

EXHIBIT B

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

CLASS ACTION

DECLARATION OF TOM KLINGENBERG
FILED ON BEHALF OF SHEET METAL
WORKERS LOCAL 19 PENSION FUND IN
SUPPORT OF (I) LEAD PLAINTIFFS'
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND APPROVAL OF PLAN
OF ALLOCATION; AND (II) LEAD
COUNSEL'S MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND EXPENSES
AND AWARD TO LEAD PLAINTIFFS
PURSUANT TO 15 U.S.C. §78U-4(A)(4)

DATE: December 2, 2025

TIME: 2:00 p.m.

DEPT: Courtroom 9, 19th Floor

JUDGE: Honorable Trina L. Thompson

1 I, Tom Klingenberg, hereby declare as follows:

2 1. I am the Administrator of Lead Plaintiff Sheet Metal Workers Local 19 Pension
3 Fund (“Local 19” or the “Fund”).¹ I respectfully submit this Declaration on behalf of Local 19 in
4 support of Lead Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement and
5 Approval of Plan of Allocation and Lead Counsel’s Motion for an Award of Attorneys’ Fees and
6 Expenses and Award to Lead Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4).

7 2. Local 19 provides retirement benefits to approximately 4,000 active and retired
8 employees in Pennsylvania, New Jersey, and Delaware. As of July 2022, Local 19 had
9 approximately \$500 million in assets under management. Local 19 purchased CareDx common
10 stock during the Class Period and suffered substantial losses as a result.

11 3. The Fund understands that the Private Securities Litigation Reform Act of 1995
12 was intended to encourage institutional investors to direct securities class actions. Prior to and
13 following appointment as Lead Plaintiff, the Fund has monitored the progress of the litigation,
14 including engagement with Lead Counsel Saxena White P.A. (“Saxena White”) regarding case
15 developments, litigation strategy, and potential resolution of the Action. In fulfillment of its
16 responsibilities on behalf of all members of the Class, the Fund has: (i) engaged in meetings and
17 correspondence with Lead Counsel; (ii) participated in the Action and provided input into the
18 prosecution of the case; (iii) kept informed regarding case status; (iv) reviewed documents filed in
19 this Action and opinions of the Court; (v) kept informed about mediation and settlement
20 negotiations; and (vi) considered and approved the proposed Settlement.

21 4. The Fund believes the Settlement is an excellent result and its approval is in the
22 best interest of the Class. In making its determination that the \$20,250,000 Settlement represents
23 a fair, reasonable, and adequate amount for the Class, the Fund evaluated the significant risks and
24 uncertainties of continuing litigation, including the possibility of a nominal recovery or even no
25 recovery, and weighed those risks against the substantial benefits of the Settlement to the Class.
26 In light of those factors, the Fund believes the Settlement is fair and reasonable and urges the Court

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28 ¹ All capitalized terms used herein, unless otherwise defined, have the same meanings as set forth
in the Stipulation of Settlement (ECF No. 177-2).

1 to approve the Settlement.

2 5. While the Fund understands that any determination of attorneys' fees is left to the
3 Court, the Fund supports Lead Counsel's application for 25% of the Settlement Fund. A 25%
4 award is particularly appropriate here because of the highly complex issues involved, Lead
5 Counsel's tremendous investment of time and resources, the outstanding result achieved, the
6 approval of the Class, and the significant risks in the litigation. The Fund believes the request is
7 fair, reasonable, and appropriate as this Settlement would not have been possible without the
8 diligent efforts of Lead Counsel, who vigorously litigated this case.

9 6. The Fund further believes that the litigation expenses being requested for payment
10 to Lead Counsel are reasonable and represent costs and expenses necessary for the prosecution
11 and resolution of the claims in the Action. Based on the foregoing, Local 19 fully supports the
12 request for attorneys' fees and expenses.

13 7. Throughout the prosecution of the Action, Local 19 was represented and supported
14 by myself and other Fund representatives. The time that other staff members of Local 19 and I
15 devoted to pursuing the Class's interests in this Action was time we otherwise would have devoted
16 to other work for the Fund and thus represents a direct cost to Local 19. In total, Local 19's
17 representatives and I devoted approximately 74 hours in support of Local 19's efforts in
18 furtherance of the prosecution of this Action and to achieve this recovery on behalf of CareDx
19 shareholders during the Class Period.² Applying my hourly billing rate of \$153.90, the Fund
20 incurred costs of \$11,388.60. As noted in the preliminary approval settlement papers, Lead
21 Plaintiffs intend to request an amount not to exceed \$7,500 each, pursuant to 15 U.S.C. §78u-
22 4(a)(4). Accordingly, Local 19 respectfully requests \$7,500 for reimbursement.³

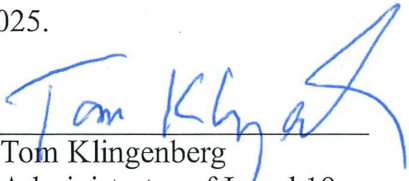
23 8. In light of the foregoing, the Fund respectfully requests that the Court approve the
24 \$20,250,000 Settlement as well as Lead Counsel's application for an award of attorneys' fees and

26 ² While Local 19 devoted a significant amount of time to this Action, the Fund's request for
27 reimbursement of costs is based on a very conservative estimate of the amount of time spent on
this litigation, as supported by the Fund's and Lead Counsel's records.

28 ³ The hourly rate used for purposes of this request are based on my annual salary.

1 expenses, and award the Fund \$7,500 pursuant to 15 U.S.C. § 78u-4(a)(4) for its costs in
2 connection with the prosecution of this Action.

3 I declare, under penalty of perjury, that the foregoing is true and correct to the best of my
4 knowledge. Executed this 29th day of September, 2025.

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Tom Klingenberg
Administrator of Local 19
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