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.

SUPPLEMENTAL DECLARATION OF ROSS D. MURRAY REGARDING NOTICE DISSEMINATION AND REQUESTS FOR EXCLUSION RECEIVED TO DATE

I, ROSS D. MURRAY, declare and state as follows:

- 1. I am employed as a Vice President of Securities by Gilardi & Co. LLC ("Gilardi"), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court's May 7, 2021 Order Granting Preliminary Approval Pursuant to Fed. R. Civ. P. 23(e)(1) and Permitting Notice to the Class ("Notice Order"), Gilardi was appointed to supervise and administer the notice procedure as well as the processing of claims in connection with the proposed Settlement of the above-captioned litigation (the "Litigation"). I oversaw the notice services that Gilardi provided in accordance with the Notice Order.
- 2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (the "Initial Mailing Declaration") (ECF No. 187). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE

- 3. As more fully detailed in the Initial Mailing Declaration, as of August 5, 2021, Gilardi had mailed 78,846 copies of the Court-approved Notice of Proposed Settlement of Class Action (the "Notice") and Proof of Claim and Release form (the "Proof of Claim") (collectively, the "Claim Package") to potential Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.
- 4. Since August 5, 2021, Gilardi has mailed an additional 15 copies of the Claim Package in response to requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of August 30, 2021, Gilardi has mailed a total of 78,861 Claim Packages to potential Class Members and nominees.

¹ All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated April 16, 2021 (the "Stipulation") (ECF No. 173).

REQUESTS FOR EXCLUSION RECEIVED TO DATE

- 5. The Notice of Pendency mailed in June 2020 informed potential Class Members that written requests for exclusion from the Class must be mailed to *Tableau Securities Litigation*, Notice Administrator, c/o Gilardi & Co. LLC, EXCLUSIONS, 150 Royall Street, Suite 101, Canton, MA 02021, such that they were postmarked no later than July 21, 2020. At the time of the Initial Mailing Declaration, Gilardi had received four requests for exclusion from the Class at this mailing address. *See* Initial Mailing Declaration, ¶16.
- 6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, no additional Class Members have attempted to exclude themselves from the Class in response to either the Notice of Pendency or the Notice.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 30th day of August, 2021, at San Rafael, California.

ROSS D. MURRAY

CERTIFICATE OF SERVICE

I, David A. Rosenfeld, hereby certify that on September 7, 2021, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to received such notice. I further certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed September 7, 2021, at Melville, New York.

