

# EXHIBIT 2

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2 UNITED STATES DISTRICT COURT  
3 NORTHERN DISTRICT OF CALIFORNIA  
4 SAN FRANCISCO DIVISION

5 PLUMBERS & PIPEFITTERS LOCAL ) Case No. 3:22-cv-03023-TLT (Securities Case)  
6 UNION #295 PENSION FUND, Individually )  
7 and on Behalf of All Others Similarly Situated, ) CLASS ACTION  
8 )  
9 Plaintiff, ) **DECLARATION OF KATHLEEN BRAUNS**  
10 vs. ) **IN SUPPORT OF PLAINTIFFS' INTERIM**  
11 CAREDX, INC., et al., ) **POST-DISTRIBUTION ACCOUNTING**  
12 )  
13 Defendants. )  
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1 I, Kathleen Brauns, declare as follows:

2 1. I am a Project Manager of the Class Action Administration Division of A.B. Data,  
3 Ltd. (“A.B. Data”), whose corporate office is located in Milwaukee, Wisconsin. I am over 21 years  
4 of age and am not a party to the Action.<sup>1</sup> The following statements are based on my personal  
5 knowledge and information provided to me by A.B. Data employees working under my  
6 supervision, and if called on to do so, I could and would testify competently thereto.

7 2. On May 20, 2026, A.B. Data conducted the initial distribution of the Net Settlement  
8 Fund, in accordance with the Plan of Allocation approved by the Court’s December 4, 2025 Order  
9 Granting Motion for Fairness and Final Approval of Settlement; Motion for Attorneys’ Fees and  
10 Expenses (ECF 198) (the “Final Approval Order”). The initial distribution included sending  
11 \$14,884,853.19 by check or wire transfer to 7,968 Authorized Claimants whose Claims were  
12 approved for payment. A.B. Data encountered no problems or unexpected issues in conducting the  
13 distribution.

14 3. The checks mailed to eligible Claimants indicated that they must be cashed within  
15 90 days of issue. Accordingly, the checks mailed on May 20, 2026, contained a “stale date” of  
16 August 18, 2026.

17 4. I have reviewed the Post-Distribution Accounting prepared by Lead Counsel and  
18 can confirm that the information provided therein relating to mailing of notices, processing of  
19 Claims, the distribution of settlement funds, and notice and administrative costs incurred by A.B.  
20 Data is accurate based on A.B. Data’s current records.

21 5. The average and median payment per eligible Claimant and the largest and smallest  
22 payments reported in the Post-Distribution Accounting are based on Claimants’ recoveries in the  
23 initial distribution. Authorized Claimants may receive additional funds in any subsequent  
24 distributions, if the amount of uncashed checks is sufficient to make a second distribution cost  
25 effective. In calculating the average and median payment to eligible Claimants, claims that were  
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28 <sup>1</sup> Unless otherwise noted, all capitalized terms not defined herein shall have the same definitions as  
in the Stipulation of Settlement (“Stipulation”) filed on May 23, 2025 (ECF 177-2).

1 not eligible for a payment because they fell below the \$10 minimum threshold, as provided in the  
2 Court-approved Plan of Allocation, were excluded from the analysis.

3 6. As of June 1, 2026, \$2,219,741.58 in checks remain uncashed. Although the checks  
4 mailed in the distribution contained a stale date of August 18, 2026, A.B. Data is continuing to  
5 reach out by email and phone calls to Claimants who did not cash their distribution checks and  
6 will offer to reissue checks to Authorized Claimants who have not yet cashed their checks for as  
7 long as feasible prior to any second distribution. Accordingly, the number and value of uncashed  
8 checks are expected to decline significantly.

9 7. If the funds remaining in the Net Settlement Fund as a result of uncashed or returned  
10 checks are sufficient to make a second distribution cost effective, A.B. Data will conduct a  
11 subsequent distribution of the Net Settlement Fund after the initial distribution, in which A.B. Data  
12 will redistribute any funds remaining in the Net Settlement Fund, after deducting any Court-  
13 approved unpaid fees and expenses incurred, to Authorized Claimants who cashed their checks in  
14 the initial distribution and who would be entitled to receive at least \$10 from the second  
15 distribution. A.B. Data will continue to honor all requests to reissue checks to Authorized  
16 Claimants for as long as feasible prior to any second distribution.

17 8. As set forth in the Stipulation and Final Approval Order, once reallocations are no  
18 longer feasible, residual funds will be distributed to the *cy pres* recipient, the Council of  
19 Institutional Investors (“CII”). The parties cannot estimate whether a *cy pres* distribution will be  
20 necessary since it depends on the residual amounts available after distribution from the Net  
21 Settlement Fund are completed.

22 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
23 knowledge.

24 Executed on June 1, 2026.

25 

26 Kathleen Brauns