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

Master File No. 3:20-CV-06733-MMC

IN RE AIMMUNE THERAPEUTICS, INC.  
SECURITIES LITIGATION

**CO-LEAD PLAINTIFFS' NOTICE OF  
MOTION, MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND EXPENSES AND  
AWARDS TO CO-LEAD PLAINTIFFS  
PURSUANT TO 15 U.S.C. § 78u-4(a)(4), AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT THEREOF**

Hearing: July 18, 2025  
Time: 9:00 a.m.  
Court: Courtroom 7, 19th Floor  
Judge: Hon. Maxine M. Chesney

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**NOTICE OF MOTION**

**TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

PLEASE TAKE NOTICE that, on July 18, 2025, at 9:00 a.m., or as soon thereafter as counsel may be heard, before the Honorable Maxine M. Chesney, United States District Judge, at the United States Courthouse, United States District Court, Northern District of California, 450 Golden Gate Ave., San Francisco, California, Class Representatives Bruce Svitak and Cecelia Pemberton (“Class Representatives” and, along with Co-Lead Plaintiff Barbara Svitak, “Plaintiffs”)<sup>1</sup> and Class Counsel, Monteverde & Associates PC (“M&A”) and Kahn Swick & Foti, LLC (“KSF,” and together, “Class Counsel”), will and hereby do move for entry of an Order awarding attorneys’ fees and providing for payment of litigation expenses and service awards to Plaintiffs.

This Motion is supported by the following Memorandum of Points and Authorities, the accompanying Declaration of Juan E. Monteverde (“Monteverde Decl.”) and the exhibits thereto, the previous filings in this case, and such other and further representations as may be made by counsel at any hearing on this matter.

**STATEMENT OF ISSUES TO BE DECIDED**

1. Whether the Court should approve as fair and reasonable Class Counsel’s application for attorneys’ fees in the amount of one-third of the Settlement Amount (\$9,166,667), and reimbursement of expenses of \$325,088.72, plus all interest accrued thereon.

2. Whether the Court should award Plaintiffs \$5,000 each (\$15,000 total) for their time and expenses incurred in representing the Class.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

As compensation for their significant efforts in this contingent litigation over more than four years, Class Counsel respectfully request that the Court award attorneys’ fees of one-third of the Settlement Amount, plus the interest earned thereon. A one-third fee award is warranted in this case because: (1) the

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<sup>1</sup> All capitalized terms not defined herein have the same meanings as in the Stipulation of Settlement dated January 17, 2025 (“Stipulation”). ECF No. 244-1.



Settlement is an *exceptional* result that represents a “large sum of money” for Aimmune shareholders (ECF No. 253, Preliminary Approval Transcript, at 3); (2) the Settlement was reached at an advanced procedural stage and after more than **four years** of risky, contingent, and uncompensated litigation efforts and more than \$325,088.72 in unreimbursed expenses; and (3) the requested award is squarely in line with fee awards in other complex class actions and specifically in Section 14 merger class actions – especially in light of the advanced procedural posture of this case – and represents a 1.59x multiplier, which is on the low-end of the range of multipliers that are routinely found to be reasonable in this District in securities class actions. *Knight v. Red Door Salons, Inc.*, No. 08-01520 SC, 2009 U.S. Dist. LEXIS 11149, at \*17 (N.D. Cal. Feb. 2, 2009) (“‘fee awards in class actions average around one-third of the recovery’”) (quoting *Newberg on Class Actions* § 14.6 (4th ed. 2007)).

**The Settlement is an exceptional result.** Class Counsel have secured a **\$27,500,000** settlement for the Settlement Class in this Section 14 merger litigation. This recovery is, (1) to the best of Class Counsel’s knowledge, the only settlement of a Section 14 merger/acquisition action where the target company was subsequently written off as nearly worthless by the acquirer *during the pendency of the action*; (2) at the top of the range of all Section 14 merger/acquisition settlements (despite this write off); and (3) nearly *two times* the median securities settlement in “standard” (*i.e.*, not “merger objection” cases) in 2024.<sup>2</sup> Procuring the sizeable Settlement despite the difficulties of proving Section 14 damages – coupled with an emerging and challenging body of law on these claims – is a testament to Plaintiffs’ and Class Counsel’s efforts.

Indeed, monetary recoveries in post-merger actions like this are “relatively rare”<sup>3</sup> because such actions face unique hurdles to proving economic loss, as shareholders received a premium over

<sup>2</sup> See Edward Flores and Svetlana Starykh, *Recent Trends in Securities Class Action Litigation: 2024 Full-Year Review*, NERA Economic Consulting, (Jan. 22, 2025), available at [https://www.nera.com/content/dam/nera/publications/2025/PUB\\_2024\\_Full-Year\\_Sec\\_Trends\\_0122.pdf](https://www.nera.com/content/dam/nera/publications/2025/PUB_2024_Full-Year_Sec_Trends_0122.pdf). The report notes that the median settlement value was \$14 million in 2024, and that the inflation-adjusted median settlement value ranged from \$9 million to \$14 million in 2021-2023. *Id.* at 1, 23.

<sup>3</sup> Cornerstone Research, *Shareholder Litigation Involving Acquisition of Public Companies, Review of 2015 and 1H 2016 M&A Litigation*, at p. 5 (2016), available at <https://securities.stanford.edu/research->

the stock's trading price in a merger after a sales process during which the corporation's value was vetted by third parties. Accordingly, even if Plaintiffs prevailed on liability, loss causation presented challenges in this case that far exceed the obstacles facing plaintiffs in more frequently litigated Rule 10b-5 cases, which seek losses incurred during a stock price drop. Here, Plaintiffs' loss causation theory was that shareholders were misled into approving an acquisition that undervalued Aimmune, notwithstanding the facts that (1) the merger consideration represented a 174% *premium* over Aimmune's stock price prior to the Merger, (2) there were no higher offers on the table, and (3) perhaps most compelling, Nestle sold Aimmune's primary product at a substantial loss and essentially **wrote off the value of the acquisition while this case was pending** – a fact that, if admitted, would likely have been fatal to Plaintiffs' case. Simply put, Plaintiffs and Class Counsel faced the very real prospect of prevailing in proving liability (which presented its own challenges), only to have the Class receive nothing if the Court or a jury agreed with Defendants and their experts regarding loss causation/damages.<sup>4</sup>

Moreover, the risk of appeal was greater here than in other cases. As the Court may recall, after this action survived Defendants' initial motion to dismiss based in part on a recent Ninth Circuit holding that differentiated between actions based on negligence and fraud, Defendants filed a Rule 12(c) motion in which they cited that same Ninth Circuit opinion for the proposition that it invalidated the private right of action under Section 14(e). ECF 85. Although this Court disagreed, Defendants then sought leave to challenge that ruling and the private right of action in general via interlocutory appeal. ECF 96, 110. Had Plaintiffs obtained a favorable judgment at trial, it is virtually certain that Defendants would have tried for a third time to contest the private right of action, likely to the Supreme Court.

Despite these serious factual and legal challenges, Class Counsel obtained a "large sum of money" for Aimmune shareholders: \$27.5 million in the aggregate, or ~\$0.60 per share. This Settlement is not simply in line with many other Section 14 "merger projection challenge" case settlements in both the aggregate and on a per share basis – **it is superior to them.** See, e.g., *Karri v. Oclaro, Inc., et al.*,

[reports/1996-2016/Shareholder-Litigation-Involving-Acquisitions-of-Public-CompaniesReview-of-2015-and-1H-2016-MA-Litigation.pdf](#).

<sup>4</sup> See ECF Nos. 162 (Defendants' Motion for Summary Judgment); 163 (Defendants' Motion to Exclude in Part, Expert Report and Testimony of William Jeffers).

Case No. 3:18-03435 (N.D. Cal. 2024) (\$15.25 million, \$0.09 per share recovery); *In re Envision Healthcare Corp.*, No. 18-1068-RGA (D. Del.) (\$17.4 million, \$0.14 per share recovery); *NECA-IBEW Pension Trust Fund v. Precision Castparts Corp.*, No. 16-cv-01756-YY (D. Or. 2021) (\$21 million, \$0.40 per share recovery); *accord* Monteverde Decl., Ex. 1 (summary of recent comparable Section 14 class settlements). The Settlement is, simply put, an excellent result for the Class.

**The Settlement was reached after more than four years of litigation, at an advanced procedural stage, and close to trial.** The Settlement was not reached until **nine weeks** before trial was set to start and after **more than four years** of hard-fought litigation over a claim on which not a single case has gone to trial this century. In that time, Class Counsel did virtually everything that can be done in a case before trial. They: (i) conducted a detailed investigation into the claims asserted and drafted an amended complaint; (ii) successfully opposed a 12(b)(6) motion to dismiss; (iii) successfully opposed a Rule 12(c) motion for judgment on the pleadings and a motion for leave to seek an interlocutory appeal; (iv) won a motion for class certification; (v) extensively consulted with a valuation expert and obtained an expert report on damages and loss causation; (vi) drafted and responded to written discovery requests; (vii) obtained and analyzed over 313,000 pages of documents produced by Defendants and third parties (including e-mails, board materials, financial data and projections, analyst reports, and other Merger-related documentation); (viii) conducted **19 depositions**, both fact and expert; (ix) prepared and mailed surveys to approximately 2,104 potential class members regarding the importance of the facts at issue in the case to the reasonable investor; (x) fully briefed a partial motion for summary judgment and an opposition to Defendants' motion for summary judgment; (xi) fully briefed a *Daubert* motion to limit the testimony of Defendant's expert and an opposition to Defendants' motion to limit Co-Lead Plaintiffs' expert; and (xii) participated in a fulsome mediation process with an experienced mediator. *See generally* Monteverde Decl. Simply put, throughout the entire case, Class Counsel have exhibited the diligence, hard work, and skill that justifies the requested fee, and the fee is fair and reasonable in light of Class Counsel's substantial efforts on behalf of the Class and the significant risks they undertook in this Section 14 merger litigation.

**The requested one-third award is common in class actions and represents a 1.59x multiplier, which is squarely in line with other precedent awards.** In litigating this case over the last four years, Class Counsel expended substantial resources, including more than 7,356 hours in professional time and \$325,088.72 in unreimbursed expenses, without any assurance of recovery in a field that is notoriously risky. While significant additional time will be spent in seeking final approval and administering the settlement, Class Counsel's current lodestar is already \$5,748,037.50, and a one-third fee (of \$9,166,667) therefore represents a 1.59x multiplier to the time that Class Counsel has already expended *to date*. As discussed below, a fee request of one-third of the Settlement Amount and a multiplier of less than 2x are both squarely in line with fees routinely granted in complex class actions and specifically in Section 14 merger class actions such as this – especially in light of the advanced procedural posture of this case.

**The requested expenses and incentive awards are likewise reasonable.**

Finally, as outlined below, Class Counsel's unreimbursed expenses are reasonable, and Plaintiffs' requested service awards are likewise "presumptively reasonable," *In re Extreme Networks, Inc. Sec. Litig.*, 2019 U.S. Dist. LEXIS 121886, at \*34 (N.D. Cal. July 22, 2019), in line with the amounts courts in the Ninth Circuit have approved in similar cases, and fully supported by Plaintiffs' efforts and the law, and both should likewise be approved.

**II. HISTORY OF THE LITIGATION AND FACTUAL BACKGROUND**

In accordance with this District's Procedural Guidance for Class Action Settlements ("Northern District Guidelines"), the relevant procedural history and facts will be set out in Plaintiffs' forthcoming memorandum in support of final approval of the Settlement, which will be filed on or before June 27, 2025, in accordance with the Court's Order Preliminarily Approving Settlement (ECF 251), and are thus not repeated here, but are incorporated herein.<sup>5</sup> A similar summary of certain pertinent facts and background may also be found in Co-Lead Plaintiffs' Motion for Preliminary Approval of Settlement and

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<sup>5</sup> See Northern District Guidelines, Final Approval ¶2 ("If the plaintiffs choose to file two separate motions, they should not repeat the case history and background facts in both motions. The motion for attorneys' fees should refer to the history and facts set out in the motion for final approval.").

Memorandum of Points and Authorities in Support Thereof. ECF 243.

### III. THE REQUESTED FEE IS FAIR AND REASONABLE

#### A. A REASONABLE PERCENTAGE OF THE FUND IS THE APPROPRIATE METHOD FOR AWARDING ATTORNEYS' FEES IN A COMMON FUND CASE LIKE THIS

Well-established Supreme Court precedent provides that “a litigant or a lawyer who recovers a common fund for the benefit of persons other than himself or his client is entitled to a reasonable attorneys’ fee from the fund as a whole.” *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980). Under the common fund doctrine, “a private plaintiff, or his attorney, whose efforts create, discover, increase or preserve a fund to which others also have a claim is entitled to recover from the fund the costs of his litigation, including attorneys’ fees.” *Vincent v. Hughes Air W., Inc.*, 557 F.2d 759, 769 (9th Cir. 1977); accord *In re Nat’l Collegiate Athletic Ass’n Grant-in-Aid Cap Antitrust Litig.*, 768 F. App’x 651, 653 (9th Cir. 2019). This Court has also noted that “[t]he use of the percentage-of-the-fund method in common-fund cases is the prevailing practice in the Ninth Circuit for awarding attorneys’ fees and permits the Court to focus on a showing that a fund conferring benefits on a class was created through the efforts of plaintiffs’ counsel.” *In re Capacitors Antitrust Litig.*, 2018 U.S. Dist. LEXIS 169764, at \*43 (N.D. Cal. June 27, 2017) (Donato, J.) (citation omitted).

While courts have discretion to employ either the percentage of recovery or lodestar method, *In re Bluetooth Headset Prods. Liab. Litig.*, 654 F.3d 935, 942 (9th Cir. 2011), the Ninth Circuit has consistently approved the use of the percentage method in common fund cases. See, e.g., *Vizcaino v. Microsoft Corp.*, 290 F.3d 1043, 1047-48 (9th Cir. 2002); see also *In re Omnivision Techs., Inc.*, 559 F. Supp. 2d 1036, 1046 (N.D. Cal. 2008) (“use of the percentage method in common fund cases appears to be dominant”); *Capacitors*, 2018 U.S. Dist. LEXIS 169764, at \*2 (“The percentage-of-the fund method is preferred when counsel’s efforts have created a common fund for the benefit of the class.”) (emphasis in original).

The rationale for compensating counsel on a percentage basis in common fund cases is grounded on principles of equity and fairness. “[C]ourts try to...[tie] together the interests of class members and class counsel” by “teather[ing] the value of an attorneys’ fees award to the value of the class recovery....

The more valuable the class recovery, the greater the fees award...[a]nd vice versa.” *In re HP Inkjet Printer Litig.*, 716 F.3d 1173, 1178 (9th Cir. 2013). Use of the percentage-of-recovery method is particularly appropriate in common fund cases such as this because “the benefit to the class is easily quantified.” *Bluetooth*, 654 F.3d at 942; *Baird v. BlackRock Institutional Tr. Co.*, 2021 U.S. Dist. LEXIS 212886, at \*24-\*25 (N.D. Cal. Nov. 3, 2021) (applying percentage of the fund method and lodestar crosscheck); *Vataj v. Johnson*, 2021 U.S. Dist. LEXIS 214678, at \*23 (N.D. Cal. Nov. 5, 2021) (same). Finally, but importantly, the PSLRA also specifically contemplates that fees be awarded on a percentage basis, authorizing attorneys’ fees and expenses that constitute “a reasonable percentage of the amount of any damages and prejudgment interest actually paid to the class.” 15 U.S.C. § 78u-4(a)(6); *accord In re Am. Apparel, Inc. S’holder Litig.*, 2014 U.S. Dist. LEXIS 184548, at \*66 (C.D. Cal. July 28, 2014) (“Congress plainly contemplated that percentage-of-recovery would be the primary measure of attorneys’ fees awards in federal securities class actions.”).

**B. THE REQUEST FOR ATTORNEYS’ FEES IN THE AMOUNT OF ONE-THIRD OF THE SETTLEMENT FUND IS REASONABLE**

“Courts in the Ninth Circuit applying the ‘percentage of the fund’ approach use a twenty-five percent benchmark.” *Capacitors*, 2018 U.S. Dist. LEXIS 169764, at \*44. Importantly, though, **this benchmark is merely “a starting point for analysis,”** *Vizcaino*, 290 F.3d at 1048, and can “be adjusted” based on “relevant factors” – including, importantly, the “length and complexity of litigation and degree of success.” *Wininger v. SI Mgmt. Ltd. P’ship*, 301 F.3d 1115, 1127 (9th Cir. 2002). **As a result, “in most common fund cases, the award exceeds that benchmark.”** *Omnivision*, 559 F. Supp. 2d at 1047; *see also Booher v. Jetblue Airways Corp.*, No. 4:15-cv-01203-JSW, 2023 U.S. Dist. LEXIS 71342, at \*3 (N.D. Cal. Mar. 24, 2023) (same, noting pertinent factors for deviating from the 25% benchmark “include the result obtained for plaintiffs, quality of representation, complexity of the issues, risk of nonpayment assumed by counsel, reaction of the class to the settlement, and lodestar comparison.”); *Vataj*, 2021 U.S. Dist. LEXIS 214678, at \*25 (same, noting relevant factors include “the contingent nature of the fee and the financial burden carried by the plaintiff; and [] awards made in similar cases”).



To determine what constitutes a reasonable award under the percentage-of-recovery method, and thus whether an upward adjustment to the “starting point” benchmark is warranted, courts in the Ninth Circuit consider the following factors:

(1) The results achieved; (2) the risks of litigation; (3) the skill required and the quality of the work; (4) awards in similar cases; (5) the contingent nature of the representation and the opportunity cost of bringing the suit; (6) reactions from the class; and (7) a lodestar cross-check.

*In re Volkswagen “Clean Diesel” Mktg., Sales Practices, & Prods. Liab. Litig.*, No. 2672 CRB (JSC), 2017 U.S. Dist. LEXIS 39115, at \*721-\*722 (N.D. Cal. Mar. 17, 2017) (citing *Vizcaino*, 290 F.3d at 1048-52). As discussed below, **every one** of these factors weighs heavily in favor of an upward adjustment of the benchmark to one-third of the Settlement Amount.

#### **1. Class Counsel Achieved an Excellent Result for the Settlement Class**

Courts have consistently recognized that the result achieved is “the most critical factor” to consider in making a fee award. *Hensley v. Eckerhart*, 461 U.S. 424, 436 (1983); *Hefler v. Wells Fargo & Co.*, 2018 U.S. Dist. LEXIS 213045, at \*37 (N.D. Cal. Dec. 18, 2018), *aff’d sub nom. Hefler v. Pekoc*, 802 F. App’x 285 (9th Cir. 2020). Here, despite enormous risk (outlined below), Class Counsel obtained an excellent result for the Settlement Class – no matter how measured against similar settlements.

For example, both the aggregate Settlement Amount of \$27.5 million and the per share settlement amount – \$0.60 per share for shares that were valued at \$34.50 per share in the Merger – exceed or are squarely in line with other Section 14 settlements, which raise unique challenges that do not exist in more traditional securities fraud actions under Section 10(b)/Rule 10b-5. These metrics are nearly equivalent to or exceed all five analogous Section 14 “merger projection challenge” case settlements previously identified by Class Counsel in (a) total amount, (b) per share recovery, and (c) per share recovery measured against the company’s share price at the time of the Merger:<sup>6</sup>

<sup>6</sup> *Ziegler v. GW Pharmaceuticals plc*, Case No. 3:21-cv-01019-BAS-MSB (S.D. Cal. 2024); *Karri v. Oclaro, Inc., et al.*, Case No. 3:18-03435 (N.D. Cal. 2024); *Baum v. Harman Int’l Indus. Inc.*, No. 3:17-cv-00246-RNC (D. Conn. 2022); *In re Envision Healthcare Corp.*, No. 18-1068-RGA (D. Del. 2021); *NECA-IBEW Pension Trust Fund v. Precision Castparts Corp.*, No. 16-cv-01756-YY (D. Or. 2021).

Case Name	<i>Ziegler v. GW Pharmaceuticals</i>	<i>Karri v. Oclaro</i>	<i>Baum v. Harman Int'l</i>	<i>In re Envision Healthcare Corp.</i>	<i>NECA-IBEW v. Precision Castparts</i>	<i>Aimmune</i>
Common Fund Amount	\$7.75m	\$15.25m	\$28m	\$17.4m	\$21m	\$27.5m
Number of Shares Held by Class	396m	167.5m	69m	120m	133m	46m
Market Cap / Price Per Share	\$6.81b / \$220 p/ADS	\$1.8b / \$8.62 p/s	\$5.5b / \$111.50 p/s	\$9.9b / \$46 p/s	\$37b / \$235 p/s	\$2.5b / \$34.50 p/s
Average Recovery Per Share	\$0.25	\$0.09	\$0.40	\$0.14	\$0.16	\$0.60
Fee Awarded from Settlement Fund	1/3	1/3	31%	1/3	1/3	Requested 1/3

The proposed Settlement Fund also represents (1) 28.9% of damages based on Aimmune's 52-week high share price (which represented an aggregate plausible damages amount of \$95 million) and (2) 13.7% of the maximum theoretical aggregate damages of \$201.2 million calculated by Plaintiffs' expert, assuming they prevailed on *all* claims against Defendants, which again exceeds the typical range of recoveries secured in comparable securities class actions more generally. *See* Monteverde Decl., ¶10; *Ziegler v. GW Pharmaceuticals plc*, Case No. 3:21-cv-01019-BAS-MSB (S.D. Cal. 2024) (ECF 47-1 and 53) (approving settlement that recovered 1.3% of maximum available damages); *Ferraro Family Foundation, Inc., et al. v. Corcept Therapeutics Inc., et al.*, Case No. 3:19-cv-01372-JD (N.D. Cal. 2023) (ECF 195 and 215) (approving settlement that recovered 7.3% of maximum available damages); *Vataj v. Johnson*, 2021 U.S. Dist. LEXIS 75879, at \*26 (N.D. Cal. Apr. 20, 2021) (preliminarily approving settlement that recovered 2% of estimated damages); *In re*



1 *Extreme Networks, Inc. Sec. Litig.*, 2019 U.S. Dist. LEXIS 121886, at \*27 (approving settlement that  
2 recovered 5%-9.5% of estimated maximum non-disaggregated damages).<sup>7</sup>

3 Accordingly, this “most critical factor” weighs heavily, if not decisively, in favor of an  
4 adjustment to one-third.

## 5 **2. The Litigation Was Risky, Uncertain, and Highly Complex**

6 The “complexity of the issues and risks” undertaken by counsel are also relevant factors to be  
7 considered in fashioning an appropriate percentage-of-the-fund fee award. *In re Pacific Enters. Sec.*  
8 *Litig.*, 47 F.3d 373, 379 (9th Cir. 1995). Section 14 merger cases seeking damages (as opposed to pre-  
9 close injunctive relief) are few and far between and no such case has gone to trial this century. The  
10 dearth of post-close Section 14 merger litigation has led to a limited and inconsistent body of law and  
11 even greater uncertainty for practitioners like Class Counsel that litigate these cases. And the PSLRA  
12 provides well-known significant protections to defendants that make it much harder for plaintiffs to  
13 recover damages. As a result of these facts, numerous courts have recognized that “‘securities actions  
14 are highly complex and...securities class litigation is notably difficult and notoriously uncertain.’”  
15 *Hefler*, 2018 U.S. Dist. LEXIS 213045, at \*37; *see also Mauss v. NuVasive, Inc.*, No. 13cv2005 JM  
16 (JLB), 2018 U.S. Dist. LEXIS 206387, at \*15-16 (S.D. Cal. Dec. 5, 2018) (recognizing that  
17 “[s]ecurities class actions are complex actions to litigate” and often involve “complex and highly  
18 risky trial and likely post-trial appeals and motion practice”); *Scott v. ZST Digit. Networks, Inc.*, 2013  
19 U.S. Dist. LEXIS 197940, at \*11 (C.D. Cal. 2013) (“[C]ases brought under the [PSLRA]...involve a  
20 ‘heightened level of risk’ because PSLRA ‘makes it more difficult for investors to successfully  
21 prosecute securities class actions.’”); *Alaska Elec. Pension Fund v. Flowserve Corp.*, 572 F.3d 221,

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23 <sup>7</sup> *See also Omnivision*, 559 F. Supp.2d at 1046 (noting that a recovery of 9% of possible  
24 damages was “more than triple the average recovery in securities class action settlements”); *Recent*  
25 *Trends in Securities Class Action Litigation: 2024 Full-Year Review*, at 27 (*supra* note 2) (median  
26 ratio of settlement to losses was 1.2% in 2024 and 1.8% from 2021-2023); L.T. Bulan, L.E. Simmons,  
27 *Securities Class Action Settlements, 2022 Review and Analysis*, Cornerstone Research (2023), at 6  
(stating that the median comparable securities class action settlements in 2022 resulted in a recovery  
of 4.3% or 4.4% of estimated damages), [https://www.cornerstone.com/wp-](https://www.cornerstone.com/wp-content/uploads/2023/03/Securities-Class-Action-Settlements-2022-Review-and-Analysis.pdf)  
[content/uploads/2023/03/Securities-Class-Action-Settlements-2022-Review-and-Analysis.pdf](https://www.cornerstone.com/wp-content/uploads/2023/03/Securities-Class-Action-Settlements-2022-Review-and-Analysis.pdf).

235 (5th Cir. 2009) (“[T]o be successful, a securities class-action plaintiff must thread the eye of a needle made smaller and smaller over the years by judicial decree and congressional action.”).

Relatedly, the risk that going forward with litigation might result in no recovery for the Settlement Class, particularly where (as here) complex legal issues are contested, “is a significant factor in the award of fees.” *Omnivision Techs.*, 559 F. Supp. 2d at 1046-47. As outlined in greater depth in Co-Lead Plaintiffs’ forthcoming Motion for Final Approval, Plaintiffs and Class Counsel faced significant risks moving forward with the litigation. While Class Counsel remained confident in their ability to prove their claims at trial, Defendants advanced several credible arguments regarding both liability and damages. For example, Defendants argued that the Recommendation Statement was not false and misleading because it informed stockholders that the Company’s projections had been reduced and included the impact of the maintenance duration assumption on the share price in documents made available to investors with the original Recommendation Statement, as well as in an amendment to the Recommendation Statement. *See* ECF 162, at 10-16 (Defendants’ Motion for Summary Judgment). They likewise argued that, because Palforzia had not reached commercialization at the time of the Merger, the maintenance duration assumption was necessarily an uncertain extrapolation made from a small number of clinical trials, and that Plaintiffs had not adduced evidence that Defendants intended to deceive investors regarding this assumption. *Id.* Defendants also argued that Plaintiffs could not support their claim that Aimmune’s CEO intentionally manipulated the projections, as he had every incentive to maximize his own proceeds in the Merger. *Id.* at 18-19. Simply put, establishing Defendants’ liability at summary judgment or trial would be difficult and complex, with success far from certain. Monteverde Decl., ¶7.

Even more concerning were Defendants’ arguments regarding, and Plaintiffs’ unique hurdle to proving, economic loss in a Section 14 case such as this. Even if liability had been established, Defendants had numerous challenges to loss causation and damages, including the fact that Aimmune stockholders received a 174% premium for their Aimmune shares through the Merger, and that there was no higher offer on the table. ECF 162 at 20-22; 163; Monteverde Decl., ¶8. Although Plaintiffs

believe their loss causation theory is valid under Supreme Court precedent,<sup>8</sup> several lower court opinions have found that, when shareholders receive a premium over the trading price, it forecloses a finding of economic loss, because the merger consideration is “greater than the market value or actual value of the shares without consideration of the merger due to the existence of a merger premium.” *See, e.g., In re Resolute Energy Corp. Sec. Litig.*, No. 19-77-RGA, 2021 U.S. Dist. LEXIS 19193, at \*5, \*10 (D. Del. Feb. 1, 2021) (citing five other opinions in support of proposition). Indeed, based in part on these facts and law, in a motion pending before the Court at the time of the Settlement, Defendants sought to exclude vast swaths of Plaintiffs’ valuation expert’s opinions that, if granted, may have singlehandedly rendered it impossible for Plaintiffs to prove damages at trial. ECF 163; Monteverde Decl., ¶8.

Perhaps most challenging of all, though, was Defendants’ argument that Nestlé had sold Aimmune’s primary product at a substantial loss and **essentially written off the value of the acquisition while this case was pending**. Monteverde Decl., ¶8. Had that fact made its way before the jury, the jury may well have found that Plaintiffs and the Class not only suffered no loss at all, but that Nestlé in fact overpaid for Aimmune to begin with. *Id.* Simply put, “in ‘any securities litigation case, it [is] difficult for [plaintiff] to prove loss causation and damages at trial.’” *In re Zynga Sec. Litig.*, No. 12-cv-04007-JSC, 2015 U.S. Dist. LEXIS 145728, at \*35 (N.D. Cal. Oct. 27, 2015).<sup>9</sup> That is all the more true in this case because of its *unique* economic loss issue, where the target company was essentially written off *while this case was pending*. *Accord* ECF No. 253, Preliminary

<sup>8</sup> *Mills v. Elec. Auto-Lite Co.*, 396 U.S. 375, 389 (1970); *Va. Bankshares v. Sandberg*, 501 U.S. 1083, 1100 (1991); *see also Baum v. Harman Int’l Indus.*, 575 F. Supp. 3d 289, 299 (D. Conn. 2021).

<sup>9</sup> *See also Vinh Nguyen v. Radient Pharms. Corp.*, 2014 U.S. Dist. LEXIS 63312, at \*6 (C.D. Cal. May 6, 2014) (noting that, in securities class actions, “[p]roving and calculating damages required a complex analysis, requiring the jury to parse divergent positions of expert witnesses in a complex area of the law. The outcome of that analysis is inherently difficult to predict and risky.”); *In re Extreme Networks, Inc. Sec. Litig.*, 2019 U.S. Dist. LEXIS 121886, at \*24-\*25 (noting that “[s]ecurities actions, in particular are often long, hard-fought, complicated, and extremely difficult to win” facing “obstacles include[ing] challenges to the material falsity of each alleged misstatement, class certification challenges, loss causation and damages challenges, and the risks inherent in a ‘battle of the experts’ of complex economic theories in a jury trial.”).

Approval Transcript, at 6 (“the case has a lot of hurdles to get over”) and 10 (noting “a lot of factual hurdles and defenses the Defendant was prepared to raise here”).

Barring the Settlement, there was simply no guarantee that any additional benefit would be provided to the Class, and a very real risk that the Class would receive less than the Settlement Amount – *or nothing at all*.<sup>10</sup> Co-Lead Plaintiffs and Class Counsel were not alone in their concerns: the mediator recognized them and made his mediator’s recommendation with them in mind. Monteverde Decl., ¶¶5-6. What is more, as noted above, even if Plaintiffs prevailed at a trial, Defendants had previously contested whether there remains a private right of action under Section 14(e) at all, and they were sure to raise that challenge and pursue it through appeal – and likely to the Supreme Court – a process that would further extend the litigation for years and risked reversal of any verdict. *Accord* ECF No. 253, Preliminary Approval Transcript, at 10 (noting risk of appeal and time associated therewith).

Class Counsel met these challenges and uncertainty head on at every procedural stage, defeating a motion to dismiss, a motion for judgment on the pleadings, *and* a motion for leave to seek an interlocutory appeal; winning class certification; engaging in extensive discovery (including over 313,000 pages of documents and 19 depositions); retaining experts; opposing Defendants’ motion for summary judgment and *Daubert* motion; and preparing the case for trial – which was just two months away at the time of Settlement. Monteverde Decl., ¶¶4-9. Indeed, Plaintiffs pressed the case to the precipice: the parties did not agree to a settlement in principle until just *one day* before the dispositive motion hearing, and only then after a double-blind mediator’s proposal. *Id.* at ¶6. The Settlement is, simply put, a testament to Class Counsel’s efforts and dogged determination in the face of significant obstacles to recovery. Accordingly, this factor too weighs heavily in favor of an adjustment to one-third.

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<sup>10</sup> Indeed, from 1996 to 2018, only 25 securities class actions (*of any kind*) went to a verdict and of those 25, only 13 resulted in a verdict for plaintiffs. Kevin LaCroix, THE D&O DIARY, *Rare Securities Class Action Lawsuit Trial Results in Partial Verdict for Plaintiffs* (Feb. 5, 2019), <https://www.dandodiary.com/2019/02/articles/securities-litigation/rare-securities-class-action-lawsuit-trial-results-partial-verdict-plaintiffs/>.

### 3. The Skill Required and Quality of the Work

“The ‘prosecution and management of a complex national class action requires unique legal skills and abilities.’ This is particularly true in securities cases because the [PSLRA] makes it much more difficult for securities plaintiffs to get past a motion to dismiss.” *Omnivision Techs.*, 559 F. Supp. 2d at 1047; *see also Richardson v. THD At-Home Servs.*, 2016 U.S. Dist. LEXIS 46784, at \*23 (E.D. Cal. Apr. 5, 2016) (“The complexity of issues and skills required may weigh in favor of a departure from the benchmark fee award”). Class Counsel have significant experience with securities class actions and advocating for shareholder rights, especially in the merger field, and they effectively utilized their skill and experience to procure an outstanding Settlement. Their demonstrated skill and the quality of their work further supports the reasonableness of the requested fee.

As noted, and as this Court is aware, Class Counsel successfully overcame several potentially dispositive motions and vigorously advocated for the Settlement Class for more than four years. Indeed, one of the primary reasons that this case settled on the precipice of trial and did not proceed to a potentially devastating jury verdict or appeal was the skillful advocacy and reputations of Class Counsel. As outlined in Plaintiffs’ forthcoming Motion for Final Approval (and as this Court recognized), Class Counsel have *significant* experience prosecuting securities class actions and a well-documented history of achieving valuable outcomes for investors, and their skill and zealous advocacy in shareholder litigation are well-recognized. *See generally* Monteverde Decl; ECF 253 Preliminary Approval Transcript at 10 (“everybody is experienced as counsel”). M&A was ranked in the Top 30 in the 2024 ISS Securities Class Action Services Report in recognition of the substantial settlements achieved by the firm on behalf of shareholders, and KSF was ranked in the Top 10 of the 2024 ISS Securities Class Action Services Report and has secured significant settlements for shareholders. Monteverde Decl., Exs. 2 and 3 (firm resumes); ISS, *Top 50 Plaintiff Law Firms 2024*, available at <https://www.issgovernance.com/library/top-50-plaintiff-law-firms-2024/>. What is more, the *specific* attorneys in this matter are *exclusively* merger litigators and have secured many significant merger settlements and changed the law for tender offers in this Circuit. *Id.*

Class Counsel’s track record speaks to their skill and experience – skill and experience that

benefitted the Settlement Class here. Their skill, experience, perseverance, and reputation as highly skilled merger litigators and strong shareholder advocates were significant contributing factors to the outstanding result obtained here, particularly given the risks in continuing this litigation through trial.

The standing of opposing counsel also merits consideration, because that standing reflects the challenges faced by Class Counsel and the skill necessary to meet those challenges. *See, e.g., Wing v. Asarco Inc.*, 114 F.3d 986, 989 (9th Cir. 1997) (noting the district court’s evaluation of the job done by class counsel “in light of the quality of opposition counsel and [defendant’s] record of success in such litigation”). Defendants were represented by a team of experienced attorneys from Latham & Watkins, one of the nation’s premier defense firms. Defense counsel expended considerable effort and expense in their zealous defense against Plaintiffs’ claims. The favorable result obtained by Class Counsel against this formidable firm and their well-financed clients and despite their zealous advocacy are further evidence of Class Counsel’s skill and supports the requested fee.

#### 4. The Requested Fee Is Consistent with Awards in Similar Cases

As noted, “[a]lthough 25% is the benchmark for a reasonable fee award, ‘in most common fund cases, **the award exceeds that benchmark.**’” *Bailey v. Kinder Morgan G.P., Inc.*, No. 18-cv-03424-TSH, 2020 U.S. Dist. LEXIS 176922, at \*19 (N.D. Cal. Sept. 25, 2020) (quoting *Omnivision*, 559 F. Supp. 2d at 1047); *Booher*, 2023 U.S. Dist. LEXIS 71342, at \*3 (same).

Indeed, courts in the Ninth Circuit (including this District) routinely award attorneys’ fees representing one-third of the common fund. *See, e.g., Morris v. Lifescan, Inc.*, 54 Fed. Appx. 663, 664 (9th Cir. 2003) (affirming 33% fee in \$14.8 million settlement); *In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 463 (9th Cir. 2000) (affirming one-third fee in \$1.725 million fund); *In re Pacific Enters. Sec. Litig.*, 47 F.3d 373, 379 (9th Cir. 1995) (affirming 33% fee in \$12 million settlement); *Jiangchen v. Rentech, Inc.*, No. CV 17-1490, 2019 U.S. Dist. LEXIS 180474, at \*36 (C.D. Cal. Oct. 10, 2019) (awarding 33.33% fee in \$2.05 million settlement); *Singer v. Becton Dickinson & Co.*, 2010 U.S. Dist. LEXIS 53416, at \*23 (S.D. Cal. 2010) (“33.33% of the common fund falls within the typical range of 20% to 50% awarded in similar cases”); *Romero v. Producers Dairy Foods, Inc.*, No. 1:05cv0484 DLB, 2007 U.S. Dist. LEXIS 86270, at \*4 (E.D. Cal. Nov. 14, 2007) (approving a fee award



1 of 33% of the common fund, and stating that “[e]mpirical studies show that, regardless whether the  
 2 percentage method or the lodestar method is used, fee awards in class actions average around one-third  
 3 of the recovery”) (citing 4 Newberg and Conte, *Newberg on Class Actions* § 14.6 (4th ed. 2007)).

4 A one-third fee is also well within the range of percentage-of-the-fund fees that courts in this  
 5 Circuit have awarded specifically in similar complex class actions, including similar Section 14  
 6 merger class actions. *See, e.g., Karri v. Oclaro, Inc.*, 18-cv-3435-JD (N.D. Cal. 2024) (Donato, J.)  
 7 (ECF No. 225) (one-third of \$15.25 million §14 merger settlement); *Davis v. Yelp, Inc.*, 2023 U.S.  
 8 Dist. LEXIS 40323, at \*6 (N.D. Cal. Jan. 27, 2023) (33% of \$22.25 million settlement in securities  
 9 case and collecting cases awarding same percentage of similarly sized common funds); *In re*  
 10 *Capacitors Antitrust Litig.*, 2023 U.S. Dist. LEXIS 37407, at \*17-18 (N.D. Cal. Mar. 6, 2023)  
 11 (Donato, J.) (40% of \$165 million partial settlement, resulting in cumulative 31.01% award of total  
 12 \$604,550,000 settlement); *Andrews v. Plains All Am. Pipeline L.P.*, 2022 U.S. Dist. LEXIS 172183,  
 13 at \*10 (C.D. Cal. Sept. 20, 2022) (32% of \$230 million settlement); *Plant v. Jaguar Animal Health,*  
 14 *Inc.*, 17-cv-4102-RS (N.D. Cal. May 27, 2021) (ECF No. 97) (33% of \$2.6 million §14 merger  
 15 settlement); *In re Lidoderm Antitrust Litig.*, 2018 U.S. Dist. LEXIS 162425, at \*32 (N.D. Cal. Sept.  
 16 20, 2018) (33% of \$104.75 million settlement); *Ziegler v. GW Pharmaceuticals plc*, Case No. 3:21-  
 17 cv-01019-BAS-MSB (S.D. Cal. 2024) (ECF 55) (one-third of \$7.75 million §14 merger settlement);  
 18 *In re Pac. Enters. Sec. Litig.*, 47 F.3d 373, 379 (9th Cir. 1995) (33% of \$12 million settlement); *In re*  
 19 *Tezos Sec. Litig.*, No. 3:17-cv-06779-RS (N.D. Cal. Aug. 28, 2020) (ECF No. 262) (33% of \$25  
 20 million recovery in securities action).

21 The Ninth Circuit has also noted that the “market rate for the particular field of law” should be  
 22 considered, as it is ““appropriate to examine lawyers’ reasonable expectations, which are based on the  
 23 circumstances of the case and the range of fee awards out of common funds of comparable size.”” *In re*  
 24 *Facebook Biometric Info. Priv. Litig.*, 522 F. Supp. 3d 617, 632 (N.D. Cal. 2021) (citing *Vizcaino*, 290  
 25 F.3d at 1050). A one-third fee is supported by the market rate in similar Section 14 settlements throughout  
 26 the country, and Class Counsel specifically have been awarded fees of one-third of the common fund  
 27 in other recent Section 14 settlements that they have secured, including in *Oclaro*, *Envision*

Healthcare, GW Pharmaceuticals, Transgenomic, and Jaguar Health. See *Karri v. Oclaro, Inc.*, 18-cv-3435-JD (N.D. Cal. 2024) (ECF 225) (1/3 of \$15.25 million settlement); *Ziegler v. GW Pharmaceuticals plc*, Case No. 3:21-cv-01019-BAS-MSB (S.D. Cal. 2024) (ECF No. 55) (1/3 of \$7.75 million settlement); *In re Envision Healthcare Corp.*, Case No. 1:18-cv-01068-RGA-SRF, (D. Del. Feb. 16, 2021) (ECF No. 105) (1/3 of \$17.4 million settlement); *Campbell v. Transgenomic, Inc.*, No. 4:17-CV-3021, 2020 U.S. Dist. LEXIS 97063, at \*10 (D. Neb. June 3, 2020) (1/3 of \$1.95 million settlement); *Plant v. Jaguar Animal Health, Inc. et al.*, Case No. 3:17-cv-04102-RS (N.D. Cal. May 27, 2021) (ECF No. 97) (1/3 fee of \$2.6 million settlement); see also *NECA-IBEW Pension Trust Fund v. Precision Castparts Corp, et al.*, 16-cv-01756-YY (D. Or. 2021) (ECF No. 169) (1/3 of \$21 million settlement); *Murray v. Earthlink Holdings Corp.*, No. 4:18-cv-00202-JM, 2025 U.S. Dist. LEXIS 26525 (E.D. Ark. Feb. 6, 2025) (32% of \$85 million settlement).

Finally, the advanced procedural posture of this case should also be considered. *Rodriguez v. Nike Retail Servs.*, No. 14-cv-01508-BLF, 2022 U.S. Dist. LEXIS 15413, at \*12, 18 (N.D. Cal. Jan. 27, 2022) (finding requested fee of one-third “reasonable, especially in light of the significant amount of work Class Counsel performed in this case,” where settlement was reached after years of litigation and substantial discovery, including depositions of witnesses and experts); *Wininger*, 301 F.3d at 1127 (relevant factors for upward adjustment includes “length and complexity of litigation”). As noted, Class Counsel took this case to the precipice, settling one day before the summary judgment motion hearing and just two months before trial. *Accord* ECF No. 253, Preliminary Approval Transcript, at 6 (noting that “there was a lot of work done on this case”) and 12 (noting that “there has been a very thorough investigation of the case by Plaintiff’s counsel” and it “has been pre-tested in various ways”).

In light of this fact in particular, the requested fee award is consistent with fee awards in past securities and other complex class action cases by this Court. For example, when presented with settlements in cases that settled early (at the motion to dismiss stage) and without much effort, this Court has awarded modest percentage-of-the-fund fee awards. See, e.g., *Sterrett v. Sonim Technologies, et al*, Case No. 3:19-cv-06416-MMC, ECF No. 107, 115 (N.D. Cal. Mar. 5, 2021)



(case settled when MTD pending; \$500K fee award representing 25% of fund); *In re SiRF Technology Holdings, Inc. Securities Litig.*, Case No. 3:08-cv-00856-MMC, ECF 154, 157 (N.D. Cal. Jan. 8, 2010) (case settled when MTD pending; \$580K fee award representing 20% of fund); *In re Veritas Software Corp. Securities Litig.*, Case No. C-03-0283-MMC, ECF No. 246 (Feb. 23, 2008) (case settled when third MTD pending; \$6M fee award representing 17% of fund).<sup>11</sup> By contrast, when presented with settlements in cases that settled at an advanced procedural stage, after the expenditure of significant time, effort, and money by counsel, as in this case, this Court has rewarded counsel for that effort and the risk they undertook by awarding them one-third of the fund. *See, e.g., Miguel v. Salesforce.com*, Case No. 3:20-cv-01753-MMC (N.D. Cal. 2025) (ECF. Nos. 190 and 200) (case settled on the eve of trial; \$449,955 fee award representing one-third of fund). This Court should do the same here, and this factor likewise weighs heavily in favor of an adjustment to one-third.

**5. The Contingent Nature of the Fee, the Financial Burden Carried by Class Counsel, and the Opportunity Cost of Bringing Suit**

“It is an established practice in the private legal market to reward attorneys for taking the risk of non-payment by paying them a premium over their normal hourly rates for winning contingency cases.” *In re Wash. Pub. Power Supply Sys. Secs. Litig.*, 19 F.3d 1291, 1299 (9th Cir. 1994). This practice encourages the legal profession to assume such a risk and “assur[es] competent representation for plaintiffs who could not afford to pay on an hourly basis regardless of whether they win or lose.” *Id.* “The importance of assuring adequate representation for plaintiffs who could not otherwise afford competent attorneys justifies providing those attorneys who do accept matters on a contingent-fee basis a larger fee than if they were billing by the hour or on a flat fee.” *Omnivision Techs.*, 559 F. Supp. 2d at 1047. Thus, “courts tend to find above-market-value fee awards” in contingency fee cases more appropriate, to encourage counsel to take on such cases for the benefit of plaintiffs who could not afford to pay hourly fees. *Deaver v. Compass Bank*, 2015 U.S. Dist. LEXIS 166484, at \*35 (N.D. Cal. Dec. 11, 2015); *Omnivision Techs.*, 559 F. Supp. 2d at 1047.

<sup>11</sup> Notably, all of these cases were Section 10(b) securities fraud cases, which tend to be easier to bring than Section 14 cases, as they are usually spawned by public stock drops and investigations, whereas Section 14 cases must be built by diligent counsel.

“This incentive is **especially important in securities cases**,” *Stanger v. China Elec. Motor, Inc.*, 812 F.3d 734, 741 (9th Cir. 2016), as attorneys undertake “immense risks” in “prosecuting complex cases in which there is a great risk of no recovery.” *In re NCAA Ath. Grant-In-Aid Cap. Antitrust Litig.*, 2017 U.S. Dist. LEXIS 201108, at \*15 n. 42 (N.D. Cal. Dec. 6, 2017). Indeed, there have been many securities class actions in which counsel for the plaintiffs took on the risk of pursuing claims on a contingency basis, expended thousands of hours and millions of dollars, and received no remuneration despite their diligence and expertise. *See supra* note 10 (nearly half of all securities class actions that have gone to verdict resulted in no recovery). One notable recent example is the securities class action against Tesla in this District. After *years* of litigation, and despite the fact that the Court granted partial summary judgment on certain elements in *plaintiff’s favor*, after a lengthy trial, the jury returned a verdict in *defendants’ favor*. *In re Tesla, Inc. Sec. Litig.*, 2022 U.S. Dist. LEXIS 88609 (N.D. Cal. Apr. 1, 2022) and *Tesla*, No. 3:18-cv-04865-EMC (ECF No. 671) (N.D. Cal. Feb. 3, 2023); *In re Tesla Inc.*, 2023 U.S. Dist. LEXIS 103682 (N.D. Cal. Jun. 14, 2023) (denying plaintiffs’ motion for judgment as a matter of law or for a new trial).

While the contingent risks to plaintiff’s counsel in securities actions are well-recognized, the risks faced by Class Counsel here were greater than usual as a result of the evidentiary record and need to prove that the Class suffered an economic loss, despite the enormous premium they received, the lack of any competing offers, and the fact that Nestle wrote off its investment in Aimmune – a fact that could have singlehandedly supported a jury verdict of zero. The risks faced by Class Counsel here were also magnified by the fact that they are both boutique securities firms, and litigating this Action required the devotion of a significant amount of their finite resources and the foregoing of other opportunities. Montverde Decl., ¶14. This too should be taken into account. *See Denton v. Pennymak Loan Servs., LLC*, 252 F. Supp. 3d 504, 518 (E.D. Va. 2017) (noting that counsel “is a small law firm and thus representing a client on a contingent fee...basis necessarily involved loss of other opportunities.”).

As noted, to date, Class Counsel have worked for more than four years without compensation, investing in that time 7,356 hours, for a total lodestar of \$5,748,037.50, and also

incurring unreimbursed expenses of \$325,088.72. Monteverde Decl. ¶20. Had Class Counsel lost this case, that economic loss would have been significant to them, and if small contingency-fee firms are not granted multipliers when they win, they can go out of business when they lose. Class Counsel's significant commitment of time, money, and resources litigating this Action, the substantial contingent risk they took in so doing, and the lost opportunity costs they incurred as a result likewise weigh heavily in favor of an adjustment to one-third.

#### 6. The Reaction of the Class

The reaction of the class is also a factor courts within this Circuit consider when evaluating a requested fee. *Omnivision Techs.*, 559 F. Supp. 2d at 1042. While a certain number of objections are to be expected in a large class action such as this, "the absence of a large number of objections to a proposed class action settlement raises a strong presumption that the terms of a proposed class settlement action are favorable to the class members." *Nat'l Rural Telecomms. Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 529 (C.D. Cal. 2004); *Hefler v. Wells Fargo & Co.*, No. 16-cv-05479-JST, 2018 U.S. Dist. LEXIS 213045, at \*41 (N.D. Cal. Dec. 17, 2018) ("As with the Settlement itself, the lack of objections from institutional investors 'who presumably had the means, the motive, and the sophistication to raise objections' [to the attorneys' fee] weighs in favor of approval."); *Churchill Vill., L.L.C. v. GE*, 361 F.3d 566, 577 (9th Cir. 2004) (affirming settlement with 45 objections out of 90,000 notices sent).

Here, the Class was informed in the Notice that Class Counsel would move the Court for an award of attorneys' fees not to exceed one-third of the Settlement Amount and payment of litigation expenses not to exceed \$450,000. ECF No. 251-1 (Notice). The Notice advised Class Members of their right to object to the proposed fee and expense request and that such objections are to be filed with the Court no later than June 6, 2025. *Id.* While this deadline has not yet passed, a low number of objections would further support the request fee award here.

#### 7. A Lodestar Cross-Check Confirms the Reasonableness of the Requested Fee

Finally, the Ninth Circuit has explained that the lodestar method may be used to crosscheck the reasonableness of the percentage-based award of attorneys' fees, *Vizcaino*, 290 F.3d at 1050, and

that “[t]he benchmark percentage should be adjusted” when circumstances indicate that a 25% recovery would be too small “in light of the hours devoted to the case.” *Six Mexican Workers v. Ariz. Citrus Growers*, 904 F.2d 1301, at 1311 (9th Cir. 1990). In other words, courts in the Ninth Circuit may, *but are not required to*, assess the reasonableness of the fee request through a cross-check of counsel’s lodestar. *Farrell v. Bank of Am. Corp., N.A.*, 827 F. App’x 628, 630 (9th Cir. 2020) (declining to mandate “[cross-check] requirement”). “While the primary basis of the fee award remains the percentage method, the lodestar may provide a useful perspective on the reasonableness of a given percentage award,” and is especially “helpful in **suggesting a higher percentage when litigation has been protracted**” – as is the case here. *Vizcaino*, 290 F.3d at 1050.

In this case, the lodestar cross-check confirms the reasonableness of Class Counsel’s fee request. As noted, over more than four years, Class Counsel have expended 7,356 hours litigating this action, resulting in a total lodestar of \$5,748,037.50. Monteverde Decl., ¶20.<sup>12</sup> Significant additional uncompensated work in connection with the Settlement and claims administration will be incurred going forward. Indeed, in Class Counsel’s experience, preparing for final approval and administering a settlement, which itself can often take as much as a year, often results in the expenditure of at least an additional 100 hours.

Even without factoring in that additional expenditure of time, Class Counsel’s fee request reflects a lodestar multiplier of 1.59x, which is on the low-end of the typically cited range.<sup>13</sup> This is more than

<sup>12</sup> The rates charged by Class Counsel (between \$350-\$850 for associates and between \$1,000-\$1,250 for partners) are market billing rates that reflect the attorneys’ skill and experience. Monteverde Decl., ¶16 and Ex. 8 (Palestina Declaration). *See, e.g., Fleming v. Impax Laby’s Inc.*, 2022 U.S. Dist. LEXIS 125595, at \*28 (N.D. Cal. July 15, 2022) (approving hourly rates of \$760 to \$1,325 for partners, \$895 to \$1,150 for counsel, and \$175 to \$520 for associates, and noting that such “billing rates [are] in line with prevailing rates in this district for personnel of comparable experience, skill, and reputation”); *Hefler*, 2018 U.S. Dist. LEXIS 213045, at \*39 (finding rates ranging from \$650 to \$1,250 for partners or senior counsel and from \$400 to \$650 for associates as reasonable). *Accord Khoja v. Orexigen Therapeutics*, No. 15cv00540-JLS-AGS, 2021 U.S. Dist. LEXIS 230105, at \*31 and ECF No. 149-5, PageID.3786 (S.D. Cal. Nov. 30, 2021) (holding that the lodestar cross-check (which included KSF partner rates of \$925-\$1,100) supported a 33% fee).

<sup>13</sup> Adding the to-be-incurred time that counsel will spend securing final approval and administering the settlement would yield a total lodestar multiplier closer to 1.55x – for uncompensated work performed *over a 5+ year period*.

reasonable, as courts in this Circuit frequently award multipliers of as high as 4x. *See e.g., Capacitors*, 2018 U.S. Dist. LEXIS 169764, at \*52 (noting that, “[i]n the Ninth Circuit, a lodestar multiplier of around 4 times has frequently been awarded in common fund cases”); *Hopkins v. Stryker Sales Corp.*, No. 11-CV-02786-LHK, 2013 U.S. Dist. LEXIS 16939, at \*12 (N.D. Cal. Feb. 6, 2013) (“[m]ultipliers of 1 to 4 are commonly found to be appropriate in complex class action cases”); *Winters v. Two Towns Ciderhouse, Inc.*, No. 20-cv-00468-BAS-BGS, 2021 U.S. Dist. LEXIS 89872, at \*6 (S.D. Cal. May 11, 2021) (“lodestar of 1.675 is not unreasonable or out of the realm of multipliers other courts have awarded”) (citing *Vizcaino*, 290 F.3d at 1043 (upholding a lodestar multiplier of 3.65)); *Facebook*, 522 F. Supp. 3d at 633 (awarding fee in \$650 million common fund settlement representing 4.71 multiplier); *In re Verifone Holdings, Inc. Sec. Litig.*, 2014 U.S. Dist. LEXIS 20044, at \*11-12 (N.D. Cal. Feb. 18, 2014) (noting that “over 80% of multipliers fall between 1.0 and 4.0” and awarding fee reflecting 4.3 multiplier); *Corzine v. Whirlpool Corp.*, 2019 U.S. Dist. LEXIS 223341, at \*32 (N.D. Cal. Dec. 31, 2019) (“**a lodestar multiplier of 1.86 is modest**”); *Buccellato v. AT & T Operations, Inc.*, 2011 U.S. Dist. LEXIS 85699, at \*4 (N.D. Cal. June 30, 2011) (“multiplier of 4.3 is reasonable”); *Kelly v. Wengler*, 822 F.3d 1085, 1093, 1105 (9th Cir. 2016) (affirming lodestar multipliers of 2.0 and 1.3). Indeed, this Court *specifically* has awarded lodestar multipliers as high as 4x in past complex class action cases. *See, e.g., In re Veritas Software Corp. Securities Litig.*, Case No. C-03-0283-MMC (ECF No. 246) (Feb. 23, 2008). Accordingly, this factor too weighs heavily in favor of the requested fee adjustment.

\* \* \*

In sum, in light of the significant risks undertaken and resources invested by Class Counsel over more than four years, their zealous advocacy, and the results they obtained for the Class, the requested fee is reasonable. **All of the relevant factors support the requested fee award**, and Class Counsel respectfully request that the Court grant it.

#### IV. **CLASS COUNSEL’S EXPENSES ARE REASONABLE AND SHOULD BE APPROVED**

An attorney is entitled to “recover as part of the award of attorney’s fees those out-of-pocket expenses that would normally be charged to a fee paying client.” *Harris v. Marhoefer*, 24 F.3d 16, 19 (9th Cir. 1994) (internal quotation marks and citation omitted). “Expense reimbursements comport with the

notion that the district court may ‘spread the costs of the litigation among the recipients of the common benefit,’” *Grace v. Apple, Inc.*, 2021 U.S. Dist. LEXIS 66294, at \*17-18 (N.D. Cal. Mar. 31, 2021), and should therefore be paid from the common fund. *Ochoa v. McDonald’s Corp.*, 2016 U.S. Dist. LEXIS 157302, at \*8-9 (N.D. Cal. Nov. 14, 2016) (“expenses should be paid from the common fund because all class members should contribute their fair share of the costs of the litigation from which they benefitted”).

Here, although the Notice informed Class Members that Class Counsel would seek reimbursement of up to \$450,000 in expenses, Class Counsel is only seeking expenses of \$325,088.72. As outlined in the itemized list of costs and expenses by category provided, the expenses sought are the type routinely charged to hourly paying clients; every dollar of those expenses was incurred for the benefit of the Class; and Class Counsel took pains to limit those expenses to all that was required to secure a favorable result, and nothing more. Monteverde Decl., ¶¶17-18; *Khoja*, 2021 U.S. Dist. LEXIS 230105, at \*33-34 (approving Lead Counsel’s expenses such as expert and consulting fees, printing, photocopying, postage, transcript fees, mediation expenses, court filing fees and court reporting fees as the “types of expenses [] typically incurred by counsel in complex litigation and [] routinely charged to clients billed by the hour.”). Indeed, nearly all of Class Counsel’s expenses were incurred either for the retention of experts (\$196,882.00), depositions (\$50,594.76), or mediation (\$40,457.50) (representing \$287,934.26 of \$325,088.72 in total expenses), and **Class Counsel has excluded from its expense request the travel and lodging expenses incurred by M&A and KSF – a New York City and a New Orleans based law firm – in prosecuting the Action, which included multiple trips to the West Coast for depositions and hearings.** Monteverde Decl., ¶18. **The excluded travel and lodging fees, which were substantial, will be borne entirely by Class Counsel.** *Id.*

In light of the fact that the expenses sought here are routinely charged to clients and reasonably incurred in prosecuting and settling the Action, Class Counsel respectfully request that the Court award Class Counsel the entirety of their requested \$325,088.72 in unreimbursed expenses.

**V. PLAINTIFFS’ REQUESTED SERVICE AWARDS ARE REASONABLE AND SHOULD ALSO BE APPROVED**

Pursuant to the PSLRA, a class representative may seek an award of reasonable costs and



1 expenses directly relating to the representation of the class. *See* 15 U.S.C. § 78u-4(a)(4). Such awards  
 2 are “intended to compensate class representatives for work done on behalf of the class, to make up for  
 3 financial or reputational risk undertaken in bringing the action, and, sometimes, to recognize their  
 4 willingness to act as a private attorney general.” *Rodriguez v. W. Publ’g Corp.*, 563 F.3d 948, 958-59  
 5 (9th Cir. 2009); *accord In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934, 943 (9th Cir. 2015)  
 6 (“incentive awards that are intended to compensate class representatives for work undertaken on  
 7 behalf of a class ‘are fairly typical in class actions cases’”). Factors considered in making such award  
 8 include “‘the actions the plaintiff has taken to protect the interests of the class, the degree to which the  
 9 class has benefitted from those actions...[and] the amount of time and effort the plaintiff expended in  
 10 pursuing the litigation.’” *Staton v. Boeing Co.*, 327 F.3d 938, 977 (9th Cir. 2003) (ellipses in original).

11 As set forth in their Declarations, over the past four years, each Plaintiff devoted at least 50-  
 12 60 hours of their time to this Action. Monteverde Decl., Exs. 4-6 (Declarations of Plaintiffs). This  
 13 time included communicating with Class Counsel regarding case status and strategy, reviewing  
 14 important case documents (like the complaints, motions and briefs, court orders, mediation papers,  
 15 and/or settlement documents), collecting and producing documents to Defendants, answering  
 16 interrogatories and requests for admission, and preparing for and attending/**sitting for depositions**.  
 17 *Id.* And, as noted, those efforts resulted in an excellent result for the Class.

18 For this service, Plaintiffs – who were the *only* plaintiffs to litigate this action on behalf of the  
 19 Class – each seek a \$5,000 service award pursuant to 15 U.S.C. § 78u-4(a)(4) as reimbursement for  
 20 their time and expenses in representing the Settlement Class. These requested awards are fully supported  
 21 by the law. *Bellinghausen v. Tractor Supply Co.*, 306 F.R.D. 245, 266 (N.D. Cal. 2015) (collecting  
 22 cases and noting that, “[i]n this district, a \$5,000 payment is presumptively reasonable,” and service  
 23 awards “typically range from \$2,000 to \$10,000”); *Todd v. STAAR Surgical Co.*, No. CV 14-5263  
 24 MWF (GJSx), 2017 U.S. Dist. LEXIS 176183, at \*15-16 (C.D. Cal. Oct. 24, 2017) (collecting  
 25  
 26  
 27  
 28

“numerous cases in which service awards of \$10,000 or more are found reasonable”).<sup>14</sup>

Class Counsel likewise believe service awards of this amount are fully supported by Plaintiffs’ efforts. Finally, but importantly, the Notice stated that Plaintiffs would seek up to \$25,000 in aggregate service awards, and, to date, no objections have been made. ECF No. 251-1 (Notice). Plaintiffs therefore respectfully request that the Court award each Plaintiff a \$5,000 service award.

## **VI. CONCLUSION**

For the foregoing reasons, Class Representatives and Class Counsel respectfully request that the Court award: (i) attorneys’ fees of one-third of the Settlement Amount (\$9,166,667) and payment of \$325,088.72 in litigation expenses, plus interest on both amounts at the same rate earned by the Settlement Amount; and (ii) Plaintiffs’ service awards of \$5,000 each.

Dated: May 2, 2025

Respectfully submitted,

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*Counsel for Co-Lead Plaintiffs and Class Counsel*

<sup>14</sup> Such awards also would “not constitute inequitable treatment of class members.” *Extreme Networks*, 2019 U.S. Dist. LEXIS 121886, at \*26; *accord In re Online DVD-Rental Antitrust Litig.*, 779 F.3d 934, 943 (9th Cir. 2015) (“incentive awards...do not, by themselves, create an impermissible conflict between class members and their representatives”).



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*Counsel for Co-Lead Plaintiffs and  
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[Additional Counsel on Signature Page]

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

Master File No. 3:20-CV-06733-MMC

IN RE AIMMUNE THERAPEUTICS, INC.  
SECURITIES LITIGATION

**DECLARATION OF JUAN E.  
MONTEVERDE IN SUPPORT OF  
CO-LEAD PLAINTIFFS' MOTION FOR AN  
AWARD OF ATTORNEYS' FEES AND  
EXPENSES AND AWARDS TO CO-LEAD  
PLAINTIFFS PURSUANT TO  
15 U.S.C. § 78u-4(a)(4)**

Hearing: July 18, 2025

Time: 9:00 a.m.

Court: Courtroom 7, 19th Floor

Judge: Hon. Maxine M. Chesney

1 I, Juan E. Monteverde, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of New York and am  
3 admitted to practice *pro hac vice* before this Court. I am the Founder and Managing Partner at the  
4 law firm Monteverde & Associates PC, Co-Lead Counsel for Co-Lead Plaintiffs Cecelia Pemberton,  
5 Bruce Svitak, and Barbara Svitak in the Action, and Court-appointed Class Counsel.

6 2. I submit this declaration in support of Co-Lead Plaintiffs' Motion for an Award of  
7 Attorneys' Fees and Expenses and Awards to Co-Lead Plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4).

8 3. I have personal knowledge of the facts set forth herein and if called as a witness, could  
9 and would testify competently to these facts under oath.

10 4. During the course of the Action, Defendants and third parties produced and Class  
11 Counsel reviewed more than 313,000 pages of discovery documents, including e-mails, board  
12 materials, financial data and projections, analyst reports, and other Merger-related documentation.  
13 The parties conducted 19 fact and expert witness depositions. All three Co-Plaintiffs sat for  
14 depositions and produced documents to Defendants. Plaintiffs also prepared and mailed surveys to  
15 approximately 2,104 potential class members regarding the importance of the facts at issue in the  
16 case to the average reasonable investor. In addition, the parties engaged respective experts. Plaintiffs  
17 retained William Jeffers, CFA of the Griffing Group, and Defendants engaged Paul A. Gompers.  
18 Both experts filed extensive opening and responsive reports, and both experts were deposed.

19 5. On September 24, 2024, the parties participated in a mediation before David M.  
20 Murphy of Phillips ADR Enterprises, P.C. By the time the parties participated in the mediation, fact  
21 and expert discovery was complete, and both parties had fully briefed and opposed respective motions  
22 for summary judgment and *Daubert* motions. In connection with the mediation, the parties provided  
23 the mediator with mediation statements and presentations. While the parties were not able to reach a  
24 settlement at the mediation, the parties continued their discussions with the assistance of Mr. Murphy.  
25 On October 31, 2024, at the request of the parties, the hearing on the summary judgment and *Daubert*  
26 motions was rescheduled to November 8, 2024, to allow the parties to focus on ongoing settlement  
27 negotiations. On November 7, 2024, after further negotiations, the parties accepted a double-blind  
28

1 mediator's proposal and reached an agreement in principle to resolve the Litigation, subject to Court  
2 approval.

3         6. Through the mediation process, the strengths and weaknesses of the parties' claims  
4 and defenses were extensively debated; negotiations were hard-fought; and Plaintiffs and Class  
5 Counsel were thus well-positioned to evaluate the strengths and weaknesses of the claims and  
6 defenses, as well as the fairness of the Settlement. On November 7, 2024, after further negotiations,  
7 the parties accepted a mediator's proposal and reached an agreement in principle to resolve the  
8 Litigation, subject to Court approval. Thereafter, the parties memorialized the terms of the Settlement  
9 in the Stipulation.

10         7. While Plaintiffs remained confident in their ability to ultimately prove their claims at  
11 trial, Defendants advanced several credible arguments regarding both liability and damages. For  
12 example, Defendants argued the Recommendation Statement was not false and misleading because  
13 it informed stockholders that the Company's projections had been reduced and included the impact  
14 of the maintenance duration assumption on the share price in an amendment to the Recommendation  
15 Statement. *See* ECF No. 162 at 10-16 (Defendants' Motion for Summary Judgment). They likewise  
16 argued that, because Palforzia had not reached commercialization at the time of the Merger, the  
17 maintenance duration assumption was necessarily an uncertain extrapolation made from a small  
18 number of clinical trials, and that Plaintiffs had not adduced evidence that Defendants intended to  
19 deceive investors regarding this assumption. *Id.* Defendants also argued that Plaintiffs could not  
20 support their claim that Dr. Dallas intentionally manipulated the projections, as he had every incentive  
21 to maximize his own proceeds in the Merger. *Id.* at 18-19. Simply put, establishing Defendants'  
22 liability at summary judgment or trial would be difficult and complex, with success far from certain.

23         8. Even more concerning were Defendants' arguments regarding, and Plaintiffs' unique  
24 hurdle of proving, economic loss in a Section 14 case such as this one. Even if liability had been  
25 established, Defendants had numerous challenges to loss causation and damages, including the fact  
26 that Aimmune stockholders received a 174% premium for their Aimmune shares through the Merger,  
27 and that there was no higher offer on the table. ECF 162 at 20-22; ECF 163. Indeed, based in part on  
28

1 these facts, in a motion pending before the Court at the time of the Settlement, Defendants sought to  
2 exclude vast swaths of Plaintiffs' valuation expert's opinions that, if granted, may have  
3 singlehandedly rendered it impossible for Plaintiffs to prove damages at trial. ECF 163. Perhaps most  
4 compelling of all, though, was Defendants' argument that Nestle had sold Aimmune's primary  
5 product at a substantial loss and essentially written off the value of the acquisition *while this case was*  
6 *pending*. Had that single fact made its way before the jury, a jury may well have found that Plaintiffs  
7 and the Class not only suffered no loss at all, but that Nestle in fact overpaid for Aimmune to begin  
8 with.

9         9. Moreover, while the Class had already been certified by the Court, Rule 23(c)(1)  
10 provides that a class certification order may be altered or amended at any time prior to a decision on  
11 the merits, such that there was an ongoing risk that any certified class could have been disturbed on  
12 appeal or if Defendants successfully moved to decertify the Class. And, even if Plaintiffs prevailed  
13 at a trial, Defendants would almost certainly file an appeal – a process that would further extend the  
14 litigation for years and risk reversal of any verdict. Finally, barring the Settlement, this case would  
15 require the expenditure of substantial time and money for trial and beyond, with no guarantee that  
16 any additional benefit would be provided to the Settlement Class, and with the risk that the Class  
17 would receive nothing. As noted, at the time the Settlement was reached, Defendants' motion for  
18 summary judgment sought dismissal of all claims. Conversely, the Settlement confers a substantial  
19 and immediate benefit and avoids the risks associated with obtaining a wholly speculative (though  
20 potentially larger) sum in the future. In sum, Class Counsel believes the Settlement balances the  
21 risks, costs, and delay inherent in complex cases, is a meaningful recovery, and thus merits  
22 preliminary approval.

23         10. Here, the \$27.5 million recovery represents (1) 28.9% of damages based on  
24 Aimmune's 52-week high share price (which represented an aggregate plausible damages amount of  
25 \$95 million) and (2) 13.7% of the maximum theoretical aggregate damages of \$201.2 million  
26 calculated by Plaintiffs' expert, assuming Plaintiffs prevailed on *all* claims against Defendants.  
27 Assuming 100% of the shares in the Settlement Class submit a valid and timely Proof of Claim, the  
28

1 average distribution will be approximately \$0.60 per share owned (before the payment of Court-  
2 approved fees and expenses (estimated to be approximately \$0.20 per share) and the cost of notice  
3 and claims administration). This proposed Settlement recovery is in line with and exceeds recent  
4 comparable class action settlements and is a very good result for any stage of the litigation. *See*  
5 Exhibit 1 attached hereto.

6 11. As such, Class Counsel believe the Settlement is fair, reasonable and adequate, and in  
7 the best interest of the Settlement Class. While Plaintiffs believe they have meritorious claims and  
8 would have prevailed at trial, there remains a substantial risk that Defendants could prevail on one or  
9 more of their arguments. Defendants have denied, and continue to deny, each and all of the claims  
10 and contentions asserted by Plaintiffs. Plaintiffs believe it is in the interest of the Settlement Class to  
11 offset these risks by settling at this phase of the litigation.

12 12. Class Counsel are well-equipped to understand the complexities and risks associated  
13 with Section 14 cases.

14 13. Class Counsel's compensation for services rendered in this Litigation was wholly  
15 contingent on the success of the Action. Class Counsel are seeking attorney's fees of one-third of the  
16 settlement, which equates to \$9,166,667. These attorneys' fees have not been paid from any source  
17 to Class Counsel and have not been the subject of any prior request, or prior award, in any litigation  
18 or other proceeding.

19 14. Both Monteverde & Associates PC ("M&A") and Kahn Swick & Foti, LLC ("KSF")  
20 are boutique securities firms, and litigating this Action required the devotion of a significant amount  
21 of their finite resources and the foregoing of other opportunities. The Chart below summarizes the  
22 work performed by my firm in connection with the prosecution of this Action. My firm has accrued  
23 3,846.90 attorney hours, representing a total lodestar of \$2,907,215.00 during the pendency of the  
24 Action:

PROFESSIONAL	HOURS	RATE	LODESTAR
Juan E. Monteverde (Managing Partner)	1,128.70	\$1,025.00	\$1,156,917.50
Miles Schreiner (Senior Associate)	1,160.90	\$850.00	\$986,765.00
Beth Keller (Of Counsel)	53.70	\$800.00	\$42,960.00
David E. Bower (Of Counsel)	111.50	\$800.00	\$91,987.50
John Baylet (Associate)	31.70	\$575.00	\$18,227.50
Jonathan Lerner (Associate)	664.60	\$525.00	\$348,915.00
Jordan Steele (Associate)	143.30	\$475.00	\$68,067.50
Bejamin Vanderhyden (Associate)	552.50	\$350.00	\$193,375.00
<b>TOTALS</b>	<b>3,846.90</b>		<b>\$2,907,215.00</b>

15. My firm's billing records are attached hereto as Exhibit 7. The lodestar was calculated based on my firm's regular hourly billing rates and was prepared from time records regularly prepared and maintained by my firm. The time reflected was reasonably and necessarily expended.

16. The hourly rates for my firm are the usual and customary hourly rates charged for our services in similar litigation. My firm determined the hourly rates after careful consideration, including a survey of the prevailing market rates charged for mergers and acquisitions and securities litigation. These rates are also in line with hourly rates accepted in this District. *Fleming v. Impax Laby's Inc.*, 2022 U.S. Dist. LEXIS 125595, at \*28 (N.D. Cal. July 15, 2022) (approving hourly rates of \$760 to \$1,325 for partners, \$895 to \$1,150 for counsel, and \$175 to \$520 for associates, and noting that such "billing rates [are] in line with prevailing rates in this district for personnel of comparable experience, skill, and reputation"); *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, 2020 U.S. Dist. LEXIS 129939, at \*102 (N.D. Cal. July 22, 2020) (approving hourly rates of \$490 to \$975 for partners and from \$310 to \$800 for non-partners); *Hefler v. Wells Fargo & Co.*, 2018 U.S. Dist. LEXIS 213045, at \*39 (N.D. Cal. Dec. 18, 2018) (finding rates ranging from \$650 to \$1,250 for partners or senior counsel and from \$400 to \$650 for associates as reasonable); *see also Ziegler v. GW Pharm., PLC*, No. 21-cv-1019-

BAS-MSB, 2024 U.S. Dist. LEXIS 52979 (S.D. Cal. Mar. 25, 2024) (finding M&A's and KSF's hourly rates reasonable in less expensive Southern District of California).

17. Additionally, Class Counsel is seeking reimbursement of certain expenses incurred in connection with the Action. A summary of the expenses incurred by my firm for which we are seeking reimbursement is detailed below:

CATEGORY	AMOUNT
Court Filing Fees (including <i>Pro Hac Vices</i> )	\$1,673.00
Courier, Overnight Delivery and USPS (including returned env.)	\$3,840.13
Court Transcripts	\$40.95
Consultant and Expert Fees	\$98,441.00
Deposition Transcripts and Expenses	\$25,518.56
eDiscovery Platform	\$12,277.57
Mediation Fees	\$20,228.75
Printer and Photocopies (including survey, depo exhibits, witness binders and chambers copies)	\$4,478.56
<b>TOTAL</b>	<b>\$166,498.52</b>

18. The expenses summarized above are supported by the books and records of my firm, which are prepared from expense vouchers, check records, or other documents, represent an accurate record of the expenses incurred in connection with this Litigation, and were reasonably necessary for the prosecution of this Action. Notably, Class counsel has excluded from its expense request the travel and lodging expenses incurred by M&A and KSF – a New York and New Orleans based firm – in prosecuting the Action. These expenses will be borne entirely by Class Counsel.

19. The declaration and billing records of Kahn Swick & Foti, LLC, the other Co-Lead Counsel/Class Counsel firm in this action, are attached hereto as Exhibit 8.

20. **As outlined therein and here, Class Counsel accrued a total 7,356 attorney and support staff hours, representing a total lodestar of \$5,748,037.50 to the present time, and Class Counsel incurred a total of \$325,088.72 in unreimbursed expenses in connection with this Action.**

21. Co-Lead Plaintiffs also seek reimbursement for the time and expenses they incurred relating to their representation of the Settlement Class in this Action in the amount of \$5,000 each (\$15,000 total). Attached hereto as Exhibits 4-6 are the Declarations of Co-Lead Plaintiffs Cecelia Pemberton, Bruce Svitak, and Barbara Svitak.

22. Exhibits. Attached hereto are true and correct copies of the following exhibits:

- Exhibit 1:** Comparable Cases Chart
- Exhibit 2:** Firm Resume of Monteverde & Associates PC
- Exhibit 3:** Firm Resume of Kahn Swick & Foti, LLC
- Exhibit 4:** Declaration of Ceceila Pemberton
- Exhibit 5:** Declaration of Bruce Svitak
- Exhibit 6:** Declaration of Barbara Svitak
- Exhibit 7:** Billing records of Monteverde & Associates PC
- Exhibit 8:** Declaration and billing records of Kahn Swick & Foti, LLC

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

Executed on May 2, 2025

/s/ Juan E. Monteverde

Juan E. Monteverde



# EXHIBIT 1

Case Name	<i>Ziegler v. GW Pharmaceuticals plc</i> Case No. 3:21-cv-01019-BAS-MSB (S.D. Cal. 2024)	<i>Karri v. Oclaro, Inc.</i> , 18-cv-3435-JD (N.D. Cal. 2024)	<i>Baum v. Harman Int'l</i> , 17-cv-00246-RNC (D. Ct. 2022)	<i>In re Envision Healthcare Corp.</i> , 18-cv-01068-RGA-SRF (D. Del. 2021)	<i>NECA-IBEW Pension Trust Fund v. Precision Castparts Corp</i> , 16-cv-01756-YY (D. Or. 2021)	<i>Aimmune</i>
Common Fund Amount	\$7.75m	\$15.25m	\$28m	\$17.4m	\$21m	\$27.5m
Number of Shares Held by Class	396m	167.5m	69m	120m	133m	46m
Market Cap / Price Per Share	\$6.81b / \$220 p/ADS	\$1.8b / \$8.62 p/s	\$5.5b / \$111.50 p/s	\$9.9b / \$46 p/s	\$37b / \$235 p/s	\$2.5b / \$34.50 p/s
Average Recovery Per Share	\$0.25	\$0.09	\$0.40	\$0.14	\$0.16	\$0.60
Number of Notices Sent/Notice Methods	37,508 mail/newswire/newspaper	54,126 mail/newswire/email	37,910 mail/newswire/WSJ	32,504 mail/newswire	117,513 mail/newswire/WSJ	Expected 20,000
Claims Rate/No. of Shares that Filed Claim	72% / 284m	83% / 139m	Distribution ongoing	88% / 105m	Not available	At least 60% - estimated
Average Net Recovery based on Notices Sent	\$207	\$177	\$500	\$340	\$119	Approx. \$890
<i>Cy Pres</i>	Federal Judicial Center Foundation	TBD	Undisclosed Not for Profit	Federal Judicial Center Foundation	Undisclosed Not for Profit	Bay Area Financial Education Foundation
Admin. Costs	\$195k	\$165k	Not available	\$258k	Not available	\$93k
Attorneys' Fees & Expenses	1/3 of fund and \$33,513.97 exp.	1/3 of fund and \$397,680.55 exp.	31% of fund and \$123,809.79 exp.	1/3 of fund and \$25,904.80 exp.	1/3 of fund and \$867,891.13 exp.	Proposed 1/3 of fund and up to \$450k exp.
Alleged Damages	\$600m	\$196m-599m	Undisclosed	\$120m-\$180m	\$1.596b-\$2.128b	\$95m – 201.2m
Claims Released	All claims relating to action and acquisition	All claims relating to action, merger, merger disclosures	All claims relating to alleged facts, merger or proxy	All claims relating to alleged facts, merger or proxy	All claims relating to alleged facts, merger or proxy	All claims relating to action, merger, merger disclosures

# **EXHIBIT 2**

MONTEVERDE & ASSOCIATES PC  
— ATTORNEYS AT LAW —

***Firm Résumé***

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**Fax: (212) 202-7880**

# MONTEVERDE & ASSOCIATES PC

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## ATTORNEYS AT LAW

Monteverde & Associates PC was founded in 2016 and is a national class action law firm committed to protecting shareholders from corporate wrongdoing. The firm has significant experience litigating Mergers & Acquisitions and Securities Class Actions, protecting investors, and recovering damages. The legal team at the firm is passionate about all its cases and works tirelessly to obtain the best possible outcome for its clients and all shareholders. The firm is recognized as a preeminent securities firm listed in the Top 50 in the 2018-2022 ISS Securities Class Action Services Report.

The attorneys at Monteverde & Associates have been involved in a number of cases recovering substantial amounts of money for shareholders or investors, including the selected cases below:

TARGET COMPANY ACQUIRED	INCREASED CONSIDERATION OR SETTLEMENT FUND
Aimmune (pending final approval)	\$27.5 million
Anworth (2023)	\$3 million
American Capital (2018)	\$17.5 million
Apollo Education (2017)	\$54 million
ClubCorp (2019)	\$5 million
Comverge (2017)	\$5.9 million
Covisint (2024)	\$9 million
Education Realty Trust (2022)	\$10 million
Envision Healthcare (2021)	\$17.4 million
Force Protection (2012)	\$11 million
GW Pharmaceuticals (2024)	\$7.75 million
Hansen Medical (2019)	\$7.5 million
Harvest Capital (2024)	\$3.85 million
Jaguar Animal (2021)	\$2.6 million
Mavenir Systems (2016)	\$3 million
MRV Communications (2021)	\$1.9 million
Oclaro (2024)	\$15.25 million
Orchard Enterprises (2014)	\$10.725 million
Papa Murphy's Holdings (2022)	\$2.4 million
Syntroleum (2016)	\$2.8 million
Transgenomic (2020)	\$1.95 million
US Geothermal (2020)	\$6.5 million
West Marine (2020)	\$2.5 million

Monteverde & Associates has also changed the law in the 9th Circuit, by lowering the standard of liability under Section 14(e) of the Exchange Act from scienter to negligence to better protect shareholders. *Varjabedian v. Emulex Corp.*, 888 F.3d 399 (9th Cir. 2018). Thereafter, the firm preserved this victory (after oral argument) by obtaining dismissal of a writ of certiorari as improvidently granted at the United States Supreme Court. *Emulex Corp. v. Varjabedian*, 139 S. Ct. 1407 (2019).

# MONTEVERDE & ASSOCIATES PC

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ATTORNEYS AT LAW

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## **Juan E. Monteverde**

Mr. Monteverde is the founder and managing partner for the firm. Mr. Monteverde has over a decade of experience advocating shareholder rights. Mr. Monteverde regularly handles high profile M&A cases seeking damages or to maximize shareholder value and has obtained monetary relief for shareholders.

Mr. Monteverde has also broken new ground when it comes to challenging proxies related to compensation issues post Dodd-Frank Act. *Knee v. Brocade Comm's Sys., Inc.*, No. 1-12-CV-220249, slip op. at 2 (Cal. Super. Ct. Santa Clara Cnty. Apr. 10, 2012) (Kleinberg, J.) (enjoining the 2012 shareholder vote related to executive compensation proxy disclosures). Mr. Monteverde also argued successfully before the 9th Circuit to change the law and lowered the standard of liability under Section 14(e) of the Exchange Act from scienter to negligence to better protect shareholders. *Varjabedian v. Emulex Corp.*, 888 F.3d 399 (9th Cir. 2018).

Mr. Monteverde has been selected by Super Lawyers as a New York Metro Rising Star in 2013, 2017-2019 and a Super Lawyer in 2022-2024, and by Martindale-Hubbell as a Top-Rated Lawyer 2017-2024.

Mr. Monteverde has been a keynote speaker at ABA, PLI, ACI and other conferences regarding merger litigation or executive compensation issues. Below is a list of published articles by Mr. Monteverde:

- Fair To Whom? Examining Delaware's Fair Summary Standard
- A Review of Trados and Its Impact
- Emerging Trends in Say-on-Pay Disclosure
- Battling for Say on Pay Transparency

Mr. Monteverde graduated from California State University of Northridge (B.S. Finance) and St. Thomas University School of Law (J.D., *cum laude*), where he served as a Law Review Staff Editor.

Mr. Monteverde is admitted to practice law in the State of New York, 2007.

# MONTEVERDE & ASSOCIATES PC

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ATTORNEYS AT LAW

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## **David E. Bower**

Mr. Bower is of counsel with the firm since 2016 and has extensive experience in securities and consumer class actions as well as corporate litigation and complex commercial litigation matters.

Mr. Bower has been in the private practice of law since 1981. Prior to forming his own law firm, Law Offices of David E. Bower, in 1996, Mr. Bower practiced for two years with the law firm Hornberger & Criswell where he supervised and coordinated complex business litigation. From 1989 to 1994, he was a partner with the law firm Rivers & Bower where he handled business, construction, real estate, insurance, and personal injury litigation and business and real estate transactions. From 1984 to 1989, he practiced in the insurance bad faith defense and complex litigation department of the Los Angeles, California based law firm of Gilbert, Kelley, Crowley & Jennett. From 1981 to 1984, he practiced law in New York as a partner with the law firm Boysen, Scheffer & Bower. Mr. Bower has extensive trial experience and has tried over 100 cases.

Mr. Bower is a graduate of the Mediation Training Program at UCLA and has a certification in Advanced Mediation Techniques. He has presided in over 200 mediations since becoming certified and is currently on the Los Angeles Superior Court Pay Panel of mediators and arbitrators. He was previously the President of the Board of A New Way of Life Reentry Project, a non-profit serving ex-convicts seeking reentry into society as productive citizens.

Mr. Bower is admitted to practice law in the State of New York, 1982, and California, 1985.



# MONTEVERDE & ASSOCIATES PC

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## **Beth Keller**

Ms. Keller is of counsel with the firm since 2018 and has extensive experience in securities class actions as well as corporate governance reform.

For more than two decades, she has focused her legal practice on shareholder rights litigation. Prior to working with Monteverde & Associates, Ms. Keller was a Partner at Faruqi & Faruqi, LLP, a nationally recognized securities firm based in New York City, where she litigated shareholder class and derivative actions, and served as head of the firm's Shareholder Derivative Litigation Department. She later became a founding Member of the boutique securities firm, Hynes Keller & Hernandez, LLC, where she was involved in all aspects of the firm's shareholder advocacy practice.

Ms. Keller has extensive litigation experience and has served as lead or co-lead counsel in numerous complex cases in which she has achieved substantial corporate governance measures and/or financial recoveries for the corporation and its stockholders.

Ms. Keller is admitted to practice law in the State of New York, 2003 and New Jersey, 2002.

# MONTEVERDE & ASSOCIATES PC

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ATTORNEYS AT LAW

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## **Miles D. Schreiner**

Mr. Schreiner is a senior associate with the firm from its inception in 2016. He is experienced in securities and consumer class action litigation, and has been an integral part of litigation teams that have recovered tens of millions of dollars for shareholders and consumers across the country.

Mr. Schreiner also has significant experience in appellate litigation. Mr. Schreiner successfully argued before the U.S. Court of Appeals for the Eighth Circuit in *Campbell v. Transgenomic, Inc.*, 916 F.3d 1121 (8th Cir. 2019), where he obtained reversal of a district court's order dismissing a Section 14(a) action and prompted the Eighth Circuit to clarify the standard governing misleading statements under the Exchange Act. Moreover, in *Murphy v. Inman*, No. 161454, 2022 Mich. LEXIS 733 (Mich. Apr. 5, 2022), Mr. Schreiner obtained a landmark victory for shareholders by persuading the Michigan Supreme Court to hold that shareholders have standing to bring direct claims for breaches of fiduciary duty when challenging unfair cash-out mergers. And in *Varjabedian v. Emulex Corp.*, 888 F.3d 399 (9th Cir. 2018), Mr. Schreiner was a key member of the team that persuaded the Ninth Circuit to split from five other circuits and adopt a lower culpability standard for claims under Section 14(e) of the Exchange Act.

Mr. Schreiner has also had multiple legal articles published, set forth below:

- Fair To Whom? Examining Delaware's Fair Summary Standard
- The Delaware Courts' Increasingly Laissez Faire Approach To Directorial Oversight
- Money-Back Guarantees Unlikely to Satisfy 'Superiority'
- A Deadly Combination: The Legal Response to America's Prescription Drug Epidemic

Mr. Schreiner is a *cum laude* graduate of Brooklyn Law School, where he was a Dean's Merit Scholar and served as a Law Review Editor. He obtained his undergraduate degree in Political Science from Tulane University, where he graduated *cum laude*.

Mr. Schreiner has been selected by Super Lawyers as a New York Metro Rising Star for 2018-2022 and a Super Lawyer 2023-2024. He is admitted to practice law in the State of New York (2013) and New Jersey (2012).

# MONTEVERDE & ASSOCIATES PC

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ATTORNEYS AT LAW

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## **Jonathan T. Lerner**

Mr. Lerner is an experienced class action and civil litigation attorney who currently represents shareholders in cases nationwide.

Before joining the firm in 2021, Mr. Lerner worked for a real estate and commercial litigation firm. He has a successful track record in New York State appellate courts on novel points of law and also has transactional experience in a variety of real estate and commercial contexts.

Mr. Lerner is a graduate of St. John's University School of Law, where he was a St. Thomas More Scholar. He obtained his undergraduate degree in Philosophy from the University of St Andrews in Scotland, where he graduated with First Class Honors, the highest academic honor conferred by universities in the United Kingdom.

Mr. Lerner is admitted to practice law in the State of New York, 2019.

# MONTEVERDE & ASSOCIATES PC

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ATTORNEYS AT LAW

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## **Benjamin P. Vanderhyden**

Benjamin Vanderhyden started at Monteverde & Associates in January 2023 as a law clerk and is now an associate at the firm.

Mr. Vanderhyden graduated from the University of California, Santa Barbara (B.A. Public Policy Analysis) in 2020 and from Brooklyn Law School (J.D.) in 2023. During law school, he worked as a research assistant, providing analysis regarding state laws on limited liability entities. Additionally, he received the Dean's Merit Scholarship and the Professor Philip K. Yonge Memorial Prize for academic achievement in the study of Commercial and Bankruptcy Law.

Mr. Vanderhyden is admitted to practice law in the State of New York, 2024.

# MONTEVERDE & ASSOCIATES PC

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ATTORNEYS AT LAW

## **Carter Overbey**

Carter Overbey is a recent law school graduate working as a law clerk in the firm. Mr. Overbey joined the firm as a law clerk last year in law school. Mr. Overbey graduated from Furman University (B.A. Economics and Spanish) in 2020 and graduated *Cum Laude* from Brooklyn Law School (J.D.) in 2024. During his time at Brooklyn Law School Mr. Overbey received the Dean's Merit Scholarship.

Mr. Overbey passed the New York State Bar in July 2024 and is awaiting admission.

# EXHIBIT 3



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*\* For representative purposes only.*



## Kahn Swick &amp; Foti, LLC

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Kahn Swick &amp; Foti, LLC

## The Firm

Kahn Swick & Foti, LLC (“KSF”) ([www.ksfcounsel.com](http://www.ksfcounsel.com)) is a boutique law firm with offices in New York City, Delaware, San Francisco, Chicago, New Orleans, New Jersey, and a representative office in Luxembourg<sup>1</sup>. KSF focuses predominantly on class actions, in the areas of securities and mergers & acquisitions, and on shareholder derivative and other complex litigation. Since its inception in 2000, KSF has recovered hundreds of millions of dollars for its clients.

KSF’s Lawyers have extensive experience litigating complex cases in the following practice areas: (i) securities litigation; (ii) corporate governance and derivative litigation; (iii) consumer protection litigation; (iv) shareholder merger and acquisition class action litigation; and (v) antitrust litigation. A sampling of the firm’s current cases and recent recoveries is set forth below.

*“[Kahn Swick & Foti] earned my unyielding admiration and respect in this case for the efficient and exceptionally reasonable way in which they found a prompt, fair, and equitable solution to the complex problems their clients faced...”*

Hon. Mark W. Bennett,  
United States District Judge  
In Re: Elgaouni v. Meta Financial Group,  
Inc.

## Securities Litigation

### SETTLED CASES

*In re Petrobras Securities Litigation*, No. 1:14-cv-9662 (S.D.N.Y.). Member of Plaintiffs’ Steering Committee for the Individual Actions (“PSC”), federal securities class action against Brazil’s state-controlled petrochemical company arising from “Operação Lava Jato,” the largest corruption scandal in the history of Latin America, whereby Plaintiffs alleged Defendants deliberately overpaid on various construction contracts in return for kickbacks. The Class action settled in 2018 for **\$3 billion** and, as a member of the PSC, KSF was found by the Court to have “made a substantial contribution to the class,” June 22, 2018 Opinion and Order at 39 (D.E. 834).

<sup>1</sup> For representative purposes only.

**Kahn Swick & Foti, LLC**

**Dicker v. TuSimple Holdings, Inc. et al.**, NO. 22-CV-1300 (S.D. Cal.). *Co-Class Counsel*. On December 18, 2024, the Hon. Roger T. Benitez entered a Final Judgment approving a **\$189 million** settlement of the Class's claims. KSF obtained this extraordinary result – the largest ever settlement of a securities class action in the Southern District of California – after filing a detailed and thorough consolidated complaint, opposing seven separate motions to dismiss, negotiating an agreement with TuSimple to prevent the dissipation of its U.S. assets, and moving for a temporary restraining order to ensure that TuSimple's cash remained in the U.S.

**Pearlstein v. Blackberry Ltd., et al.**, No. 1:13-CV-07060-CM (S.D.N.Y.). *Lead Counsel*. The Hon. Colleen McMahon, United States District Judge for the Southern District of New York, entered a Final Judgment in this federal securities class action, approving a **\$165 million** settlement between Lead Plaintiffs, represented by Lead Counsel KSF, and BlackBerry, Limited. The settlement, one of the largest securities litigation recoveries of 2022 and achieved on the eve of trial, resolved Plaintiffs' claims that BlackBerry made materially false and misleading statements and omissions regarding the sales of, and accounting relating to, its BB10 smartphones.

**Erica P. John Fund, Inc. v. Halliburton Co., et al.**, No. 3:02-cv-1152 (N.D. Tex.). *Co-Class Counsel*, federal securities class action against oilfield services company and a high-level officer, in which Class Counsel obtained a unanimous decision by the U.S. Supreme Court in *Erica P. John Fund, Inc. v. Halliburton Co., et al.*, 563 U.S. 804 (2011) vacating and remanding a decision of the Fifth Circuit, and then successfully defeated Defendants' attack on the *Basic v. Levinson* presumption of reliance in *Halliburton Co. v. Erica P. John Fund, Inc.*, 134 S. Ct. 2398 (2014). These two Supreme Court decisions led to certification of the class, and ultimately resulted in a cash settlement of **\$100 million** for investors.

**In re Chicago Bridge & Iron Secs. Litig.**, Case No. 1:17-cv-1580-LGS (S.D.N.Y.). On August 2, 2022, the Hon. Lorna G. Schofield, United States District Judge for the Southern District of New York, entered a Final Judgment in this federal securities class action, approving a **\$44 million** settlement obtained by Plaintiffs and KSF, as Lead Counsel, against a large engineering, procurement, and construction company, and certain officers and directors. The lawsuit alleged that Defendants made materially false and misleading statements and omissions regarding the performance of, and accounting relating to, CBI's nuclear business.

**Farrar v. Workhorse Group, Inc., et al.**, No. 2:21-cv-02072-CJC-PVC (C.D. Cal.). On July 28, 2023, after more than two years of hard-fought litigation, the Hon. Cormac J. Carney entered a Final Judgment approving a **\$35 million** settlement of the Class' claims. Lead Counsel KSF achieved this excellent result after defeating Defendants' motion to dismiss and engaging in substantial fact discovery.

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***Moradpour v. Velodyne Lidar, Inc., et al.***, No. 3:21-cv-01486-SI (N.D. Cal.), Lead Counsel, federal securities class action against a company that develops and markets lidar solutions for autonomous vehicles, driver assistance, delivery, robotics, navigation, mapping, and other uses, resulting in an all-cash settlement of **\$27.5 million** for investors.

***Dr. Joseph F. Kasper, et. al. v. AAC Holdings, Inc., et. al.***, 3:15-cv-00923 (Consolidated) (M.D. Tenn.). Co-Lead Counsel, federal securities class action against a for-profit substance abuse treatment provider, and certain officers and directors, arising from Defendants' misleading statements regarding a criminal investigation into the death of a patient, resulting in a settlement of **\$25 million** for investors.

***In re Virgin Mobile USA IPO Litigation***, 2:07-cv-05619-SDW-MCA (D.N.J.), Co-Lead Counsel, federal securities IPO-related class action against a company providing wireless communication services, certain officers and directors, certain controlling shareholder entities, and Virgin's underwriters, resulting in a cash settlement of **\$19.5 million** for investors.

***Dougherty v. Esperion Therapeutics, Inc., et al.***, No. 2:16-cv-10089 (E.D. Mich.). Co-Lead Counsel, federal securities action against a pharmaceutical company and its chief executive officer, arising from misleading statements assuring the market that its sole drug candidate would not require a completed (and costly) cardiovascular outcomes trial prior to approval, resulting in a settlement of **\$18.25 million** for investors.

***In Re Eletrobras Securities Litigation***, Case No. 1:15-cv-05754 (Consolidated) (S.D.N.Y.). Co-Lead Counsel, federal securities class action against Centrais Eletricas Brasileiras S.A. and several of its former directors and officers, by U.S. investors after the company reported large losses related to a sprawling corruption scandal in Brazil. Nearly three years of protracted litigation resulted in a settlement of **\$14.75 million** for investors.

***Abramson v. NewLink Genetics Corp., et al.***, 1:16-cv-03545-AJN (S.D.N.Y.). Lead Counsel, federal securities action against a pharmaceutical company and certain officers arising from Defendants' misleading statements regarding the about the scientific literature and the design of their clinical trial for a pancreatic cancer treatment candidate, resulting in a settlement of **\$13.5 million** for investors.

***In re Tesco PLC Securities Litigation***, 14 Civ. 8495 (RMB) (S.D.N.Y.), Lead Counsel, federal securities class action against one of the world's largest grocery and general merchandise retailers based in the U.K., resulting in an all-cash settlement of **\$12 million** for investors in ADRs and F shares in the United States.

## Corporate Governance and Derivative Litigation

### SETTLED CASES

***Orrego v. Lefkofsky (Groupon, Inc. Derivative Litigation)***, No. 12 CH 12420 (Ill. Cir. Ct, Cook Cnty., Ch. Div.). KSF acted as Co-Lead Counsel in the consolidated shareholder derivative action filed in the Chancery Division of the Cook County Circuit Court in Illinois, which was brought derivatively on behalf of Groupon, Inc. against certain of its current and former directors and officers for allegedly breaching their fiduciary duties by, among other things, causing Groupon to issue or make materially false and misleading statements and failing to implement necessary controls over Groupon's accounting function. KSF facilitated a settlement comprising of comprehensive corporate governance reforms with an estimated value of **\$159 million**, including changes to the Compensation Committee Charter, implementation of director education requirements, enhanced Independent Director meeting obligations, augmentations to the Audit Committee and Disclosure Committee rules and procedures, creation of a new Director of Compliance position, and the retention of an independent auditing firm to conduct an assessment of the company's internal audit department.

***In re Bank of America Corp. Securities, Derivative, & Employment Retirement Income Security Act (ERISA) Litigation***, 09 Civ.580 (DC) (S.D.N.Y.). KSF served as court appointed Co-Lead Counsel in the Southern District of New York, and sued current and former executive officers and directors of the company, on behalf of shareholders. The substance of this action focused on Bank of America's January 1, 2009, acquisition of Merrill Lynch & Co., Inc. in a stock-for-stock transaction. This action alleged, among other things, that certain material information was omitted from the proxy statement filed with the Securities and Exchange Commission and mailed to stockholders on November 3, 2008. This proxy was critical in allowing defendants to obtain shareholder consent for the issuance of shares necessary to consummate the Merger. KSF was successful in resolving this action after defeating motions to dismiss by multiple defendants. In addition to major corporate governance reforms, KSF was also able to recover over **\$62.5 million** for the company.

***Bassett Family Trust v. Costolo, et al. (Twitter, Inc. Derivative Litigation)***, C.A. No. 2019-0806 (Del. Ch.). As counsel for the plaintiff in this demand wrongfully-refused shareholder derivative action, KSF brought breach of fiduciary claims derivatively on behalf of Twitter, Inc. ("Twitter") against certain of its current and former directors and officers for breaches of duties involving false and misleading statements about Twitter's user engagement and growth and for insider trading. Plaintiffs were able to secure a settlement providing that Twitter's board of directors will pay **\$38 million** in cash to Twitter.

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Twitter's board will also adopt a series of corporate governance reforms, which include (among other things): (i) enhanced board independence and oversight reforms, including amendments to the charters for the Disclosure Committee and the Audit Committee; (ii) enhancements to oversight of corporate strategy and risk, internal controls, and disclosures, including the creation of the Independent Chief Compliance Officer; and (iii) enhancements to corporate policies regarding compliance training, compensation, insider trading, and recapture of cash-based incentive compensation.

***In re Barnes & Noble Stockholder Derivative Litigation***, C.A. No. 4813 (Del. Ch.). As Co-Lead Counsel in this shareholder derivative action filed in the Court of Chancery of the State of Delaware on behalf of Barnes & Noble, Inc. against certain of its officers and directors, including Chairman Leonard Riggio, related to the company's 2009 acquisition of Mr. Riggio's private company Barnes & Noble College Booksellers, Inc., alleging that the purchase price, and the process by which it was agreed to, was not entirely fair to Barnes & Noble, Inc. and harmed shareholders, KSF helped obtain a settlement resulting in the recovery of **\$29 million** for Barnes & Noble, Inc. in the form of reductions to the principal and interest payable to Mr. Riggio.

***Weil v. Baker (ArthroCare Corporation Derivative Litigation)***, No. 08-CA-00787 (W.D. Tex.). As Co-Lead Counsel in the consolidated federal derivative action on behalf of ArthroCare Corporation against certain of its officers and directors arising from alleged improprieties in the company's marketing of spine wands, KSF helped obtain a cash settlement of **\$8 million**, along with important corporate governance changes.

***In re Fitbit, Inc. Stockholder Derivative Litigation***, Consolidated C.A. No. 2017-0402 (Del. Ch.). As Co-Lead Counsel in this shareholder derivative action filed in the Court of Chancery of the State of Delaware on behalf of Fitbit, Inc. ("Fitbit") against certain of its officers and directors, KSF alleged that certain insiders made stock sales in the company's initial public offering and—after agreeing to release the insiders from lock-up agreements that barred them from trading for 180 days after the initial public offering—an early secondary offering, taking take advantage of an artificially positive market response to Fitbit's flagship PurePulse heartrate monitoring technology. KSF was successful in resolving this action after defeating the defendants' motion to dismiss, recovering **\$5 million** for Fitbit.

***In re Conduent Incorporated Shareholder Derivative Litigation***, Lead Case No. 650903/2021 (N.Y. Sup. Ct., N.Y. Cnty., Ch. Div.). KSF acted as Co-Lead Counsel in the consolidated shareholder derivative action filed in the New York Supreme Court, New York County, which was brought derivatively on behalf of Conduent Incorporated against certain of its current and former directors and officers for allegedly breaching their fiduciary duties by (i) failing to oversee its electronic tolling line of business, resulting in



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finances, government complaints, and revenue withholding and (ii) causing the Company to make materially false and misleading statements in press releases and SEC filings about the known issues with its legacy information technology infrastructure that was impacting the Company's financial guidance and growth. KSF facilitated a settlement comprising of robust and fulsome corporate governance reforms, including Board refreshment, formation of the Corporate Social Responsibility and Public Policy Committee, separation of the Chief Executive Officer and Chairperson positions, enhancements to the duties and responsibilities of the Audit Committee regarding financial reporting and internal controls, creation of a Board-level Risk Oversight Committee, addition of the Chief Risk Officer to the management-level Disclosure Committee, adoption of an enhanced Amended Compensation Recoupment Policy.

***In re FAB Universal Corporation Shareholder Derivative Litigation***, Lead Case No. 14-cv-687 (S.D.N.Y.). As sole Lead Counsel in this consolidated action, KSF brought breach of fiduciary claims derivatively on behalf of FAB Universal Corporation against certain of its current and former directors and officers. Claims brought included breaches of duties of loyalty, due care, good faith, independence, candor and full disclosure to shareholders; misappropriation of material, non-public information of the Company by certain individual defendants; and violations of Section 14(a) of the Securities Exchange Act of 1934 and Rule 14a-9 promulgated thereunder. The action focused on defendants' publication of false and misleading statements concerning the Company's kiosk business in China, and the failure to disclose the issuance of \$16.4 million worth of bonds to Chinese investors in April 2013. KSF obtained a settlement involving numerous corporate governance reforms, including the creation of a new Disclosure Committee to put effective procedures and protocols in place and designed to ensure that all of the Company's public statements are vetted for accuracy, integrity and completeness. KSF was also able to cause the Company to modify the Charter of the Audit Committee to provide that at least one non-executive member of the Audit Committee has general expertise in accounting or financial management. Modifications were also caused to be made to the Company's Corporate Governance Committee and to the Company's Code of Conduct.

***In re Fifth Street Finance Corp. Stockholder Litigation***, Consolidated C.A. No. 12157 (Del. Ch.). As Co-Lead Counsel in this shareholder derivative action filed in the Delaware Court of Chancery on behalf of Fifth Street Finance Corporation ("FSC") against certain current and former directors of FSC, its investment advisor, Fifth Street Asset Management Inc. ("FSAM"), and current and former directors and officers of FSAM, KSF alleged that certain FSC and FSAM officers and directors caused FSC to pursue reckless asset growth strategies, to employ aggressive accounting and financial reporting practices, and to pay excessive fees under FSC's investment advisory agreement with FSAM, in order to inflate the perceived value of FSAM in the lead up to FSAM's initial public filing. KSF was instrumental in obtaining a

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settlement consisting of certain changes to FSC's investment advisory agreement and governance enhancements. The changes to the investment advisory agreement include a waiver by FSAM of fees equal to \$10 million and an acknowledgment that plaintiffs were a substantial and remedial factor in the reduction of base management fees from 2% to 1.75%. The governance enhancements include additional Board governance provisions, enhanced policies, practices and procedures regarding FSC's valuation of its investments, increased disclosure of relevant issues, and increased consultation with outside advisors and independent third parties.

***Lowry v. Basile (Violin Memory, Inc. Derivative Litigation)***, No. 4:13-cv-05768 (N.D. Cal.). As counsel for the plaintiff in this shareholder derivative action, KSF brought breach of fiduciary claims derivatively on behalf of Violin Memory, Inc. against certain of its current and former directors and officers for breaches of duties and waste of corporate assets. The action focused on defendants' publication of false and misleading statements concerning the Company's operating results and financial condition and alleged waste of corporate assets by granting outsized compensation to the CEO that was not in line with the performance of the Company. KSF obtained a settlement involving numerous corporate governance reforms, including the formalization of a Disclosure Committee to put effective procedures and protocols in place and designed to ensure that all of the Company's public statements are vetted for accuracy, integrity and completeness. KSF was also able to cause the Company to modify the Charter of the Compensation Committee to provide that the committee will create annual and long-term performance goals for the CEO, whose compensation will be based on whether those performance goals are achieved. Modifications were also caused to be made to the Company's Audit Committee and to the Company's Corporate Governance Guidelines.

***In re Moody's Corporation Shareholder Derivative Litigation***, No. 1:08-CV-9323 (S.D.N.Y.). As Lead Counsel for the demand-excused shareholder derivative actions filed on behalf of Moody's Corporation against current and former executive officers and directors of the company, asserting various claims, including for breach of fiduciary duty, in connection with, inter alia, Moody's credit ratings on various mortgage-backed securities, KSF helped obtain a settlement in which the settling defendants agreed that Moody's had implemented or will adopt, enhance and/or maintain certain governance, internal control, risk management and compliance provisions, designed to identify, monitor and address legal, regulatory and internal compliance issues throughout the business and operations of Moody's Investors Service, Inc., the credit rating agency operating subsidiary of the company.

***In re Morgan Stanley & Co., Inc. Auction Rate Securities Derivative Litigation***, No. 1:08-CV-07587 (S.D.N.Y.). As Lead Counsel for shareholders in this federal derivative action against a prominent broker-dealer to redress harms to the company from its sales and marketing of auction rate securities, KSF

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obtained substantial corporate governance reforms that promised to avoid a recurrence of similar harms in the future.

***In re Star Scientific, Inc. Virginia Circuit Court Derivative Litigation***, Lead Case No. CL13-2997-6 (Va. Cir. Ct., City of Richmond). KSF acted as court appointed Lead Counsel in the consolidated state court shareholder derivative action filed on behalf of Star Scientific, Inc. against certain current and former directors and officers. This action focused on defendants' false statements and misrepresentations concerning the Company's product Anatabloc. Specifically, the action stated that defendants had caused or allowed the Company concealed: (i) private placements and related-party transactions; (ii) government investigations of the Company; and (iii) a December 2013 warning letter from the U.S. Food and Drug Administration. In resolving this matter, KSF obtained sweeping corporate governance changes, including but not limited to, the creation of a new board-level committee to review and oversee the Company's legal, regulatory, compliance, and government affairs functions. KSF also caused the Company to modify the charter of the Audit Committee to strengthen disclosure oversight and risk management. Modifications were also caused to be made to the Company's Compensation Committee. The Company was caused to adopt a set of Corporate Governance Guidelines. A new Governance and Nominating Committee was created and the position of Compliance Officer tasked with oversight and administration of the Company's corporate governance policies was added. Changes were also made to the Company's Corporate Code of Business Conduct and Ethics.

## Consumer Protection Litigation

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### SETTLED CASES

***In re: General Motors Corp. Speedometer Products Liability Litigation***, MDL No. 1896, *Co-Lead Counsel*. Appointed co-lead counsel for national class of 4.2 million purchasers of certain GM trucks with defective speedometers. The case was resolved successfully by GM agreeing to fix defective speedometers for free and to reimburse class members for all past repair costs.

***Rose Goudeau, et. al. v. The Administrators of the Tulane Educational Fund, et. al.***, No. 2004-04758, Sec. 13, Div. J (Civil District Court for the Parish of Orleans), *Class Co-Counsel*. Nationwide class action certified on behalf of near relatives of individuals who donated their bodies to the Tulane Willed Body Program. The complaint alleged that the Tulane Willed Body Program sold the donated bodies and/or body parts to third parties. A settlement of **\$8,300,000** was obtained for the class members.

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**Barbara Thomas, et. al. v. ClearCredit, et. al.**, No. 03-2580 (E.D. La.). Co-Lead Counsel in national class action involving violations of the Fair Credit Reporting Act. Settled for approximately **\$6 million** in benefits to the consumer class along with injunctive relief.

**Sterling Savings Bank v. Poleline Self-Storage LLC**, No. CV-09-10872 (Idaho Dist. Ct.), *Class Counsel*. In this putative class action, a borrower alleged that the Bank improperly used the 365/360 method of interest calculation on several commercial loans. A settlement of **\$3.5 million** was recovered for bank customers.

## Shareholder M&A Class Action Litigation

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### SETTLED CASES

**Helen Moore v. Macquarie Infrastructure and Real Assets, et al. (Cleco Corporation Merger)**, No. 251,417 c/w Nos. 251,456; 251,515; 252,446; 252,458; and 252,459, (9th JDC, Louisiana). Co-Lead Counsel. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of utility company. Settlement consisted of **\$37 million** common fund, just one month from trial. Counsel also secured a landmark Louisiana appellate decision finding that merger-related challenges are direct, and not derivative, in nature.

**In re Saba Software, Inc. Stockholder Litigation**, Consol. Case No. 10697 (Delaware Court of Chancery 2015). *Member of Executive Committee*. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of software company. Settlement consisted of **\$19.5 million** common fund.

**In re American Capital, Ltd. Shareholder Litigation**, Case No. 422598-V (Circuit Court for Montgomery County, Maryland 2016). *Co-Lead Counsel*. Class action for breach of fiduciary duties to shareholders against both the target board and senior management and an activist investor fund (as a controller) relating to a proposed merger of a publicly traded private equity company. Settlement consisted of **\$17.5 million** common fund from the target's board and the activist investor.

**Kurt Ziegler, et al. v. GW Pharm., PLC, et al.**, No. 3:21-cv-01019-BAS-MSB (S.D. Cal). *Co-Lead Counsel*. Class action for breach of federal securities laws relating to a proposed merger of pharmaceutical company. Settlement consisted of **\$7.75 million** common fund.

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***Kenneth Riche, et al v. James C. Pappas, et al.***, C.A. No. 2018-0177 (Del. Ch). Co-Lead Counsel. Class action for breach of fiduciary duties to shareholders against the target board and activist investors relating to a proposed merger of a publicly traded geothermal company. Settlement consisted of **\$6.5 million** common fund, which represented a significant 7.7% premium to the \$84 million adjusted enterprise value of the merger to the non-defendants shareholders/class members.

***Rice v. Genworth Financial Incorporated, et al.***, Consol. Case No. 3:17-cv-00059 (Eastern District of Virginia 2017). Co-Lead Counsel. Class action for violation of Section 14(a) relating to a proposed merger of insurance company. Settlement consisted of additional material disclosures to proxy statements.

***Wojno v. FirstMerit Corp., et al.***, Case No. 5:16-cv-00461 (Northern District of Ohio 2016). Co-Lead Counsel. Class action for violation of Section 14(a) relating to a proposed merger of bank holding company. Settlement consisted of additional material disclosures to proxy statements.

***In re BTU International, Inc. Stockholders Litigation***, Consol. C.A. No. 10310-CB (Delaware Court of Chancery 2014). Co-Lead Counsel. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of electronics and solar goods companies. Settlement consisted of additional material disclosures to proxy statements. First known settlement to pass the exacting Trulia standards articulated by the Court of Chancery.

***In re EnergySolutions, Inc. Shareholder Litigation***, C.A. 8203 (Delaware Court of Chancery 2014). Plaintiff's Co-Lead Counsel. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of nuclear energy related companies worth \$1.1 billion (\$375 million in proposed shareholder consideration). Settlement consisted of \$0.40 price bump which increased the consideration to shareholders by more than 10% or approximately \$38 million. Settlement also included over 20 pages of additional disclosures to proxy statement relating to process and pricing claims.

***Hill v. Cohen, et al. (Summit Financial Services Group, Inc.)***, 2013 CA 017640 (15th Judicial Circuit Court, Florida). Co-lead Counsel. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of a financial services company. Contingent and delayed aspects of the proposed merger consideration, worth several million dollars, were accelerated and paid to shareholders ahead of schedule and settlement involved several pages of additional disclosures were made to the proxy statement.

***In re InSite Vision Inc. Consolidated Shareholder Litigation***, Lead Case No. RG-15774540 (c/w Case No. RG-15777471). Counsel for Plaintiffs. Class action for breach of fiduciary duties to shareholders relating

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to a proposed merger of medical companies. Litigation was followed by a public bidding war that resulted in a \$30 million increase in merger compensation.

***In re Medtox Scientific, Inc. Shareholders Litigation***, Court File No. 62-CV-12-5118 (Minnesota District Court 2013). *Plaintiffs' Lead Counsel*. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of medical technology companies. Settlement consisted of additional material disclosures to proxy statement.

***Heron v. International Rectifier Corporation, et al.***, Case No. BC556078 (Superior Court of the State of California, County of Los Angeles). *Co-Lead Counsel*. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of electronics companies. Settlement consisted of additional material disclosures to proxy statements.

***Sachs Investment Group v Sun Healthcare Group, Inc., et al.*** 30-2012-580354-CU-SL (Superior Court of the State of California 2013). *Plaintiffs' Counsel*. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of healthcare companies. Settlement consisted of additional material disclosures to proxy statement.

***In re Susser Holdings Corp. Stockholders Litigation***, C.A. 9613 (Delaware Court of Chancery 2014). *Co-Lead Counsel*. Class action for breach of fiduciary duties to shareholders relating to a proposed merger of convenience store and gas station companies. Settlement consisted of additional material disclosures to proxy statements regarding hidden value of individual distribution rights in limited partnership.

## Antitrust Litigation

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### RECENT VICTORIES

***Oliver, et al. v. American Express Company, et al.***, No. 1:19-cv-00566-NGG-SMG (E.D.N.Y.). On April 30, 2020, the Hon. Nicholas G. Garaufis, United States District Court Judge for the Eastern District of New York, entered an Order denying, in part, defendants' motion to dismiss. This matter, in which Kahn Swick & Foti, LLC is a member of Plaintiffs' Executive Committee, seeks damages, restitution, and injunctive relief against the American Express Company and American Express Travel Related Services Company, Inc. (collectively, "Amex"), on behalf of persons that used an electronic form of payment other than an Amex charge or credit card to purchase goods and services sold by merchants across the country at prices allegedly inflated by Amex's non-discrimination provisions. Judge Garaufis ruled that plaintiffs

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adequately pled violations of 22 state antitrust and/or consumer protection laws and allowed plaintiffs' case to proceed against Amex for these violations.

## Attorneys

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### PARTNERS

#### Lewis S. Kahn

Lewis Kahn is a founding partner of KSF and serves as the firm's managing partner. Mr. Kahn's practice is devoted to representing institutional and retail investors in connection with damages suffered as a result of securities fraud, breaches of fiduciary duties by corporate boards, and other egregious corporate conduct.



Mr. Kahn oversees the firm's securities practice, which has been responsible for settlements including the long-running securities class action against Halliburton where KSF was Co-Class Counsel with David Boies, a case in which the firm twice beat back [Halliburton's attempt in the United States Supreme Court to eviscerate shareholder rights](#), and obtained a **\$100 million** settlement for the Class after prior and subsequently replaced national securities counsel attempted to settle the case for \$6 million. Most recently, Mr. Kahn negotiated settlement of *Pearlstein v. BlackBerry Ltd., et al.*, No. 1:13-CV-07060-CM (S.D.N.Y.), for **\$165 million**, one of the largest securities litigation recoveries of 2022 and achieved on the eve of trial, resolving Plaintiffs' claims that BlackBerry made materially false and misleading statements and omissions regarding the sales of, and accounting relating to, its BB10 smartphones. Other matters have included *In re Virgin Mobile USA IPO Litigation*, 2:07-cv-05619-SDW-MCA (**\$19.5 million settlement**), *In re Tesco PLC Securities Litigation*, 14 Civ. 8495 (**\$12 million settlement**), *In re BigBand Networks, Inc. Securities Litigation*, 3:07-CV-05101-SBA (**\$11 million settlement**), *In re U.S. Auto Parts Networks, Inc. Securities Litigation*, 2:07-cv-02030-GW-JC (**\$10 million settlement**), *In re Bank of America Corp. Securities, Derivative, and Employment Retirement Income Security Act (ERISA) Litigation*, 09 Civ.580 (DC) (S.D.N.Y.) (**\$62.5 million** cash payment to Bank of America o/b/o Board), *In re Barnes & Noble Stockholder Derivative Litigation*, C.A. No. 4813-VCS (Del. Ch. Ct.) (recovery of **\$29 million** for Barnes & Noble, Inc. in the form of reductions to the principal and interest payable to CEO), and *In re EnergySolutions, Inc. Shareholder Litigation*, C.A. 8203-VCG (Del. Ch. 2014) (\$0.40 price bump which increased the consideration to shareholders by more than 10% or approximately **\$38 million**).



### Kahn Swick & Foti, LLC

In addition to securities lawsuits, Mr. Kahn has significant experience with consumer fraud and mass tort class actions. Mr. Kahn has been appointed to various leadership positions in federal class action litigation over the years.

Mr. Kahn holds a Bachelor's degree from New York University in 1990 and received a Juris Doctor from Tulane Law School in 1994. Mr. Kahn is a member of the Louisiana Bar and is licensed to practice in all Louisiana state courts, as well as the United States Supreme Court, the United States Courts of Appeal for the Second, Fifth and Ninth Circuits, and the United States District Courts for the Eastern, Middle and Western Districts of Louisiana.

### Michael A. Swick

Michael A. Swick is a co-founding partner of KSF and heads the firm's case starting department, overseeing case evaluation and initiation in the firm's securities, shareholder derivative and mergers & acquisitions practice groups. Prior to founding KSF, Mr. Swick had a distinguished career working at several of the nation's premiere class action litigation firms.



Relying on analytical skills honed at Tulane Law School and Columbia University's Graduate program of Arts & Sciences, throughout his career, Mr. Swick has played an important role in investigating large securities frauds and in developing and initiating litigations against the nation's largest corporations. Over his career, Mr. Swick has also participated in the litigation of cases that have resulted in hundreds of millions of dollars in recoveries for aggrieved shareholders and institutional investors.

Mr. Swick also works closely with the firm's institutional investor clients and participates in the management and development of KSF's portfolio monitoring systems.

In addition to his unique educational background, following law school, Mr. Swick also worked on the New York Mercantile Exchange, where he was involved first-hand, in the open-outcry trading of crude oil and natural gas futures and options contracts.

Mr. Swick received a Juris Doctor from Tulane Law School in 1994, and a Master of Political Philosophy from Columbia University Graduate School of Arts & Sciences in 1989 as well as a joint B.A. in Philosophy and Political Science from State University of New York at Albany in 1988. Mr. Swick was admitted to the State Bar of New York in 1997 and is admitted to practice before the United States District Court for the Southern District of New York, and the United States Supreme Court.

## Kahn Swick &amp; Foti, LLC

**Charles C. Foti, Jr.**

Charles C. Foti, Jr. served as the Attorney General for the state of Louisiana from 2004-2008, after serving for 30 years as one of the most innovative law enforcement officials in the United States as Orleans Parish Criminal Sheriff. Throughout his career, General Foti has remained committed to public service.



As Attorney General for the state of Louisiana, General Foti's achievements include:

- Recovering over **\$24 million** for Louisiana consumers in consumer fraud matters, **\$8 million** in anti-trust litigation, **\$9.1 million** for state employees through Office of Group Benefits, over **\$2 million** for auto complaints, over **\$33 million** in Medicaid Fraud.
- Investigating and apprehending numerous contractor fraud criminals in the wake of one of the worst natural disasters in United States history, Hurricane Katrina.
- Doubling the number of arrests for crime against children through the Louisiana Internet Crimes Against Children Task Force.

Prior to serving as Louisiana Attorney General, over the course of a distinguished career spanning decades, General Foti took countless cases to trial. General Foti served as the head of the criminal division of the city of New Orleans Attorney's Office. He served as the police attorney for the city of New Orleans and prosecuted federal cases including prisoner overcrowding cases. He also served as an assistant District Attorney for Orleans Parish. Even early in his career, he tried cases as in house counsel for the nationally-known insurance carrier, Allstate.

In his tenure as Orleans Parish Criminal Sheriff, General Foti oversaw the enormous expansion of the parish jail, growing from 800 prisoners in 1973 to more than 7,000 currently. As the prison expanded, so did the need for education and rehabilitation skills for prisoners. As Sheriff, General Foti started the first reading and GED programs, work release programs, drug treatment programs and the nation's first boot camp at the local level, all to prepare prisoners for a future without crime. Administratively, General Foti managed a multi-million dollar budget and a complex organization of more than 1,400 employees.

General Foti has for many years been an advocate for the elderly. As Sheriff, he and a small army of volunteers provided Thanksgiving meals for senior citizens in the New Orleans area. He started a back-to-work program for senior citizens that helps people over the age of 55 get back into the workforce.

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General Foti received his Juris Doctor degree from Loyola University Law School in 1965, after serving his country in the United States Army from 1955 through 1958.

**Kim E. Miller**

Kim E. Miller is a KSF partner who specializes in securities and other complex class action litigation. Ms. Miller supervises KSF's New York City office. Prior to joining KSF in 2006, Ms. Miller was a partner at one of the nation's leading plaintiff class action firms. Ms. Miller also spent time early in her career as a securities litigator in the defense bar.

*"One of the best lawyers to appear in front of me in a long time..."*

*Hon. Charles R. Breyer,  
United States District Judge  
In Re:ShoreTel, Inc. Sec. Litig.*

Recently, Ms. Miller was the lead plaintiff's lawyer for *Pearlstein v. BlackBerry Limited*, et al., No. 13-cv-7060 (S.D.N.Y.), and *In re Chicago Bridge & Iron N.V. Securities Litigation*, No. 1:17-cv-1580 (S.D.N.Y.), which resulted in settlement agreements on the eve of trial for \$165 million and \$44 million, respectively. She was also the lead plaintiff's lawyer in *Farrar v. Workhorse Group, Inc.*, et al., No. 2:21-cv-02072-CJC-PVC (C.D. Cal.). On July 28, 2023, after more than two years of hard-fought litigation, the Hon. Cormac J. Carney entered a Final Judgment approving a **\$35 million** settlement of the Class' claims. She was also the firm's lead attorney in the *Halliburton* litigation (**\$100M settlement**).

In a relatively recent Order and Final Judgment in an action where the Firm served as Lead Counsel, the Federal District Court noted:

"Indeed, I find that this action has been a model of how complex class actions should be conducted. Counsel for the Lead Plaintiff, Kim Miller, and her firm, Kahn Swick & Foti, L.L.C., and [Defense Counsel] showed the utmost professionalism and civility, required very limited court intervention while diligently pursuing their objectives, and sought and obtained a fair and reasonable settlement before incurring substantial costs for discovery and trial preparation, all to the benefit of the Lead Plaintiff, Class Members, and the Defendants....I applaud their skill, expertise, zealotness, judgment, civility, and professionalism in putting the best interests of their respective clients first and not only foremost, but exclusively ahead of their law firms' financial interests. Ms. Miller and [Defense Counsel] and their respective law firms earned my unyielding admiration and respect in this case for the efficient and exceptionally reasonable way in which they found a prompt, fair, and equitable solution to the complex problems their clients faced in this litigation, and they accomplished all of this with virtually no judicial

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intervention. In sum, my only deeply held regret in this case is that bioscience has not sufficiently advanced to allow the cloning of Ms. Miller and [Defense Counsel] for lead counsel roles in all complex civil class action litigation in the Northern District of Iowa.”

*Elgaouni v. Meta Financial Group, Inc.*, 10-4108-MWB (N.D. Iowa)  
(June 29, 2012) (Bennett, J.)

At another settlement hearing where Ms. Miller served as Lead Counsel for KSF, *In re ShoreTel, Inc. Sec. Litig.*, 3:08-cv-00271-CRB (N.D. Cal.), the District Court (Breyer, J.) noted: “You're one of the best lawyers to appear in front of me in a long time....”

Ms. Miller’s class action trial experience includes participating as a trial team member in a four-month jury trial involving fraud-based claims that resulted in a jury verdict in favor of the class.

Earlier in her career, Ms. Miller was involved in a variety of other cases in which large settlements were obtained, including:

- **Settlement value of \$127.5 million.** *Spahn v. Edward D. Jones & Co., L.P.*, 04-cv-00086-HEA (E.D. Mo.)
- **\$110 Million Recovery.** *In re StarLink Corn Prods. Liab. Litig.*, MDL No. 1403 (N.D. Ill.)
- **\$100 Million Recovery.** *In re American Express Financial Advisors, Inc. Sec. Litig.*, 1:04-cv-01773-DAB (S.D.N.Y.)

After graduating with honors from Stanford University in 1992 with a double major in English and Psychology, Ms. Miller earned her Juris Doctor degree from Cornell Law School, cum laude, in 1995. While at Cornell, Ms. Miller was the Co-Chair of the Women’s Law Symposium, Bench Brief Editor of the Moot Court Board, and a member of the Board of Editors of the *Cornell Journal of Law & Public Policy*. She was also a judicial intern for The Honorable David V. Kenyon in the Central District of California. Her pro bono work includes representing families of 9/11 victims at *In re September 11 Victim Compensation Fund* hearings. Ms. Miller also has served as a fundraiser for the New York Legal Aid Society.

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**Melinda A. Nicholson**

Melinda A. Nicholson, a partner in KSF's Louisiana office, focuses on shareholder derivative and class action litigation, representing institutional and individual shareholders in corporate governance litigation and securities fraud actions, antitrust, and ERISA matters. Ms. Nicholson also oversees KSF's shareholder derivative practice.



Ms. Nicholson has been involved in a number of significant derivative and class action cases throughout the country seeking recovery for harmed shareholders and individuals, obtaining seminal decisions in shareholders' favor, including:

- *Oliver, et al. v. American Express Company, et al.*, No. 1:19-cv-00566 (E.D.N.Y.). On April 30, 2020, the Hon. Nicholas G. Garaufis, United States District Court Judge for the Eastern District of New York, entered an Order denying, in part, defendants' motion to dismiss. This matter, in which Kahn Swick & Foti, LLC is a member of Plaintiffs' Executive Committee, seeks damages, restitution, and injunctive relief against the American Express Company and American Express Travel Related Services Company, Inc. (collectively, "Amex"), on behalf of persons that used an electronic form of payment other than an Amex charge or credit card to purchase goods and services sold by merchants across the country at prices allegedly inflated by Amex's non-discrimination provisions. Judge Garaufis ruled that plaintiffs adequately pled violations of 22 state antitrust and/or consumer protection laws and allowed plaintiffs' case to proceed against Amex for these violations.
- *In re Fitbit, Inc. Stockholder Derivative Litigation*, Consolidated C.A. No. 2017-0402 (Del. Ch.). On December 14, 2018, Vice Chancellor Joseph R. Slight III of the Delaware Chancery Court rejected a motion to dismiss a stockholder derivative suit alleging insider trading and breach of fiduciary duty claims against executive officers and directors of Fitbit, Inc. ("Fitbit"). The lawsuit, in which Ms. Nicholson serves as co-lead counsel, alleges that certain insiders made \$385 million in stock sales in the company's initial public offering and—after agreeing to release the insiders from lock-up agreements that barred them from trading for 180 days after the initial public offering—an early secondary offering, taking take advantage of an artificially positive market response to Fitbit's flagship PurePulse heartrate monitoring technology. Vice Chancellor Slight held that the plaintiffs' complaint—bolstered by internal company documents obtained by KSF and its co-counsel—reasonably alleges that, while Fitbit was actively promoting its PurePulse technology, the company internally was struggling to correct and contain news about serious problems with the accurate functioning of their devices containing PurePulse. In the opinion, Vice Chancellor Slight further

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held that the complaint adequately pled that the directors and officers who sold stock traded on inside information, and “designed the secondary offering to accommodate sellers’ interests.”

- *Dougherty v. Esperion Therapeutics, Inc., et al.*, No. 16-10089 (E.D. Mich.). On September 27, 2018, the Sixth Circuit Court of Appeals reversed and remanded the lower court’s dismissal of the securities class action filed on behalf of a putative class of Esperion Therapeutics, Inc. investors. In a decision written by Senior Circuit Judge Eugene Edward Siler, Jr., the Sixth Circuit held that the district court erred by concluding that lead plaintiffs had not adequately alleged scienter, stating that, “Esperion has offered no innocent inference stronger than Plaintiffs’ inference that Esperion knowingly or recklessly made material misrepresentations or omissions in its [] communications with investors.” The Court further held that defendants’ “innocent inference” explanations were either implausible or actually supported lead plaintiffs’ allegation of recklessness.

Since joining KSF, Ms. Nicholson has also been involved in a number of cases which ultimately resulted in successful settlements, including:

- *Orrego v. Lefkofsky (Groupon, Inc. Derivative Litigation)*, No. 12 CH 12420 (Ill. Cir. Ct, Cook Cnty., Ch. Div.) (settlement consisting of broad corporate governance reforms with an estimated value of **\$159 million**);
- *In re Bank of America Corporation Securities, Derivative, & Employee Retirement Income Security Act (ERISA) Litigation*, No. 09-MD-2058 (S.D.N.Y.) (Court-approved settlement including **\$62.5 million cash recovery** and substantial corporate governance changes);
- *Bassett Family Trust v. Costolo, et al. (Twitter, Inc. Derivative Litigation)*, C.A. No. 2019-0806 (Del. Ch.) (settlement resulted **\$38 million** payment and targeted corporate governance reforms);
- *In re Fifth Street Finance Corp. Stockholder Litigation*, Consolidated C.A. No. 12157 (Del. Ch.) (settlement resulted in governance enhancements and advisory fee reductions worth an estimated **\$30 million**);
- *In re Barnes & Noble Stockholder Derivative Litigation*, C.A. No. 4813 (Del. Ch.) (settlement resulted in **\$29 million recovery** for the company);
- *In re Fitbit, Inc. Stockholder Derivative Litigation* Consolidated C.A. No. 2017-0402 (Del. Ch.) (settlement resulted in **\$5 million recovery** for the company);
- *In re FAB Universal Corporation Shareholder Derivative Litigation*, Lead Case No. 14-cv-687 (S.D.N.Y.) (settlement involving broad corporate governance reforms);

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- *Lowry v. Basile (Violin Memory, Inc. Derivative Litigation)*, No. 4:13-cv-05768 (N.D. Cal.) (broad corporate governance reform settlement); and
- *In re Moody's Corporation Shareholder Derivative Litigation*, 1:08-CV-9323 (S.D.N.Y.) (settlement involving comprehensive corporate governance reforms).

Prior to joining the firm in 2010, Ms. Nicholson worked for defense firms in New York, handling complex commercial litigations and regulatory investigations involving a variety of legal issues, including fiduciary obligations, securities violations, contractual breaches, antitrust and insurance coverage. Ms. Nicholson received a B.A. in Political Science, with a concentration in American Politics and Policies and a minor in Economics, from Tulane in 2003 and a J.D. from Tulane in 2005. While at Tulane Law School, Ms. Nicholson served as a Notes and Comments Managing Editor for the Tulane Law Review, which published her comment, *The Constitutional Right to Self-Representation: Proceeding Pro Se and the Requisite Scope of Inquiry When Waiving Right to Counsel*, 79 TUL. L. REV. 755 (2005). She has received numerous awards, including the Dean's Medal for attaining the highest grade point average during the third year, the George Dewey Nelson Memorial Award for attaining the highest grade point average in common law subjects throughout the three years of law study, and Order of the Coif. She graduated from the law school *summa cum laude* and ranked second in her class.

Ms. Nicholson is regularly asked to give presentations and conduct CLEs addressing her practice areas.

Ms. Nicholson is admitted to practice in Louisiana, New York, and Texas, the United States Courts of Appeal for the Fifth Circuit, and before the United States District Courts for the Southern District of Texas, Northern District of Texas, Eastern District of Louisiana, Western District of Louisiana, Southern District of New York, Eastern District of New York, District of Colorado, and Eastern District of Michigan.

**Michael J. Palestina**

Mr. Palestina practices securities and other complex class action litigation. He focuses his practice on securities litigation involving mergers and acquisitions. In his capacity as a KSF partner, Mr. Palestina currently serves as lead, co-lead, or executive committee counsel in several ongoing M&A cases and has previously served in the same capacity in several successfully resolved M&A cases.

For example, Mr. Palestina took part in the successful resolution of *In re EnergySolutions, Inc. Shareholder Litigation*, Consol. C.A. 8203-YCG (Del. Ch. 2013), a securities class





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action involving claims for breach of fiduciary duties to shareholders relating to a proposed merger of nuclear energy related companies worth \$1.1 billion (\$375 million in proposed shareholder consideration), where there was a \$0.40 price increase, which increased the consideration to shareholders by more than 10%, or approximately \$38 million, and over 20 pages of additional disclosures to the proxy statement relating to process and pricing claims. Mr. Palestina also served as one of three co-lead counsel in *In re American Capital, Ltd. Shareholder Litigation*, Case No. 422598-V (Circuit Court for Montgomery County, Maryland 2016), a securities class action involving claims for breach of fiduciary duty in connection with the sale of American Capital Ltd. against both American Capital's board and senior officers and Elliott Management Corporation, the activist investor fund that agitated for the sale. Therein, Mr. Palestina was instrumental in obtaining a **\$17.5 million settlement** from American Capital's board members and officers and Elliott, in so doing defeating a motion to dismiss by Elliott and obtaining an unprecedented ruling that Elliott may be considered a controller and subject to entire fairness review at trial. More recently, in March 2020, after litigating the matter **to the eve of trial**, Mr. Palestina obtained a \$6.5 million settlement recovery for former U.S. Geothermal Inc. shareholders in connection with its merger with Ormat Technologies, Inc; this recovery represented a 7.7% premium to the adjusted enterprise value of the buyout.

Several of Mr. Palestina's current cases also implicate evolving and novel areas of corporate merger law. For example, in *Helen Moore v. Macquarie Infrastructure and Real Assets, et al. (Cleco Corporation Merger)*, Case No. 251,417, c/q 251,456 and 251,515, Div. "C" (9th JDC, Louisiana, 2014), in which Mr. Palestina serves as one of two Interim Co-Lead Counsel, he was instrumental in securing a landmark Louisiana appellate decision finding that merger-related challenges are direct, and not derivative, in nature. Mr. Palestina is also currently litigating several similar cases that touch on the same direct-vs-derivative issue under Maryland law.

Prior to joining KSF, Mr. Palestina clerked for the honorable Catherine D. Kimball, former Chief Justice of the Louisiana Supreme Court, and practiced law at a well-respected New Orleans litigation firm. While there, Mr. Palestina gained valuable trial experience, focused on complex commercial litigation, and represented a number of judges and his fellow lawyers regarding ethical issues before the State's judicial and attorney disciplinary systems.

Mr. Palestina graduated from Tulane University in 2005 with a Bachelor of Arts in Political Science. He earned his J.D. in 2008 from Loyola University of New Orleans College of Law, where he graduated *magna cum laude*, was a William L. Crowe, Sr. Scholar, and was inducted into the Order of Barristers. While in law school, Mr. Palestina was a member of the Loyola Law Review and Loyola Moot Court, was the first place oralist in the Loyola Intramural Moot Court Competition, and represented



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Loyola at the Stetson International Environmental Moot Court Competition (where he was the fourth place oralist overall) and on the National Team at the New York Bar Association's National Moot Court Competition (where his team advanced to the finals). Mr. Palestina also served as a research assistant to the Leon Sarpy Professor of Law Professor Kathryn Venturatos Lorio, whom he assisted in a revision of her Westlaw treatise on Louisiana Succession and Donations, and as a Judicial Intern to Magistrate Joseph C. Wilkinson, Jr. of the United States Federal District Court for the Eastern District of Louisiana. Mr. Palestina's Law Review article, *Of Registry: Louisiana's Revised Public Records Doctrine*, was published in the Loyola Law Review.

Mr. Palestina is licensed to practice in Louisiana state and federal courts.

## J. Ryan Lopatka

J. Ryan Lopatka, a partner in KSF's Chicago office, focuses primarily on federal securities class action litigation.

Mr. Lopatka was a member of the team that litigated against Halliburton Company in one of the most closely followed securities cases of all time. The litigation, which spanned more than a decade, included two landmark decisions from the Supreme Court. The first, *Erica P. John Fund, Inc. v. Halliburton*, 1331 S.Ct. 2179 (2011), a 9-0 unanimous opinion, reversed the rulings of the district court and Fifth Circuit Court of Appeals denying the investors' motion for class certification on loss causation grounds. The second, *Halliburton Co. v. Erica P. John Fund, Inc.*, 134 S.Ct. 2389 (2014), preserved the fraud-on-the-market doctrine, and helped pave the way towards a **\$100 million recovery** for the class.



More recent successes include *Pearlstein v. BlackBerry Limited, et al.*, No. 13-cv-7060 (S.D.N.Y.) and *In re Chicago Bridge & Iron N.V. Securities Litigation*, No. 1:17-cv-1580 (S.D.N.Y.), which resulted in settlement agreements on the eve of trial for **\$165 million** and **\$44 million**, respectively.

Mr. Lopatka successfully argued before the United States Court of Appeals for the Second Circuit to vacate an order from the Southern District of New York granting motion to dismiss in a securities class action against NewLink Genetics Corp. The 26-page ruling from the three-judge panel in *Abramson v. NewLink Genetics Corp.*, 2020 U.S. App. LEXIS 21545 (2d Cir. July 13, 2020) revitalized investors' claims against the bio-pharmaceutical company, and further developed the law of the Second Circuit with regard to loss causation and the actionability of opinion statements under the Supreme Court's 2015 decision in *Omnicare, Inc. v. Laborers Dist. Council Const. Industry Pension Fund*, 575 U.S. 175 (2015). After

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remand, KSF secured a **\$13.5 million** settlement for the class, an achievement the late Hon. William H. Pauley commended: “you turned a case that was a loser in the district court into a victory for plaintiffs...”

Before a three-judge panel of the Tenth Circuit in *Hogan v. Pilgrim’s Pride Corp.*, 73 F. 4th 1150 (10th Cir. 2023), Mr. Lopatka successfully appealed the dismissal of a putative securities class action on repose grounds. The case, currently pending in the District of Colorado, involves allegations that Defendants misled investors regarding Pilgrim Pride’s operations and finances amid a years-long collusive scheme to fix chicken prices, and is the only one of three securities class actions involving similar claims against poultry producers to still survive.

Mr. Lopatka also dedicates his time to promote best practices in complex litigation. For example, Mr. Lopatka served alongside attorneys representing both plaintiffs and defendants as a project member with the Electronic Discovery Reference Model (EDRM) to identify common problems and solutions (including potential amendments to the Federal Rules of Civil Procedure) related to the process of recording documents withheld from production on a claim that they contain attorney-client communication or work product.

Mr. Lopatka received his J.D. from Tulane University Law School in 2010. During the summer of 2009, he studied international capital markets and securities law at Cambridge University and Queen Mary School of Law in London, England. He received his B.A. with honors in history from Loyola University New Orleans in 2004.

Mr. Lopatka is admitted to practice in Louisiana and Illinois.

### Craig J. Geraci

Craig J. Geraci, Jr. is a partner in KSF’s Louisiana office and focuses on federal securities litigation and other complex class action litigation. He is actively involved in cases pending before federal courts across the United States.

Mr. Geraci has litigated numerous securities matters and helped recover more than **\$325 million** for shareholders allegedly defrauded by publicly traded companies and their officers. For example, Mr. Geraci was a member of the litigation team in *Halliburton Co. v. Erica P. John Fund, Inc.*, 134 S.Ct. 2389 (2014), a landmark securities-fraud class action, where the U.S. Supreme Court ruled for KSF’s client on the most important issue in the case, and in *Erica P. John Fund, Inc. v. Halliburton*, 131 S.Ct. 2179 (2011), where



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the Court ruled unanimously for KSF's client. The *Halliburton* case ultimately resulted in a **settlement of \$100 million**. More recently, Mr. Geraci was a member of the litigation teams in *In re Chicago Bridge & Iron Company N.V. Securities Litigation*, No. 1:17-cv-1580 (S.D.N.Y.) and *Pearlstein v. BlackBerry Limited, et al.*, No. 1:13-cv-7060 (S.D.N.Y.), both of which settled on the eve of a jury trial for **\$44 million** and **\$165 million**, respectively.

Mr. Geraci received his J.D. from Tulane University Law School in 2009 and received a B.S. with a major in finance from the University of New Orleans in 2005.

Prior to joining KSF, Mr. Geraci focused his practice on complex commercial and corporate litigation, primarily for clients in the energy industry. In that role, he litigated numerous matters in state and federal courts across the country, including a case where he helped obtain a unanimous verdict in a three-week jury trial, awarding more than \$4 million in contract damages and \$2.7 million in fraud and punitive damages. He also presented oral argument, as a second-year associate, before the U.S. Court of Appeals for the Federal Circuit.

Mr. Geraci is admitted to practice in Louisiana, Mississippi, Alabama, and Texas, and he is a member of those states' bar associations. Further, Mr. Geraci is admitted to practice before the United States Court of Appeals for the Second Circuit, Fifth Circuit, and Federal Circuit and the United States District Courts for the Eastern, Middle, and Western Districts of Louisiana, the Northern, Eastern, and Southern Districts of Texas, and the Northern and Southern Districts of Mississippi.

### Chris Quinn

Chris Quinn is a partner in the Delaware office of Kahn Swick & Foti, LLC. Mr. Quinn focuses his practice on the prosecution of stockholder class and derivative actions for breach of fiduciary duty in the Delaware Court of Chancery and Delaware Supreme Court.

Mr. Quinn has significant experience in all stages of litigation in the Court of Chancery, from case generation through trial, particularly in stockholder class and derivative actions arising from mergers and acquisitions and other significant transactions. After starting his career at a large Delaware firm best known for its defense work, Chris worked prior to KSF at two plaintiff-side, boutique Delaware firms, where he was a key member of trial and litigation teams that recovered collectively more than **\$1.0 billion** for stockholders and derivative plaintiffs.



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While in law school, Chris was a summer associate at a prominent Delaware firm and served as a judicial intern for the Honorable J. Curtis Joyner of the United States District Court for the Eastern District of Pennsylvania.

Mr. Quinn earned his J.D. in 2012 from Villanova University School of Law, where he graduated *cum laude* and was an Associate Editor of *Villanova Law Review*, and earned bachelor's degrees in Finance and Economics from the University of Delaware in 2009.

**Bruno Rosenbaum**

Bruno Rosenbaum is a partner at KSF in New York and manages the Firm's European business development operations. He assists institutional investors on navigating complex cross-border disputes, shareholder litigation, and corporate governance matters, ensuring clients maximize their legal remedies in both domestic and global markets.

With deep expertise in securities litigation, arbitration, and passive claims filing, Mr. Rosenbaum works closely with asset managers, pension funds, and sovereign wealth funds. He assists clients in evaluating opportunities to recover investment losses through a range of legal avenues, including U.S. class actions, opt-out cases, and non-U.S. collective actions across North America, Europe, Asia, Australia, and Brazil.

Mr. Rosenbaum has played an integral role in a number of high-profile cases, guiding clients through litigation strategies tailored to their specific jurisdictions and regulatory environments. Before joining KSF, he practiced at leading international law firms in New York, Paris, Luxembourg, and Miami, focusing on securities litigation, international arbitration, and corporate transactions. His multilingual proficiency—he speaks seven languages—allows him to effectively bridge legal and cultural differences when advising a global client base.

Mr. Rosenbaum is a frequent speaker at investor conferences throughout Europe, where he provides insights on shareholder litigation, corporate governance, and investment loss recovery. He regularly engages with institutional investors, asset managers, and pension funds to discuss emerging trends, cross-border litigation strategies, and the evolving regulatory landscape affecting investor rights.

A graduate of Columbia Law School, where he served as an editor for the *Columbia Journal of European Law*, Mr. Rosenbaum also holds an MBA and a Master II from Panthéon-Assas Paris II and a Master I from Panthéon-Sorbonne Paris I.

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**Matthew P. Woodard**

Matthew P. Woodard is a partner at KSF's New Orleans office, where his practice focuses on prosecuting complex securities fraud class actions.

Matthew played a key role in securing KSF's appointment as Lead and Co-Lead Counsel in actions against Credit Suisse Group AG, Workhorse Group, Inc., CarLotz, Inc., Pareteum Corporation, Honeywell International, Inc., IntelliPharmaceuticals International, Inc., Pilgrim's Pride Corporation, and Chicago Bridge & Iron Company N.V.



He is as a member of a litigation team that has helped recover more than \$386 million for shareholders. *Pearlstein et al. v. BlackBerry et al.* (\$165 million settlement); *Erica P. John Fund, Inc. v. Halliburton* (\$100 million settlement); *In re Chicago Bridge & Iron Co. N.V. Sec. Litig.* (\$44 million settlement); *Farrar et al. v. Workhorse Group, Inc. et al.* (\$35 million settlement) *Abramson et al. v. NewLink Genetics Corp. et al.* (\$13.5 million settlement); *In re Tesco PLC Sec. Litig.* (\$12 million settlement); *Kanefsky et al. v. Honeywell Int'l Inc. et al.* (\$10 million settlement); *In re Pareteum Sec. Litig.* (\$5.65 million settlement); *Shanawaz et al. v. IntelliPharmaceuticals Int'l Inc. et al.* (\$1.6 million settlement).

Matthew received his Bachelor of Arts degree in English, cum laude with honors, from The University of the South: Sewanee and his Juris Doctor degree from Tulane University School of Law. During law school, Matthew served as the Senior Managing Editor for the Tulane Journal of Law & Sexuality: Volume 21.

Mr. Woodard is admitted to practice in Louisiana and is a member of the Louisiana State Bar Association.

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## SPECIAL COUNSEL

**Vincent Giblin****Special Counsel to KSF - DeCotiis Fitzpatrick Cole & Giblin, LLP - Paramus, NJ**

Vincent Giblin, as Special Counsel to KSF, is an experienced trial attorney and partner with DeCotiis Fitzpatrick Cole & Giblin LLP. Prior to his career in the private sector, Mr. Giblin served as an Assistant U.S. Attorney in the District of New Jersey. For his efforts at the U.S. Attorney's Office, Mr. Giblin received special recognition from the U.S. Secret Service, U.S. Postal Inspection Service and the Federal Bureau of Investigation. He was also bestowed with the 2002 Administrator's Award, one of the highest honors by the U.S. Drug Enforcement Administration, for his outstanding



achievement in law enforcement. Trials that Mr. Giblin participated in include: *United States v. Robert Kosch and Ravidath Ragbir*, a wire fraud conspiracy involving fraudulent mortgage proceeds; *United States v. Luis Cruz*, a gang-related crack cocaine conspiracy; and *Walsh v. Walsh*, a minority shareholder action.

Mr. Giblin regularly appears as trial counsel in state and federal courts. Mr. Giblin handles complex federal litigation, white collar criminal defense, and compliance matters for private corporate and not-for-profit organizations. Mr. Giblin has substantial experience with class action litigation including securities litigation, trade secret litigation, First Amendment issues, international business torts, and minority shareholder actions and bankruptcy-related litigation. Mr. Giblin currently serves as the outside general counsel for the International Union of Operating Engineers representing over 450,000 members nationally.

Mr. Giblin received a B.A. from Rutgers College in 1992 where he was a member of the Rutgers Intercollegiate Lacrosse Team. Following receiving his J.D. from Seton Hall University School of Law in 1995, he served as a law clerk for the Hon. Clarkson S. Fisher, U.S.D.J. for the U.S. District Court of the District of New Jersey. Mr. Giblin is admitted to practice in New Jersey, and is admitted to practice before the United States Court of Appeals for the Third Circuit, and the United States District Courts for the District of New Jersey, Southern District of New York, and District of Columbia.

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## OF COUNSEL

**Melissa Harris**

Melissa Harris, Of Counsel in KSF's New Orleans office, practices securities and other complex commercial and class action litigation. Ms. Harris has successfully litigated numerous securities matters in which shareholders stand to recover more than **\$100 million** for shareholders allegedly defrauded by publicly traded companies and their officers. For example, Ms. Harris was a member of the litigation team in *Pearlstein v. Blackberry*, No. 13-7060 (S.D.N.Y.) (**\$165 million settlement**), and *In re Chicago Bridge & Iron Company N.V. Securities Litigation*, No. 17-1580 (SD.N.Y.) (**\$44 million settlement**) has been granted. Ms. Harris is also litigating several pending securities fraud cases that have survived motions to dismiss and are now settlement stage, including *Farrar v. Workhorse*, No. 21-cv-2072, pending in the Central District of California, and *In re Pareteum Securities Litigation*, No. 19-9767, pending in the Southern District of New York. Ms. Harris also has substantial experience in shareholder derivative suits and securities litigation involving mergers and acquisitions.



Prior to joining KSF, Ms. Harris worked at a well-respected regional law firm in New Orleans, where she handled defense of complex commercial litigation, government contracts disputes, and government investigations in state and federal courts around the country, as well as before federal agencies, including the Consumer Financial Protection Bureau, Federal Trade Commission, and United States Department of Justice. Ms. Harris also represented financial institutions and other companies in lawsuits under the federal False Claims Act and related state and local false claims laws. Ms. Harris has extensive experience with ESI and e-discovery and has presented and published on this topic numerous times.

Before moving to New Orleans, Ms. Harris clerked in federal court for four years in Hattiesburg, Mississippi for the Honorable M. Keith Starrett and the Honorable Michael T. Parker. A native New Yorker, Ms. Harris began her career at a large, prestigious defense firm in New York City where she handled complex commercial litigation, including antitrust, securities, and white-collar criminal matters, and regulatory investigations.

Ms. Harris graduated from Fordham Law School *magna cum laude*, in the top 2% of her class. Ms. Harris was a member of the *Fordham Law Review*, was Order of the Coif, and received the Archibald R. Murray Public Service Award and the West Award for Outstanding Academic Achievement. Ms. Harris received



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her undergraduate degree from Vassar College *cum laude*, with a major in Classics and a minor in Religion.

Ms. Harris is admitted to practice in Louisiana and New York state courts, as well as in the United States District Courts for the Eastern, Middle, and Western Districts of Louisiana and the Southern and Eastern Districts of New York, and the United States Court of Federal Claims. She is a member of the Federal Bar Association, American Bar Association, Louisiana State Bar Association, and New Orleans Bar Association.

**Nicolas Kravitz**

Nicolas Kravitz, Of Counsel in KSF's New Orleans office, prosecutes shareholder derivative and ERISA lawsuits to redress breaches of fiduciary duty and other wrongdoing by public companies' boards of directors and executive officers. To date, Mr. Kravitz has been involved in litigation that has benefited shareholders by successfully recovering more than **\$50 million** and implementing robust corporate governance reforms worth millions more, including:



- **\$46.75 million** recovery plus substantial corporate governance reforms obtained in settlement on behalf of Twitter, Inc. shareholders in the action *Bassett Family Trust v. Costolo, et al.*, No. 2019-0806-PAF (Del. Ch.);
- **\$5 million** recovery obtained in settlement on behalf of Fitbit, Inc. shareholders in the action *In re Fitbit, Inc. Stockholder Derivative Litigation*, No. 2017-0402-JRS (Del. Ch.);
- Substantial corporate governance reforms obtained in settlement on behalf of Surgalign Holdings, Inc. shareholders in the action *In re RTI Surgical Derivative Litigation*, No. 1:20-cv-3347 (MFK) (N.D. Ill.); and
- Substantial corporate governance reforms obtained on behalf of GoPro, Inc. shareholders in the action *In re GoPro Stockholder Derivative Litigation*, No. 4:18-cv-00920-CW (N.D. Cal.).

Mr. Kravitz received his J.D., *cum laude*, from Georgetown University Law Center in 2014. Prior to joining KSF, he practiced corporate litigation in Wilmington, Delaware focusing on complex matters in the Delaware Court of Chancery, where he served as trial counsel in numerous matters and gained specialized experience in fiduciary duty litigation.



**Kahn Swick & Foti, LLC**

Mr. Kravitz is admitted to practice in Louisiana, Delaware, and the United States District Court for the District of Delaware.

**Dennis White**

Dennis White, Of Counsel in KSF's Chicago office, works with the firm's Institutional Investors. In addition to over twenty plus years of legal experience in regulatory compliance, public policy, procurement, and legislative approval, Dennis brings significant public pension administration experience.



Prior to joining KSF, Dennis most recently served as the Executive Director of the Municipal Employees' Annuity and Benefit Fund of Chicago, a \$3.5 Billion pension fund. He also has served as a Trustee and the Interim Executive Director of the Cook County Pension Fund (the "CCPF"), a \$14.3 Billion pension fund that provides pension, disability and other benefits to employees of both Cook County and the Forest Preserve District of Cook County. He initially was elected to serve on the Board of Trustees as the Forest Preserve District's representative on the CCPF Board, while serving as the Chief Attorney of the Forest Preserve District of Cook County.

Prior to leading the Forest Preserve District's legal department as the Chief Attorney, Dennis began his legal career as a staff attorney in the legal division of the Board of Governors of the Federal Reserve System in Washington, D.C. Subsequently, he joined the Washington, D.C. office of Rudnick and Wolfe law firm (now known as DLA Piper); worked as a staff attorney and business executive for General Motors Corporation in Detroit, Michigan; and joined the Chicago office of Holland & Knight, LLP law firm as Senior Counsel.

Dennis earned his B.S. in Mechanical Engineering from the University of Illinois at Urbana-Champaign, his J.D. from Northwestern University Law School, and his M.B.A. from the University of Chicago Booth School of Business.

**Kahn Swick & Foti, LLC****Daniel Kuznicki**

Daniel Kuznicki, Of Counsel in KSF's New York office, focuses on securities litigation, representing shareholders in class actions concerning allegations of securities fraud and breaches of fiduciary duties in connection with corporate governance and mergers and acquisitions.

Before turning his attention to class action litigation, Mr. Kuznicki's practice focused on litigation and corporate matters involving trademarks, licensing, contracts, securities and real estate.



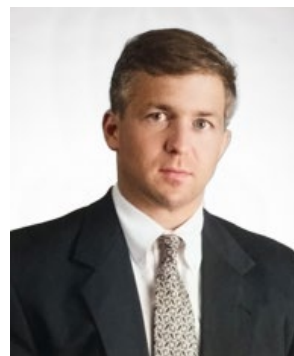
Mr. Kuznicki earned his juris doctorate from New York University School of Law in 2008 and graduated summa cum laude in 2005 with a bachelor's degree in Talmudic Law from Yeshiva Bnei Torah Institute.

Mr. Kuznicki is admitted to practice law in the State of New York, and the United States District Court for the Southern District of New York, as well as the United States Court of Appeals for the Second Circuit.

**C. Mark Whitehead III**

Mark Whitehead, Of Counsel in KSF's New Orleans office, practices complex class action litigation.

Mr. Whitehead has been practicing in the field of mass torts and class actions since 2001. He has been involved in numerous environmental cases involving class claims for property damage and medical monitoring. Mark also represented the Boilermakers' Union Local 1814 in New Orleans, LA. He served on the plaintiff's committee for consolidated Vioxx mass tort litigation in New Jersey and has served on the science committee of the Plaintiff's Steering Committee in the PPA multi-district litigation, as well as serving similar roles in the Bextra/Celebrex, Vioxx, PPA, Fen-Phen, and Avandia MDLs. Mark is currently serving as a member of the science, bellwether trial, and expert witness committees in the Xarelto MDL. Mark has authored and co-authored publications in fields as diverse as aviation, neurosurgery, vascular surgery, and cardiology and was the recipient of the American Venous Forum Research Award. He has also served as acting coroner for Vermilion Parish and was on the Eunice, Louisiana Regional Airport Commission.



Mr. Whitehead received his J.D. from Tulane University Law School in 2000 after receiving his M.D. from Tulane University School of Medicine in 1995 and a B.S. from the University of Georgia in 1991.

**Kahn Swick & Foti, LLC**

Mr. Whitehead is admitted to practice in Louisiana and Florida state courts, as well as in the United States District Courts for the Eastern District of Louisiana, Middle District of Louisiana, Western District of Louisiana, United States District Courts for the Northern and Southern Districts of Florida, and the Fifth Circuit Court of Appeals. He is a member of the American Association for Justice, Louisiana Association for Justice, Florida Justice Association, Louisiana Bar Association, Florida Bar Association, District of Columbia Bar Association, Louisiana State Medical Society, and the Vermilion Parish Medical Society (past treasurer and vice president).

**Andrew J. Gibson**

Andrew Gibson, Of Counsel in KSF's New Orleans office, focuses his practice on merger and acquisition litigation, shareholder derivative actions, and other complex class action litigation.

Mr. Gibson is also responsible for the formation and management of the firm's Business Loss Claim division, wherein he represents hundreds of businesses and non-profit organizations in claims under the Deepwater Horizon Economic and Property Damage Settlement. He also has broad experience representing clients in commercial and casualty litigation in Louisiana state and federal courts and has obtained a consistently successful record for his clients.



Mr. Gibson received his J.D. from Loyola University New Orleans College of Law in 2004. While in school, he served as a Teaching Assistant and Staff member for the Moot Court program, was twice elected to the Executive Board of the Student Bar Association, and clerked at a nationally recognized law firm. During the summer of 2003, he studied Latin American civil law systems and international arbitration at the University of Costa Rica School of Law in San Jose, Costa Rica. He earned a Bachelor of Science degree in Business with a concentration in Pre-Law from the E.J. Ourso College of Business at Louisiana State University in 1997 and went on to work as a manager in the marketing department of a regional telecommunications company.

Mr. Gibson is a proud veteran of the United States Marine Corps where he served in the infantry as a Non-Commissioned Officer.

Mr. Gibson is very active in the local business community and has served on the Board of Directors and as Chairman of the Governmental Affairs Committee for the Saint Tammany West Chamber of Commerce, as a member of the St. Tammany Parish Home Rule Charter Committee (2014-15) and as a member of the St. Tammany Parish Inspector General Task Force (2013-2014).

Kahn Swick & Foti, LLC

## ASSOCIATES

### Alexander L. Burns

Alexander L. Burns is an associate in KSF's Louisiana office and focuses on federal securities class actions.

Mr. Burns graduated with honors from the University of Southern Mississippi in 2000 with a B.S.B.A. in accounting. In 2001, he earned his Master of Professional Accountancy and has been a licensed CPA since 2003. From 2001 to 2004 Mr. Burns was employed by Ernst & Young, L.L.P., auditing the financial statements of both privately held and publicly traded entities spanning a variety of industries including casino gaming, health care, insurance, and energy. Following the Enron scandal of the early 2000s, and anticipating the need for attorneys with a strong understanding of accounting issues, Mr. Burns left E&Y to attend law school in 2004.

Mr. Burns received his J.D. and B.C.L. from Louisiana State University's Paul M. Hebert Law Center in 2007. While at LSU, he was awarded the CALI Award for Academic Excellence in Contracts, served as Treasurer of the Trial Advocacy Board, and competed on various interschool mock trial teams. Mr. Burns has since practiced civil litigation, representing his clients' interests in contentious matters in both state and federal courts.

Mr. Burns is a licensed Certified Public Accountant in Louisiana. As an attorney, he is admitted to practice in Louisiana, the related Federal District Courts, the United States District Court for the Eastern District of Michigan, the United States Court of Appeals for the Fifth Circuit, and the United States Court of Appeals for the Ninth Circuit.



### John A. Carriel

John A. Carriel is an associate attorney with KSF. His practice focuses on shareholder derivative and class action litigation, representing institutional and individual shareholders in corporate governance, ERISA, securities fraud, and antitrust litigation. Mr. Carriel has significant experience in all stages of litigation, including pre-suit investigation, case initiation, pre-trial motion practice and hearings, discovery, class certification, settlement approval, trial, and appellate proceedings.



**Kahn Swick & Foti, LLC**

Prior to joining KSF, Mr. Carriel practiced plaintiff's side litigation at two national firms, where he represented clients in complex financial matters, including antitrust, class action, cryptocurrency, derivative, and securities matters. He has represented clients in significant matters seeking recovery for harmed investors, market participants, and individuals, including:

- *In re LIBOR-Based Financial Instruments Antitrust Litig.*, No. 11-md-2262-NRB (S.D.N.Y.) (Represented Freddie Mac and the FDIC as Receiver for Closed Banks, alleging that the LIBOR Panel Banks unlawfully manipulated the U.S. Dollar LIBOR rate.).
- *Rensel v. Centra Tech, Inc.*, 2 F.4th 1359 (11th Cir. 2021) (Successfully argued before the Eleventh Circuit Court of Appeals, securing a significant victory when the Panel vacated the district court's order denying plaintiffs' motion for class certification upon finding that both of the court's alternative grounds for denying the motion were abuses of discretion. The Eleventh Circuit's opinion: (i) established the standard of review for trial courts considering the timeliness of a motion for class certification; (ii) reaffirmed that plaintiffs should typically be permitted discovery prior to moving for class certification; (iii) made clear that a district court's failure to enter a scheduling order violated both the Federal Rules of Civil Procedure and the Local Rules for the Southern District of Florida; and (iv) further rejected the heightened ascertainability requirement for obtaining class certification adopted by other Circuits, including the Third Circuit.).
- *Campbell v. Vilsack*, EEOC No. 570-2018-00277X (Represented, on a *pro bono* basis, a class of deaf and hard of hearing employees of the United States Department of Agriculture (USDA) working in the metropolitan Washington, D.C. area in a disability discrimination action challenging inconsistent, unreliable, and increasingly scrutinized access to sign language interpreting services, co-counseling with the civil rights association the National Association of the Deaf. Following eight years of litigation, the parties reached a [settlement](#) pursuant to which all USDA deaf and hard of hearing employees in the Washington, D.C. region are now able to access sign language interpreting services through a centralized system.).

Mr. Carriel received a J.D. from The George Washington University School of Law in 2017. During law school, he interned for the Enforcement and Investment Management Divisions of the Securities and Exchange Commission and the Legal Division of the Consumer Protection Financial Bureau. He is affiliated with the Hispanic Bar Association of the District of Columbia and has been named a Washington, DC "Rising Star" for 2021-2024 (Antitrust Litigation, Securities Litigation & Class Action & Mass Torts) by *Super Lawyers* magazine.

## Kahn Swick &amp; Foti, LLC

**James Fetter**

Mr. Fetter is an associate attorney at KSF and primarily focuses on securities litigation.

Prior to joining KSF, Mr. Fetter was an associate at a prominent civil rights law firm in Baltimore, Maryland. Mr. Fetter clerked on the U.S. Court of Appeals for the Fourth Circuit for the Honorable Albert Diaz. Mr. Fetter also worked as an associate at a AmLaw100 firm, where he focused on commercial litigation, products liability, and ADA compliance.



Mr. Fetter graduated *magna cum laude* and Order of the Coif from The Ohio State University Moritz College of Law, where he was an executive articles editor for the Ohio State Law Journal. During his time in law school, Mr. Fetter served as an extern at the U.S. District Court for the Southern District of Ohio and the Ohio Supreme Court. Mr. Fetter was also a legal intern at Disability Rights Ohio and a summer associate at an AmLaw100 firm. Mr. Fetter also served as a nonvoting board member for the ACLU of Ohio. Mr. Fetter received his undergraduate degree from Emory University and a Ph.D. in Political Science from the University of Notre Dame.

Mr. Fetter is admitted to practice in Maryland, Ohio, the U.S. Court of Appeals for the Fourth Circuit, the U.S. District Court for the District of Maryland, the U.S. District Court for the Southern District of West Virginia, and the U.S. District Court for the Eastern District of Michigan.

**Jyoti Kehl**

Jyoti Kehl is an associate in KSF's Louisiana office and focuses primarily on federal securities class action litigation.

Since joining the firm in 2018, Jyoti has materially contributed to the prosecution of a number of securities class actions, including *Pearlstein v. BlackBerry Ltd.* (\$165 million settlement achieved on the eve of trial, pending final approval); *In re Chicago Bridge & Iron Company N.V. Sec. Litig.* (\$44 million settlement, pending final approval); and *Kanefsky v. Honeywell International Inc.* (\$10 million settlement). Recently, she collaborated on drafting an amended complaint in *Farrar v. Workhorse Group, Inc.*, which survived in substantial part Defendants' motion to dismiss.



Jyoti received her J.D. cum laude from Tulane University School of Law in 2018, where she was a member of the International Criminal Court appellate moot court team and a Rule XX Student Attorney

**Kahn Swick & Foti, LLC**

with the Tulane Criminal Justice Clinic. She received her B.A. in political science with an emphasis in international political economy from the University of California, Santa Barbara.

Ms. Kehl is admitted to practice in Louisiana.

**Brian C. Mears**

Brian C. Mears is an Associate Attorney in KSF's New Orleans office and focuses on securities litigation involving mergers and acquisitions. Mr. Mears has helped KSF secure material proxy disclosures, and, when necessary, monetary relief when shareholders were deprived of the fair value of their investment as a result of M&A transactions. For example, in March 2020, KSF helped secure a **\$6.5 million** common fund for U.S. Geothermal Inc. shareholders after the company was acquired by Ormat Technologies, Inc.



Mr. Mears received his J.D. and M.B.A. from Tulane University Law School. Prior to joining KSF, Mr. Mears completed a judicial clerkship and worked at a boutique civil litigation firm in New Orleans where his practice focused on employment and maritime personal injury matters in federal and state courts. During his time in law school, Mr. Mears was a member of the Sports Lawyers Journal, and he interned with the general counsel's office at Octagon, Inc., one of the world's largest sports agencies, and with the San Antonio Spurs. Prior to attending law school, Mr. Mears was a member of the women's basketball coaching staff at Tulane University.

Mr. Mears is admitted to practice in all Louisiana state courts and the United States District Court for the Eastern District of Louisiana.

Mr. Mears is a member of the Federal Bar Association, the American Bar Association, the American Association for Justice, the New Orleans Bar Association, and the Academy of New Orleans Trial Lawyers.

**Gina Palermo**



### Kahn Swick & Foti, LLC

Gina Palermo is an Associate Attorney in KSF's New Orleans office and focuses on securities litigation involving mergers and acquisitions.

Prior to joining KSF, Ms. Palermo worked at two boutique civil litigation firms in New Orleans, representing both individuals and businesses in complex commercial litigation, securities actions, construction disputes, and personal injury matters in federal and state courts. She also served as Assistant General Counsel to the Port of New Orleans and New Orleans Public Belt Railroad for three years, where she drafted and negotiated contracts and commercial leases and oversaw litigation for both entities.



Ms. Palermo received her J.D. from Louisiana State University Paul M. Hebert Law School in 2010, where she graduated cum laude. During her time in law school, Ms. Palermo was a Senior Editor of the Louisiana Law Review and interned with Chief Judge Burrell J. Carter at the First Circuit Court of Appeals. Her article, "Waking the Neighbors: Determining a Landowner's Liability for Rowdy Tenants Under Louisiana Law," was published in the Louisiana Law Review. Ms. Palermo received her B.A. in journalism from Louisiana State University in 2007, where she graduated summa cum laude and was awarded the University Medal for academic achievement.

Ms. Palermo is admitted to practice in all Louisiana state and federal courts.

### Alexandra Pratt

Alexandra Pratt is an associate attorney for the firm and focuses primarily on securities litigation.

Prior to joining KSF, Ms. Pratt clerked in federal court in the Eastern District of Texas for the Honorable John D. Love and in the Supreme Court of Virginia for the Honorable Senior Justice Charles S. Russell. While at the Supreme Court of Virginia, Ms. Pratt also served as the law clerk for the Office of the Chief Staff Attorney.



Ms. Pratt received her J.D., *cum laude*, from William & Mary Law School, where she was a member of the Bill of Rights Journal. During her time in law school, Ms. Pratt served as the chief of staff of the Center for Legal and Court Technology and interned with the United States Attorney's Office in the Eastern District of Virginia and the general counsel's office of Huntington Ingalls, the largest military



**Kahn Swick & Foti, LLC**

shipbuilding company in the United States. She received her undergraduate degrees from the University of Virginia.

Ms. Pratt is admitted to practice in Virginia.

**Rhosean Scott**

Rhosean Scott is a staff attorney for the firm and focuses primarily on federal securities class action litigation.

Prior to joining KSF, Ms. Scott worked at several New York litigation boutiques representing plaintiffs in complex securities class actions. She has extensive experience investigating and conducting discovery in securities fraud and antitrust matters on behalf of individual and institutional investors. As part of the KSF team, Ms. Scott is currently prosecuting *In re Parateum Securities Litigation*, *Sam Farrar v. Workhorse Group Inc. et al.*, and *Pearlstein v. Blackberry Ltd., et al.*



Ms. Scott is a graduate of Tulane University Law School and served as a judicial law clerk to the Hon. Charles R. Jones of the Louisiana Fourth Circuit Court of Appeal. She received a B.A. in Economics from Emory University.

Ms. Scott is admitted to practice in New York.

# EXHIBIT 4

Juan E. Monteverde (admitted *pro hac vice*, NY Reg. No. 4467882)  
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 The Empire State Building  
 350 Fifth Avenue, Suite 4740  
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David E. Bower (SBN 119546)  
 MONTEVERDE & ASSOCIATES PC  
 600 Corporate Pointe, Suite 1170  
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 Tel: (213) 446-6652  
 Fax: (212) 202-7880  
 dbower@monteverdelaw.com

*Counsel for Co-Lead Plaintiffs and  
 Class Counsel*

[Additional Counsel on Signature Page]

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

Master File No. 3:20-CV-06733-MMC

IN RE AIMMUNE THERAPEUTICS, INC.  
 SECURITIES LITIGATION

Hearing: July 18, 2025  
 Time: 9:00 a.m.  
 Court: Courtroom 7, 19th Floor  
 Judge: Hon. Maxine M. Chesney

**DECLARATION OF PLAINTIFF CECILIA PEMBERTON**

I, Cecilia Pemberton, hereby declare as follows:

1. I am a Court-appointed Co-Lead Plaintiff and Class Representative (“Plaintiff”) in the above-captioned class action (“Action”), and I held 300 shares of Aimmune Therapeutics, Inc. common stock prior to the announcement of the Merger and through its consummation via a tender offer.

2. I am a retired health care administrator and reside in Narberth, Pennsylvania.

3. I submit this declaration in support of the Settlement and my request for a service award in the amount of \$5,000 for the time I have spent actively engaged as a Plaintiff in this Action.

4. During the last four and a half years, I have regularly communicated with Michael Palestina at Kahn Swick & Foti, LLC regarding this Action and participated in the following tasks: (i) reviewed and/or discussed various substantive pleadings, including (but not limited to) the amended class action complaint, the motion seeking my appointment as Co-Lead Plaintiff, Defendants’ motion to dismiss and related briefing, Defendants’ other dispositive briefing, Plaintiffs’ motion for class certification, pursuant to which I was appointed a Class Representative, and the parties’ various respective motions for summary judgment and *Daubert* motions and related briefing; (ii) responded to written discovery requests; (iii) gathered and produced relevant documents; (iv) sat for a deposition; (v) considered and discussed potential settlement and mediation; and (vi) reviewed and/or discussed papers related to the settlement.

5. In my role as Plaintiff, I devoted at least 60 hours of my time to this Action. Accordingly, I seek an award of \$5,000 for the time and expenses I incurred directly relating to my representation of the Settlement Class in this Action.

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 4/30/2025

Signed by:

Cecilia Pemberton

0BB66ECF5749461...

Cecilia Pemberton

# EXHIBIT 5

Juan E. Monteverde (admitted *pro hac vice*, NY Reg. No. 4467882)  
 MONTEVERDE & ASSOCIATES PC  
 The Empire State Building  
 350 Fifth Avenue, Suite 4740  
 New York, New York 10118  
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 Fax: (212) 202-7880  
 dbower@monteverdelaw.com

*Counsel for Co-Lead Plaintiffs and  
 Co-Lead Counsel for the Class*

[Additional Counsel on Signature Page]

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

Master File No. 3:20-CV-06733-MMC

IN RE AIMMUNE THERAPEUTICS, INC.  
 SECURITIES LITIGATION

Hearing: July 18, 2025  
 Time: 9:00 a.m.  
 Court: Courtroom 7, 19th Floor  
 Judge: Hon. Maxine M. Chesney

**DECLARATION OF PLAINTIFF BRUCE SVITAK**

I, Bruce Svitak, hereby declare as follows:

1. I am a Court-appointed Co-Lead Plaintiff and Class Representative (“Plaintiff”) in the above-captioned class action (“Action”), and I held 8,572 shares of Aimmune Therapeutics, Inc. common stock prior to the announcement of the Merger and through its consummation via a tender offer.

2. I am a retired supervisor for the Minneapolis Post Office with the U.S. Postal Service and reside in Bloomer, Wisconsin.

3. I submit this declaration in support of the Settlement and my request for a service award in the amount of \$5,000 for the time I have spent actively engaged as a Plaintiff in this Action.

4. During the last four and a half years, I have regularly communicated with Juan E. Monteverde with Monteverde & Associates PC, both via email and telephone, regarding this Action.

5. I reviewed pleadings and various briefs in the case. I also discussed with Mr. Monteverde the Defendants’ multiple attempts to dismiss this Action and the summary judgment motions filed before a settlement was reached.

6. In addition, I gathered and produced relevant documents and responded to various sets of interrogatories and admissions from Defendants. Furthermore, I traveled to New York City to prepare for my deposition and have my deposition taken by Defendants.

7. Lastly, I discussed with Monteverde the potential trial in the case and the Settlement obtained in the case.

8. I have devoted over 60 hours of my time to this Action, including travel time to New York City, and seek an award of \$5,000 for the time and expenses I incurred in this Action.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 5/1/2025

Signed by:  
  
 Bruce Svitak

# EXHIBIT 6



Juan E. Monteverde (admitted *pro hac vice*, NY Reg. No. 4467882)  
 MONTEVERDE & ASSOCIATES PC  
 The Empire State Building  
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 dbower@monteverdelaw.com

*Counsel for Co-Lead Plaintiffs and  
 Co-Lead Counsel for the Class*

[Additional Counsel on Signature Page]

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

Master File No. 3:20-CV-06733-MMC

IN RE AIMMUNE THERAPEUTICS, INC.  
 SECURITIES LITIGATION

Hearing: July 18, 2025  
 Time: 9:00 a.m.  
 Court: Courtroom 7, 19th Floor  
 Judge: Hon. Maxine M. Chesney

**DECLARATION OF PLAINTIFF BARBARA SVITAK**

I, Barbara Svitak, hereby declare as follows:

1. I am a Court-appointed Co-Lead Plaintiff (“Plaintiff”) in the above-captioned class action (“Action”), and I held 1,358 shares of Aimmune Therapeutics, Inc. common stock prior to the announcement of the Merger and through its consummation via a tender offer.

2. I am a retired clerk with the U.S. Postal Service and reside in Bloomer, Wisconsin.

3. I submit this declaration in support of the Settlement and my request for a service award in the amount of \$5,000 for the time I have spent actively engaged as a Plaintiff in this Action.

4. During the last four and a half years, I have regularly communicated with Juan E. Monteverde with Monteverde & Associates PC, both via email and telephone, regarding this Action.

5. I reviewed pleadings and various briefs in the case. I also discussed with Mr. Monteverde the Defendants’ multiple attempts to dismiss this Action and the summary judgment motions filed before a settlement was reached.

6. In addition, I gathered and produced relevant documents and responded to various sets of interrogatories and admissions from Defendants. Furthermore, I traveled to New York City to prepare for my deposition and have my deposition taken by Defendants.

7. Lastly, I discussed with Monteverde the potential trial in the case and the Settlement obtained in the case.

8. I have devoted over 50 hours of my time to this Action, including travel time to New York City, and seek an award of \$5,000 for the time and expenses I incurred in this Action.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 4/29/2025

Signed by:

  
24D4F826492841A  
Barbara Svitak

# EXHIBIT 7

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Baylet, John</b>										
09-15-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Baylet, John			1.600	575.00	920.00
				01 - Case Development, Investigation and review corporate filings Review and analyze D-9 and other SEC filing and public information; investigate damages case; run financial analysis on disclosed projections; discuss case strategy						
09-17-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Baylet, John			1.200	575.00	690.00
				01 - Case Development, Investigation and review corporate filings Review and analyze recommendation statement and case law; discuss case strategy						
09-24-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Baylet, John			1.200	575.00	690.00
				01 - Case Development, Investigation and review corporate filings Review and analyze SEC filings and other public information; discuss case strategy with managing partner and co-counsel						
09-29-2021	Approved		Billable	02 - Pleading	Baylet, John			1.100	575.00	632.50
				02 - Pleading Draft and edit amended complaint						
09-30-2021	Approved		Billable	02 - Pleading	Baylet, John			6.500	575.00	3,737.50
				02 - Pleading Review and analyze case file and public documents; discuss case strategy with senior associate and co-counsel; draft edit finalize and file amended complaint						
11-29-2021	Approved		Billable	05 - Motion	Baylet, John			2.200	575.00	1,265.00
				05 - Motion Review and analyze case file; review and analyze MTD; discuss case strategy with managing partner, senior associate, and co-counsel						
01-11-2022	Approved		Billable	05 - Motion	Baylet, John			1.400	575.00	805.00
				05 - Motion Review and edit MTD Opp						
04-25-2022	Approved		Billable	06 - Preparation Hearing/Trial	Baylet, John			1.400	575.00	805.00
				06 - Preparation Hearing/Trial Review and analyze case file, including 14d-9 and MTD briefing; discuss hearing strategy with managing partner and senior associate; review and analyze MTD ppt						
04-26-2022	Approved		Billable	06 - Preparation Hearing/Trial	Baylet, John			0.600	575.00	345.00
				06 - Preparation Hearing/Trial Review and analyze case file and MTD ppt						

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b>Aimmune Therapeutics</b>										
<b><u>Merger</u></b>										
<b>Baylet, John</b>										
04-28-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Baylet, John			4.600	575.00	2,645.00
				06 - Preparation Hearing/Trial Draft, edit, and finalize MTD ppt						
04-29-2022	Approved		Billable	07 - Court Hearing	Baylet, John			1.500	575.00	862.50
				07 - Court Hearing MTD Hearing						
04-29-2022	Approved		Billable	14 - Meeting/Strategy	Baylet, John			0.400	575.00	230.00
				14 - Meeting/Strategy Meet with managing partner, senior associate, and co-counsel to discuss post-MTD case strategy						
05-11-2022	Approved		Billable	03 - Discovery	Baylet, John			0.400	575.00	230.00
				03 - Discovery Review and analyze CMC and 26F; discuss same with managing partner						
05-12-2022	Approved		Billable	03 - Discovery	Baylet, John			4.600	575.00	2,645.00
				03 - Discovery Review and edit CMC Statement and 26F Report						
05-25-2022	Approved		Billable	02 - Pleading	Baylet, John			1.200	575.00	690.00
				02 - Pleading Review and analyze Def answer to AC						
05-26-2022	Approved		Billable	11 - Correspondence/ Communications	Baylet, John			0.400	575.00	230.00
				11 - Correspondence/Communications Prepare for and meet and confer with Def counsel						
06-04-2022	Approved		Billable	03 - Discovery	Baylet, John			0.600	575.00	345.00
				03 - Discovery Discuss Def proposed 12(c) motion						
06-06-2022	Approved		Billable	03 - Discovery	Baylet, John			0.800	575.00	460.00
				03 - Discovery Review and edit 26F report						
<b>Professional Total</b>								<b>31.700</b>		<b>18,227.50</b>
<b>Bower, David</b>										
09-25-2020	Approved		Billable	14 - Meeting/Strategy	Bower, David			0.300	825.00	247.50
				14 - Meeting/Strategy - Review correspondence from JM re handling of new matter and discussion						
09-25-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Review and discuss PSLRA statement.						
09-25-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Review and discuss draft of complaint						

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
09-25-2020	Approved		Billable	15 - Research	Bower, David			0.200	825.00	165.00
				15 - Research - Research and discussions as to proper filing court and venue						
09-25-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Bower, David			0.300	825.00	247.50
				01 - Case Development, Investigation and review corporate filings - Amendment and edits to filing documents to file with court						
09-25-2020	Approved		Billable	02 - Pleading	Bower, David			1.000	825.00	825.00
				02 - Pleading - Filing of complaint and all related and necessary documents for start of case						
09-26-2020	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.200	825.00	165.00
				11 - Correspondence/Communications - Notations from filing court						
09-26-2020	Approved		Billable	02 - Pleading	Bower, David			0.500	825.00	412.50
				02 - Pleading - Refiling of complaint and dismissal of prior action						
09-28-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Notes regarding court's assignment for Scheduling Order						
10-16-2020	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.600	825.00	495.00
				11 - Correspondence/Communications - correspondence and discussions regarding service and waiver of service with defense counsel						
10-19-2020	Approved		Billable	02 - Pleading	Bower, David			0.300	825.00	247.50
				02 - Pleading - Corrected filing and issuance of Summons						
10-19-2020	Approved		Billable	02 - Pleading	Bower, David			0.400	825.00	330.00
				02 - Pleading - Filing of POS and related summons						
10-20-2020	Approved		Billable	17 - Case Schedule/CMC/ Reports	Bower, David			0.200	825.00	165.00
				17 - Case Schedule/CMC/Reports - Notice re Clerk's setting of Initial CMC and continuance of same						
10-24-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Review and comments regarding Stipulation re service and scheduling						
11-17-2020	Approved		Billable	02 - Pleading	Bower, David			0.200	825.00	165.00
				02 - Pleading - Filing re Service Proof						
11-17-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review correspondence with defense counsel and note to file						
11-18-2020	Approved		Billable	02 - Pleading	Bower, David			0.400	825.00	330.00
				02 - Pleading - Filing stipulation and Proposed Order						
11-24-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50

**Time Entries****Monteverde & Associates PC**

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
12 - Analyze and review - Receipt and review and calendar matters per court order re stipulation										
12-11-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.800	825.00	660.00
12 - Analyze and review - Review and comment regarding Briefing on Lead motion										
12-11-2020	Approved		Billable	14 - Meeting/Strategy	Bower, David			1.200	825.00	990.00
14 - Meeting/Strategy - Discussions and coordination with associate regarding formating and content to edit briefing										
12-14-2020	Approved		Billable	12 - Analyze and review	Bower, David			2.300	825.00	1,897.50
12 - Analyze and review - multiple filings and edits to documents to conform with format requirements										
12-16-2020	Approved		Billable	05 - Motion	Bower, David			0.500	825.00	412.50
05 - Motion - Filing of Pro Hac Motion										
12-22-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
12 - Analyze and review - receipt and review and filing of Court Orders										
12-23-2020	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
12 - Analyze and review - receipt and review and filing of Court Orders										
12-28-2020	Approved		Billable	12 - Analyze and review	Bower, David			1.400	825.00	1,155.00
12 - Analyze and review - check over and coordinate filing of new motions re Lead										
12-29-2020	Approved		Billable	05 - Motion	Bower, David			0.500	825.00	412.50
05 - Motion - Refiling Motion and following order regarding proper notice and filing										
01-04-2021	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.400	825.00	330.00
17 - Case Schedule/CMC/Reports - Note as to new judge (William Orrick) and new CMC dates and calendar										
01-04-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.100	825.00	82.50
12 - Analyze and review - Receipt and review of notice to clerk										
01-04-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
12 - Analyze and review - Note re Order reassigning case to Judge Chesney										
01-05-2021	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.200	825.00	165.00
17 - Case Schedule/CMC/Reports - Note and calendar new dates for CMC										
01-16-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
12 - Analyze and review - Review motion for refiling										
01-16-2021	Approved		Billable	05 - Motion	Bower, David			0.700	825.00	577.50
05 - Motion - Assist refiling of motion for Lead										
02-10-2021	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.300	825.00	247.50
17 - Case Schedule/CMC/Reports - Calendar check regarding two cases and multiple judges assignments										

**Time Entries****Monteverde & Associates PC**

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
02-10-2021	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.200	825.00	165.00
				17 - Case Schedule/CMC/Reports - Monitor correspondence re scheduling						
02-11-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - Review and discussion regarding Stipulation re filing new consolidated complaint						
02-12-2021	Approved		Billable	05 - Motion	Bower, David			0.200	825.00	165.00
				05 - Motion - Filing Stipulation						
02-16-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - Review clerks order and calendar events						
02-17-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review Order calendar events in Order						
02-22-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - review submission of Proposed order						
03-15-2021	Approved		Billable	14 - Meeting/Strategy	Bower, David			0.800	825.00	660.00
				14 - Meeting/Strategy - discussions regarding related case and stipulation						
03-17-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review Order and calendar adjustments						
09-14-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review and discussion regarding Status Report and stipulation						
09-16-2021	Approved		Billable	05 - Motion	Bower, David			0.200	825.00	165.00
				05 - Motion - Filing Stipulation						
09-17-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review Order and calendar events						
09-30-2021	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Review of Amended consolidated complaint and prepare for filing						
11-23-2021	Approved		Billable	12 - Analyze and review	Bower, David			1.500	825.00	1,237.50
				12 - Analyze and review - Review filing of Motion to Dismiss and read P&As						
11-25-2021	Approved		Billable	12 - Analyze and review	Bower, David			2.300	825.00	1,897.50
				12 - Analyze and review - Review Exhibits, declarations and analysis with Points and authorities						
01-03-2022	Approved		Billable	15 - Research	Bower, David			0.200	825.00	165.00
				15 - Research - Review and research regarding brief						
01-11-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.700	825.00	577.50
				12 - Analyze and review - Review briefs ahead of filing						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
01-21-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Review stip for filing						
01-21-2022	Approved		Billable	05 - Motion	Bower, David			0.400	825.00	330.00
				05 - Motion - Filing under nexGen new passwords						
01-24-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review signed Order and adjust calendar						
02-16-2022	Approved		Billable	12 - Analyze and review	Bower, David			1.800	825.00	1,485.00
				12 - Analyze and review - Review Reply brief and discuss with co-counsel						
02-18-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Review Court's Order regarding hearing						
03-01-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review and report re Order overruling objections						
03-02-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review and revise Stipulation re hearing dates						
03-03-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Review Order and adjust calendar						
03-12-2022	Approved		Billable	05 - Motion	Bower, David			0.300	825.00	247.50
				05 - Motion - Filing sur Reply after discussion and review of format and content						
03-28-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Review filing by court and adjustment to calendar						
04-26-2022	Approved		Billable	12 - Analyze and review	Bower, David			1.600	825.00	1,320.00
				12 - Analyze and review - review Argument slides and provide feedback						
04-28-2022	Approved		Billable	06 - Preparation Hearing/Trial	Bower, David			1.800	825.00	1,485.00
				06 - Preparation Hearing/Trial - Read and prepare for discussion all bullet points for the MTD argument						
04-29-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - Read court's Ruling and calendar items after MTD defeated						
05-05-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - review Stip re timeline for answer and calendar						
05-11-2022	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.400	825.00	330.00
				17 - Case Schedule/CMC/Reports - Review and discuss 26(F) report						
05-11-2022	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.300	825.00	247.50
				17 - Case Schedule/CMC/Reports - review CMC Stmt						

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
05-20-2022	Approved		Billable	12 - Analyze and review	Bower, David			1.100	825.00	907.50
				12 - Analyze and review - Review answer to amended consolidated complaint.						
05-24-2022	Approved		Billable	11 - Correspondence/Communications	Bower, David			0.600	825.00	495.00
				11 - Correspondence/Communications - Review correspondence back and forth with defense counsel regarding 26(F) issues.						
06-03-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Recdeipt and review Defendant's edits and suggestions re 26(F)						
06-09-2022	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.200	825.00	165.00
				17 - Case Schedule/CMC/Reports - Filing of Case Management Statement						
06-09-2022	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.200	825.00	165.00
				17 - Case Schedule/CMC/Reports - Filing of 26(f) report						
06-09-2022	Approved		Billable	12 - Analyze and review	Bower, David			1.300	825.00	1,072.50
				12 - Analyze and review - Receipt and review and notation of Defendants initial disclosures						
06-10-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - Review draft of our initial disclosures						
06-17-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Review court's scheduling order and enter on Calendar						
07-01-2022	Approved		Billable	12 - Analyze and review	Bower, David			1.000	825.00	825.00
				12 - Analyze and review - Review and discuss RtP to send to Defendants						
07-27-2022	Approved		Billable	12 - Analyze and review	Bower, David			1.400	825.00	1,155.00
				12 - Analyze and review - Receipt and Review of transcrip re arguments at MTD hearing						
08-01-2022	Approved		Billable	03 - Discovery	Bower, David			2.000	825.00	1,650.00
				03 - Discovery - Receipt and review of discovery responses from defendants						
08-16-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - review discovery dispute letter filed previously in March for context.						
08-22-2022	Approved		Billable	12 - Analyze and review	Bower, David			1.000	825.00	825.00
				12 - Analyze and review - Review and input regarding Confidentiality Agreement						
08-25-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Receipt of signed Protective Order						
08-31-2022	Approved		Billable	05 - Motion	Bower, David			1.800	825.00	1,485.00
				05 - Motion - Receipt and Review of Motion forJOP from Aimmune						
09-07-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - receipt and review of proposed stipulation						

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
09-08-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - Receive court order re scheduling and update calendar						
09-14-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.800	825.00	660.00
				12 - Analyze and review - receive documents from defendants and review						
09-18-2022	Approved		Billable	03 - Discovery	Bower, David			1.600	825.00	1,320.00
				03 - Discovery - Receipt and review of discovery requests from defendants						
09-23-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				03 - Discovery - Review our response to JOP motion						
09-26-2022	Approved		Billable	03 - Discovery	Bower, David			0.800	825.00	660.00
				03 - Discovery - Receipt and review discovery documents from defendants						
10-08-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - Review of ESI parameters proposed						
10-10-2022	Approved		Billable	05 - Motion	Bower, David			1.500	825.00	1,237.50
				05 - Motion - Receipt and review of Reply re Motion JOP						
10-18-2022	Approved		Billable	14 - Meeting/Strategy	Bower, David			0.600	825.00	495.00
				14 - Meeting/Strategy - discussions regarding insurance coverage issues.6						
10-21-2022	Approved		Billable	03 - Discovery	Bower, David			1.300	825.00	1,072.50
				03 - Discovery - Production by defendants, review of same						
10-28-2022	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - review our responses to discovery						
12-07-2022	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.800	825.00	660.00
				11 - Correspondence/Communications - Review of emails back and forth regarding discovery and ESI issues						
12-22-2022	Approved		Billable	05 - Motion	Bower, David			1.000	825.00	825.00
				05 - Motion - Receipt and review motion re appealability filed by defendants						
12-26-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Bower, David			0.300	825.00	247.50
				17 - Case Schedule/CMC/Reports - Review Stip for filing re Scheduling Order						
12-28-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Bower, David			0.500	825.00	412.50
				17 - Case Schedule/CMC/Reports - receipt of Order re scheduling and calendar events						
01-05-2023	Approved		Billable	17 - Case Schedule/CMC/ Reports	Bower, David			0.200	825.00	165.00

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
				17 - Case Schedule/CMC/Reports - Stipulation re scheduling of hearing						
01-11-2023	Approved		Billable	03 - Discovery	Bower, David			0.400	825.00	330.00
				03 - Discovery - Review of hit report re ESI discovery						
01-22-2023	Approved		Billable	03 - Discovery	Bower, David			0.400	825.00	330.00
				03 - Discovery - review and comment regarding discovery issues for ESI						
01-23-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Review Proposed order						
01-24-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.600	825.00	495.00
				12 - Analyze and review - Review Subpoenas for form and service						
01-25-2023	Approved		Billable	05 - Motion	Bower, David			0.300	825.00	247.50
				05 - Motion - Review Opposition to Motion 1292						
01-26-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Receipt and review and discuss service copy of subpoena on Nestle						
02-02-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Receipt and review memo from Chase counsel re Subpoena						
02-03-2023	Approved		Billable	05 - Motion	Bower, David			0.800	825.00	660.00
				05 - Motion - Receipt and review of reply brief re 1292 motion						
02-11-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - review of Production of documents from plaintiff						
02-22-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.700	825.00	577.50
				12 - Analyze and review - Receipt and review of objections from JP Morgasn Chase to subpoena						
02-22-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Receipt and review of objections by Nestle						
02-24-2023	Approved		Billable	11 - Correspondence/Communications	Bower, David			0.300	825.00	247.50
				11 - Correspondence/Communications - Correspondence from Bof A re subpoena						
02-24-2023	Approved		Billable	05 - Motion	Bower, David			0.300	825.00	247.50
				05 - Motion - Order Denying motion for interlocutory appeal						
03-01-2023	Approved		Billable	11 - Correspondence/Communications	Bower, David			0.300	825.00	247.50
				11 - Correspondence/Communications - correspondence regarding subpoenas and responses received.						
03-10-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Receipt and review of Objections to Subpoena and responses from B of A.						
03-13-2023	Approved		Billable	05 - Motion	Bower, David			0.600	825.00	495.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
05 - Motion - Receipt and review of Motion for Order under Hague										
03-13-2023	Approved		Billable	05 - Motion	Bower, David			0.200	825.00	165.00
05 - Motion - Review motion re filing										
03-24-2023	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.500	825.00	412.50
11 - Correspondence/Communications - Receipt and review of letter regarding production by defendants										
03-24-2023	Approved		Billable	03 - Discovery	Bower, David			0.300	825.00	247.50
03 - Discovery - Receipt and review of letter and discovery from aimune										
03-27-2023	Approved		Billable	05 - Motion	Bower, David			0.400	825.00	330.00
05 - Motion - Receipt and rev of Opposition to Motion re Letters										
03-31-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
12 - Analyze and review - Receipt and review of supplemental production by defendants										
04-01-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
12 - Analyze and review - receipt and review first production of documents										
04-11-2023	Approved		Billable	14 - Meeting/Strategy	Bower, David			0.200	825.00	165.00
14 - Meeting/Strategy - receipt and review of court order and discuss with co-counsel										
04-13-2023	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.500	825.00	412.50
11 - Correspondence/Communications - Correspondence and discussions regarding discovery by way of production to the court.										
04-17-2023	Approved		Billable	03 - Discovery	Bower, David			0.500	825.00	412.50
03 - Discovery - Receipt and review supplemental discovery responses and documents										
04-20-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
12 - Analyze and review - Receipt and review of Objections to subpoena from Lazard Freres										
04-28-2023	Approved		Billable	12 - Analyze and review	Bower, David			1.200	825.00	990.00
12 - Analyze and review - Receipt and review of privilege log and documents produced										
05-04-2023	Approved		Billable	03 - Discovery	Bower, David			1.000	825.00	825.00
Receipt and review of discovery from Aimmune										
05-12-2023	Approved		Billable	03 - Discovery	Bower, David			0.300	825.00	247.50
03 - Discovery - receipt and review of discovery										
05-26-2023	Approved		Billable	03 - Discovery	Bower, David			0.800	825.00	660.00
03 - Discovery - Receipt and review of documents in discovery from defendants										
06-05-2023	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.300	825.00	247.50
11 - Correspondence/Communications - review letter from David Polk re Lazard										
06-10-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
12 - Analyze and review - Review Stipulation and revised Order										
06-13-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.500	825.00	412.50
17 - Case Schedule/CMC/Reports - Receipt of Order regarding scheduling and enter in Calendar										
06-22-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.400	825.00	330.00
17 - Case Schedule/CMC/Reports - Review of Proposed litigation schedule by defense										
06-23-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Bower, David			0.500	825.00	412.50
17 - Case Schedule/CMC/Reports - Review of Minute Order and entry of dates in calendar										
06-29-2023	Approved		Billable	11 - Correspondence/Communications	Bower, David			0.200	825.00	165.00
11 - Correspondence/Communications - Court receipt of documents and review of correspondence regarding same										
06-30-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
12 - Analyze and review - Receipt of documents and review from B of A										
07-05-2023	Approved		Billable	12 - Analyze and review	Bower, David			1.000	825.00	825.00
12 - Analyze and review - Receipt and review of Nestle production										
08-24-2023	Approved		Billable	03 - Discovery	Bower, David			1.500	825.00	1,237.50
03 - Discovery - Review and monitor correspondence regarding ESI discovery										
09-08-2023	Approved		Billable	11 - Correspondence/Communications	Bower, David			0.800	825.00	660.00
11 - Correspondence/Communications - Receive letter from David Polk re Lazard additional production and forward to NY office										
09-15-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.700	825.00	577.50
12 - Analyze and review - Receipt review and forward additional documents from David Polk										
09-25-2023	Approved		Billable	11 - Correspondence/Communications	Bower, David			0.100	825.00	82.50
11 - Correspondence/Communications - Correspondence review from Defense counsel										
09-25-2023	Approved		Billable	11 - Correspondence/Communications	Bower, David			0.100	825.00	82.50
11 - Correspondence/Communications - Receipt and review communications between counsel										
09-26-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.100	825.00	82.50
12 - Analyze and review - Review correspondence and calendar										
09-27-2023	Approved		Billable	03 - Discovery	Bower, David			0.200	825.00	165.00
03 - Discovery - Review of correspondence re Discovery production										

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
10-03-2023	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.200	825.00	165.00
				11 - Correspondence/Communications - Review order re status and communications with opposing counsel						
10-03-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - review correspondence regarding discovery issues to offer input						
10-10-2023	Approved		Billable	11 - Correspondence/ Communications	Bower, David			0.300	825.00	247.50
				11 - Correspondence/Communications - receipt and review of correspondence concerning discovery deadlines and record						
10-12-2023	Approved		Billable	03 - Discovery	Bower, David			2.200	825.00	1,815.00
				03 - Discovery - Review drafts of discovery to defendants						
10-13-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.400	825.00	330.00
				12 - Analyze and review - Receipt and review of protective order proposal						
10-16-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Receipt and review of Lazard further production						
10-19-2023	Approved		Billable	04 - Deposition	Bower, David			0.400	825.00	330.00
				04 - Deposition - Monitor and review ongoing correspondence regarding deposition scheduling.						
10-20-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.600	825.00	495.00
				12 - Analyze and review - Receipt review and forwarding of documents produced by JP Morgan Chase						
10-26-2023	Approved		Billable	17 - Case Schedule/CMC/ Reports	Bower, David			1.000	825.00	825.00
				17 - Case Schedule/CMC/Reports - Review stipulation regarding scheduling						
11-01-2023	Approved		Billable	04 - Deposition	Bower, David			0.300	825.00	247.50
				04 - Deposition - review of deposition notices						
11-06-2023	Approved		Billable	04 - Deposition	Bower, David			0.500	825.00	412.50
				04 - Deposition - Correspondence reveiw and discussion concerning scheduling of numerous depositions						
11-07-2023	Approved		Billable	14 - Meeting/Strategy	Bower, David			0.800	825.00	660.00
				14 - Meeting/Strategy - Discussions with associate regarding multi language depositions						
11-08-2023	Approved		Billable	03 - Discovery	Bower, David			0.300	825.00	247.50
				03 - Discovery - Review stipulation re discovery						
11-13-2023	Approved		Billable	03 - Discovery	Bower, David			0.400	825.00	330.00
				03 - Discovery - Receipt and review of responses to discovery from Aimmune						
12-05-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Review and comment regarding scheduling Stipulation/Order						
12-07-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.800	825.00	660.00
				12 - Analyze and review - Finalizing and filing Stipulation and Proposed Scheduling Order						



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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
12-28-2023	Approved		Billable	12 - Analyze and review	Bower, David			0.700	825.00	577.50
				12 - Analyze and review - Receipt of production from Aimmune and forward						
01-16-2024	Approved		Billable	14 - Meeting/Strategy	Bower, David			0.600	825.00	495.00
				14 - Meeting/Strategy - Converse with associate and review subpoena for service						
02-11-2024	Approved		Billable	03 - Discovery	Bower, David			1.000	825.00	825.00
				03 - Discovery - Review discovery RfAs to us and interrogatories and discuss with associate and partner as to how to respond						
02-23-2024	Approved		Billable	13 - Experts	Bower, David			1.200	825.00	990.00
				13 - Experts - Receipt and review of Jeffers expert report						
03-05-2024	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Review Proposed stipulation re Briefing schedule for Class cert						
03-08-2024	Approved		Billable	05 - Motion	Bower, David			1.000	825.00	825.00
				05 - Motion - Review Motion to Certify class						
03-12-2024	Approved		Billable	09 - Settlement/Mediation	Bower, David			0.400	825.00	330.00
				09 - Settlement/Mediation - Review letter proposal settlement demand						
03-12-2024	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Order on stip re briefing schedule and note calendar						
03-18-2024	Approved		Billable	03 - Discovery	Bower, David			2.600	825.00	2,145.00
				03 - Discovery - Review responses to discovery and finalize						
03-19-2024	Approved		Billable	12 - Analyze and review	Bower, David			2.000	825.00	1,650.00
				12 - Analyze and review - Receipt and review of defendants responses to RfA and Interrogatories						
04-01-2024	Approved		Billable	03 - Discovery	Bower, David			1.000	825.00	825.00
				03 - Discovery - Receipt and review of Dallas' discovery responses						
04-02-2024	Approved		Billable	03 - Discovery	Bower, David			1.800	825.00	1,485.00
				03 - Discovery - Receipt and review of Aimmune Responses to discovery						
04-16-2024	Approved		Billable	04 - Deposition	Bower, David			0.400	825.00	330.00
				04 - Deposition - Review of Deposition Notice for service						
04-17-2024	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Receipt of files from Latham						
04-19-2024	Approved		Billable	12 - Analyze and review	Bower, David			0.500	825.00	412.50
				12 - Analyze and review - Receipt of additional production from Lathan						
04-22-2024	Approved		Billable	05 - Motion	Bower, David			0.800	825.00	660.00
				05 - Motion - Receipt and review of Opposition to Motion to Certify class						
05-21-2024	Approved		Billable	05 - Motion	Bower, David			0.300	825.00	247.50
				05 - Motion - Review for filing reply Brief re Clss Cert						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Bower, David</b>										
05-24-2024	Approved		Billable	12 - Analyze and review	Bower, David			0.200	825.00	165.00
				12 - Analyze and review - Receipt and review of Order granting class cert						
06-14-2024	Approved		Billable	05 - Motion	Bower, David			1.500	825.00	1,237.50
				05 - Motion - regarding MSJ and Daubert motion filing						
06-23-2024	Approved		Billable	13 - Experts	Bower, David			0.500	825.00	412.50
				13 - Experts - Receipt and review of Expert report from Defense						
06-27-2024	Approved		Billable	12 - Analyze and review	Bower, David			0.300	825.00	247.50
				12 - Analyze and review - Receipt and review of sealed documents for filing from defense						
07-08-2024	Approved		Billable	09 - Settlement/Mediation	Bower, David			0.800	825.00	660.00
				09 - Settlement/Mediation - Review proposed joint statment						
10-09-2024	Approved		Billable	12 - Analyze and review	Bower, David			0.600	825.00	495.00
				12 - Analyze and review - Review Voir Dire questions and comments						
10-27-2024	Approved		Billable	06 - Preparation Hearing/Trial	Bower, David			1.500	825.00	1,237.50
				06 - Preparation Hearing/Trial - Review trial preparation documents for comments						
10-30-2024	Approved		Billable	05 - Motion	Bower, David			1.200	825.00	990.00
				05 - Motion - Review notes regarding argument for MSJ						
11-07-2024	Approved		Billable	09 - Settlement/Mediation	Bower, David			0.500	825.00	412.50
				09 - Settlement/Mediation - Notice of Settlement and discussions regarding remaining hearings and appearance						
<b>Professional Total</b>								<b>111.500</b>		<b>91,987.50</b>
<b><i>Keller, Beth</i></b>										
11-10-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.500	800.00	400.00
				Review email corr from JM re schedule for prep of settlement docs and review stip template						
11-12-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			4.900	800.00	3,920.00
				Draft Stipulation of Settlement; review docket and case filings for same.						
11-13-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			4.100	800.00	3,280.00
				Draft Stipulation of Settlement; review N.D. Cal. Procedural Guidelines						
11-14-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			2.700	800.00	2,160.00
				Draft Stipulation of Settlement and email same to JM, MP and MS						
11-15-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			2.300	800.00	1,840.00
				t.c. JM re stipulation of settlement; review edits to stip.; finalize stip and email to defs' counsel						
11-18-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			5.500	800.00	4,400.00
				Draft exhibits to stipulation of settlement						
11-19-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			5.300	800.00	4,240.00
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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Keller, Beth</b>										
Draft exhibits to stipulation of settlement										
11-19-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.700	800.00	560.00
t.c. M. Schreiner re proposed plan of allocation and email corr w/ JM and MS re same										
11-20-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			3.400	800.00	2,720.00
Finalize draft exhibits to stipulation of settlement and email same to JM, MP and MS										
11-20-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.400	800.00	320.00
Email corr w/ MS and JM re settlement strategy and t.c. JM re same										
11-20-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.300	800.00	240.00
t.c. w/ M. Palestina re legal research, N.D. Cal guidelines										
11-21-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.500	800.00	400.00
Correspondence w/ MP, JM and MS re stipulation of settlement exhibits										
11-22-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			2.200	800.00	1,760.00
Edits to stipulation exhibits										
11-22-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			1.100	800.00	880.00
t.c. and email corr w/ JM and MS re stip exhibits and email exhs to defense counsel										
11-26-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.200	800.00	160.00
Email corr w/ JM and MP re N.D. Cal. Guidelines for Class Action Settlements										
11-27-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			2.400	800.00	1,920.00
09 - Settlement/Mediation										
12-04-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			2.500	800.00	2,000.00
Legal research re service awards in ND Cal; draft email summary re same										
12-11-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			1.300	800.00	1,040.00
Review defendants' edits to stipulation and exhibits; t.c. JM and email corr with JM and MP re same										
12-12-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			3.500	800.00	2,800.00
Further edits to stipulation of settlement; t.c. DG re edits to stipulation; email overview to JM, MS, MP and update with changes; email further edits to defs										
12-17-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.200	800.00	160.00
Email corr with JM and MS re preliminary approval brief										
12-17-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.200	800.00	160.00
Email correspondence to defendants re settlement documents and review status re same										
12-18-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.400	800.00	320.00
Review preliminary approval brief and email corr w/co-counsel re same										
12-20-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			1.000	800.00	800.00
Review preliminary approval brief; email to MS										

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Keller, Beth</b>										
12-24-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			1.300	800.00	1,040.00
	Email corr w/ JM and MP re settlement documents; review defs' edits to settlement documents									
12-25-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.200	800.00	160.00
	Review email corr with JM and MP re settlement documents and edits									
12-26-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			1.500	800.00	1,200.00
	Review settlement documents; email to JM and MS re same									
12-29-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			3.400	800.00	2,720.00
	Review stipulation of settlement and exhibits and edits to the same; email to JM and MP re same									
12-30-2024	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.700	800.00	560.00
	Review edits to settlement documents and send to defs									
01-02-2025	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.200	800.00	160.00
	Email to defs re status of settlement documents									
01-09-2025	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.600	800.00	480.00
	Finalize settlement documents and send to JM clean execution copies of stipulation and exhibits; t.c. JM re same									
01-15-2025	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.100	800.00	80.00
	Review email correspondence re status of settlement docs									
01-16-2025	Approved		Billable	09 - Settlement/Mediation	Keller, Beth			0.100	800.00	80.00
	Email corr w/ JM re proposed prelim approval order									
<b>Professional Total</b>								<b>53.700</b>		<b>42,960.00</b>

***Lerner, Jonathan***

09-06-2022	Approved		Billable	05 - Motion	Lerner, Jonathan			4.000	525.00	2,100.00
	05 - Motion - review of Defendants' 12(c) motion, related research									
09-12-2022	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			4.000	525.00	2,100.00
	12 - Analyze and review - review of complaint									
09-13-2022	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			8.000	525.00	4,200.00
	12 - Analyze and review - review of complaint and related SEC filings									
09-19-2022	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			8.000	525.00	4,200.00
	12 - Analyze and review - review of MTD briefing, case file, company									
09-20-2022	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			7.000	525.00	3,675.00
	12 - Analyze and review - review of MTD briefing, case file, company									
09-21-2022	Approved		Billable	11 - Correspondence/Communications	Lerner, Jonathan			0.500	525.00	262.50
	11 - Correspondence/Communications - discussion with colleague									
09-23-2022	Approved		Billable	05 - Motion	Lerner, Jonathan			7.000	525.00	3,675.00

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
05 - Motion - review and edits to opp to 12(c) motion for judgment on the pleadings										
01-13-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			3.000	525.00	1,575.00
03 - Discovery - verifying whether search terms were correctly run (for Mike)										
01-13-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			1.000	525.00	525.00
11 - Correspondence/Communications - correspondence with colleagues										
01-17-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			6.000	525.00	3,150.00
03 - Discovery - preparing subpoenas and riders, correspondence with colleagues										
01-20-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			4.000	525.00	2,100.00
11 - Correspondence/Communications - correspondence with colleagues, attention to service of subpoenas										
01-24-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
03 - Discovery - attention to subpoena service										
01-25-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.000	525.00	525.00
03 - Discovery - correspondence with attorneys for defendants, saving served documents to file										
02-02-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			5.000	525.00	2,625.00
03 - Discovery - attention to correspondence from JPM attorney regarding subpoena, discussion with colleagues, call and prep for call with JPM attorney										
02-13-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
03 - Discovery - updating rogs, preparing RFP seeking shareholder list from defendants										
02-22-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
03 - Discovery - attention to subpoena correspondence and discussion with colleagues										
02-23-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
03 - Discovery - attention to subpoena correspondence and discussion with colleagues										
02-24-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
03 - Discovery - attention to subpoena correspondence and discussion with colleagues										
02-25-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
11 - Correspondence/Communications - email with Latham re call										
02-27-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			2.000	525.00	1,050.00
03 - Discovery - call and prep for call with Latham										
02-28-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			3.000	525.00	1,575.00
03 - Discovery - research re Hague convention subpoena process										
03-01-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			3.000	525.00	1,575.00
03 - Discovery - research re Hague convention subpoena process										

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><u>Lerner, Jonathan</u></b>										
03-06-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			7.000	525.00	3,675.00
				05 - Motion - drafting motion seeking issuance of hague request letter						
03-07-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			10.000	525.00	5,250.00
				05 - Motion - research, drafting motion seeking issuance of hague request letter						
03-08-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			8.000	525.00	4,200.00
				05 - Motion - preparing motion for letter of request						
03-09-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			7.000	525.00	3,675.00
				05 - Motion - preparing letters of request, finalizing motion						
03-10-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			7.000	525.00	3,675.00
				05 - Motion - revisions to letter of request, edits to declaration, translation comparisons for complaint, correspondence with colleagues						
03-13-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			7.000	525.00	3,675.00
				05 - Motion - letter of request motion finalization and filing, email to court						
03-14-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			0.800	525.00	420.00
				05 - Motion - attention to saving mtn docs						
03-25-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			1.000	525.00	525.00
				11 - Correspondence/Communications - discussion re potential shareholder survey, review of questionnaire						
03-27-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			2.000	525.00	1,050.00
				03 - Discovery - prep for call and call with Latham re production and motion for letters of request, subsequent emails and discussion with colleagues						
03-28-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			4.000	525.00	2,100.00
				05 - Motion - reply to response to motion for letter of request, preparation of amended letter of request						
03-28-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
				03 - Discovery - preparing survey for class and cover letter						
03-29-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.500	525.00	262.50
				11 - Correspondence/Communications - correspondence with colleagues						
03-30-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			3.500	525.00	1,837.50
				05 - Motion - drafting stip and proposed order re letter of request, discussion with colleagues, review of edits from colleagues						
03-30-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to Latham						
04-02-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to colleagues						

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
04-03-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to chambers						
04-03-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.500	525.00	262.50
				11 - Correspondence/Communications - emails with Latham, attention to emails with colleagues						
04-11-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			2.500	525.00	1,312.50
				05 - Motion - Submitting courtesy copy of stipulation exhibits and operative letter of request and attachment (translated complaint) to chambers						
04-17-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.000	525.00	525.00
				03 - Discovery - attention to mailing of letter of request to Tribunal cantonal Vaud						
04-18-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			1.500	525.00	787.50
				11 - Correspondence/Communications - emails to colleagues, email to Latham						
04-18-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			3.000	525.00	1,575.00
				03 - Discovery - survey finalization, discussion with colleagues						
04-20-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to Latham						
04-21-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to Davis Polk						
04-21-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			3.000	525.00	1,575.00
				03 - Discovery - review of Lazard R&Os to subpoena, discussion with colleagues						
04-24-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			3.000	525.00	1,575.00
				03 - Discovery - review of letter of request, follow up with Latham re Nestle response						
05-19-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - followup email to Davis Polk (Lazard)						
05-24-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to court reporter re transcript order						
05-25-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			3.000	525.00	1,575.00
				03 - Discovery - preparing deduplicated shareholder list for areas of California						
05-25-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			2.000	525.00	1,050.00
				05 - Motion - preparing proposed case schedule and stip						

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
05-26-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - attention to shareholder survey						
06-02-2023	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			2.000	525.00	1,050.00
				12 - Analyze and review - review of 2/24/23 hearing transcript						
06-04-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			1.000	525.00	525.00
				11 - Correspondence/Communications - emails, attention to emails						
06-08-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - review of discovery status, discussion with colleagues, followup email to Latham						
06-09-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.000	525.00	525.00
				03 - Discovery - attention to search terms						
06-19-2023	Approved		Billable	15 - Research	Lerner, Jonathan			7.000	525.00	3,675.00
				15 - Research - research re Palforzia treatment procedure, medical guidance literature review						
06-20-2023	Approved		Billable	15 - Research	Lerner, Jonathan			7.000	525.00	3,675.00
				15 - Research - research re Palforzia treatment procedure, medical guidance literature review						
06-21-2023	Approved		Billable	15 - Research	Lerner, Jonathan			5.000	525.00	2,625.00
				15 - Research - continued research re Palforzia treatment procedure, medical guidance literature review, email to colleagues summarizing pertinent information re dose escalation						
06-22-2023	Approved		Billable	15 - Research	Lerner, Jonathan			2.000	525.00	1,050.00
				15 - Research - review of treatment guideline for Palforzia						
06-22-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			0.500	525.00	262.50
				03 - Discovery - proposed survey edit						
07-05-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.000	525.00	525.00
				03 - Discovery - attention to forwarding production data to co-counsel						
09-29-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			1.000	525.00	525.00
				11 - Correspondence/Communications - discussion re case plan, edit to case plan doc						
10-03-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			7.000	525.00	3,675.00
				03 - Discovery - review of discovery						
10-04-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			6.000	525.00	3,150.00
				03 - Discovery - review of discovery						
10-05-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			6.000	525.00	3,150.00
				03 - Discovery - review of discovery						
10-06-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
10-09-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			7.000	525.00	3,675.00
				03 - Discovery - edits to RFAs and Rogs						
10-09-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			7.000	525.00	3,675.00
				03 - Discovery - review of discovery and timeline						
10-10-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery, edits to Rogs and RFAs						
10-11-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery						
10-13-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery						
10-16-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			8.000	525.00	4,200.00
				03 - Discovery - review of discovery						
10-17-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			8.000	525.00	4,200.00
				03 - Discovery - review of discovery						
10-18-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery						
10-19-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			8.000	525.00	4,200.00
				03 - Discovery - review of discovery						
10-20-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			8.000	525.00	4,200.00
				03 - Discovery - review of discovery						
10-23-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - review of discovery						
10-24-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - review of discovery						
10-25-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			6.000	525.00	3,150.00
				03 - Discovery - review of discovery						
10-26-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery						
10-27-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery						
11-01-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			12.000	525.00	6,300.00
				03 - Discovery - review of discovery productions						
11-02-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			12.000	525.00	6,300.00
				03 - Discovery - review of discovery productions						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
11-03-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			14.000	525.00	7,350.00
				03 - Discovery - review of discovery productions						
11-06-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			8.000	525.00	4,200.00
				03 - Discovery - preparing letter of request and proposed stipulation and order						
11-07-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - revisions and edits to letter of request; correspondence with counsel for defendants, discussions with colleagues						
11-08-2023	Approved		Billable	05 - Motion	Lerner, Jonathan			1.000	525.00	525.00
				05 - Motion - filing stipulation, correspondence with court						
11-09-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to court						
11-09-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			12.000	525.00	6,300.00
				03 - Discovery - review of discovery						
11-10-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			10.000	525.00	5,250.00
				03 - Discovery - review of discovery						
11-13-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - email to court						
11-13-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			8.000	525.00	4,200.00
				03 - Discovery - edits to timeline, correspondence with co-counsel						
11-27-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.500	525.00	262.50
				11 - Correspondence/Communications - emails with colleagues						
11-28-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.500	525.00	262.50
				11 - Correspondence/Communications - emails with colleagues						
11-29-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.500	525.00	262.50
				11 - Correspondence/Communications - emails with colleagues						
11-30-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			3.000	525.00	1,575.00
				11 - Correspondence/Communications - correspondence with Tribunal cantonal Vaud						
12-01-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			4.000	525.00	2,100.00
				11 - Correspondence/Communications - correspondence with Tribunal cantonal Vaud, emails with colleagues						

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
12-04-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			5.000	525.00	2,625.00
				11 - Correspondence/Communications - correspondence with Tribunal cantonal Vaud, emails with Latham, call to Kristin Murphy, discussion with colleagues, review of file and saving relevant docs						
12-05-2023	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			2.000	525.00	1,050.00
				11 - Correspondence/Communications - email with Swiss tribunal, discussion with colleagues						
12-06-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - correspondence with swiss court, preparing alternative letter of request and stip for Behar, review of FDA docs						
12-07-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - collection and reiew of FDA materials						
12-08-2023	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - collection and reiew of FDA materials						
12-18-2023	Approved		Billable	04 - Deposition	Lerner, Jonathan			3.000	525.00	1,575.00
				04 - Deposition - preparing deposition notices, correspondence with co-counsel, attention to case file organization						
12-19-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Lerner, Jonathan			0.500	525.00	262.50
				06 - Preparation Hearing/Trial - obtaining article						
01-10-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			4.000	525.00	2,100.00
				12 - Analyze and review - review of Oxtoby transcript						
01-11-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			4.000	525.00	2,100.00
				03 - Discovery - review of Dallas and Bjerkholt depo transcripts						
01-12-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
				03 - Discovery - review of Dallas depo transcript						
01-15-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
				03 - Discovery - review of Svitak transcript						
01-15-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			1.500	525.00	787.50
				03 - Discovery - preparing subpoena						
01-16-2024	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - discussion with colleague						
01-25-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			0.500	525.00	262.50
				12 - Analyze and review - review of corporate filings						
01-31-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			0.800	525.00	420.00
				03 - Discovery - review of Oxtoby transcript segment, review of corporate filings						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
02-06-2024	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.400	525.00	210.00
				11 - Correspondence/Communications - discussion with colleague						
02-08-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			7.000	525.00	3,675.00
				03 - Discovery - review of discovery, work on RFAs and Rogs						
02-09-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			7.000	525.00	3,675.00
				03 - Discovery - review of discovery, work on RFAs and Rogs						
02-19-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			2.000	525.00	1,050.00
				03 - Discovery - review of Svitak transcripts						
02-21-2024	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - discussion with colleague						
03-08-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			5.000	525.00	2,625.00
				05 - Motion - assistance with class cert motion finalization						
03-28-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			7.000	525.00	3,675.00
				03 - Discovery - review of depo transcripts, notes						
03-29-2024	Approved		Billable	03 - Discovery	Lerner, Jonathan			9.000	525.00	4,725.00
				03 - Discovery - review of depo transcripts, notes						
04-13-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			7.000	525.00	3,675.00
				12 - Analyze and review - review and analysis of Gompers Report						
04-15-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			1.000	525.00	525.00
				12 - Analyze and review - notes re Gompers Report						
04-17-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			3.000	525.00	1,575.00
				05 - Motion - preparing redacted notice of motion and motion for filing						
04-18-2024	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50
				11 - Correspondence/Communications - discussion with colleague						
05-21-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			0.800	525.00	420.00
				05 - Motion - review of class cert reply, discussion with colleagues						
05-23-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			2.500	525.00	1,312.50
				05 - Motion - preparing stip and proposed order certifying class						
06-12-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			5.000	525.00	2,625.00
				05 - Motion - attention to Daubert motion re Gompers						
06-13-2024	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.300	525.00	157.50

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Lerner, Jonathan</b>										
11 - Correspondence/Communications - attention to emails										
06-13-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			7.000	525.00	3,675.00
05 - Motion - attention to Daubert motion re Gompers										
06-14-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			12.000	525.00	6,300.00
05 - Motion - attention to MSJ, Daubert Mtn, admin mtns to seal, filing, emails from colleagues										
06-17-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			6.000	525.00	3,150.00
05 - Motion - attention to saving, compiling motion docs and sending working copies to court										
06-18-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			1.500	525.00	787.50
05 - Motion - attention to assembly of working copies, saving further docs										
08-02-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			2.000	525.00	1,050.00
05 - Motion - review of brief, nit edits										
08-05-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			12.000	525.00	6,300.00
05 - Motion - assistance with finalization of opp to defendants' MSJ and opp to daubert motion, assistance with filing										
09-06-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			1.500	525.00	787.50
05 - Motion - attention to file, saving docs										
09-13-2024	Approved		Billable	09 - Settlement/Mediation	Lerner, Jonathan			0.500	525.00	262.50
09 - Settlement/Mediation - discussion re mediation statement										
09-17-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			7.000	525.00	3,675.00
05 - Motion - review and edits to plaintiffs reply memorandum in further support of Daubert mtn re Gompers										
09-18-2024	Approved		Billable	09 - Settlement/Mediation	Lerner, Jonathan			0.500	525.00	262.50
09 - Settlement/Mediation - read and reviewed defs mediation statement										
09-18-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			8.000	525.00	4,200.00
05 - Motion - review and edits to reply mem in further support of Daubert motion										
09-19-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			10.000	525.00	5,250.00
05 - Motion - review and edits to plaintiffs reply memorandum in further support of Daubert mtn re Gompers, review and edits to Monteverde declaration										
09-30-2024	Approved		Billable	15 - Research	Lerner, Jonathan			5.000	525.00	2,625.00
15 - Research - research and review of potential precedent / useful jury instructions and voir dire questions										
10-01-2024	Approved		Billable	08 - Trial	Lerner, Jonathan			7.000	525.00	3,675.00
08 - Trial - drafting jury instructions										
10-02-2024	Approved		Billable	08 - Trial	Lerner, Jonathan			7.000	525.00	3,675.00
08 - Trial - drafting voir dire questions										
10-02-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			0.800	525.00	420.00
12 - Analyze and review - correspondence re file organization and unredacted filing by defendants										

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><u>Lerner, Jonathan</u></b>										
10-02-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			1.500	525.00	787.50
				12 - Analyze and review - attention to PPT drafts						
10-03-2024	Approved		Billable	08 - Trial	Lerner, Jonathan			7.000	525.00	3,675.00
				08 - Trial - edits and discussion re preliminary jury instructions, edits and discussion re voir dire questions						
10-04-2024	Approved		Billable	08 - Trial	Lerner, Jonathan			2.500	525.00	1,312.50
				08 - Trial - edits and discussion re preliminary jury instructions, edits and discussion re voir dire questions						
10-07-2024	Approved		Billable	08 - Trial	Lerner, Jonathan			4.000	525.00	2,100.00
				08 - Trial - edits to preliminary jury instructions						
10-08-2024	Approved		Billable	08 - Trial	Lerner, Jonathan			4.000	525.00	2,100.00
				08 - Trial - edits to preliminary jury instructions						
10-09-2024	Approved		Billable	08 - Trial	Lerner, Jonathan			5.000	525.00	2,625.00
				08 - Trial - edits to voir dire questions, research re potential voir dire question						
10-09-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			0.500	525.00	262.50
				12 - Analyze and review - review of paper surveys and survey scans						
10-19-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			0.500	525.00	262.50
				05 - Motion - review of powerpoint						
10-24-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			0.800	525.00	420.00
				12 - Analyze and review - review of Oxtoby outline segment						
10-25-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			3.000	525.00	1,575.00
				05 - Motion - attention to trial arguments outline, correspondence with colleagues						
10-27-2024	Approved		Billable	11 - Correspondence/ Communications	Lerner, Jonathan			0.500	525.00	262.50
				11 - Correspondence/Communications - attention to emails						
10-30-2024	Approved		Billable	12 - Analyze and review	Lerner, Jonathan			3.000	525.00	1,575.00
				12 - Analyze and review - attention to arguments outline and talking points						
10-30-2024	Approved		Billable	09 - Settlement/Mediation	Lerner, Jonathan			1.000	525.00	525.00
				09 - Settlement/Mediation - review of mediator recommendation						
12-20-2024	Approved		Billable	05 - Motion	Lerner, Jonathan			5.000	525.00	2,625.00
				05 - Motion - prelim approval motion edits, finalization, formatting						
01-03-2025	Approved		Billable	09 - Settlement/Mediation	Lerner, Jonathan			6.000	525.00	3,150.00
				09 - Settlement/Mediation - finalization edits to prelim approval memo						
<b>Professional Total</b>								<b>664.600</b>		<b>348,915.00</b>

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
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 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
09-15-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Monteverde, Juan			0.500	1,025.00	512.50
				01 - Case Development, Investigation and review corporate filings - new matter and assign preliminary review to John and Jordan						
09-21-2020	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.800	1,025.00	820.00
				11 - Correspondence/Communications - cnfer w new client Germano re case and retainer						
09-22-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Monteverde, Juan			6.200	1,025.00	6,355.00
				01 - Case Development, Investigation and review corporate filings, 14d9						
09-23-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Monteverde, Juan			4.000	1,025.00	4,100.00
				01 - Case Development, Investigation and review corporate filings, 14d9						
09-24-2020	Approved		Billable	02 - Pleading	Monteverde, Juan			4.500	1,025.00	4,612.50
				02 - Pleading - draft/edit complaint						
09-25-2020	Approved		Billable	02 - Pleading	Monteverde, Juan			1.500	1,025.00	1,537.50
				02 - Pleading - Finalize/file complaint						
10-01-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Monteverde, Juan			2.600	1,025.00	2,665.00
				01 - Case Development, Investigation and review corporate filings, amendments to 14d-9 and effect in case at large						
10-15-2020	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.000	1,025.00	1,025.00
				12 - Analyze and review - tender closing and psdra notice						
10-23-2020	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
				14 - Meeting/Strategy - w Jordan re next steps and amended complaint for damages re projections						
12-08-2020	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - new clients Svitak and retainer/next steps in cases						
12-11-2020	Approved		Billable	05 - Motion	Monteverde, Juan			1.200	1,025.00	1,230.00
				05 - Motion - review LP						
12-12-2020	Approved		Billable	05 - Motion	Monteverde, Juan			1.100	1,025.00	1,127.50
				05 - Motion - draft psdra certs for svitaks and send via docusign, discuss same w clients and obtain signatures						
12-14-2020	Approved		Billable	05 - Motion	Monteverde, Juan			4.800	1,025.00	4,920.00
				05 - Motion - review LP brief and discuss/confirm w Mike P at KSF alliance						

**Time Entries****Monteverde & Associates PC**

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 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
12-28-2020	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			2.000	1,025.00	2,050.00
				14 - Meeting/Strategy - discuss re notice LP brief and chat w Miles re research and judge change issue re other cases						
02-09-2021	Approved		Billable	02 - Pleading	Monteverde, Juan			5.000	1,025.00	5,125.00
				02 - Pleading - review/edit amended complaint, discuss w Jordan direction of case and edits						
02-20-2021	Approved		Billable	06 - Preparation Hearing/Trial	Monteverde, Juan			2.000	1,025.00	2,050.00
				06 - Preparation Hearing/Trial - LP hearing 2/26						
02-22-2021	Approved		Billable	05 - Motion	Monteverde, Juan			1.500	1,025.00	1,537.50
				05 - Motion - review LP order, confer w KSF, and inform/discuss w Bruce						
03-11-2021	Approved		Billable	05 - Motion	Monteverde, Juan			2.000	1,025.00	2,050.00
				05 - Motion - stay pending DE 220 and stip re same, confer w LW and Mike P re same						
03-15-2021	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - finalize/file stip to stay pending 220						
08-04-2021	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			2.600	1,025.00	2,665.00
				14 - Meeting/Strategy - Mike P re 220						
09-16-2021	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - lift stay re 220 and propose briefing schedule						
09-27-2021	Approved		Billable	02 - Pleading	Monteverde, Juan			6.000	1,025.00	6,150.00
				02 - Pleading - review 14d9 and amendments, edit draft amended complaint						
09-30-2021	Approved		Billable	02 - Pleading	Monteverde, Juan			3.000	1,025.00	3,075.00
				02 - Pleading - review/edit/finalize amended complaint						
11-29-2021	Approved		Billable	05 - Motion	Monteverde, Juan			2.800	1,025.00	2,870.00
				05 - Motion - review defs mtd, confer w team						
12-01-2021	Approved		Billable	05 - Motion	Monteverde, Juan			6.000	1,025.00	6,150.00
				05 - Motion - further in depth review of defs mtd and identify/research safe harbor defense error						
01-07-2022	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			4.000	1,025.00	4,100.00
				14 - Meeting/Strategy - team and Mike P re mtd and safe harbor						
01-11-2022	Approved		Billable	05 - Motion	Monteverde, Juan			12.000	1,025.00	12,300.00
				05 - Motion - review/edit/draft/finalize opp to MTD						
02-16-2022	Approved		Billable	05 - Motion	Monteverde, Juan			5.500	1,025.00	5,637.50
				05 - Motion - review def reply to MTD and new arguments, confer w re sur reply						
02-22-2022	Approved		Billable	05 - Motion	Monteverde, Juan			2.000	1,025.00	2,050.00
				05 - Motion - review/edit/finalize objection to new argument and sur reply request						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
04-24-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			8.000	1,025.00	8,200.00
				06 - Preparation Hearing/Trial - mtd						
04-25-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			4.800	1,025.00	4,920.00
				06 - Preparation Hearing/Trial - mtd and chat w miles and mike p.						
04-26-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			5.000	1,025.00	5,125.00
				06 - Preparation Hearing/Trial - MTD and ppt						
04-28-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			4.500	1,025.00	4,612.50
				06 - Preparation Hearing/Trial - mtd						
04-29-2022	Approved		Billable	07 - Court Hearing	Monteverde, Juan			2.000	1,025.00	2,050.00
				07 - Court Hearing - prep and conduct mtd hearing						
05-06-2022	Approved		Billable	02 - Pleading	Monteverde, Juan			0.600	1,025.00	615.00
				02 - Pleading - discuss and review stip to extend def answer time						
05-11-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			1.600	1,025.00	1,640.00
				17 - Case Schedule/CMC/Reports - draft 26F and disucss w team and KSF						
05-12-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			2.500	1,025.00	2,562.50
				17 - Case Schedule/CMC/Reports - multiple calls/emails and review drafts re 26f						
05-23-2022	Approved		Billable	02 - Pleading	Monteverde, Juan			4.600	1,025.00	4,715.00
				02 - Pleading - review defs answer						
05-25-2022	Approved		Billable	02 - Pleading	Monteverde, Juan			6.000	1,025.00	6,150.00
				02 - Pleading - reveiw/annotate answer from defs						
06-04-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			3.000	1,025.00	3,075.00
				17 - Case Schedule/CMC/Reports - review edits to 26f and disucss w team and ksf, multiple emails						
06-06-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			1.200	1,025.00	1,230.00
				17 - Case Schedule/CMC/Reports - review further etdits to 26f						
06-06-2022	Approved		Billable	12 - Analyze and review	Monteverde, Juan			4.000	1,025.00	4,100.00
				12 - Analyze and review - case law re standing and private right of action re defs anticipated 12c						
06-08-2022	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			2.000	1,025.00	2,050.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
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 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
17 - Case Schedule/CMC/Reports - further edits from defs to 26f and cmc, multiple emails re same										
06-09-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			4.800	1,025.00	4,920.00
03 - Discovery - review defs 26 disclosures and research witnesses identified										
06-10-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
03 - Discovery - review/edit 26 disclosures for plaintiffs										
06-16-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			2.600	1,025.00	2,665.00
06 - Preparation Hearing/Trial - re cmc and discovery plan and 12c issues re private right of action										
06-17-2022	Approved		Billable	07 - Court Hearing	Monteverde, Juan			1.000	1,025.00	1,025.00
07 - Court Hearing - CMC re discovery plan										
07-01-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			4.000	1,025.00	4,100.00
03 - Discovery - attention RFP and chat w Jon re same										
09-21-2022	Approved		Billable	05 - Motion	Monteverde, Juan			8.000	1,025.00	8,200.00
05 - Motion - opp 12c re private right of action										
09-23-2022	Approved		Billable	15 - Research	Monteverde, Juan			7.800	1,025.00	7,995.00
15 - Research - cases cited in emulex re 12c opp										
09-27-2022	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
05 - Motion - Review notes and meet w team re 12c strategy										
10-06-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			7.000	1,025.00	7,175.00
03 - Discovery - review core docs										
10-07-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			5.000	1,025.00	5,125.00
03 - Discovery - core docs review										
10-08-2022	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - review core docs notes and email defs re ESI and open discovery issues										
10-10-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			4.800	1,025.00	4,920.00
03 - Discovery - ESI and terms										
10-12-2022	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - emails w defs re custodial info re esi										
11-01-2022	Approved		Billable	05 - Motion	Monteverde, Juan			7.000	1,025.00	7,175.00
05 - Motion - review/annotate reply to 12c										
11-04-2022	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.300	1,025.00	307.50
11 - Correspondence/Communications - ESI emails										

**Time Entries****Monteverde & Associates PC**

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
11-05-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			8.000	1,025.00	8,200.00
				06 - Preparation Hearing/Trial - 12c re private right of action						
11-10-2022	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - status re ESI (various emails)						
11-12-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			7.000	1,025.00	7,175.00
				06 - Preparation Hearing/Trial - draft hearing outline for 12c						
11-17-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			7.000	1,025.00	7,175.00
				06 - Preparation Hearing/Trial - 12c and review cases/outline						
11-18-2022	Approved		Billable	07 - Court Hearing	Monteverde, Juan			3.000	1,025.00	3,075.00
				07 - Court Hearing - finla prep and 12c argument						
11-23-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			4.000	1,025.00	4,100.00
				03 - Discovery - review/edit pltf's responses to RFP						
12-12-2022	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - various emails re ESI and hit reports						
12-13-2022	Approved		Billable	15 - Research	Monteverde, Juan			2.500	1,025.00	2,562.50
				15 - Research - expert drafts and protections						
12-13-2022	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - experts disclosures						
12-20-2022	Approved		Billable	03 - Discovery	Monteverde, Juan			5.000	1,025.00	5,125.00
				03 - Discovery - review search terms and edits and counter						
12-23-2022	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - Attention to 1292 briefing stip and emails re same						
12-23-2022	Approved		Billable	05 - Motion	Monteverde, Juan			2.800	1,025.00	2,870.00
				05 - Motion - Review defs 1292 brief re 11/18/22 ruling						
12-29-2022	Approved		Billable	05 - Motion	Monteverde, Juan			3.500	1,025.00	3,587.50
				05 - Motion - Attention to 1292 brief						
01-05-2023	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - 1292 hearing and stip to adjourn it. emails re same						
01-12-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			3.700	1,025.00	3,792.50

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 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
03 - Discovery - review hit report, confer internally and w KSF re same										
01-17-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
03 - Discovery - review/edit subpoenas to bankers										
01-22-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.700	1,025.00	717.50
11 - Correspondence/Communications - esi and search terms										
01-24-2023	Approved		Billable	05 - Motion	Monteverde, Juan			8.000	1,025.00	8,200.00
05 - Motion - attention to 1292 opp										
02-04-2023	Approved		Billable	05 - Motion	Monteverde, Juan			6.000	1,025.00	6,150.00
05 - Motion - review 1292 reply										
02-08-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			7.000	1,025.00	7,175.00
03 - Discovery - review/collect Svitak's docs for rfp responses										
02-11-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			3.500	1,025.00	3,587.50
03 - Discovery - review/reorganize svitak production, produce same to defs										
02-14-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.500	1,025.00	1,537.50
03 - Discovery - review responses and audit production of Svitak										
02-17-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.000	1,025.00	2,050.00
03 - Discovery - review docs and supplemental prod for svitak										
02-18-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			8.000	1,025.00	8,200.00
06 - Preparation Hearing/Trial - 1292										
02-19-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			6.200	1,025.00	6,355.00
06 - Preparation Hearing/Trial - outline re 1292										
02-22-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			2.200	1,025.00	2,255.00
11 - Correspondence/Communications - various emails and meet and confer schedules										
02-22-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
03 - Discovery - nestle objections to subpoena										
02-23-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			5.000	1,025.00	5,125.00
06 - Preparation Hearing/Trial - 1292										
02-24-2023	Approved		Billable	07 - Court Hearing	Monteverde, Juan			1.500	1,025.00	1,537.50
07 - Court Hearing - 1292										
03-08-2023	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
05 - Motion - attention to rogatory letter re nestle										
03-10-2023	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
14 - Meeting/Strategy - re nestle and translator										
03-31-2023	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.500	1,025.00	1,537.50
14 - Meeting/Strategy - re mediation and potential mediators										
03-31-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.300	1,025.00	307.50
11 - Correspondence/Communications - emails w defs re mediation and using Phillips ADR										
04-01-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.600	1,025.00	2,665.00
03 - Discovery - review new production AIMMUNE-0113887-AIMMUNE-0202115 and prep index and file to load in Cloud9 obtain credentials for team.										
04-10-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - emails re mediation and call w Matt R re same										
04-13-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - various emails re mediation and options w PADRE										
04-13-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			8.000	1,025.00	8,200.00
03 - Discovery - review production AIMMUNE-0000487-AIMMUNE-0113886										
04-14-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			8.000	1,025.00	8,200.00
03 - Discovery - review production AIMMUNE-0000487-AIMMUNE-0113886										
04-15-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			7.000	1,025.00	7,175.00
03 - Discovery - review production AIMMUNE-0000487-AIMMUNE-0113886										
04-17-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			4.800	1,025.00	4,920.00
03 - Discovery - search for specific terms in production AIMMUNE-0000487-AIMMUNE-0113886										
04-18-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			6.000	1,025.00	6,150.00
03 - Discovery - review new production and prep load and index for AIMMUNE-0202116-AIMMUNE-0225266.										
04-18-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.700	1,025.00	717.50
11 - Correspondence/Communications - emails and calls w Ditchfield re bankers production										
04-20-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.200	1,025.00	205.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
11 - Correspondence/Communications - email w Ditchfield										
04-21-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.600	1,025.00	615.00
11 - Correspondence/Communications - call w Ditchfield re status of bankers and chat w Mike P re same and next steps										
04-25-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - confer w Mike P and emails defs re plfts privilege log										
04-26-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			5.000	1,025.00	5,125.00
03 - Discovery - review/edit class survey										
04-29-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			3.000	1,025.00	3,075.00
03 - Discovery - review defs privilege log										
05-05-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.500	1,025.00	2,562.50
03 - Discovery - review new production AIMMUNE-0225267-AIMMUNE-0242044 and prep file and index for cloud9 load.										
05-08-2023	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
14 - Meeting/Strategy - mediation plan										
05-08-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.300	1,025.00	307.50
11 - Correspondence/Communications - emails w defs re mediation										
05-13-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.000	1,025.00	2,050.00
03 - Discovery - received/review/prep new load AIMMUNE- 0242045-AIMMUNE-0242185.										
05-18-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.200	1,025.00	205.00
11 - Correspondence/Communications - follow up w Ditchfield re bankers prod										
05-22-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.300	1,025.00	307.50
11 - Correspondence/Communications - memails w Ditchfield re bankers and JPM prod										
05-23-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - emails re call to discuss strategy										
05-24-2023	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
14 - Meeting/Strategy - case/discovery/evidence										
05-25-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			1.200	1,025.00	1,230.00
17 - Case Schedule/CMC/Reports - attention to revised schedule										

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
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 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
05-26-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.200	1,025.00	2,255.00
				03 - Discovery - survey and mailing lists						
05-27-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			1.000	1,025.00	1,025.00
				17 - Case Schedule/CMC/Reports - revise schedule						
05-28-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			0.300	1,025.00	307.50
				17 - Case Schedule/CMC/Reports - finalize and provide draft to defs						
05-28-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
				03 - Discovery - collect and prep JPM production for defs						
05-31-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - attention to revise schedule and emails w defs re same and counter dates						
05-31-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - emails w ditchfield re lazard						
06-02-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.900	1,025.00	922.50
				11 - Correspondence/Communications - emails re bofa and ordution status						
06-06-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - extension fro rogs and rfa						
06-06-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			1.000	1,025.00	1,025.00
				17 - Case Schedule/CMC/Reports - attention to further revised schedule						
06-08-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			7.000	1,025.00	7,175.00
				03 - Discovery - review deal files jpm and lazard and pull working lists						
06-08-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.500	1,025.00	2,562.50
				03 - Discovery - draft search terms for bankers						
06-09-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
				03 - Discovery - attention to edits re banker search terms						
06-09-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.400	1,025.00	1,435.00
				11 - Correspondence/Communications - numerous emails re bankers and ESI w defs						
06-09-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
11 - Correspondence/Communications - emails re revised schedule										
06-12-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - emails re revised schedule and signatures										
06-13-2023	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			0.500	1,025.00	512.50
17 - Case Schedule/CMC/Reports - finalize and file revised schedule										
06-14-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - emails w Ditchfield re jpm and lazard and Stewart re BofA										
06-15-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - calls and emails w Ditchfield re JPM and Lazard prod										
06-16-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.000	1,025.00	2,050.00
03 - Discovery - review/revise search terms for BofA										
06-16-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - emails re bofA search terms										
06-16-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - videoconference w bofa re search terms										
06-21-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			6.000	1,025.00	6,150.00
12 - Analyze and review - Palforzia studies and emails w team and Mike P										
06-22-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			7.000	1,025.00	7,175.00
03 - Discovery - survey and webmaster buildup, emails to/from webmaster										
06-22-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - call w Morgan re status conference 6/23										
06-23-2023	Approved		Billable	07 - Court Hearing	Monteverde, Juan			1.000	1,025.00	1,025.00
07 - Court Hearing - prep and attend status conf.										
06-23-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
03 - Discovery - update survey and trial date, web test										
06-23-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.300	1,025.00	307.50
11 - Correspondence/Communications - email to defs re survey and notice is live										



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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
06-26-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.200	1,025.00	205.00
				11 - Correspondence/Communications - email w Ditchfield						
06-26-2023	Approved		Billable	13 - Experts	Monteverde, Juan			1.500	1,025.00	1,537.50
				13 - Experts - call, engagement, and NDA						
06-30-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			3.200	1,025.00	3,280.00
				03 - Discovery - received and review core docs from BofA BOAS_AIMMUNE00000001 - BOAS_AIMMUNE00000577						
06-30-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.200	1,025.00	205.00
				11 - Correspondence/Communications - provide defs w BOAS_AIMMUNE00000001 - BOAS_AIMMUNE00000577,						
07-05-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
				03 - Discovery - review/organize Nestle prod						
07-14-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.000	1,025.00	2,050.00
				12 - Analyze and review - survey responses						
07-23-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.600	1,025.00	615.00
				11 - Correspondence/Communications - emails to bankers re custodians and terms						
07-25-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.300	1,025.00	307.50
				11 - Correspondence/Communications -bankers						
08-05-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.800	1,025.00	1,845.00
				12 - Analyze and review - survey and excel sheet w results analysis						
08-10-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.000	1,025.00	1,025.00
				12 - Analyze and review - survey responses						
08-20-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - bankers re status from all						
08-24-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.000	1,025.00	2,050.00
				12 - Analyze and review - hit report from BofA and counter re search terms						
09-05-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.400	1,025.00	1,435.00
				11 - Correspondence/Communications - ditchfield re status and update terms w BofA						
09-08-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - various emails w Ditchfield and team re status						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
09-11-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.500	1,025.00	1,537.50
				03 - Discovery - receive/review/prep load re Lazard						
09-14-2023	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
				14 - Meeting/Strategy - banker prod and review analysis						
09-14-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.200	1,025.00	1,230.00
				12 - Analyze and review - timeline re Lazard						
09-14-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.300	1,025.00	307.50
				11 - Correspondence/Communications - porivde defs w Lazard docs						
09-19-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - depo emails						
09-24-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - Lazard emails and inquiry re texts						
09-25-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - depo schedule						
09-27-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.400	1,025.00	1,435.00
				11 - Correspondence/Communications - emails various re status and production review						
09-28-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.000	1,025.00	2,050.00
				12 - Analyze and review - depo schedule and chat w Mike P re sequence						
09-29-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.200	1,025.00	1,230.00
				12 - Analyze and review - case plan						
10-11-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			4.000	1,025.00	4,100.00
				03 - Discovery - review/edit pltf responses to rogs and rfp						
10-12-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - exh organization						
10-13-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails and calls w Ditchfield re depositions/timing						
10-17-2023	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.600	1,025.00	615.00
				11 - Correspondence/Communications - depo schedule emails						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
10-18-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - emails re depo schedule						
10-19-2023	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			0.600	1,025.00	615.00
				17 - Case Schedule/CMC/Reports - revised schedule						
10-19-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			0.500	1,025.00	512.50
				03 - Discovery - varioius notices for defs adn directors						
10-21-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.500	1,025.00	2,562.50
				03 - Discovery - review new porduction from JPM, organize and load						
10-26-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - depo schedule and calendar						
10-28-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			2.000	1,025.00	2,050.00
				03 - Discovery - gather 3rd party prods and proivde ot dfs						
10-29-2023	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			0.400	1,025.00	410.00
				14 - Meeting/Strategy - Mike P re texts and defs outreach						
10-31-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - banker depots						
11-03-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.500	1,025.00	1,537.50
				11 - Correspondence/Communications - disocvery issues and depo prep						
11-07-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails re authentication and requirements						
11-08-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			4.500	1,025.00	4,612.50
				03 - Discovery - prep client depo outline						
11-09-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.300	1,025.00	307.50
				11 - Correspondence/Communications - client outline						
11-10-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.200	1,025.00	1,230.00
				11 - Correspondence/Communications - emails and gathering exs for court reporter						
11-13-2023	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.200	1,025.00	1,230.00
				12 - Analyze and review - R&O 2nd rfp						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
11-13-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			6.000	1,025.00	6,150.00
				03 - Discovery - review hot docs and potential depo exs						
11-14-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			8.000	1,025.00	8,200.00
				03 - Discovery - review hot docs and potential depo exs						
11-15-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			5.200	1,025.00	5,330.00
				03 - Discovery - review hot docs and potential depo exs						
11-15-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.800	1,025.00	820.00
				11 - Correspondence/Communications - depos and exs and reporter						
11-17-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - depo exs issues and court reporter suggestions						
11-17-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			5.000	1,025.00	5,125.00
				04 - Deposition - prep and attend Enright depo						
11-20-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.200	1,025.00	1,230.00
				11 - Correspondence/Communications - depo emails						
11-21-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails w BofA re depo and veritest re exs issues						
11-24-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - depo emails						
11-27-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications -, emails w Ditchfield re banker depos						
11-27-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			3.000	1,025.00	3,075.00
				04 - Deposition - prep McDade depo						
11-27-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			3.000	1,025.00	3,075.00
				04 - Deposition - prep outline and potential questions for bruce and barbara svitak depos						
11-28-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			4.000	1,025.00	4,100.00
				04 - Deposition - prep and conduct McDade depo						
11-28-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails re depo logistics						

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
11-29-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.200	1,025.00	1,230.00
11 - Correspondence/Communications - calls and emails w defs re class cert reps and depositions										
12-04-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - emails re depositions and exs w excel sheets										
12-05-2023	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			1.500	1,025.00	1,537.50
17 - Case Schedule/CMC/Reports - discuss and review proposed revised schedule - discuss same w team and Mike p										
12-06-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			4.500	1,025.00	4,612.50
04 - Deposition - prep both Barbara and Bruce depo										
12-07-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			4.000	1,025.00	4,100.00
04 - Deposition - prep and defend Bruce Svitak depo										
12-07-2023	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			0.500	1,025.00	512.50
17 - Case Schedule/CMC/Reports - fianlzie and file revised schedule										
12-08-2023	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			0.200	1,025.00	205.00
17 - Case Schedule/CMC/Reportsv - revised schedule order										
12-08-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			2.000	1,025.00	2,050.00
04 - Deposition - pep and defend Barbara Svitak depo										
12-11-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			8.000	1,025.00	8,200.00
04 - Deposition - travel to SFO and prep Bjerkholt and Dallas depo										
12-12-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			8.000	1,025.00	8,200.00
04 - Deposition - prep and conduct Dr. Dallas depo										
12-13-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			2.000	1,025.00	2,050.00
04 - Deposition - prep Bjerkholt depo and confer w Mike P										
12-13-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.600	1,025.00	615.00
11 - Correspondence/Communications - depo outlines										
12-14-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			12.000	1,025.00	12,300.00
04 - Deposition - Bjerkholt depo attendance and travel back to JFK										
12-16-2023	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
14 - Meeting/Strategy - confer w Mike p re texts from defs and discussions w defs										

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
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 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
12-18-2023	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - boaf re witness and schedule						
12-19-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			8.000	1,025.00	8,200.00
				04 - Deposition - prep, review outline, conduct Hendrix deposition						
12-20-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			7.000	1,025.00	7,175.00
				04 - Deposition - prep Behar depo						
12-21-2023	Approved		Billable	04 - Deposition	Monteverde, Juan			5.000	1,025.00	5,125.00
				04 - Deposition - prep and conduct Behar depo						
12-29-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
				03 - Discovery - receive and organize and load AIMMUNE-0246148-AIMMUNE-0246805						
12-30-2023	Approved		Billable	03 - Discovery	Monteverde, Juan			1.500	1,025.00	1,537.50
				03 - Discovery - review addl production						
01-03-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			8.000	1,025.00	8,200.00
				04 - Deposition - review and organize exs for upcoming depositions						
01-10-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			2.500	1,025.00	2,562.50
				04 - Deposition - prep Falberg deposition						
01-11-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			2.600	1,025.00	2,665.00
				04 - Deposition - review outline and confer w Mike P re Dr Adelamn depo						
01-11-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			3.000	1,025.00	3,075.00
				04 - Deposition - prep and conduct Ms. Falberg depo						
01-11-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.200	1,025.00	205.00
				11 - Correspondence/Communications - email re Falberg confi designation						
01-12-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			4.000	1,025.00	4,100.00
				04 - Deposition - attend depo for Dr. Adelman						
01-13-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			5.000	1,025.00	5,125.00
				12 - Analyze and review - review/annotate Oxtoby transcript						
01-14-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - emails w veritext re depo schedule						
01-14-2024	Approved		Billable	13 - Experts	Monteverde, Juan			8.000	1,025.00	8,200.00
				13 - Experts - Gather core docs for expert, organize and provide						
01-15-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			3.400	1,025.00	3,485.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
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 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
12 - Analyze and review - review/annotate Behar depo transcript										
01-15-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.000	1,025.00	2,050.00
12 - Analyze and review - review/annotate Hendrix transcript										
01-16-2024	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
14 - Meeting/Strategy - depo schedule and split w Mike P										
01-17-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - emails re addl depositions										
01-18-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - various emails and calls re depo schedule and court reports										
01-19-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			0.400	1,025.00	410.00
03 - Discovery - bofa depo notice										
01-20-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.300	1,025.00	307.50
11 - Correspondence/Communications - follow up re addl depositions										
01-20-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			0.800	1,025.00	820.00
03 - Discovery - depo notices for bankers										
01-20-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			8.000	1,025.00	8,200.00
03 - Discovery - review JPM decks in prep for depo										
01-21-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			8.000	1,025.00	8,200.00
03 - Discovery - review bofa decks										
01-22-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			7.000	1,025.00	7,175.00
04 - Deposition - prep BofA depo										
01-23-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			3.000	1,025.00	3,075.00
04 - Deposition - conduct Akawat depo (bofa)										
01-23-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			3.500	1,025.00	3,587.50
04 - Deposition - prep and review Greenblatt outline and discuss w Mike P										
01-23-2024	Approved		Billable	13 - Experts	Monteverde, Juan			6.500	1,025.00	6,662.50
13 - Experts - Additional docs requested by Jeffers										
01-24-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			4.000	1,025.00	4,100.00
04 - Deposition - prep and attend Greenblatt depo										
01-24-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			2.500	1,025.00	2,562.50
04 - Deposition - prep JPM depo										
01-25-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			6.500	1,025.00	6,662.50

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
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 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
04 - Deposition - prep and conduct Thiesen depo -JPM										
01-28-2024	Approved		Billable	13 - Experts	Monteverde, Juan			7.000	1,025.00	7,175.00
13 - Experts - review/annotate draft report										
01-30-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			8.000	1,025.00	8,200.00
03 - Discovery - review Lazard's books and decks										
01-30-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.800	1,025.00	1,845.00
12 - Analyze and review - review/annotate Falberg deposition transcript										
01-31-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			7.600	1,025.00	7,790.00
04 - Deposition - prep kingston depo and review books from Lazard										
02-01-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			3.000	1,025.00	3,075.00
12 - Analyze and review - review/annotate Bjerkholt depo transcript										
02-01-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			6.000	1,025.00	6,150.00
04 - Deposition - prep and conduct Kingston depo										
02-02-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.700	1,025.00	2,767.50
12 - Analyze and review - review/annotate McDade depo transcript										
02-02-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			3.000	1,025.00	3,075.00
12 - Analyze and review - review/annotate Enright depo tr										
02-03-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			4.000	1,025.00	4,100.00
12 - Analyze and review - seltzer depo tr										
02-03-2024	Approved		Billable	13 - Experts	Monteverde, Juan			6.000	1,025.00	6,150.00
13 - Experts - gather and highlight excerpts from depositions for expert										
02-05-2024	Approved		Billable	13 - Experts	Monteverde, Juan			5.700	1,025.00	5,842.50
13 - Experts - edits and suggestions for expert report										
02-06-2024	Approved		Billable	13 - Experts	Monteverde, Juan			3.800	1,025.00	3,895.00
13 - Experts - analyze expert damages model and suggestions re pricing										
02-07-2024	Approved		Billable	13 - Experts	Monteverde, Juan			4.000	1,025.00	4,100.00
13 - Experts - prep and call w jeffers										
02-08-2024	Approved		Billable	13 - Experts	Monteverde, Juan			3.500	1,025.00	3,587.50
13 - Experts - review schedules, prep and call w jeffers and neuzil										
02-09-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
03 - Discovery - finalize and serve rogs and rfas										
02-14-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			8.000	1,025.00	8,200.00
12 - Analyze and review - banker depo transcripts jpm, lazard and bofa										
02-15-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			3.000	1,025.00	3,075.00



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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
04 - Deposition - review/annotate depo transcript for Dr. Adelman										
02-15-2024	Approved		Billable	13 - Experts	Monteverde, Juan			4.000	1,025.00	4,100.00
13 - Experts - review surveys and excel w results, provide same to jeffers										
02-16-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			2.000	1,025.00	2,050.00
04 - Deposition - review/annotate Greenblatt depo transcript										
02-17-2024	Approved		Billable	13 - Experts	Monteverde, Juan			8.000	1,025.00	8,200.00
13 - Experts - review.edits to report										
02-18-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
03 - Discovery - survey responses										
02-20-2024	Approved		Billable	13 - Experts	Monteverde, Juan			3.500	1,025.00	3,587.50
13 - Expertsv - report revisions										
02-21-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			1.500	1,025.00	1,537.50
03 - Discovery - review survey responses and updated results tally										
02-22-2024	Approved		Billable	13 - Experts	Monteverde, Juan			4.200	1,025.00	4,305.00
13 - Experts - report and revisions										
02-23-2024	Approved		Billable	13 - Experts	Monteverde, Juan			2.500	1,025.00	2,562.50
13 - Experts - report and finalize and exchange w defs										
02-24-2024	Approved		Billable	13 - Experts	Monteverde, Juan			5.000	1,025.00	5,125.00
13 - Experts - review/annotate gompers defs report										
02-28-2024	Approved		Billable	13 - Experts	Monteverde, Juan			1.200	1,025.00	1,230.00
13 - Experts - expert back up from capitalIQ to provide same to defs										
02-29-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - email re depo erratas and class cert issues										
03-01-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - call and emails re rfa responses and timing										
03-01-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.000	1,025.00	2,050.00
12 - Analyze and review - defs d&o policies										
03-03-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - emails re timing for rfa responses from pltf										
03-04-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			3.000	1,025.00	3,075.00
03 - Discovery - survey responses and excel result tally update										



**Time Entries****Monteverde & Associates PC**

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
03-05-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications emails re class cert and daubert schedule						
03-06-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			2.500	1,025.00	2,562.50
				03 - Discovery - review supplemental production from defs re 3 rfp						
03-06-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.000	1,025.00	1,025.00
				12 - Analyze and review - defs r/o to 3rd rfp						
03-07-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
				03 - Discovery - review cloudnine storage options for databases and trial reactivation						
03-07-2024	Approved		Billable	05 - Motion	Monteverde, Juan			4.000	1,025.00	4,100.00
				05 - Motion - review/edit class cert br						
03-08-2024	Approved		Billable	05 - Motion	Monteverde, Juan			6.000	1,025.00	6,150.00
				05 - Motion - finalize/file class cert brief						
03-10-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			2.800	1,025.00	2,870.00
				09 - Settlement/Mediation - draft and send settlement offer						
03-12-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			0.600	1,025.00	615.00
				09 - Settlement/Mediation - finalize draft and send settlement offer						
03-12-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.800	1,025.00	820.00
				11 - Correspondence/Communications - email w veritext re ex misnumbering						
03-12-2024	Approved		Billable	05 - Motion	Monteverde, Juan			0.300	1,025.00	307.50
				05 - Motion - order re class cert briefing						
03-13-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.300	1,025.00	1,332.50
				11 - Correspondence/Communications - emails re exh mistake and veritext input re same						
03-14-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - depo exhibit snafu						
03-15-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - expert depo schedule						
03-16-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			6.000	1,025.00	6,150.00
				03 - Discovery - draft responses to 109 admissions						
03-17-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			3.000	1,025.00	3,075.00
				03 - Discovery - review/edit responses from plfts to rogs and adm						

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
03-18-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			1.000	1,025.00	1,025.00
				12 - Analyze and review - review defs R&O rfa and 2nd rogs from pltfs						
03-18-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			2.700	1,025.00	2,767.50
				03 - Discovery - finalize LP suppl resp to rogs and admissions						
03-19-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications- emails re discovery and MC, and emials w expert re depo						
03-22-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.500	1,025.00	2,562.50
				12 - Analyze and review - disocvery issues and review responses						
03-22-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - prep and call w defs re outstanding disocvery						
03-24-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.000	1,025.00	2,050.00
				12 - Analyze and review - defs responses and supplement						
03-24-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.600	1,025.00	615.00
				11 - Correspondence/Communications - emails w Mike P re defs objections to disocvery						
03-25-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			1.000	1,025.00	1,025.00
				03 - Discovery - review/edit revised reponses for pltf admissions						
03-25-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails re disocvery						
03-27-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.600	1,025.00	1,640.00
				11 - Correspondence/Communications - emails and call re discovery dispute an d supplemental request						
04-01-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			1.200	1,025.00	1,230.00
				03 - Discovery - review new survey responses						
04-03-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			6.000	1,025.00	6,150.00
				03 - Discovery - supplemental prod for 3rpf						
04-21-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			8.000	1,025.00	8,200.00
				12 - Analyze and review - expert reports						
04-22-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			7.000	1,025.00	7,175.00
				04 - Deposition - prep Jeffers depo						
04-22-2024	Approved		Billable	05 - Motion	Monteverde, Juan			0.500	1,025.00	512.50
				05 - Motion - review defs response to class cert						

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
04-23-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			8.000	1,025.00	8,200.00
				04 - Deposition - prep and defend Jeffers depo						
05-05-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			8.000	1,025.00	8,200.00
				12 - Analyze and review - expert reports						
05-06-2024	Approved		Billable	04 - Deposition	Monteverde, Juan			10.000	1,025.00	10,250.00
				04 - Deposition - prep Dr. Gompers depo and confer w Jeffers re questions						
05-07-2024	Approved		Billable	03 - Discovery	Monteverde, Juan			12.000	1,025.00	12,300.00
				03 - Discovery - travel to/fm Boston and conduct Dr. Gompers depo						
05-14-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.000	1,025.00	1,025.00
				09 - Settlement/Mediation - confer w Mike p and draft mediation conditions email						
05-21-2024	Approved		Billable	05 - Motion	Monteverde, Juan			0.600	1,025.00	615.00
				05 - Motion draft/edit reply to class cert						
05-22-2024	Approved		Billable	13 - Experts	Monteverde, Juan			2.500	1,025.00	2,562.50
				13 - Experts - review GOMPERS depo tr and forward/discuss w Jeffers						
05-23-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - class cert stip						
05-24-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - class cert order and emails re stip moot						
06-09-2024	Approved		Billable	05 - Motion	Monteverde, Juan			7.000	1,025.00	7,175.00
				05 - Motion - MSJ						
06-12-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.500	1,025.00	1,537.50
				05 - Motion - dec for msj						
06-13-2024	Approved		Billable	05 - Motion	Monteverde, Juan			2.500	1,025.00	2,562.50
				05 - Motion - review/coordinate msj exs						
07-07-2024	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			2.000	1,025.00	2,050.00
				17 - Case Schedule/CMC/Reports - draft report for pre trial conf						
07-07-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.300	1,025.00	307.50
				11 - Correspondence/Communications - pretrial conference report						
07-16-2024	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			1.000	1,025.00	1,025.00
				17 - Case Schedule/CMC/Reports - review defs edits and confirm						
07-17-2024	Approved		Billable	17 - Case Schedule/CMC/Reports	Monteverde, Juan			0.600	1,025.00	615.00

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
17 - Case Schedule/CMC/Reports - finalize and file joint status report										
07-24-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.800	1,025.00	820.00
11 - Correspondence/Communications - emails re pre trial conference and mediaiton status										
07-26-2024	Approved		Billable	05 - Motion	Monteverde, Juan			2.500	1,025.00	2,562.50
05 - Motion - review/edit opp to Jeffers daubert										
07-26-2024	Approved		Billable	07 - Court Hearing	Monteverde, Juan			1.000	1,025.00	1,025.00
07 - Court Hearing - schedule and status of mediation										
07-29-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
11 - Correspondence/Communications - mediation and dates										
07-30-2024	Approved		Billable	05 - Motion	Monteverde, Juan			2.000	1,025.00	2,050.00
05 - Motion - review/edit msj opp										
08-06-2024	Approved		Billable	05 - Motion	Monteverde, Juan			3.800	1,025.00	3,895.00
05 - Motion - review defs opp to msj										
08-08-2024	Approved		Billable	05 - Motion	Monteverde, Juan			0.200	1,025.00	205.00
05 - Motion - edit courtesy chambers copy letter										
08-16-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.600	1,025.00	615.00
11 - Correspondence/Communications - mediation logistics										
08-24-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - w mediator murphy re case and msj										
09-03-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.400	1,025.00	410.00
11 - Correspondence/Communications - msj and daubert logistics and courtesy copies										
09-11-2024	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			0.500	1,025.00	512.50
14 - Meeting/Strategy - w Carter re mediation and reply and guide him re same										
09-14-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			2.500	1,025.00	2,562.50
09 - Settlement/Mediation - review/edit reply for mediaiton										
09-17-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.500	1,025.00	1,537.50
05 - Motion - eidts to gompers daubert reply										
09-18-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			0.400	1,025.00	410.00
09 - Settlement/Mediation emails re logistics for mediation										
09-19-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
05 - Motion - review/edit reply for gompers daubert and msj										
09-19-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.300	1,025.00	307.50
11 - Correspondence/Communications - w murphy for pre call										
09-20-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - prep and conduct pre call w Murphy mediator										
09-20-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - mediaiton and attendance and strategy										
09-21-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			3.100	1,025.00	3,177.50
09 - Settlement/Mediation - edit ppt										
09-22-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			4.000	1,025.00	4,100.00
09 - Settlement/Mediation - prep and edit ppt										
09-23-2024	Approved		Billable	06 - Preparation Hearing/Trial	Monteverde, Juan			6.000	1,025.00	6,150.00
06 - Preparation Hearing/Trial - reivew mediaiton statements and outline key points										
09-24-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			8.000	1,025.00	8,200.00
09 - Settlement/Mediation - prep and attend mediation w Murphy										
09-27-2024	Approved		Billable	06 - Preparation Hearing/Trial	Monteverde, Juan			1.200	1,025.00	1,230.00
06 - Preparation Hearing/Trial - discuss potential negligence plan b plan and using jury insturctions for it.										
09-27-2024	Approved		Billable	15 - Research	Monteverde, Juan			2.000	1,025.00	2,050.00
15 - Research - negligence and subjective falsity similarities and interplay in Jury insturcitons										
09-27-2024	Approved		Billable	06 - Preparation Hearing/Trial	Monteverde, Juan			3.200	1,025.00	3,280.00
06 - Preparation Hearing/Trial - review mediation ppt and MSJ angles										
09-27-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
05 - Motion - review orders re seal issues and assign to ben/carter										
09-29-2024	Approved		Billable	06 - Preparation Hearing/Trial	Monteverde, Juan			2.000	1,025.00	2,050.00
06 - Preparation Hearing/Trial - msj and daubert organization and emails re same and binders										
10-01-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
11 - Correspondence/Communications - jury instructions										

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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
10-02-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			8.000	1,025.00	8,200.00
				06 - Preparation Hearing/Trial - MSJ and PPT						
10-03-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails re trial prep						
10-05-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			4.000	1,025.00	4,100.00
				06 - Preparation Hearing/Trial - draft/edit voir dire questions and jury instructions						
10-06-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			5.800	1,025.00	5,945.00
				06 - Preparation Hearing/Trial - review/edit proposed stipulated facts						
10-07-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			5.000	1,025.00	5,125.00
				06 - Preparation Hearing/Trial - jury instructions						
10-08-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.300	1,025.00	1,332.50
				05 - Motion - review update msj and daubert to seal						
10-08-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - prep an dcall w defs re trial prep/exchange						
10-08-2024	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			1.000	1,025.00	1,025.00
				17 - Case Schedule/CMC/Reports - review trial schedule and order						
10-09-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			2.000	1,025.00	2,050.00
				06 - Preparation Hearing/Trial - review/edit voir dire questions						
10-09-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			6.000	1,025.00	6,150.00
				06 - Preparation Hearing/Trial - draft/edit ppt for msj						
10-10-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - motions to seal revised						
10-18-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			4.000	1,025.00	4,100.00
				06 - Preparation Hearing/Trial - msj						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
10-19-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			7.000	1,025.00	7,175.00
				06 - Preparation Hearing/Trial - edit and update ppt						
10-22-2024	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			4.000	1,025.00	4,100.00
				14 - Meeting/Strategy - trial witness and research subpoena rules, confer w group						
10-23-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			4.700	1,025.00	4,817.50
				06 - Preparation Hearing/Trial - review depo transcripts						
10-23-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.600	1,025.00	615.00
				11 - Correspondence/Communications - mediator murphy re settlement						
10-24-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			6.000	1,025.00	6,150.00
				06 - Preparation Hearing/Trial - review depo transcripts for msj and january trial						
10-25-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			3.600	1,025.00	3,690.00
				06 - Preparation Hearing/Trial - draft proposed opening statement for trial						
10-27-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			4.500	1,025.00	4,612.50
				06 - Preparation Hearing/Trial - msj						
10-28-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			8.000	1,025.00	8,200.00
				06 - Preparation Hearing/Trial - msj						
10-28-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.400	1,025.00	1,435.00
				11 - Correspondence/Communications - call w Mediator and confer w Mike P after to bring him up to speed						
10-29-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			5.500	1,025.00	5,637.50
				06 - Preparation Hearing/Trial - msj						
10-29-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.000	1,025.00	1,025.00
				09 - Settlement/Mediation - call w mediator Murphy and confer w team/KSF						
10-30-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			6.000	1,025.00	6,150.00
				06 - Preparation Hearing/Trial - msj						
10-30-2024	Approved		Billable	05 - Motion	Monteverde, Juan			0.600	1,025.00	615.00
				05 - Motion - stip to adjourn msj pending settlement talks						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
10-31-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - mediator Murphy						
10-31-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - stip to adjourn msj re settlement, confer w defs re same						
11-02-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails/calls w bruce and barbara re potential settlement status						
11-06-2024	Approved		Billable	06 - Preparation Hearing/ Trial	Monteverde, Juan			2.400	1,025.00	2,460.00
				06 - Preparation Hearing/Trial - MSJ and review Daubert outline/ppt from Mike						
11-07-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - emial w client re settlement 27.5m						
11-07-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.400	1,025.00	1,435.00
				09 - Settlement/Mediation - attention to notice of settlement and inform court of same						
11-08-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - settlement and next steps						
11-13-2024	Approved		Billable	17 - Case Schedule/CMC/ Reports	Monteverde, Juan			0.200	1,025.00	205.00
				17 - Case Schedule/CMC/Reports - review order vacating trial						
11-13-2024	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			0.500	1,025.00	512.50
				14 - Meeting/Strategy - confer w Beth re timing for stip of settl and briefs.						
11-14-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			3.000	1,025.00	3,075.00
				09 - Settlement/Mediation - review stip and exs - edit same						
11-15-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			4.600	1,025.00	4,715.00
				09 - Settlement/Mediation - review/edt stip of settlement						
11-18-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications emails w LW re stip of settl						
11-19-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - emails w Rust re potential bid						
11-19-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			2.000	1,025.00	2,050.00
				09 - Settlement/Mediation - plan of allocation						



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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
11-20-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			2.300	1,025.00	2,357.50
				11 - Correspondence/Communications - emails and bid from Rust, emails w Beth and Mike re plan of allocation, review papa murphy and others, plus tender timeline						
11-21-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - RG2 bid						
11-22-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - AB Data re bid						
11-22-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.800	1,025.00	1,845.00
				09 - Settlement/Mediation - review/edit stip of settl and exs, chat w beth						
11-26-2024	Approved		Billable	15 - Research	Monteverde, Juan			1.400	1,025.00	1,435.00
				15 - Research - NDCA Guidance rules and confer w team						
12-02-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.600	1,025.00	615.00
				11 - Correspondence/Communications						
12-02-2024	Approved		Billable	12 - Analyze and review	Monteverde, Juan			2.000	1,025.00	2,050.00
				12 - Analyze and review - multiple bids from class admins						
12-03-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - emails re settlement						
12-04-2024	Approved		Billable	15 - Research	Monteverde, Juan			1.400	1,025.00	1,435.00
				15 - Research - service awards						
12-05-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - stip status						
12-06-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			0.800	1,025.00	820.00
				11 - Correspondence/Communications - RG2 bid and revisions w higher claim rate						
12-11-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.200	1,025.00	1,230.00
				11 - Correspondence/Communications - beth and mike re counter to blow up and other issues w defs edits to stip of settl						
12-12-2024	Approved		Billable	11 - Correspondence/ Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
12-12-2024	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			2.000	1,025.00	2,050.00
				09 - Settlement/Mediation - stip and exs revisions						
12-17-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.500	1,025.00	1,537.50
				11 - Correspondence/Communications						
12-17-2024	Approved		Billable	05 - Motion	Monteverde, Juan			1.000	1,025.00	1,025.00
				05 - Motion - prel app and review Oclaro docs re same						
12-18-2024	Approved		Billable	05 - Motion	Monteverde, Juan			2.500	1,025.00	2,562.50
				05 - Motion - prel approvall, provide working draft to defs to review/consent						
12-19-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.800	1,025.00	820.00
				11 - Correspondence/Communications - admin bids						
12-20-2024	Approved		Billable	15 - Research	Monteverde, Juan			1.000	1,025.00	1,025.00
				15 - Research - class cert order v settlement approval						
12-20-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails and calls w defs re status of stip and same w team						
12-23-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.200	1,025.00	205.00
				11 - Correspondence/Communications - emails w defs re stip and signature timing						
12-24-2024	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.400	1,025.00	410.00
				11 - Correspondence/Communications - emails re timing to sign stip						
12-26-2024	Approved		Billable	05 - Motion	Monteverde, Juan			2.000	1,025.00	2,050.00
				05 - Motion - review/edit prel approval brief						
01-03-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.000	1,025.00	1,025.00
				09 - Settlement/Mediation - notice re settlement update						
01-09-2025	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - emails w Bill and Tina re bank account timing and accelartion.						
01-10-2025	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.500	1,025.00	512.50
				11 - Correspondence/Communications - emails re cy pres						
01-13-2025	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.600	1,025.00	615.00
				11 - Correspondence/Communications - emials w RG2 re bank account and Tax Id.						

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Monteverde, Juan</b>										
01-14-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			0.500	1,025.00	512.50
				09 - Settlement/Mediation - ETF forms from Nestle and coordinate w RG2 re same.						
01-15-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.200	1,025.00	1,230.00
				09 - Settlement/Mediation - emails and update ETF agreement and forms w Nestle.						
01-16-2025	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			1.000	1,025.00	1,025.00
				11 - Correspondence/Communications - emails and calls w defs re status of stip and exectuion.						
01-17-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.500	1,025.00	1,537.50
				09 - Settlement/Mediation - final review, finalize stip and exs, execute same.						
02-27-2025	Approved		Billable	06 - Preparation Hearing/Trial	Monteverde, Juan			8.000	1,025.00	8,200.00
				06 - Preparation Hearing/Trial - JFK-SFO and prep						
02-28-2025	Approved		Billable	07 - Court Hearing	Monteverde, Juan			8.000	1,025.00	8,200.00
				07 - Court Hearing - Attend Prel Approval Hearing and travel back to JFK						
03-02-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			4.700	1,025.00	4,817.50
				09 - Settlement/Mediation - revise prel app order and exs						
03-04-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.200	1,025.00	1,230.00
				09 - Settlement/Mediation - finalize prel app order and exs, confer w defs re same						
03-05-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			0.500	1,025.00	512.50
				09 - Settlement/Mediation - File revised prel app order and exs, provide copies to chambers.						
03-07-2025	Approved		Billable	14 - Meeting/Strategy	Monteverde, Juan			1.000	1,025.00	1,025.00
				14 - Meeting/Strategy - Final approval and fee motion , confer w team and KSF						
03-21-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.000	1,025.00	1,025.00
				09 - Settlement/Mediation - update PR and prep load with pr distributor, review proof and approve for issuance						
03-24-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			0.700	1,025.00	717.50
				09 - Settlement/Mediation - class admin website review/update						
04-11-2025	Approved		Billable	11 - Correspondence/Communications	Monteverde, Juan			0.600	1,025.00	615.00
				11 - Correspondence/Communications - shareholders re claims						
04-21-2025	Approved		Billable	09 - Settlement/Mediation	Monteverde, Juan			1.000	1,025.00	1,025.00
				09 - Settlement/Mediation - review prel app hearing transcript						
04-23-2025	Approved		Billable	10 - Fee Petition	Monteverde, Juan			2.700	1,025.00	2,767.50
				10 - Fee Petition - review/edit fee brief						
05-01-2025	Approved		Billable	10 - Fee Petition	Monteverde, Juan			1.000	1,025.00	1,025.00
				10 - Fee Petition - Final read and finalize						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
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***Aimmune Therapeutics*****Merger****Monteverde, Juan**

**Professional Total 1128.700 1,156,917.50**

**Schreiner, Miles**

09-21-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Schreiner, Miles			5.000	850.00	4,250.00
				01 - Case Development, Investigation and review corporate filings; review draft complaint; call with jordan re drafting of complaint; legal research re same						
12-14-2020	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			0.300	850.00	255.00
				14 - Meeting/Strategy re lead motion with juan						
12-15-2020	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			0.300	850.00	255.00
				11 - Correspondence/Communications - review ecf emails re court orders						
12-28-2020	Approved		Billable	05 - Motion	Schreiner, Miles			7.000	850.00	5,950.00
				05 - Motion - revise/edit response re lead plaintiff motion and re-notice of motions; legal research re same; calls with Juan re same						
01-03-2022	Approved		Billable	15 - Research	Schreiner, Miles			0.300	850.00	255.00
				15 - Research re local rules re mtd and judge's standing orders re same						
01-04-2022	Approved		Billable	15 - Research	Schreiner, Miles			0.800	850.00	680.00
				15 - Research re safe harbor not applying to tender offers and call/email with co counsel re same						
01-07-2022	Approved		Billable	05 - Motion	Schreiner, Miles			4.100	850.00	3,485.00
				05 - Motion - review/analyze draft MTD opp, complaint and def MTD brief and cases cited						
01-10-2022	Approved		Billable	05 - Motion	Schreiner, Miles			9.300	850.00	7,905.00
				05 - Motion - draft/revise/edit MTD opp and legal research re same; calls/meetings with co counsel re same;						
01-11-2022	Approved		Billable	05 - Motion	Schreiner, Miles			10.100	850.00	8,585.00
				05 - Motion - draft/revise/edit MTD opp and legal research re same; calls/meetings with co counsel re same; prepare proposed order for same; file same						
01-14-2022	Approved		Billable	15 - Research	Schreiner, Miles			0.300	850.00	255.00
				15 - Research re local rules re courtesy copies and email to Casey re same						
01-19-2022	Approved		Billable	05 - Motion	Schreiner, Miles			1.700	850.00	1,445.00
				05 - Motion - draft stip re MTD hearing continuance and review local rules re same						
02-15-2022	Approved		Billable	15 - Research	Schreiner, Miles			0.800	850.00	680.00
				15 - Research re motion to strike new arguments raised on reply						
02-18-2022	Approved		Billable	15 - Research	Schreiner, Miles			0.800	850.00	680.00
				15 - Research re motion to strike new arguments						
02-21-2022	Approved		Billable	05 - Motion	Schreiner, Miles			1.300	850.00	1,105.00
				05 - Motion objection to new arguments on reply and research re same						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
02-22-2022	Approved		Billable	05 - Motion	Schreiner, Miles			1.000	850.00	850.00
				05 - Motion objection to new arguments on reply						
03-09-2022	Approved		Billable	05 - Motion	Schreiner, Miles			1.600	850.00	1,360.00
				05 - Motion - draft/revise surreply re MTD and legal research re same;						
03-10-2022	Approved		Billable	05 - Motion	Schreiner, Miles			9.100	850.00	7,735.00
				05 - Motion - draft/revise surreply re MTD and legal research re same; emails with co counsel re same						
03-11-2022	Approved		Billable	05 - Motion	Schreiner, Miles			9.600	850.00	8,160.00
				05 - Motion - draft/revise surreply re MTD and legal research re same; emails with co counsel re same						
04-25-2022	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			1.000	850.00	850.00
				14 - Meeting/Strategy with juan re upcoming MTD hearing						
04-28-2022	Approved		Billable	06 - Preparation Hearing/ Trial	Schreiner, Miles			3.600	850.00	3,060.00
				06 - Preparation Hearing/Trial - review/edit powerpoint for MTD; calls with john and juan re same and argument preparation; review/ analyze briefs and cases in connection with same						
04-29-2022	Approved		Billable	07 - Court Hearing	Schreiner, Miles			4.500	850.00	3,825.00
				07 - Court Hearing on defendants' mtd; calls/emails with juan to prepare for same; post hearing calls with team and co counsel to discuss case strategy						
05-12-2022	Approved		Billable	12 - Analyze and review	Schreiner, Miles			0.500	850.00	425.00
				12 - Analyze and review CMC statement and email to juan re same						
06-06-2022	Approved		Billable	03 - Discovery	Schreiner, Miles			3.100	850.00	2,635.00
				03 - Discovery re 26(f) report section re private right of action and legal research re same; meeting with juan re same						
07-01-2022	Approved		Billable	03 - Discovery	Schreiner, Miles			1.000	850.00	850.00
				03 - Discovery - review/analyze 1st RFP to Aimmune and email with Juan re same						
09-07-2022	Approved		Billable	05 - Motion	Schreiner, Miles			1.000	850.00	850.00
				draft motion to extend briefing on 12c motion						
09-19-2022	Approved		Billable	05 - Motion	Schreiner, Miles			7.300	850.00	6,205.00
				05 - Motion - draft/revise opposition to defendants' rule 12(c) motion and legal research re same						
09-20-2022	Approved		Billable	05 - Motion	Schreiner, Miles			3.100	850.00	2,635.00
				05 - Motion - draft/revise opposition to defendants' rule 12(c) motion and legal research re same						
09-21-2022	Approved		Billable	05 - Motion	Schreiner, Miles			8.200	850.00	6,970.00
				05 - Motion - draft/revise opposition to defendants' rule 12(c) motion and legal research re same						
09-22-2022	Approved		Billable	05 - Motion	Schreiner, Miles			9.200	850.00	7,820.00
				05 - Motion - draft/revise opposition to defendants' rule 12(c) motion and legal research re same						
09-23-2022	Approved		Billable	05 - Motion	Schreiner, Miles			9.400	850.00	7,990.00
				05 - Motion - draft/revise opposition to defendants' rule 12(c) motion and legal research re same						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
09-27-2022	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			0.500	850.00	425.00
				14 - Meeting/Strategy with case strategy						
10-07-2022	Approved		Billable	03 - Discovery	Schreiner, Miles			1.200	850.00	1,020.00
				03 - Discovery - revise/edit ESI search terms and review proxy re same						
10-11-2022	Approved		Billable	12 - Analyze and review	Schreiner, Miles			1.900	850.00	1,615.00
				12 - Analyze and review defendants reply in support of 12(c) motion and cases cited; email with co counsel re same						
11-12-2022	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			0.900	850.00	765.00
				06 - Preparation Hearing/Trial - review Juan's outline for 12(c) hearing and review briefs re same; email to Juan re same						
11-15-2022	Approved		Billable	03 - Discovery	Schreiner, Miles			4.300	850.00	3,655.00
				03 - Discovery - review/analyze/edit responses to interrogatories and RFPs						
11-17-2022	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			0.500	850.00	425.00
				14 - Meeting/Strategy with Juan re 12(c) hearing; review briefs and cases cited re same						
11-18-2022	Approved		Billable	07 - Court Hearing	Schreiner, Miles			1.500	850.00	1,275.00
				07 - Court Hearing on 12(c) motion						
11-18-2022	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			3.600	850.00	3,060.00
				14 - Meeting/Strategy with Juan re 12(c) hearing; review briefs and cases cited re same; post-hearing meetings re case strategy						
11-28-2022	Approved		Billable	03 - Discovery	Schreiner, Miles			2.100	850.00	1,785.00
				03 - Discovery - review/analyze Ms. Pemberton's responses to RFPs and interrogatories						
11-28-2022	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			0.500	850.00	425.00
				14 - Meeting/Strategy with Juan re 12(c) hearing; review briefs and cases cited re same						
12-20-2022	Approved		Billable	03 - Discovery	Schreiner, Miles			1.600	850.00	1,360.00
				03 - Discovery - review and edit ESI search parameters; emails with co counsel re same						
12-22-2022	Approved		Billable	12 - Analyze and review	Schreiner, Miles			2.400	850.00	2,040.00
				12 - Analyze and review defendants' 1292 motion for interlocutory appeal and emails with juan and co counsel re same						
12-23-2022	Approved		Billable	12 - Analyze and review	Schreiner, Miles			1.600	850.00	1,360.00
				12 - Analyze and review defendants' 1292 motion for interlocutory appeal and emails with juan and co counsel re same; draft stip to extend briefing schedule						
12-26-2022	Approved		Billable	11 - Correspondence/Communications	Schreiner, Miles			0.600	850.00	510.00
				11 - Correspondence/Communications re stipulation to extend briefing on 1292 motion and file same						
01-05-2023	Approved		Billable	05 - Motion	Schreiner, Miles			0.800	850.00	680.00
				05 - Motion - draft stipulation continuing hearing on 1292 motion and emails with defense counsel re same						
01-18-2023	Approved		Billable	05 - Motion	Schreiner, Miles			9.900	850.00	8,415.00
				05 - Motion - draft/revise opposition to defendants' motion for certificate of appealability and legal research re same						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
01-19-2023	Approved		Billable	05 - Motion	Schreiner, Miles			10.100	850.00	8,585.00
				05 - Motion - draft/revise opposition to defendants' motion for certificate of appealability and legal research re same						
01-20-2023	Approved		Billable	05 - Motion	Schreiner, Miles			11.100	850.00	9,435.00
				05 - Motion - draft/revise opposition to defendants' motion for certificate of appealability and legal research re same						
01-23-2023	Approved		Billable	05 - Motion	Schreiner, Miles			6.800	850.00	5,780.00
				05 - Motion - draft/revise opposition to defendants' motion for certificate of appealability and legal research re same						
01-24-2023	Approved		Billable	05 - Motion	Schreiner, Miles			11.300	850.00	9,605.00
				05 - Motion - draft/revise opposition to defendants' motion for certificate of appealability and legal research re same						
01-25-2023	Approved		Billable	05 - Motion	Schreiner, Miles			11.800	850.00	10,030.00
				05 - Motion - draft/revise opposition to defendants' motion for certificate of appealability and legal research re same						
02-04-2023	Approved		Billable	12 - Analyze and review	Schreiner, Miles			3.100	850.00	2,635.00
				12 - Analyze and review defendants' reply re 1292 motion and cases cited; emails with co counsel re same						
02-18-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Schreiner, Miles			2.400	850.00	2,040.00
				06 - Preparation Hearing/Trial - help Juan prepare for tomorrow's 1292 hearing and review briefs and cases re same; email with juan re same						
02-22-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Schreiner, Miles			2.000	850.00	1,700.00
				06 - Preparation Hearing/Trial - help Juan prepare for tomorrow's 1292 hearing and review briefs and cases re same; meetings with juan re same						
02-23-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Schreiner, Miles			3.600	850.00	3,060.00
				06 - Preparation Hearing/Trial - help Juan prepare for tomorrow's 1292 hearing and review briefs and cases re same; emails and calls re same						
02-24-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Schreiner, Miles			4.500	850.00	3,825.00
				06 - Preparation Hearing/Trial - help Juan prepare for 1292 hearing and review briefs and cases re same; emails and calls re same; attend hearing via zoom						
03-08-2023	Approved		Billable	15 - Research	Schreiner, Miles			2.100	850.00	1,785.00
				15 - Research re discovery under Hague convention re. subpoena to Nestle; email/meeting with jonathan re same						
03-08-2023	Approved		Billable	05 - Motion	Schreiner, Miles			5.300	850.00	4,505.00
				05 - Motion - review/analyze motion for Hague convention letter and emails with co counsel re same; research in connection with same						
03-13-2023	Approved		Billable	05 - Motion	Schreiner, Miles			3.800	850.00	3,230.00
				05 - Motion - revise/edit motion for letters rogatory re nestle and legal research re same; meetings with jonathan re same						
03-28-2023	Approved		Billable	05 - Motion	Schreiner, Miles			2.600	850.00	2,210.00



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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
				05 - Motion - review reply re Hague convention letter request and emails re same; meeting with jonathan re same						
03-30-2023	Approved		Billable	05 - Motion	Schreiner, Miles			1.300	850.00	1,105.00
				05 - Motion - review stip and proposed order re Hague convention letter for Nestle; emails/calls with co counsel re same						
04-03-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			6.100	850.00	5,185.00
				03 - Discovery - review/analyze aimune production						
04-04-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.200	850.00	3,570.00
				03 - Discovery - review/analyze aimune production						
04-05-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			8.800	850.00	7,480.00
				03 - Discovery - review/analyze aimune production						
04-07-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			6.600	850.00	5,610.00
				03 - Discovery - review/analyze Aimmune document production						
04-08-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.200	850.00	3,570.00
				03 - Discovery - review/analyze Aimmune document production						
04-10-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			6.600	850.00	5,610.00
				03 - Discovery - review/analyze Aimmune document production						
04-11-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			5.900	850.00	5,015.00
				03 - Discovery - review/analyze Aimmune document production						
04-12-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.600	850.00	3,910.00
				03 - Discovery - review/analyze Aimmune document production						
04-14-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.300	850.00	3,655.00
				03 - Discovery - review/analyze aimune production						
05-30-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.600	850.00	3,910.00
				03 - Discovery - review/analyze documents						
05-31-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			2.800	850.00	2,380.00
				03 - Discovery - review/analyze documents						
06-01-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			5.400	850.00	4,590.00
				03 - Discovery - review/analyze documents						
06-02-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			5.200	850.00	4,420.00
				03 - Discovery - review/analyze documents						
06-09-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			0.800	850.00	680.00
				03 - Discovery - review/edit ESI serach terms for bankers; email to juan re same						
06-21-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			5.600	850.00	4,760.00
				03 - Discovery - review/analyze documents regarding treatment period and meetings with jonahtan re same						
06-22-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			3.600	850.00	3,060.00



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
03 - Discovery - review/analyze/edit class survey and calls/emails with juan and jonathan re same; review/analyze documents										
06-23-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			1.200	850.00	1,020.00
03 - Discovery revise/edit survey to class and emails/calls with juan re same										
06-23-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			6.300	850.00	5,355.00
03 - Discovery - review/analyze documents										
09-25-2023	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			0.300	850.00	255.00
11 - Correspondence/Communications - emails re. discovery with defense counsel										
09-29-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			3.400	850.00	2,890.00
03 - Discovery analyze/review documents										
09-29-2023	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			0.500	850.00	425.00
11 - Correspondence/Communications - review emails re discovery plan										
09-29-2023	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Schreiner, Miles			0.500	850.00	425.00
01 - Case Development, Investigation and review corporate filings - review "case plan" tasks and dates										
10-02-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			5.100	850.00	4,335.00
03 - Discovery analyze/review documents										
10-03-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			6.000	850.00	5,100.00
03 - Discovery analyze/review documents										
10-03-2023	Approved		Billable	12 - Analyze and review	Schreiner, Miles			2.600	850.00	2,210.00
12 - Analyze and review director biographies memo to prepare for upcoming depositions										
10-03-2023	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			0.300	850.00	255.00
11 - Correspondence/Communications - reive emails re case plan and discovery timing										
10-04-2023	Approved		Billable	12 - Analyze and review	Schreiner, Miles			0.500	850.00	425.00
12 - Analyze and review email re banker discovery issues and Dallas experience memo										
10-04-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			2.300	850.00	1,955.00
03 - Discovery - review/analyze Ben's timeline insert										
10-04-2023	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Schreiner, Miles			1.400	850.00	1,190.00
01 - Case Development, Investigation and review corporate filings - review filings related to Nestle sale of Palforzia to assess impact on case; emails and calls to co counsel re same										
10-06-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			5.300	850.00	4,505.00

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
				03 - Discovery analyze/review documents						
10-09-2023	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			1.000	850.00	850.00
				14 - Meeting/Strategy re discovery, case strategy						
10-10-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			1.000	850.00	850.00
				03 - Discovery - review/analyze requests for admissions and emails re same						
10-17-2023	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			2.300	850.00	1,955.00
				14 - Meeting/Strategy re class certification and client depositions and legal research re same						
10-17-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.600	850.00	3,910.00
				03 - Discovery - reivew/analyze documents						
10-18-2023	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			0.500	850.00	425.00
				11 - Correspondence/Communications - review emails re depositons and meetings with juan re same and case strategy						
10-18-2023	Approved		Billable	12 - Analyze and review	Schreiner, Miles			0.300	850.00	255.00
				12 - Analyze and review - updated case plan						
11-06-2023	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			1.200	850.00	1,020.00
				14 - Meeting/Strategy with team re case strategy and upcoming depositions and letter of request for swiss depositions and research re same						
11-07-2023	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			1.000	850.00	850.00
				14 - Meeting/Strategy with team re letter of request for swiss depositions and research re same						
11-13-2023	Approved		Billable	15 - Research	Schreiner, Miles			1.100	850.00	935.00
				15 - Research - re class certification and corporate scienter and emails/meeting with juan re same						
11-14-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			1.400	850.00	1,190.00
				03 - Discovery - review subpoena to Stallergenes Greer						
11-14-2023	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			0.500	850.00	425.00
				14 - Meeting/Strategy with juan re Palforzia sale and emails re same						
11-14-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.100	850.00	3,485.00
				03 - Discovery - review/analyze discovery						
11-15-2023	Approved		Billable	04 - Deposition	Schreiner, Miles			9.100	850.00	7,735.00
				04 - Deposition - review/analyze deposition outline for director Enright and SEC filings/documents in connection with same						
11-16-2023	Approved		Billable	15 - Research	Schreiner, Miles			1.000	850.00	850.00
				15 - Research re class certification						
11-16-2023	Approved		Billable	04 - Deposition	Schreiner, Miles			8.000	850.00	6,800.00
				04 - Deposition - review/analyze deposition outline for director Enright and SEC filings/documents in connection with same						
11-17-2023	Approved		Billable	04 - Deposition	Schreiner, Miles			7.500	850.00	6,375.00
				04 - Deposition - attend deposition of Mr. Enright and review/analyze documents re same;						

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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
11-27-2023	Approved		Billable	04 - Deposition	Schreiner, Miles			2.500	850.00	2,125.00
				04 - Deposition - prepare for upcoming depositions by reviewing documents and complaint and 14D9 and meeting with juan re same						
11-28-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			2.000	850.00	1,700.00
				03 - Discovery - review/analyze defendants' responses and objections to 1st interrogatories and documents identified therein; meeting with juan re same						
11-28-2023	Approved		Billable	04 - Deposition	Schreiner, Miles			5.800	850.00	4,930.00
				04 - Deposition - attend deposition of director McDade and prepare for same; post deposition meeting with juan re same						
12-04-2023	Approved		Billable	15 - Research	Schreiner, Miles			1.000	850.00	850.00
				15 - Research re marital privilege in connection with upcoming depositions; meeting with juan re same						
12-06-2023	Approved		Billable	15 - Research	Schreiner, Miles			2.500	850.00	2,125.00
				15 - Research re marital privilege in connection with plaintiffs' depositions; email and meeting re same						
12-19-2023	Approved		Billable	04 - Deposition	Schreiner, Miles			4.000	850.00	3,400.00
				04 - Deposition - listen in to Hendrix deposition and meetings with Benjamin and juan re same						
12-21-2023	Approved		Billable	04 - Deposition	Schreiner, Miles			2.500	850.00	2,125.00
				listen in on Deposition Greg Behar and meetings with juan/benjamin re same						
12-28-2023	Approved		Billable	03 - Discovery	Schreiner, Miles			4.500	850.00	3,825.00
				03 - Discovery - review analyze 10th production						
01-08-2024	Approved		Billable	04 - Deposition	Schreiner, Miles			6.000	850.00	5,100.00
				04 - Deposition - review/analyze documents in connection with preparing for Falberg and Adelman depositions; reievw/analyze outline re same; meeting with juan re same						
01-09-2024	Approved		Billable	04 - Deposition	Schreiner, Miles			4.000	850.00	3,400.00
				04 - Deposition - review/analyze documents in connection with preparing for Falberg and Adelman depositions; reievw/analyze outline re same; meeting with juan re same						
01-10-2024	Approved		Billable	04 - Deposition	Schreiner, Miles			5.000	850.00	4,250.00
				04 - Deposition - review/analyze documents in connection with preparing for Falberg deposition; reievw/analyze outline re same; meeting with juan re same						
01-24-2024	Approved		Billable	15 - Research	Schreiner, Miles			2.500	850.00	2,125.00
				15 - Research re damages experts and class certification						
01-26-2024	Approved		Billable	15 - Research	Schreiner, Miles			1.800	850.00	1,530.00
				15 - Research re expert disclosure and attorney wrk product privilege ; email/call with juan re same						
01-31-2024	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			1.500	850.00	1,275.00
				14 - Meeting/Strategy - call with Mike re expert report and class cert; meeting with juan re same						
01-31-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			2.000	850.00	1,700.00
				03 - Discovery - review/analyze plaintiffs' sup responses to RFP and Third RFP and emails re same						
01-31-2024	Approved		Billable	14 - Meeting/Strategy	Schreiner, Miles			1.500	850.00	1,275.00

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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
				14 - Meeting/Strategy - call with defense counsel re discovery; prepare for same; post-call meeting with Juan						
02-07-2024	Approved		Billable	13 - Experts	Schreiner, Miles			5.500	850.00	4,675.00
				13 - Experts - review/analyze draft Jeffers report and docs cited; meeting with Juan re same						
02-14-2024	Approved		Billable	05 - Motion	Schreiner, Miles			4.000	850.00	3,400.00
				05 - Motion - legal research re class cert brief and emails/call with co counsel and Juan re same						
02-21-2024	Approved		Billable	05 - Motion	Schreiner, Miles			4.800	850.00	4,080.00
				05 - Motion - review/analyze/edit draft of class cert brief and legal research re same; call/email with co counsel re same						
02-29-2024	Approved		Billable	15 - Research	Schreiner, Miles			1.500	850.00	1,275.00
				15 - Research re Judge Chesney's class cert rulings and emails re same						
03-04-2024	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			1.000	850.00	850.00
				11 - Correspondence/Communications - emails and calls re class certification motion and review SEC filings re same						
03-06-2024	Approved		Billable	05 - Motion	Schreiner, Miles			12.300	850.00	10,455.00
				05 - Motion - review/edit motion for class certification legal research re same; emails/calls with co-counsel re same						
03-07-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.300	850.00	8,755.00
				05 - Motion - review/edit motion for class certification and prepare ancillary documents; legal research re same; emails/calls with co counsel re same						
03-08-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.800	850.00	9,180.00
				05 - Motion - review/edit motion for class certification and prepare ancillary documents; legal research re same; emails/calls with co counsel re same						
03-11-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			7.600	850.00	6,460.00
				03 - Discovery - review/analyze responses to interrogatories and request for admission; review/analyze discovery re same						
03-12-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			4.700	850.00	3,995.00
				03 - Discovery - review/analyze responses to interrogatories and request for admission; review/analyze discovery re same						
03-13-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			6.100	850.00	5,185.00
				03 - Discovery - review/analyze responses to interrogatories and request for admission; review/analyze discovery re same						
03-14-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			3.300	850.00	2,805.00
				03 - Discovery - review/analyze responses to interrogatories and request for admission; review/analyze discovery re same						
03-17-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			2.100	850.00	1,785.00
				03 - Discovery - review/analyze responses to interrogatories and request for admission; review/analyze discovery re same						
03-25-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			4.900	850.00	4,165.00
				03 - Discovery - review/analyze/edit responses and objections to interrogatories and requests for admission; meeting with Juan re same; email to Mike re same. Review discovery in connection with same and case strategy; call with defense counsel re discovery issues;						
03-26-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			8.500	850.00	7,225.00

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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
03 - Discovery - review/analyze/edit responses and objections to interrogatories and requests for admission; meeting with juan re same; email to Mike re same. Review discovery in connection with same and case strategy										
03-27-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			8.000	850.00	6,800.00
03 - Discovery analyze and review discovery/document review										
03-28-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			8.500	850.00	7,225.00
03 - Discovery analyze and review discovery/document review										
03-29-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			5.000	850.00	4,250.00
03 - Discovery analyze and review discovery/document review										
03-29-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			4.400	850.00	3,740.00
03 - Discovery - review/analyze/edit responses and objections to interrogatories and requests for admission; email to Mike re same. Review discovery in connection with same and case strategy;										
04-16-2024	Approved		Billable	13 - Experts	Schreiner, Miles			8.000	850.00	6,800.00
13 - Experts - review/analyze def expert report of Pual Gompers										
04-17-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			9.000	850.00	7,650.00
03 - Discovery - review/analyze documents and expert reports										
04-18-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			8.800	850.00	7,480.00
03 - Discovery - review/analyze documents and expert reports										
04-19-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			5.800	850.00	4,930.00
03 - Discovery - review/analyze documents and expert reports										
05-24-2024	Approved		Billable	05 - Motion	Schreiner, Miles			6.300	850.00	5,355.00
05 - Motion - review/edit motion for summary judgment and legal research re same										
05-31-2024	Approved		Billable	05 - Motion	Schreiner, Miles			4.200	850.00	3,570.00
05 - Motion - review/analyze draft daubert motion and motion in limine										
05-31-2024	Approved		Billable	15 - Research	Schreiner, Miles			1.000	850.00	850.00
15 - Research re ordinary course projections being reliable best estimates in connection with duabert motion; email to co counsel re same										
06-06-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.000	850.00	8,500.00
05 - Motion - reivew/analyze/edit motion for summary judgment and Daubert motion to exclude Gompers and legal research re same;										
06-07-2024	Approved		Billable	05 - Motion	Schreiner, Miles			8.000	850.00	6,800.00
05 - Motion - reivew/analyze/edit motion for summary judgment and Daubert motion to exclude Gompers and legal research re same; emails / calls with co counsel re same										
06-10-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.600	850.00	9,010.00
05 - Motion - reivew/analyze/edit motion for summary judgment and legal research re same; emails / calls with co counsel re same										
06-11-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.500	850.00	8,925.00

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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
				05 - Motion - reivew/analyze/edit motion for summary judgment and Daubert motion to exclude Gompers and legal research re same; emails / calls with co counsel re same						
06-12-2024	Approved		Billable	05 - Motion	Schreiner, Miles			11.500	850.00	9,775.00
				05 - Motion - reivew/analyze/edit motion for summary judgment and Daubert motion to exclude Gompers and legal research re same; emails / calls with co counsel re same						
06-13-2024	Approved		Billable	05 - Motion	Schreiner, Miles			11.000	850.00	9,350.00
				05 - Motion - reivew/analyze/edit motion for summary judgment and Daubert motion to exclude Gompers and legal research re same; emails / calls with co counsel re same						
06-14-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.600	850.00	9,010.00
				05 - Motion - reivew/analyze/edit motion for summary judgment and Daubert motion to exclude Gompers and legal research re same; emails / calls with co counsel re same						
06-17-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			6.500	850.00	5,525.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited;						
06-18-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			3.600	850.00	3,060.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited;						
06-20-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			6.700	850.00	5,695.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited and discovery re same;						
06-26-2024	Approved		Billable	15 - Research	Schreiner, Miles			4.000	850.00	3,400.00
				15 - Research re class notice after certification and draft summary of same						
06-26-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			5.000	850.00	4,250.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited; and discovery re same						
06-27-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			7.000	850.00	5,950.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited; and discovery re same						
06-27-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			2.700	850.00	2,295.00
				12 - Analyze and review filings re administrative motions to seal						
06-28-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			7.200	850.00	6,120.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited; and discovery re same						
07-08-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			5.300	850.00	4,505.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited and discovery re same						
07-09-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			5.000	850.00	4,250.00
				12 - Analyze and review defendants' motion for summary judgment and Daubert motion and cases cited and discovery re same						
07-16-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.300	850.00	8,755.00
				05 - Motion - review/analyze opposition to def. motion to exclude Jeffers and legal research re same						
07-17-2024	Approved		Billable	05 - Motion	Schreiner, Miles			5.000	850.00	4,250.00
				05 - Motion - review/analyze opposition to def. motion to exclude Jeffers and legal research re same						



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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
07-22-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.500	850.00	8,075.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same						
07-23-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.000	850.00	7,650.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same						
07-24-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.500	850.00	8,075.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same						
07-25-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.000	850.00	8,500.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same						
07-26-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.300	850.00	7,905.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same;						
07-29-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.200	850.00	8,670.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same;						
07-30-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.900	850.00	8,415.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same;						
07-31-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.300	850.00	8,755.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same						
08-01-2024	Approved		Billable	05 - Motion	Schreiner, Miles			12.100	850.00	10,285.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same						
08-02-2024	Approved		Billable	05 - Motion	Schreiner, Miles			11.200	850.00	9,520.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same						
08-05-2024	Approved		Billable	05 - Motion	Schreiner, Miles			12.800	850.00	10,880.00
				05 - Motion - review/analyze/edit oppositions to defendants MSJ and Daubert motion and legal research re same; analyze defendants' briefs and cases cited re same; analyze discovery cited re same; finalize filings for same						
08-06-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.400	850.00	7,990.00
				05 - Motion - reivew/analyze defendants' oppositions to plaintiffs' MPSJ and Daubert motion and cases and documents cited						
08-07-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.000	850.00	7,650.00
				05 - Motion - reivew/analyze defendants' oppositions to plaintiffs' MPSJ and Daubert motion and cases and documents cited; legal research and prepare for replies						
08-08-2024	Approved		Billable	05 - Motion	Schreiner, Miles			10.100	850.00	8,585.00

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<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
05 - Motion - review/analyze defendants' oppositions to plaintiffs' MPSJ and Daubert motion and cases and documents cited; legal research and prepare for replies; draft motion to remove improperly filed documents and emails/calls re same										
08-09-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.000	850.00	7,650.00
05 - Motion - review/analyze defendants' oppositions to plaintiffs' MPSJ and Daubert motion and cases and documents cited; legal research and prepare for replies; draft motion to remove improperly filed documents and emails/calls re same										
09-03-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			9.500	850.00	8,075.00
12 - Analyze and review defendants daubert opp and MPSJ opp and cases cited and discovery in connection with preparing replies;										
09-09-2024	Approved		Billable	05 - Motion	Schreiner, Miles			2.000	850.00	1,700.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same;										
09-10-2024	Approved		Billable	05 - Motion	Schreiner, Miles			6.500	850.00	5,525.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same;										
09-11-2024	Approved		Billable	05 - Motion	Schreiner, Miles			2.000	850.00	1,700.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same;										
09-12-2024	Approved		Billable	05 - Motion	Schreiner, Miles			5.000	850.00	4,250.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same;										
09-13-2024	Approved		Billable	05 - Motion	Schreiner, Miles			1.800	850.00	1,530.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same;										
09-16-2024	Approved		Billable	05 - Motion	Schreiner, Miles			6.000	850.00	5,100.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same;										
09-17-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.500	850.00	8,075.00
05 - Motion - review/analyze/edit daubert reply and mediation statement; legal research re same; meetings and calls with co counsel re same										
09-18-2024	Approved		Billable	05 - Motion	Schreiner, Miles			9.500	850.00	8,075.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same; meetings and calls with co counsel re same										
09-19-2024	Approved		Billable	05 - Motion	Schreiner, Miles			12.700	850.00	10,795.00
05 - Motion - review/analyze/edit daubert reply and MSJ reply and mediation statement; legal research re same; meetings and calls with co counsel re same										
09-20-2024	Approved		Billable	03 - Discovery	Schreiner, Miles			6.800	850.00	5,780.00
03 - Discovery - analyze/review annotated discovery exhibits in connection with MPSJ										
09-23-2024	Approved		Billable	09 - Settlement/Mediation	Schreiner, Miles			11.500	850.00	9,775.00
09 - Settlement/Mediation prepare for mediation by reviewing powerpoint, case file, exhibits, briefs; meetings with juan re same										
09-24-2024	Approved		Billable	09 - Settlement/Mediation	Schreiner, Miles			13.400	850.00	11,390.00
09 - Settlement/Mediation attend mediation and prepare for same; post-mediation meeting to discuss case strategy										
09-27-2024	Approved		Billable	12 - Analyze and review	Schreiner, Miles			0.500	850.00	425.00



**Time Entries****Monteverde & Associates PC**

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
12 - Analyze and review orders re motions to file under seal										
09-27-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			5.500	850.00	4,675.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same;										
09-30-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			9.600	850.00	8,160.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same;										
10-01-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			10.900	850.00	9,265.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same;										
10-02-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			9.100	850.00	7,735.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze summary judgment powerpoint and discovery re same; calls with juan re same										
10-03-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			8.000	850.00	6,800.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze summary judgment powerpoint and discovery re same;										
10-04-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			9.800	850.00	8,330.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze summary judgment powerpoint and discovery re same;										
10-07-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			10.500	850.00	8,925.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze summary judgment powerpoint and discovery re same; review redactions for compliance with orders re re-filing sealed documents;										
10-08-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			12.200	850.00	10,370.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze summary judgment powerpoint and discovery re same; review redactions for compliance with orders re re-filing sealed documents;										
10-09-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			9.000	850.00	7,650.00

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze summary judgment powerpoint and discovery re same; review redactions for compliance with orders re re-filing sealed documents; meetings with bejamin and jonathan re same										
10-10-2024	Approved		Billable	05 - Motion	Schreiner, Miles			11.200	850.00	9,520.00
05 - Motion file revised redacted motions for summary judgment and daubert pursuant to court orders; revise redactions as ordered; review motions/exhibits in connection with trial preparation										
10-11-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			7.300	850.00	6,205.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze summary judgment powerpoint and discovery re same;										
10-14-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			6.100	850.00	5,185.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze discovery in connection with preparation for summary judgment hearing;										
10-15-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			3.600	850.00	3,060.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze discovery in connection with preparation for summary judgment hearing;										
10-16-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			9.500	850.00	8,075.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze discovery in connection with preparation for summary judgment hearing;										
10-17-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			5.000	850.00	4,250.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze discovery in connection with preparation for summary judgment hearing;										
10-18-2024	Approved		Billable	06 - Preparation Hearing/Trial	Schreiner, Miles			7.000	850.00	5,950.00
06 - Preparation Hearing/Trial - draft/edit pretrial statement, jury instructions, voir dire questions, verdict form; research re same and review/analyze discovery re same; review/analyze discovery in connection with preparation for summary judgment hearing;										
10-31-2024	Approved		Billable	05 - Motion	Schreiner, Miles			1.200	850.00	1,020.00
05 - Motion - draft stip to continue MSJ hearing and calls/emails re same; calls with juan re case strategy and settlement										
11-15-2024	Approved		Billable	09 - Settlement/Mediation	Schreiner, Miles			4.000	850.00	3,400.00
09 - Settlement/Mediation - review/analyze stipulation of settlement										
11-19-2024	Approved		Billable	11 - Correspondence/Communications	Schreiner, Miles			0.500	850.00	425.00
11 - Correspondence/Communications - call with Beth re plan of allocation; reivew stip and class cert order re same; meeting with juan re same										

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Schreiner, Miles</b>										
11-20-2024	Approved		Billable	09 - Settlement/Mediation	Schreiner, Miles			1.400	850.00	1,190.00
				09 - Settlement/Mediation - review/analyze stipulation of settlement exhibits; emails & call re same						
11-22-2024	Approved		Billable	09 - Settlement/Mediation	Schreiner, Miles			1.500	850.00	1,275.00
				09 - Settlement/Mediation - review/analyze stipulation of settlement exhibits; emails & call re same						
12-11-2024	Approved		Billable	15 - Research	Schreiner, Miles			0.500	850.00	425.00
				15 - Research re final approval in ND Cal and email re same						
12-18-2024	Approved		Billable	05 - Motion	Schreiner, Miles			4.200	850.00	3,570.00
				05 - Motion - review/analyze motion for prelim approval and cases cited and Monteverde decl;						
12-20-2024	Approved		Billable	05 - Motion	Schreiner, Miles			3.900	850.00	3,315.00
				05 - Motion - review/analyze/edit motion for prelim approval and Monteverde decl; research re same						
01-03-2025	Approved		Billable	05 - Motion	Schreiner, Miles			6.000	850.00	5,100.00
				05 - Motion - draft/revise/edit motion for preliminary approval and ancillary documents; emails re same						
01-04-2025	Approved		Billable	05 - Motion	Schreiner, Miles			1.800	850.00	1,530.00
				05 - Motion - draft/revise/edit motion for preliminary approval and ancillary documents; email re same						
01-17-2025	Approved		Billable	05 - Motion	Schreiner, Miles			2.000	850.00	1,700.00
				05 - Motion for preliminary approval - finalize/proof all documents and file						
02-03-2025	Approved		Billable	05 - Motion	Schreiner, Miles			0.500	850.00	425.00
				05 - Motion review/edit reply re motion for preliminary approval; meeting with Juan re same						
02-18-2025	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			1.000	850.00	850.00
				11 - Correspondence/Communications email with co counsel re final approval briefing; research re same						
02-28-2025	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			0.500	850.00	425.00
				11 - Correspondence/Communications calls with Juan re preliminary approval hearing						
03-06-2025	Approved		Billable	11 - Correspondence/ Communications	Schreiner, Miles			0.500	850.00	425.00
				11 - Correspondence/Communications email and call with Juan re revised prelim approval order; review notice re same						
04-28-2025	Approved		Billable	05 - Motion	Schreiner, Miles			0.500	850.00	425.00
				05 - Motion - review/analyze/edit client declarations and meeting with Juan and email re same						
04-29-2025	Approved		Billable	05 - Motion	Schreiner, Miles			7.000	850.00	5,950.00
				05 - Motion - review/analyze/edit motion for fees and research re same; meetings with Juan and email with co counsel re same;						
04-30-2025	Approved		Billable	05 - Motion	Schreiner, Miles			3.000	850.00	2,550.00
				05 - Motion - review/analyze/edit motion for fees and research re same; calls with Juan and email with co counsel re same;						
05-02-2025	Approved		Billable	05 - Motion	Schreiner, Miles			2.000	850.00	1,700.00
				05 - Motion - review/edit/finalize motion for fees and file						

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**Time Entries****Monteverde & Associates PC**

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
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***Aimmune Therapeutics*****Merger****Schreiner, Miles**

**Professional Total 1160.900 986,765.00**

**Steele, Jordan**

09-15-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Steele, Jordan			10.000	475.00	4,750.00
				01 - Case Development, Investigation and review corporate filings						
09-16-2020	Approved		Billable	02 - Pleading	Steele, Jordan			9.000	475.00	4,275.00
				02 - Pleading - Draft pre-close complaint						
09-17-2020	Approved		Billable	02 - Pleading	Steele, Jordan			8.000	475.00	3,800.00
				02 - Pleading - Draft complaint						
09-18-2020	Approved		Billable	02 - Pleading	Steele, Jordan			10.000	475.00	4,750.00
				02 - Pleading - Draft complaint						
09-21-2020	Approved		Billable	11 - Correspondence/Communications	Steele, Jordan			0.700	475.00	332.50
				11 - Correspondence/Communications w/in firm re litigation strategy						
09-22-2020	Approved		Billable	11 - Correspondence/Communications	Steele, Jordan			1.000	475.00	475.00
				11 - Correspondence/Communications w/co-counsel						
09-23-2020	Approved		Billable	02 - Pleading	Steele, Jordan			2.000	475.00	950.00
				02 - Pleading - Incorporate feedback from and edit complaint						
09-24-2020	Approved		Billable	11 - Correspondence/Communications	Steele, Jordan			0.600	475.00	285.00
				11 - Correspondence/Communications w/co-counsel re case						
09-25-2020	Approved		Billable	02 - Pleading	Steele, Jordan			1.500	475.00	712.50
				02 - Pleading - Draft and file complaint						
09-30-2020	Approved		Billable	12 - Analyze and review	Steele, Jordan			0.600	475.00	285.00
				12 - Analyze and review of supplemental disclosures						
10-15-2020	Approved		Billable	11 - Correspondence/Communications	Steele, Jordan			0.500	475.00	237.50
				11 - Correspondence/Communications - Draft and file psira notice						
10-15-2020	Approved		Billable	15 - Research	Steele, Jordan			8.000	475.00	3,800.00
				15 - Research into post-close issues						
10-16-2020	Approved		Billable	11 - Correspondence/Communications	Steele, Jordan			0.700	475.00	332.50
				11 - Correspondence/Communications re service						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Steele, Jordan</b>										
10-16-2020	Approved		Billable	15 - Research	Steele, Jordan			6.000	475.00	2,850.00
				15 - Research into publicly available information						
10-16-2020	Approved		Billable	02 - Pleading	Steele, Jordan			1.500	475.00	712.50
				02 - Pleading - draft amended complaint						
10-18-2020	Approved		Billable	15 - Research	Steele, Jordan			3.000	475.00	1,425.00
				15 - Research into post-close issues re PSLRA						
10-20-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.300	475.00	142.50
				11 - Correspondence/Communications re service of process						
10-21-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.100	475.00	47.50
				11 - Correspondence/Communications re service						
10-23-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Steele, Jordan			4.000	475.00	1,900.00
				01 - Case Development, Investigation and review corporate filings - re SEC Filings for Amended Complaint						
10-23-2020	Approved		Billable	02 - Pleading	Steele, Jordan			0.700	475.00	332.50
				02 - Pleading - Draft stipulation						
11-01-2020	Approved		Billable	15 - Research	Steele, Jordan			2.000	475.00	950.00
				15 - Research into 9th circuit precedent to preempt issues in amended complaint						
11-02-2020	Approved		Billable	02 - Pleading	Steele, Jordan			5.000	475.00	2,375.00
				02 - Pleading - Draft amended complaint						
11-13-2020	Approved		Billable	15 - Research	Steele, Jordan			1.200	475.00	570.00
				15 - Research into PSLRA issues						
11-16-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re stip						
11-18-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re stip						
11-19-2020	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Steele, Jordan			2.000	475.00	950.00
				01 - Case Development, Investigation and review corporate filings						
11-20-2020	Approved		Billable	05 - Motion	Steele, Jordan			5.000	475.00	2,375.00
				05 - Motion - Draft lead brief						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Steele, Jordan</b>										
12-09-2020	Approved		Billable	05 - Motion	Steele, Jordan			5.000	475.00	2,375.00
				05 - Motion - Draft motion for lead plaintiff						
12-09-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re lead						
12-10-2020	Approved		Billable	02 - Pleading	Steele, Jordan			4.500	475.00	2,137.50
				02 - Pleading - draft amended complaint						
12-11-2020	Approved		Billable	05 - Motion	Steele, Jordan			2.200	475.00	1,045.00
				05 - Motion - edits to lead motion						
12-11-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.300	475.00	142.50
				11 - Correspondence/Communications w partner and w david bower re edits						
12-12-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.300	475.00	142.50
				11 - Correspondence/Communications re new client and research						
12-14-2020	Approved		Billable	05 - Motion	Steele, Jordan			3.500	475.00	1,662.50
				05 - Motion - update/filing of lead plaintiff brief with movants						
12-14-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.500	475.00	237.50
				11 - Correspondence/Communications w/partner and firm administrator re filing						
12-15-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re service of lead brief						
12-19-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re consolidation						
12-19-2020	Approved		Billable	12 - Analyze and review	Steele, Jordan			0.300	475.00	142.50
				12 - Analyze and review of lead/response						
12-22-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re filings						
12-26-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re co-lead motion						
12-28-2020	Approved		Billable	05 - Motion	Steele, Jordan			3.000	475.00	1,425.00
				05 - Motion - Edits to motion for lead plaintiff						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Steele, Jordan</b>										
12-28-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.800	475.00	380.00
				11 - Correspondence/Communications between firms re stipulation and cmc report						
12-28-2020	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re service of lead motion						
01-04-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications w/court re stipulation						
01-16-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.300	475.00	142.50
				11 - Correspondence/Communications re re-notice						
01-21-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.500	475.00	237.50
				11 - Correspondence/Communications re amended complaint						
01-26-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.800	475.00	380.00
				11 - Correspondence/Communications w/co-counsel re analyst price targets						
01-26-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			1.000	475.00	475.00
				11 - Correspondence/Communications re issues for co-counsel						
01-26-2021	Approved		Billable	15 - Research	Steele, Jordan			5.000	475.00	2,375.00
				15 - Research re amended recommendation statements and projection disclosures						
02-03-2021	Approved		Billable	02 - Pleading	Steele, Jordan			7.000	475.00	3,325.00
				02 - Pleading - Draft amended complaint						
02-04-2021	Approved		Billable	02 - Pleading	Steele, Jordan			8.000	475.00	3,800.00
				02 - Pleading - Draft amended complaint						
02-06-2021	Approved		Billable	02 - Pleading	Steele, Jordan			7.800	475.00	3,705.00
				02 - Pleading - Draft amended complaint						
02-07-2021	Approved		Billable	15 - Research	Steele, Jordan			2.000	475.00	950.00
				15 - Research re Longitude Capital [Must Add Info to Complaint re New Fund]						
02-08-2021	Approved		Billable	02 - Pleading	Steele, Jordan			4.000	475.00	1,900.00
				02 - Pleading - Draft amended complaint						
02-10-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.300	475.00	142.50
				11 - Correspondence/Communications re scheduling						



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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b>Aimmune Therapeutics</b>										
<b><u>Merger</u></b>										
<b>Steele, Jordan</b>										
02-10-2021	Approved		Billable	12 - Analyze and review	Steele, Jordan			0.200	475.00	95.00
				12 - Analyze and review of stipulation						
02-12-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications re stip						
02-17-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.200	475.00	95.00
				11 - Correspondence/Communications						
02-22-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.100	475.00	47.50
				11 - Correspondence/Communications re CAC						
03-16-2021	Approved		Billable	11 - Correspondence/ Communications	Steele, Jordan			0.300	475.00	142.50
				11 - Correspondence/Communications and review of stipulation to stay proceedings in CA						
<b>Professional Total</b>								<b>143.300</b>		<b>68,067.50</b>

**Vanderhyden, Benjamin**

09-07-2023	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Vanderhyden, Benjamin			5.000	350.00	1,750.00
				01 - Case Development, Investigation and review corporate filings - reviewed amended complaint, motion to dismiss, and SEC filings related to the merger						
09-08-2023	Approved		Billable	12 - Analyze and review	Vanderhyden, Benjamin			6.000	350.00	2,100.00
				12 - Analyze and review amended complaint, motions to dismiss, and oppositions to MTD						
09-14-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.100	350.00	2,485.00
				03 - Discovery - reviewed and analyzed discovery production; drafted a timeline of events						
09-15-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			6.100	350.00	2,135.00
				03 - Discovery - reviewed/analyzed discovery production						
09-18-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			5.800	350.00	2,030.00
				03 - Discovery - reviewed and analyzed discovery production						
09-19-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.700	350.00	1,645.00
				03 - Discovery reviewed and analyzed discovery production; included relevant events in draft timeline						
09-20-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.300	350.00	1,505.00
				03 - Discovery reviewed/analyzed and annotated discovery documents; added relevant information to timeline						
09-21-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.100	350.00	1,085.00
				03 - Discovery - reviewed and analyzed discovery production						



**Time Entries****Monteverde & Associates PC**

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 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><u>Vanderhyden, Benjamin</u></b>										
09-22-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.600	350.00	2,660.00
				03 - Discovery - reviewed/analyzed discovery production						
09-25-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.800	350.00	3,080.00
				03 - Discovery reviewed/analyzed discovery production; included relevant documents/information into draft timeline						
09-28-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			6.200	350.00	2,170.00
				03 - Discovery - reviewed and analyzed discovery production						
09-29-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.500	350.00	2,975.00
				03 - Discovery - reviewed and analyzed discovery production						
10-02-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.300	350.00	2,555.00
				03 - Discovery - reviewed/analyzed Nestle discovery production materials						
10-03-2023	Approved		Billable	01 - Case Development, Investigation and review corporate filings	Vanderhyden, Benjamin			1.200	350.00	420.00
				01 - Case Development, Investigation and review corporate filings - researched background of potential director deponents and created a biography for each						
10-04-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.500	350.00	2,975.00
				03 - Discovery - researched AIMT directors' previous experiences with pharmaceutical treatments; updated draft timeline for Lazard production						
10-05-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.100	350.00	2,835.00
				03 - Discovery - reviewed/analyzed Nestle discovery production, drafted timeline based on Nestle production; researched AIMT director for potential prior relationships						
10-06-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			5.800	350.00	2,030.00
				03 - Discovery - reviewed/analyzed Nestle discovery production; drafted timeline of events based on discovery						
10-09-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.600	350.00	1,260.00
				03 - Discovery - reviewed/analyzed Lazard discovery production						
10-10-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.900	350.00	2,765.00
				03 - Discovery - reviewed/analyzed Lazard discovery production; drafted timeline of important edits made to BoD presentation						
10-11-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.900	350.00	3,115.00
				03 - Discovery - reviewed/analyzed Lazard discovery production; printed and annotated discovery documents; compared different versions of banker deck for BoD presentation						
10-12-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			5.300	350.00	1,855.00
				03 - Discovery - reviewed/analyzed Lazard discovery production; created a folder for all discovery documents used in timeline						
10-13-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.100	350.00	1,435.00
				03 - Discovery - reviewed/analyzed Lazard discovery production; created folder for all Lazard BoD presentations						
10-16-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.400	350.00	2,590.00
				03 - Discovery - reviewed/analyzed Lazard discovery production; printed and annotated relevant banker presentations						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><u>Vanderhyden, Benjamin</u></b>										
10-17-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.400	350.00	1,190.00
				03 - Discovery annotated/analyzed Lazard production documents						
10-18-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.100	350.00	2,485.00
				03 - Discovery reviewed/analyzed Nestle production documents; drafted a timeline of important events						
10-19-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.100	350.00	2,835.00
				03 - Discovery reviewed/analyzed JP Morgan discovery production						
10-20-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			6.800	350.00	2,380.00
				03 - Discovery reviewed/analyzed Bank of America discovery production						
10-23-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.600	350.00	2,660.00
				03 - Discovery analyzed/reviewed Bank of America discovery production documents						
10-24-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.400	350.00	2,940.00
				03 - Discovery reviewed/analyzed Bank of America discovery production documents						
10-25-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.100	350.00	2,835.00
				03 - Discovery reviewed/analyzed Bank of America discovery production documents						
10-26-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			8.500	350.00	2,975.00
				03 - Discovery reviewed/analyzed Bank of America discovery production documents						
10-27-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			7.800	350.00	2,730.00
				03 - Discovery reviewed/analyzed Bank of America discovery production documents; began drafting a timeline of relevant documents from Bank of America production						
10-30-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.400	350.00	490.00
				03 - Discovery - drafted timeline of Bank of America discovery production documents						
10-31-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.300	350.00	1,155.00
				03 - Discovery - reviewed/analyzed discovery documents; organized discovery documents into folders with labels and organized documents according to future deponents						
11-02-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.200	350.00	770.00
				03 - Discovery - reviewed/analyzed discovery documents; organized discovery documents into folders						
11-03-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			6.700	350.00	2,345.00
				03 - Discovery - printed/organized discovery documents for review; created folder for all discovery documents pulled from timeline						
11-03-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			2.800	350.00	980.00
				04 - Deposition - drafted an outline for client preparation in anticipation of their deposition						
11-06-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.100	350.00	1,085.00
				03 - Discovery - reviewed/organized discovery production documents						
11-07-2023	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			4.500	350.00	1,575.00

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b>Vanderhyden, Benjamin</b>										
				11 - Correspondence/Communications - reviewed history of the case in order to create a client outline to prepare lead plaintiffs for deposition						
11-08-2023	Approved		Billable	11 - Correspondence/Communications	Vanderhyden, Benjamin			2.800	350.00	980.00
				11 - Correspondence/Communications - assembled binder of relevant documents for client in preparation of deposition; edited outline of case to prepare client for deposition; reviewed prior deposition transcripts in order to create list of questions to help prepare client for deposition						
11-08-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.100	350.00	1,085.00
				03 - Discovery - reviewed key documents; organized discovery files to incorporate additional key documents						
11-09-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.700	350.00	945.00
				03 - Discovery - reviewed discovery documents; added new production items to key documents folder						
11-10-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.800	350.00	630.00
				03 - Discovery - reviewed discovery documents; added new documents to key documents files						
11-13-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.800	350.00	630.00
				03 - Discovery - updated timeline folder to correspond with latest additions to timeline						
11-14-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			0.900	350.00	315.00
				03 - Discovery - organized discovery documents; converted discovery into PDF format						
11-14-2023	Approved		Billable	02 - Pleading	Vanderhyden, Benjamin			2.600	350.00	910.00
				02 - Pleading - drafted subpoena to third party company						
11-15-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			3.100	350.00	1,085.00
				04 - Deposition - assist to prep clients Svitaks for depos.						
11-15-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			2.400	350.00	840.00
				04 - Deposition - reviewed deposition outline for upcoming director deposition; provided additional documents where needed for deposition						
11-15-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.600	350.00	560.00
				03 - Discovery - organized discovery documents; reviewed/analyzed discovery documents						
11-17-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			6.500	350.00	2,275.00
				04 - Deposition - prepared for deposition; attended deposition						
11-20-2023	Approved		Billable	06 - Preparation Hearing/Trial	Vanderhyden, Benjamin			1.100	350.00	385.00
				06 - Preparation Hearing/Trial - organized/annotated deposition exhibits to review for further depositions						
11-21-2023	Approved		Billable	06 - Preparation Hearing/Trial	Vanderhyden, Benjamin			1.600	350.00	560.00
				06 - Preparation Hearing/Trial - printed exhibits for deposition of Mark McDade to assemble in a binder to be shipped						
11-27-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			0.800	350.00	280.00
				04 - Deposition - reviewed and organized notes from the deposition of Patrick Enright						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><u>Vanderhyden, Benjamin</u></b>										
11-27-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			0.400	350.00	140.00
				03 - Discovery - organized/reviewed documents to be used as potential exhibits in the deposition of Mark McDade						
11-28-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.100	350.00	735.00
				03 - Discovery - reviewed defendant responses to interrogatories; printed documents identified in responses for review						
11-28-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			3.800	350.00	1,330.00
				04 - Deposition - reviewed exhibits and notes in preparation for deposition of Mark McDade; attended deposition of Mark McDade and took notes						
11-29-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			1.100	350.00	385.00
				04 - Deposition - reviewed/organized notes taken during deposition of Mark McDade						
12-01-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.700	350.00	1,645.00
				03 - Discovery - reviewed/analyzed discovery documents identified in defendant's responses to interrogatories						
12-04-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.000	350.00	700.00
				03 - Discovery - reviewed/analyzed discovery documents identified in Defendants' responses to requests for production of documents						
12-04-2023	Approved		Billable	15 - Research	Vanderhyden, Benjamin			5.500	350.00	1,925.00
				15 - Research - researched whether spousal privilege can be raised in federal civil cases						
12-05-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.100	350.00	735.00
				03 - Discovery - reviewed/analyzed discovery documents identified in Defendants' responses to requests for production of documents						
12-05-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			4.100	350.00	1,435.00
				04 - Deposition - attended deposition of Cecilia Pemberton; took notes						
12-06-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.600	350.00	560.00
				03 - Discovery - reviewed/analyzed discovery documents from Nestle production						
12-06-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.900	350.00	665.00
				03 - Discovery - organized/reviewed documents identified in Defendants' responses to request for production						
12-06-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.300	350.00	805.00
				03 - Discovery - researched/analyzed documents related to Palforzia on FDA website; resarched/reviewed documents related to clinical trial data with respect to Palforzia						
12-06-2023	Approved		Billable	06 - Preparation Hearing/ Trial	Vanderhyden, Benjamin			1.600	350.00	560.00
				06 - Preparation Hearing/Trial - prepped clients Bruce and Barbara Svitak for upcoming depositions						
12-06-2023	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			0.500	350.00	175.00
				11 - Correspondence/Communications - discussed research on spousal privilege in federal civil cases						
12-06-2023	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			0.400	350.00	140.00
				11 - Correspondence/Communications - discussed deposition of Barbara Svitak; reviewed notes regarding the same						

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><i>Vanderhyden, Benjamin</i></b>										
12-07-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			4.100	350.00	1,435.00
				04 - Deposition - attended deposition of Bruce Svitak; took notes						
12-07-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.700	350.00	945.00
				03 - Discovery - reviewed/analyzed FDA documents related to Palforzia; reviewed discovery documents related to clinical trial data of Palforzia						
12-08-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			2.200	350.00	770.00
				04 - Deposition - attended deposition of Barbara Svitak; took notes; discussed deposition with client and associates						
12-11-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.500	350.00	875.00
				03 - Discovery - researched FDA documents related to Palforzia						
12-11-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.700	350.00	595.00
				03 - Discovery - reviewed exhibits to be used in deposition						
12-12-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			6.800	350.00	2,380.00
				04 - Deposition - attended deposition of Jayson Dallas; took notes						
12-14-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			5.700	350.00	1,995.00
				04 - Deposition - attended deposition of Eric Bjerkholt; took notes						
12-18-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.100	350.00	735.00
				03 - Discovery - downloaded/organized exhibits and printed for use in deposition						
12-19-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			4.200	350.00	1,470.00
				04 - Deposition - attended deposition of Martin Hendrix; took notes						
12-20-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			6.800	350.00	2,380.00
				04 - Deposition - attended deposition of Andrew Oxtoby; took notes						
12-21-2023	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			4.600	350.00	1,610.00
				04 - Deposition - attended deposition of Gregory Behar; took notes						
12-22-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.400	350.00	840.00
				03 - Discovery - printed and reviewed latest deposition exhibits						
12-28-2023	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.300	350.00	1,505.00
				03 - Discovery - reviewed production of text messages						
01-02-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.000	350.00	350.00
				03 - Discovery - organized deposition transcripts; corresponded with eLitigate Esquire						
01-03-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.100	350.00	1,085.00
				03 - Discovery - reviewed deposition transcripts; drafted summaries of for Bjerkholt, Dallas, Oxtoby, Behar, and Hendrix depositions						
01-05-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			1.700	350.00	595.00
				04 - Deposition - drafted notices of depositions for Thiessen, Kinston, and Akhawat						
01-09-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			2.600	350.00	910.00

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><i>Vanderhyden, Benjamin</i></b>										
04 - Deposition - reviewed transcripts										
01-11-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			3.500	350.00	1,225.00
04 - Deposition - prepared for and attended deposition of Kate Falberg										
01-17-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.700	350.00	945.00
03 - Discovery - organized and reviewed latest Bank of America production										
01-18-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.100	350.00	1,435.00
03 - Discovery - reviewed/analyzed latest Bank of America production										
01-19-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			3.100	350.00	1,085.00
04 - Deposition - attended deposition of Stacey Seltzer										
01-19-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.300	350.00	1,505.00
03 - Discovery - reviewed/analyzed latest Bank of America production										
01-22-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			6.800	350.00	2,380.00
03 - Discovery - reviewed/organized documents identified for upcoming deposition; reviewed/organized projections based on certain exhibits										
01-22-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			1.500	350.00	525.00
04 - Deposition - prepared/organized exhibits for upcoming deposition of Bank of America witness										
01-23-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.700	350.00	1,645.00
03 - Discovery - reviewed/organized/downloaded banker decks and projections for J.P. Morgan and Bank of America production										
01-24-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			3.600	350.00	1,260.00
04 - Deposition - attended deposition of Brian Greenblatt										
01-24-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.400	350.00	840.00
03 - Discovery - reviewed/organized Lazard projections										
01-25-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			2.100	350.00	735.00
04 - Deposition - attended deposition of William Thiessen										
01-25-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			2.300	350.00	805.00
13 - Experts - researched potential candidates to contact to use as experts in case										
01-25-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.600	350.00	560.00
03 - Discovery - organized Lazard projections										
01-26-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			2.600	350.00	910.00
13 - Experts - contacted potential leads for experts										
01-29-2024	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			5.100	350.00	1,785.00
11 - Correspondence/Communications - assembled envelopes containing surveys to be sent to former Aimmune shareholders										
01-30-2024	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			6.500	350.00	2,275.00

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Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><u>Vanderhyden, Benjamin</u></b>										
11 - Correspondence/Communications - assembled envelopes containing surveys to be sent to former Aimmune shareholders										
01-31-2024	Approved		Billable	11 - Correspondence/Communications	Vanderhyden, Benjamin			5.200	350.00	1,820.00
11 - Correspondence/Communications - assembled envelopes containing surveys to be sent to former Aimmune shareholders										
02-02-2024	Approved		Billable	11 - Correspondence/Communications	Vanderhyden, Benjamin			3.300	350.00	1,155.00
11 - Correspondence/Communications - assembled envelopes containing surveys to be sent to former Aimmune shareholders										
02-15-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			0.600	350.00	210.00
03 - Discovery - organized latest deposition transcripts and exhibits										
03-04-2024	Approved		Billable	11 - Correspondence/Communications	Vanderhyden, Benjamin			1.100	350.00	385.00
11 - Correspondence/Communications - prepared declaration of Bruce Svitak and verifications to ROGS										
03-11-2024	Approved		Billable	11 - Correspondence/Communications	Vanderhyden, Benjamin			0.500	350.00	175.00
11 - Correspondence/Communications - drafted verifications and mailed to clients										
03-12-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			0.700	350.00	245.00
03 - Discovery - organized exhibits and transcripts										
03-18-2024	Approved		Billable	12 - Analyze and review	Vanderhyden, Benjamin			2.100	350.00	735.00
12 - Analyze and review - reviewed/analyzed Aimmune's responses to most recent interrogatories										
03-19-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			0.900	350.00	315.00
03 - Discovery - organized plaintiffs' and defendants' discovery requests and responses into binders for review and analysis										
03-22-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.100	350.00	1,085.00
03 - Discovery - identified, organized and reviewed/analyzed all documents identified in Aimmune's response to plaintiffs' second set of interrogatories and first requests for admission										
03-22-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.900	350.00	665.00
03 - Discovery - reviewed/analyzed defendant Aimmune's responses and objections to plaintiffs' second set of interrogatories and first set of requests for admission										
03-25-2024	Approved		Billable	11 - Correspondence/Communications	Vanderhyden, Benjamin			1.400	350.00	490.00
11 - Correspondence/Communications - attended conference call regarding plaintiffs' and defendants' responses to discovery demands										
03-25-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			0.500	350.00	175.00
03 - Discovery - reviewed updated responses to requests for admission										
03-25-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			0.500	350.00	175.00
03 - Discovery - organized discovery documents; pulled relevant documents from database										
04-15-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			2.800	350.00	980.00



**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><i>Vanderhyden, Benjamin</i></b>										
13 - Experts - reviewed Aimmune's expert report										
04-15-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.600	350.00	1,610.00
03 - Discovery - pulled all discovery documents cited in Aimmune's expert report										
04-16-2024	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			1.500	350.00	525.00
11 - Correspondence/Communications - attended conference call with co-counsel and expert in preparation for expert's deposition										
04-16-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			2.100	350.00	735.00
13 - Experts - reviewed Aimmune's and plaintiff's experts' reports										
04-16-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.500	350.00	875.00
03 - Discovery - reviewed expert documents cited in Aimmune's expert report										
04-16-2024	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			1.000	350.00	350.00
11 - Correspondence/Communications - drafted Notice of Deposition of Paul Gompers										
04-17-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.100	350.00	735.00
03 - Discovery - organized/reviewed discovery documents related to expert report										
04-18-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			3.400	350.00	1,190.00
13 - Experts - reviewed documents produced by Aimmune relating to their expert's report										
04-19-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			2.400	350.00	840.00
13 - Experts - reviewed defendant's production of additional documents relied upon by their expert in creating their report										
04-22-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			1.700	350.00	595.00
13 - Experts - attended expert preparation conference										
04-22-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.600	350.00	560.00
03 - Discovery - pulled excerpts from deposition transcripts for expert Jeffers										
04-23-2024	Approved		Billable	04 - Deposition	Vanderhyden, Benjamin			7.500	350.00	2,625.00
04 - Deposition - attended deposition of expert Jeffers										
05-02-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			2.100	350.00	735.00
13 - Experts - reviewed draft outline for deposition of Aimmune's expert, Paul Gompers										
05-02-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.500	350.00	1,575.00
03 - Discovery - reviewed/organized proposed exhibits to be used in connection with the deposition of Aimmune's expert, Paul Gompers										
05-03-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.300	350.00	455.00
03 - Discovery - organized/reviewed proposed exhibits to be used in the deposition of Aimmune's expert										
05-06-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			4.400	350.00	1,540.00
03 - Discovery - organized and reviewed discovery documents to be used in connection with deposition of Aimmune's expert										
05-07-2024	Approved		Billable	13 - Experts	Vanderhyden, Benjamin			4.500	350.00	1,575.00

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**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><i>Vanderhyden, Benjamin</i></b>										
13 - Experts - attended deposition of Aimmune's expert, Paul Gompers										
07-08-2024	Approved		Billable	15 - Research	Vanderhyden, Benjamin			1.800	350.00	630.00
15 - Research - reviewed and analyzed case law regarding Daubert motions and expert testimony										
07-09-2024	Approved		Billable	15 - Research	Vanderhyden, Benjamin			6.700	350.00	2,345.00
15 - Research - reviewed and analyzed case law and pleadings related to Daubert motions to exclude expert testimony										
07-09-2024	Approved		Billable	05 - Motion	Vanderhyden, Benjamin			2.600	350.00	910.00
05 - Motion - drafted opposition to Defendants' motion to exclude Jeffers's expert report and testimony										
07-10-2024	Approved		Billable	15 - Research	Vanderhyden, Benjamin			6.700	350.00	2,345.00
15 - Research - reviewed and analyzed case law and briefings related to Daubert motions to exclude expert testimony										
07-10-2024	Approved		Billable	05 - Motion	Vanderhyden, Benjamin			1.400	350.00	490.00
05 - Motion - drafted opposition to Defendants' motion to exclude Mr. Jeffers's expert opinions										
07-11-2024	Approved		Billable	05 - Motion	Vanderhyden, Benjamin			4.400	350.00	1,540.00
05 - Motion - drafted opposition to Defendants' motion to exclude Mr. Jeffers expert opinions										
07-12-2024	Approved		Billable	05 - Motion	Vanderhyden, Benjamin			4.300	350.00	1,505.00
05 - Motion - drafted opposition to Defendant's motion to exclude expert opinion of Jeffers										
07-12-2024	Approved		Billable	15 - Research	Vanderhyden, Benjamin			3.100	350.00	1,085.00
15 - Research - researched Daubert motion briefings and prior rulings on Daubert motions from Judge Chesney										
07-15-2024	Approved		Billable	15 - Research	Vanderhyden, Benjamin			8.400	350.00	2,940.00
15 - Research - researched and analyzed cases in which Judge Chesney ruled on motions to exclude expert opinions or Daubert motions; created a document with such cases and the outcome of each motion										
07-29-2024	Approved		Billable	05 - Motion	Vanderhyden, Benjamin			1.800	350.00	630.00
05 - Motion - reviewed response in opposition to Defendant's motion to limit Jeffers' expert testimony										
09-17-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.000	350.00	700.00
03 - Discovery - reviewed discovery documents related to the Total Revenue forecast referenced in the Jeffers expert report										
09-27-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			6.300	350.00	2,205.00
03 - Discovery - reviewed administrative order regarding Daubert motion for Gompers and Partial Summary Judgment; redacted deposition transcripts, exhibits and reports for filing										
09-30-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.800	350.00	1,330.00
03 - Discovery - organized depositions and exhibits; reviewed orders from the Court regarding redactions of certain motions, exhibits, and depositions and made those redactions										
10-02-2024	Approved		Billable	11 - Correspondence/ Communications	Vanderhyden, Benjamin			1.800	350.00	630.00
11 - Correspondence/Communications - reviewed PowerPoint for the Motion for Summary Judgment hearing; made edits										
10-02-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			3.200	350.00	1,120.00

**Time Entries****Monteverde & Associates PC**

Professional = Multiple (Inactive Included)  
 Group By Professional Group  
 Client - Matter = Merger (Active Only)  
 Task Code = All  
 View = Original  
 From 01-01-2017 To 05-02-2025

Date	Status	Approval	BillableType	Task	Professional	Start	Stop	Duration	Rate	Amount
<b><i>Aimmune Therapeutics</i></b>										
<b><u>Merger</u></b>										
<b><u>Vanderhyden, Benjamin</u></b>										
				03 - Discovery - reviewed docket entries for attachments corresponding to Court orders regarding the redaction of certain exhibits, motions, and deposition transcripts; made corrected redactions						
10-03-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			1.100	350.00	385.00
				03 - Discovery - reviewed all redactions pursuant to court order; organized redactions into folders; circulated redacted documents						
10-09-2024	Approved		Billable	05 - Motion	Vanderhyden, Benjamin			2.100	350.00	735.00
				05 - Motion - reviewed and finalized redactions in accordance with Court orders with respect to Plaintiffs' Daubert Motion, Plaintiffs' Opposition to Defendants' Daubert Motion, Plaintiffs' Motion for Partial Summary Judgment, and Plaintiffs' Opposition to Defendants' Motion for Summary Judgment						
10-10-2024	Approved		Billable	05 - Motion	Vanderhyden, Benjamin			1.500	350.00	525.00
				05 - Motion - reviewed and finalized redactions in accordance with Court orders with respect to Plaintiffs' Daubert Motion, Plaintiffs' Opposition to Defendants' Daubert Motion, Plaintiffs' Motion for Partial Summary Judgment, and Plaintiffs' Opposition to Defendants' Motion for Summary Judgment						
10-29-2024	Approved		Billable	03 - Discovery	Vanderhyden, Benjamin			2.800	350.00	980.00
				03 - Discovery - organized discovery/exhibits; organized and reviewed deposition transcripts; reviewed privilege log, circulated with co-counsel						
10-30-2024	Approved		Billable	09 - Settlement/Mediation	Vanderhyden, Benjamin			1.500	350.00	525.00
				09 - Settlement/Mediation - reviewed mediation recommendation statement; reviewed argument to be made in connection with upcoming hearing on motion for summary judgment						
<b>Professional Total</b>								<b>552.500</b>		<b>193,375.00</b>
<b>Matter Total</b>								<b>3846.900</b>		<b>2,907,215.00</b>
<b>Client Total</b>								<b>3846.900</b>		<b>2,907,215.00</b>
<b>Grand Total</b>								<b>3846.900</b>		<b>2,907,215.00</b>

# EXHIBIT 8

Juan E. Monteverde (admitted *pro hac vice*, NY Reg. No. 4467882)

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*Counsel for Co-Lead Plaintiffs and  
Class Counsel*

[Additional Counsel on Signature Page]

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

Master File No. 3:20-CV-06733-MMC

IN RE AIMMUNE THERAPEUTICS, INC.  
SECURITIES LITIGATION

**DECLARATION OF MICHAEL J.  
PALESTINA IN SUPPORT OF CO-LEAD  
PLAINTIFFS' MOTION FOR AN AWARD  
OF ATTORNEYS' FEES AND EXPENSES  
AND AWARDS TO CO-LEAD PLAINTIFFS  
PURSUANT TO 15 U.S.C. §78u-4(a)(4)**

Hearing: July 18, 2025

Time: 9:00 a.m.

Court: Courtroom 7, 19th Floor

Judge: Hon. Maxine M. Chesney

I, Michael J. Palestina, declare:

1. I am an attorney duly licensed to practice law in the State of Louisiana and am admitted to practice *pro hac vice* before this Court. I am a partner of Kahn Swick & Foti, LLC, Co-Lead Counsel for Co-Lead Plaintiffs Cecelia Pemberton, Bruce Svitak, and Barbara Svitak in the Action, and Court-appointed Class Counsel.

2. I submit this declaration in support of Co-Lead Plaintiffs' Motion for an Award of Attorneys' Fees and Expenses and Awards to Co-Lead Plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4).

3. I have personal knowledge of the facts set forth herein and if called as a witness, could and would testify competently to these facts under oath.

4. Class Counsel's compensation for services rendered in this Litigation was wholly contingent on the success of the Action. Class Counsel are seeking attorneys' fees of one-third of the Settlement Amount, or \$9,166,667. These attorneys' fees have not been paid from any source to Class Counsel and have not been the subject of any prior request, or prior award, in any litigation or other proceeding.

5. The chart below summarizes the work performed by my firm in connection with prosecution of this Action (and the related books and records action filed by Class Representative Pemberton). My firm has accrued 3,509.1 professional hours, representing a total lodestar of \$2,840,822.50, which dates from inception to present day.

ATTORNEY	HOURS	RATE	LODESTAR
Lewis Kahn (P)	1.8	\$1,250	\$2,250.00
Michael Palestina (P)	944.2	\$1,000	\$944,200.00
Gina Palermo (A)	525.7	\$750	\$394,275.00
Rhosean Scott (A)	1,746.2	\$750	\$1,309,650.00
Alexander Burns (A)	0.9	\$750	\$675.00
Brian Mears (A)	244.0	\$700	\$170,800.00
Nowal Jamhour (A)	15.6	\$550	\$8,580.00
Abbey Barton (SA)	3.5	\$350	\$1,225.00
Ashley Errington (ST)	6.6	\$400	\$2,640.00
Debbie Chase (ST)	1.0	\$350	\$350.00
Bronwyn Gibson (ST)	11.9	\$325	\$3,867.50

Patrick Abercrombie (ST)	7.7	\$300	\$2,310.00
<b>TOTALS</b>	<b>3,509.1</b>		<b>\$2,840,822.50</b>

P – Partner; A - Associate; SA- Staff Attorney; ST – Support Staff

6. My firm’s billing records are attached hereto as Exhibit A. The lodestar was calculated based on my firm’s regular hourly billing rates and was prepared from time records regularly prepared and maintained by my firm. The time reflected was reasonably and necessarily expended.

7. The hourly rates for my firm are the usual and customary hourly rates charged for our services in similar litigation. My firm determined the hourly rates after careful consideration, including a survey of the prevailing market rates charged for mergers and acquisitions and securities litigation. These rates are also in line with hourly rates accepted in the Northern District of California. *Fleming v. Impax Laby’s Inc.*, 2022 U.S. Dist. LEXIS 125595, at \*28 (N.D. Cal. July 15, 2022) (approving hourly rates of \$760 to \$1,325 for partners, \$895 to \$1,150 for counsel, and \$175 to \$520 for associates, and noting that such “billing rates [are] in line with prevailing rates in this district for personnel of comparable experience, skill, and reputation”); *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, 2020 U.S. Dist. LEXIS 129939, at \*102 (N.D. Cal. July 22, 2020) (approving hourly rates of \$490 to \$975 for partners and from \$310 to \$800 for non-partners); *Hefler v. Wells Fargo & Co.*, 2018 U.S. Dist. LEXIS 213045, at \*39 (N.D. Cal. Dec. 18, 2018) (finding rates ranging from \$650 to \$1,250 for partners or senior counsel and from \$400 to \$650 for associates as reasonable); *see also Khoja v. Orexigen Therapeutics*, No. 15cv00540-JLS-AGS, 2021 U.S. Dist. LEXIS 230105, at \*31 and ECF No. 149-5, PageID.3786 (S.D. Cal. Nov. 30, 2021) (holding the lodestar cross-check (which included KSF partner rates of \$925-\$1,100) supported a 33% fee).

8. Additionally, Class Counsel are seeking reimbursement of certain expenses incurred in connection with the Action (and the related books and records action filed by Class Representative Pemberton). A summary of the expenses incurred by my firm for which we are seeking reimbursement is detailed below:

CATEGORY	AMOUNT
Expert Fees	\$98,441.00
Deposition Transcripts/Expenses	\$25,076.20
Mediation Fees	\$20,228.75
eDiscovery Platform	\$8,489.66
Copies and Delivery Fees	\$3,987.09
Filing Fees and Court Costs	\$2,367.50
<b>TOTAL</b>	<b>\$158,590.20</b>

9. The expenses summarized above are supported by the books and records of my firm, which are prepared from expense vouchers, check records, or other documents, and represent an accurate record of the expenses incurred in connection with this Action, and were reasonably necessary for the prosecution of this Action.

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

Executed on May 1, 2025

/s/ Michael J. Palestina

Michael J. Palestina

## Exhibit A

Bill Date	Staff	Duration	Case	Code	Description
09/14/2020	Brian Mears	3.5	Aimmune Therapeutics	COMP	Review Tender Offer statement; analysts reports, other filings
09/14/2020	Brian Mears	2	Aimmune Therapeutics	LITI	Complete Review of Schedule 14-d/TO Statement, analysts report; email MJP
09/14/2020	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Corr re: TO
09/15/2020	Michael Palestina	2.1	Aimmune Therapeutics	LITI	Review TO statementt
09/16/2020	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Call client; discussion w/ Juan
09/17/2020	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Review draft complaint; corr re: same
09/21/2020	Patrick Abercrombie	0.4	Aimmune Therapeutics	LITI	Calendar date to check for published PSLRA Notice and date Aimmune's tender offer closes.
09/21/2020	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corr to client
09/22/2020	Nowal Jamhour	0.9	Aimmune Therapeutics	LITI	Review + distribute case alert/update
09/24/2020	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Review & decide; call with client
09/25/2020	Brian Mears	6	Aimmune Therapeutics	LITI	Draft 220 Demand
09/25/2020	Michael Palestina	3.1	Aimmune Therapeutics	LITI	Edit 220; draft ancillary docs
09/28/2020	Brian Mears	1	Aimmune Therapeutics	LITI	Nits edit to 220 demand
09/28/2020	Michael Palestina	0.7	Aimmune Therapeutics	LITI	Finalize & send 220 demand
10/02/2020	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corr to Brien & client re: 220 complaint
10/03/2020	Brian Mears	1.8	Aimmune Therapeutics	COMP	Draft 220 Complaint
10/05/2020	Brian Mears	4	Aimmune Therapeutics	LITI	Complete Draft 220 Complaint; Demand v Disclosure Chart; Send to MJP
10/05/2020	Brian Mears	1.3	Aimmune Therapeutics	LITI	Review Exhibits filed w Schedule 13E3; email MJP
10/05/2020	Michael Palestina	1.3	Aimmune Therapeutics	LITI	Edit & circulate 220 complaint
10/06/2020	Brian Mears	2.2	Aimmune Therapeutics	LITI	Edits to 220 Response; Research for citations
10/06/2020	Brian Mears	0.5	Aimmune Therapeutics	LITI	Update disclosure chart - send to MJP
10/06/2020	Brian Mears	1	Aimmune Therapeutics	LITI	Edits / nits edit to 220 Complaint
10/06/2020	Michael Palestina	1.8	Aimmune Therapeutics	COMP	Edit & send reply; edit complaint
10/07/2020	Patrick Abercrombie	0.2	Aimmune Therapeutics	LITI	Receive and review Response to Pemberton Demand.
10/07/2020	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Finalize & file
10/08/2020	Patrick Abercrombie	0.3	Aimmune Therapeutics	LITI	Receive and review 220 Complaint, Motion for Expediated Procedures, and Verification of Permberon.
10/15/2020	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Call re: strategy
10/16/2020	Nowal Jamhour	4.4	Aimmune Therapeutics	LITI	PSLRA research (incl. background)
10/18/2020	Nowal Jamhour	5.3	Aimmune Therapeutics	MLP	PSLRA deadline research
10/19/2020	Nowal Jamhour	3	Aimmune Therapeutics	LITI	PSLRA research, discuss w/ BM
10/20/2020	Brian Mears	0.5	Aimmune Therapeutics	LITI	Research re MLP deadline
10/20/2020	Patrick Abercrombie	0.2	Aimmune Therapeutics	LITI	Calendar deadline to file Motion for Lead Plaintiff.
10/20/2020	Nowal Jamhour	0.8	Aimmune Therapeutics	LITI	Calendaring Aimmune MLP deadline + reminder w/PA
10/20/2020	Nowal Jamhour	0.5	Aimmune Therapeutics	LITI	Update monitor; search/review/distribute SEC filings re TO expiration and close
10/22/2020	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call w. D counsel
10/23/2020	Nowal Jamhour	0.2	Aimmune Therapeutics	LITI	Update monitor; search/review/distribute SEC filings re termination of listing
10/29/2020	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Ok stip; list of docs to D counsel
11/11/2020	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Review confi & proposed resolution
11/12/2020	Michael Palestina	1	Aimmune Therapeutics	LITI	Review & edit confi; respond to Ds
11/16/2020	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corr w/ D counsel
11/17/2020	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Call re: confi & prep for same
11/19/2020	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call w. client



Bill Date	Staff	Duration	Case	Code	Description
11/20/2020	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Final review & sign confi
11/24/2020	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corr re: stip
12/08/2020	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Review corr re: minutes; corr to D counsel
12/09/2020	Michael Palestina	1.6	Aimmune Therapeutics	LITI	Disc re: lead filing; call w. client; draft cert
12/10/2020	Brian Mears	6	Aimmune Therapeutics	LITI	MLP drafts
12/10/2020	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Edits & docs to clients; call Cecilia
12/11/2020	Brian Mears	6	Aimmune Therapeutics	LITI	Review 220 Production / Timeline
12/11/2020	Michael Palestina	1.4	Aimmune Therapeutics	MLP	MLP papers
12/12/2020	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call re: MLP
12/14/2020	Brian Mears	0.5	Aimmune Therapeutics	LITI	Edits to filing docs
12/14/2020	Patrick Abercrombie	0.3	Aimmune Therapeutics	LITI	Receive and review scheduling order regarding Motion for Lead Plaintiff and calendar dates for Motion for Lead Plaintiff briefing schedule.
12/14/2020	Michael Palestina	2.1	Aimmune Therapeutics	COMP	Finalize & file
12/14/2020	Ashley Errington	3.8	Aimmune Therapeutics	MLP	Preparing Notice of Appearance, Certificate of Counsel, Certificate of Interested Parties, Motion for Lead Plaintiff, Exhibits, and Proposed Order; filing of same.
12/14/2020	Ashley Errington	0.7	Aimmune Therapeutics	MLP	Review local rules and standing orders for special instructions on courtesy copies.
12/14/2020	Ashley Errington	0.5	Aimmune Therapeutics	MLP	Draft email to Mr. Palestina re: necessary changes to papers prior to filing.
12/14/2020	Ashley Errington	0.3	Aimmune Therapeutics	MLP	Draft email to forward proposed order to Judge.
12/14/2020	Ashley Errington	1	Aimmune Therapeutics	MLP	Draft correspondence to Judge re: Chambers copy.
12/15/2020	Brian Mears	0.5	Aimmune Therapeutics	LITI	MJP PHV
12/15/2020	Patrick Abercrombie	0.2	Aimmune Therapeutics	LITI	Receive and review Order of Referral to determine whether cases are related.
12/15/2020	Nowal Jamhour	0.5	Aimmune Therapeutics	MLP	Search/distribute active dockets and filings,
12/16/2020	Ashley Errington	0.2	Aimmune Therapeutics	LITI	Pro Hac Vice admission to ND Cal for Mr. Palestina.
12/16/2020	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Ok PHV
12/16/2020	Patrick Abercrombie	2	Aimmune Therapeutics	LITI	Register MJP with the Northern District of California ECF system. Draft, revise and finalize Motion for Pro Hac Vice for MJP and file same.
12/21/2020	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Review lead docs
12/22/2020	Patrick Abercrombie	0.6	Aimmune Therapeutics	LITI	Receive and review Order regarding Motion for Administrative Relief and Clerk's Notice. Calendar consent or declination deadline.
12/23/2020	Patrick Abercrombie	0.3	Aimmune Therapeutics	LITI	Receive and review Order Reassigning Case and Order Setting Case Management Conference. Calendar dates.
12/28/2020	Michael Palestina	0.6	Aimmune Therapeutics	COMP	Final review & edits
12/29/2020	Ashley Errington	0.1	Aimmune Therapeutics	LITI	Filing Consent to Proceed before Magistrate Judge.
12/29/2020	Brian Mears	0.7	Aimmune Therapeutics	LITI	MJP PHV
12/29/2020	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Issues re: consent to magistrate; file
01/04/2021	Patrick Abercrombie	2.1	Aimmune Therapeutics	LITI	Calendar dates for Case Management Conference and Joint Case Management Statement. Receive and review Re-Notice of Motions, Proposed Order, and Joint Response re: Movants Motion to Consolidate, Appoint Lead Plaintiff, and Approve Counsel. Receive and review Orders granting Motions for Pro Hac Vice for MJP and Monteverde, and Consent/Declination to Magistrate. Receive and review Notice Resetting Deadline re: Motion to Consolidate, Appoint Lead Plaintiff, and Approve Counsel and recalendar hearing date. Motion to Consolidate, Appoint Lead Plaintiff, and Approve Counsel. Consent or Declination to Proceed Before Magistrate. Motion to Consolidate, Appoint Lead Plaintiff, and Approve Counsel. Receive and review Notice of Reassignment. Receive and review Order Reassigning Case.

Bill Date	Staff	Duration	Case	Code	Description
01/05/2021	Patrick Abercrombie	0.6	Aimmune Therapeutics	LITI	Receive and review Case Management Conference order and calendar dates from order. Review local rules from the Northern District of California regarding the calculation of dates. Receive and review Notice of Eligibility for Video Recording.
01/07/2021	Patrick Abercrombie	0.2	Aimmune Therapeutics	LITI	Receive and review revised Case Management Order and revise calendar entries.
01/19/2021	Patrick Abercrombie	0.3	Aimmune Therapeutics	LITI	Receive and review Certificate of Counsel Regarding Service of Standing Order, Second Re-Notice of Motions and Responses re: Motions to Consolidate, Appoint Lead Plaintiff, and Approve Lead Counsel. Calendar hearing dates for same.
01/26/2021	Michael Palestina	0.6	Aimmune Therapeutics	LITI	Call w/ Jordan; corr re: same
01/26/2021	Michael Palestina	2.5	Aimmune Therapeutics	MLP	Edit MLP
02/10/2021	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corr w/ opp counsel
02/22/2021	Michael Palestina	1.1	Aimmune Therapeutics	LITI	Review draft complaint & lead order
02/23/2021	Abbey Barton	0.5	Aimmune Therapeutics	LITI	Review and save Order for Appointment of Co-Lead Plaintiffs & Counsel consolidating the Bushansky and Germano actions; Calculate and calendar deadline to file consolidated complaint.
02/23/2021	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Status report
02/24/2021	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Calls w. client, D counsel, & co-counsel; status report
02/25/2021	Abbey Barton	0.2	Aimmune Therapeutics	LITI	Review Stipulation to determine deadline for Joint Case Management Statement.
02/25/2021	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Issues re: deadlines
03/03/2021	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Call w. D counsel
03/05/2021	Michael Palestina	0.7	Aimmune Therapeutics	LITI	Draft Court updated, corr re: same
03/06/2021	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Update letter
03/08/2021	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Update letter corr
03/10/2021	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Update on file; review fed stip
03/11/2021	Abbey Barton	0.2	Aimmune Therapeutics	LITI	Review and save letter to Chancellor re: status report and calendar deadlines.
03/12/2021	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Ok stipulation
03/16/2021	Abbey Barton	0.2	Aimmune Therapeutics	LITI	Obtain Stipulation and Proposed Order to Stay Proceedings Pending Delaware Chancery Court Decision from Lexis Courtlink; review and save to file.
03/17/2021	Abbey Barton	0.2	Aimmune Therapeutics	LITI	Review and save Stipulation to Stay Proceedings, Order, and Directions to Parties issued by the Court; calendar updated deadline for Joint Status Report.
03/23/2021	Abbey Barton	0.2	Aimmune Therapeutics	LITI	Review and save Defendant's Motion to Enforce Confidentiality Agreement and respective attachments.
03/26/2021	Michael Palestina	4.2	Aimmune Therapeutics	LITI	Draft motion response
03/29/2021	Michael Palestina	2.8	Aimmune Therapeutics	LITI	Work on response
03/30/2021	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Edits to response
03/31/2021	Michael Palestina	3	Aimmune Therapeutics	LITI	Edits to response
04/01/2021	Brian Mears	0.5	Aimmune Therapeutics	LITI	MJP Pro Hac Pleadings
04/01/2021	Michael Palestina	3.4	Aimmune Therapeutics	LITI	Draft dec; finalize brief; update client
04/06/2021	Abbey Barton	0.2	Aimmune Therapeutics	LITI	Review and save Plaintiff's Response to Defendant's Motion to Enforce Confidentiality Agreement & Declaration of M. Palestina in support of the same.
04/06/2021	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Update client Celia
04/22/2021	Abbey Barton	0.1	Aimmune Therapeutics	LITI	Review and save letter from Chancellor re: Hearing on Motion to Enforce Confidentiality Agreement.
05/07/2021	Michael Palestina	0.4	Aimmune Therapeutics	LITI	PHV out
05/10/2021	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corr re: hearing date

Bill Date	Staff	Duration	Case	Code	Description
05/25/2021	Abbey Barton	0.2	Aimmune Therapeutics	LITI	Review and save court stamped copy of letter from Chancellor Sleights re: rescheduling of hearing on Motion to Enforce Confidentiality Agreement; update calendar entry.
08/04/2021	Michael Palestina	1.6	Aimmune Therapeutics	LITI	Oral arg prep
08/05/2021	Michael Palestina	3.1	Aimmune Therapeutics	COMP	Hearing prep
08/06/2021	Michael Palestina	1.3	Aimmune Therapeutics	LITI	Hearing
08/23/2021	Michael Palestina	1	Aimmune Therapeutics	LITI	Complaint review
08/24/2021	Michael Palestina	4.1	Aimmune Therapeutics	COMP	Finish complaint review; review public filings & 220 complaint; disc w/ Brian
08/27/2021	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Assignment to Brian
09/04/2021	Brian Mears	3.5	Aimmune Therapeutics	DCDR	Research for complaint.
09/14/2021	Brian Mears	2	Aimmune Therapeutics	COMP	Research re Lead Plaintiff and separate complaint in state court
09/16/2021	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Scheduling stip
09/16/2021	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Scheduling stip
09/20/2021	Brian Mears	4.5	Aimmune Therapeutics	LITI	Research for complaint, review conference call transcripts
09/24/2021	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Convo with Brian
09/27/2021	Brian Mears	2	Aimmune Therapeutics	LITI	Research
09/28/2021	Michael Palestina	3.9	Aimmune Therapeutics	COMP	Edits to amended complaint; call w. client
09/29/2021	Brian Mears	4	Aimmune Therapeutics	COMP	Edits to Amended Complaint
09/29/2021	Michael Palestina	2.6	Aimmune Therapeutics	LITI	Review edits; call w. Juan; to Cecilia
09/30/2021	Michael Palestina	2.9	Aimmune Therapeutics	LITI	Final review; calls & corr re: last minute edits
12/22/2021	Michael Palestina	2.1	Aimmune Therapeutics	LITI	Work on MTD opp
01/03/2022	Michael Palestina	3.2	Aimmune Therapeutics	LITI	MTD opp work
01/04/2022	Michael Palestina	5.1	Aimmune Therapeutics	LITI	MTD opp work
01/05/2022	Michael Palestina	10.7	Aimmune Therapeutics	DISP	MTD opp
01/06/2022	Michael Palestina	11.1	Aimmune Therapeutics	LITI	MTD opp
01/09/2022	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Mtd opp corr
01/10/2022	Brian Mears	1.2	Aimmune Therapeutics	DISP	Research re application of safe harbor to Tender offer
01/10/2022	Michael Palestina	6	Aimmune Therapeutics	COMP	MTD & complaint review; edits to brief
01/11/2022	Brian Mears	5	Aimmune Therapeutics	DISP	Cite checks / edit to MTD Opp
01/11/2022	Brian Mears	4	Aimmune Therapeutics	LITI	Cite checks / nits edit
01/11/2022	Michael Palestina	4.8	Aimmune Therapeutics	COMP	Finalize and file
02/15/2022	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Triage reply
02/22/2022	Michael Palestina	1	Aimmune Therapeutics	LITI	Edit/ corr/ file objection to reply
03/09/2022	Michael Palestina	2.1	Aimmune Therapeutics	LITI	Surreply
04/29/2022	Michael Palestina	2.4	Aimmune Therapeutics	LITI	Hearing & follow up.
05/11/2022	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Review 16(f) & call re: same
05/12/2022	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Review CMC
06/06/2022	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Status report
06/08/2022	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corr re: status
06/09/2022	Brian Mears	2.5	Aimmune Therapeutics	LITI	Initial Disclosures
06/10/2022	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Disclosures
06/24/2022	Brian Mears	3	Aimmune Therapeutics	DCDR	RFPD and ROGS
06/30/2022	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Corr re: deadline

Bill Date	Staff	Duration	Case	Code	Description
07/01/2022	Michael Palestina	1.4	Aimmune Therapeutics	LITI	Edit discovery
08/22/2022	Michael Palestina	1.1	Aimmune Therapeutics	LITI	Confi edits
09/21/2022	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Doc review & corr
09/22/2022	Michael Palestina	2.2	Aimmune Therapeutics	LITI	Edit brief
10/03/2022	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Discovery extension
11/04/2022	Michael Palestina	2.4	Aimmune Therapeutics	LITI	Disco response edits
11/06/2022	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Review edits
11/07/2022	Michael Palestina	0.6	Aimmune Therapeutics	DISC	Review & edit disco responses
11/14/2022	Michael Palestina	1	Aimmune Therapeutics	LITI	Disocvery call prep
11/15/2022	Michael Palestina	1	Aimmune Therapeutics	LITI	Call w/ client; edit discovery
11/16/2022	Michael Palestina	0.3	Aimmune Therapeutics	LITI	To client
11/17/2022	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corr re: disco responses
11/18/2022	Michael Palestina	1.5	Aimmune Therapeutics	DCDR	Discovery
11/28/2022	Brian Mears	1	Aimmune Therapeutics	LITI	Nit edits to discovery responses
11/28/2022	Michael Palestina	1.5	Aimmune Therapeutics	LITI	Finalize & send discovery
12/01/2022	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Review search term edits
12/02/2022	Michael Palestina	1	Aimmune Therapeutics	LITI	Discussion & corr re: search terms
12/13/2022	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Call w/ D counsel
12/20/2022	Michael Palestina	1.5	Aimmune Therapeutics	LITI	Search term revisions
12/26/2022	Michael Palestina	0.6	Aimmune Therapeutics	LITI	Corr re deadline
01/10/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Follow up re: search terms
01/12/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corr re search terms
01/13/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corr & call re search terms
01/17/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corr re appeal opp
01/23/2023	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Subpoena & dismissal review
01/24/2023	Michael Palestina	1	Aimmune Therapeutics	LITI	First edits to appeal opp.
01/25/2023	Michael Palestina	4.3	Aimmune Therapeutics	LITI	Further edits and review.
01/30/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Review & respond re search terms
01/31/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Follow up to appeal opp.
02/02/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Call & corr re JPM subpoena
02/08/2023	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corr re: deadline; production work
02/09/2023	Michael Palestina	1	Aimmune Therapeutics	LITI	Docs together for production
02/13/2023	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Production out; call w/ Juan
02/22/2023	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corr re subpoena response
02/23/2023	Michael Palestina	1	Aimmune Therapeutics	LITI	Hearing notes; calls & corr
02/24/2023	Michael Palestina	1	Aimmune Therapeutics	LITI	Hearing
02/27/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Nestle subpoena call
03/01/2023	Rhosean Scott	3.2	Aimmune Therapeutics	LITI	Review recent case activity and research local rules/pleadings re COA. Prepare draft Notice of COA.
03/01/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Call
03/06/2023	Rhosean Scott	0.4	Aimmune Therapeutics	LITI	Edit draft notice of COA.
03/07/2023	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Edit draft Notice of COA.
03/08/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Edit Hague docs

Bill Date	Staff	Duration	Case	Code	Description
03/20/2023	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Finalize edits for draft Notice of COA.
03/25/2023	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corresp re: new docs
03/26/2023	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Update client
03/27/2023	Rhosean Scott	0.4	Aimmune Therapeutics	LITI	Communication w/ MP rre case status and new production.
03/27/2023	Michael Palestina	1	Aimmune Therapeutics	LITI	Calls and corresp re: redactions, doc production
03/28/2023	Rhosean Scott	4.1	Aimmune Therapeutics	LITI	Review AC; prepare notes in preparation for document review.
03/28/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Corresp re: review and pp and reply re: Hague subpoena
03/29/2023	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review AC and related documents; prepare notes in preparation for document review.
03/29/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Call and corresp re: Hauge subpoena
03/30/2023	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review AC, MTD and related documents; prepare notes in preparation for document review.
03/30/2023	Michael Palestina	0.6	Aimmune Therapeutics	LITI	Corresp and calls re: Hague subpoena
03/31/2023	Rhosean Scott	7.8	Aimmune Therapeutics	LITI	Review MTD, timeline, and related documents; prepare notes in preparation for document review.
03/31/2023	Lewis Kahn	0.5	Aimmune Therapeutics	STMT	Comms mp; juan email
04/01/2023	Michael Palestina	0.9	Aimmune Therapeutics	LITI	Triage docs.
04/03/2023	Michael Palestina	0.2	Aimmune Therapeutics	COMP	Stipulation on file
04/05/2023	Rhosean Scott	10	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/06/2023	Rhosean Scott	5.8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/07/2023	Rhosean Scott	7.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/10/2023	Lewis Kahn	0.2	Aimmune Therapeutics	STMT	Comms Juan
04/10/2023	Rhosean Scott	8.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/11/2023	Rhosean Scott	8.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents and AC; update timeline of key events and personal notes.
04/12/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents and AC; update timeline of key events and personal notes.
04/13/2023	Lewis Kahn	0.5	Aimmune Therapeutics	STMT	Comms def, our group
04/13/2023	Lewis Kahn	0.2	Aimmune Therapeutics	STMT	Comms group, defense re mediation
04/13/2023	Rhosean Scott	7.7	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/13/2023	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call re: redactions
04/14/2023	Rhosean Scott	7.7	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents and AC; update timeline of key events and personal notes.
04/17/2023	Lewis Kahn	0.2	Aimmune Therapeutics	STMT	Comms defendants
04/17/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/18/2023	Rhosean Scott	10	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/19/2023	Rhosean Scott	8.5	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/20/2023	Rhosean Scott	7.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/21/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Comms re: Lazard
04/24/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Call with Juan re: Priv logs
04/25/2023	Rhosean Scott	8.6	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/26/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
04/26/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: survey
04/27/2023	Rhosean Scott	1.1	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
05/01/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Call re: schedule
05/08/2023	Lewis Kahn	0.2	Aimmune Therapeutics	STMT	Comms juan
05/09/2023	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Call re: mediation
05/15/2023	Rhosean Scott	0.8	Aimmune Therapeutics	LITI	Review and update case notes from document production.

Bill Date	Staff	Duration	Case	Code	Description
05/15/2023	Rhosean Scott	2.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
05/15/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DCDR	Review communication from MP re M&A workflow.
05/16/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
05/17/2023	Rhosean Scott	7.8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
05/18/2023	Rhosean Scott	8.7	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
05/19/2023	Rhosean Scott	7.1	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
05/24/2023	Rhosean Scott	5.4	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events. Communication w/MP re review status.
05/24/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Call re: schedule and strategy
05/25/2023	Rhosean Scott	7.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/01/2023	Rhosean Scott	4.2	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/02/2023	Rhosean Scott	6.5	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/02/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: review schedule
06/05/2023	Rhosean Scott	7.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/06/2023	Rhosean Scott	7.4	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events. Review communications from MP/DM re new production.
06/07/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/08/2023	Rhosean Scott	6.6	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/08/2023	Michael Palestina	1.1	Aimmune Therapeutics	LITI	Revise 3rd party search terms
06/09/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/14/2023	Rhosean Scott	5.4	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/15/2023	Rhosean Scott	6.4	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/16/2023	Rhosean Scott	6.8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/20/2023	Rhosean Scott	7.1	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/21/2023	Rhosean Scott	6.8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/21/2023	Michael Palestina	0.8	Aimmune Therapeutics	LITI	corresp and call re: discovery and maintenance period
06/22/2023	Rhosean Scott	8.4	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/22/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Calls and corresp re: schedule
06/23/2023	Rhosean Scott	5.7	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/26/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/26/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/27/2023	Rhosean Scott	8.2	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
06/28/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents/related case notes; update timeline of key events.
06/29/2023	Rhosean Scott	6.9	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
07/05/2023	Rhosean Scott	7.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
07/05/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DCDR	Review communications from co-counsel re Nestle production.
07/06/2023	Rhosean Scott	8.3	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents/related case notes; update timeline of key events.
07/07/2023	Rhosean Scott	8.2	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
07/10/2023	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Review communications from co-counsel re shareholder survey responses.
07/10/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
07/11/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents/related case notes; update timeline of key events.
07/12/2023	Rhosean Scott	7.2	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.

Bill Date	Staff	Duration	Case	Code	Description
07/13/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
07/14/2023	Rhosean Scott	7.8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents/related case notes; update timeline of key events.
07/17/2023	Rhosean Scott	4.6	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents/related case notes; update timeline of key events.
07/17/2023	Rhosean Scott	2.9	Aimmune Therapeutics	DCDR	Review timeline for hot docs; run related searches and prepare summary of key docs.
07/18/2023	Rhosean Scott	6	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents/related case notes.; update timeline of key events.
07/18/2023	Rhosean Scott	1.8	Aimmune Therapeutics	DCDR	Update summary of key docs; run related searches and pull hot docs.
07/19/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 4 production for relevant documents; update timeline of key events.
07/20/2023	Rhosean Scott	7.8	Aimmune Therapeutics	DCDR	Review Volume 4 & 5 productions for relevant documents/related case notes; update timeline of key events.
07/21/2023	Rhosean Scott	7.4	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents/related case notes; update timeline of key events.
07/24/2023	Rhosean Scott	2.6	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
07/25/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents/related case notes; update timeline of key events.
07/26/2023	Rhosean Scott	7.4	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents/related case notes; update timeline of key events.
07/27/2023	Rhosean Scott	1.5	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
07/28/2023	Rhosean Scott	0.5	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
07/31/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/01/2023	Rhosean Scott	7.5	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/02/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/03/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/04/2023	Rhosean Scott	8.2	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/07/2023	Rhosean Scott	7.8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/08/2023	Rhosean Scott	8.1	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/09/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents/related case notes; update timeline of key events.
08/10/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/11/2023	Rhosean Scott	7	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/12/2023	Rhosean Scott	1	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/14/2023	Rhosean Scott	7.8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/15/2023	Rhosean Scott	7.7	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/16/2023	Rhosean Scott	8.1	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/17/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/18/2023	Rhosean Scott	7.1	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/20/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: discovery
08/21/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents/related case notes; update timeline of key events.
08/22/2023	Rhosean Scott	7.8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
08/23/2023	Rhosean Scott	8.1	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/05/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Call and corresp re: search terms
09/11/2023	Rhosean Scott	6.5	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/12/2023	Rhosean Scott	6.5	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/13/2023	Rhosean Scott	5.8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/14/2023	Rhosean Scott	2.1	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/15/2023	Rhosean Scott	6.8	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/18/2023	Rhosean Scott	7.5	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/19/2023	Rhosean Scott	5.7	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.



Bill Date	Staff	Duration	Case	Code	Description
09/21/2023	Rhosean Scott	1.6	Aimmune Therapeutics	DCDR	Review Volume 5 production for relevant documents; update timeline of key events.
09/25/2023	Rhosean Scott	1.9	Aimmune Therapeutics	DCDR	Review Volume 5 and 6 productions for relevant documents; update timeline of key events.
09/25/2023	Rhosean Scott	0.2	Aimmune Therapeutics	DCDR	Review team communications re Lazard production and related depositions.
09/26/2023	Rhosean Scott	7.8	Aimmune Therapeutics	DCDR	Review Volume 6 production for relevant documents; update timeline of key events. Prepare summary of existing defendant and third-party productions; related communications with MP.
09/26/2023	Michael Palestina	2.8	Aimmune Therapeutics	LITI	Call with defs, prep for same, organize discovery timeline, call with Rhosean.
09/27/2023	Rhosean Scott	8.4	Aimmune Therapeutics	DCDR	Review Volume 6 production for relevant documents; update timeline of key events. Related team communications re review of productions and targeted searches.
09/27/2023	Michael Palestina	3.1	Aimmune Therapeutics	LITI	calls and corresp re: docu redaction issue, chart out, case timeline; assignments to various team members.
09/28/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Volume 6 production for relevant documents; update timeline of key events and related notes.
09/28/2023	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Review communications with Ds re deposition schedule.
09/28/2023	Michael Palestina	0.6	Aimmune Therapeutics	LITI	Corres re: schedule
09/29/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Volume 6 production for relevant documents; update timeline of key events.
09/29/2023	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Review communications with Ds re deposition schedule.
10/01/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review JPM Volume 2 production for relevant documents; update timeline of key events. Related communication with BM re timeline.
10/02/2023	Rhosean Scott	8.1	Aimmune Therapeutics	DCDR	Review Volume 6 production for relevant documents; update timeline of key events.
10/03/2023	Rhosean Scott	7.6	Aimmune Therapeutics	DCDR	Review Volume 6 production for relevant documents; update timeline of key events.
10/03/2023	Rhosean Scott	0.2	Aimmune Therapeutics	DCDR	Review communications with co-counsel re document production and related depositions.
10/03/2023	Michael Palestina	1.1	Aimmune Therapeutics	LITI	Multi calls and corresp re: schedule and discovery plan
10/04/2023	Rhosean Scott	9	Aimmune Therapeutics	DCDR	Review Volume 6 production for relevant documents; update timeline of key events. Related communication with co-counsel re Lazard production.
10/04/2023	Michael Palestina	0.9	Aimmune Therapeutics	LITI	Calls and communications re: schedule and discovery review, triage findings
10/05/2023	Rhosean Scott	8.7	Aimmune Therapeutics	DCDR	Review Volume 6 + 7 production for relevant documents; update timeline of key events. Add Lazard documents to timeline.
10/06/2023	Rhosean Scott	6.7	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events.
10/08/2023	Rhosean Scott	1.9	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events.
10/08/2023	Michael Palestina	2.4	Aimmune Therapeutics	LITI	Timeline review
10/09/2023	Rhosean Scott	5	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events. Related communications re production.
10/09/2023	Michael Palestina	3.2	Aimmune Therapeutics	LITI	Complete 1st review of timeline
10/10/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events. Related communications from MP re timeline.
10/10/2023	Michael Palestina	6.2	Aimmune Therapeutics	LITI	Edit ROGS / RFAs; calls and Corresp re: same.
10/11/2023	Brian Mears	0.2	Aimmune Therapeutics	LITI	Review emails re discovery / doc review / depositions
10/11/2023	Brian Mears	6	Aimmune Therapeutics	DCDR	Review timeline; begin targeted searches
10/11/2023	Brian Mears	1.6	Aimmune Therapeutics	DCDR	Targeted searches
10/11/2023	Rhosean Scott	7.6	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events. Related communications re production.
10/11/2023	Rhosean Scott	0.3	Aimmune Therapeutics	DISC	Review communications with Aimmune team re draft discovery requests and depo schedule.
10/11/2023	Michael Palestina	3.8	Aimmune Therapeutics	LITI	Timeline document review and annotations
10/12/2023	Brian Mears	5	Aimmune Therapeutics	DCDR	Targeted search



Bill Date	Staff	Duration	Case	Code	Description
10/12/2023	Rhosean Scott	8.1	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events. Pull key document for MP.
10/12/2023	Rhosean Scott	0.2	Aimmune Therapeutics	DCDR	Review communications re finalized discovery requests.
10/12/2023	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Finalize and send Second discovery
10/13/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events.
10/13/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: depo schedule
10/15/2023	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Discovery plan update
10/16/2023	Brian Mears	4	Aimmune Therapeutics	DCDR	Targeted searches
10/16/2023	Rhosean Scott	8.1	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events. Related communications re Volume 9 production.
10/16/2023	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Call with 3rd party counsel and corresp calls with Juan
10/17/2023	Brian Mears	8.4	Aimmune Therapeutics	DCDR	Targeted searches / Timeline work
10/17/2023	Gina Palermo	0.2	Aimmune Therapeutics	LITI	Emails regarding deposition and discovery dates
10/17/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Volume 7 production for relevant documents; update timeline of key events. Related communications re review and case plan.
10/17/2023	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Calls and corresp re: schedule and discovery
10/18/2023	Gina Palermo	0.2	Aimmune Therapeutics	LITI	Emails regarding deposition and discovery dates.
10/18/2023	Brian Mears	3.1	Aimmune Therapeutics	DCDR	Targeted search (Oxtoby + Greenblatt; Nestle + hostile)
10/18/2023	Rhosean Scott	7.5	Aimmune Therapeutics	DCDR	Review Volume 7, 8, and 9 productions for relevant documents; update timeline of key events.
10/18/2023	Michael Palestina	1.2	Aimmune Therapeutics	LITI	Call with client, court and defense counse re: clem Illegible and schedule
10/19/2023	Rhosean Scott	7.5	Aimmune Therapeutics	DCDR	Review Volume 9 production for relevant documents; update timeline of key events.
10/19/2023	Rhosean Scott	0.2	Aimmune Therapeutics	DISC	Review communications with co-counsel regarding depo schedule.
10/19/2023	Brian Mears	1.3	Aimmune Therapeutics	DCDR	Targeted searches
10/19/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Calls and corresp re: schedule
10/20/2023	Rhosean Scott	7.6	Aimmune Therapeutics	DCDR	Review AIMT Volume 9 and BOAS Volume 1 productions for relevant documents; update timeline of key events. Related communications re status of review in preparation for depositions.
10/20/2023	Michael Palestina	0.7	Aimmune Therapeutics	LITI	Corresp re: schedule and discovery review
10/23/2023	Rhosean Scott	8.3	Aimmune Therapeutics	DCDR	Review BOAS Volume 1 & 2 productions for relevant documents; update timeline of key events.
10/23/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Call with client
10/24/2023	Brian Mears	3	Aimmune Therapeutics	DCDR	Doc review / targeted searches
10/25/2023	Gina Palermo	0.2	Aimmune Therapeutics	DISC	Review proposed revised scheduling order and emails regarding same.
10/25/2023	Brian Mears	6	Aimmune Therapeutics	DCDR	Targeted searches; timeline
10/25/2023	Rhosean Scott	8.2	Aimmune Therapeutics	DCDR	Review BOAS Volume 2 production for relevant documents; update timeline of key events.
10/25/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DISC	Review communications from MP re deposition schedule.
10/26/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review BOAS Volume 2 production for relevant documents; update timeline of key events.
10/26/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DCDR	Review communications from D's counsel and MP re deposition schedule.
10/26/2023	Brian Mears	2.5	Aimmune Therapeutics	DCDR	Timeline / targeted searches
10/26/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: schedule
10/27/2023	Rhosean Scott	8.1	Aimmune Therapeutics	DCDR	Review BOAS Volume 2 production for relevant documents; update timeline of key events.
10/30/2023	Gina Palermo	0.2	Aimmune Therapeutics	LITI	Review emails regarding discovery schedules and assignments
10/30/2023	Rhosean Scott	7.4	Aimmune Therapeutics	DCDR	Review BOAS Volume 2 production for relevant documents; update timeline of key events.
10/30/2023	Michael Palestina	0.4	Aimmune Therapeutics	DCDR	Corresp re: schedule and doc review
10/31/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review JPM Volume 1 & 2 productions for relevant documents; update timeline of key events.

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10/31/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DISC	Review notices of deposition for AIMT execs and BOD.
10/31/2023	Michael Palestina	0.6	Aimmune Therapeutics	LITI	Calls and corresp re: doc review status and schedule
11/01/2023	Brian Mears	6	Aimmune Therapeutics	DCDR	Doc review / timeline work / Targeted searches
11/01/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review JPM Volume 2 production for relevant documents; update timeline of key events.
11/01/2023	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Corresp and calls re: schedule
11/02/2023	Brian Mears	6.5	Aimmune Therapeutics	DCDR	Targeted searches / timeline work / Add inserts to live draft for MJP
11/02/2023	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review JPM Volume 2 production for relevant documents; update timeline of key events. Related communications with MP, BM, and co-counsel re timeline.
11/03/2023	Rhosean Scott	1.1	Aimmune Therapeutics	DCDR	Review communications from case team re key documents; review related AIMT/Lazard documents. Communication with co-counsel re updated timeline.
11/03/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DISC	Review communications with co-counsel deposition schedule.
11/03/2023	Michael Palestina	1.3	Aimmune Therapeutics	LITI	Calls and corresp re: schedule
11/06/2023	Gina Palermo	0.5	Aimmune Therapeutics	LITI	Emails regarding scheduling depositions. Review pleadings regarding procedure for Swiss depositions.
11/06/2023	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Call and corresp re: schedule
11/07/2023	Gina Palermo	0.2	Aimmune Therapeutics	LITI	Review emails and documents regarding Swiss depositions.
11/07/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DISC	Review communication with defense re authentication of discovery and expert stipulations.
11/07/2023	Michael Palestina	0.4	Aimmune Therapeutics	EXPT	Calls and corresp re: authenticity / experts / schedule
11/08/2023	Rhosean Scott	0.3	Aimmune Therapeutics	DISC	Review communications re ROG extension and Adelman depo; stipulation/letter request re Behar and Hendrix depositions.
11/09/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Update timeline and pull key documents/associated families in preparation for depositions. Related communications with BM, MJP, and DM.
11/10/2023	Rhosean Scott	8.3	Aimmune Therapeutics	DCDR	Update timeline and pull key documents/associated families in preparation for depositions. Related communications with MJP and DM.
11/11/2023	Michael Palestina	1	Aimmune Therapeutics	LITI	Travel arrangements
11/12/2023	Michael Palestina	8.3	Aimmune Therapeutics	LITI	Timeline review and depo prep
11/13/2023	Gina Palermo	2.4	Aimmune Therapeutics	LITI	Review case pleadings. Phone call with Mr. Palestina re research assignments. Emails with co-counsel re research assignments. begin researching jury bonds and research needed for depositions.
11/13/2023	Rhosean Scott	6.8	Aimmune Therapeutics	DCDR	Update missing bates and date info in timeline; Review key timeline documents and add relevant deponents; related communications with DM and MJP.
11/13/2023	Rhosean Scott	0.2	Aimmune Therapeutics	DISC	Review communications from co-counsel re experts and Nestle deponents.
11/13/2023	Michael Palestina	5.2	Aimmune Therapeutics	LITI	Multi calls and corresp re: scheduling and depositions, depo prep
11/14/2023	Brian Mears	1	Aimmune Therapeutics	LITI	Review timeline
11/14/2023	Gina Palermo	5.5	Aimmune Therapeutics	LITI	Continue review of case materials. Research re: jury costs; imputed authority of officers; and adequacy of class representatives. Draft memos on each topic.
11/14/2023	Michael Palestina	7.8	Aimmune Therapeutics	LITI	Depo prep
11/15/2023	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Continue research and drafting memo re: adequacy of class reps and imputed authority of officers. Finalize and circulate same.
11/15/2023	Rhosean Scott	7	Aimmune Therapeutics	DCDR	Update timeline and organize documents in preparation for Enright deposition. Related communications with BM and MP re AIMT Bd. presentation/minutes.
11/15/2023	Michael Palestina	5	Aimmune Therapeutics	LITI	Depo prep
11/16/2023	Brian Mears	1	Aimmune Therapeutics	DISC	Review Timeline; depo outline for Enright Depo
11/16/2023	Gina Palermo	3	Aimmune Therapeutics	LITI	Begin drafting motion for class certification. Emails with co-counsel regarding same.

Bill Date	Staff	Duration	Case	Code	Description
11/16/2023	Rhosean Scott	1.4	Aimmune Therapeutics	DCDR	Run searches for key documents in preparation for Enright depo; related communications with MP.
11/16/2023	Michael Palestina	8.5	Aimmune Therapeutics	LITI	Depo prep and call
11/17/2023	Brian Mears	4	Aimmune Therapeutics	DISC	Depo of Enright
11/17/2023	Brian Mears	1.5	Aimmune Therapeutics	DISC	Review materials before depo (timeline, exhibits)
11/17/2023	Gina Palermo	4.2	Aimmune Therapeutics	LITI	Attend deposition of Patrick Enright.
11/17/2023	Michael Palestina	4.5	Aimmune Therapeutics	LITI	Corresp re: authenticity stipulation; Enright depo
11/20/2023	Gina Palermo	2.2	Aimmune Therapeutics	LITI	Legal research regarding authenticity of documents produced in discovery and need to admissions/stipulations. Memo and email to Mr. Palestina re: same.
11/20/2023	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Corresp re: depositions, review authenticity research
11/21/2023	Alexander Burns	0.4	Aimmune Therapeutics	LITI	Preparation of binder of materials re: client deposition preparation.
11/21/2023	Alexander Burns	0.5	Aimmune Therapeutics	LITI	Delivery of deposition prep binder to Michael Palestina.
11/21/2023	Michael Palestina	2.5	Aimmune Therapeutics	LITI	McDade prep and client depo prep
11/22/2023	Rhosean Scott	0.1	Aimmune Therapeutics	DISC	Review communications re revised Lazard/BofA depo schedule.
11/22/2023	Michael Palestina	3.8	Aimmune Therapeutics	LITI	Multi calls re: depo, McDade depo prep, depo prep outline for Cecelia
11/27/2023	Michael Palestina	2.2	Aimmune Therapeutics	LITI	Multi calls and corresp re: schedule, depositions
11/28/2023	Gina Palermo	0.2	Aimmune Therapeutics	LITI	Review defendants' discovery responses and emails among co-counsel re: same.
11/28/2023	Brian Mears	3.1	Aimmune Therapeutics	DISC	Depo of McDade
11/28/2023	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Attend portion of deposition of McDade
11/28/2023	Michael Palestina	3.9	Aimmune Therapeutics	LITI	Call with bankers counsel, McDade depo
11/29/2023	Rhosean Scott	5.5	Aimmune Therapeutics	DCDR	Review BOAS timeline documents and prepare summary of potential deponents; update timeline.
11/30/2023	Michael Palestina	0.6	Aimmune Therapeutics	LITI	Behar depo prep
12/01/2023	Rhosean Scott	1.5	Aimmune Therapeutics	DCDR	Organize documents in preparation for Behar depo; related communication with MP.
12/01/2023	Michael Palestina	4.6	Aimmune Therapeutics	LITI	Call with client, Behar depo prep
12/02/2023	Michael Palestina	0.8	Aimmune Therapeutics	DISC	Behar depo prep
12/03/2023	Rhosean Scott	0.4	Aimmune Therapeutics	DCDR	Review communication from MP re Behar depo; pull related document and update exhibits.
12/04/2023	Brian Mears	0.2	Aimmune Therapeutics	DCDR	Review Juan email chain re discovery responses
12/04/2023	Gina Palermo	0.2	Aimmune Therapeutics	LITI	Review emails among co-counsel re: documents recently produced.
12/04/2023	Michael Palestina	5.3	Aimmune Therapeutics	TRVL	Travel to depo, Pemberton depo prep
12/05/2023	Gina Palermo	3.5	Aimmune Therapeutics	LITI	Observe deposition of Cecelia Pemberton
12/05/2023	Brian Mears	3.5	Aimmune Therapeutics	LITI	Pemberton Depo 11-2:30p
12/05/2023	Michael Palestina	10	Aimmune Therapeutics	LITI	Pemberton depo, Behar depo prep, Calls and corresp re: same and schedule return travel
12/06/2023	Gina Palermo	0.3	Aimmune Therapeutics	LITI	Review revised discovery schedule. Emails with co-counsel re: depositions schedule.
12/06/2023	Michael Palestina	4.7	Aimmune Therapeutics	DISC	Behar prep, call with defense counsel, discovery review
12/07/2023	Brian Mears	2.5	Aimmune Therapeutics	DISC	Plaintiff depo 11a - 1:30p
12/07/2023	Rhosean Scott	2.8	Aimmune Therapeutics	DCDR	Communications with MP re depo prep; pull related exhibits.
12/07/2023	Rhosean Scott	0.2	Aimmune Therapeutics	DISC	Review communications from co-counsel re revised depo schedule.
12/07/2023	Michael Palestina	6.4	Aimmune Therapeutics	DISC	Suitak Depo, discovery review and depo prep
12/08/2023	Brian Mears	0.1	Aimmune Therapeutics	DISC	Review email re client depo
12/08/2023	Gina Palermo	1.9	Aimmune Therapeutics	LITI	Observe deposition of Barbara Svitak. Draft and send summary of same to co-counsel. Phone call with Mr. Palestina re: same.
12/08/2023	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Update timeline and organize key documents in preparation for Dallas/Bjerkholt depositions; related communications with MP and DM.

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12/08/2023	Michael Palestina	7.5	Aimmune Therapeutics	DISC	Corresp re: Suitak depo, depo prep re: Ballas & Bjerkholt
12/09/2023	Michael Palestina	6.8	Aimmune Therapeutics	DISC	Depo prep - Dallas and Bjerkholt
12/10/2023	Michael Palestina	2.4	Aimmune Therapeutics	DISC	Depo prep
12/11/2023	Rhosean Scott	0.9	Aimmune Therapeutics	DCDR	Update timeline with documents from Nestle/Aimmune productions.
12/11/2023	Michael Palestina	4	Aimmune Therapeutics	DISC	Depo prep
12/11/2023	Michael Palestina	4.5	Aimmune Therapeutics	TRVL	Travel
12/12/2023	Gina Palermo	6.5	Aimmune Therapeutics	LITI	Observe deposition of Jayson Dallas
12/12/2023	Brian Mears	6.3	Aimmune Therapeutics	DISC	Jayson Dallas Depo
12/12/2023	Michael Palestina	10.8	Aimmune Therapeutics	TRVL	Dallas depo, travel and prep for next
12/13/2023	Michael Palestina	9.3	Aimmune Therapeutics	DISC	Depo prep
12/14/2023	Brian Mears	5.8	Aimmune Therapeutics	DISC	Bjerkholt depo
12/14/2023	Rhosean Scott	3.1	Aimmune Therapeutics	DCDR	Communications with MP and DM related to depo prep. Update timeline with key documents from Lazard production; pull documents in preparation for Hendrix depo.
12/14/2023	Gina Palermo	5.5	Aimmune Therapeutics	LITI	Observe deposition of Eric Bjerkholt.
12/14/2023	Gina Palermo	0.8	Aimmune Therapeutics	LITI	Research re potential medical expert.
12/14/2023	Michael Palestina	8.5	Aimmune Therapeutics	DISC	Bjerkholt depo
12/14/2023	Michael Palestina	8.5	Aimmune Therapeutics	TRVL	Travel return from Bjerkholt depo
12/15/2023	Gina Palermo	1	Aimmune Therapeutics	LITI	Discuss potential expert with Mr. Palestina. Online research regarding same.
12/15/2023	Michael Palestina	6.4	Aimmune Therapeutics	EXPT	Depo prep Herdrex, Behar, Oxtoby, Calls re: expert
12/16/2023	Michael Palestina	6.8	Aimmune Therapeutics	DISC	Depo Prep - Hadox, Behar, Oxtoby
12/17/2023	Michael Palestina	4.5	Aimmune Therapeutics	DISC	Depo Prep
12/18/2023	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Online research re: potential medical expert.
12/18/2023	Rhosean Scott	1.4	Aimmune Therapeutics	DCDR	Communications with MP and DM re depo exhibits; Review marked exhibits 30-77 in preparation for Hendrix, Behar, and Oxtoby depositions.
12/18/2023	Michael Palestina	7.8	Aimmune Therapeutics	DISC	Depo Prep
12/19/2023	Brian Mears	3.6	Aimmune Therapeutics	DISC	Hendrix deposition
12/19/2023	Gina Palermo	3.5	Aimmune Therapeutics	LITI	Observe deposition of Martin Hendrix.
12/19/2023	Brian Mears	0.7	Aimmune Therapeutics	DISC	Travel to MJP house; fed ex depo binder
12/19/2023	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Research re potential experts. Collect resources and annotate re: same. Emails with Mr. Palestina re: same.
12/19/2023	Michael Palestina	7	Aimmune Therapeutics	DISC	Hendricks depo, depo prep, travel to Oxtoby
12/20/2023	Brian Mears	6.5	Aimmune Therapeutics	DISC	Depo (Oxtoby); 8a -2:30p (listen remotely, transmit exhibits to D counsel)
12/20/2023	Gina Palermo	5.5	Aimmune Therapeutics	LITI	Observe deposition of Andrew Oxtoby.
12/20/2023	Michael Palestina	4.6	Aimmune Therapeutics	DISC	Oxtoby depo
12/20/2023	Michael Palestina	4	Aimmune Therapeutics	TRVL	Travel from Oxtoby depo
12/21/2023	Gina Palermo	3.3	Aimmune Therapeutics	LITI	Observe deposition of Greg Behar.
12/21/2023	Brian Mears	3.5	Aimmune Therapeutics	DISC	Deposition of Behar
12/21/2023	Michael Palestina	4	Aimmune Therapeutics	LITI	Behar depo
12/27/2023	Gina Palermo	1.2	Aimmune Therapeutics	LITI	Review pleadings and continue drafting motion for class certification.
12/28/2023	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Corresp re: discovery dispute
01/02/2024	Rhosean Scott	6.2	Aimmune Therapeutics	DISC	Review Volume 10 production for relevant documents and update timeline of key events. Related communication with MP.
01/08/2024	Rhosean Scott	1	Aimmune Therapeutics	DCDR	Review communication from MP re introduced exhibits; organize related documents.

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01/08/2024	Michael Palestina	1.5	Aimmune Therapeutics	DISC	Falberg depo work
01/09/2024	Rhosean Scott	0.7	Aimmune Therapeutics	DCDR	Review communication from MP re Adelman depo outline; pull relevant exhibits.
01/09/2024	Michael Palestina	5.3	Aimmune Therapeutics	DISC	Adelman depo prep
01/11/2024	Brian Mears	2.5	Aimmune Therapeutics	LITI	Observe depo (Falberg)
01/11/2024	Michael Palestina	12.6	Aimmune Therapeutics	DISC	Falberg depo, Adelman depo prep, BofA docs list to BofA counsel, review experts research
01/12/2024	Gina Palermo	4.5	Aimmune Therapeutics	LITI	Observe deposition of Dr. Adelman
01/12/2024	Gina Palermo	1.2	Aimmune Therapeutics	LITI	Research regarding potential experts. Phone call to potential expert. Emails with co-counsel regarding same.
01/12/2024	Brian Mears	3.5	Aimmune Therapeutics	LITI	Observe depo (Adelman)
01/12/2024	Michael Palestina	4.8	Aimmune Therapeutics	DISC	Adelman Depo and follow up and prep
01/16/2024	Gina Palermo	1	Aimmune Therapeutics	LITI	Research re potential experts. Email to co-counsel re: same.
01/16/2024	Michael Palestina	2.1	Aimmune Therapeutics	LITI	Adelman Deposition Prep.
01/17/2024	Brian Mears	0.1	Aimmune Therapeutics	LITI	Review email from MJP re BoA recent production
01/17/2024	Gina Palermo	0.5	Aimmune Therapeutics	LITI	Call with potential expert. Discuss same with co-counsel and emails among co-counsel re same.
01/17/2024	Rhosean Scott	0.1	Aimmune Therapeutics	DCDR	Review communications re BOAS_AIMMUNE Vol. 3 production.
01/18/2024	Brian Mears	1.3	Aimmune Therapeutics	DCDR	New BofA production
01/18/2024	Michael Palestina	1	Aimmune Therapeutics	LITI	Depo prep; calls with Juan, corresp re: expert
01/19/2024	Brian Mears	3	Aimmune Therapeutics	DISC	Observe Seltzer Depo
01/19/2024	Michael Palestina	8.4	Aimmune Therapeutics	LITI	Seltzer depo, BofA depo prep
01/20/2024	Brian Mears	2.5	Aimmune Therapeutics	DCDR	BofA production targeted searches
01/20/2024	Michael Palestina	7.5	Aimmune Therapeutics	LITI	Depo prep, work on expert materials
01/21/2024	Brian Mears	4.5	Aimmune Therapeutics	DCDR	Targeted searches in advance of BofA depo
01/21/2024	Michael Palestina	5.2	Aimmune Therapeutics	DISC	Depo prep, expert materials
01/22/2024	Gina Palermo	1	Aimmune Therapeutics	LITI	Call with Mr. Palestina and Mr. Jeffers re: expert report.
01/22/2024	Gina Palermo	0.2	Aimmune Therapeutics	LITI	Review emails among co-counsel re: potential medical expert.
01/22/2024	Brian Mears	8	Aimmune Therapeutics	DCDR	Targeted searches for depo prep
01/22/2024	Rhosean Scott	2.1	Aimmune Therapeutics	DCDR	Review communications from MP and BM re projections and banker bd. presentations; perform related searches
01/22/2024	Michael Palestina	5.8	Aimmune Therapeutics	DISC	Depo prep, narrative and expert work
01/23/2024	Gina Palermo	1.2	Aimmune Therapeutics	LITI	Review and send pertinent documents to Mr. Jeffers.
01/23/2024	Gina Palermo	2	Aimmune Therapeutics	DISC	Review prior discovery responses. Draft supplemental and amending discovery responses.
01/23/2024	Brian Mears	2	Aimmune Therapeutics	DISC	Observe BofA depo
01/23/2024	Michael Palestina	7.1	Aimmune Therapeutics	LITI	BofA depo, expert materials, Greenblott and JPM depo prep
01/24/2024	Gina Palermo	0.5	Aimmune Therapeutics	DISC	Draft supplemental and amending discovery responses. Emails with Mr. Palestina re: same.
01/24/2024	Brian Mears	3	Aimmune Therapeutics	DISC	Observe Greenblatt depo
01/24/2024	Gina Palermo	3.5	Aimmune Therapeutics	DISC	Observe deposition of Mr. Brian Greenblatt
01/24/2024	Michael Palestina	10.8	Aimmune Therapeutics	LITI	Greenblatt depo,. expert materials compliation, name file
01/25/2024	Gina Palermo	0.9	Aimmune Therapeutics	DISC	Draft supplemental discovery responses and send draft to Mr. Palestina.
01/25/2024	Gina Palermo	2	Aimmune Therapeutics	DISC	Observe deposition of JPM representative.
01/25/2024	Brian Mears	3	Aimmune Therapeutics	DISC	JP Morgan Depo
01/25/2024	Michael Palestina	2.5	Aimmune Therapeutics	LITI	JPM depo, listen in
01/29/2024	Michael Palestina	5	Aimmune Therapeutics	LITI	Depo prep, discovery responses and requests, file review
01/30/2024	Gina Palermo	2.5	Aimmune Therapeutics	EXPT	Review expert draft report and participate in confrence call with expert and co-counsel re: same.
01/30/2024	Gina Palermo	0.2	Aimmune Therapeutics	DISC	Review additional revisions to supplemental discovery responses and emails re: same.

Bill Date	Staff	Duration	Case	Code	Description
01/30/2024	Rhosean Scott	0.4	Aimmune Therapeutics	DCDR	Review communications from MP re Lazard docs; pull related materials in preparation for depo.
01/30/2024	Rhosean Scott	7.9	Aimmune Therapeutics	LITI	Review communication from MP re def. privilege log; prepare summary of potential objections.
01/30/2024	Michael Palestina	10.1	Aimmune Therapeutics	DISC	Discovery responses and requests
01/31/2024	Gina Palermo	0.7	Aimmune Therapeutics	DISC	Draft third set of requests for production of documents to defendants. Send same to Mr. Palestina.
01/31/2024	Gina Palermo	0.6	Aimmune Therapeutics	EXPT	Gather and send additional documents to Mr. Jeffers. Emails with co-counsel re: same.
01/31/2024	Rhosean Scott	6.3	Aimmune Therapeutics	LITI	Review def. privilege log and prepare summary of potential objections.
01/31/2024	Rhosean Scott	1.8	Aimmune Therapeutics	DCDR	Review communication from GP; perform searches for fairness projections in support of expert analysis.
01/31/2024	Michael Palestina	5.9	Aimmune Therapeutics	DISC	Discovery responses and requests
02/01/2024	Brian Mears	3	Aimmune Therapeutics	DISC	Kingston Depo
02/01/2024	Brian Mears	0.5	Aimmune Therapeutics	DISC	Review supplemental discovery to D's / P's responses
02/01/2024	Gina Palermo	3	Aimmune Therapeutics	LITI	Observe deposition of Lazard representative.
02/01/2024	Gina Palermo	1	Aimmune Therapeutics	LITI	Draft motion for class certification.
02/01/2024	Rhosean Scott	6.4	Aimmune Therapeutics	LITI	Communication with MP re privilege log and new production; complete review and finalize summary of potential objections.
02/01/2024	Rhosean Scott	0.4	Aimmune Therapeutics	DCDR	Run metadata searches in Lazard production.
02/01/2024	Rhosean Scott	1.4	Aimmune Therapeutics	DCDR	Review Vol. 11 production for relevant documents; update timeline of key events.
02/01/2024	Michael Palestina	6.8	Aimmune Therapeutics	DISC	Calls and corresp re: docs, file review, Lazard depo and prep
02/02/2024	Rhosean Scott	7.9	Aimmune Therapeutics	DCDR	Review Vol. 11 production for relevant documents; update timeline of key events.
02/02/2024	Gina Palermo	4.5	Aimmune Therapeutics	LITI	Review deposition transcripts of clients and continue drafting motion for class certification.
02/05/2024	Rhosean Scott	1.2	Aimmune Therapeutics	DCDR	Review Vol. 11 production for relevant documents; update timeline of key events.
02/05/2024	Rhosean Scott	6	Aimmune Therapeutics	LITI	Review communications from MP and organize related transcripts; review Akhawat deposition for key testimony.
02/06/2024	Rhosean Scott	7.8	Aimmune Therapeutics	LITI	Review Akhawat and Behar depositions for key testimony.
02/06/2024	Rhosean Scott	2.8	Aimmune Therapeutics	DCDR	Review communication from MP re 3rd party advisor; perform related searches for report disclosures in support of expert.
02/07/2024	Rhosean Scott	5.5	Aimmune Therapeutics	LITI	Review Behar deposition for key testimony.
02/08/2024	Rhosean Scott	7.4	Aimmune Therapeutics	LITI	Review Behar and Dallas depositions for key testimony. Communication with MP re summary of exhibits and relevant testimony; update related chart.
02/08/2024	Michael Palestina	4.2	Aimmune Therapeutics	DISC	Expert report review, call with experts, RFA and ROGS
02/09/2024	Rhosean Scott	8.1	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony. Related communication with MP.
02/09/2024	Michael Palestina	0.5	Aimmune Therapeutics	DISC	Final discovery out
02/12/2024	Rhosean Scott	8.1	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/13/2024	Rhosean Scott	6.3	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/13/2024	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corresp re: call
02/14/2024	Gina Palermo	4.2	Aimmune Therapeutics	CLAS	Draft class cert motion. Emails with co-counsel re: same.
02/14/2024	Rhosean Scott	9	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/14/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corresp re: class cert
02/15/2024	Gina Palermo	4.5	Aimmune Therapeutics	CLAS	Continue drafting class cert. motion. Legal research re: same.
02/15/2024	Rhosean Scott	9.2	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/18/2024	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Follow up re: discovery issues
02/19/2024	Michael Palestina	3.1	Aimmune Therapeutics	EXPT	Expert review

Bill Date	Staff	Duration	Case	Code	Description
02/20/2024	Gina Palermo	2.8	Aimmune Therapeutics	EXPT	Research re: expert report requirements and emails with Mr. Palestina regarding same. Participate in call with experts.
02/20/2024	Gina Palermo	2.5	Aimmune Therapeutics	CLAS	Continue legal research and drafting motion for class certification.
02/20/2024	Rhosean Scott	0.2	Aimmune Therapeutics	DCDR	Communication with GP re Lazard document; pull related native file.
02/20/2024	Rhosean Scott	1.8	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/20/2024	Michael Palestina	3.4	Aimmune Therapeutics	EXPT	Expert report and call
02/21/2024	Gina Palermo	2	Aimmune Therapeutics	CLAS	Continue drafting class certification motion. Discuss same with co-counsel.
02/21/2024	Rhosean Scott	7.9	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/21/2024	Rhosean Scott	0.5	Aimmune Therapeutics	DCDR	Communication with MP re Lazard document; review related document for info requested by expert.
02/21/2024	Michael Palestina	7.3	Aimmune Therapeutics	EXPT	Expert work
02/22/2024	Gina Palermo	5.5	Aimmune Therapeutics	CLAS	Continue drafting and revising class certification motion.
02/22/2024	Rhosean Scott	7.8	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/22/2024	Rhosean Scott	0.2	Aimmune Therapeutics	DCDR	Communication with MP re Lazard document and info requested by expert.
02/22/2024	Debbie Chase	1	Aimmune Therapeutics	DISC	Email from and to M. Palestina re draft responses to Defendants Second Set of Interrogatories, First Set of Interrogatories and First Set of Requests For Admission to Co-Lead Plaintiffs; Prepare draft responses and forward to M. Palestina
02/22/2024	Michael Palestina	4.6	Aimmune Therapeutics	EXPT	Expert work
02/23/2024	Rhosean Scott	8.1	Aimmune Therapeutics	LITI	Review Dallas deposition for key testimony; update summary of exhibits and relevant testimony.
02/23/2024	Gina Palermo	2.2	Aimmune Therapeutics	CLAS	Complete draft of class cert motion and send same to Mr. Palestina.
02/23/2024	Michael Palestina	2	Aimmune Therapeutics	EXPT	Expert work
02/26/2024	Rhosean Scott	7.5	Aimmune Therapeutics	LITI	Review Dallas and Bjerkholt depositions for key testimony; update summary of exhibits and relevant testimony. Communication with DM re exhibit summary.
02/27/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
02/28/2024	Rhosean Scott	9	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
02/29/2024	Gina Palermo	1.3	Aimmune Therapeutics	CLAS	Additional research, citing checking class certification brief. Multiple emails with Mr. Palestina.
02/29/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
02/29/2024	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Review communications with expert re shareholder records.
02/29/2024	Michael Palestina	5.2	Aimmune Therapeutics	CLAS	Class cert work
03/01/2024	Gina Palermo	2.2	Aimmune Therapeutics	CLAS	Research re 14(e) cases for class cert motion. Send results to co-counsel.
03/01/2024	Gina Palermo	1.3	Aimmune Therapeutics	DISC	Draft responses to requests for admission. Online research re: answers to same.
03/01/2024	Gina Palermo	0.9	Aimmune Therapeutics	CLAS	Draft client declaration for class cert motion.
03/01/2024	Rhosean Scott	7	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
03/01/2024	Michael Palestina	7.5	Aimmune Therapeutics	CLAS	Class cert work, disco responses
03/04/2024	Gina Palermo	3.4	Aimmune Therapeutics	CLAS	Additional research re: class cert motion. Conference call with co-counsel re: same. Multiple emails among co-counsel re: same.
03/04/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
03/04/2024	Michael Palestina	5.6	Aimmune Therapeutics	CLAS	Class cert work
03/05/2024	Gina Palermo	2	Aimmune Therapeutics	CLAS	Pull all exhibits to class cert brief. draft exhibit list re: same. Emails among co-counsel re: same.
03/05/2024	Rhosean Scott	2.6	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
03/05/2024	Rhosean Scott	3.8	Aimmune Therapeutics	DCDR	Communications with MP and DM re document reproduction. Update timeline of key events and organize related exhibits.
03/05/2024	Michael Palestina	2.6	Aimmune Therapeutics	CLAS	Class cert work



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03/06/2024	Gina Palermo	0.8	Aimmune Therapeutics	CLAS	Draft declaration of Monteverde. Send to co-counsel.
03/06/2024	Gina Palermo	7.5	Aimmune Therapeutics	DISC	Draft interrogatory timeline of events with exhibit references.
03/06/2024	Rhosean Scott	4.6	Aimmune Therapeutics	DCDR	Communications with DM re document reproduction. Update timeline of key events and organize related exhibits.
03/06/2024	Rhosean Scott	4.8	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
03/06/2024	Michael Palestina	5.5	Aimmune Therapeutics	CLAS	Class cert work, call with client, ROGS response work
03/07/2024	Gina Palermo	2	Aimmune Therapeutics	DISC	Complete interrogatory timeline of events and exhibit references
03/07/2024	Gina Palermo	3.6	Aimmune Therapeutics	CLAS	Finalize exhibits; fact-check brief; redact for confidential filing.
03/07/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Bjerkholt deposition for key testimony; update summary of exhibits and relevant testimony.
03/07/2024	Michael Palestina	2.9	Aimmune Therapeutics	CLAS	Class cert work, discovery responses
03/08/2024	Gina Palermo	3.4	Aimmune Therapeutics	DISC	Research for and drafting responses to requests for admission.
03/08/2024	Rhosean Scott	3.5	Aimmune Therapeutics	DCDR	Review communications from MP and GP re request for admissions. Pull related documents and provide relevant information in support of responses.
03/08/2024	Rhosean Scott	4.4	Aimmune Therapeutics	LITI	Review Bjerkholt and Oxtoby depositions for key testimony; update summary of exhibits and relevant testimony.
03/08/2024	Michael Palestina	2.8	Aimmune Therapeutics	CLAS	Class cert filing, discovery responses
03/10/2024	Michael Palestina	6.2	Aimmune Therapeutics	LITI	Demand review, discovery responses
03/11/2024	Gina Palermo	2.5	Aimmune Therapeutics	DISC	Draft and edit document list for discovery responses. Add additional documents to timeline. Emails with Mr. Palestina re: same.
03/11/2024	Rhosean Scott	7.7	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/11/2024	Michael Palestina	1.6	Aimmune Therapeutics	LITI	Discovery responses, calls and corresp
03/12/2024	Gina Palermo	0.4	Aimmune Therapeutics	DISC	Draft client declarations for discovery responses.
03/12/2024	Gina Palermo	0.9	Aimmune Therapeutics	DISC	Revise document list for discovery responses and send to co-counsel.
03/12/2024	Rhosean Scott	8.4	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/12/2024	Michael Palestina	3.8	Aimmune Therapeutics	LITI	Discovery response work, corresp and call with client, corresp re: exhibits re: numbers
03/13/2024	Rhosean Scott	8.1	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/13/2024	Michael Palestina	1.5	Aimmune Therapeutics	LITI	Discovery response work, exhibit number issues.
03/14/2024	Gina Palermo	4.3	Aimmune Therapeutics	DISC	Revise client verifications. Review and revise draft interrogatory responses. Review and revise list of documents in interrogatory responses.
03/14/2024	Gina Palermo	1.5	Aimmune Therapeutics	DISC	Assist with correcting deposition exhibit numbers. Emails among co-counsel regarding same.
03/14/2024	Gina Palermo	5.5	Aimmune Therapeutics	LITI	Legal research re: excluding post-merger evidence
03/14/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/14/2024	Michael Palestina	0.3	Aimmune Therapeutics	DISC	Discovery edits correspondence
03/15/2024	Rhosean Scott	6.8	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/17/2024	Michael Palestina	1.8	Aimmune Therapeutics	DISC	Discovery edits
03/18/2024	Rhosean Scott	5	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/18/2024	Michael Palestina	6.2	Aimmune Therapeutics	DISC	Finalize discovery, triage defense responses
03/19/2024	Rhosean Scott	8.4	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/20/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review Oxtoby deposition for key testimony; update summary of exhibits and relevant testimony.
03/21/2024	Rhosean Scott	7	Aimmune Therapeutics	LITI	Review Oxtoby and Behar depositions for key testimony; update summary of exhibits and relevant testimony.
03/22/2024	Rhosean Scott	8.4	Aimmune Therapeutics	LITI	Review Behar deposition for key testimony; update summary of exhibits and relevant testimony.
03/22/2024	Michael Palestina	4.2	Aimmune Therapeutics	DISC	Review discovery responses and create follow up list



Bill Date	Staff	Duration	Case	Code	Description
03/25/2024	Gina Palermo	3.4	Aimmune Therapeutics	DISC	Participate in call with opposing counsel re: discovery disputes. Revise discovery responses. Multiple emails among co-counsel re: same.
03/25/2024	Gina Palermo	3.3	Aimmune Therapeutics	DISC	Begin drafting motion to compel discovery responses.
03/25/2024	Rhosean Scott	7.2	Aimmune Therapeutics	LITI	Review Behar deposition for key testimony; update summary of exhibits and relevant testimony.
03/25/2024	Rhosean Scott	0.2	Aimmune Therapeutics	DCDR	Pull LE forecast document for GP.
03/25/2024	Michael Palestina	2	Aimmune Therapeutics	LITI	Meet and confer and revise responses
03/26/2024	Rhosean Scott	8.3	Aimmune Therapeutics	LITI	Review Behar deposition for key testimony; update summary of exhibits and relevant testimony.
03/27/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review Behar deposition for key testimony; update summary of exhibits and relevant testimony.
03/28/2024	Gina Palermo	3.3	Aimmune Therapeutics	LITI	Research re: damages, evidence post-close.
03/28/2024	Rhosean Scott	7.2	Aimmune Therapeutics	LITI	Review Behar deposition for key testimony; update summary of exhibits and relevant testimony.
03/29/2024	Gina Palermo	3.2	Aimmune Therapeutics	LITI	Research re damages, post-close evidence.
03/29/2024	Rhosean Scott	7.1	Aimmune Therapeutics	LITI	Review Behar deposition for key testimony; update summary of exhibits and relevant testimony.
03/29/2024	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Discovery response supplement
03/30/2024	Rhosean Scott	0.9	Aimmune Therapeutics	DCDR	Review Behar deposition for key testimony; update summary of exhibits and relevant testimony.
04/01/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Greenblatt deposition for key testimony; update summary of exhibits and relevant testimony.
04/02/2024	Rhosean Scott	8.5	Aimmune Therapeutics	LITI	Review Greenblatt deposition for key testimony; update summary of exhibits and relevant testimony.
04/02/2024	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Corresp re: Defs responses, review
04/03/2024	Rhosean Scott	8.3	Aimmune Therapeutics	LITI	Review Greenblatt deposition for key testimony; update summary of exhibits and relevant testimony.
04/03/2024	Rhosean Scott	0.1	Aimmune Therapeutics	DCDR	Review communication from MP re reproduction of documents.
04/04/2024	Gina Palermo	4	Aimmune Therapeutics	LITI	Research re damages, post-merger evidence. Draft memo re: same.
04/04/2024	Rhosean Scott	7.8	Aimmune Therapeutics	LITI	Review Greenblatt and Enright depositions for key testimony; update summary of exhibits and relevant testimony.
04/05/2024	Rhosean Scott	7.5	Aimmune Therapeutics	LITI	Review Enright deposition for key testimony; update summary of exhibits and relevant testimony.
04/07/2024	Rhosean Scott	0.3	Aimmune Therapeutics	DCDR	Review reproduction and update timeline.
04/08/2024	Rhosean Scott	0.1	Aimmune Therapeutics	DCDR	Communication with SY re reproduction.
04/08/2024	Rhosean Scott	8.5	Aimmune Therapeutics	LITI	Review Enright deposition for key testimony; update summary of exhibits and relevant testimony. Related communication with MP.
04/08/2024	Michael Palestina	1.1	Aimmune Therapeutics	LITI	Re-review supplemental discovery responses
04/09/2024	Rhosean Scott	7	Aimmune Therapeutics	LITI	Review Enright deposition for key testimony; update summary of exhibits and relevant testimony.
04/10/2024	Rhosean Scott	8.5	Aimmune Therapeutics	LITI	Review Enright and Seltzer depositions for key testimony; update summary of exhibits and relevant testimony.
04/11/2024	Rhosean Scott	7.5	Aimmune Therapeutics	DCDR	Review Seltzer deposition for key testimony; update summary of exhibits and relevant testimony.
04/12/2024	Rhosean Scott	8	Aimmune Therapeutics	DCDR	Review Seltzer and Theissen depositions for key testimony; update summary of exhibits and relevant testimony.
04/13/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Set up second prep
04/14/2024	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corresp re: expert depo
04/15/2024	Gina Palermo	1.6	Aimmune Therapeutics	EXPT	Review and annotate expert report of Paul Gompers
04/15/2024	Rhosean Scott	6.7	Aimmune Therapeutics	LITI	Review Theissen deposition for key testimony; update summary of exhibits and relevant testimony.
04/16/2024	Gina Palermo	1	Aimmune Therapeutics	EXPT	Begin research on Paul Gompers for depo prep.
04/16/2024	Rhosean Scott	2.5	Aimmune Therapeutics	LITI	Review Theissen deposition for key testimony; update summary of exhibits and relevant testimony.
04/16/2024	Michael Palestina	7.5	Aimmune Therapeutics	EXPT	Expert depo prep, expert report review
04/17/2024	Gina Palermo	2.5	Aimmune Therapeutics	EXPT	Research re: Paul Gompers to prep for deposition.
04/17/2024	Brian Mears	1	Aimmune Therapeutics	CLAS	Review class cert memo
04/17/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review Theissen deposition for key testimony; update summary of exhibits and relevant testimony.

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04/18/2024	Gina Palermo	4.5	Aimmune Therapeutics	EXPT	Research re prior work of Gompers.
04/18/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Theissen/Kingston depositions for key testimony; update summary of exhibits and relevant testimony.
04/19/2024	Gina Palermo	4.2	Aimmune Therapeutics	EXPT	Research re Gompers prior work.
04/19/2024	Rhosean Scott	7.9	Aimmune Therapeutics	LITI	Review Kingston deposition for key testimony; update summary of exhibits and relevant testimony.
04/22/2024	Gina Palermo	6.5	Aimmune Therapeutics	EXPT	Research and memo re: Gompers prior testimony.
04/22/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Kingston deposition for key testimony; update summary of exhibits and relevant testimony.
04/22/2024	Michael Palestina	2.2	Aimmune Therapeutics	EXPT	Expert prep, expert depo prep
04/23/2024	Gina Palermo	7	Aimmune Therapeutics	LITI	Observe deposition of Bill Jeffers.
04/23/2024	Brian Mears	7	Aimmune Therapeutics	LITI	Depo of Jeffers (all day)
04/23/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review Kingston deposition for key testimony; update summary of exhibits and relevant testimony.
04/23/2024	Michael Palestina	6	Aimmune Therapeutics	DISC	Listen to depo, prep for defs expert depo
04/24/2024	Rhosean Scott	8.5	Aimmune Therapeutics	LITI	Review Kingston deposition for key testimony; update summary of exhibits and relevant testimony.
04/25/2024	Rhosean Scott	7	Aimmune Therapeutics	LITI	Review Kingston/Akhawat depositions for key testimony; update summary of exhibits and relevant testimony.
04/29/2024	Rhosean Scott	7.9	Aimmune Therapeutics	LITI	Review Akhawat deposition for key testimony; update summary of exhibits and relevant testimony.
04/30/2024	Rhosean Scott	8.5	Aimmune Therapeutics	LITI	Review Akhawat deposition for key testimony; update summary of exhibits and relevant testimony.
04/30/2024	Michael Palestina	8.7	Aimmune Therapeutics	EXPT	Expert depo prep
05/01/2024	Gina Palermo	2.3	Aimmune Therapeutics	EXPT	Additional research re prior Gompers opinions. Email re: same to Mr. Palestina. Review Gompers depo outline.
05/01/2024	Gina Palermo	4.5	Aimmune Therapeutics	LITI	Legal research and drafting motion in limine to exclude post-close evidence.
05/01/2024	Rhosean Scott	7.2	Aimmune Therapeutics	LITI	Review Akhawat/Pemberton deposition for key testimony; update summary of exhibits and relevant testimony.
05/01/2024	Rhosean Scott	0.8	Aimmune Therapeutics	LITI	Review and pull supporting depo citations for MP.
05/01/2024	Michael Palestina	7.4	Aimmune Therapeutics	DISC	Complete depo prep and circulate
05/02/2024	Gina Palermo	7	Aimmune Therapeutics	LITI	Draft motion in limine re: damages and post-close evidence of performance
05/02/2024	Rhosean Scott	5.3	Aimmune Therapeutics	LITI	Review Pemberton deposition for key testimony.
05/03/2024	Gina Palermo	3.8	Aimmune Therapeutics	LITI	draft motion in limine re: damages and post-close evidence. Send draft to Mr. Palestina.
05/03/2024	Rhosean Scott	8.9	Aimmune Therapeutics	LITI	Review Pemberton deposition for key testimony.
05/03/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call re: depo prep
05/04/2024	Rhosean Scott	1.3	Aimmune Therapeutics	LITI	Review Svitak deposition for key testimony.
05/06/2024	Rhosean Scott	0.3	Aimmune Therapeutics	LITI	Communications with MP re depo testimony and exhibit summary; related communication with co-counsel re transcripts.
05/06/2024	Rhosean Scott	7.3	Aimmune Therapeutics	LITI	Review Svitak deposition for key testimony. Update summary of exhibits with Pemberton testimony.
05/07/2024	Gina Palermo	4	Aimmune Therapeutics	EXPT	Observe deposition of Dr. Gompers.
05/07/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Save final versions of transcripts. Revise summary of exhibits and update authentication notations; related call with MP.
05/07/2024	Michael Palestina	4.6	Aimmune Therapeutics	EXPT	Expert depo
05/13/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call re: mediation and follow up
05/14/2024	Gina Palermo	0.3	Aimmune Therapeutics	LITI	Emails among co-counsel re: insurance limits and mediation strategy.
05/14/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corresp re: mediation
05/16/2024	Rhosean Scott	8.5	Aimmune Therapeutics	LITI	Review Adelman deposition for key testimony; update summary of exhibits and relevant testimony.
05/17/2024	Rhosean Scott	8.3	Aimmune Therapeutics	LITI	Review Adelman deposition for key testimony; update summary of exhibits and relevant testimony.
05/19/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Review and edit reply
05/20/2024	Gina Palermo	5.5	Aimmune Therapeutics	LITI	Legal research for MJS, Daubert and limine motions. Collect samples re: same. Work on motion in limine re: damages/post-merger evidence.

Bill Date	Staff	Duration	Case	Code	Description
05/20/2024	Rhosean Scott	7.8	Aimmune Therapeutics	LITI	Review Adelman deposition for key testimony; update summary of exhibits and relevant testimony.
05/21/2024	Gina Palermo	1.5	Aimmune Therapeutics	LITI	Draft motion in limine re: damages/post close merger. Discuss various motions with Mr. Palestina.
05/21/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Adelman deposition for key testimony; update summary of exhibits and relevant testimony. Communication with MP and GP re depo transcripts.
05/21/2024	Michael Palestina	4.9	Aimmune Therapeutics	LITI	Motion summary judgment outline and work
05/22/2024	Gina Palermo	5	Aimmune Therapeutics	LITI	Draft motion in limine re damages and Daubert motion re: Gompers.
05/22/2024	Rhosean Scott	8.5	Aimmune Therapeutics	LITI	Review Adelman deposition for key testimony; update summary of exhibits and relevant testimony.
05/22/2024	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Call re: mediation
05/23/2024	Gina Palermo	6	Aimmune Therapeutics	LITI	Draft motion in limine re post-close evidence and Daubert motion re: Gompers.
05/23/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Review Adelman/Falberg depositions for key testimony; update summary of exhibits and relevant testimony. Communication with GP re Jeffers transcript.
05/24/2024	Gina Palermo	5	Aimmune Therapeutics	EXPT	Draft Daubert motion re: Gompers
05/24/2024	Rhosean Scott	3.1	Aimmune Therapeutics	LITI	Review Falberg deposition for key testimony; update summary of exhibits and relevant testimony.
05/27/2024	Gina Palermo	7	Aimmune Therapeutics	EXPT	Draft Daubert motion to limit Gompers.
05/27/2024	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Communications w/MP re status of exhibit summary and depo transcripts.
05/28/2024	Gina Palermo	5	Aimmune Therapeutics	EXPT	Draft Daubert motion to limit Gompers
05/28/2024	Rhosean Scott	7.7	Aimmune Therapeutics	LITI	Review Falberg/Gompers deposition for key testimony; update summary of exhibits and relevant testimony.
05/29/2024	Gina Palermo	5.4	Aimmune Therapeutics	LITI	Legal research for partial MSJ re: materiality; draft insert for PMSJ.
05/29/2024	Rhosean Scott	8.4	Aimmune Therapeutics	LITI	Review Gompers/Jeffers deposition for key testimony; update summary of exhibits and relevant testimony. Review communication from co-counsel re Jeffers transcript.
05/30/2024	Gina Palermo	7.2	Aimmune Therapeutics	LITI	Legal research and draft inserts for PMSJ. Send same to Mr. Palestina. Continue editing Gompers Daubert motion.
05/30/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review Jeffers deposition for key testimony; update summary of exhibits and relevant testimony. Related communication with MP.
05/30/2024	Michael Palestina	6.3	Aimmune Therapeutics	DISP	Daubert Edits and review
05/31/2024	Gina Palermo	6.2	Aimmune Therapeutics	LITI	Revise PMSJ and Daubert motion.
05/31/2024	Rhosean Scott	5.5	Aimmune Therapeutics	LITI	Review Jeffers deposition for key testimony; update summary of exhibits and relevant testimony.
05/31/2024	Rhosean Scott	1.2	Aimmune Therapeutics	LITI	Review communications from GP re citations for MSJ brief; perform related searches for supporting testimony.
05/31/2024	Michael Palestina	6.3	Aimmune Therapeutics	DISP	Finalize and circulate MTL and Dauberts
06/03/2024	Rhosean Scott	9.1	Aimmune Therapeutics	LITI	Review Jeffers deposition for key testimony; update summary of exhibits and relevant testimony.
06/03/2024	Michael Palestina	0.6	Aimmune Therapeutics	LITI	MSJ work
06/04/2024	Rhosean Scott	7.7	Aimmune Therapeutics	LITI	Review Jeffers deposition for key testimony; update summary of exhibits and relevant testimony. Related communication with MP.
06/04/2024	Michael Palestina	2	Aimmune Therapeutics	LITI	MSJ work
06/05/2024	Rhosean Scott	7.4	Aimmune Therapeutics	LITI	Review Jeffers deposition for key testimony; update summary of exhibits and relevant testimony.
06/05/2024	Michael Palestina	3.9	Aimmune Therapeutics	LITI	MSJ work
06/06/2024	Rhosean Scott	9.7	Aimmune Therapeutics	LITI	Review Hendrix deposition for key testimony; update summary of exhibits and relevant testimony.
06/06/2024	Michael Palestina	4.6	Aimmune Therapeutics	LITI	MSJ work
06/07/2024	Rhosean Scott	6.5	Aimmune Therapeutics	LITI	Review Hendrix/McDade depositions for key testimony; update summary of exhibits and relevant testimony. Related communication with MP.
06/08/2024	Michael Palestina	2.5	Aimmune Therapeutics	LITI	MSJ work
06/10/2024	Gina Palermo	0.8	Aimmune Therapeutics	LITI	Legal research for PMSJ

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06/10/2024	Rhosean Scott	0.3	Aimmune Therapeutics	LITI	Review depo transcripts for certifications; related communication with MP.
06/10/2024	Michael Palestina	6.3	Aimmune Therapeutics	LITI	MSJ work, call re: same
06/11/2024	Gina Palermo	3	Aimmune Therapeutics	DISP	Legal research re PMSJ. Organize exhibits for PMSJ. Draft table of defined terms for PMSJ.
06/11/2024	Michael Palestina	9.2	Aimmune Therapeutics	LITI	MPSJ work
06/12/2024	Brian Mears	2.5	Aimmune Therapeutics	LITI	Juan affidavit exhibit work
06/12/2024	Gina Palermo	9.8	Aimmune Therapeutics	DISP	Check all factual assertions and citations in PMSJ brief. Redline same.
06/12/2024	Michael Palestina	10.6	Aimmune Therapeutics	DISP	MPSJ and Daubert work
06/13/2024	Gina Palermo	9	Aimmune Therapeutics	DISP	Finish fact-checking PMSJ. Fact-check Daubert motion. Draft Daubert motion declaration. Organize all Daubert exhibits.
06/13/2024	Brian Mears	8	Aimmune Therapeutics	LITI	Edits / cite check / exhibit work for MSJ and Daubert
06/13/2024	Rhosean Scott	1.5	Aimmune Therapeutics	LITI	Communications with case team & co-counsel re Gompers/Jeffers exhibits; related communication with Esquire/Veritext. Review exhibits for marked copies in preparation for MSJ.
06/13/2024	Michael Palestina	11.8	Aimmune Therapeutics	DISP	Finalize MPSJ and Daubert
06/14/2024	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Review communications from MP and co-counsel re filings.
06/14/2024	Michael Palestina	3.6	Aimmune Therapeutics	LITI	final paper reads and edits
06/17/2024	Gina Palermo	1.2	Aimmune Therapeutics	DISP	Review Defendants' MSJ and Daubert motions. Review emails among co-counsel re: same.
06/17/2024	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Review communication from MP re exhibit summary and MSJ filing.
06/17/2024	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Call and corresp re: filings
06/18/2024	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Call re: strategy
06/24/2024	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Client update
07/01/2024	Rhosean Scott	7.6	Aimmune Therapeutics	LITI	Review timeline and update with introduced depo exhibits; begin draft of trial exhibit list.
07/02/2024	Rhosean Scott	7.7	Aimmune Therapeutics	LITI	Begin draft of trial exhibit list.
07/08/2024	Rhosean Scott	7.4	Aimmune Therapeutics	LITI	Review Defs. Daubert Motion and Jeffers Expert Report; related communication with MP and BM.
07/08/2024	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Revise and edit status report
07/09/2024	Rhosean Scott	6.7	Aimmune Therapeutics	LITI	Review Jeffers Depo.
07/10/2024	Rhosean Scott	8	Aimmune Therapeutics	LITI	Review Jeffers Depo and Gompers Report.
07/11/2024	Rhosean Scott	8.4	Aimmune Therapeutics	LITI	Review Gompers Report and Depo.
07/12/2024	Rhosean Scott	7.6	Aimmune Therapeutics	LITI	Review Gompers Depo; prepare notes on rebuttal to Def.'s Daubert motion.
07/15/2024	Gina Palermo	0.3	Aimmune Therapeutics	LITI	Review edits to memo to court by defendants amd emails among co-counsel re same.
07/15/2024	Gina Palermo	0.3	Aimmune Therapeutics	LITI	Review draft of opposition to Jeffers Daubert motion.
07/15/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Prepare notes on rebuttal to Def.'s Daubert motion; review related documents.
07/16/2024	Rhosean Scott	7.6	Aimmune Therapeutics	LITI	Prepare notes on rebuttal to Def.'s Daubert motion; review related documents.
07/16/2024	Michael Palestina	1.2	Aimmune Therapeutics	LITI	MSJ opp work, comm re: status update
07/17/2024	Rhosean Scott	5.3	Aimmune Therapeutics	LITI	Prepare notes on rebuttal to Def.'s Daubert motion; review related documents.
07/17/2024	Michael Palestina	5.5	Aimmune Therapeutics	LITI	Corresp re: costs, msj Opp work
07/18/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Prepare notes on rebuttal to Def.'s Daubert motion; review related documents. Related communication with GP.
07/18/2024	Gina Palermo	6	Aimmune Therapeutics	EXPT	Draft opposition to Daubert motion.
07/18/2024	Michael Palestina	7.9	Aimmune Therapeutics	LITI	Call re: docs
07/19/2024	Gina Palermo	5.4	Aimmune Therapeutics	EXPT	Draft opposition to Daubert motion.
07/19/2024	Michael Palestina	6.8	Aimmune Therapeutics	LITI	MSJ opp
07/22/2024	Gina Palermo	9	Aimmune Therapeutics	EXPT	Draft opposition to Daubert motion.
07/22/2024	Rhosean Scott	1.4	Aimmune Therapeutics	LITI	Communication with MP re Daubert motion; review depositions for supportive testimony.

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07/22/2024	Michael Palestina	7.2	Aimmune Therapeutics	DISP	Edit and circulate MSJ opp
07/23/2024	Gina Palermo	8.8	Aimmune Therapeutics	EXPT	Draft and revise opposition to Daubert motion.
07/24/2024	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Daubert work
07/25/2024	Michael Palestina	7.1	Aimmune Therapeutics	DISP	Daubert Opp, call with defense counsel
07/26/2024	Gina Palermo	2.4	Aimmune Therapeutics	EXPT	Make revisions and add citations to Daubert opposition. Emails with Mr. Palestina re: same.
07/26/2024	Michael Palestina	8.8	Aimmune Therapeutics	DISP	Daubert Opp, status conference with court
07/29/2024	Michael Palestina	8.4	Aimmune Therapeutics	DISP	MTD OPP edits
07/30/2024	Gina Palermo	0.6	Aimmune Therapeutics	LITI	Multiple emails among co-counsel re: revisions to MSJ Opp.
07/30/2024	Michael Palestina	10.1	Aimmune Therapeutics	DISP	MSJ Opp Work
07/31/2024	Gina Palermo	9.5	Aimmune Therapeutics	DISP	Edit, cite check, and law check opposition to MSJ.
07/31/2024	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Review communications from MP and GP re Opp to MSJ/Daubert motions.
07/31/2024	Michael Palestina	11.6	Aimmune Therapeutics	DISP	MSJ opp, Daubert Opp
08/01/2024	Gina Palermo	4	Aimmune Therapeutics	DISP	Edit, cite check and law check MSJ opposition. Draft and revise attorney affidavit re: same.
08/01/2024	Gina Palermo	6.2	Aimmune Therapeutics	EXPT	Edit, cite check and law check opposition to Daubert motion.
08/01/2024	Rhosean Scott	4.3	Aimmune Therapeutics	LITI	Review communications from GP and MP re P's Opp to MSJ; search for relevant testimony, pull new exhibits and depositions, and update supporting declaration.
08/01/2024	Michael Palestina	4.8	Aimmune Therapeutics	DISP	Final work on Daubert and MSJ opp
08/02/2024	Gina Palermo	7.8	Aimmune Therapeutics	EXPT	Edit, cite check and law check opposition to Daubert motion. Draft attorney affidavit re: same.
08/02/2024	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Review communications from GP and MP re P's Opp to Daubert motion; pull new depositions and exhibits, and provide related authentication.
08/02/2024	Michael Palestina	2.2	Aimmune Therapeutics	DISP	Corresp re: Daubert, review and circulate
08/04/2024	Michael Palestina	1.3	Aimmune Therapeutics	DISP	Daubert work
08/05/2024	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Emails re: exhibits. Final research re: msj opposition. Multiple phone call with co-counsel re: filings and exhibits
08/05/2024	Rhosean Scott	5.7	Aimmune Therapeutics	LITI	Review communication from MP re MSJ and Daubert memos. Pull related documents and annotate depositions cited in MSJ/Daubert memos.
08/06/2024	Gina Palermo	0.5	Aimmune Therapeutics	LITI	Review Defendants Opposition to Plaintiffs' MSJ.
08/06/2024	Gina Palermo	0.4	Aimmune Therapeutics	DISP	Emails among co-counsel re: annotated exhibits for court.
08/06/2024	Rhosean Scott	7.4	Aimmune Therapeutics	LITI	Annotate depositions cited in our MSJ/Daubert memos.
08/06/2024	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Review communications from GP re Daubert exhibits and Defs. Opp. to MPSJ. Annotate depositions cited in our MSJ/Daubert memos.
08/07/2024	Rhosean Scott	7.4	Aimmune Therapeutics	LITI	Annotate depositions cited in our MSJ/Daubert memos.
08/08/2024	Gina Palermo	0.6	Aimmune Therapeutics	DISP	Emails among co-counsel re: modifying filings for confidential information. Review rules re: same.
08/08/2024	Rhosean Scott	8.2	Aimmune Therapeutics	LITI	Annotate depositions and exhibits cited in our MSJ/Daubert memos.
08/09/2024	Rhosean Scott	8.3	Aimmune Therapeutics	LITI	Annotate exhibits cited in our MSJ/Daubert memos.
08/09/2024	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Triage opp
08/12/2024	Rhosean Scott	7.7	Aimmune Therapeutics	LITI	Annotate exhibits cited in our MSJ/Daubert memos.
08/12/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corres re: files
08/13/2024	Rhosean Scott	7.2	Aimmune Therapeutics	LITI	Annotate exhibits cited in our MSJ/Daubert memos.
08/14/2024	Rhosean Scott	9.2	Aimmune Therapeutics	LITI	Annotate exhibits cited in our MSJ/Daubert memos.
08/15/2024	Rhosean Scott	2.4	Aimmune Therapeutics	DCDR	Annotate exhibits cited in our MSJ/Daubert memos; related communication with GP.
08/16/2024	Gina Palermo	0.9	Aimmune Therapeutics	LITI	Assist with annotated exhibit project. Emails with Rhosean re: same.
08/16/2024	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Mediation schedule

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08/19/2024	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Communication with GP and MP re annotated depos and exhibits.
08/24/2024	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Calls and corresp re mediation
08/25/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Mediation corresp
08/26/2024	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Corresp re: mediation, call
08/29/2024	Rhosean Scott	1.1	Aimmune Therapeutics	LITI	Organize exhibits and depositions cited in MPSJ and Opp to MSJ in preparation for mediation.
08/30/2024	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Communications with MP and Matt Graner (Monteverde) re depo transcripts for mediation.
09/04/2024	Gina Palermo	3.8	Aimmune Therapeutics	EXPT	Begin drafting reply memorandum re: Gompers Daubert
09/05/2024	Gina Palermo	7.8	Aimmune Therapeutics	EXPT	Draft Daubert reply memo re: Gmpers
09/06/2024	Gina Palermo	3.5	Aimmune Therapeutics	EXPT	Draft Daubert reply. Revise same.
09/11/2024	Michael Palestina	4.1	Aimmune Therapeutics	DISP	Daubert opp
09/12/2024	Michael Palestina	2.6	Aimmune Therapeutics	DISP	Daubert reply
09/13/2024	Gina Palermo	0.2	Aimmune Therapeutics	EXPT	Discuss Daubert reply memo with Mr. Palestina.
09/13/2024	Gina Palermo	2.2	Aimmune Therapeutics	EXPT	Edit Daubert reply memo.
09/13/2024	Michael Palestina	3.7	Aimmune Therapeutics	DISP	Daubert reply work
09/14/2024	Gina Palermo	1.8	Aimmune Therapeutics	EXPT	Edit Daubert reply memo.
09/15/2024	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Communication with MP re annotated depos and exhibits.
09/15/2024	Michael Palestina	2.1	Aimmune Therapeutics	DISP	Daubert reply, edit mediation sheet
09/16/2024	Gina Palermo	2.2	Aimmune Therapeutics	EXPT	Draft declaration in support of Daubert reply. Multiple emails with co-counsel re: same. Edits to same.
09/16/2024	Michael Palestina	7.3	Aimmune Therapeutics	LITI	Motion summary judgment opp
09/17/2024	Gina Palermo	0.3	Aimmune Therapeutics	EXPT	Revise attorney declaration for Daubert motion. Send to co-counsel.
09/17/2024	Gina Palermo	4.3	Aimmune Therapeutics	DISP	Fact-check MPSJ reply memo. Draft attorney declaration for reply memo. Send to co-counsel.
09/17/2024	Michael Palestina	11.2	Aimmune Therapeutics	DISP	MSJ and Daubert Reply work, edit mediation statement
09/18/2024	Michael Palestina	4.8	Aimmune Therapeutics	LITI	Exhibits and PP work
09/19/2024	Gina Palermo	0.4	Aimmune Therapeutics	EXPT	Final review of reply memo. Additional edits to same.
09/19/2024	Michael Palestina	8.5	Aimmune Therapeutics	LITI	Exhibit and PP work, reply work
09/20/2024	Rhosean Scott	6.6	Aimmune Therapeutics	DCDR	Review exhibits/depos cited in PMSJ/Daubert reply briefs, and update annotations in preparation for mediation.
09/20/2024	Michael Palestina	2.2	Aimmune Therapeutics	LITI	Courtesy copies of exhibit, call with mediator, call w client
09/22/2024	Michael Palestina	1.6	Aimmune Therapeutics	LITI	PP edits and mediation prep
09/23/2024	Brian Mears	5.5	Aimmune Therapeutics	TRVL	Travel to NYC mediation
09/23/2024	Brian Mears	3.5	Aimmune Therapeutics	LITI	Review msj pleadings / mediation statement
09/23/2024	Michael Palestina	6.6	Aimmune Therapeutics	TRVL	Travel and prep for mediation
09/24/2024	Rhosean Scott	0.2	Aimmune Therapeutics	LITI	Communications with MP and co-counsel re courtesy copy of MSJ/Daubert exhibits.
09/24/2024	Brian Mears	6	Aimmune Therapeutics	LITI	Mediation
09/24/2024	Michael Palestina	6	Aimmune Therapeutics	LITI	Mediation
09/25/2024	Brian Mears	5.5	Aimmune Therapeutics	TRVL	Return from NYC mediation
09/25/2024	Michael Palestina	5	Aimmune Therapeutics	TRVL	Return travel
09/30/2024	Michael Palestina	1	Aimmune Therapeutics	LITI	Flight, hotel, email info to Defense counsel
10/01/2024	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: upcoming trial deadlines
10/02/2024	Gina Palermo	0.5	Aimmune Therapeutics	DISP	Assist in prep for MSJ hearing. Emails re: same.
10/02/2024	Rhosean Scott	0.4	Aimmune Therapeutics	DCDR	Review communication from MP/co-counsel and relevant MPSJ exhibits; related communication with GP.
10/02/2024	Michael Palestina	2	Aimmune Therapeutics	LITI	Hearing prep
10/07/2024	Gina Palermo	0.8	Aimmune Therapeutics	LITI	Review jury instructions and voir dire questions and emails re: same.

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10/07/2024	Michael Palestina	2.1	Aimmune Therapeutics	LITI	Review and edit jury instructions and voir dire questions, update deadlines and client, hotel and flight charges
10/08/2024	Brian Mears	0.5	Aimmune Therapeutics	LITI	Review emails re pre trial
10/08/2024	Michael Palestina	0.7	Aimmune Therapeutics	LITI	Meet and confer with defs, prep and follow up.
10/10/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call re: case
10/16/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call re: hotel block
10/17/2024	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: hotels
10/22/2024	Gina Palermo	0.4	Aimmune Therapeutics	LITI	Emails with co-counsel re: witness subpoenas.
10/22/2024	Gina Palermo	0.5	Aimmune Therapeutics	LITI	Draft proposed stipulated facts for trial
10/23/2024	Gina Palermo	4.5	Aimmune Therapeutics	LITI	Draft proposed trial stipulations. Review key case documents re: same.
10/23/2024	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: assignments with Grass and mediation with mediation
10/24/2024	Gina Palermo	3.2	Aimmune Therapeutics	LITI	Draft pre-trial stipulation for exhibits. Review exhibit list. Edits to motion in limine re: post-merger evidence.
10/25/2024	Gina Palermo	5.6	Aimmune Therapeutics	LITI	Draft witness list. Edit MIL re post-merger evidence. Draft stipulation as to admissibility.
10/25/2024	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Corresp follow up re: pretrial submissions
10/28/2024	Gina Palermo	4.7	Aimmune Therapeutics	LITI	Review/edit proposed jury charges. Review/edit proposed voir dire questions.
10/28/2024	Michael Palestina	5.6	Aimmune Therapeutics	LITI	Hearing prep
10/29/2024	Gina Palermo	7.8	Aimmune Therapeutics	LITI	Draft motions in limine.
10/29/2024	Rhosean Scott	0.1	Aimmune Therapeutics	LITI	Communication with MP re trial exhibit list.
10/29/2024	Michael Palestina	7.2	Aimmune Therapeutics	LITI	Hearing prep, review and edit pre-trial submissions
10/30/2024	Gina Palermo	5	Aimmune Therapeutics	LITI	Draft various motions in limine. Research re: same.
10/30/2024	Michael Palestina	5.7	Aimmune Therapeutics	LITI	Hearing prep and docs to preparer(illegible) calls and corres re: settlement
10/31/2024	Michael Palestina	3.1	Aimmune Therapeutics	LITI	Hearing prep, multi calls and corresp, continuance
11/01/2024	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Cecelia Client update
11/07/2024	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Work on motions in limine
11/07/2024	Michael Palestina	2.3	Aimmune Therapeutics	LITI	Multi calls and corresp re: settlement hearing, prep to travel
11/14/2024	Michael Palestina	3.3	Aimmune Therapeutics	LITI	Review and edit stipulation of settlement
11/15/2024	Gina Palermo	0.4	Aimmune Therapeutics	LITI	Review stipulation of settlement and emails among cocounsel re: same.
11/15/2024	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Corresp re: settlement stip
11/21/2024	Michael Palestina	2.6	Aimmune Therapeutics	LITI	Edits to ancillary docs
11/22/2024	Rhosean Scott	0.4	Aimmune Therapeutics	DCDR	Review communication from MP re invoice for mediation services; prepare related check request.
11/22/2024	Michael Palestina	0.9	Aimmune Therapeutics	LITI	Corresp and review ancillary docs
11/26/2024	Gina Palermo	4.2	Aimmune Therapeutics	LITI	Draft motion and memo for preliminary approval of settlement
11/27/2024	Gina Palermo	1.8	Aimmune Therapeutics	LITI	Draft motion for preliminary approval
12/02/2024	Gina Palermo	7.4	Aimmune Therapeutics	LITI	Draft motion for preliminary approval
12/03/2024	Gina Palermo	4.2	Aimmune Therapeutics	LITI	Draft motion for preliminary approval
12/04/2024	Gina Palermo	4.6	Aimmune Therapeutics	LITI	Review stipulation of settlement and all exhibits. Continue drafting motion for preliminary approval
12/04/2024	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Corresp re: stipulation and prelim papers
12/05/2024	Gina Palermo	6	Aimmune Therapeutics	LITI	Draft and edit preliminary approval memo
12/06/2024	Gina Palermo	3.8	Aimmune Therapeutics	LITI	Draft/edit preliminary approval memo
12/09/2024	Gina Palermo	3.3	Aimmune Therapeutics	LITI	Complete draft of motion for preliminary approval
12/11/2024	Michael Palestina	3.1	Aimmune Therapeutics	LITI	Review and edit stipulation and ancillary documents
12/12/2024	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Corresp re: prelim papers, call re: same
12/16/2024	Gina Palermo	0.5	Aimmune Therapeutics	LITI	Research re formatting for preliminary approval motion



Bill Date	Staff	Duration	Case	Code	Description
12/16/2024	Michael Palestina	6.1	Aimmune Therapeutics	LITI	Edits to and review brief
12/17/2024	Gina Palermo	4.5	Aimmune Therapeutics	LITI	Review edits to motion for preliminary approval and emails re: same. Make further edits to Motion. Draft declaration of Monteverde. Circulate.
12/17/2024	Michael Palestina	2.6	Aimmune Therapeutics	LITI	Edits to and review brief and ancillary docs
12/18/2024	Gina Palermo	4	Aimmune Therapeutics	LITI	Draft exhibits to motion for preliminary approval and fact check same. Emails re: same.
12/18/2024	Michael Palestina	2.5	Aimmune Therapeutics	LITI	Edits to motion for prelim approval
12/19/2024	Gina Palermo	5.5	Aimmune Therapeutics	LITI	Make revisions to motion for preliminary approval and attorney declaration. Fact check and law check motion.
12/19/2024	Michael Palestina	1	Aimmune Therapeutics	LITI	Calls and corresp re stip, edit docs
12/20/2024	Gina Palermo	1	Aimmune Therapeutics	LITI	Edits to motion for preliminary approval exhibits. Review multiple emails among co-counsel re: edits.
12/25/2024	Michael Palestina	2.1	Aimmune Therapeutics	LITI	Review stipulation edits and prelim approval edits
12/30/2024	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Review stipulation edits
01/03/2025	Gina Palermo	1	Aimmune Therapeutics	LITI	Emails among co-counsel re: preliminary approval papers and edits to same.
01/03/2025	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: prelim papers
01/06/2025	Michael Palestina	1.6	Aimmune Therapeutics	LITI	Review and edit prelim papers
01/14/2025	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corres with client
01/21/2025	Michael Palestina	0.4	Aimmune Therapeutics	LITI	Follow up invoice for mediation
02/27/2025	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Call re: hearing
02/28/2025	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Calendar deadlines
03/03/2025	Michael Palestina	0.2	Aimmune Therapeutics	LITI	Follow up from hearing
03/08/2025	Michael Palestina	0.1	Aimmune Therapeutics	LITI	Corresp re: schedule
03/09/2025	Michael Palestina	0.3	Aimmune Therapeutics	LITI	Corresp re: final papers
03/11/2025	Gina Palermo	0.5	Aimmune Therapeutics	LITI	Review emails re: final approval deadlines. Review and organize sample final approval and fee motions
03/11/2025	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Review and ok notice and schedule
03/12/2025	Gina Palermo	2.8	Aimmune Therapeutics	LITI	Begin drafting motion for attorneys fees and costs memo
03/13/2025	Gina Palermo	5.5	Aimmune Therapeutics	LITI	Draft motion for attorneys fees and costs
03/17/2025	Gina Palermo	1.5	Aimmune Therapeutics	LITI	Edit attorneys fees motion.
03/18/2025	Gina Palermo	5	Aimmune Therapeutics	LITI	Draft motion for final approval.
03/19/2025	Gina Palermo	6	Aimmune Therapeutics	LITI	Draft motion for final approval
03/20/2025	Gina Palermo	3	Aimmune Therapeutics	LITI	Draft and revise motion for final approval
04/16/2025	Michael Palestina	4.5	Aimmune Therapeutics	LITI	Fee brief work
04/17/2025	Michael Palestina	2.6	Aimmune Therapeutics	LITI	Fee brief work
04/18/2025	Michael Palestina	2.1	Aimmune Therapeutics	LITI	Fee brief work
04/21/2025	Michael Palestina	1.8	Aimmune Therapeutics	LITI	Review hearing transcript, calls and corresp re: same.
04/22/2025	Michael Palestina	0.8	Aimmune Therapeutics	LITI	Calls and corresp re: papers, call with Client
04/23/2025	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Research re: prior similar settlements/fee awards. Create chart. Emails with co-counsel re: same.
04/23/2025	Michael Palestina	0.6	Aimmune Therapeutics	LITI	Corresp re: Papers, edit client declaration
04/24/2025	Gina Palermo	2.5	Aimmune Therapeutics	LITI	Draft attorney declarations for motion for fees and expenses. Discuss same with Mr. Palestina.
04/25/2025	Gina Palermo	0.7	Aimmune Therapeutics	LITI	Research for attorney fee memo.
04/25/2025	Michael Palestina	0.5	Aimmune Therapeutics	LITI	Corresp and calls re: papers.
04/26/2025	Michael Palestina	4.9	Aimmune Therapeutics	LITI	Final Approval papers work
04/27/2025	Michael Palestina	9.6	Aimmune Therapeutics	LITI	Final approval papers work
04/28/2025	Gina Palermo	5	Aimmune Therapeutics	LITI	Edits, revisions and citations to fee brief and attorney declaration.



Bill Date	Staff	Duration	Case	Code	Description
04/28/2025	Michael Palestina	1.7	Aimmune Therapeutics	LITI	Edits to brief/declaration. Circulate
04/29/2025	Gina Palermo	0.4	Aimmune Therapeutics	LITI	Edits to citations of fee brief. Multiple emails among co-counsel re: edits to brief.
04/29/2025	Michael Palestina	2.2	Aimmune Therapeutics	LITI	Expenses and client follow up, edits to brief.
04/30/2025	Gina Palermo	6.5	Aimmune Therapeutics	LITI	Final review of brief. Legal cite check fee brief; update TOC and TOA; multiple discussions with paralegal re: same.
04/30/2025	Michael Palestina	3.3	Aimmune Therapeutics	STMT	Final review of brief and docs; docs to client

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*Counsel for Co-Lead Plaintiffs and  
Class Counsel*

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

IN RE AIMMUNE THERAPEUTICS, INC.  
SECURITIES LITIGATION

Master File No. 3:20-CV-06733-MMC

**[PROPOSED] ORDER  
AWARDING ATTORNEYS' FEES  
AND EXPENSES AND SERVICE  
AWARDS TO PLAINTIFFS**

1 WHEREAS, an action pending before this Court is styled *In Re: Aimmune Therapeutics,*  
2 *Inc. Securities Litigation*, 3:20-cv-06733-MMC (the “Action”);

3 WHEREAS, on March 7, 2025, the Court entered an Order: (i) preliminarily approving the  
4 Settlement and the proposed forms and methods of providing notice to the Class; (ii) providing  
5 Class Members with the opportunity to object to the Settlement, Class Counsel’s application of  
6 attorneys’ fees and expenses, and Plaintiffs’ application for service awards; and (iii) setting a  
7 hearing on final approval of the Settlement for July 18, 2025, at 9:00 a.m. (“Preliminary Approval  
8 Order”);

9 WHEREAS, the Court conducted a hearing on July 18, 2025 (“Fairness Hearing”) to  
10 consider, among other things: (i) whether Plaintiffs and Class Counsel have adequately represented  
11 the Class; (ii) whether the Settlement, on the terms and conditions provided for in the Stipulation  
12 of Settlement, is fair, reasonable, and adequate, thus warranting final approval; and (iii) whether  
13 Class Counsel’s requested attorneys’ fees and expenses and Plaintiffs’ requested service awards  
14 are reasonable and should be approved; and

15 WHEREAS, it appearing that notice of the Settlement and the Fairness Hearing has been  
16 given in accordance with the Preliminary Approval Order; the parties having appeared by their  
17 respective attorneys of record; the Court having heard and considered evidence in support of Class  
18 Counsel’s request for attorneys’ fees and expenses and Plaintiffs’ request for service awards; the  
19 attorneys for the respective parties having been heard; an opportunity to be heard having been  
20 given to all other persons or entities requesting to be heard in accordance with the Preliminary  
21 Approval Order; the Court having determined that the Notice to the Class was adequate and  
22 sufficient; the Court having found that the requests for attorneys’ fees and expenses and service  
23 awards are fair, reasonable, and adequate and otherwise being fully informed in the premises and  
24 good cause appearing therefore:

25 NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, as  
26 follows:

27 1. Unless otherwise defined in this Order, the capitalized terms used herein have the same  
28 meanings as in the Stipulation of Settlement (“Stipulation”) dated January 17, 2025 (ECF 244-1).

2. The Court has jurisdiction over the subject matter of this application and all matters relating thereto, including all Class Members who have not timely and validly requested exclusion.

3. The Court hereby awards Class Counsel attorneys' fees of \_\_\_\_\_ of the Settlement Amount or \$\_\_\_\_\_, plus litigation expenses in the amount of \$\_\_\_\_\_, together with the interest earned thereon for the same time period and at the same rate as that earned on the Settlement Fund until paid. The Court finds that the amount of fees awarded is fair and reasonable under the "percentage-of-recovery" method given the substantial risks of non-recovery, the time and effort involved, and the result obtained for the Class. The Court additionally finds that the costs and expenses were reasonably incurred in the ordinary course of prosecuting this Action and were necessary given the complex nature of the Action.

4. The Court approves service awards to Plaintiffs Bruce Svitak, Barbara Svitak, and Cecilia Pemberton in the amount of \$\_\_\_\_\_ for each Plaintiff. This award is reasonable and justified given: (i) the time and effort expended, the work performed, and the active participation in the litigation and settlement processes by each Plaintiff; (ii) the benefit to the Class due to each Plaintiff's actions on their behalf; and (iii) the length of the case.

5. The awarded attorneys' fees and expenses and interest earned thereon shall immediately be paid to Class Counsel subject to the terms, conditions, and obligations of the Stipulation, which terms, conditions, and obligations are incorporated.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
MAXINE M. CHESNEY  
UNITED STATES DISTRICT JUDGE