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14 *Co-Lead Counsel for Plaintiff and the Class*

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

17 _____) Case No. 19CV357070
18 IN RE MAXAR TECHNOLOGIES INC.)
19 SHAREHOLDER LITIGATION) CLASS ACTION
20 _____) **COMPLIANCE REPORT**
21 This Document Relates To:) Date Action Filed: October 21, 2019
22 ALL ACTIONS) Dept. 7
23) Judge: Hon. Charles F. Adams
24) Hearing: August 15, 2024
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County of Santa Clara,
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Case #19CV357070
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1 Pursuant to the Court’s December 11, 2023 Order Concerning Motions for: A) Final Approval
2 of Settlement; and B) Attorney Fees and Costs (“Final Approval Order”), Plaintiff Michael McCurdy
3 (“Plaintiff”) respectfully provides the Court with the following compliance report.¹

4 On December 11, 2023, the Court granted final approval of the \$36,500,000.00 settlement,
5 awarded Co-Lead Counsel attorneys’ fees and reimbursement of litigation expenses, and granted a
6 service award to Plaintiff. Final Approval Order at pp. 12-14. The Final Approval Order also approved
7 up to \$500,000.00 in notice and administration expenses to the Claims Administrator, A.B. Data (*see id.*
8 at pp. 7-8, 13-14), and further approved distribution of the Net Settlement Funds to Authorized
9 Claimants on a pro rata basis (*see id.* at pp. 11, 13-14). As noted below, and described in the Declaration
10 of Eric Nordskog Regarding Post-Distribution Accounting (“Nordskog Decl.”) submitted herewith, the
11 distribution process remains open as the initial check void date, set for September 14, 2024, has not
12 occurred. Nordskog Decl., ¶ 6. Plaintiff intends, however, to provide a summary accounting of the
13 distribution of the Net Settlement Fund following the initial void date.

14 Including interest earned on the fund and net of Court-approved fees and expenses,
15 \$23,391,061.05 remained in the Net Settlement Fund to be distributed to Authorized Claimants.
16 Nordskog Decl., ¶ 6 & Ex. A. On May 17, 2024, A.B. Data sent distribution payments totaling
17 \$23,391,061.05 to 2,757 Class Members. *Id.*

18 Class Members were provided with a 120-day period to deposit their checks before they became
19 void. *Id.*, ¶ 6. The payments included A.B. Data’s contact information in the event a Class Member had
20 questions or needed their check reissued due to a name change. *Id.*

21 As of the date of this Compliance Report, Authorized Claimants cashed 2,428 checks resulting
22 in payments totaling \$20,712,765.84 and representing a cash rate of 88.55%. *Id.*, ¶ 7. Consequently,
23 there are 329 distributed checks not cashed, totaling \$2,678,295.21. *Id.*, Ex. A. After all checks are
24 void and reasonable efforts to encourage Class Members to cash their payments have been exhausted,
25 the Claims Administrator will consult with Co-Lead Counsel and assess whether enough money remains
26

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28 ¹ Unless otherwise defined herein, all capitalized terms have the same meaning as set forth in the
Stipulation of Settlement, dated May 5, 2023 (the “Settlement Agreement”).

1 in the Net Settlement Fund for a secondary distribution to Class Members that cashed their initial
2 payment. *Id.*, ¶ 7. If a secondary distribution is not recommended, the remains in the Net Settlement
3 Fund will be donated to the Legal Aid Society of Santa Clara County pursuant to the Settlement
4 Agreement. *See* Settlement Agreement, ¶ 7.8; Nordskog Decl., ¶ 7. There are no unresolved issues nor
5 any other matters appropriate to bring to the Court’s attention in this Compliance Report.

6 Plaintiff proposes that the Court set a further compliance hearing for a date in November 2024
7 to provide counsel with sufficient time following the September 14, 2024 initial void date to: furnish the
8 Court with an updated summary accounting of the distribution of the Net Settlement Fund; raise the
9 status of any unresolved issues or any other matters with the Court; and provide an amended judgment
10 pursuant to California Code of Civil Procedure § 384(b).

11
12 DATED: August 6, 2024

GIRARD SHARP LLP

13
14 /s/ Adam E. Polk

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Co-Lead Counsel for Plaintiff and the Class

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2024, I served the foregoing document on all counsel on record through One Legal e-filing system.

/s/ Adam E. Polk _____
Adam E. Polk

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