

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE NOVO NORDISK  
SECURITIES LITIGATION

No. 3:17-cv-209-ZNQ-LHG

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA REGARDING  
MAILING OF THE SETTLEMENT NOTICE AND CLAIM FORM**

I, Luiggy Segura, hereby declare under penalty of perjury as follows:

1. I am the Vice President of Securities Class Actions at JND Legal Administration (“JND”). Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice, dated March 8, 2022 (ECF 344) (the “Preliminary Approval Order”), Lead Counsel was authorized to retain JND as the Claims Administrator in the above-captioned action (the “Action”).<sup>1</sup> I submit this Declaration as a supplement to my earlier declaration, the Declaration of Luiggy Segura Regarding: (A) Mailing of the Settlement Notice and Claim Form; and (B) Publication of the Summary Settlement Notice, dated May 20, 2022 (ECF 350-9) (the “Initial Mailing Declaration”). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts stated in this Declaration and, if called as a witness, could and would testify competently thereto.

**CONTINUED MAILING OF THE SETTLEMENT NOTICE PACKET**

2. Since the execution of my Initial Mailing Declaration, JND has continued to disseminate copies of the Settlement Notice and Claim Form (together, the “Settlement Notice Packet”) in response to additional requests from potential Class Members and nominees. As of

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<sup>1</sup> All capitalized terms used in this Declaration that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated November 23, 2021 (ECF 311-3).

June 15, 2022, JND has mailed a total of 378,728 Settlement Notice Packets to potential Class Members and nominees.

### **TELEPHONE HELPLINE AND WEBSITE**

3. JND continues to maintain the toll-free telephone helpline, 1-833-674-0167, and interactive voice response system to accommodate inquiries from Class Members. JND also continues to maintain the dedicated website for the Action, [www.NovoNordiskSecuritiesLitigation.com](http://www.NovoNordiskSecuritiesLitigation.com), to assist potential Class Members. On May 24, 2022, JND posted to the case website copies of the papers filed in support of Lead Plaintiffs' Motion for Final Approval of Settlement and Approval of Plan of Allocation and Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses, and Awards to Lead Plaintiffs. On May 20, 2022, JND updated the case website to reflect the Court's May 20, 2022 Order continuing the Fairness Hearing from June 27, 2022 to June 28, 2022. JND will continue to maintain and, as appropriate, update the case website and toll-free telephone helpline until the conclusion of this administration.

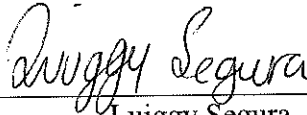
### **MINIMUM DISTRIBUTION THRESHOLDS**

4. In certain class action matters, particularly securities litigation, minimum check amounts of \$10.00 are commonly used. The use of minimum check amounts is intended to address the potentially disproportionate administrative expense to settlement funds associated with issuing very small checks to investors. Every check that is issued in a case like this one represents an expense that is borne by the settlement fund, and therefore ultimately by class members. Besides the cost to print and mail a check, the administrator must also track and account for each payment as it is negotiated, or, as is frequently the case with very small payments, not negotiated. At JND, we routinely follow up on uncashed checks by mail, email, and telephone, all of which creates

administrative expenses. In our experience, very small checks, i.e., those under \$10.00, are often not cashed initially, and in many cases are never cashed. Moreover, because many small checks are not cashed during their initial valid period, they occasionally need to be, and are subsequently reissued, at the request of the recipient. All of these costs add to the expense of the administration, which reduces the amount available for distribution to class members.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2022.

  
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Luiggy Segura