

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS (213113)
DANIEL J. PFEFFERBAUM (248631)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
shawnw@rgrdlaw.com
dpfefferbaum@rgrdlaw.com

– and –

ELLEN GUSIKOFF STEWART (144892)
PATTON L. JOHNSON (320631)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
elleng@rgrdlaw.com
pjohnson@rgrdlaw.com

Counsel for Plaintiffs

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

SUPPLEMENTAL DECLARATION OF
ROSS D. MURRAY REGARDING: (A)
CONTINUED DISSEMINATION OF
NOTICE; (B) UPDATE ON CALL CENTER
SERVICES AND WEBSITE; AND (C)
PROOFS OF CLAIM AND REQUESTS FOR
EXCLUSION RECEIVED

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

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

2 1. I am employed as a Vice President by Verita Global (“Verita”), located at 1 McInnis
3 Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s June 22, 2026 Order Granting
4 Motion for Preliminary Approval of Class-Action Settlement (ECF 659) (the “Notice Order”),
5 Verita was appointed as the Claims Administrator in connection with the proposed Settlement of
6 the above-captioned litigation (the “Litigation”). I oversaw the notice services provided by Verita
7 in accordance with the Notice Order.

8 2. I submit this declaration as a supplement to my previously filed declaration, the
9 Declaration of Ross D. Murray Regarding: (A) Notice Dissemination; (B) Publication; (C)
10 Establishment of Call Center Services and Website; and (D) Requests for Exclusion Received to
11 Date (ECF 663-3) (the “Initial Mailing Declaration”). The following statements are based on my
12 personal knowledge and information provided to me by other Verita employees, and, if called as
13 a witness, I could and would testify competently thereto.

14 **CONTINUED DISSEMINATION OF NOTICE**

15 3. As more fully detailed in the Initial Mailing Declaration, as of August 17, 2026,
16 Verita had mailed or emailed a total of 11,562 Summary Notices to potential Class Members and
17 their nominees. In addition, one institution reported that it anticipated sending Summary Notices
18 via email to 7,996 potential Class Members. *See* Initial Mailing Declaration, ¶11.

19 4. Since August 17, 2026, Verita has mailed or emailed an additional 57 Summary
20 Notices and two copies of the Notice of Proposed Settlement of Class Action (the “Notice”) and
21 Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) in
22 response to requests from potential Class Members, brokers, and nominees and as a result of mail
23 returned as undeliverable for which new addresses were identified and re-mailed to those new
24 addresses.¹ Therefore, as of October 5, 2026, Verita has mailed or emailed a total of 11,619
25 Summary Notices and two Claim Packages to potential Class Members and nominees.

26 ¹ Verita has re-mailed a total of seven Summary Notices to persons whose original mailings were
27 returned by the United States Postal Service (“USPS”) and for whom updated addresses were
28 provided to Verita by the USPS or were obtained through other means.

UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE

5. Verita continues to maintain the toll-free telephone number (1-888-858-5903) to accommodate inquiries about the Settlement from potential Class Members. Verita also monitors the case-dedicated e-mail address, info@ZymergenSecuritiesLitigation.com. Verita endeavors to respond timely to each telephone and e-mail inquiry and will continue to respond to Class Member inquiries via the toll-free telephone number and case dedicated e-mail address until the conclusion of the administration.

6. Verita also continues to maintain the website dedicated to the Settlement, www.ZymergenSecuritiesLitigation.com (the “Settlement Website”), to assist potential Class Members. Following Lead Counsel’s filing of their briefing in support of the Settlement on August 18, 2026, Verita posted to the Settlement Website copies of the papers in support of the Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation and the Motion for an Award of Attorneys’ Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §77z-1(a)(4). Verita will continue to operate, maintain, and, as appropriate, update the Settlement Website until the conclusion of the administration of this Settlement.

REQUESTS FOR EXCLUSION AND OBJECTIONS RECEIVED TO DATE

7. The Notice of Pendency of Class Action provided in 2023 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. At the time of the Initial Mailing Declaration, Verita reported that it had not received any requests for exclusion in response to either round of notices. *See* Initial Mailing Declaration, ¶16.

8. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Verita has not received any requests for exclusion.

CLAIMS RECEIVED TO DATE

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 5th day of October, 2026, at San Rafael, California.


ROSS D. MURRAY

ROSS D. MURRAY