

1 **UNITED STATES DISTRICT COURT**
2 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
3 **SAN FRANCISCO DIVISION**
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5
6 IN RE AIMMUNE THERAPEUTICS, INC.
7 SECURITIES LITIGATION

Case No. 3:20-CV-06733-MMC

8 Hon. Maxine M. Chesney

9 CLASS ACTION
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11 **DECLARATION OF TINA CHIANGO REGARDING CLAIMS**
12 **ADMINISTRATION AND REPORT ON DISTRIBUTION**
13 **OF THE SETTLEMENT FUND**

14 I, TINA CHIANGO, hereby declare and state as follows:

15 I am the Director of Claims Administration for RG/2 Claims Administration LLC
16 (“RG/2 Claims”), whose address is 30 South 17th Street, Philadelphia, PA 19103. I am over
17 the age of 18, have personal knowledge of the matters set forth herein, and if called upon to
18 do so, could testify competently to them.

19 RG/2 Claims is a full service class action settlement administrator offering notice,
20 claims processing, allocation, distribution, tax reporting, and class action settlement
21 consulting services. RG/2 Claims’ experience includes the provision of notice and
22 administration services for settlements arising from antitrust, consumer fraud, civil rights,
23 employment, negligent disclosure, and securities fraud allegations. Since 2000, RG/2
24 Claims has administered and distributed in excess of \$2.1 billion in class action settlement
25 proceeds.

26 On July 21 2025, the Court entered an Order and Final Judgment granting Final
27 Approval of the Settlement. The Settlement Fund and any interest or earnings, less taxes,
28 fees and expenses will be distributed to Authorized Claimants who submitted acceptable

1 proofs of Claims pursuant to the Plan of Allocation approved in the Order.

2 As more fully described in the Declaration of Tina Chiango Regarding
3 Dissemination of the Notice to the Settlement Class (the “Chiango Declaration”), executed
4 on June 26, 2025, RG/2 mailed the Court-approved Notice to potential Class Members,
5 commencing on March 21, 2025. A total of 23,077 Notices were mailed to potential Class
6 Members and an additional 10,421 emails were sent to potential Class Members.

7 Before claims processing commenced, RG/2 created a database dedicated to this
8 Settlement by customizing its proprietary database management software to accommodate
9 the specifics of this Settlement, which included developing various computer programs and
10 screens for entry of Class Members’ identifying and securities information. In addition,
11 RG/2 trained its staff in the specifics of the Settlement so that Claim Forms would be
12 properly processed and formulated a system so that telephone inquiries were properly
13 handled.

14 To date, RG/2 received 4,584 Claim Forms. Of these, 723 were submitted through
15 the online claims portal and 3,861 were filed through the mail or emailed. Once received,
16 each Claim Form was assigned a unique Claim Form number. The information from each
17 Claim Form, including the name, address, and the taxpayer identification number or the
18 social security number of the Claimant, and all claimed holdings was entered into a database
19 developed by RG/2 to process Claim Forms submitted for the Settlement. Next, the
20 information provided by each Claimant in support of his, her, or its Claim Form was
21 reviewed to determine whether the Claimant had in fact held Aimmune Therapeutics, Inc.
22 (“Aimmune”) common stock on October 9, 2020.

23 Many of the Claim Forms submitted were incomplete, not signed, not properly
24 documented, or were otherwise deficient. Much of RG/2’s efforts in handling an
25 administration involve Claimant communications so that all Claimants have sufficient
26 opportunity to cure any deficiencies and file a complete Claim Form. The “Deficiency
27 Process,” which involved letters and emails to Claimants, and inbound and outbound
28 calls/emails to Claimants, was intended to assist Claimants in properly completing their

1 otherwise deficient submissions so that they would be eligible to participate in the
2 Settlement. Accordingly, if a Claim Form was determined to be deficient in whole or in
3 part (for example, if the Claim Form was missing documentation proving the claimed
4 Aimmune common stock held, or if the Claimant did not sign the Claim Form or did not
5 provide enough information to process the Claim), RG/2 generated and mailed notices to
6 Claimants advising them of the deficiency and requesting the submission of the appropriate
7 documentary evidence to correct the defect.

8 In addition, if a Claim Form was determined to be rejected (for example, the Class
9 Member did not hold Aimmune common stock), RG/2 generated and mailed notices to
10 Claimants advising them of the rejection of their Claim and their right to contest such
11 rejection in writing. To date, RG/2 has received no responses contesting the rejections.

12 The postmark deadline for filing a Claim Form was June 6, 2025. To date, RG/2 has
13 received a total of 4,584 Claim Forms. Of the 4,584 Claims Forms received by RG/2, a
14 total of 4,426 were submitted timely and 158 were postmarked after June 6, 2025. A total
15 of 4,249 Claims have been provisionally accepted.

16 RG/2 has accepted 4,249 Claims representing 42,029,765.97 total shares held
17 (including 39,107,489.97 shares held by 4,118 timely Claims and 2,922,276 shares held by
18 131 Claims submitted after June 6, 2025). Each Authorized Claimant shall be allocated a
19 pro rata share of the Net Settlement Fund based on his, her, or its approved shares held as
20 compared to the total approved shares held of all Authorized Claimants.

21 RG/2 has received and processed 158 Claim Forms that were postmarked after June
22 6, 2025. Of these 158 claims, there are 131 totaling 2,922,276 in shares held, that have been
23 found to be otherwise eligible. As no delay resulted from these late but otherwise valid
24 Claims, RG/2 believes that the 131 Late But Otherwise Authorized Claimants should be
25 accepted.

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27 A total of 335 claims were rejected for the following reasons:
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<u>NO. OF</u>	<u>REASON FOR REJECTION</u>
<u>CLAIMS</u>	
122	Did Not Hold Shares of Aimmune common stock on October 9, 2020
37	Did Not Submit Documentation to Support the Claimed Shares
176	Filed Duplicate Claim
<u>335</u>	Total Claims Rejected

As discussed above, each of the 335 Claimants has been notified of the rejection from RG/2.

RG/2 agreed to be the Claims Administrator in exchange for payment of its fees and expenses. Per the Final Approval Order, RG/2 has been approved for a payment for fees and expenses for work performed to date, as well as the estimated fees and expenses to conduct the distribution of the Net Settlement Fund described above of \$96,341. To date, RG/2 has been paid \$63,296 and is due \$33,045 from the Settlement Fund.

RG/2 established an escrow account with Huntington National Bank, and an associated (linked) checking account. As checks are presented each day, only enough funds to cover the presented checks will be moved from the escrow account to the associated checking account.

The current balance of the Settlement Fund is \$21,538,533.64. After taking into account reserve for taxes, balance of Counsel fees, and administrative costs estimated to be \$3,322,325.77, the remaining estimated balance for the Net Settlement Fund will be \$18,216,207.87. RG/2 will be distribute these funds to Authorized Claimants on a pro rata basis based on the number of Aimmune shares they held at the close of business on October 9, 2020. Currently it is estimated that each Authorized Claimant will receive approximately \$0.43 per

1 share. The final balance and pro rata amounts will be determined when the final amount of
2 interest and taxes are calculated at the time of distribution.

3 No distributions will be made to Authorized Claimants who would receive a distribution
4 of less than \$10.00. If an Authorized Claimant's distribution amount is less than this amount,
5 they will be deemed ineligible to receive a payment and their share shall be reallocated to the
6 Authorized Claimants with calculated payments greater than this threshold.

7 All distribution payments shall begin within thirty (30) days from the date of this
8 declaration and accompanied by a statement characterizing the distribution. Checks will be void
9 after 180 days from the issue date.

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11 I declare under penalty of perjury that the foregoing facts are true and correct to the best
12 of my knowledge.

13 Executed this 14th day of November 2025, at Philadelphia, Pennsylvania

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17 Tina Chiango

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