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5 **UNITED STATES DISTRICT COURT**
6 **NORTHERN DISTRICT OF CALIFORNIA**
7 **SAN FRANCISCO DIVISION**

8 BOSTON RETIREMENT SYSTEM,

9 Plaintiff,

10 vs.

11 UBER TECHNOLOGIES, INC., et al.,

12 Defendants.
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Case No.: 3:19-cv-06361-RS

**SUPPLEMENTAL DECLARATION
OF ADAM D. WALTER
REGARDING: (A) CONTINUED
DISSEMINATION OF THE
SETTLEMENT POSTCARD;
(B) UPDATE ON TELEPHONE
HELPLINE AND WEBSITE; AND
(C) CLAIMS RECEIVED TO DATE**

1 I, Adam D. Walter, declare as follows:

2 1. I am a Director of A.B. Data, Ltd. (“A.B. Data”). Pursuant to the Court’s August 9,
3 2024 Order Granting Preliminary Approval of Class Action Settlement (ECF No. 468) (the
4 “Preliminary Approval Order”), A.B. Data was authorized to act as the Claims Administrator in
5 connection with the Settlement of the above-captioned action (the “Action”).¹ I submit this
6 Declaration as a supplement to my previously filed declaration, the Declaration of Adam D. Walter
7 Regarding (A) Mailing of the Settlement Postcard and (B) Publication of the Summary Notice,
8 dated October 4, 2024 (ECF No. 477-6) (the “Initial Mailing Declaration”), in order to provide the
9 Court with updated information regarding dissemination of notice of the Settlement to potential
10 Class Members, as well as updates concerning other aspects of the Settlement administration
11 process. The following statements are based on my personal knowledge and information provided
12 by other experienced A.B. Data employees working under my supervision and, if called on to do
13 so, I could and would testify competently thereto.

14 **CONTINUED DISSEMINATION OF THE SETTLEMENT POSTCARD**

15 2. Since the date of the Initial Mailing Declaration, A.B. Data has continued to
16 disseminate copies of the Settlement Postcard in response to requests received from potential Class
17 Members, brokers and other nominees.

18 3. As more fully stated in my Initial Mailing Declaration, as of October 4, 2024, A.B.
19 Data had mailed or emailed a total of 772,957 Settlement Postcards to potential Class Members
20 and nominees.

21 4. Since the date of the Initial Mailing Declaration, and as of the date of this
22 declaration, A.B. Data has caused an additional 1,937 Settlement Postcards to be mailed in
23 response to correspondence received from potential Class Members and/or nominees.²

24 _____
25 ¹ Unless otherwise defined herein, all capitalized terms shall have the same meanings as set forth in the Stipulation
and Agreement of Settlement, dated July 19, 2024 (ECF No. 459-2) (the “Stipulation”).

26 ² In total, 689 Settlement Postcards have been returned by the U.S. Postal Service (“USPS”) as undeliverable. A.B.
27 Data has re-mailed 590 Settlement Postcards to persons whose original mailings were returned by the USPS and for
whom updated addresses were either provided to A.B. Data by the USPS or obtained by A.B. Data through a third-
28 party vendor.

5. As of the date of this declaration, A.B. data has mailed or emailed a total of 774,894 Settlement Postcards to potential Class Members.

6. As of the date of this declaration, no one has requested to opt back into the Class.

UPDATE ON TELEPHONE HELPLINE AND WEBSITE

7. As detailed in the Initial Mailing Declaration, A.B. Data established and continues to maintain a case-specific, toll-free telephone helpline to accommodate potential Class Member inquiries. This toll free-number, (877) 390-3460, became operational on July 7, 2023, in connection with the Class Notice Plan. A.B. Data has promptly responded to, and will continue to promptly respond to, all inquiries to the Uber IPO Securities Litigation telephone helpline.

8. The Initial Mailing Declaration also noted that A.B. Data updated the website created for the Action, www.UberIPOSecuritiesLitigation.com, with information regarding the Settlement. The website includes general information regarding the case and its current status, downloadable copies of the Settlement Notice, Claim Form, and other relevant court documents, including the Stipulation and Agreement of Settlement, and papers filed in support of Class Representatives' motion for final approval of the proposed Settlement, Plan of Allocation, and Class Counsel's Fee and Expense Application. The website also has online claim submission capability.

CLAIMS RECEIVED TO DATE

9. The notices and website informed potential Settlement Class Members that, if they wished to recover from the Settlement, they must submit a Claim Form to A.B. Data by November 20, 2024.

10. As of November 26, 2024, A.B. Data has received 1,186,737 claims. Of the claims received, 1,178,973 claims were filed by institutional filers, 710 claims were submitted by mail, and 7,054 claims were submitted online through the website's claim filing portal.

11. This is a very substantial number of claims. However, as in most securities cases involving claims asserted under Section 11 of the Securities Act of 1933, A.B. Data anticipates that a number of the claims submitted do not include eligible purchases pursuant and/or traceable

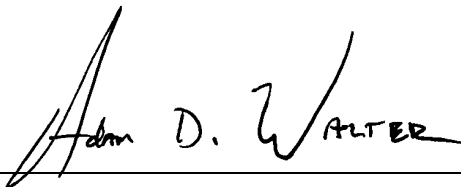
1 to the Offering Documents during the relevant period. Based on A.B. Data's experience, we expect
2 a number of claims to be ineligible due to the Claimant not having purchased Uber's publicly
3 traded common stock during the Traceability Period from May 10, 2019 through November 5,
4 2019.

5 12. Claim processing has just begun. A.B. Data has received claims that are deficient
6 or ineligible for one or more reasons and, therefore, are subject to additional processing,
7 correspondence, and telephonic communications. For claims that are incomplete or have one or
8 more defects or conditions of ineligibility, A.B. Data will contact the Claimants by sending a
9 deficiency notice to describe the defect(s) or condition(s) of ineligibility in the claim and what is
10 needed to cure any "curable" defect(s) in the claim. Claimants will have a period of time to respond
11 to the deficiency notices and to dispute A.B. Data's determination of their claim. A.B. Data will
12 assist Claimants in order to ensure that as many claims as possible can be cured. A.B. Data will
13 also perform various targeted reviews of claims, quality assurance reviews, questionable filer
14 reviews, and audits before finalizing its claim determinations.

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 November 27, 2024.

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Adam D. Walter