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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

11 **IN RE TALIS BIOMEDICAL SECURITIES**
12 **LITIGATION**

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

CLASS ACTION

13
14 **THIS DOCUMENT RELATES TO:**
15 **ALL ACTIONS**

SUPPLEMENTAL DECLARATION OF
ROCHELLE J. TEICHMILLER
REGARDING NOTICE
DISSEMINATION, THE SETTLEMENT
WEBSITE AND TELEPHONE
HELPLINE, REPORT ON OBJECTIONS
AND REQUESTS FOR EXCLUSIONS,
AND CLAIMS RECEIVED TO DATE

Judge: Hon. Susan Illston

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

8
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 pursuant to the Court’s November 22, 2024, Order
14 Preliminarily Approving Settlement and Providing for Class Notice (ECF No. 186), and as a
15 supplement to my earlier declaration, the Declaration of Rochelle J. Teichmiller Regarding Notice
16 Dissemination, Publication of the Summary Notice, the Settlement Website and Telephone
17 Helpline and Report on Objections and Requests for Exclusions (the “Initial Mailing Declaration”,
18 ECF. No. 191-5), dated January 16, 2025, attached as Exhibit E to the Declaration of Evan A.
19 Kubota in Support of Class Representative’s Motion for Final Approval of Proposed Class Action
20 Settlement and Lead Counsel’s Motion for Attorneys’ Fees, Litigation Expenses and Lead
21 Plaintiff’s Reasonable Costs and Expenses (the “Declaration of Evan A. Kubota”, ECF No. 191).

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24 **CONTINUED MAILING OF THE NOTICE**

25 4. As more fully stated in my Initial Mailing Declaration, as of January 16, 2025, A.B.
26 Data had mailed a total of 19,384 copies of the Postcard Notice (the “Notice”) to potential
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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 Settlement Class Members.

2 5. Since that time, A.B. Data has received 492 additional notice requests from potential
3 Settlement Class Members and nominees. Thus, as of the date of this Declaration, A.B. Data has
4 disseminated a total of 19,876 Notices. In addition, since January 16, 2025, A.B. Data has re-mailed
5 a total of 6 Notices to persons whose original mailings were returned by the U.S. Postal Service
6 (“USPS”) and for whom updated addresses were provided to A.B. Data by the USPS. As of the
7 date of this Declaration, A.B. Data has re-mailed a total of 43 Notices.
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9 **PUBLICATION OF THE SUMMARY NOTICE**

10 6. As reported in the Initial Mailing Declaration, A.B. Data caused the Summary
11 Notice to be published in *The Wall Street Journal* and *Investor’s Business Daily* on December 23,
12 2024. On that same day, the Summary Notice was released via *PR Newswire*.
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14 **UPDATE ON THE SETTLEMENT WEBSITE**

15 7. As reported in the Initial Mailing Declaration, A.B. Data designed, implemented,
16 and currently maintains the Settlement Website, which became operational beginning on June 7,
17 2024, as part of the class certification notice procedure. A.B. Data continues to maintain the website
18 designated for the Action (www.TalisSecuritiesLitigation.com). In compliance with the
19 Preliminary Approval Order, the website was updated on December 13, 2024, to include
20 information regarding the proposed Settlement, including the exclusion, objection, and claim filing
21 deadlines, and the date, time, and location of the Court’s Settlement Hearing. Copies of the Notice,
22 Long-Form Notice of Pendency and Proposed Settlement of Class Action (the “Long-Form
23 Notice”), Stipulation, Preliminary Approval Order, and other documents related to the Action are
24 posted on the website and available for download. The Settlement Website will continue to be
25 updated with relevant case information and Court Documents.
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27 8. In addition, the website includes the ability to file a claim online and a link to a
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1 document with detailed instructions for Settlement Class Members submitting their claims
2 electronically. Further, the website has contact information for A.B. Data and Lead Counsel,
3 including a toll-free telephone number that Settlement Class Members can use to obtain additional
4 information. The website is accessible 24 hours per day, 7 days a week.

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6 **UPDATE ON TELEPHONE HELPLINE**

7 9. A.B. Data continues to maintain a case-specific, toll-free telephone helpline, 877-
8 331-0411, with an interactive voice response system and live operators, to: (a) accommodate
9 potential Settlement Class Members with questions about the Action and the Settlement; and/or (b)
10 request a hard copy of the Long-Form Notice and Claim Form. The automated attendant answers
11 the calls and presents callers with a series of choices to respond to basic questions. Callers requiring
12 further help have the option of being transferred to a live operator during business hours. A.B. Data
13 will update the interactive voice response system as necessary throughout the administration of the
14 Settlement.
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16 **REPORT ON OBJECTIONS AND REQUESTS FOR EXCLUSION**

17 10. The Notice and Long-Form Notice informed potential Settlement Class Members
18 that requests for exclusion from the Settlement Class were to be sent to the Claims Administrator
19 such that they were received no later than February 21, 2025. The Long-Form Notice also set forth
20 the information that was required to be included in each request for exclusion.
21

22 11. As stated in the Initial Mailing Declaration, A.B. Data received two (2) requests for
23 exclusion as part of the class certification notice procedure, as previously reported to the Court
24 (ECF No. 174). As of the date of this Declaration, A.B. Data has not received any additional
25 requests for exclusion.

26 12. According to the Notice and Long-Form Notice, Settlement Class Members wishing
27 to object to the proposed Settlement, the proposed Plan of Allocation, or the request for attorneys'
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1 fees and reimbursement of litigation expenses are required to submit their objection in writing such
2 that the request is received by the Court no later than February 21, 2025. Despite these instructions,
3 Settlement Class Members sometimes send objections to the Claims Administrator. As of the date
4 of this Declaration, A.B. Data has not received any objections, and is not aware of any objections
5 being filed with the Court.
6

7 CLAIMS RECEIVED TO DATE

8 13. Pursuant to the Preliminary Approval Order, Claims are to be submitted no later
9 than March 13, 2025. While the receipt and processing of Claims is currently ongoing, as of the
10 date of this Declaration, A.B. Data has received a total of 393 Claims. As in most cases of this
11 nature, the vast majority of Claims are expected to be submitted on or around the claim filing
12 deadline.
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14 14. The Claims received, both before and after the claim filing deadline, will be subject
15 to a comprehensive review under A.B. Data's standard claims-processing procedures, which will
16 identify any deficiencies in the Claims received. A.B. Data will then communicate with Claimants
17 with deficient, but correctable, Claims to bring those Claims into compliance. Thus, A.B. Data is
18 unable to report on the number of valid Claims submitted at this time. After all Claims have been
19 fully processed, quality assurance reviews performed, and final administrative determinations have
20 been made, A.B. Data will present its administrative report on the Claims received for the
21 Settlement to the Court, along with a proposed plan for distribution, and will ultimately mail or
22 wire Authorized Claimants their *pro rata* share of the Net Settlement Fund, as calculated under the
23 Plan of Allocation.
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I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct to the best of my knowledge.

Executed on February 28, 2025.



Rochelle Teichmiller