

1 ROBBINS GELLER RUDMAN
 & DOWD LLP
 2 SHAWN A. WILLIAMS (213113)
 Post Montgomery Center
 3 One Montgomery Street, Suite 1800
 San Francisco, CA 94104
 4 Telephone: 415/288-4545
 415/288-4534 (fax)
 5 shawnw@rgrdlaw.com
 – and –
 6 SPENCER A. BURKHOLZ (147029)
 THEODORE J. PINTAR (131372)
 7 LAURIE L. LARGENT (153493)
 LAURA ANDRACCHIO (187773)
 8 SCOTT H. SAHAM (188355)
 ASHLEY M. KELLY (281597)
 9 TING H. LIU (307747)
 STEPHEN JOHNSON (347822)
 10 655 West Broadway, Suite 1900
 San Diego, CA 92101
 11 Telephone: 619/231-1058
 619/231-7423 (fax)
 12 spenceb@rgrdlaw.com
 tedp@rgrdlaw.com
 13 llargent@rgrdlaw.com
 landracchio@rgrdlaw.com
 14 scott@s@rgrdlaw.com
 ashleyk@rgrdlaw.com
 15 tliu@rgrdlaw.com
 sjohnson@rgrdlaw.com

16 Lead Counsel for Lead Plaintiff

17 UNITED STATES DISTRICT COURT
 18
 19 NORTHERN DISTRICT OF CALIFORNIA

20 WILLIAM LAMARTINA, Individually and on)
 Behalf of All Others Similarly Situated,)
 21 Plaintiff,)
 22 vs.)
 23 VMWARE, INC., et al.,)
 24 Defendants.)

Case No. 5:20-cv-02182-EJD (VKD)
CLASS ACTION
 SUPPLEMENTAL DECLARATION OF
 ROSS D. MURRAY REGARDING
 CONTINUED NOTICE DISSEMINATION,
 CLAIMS RECEIVED, AND REQUESTS
 FOR EXCLUSION RECEIVED

DATE: March 31, 2025
 TIME: 9:00 a.m.
 JUDGE: Honorable Edward J. Davila
 CTRM: 4, 5th Floor

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1 I, ROSS D. MURRAY, declare and state as follows:

2 1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”),
3 located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s
4 November 26, 2024 Order Preliminarily Approving Settlement and Providing for Notice (“Notice
5 Order”) (ECF 188), Gilardi was appointed as the Claims Administrator in connection with the
6 proposed Settlement of the above-captioned action (the “Action”).¹ I oversaw the notice services
7 that Gilardi provided in accordance with the Notice Order.

8 2. I submit this declaration as a supplement to my previously filed declaration, the
9 Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for
10 Exclusion Received to Date (ECF 193-2) (the “Initial Mailing Declaration”). The following
11 statements are based on my personal knowledge and information provided to me by other Gilardi
12 employees, and, if called as a witness, I could and would testify competently thereto.

13 **CONTINUED DISSEMINATION OF NOTICE**

14 3. As more fully detailed in the Initial Mailing Declaration, as of February 20, 2025,
15 Gilardi had mailed or emailed a total of 137,925 Postcard Notices and 49 copies of the Notice of
16 Pendency and Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release
17 form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and
18 their nominees. In addition, one institution reported that they anticipated sending Postcard Notices
19 via email to 65,801 potential Class Members. *See* Initial Mailing Declaration, ¶13.

20 4. Since February 20, 2025, Gilardi has mailed or emailed an additional 191 Postcard
21 Notices and two Claim Packages in response to requests from potential Class Members, brokers,
22 and nominees and as a result of mail returned as undeliverable for which new addresses were

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25 ¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed
26 to them in the Stipulation of Settlement dated October 4, 2024 (the “Stipulation”) (ECF 181-2),
27 which is available on the website established for the Settlement at
28 www.VMwareSecuritiesLitigation.com.

1 identified and re-mailed to those new addresses.² Therefore, as of March 21, 2025, Gilardi has
2 mailed or emailed a total of 138,116 Postcard Notices and 51 Claim Packages to potential Class
3 Members and nominees. Additionally, Gilardi received a message from one institution noting that
4 they anticipated sending Postcard Notices via email to 65,801 potential Class Members.

5 **CLAIMS RECEIVED**

6 5. Pursuant to the Notice Order, the Notice informed potential Class Members that all
7 Claim Forms must be received or submitted online no later than March 17, 2025. As of the date
8 of this declaration, Gilardi has received 184,909 Claim Forms.

9 **UPDATE ON CALL CENTER SERVICES AND WEBSITE**

10 6. Gilardi continues to maintain the toll-free telephone number (1-888-298-5840) to
11 accommodate inquiries about the Settlement from potential Class Members. Gilardi also monitors
12 the case-dedicated e-mail address, info@VMwareSecuritiesLitigation.com. Gilardi endeavors to
13 respond timely to each telephone and e-mail inquiry and will continue to respond to Class Member
14 inquiries via the toll-free telephone number and case dedicated e-mail address until the conclusion
15 of the administration.

16 7. Gilardi also continues to maintain the website dedicated to the Settlement,
17 www.VMwareSecuritiesLitigation.com (the "Settlement Website"), to assist potential Class
18 Members. Following Lead Counsel's filing of its briefing in support of the Settlement on February
19 24, 2025, Gilardi posted to the Settlement Website copies of the papers in support of Lead
20 Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of
21 Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Award
22 to Class Representative Pursuant to 15 U.S.C §78u-4(a)(4). Gilardi will continue operating,
23 maintaining and, as appropriate, updating the Settlement Website until the conclusion of the
24 administration of this Settlement.

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27 ² To date, of the 138,116 mailed Postcard Notices, 1,395 were undeliverable. Updated addresses
28 were located, and an additional 247 Postcard Notices were mailed.

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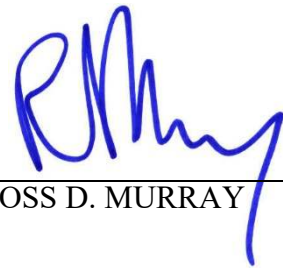
REQUESTS FOR EXCLUSION RECEIVED

8. Pursuant to the Notice Order, the Notice informed potential Class Members that written requests for exclusion from the Class were to be mailed to *VMware Securities Litigation*, c/o Gilardi & Co. LLC, Claims Administrator, EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100, such that they are received no later than March 10, 2025. At the time of the Initial Mailing Declaration, Gilardi reported that it had received one request for exclusion. See Initial Mailing Declaration, ¶18 and Ex. E thereto.

9. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has not received any further requests for exclusion.

10. The Notice requests that objections must be filed with the Court such that they are filed or received on or before March 10, 2025. While Gilardi was not listed as a recipient of objections, Gilardi has not received any misdirected objections.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 21st day of March, 2025, at San Rafael, California.



ROSS D. MURRAY