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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: SANDISK LLC SECURITIES ) Case No. 3:15-cv-01455-VC  
LITIGATION )  
 ) Hon. Vince Chhabria  
 )  
 )  
 ) **[PROPOSED] ORDER APPROVING**  
 ) **SETTLEMENT DISTRIBUTION TO**  
 ) **AUTHORIZED CLAIMANTS AND**  
 ) **GRANTING RELATED RELIEF**  
 )  
 )

THIS MATTER having come before the Court on the motion of Class Representatives City of Bristol Pension Fund; City of Milford, Connecticut Pension & Retirement Board; Pavers and Road Builders Pension, Annuity and Welfare Funds; the City of Newport News Employees’ Retirement Fund; and Massachusetts Laborers’ Pension Fund (collectively, the “Class Representatives”) for approval of a distribution of the Net Settlement Fund to Authorized Claimants; the Settlement having reached its Effective Date; and the Court having considered the papers filed and proceedings had herein and otherwise being fully informed;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. This Order incorporates by reference the definitions in the Revised Stipulation and Agreement of Settlement, dated as of May 20, 2020, (ECF No. 274-1) (the “Stipulation”) and Declaration of Alexander P. Villanova in Support of Class Representatives’ Motion for Authorization to Distribute Net Settlement Fund (the “Villanova Declaration”), and all capitalized terms used, but not defined herein, shall have the same meanings as those set forth in the Stipulation and Villanova Declaration.

1           2.       The administrative recommendations of Epiq Class Action & Claims Solutions,  
2 Inc. (“Epiq” or “Claims Administrator”), the Court-appointed Claims Administrator, to accept the  
3 Proof of Claim and Release forms (“Claim Forms”), including the late, but otherwise eligible,  
4 Claim Forms listed in Exhibits D-1 and D-2 to the Villanova Declaration are hereby APPROVED.

5           3.       As determined by the Claims Administrator, wholly rejected or otherwise  
6 ineligible Proofs of Claim, listed in Exhibit D-3, are hereby REJECTED, including Disputed  
7 Claims Nos. 379, 999, and 3183.

8           4.       The distribution of the Net Settlement Fund to Authorized Claimants is hereby  
9 AUTHORIZED and shall be conducted in accordance with the Stipulation, Court-approved Plan  
10 of Allocation, and distribution plan for payment of the Net Settlement Fund set forth in the  
11 Villanova Declaration, which is hereby APPROVED.

12          5.       No Claim Forms received or adjusted, in a manner that would result in an increased  
13 Recognized Claim Amount, after May 10, 2020, will be eligible for a payment or additional  
14 payment, as the case may be.

15          6.       A payment in the amount of \$49,589.50 from the Settlement Fund for Epiq’s  
16 estimate of its fees and expenses to be incurred in connection with the initial distribution of the  
17 Net Settlement Fund is hereby AUTHORIZED. If the incurred fees and expenses for the initial  
18 distribution are lower than the estimate, the Claims Administrator shall promptly reimburse the  
19 Net Settlement Fund.

20          7.       The administration of the Settlement and the proposed distribution of the Net  
21 Settlement Fund comply with the terms of the Stipulation and Plan of Allocation.

22          8.       The Claims Administrator is authorized to destroy paper copies of the Proofs of  
23 Claim and all supporting documents one year after the final distribution of the Net Settlement  
24 Fund and to destroy electronic copies of the same one year after all funds have been distributed.

25          9.       As required by the Final Order and Judgment entered by the Court on October 23,  
26 2019, no later than 104 calendar days after the initial distribution of payments to Authorized  
27 Claimants, Class Counsel shall file a Post-Distribution Accounting providing the following  
28 information: the total amount of the Settlement Fund; the total amount of the Net Settlement Fund

1 distributed to Authorized Claimants; the total number of Class Members; the total number of  
 2 Class Members sent Settlement Notices not returned as undeliverable; the number and percentage  
 3 of Claim Forms submitted; the number and percentage of opt-outs; the number and percentage of  
 4 objections; the date on which the distribution was made; the number of Authorized Claimants  
 5 who were sent payments; the average and median recovery per Authorized Claimant; the largest  
 6 and smallest amounts paid to Authorized Claimants; the methods of notice and of payment to  
 7 Authorized Claimants; the number and value of payments negotiated; the number and value of  
 8 payments not negotiated; the amounts distributed to each *cy pres* recipient, if any; the total amount  
 9 of Notice and Administration Expenses; the total amount of attorneys’ fee and expenses; awarded  
 10 attorneys’ fees as a percentage of the Settlement Fund; and the lodestar multiplier. The Post-  
 11 Distribution Accounting shall also be posted on the website for the Action.

12 IT IS SO ORDERED.

13 DATED: June 15, 2020.



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16 HONORABLE VINCE CHHABRIA  
UNITED STATES DISTRICT JUDGE

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