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Case #19CV357070
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EXHIBIT 2

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF SANTA CLARA**

18 IN RE MAXAR TECHNOLOGIES, INC.)
19 SHAREHOLDER LITIGATION)

Case No. 19CV357070

CLASS ACTION

20 This Document Relates To:
21 ALL ACTIONS

**DECLARATION OF MICHAEL
MCCURDY IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date Action Filed: October 21, 2019
Dept. 1
Judge: Hon. Sunil R. Kulkarni
Hearing: June 8, 2023, 1:30 P.M.

1 I, Michael McCurdy, declare as follows:

2 1. I am the named plaintiff in the above-captioned action. I submit this declaration in
3 support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement. The following
4 facts are based upon my personal knowledge and if called upon to do so, I could, and would,
5 competently testify thereto. I reside in Alexandria, Minnesota.

6 2. I have spent significant time communicating with my lawyers about the facts and the
7 law related to this case, including the requirements for serving as a class representative. I
8 ultimately decided to be a plaintiff and class representative in this case to assert not only my own
9 rights, but to assert the rights of other similar Maxar shareholders. Since becoming plaintiff and
10 class representative, I have diligently and earnestly fulfilled my obligation, and believe that I
11 meaningfully assisted in obtaining the settlement for the class.

12 3. I have participated in this litigation at every stage from its commencement through
13 class certification and settlement discussions. I have been in regular contact with my attorneys
14 during the course of this matter.

15 4. I estimate that I have spent approximately 40 hours of my time on this litigation to
16 date. Among other things, I have spent time researching facts related to Maxar and my rights in
17 bringing a class action lawsuit; discussing with and otherwise communicating with my attorneys;
18 gathering documents and information requested by my attorneys; reviewing pleadings and other
19 case materials in the action; responding to discovery served by defendants; preparing and sitting for
20 a deposition; discussing the settlement with my attorneys; and reviewing and approving the
21 settlement terms.

22 5. I have fairly represented the absent class members and request that the Court
23 approve this settlement.

24 6. As class representative in this action, I held a certain amount of risk that other class
25 members did not bear. Moreover, I assumed a risk by coming forward and filing this class action.
26 As a result of my stepping forward and authorizing investigation and prosecution of this action;

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1 however, class members will receive the benefits of the settlement to compensate them for the
2 injuries related to their acquisition of Maxar stock.

3 7. Based on the foregoing, I respectfully request that the Court authorize a service
4 award of no more than \$10,000.

5 I declare under penalty of perjury under the laws of the United States that the foregoing is
6 true and correct.

7 Executed this ³ ___ day of May 2023.

8 DocuSigned by:
Mike McCurdy
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9 _____
Michael McCurdy

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