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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **IN RE TALIS BIOMEDICAL SECURITIES**
14 **LITIGATION**

Case No. 3:22-cv-00105-SI

CLASS ACTION

15 THIS DOCUMENT RELATES TO:
16 ALL ACTIONS

**SECOND SUPPLEMENTAL
DECLARATION OF ROCHELLE J.
TEICHMILLER REGARDING
NOTICE DISSEMINATION AND
CLAIMS RECEIVED**

Judge: Hon. Susan Illston

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1 I, Rochelle J. Teichmiller, declare as follows:

2 1. I am a Project Manager of A.B. Data, Ltd.’s Class Action Administration Company
3 (“A.B. Data”), whose Corporate Office is located in Milwaukee, Wisconsin. Pursuant to its Order
4 Preliminarily Approving Settlement and Providing for Class Notice (the “Preliminary Approval
5 Order,” ECF No. 186), the Court approved the retention of A.B. Data as the Claims Administrator
6 for the above-captioned action (the “Action”) (*See* ECF No. 186 ¶ 8) (the “Preliminary Approval
7 Order”).¹

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9 2. I am over 21 years of age and am not a party to the Action. The following statements
10 are based on my personal knowledge and information provided by other A.B. Data employees
11 working under my supervision, and if called on to do so, I could and would testify competently
12 thereto.

13 3. I submit this Declaration in response to the Court’s Order Re: Plaintiffs’ Motion for
14 Final Approval of Class Settlement (ECF No. 199), and as a supplement to my earlier declarations
15 dated January 16, 2025 (ECF No. 191-5, the “Initial Mailing Declaration”) and February 28, 2025
16 (ECF No. 195, the “Supplemental Mailing Declaration”) which were previously filed with the
17 Court.
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19 **REPORT ON CLAIMS RECEIVED TO DATE**

20 4. Pursuant to the Preliminary Approval Order, Claims were to be submitted no later
21 than March 13, 2025. As previously reported, A.B. Data had received 393 Claims as of February
22 28, 2025. After February 28, 2025, the number of submissions increased sharply. For example,
23 1,016 Claims were received between February 28, 2025 and March 12, 2025, and 3,903 Claims
24 were received on or after March 13, 2025. This pattern of receiving numerous claims shortly before
25 and on the claims deadline is consistent with A.B. Data’s experience administrating securities class
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28 ¹ Unless otherwise defined in this Declaration, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated September 30, 2024 (the “Stipulation,” ECF No. 181-2).

1 settlements.

2 5. While the receipt and processing of Claims is ongoing, as of the date of this
3 Declaration, A.B. Data has received and processed a total of 5,312 Claims.

4 6. Based on Claims processed to date, A.B. Data has preliminarily identified 3,463
5 valid Claims with a combined Recognized Claim total of \$94,262,179.01.

6 7. Given the preliminary data above, A.B. Data estimates an average per-claim
7 recovery of \$9,384.93, or \$6,315.52 after fees and expenses.

8 8. The Settlement Class's robust response, with over 5,300 Claims submitted and over
9 \$94 million in Recognized Claims, demonstrates the effectiveness of the Notice program. The 5,312
10 Claims received represent 27% of the 19,876 Notices disseminated, a substantial participation rate
11 that is comparable to other securities class action settlements A.B. Data has administered.

12 9. The above data was obtained through A.B. Data's preliminary review of the Claims
13 received, based on the information provided by Claimants with their Claims. The complete
14 processing of these Claims will include steps to confirm the accuracy of the transactions claimed
15 and a review of the Claims for deficiencies, such as missing or incomplete documentation, duplicate
16 submissions, and claimed transactions that do not balance. A.B. Data will also provide Claimants
17 with an opportunity to correct any deficiencies in their Claims, will conduct thorough quality
18 control and quality assurance processes, and will perform fraud prevention reviews as part of its
19 normal claims processing procedures in order to ensure the validity and accuracy of all Claims. As
20 a result of these procedures, the number of damaged shares for the Claims received and ultimately
21 determined to be eligible for a Settlement payment is subject to change.

22 10. The possible acceptance of additional timely Claims (postmarked on or before the
23 March 13, 2025 deadline, but not received until after March 13, 2025), or additional late-filed
24 Claims, may also affect the above data. For example, the Claim count may increase if A.B. Data

1 receives additional timely Claims that were postmarked on or before March 13, 2025, but have not
2 yet been received due to delays in mail delivery. In addition, the Claim count may increase if late
3 Claims are received during the processing of the timely submitted Claims and the acceptance of
4 these Claims would not delay a future distribution. Pursuant to the Preliminary Approval Order,
5 Co-Lead Counsel, subject to final approval by the Court, shall have the discretion to accept late
6 Claims, so long as distribution of the Net Settlement Fund is not materially delayed thereby (*see*
7 Preliminary Approval Order, ¶ 11a).

9 11. After all Claims have been fully processed, quality assurance reviews performed,
10 and final administrative determinations have been made, A.B. Data will present its administrative
11 report on the Claims received for the Settlement to the Court, along with a proposed plan for
12 distribution, and will ultimately mail or wire Authorized Claimants their *pro rata* share of the Net
13 Settlement Fund, as calculated under the Plan of Allocation.

15 I declare, under penalty of perjury under the laws of the United States of America, that the
16 foregoing is true and correct to the best of my knowledge.

17 Executed on March 19, 2025.

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20 Rochelle Teichmiller