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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 MARILYN EZZES, Individually and on
Behalf of All Others Similarly Situated,

19 Plaintiff,

20 v.

21 VINTAGE WINE ESTATES, INC.,
22 PATRICK RONEY, KATHERINE
23 DEVILLERS, and KRISTINA JOHNSTON,

24 Defendants.

Case No. 2:22-cv-01915-GMN-DJA

**REPLY MEMORANDUM IN FURTHER
SUPPORT OF: (1) PLAINTIFFS'
UNOPPOSED MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF
ALLOCATION; AND (2) LEAD
COUNSEL'S MOTION FOR AN AWARD
OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION
EXPENSES**

Hearing Date: September 22, 2026

Time: 10:00 a.m.

Location: Courtroom 7-D

Judge: Hon. Gloria M. Navarro

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	ARGUMENT	3
A.	The Positive Reaction of the Settlement Class Supports Approval of the Settlement and Plan of Allocation.....	3
B.	The Settlement Class’s Reaction Supports Approval of the Plan of Allocation.....	4
C.	The Settlement Class’s Reaction Supports Approval of the Fee and Expense Application.....	5
III.	CONCLUSION	6

TABLE OF AUTHORITIES

CASES

<i>Ali v. Franklin Wireless Corp.</i> , 2024 WL 5179910 (S.D. Cal. Dec. 19, 2024)	4
<i>Cheng Jiangchen v. Rentech, Inc.</i> , 2019 WL 5173771 (C.D. Cal. Oct. 10, 2019)	4
<i>Ching v. Siemens Indus., Inc.</i> , 2014 WL 2926210 (N.D. Cal. June 27, 2014)	3
<i>Citigroup Inc. Bond Litig.</i> , 296 F.R.D. 147 (S.D.N.Y. 2013).....	4
<i>Cortez v. Vieira Custom Chopping, Inc.</i> , 2020 WL 4369101 (E.D. Cal. July 20, 2020)	3
<i>Hanlon v. Chrysler Corp.</i> , 150 F.3d 1011 (9th Cir. 1998).....	3
<i>In re Apollo Grp. Inc. Sec. Litig.</i> , 2012 WL 1378677 (D. Ariz. Apr. 20, 2012).....	3
<i>In re Banc of California Sec. Litig.</i> , 2020 WL 1283486 (C.D. Cal. Mar. 16, 2020)	5
<i>In re ECOtality, Inc. Sec. Litig.</i> , 2015 WL 5117618 (N.D. Cal. Aug. 28, 2015).....	2
<i>In re Extreme Networks, Inc. Sec. Litig.</i> , 2019 WL 3290770 (N.D. Cal. July 22, 2019).....	4
<i>In re Heritage Bond Litig.</i> , 2005 WL 1594403 (C.D. Cal. June 10, 2005).....	4
<i>In re Immune Response Sec. Litig.</i> , 497 F. Supp. 2d 1166 (S.D. Cal. 2007)	5
<i>In re Omnivision Techs., Inc.</i> , 559 F. Supp. 2d 1036 (N.D. Cal. 2008)	3, 5
<i>In re Signet Jewelers Ltd. Sec. Litig.</i> , 2020 WL 4196468 (S.D.N.Y. July 21, 2020)	2
<i>In re Stable Road Acquisition Corp. Sec. Litig.</i> , 2024 WL 3643393 (C.D. Cal. Apr. 23, 2024).....	5

1	<i>In re Volkswagen “Clean Diesel” Mktg., Sales Practices, & Prod. Liab. Litig.,</i>	
2	2019 WL 2077847 (N.D. Cal. May 10, 2019)	5
3	<i>Kendall v. Odonate Therapeutics, Inc.,</i>	
4	2022 WL 1997530 (S.D. Cal. June 6, 2022)	6
5	<i>Khoja v. Orexigen Therapeutics, Inc.,</i>	
6	2021 WL 5632673 (S.D. Cal. Nov. 30, 2021)	3
7	<i>Linney v. Cellular Alaska P’ship,</i>	
8	151 F.3d 1234 (9th Cir. 1998)	3
9	<i>Maine State Ret. Sys. v. Countrywide Fin. Corp.,</i>	
10	2013 WL 6577020 (C.D. Cal. Dec. 5, 2013)	3
11	<i>Mauss v. NuVasive, Inc.,</i>	
12	2018 WL 6421623 (S.D. Cal. Dec. 6, 2018)	5
13	<i>Nat’l Rural Telecomms. Coop. v. DIRECTV, Inc.,</i>	
14	221 F.R.D. 523 (C.D. Cal. 2004)	3
15	<i>Patel v. Axesstel, Inc.,</i>	
16	2015 WL 6458073 (S.D. Cal. Oct. 23, 2015)	6
17	<i>Ressler v. Jacobson,</i>	
18	149 F.R.D. 651 (M.D. Fla. Dec. 15, 1992)	2
19	<i>Waldbuesser v. Northrop Grumman Corp.,</i>	
20	2017 WL 9614818 (C.D. Cal. Oct. 24, 2017)	5
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1 Court-appointed lead plaintiffs Marilyn Ezzes and Jeffrey A. Davies and additional named
 2 plaintiff Michael F. Salbenblatt (collectively, “Plaintiffs”), and lead counsel, Glancy Prongay Wolke
 3 & Rotter LLP (“Lead Counsel”), respectfully submit this memorandum in further support of: (i)
 4 Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation
 5 (ECF No. 123); and (ii) Lead Counsel’s Motion for an Award of Attorneys’ Fees and
 6 Reimbursement of Litigation Expenses (ECF No. 124; the “Fee and Expense Application”).¹

7 **I. INTRODUCTION**

8 Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice
 9 (“Preliminary Approval Order,” ECF No. 122), 14,141 copies of the Court-approved Postcard
 10 Notice, Notice Packet (consisting of the Notice and Claim Form), or links to the Notice Packet, were
 11 disseminated to potential Settlement Class Members and the largest brokerage firms, banks,
 12 institutions, and other nominees.² In addition, the Court-appointed Claims Administrator, Strategic
 13 Claims Services (“SCS”): caused (i) the Summary Notice to be published in *Investor’s Business*
 14 *Daily* and transmitted over *PR Newswire* on June 22, 2026,³ and (ii) the Notice, Claim Form,
 15 Postcard Notice, Stipulation with exhibits, and Preliminary Approval Order, among other important
 16 case-related documents, to be posted on the Settlement Website
 17 (www.VintageWineSecuritiesSettlement.com). *See* Initial Mailing Decl. ¶12. The Postcard Notice,
 18 Notice, Summary Notice, and Settlement Website informed Settlement Class Members of the
 19 September 1, 2026, deadline to: (i) submit an objection to the Settlement, Plan of Allocation, and/or

22 ¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in
 23 the Stipulation and Agreement of Settlement dated April 24, 2026 (the “Stipulation”; ECF No. 119-
 24 2), or the Declaration of Casey E. Sadler in Support of (I) Plaintiffs’ Unopposed Motion for Final
 Approval of Class Action Settlement and Plan of Allocation, and (II) Lead Counsel’s Motion for an
 Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (ECF No. 125).

25 ² *See* Supplemental Declaration of Josephine Bravata Concerning: (A) Mailing/Emailing of Notice;
 26 (B) Report on Requests for Exclusion and Objections; and (C) Claims Received to Date (the “Suppl.
 Mailing Decl.”) (attached as Exhibit 1 hereto) ¶¶2-4.

27 ³ *See* ECF No. 125-6 (Declaration of Josephine Bravata Concerning: (A) Mailing/ Emailing of Notice;
 28 (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections
 (“Initial Mailing Decl.”)), ¶10 & Ex. E.

1 Fee and Expense Application; or (ii) request exclusion from the Settlement Class. *See id.* ¶¶16-17,
2 & Exs. A, C and D.

3 On August 18, 2026, Plaintiffs and Lead Counsel filed their opening papers in support of
4 final approval of the Settlement, Plan of Allocation, and request for attorneys' fees and
5 reimbursement of Litigation Expenses. The motions are supported by the declarations of Lead
6 Plaintiffs, Lead Counsel, and the Claims Administrator. These papers are available on the public
7 docket and on the Settlement Website. *See* ECF Nos. 123-125; Suppl. Mailing Decl. ¶7.

8 Following this extensive notice process, ***not one*** Settlement Class Member has: (i) objected
9 to the Settlement, the Plan of Allocation, or Lead Counsel's Fee and Expense Application; or (ii)
10 requested exclusion from the Settlement Class. *See* Suppl. Mailing Decl. ¶¶10-11. The absence of
11 any objections and opt-outs by Settlement Class Members provides strong evidence of the fairness
12 and reasonableness of the proposed Settlement, Plan of Allocation, and request for attorneys' fees
13 and reimbursement of Litigation Expenses. *See In re Signet Jewelers Ltd. Sec. Litig.*, 2020 WL
14 4196468, at *6 (S.D.N.Y. July 21, 2020) ("The absence of any objections and the small number of
15 requests for exclusion support a finding that the Settlement is fair, reasonable, and adequate."); *id.*
16 at *21 ("The absence of any objections to the requested attorneys' fees and Litigation Expenses
17 supports a finding that the request is fair and reasonable."); *Ressler v. Jacobson*, 149 F.R.D. 651,
18 656 (M.D. Fla. Dec. 15, 1992) ("The fact that there are no objections to either the Settlement or to
19 Petitioners' request for attorney's fees is strong evidence of the propriety and acceptability of that
20 request."); *In re ECOTality, Inc. Sec. Litig.*, 2015 WL 5117618, at *3 (N.D. Cal. Aug. 28, 2015)
21 ("After receiving notice of the proposed settlement, class members in this suit have been silent. As
22 a result, this factor weighs heavily in favor of approval.").⁴

23 For all the reasons set forth herein, and in the opening papers filed with the Court on August
24 18, 2026, Plaintiffs and Lead Counsel respectfully request that the Court approve the Settlement,
25 Plan of Allocation, and request for attorneys' fees and reimbursement of Litigation Expenses.

28 ⁴ Unless otherwise indicated, all internal quotations and citations are omitted.

II. ARGUMENT

A. The Positive Reaction of the Settlement Class Supports Approval of the Settlement and Plan of Allocation

In this Circuit, “the reaction of the class members to the proposed settlement” is one of the factors to consider in analyzing whether a settlement is fair, reasonable, and adequate. *See, e.g., Linney v. Cellular Alaska P’ship*, 151 F.3d 1234, 1242 (9th Cir. 1998); *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1026 (9th Cir. 1998) (same). “[T]he absence of a large number of objections to a proposed class action settlement raises a strong presumption that the terms of a proposed class settlement action are favorable to the class members.” *Nat’l Rural Telecomms. Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 529 (C.D. Cal. 2004); *see also Ching v. Siemens Indus., Inc.*, 2014 WL 2926210, at *6 (N.D. Cal. June 27, 2014) (“the Court may appropriately infer that a class action settlement is fair, adequate, and reasonable when few class members object to it.”).

Here, the lack of a single objection to, or request for exclusion from, the Settlement demonstrates that the proposed Settlement is fundamentally fair, reasonable, and adequate. *See, e.g., In re Apollo Grp. Inc. Sec. Litig.*, 2012 WL 1378677, at *3 (D. Ariz. Apr. 20, 2012) (“There have been no objections from Class Members or potential class members, which itself is compelling evidence that the Proposed Settlement is fair, just, reasonable, and adequate.”); *In re Omnivision Techs., Inc.*, 559 F. Supp. 2d 1036, 1043 (N.D. Cal. 2008) (“By any standard, the lack of objection of the Class Members favors approval of the Settlement.”); *Khoja v. Orexigen Therapeutics, Inc.*, 2021 WL 5632673, at *7 (S.D. Cal. Nov. 30, 2021) (“Considering the number of Notice Packets mailed to potential Class Members and the fact that zero objections have been filed, the Court finds that the reaction of the Class Members to the Settlement weighs in favor of approving the Settlement.”).⁵

⁵ *See also Chrysler Corp.*, 150 F.3d at 1027 (that the “overwhelming majority” stayed in the class is “objective positive commentary as to its fairness”); *Cortez v. Vieira Custom Chopping, Inc.*, 2020 WL 4369101, at *6 (E.D. Cal. July 20, 2020) (“The lack of objections or class members opting out of the settlement suggests general approval of the settlement by the class.”); *Maine State Ret. Sys. v. Countrywide Fin. Corp.*, 2013 WL 6577020, at *16 (C.D. Cal. Dec. 5, 2013) (69 exclusion requests in response to mailing of over 50,000 notices supports settlement).

Moreover, the fact that no institutional investors or other large shareholders have objected to the proposed Settlement further underscores its reasonableness. *See, e.g., In re Extreme Networks, Inc. Sec. Litig.*, 2019 WL 3290770, at *9 (N.D. Cal. July 22, 2019) (“Many potential class members are sophisticated institutional investors; the lack of objections from such institutions indicates that the settlement is fair and reasonable.”); *Citigroup Inc. Bond Litig.*, 296 F.R.D. 147, 156 (S.D.N.Y. 2013) (finding “class’s reaction weighs heavily in favor of approval” where “not one of the objections or requests for exclusion was submitted by an institutional investor.”).

Settlement Class Members’ affirmative participation in the Settlement by submitting claims also indicates a positive reaction to the Settlement. The claims filing deadline is not until October 9, 2026, but as of September 14, 2026, 280 claims have already been submitted by potential Settlement Class Members seeking to participate in the Settlement. Supp. Mailing Decl. ¶14. In SCS’ experience “the vast majority of claims in this Action will be filed at or near the deadline.” *Id.* at ¶13. This is because most institutional investors, brokers, and other nominees typically file Claims electronically at or near the claims filing deadline.⁶

Given these circumstances, there can be no question that the reaction of the Settlement Class favors final approval. *See Cheng Jiangchen v. Rentech, Inc.*, 2019 WL 5173771, at *7 (C.D. Cal. Oct. 10, 2019) (“The absence of any objections to the Settlement Agreement among Class Members supports final approval.”); *Ali v. Franklin Wireless Corp.*, 2024 WL 5179910, at *8 (S.D. Cal. Dec. 19, 2024) (“Here, no objections to the Settlement by class members have been received and no class members have opted out. The absence of opt outs and objections weighs in favor of settlement.”).

B. The Settlement Class’s Reaction Supports Approval of the Plan of Allocation

The favorable reaction of the Settlement Class also supports approval of the Plan of Allocation. *See In re Heritage Bond Litig.*, 2005 WL 1594403, at *12 (C.D. Cal. June 10, 2005) (“In light of the lack of objectors to the plan of allocation at issue, and the competence, expertise,

⁶ Lead Counsel will provide the Court with a further update on the status of claims at the September 22, 2026, Settlement Hearing. Moreover, once the claims administration process is complete, SCS will submit a declaration in conjunction with Lead Counsel’s Motion for Class Distribution Order, which will set forth the final accepted and rejected claim numbers. *See* Stipulation ¶26.

1 and zeal of counsel in bringing and defending this action, the Court finds the plan of allocation as
 2 fair and adequate.”); *Mauss v. NuVasive, Inc.*, 2018 WL 6421623, at *4 (S.D. Cal. Dec. 6, 2018)
 3 (concluding that the proposed plan of allocation was fair and reasonable after noting “[t]he Plan of
 4 Allocation was described in detail in the notice and no class member objected.”); *In re Volkswagen*
 5 *“Clean Diesel” Mktg., Sales Practices, & Prod. Liab. Litig.*, 2019 WL 2077847, at *3 (N.D. Cal.
 6 May 10, 2019) (only one objection and 16 opt outs “supports [conclusion] that the settlement and
 7 plan of allocation are fair, reasonable, and adequate.”).

8 **C. The Settlement Class’s Reaction Supports Approval of the Fee and Expense** 9 **Application**

10 Finally, the reaction of the Settlement Class should be considered with respect to Lead
 11 Counsel’s motion for an award of attorneys’ fees and reimbursement of Litigation Expenses,
 12 including the request that Plaintiffs be reimbursed for the costs incurred as a direct result of their
 13 representation of the Settlement Class. *See In re Stable Road Acquisition Corp. Sec. Litig.*, 2024
 14 WL 3643393, at *14 (C.D. Cal. Apr. 23, 2024) (“the existence or absence of objectors to the
 15 requested attorneys’ fee is a factor [in] determining the appropriate fee award.”); *Omnivision*, 559
 16 F. Supp. 2d at 1048 (“The reaction of the class may also be a determining factor in ... determining
 17 the fee award.”).

18 Here, the absence of any objections from Settlement Class Members to the Fee and Expense
 19 Application supports a finding that the request is fair and reasonable. *See In re Immune Response*
 20 *Sec. Litig.*, 497 F. Supp. 2d 1166, 1177 (S.D. Cal. 2007) (“the lack of objection from any Class
 21 Member supports the attorneys’ fees award.”); *In re Banc of California Sec. Litig.*, 2020 WL
 22 1283486, at *1 (C.D. Cal. Mar. 16, 2020) (awarding 33% of \$19.75 million settlement fund where
 23 “over 35,000 copies of the Notice were disseminated to potential Class Members ... and no
 24 objections to the fees or expenses were filed by Class Members.”); *Waldbuesser v. Northrop*
 25 *Grumman Corp.*, 2017 WL 9614818, at *5 (C.D. Cal. Oct. 24, 2017) (finding receipt of only two
 26 objections to fee request, after mailing 210,000 notices, was “remarkably small given the wide
 27 dissemination of notice,” and “conclud[ing] that the lack of significant objections to the requested
 28 fees justifies an award of one-third of the [\$16.5 million] settlement fund.”); *Omnivision*, 559 F.

1 Supp. 2d at 1049 (awarding lead plaintiffs \$29,913.80 from the settlement fund in securities class
 2 action where class members were provided notice and “no one objected.”); *Kendall v. Odonate*
 3 *Therapeutics, Inc.*, 2022 WL 1997530, at *6 (S.D. Cal. June 6, 2022) (awarding 33⅓% of \$12.75
 4 million settlement fund and \$5,000 to Lead Plaintiff in securities class action where “no objections
 5 to the settlement or requested attorneys’ fees, costs, or incentive award have been filed.”).⁷

6 In sum, the complete absence of objections and opt-outs strongly militates in favor of a
 7 finding that: (i) the Settlement is fair, reasonable, and adequate; (ii) the proposed Plan of Allocation
 8 is fair and equitable; and (iii) Lead Counsel’s Fee and Expense Application is fair and reasonable.

9 **III. CONCLUSION**

10 Based on the foregoing and the entire record herein, Plaintiffs and Lead Counsel respectfully
 11 request that the Court: (i) approve the Settlement and Plan of Allocation as fair, reasonable,
 12 adequate, and in the best interest of the Settlement Class; (ii) award attorneys’ fees to Lead Counsel
 13 in the amount of 33⅓% of the Settlement Fund, plus Plaintiffs’ Counsel’s out-of-pocket expenses
 14 in the amount of \$212,118.98; and (iii) award \$5,000 to each of the three Plaintiffs as reimbursement
 15 for time spent representing the Settlement Class.⁸

22 ⁷ See also *NECA-IBEW Pension Trust Fund et al. v. Precision Castparts Corp., et al.*, No. 16-cv-
 23 01756, ECF No. 169 at 1-2 (D. Or. May 7, 2021) (awarding 33.3% of \$21 million settlement fund
 24 where “no objections to the fees or expenses were filed by Class Members.”); *Patel v. Axesstel,*
 25 *Inc.*, 2015 WL 6458073, at *9 (S.D. Cal. Oct. 23, 2015) (finding a \$3,000 PSLRA award to lead
 plaintiff reasonable and noting “the lack of any objection from the class members.”).

26 ⁸ The Settlement is conditioned on the entry of the [Proposed] Judgment. See Stipulation ¶¶30,
 27 31(e), 34; Ex. B. A conformed version of the [Proposed] Judgment, which incorporates the relevant
 28 dates and lack of objections and requests for exclusion, is submitted concurrently herewith, along
 with a [Proposed] Order Approving Plan of Allocation of Net Settlement Fund, and a [Proposed]
 Order Awarding Attorneys’ Fees and Reimbursement of Litigation Expenses. Plaintiffs and Lead
 Counsel respectfully request that the Court enter the accompanying proposed orders.

1
2 Dated: September 15, 2026

By: /s/ Casey E. Sadler

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23
24
25 *Counsel for Additional Plaintiff Michael F. Salbenblatt*
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27
28

PROOF OF SERVICE

I hereby certify that on this 15th day of September, 2026, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/ Casey E. Sadler
Casey E. Sadler

EXHIBIT 1

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARILYN EZZES, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VINTAGE WINE ESTATES, INC.,
PATRICK RONEY, KATHERINE
DEVILLERS, and KRISTINA JOHNSTON,

Defendants.

Case No. 2:22-cv-01915-GMN-DJA

**SUPPLEMENTAL DECLARATION OF
JOSEPHINE BRAVATA CONCERNING:
(A) MAILING/EMAILING OF NOTICE;
(B) REPORT ON REQUESTS FOR
EXCLUSION AND OBJECTIONS; AND
(C) CLAIMS RECEIVED TO DATE**

1 I, Josephine Bravata, declare as follows:

2 1. I am the Director of Quality Assurance at Strategic Claims Services (“SCS”), a
3 nationally recognized class action administration firm.¹ I have over twenty-five years of
4 experience specializing in the administration of class action cases. SCS was established in April
5 1999 and has administered over five hundred and seventy-five (575) class action cases since its
6 inception. I have personal knowledge of the facts set forth herein and, if called on to do so, I could
7 and would testify competently thereto.
8

9 **UPDATE ON MAILING/EMAILING NOTICE**

10 2. Pursuant to the Court’s Order Preliminarily Approving Settlement and Providing
11 for Notice, dated May 23, 2026 (ECF No. 122, the “Preliminary Approval Order”), the Court
12 authorized Lead Counsel to retain SCS as the Claims Administrator to supervise and administer
13 the notice procedure in connection with the proposed Settlement as well as the processing of
14 claims. I submit this declaration as a supplement to my earlier declaration, the Declaration of
15 Josephine Bravata Concerning: (A) Mailing/Emailing of Notice; (B) Publication of the Summary
16 Notice; and (C) Report on Requests for Exclusion and Objections, dated August 10, 2026 (ECF
17 No. 147-5, the “Initial Mailing Declaration”).
18

19 3. As set forth in the Initial Mailing Declaration, as of August 10, 2026, a total of
20 6,475 Postcard Notices had been mailed to potential Settlement Class Members either by SCS or
21 nominees.² The Initial Mailing Declaration also stated that there were 2,026 potential Settlement
22

23
24 ¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to
25 them in the Stipulation and Agreement of Settlement, dated April 24, 2026 (ECF No. 119-2, the
“Stipulation”).

26 ² Out of the 6,475 Postcard Notices mailed, 233 were returned as undeliverable. Of these, the
27 United States Postal Service provided forwarding addresses for nine, and SCS promptly mailed
28 another Postcard Notice to the updated addresses. The remaining 224 Postcard Notices returned as

1 Class Members for whom SCS received a valid email address. For these potential Settlement Class
2 Members, SCS emailed the link to the Notice of (I) Pendency of Class Action, Certification of
3 Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for
4 an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, and Proof of Claim and
5 Release Form (collectively, the "Notice Packet"). Additionally, as noted in the Initial Mailing
6 Declaration, SCS was notified by one nominee that it emailed 5,779 of its customers to notify them
7 of this Settlement and provided the link to the Notice Packet. Since the Initial Mailing Declaration
8 was filed, SCS received a request from a nominee for 40 Postcard Notices. In total, 14,320 potential
9 Settlement Class members were notified either by mailed Postcard Notice and/or emailed the link
10 to the Notice Packet.³

12 4. Accordingly, excluding the 179 Postcard Notices that remain undeliverable, a total
13 of 14,141 Postcard Notices and Notice Packets have been disseminated to potential Settlement
14 Class Members by first-class mail or email.

15 **UPDATE ON TOLL-FREE PHONE LINE**

16
17 5. SCS continues to maintain a toll-free telephone number (1-866-274-4004) for
18 potential Settlement Class Members to call and obtain information about the Settlement. SCS has
19 and will continue to promptly respond to each telephone inquiry and address Settlement Class
20 Members' inquiries through the administration process.

21
22 _____
23 undeliverable were "skip-traced" to obtain updated addresses and 45 were re-mailed to updated
addresses.

24 ³ The Initial Mailing Declaration stated that SCS received six requests from potential Settlement
25 Class Members for the Notice Packet to be mailed to them and SCS immediately mailed the Notice
26 Packet to these potential Settlement Class Members. Since the declaration was submitted, SCS
27 received and fulfilled an additional three requests for the Notice Packet to be mailed to potential
Settlement Class Members. In total, SCS received and sent nine Notice Packets to potential
Settlement Class Members.

UPDATE ON SETTLEMENT WEBSITE

6. On June 8, 2026, SCS established a website at www.VintageWineSecuritiesSettlement.com (“Settlement Website”). The Settlement Website is accessible 24 hours a day, 7 days a week. The Settlement Website contains: (a) a Home page with general information regarding the Settlement, and a chart setting forth important dates; (b) an Important Documents page; (c) a File a Claim Online page; (d) a Representative Filers page; and (e) a Contact Us page.

7. At the request of Lead Counsel, on August 19, 2026, SCS updated the Settlement Website to include downloadable PDF copies of: (a) the Plaintiffs’ Notice of Unopposed Motion and Motion for Final Approval of Class Action Settlement and Plan of Allocation and Memorandum of Law in Support Thereof (ECF No. 123); (b) the Lead Counsel’s Notice of Motion and Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses, and Memorandum of Law in Support Thereof (ECF No. 124); and (c) the Declaration of Casey Sadler in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses with exhibits (ECF No. 125).

8. To date, the Settlement Website has received 6,322 pageviews from 1,239 unique users.

9. The Settlement Website will continue to be updated with relevant case information and Court documents throughout the administration process.

UPDATE ON REPORT ON EXCLUSIONS AND OBJECTIONS

10. The Postcard Notice, Notice, Summary Notice, and Settlement Website informed potential Settlement Class Members that the deadline to request exclusion from the Settlement Class was received by or postmarked no later than September 1, 2026. The Notice also set forth the information that must be included in each request for exclusion. SCS has been monitoring all mail delivered for this case. To date, SCS has not received any exclusion requests.

11. The Postcard Notice, Notice, Summary Notice, and Settlement Website further informed Settlement Class Members that the objection deadline was September 1, 2026. The Notice also provides that written objections must have been submitted to the Clerk of the Court, as well as mailed to Lead Counsel and Defendants' Counsel, such that they were received on or before the deadline. As of the date of this declaration, SCS has not been notified of any objections or received any misdirected objections.

CLAIMS RECEIVED TO DATE

12. The Postcard Notice, Notice, Summary Notice and Settlement Website informed potential Settlement Class Members that if they wished to participate in the Settlement they must submit a Proof of Claim and Release Form to SCS, with supporting documentation, postmarked or received no later than October 9, 2026.

13. It is SCS's experience that the vast majority of claims are submitted close to, or on, the claim filing deadline. This is because most institutional investors, brokers, and other nominees typically file claims electronically at or near the claims filing deadline.

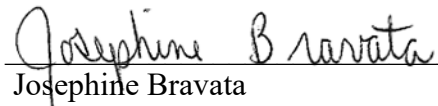
14. As of the date of this declaration, SCS has received 280 claims. Of the 280 Claim Forms received to date, 199 have been provisionally processed. SCS has preliminarily determined that, of the 199 Claim Forms that SCS has processed, 96 are acceptable in whole, 65 are acceptable

1 in part, and 38 should be wholly rejected because they are either ineligible, wholly deficient, or
2 have no Recognized Loss when calculated in accordance with the proposed Plan of Allocation.

3 15. The figures in paragraph 14 are preliminary and subject to change. Among other
4 things, (a) the submitted claims are subject to further analysis, audit, fraud checks, and quality
5 assurance; and (b) some of the claims contain deficiencies that Claimants will be given the
6 opportunity to cure, or have been given the opportunity to cure and that process is ongoing. SCS
7 will provide the Court with a comprehensive report on the acceptance and rejection of claims in
8 conjunction with Lead Counsel's Motion for Distribution of the Net Settlement Fund.
9

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Signed this 14th day of September 2026, in Media, Pennsylvania.

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16 Josephine Bravata
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