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11 *Class Counsel*

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SANTA CLARA

14 MATT WOLTHER, Individually and on
15 Behalf of All Others Similarly Situated,
16 Plaintiff,

17 vs.

18 SHUBHAM MAHESHWARI, et al.,
19 Defendants.

) Lead Case No. 18CV329690
) (Consolidated with No. 18CV332463 and
) No. 18CV332644)

) CLASS ACTION

) SUPPLEMENTAL DECLARATION #2 OF
) ROSS D. MURRAY REGARDING NOTICE
) DISSEMINATION, REQUESTS FOR
) EXCLUSION RECEIVED TO DATE,
) INTERIM CLAIMS PROCESSING, AND
) ADMINISTRATION FEES AND EXPENSES

22 DATE: June 23, 2022
23 TIME: 1:30 p.m.
24 JUDGE: Hon. Sunil R. Kulkarni
DEPT.: 1
25 Date Action Filed: June 8, 2018

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

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

7 2. Pursuant to this Court’s December 7, 2021 Order Preliminarily
8 Approving Settlement and Providing for Notice (“Notice Order”), Gilardi was
9 appointed to supervise and administer the notice procedure as well as the processing
10 of claims in connection with the proposed Settlement of the above-captioned action
11 (the “Action”). I oversaw the notice services that Gilardi provided in accordance
12 with the Notice Order.

13 3. I submit this declaration as a supplement to my two previous
14 declarations: (1) the Declaration of Ross D. Murray Regarding Notice
15 Dissemination, Publication, and Requests for Exclusion Received to Date (the
16 “Initial Mailing Declaration”), dated February 3, 2022; and (2) the Supplemental
17 Declaration of Ross D. Murray Regarding Notice Dissemination, Requests for
18 Exclusion Received to Date, Interim Claims Processing, and Administration Fees
19 and Expenses, dated April 13, 2022.

20 **UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE**

21 4. As more fully detailed in the Initial Mailing Declaration, as of February
22 3, 2022, Gilardi had mailed 20,494 copies of the Court-approved Notice of Proposed
23 Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the
24 “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members
25 and their nominees. *See* Initial Mailing Declaration, ¶11.

26 5. Subsequent to February 3, 2022, Gilardi mailed an additional 3,998
27 copies of the Claim Package in response to requests from potential Class Members,
28

1 brokers, and nominees and as a result of mail returned as undeliverable for which
2 new addresses were identified and re-mailed to those new addresses. Therefore, as
3 of June 16, 2022, Gilardi has mailed a total of 24,492 Claim Packages to potential
4 Class Members and nominees.

5 **REQUESTS FOR EXCLUSION RECEIVED TO DATE**

6 6. Pursuant to the Notice Order, the Notice informed potential Class
7 Members that written requests for exclusion from the Class must be mailed to *Veeco*
8 *Securities Settlement*, c/o Gilardi & Co. LLC, EXCLUSIONS, 150 Royall Street,
9 Suite 101, Canton, MA 02021, such that they are postmarked no later than February
10 21, 2022. At the time of the Initial Mailing Declaration, Gilardi had not received
11 any requests for exclusion from the Class at this mailing address. *See* Initial Mailing
12 Declaration, ¶16.

13 7. Since the Initial Mailing Declaration was executed, and as of the date
14 of this declaration, Gilardi has received two timely requests for exclusion, redacted
15 copies of which were attached as Exhibit A to my Supplemental Declaration dated
16 April 13, 2022.

17 **INTERIM CLAIMS PROCESSING**

18 8. The Notice informed potential Class Members that in order to be
19 eligible to receive a payment from the settlement they must complete and submit
20 their Proof of Claim to Gilardi so that it is postmarked or submitted online no later
21 than March 22, 2022.

22 9. As of June 10, 2022, Gilardi has received and partially processed a total
23 of 3,204 Proofs of Claim. Claims processing is ongoing and these claims are being
24 reviewed by analysts to approve valid claims, to resolve errors in data entered on the
25 claims and to identify claims with other types of deficiencies or issues such as
26 duplicate submissions and claims which lack the supporting documentation
27 required.

28

1 10. Of the 3,204 claims received, to date Gilardi has identified that a
2 significant number of the claims have data issues, deficiencies, or other potential
3 concerns requiring further review. There are 1,108 claims with potential deficiency
4 or data issues which are being reviewed to determine if we can resolve the issue with
5 documentation included with the submission or analysis of the claim information.
6 In addition, 47 claims have a deficiency which has been reviewed and identified to
7 be uncurable with the documentation and information provided to date. A total of
8 45 claims have been identified as duplicate claims. And 1,281 claims preliminarily
9 may be determined to be ineligible and rejected based upon the transaction data as
10 submitted, which includes claims with no shares received in the merger and claims
11 which calculate no loss according to the Plan of Allocation; however, these claims
12 have not yet been fully reviewed to determine if the claim can be validated with
13 additional information included in any documentation provided.

14 11. While further submissions by Class Members and reviews conducted
15 by Gilardi may affect whether a submitted claim is finally determined to be valid or
16 ineligible, to date Gilardi has identified 723 claims which would appear to be valid
17 at this point based on the information received by Gilardi.

18 12. If any deficiency in a claim exists and it is not able to be resolved by an
19 analyst, Class Members will be notified of that deficiency and provided with an
20 opportunity to respond with further information or documentation to resolve the
21 issue. As these reviews and amendments to claims often impact the status and
22 recognized loss of the claim, the total number of valid claims, recognized loss of
23 those claims, and amount of average per share payment is not available until claims
24 processing is complete. Given the complexity of the claims review process, if there
25 are no requests for Court review of deficient or rejected claims, we estimate that the
26 initial distribution of the Net Settlement Fund will take place in approximately 7
27 months.

28

EXHIBIT A



1 McInnis Pkwy, Suite 250
San Rafael, CA 94903

25 February 2022

David C. Walton, Esq.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego CA 92101

Re: **Veeco Securities Settlement**
Client Matter Number: VEE
Invoice: 2181679

Professional services, publication expenses, and third party expenses from November 1, 2021 through January 31, 2022 in connection with the printing and mailing of the notice and claim form for Veeco Securities Settlement

Summary:	Professional and Clerical Staff	\$47,307.50
	Publication Expenses	\$20,271.92
	Third Party Expenses	\$26,725.93
Invoice Subtotal		\$94,305.35
Total Sales and Use Tax		\$1,144.29
Total Amount Due		\$95,449.64

STAFF	HOURS	RATE	TOTAL
Principal	35.5	\$290.00	\$10,295.00
Director	2	\$235.00	\$470.00
Senior Manager	64	\$185.00	\$11,840.00
Manager	130.75	\$160.00	\$20,920.00
Staff	44.5	\$85.00	\$3,782.50
			\$47,307.50

PUBLICATION EXPENSES	TOTAL
Published Notice	\$20,271.92
\$20,271.92	

THIRD PARTY EXPENSES	TOTAL
Printing and Mailing	\$21,741.67
Postage and Delivery	\$4,356.57
Broker	\$627.69
\$26,725.93	

Please detach and return this portion of the statement with your check to Computershare.

Please reference your Account Number and Invoice Number on your Remittance.

Account Number [REDACTED]
Invoice Number US_ASG2181679
Total Amount Due \$95,449.64
Amount Paid \$

Remit Check Payments to:
 Gilardi & Co LLC
 Dept CH 16639
 Palatine, IL 60055-6639

Wire Payments to:
 Gilardi & Co LLC
 HSBC Bank, NA
 452 Fifth Avenue
 New York, NY 10081
 Account # [REDACTED]
 FED ABA # [REDACTED]
 ACH Routing # [REDACTED]



1 McInnis Pkwy, Suite 250
San Rafael, CA 94903

08 April 2022

David C. Walton, Esq.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego CA 92101

Re: **Veeco Securities Settlement**
Client Matter Number: VEE
Invoice: 2234469

Professional services and third party expenses from February 1, 2022 through February 28, 2022 in connection with the claims administration for the Veeco Securities Settlement

Summary:	Professional and Clerical Staff	\$10,040.00
	Third Party Expenses	\$11,271.65
Invoice Subtotal		\$21,311.65
Total Sales and Use Tax		\$7.00
Total Amount Due		\$21,318.65

STAFF	HOURS	RATE	TOTAL
Principal	6	\$290.00	\$1,740.00
Director	1.25	\$235.00	\$293.75
Senior Manager	6.5	\$185.00	\$1,202.50
Manager	27.25	\$160.00	\$4,360.00
Staff	28.75	\$85.00	\$2,443.75
			\$10,040.00

THIRD PARTY EXPENSES	TOTAL
Printing and Mailing	\$194.54
Broker	\$11,077.11
\$11,271.65	

Please detach and return this portion of the statement with your check to Computershare.

Please reference your Account Number and Invoice Number on your Remittance.

Account Number [REDACTED] **Remit Check Payments to:**
Invoice Number US_ASG2234469 Gilardi & Co LLC
Total Amount Due \$21,318.65 Dept CH 16639
 Palatine, IL 60055-6639
Amount Paid \$ [REDACTED]

Wire Payments to:
 Gilardi & Co LLC
 HSBC Bank, NA
 452 Fifth Avenue
 New York, NY 10081
 Account # [REDACTED]
 FED ABA # [REDACTED]
 ACH Routing # [REDACTED]



1 McInnis Pkwy, Suite 250
San Rafael, CA 94903

20 May 2022

David C. Walton, Esq.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego CA 92101

Re: **Veeco Securities Settlement**
Client Matter Number: VEE
Invoice: 2252212

Professional services and third party expenses from March 1, 2022 through March 31, 2022 in connection with the claims administration for the Veeco Securities Settlement

Summary:	Professional and Clerical Staff	\$28,313.75
	Third Party Expenses	\$1,961.04
Invoice Subtotal		\$30,274.79
Total Sales and Use Tax		\$44.05
Total Amount Due		\$30,318.84

STAFF	HOURS	RATE	TOTAL
Principal	8	\$290.00	\$2,320.00
Director	2	\$235.00	\$470.00
Senior Manager	19.75	\$185.00	\$3,653.75
Manager	65.5	\$160.00	\$10,480.00
Staff	134	\$85.00	\$11,390.00
			\$28,313.75

THIRD PARTY EXPENSES	TOTAL
Printing and Mailing	\$725.17
Postage and Delivery	\$418.87
Broker	\$817.00
\$1,961.04	

 Please detach and return this portion of the statement with your check to Computershare.

Please reference your Account Number and Invoice Number on your Remittance.

Account Number	██████████	Remit Check Payments to:
Invoice Number	US_ASG2252212	Gilardi & Co LLC
Total Amount Due	\$30,318.84	Dept CH 16639
Amount Paid	\$ <input style="width: 150px; height: 20px;" type="text"/>	Palatine, IL 60055-6639

Wire Payments to:
 Gilardi & Co LLC
 HSBC Bank, NA
 452 Fifth Avenue
 New York, NY 10081
 Account # ██████████
 FED ABA # ██████████
 ACH Routing # ██████████



1 McInnis Pkwy, Suite 250
San Rafael, CA 94903

08 June 2022

David C. Walton, Esq.
Robbins Geller Rudman & Dowd LLP
655 West Broadway, Suite 1900
San Diego CA 92101

Re: **Veeco Securities Settlement**
Client Matter Number: VEE
Invoice: 2270798

Professional services and third party expenses from April 1, 2022 through April 30, 2022 in connection with the claims administration for the Veeco Securities Settlement

Summary:	Professional and Clerical Staff	\$23,788.75
	Third Party Expenses	\$2,047.48
Invoice Subtotal		\$25,836.23
Total Sales and Use Tax		\$65.02
Total Amount Due		\$25,901.25

STAFF	HOURS	RATE	TOTAL
Principal	14.5	\$290.00	\$4,205.00
Director	1.25	\$235.00	\$293.75
Senior Manager	30.25	\$185.00	\$5,596.25
Manager	48	\$160.00	\$7,680.00
Staff	70.75	\$85.00	\$6,013.75
			\$23,788.75

THIRD PARTY EXPENSES	TOTAL
Printing and Mailing	\$659.09
Postage and Delivery	\$1,388.39
\$2,047.48	

Please detach and return this portion of the statement with your check to Computershare.

Please reference your Account Number and Invoice Number on your Remittance.

Account Number [REDACTED] **Remit Check Payments to:**
Invoice Number US_ASG2270798 Gilardi & Co LLC
Total Amount Due \$25,901.25 Dept CH 16639
Palatine, IL 60055-6639

Wire Payments to:
Gilardi & Co LLC
HSBC Bank, NA
452 Fifth Avenue
New York, NY 10081
Account # [REDACTED]
FED ABA # [REDACTED]
ACH Routing # [REDACTED]

Amount Paid \$