

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CARRIE SCHEUFELE, JEFFREY SCHEUFELE : Civil Action No. 1:17-cv-05753-JGK
and NICHOLAS ORAM, Individually and on Behalf :
of All Others Similarly Situated, : CLASS ACTION
: :
Plaintiffs, :
: :
vs. :
: :
TABLEAU SOFTWARE, INC., CHRISTIAN :
CHABOT, THOMAS WALKER, PATRICK :
HANRAHAN and CHRISTOPHER STOLTE, :
Defendants. :
_____ X

NOTICE OF PENDENCY OF CLASS ACTION

TO: ALL PERSONS AND ENTITIES THAT PURCHASED OR OTHERWISE ACQUIRED TABLEAU SOFTWARE, INC.'S CLASS A COMMON STOCK BETWEEN FEBRUARY 5, 2015 AND FEBRUARY 4, 2016, INCLUSIVE, AND WERE DAMAGED THEREBY.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY A CLASS ACTION LITIGATION PENDING IN THIS COURT.

This Notice is given pursuant to Rule 23 of the Federal Rules of Civil Procedure and an order of the United States District Court for the Southern District of New York (the "Court"). The purpose of this Notice is to inform you: (1) of the pendency of this lawsuit (the "Litigation") against the Defendants;¹ (2) how it might affect your rights; and (3) what steps you may take in relation to it.

The Court has not determined that Defendants did anything wrong and this Notice is not an admission by Defendants or an expression of any opinion of the Court concerning the merits of the lawsuit, or a finding by the Court that the claims asserted by the Plaintiff in this case are valid.

The Court certified a "Class" that includes all persons and entities that purchased or otherwise acquired Tableau Class A common stock between February 5, 2015 and February 4, 2016, inclusive (the "Class Period"), and were damaged thereby. By certifying the Class and issuing this Notice, the Court is not suggesting that the Plaintiff will win or lose this case. The Plaintiff will attempt to prove its claims in proceedings that have not yet occurred. If you or someone acting on your behalf purchased or otherwise acquired Tableau Class A common stock during this time period, you may be a "Class Member" entitled to participate in any benefits that may eventually be obtained for the Class as a result of this Litigation. This Notice provides a summary of the Litigation, describes who is eligible to be included in the Class and the effect of participating in this class action, and explains how to request exclusion from the Class.

I. DESCRIPTION OF THE LITIGATION

This is a securities class action alleging violations of the Securities Exchange Act of 1934 brought against Tableau and certain of Tableau's then-officers and/or directors during the Class Period. The case is presently pending before United States District Judge John G. Koeltl and is captioned *Scheufele, et al. v. Tableau Software, Inc., et al.*, Civil Action No. 17-CV-05753-JGK. On October 18, 2017, the Court appointed The Plumbers and Pipefitters National Pension Fund ("Plaintiff") as Lead Plaintiff pursuant to the requirements of the Private Securities Litigation Reform Act of 1995.

Tableau designs, develops, and sells business intelligence and analytics software. Throughout the Class Period, Tableau Class A common stock traded on the New York Stock Exchange under the symbol "DATA." Plaintiff alleges that Defendants violated the Securities Exchange Act of 1934 by knowingly or recklessly making materially false statements and omissions to the public during the Class Period regarding threats from competitors and the nature of the Company's competitive landscape while selling personally held Tableau stock. Plaintiff further alleges that the Company's stock price

¹ "Defendants" are Tableau Software, Inc. ("Tableau" or the "Company") and certain of its former officers and/or directors. Details regarding the parties to this lawsuit can be accessed at the case website.

declined and members of the Class suffered damages when the true facts concerning Defendants' alleged misrepresentations and omissions were revealed. Plaintiff seeks to recover money damages for members of the Class.

Defendants deny Plaintiff's allegations that they knowingly, or otherwise, made any material misstatements or omissions and assert they have valid defenses to each of Plaintiff's claims. Defendants also deny that the prices of Tableau Class A common stock were artificially inflated by reason of the alleged misrepresentations, omissions, or otherwise, during the Class Period, or that the conduct alleged caused any losses allegedly experienced by, or otherwise harmed, any member of the Class. Defendants filed answers to Plaintiff's operative complaint denying the allegations and asserting multiple defenses. Litigation is ongoing. No trial date has yet been set by the Court.

Copies of the pleadings, orders and other documents filed in this Litigation may be examined and copied at any time on the Public Access to Court Electronic Records website, www.pacer.gov. In addition, relevant case materials can be accessed at the case website:

www.TableauSecuritiesLitigation.com

II. CLASS DEFINITION

On January 16, 2020, the Court certified the Class, appointed Plaintiff as Class Representative for the Class and appointed Robbins Geller Rudman & Dowd LLP as "Class Counsel." The Class is defined as:

All persons and entities that purchased or otherwise acquired shares of Tableau Software, Inc.'s ("Tableau") Class A common stock between February 5, 2015 and February 4, 2016, inclusive, and were damaged thereby. Excluded from the Class are Defendants, present or former executive officers of Tableau, and their immediate family members (as defined in 17 C.F.R. §229.404, Instructions (1)(a)(iii) and 1(b)(ii)).

III. RIGHTS OF CLASS MEMBERS

A. Remaining a Class Member

This Notice is provided to you because you may be a member of the Class certified in this Litigation. The receipt of the Notice, however, should not be construed as a determination that you are a member of the Class. You are a Class Member only if you purchased or otherwise acquired Tableau Class A common stock during the Class Period, from February 5, 2015 to and including February 4, 2016, and suffered damages on such purchases or acquisitions. To remain a Class Member, you are not required to do anything at this time. If you do not exclude yourself from the Class in the manner described below, you will be bound by any judgment in this Litigation, whether it is favorable or unfavorable, and additional proceedings may be necessary in order to demonstrate your right to any recovery.

If you choose to remain a Class Member, you may not pursue a lawsuit on your own with regard to any of the claims asserted or issues decided in this Litigation. As a Class Member, you will be represented by Class Counsel (see §V). You will not be charged a fee for the services of Class Counsel. If the Litigation results in a recovery, however, Class Counsel will apply to the Court to be paid some portion of whatever is recovered for the Class. The amount of any fee and expense award will ultimately be determined by the Court. You may also enter an appearance in this case through counsel of your own choosing and at your own expense, if you so desire.

B. Exclusion from the Class

If you want to be excluded from the Class, you may submit a request for exclusion. Your request for exclusion must be in writing (including your full name and address), and must be postmarked no later than July 21, 2020, and mailed to:

**Tableau Securities Litigation
Notice Administrator
c/o Gilardi & Co. LLC
150 Royall Street, Suite 101
Canton, MA 02021**

To be effective, your request for exclusion must be signed by you, state that you wish to be excluded, set forth your full name and address, identify the date and number of shares of Tableau Class A common stock you purchased or acquired during the Class Period, and be postmarked no later than July 21, 2020. If you are signing on behalf of a Class Member (such as an estate, corporation or partnership), please indicate your full name and the basis of your authority. Facsimile and email requests for exclusion are not acceptable. Requests for exclusion that do not comply with the above requirements will be invalid, in which case you will not be excluded from the Class.

If you properly exclude yourself from the certified Class, you will not be bound by any judgment in this Litigation, and you will also not be entitled to share in any recovery that may result from it. If you properly request exclusion, you may not be able to assert individual claims asserting securities law violations against the Defendants, as such claims may

be time-barred. It will be for you to decide whether to pursue any individual lawsuit, claim or remedy that you may have, at your own expense. You should seek legal advice to determine if your claims would be barred by the applicable statutes of limitation or repose.

Do not request exclusion if you wish to be a Class Member in this Litigation.

IV. SECURITIES BROKERS AND NOMINEES

Brokers and nominees who purchased or otherwise acquired Tableau Class A common stock during the Class Period for the beneficial ownership of another are requested to send a list of the names and addresses of such beneficial owners to Gilardi & Co. LLC (“Gilardi” or the “Notice Administrator”) at notifications@gilardi.com or at the following address no later than 10 days after receipt of Notice of this Litigation:

**Tableau Securities Litigation
Notice Administrator
c/o Gilardi & Co. LLC
Post Office Box 43398
Providence, RI 02940-3398**

The Notice Administrator will thereafter mail copies of this Notice directly to all such beneficial owners. Class Counsel will reimburse the reasonable and actually incurred costs of preparing a list of the names and addresses of such beneficial owners. Brokers and nominees that prefer to mail Notices themselves may request the required number of Notices from the Notice Administrator, and Class Counsel will reimburse the reasonable and actually incurred costs of mailing such Notices.

V. CLASS COUNSEL

The Court has appointed Robbins Geller Rudman & Dowd LLP as Class Counsel for the Class. If you have any questions concerning any matter raised in this Notice, you may address them in writing to the address below or by telephone to:

**David A. Rosenfeld
ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
www.rgrdlaw.com**

VI. NOTICE ADMINISTRATOR

If you have any corrections or changes of name or address, you may address them in writing to:

**Tableau Securities Litigation
Notice Administrator
c/o Gilardi & Co. LLC
Post Office Box 43398
Providence, RI 02940-3398**

**PLEASE DO NOT TELEPHONE OR CONTACT THE COURT OR
THE CLERK’S OFFICE REGARDING THIS NOTICE**

DATED: May 12, 2020

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Tableau Securities Litigation
Notice Administrator
c/o Gilardi & Co. LLC
P.O. Box 43398
Providence, RI 02940-3398

TUU

«Barcode»

Postal Service: Please do not mark barcode

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«Country»