## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CARRIE SCHEUFELE, JEFFREY SCHEUFELE and NICHOLAS ORAM, Individually and on Behalf of All Others Similarly Situated,

Civil Action No. 1:17-cv-05753-JGK

**CLASS ACTION** 

Plaintiffs,

VS.

TABLEAU SOFTWARE, INC., CHRISTIAN CHABOT, THOMAS WALKER, PATRICK HANRAHAN and CHRISTOPHER STOLTE.

Defendants.

PROOF OF CLAIM AND RELEASE

### I. GENERAL INSTRUCTIONS

- 1. To recover as a Member of the Class based on your claims in the action entitled *Scheufele*, et al. v. Tableau Software, Inc., et al., Civil Action No. 1:17-cv-05753-JGK (S.D.N.Y.) (the "Litigation"), you must complete and, on page 6 hereof, sign this Proof of Claim and Release form. If you fail to submit a timely and properly addressed (as set forth in paragraph 3 below) Proof of Claim and Release, your claim may be rejected and you may not receive any recovery from the Net Settlement Fund created in connection with the proposed Settlement.
- 2. Submission of this Proof of Claim and Release, however, does not assure that you will share in the proceeds of the Settlement of the Litigation.
- 3. YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM AND RELEASE, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, NO LATER THAN AUGUST 24, 2021, ADDRESSED AS FOLLOWS:

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

Online Submissions: www.TableauSecuritiesLitigation.com

- 4. If you are NOT a Member of the Class, as defined in the Notice of Proposed Settlement of Class Action ("Notice"), DO NOT submit a Proof of Claim and Release or direct a third party to file one on your behalf.
- 5. If you did not previously request exclusion in response to the Notice of Pendency of Class Action provided in June 2020, you are a Class Member and you will be bound by the terms of any judgment entered in the Litigation, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM AND RELEASE.

### II. CLAIMANT IDENTIFICATION

If you purchased or acquired Tableau Software, Inc. ("Tableau") Class A common stock and held the certificate(s) in your name, you are the beneficial purchaser or acquirer as well as the record purchaser or acquirer. If, however, you purchased Tableau Class A common stock and the certificate(s) were registered in the name of a third party, such as a nominee or brokerage firm, you are the beneficial purchaser or acquirer and the third party is the record purchaser or acquirer.

Use Part I of this form entitled "Claimant Identification" to identify each purchaser or acquirer of record ("nominee"), if different from the beneficial purchaser or acquirer of the Tableau Class A common stock, that forms the basis of this claim. THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL PURCHASER(S) OR ACQUIRER(S) OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER(S) OR ACQUIRER(S) OF THE TABLEAU CLASS A COMMON STOCK UPON WHICH THIS CLAIM IS BASED.

All joint purchasers or acquirers must sign this claim. Executors, administrators, guardians, conservators, and trustees or others acting in a representative capacity on behalf of a Class Member must complete and sign this claim on behalf of persons represented by them, and submit evidence of their current authority to act on behalf of that Class Member, including stating their titles or capacities. The Social Security (or taxpayer identification) number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

### III. CLAIM FORM

Use Part II of this form entitled "Schedule of Transactions in Tableau Class A Common Stock" to supply all required details of your transaction(s) in Tableau Class A common stock. If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

On the schedules, provide all of the requested information with respect to **all** of your purchases or acquisitions and **all** of your sales of Tableau Class A common stock which took place during the period from February 5, 2015 through and including May 4, 2016, whether such transactions resulted in a profit or a loss. You must also provide all of the requested information with respect to **all** of the Tableau Class A common stock you held at the close of trading on February 4, 2015, February 4, 2016, and May 4, 2016. Failure to report all such transactions may result in the rejection of your claim.

List each transaction separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

The date of covering a "short sale" is deemed to be the date of purchase or acquisition of Tableau Class A common stock. The date of a "short sale" is deemed to be the date of sale of Tableau Class A common stock.

For each transaction, copies of broker confirmations or other documentation of your transactions in Tableau Class A common stock should be attached to your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim.

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. This is different from the online submission process that is available at www.TableauSecuritiesLitigation.com. All claimants *must* submit a manually signed paper Proof of Claim and Release form whether or not they also submit electronic copies. If you have a large number of transactions and wish to file your claim electronically, you must contact the Claims Administrator at edata@gilardi.com to obtain the required file layout.

Official Office Use Only



Must Be Postmarked (if Mailed) or Received (if Submitted Online) No Later Than August 24, 2021

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# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Scheufele, et al. v. Tableau Software, Inc., et al. Civil Action No. 1:17-cv-05753-JGK

## **PROOF OF CLAIM AND RELEASE**

<u>Please Type or Print in the Boxes Below</u> Do <u>NOT</u> use Red Ink, Pencil, or Staples

PART I: CLAIMANT IDENTIFICATION										
Last Name	M.I. First Name									
Last Name (Co-Beneficial Owner)	M.I. First Name (Co-Beneficial Owner)									
IRA Joint Tenancy Employee	Other									
Company Name (Beneficial Owner - If Claimant is not an Individ	ual) or Custodian Name if an IRA (specify)									
Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)										
Account#/Fund# (Not Necessary for Individual Filers)										
Last Four Digits of Social Security Number Taxpayer Ide	ntification Number									
or —										
Telephone Number (Primary Daytime)  Telephone	e Number (Alternate)									
Email Address										
MAIL ING INFORMATION										
Address MAILING INFORMATION										
Address										
City	State ZIP Code									
Foreign Province Foreign Posta	I Code Foreign Country Name/Abbreviation									
FOR CLAIMS PROCESSING OB CB ATP BE FL KE DR ME	OP RE MM / DD / Y Y Y Y PROCESSIN ONLY									
ONLY ICI EM ND	SH ONLY									



## PART IV. SCHEDULE OF TRANSACTIONS IN TABLEAU CLASS A COMMON STOCK

Α.	A. Number of shares of Tableau Class A common stock held at the close of trading on February 4, 2015:																									
B. Purchases or acquisitions of Tableau Class A common stock (February 5, 2015 – May 4, 2016, inclusive):																										
Trade Date(s) of Shares (List Chronologically)								Number of Shares Purchased or Acquired					Total Purchase or Acquisition Price (Excluding Commissions, Taxes and Fees). Please round off to the nearest whole dollar							f	Proof of Purchase Enclosed?					
	М	M	D	D	,	ΥY	<b>'</b>	Υ	Υ																	ΟY
1.		/			/												\$								00	O N
2.		/			/												\$								00	O Y O N
3.		/			/												\$								00	O Y O N
4.		/	'		/												\$								00	O Y O N
5.		/			/												\$								00	O Y O N
(ii)	IMPORTANT: (i) If any purchase listed covered a "short sale," please mark Yes: Yes  (ii) If you received shares through an acquisition or merger, please identify the date, the share amount and the company acquired:  M M D D Y Y Y Y Merger Shares: Company:																									
C.	C. Sales of Tableau Class A common stock (February 5, 2015 – May 4, 2016, inclusive):																									
Trade Date(s) of Shares (List Chronologically)						Number of Shares Sold					Total Sales Price (Excluding Commissions, Taxes and Fees). Proof of Please round off to Sales the nearest whole dollar Enclosed?							ales								
	М	М	D	D		ΥY	/ `	Υ	Υ																	ΟY
1.		/			/												\$								00	O N
2.		/			/												\$								00	O Y O N
3.		/	'		/												\$								00	O Y O N
4.		/	'		/												\$								00	O Y O N
5.		/	'		/												\$								00	O Y O N
D. Number of shares of Tableau Class A common stock held at the close of trading on February 4, 2016:  Proof Enclosed?  Y N																										
E. Number of shares of Tableau Class A common stock held at the close of trading on May 4, 2016:									ed? N																	

If you require additional space, attach extra schedules in the same format as above.

Sign and print your name on each additional page.

YOU MUST READ AND SIGN THE RELEASE ON PAGE 6. FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.



### IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

On behalf of myself (ourselves) and each of my (our) heirs, agents, executors, trustees, administrators, predecessors, successors and assigns, I (we) submit this Proof of Claim and Release under the terms of the Stipulation of Settlement described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the Southern District of New York with respect to my (our) claim as a Class Member and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Litigation. I (We) agree to furnish additional information to the Claims Administrator to support this claim (including transactions in other Tableau securities) if requested to do so. I (We) have not submitted any other claim covering the same purchases, acquisitions or sales of Tableau Class A common stock during the Class Period and know of no other person having done so on my (our) behalf.

### V. RELEASE

- 1. Upon the Effective Date of the Settlement, I (we) acknowledge full and complete satisfaction of, and fully, finally, and forever settle, release, and discharge from the Released Claims each and all of the "Released Defendant Parties," defined as each and all of the Defendants, Defendants' Counsel, and any of their Related Parties, as set forth fully in ¶4.1 of the Stipulation of Settlement. "Related Parties" means any Person's former, present or future parents, subsidiaries, divisions, controlling persons, associates, related entities and affiliates, any entity in which a Person has a controlling interest, and each and all of their respective present and former employees, members, partners, principals, officers, directors, controlling shareholders, agents, attorneys, advisors (including financial or investment advisors), accountants, auditors, consultants, underwriters, investment bankers, commercial bankers, entities providing fairness opinions, general or limited partners or partnerships, limited liability companies, members, joint ventures and insurers and reinsurers or co-insurers of each of them; as well as the predecessors, successors, estates, immediate family members, spouses, heirs, executors, trusts, trustees, administrators, agents, legal or personal representatives, assigns, and assignees of each of them, in their capacity as such.
- 2. "Released Claims" means any and all rights, liabilities, suits, debts, obligations, demands, damages, losses, judgment matters, issues, claims (including "Unknown Claims," as defined below), and causes of action of every nature and description whatsoever, in law, equity, or otherwise, whether known or unknown, asserted or unasserted, accrued or unaccrued, fixed or contingent, liquidated or unliquidated, whether arising under federal, state, local, statutory, common or foreign law, or any other law, rule, or regulation, whether class, derivative (other than derivative actions expressly excluded herein), and/or individual in nature, based on, arising out of, or in connection with: (i) the purchase and/or acquisition of Tableau publicly traded Class A common stock by any Class Member during the Class Period; and/or (ii) the facts, matters, events, transactions, acts, occurrences, statements, representations, misrepresentations and/or omissions which were or could have been alleged in this Litigation. "Released Claims" does not include: (i) the shareholder derivative claims asserted in *In re Tableau Software, Inc. and Salesforce.com, Inc. Derivative Litigation*, Case No. 1:20-cv-00467-SB, and its consolidated member (Case No. 1:18-cv-01192-SB), pending in the United States District Court for the District of Delaware; (ii) ERISA claims; and (iii) claims to enforce the Settlement.
- 3. "Unknown Claims" means (a) any and all Released Claims which any of the Releasing Plaintiff Parties do not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Parties, which, if known by him, her, or it, might have affected his, her, or its settlement with and release of the Released Defendant Parties, or might have affected his, her, or its decision(s) with respect to the Settlement, including, but not limited to, whether or not to object to this Settlement; and (b) any and all Released Defendants' Claims that any of the Released Defendant Parties do not know or suspect to exist in his, her, or its favor at the time of the release of Lead Plaintiff, the Class and Lead Plaintiff's Counsel, which, if known by him, her, or it, might have affected his, her, or its settlement and release of Lead Plaintiff, the Class and Lead Plaintiff's Counsel. With respect to (a) any and all Released Claims against the Released Defendant Parties, and (b) any and all Released Defendants' Claims against Lead Plaintiff, the Class and Lead Plaintiff's Counsel, the Settling Parties stipulate and agree that, upon the Effective Date, the Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have, expressly waived the provisions, rights, and benefits of California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

The Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have, expressly waived any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to California Civil Code §1542. The Releasing Plaintiff Parties and Released Defendant Parties acknowledge that they may hereafter discover facts, legal theories or authorities in addition to or different from those which he, she, it or their counsel now knows or believes to be true with respect to the subject matter of the Released Claims or Released Defendants' Claims, but (a) the Releasing Plaintiff Parties shall expressly fully, finally, and forever waive, compromise, settle, discharge, extinguish and release, and each Releasing Plaintiff Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and, upon the Effective Date, and by operation of the Judgment, shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Claims against the Released Defendant Parties, known or unknown, suspected or unsuspected, contingent or non-contingent, accrued or unaccrued, whether or not concealed or hidden, which now exist, or heretofore have



existed, or may hereafter exist, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities, and (b) the Released Defendant Parties shall expressly fully, finally, and forever waive, compromise, settle, discharge, extinguish and release, and, upon the Effective Date, and by operation of the Judgment, shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Defendants' Claims against Lead Plaintiff, the Class and Lead Plaintiff's Counsel, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. The Settling Parties acknowledge, and the Releasing Plaintiff Parties and Released Defendant Parties shall be deemed by operation of the Judgment to have acknowledged, that the foregoing waiver was separately bargained for and is an essential element of the Settlement of which this release is a part.

- 4. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.
- 5. I (We) hereby warrant and represent that I (we) have included the information requested about all of my (our) transactions in Tableau Class A common stock which are the subject of this claim, which occurred during the Class Period, as well as the opening and closing positions in such shares held by me (us) on the dates requested in this claim form.

I declare under penalty of perjury under the laws of the United States of America that all of the foregoing information supplied on this Proof of Claim and Release by the undersigned is true and correct.

Executed this	day of			
		(Month/Year)		(City/State/Country)
(Sign your name here)			(Sign your nam	e here)
(Type or print your name here	e)		(Type or print y	our name here)
(Capacity of person(s) signing		r Administrator)		rson(s) signing, <i>e.g.</i> , haser or Acquirer, Executor or Administrator)

## ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME. THANK YOU FOR YOUR PATIENCE.

### Reminder Checklist:

- 1. Please sign the above release and acknowledgment.
- 2. If this claim is being made on behalf of Joint Claimants, then both must sign.
- 3. Remember to attach copies of supporting documentation, if available.
- 4. Do not send originals of certificates.
- 5. Keep a copy of your claim form and all supporting documentation for your records.
- If you desire an acknowledgment of receipt of your claim form, please send it Certified Mail, Return Receipt Requested.
- 7. If you move, please send your new address to the address below.
- 8. **Do not use red pen or highlighter** on the Proof of Claim and Release or supporting documentation.

## THIS PROOF OF CLAIM AND RELEASE MUST BE SUBMITTED ONLINE OR MAILED NO LATER THAN AUGUST 24, 2021, ADDRESSED AS FOLLOWS:

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

