

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PLUMBERS & PIPEFITTERS LOCAL)	Case No. 3:22-cv-03023-TLT (Securities Case)
UNION #295 PENSION FUND, Individually)	
and on Behalf of All Others Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiff,)	SUPPLEMENTAL DECLARATION OF
)	KATHLEEN BRAUNS REGARDING:
vs.)	(A) CONTINUED MAILING OF THE
)	POSTCARD NOTICE; (B) UPDATE ON
CAREDX, INC., et al.,)	SETTLEMENT WEBSITE AND CALL
)	CENTER SERVICES;
Defendants.)	(C) REPORT ON EXCLUSIONS AND
)	OBJECTIONS; AND
)	(D) CLAIMS RECEIVED TO DATE
)	
)	DATE: December 2, 2025
)	TIME: 2:00 p.m.
)	DEPT: Courtroom 9, 19th Floor
)	JUDGE: Honorable Trina L. Thompson

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.¹ 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 July 22, 2025, the Court entered its Order Granting Motion for Preliminary
8 Approval of Class Action Settlement (the “Preliminary Approval Order,” ECF 185), which granted
9 Lead Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF
10 177); and approved the Notice (ECF 177-2, Ex. A-1), Proof of Claim and Release Form (“Claim
11 Form”) (ECF 177-2, Ex. A-2), Summary Notice (ECF 177-2, Ex. A-3), and Postcard Notice (ECF
12 177-2, Ex. A-4).

13 3. Pursuant to the Preliminary Approval Order, A.B. Data is authorized to act as the
14 Claims Administrator in connection with the Action. I submit this declaration as a supplement to
15 my previously filed declaration, the Declaration of Kathleen Brauns Regarding: (A) Mailing of the
16 Postcard Notice; (B) Publication of the Summary Notice; (C) Establishment of Settlement Website
17 and Call Center Services; and (D) Report on Exclusions and Objections, dated September 30, 2025
18 (the “Initial Mailing Declaration,” ECF 191-5).

19 **CONTINUED MAILING OF THE POSTCARD NOTICE**

20 4. As more fully stated in my Initial Mailing Declaration, as of September 30, 2025,
21 A.B. Data had disseminated a total of 31,190 Postcard and Email Notices to potential Class
22 Members, including approximately 4,899 banks, brokers, and other nominees contained in A.B.
23 Data’s proprietary database of the largest and most common banks, brokers, and other nominees
24 (the “Broker Mailing Database”), and all individuals and entities subsequently identified by those
25 banks, brokers, and nominees as potential Class Members.

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28 ¹ 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 5. Since the execution of the Initial Mailing Declaration, A.B. Data has sent an
2 additional 20 Postcard and Email Notices to potential Class Members and their nominees.
3 Therefore, as of the date of this declaration, an aggregate of 31,210 Postcard and Email Notices
4 have been mailed to potential Class Members and their nominees. Of the 31,210 Postcard Notices
5 sent, 475 were returned as undeliverable. A.B. Data has since re-mailed 256 Postcard Notices to
6 persons and entities whose original mailings were returned by the U.S. Postal Service (“USPS”),
7 and for whom updated addresses were provided to A.B. Data by the USPS or ascertained through
8 a third-party information provider.

9 **UPDATE ON SETTLEMENT WEBSITE**

10 6. A.B. Data continues to maintain the website designed and implemented for the
11 Settlement, www.CareDxSecuritiesLitigation.com (the “Settlement Website”). Following Lead
12 Counsel’s filing of their briefing in support of the Settlement on September 30, 2025, A.B. Data
13 posted to the Settlement Website copies of the papers in support of the Motion for Final Approval
14 of Class Action Settlement and Approval of Plan of Allocation and the Motion for an Award of
15 Attorneys’ Fees and Expenses and Awards to Lead Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4)

16 7. A.B. Data will continue operating, maintaining and, as appropriate, updating the
17 Settlement Website with relevant case information until the conclusion of this administration.

18 **UPDATE ON CALL CENTER SERVICES**

19 8. A.B. Data continues to maintain the case specific, toll-free telephone helpline,
20 (877) 423-0707, with an interactive voice response system and live operators to respond to
21 potential Class Members who have questions about the Action and the Settlement. A.B. Data has
22 promptly responded to each telephone inquiry and will continue to operate and maintain the toll-
23 free telephone helpline until the conclusion of the administration.

24 9. As of October 28, 2025, 22 calls had been received by the toll-free telephone
25 helpline from potential Class Members. The total length of these calls was approximately 65.7
26 minutes. I understand that all inquiries received through the toll-free telephone helpline were
27 appropriately addressed.

REPORT ON EXCLUSIONS AND OBJECTIONS

10. Pursuant to the Preliminary Approval Order, the Postcard Notice, Notice, Summary Notice, and Settlement Website informed potential Class Members that written requests for exclusion were to be sent to the Claims Administrator such that they were received no later than October 14, 2025. The Notice also set forth the information that must be included in each request for exclusion. As of the date of this declaration, A.B. Data has not received any requests for exclusion.

11. Pursuant to the Preliminary Approval Order, the Postcard Notice, Notice, Summary Notice, and Settlement Website informed Class Members wishing to object to the Settlement, the proposed Plan of Allocation, or the request for attorneys' fees and litigation expenses that they were required to submit their objection in writing such that the request was received or filed with the Court no later than October 14, 2025. Despite these instructions, Class Members sometimes send objections to the Claims Administrator instead. As of the date of this declaration, A.B. Data has not received any objections, and is not aware of any objections being filed with the Court.


CLAIMS RECEIVED TO DATE

12. Pursuant to the Preliminary Approval Order, Claims are to be submitted no later than November 12, 2025. As of the date of this declaration, A.B. Data has received a total of 1,102 Claims.² As part of the claims administration process, A.B. Data will evaluate and process all Claims submitted. Claimants will have the opportunity to address any deficiencies or request judicial review if their Claim is denied. Once all Claims have been fully processed, quality assurance reviews conducted, and final administrative determinations made, A.B. Data will disburse the *pro rata* share of the Net Settlement Fund to Authorized Claimants, as calculated under the Plan of Allocation, via mail or wire transfer.

² As is typical in securities cases of this nature, the majority of institutional investors, brokers, and nominees file claims electronically at or near the filing deadline. Accordingly, the response rate to date is consistent with our experience in other securities class action claims administrations.

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

3 Executed on October 28, 2025.

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