



Settlement, for Issuance of Notice to the Class, and for Scheduling of Fairness Hearing entered on October 5, 2023 (NYSECF No. 112, the “Preliminary Approval Order”), A.B. Data was appointed to serve as Claims Administrator in connection with the above-captioned action (the “Action”). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. I submit this affidavit as a supplement to the Affidavit of Eric Schachter Regarding: (A) Mailing of Notice and Claim Form; (B) Publication of Summary Notice; (C) Report on Requests for Exclusion Received to Date, filed on December 19, 2023 (NYSECF No. 126, the “Mailing Affidavit”).

#### **UPDATE ON MAILING OF THE NOTICE PACKET**

3. Since the execution of the Mailing Affidavit, A.B. Data has continued to disseminate copies of the Notice and Proof of Claim and Release Form (together, the “Notice Packet”) in response to requests received from potential Settlement Class Members, brokers, and other nominees.

4. As more fully stated in the Mailing Affidavit, as of December 18, 2023, A.B. Data had mailed a total of 18,655 copies of the Notice Packet to potential Settlement Class Members.

5. Since the Mailing Affidavit, and as of the date of this affidavit, A. B. Data has caused an additional 4,460 Notice Packets to be mailed in response to correspondence received from potential Settlement Class members and/or nominees.

6. Therefore, as of the date of this affidavit, A.B. data has mailed a total of 23,115 Notice Packets to potential Settlement Class Members.

#### **UPDATE ON TELEPHONE HELPLINE AND WEBSITE**

7. A.B. Data established and continues to maintain a case-specific, toll-free telephone helpline to accommodate potential Settlement Class Members’ inquiries. This toll-free number,

866-778-9470, became operational on October 13, 2023. A.B. Data has promptly responded to, and will continue to promptly respond to, all inquiries to the Cloopen settlement telephone helpline, and will update the interactive voice response system with case-specific information.

8. To further assist potential Settlement Class Members, A.B. Data established and maintains a case-specific website, [www.CloopenSecuritiesLitigation.com](http://www.CloopenSecuritiesLitigation.com), dedicated to the Settlement. The settlement website includes general information regarding the case and its current status, as well as downloadable copies of the Notice, Proof of Claim, and other relevant court documents, including the Stipulation of Settlement, the pending motions in support of approval of the Settlement, Plan of Allocation, and Fee and Expense Application. It also provides Settlement Class Members with the ability to submit their claims online.

#### **REQUESTS FOR EXCLUSION AND OBJECTIONS**

9. The Notice, and Summary Notice informed potential Settlement Class Members that requests for exclusion from the Settlement Class are to be mailed to the Claims Administrator and received no later than December 26, 2023. The Notice also set forth the information that was required to be included in each request for exclusion.

10. To date, A.B. Data has received no requests for exclusion from the Settlement Class.

11. According to the Notice, Settlement Class Members wishing to object to the Settlement or any of its terms, the proposed Plan of Allocation of the Net Settlement Fund, and/or Class Counsel's application for an award of Attorneys' fees, costs, and expenses, were required to submit their objection in writing to the Court such that the papers were received on or before January 2, 2024.

12. As of the date of this affidavit, A.B. Data has not received any objections, and I am not aware of any objections being filed with the Court.

I declare under penalty of perjury under the laws of the State of Florida that the foregoing is true and correct. Executed on January 16, 2024.

Adam D. Walter  
Adam D. Walter

Sworn to and subscribed before me this 16th day of January 2024.

Amber McCalla  
Notary Public  
State of Florida, Palm Beach County

My Commission Expires: August 9, 2026

Personally Known or Produced Identification.

Type of Identification Produced: \_\_\_\_\_

