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Attorneys for Lead Plaintiff

16 UNITED STATES DISTRICT COURT
 17
 18 NORTHERN DISTRICT OF CALIFORNIA

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

20 Plaintiff,)

21 vs.)

22 WELLS FARGO & COMPANY, et al.,)

23 Defendants.)

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

CLASS ACTION

24 SUPPLEMENTAL DECLARATION OF
 ROSS D. MURRAY REGARDING NOTICE
 25 DISSEMINATION AND REQUESTS FOR
 26 EXCLUSION RECEIVED TO DATE

DATE: August 17, 2023

TIME: 10:00 a.m.

CTRM: 11, 19th Floor

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. Pursuant to this Court’s May 1,
4 2023 Order Preliminarily Approving Settlement and Providing for Notice (ECF 230) (“Notice
5 Order”), Gilardi was appointed as the Claims Administrator in connection with the proposed
6 Settlement of the above-captioned litigation (the “Action”). I oversaw the notice services that
7 Gilardi provided in accordance with the Notice Order.

8 2. I submit this declaration as a supplement to my earlier declaration, the Declaration
9 of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion
10 Received to Date (the “Initial Mailing Declaration”) (ECF 233-2). The following statements are
11 based on my personal knowledge and information provided to me by other Gilardi employees and
12 if called to testify I could and would do so competently.

13 **UPDATE ON DISSEMINATION OF NOTICE**

14 3. As more fully detailed in the Initial Mailing Declaration, as of July 12, 2023, Gilardi
15 had emailed 139,828 copies of the Court-approved Postcard Notice and mailed 961,837 copies of
16 the Postcard Notice, for a total of 1,101,665 Postcard Notices. Additionally, Gilardi received a
17 message from one institution noting that they planned to send an estimated 186,877 emails directly
18 to their clients. *See* Initial Mailing Declaration, ¶12.

19 4. Since July 12, 2023, Gilardi has mailed an additional 27,204 copies of the Postcard
20 Notice in response to requests from potential Class Members, brokers, and nominees and as a result
21 of mail returned as undeliverable for which new addresses were identified and re-mailed to those
22 new addresses. Therefore, as of August 9, 2023, Gilardi has emailed and mailed a total of
23 1,128,869 Postcard Notices to potential Class Members and nominees.

24 **REQUESTS FOR EXCLUSION RECEIVED TO DATE**

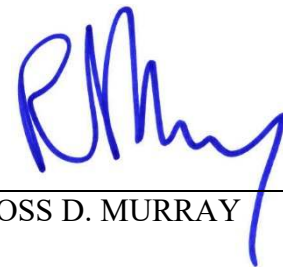
25 5. The Notice of Pendency of Class Action informed potential Class Members that
26 written requests for exclusion from the Class were to be mailed to *Wells Fargo 2018 Securities*
27 *Litigation*, c/o Gilardi & Co. LLC, ATTN: EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-
28 5100, such that they were postmarked no later than January 26, 2023. At the time of the Initial

1 Mailing Declaration, Gilardi reported that it had received 65 timely requests for exclusion, which
2 represent 4,104 shares of Wells Fargo common stock, and eight requests for exclusion that were
3 postmarked after the January 26, 2023 deadline, and which represent 1,647 shares of Wells Fargo
4 common stock. *See* Initial Mailing Declaration, ¶¶16-17.

5 6. Since the Initial Mailing Declaration was executed, and as of the date of this
6 declaration, Gilardi has received three additional requests for exclusion that were postmarked after
7 the January 26, 2023 deadline, representing 85 shares. *See* Exhibit A attached hereto.

8 I declare under penalty of perjury that the foregoing is true and correct and that this
9 declaration was executed this 9th day of August, 2023, at San Rafael, California.

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ROSS D. MURRAY

EXHIBIT A

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)
Beverly A Meller (no shares identified)
Alain Arsenault (85 shares)
Emily M Clayton (no shares identified)