

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

BIAO WANG, Individually and on Behalf of)
All Others Similarly Situated,)

Plaintiff,)

vs.)

ZYMERGEN INC., et al.,)

Defendants.)

Case No. 5:21-cv-06028-PCP

DECLARATION OF BIAO WANG IN
SUPPORT OF: (A) LEAD PLAINTIFF'S
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND
APPROVAL OF PLAN OF ALLOCATION;
AND (B) LEAD COUNSEL'S MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND
EXPENSES AND AWARD TO CLASS
REPRESENTATIVE PURSUANT TO 15
U.S.C. §77z-1(a)(4)

DATE: October 13, 2026
TIME: 10:00 a.m.
JUDGE: Honorable P. Casey Pitts
CTRM: 8, 4th Floor

1 I, Biao “Bill” Wang, declare as follows:

2 1. I am a former investor in Zymergen Inc., and served in this litigation as the Court-
3 appointed Lead Plaintiff and Class Representative. I have personal knowledge of the facts stated
4 herein and, if called upon as a witness, I could and would competently testify thereto.

5 2. I respectfully submit this declaration in support of: (a) final approval of the
6 \$125,000,000 settlement (the “Settlement”) of the action reached between me, on behalf of the
7 Class, and the Defendants¹ in the action; (b) approval of Lead Counsel’s application for an award
8 of attorneys’ fees and expenses; and (c) reimbursement of my time spent prosecuting this action.

9 3. In April 2021, I made multiple purchases of Zymergen common stock shortly after
10 the Company’s initial public offering. Following Zymergen’s August 3, 2021, disclosures of
11 significant product and performance issues and the termination of its CEO, the stock price of
12 Zymergen collapsed by 75 percent, and I began the process of exploring legal avenues to recover
13 my investment losses.

14 4. I reached out to various law firms to determine the most suitable candidate to pursue
15 a recovery and ultimately lead this Litigation. I dedicated approximately 15 hours to the selection
16 of the most qualified legal team with the strongest chance of recovering investor losses in
17 Zymergen. After conducting my research, I decided to retain Robbins Geller Rudman & Dowd
18 LLP (“Robbins Geller” or “Lead Counsel”), based on its expertise, reputation, and strong track
19 record.

20 5. Since being appointed Lead Plaintiff on December 20, 2021, and appointed Class
21 Representative on August 11, 2023, I have actively monitored the progress of this Litigation, and
22 I have regularly conferred with Lead Counsel concerning the Litigation and overseen the efforts
23 of Robbins Geller in prosecuting the case. Specifically, in my capacity as Lead Plaintiff and Class
24 Representative, I have: (a) reviewed the pleadings and briefs submitted in this matter, including
25 pleadings related to the appointment of Lead Plaintiff, complaints (including the operative Second
26 Amended Class Action Complaint for Violations of the Federal Securities Laws), multiple motions

27
28 ¹ I understand that Zymergen Inc. is no longer a defendant in this action on account of its
bankruptcy and thus is not a part of this Settlement.

1 to dismiss (and reconsideration thereof), the motion for class certification, and Orders of the Court;
2 (b) prepared for and participated in two depositions, one via videoconference and one in-person in
3 Los Angeles, California; (c) searched for and produced documents, including those related to my
4 investment in Zymergen; (d) reviewed documents obtained in discovery; (e) reviewed and verified
5 numerous written responses to interrogatories concerning my investment in Zymergen, my
6 suitability to be a class representative, and the evidence supporting this action; and (f) regularly
7 discussed with Lead Counsel the status of the case, ongoing developments, and matters of strategy.
8 I also actively participated in settlement discussions, as well as staying apprised of ongoing
9 negotiations with the mediators.

10 6. I have evaluated the risks of continuing this action, including the possibility of a
11 nominal recovery or no recovery at all, and authorized Lead Counsel to settle this Litigation for
12 \$125,000,000. I believe this Settlement is more than fair and reasonable, represents an excellent
13 recovery, and is in the best interest of the members of the Class.

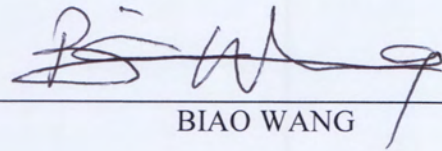
14 7. While I recognize that any determination of fees is left to the Court, I believe that
15 Lead Counsel's application for 25% of the Settlement Fund in legal fees and expenses not to
16 exceed \$3,000,000 is fair and reasonable, as this Settlement would not have been possible without
17 the diligent and aggressive prosecutorial efforts of Lead Counsel.

18 8. I also understand that payment of Lead Plaintiff's and Class Representative's
19 reasonable expenses is authorized under the PSLRA, 15 U.S.C. §77z-1(a)(4). Accordingly, I am
20 seeking reimbursement for my time involved in oversight and direction of the Litigation, as set
21 forth in ¶¶4-5, above, which totaled 231 hours. I am a businessman fluent in English and
22 Mandarin, and currently the owner and principal of Power Ray LLC, a company I founded in 2020.
23 Power Ray LLC is engaged in the manufacture, importation, and sale of products related to water
24 filtration and relies on the experience I developed in China while working for major technology
25 companies. I graduated from Beijing Second Foreign Language Institute in 1991 and earned my
26 MBA from the University of Arizona in 1996. Prior to starting my own business, I was employed
27 by Huawei Technologies from 2011 to 2015, and in my final role with that company I served as
28 Director and CFO of Digital Services and Cloud Computing. I am requesting an award of \$19,635,
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1 which compensates me at a rate of \$85.00 per hour for time I otherwise could have been engaged
2 in the operation of my business.

3 9. I respectfully request that the Court grant final approval of the Settlement and
4 approve Lead Counsel's application for an award of attorneys' fees and expenses. I also
5 respectfully request that the Court approve a payment of \$19,635 to me for the time expended in
6 the case in representing Class Members in the Litigation.

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and correct. Executed this 18 day of August, 2026 in Cary, North Carolina.

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12 BIAO WANG
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