

EXHIBIT D

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Lead Counsel for Lead Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PLUMBERS & PIPEFITTERS LOCAL
UNION #295 PENSION FUND, Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CAREDX, INC., et al.,

Defendants.

) Case No. 3:22-cv-03023-TLT (Securities
) Case)

) CLASS ACTION

) DECLARATION OF LUKE SKELTON IN
) SUPPORT OF PLAINTIFFS' MOTION FOR
) FINAL APPROVAL OF SETTLEMENT

) DATE: December 2, 2025

) TIME: 2:00 p.m.

) DEPT: Courtroom 9, 19th Floor

) JUDGE: Honorable Trina L. Thompson

1 I, Luke Skelton, hereby declare and state as follows:

2 1. I am the Chairman of the Board of Trustees ("Chairman") for Lead Plaintiff
3 Beaumont Firemen's Relief & Retirement Fund ("Beaumont Fire"), and have overseen Beaumont
4 Fire's participation as Lead Plaintiff in this matter since February 6, 2025. As Chairman, I
5 succeeded Brian Hebert ("Mr. Hebert"), who was responsible for overseeing the litigation on behalf
6 of Beaumont Fire prior to February 6, 2025. I respectfully submit this declaration in support of final
7 approval of the \$20.25 million settlement (the "Settlement").¹

8 2. Beaumont Fire is a retirement fund that provides benefits to approximately 420 active
9 members and their beneficiaries in Texas. Beaumont Fire has approximately \$120 million in assets
10 under management.

11 3. Beaumont Fire understands that the Private Securities Litigation Reform Act of 1995
12 was intended to encourage institutional investors to direct securities class actions. Following
13 appointment as Lead Plaintiff, Beaumont Fire monitored the progress of the litigation, including
14 engagement with Lead Counsel Robbins Geller Rudman & Dowd LLP ("Robbins Geller") regarding
15 case developments, litigation strategy, and potential resolution of the Action. In fulfillment of its
16 responsibilities on behalf of all members of the Class, Beaumont Fire, with the assistance of its
17 counsel has: (i) engaged in meetings, phone conferences, and correspondence with Robbins Geller;
18 (ii) participated in the Action and provided input into the prosecution of the case; (iii) kept informed
19 regarding case status; (iv) reviewed documents filed in this Action and opinions of this Court;
20 (v) prepared written discovery responses, collected and reviewed documents for production, and
21 engaged in deposition scheduling; (vi) prepared declarations; (vii) kept informed about mediation
22 and settlement negotiations; and (viii) considered and approved the proposed Settlement.

23 4. Beaumont Fire authorized Lead Counsel to settle this Action for \$20.25 million. In
24 this regard, my colleagues and I reviewed, considered, and evaluated the merits of this case,
25 including the law governing the allegations and facts developed through Lead Counsel's
26 investigation. In making its determination that the \$20.25 million Settlement Amount represented a

27 ¹ All capitalized terms used in this Declaration that are not otherwise defined herein have the
28 same meaning as set forth in the Stipulation of Settlement (ECF 177-2) (the "Stipulation").

1 fair, reasonable, and adequate amount for the Class, Beaumont Fire weighed the substantial benefits
2 to the Class against the significant risks and uncertainties of continued litigation. After doing so,
3 Beaumont Fire believes the \$20.25 million recovery represents an exceptional result for the Class
4 and that approval of the Settlement is in the best interest of the Class.

5 5. While I recognize that any determination of attorneys' fees is left to the Court,
6 Beaumont Fire believes the fee application for 25% of the Settlement Amount and expenses in an
7 amount not to exceed \$450,000, plus interest earned on both amounts, is fair, reasonable, and
8 appropriate given the facts and circumstances of this case, the tremendous result achieved, and Lead
9 Counsel's high quality representation and its diligence in prosecuting this Action.

10 6. Mr. Hebert, Joni Hanley, the Fund Administrator, and I devoted many hours to the
11 prosecution of this Action on behalf of the Class, which otherwise would have been spent on the
12 daily business activities of Beaumont Fire. Combined, we spent approximately 20 hours on this
13 Action. Based upon our overall levels of compensation and benefits, I believe a reasonable and
14 appropriate hourly rate for our time is \$175. Accordingly, Beaumont Fire respectfully requests an
15 award in the amount of \$3,500 for its time expended in the prosecution of the litigation on behalf of
16 the Class.

17 7. Beaumont Fire also respectfully requests that the Court approve the \$20.25 million
18 Settlement as well as Lead Counsel's application for an award of attorneys' fees and expenses.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct. Executed on September 17, 2025, at Beaumont, Texas.

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23 LUKE SKELTON
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