the Wells Fargo 2018 Securities Litigation:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PURPLE MOUNTAIN TRUST, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

vs.

WELLS FARGO & COMPANY, et al.,

Defendants.

Case No. 3:18-cv-03948-JD

CLASS ACTION

SUMMARY NOTICE

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PLEASE DO NOT CONTACT THE COURT, THE CLERK'S OFFICE, DEFENDANTS, OR DEFENDANTS' COUNSEL REGARDING THIS NOTICE. If you have any questions about the Settlement, or your eligibility to participate in the Settlement, you may contact Lead Counsel at the following address or by calling 1-800-449-4900:

ROBBINS GELLER RUDMAN
& DOWD LLP
SCOTT H. SAHAM, ESQ.
655 West Broadway, Suite 1900
San Diego, CA 92101
settlementinfo@rgrdlaw.com

DATED: May 1, 2023

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Contacts

Media Contact:

Robbins Geller Rudman & Dowd LLP

Shareholder Relations Department

Greg Wood

(619) 231-1058

Declaration of Publication

I, Carla Peak, as Vice President, Legal Notification Services at Gilardi & Co. LLC, a KCC Class Action Services Company in San Rafael, California, hereby certify that I caused the attached notice to be published as a press release by the following wire service:

Name of Publication: BusinessWire

Address: 101 California Street 20th Floor

City, ST Zip: San Francisco, CA 94111

Phone #: 415-986-4422

State of: California

The press release was distributed on May 26, 2023 to the following media circuits offered by the above-referenced wire service:

1. National Newslite

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 26th day of May 2023, at Sellersville, Pennsylvania.



Carla Peak
Carla Peak

EXHIBIT E

Wells Fargo 2018 Securities Litigation
Timely Requests for Exclusion
John D S Muhlenberg (3.07 shares)
Walter A Meller (no shares identified)
Monica M Lurken (no shares identified)
Monica Goswami (no shares identified)
Kathy Tomlinson (no shares identified)
Cathy Dell (no shares identified)
Nancy Barton Bradford (no shares identified)
Michael S and Sandra M Clapp (no shares identified)
Estate of John Y Embrey, Elizabeth Ann Embrey Anderson and Nancy Embrey Wilkerson Co-Executors (no shares identified)
Charles Anna Marsh (no shares identified)
Robert H Blake Credit Trust, U/W DTD 04/17/2008, Phyllis M Day Trustee (688 shares)
Sandra Thompson Gilliland (no shares identified)
Allan W Trowbridge (Decd), WFCS Custodian Trad IRA (no shares identified)
Barbara A Rand (no shares identified)
Clarence R Petree Revocable Trust, U/A DTD 07/01/1974, Clarence R Petree TTEE (no shares identified)
Mary Thompson (no shares identified)
Estate of Mary K Fiero, Robert S Fiero, Admin (no shares identified)
Aditya Kumar Sikhakolli (no shares identified)
Helen A Srodek (no shares identified)
Katherine H Robinson (100 shares)
Milton J and Gloria S Contaras JTWROS (no shares identified)
Denise Hill Molinsky (200 shares)
Leticia Granados Flynn (0.307 shares)
Leticia Granados Flynn Custodian, Thomas F Flynn UGMA of NY (0.401 shares)
Mark R Struble (no shares identified)
Lee and Nova C Festervan JT TEN WROS (no shares identified)
Ronna J deGracia (no shares identified)
Betty Lou Smith Rev Trust (dec'd), Cindi Smith Dunham Successor Trustee (no shares identified)
Jean L Boskie (no shares identified)
John Randall Wheeler Lvg Trust U/A DTD 6/23/2000, Jo Fuller Wheeler TTEE (no shares identified)
Beverly J Downer (no shares identified)
Dale Marcus (1000 shares)
Betty P Gibson (0.522 shares)
Dana M Thompson (no shares identified)
Virginia R Higdon Trust, Virginia R Higdon TTEE (Decd) u/a dated 8/7/97, John R Higdon Successor Trustee (no shares identified)
Monte Crutchfield (1.174 shares)
Peggy Crutchfield (1.4821 shares)
Karen Creed (no shares identified)
Pavithra D (no shares identified)
Lois H Friedrichsen (no shares identified)
Walter A and Beverly A Meller (no shares identified)
Estate of John A Johnson, Linda Huizenga Executrix (no shares identified)

Wells Fargo 2018 Securities Litigation
Timely Requests for Exclusion
John A Johnson IRA (Decd), WFCS as Custodian, Linda Huizenga Executrix (no shares identified)
Kelly Neely (no shares identified)
Judy Simmons (no shares identified)
Bonnie Ann Bradley (no shares identified)
Joseph M and LeeAnne McGough (no shares identified)
Anne L Olsgaard (no shares identified)
Peggy B Ecker (no shares identified)
Thomas Vorpahl (no shares identified)
Arthur L Olson (Decd), WFCS Custodian Trad IRA (298 shares)
Helene S Ivall Irrevocable Trust, Kevin J Patrick and Randall G Ivall TTEE (1464 shares)
Marvin L Rees (84 shares)
Kei Ho Cheng (no shares identified)
Kay Chen (no shares identified)
Suzanne Steier (no shares identified)
John M Gregory (58 shares)
Patricia M Brown (105 shares)
Clarence Roger Miller (100 shares)
Louise Witt (no shares identified)
Mary Ann Roney (no shares identified)
Theodore and Joycelyn Renois (no shares identified)
Rachel Quackenbush (no shares identified)
Robert Allen (no shares identified)
Law Yee Ha (no shares identified)

Wells Fargo 2018 Securities Litigation
Late Requests for Exclusion
Charles R Maier (no shares identified)
William Holloway (116 shares)
James Cook (90 shares)
Michelle Annette Schumacher FMT CO Cust IRA Rollover (no shares identified)
Roy J and Gladys Smith, Edward Jones Trust Co as Cust (150.28178 shares)
Alain Arsenault (85 shares)
Walter A Meller (no shares identified)
Dale Marcus (1,000 shares)