EXHIBIT C

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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 ROSS D. MURRAY REGARDING: (A) NOTICE DISSEMINATION; (B) PUBLICATION; (C) ESTABLISHMENT OF CALL CENTER SERVICES AND WEBSITE; AND (D) REQUESTS FOR EXCLUSION RECEIVED TO DATE DATE: October 13, 2026 TIME: 10:00 a.m. CTRM: 8, 4th Floor JUDGE: Honorable P. Casey Pitts

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

1. I am employed as a Vice President by Verita Global ("Verita"), located at 1 McInnis Parkway, Suite 250, San Rafael, California. The following statements are based on my personal knowledge and information provided to me by others, and if called to testify, I could and would do so competently.

2. Pursuant to the Court's June 22, 2026 Order Granting Motion for Preliminary Approval of Class-Action Settlement (ECF 659) (the "Notice Order"), Verita was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the "Litigation"). I oversaw the notice services provided by Verita in accordance with the Notice Order.

3. I submit this declaration in order to provide the Court and the parties to the Litigation with information regarding: (i) mailing and emailing of the Court-approved Summary Notice of Proposed Settlement of Class Action (the "Summary Notice") (attached hereto as Exhibit A) and, if requested by potential Class Members, mailing of the Notice of Proposed Settlement of Class Action (the "Notice") and Proof of Claim and Release form (the "Proof of Claim") (collectively, the "Claim Package," attached hereto as Exhibit B); (ii) publication of the Summary Notice; (iii) establishment of the website and toll-free telephone number dedicated to this Settlement; and (iv) the number of requests for exclusion from the Class received to date by Verita.

DISSEMINATION OF NOTICE

4. Pursuant to the Notice Order, Verita is responsible for disseminating notice of the Settlement to potential Class Members. The Class consists of all persons and entities who purchased or otherwise acquired Zymergen common stock pursuant and/or traceable to the registration statement and prospectus issued in connection with Zymergen's April 2021 initial public offering. Excluded from the Class are Defendants, the officers and directors of Defendants, at all relevant times, members of their immediate families and their legal representatives, heirs, successors, or assigns and any entity in which Settling Defendants have or had a controlling interest.

5. Verita used the list of stockholders previously compiled in connection with the dissemination of the Notice of Pendency of Class Action ("Notice of Pendency") as the basis for the mailing list for the Summary Notice, as the Class definition has not changed since the mailing list was compiled for the Notice of Pendency. The list was reviewed to identify and eliminate duplicate entries and incomplete data, resulting in a usable mailing list of 1,898 unique names and addresses. On July 13, 2026, Verita caused the Summary Notice to be sent by First-Class Mail to 1,898 potential Class Members.

6. On July 13, 2026, as part of its normal mailing procedures, Verita mailed, by First-Class Mail, Summary Notices and cover letters to 256 brokerages, custodial banks, and other institutions ("Nominee Holders") that hold securities in "street name" as nominees for the benefit of their customers who are the beneficial owners of the securities. The Nominee Holders also include a group of filers/institutions who have requested notification of every securities case. These Nominee Holders are included in a proprietary database created and maintained by Verita. In our experience, the Nominee Holders included in this proprietary database represent a significant majority of the beneficial holders of securities. The cover letter accompanying the Summary Notices advised the Nominee Holders of the proposed Settlement and requested their cooperation in forwarding the Summary Notices to potential Class Members. In the more than four decades that we have been providing notice and claims administration services in securities class actions, we have found the majority of potential class members hold their securities in street name and are notified through the Nominee Holders. Verita also mailed Summary Notices and cover letters to 4,405 institutions included on the U.S. Securities and Exchange Commission's ("SEC") list of active brokers and dealers at the time of mailing. A sample of the cover letter mailed to Nominee Holders and the institutions included on the SEC's list of active brokers and dealers is attached hereto as Exhibit C.

7. On July 13, 2026, Verita also delivered electronic copies of the Summary Notice to 334 registered electronic filers who are qualified to submit electronic claims. These filers are

primarily institutions and third-party filers who typically file numerous claims on behalf of beneficial owners for whom they act as trustees or fiduciaries.

8. As part of the notice program for this Settlement, on July 13, 2026, Verita also caused electronic copies of the Claim Package and Summary Notice to be published by the Depository Trust Company ("DTC") on the DTC Legal Notice System ("LENS"). LENS enables the participating bank and broker nominees to review the Claim Package and Summary Notice and contact Verita for copies of the Summary Notice for their beneficial holders.

9. Verita has acted as a repository for shareholder and nominee inquiries and communications received in this Settlement. In this regard, Verita has forwarded the Summary Notice on request to nominees who purchased or otherwise acquired Zymergen common stock pursuant and/or traceable to the Registration Statement for the beneficial interest of other persons. Verita has also forwarded the Summary Notice directly to beneficial owners upon receipt of the names and addresses from such beneficial owners or nominees.

10. Following the initial mailing, Verita received two responses to the outreach efforts described above, which included computer files containing a total of five names and addresses and 215 email addresses of potential Class Members. In addition, 26 institutions requested that Verita send them a total of 4,449 Summary Notices for forwarding directly to their clients. Verita has not received any requests for Claim Packages from potential Class Members. Each of these requests has been completed in a timely manner.

11. As of August 17, 2026, Verita has mailed or emailed a total of 11,562 Summary Notices. In addition, one institution reported that they anticipated sending Summary Notices via email to 7,996 potential Class Members.

PUBLICATION OF THE SUMMARY NOTICE

12. In accordance with the Notice Order, on July 20, 2026, Verita caused the Summary Notice to be published in the national edition of *The Wall Street Journal* and transmitted over *Business Wire*, as shown in the confirmations of publication attached hereto as Exhibit D.

ESTABLISHMENT OF CALL CENTER SERVICES AND SETTLEMENT WEBSITE

13. On September 27, 2023, in conjunction with the mailing of the Notice of Pendency, Verita established and continues to maintain a case-specific, toll-free telephone number, 1-888-858-5903, to accommodate potential Class Member inquiries. The toll-free telephone number is set forth in the Notice, Summary Notice, and on the case website. Verita has been and will continue to promptly respond to all inquiries to the toll-free telephone helpline.

14. On September 27, 2023, in conjunction with the mailing of the Notice of Pendency, Verita established and continues to maintain a website dedicated to this Settlement (www.ZymergenSecuritiesLitigation.com) to provide additional information to Class Members and to provide answers to frequently asked questions. The web address is set forth in the Notice, Proof of Claim, and Summary Notice. The website includes information regarding the Litigation and the Settlement, including the objection and claim filing deadlines, and details about the Court's Settlement Hearing. Copies of the Notice, Proof of Claim, Stipulation, and Notice Order are posted on the website and are available for downloading. In addition, the website allows Class Members to submit their Proofs of Claim online.

REQUESTS FOR EXCLUSION RECEIVED TO DATE

15. The Notice of Pendency informed potential Class Members that written requests for exclusion from the Class were to be sent to Verita, such that they were postmarked no later than December 5, 2023.

16. The Notice of Pendency also set forth the information that must be included in each request for exclusion. As noted in my previously submitted declaration (ECF 229), Verita did not receive any requests for exclusion in response to the Notice of Pendency. As an update, as of the date of this declaration, Verita has not received any requests for exclusion from the Class.

17. Although the Notice Order (and the Notice) provides that Class Members who wish to file objections must file them with the Court, I also note for the sake of completeness that, as of the date of this declaration, Verita has not received any objections.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 17th day of August, 2026, at San Rafael, California.

ROSS D. MURRAY

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

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED ZYMERGEN INC. ("ZYMERGEN") COMMON STOCK PURSUANT AND/OR TRACEABLE TO THE REGISTRATION STATEMENT AND PROSPECTUS ISSUED IN CONNECTION WITH ITS APRIL 2021 INITIAL PUBLIC OFFERING ("CLASS" OR "CLASS MEMBERS")

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

YOU ARE HEREBY NOTIFIED that a hearing will be held on October 13, 2026, at 10:00 a.m., before the Honorable P. Casey Pitts at the United States District Court, Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1st Street, San Jose, CA 95113, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned action ("Action") as set forth in the Stipulation of Settlement ("Stipulation") for $125,000,000 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the Action with prejudice; (3) to award Lead Counsel attorneys' fees and expenses and awards to Plaintiffs pursuant to 15 U.S.C. §77z-1(a)(4) out of the Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action ("Notice"), which is discussed below), and, if so, in what amounts; and (4) the Plan of Allocation should be approved by the Court as fair, reasonable, and adequate.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE SETTLEMENT OF THIS ACTION, AND YOU MAY BE ENTITLED TO SHARE IN THE NET SETTLEMENT FUND.

To share in the distribution of the Net Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form ("Proof of Claim") by mail **(postmarked no later than October 11, 2026)** or electronically via the website **(no later than October 11, 2026)**. Failure to submit your Proof of Claim by October 11, 2026, will subject your claim to rejection and preclude you from receiving any of the recovery in connection with the Settlement of this Action. If you purchased or acquired Zymergen common stock pursuant and/or traceable to the Registration Statement issued in connection with Zymergen's April 2021 initial public offering, you will be bound by the Settlement and any judgment and releases entered in the Action, including, but not limited to, the Judgment, whether or not you submit a Proof of Claim.

You may review the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), access the Proof of Claim, and find the Stipulation (which, among other things, contains definitions for the defined terms used in this Summary Notice) and other Settlement documents, online at www.ZymergenSecuritiesLitigation.com, or by contacting the Claims Administrator:

Zymergen Securities Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301135
Los Angeles, CA 90030-1135
Telephone: 1-888-858-5903
info@ZymergenSecuritiesLitigation.com

Inquiries should NOT be directed to Settling Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim, may be made to Lead Counsel:

ROBBINS GELLER RUDMAN & DOWD LLP
Ellen Gusikoff Stewart
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 1-800-449-4900
settlementinfo@rgrdlaw.com

Zymergen Securities Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301135
Los Angeles, CA 90030-1135

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No further exclusion opportunity is being provided under the Settlement. Because no Class Member validly excluded themselves previously when notice was provided, you will be bound by any judgment entered by the Court in this Litigation (including the releases provided for therein) whether or not you submit a Proof of Claim.

IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, AND/OR THE REQUEST BY LEAD COUNSEL FOR AN AWARD OF ATTORNEYS' FEES NOT TO EXCEED 30% OF THE SETTLEMENT AMOUNT AND EXPENSES NOT TO EXCEED $3,000,000, PLUS INTEREST ON BOTH AMOUNTS, AND/OR THE AWARDS TO PLAINTIFFS PURSUANT TO 15 U.S.C. §77z-1(a)(4) IN CONNECTION WITH THEIR REPRESENTATION OF THE CLASS. ANY OBJECTIONS MUST BE FILED WITH THE COURT **BY SEPTEMBER 22, 2026**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

DATED: June 22, 2026

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EXHIBIT B

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

NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED ZYMERGEN INC. ("ZYMERGEN" OR THE "COMPANY") COMMON STOCK PURSUANT AND/OR TRACEABLE TO THE REGISTRATION STATEMENT AND PROSPECTUS ISSUED IN CONNECTION WITH ITS APRIL 2021 INITIAL PUBLIC OFFERING (THE "CLASS" OR "CLASS MEMBERS")

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY PROCEEDINGS IN THE ABOVE-CAPTIONED ACTION ("ACTION" OR "LITIGATION"). PLEASE NOTE THAT IF YOU ARE A CLASS MEMBER, YOU MAY BE ENTITLED TO SHARE IN THE PROCEEDS OF THE SETTLEMENT DESCRIBED IN THIS NOTICE. TO CLAIM YOUR SHARE OF THE SETTLEMENT PROCEEDS, YOU MUST SUBMIT A VALID PROOF OF CLAIM AND RELEASE FORM ("PROOF OF CLAIM" OR "CLAIM FORM") **POSTMARKED OR SUBMITTED ONLINE ON OR BEFORE OCTOBER 11, 2026**.

This Notice of Proposed Settlement of Class Action ("Notice") has been provided to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of California (the "Court"). The purpose of this Notice is to inform you of the proposed $125,000,000 settlement of the Litigation (the "Settlement") and of the hearing to be held by the Court (the "Settlement Hearing") to consider the fairness, reasonableness, and adequacy of the Settlement set forth in the Stipulation of Settlement dated March 23, 2026 (the "Stipulation"), by and between Lead Plaintiff Biao Wang, on behalf of himself and the Class (as defined below), on the one hand, and Defendants Josh Hoffman, Enakshi Singh, Steven Chu, Jay Flatley, Christine Gorjanc, Travis Murdoch, Matthew Ocko, Sandra Peterson, Zach Serber, and Rohit Sharma (the "Individual Defendants"), J.P. Morgan Securities LLC, Goldman Sachs & Co. LLC, Cowen and Company, LLC,[1] BofA Securities, Inc., UBS Securities LLC, and Lazard Frères & Co. LLC (the "Underwriter Defendants"), True Ventures IV, L.P., True Ventures Select I, L.P., True Ventures Select II, L.P., True Ventures Select III, L.P., True Ventures Select IV, L.P., True Venture Management, L.L.C., SVF Excalibur (Cayman) Limited, SVF Endurance (Cayman) Limited, Soft Bank Vision Fund (AIV M1) L.P., SB Investment Advisors (US) Inc., Data Collective II, L.P., DCVC Opportunity Fund, L.P., and DCVC Management Co, LLC (the "VC Defendants" and together with the Individual Defendants and the Underwriter Defendants, the "Settling Defendants"), on the other hand, as well as counsel's application for fees and expenses.[2] This Notice describes what steps you may take in relation to the Settlement and this class action.[3]

This Notice is not intended to be, and should not be construed as, an expression of any opinion by the Court with respect to the truth of the allegations in the Action as to any of the Settling Defendants or the merits of the claims or defenses asserted by or against the Settling Defendants. This Notice is solely to advise you of the proposed Settlement of the Action and of your rights in connection therewith.

[1] In December 2024, Cowen and Company, LLC ("Cowen") formally merged into TD Securities (USA) LLC, a wholly-owned subsidiary of Toronto Dominion Holdings (U.S.A.), Inc. The surviving entity in the merger was TD Securities (USA) LLC, and Cowen no longer exists as a separate entity. Pursuant to ¶9.13 of the Stipulation, the Stipulation is binding upon, and inures to the benefit of, TD Securities (USA) LLC as Cowen's successor-in-interest.

[2] On October 5, 2023, Zymergen filed for Chapter 11 bankruptcy protection, triggering a stay of litigation against it. In light of the February 24, 2024 order in the Bankruptcy Court for the District of Delaware confirming the Plan of Liquidation, which permitted this action to proceed against Zymergen only to the extent of any available insurance, and that insurance having been fully exhausted, Zymergen asserts that it is not subject to liability in the action and is not a party to this Settlement.

[3] All capitalized terms used in this Notice that are not otherwise defined herein shall have the meanings provided in the Stipulation, which is available on the website www.ZymergenSecuritiesLitigation.com.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A PROOF OF CLAIM	The only way to be eligible to receive a payment from the Settlement. **Proofs of Claim must be postmarked or submitted online on or before October 11, 2026.**
OBJECT	Write to the Court about why you do not like the Settlement, the Plan of Allocation, and/or the request for attorneys' fees and expenses. You will still be a Member of the Class. **Objections must be *filed or postmarked no later than* September 22, 2026. If you submit a written objection, you may (but do not have to) attend the hearing.**
ATTEND THE HEARING ON OCTOBER 13, 2026	Ask to speak in Court about the fairness of the Settlement. **Requests to speak must be *filed or postmarked no later than* September 22, 2026.**
DO NOTHING	Receive no payment. You will, however, still be a Member of the Class, and you will be bound by any judgments or orders entered by the Court in the Action.

SUMMARY OF THIS NOTICE

Statement of Class Recovery

Pursuant to the Settlement described herein, a $125 million settlement fund has been established. Based on Lead Plaintiff's estimate of the number of Zymergen shares eligible to recover under the Settlement, the average distribution per common share under the Plan of Allocation is approximately $6.21 before deduction of any taxes on the income earned on the Settlement Amount thereof, notice and administration costs, and the attorneys' fees and expenses as determined by the Court. **Class Members should note, however, that this is only an estimate.** A Class Member's actual recovery will be a proportion of the Net Settlement Fund determined by that claimant's Recognized Loss Amount as compared to the total Recognized Claim Amount of all Class Members who submit acceptable Proofs of Claim. An individual Class Member may receive more or less than this estimated average amount. *See* the Plan of Allocation set forth and discussed at pages 9 through 11 below for more information on the calculation of your claim.

Statement of Potential Outcome of Case

The Parties disagree on both liability and damages and do not agree on the amount of damages that would be recoverable if the Class prevailed on each claim alleged. Settling Defendants deny that they are liable to the Class and deny that the Class has suffered any damages. The issues on which the Parties disagree are many, but include: (1) whether Settling Defendants engaged in conduct that would give rise to any liability to the Class under the federal securities laws; and (2) whether Settling Defendants have valid defenses to any such claims of liability.

Statement of Attorneys' Fees and Expenses Sought

Since the Action's inception, Lead Counsel has expended considerable time and effort in the prosecution of this Action on a wholly contingent basis and has advanced the expenses of the Action in the expectation that if it was successful in obtaining a recovery for the Class, it would be paid from such recovery. Lead Counsel will apply to the Court for an award of attorneys' fees not to exceed thirty percent (30%) of the Settlement Amount, plus expenses not to exceed $3,000,000, plus interest earned on both amounts. If the amounts requested are approved by the Court, the average cost per Zymergen common share will be approximately $2.01. Plaintiffs may seek payment for their time and expenses incurred in representing the Class.

Further Information

For further information regarding the Action, this Notice, or to review the Stipulation, please contact the Claims Administrator toll-free at 1-888-858-5903, email info@ZymergenSecuritiesLitigation.com, or visit the website www.ZymergenSecuritiesLitigation.com.

You may also contact a representative of counsel for the Class: Ellen Gusikoff Stewart, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, 1-800-449-4900, settlementinfo@rgrdlaw.com.

Please Do Not Call the Court or Settling Defendants with Questions About the Settlement.

Reasons for the Settlement

Lead Plaintiff's principal reason for entering into the Settlement is the benefit to the Class now, without further risk or the delays inherent in continued litigation. The cash benefit under the Settlement must be considered against the significant risk that a smaller recovery – or, indeed, no recovery at all – might be achieved after contested motions, trial, and likely appeals, a process that could last several years into the future. For the Settling Defendants, who have denied and continue to deny all allegations of liability, fault, or wrongdoing whatsoever, and deny that the Class was harmed or suffered any damages as a result of the conduct alleged in the Action, the principal reason for entering into the Settlement is to eliminate the uncertainty, risk, costs, and burdens inherent in any action, especially in complex cases such as this Action.

BASIC INFORMATION

1. What is the purpose of this Notice?

This Notice is being provided to you pursuant to an Order of a U.S. District Court because you or someone in your family or an investment account for which you serve as custodian may have purchased or acquired Zymergen common stock pursuant and/or traceable to the Registration Statement issued in connection with Zymergen's April 2021 initial public offering.

This Notice explains the class action lawsuit, the Settlement, Class Members' legal rights in connection with the Settlement, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the Action is the United States District Court for the Northern District of California (the "Court"), and the case is known as *Wang v. Zymergen Inc., et al.*, No. 5:21-cv-06028-PCP. The case has been assigned to the Honorable P. Casey Pitts. The case was initially pending before the Hon. Vince Chhabria, and was transferred to Judge Pitts on August 18, 2023. The person representing the Class is the Lead Plaintiff, and the companies and individuals he sued and who have now settled are called the Settling Defendants.

2. What is this lawsuit about?

The initial complaint in the Litigation was filed on August 4, 2021. On December 20, 2021, the Court appointed Biao Wang as Lead Plaintiff and Robbins Geller Rudman & Dowd LLP as Lead Counsel.

On February 24, 2022, Lead Plaintiff and named plaintiff West Palm Beach Firefighters' Pension Fund filed the first amended complaint ("FAC") alleging (1) violations under §11 of the Securities Act of 1933 ("Securities Act") for a false and misleading prospectus and Form S-1 (the "Registration Statement") against Zymergen, the Individual Defendants, and the Underwriter Defendants; and (2) control person violations under §15 under the Securities Act against the Individual Defendants and the VC Funds.[4]

Defendants moved to dismiss the FAC on April 25, 2022.[5] On November 29, 2022, the Court denied Defendants' motions with respect to the §11 claims and the §15 claims against the Individual Defendants. The Court granted the VC Funds' motion to dismiss the §15 claims against them.

On April 6, 2023, Lead Plaintiff filed his class certification motion. After obtaining discovery from Plaintiffs, the Defendants then in the Litigation did not oppose class certification, but reserved all rights, including an express reservation of their rights to revise the class definition in connection with any potential settlement or otherwise. On August 11, 2023, Judge Chhabria granted Lead Plaintiff's motion and certified a class of Zymergen investors. On September 6, 2023, the Court approved the dissemination of class notice. Notice of the pendency of the Litigation was provided to over 9,200 potential Class Members and nominees; no potential Class Member elected to opt out of this Action. A website was also established, www.ZymergenSecuritiesLitigation.com, which contains case information for Class Members, as well as copies of important documents.

On December 21, 2023, Lead Plaintiff sought leave to file a second amended class action complaint ("SAC") prior to the Court-established deadline to amend, that made additional allegations in support of the previously-dismissed §15 claims against the VC Funds, and added True Venture Management, L.L.C., DCVC Management Co, LLC, and SB Investment Advisors (US) Inc. as defendants to the same claims, along with a new *respondeat superior* theory. The VC Defendants opposed Lead Plaintiff's request for leave to file the amended complaint; on February 26, 2024, the Court granted Lead Plaintiff's motion for leave and the SAC became the operative complaint.

On April 4, 2024, the VC Defendants each filed motions to dismiss the SAC. Following oral argument, on August 14, 2024, the Court granted in part and denied in part the VC Defendants' motions. The Court found that Lead Plaintiff had adequately alleged §15 claims against each of the VC Defendants for control over Zymergen, and adequately alleged §15 claims and *respondeat superior* claims against the True Ventures and SoftBank Defendants related to their control of their respective designated board members. The Court dismissed the claims that the DCVC Defendants controlled or were responsible for defendant Ocko.

The VC Defendants sought interlocutory review under 28 U.S.C. §1292(b) of the Court's order on their motions to dismiss. Following briefing and argument, on December 16, 2024, the Court denied the motion for interlocutory review. The DCVC Defendants also moved for partial entry of judgment under Fed. R. Civ. P. 54(b), which the Court denied in its December 18, 2024 Order.

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[4] The VC Funds refers to True Ventures IV, L.P., True Ventures Select I, L.P., True Ventures Select II, L.P., True Ventures Select III, L.P., True Ventures Select IV, L.P., SVF Excalibur (Cayman) Limited, SVF Endurance (Cayman) Limited, Soft Bank Vision Fund (AIV M1) L.P., Data Collective II, L.P., and DCVC Opportunity Fund, L.P.

[5] The VC Management Companies are True Venture Management, L.L.C., SB Investment Advisors (US) Inc., and DCVC Management Co, LLC. They did not move to dismiss the FAC as Plaintiffs had not yet pled claims against them.

Fact discovery commenced in this Action in December 2022, was stayed during the pendency of the VC Defendants' motions to dismiss the SAC, and resumed until the January 31, 2025 deadline. Lead Plaintiff sought discovery from each of the Defendants, as well as numerous non-parties, including certain of Zymergen's customers, consultants, PR firms, auditor, and covering securities analysts, as well as the U.S. Securities and Exchange Commission ("SEC"). The Parties exchanged voluminous document productions, propounded and responded to interrogatories, and deposed multiple fact witnesses on each side. Lead Plaintiff deposed six fact witnesses, including Defendants, their current and former employees, and one non-party. Plaintiffs (or their representatives) were each deposed by Zymergen prior to class certification and a second time by the VC Defendants. The Parties engaged in extensive motion practice related to a wide array of discovery disputes, including issues related to relevance, document preservation, and privilege.

Following the close of fact discovery, the Parties exchanged expert reports and engaged in expert discovery, which closed on May 30, 2025. Lead Plaintiff served two opening expert reports and two rebuttal reports from a total of four experts. Defendants served five opening expert reports and two rebuttal reports from a total of five experts. The Parties' expert reports concerned, among other things, due diligence, corporate control, causation, damages, and risk disclosures. Defendants deposed all four of Lead Plaintiff's experts.

On February 28, 2025, the VC Defendants filed a motion asking the Court to set a briefing schedule for Lead Plaintiff to file a second class certification motion. During a March 6, 2025 hearing, the Court denied the motion. On March 20, 2025, the VC Defendants filed a petition seeking Rule 23(f) review by the U.S. Court of Appeals for the Ninth Circuit. On June 18, 2025, the Ninth Circuit's motions panel granted that petition.

On June 25 and 26, 2025, Defendants filed motions asking the Court to stay the case pending the Ninth Circuit's resolution of the VC Defendants' Rule 23(f) petition. On June 26, 2025, Lead Plaintiff filed a motion to modify the case schedule to, among other things, seek reconsideration of an earlier discovery order by the Magistrate Judge pertaining to Zymergen's asserted privileges in light of a state court lawsuit against certain of the Individual Defendants brought by Zymergen's liquidating trustee.

On August 4, 2025, the Court issued an order staying the case as to the VC Defendants only, permitting Lead Plaintiff to seek reconsideration of the Magistrate Judge's privilege order, and vacating all other case deadlines. On October 22, 2025, the Magistrate Judge issued an order denying Lead Plaintiff's motion to seek reconsideration of the Magistrate Judge's privilege order. On November 5, 2025, Lead Plaintiff filed a motion for relief from the Magistrate Judge's October 22, 2025 order. Lead Plaintiff's motion for relief and the VC Defendants' Rule 23(f) appeal continued to be litigated.

On November 25, 2025, the Parties informed the Court that they reached a settlement in principle, and the Court granted the Parties' Stipulation to stay all deadlines until further order of the Court.

The Parties negotiated the terms of the Stipulation and its related exhibits, and executed the Stipulation of Settlement on March 23, 2026. The Court granted Lead Plaintiff's unopposed motion for preliminary approval of the Settlement on June 22, 2026.

Settling Defendants have denied, and continue to deny, all allegations of fault, liability, wrongdoing, or damages against them arising out of any of the statements or omissions alleged, or that could have been alleged, in the Litigation. Settling Defendants expressly have denied, and continue to deny, that they have committed any act or made any materially misleading statement giving rise to any liability under the federal securities laws. Settling Defendants expressly have denied, and continue to deny, that they have committed any wrongdoing or violation of law as alleged in any complaint in the Litigation or that could have been alleged in the Litigation, and Settling Defendants maintain that their conduct was at all times proper and in compliance with all applicable provisions of law. Settling Defendants expressly have denied, and continue to deny, that they made any material misstatement or omission or that any Class Member, including Lead Plaintiff, suffered any damages; or that any Class Member, including Lead Plaintiff, was harmed by any conduct alleged in the Litigation or that could have been alleged in the Litigation. Settling Defendants further contend that they performed reasonable and customary due diligence with respect to the statements in the Registration Statement. In addition, the VC Defendants have argued that they did not control Zymergen or their appointed directors. Settling Defendants maintain that they have meritorious defenses to all claims alleged in the Litigation.

3. Why is there a settlement?

The Court has not decided in favor of Settling Defendants or the Lead Plaintiff. Instead, both sides agreed to the Settlement to avoid the distraction, costs, and risks of further litigation, and Lead Plaintiff agreed to the Settlement in order to ensure that Class Members will receive compensation.

If there were no settlement and Lead Plaintiff failed to establish any essential legal or factual element of his claims against Settling Defendants, neither Lead Plaintiff nor the other members of the Class would recover anything from Settling Defendants. Also, if Settling Defendants proved any of their defenses at trial or on appeal, the Class could recover substantially less than the amount provided in the Settlement, or nothing at all.

WHO IS IN THE SETTLEMENT

4. How do I know if I am a Member of the Class?

The Court directed that everyone who fits this description is a Class Member: all persons and entities who purchased or otherwise acquired Zymergen common stock pursuant and/or traceable to the Registration Statement issued in connection with Zymergen's April 2021 initial public offering.

Excluded from the Class, however, are Defendants, the officers and directors of Defendants, at all relevant times, members of their immediate families and their legal representatives, heirs, successors, or assigns and any entity in which Settling Defendants have or had a controlling interest. For the avoidance of doubt, any "Investment Vehicle" shall not be excluded from the Class. "Investment Vehicle" means any investment company or pooled investment fund, including, but not limited to, mutual fund families, exchange traded funds, fund of funds and hedge funds, and retirement accounts and employee benefit plans, in which Settling Defendants, or any of them, have, has, or may have a direct or indirect interest, or as to which Settling Defendants' affiliates may act as an investment advisor or manager, but in which any Settling Defendant alone or together with its, his, or her respective affiliates is not a majority owner or does not hold a majority beneficial interest.

Please Note: Receipt of this Notice or the Summary Notice does not mean that you are a Class Member or that you will be entitled to receive a payment from the Settlement. If you are a Class Member and you wish to be eligible to participate in the distribution of the proceeds from the Settlement, you are required to submit the Proof of Claim and the required supporting documentation as set forth therein postmarked or submitted online at www.ZymergenSecuritiesLitigation.com on or before October 11, 2026.

5. What if I am still not sure if I am included?

If you are still not sure whether you are included, you can ask for free help. You can contact the Claims Administrator toll-free at 1-888-858-5903 or via email at info@ZymergenSecuritiesLitigation.com, or you can fill out and return the Proof of Claim, to see if you qualify.

THE SETTLEMENT BENEFITS – WHAT YOU GET

6. What does the Settlement provide?

The Settlement provides that, in exchange for the release of the Released Plaintiff's Claims (defined below) and dismissal of the Action, Settling Defendants have agreed to pay or cause to be paid $125 million in cash to be distributed after taxes, tax expenses, notice and claims administration expenses, and approved fees and expenses, *pro rata*, to Class Members who send in a valid Proof of Claim pursuant to the Court-approved Plan of Allocation. The Plan of Allocation is described in more detail at the end of this Notice.

7. How much will my payment be?

Your share of the Net Settlement Fund will depend on several things, including the total value of Zymergen common stock represented by the valid Proofs of Claim that Class Members send in, compared to the value of your claim, all as calculated under the Plan of Allocation discussed below.

HOW YOU GET A PAYMENT – SUBMITTING A PROOF OF CLAIM

8. How can I get a payment?

To be eligible to receive a payment from the Settlement, you must submit a Proof of Claim. A Proof of Claim may be downloaded at www.ZymergenSecuritiesLitigation.com. Read the instructions carefully, fill out the Proof of Claim, include all the documents the form asks for, sign it, and **mail it to the Claims Administrator (to Zymergen Securities Litigation, Claims Administrator, c/o Verita Global, P.O. Box 301135, Los Angeles, CA 90030-1135) or submit it online at www.ZymergenSecuritiesLitigation.com so that it is postmarked or received no later than October 11, 2026**.

9. When would I get my payment?

The Court will hold a Settlement Hearing on October 13, 2026, at 10:00 a.m., to decide whether to approve the Settlement. If the Court approves the Settlement, there might be appeals. It is always uncertain whether appeals can be resolved, and if so, how long it would take to resolve them. It also takes time for all the Proofs of Claim to be processed. Please be patient.

10. What am I giving up to get a payment?

Unless you previously excluded yourself, you remain in the Class, and that means you cannot sue, continue to sue, or be part of any other lawsuit against Settling Defendants or the other "Released Defendant Parties" (as defined below) about the "Released Plaintiff's Claims" (as defined below) in this case. It also means that all of the Court's orders will apply to you and legally bind you. If the Settlement is approved, you will give up all Released Plaintiff's Claims, including "Unknown Claims" (as defined below), against the "Defendants' Released Persons" (as defined below):

- "Released Plaintiff's Claims" means all claims and causes of action of every nature and description, whether known or unknown, including Unknown Claims (as defined below), demands, losses, and rights, that have been or could have been asserted in the Litigation, whether arising under federal, state, common, or foreign law, or any other law, rule, or regulation, whether class or individual in nature, based on, arising out of, or in connection with both: (i) the purchase, acquisition, holding, sale, or disposition of Zymergen common stock purchased or acquired pursuant and/or traceable to the Registration Statement; and (ii) the allegations, acts, transactions, facts, events, matters, occurrences, disclosures, filings, representations, statements, or omissions that were or could have been alleged by Lead Plaintiff or other Class Members in the Litigation. Released Plaintiff's Claims do not include: (i) any claims related to the enforcement of the Settlement; or (ii) any derivative or ERISA claims. For the avoidance of doubt, Released Plaintiff's Claims do not include the claims alleged in *ZYM Liquidating Trust v. Hoffman, et al.*, Case No. CGC-25-626071 (S.F. Sup. Ct.).
- "Released Defendants' Claims" means any and all claims and causes of action of every nature and description whatsoever, including both known claims and Unknown Claims (as defined below), whether arising under federal, state, common, or foreign law, against the Releasing Plaintiff Parties (as defined below) that arise out of or relate in any way to the institution, prosecution, or settlement of the claims against Settling Defendants in the Litigation, except for claims relating to the enforcement of the Settlement.
- "Released Defendant Party" or "Released Defendant Parties" or "Defendants' Released Persons" means any or all of Settling Defendants and their and Zymergen's current and former officers, directors, agents, servants, representatives, parents, affiliates, subsidiaries, successors, predecessors, assigns, assignees, advisors, auditors, immediate family members, underwriters, insurers, reinsurers, employees, attorneys, and each other their respective heirs, executors, administrators, successors and assigns, in their capacities as such. For the avoidance of doubt, Zymergen and ZYM Liquidating Trust are not Released Defendant Parties.
- "Releasing Plaintiff Party" or "Releasing Plaintiff Parties" means Lead Plaintiff, all other plaintiffs in the Litigation, their respective attorneys, all other Class Members, and their respective current and former officers, directors, agents, parents, affiliates, subsidiaries, successors, predecessors, assigns, assignees, employees, and attorneys, in their capacities as such.
- "Unknown Claims" means: (a) any and all Released Plaintiff's Claims that the Releasing Plaintiff Parties do not know or suspect to exist in his, her, its, or their favor at the time of the release of such claims; and (b) any and all Released Defendants' Claims that any of the Released Defendant Parties do not know or suspect to exist in his, her, its, or their favor at the time of the release of such claims, and including, without limitation, those that, if known by him, her, it, or them might have affected his, her, its, or their decision(s) with respect to this Settlement. Unknown Claims include, without limitation, those claims in which some or all of the facts composing the claim may be unsuspected, undisclosed, concealed, or hidden. With respect to: (a) any and all Released Plaintiff's Claims against the Released Defendant Parties; and (b) any and all Released Defendants' Claims against the Releasing Plaintiff Parties, the Settling Parties stipulate and

agree that, upon the Effective Date, the Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have expressly waived, any and all provisions, rights, and protections conferred by California Civil Code §1542 and by any law of any state or territory of the United States, or principle of common law or foreign law, that is similar, comparable, or equivalent to California Civil Code §1542, which provides:

> A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

The Releasing Plaintiff Parties and Released Defendant Parties acknowledge that they may hereafter discover facts, legal theories, or authorities in addition to or different from those which he, she, it, or their counsel now knows or believes to be true with respect to the subject matter of the Released Plaintiff's Claims or Released Defendants' Claims, but: (a) the Releasing Plaintiff Parties shall expressly, fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Releasing Plaintiff Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Plaintiff's Claims against the Released Defendant Parties, known or unknown, suspected or unsuspected, contingent or non-contingent, accrued or unaccrued, whether or not concealed or hidden, which now exist, or heretofore have existed, or may hereafter exist, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities; and (b) the Released Defendant Parties shall expressly, fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Released Defendant Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Defendants' Claims against Lead Plaintiff, the Class, and Plaintiffs' Counsel, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. The Parties acknowledge, and the Releasing Plaintiff Parties and Released Defendant Parties shall be deemed by operation of law to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement of which this release is a part.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

The Court ordered that the law firm of Robbins Geller Rudman & Dowd LLP represents the Class Members, including you. These lawyers are called Lead Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

12. How will the lawyers be paid?

Lead Counsel will apply to the Court for an award of attorneys' fees not to exceed thirty percent (30%) of the Settlement Amount and for expenses, costs, and charges in an amount not to exceed $3,000,000 in connection with prosecuting the Action, plus interest on such fees and expenses at the same rate as earned by the Settlement Fund. In addition, Plaintiffs may seek up to $40,000 in the aggregate for their time and expenses incurred in representing the Class. Such sums as may be approved by the Court will be paid from the Settlement Fund.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or any part of it.

13. How do I tell the Court that I object to the proposed Settlement?

If you are a Class Member, you can comment on or object to the proposed Settlement, the proposed Plan of Allocation, and/or Lead Counsel's fee and expense application. You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object. You can write to the Court setting out your comment or objection. The Court will consider your views. All written objections and supporting papers should: (i) clearly identify the case name and number (*Wang v. Zymergen Inc., et al.*, No. 5:21-cv-06028-PCP); (ii) be submitted to the Court either by mailing them to the Clerk of the Court, United States District Court for the Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1st Street, Room 2112, San Jose, CA 95113, or by filing them in person at any location of the United States District Court for the Northern District of California; and (iii) be filed or postmarked on or before September 22, 2026. Include your name, address, telephone number, and your signature (even if you are represented by counsel), including the number of shares of Zymergen common stock you purchased or otherwise acquired pursuant and/or traceable to the Registration Statement, and whether any of those shares were sold, as well as the dates and prices for each such purchase, other acquisition or sale, and state with specificity your comments or the reasons why you object to the proposed Settlement, Plan of Allocation, and/or fee and expense application, including any legal and evidentiary support for such objection. Any objection must state whether it applies only to the objector, to a specific subset of the Class, or to the entire Class. You must also identify all other class action settlements in which you or your counsel have filed objections in the past five years. You must also include copies of documents demonstrating all of your purchase(s), acquisitions, and/or sale(s) of Zymergen common stock.

THE COURT'S SETTLEMENT HEARING

The Court will hold a hearing to decide whether to approve the proposed Settlement. You may attend and you may ask to speak, but you do not have to.

14. When and where will the Court decide whether to approve the proposed Settlement?

The Court will hold a Settlement Hearing at **10:00 a.m., on October 13, 2026**, before the Honorable P. Casey Pitts, at the United States District Court for the Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1st Street, San Jose, CA 95113. At the hearing, the Court will consider whether the Settlement and the Plan of Allocation are fair, reasonable, and adequate. If there are objections, the Court will consider them, even if you do not ask to speak at the hearing. The Court will listen to people who appear to speak at the hearing. The Court may also decide how much Lead Counsel and Plaintiffs will be paid. After the Settlement Hearing, the Court will decide whether to approve the Settlement and the Plan of Allocation. We do not know how long these decisions will take. You should be aware that the Court may change the date and time of the Settlement Hearing without another notice being sent to Class Members. If you want to attend the hearing, you should check with Lead Counsel or the Settlement website, www.ZymergenSecuritiesLitigation.com, beforehand to be sure that the date and/or time has not changed.

15. Do I have to attend the hearing?

No. Lead Counsel will answer any questions the Court may have. But, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary. Class Members do not need to appear at the hearing or take any other action to indicate their approval.

16. May I speak at the hearing?

If you object to the Settlement, the Plan of Allocation, and/or the fee and expense application, you may ask the Court for permission to speak at the Settlement Hearing. To do so, you must include with your objection (*see* question 13 above) a statement saying that it is your "Notice of Intention to Appear in the *Zymergen Securities Litigation*." Be sure to include your name, address, telephone number, your signature, the number of shares of Zymergen common stock you purchased, acquired, and/or sold and copies of documents evidencing those purchases, acquisitions, and/or sales. Persons who intend to object to the Settlement, the Plan of Allocation, and/or any awards to Lead Counsel or Plaintiffs and desire to present evidence at the Settlement Hearing must include in their written objections the identity of any witnesses they may call to testify and any exhibits they intend to introduce into evidence at the Settlement Hearing. Your notice of intention to appear must be sent to the Clerk of the Court so that it is ***received no later than September 22, 2026***.

IF YOU DO NOTHING

17. What happens if I do nothing?

If you do nothing, you will not receive any money from this Settlement.

GETTING MORE INFORMATION

18. How do I get more information?

This Notice contains only a summary of the terms of the proposed Settlement. For even more detailed information concerning the matters involved in this Action, you can obtain answers to common questions regarding the proposed Settlement by contacting the Claims Administrator toll-free at 1-888-858-5903 or via email at info@ZymergenSecuritiesLitigation.com. Reference is also made to the Stipulation, to the pleadings in support of the Settlement, to the Orders entered by the Court, and to the other Settlement related papers filed in the Action, which are posted on the Settlement website at www.ZymergenSecuritiesLitigation.com. You may also access the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at https://ecf.cand.uscourts.gov, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1st Street, Room 2112, San Jose, CA 95113, between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

PLAN OF ALLOCATION OF NET SETTLEMENT FUND AMONG CLASS MEMBERS

The Settlement Amount of $125 million together with any interest earned thereon is the "Settlement Fund." The Settlement Fund, less all taxes, tax expenses, notice and claims administration expenses, and approved fees and expenses (the "Net Settlement Fund") shall be distributed to Class Members who submit timely and valid Proofs of Claim to the Claims Administrator ("Authorized Claimants").

The objective of the Plan of Allocation is to equitably distribute the Net Settlement Fund among Class Members based on their respective alleged economic losses resulting from the securities law violations alleged in the Action.

To design this Plan, Lead Counsel conferred with Lead Plaintiff's damages expert. The Court may approve the Plan with or without modification, or approve another plan of allocation, without further notice to the Class. Any orders regarding modifications to this Plan will be posted at www.ZymergenSecuritiesLitigation.com.

The Plan of Allocation is not a formal damages analysis. The objective of the Plan is to equitably distribute the Net Settlement Fund among Class Members based on their respective alleged economic losses resulting from the securities law violations alleged in the Action. The calculations made pursuant to the Plan are not intended to be estimates of, nor indicative of, the amounts that Class Members may have been able to recover after a trial. Nor are the calculations pursuant to the Plan intended to be estimates of the amounts that will be paid to Authorized Claimants pursuant to the Settlement. The computations under the Plan are only a method to weigh the Claims of Authorized Claimants against one another for the purposes of making *pro rata* allocations of the Net Settlement.

In this case, Lead Plaintiff alleges that Settling Defendants omitted material facts from Zymergen's Registration Statement issued in connection with its initial public offering of common stock. Lead Plaintiff alleges that the Company revealed numerous material adverse facts that informed investors the Registration Statement contained untrue statements of material facts and omitted material facts, resulting in potentially recoverable damages. The Plan is intended to compensate investors who purchased or otherwise acquired Zymergen common stock pursuant and/or traceable to the Registration Statement and have a "Recognized Loss Amount" as described below.[6]

[6] Any transactions in Zymergen common stock executed outside regular trading hours for the U.S. financial markets shall be deemed to have occurred during the next trading session.

Based on the formulas stated below, a Recognized Loss Amount will be calculated for each purchase or acquisition of Zymergen common stock pursuant and/or traceable to the Registration Statement that is listed on the Claim Form and for which adequate documentation is provided. If a Recognized Loss Amount calculates to a negative number or zero under the formula below, that Recognized Loss Amount will be zero. An Authorized Claimant's "Recognized Claim" under the Plan will be the sum of their Recognized Loss Amounts.

The allocation is based on the following:

Initial Public Offering Price:	$31.00 per share
Closing Price on August 4, 2021:	$8.25 per share

For each share of Zymergen common stock purchased or otherwise acquired pursuant and/or traceable to the Registration Statement, and:

(a) sold prior to August 4, 2021, the Recognized Loss Amount will be ***the lesser of***: (i) the purchase price minus the sale price; and (ii) $31.00 minus the sale price;

(b) sold on or after August 4, 2021, or otherwise continued to hold, the Recognized Loss Amount will be ***the least of***: (i) the purchase price minus the sale price; (ii) $31.00 minus the sale price; (iii) the purchase price minus $8.25; and (iv) $22.75; or

(c) purchased on or after August 4, 2021, the Recognized Loss Amount will be $0.

For Class Members who made multiple purchases, acquisitions, or sales of Zymergen common stock, the First-In, First-Out ("FIFO") method will be applied to such holdings, purchases, acquisitions, and sales for purposes of calculating a claim. Under the FIFO method, sales of Zymergen will be matched, in chronological order, against Zymergen common stock purchased or acquired pursuant and/or traceable to the Registration Statement.

For purposes of calculations under this Plan, "purchase price" means the actual price paid, excluding any fees, commissions, and taxes, and "sale price" means the actual amount received, not deducting any fees, commissions, and taxes.

A purchase, acquisition, or sale of Zymergen common stock shall be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" date. All purchase, acquisition, and sale prices shall exclude any fees and commissions. The receipt or grant by gift, devise, or operation of law of Zymergen common stock shall not be deemed a purchase, acquisition, or sale of Zymergen common stock for the calculation of a claimant's recognized claim nor shall it be deemed an assignment of any claim relating to the purchase or acquisition of such share unless specifically provided in the instrument of gift or assignment. The receipt of Zymergen common stock in exchange for securities of any other corporation or entity shall not be deemed a purchase or acquisition of Zymergen common stock.

The Recognized Loss Amount on any portion of a purchase or acquisition that matches against ("covers") a "short sale" is zero. The Recognized Loss Amount on a "short sale" that is not covered by a purchase or acquisition is zero. In the event that a claimant establishes a short position in Zymergen stock pursuant and/or traceable to the Registration Statement, the earliest subsequent purchases or acquisitions that cover such short sales will not be entitled to recovery.

Zymergen common stock is the only security eligible for recovery under the Plan. Option contracts to purchase or sell Zymergen common stock are not securities eligible to participate in the Settlement. With respect to Zymergen common stock purchased or sold through the exercise of an option, the purchase/sale date of such shares is the exercise date and the purchase/sale price is the exercise price of the option.

If a claimant had a market gain with respect to his, her, or its overall transactions in Zymergen common stock, the value of the claimant's Recognized Claim will be zero, and the claimant will in any event be bound by the Settlement. If a claimant suffered an overall market loss with respect to their overall transactions in Zymergen common stock but that the market loss was less than the claimant's Recognized Claim calculated above, then the claimant's Recognized Claim calculated above, will be limited to the amount of the actual market loss. For purposes of determining whether a claimant had a market gain, or suffered a market loss, with respect to a claimant's overall transactions in Zymergen common stock, the Claims Administrator will determine the difference between the claimant's (i) Total Purchase Amount[7] and (ii) the sum of the Total Sales Proceeds[8] and Total Holding Value.[9]

The Net Settlement Fund will be distributed to Authorized Claimants on a *pro rata* basis, based on the relative size of their Recognized Claim. Specifically, a "Distribution Amount" will be calculated for each Authorized Claimant, which will be the Authorized Claimant's Recognized Claim divided by the total Recognized Claims of all Authorized Claimants, multiplied by the total amount in the Net Settlement Fund. No distributions will be made to Authorized Claimants who would otherwise receive a distribution of less than $10.00.

Distributions will be made to Authorized Claimants after all claims have been processed, after the Court has finally approved the Settlement, and after any appeals are resolved. If there is any balance remaining in the Net Settlement Fund after at least six (6) months from the initial date of distribution of the Net Settlement Fund (whether by reason of tax refunds, uncashed checks, or otherwise), the Claims Administrator shall, if feasible, reallocate such balance among Authorized Claimants in an equitable and economic fashion. These redistributions shall be repeated until the balance remaining in the Net Settlement Fund is no longer economically feasible to distribute to Class Members. Thereafter, any balance that still remains in the Net Settlement Fund shall be donated to non-sectarian, not for profit organization(s), to be recommended by Lead Counsel and approved by the Court.

Please contact the Claims Administrator or Lead Counsel if you disagree with any determinations made by the Claims Administrator regarding your Proof of Claim. If you are dissatisfied with the determinations, you may ask the Court, which retains jurisdiction over all Class Members and the claims administration process, to decide the issue by submitting a written request for review.

The Court has reserved jurisdiction to allow, disallow, or adjust the claim of any Class Member on equitable grounds.

Payment pursuant to the Plan of Allocation set forth above shall be conclusive against all Authorized Claimants. Settling Defendants, their respective counsel, and all other Released Defendant Parties will have no responsibility or liability whatsoever for the investment of the Settlement Fund, the distribution of the Net Settlement Fund, the Plan of Allocation, or the payment of any claim. No Person shall have any claim against Lead Plaintiff, Plaintiffs' Counsel, the Claims Administrator, or other Person designated by Lead Counsel, Settling Defendants, or Settling Defendants' Counsel based on distributions made substantially in accordance with the Stipulation and the Settlement contained therein, the Plan of Allocation, or further orders of the Court. All Class Members who fail to complete and submit a valid and timely Proof of Claim shall be barred from participating in distributions from the Net Settlement Fund (unless otherwise ordered by the Court), but otherwise shall be bound by all of the terms of the Stipulation, including the terms of any judgment entered and the releases given.

[7] The "Total Purchase Amount" is the total amount the claimant paid (excluding commissions and other charges) for Zymergen common stock purchased or otherwise acquired on or before August 3, 2021 pursuant and/or traceable to the Registration Statement.

[8] The Claims Administrator will match any sales of Zymergen common stock sold on or before August 4, 2021 in chronological order against Zymergen common stock purchased or acquired on or before August 3, 2021, pursuant and/or traceable to the Registration Statement. The total amount received (excluding commissions and other charges) for sales on or before August 4, 2021, will be the "Total Sales Proceeds."

[9] The Claims Administrator will ascribe a holding value equal to $8.25 for each Zymergen common share purchased or acquired pursuant and/or traceable to the Registration Statement and still held as of the close of trading on August 4, 2021. A claimant's total holding values for Zymergen common stock purchased or acquired pursuant and/or traceable to the Registration Statement that were still held at the close of trading on August 4, 2021 shall be the "Total Holding Value."

SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

If you purchased or acquired Zymergen common stock pursuant and/or traceable to the Registration Statement for the beneficial interest of an individual or organization other than yourself, the Court has directed that, WITHIN TEN (10) CALENDAR DAYS OF YOUR RECEIPT OF THE SUMMARY NOTICE, you either (a) provide to the Claims Administrator the name and last known email or physical address of each person or organization for whom or which you purchased or acquired such Zymergen common stock during such time period, or (b) request additional copies of the Summary Notice, which will be provided to you free of charge, and within ten (10) calendar days send via email or regular mail where an email address is not available, mail the Summary Notice directly to the beneficial owners of the Zymergen common stock referred to herein. If you choose to follow alternative procedure (b), upon such mailing, you must send a statement to the Claims Administrator confirming that the email was sent or the mailing was made as directed and retain the names, email addresses or physical addresses for any future mailings to Class Members. You are entitled to reimbursement from the Settlement Fund of your reasonable expenses actually incurred in connection with the foregoing, including reimbursement of postage expense and the cost of ascertaining the names and addresses of beneficial owners. Reasonable out-of-pocket expenses actually incurred in connection with the foregoing includes up to $0.03 for providing names, addresses and email addresses to the Claims Administrator per record; up to a maximum of $0.03 per Summary Notice emailed or mailed by you, plus postage at the rate used by the Claims Administrator. Your reasonable expenses will be paid upon request and submission of appropriate supporting documentation. All communications concerning the foregoing should be addressed to the Claims Administrator at notifications@veritaglobal.com or:

Zymergen Securities Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301135
Los Angeles, CA 90030-1135

DATED: June 22, 2026

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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

PROOF OF CLAIM AND RELEASE

I. GENERAL INSTRUCTIONS

1. To recover as a Member of the Class based on your claims in the action entitled *Wang v. Zymergen Inc., et al.*, No. 5:21-cv-06028-PCP (the "Action" or the "Litigation"), you must complete and, on page 6 hereof, sign this Proof of Claim and Release ("Claim Form"). If you fail to submit a properly addressed (as set forth in paragraph 3 below) Claim Form, postmarked or received by the date shown below, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed settlement of the Action (the "Settlement").[1]

2. Submission of this Claim Form, however, does not assure that you will share in the proceeds of the Settlement.

3. YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED CLAIM FORM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, NO LATER THAN OCTOBER 11, 2026, TO THE COURT-APPOINTED CLAIMS ADMINISTRATOR IN THIS CASE, AT THE FOLLOWING ADDRESS:

Zymergen Securities Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301135
Los Angeles, CA 90030-1135
Online Submissions: www.ZymergenSecuritiesLitigation.com

Do not mail or deliver your Claim Form to the Court, the Parties to the Action, or their counsel. Submit your Claim Form only to the Claims Administrator at the address set forth above. If you are NOT a Member of the Class (as defined below and in the Summary Notice and in the Notice of Proposed Settlement of Class Action (the "Notice")), DO NOT submit a Claim Form.

4. If you are a Member of the Class, you will be bound by the terms of any judgment entered in the Action, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A CLAIM FORM.

5. It is important that you completely read and understand the Notice, including the Plan of Allocation of the Net Settlement Fund set forth in the Notice. The Notice describes the proposed Settlement, how the Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement and Plan of Allocation are approved by the Court. The Notice (as well as the Stipulation) also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described therein and provided for herein.

II. CLAIMANT IDENTIFICATION

You are a Member of the Class if you purchased or otherwise acquired Zymergen Inc. ("Zymergen") common stock pursuant and/or traceable to the Registration Statement issued in connection with Zymergen's April 2021 initial public offering. Excluded from the Class are Defendants, the officers and directors of the Defendants, at all relevant times, members of their immediate families and their legal representatives, heirs, successors, or assigns and any entity in which Settling Defendants have or had a controlling interest. For the avoidance of doubt, any "Investment Vehicle" shall not be excluded from the Class.[2]

[1] This Claim Form incorporates by reference the definitions in the Stipulation of Settlement ("Stipulation"), which can be obtained at www.ZymergenSecuritiesLitigation.com.

[2] "Investment Vehicle" means any investment company or pooled investment fund, including, but not limited to, mutual fund families, exchange traded funds, fund of funds and hedge funds, and retirement accounts and employee benefit plans, in which Settling Defendants, or any of them, have, has, or may have a direct or indirect interest , or as to which Settling Defendants' affiliates may act as an investment advisor or manager, but in which any Settling Defendant alone or together with its, his, or her representative affiliates is not a majority owner or does not hold a majority beneficial interest.

Use Part I of this Claim Form entitled "Claimant Identification" to identify each purchaser or acquirer of record ("nominee"), if different from the beneficial purchaser or acquirer of the Zymergen common stock which forms the basis of this claim. THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL PURCHASER(S) OR ACQUIRER(S) OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER(S) OR ACQUIRER(S) OF THE ZYMERGEN COMMON STOCK UPON WHICH THIS CLAIM IS BASED.

All joint purchasers or acquirers must sign this Claim Form. Executors, administrators, guardians, conservators, and trustees must complete and sign this Claim Form on behalf of persons represented by them and their authority must accompany this Claim Form and their titles or capacities must be stated. The last four digits of the Social Security number (or full taxpayer identification number) and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

If you are acting in a representative capacity on behalf of a Member of the Class (for example, as an executor, administrator, trustee, or other representative), you must submit evidence of your current authority to act on behalf of that Member of the Class. Such evidence would include, for example, letters testamentary, letters of administration, or a copy of the trust documents.

One Claim Form should be submitted for each separate legal entity. Separate Claim Forms should be submitted for each separate legal entity (*e.g.*, a claim from joint owners should not include separate transactions of just one of the joint owners, and an individual should not combine his or her IRA transactions with transactions made solely in the individual's name). Conversely, a single Claim Form should be submitted on behalf of one legal entity, including all transactions made by that entity on one Claim Form, no matter how many separate accounts that entity has (*e.g.*, a corporation with multiple brokerage accounts should include all transactions made in all accounts on one Claim Form).

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request to, or may be requested to, submit information regarding their transactions in electronic files. All claimants MUST submit a manually signed paper Claim Form listing all their transactions whether or not they also submit electronic copies. If you wish to file your Claim Form electronically, you must contact the Claims Administrator at edata@veritaglobal.com to obtain the mandatory file layout. Any file not in accordance with the required electronic filing format will be subject to rejection. Only one Claim Form should be submitted for each legal entity (*see* above) and the ***complete*** name of the beneficial owner(s) of the securities must be entered where called for. Distribution payments must be made by check or electronic payment payable to the Authorized Claimant (beneficial account owner). The third-party filer shall not be the payee of any distribution payment check or electronic distribution payment. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant a written acknowledgement of receipt and acceptance of electronically submitted data. Do not assume that your file has been received until you receive this notification. If you do not receive such an email within 10 days of your submission you should contact the electronic filing department at edata@veritaglobal.com to inquire about your file and confirm it was received.

III. CLAIM FORM

Use Part II of this Claim Form entitled "Schedule of Transactions in Zymergen Common Stock" to supply all required details of your transaction(s) in Zymergen common stock. If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

On the schedules, provide all of the requested information with respect to ***all*** of your holdings, purchases or acquisitions, and ***all*** of your sales of Zymergen common stock, whether such transactions resulted in a profit or a loss. Failure to report all such transactions may result in the rejection of your claim.

List these transactions separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

For short-sale transactions, the date of covering a "short sale" is deemed to be the date of purchase of Zymergen common stock, and the date of a "short sale" is deemed to be the date of sale of Zymergen common stock.

For each transaction, you must provide, together with this Claim Form, copies of stockbroker confirmation slips, stockbroker statements, or other documents adequately evidencing your transactions in Zymergen common stock. If any such documents are not in your possession, please obtain a copy or equivalent documents from your broker because these documents are necessary to prove and process your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim. **THE PARTIES DO NOT HAVE INFORMATION ABOUT YOUR TRANSACTIONS IN ZYMERGEN COMMON STOCK.**

PLEASE NOTE: As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her, or its *pro rata* share of the Net Settlement Fund. If the prorated payment to any Authorized Claimant calculates to less than $10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

Official Office Use Only

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Wang v. Zymergen Inc., et al.

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

PROOF OF CLAIM AND RELEASE

Must Be Postmarked (if Mailed) or Received (if Submitted Online) No Later Than October 11, 2026

ZYM2

Please Type or Print in the Boxes Below
Must use Black or Blue Ink or your claim may be deemed deficient.

REMEMBER TO ATTACH COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS IN ZYMERGEN COMMON STOCK. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM OR RESULT IN REJECTION OF YOUR CLAIM.

PART I. CLAIMANT IDENTIFICATION

Last Name | M.I. | First Name

Last Name (Co-Beneficial Owner) | M.I. | First Name (Co-Beneficial Owner)

○ IRA ○ Joint Tenancy ○ Employee ○ Individual ○ Other ______ (specify)

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Social Security Number (Last 4 digits) or Taxpayer Identification Number —

Telephone Number (Primary Daytime) — —

Telephone Number (Alternate) — —

Email Address

MAILING INFORMATION

Address

Address (cont.)

City | State | ZIP Code

Foreign Province | Foreign Postal Code | Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB	CB	ATP KE ICI	BE DR EM	FL ME ND	OP RE SH	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY

PART II. SCHEDULE OF TRANSACTIONS IN ZYMERGEN COMMON STOCK

A. Number of shares of Zymergen common stock held at the close of trading on April 20, 2021 (must be documented). If none, write "zero" or "0": Proof Enclosed? Y N

B. Purchases or acquisitions of Zymergen common stock from April 21, 2021 through August 4, 2021, inclusive:[1]

PURCHASES

	Trade Date(s) (List Chronologically) MM / DD / YYYY	Number of Shares Purchased or Acquired	Total Purchase or Acquisition Price (Excluding commissions, taxes, and fees)	Proof of Purchase/ Acquisition Enclosed
1.	/ /		$ .00	Y N
2.	/ /		$ .00	Y N
3.	/ /		$ .00	Y N
4.	/ /		$ .00	Y N
5.	/ /		$ .00	Y N

IMPORTANT: (i) If any purchase listed covered a "short sale," please mark Yes: Yes

(ii) If you received shares through an acquisition or merger, please identify the date, the share amount and the company acquired:

MM / DD / YYYY   Merger Shares: Company:

C. Sales of Zymergen common stock from April 21, 2021 through August 4, 2021, inclusive:

SALES

	Trade Date(s) (List Chronologically) MM / DD / YYYY	Number of Shares Sold	Total Sales Price (Excluding commissions, taxes and fees)	Proof of Sale Enclosed?
1.	/ /		$ .00	Y N
2.	/ /		$ .00	Y N
3.	/ /		$ .00	Y N
4.	/ /		$ .00	Y N
5.	/ /		$ .00	Y N

D. Number of shares of Zymergen common stock held at the close of trading on August 4, 2021: Proof Enclosed? Y N

If you require additional space, attach extra schedules in the same format as above. Sign and print your name and the last four digits of your Social Security/Taxpayer Identification Number on each additional page.

YOU MUST READ THE RELEASE AND SIGN THE CERTIFICATION ON PAGE 6. FAILURE TO SIGN THE CERTIFICATION MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.

[1] The eligible purchase period is from April 21, 2021 through August 3, 2021. Information requested about your purchases on August 4, 2021 is needed only for the Claims Administrator to confirm that you have reported all relevant transactions. Purchases on August 4, 2021 are not eligible for a recovery because they were made outside the Class Period.

IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

I (We) submit this Claim Form under the terms of the Stipulation described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the Northern District of California with respect to my (our) claim as a Member of the Class and for purposes of enforcing the releases set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of the Stipulation and any judgment that may be entered in the Action, including the releases and the covenants set forth herein. I (We) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so. I (We) have not submitted any other claim covering the same purchases, acquisitions, or sales of Zymergen common stock during the relevant period and know of no other Person having done so on my (our) behalf.

V. RELEASES

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release from the "Released Plaintiff's Claims" (as defined below) each and all of the "Released Defendant Parties" (as defined below).

2. "Released Plaintiff's Claims" means all claims and causes of action of every nature and description, whether known or unknown, including Unknown Claims (as defined below), demands, losses, and rights, that have been or could have been asserted in the Litigation, whether arising under federal, state, common, or foreign law, or any other law, rule, or regulation, whether class or individual in nature, based on, arising out of, or in connection with both: (i) the purchase, acquisition, holding, sale, or disposition of Zymergen common stock purchased or acquired pursuant and/or traceable to the Registration Statement; and (ii) the allegations, acts, transactions, facts, events, matters, occurrences, disclosures, filings, representations, statements, or omissions that were or could have been alleged by Lead Plaintiff or other Class Members in the Litigation. Released Plaintiff's Claims do not include: (i) any claims related to the enforcement of the Settlement; or (ii) any derivative or ERISA claims. For the avoidance of doubt, Released Plaintiff's Claims do not include the claims alleged in *ZYM Liquidating Trust v. Hoffman, et al.*, Case No. CGC-25-626071 (S.F. Sup. Ct.).

3. "Released Defendant Party" or "Released Defendant Parties" or "Defendants' Released Persons" means any or all of Settling Defendants and their and Zymergen's current and former officers, directors, agents, servants, representatives, parents, affiliates, subsidiaries, successors, predecessors, assigns, assignees, advisors, auditors, immediate family members, underwriters, insurers, reinsurers, employees, attorneys, and each of their respective heirs, executors, administrators, successors and assigns, in their capacities as such. For the avoidance of doubt, Zymergen and the ZYM Liquidating Trust are not Released Defendant Parties.

4. "Released Defendants' Claims" means any and all claims and causes of action of every nature and description whatsoever, including both known claims and Unknown Claims (as defined below), whether arising under federal, state, common, or foreign law, against the Releasing Plaintiff Parties that arise out of or relate in any way to the institution, prosecution, or settlement of the claims against Settling Defendants in the Litigation, except for claims relating to the enforcement of the Settlement.

5. "Unknown Claims" means: (a) any and all Released Plaintiff's Claims that the Releasing Plaintiff Parties do not know or suspect to exist in his, her, its, or their favor at the time of the release of such claims; and (b) any and all Released Defendants' Claims that any of the Released Defendant Parties do not know or suspect to exist in his, her, its, or their favor at the time of the release of such claims, and including, without limitation, those that, if known by him, her, it, or them, might have affected his, her, its, or their decision(s) with respect to this Settlement. Unknown Claims include, without limitation, those claims in which some or all of the facts composing the claim may be unsuspected, undisclosed, concealed, or hidden. With respect to: (a) any and all Released Plaintiff's Claims against the Released Defendant Parties; and (b) any and all Released Defendants' Claims against the Releasing Plaintiff Parties, the Settling Parties stipulate and agree that, upon the Effective Date, the Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have expressly waived, any and all provisions, rights, and protections conferred by California Civil Code §1542 and by any law of any state or territory of the United States, or principle of common law or foreign law, that is similar, comparable, or equivalent to California Civil Code §1542, which provides:

> A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

The Releasing Plaintiff Parties and Released Defendant Parties acknowledge that they may hereafter discover facts, legal theories, or authorities in addition to or different from those which he, she, it, or their counsel now knows or believes to be true with respect to the subject matter of the Released Plaintiff's Claims or Released Defendants' Claims, but: (a) the Releasing Plaintiff Parties shall expressly, fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Releasing Plaintiff Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Plaintiff's Claims against the Released Defendant Parties, known or unknown, suspected or unsuspected, contingent or non-contingent, accrued or unaccrued, whether or not concealed or hidden, which now exist, or heretofore have existed, or may hereafter exist, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities; and (b) the Released Defendant Parties shall expressly, fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Released Defendant Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Defendants' Claims against Lead Plaintiff, the Class, and Plaintiffs' Counsel, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. The Parties acknowledge, and the Releasing Plaintiff Parties and Released Defendant Parties shall be deemed by operation of law to have acknowledged, that the foregoing waiver was separately bargained for and a key element of the Settlement of which this release is a part.

6. These releases shall be of no force or effect unless and until the Court approves the Stipulation and the Settlement becomes effective on the Effective Date.

7. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any claim or matter released pursuant to this release or any other part or portion thereof.

8. I (We) hereby warrant and represent that I (we) have included information about all of my (our) purchases, acquisitions, and sales of Zymergen common stock that occurred during the relevant period and the number of shares of Zymergen common stock held by me (us) at the close of trading on April 20, 2021 and August 4, 2021.

I (We) declare under penalty of perjury under the laws of the United States of America that the foregoing information supplied by the undersigned is true and correct.

EXECUTED THIS _________ **DAY OF** ________________________ **in** ____
(Month/Year) **(City/State/Country)**

____
(Sign your name here)

____
(Sign your name here)

____
(Type or print your name here)

____
(Type or print your name here)

____
(Capacity of person(s) signing, *e.g.*,
Beneficial Purchaser or Acquirer, Executor or Administrator)

____
(Capacity of person(s) signing, *e.g.*,
Beneficial Purchaser or Acquirer, Executor or Administrator)

ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.

Reminder Checklist:

1. Please sign the above release and acknowledgment.
2. If this Claim is being made on behalf of Joint Claimants, then both must sign.
3. Remember to attach copies of supporting documentation, if available.
4. **Do not send** originals of certificates.
5. Keep a copy of your Claim Form and all supporting documentation for your records.
6. If you desire an acknowledgment of receipt of your Claim Form, please send it Certified Mail, Return Receipt Requested.
7. If you move, please send your new address to the address below.
8. **Do not use red pen or highlighter** on the Claim Form or supporting documentation.

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR MAILED
NO LATER THAN OCTOBER 11, 2026, ADDRESSED AS FOLLOWS:

Zymergen Securities Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301135
Los Angeles, CA 90030-1135
Online Submissions: www.ZymergenSecuritiesLitigation.com

EXHIBIT C

verita

1 McInnis Parkway
Suite 250
San Rafael, CA 94903

July 13, 2026

«FirstName» «LastName»
«Company»
«Addr1»
«Addr2»
South Bend, IN 46601
«FCountry»

Re: **Zymergen Securities Litigation**

Dear «GENDER» «LastName»:

Please find enclosed the Summary Notice of Proposed Settlement of Class Action for the above referenced litigation. Please note both the class period and the designated eligible securities described on page one of the full Notice, specifically the inclusion of all persons and entities who purchased or otherwise acquired Zymergen Inc. ("Zymergen" or the "Company") common stock pursuant and/or traceable to the registration statement and prospectus issued in connection with its April 2021 initial public offering (the "Class" or "Class Members"). In addition, **the Notice provides that the Claim Filing Deadline is October 11, 2026.**

If you provided a data file of names and addresses for mailing in response to the previous Notice of Pendency of Class Action sent to you in September 2023, you should not provide those names and addresses again as we have already mailed the Notice to those beneficial owners. Please only provide new names and addresses for your clients who may be Class Members.

Please pay particular attention to the "Special Notice to Securities Brokers and Other Nominees" on page twelve of the full Notice which states, in part: If you purchased or acquired Zymergen common stock pursuant and/or traceable to the Registration Statement for the beneficial interest of an individual or organization other than yourself, the Court has directed that, WITHIN TEN (10) CALENDAR DAYS OF YOUR RECEIPT OF THE SUMMARY NOTICE, you either (a) provide to the Claims Administrator the name and last known email or physical address of each person or organization for whom or which you purchased or acquired such Zymergen common stock during such time period, or (b) request additional copies of the Summary Notice, which will be provided to you free of charge, and within ten (10) calendar days send via email or regular mail where an email address is not available, mail the Summary Notice directly to the beneficial owners of the Zymergen common stock referred to herein. If you choose to follow alternative procedure (b), upon such mailing, you must send a statement to the Claims Administrator confirming that the email was sent or the mailing was made as directed and retain the names, email addresses or physical addresses for any future mailings to Class Members. You are entitled to reimbursement from the Settlement Fund of your reasonable expenses actually incurred in connection with the foregoing, including reimbursement of postage expense and the cost of ascertaining the names and addresses of beneficial owners. Reasonable out-of-pocket expenses actually incurred in connection with the foregoing includes up to $0.03 for providing names, addresses and email addresses to the Claims Administrator per record; up to a maximum of $0.03 per Summary Notice emailed or mailed by you, plus postage at the rate used by the Claims Administrator.

Please do not make your own copies of the Proof of Claim Form, as copies may not be accepted for processing. Additional copies of the appropriate documents may be requested by contacting us at notifications@veritaglobal.com. If we conduct the necessary mailing on your behalf, please submit names and addresses either via email to notifications@veritaglobal.com, via CD Rom to the above address or contact us to obtain secure FTP transmission instructions. Mailing labels will be accepted, but you may be requested to provide an additional copy of the address information you send. Do not include any confidential information that should not appear on a mailing label.

The data provided must be in one of the following formats: ASCII Fixed Length file, ASCII Tab Delimited file, or Microsoft Excel spreadsheet. Your request must also specify the case name and Control Total(s) (for example, the total number of name and address records provided) for each file submission. If you have any questions, please email notifications@veritaglobal.com.

Sincerely,
Verita Global

EXHIBIT D

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CLASS ACTION

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

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED ZYMERGEN INC. ("ZYMERGEN") COMMON STOCK PURSUANT AND/OR TRACEABLE TO THE REGISTRATION STATEMENT AND PROSPECTUS ISSUED IN CONNECTION WITH ITS APRIL 2021 INITIAL PUBLIC OFFERING ("CLASS" OR "CLASS MEMBERS")

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

YOU ARE HEREBY NOTIFIED that a hearing will be held on October 13, 2026, at 10:00 a.m., before the Honorable P. Casey Pitts at the United States District Court, Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1st Street, San Jose, CA 95113, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned action ("Action") as set forth in the Stipulation of Settlement ("Stipulation") for $125,000,000 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the Action with prejudice; (3) to award Lead Counsel attorneys' fees and expenses and awards to Plaintiffs pursuant to 15 U.S.C. §77z-1(a)(4) out of the Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action ("Notice"), which is discussed below), and, if so, in what amounts; and (4) the Plan of Allocation should be approved by the Court as fair, reasonable, and adequate.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE SETTLEMENT OF THIS ACTION, AND YOU MAY BE ENTITLED TO SHARE IN THE NET SETTLEMENT FUND.

To share in the distribution of the Net Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form ("Proof of Claim") by mail **(postmarked no later than October 11, 2026)** or electronically via the website **(no later than October 11, 2026)**. Failure to submit your Proof of Claim by October 11, 2026, will subject your claim to rejection and preclude you from receiving any of the recovery in connection with the Settlement of this Action. If you purchased or acquired Zymergen common stock pursuant and/or traceable to the Registration Statement issued in connection with Zymergen's April 2021 initial public offering, you will be bound by the Settlement and any judgment and releases entered in the Action, including, but not limited to, the Judgment, whether or not you submit a Proof of Claim.

You may review the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), access the Proof of Claim, and find the Stipulation (which, among other things, contains definitions for the defined terms used in this Summary Notice) and other Settlement documents, online at www.ZymergenSecuritiesLitigation.com, or by writing to:

Zymergen Securities Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301135
Los Angeles, CA 90030-1135
Telephone: 1-888-858-5903
info@ZymergenSecurities.com

Inquiries should NOT be directed to Settling Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim, may be made to Lead Counsel:

ROBBINS GELLER RUDMAN & DOWD LLP
Ellen Gusikoff Stewart
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 1-800-449-4900
settlementinfo@rgrdlaw.com

No further exclusion opportunity is being provided under the Settlement. Because no Class Member validly excluded themselves previously when notice was provided, you will be bound by any judgment entered by the Court in this Litigation (including the releases provided for therein) whether or not you submit a Proof of Claim.

IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, AND/OR THE REQUEST BY LEAD COUNSEL FOR AN AWARD OF ATTORNEYS' FEES NOT TO EXCEED 30% OF THE SETTLEMENT AMOUNT AND EXPENSES NOT TO EXCEED $3,000,000, PLUS INTEREST ON BOTH AMOUNTS, AND/OR THE AWARDS TO PLAINTIFFS PURSUANT TO 15 U.S.C. §77z-1(a)(4) IN CONNECTION WITH THEIR REPRESENTATION OF THE CLASS. ANY OBJECTIONS MUST BE FILED WITH THE COURT **BY SEPTEMBER 22, 2026,** IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

DATED: June 22, 2026

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CLASS ACTION

Legal Notice
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JONNIE HOMYK, et al.,
Plaintiffs,
v.
CHEMOCENTRYX, INC. et al.,
Defendants

Master File No. 4:21-cv-03343-JST *and related case*, No. 4:21-cv-04357

SUMMARY NOTICE OF (I) PROPOSED CLASS ACTION SETTLEMENT; (II) SETTLEMENT HEARING; AND (III) MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES

TO: All persons who purchased or otherwise acquired the common stock of ChemoCentryx, Inc. ("ChemoCentryx" or the "Company") from November 26, 2019 through May 6, 2021, inclusive (the "Class Period"), and were damaged thereby (the "Class")[1]:

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS WILL BE AFFECTED BY A CLASS ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED, that Class Representative Indiana Public Retirement System on behalf of itself and the Court-certified Class, has reached a proposed settlement of the above-captioned securities class action (the "Action") for **$69,000,000** in cash (the "Settlement"). If approved, the Settlement will resolve all claims in the Action.

The Action involves allegations that ChemoCentryx and its former President and Chief Executive Officer, Dr. Thomas J. Schall (together, "Defendants") violated the federal securities laws. Class Representative alleges that Defendants made material misrepresentations during the Class Period regarding ChemoCentryx's ADVOCATE study, the Company's Phase 3 clinical trial of avacopan, and the Company's communications with the FDA related to the approval of avacopan, in violation of Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), that Schall controlled ChemoCentryx when the alleged misstatements were made, in violation of Section 20(a) of the Exchange Act, and that Schall sold ChemoCentryx stock while in possession of material non-public information about avacopan, in violation of Section 20A of the Exchange Act. Defendants deny all allegations in the Action and deny any violations of the federal securities laws.[2]

A hearing (the "Settlement Hearing") will be held on **October 29, 2026, at 2:00 p.m. Pacific time**, before the Honorable Jon S. Tigar of the United States District Court for the Northern District of California, by Zoom videoconference, to determine: (i) whether the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) whether the Action should be dismissed with prejudice against Defendants, and the Releases specified and described in the Stipulation (and in the Settlement Notice) should be granted; (iii) whether the proposed Plan of Allocation should be approved as fair and reasonable; and (iv) whether Class Counsel's motion for attorneys' fees in an amount not to exceed 22% of the Settlement Fund and payment of expenses in an amount not to exceed $5 million should be approved. **If you plan to attend the hearing, you should check the case website, www.ChemoCentryxSecuritiesLitigation.com to obtain information about how to access the Settlement Hearing and to confirm that no change to the date or time of the hearing has been made.** Any updates regarding the Settlement Hearing, including any changes to the date or time of the hearing or updates regarding in-person or remote appearances at the hearing, will be posted to the case website, www.ChemoCentryxSecuritiesLitigation.com.

If you are a member of the Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Settlement Fund. This notice provides only a summary of the information contained in the full Notice of (I) Proposed Class Action Settlement; (II) Settlement Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses (the "Settlement Notice"). You may obtain copies of the Settlement Notice and the Claim Form on the case website, www.ChemoCentryxSecuritiesLitigation.com; by contacting the Claims Administrator at: *ChemoCentryx Securities Litigation*, c/o Kroll Settlement Administration, P.O. Box 5013, New York, NY 10150-5013; by calling toll free 1-833-522-2606; or by emailing info@ChemoCentryxSecuritiesLitigation.com.

If you are a Class Member, in order to be eligible to receive a payment from the Settlement, you must submit a Claim Form ***postmarked* (if mailed) or online by no later than October 1, 2026**. To submit a claim online, visit www.ChemoCentryxSecuritiesLitigation.com. If you are a Class Member and do not submit a proper Claim Form, you will not be eligible to receive a payment from the Settlement, but you will nevertheless be bound by any judgments or orders entered by the Court in the Action.

Any objections to the proposed Settlement, the proposed Plan of Allocation, or Class Counsel's motion for attorneys' fees and expenses must be filed with the Court and delivered to Class Counsel and Defendants' Counsel or emailed to Class Counsel and Defendants' Counsel such that they are ***filed or postmarked* no later than September 21, 2026**, in accordance with the instructions set forth in the Settlement Notice. The Class was previously certified and, in connection with class certification, Class Members previously had the opportunity to request exclusion from the Class. There will not be a second opportunity to request exclusion in connection with the Settlement proceedings; however, if you previously requested exclusion, you may opt back into the Class by following the instructions in the Settlement Notice.

Please do not contact the Court, the Office of the Clerk of the Court, Defendants, or their counsel regarding this notice. All questions about this notice, the proposed Settlement, or your eligibility to participate in the Settlement should be directed to the Claims Administrator or Class Counsel.

Requests for the Settlement Notice and Claim Form should be made to:
ChemoCentryx Securities Litigation
c/o Kroll Settlement Administration
P.O. Box 5090, New York, NY 10150-5090, (833) 754-8921
info@ChemoCentryxSecuritiesLitigation.com
www.ChemoCentryxSecuritiesLitigation.com

All other inquiries should be made to Class Counsel:
BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
Jonathan D. Uslaner, Esq.
212 Avenue of the Stars, Suite 2575
Los Angeles, CA 90067
(800) 380-8496, settlements@blbglaw.com

By Order of the Court

[1] Certain persons and entities are excluded from the Class by definition and others are excluded pursuant to their prior request. The full definition of the Class, including a complete description of who is excluded from the Class, is set forth in the full Settlement Notice referred to herein.

[2] Capitalized terms not otherwise defined herein shall have the same meaning as in the Revised Stipulation and Agreement of Settlement dated May 15, 2026 ("Stipulation"). The Stipulation can be viewed at www.ChemoCentryxSecuritiesLitigation.com.

BUSINESS & FINANCE

Individuals Flock to AI Trades

HWA CHENG/AFP/GETTY IMAGES

Individual investors plugged $194 million into Intel so far this month, Vanda's data show.

Continued from page B1

member. Compare that with the $194 million they plugged into **Intel**, and the $56 million to the AI cloud company **Iren**.

For years, ordinary investors were the Mag Seven's most loyal and enthusiastic fans, plowing into the stocks through the early days of the AI race, the DeepSeek scare of early 2025 and the tariff turmoil last spring. But the members of the group have since headed in very different directions. In recent months, individual traders turned their attention away from the trillion-dollar firms funding the AI build-out and toward those making the chips, cooling systems and electric power it requires.

"The Mag Seven for years were the market darlings," said Bret Kenwell, U.S. investment analyst at eToro. Now, he said, individual investors are "following the money, figuratively and literally."

That isn't to say that individual traders are backing away from markets. Retail activity surged to new records in May and June, according to Scott Rubner, head of equity and equity derivatives strategy at Citadel Securities. Average daily stock-trading volumes during those months were more than double the 2024 average.

Even before Friday's drop, the momentum of the AI boom had hit a lull on Wall Street. The semiconductor rally, once red-hot, had chilled. Major U.S. indexes were trading sideways in a typical summer slowdown. Investors were looking ahead to second-quarter earnings reports—with their eyes peeled for evidence that the returns on AI investments would start to show up on corporate balance sheets.

"The market is looking for more signs of AI driving revenue growth or driving productivity gains," said Jonathan Cofsky, portfolio manager on the global technology and innovation team at Janus Henderson. "To continue supporting that level of spend, you need the returns to be pervasive throughout the economy."

AI stocks of all kinds are ultimately subject to similar concerns. On Friday, shares of small-cap chip makers, software companies and the Mag Seven all fell in tandem.

For some traders, the potential payoff is worth the risk. Davis Cantrell, a college student based near Atlanta, has been investing for roughly two years and closely following the biggest AI players over that period. But recently, the 19-year-old trimmed his Microsoft holdings, sold all of his Nvidia shares and rotated the funds into a few corners of the market that he finds more promising: space and quantum computing, two industries he thinks are poised to skyrocket as the AI revolution takes hold.

"I'm looking for aggressive, more high-risk growth stocks," he said. "I just don't see Microsoft and Nvidia fitting into that category anymore."

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CLASS ACTION

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK

NIZAR SAMI AYOUB, Individually and on Behalf of All Others Similarly Situated,
Plaintiff,
v.
SPECTRUM PHARMACEUTICALS, INC., THOMAS J. RIGA, and FRANCOIS J. LEBEL,
Defendants.

Case No. 1:22-cv-10292 (VEC)
(Consolidated)

SUMMARY NOTICE OF PENDENCY AND PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS OR ENTITIES WHO PURCHASED SPECTRUM PHARMACEUTICALS, INC. ("SPECTRUM") COMMON STOCK BETWEEN MAY 12, 2022 AND SEPTEMBER 22, 2022, INCLUSIVE (THE "CLASS PERIOD")

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

THE CUSIP NUMBER FOR SPECTRUM PHARMACEUTICALS, INC. (FORMERLY TRADED AS NASDAQ: SPPI) COMMON STOCK WAS 84763A108.

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Southern District of New York ("Court"), that the above-captioned action ("Litigation") has been certified as a class action, except for certain Persons and entities who are excluded from the Class by definition as set forth in the Stipulation of Settlement, dated June 1, 2026 ("Stipulation") and the detailed Notice of Pendency and Proposed Settlement of Class Action ("Notice"). The Stipulation and Notice can be viewed at www.strategicclaims.net/AyoubvSpectrum/.

YOU ARE ALSO HEREBY NOTIFIED that Nizar Sami Ayoub ("Lead Plaintiff"), and defendants Spectrum, Francois J. Lebel, and Thomas J. Riga ("Defendants") have reached a proposed settlement of the Litigation on behalf of the Class for $7 million in cash ("Settlement"). If approved by the Court, the Settlement will resolve all claims in the Litigation.

YOU ARE ALSO HEREBY NOTIFIED that a hearing will be held on November 20, 2026, at 10:00 a.m., before the Honorable Valerie E. Caproni at the United States District Court, Southern District of New York, Daniel P. Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, to determine whether: (1) the Settlement of the above-captioned Litigation as set forth in the Stipulation for $7 million in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the Litigation with prejudice; (3) to award Lead Counsel attorneys' fees and expenses out of the Settlement Fund (as defined in the Notice) and, if so, in what amounts; (4) to award Lead Plaintiff its costs and expenses in representing the Class out of the Settlement Fund and, if so, in what amount; and (5) the Plan of Allocation should be approved by the Court as fair, reasonable, and adequate.

The Court may decide to change the date and/or time of the Settlement Hearing, conduct the hearing by video or telephonic conference, or otherwise allow Class Members to appear at the hearing by telephone or videoconference, without further written notice to the Class. It is important that you check the Settlement website, www.strategicclaims.net/AyoubvSpectrum/, before making any plans to attend the Settlement Hearing. Any updates regarding the Settlement Hearing, including any changes to the date or time of the hearing or updates regarding in-person or telephonic appearances at the hearing, will be posted to the Settlement website. Also, if the Court requires or allows Class Members to participate in the hearing by telephone or videoconference, the access information will be posted to the website.

IF YOU PURCHASED SPECTRUM COMMON STOCK BETWEEN MAY 12, 2022, AND SEPTEMBER 22, 2022, INCLUSIVE, YOUR RIGHTS ARE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION.

To share in the distribution of the Net Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form ("Proof of Claim") to the Claims Administrator by mail **(postmarked no later than October 12, 2026)** or electronically via the Settlement website **(no later than 11:59 p.m. ET on October 12, 2026)**. Failure to submit your Proof of Claim by October 12, 2026, will subject your claim to rejection and preclude you from receiving any of the recovery in connection with the Settlement of this Litigation. If you are a Class Member and do not request exclusion from the Class (as described below), you will be bound by the Settlement and any judgment and release entered in the Litigation, including, but not limited to, the Judgment, whether or not you submit a Proof of Claim.

The Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement); the Proof of Claim; the Stipulation (which, among other things, contains definitions for the capitalized terms used in this Summary Notice); and other important documents may be accessed online at www.strategicclaims.net/AyoubvSpectrum/, or by writing to the Claims Administrator:

Spectrum Pharmaceuticals Securities Settlement
c/o Strategic Claims Services
P.O. Box 230
600 N. Jackson St., Ste. 205, Media, PA 19063
info@strategicclaims.net

Inquiries should NOT be directed to Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim, may be made to Lead Counsel:

KAPLAN FOX & KILSHEIMER LLP
Jeffrey P. Campisi
800 Third Avenue, 38th Floor, New York, NY 10022
Telephone: (212) 687-1980
jcampisi@kaplanfox.com

IF YOU DESIRE TO BE EXCLUDED FROM THE CLASS, YOU MUST SUBMIT A REQUEST FOR EXCLUSION SUCH THAT IT IS **POSTMARKED BY OCTOBER 30, 2026**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE. IF YOU PROPERLY EXCLUDE YOURSELF FROM THE CLASS, YOU WILL NOT BE BOUND BY ANY RELEASES, JUDGMENTS, OR ORDERS ENTERED BY THE COURT IN THE LITIGATION AND YOU WILL NOT RECEIVE ANY BENEFITS FROM THE SETTLEMENT. EXCLUDING YOURSELF FROM THE CLASS IS THE ONLY OPTION THAT MAY ALLOW YOU TO BE PART OF ANY OTHER CURRENT OR FUTURE LAWSUIT AGAINST DEFENDANTS CONCERNING THE CLAIMS BEING RESOLVED BY THE SETTLEMENT.

IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, THE REQUEST BY LEAD COUNSEL FOR AN AWARD OF ATTORNEYS' FEES NOT TO EXCEED 25% OF THE $7 MILLION SETTLEMENT AMOUNT AND EXPENSES NOT TO EXCEED $250,000, PLUS INTEREST ON BOTH AMOUNTS, AND/OR THE REQUEST FOR AN AWARD TO LEAD PLAINTIFF PURSUANT TO 15 U.S.C. §78u-4(a)(4). ANY OBJECTIONS MUST BE FILED WITH THE COURT AND SENT TO LEAD COUNSEL AND DEFENDANTS' COUNSEL **BY OCTOBER 30, 2026**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

DATED: JUNE 22, 2026

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK

NOTICE OF SALE

NOTICE OF PUBLIC SALE OF COLLATERAL
UNDER DELAWARE UNIFORM COMMERCIAL CODE

PLEASE TAKE NOTICE that, in accordance with applicable provisions of the Uniform Commercial Code as enacted in Delaware ("Delaware UCC"), notice is hereby given that a public sale shall be conducted of the secured grid promissory notes and related loan documents pledged by Art Finance Funding (IX), LLC ("Borrower") to Century Bank ("Secured Party") pursuant to the Commercial Pledge Agreements, dated as of May 21, 2020, August 31, 2020, November 12, 2020, August 3, 2021, and August 6, 2021, respectively, in each case executed between Secured Party and Borrower, to secure obligations owed under loans made by Secured Party to Borrower pursuant to the master Business Loan Agreement dated as of July 22, 2022, as described in Schedule A (the "Collateral").

The sale will take place at 3:30 p.m. EDT on August 25, 2026, via Zoom, as well as in person at Gibson, Dunn & Crutcher LLP, located at 200 Park Avenue, New York, New York 10166, Attention: Jason Myatt, Esq. Remote log-in credentials will be provided to registered bidders upon request.

The Collateral will be sold to the highest qualified bidder for cash, or the credit against outstanding indebtedness held by the Secured Party. Secured Party reserves the right to bid, assign its bid, and credit bid all or any portion of the secured indebtedness. The Collateral is offered "AS IS, WHERE IS," with all faults, and there is no warranty by the Secured Party relating to title, possession, quiet enjoyment, merchantability, fitness or the like in this disposition.

Under the applicable provisions of the Delaware UCC, Borrower is entitled, at no additional cost to it, to an accounting of all the unpaid indebtedness that is secured by the Collateral. Borrower may request such an accounting by contacting Secured Party's counsel, Jason Myatt, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, New York 10166; (212) 351-4085; and jmyatt@gibsondunn.com.

Secured Party reserves the right, in accordance with the Delaware UCC, prior to the auction date to cancel the sale in its entirety, or to adjourn the sale to a future date, or to modify, waive or amend any terms or conditions of the auction or impose any other terms or conditions on the auction and, if Secured Party, or an affiliate of Secured Party, deems appropriate, to reject any or all bids or to continue the auction to such time and place as Secured Party, or an affiliate of Secured Party, in its sole and absolute discretion, may deem fit.

To be a qualified bidder, each prospective bidder must, by 3:30 p.m. EDT on August 18, 2026: (1) execute and deliver to Jason Myatt, Esq. (by email at jmyatt@gibsondunn.com), a written certification on the form attached to Terms of Sale; (2) provide to Jason Myatt, Esq. (by email at jmyatt@gibsondunn.com) proof of readily available funds; and (3) register as a prospective bidder at the auction with Mannion Auctions, LLC by email to mdmannion@jpandr.com.

Interested parties that intend to bid on the Collateral should contact Jason Myatt, Esq. at (212) 351-4085 or jmyatt@gibsondunn.com to receive the Terms of Sale and bidding instructions.

Schedule A – Collateral

Collateral in which Borrower granted Secured Party a security interest includes, without limitation, the following assets of Borrower, together with any related loan documents, modifications, amendments, replacements, and extensions: (a) Secured Grid Promissory Note dated May 8, 2020, in the amount of $6,000,000 by and between Rose Petal Commodities, Inc. and Borrower; (b) Secured Grid Promissory Note dated November 14, 2023, in the amount of $5,000,000 by and between Adelson Galleries, Inc. and Borrower, which amended, restated, and replaced the Secured Grid Promissory Note dated July 27, 2020, in the amount of $2,500,000 by and between Adelson Galleries, Inc. and Borrower; (c) Secured Grid Promissory Note dated October 26, 2020, in the amount of $7,500,000 by and between Viana Art, LLC and Borrower; (d) Secured Grid Promissory Note dated March 2, 2019, in the amount of $3,500,000 by and between Carlton Rochell, Jr. and Borrower; (e) Secured Grid Promissory Note dated March 28, 2021, in the amount of $3,500,000 by and between Carlton Rochell, Jr. and Borrower; (f) Secured Grid Promissory Note dated November 1, 2023, in the amount of $7,500,000 by and between Carlton Rochell, Jr. and Borrower; and (g) Secured Grid Promissory Note dated July 29, 2021, in the amount of $4,000,000 by and between Petrarch, LLC d/b/a Electrum, and Tanis Antiquities, Ltd. and Borrower.

NXT Raises $1.8 Billion For Fund

By Isaac Taylor

Credit-focused NXT Capital raised $1.8 billion at the initial close of its eighth fund to invest through direct-lending.

The unit of Tokyo-listed **Orix's** U.S. arm makes loans from the fund to middle-market companies with adjusted pretax annual earnings of $5 million to $50 million.

The new pool, NXT Capital Senior Loan Fund VIII, marks the company's largest commingled vehicle so far. The amount raised for the initial close exceeds the total amount collected for each of the strategy's previous funds, which have typically wrapped up with roughly $1 billion.

The Chicago firm plans to invest from the new fund in U.S. companies that are backed by private-equity sponsors.

Earlier this year, NXT provided a senior credit facility to back CenterOak Partners' acquisition of Grismer Tire & Auto Service. The company operates vehicle service centers that offer tires, mechanical and electrical repair.

The firm in 2024 provided a $202 million senior credit facility to support Kian Capital Partners' recapitalization of Spatco Energy Solutions, a provider of service and maintenance for the fueling infrastructure market.

While NXT's strategy for the fund is sector-agnostic, the firm expects to make minimal investments in software businesses, which have become an area of concern for limited partners in private-credit vehicles.

Many nonbank direct lenders have looked to distance themselves from software investing this year after warnings from Wall Street leaders about the potential for artificial-intelligence disruptions of their business models.

Starting late last year, such alarms acutely affected private-credit focused business-development companies and interval funds, some of which have heavily backed software suppliers with loans. The warnings spooked many individual investors who were drawn to private credit in recent years, triggering a wave of requests to withdraw from evergreen credit funds and to cash in shares of private lenders such as BDCs and other semiliquid vehicles.

NXT gathered the fresh capital after a down year for direct-lending activity generally. The value of U.S. direct lending transactions fell 11% to $247 billion last year from 2024, PitchBook LCD said in December.

Declaration of Publication

I, Jonathan D. Carameros, as Senior Vice President, Settlement Administration at Verita Global LLC f/k/a Gilardi Settlement Administration Company in San Rafael, California, hereby certify that I caused the attached notice to be printed in said publication on July 20, 2026:

Name of Publication: The Wall Street Journal
Address: 1211 Avenue of the Americas
City, State, Zip: New York, NY 10036
Phone #: 1-800-568-7625
State of: New York

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of July 2026, at Danville, California.

JCarameros

Jonathan D. Carameros

Jul 20, 2026 8:00 AM Eastern Daylight Time

Robbins Geller Rudman & Dowd LLP Announces Proposed Settlement in the Zymergen Securities Litigation

Share

SAN DIEGO--(BUSINESS WIRE)--The following statement is being issued by Robbins Geller Rudman & Dowd LLP regarding the Zymergen Securities Litigation:

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

SUMMARY NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED ZYMERGEN INC. ("ZYMERGEN") COMMON STOCK PURSUANT AND/OR TRACEABLE TO THE REGISTRATION STATEMENT AND PROSPECTUS ISSUED IN CONNECTION WITH ITS APRIL 2021 INITIAL PUBLIC OFFERING ("CLASS" OR "CLASS MEMBERS")

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

YOU ARE HEREBY NOTIFIED that a hearing will be held on October 13, 2026, at 10:00 a.m., before the Honorable P. Casey Pitts at the United States District Court, Northern District of California, Robert F. Peckham Federal Building & United States Courthouse, 280 South 1st Street, San Jose, CA 95113, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned action ("Action") as set forth in the Stipulation of Settlement ("Stipulation") for $125,000,000 in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the Action with prejudice; (3) to award Lead Counsel attorneys' fees and expenses and awards to Plaintiffs pursuant to 15 U.S.C. §77z-1(a)(4) out of the Settlement Fund (as defined in the Notice of Proposed Settlement of Class Action ("Notice"), which is discussed below), and, if so, in what amounts; and (4) the Plan of Allocation should be approved by the Court as fair, reasonable, and adequate.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE SETTLEMENT OF THIS ACTION, AND YOU MAY BE ENTITLED TO SHARE IN THE NET SETTLEMENT FUND.

To share in the distribution of the Net Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form ("Proof of Claim") by mail **(postmarked no later than October 11, 2026)** or electronically via the website **(no later than October 11, 2026)**. Failure to submit your Proof of Claim by October 11, 2026, will subject your claim to rejection and preclude you from receiving any of the recovery in connection with the Settlement of this Action. If you purchased or acquired Zymergen common stock pursuant and/or traceable to the Registration Statement issued in connection with Zymergen's April 2021 initial public offering, you will be bound by the Settlement and any judgment and releases entered in the Action, including, but not limited to, the Judgment, whether or not you submit a Proof of Claim.

You may review the Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), access the Proof of Claim, and find the Stipulation (which, among other things, contains definitions for the defined terms used in this Summary Notice) and other Settlement documents, online at www.ZymergenSecuritiesLitigation.com, or by contacting the Claims Administrator:

Zymergen Securities Litigation
Claims Administrator
c/o Verita Global
P.O. Box 301135
Los Angeles, CA 90030-1135
Telephone: 1-888-858-5903
info@ZymergenSecuritiesLitigation.com

Inquiries should NOT be directed to Settling Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim, may be made to Lead Counsel:

ROBBINS GELLER RUDMAN & DOWD LLP
Ellen Gusikoff Stewart
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 1-800-449-4900
settlementinfo@rgrdlaw.com

No further exclusion opportunity is being provided under the Settlement. Because no Class Member validly excluded themselves previously when notice was provided, you will be bound by any judgment entered by the Court in this Litigation (including the releases provided for therein) whether or not you submit a Proof of Claim.

IF YOU ARE A CLASS MEMBER, YOU HAVE THE RIGHT TO OBJECT TO THE SETTLEMENT, THE PLAN OF ALLOCATION, AND/OR THE REQUEST BY LEAD COUNSEL FOR AN AWARD OF ATTORNEYS' FEES NOT TO EXCEED 30% OF THE SETTLEMENT AMOUNT AND EXPENSES NOT TO EXCEED $3,000,000, PLUS INTEREST ON BOTH AMOUNTS, AND/OR THE AWARDS TO PLAINTIFFS PURSUANT TO 15 U.S.C. §77z-1(a)(4) IN CONNECTION WITH THEIR REPRESENTATION OF THE CLASS. ANY OBJECTIONS MUST BE FILED WITH THE COURT **BY SEPTEMBER 22, 2026**, IN THE MANNER AND FORM EXPLAINED IN THE NOTICE.

DATED: June 22, 2026

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Contacts

Media Contact:
Robbins Geller Rudman & Dowd LLP
Shareholder Relations Department
Greg Wood
(619) 231-1058

Industry: Class Action Lawsuit Professional Services Legal

ROBBINS GELLER RUDMAN & DOWD LLP

NASDAQ:ZY

RELEASE VERSIONS

English

CONTACTS

Media Contact:
Robbins Geller Rudman & Dowd LLP
Shareholder Relations Department
Greg Wood
(619) 231-1058

Declaration of Publication

I, Jonathan D. Carameros, as Senior Vice President, Settlement Administration at Verita Global LLC f/k/a Gilardi Settlement Administration Company in San Rafael, California, hereby certify that I caused the attached notice to be published as a press release by the following wire service:

Name of Publication: BusinessWire
Address: 101 California Street 20th Floor
City, ST Zip: San Francisco, CA 94111
Phone #: 415-986-4422
State of: California

The press release was distributed on July 20, 2026 to the following media circuits offered by the above-referenced wire service:

1. National Newsline

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of July 2026, at Danville, California.

JCarameros

Jonathan D. Carameros