

BLEICHMAR FONTI & AULD LLP

Joseph A. Fonti (*pro hac vice*)
George N. Bauer (*pro hac vice*)
300 Park Avenue, Suite 1301
New York, New York 10022
jfonti@bfalaw.com
gbauer@bfalaw.com
Tel: (212) 789-1340
Fax: (212) 205-3960

*Counsel for Lead Plaintiff Jean-Pierre Murray,
and Lead Counsel for the Class*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ALBERT CHOW, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ENOCHIAN BIOSCIENCES INC.,
MARK DYBUL, RENÉ SINDLEV,
and CARL SANDLER,

Defendants.

Case No. 8:22-cv-01374-JWH-JDE

CLASS ACTION

**DECLARATION OF GEORGE N.
BAUER IN SUPPORT OF LEAD
PLAINTIFF’S UNOPPOSED
MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS
ACTION SETTLEMENT**

JUDGE: Hon. John W. Holcomb

DATE: January 10, 2025

TIME: 10:00 a.m.

COURTROOM: 9D – 9th Floor

1 I, George N. Bauer, hereby declare as follows:

2 1. I am a Partner with the law firm Bleichmar Fonti & Auld LLP (“BFA”),
3 counsel for Lead Plaintiff Jean-Pierre Murray (“Plaintiff”) and Lead Counsel for the
4 Class. I am an attorney duly licensed to practice in the State of New York and have
5 been admitted to practice *pro hac vice* in this matter. I have knowledge of the matters
6 stated herein and, should I be called upon, I could and would competently testify thereto.

7 2. I submit this declaration and the attached exhibits in support of Lead
8 Plaintiff’s Unopposed Motion for Preliminary Approval of Proposed Class Action
9 Settlement.

10 3. Attached hereto as **Exhibit 1** is a true and correct copy of the Stipulation
11 of Settlement (the “Stipulation”), including its exhibits, comprised of:

- 12 a. **Exhibit A** to the Stipulation is the Proposed Order Preliminarily
13 Approving Settlement and Providing for Class Notice;
- 14 b. **Exhibit A-1** to the Stipulation is the proposed Notice of Pendency
15 and Proposed Settlement of Class Action;
- 16 c. **Exhibit A-2** to the Stipulation is the proposed Long-Form Notice of
17 Pendency and Proposed Settlement of Class Action;
- 18 d. **Exhibit A-3** to the Stipulation is the proposed Proof of Claim and
19 Release Form;
- 20 e. **Exhibit A-4** to the Stipulation is the proposed Summary Notice; and
21 f. **Exhibit B** to the Stipulation is the proposed Final Judgment
22 Approving Settlement.

23 4. Attached hereto as **Exhibit 2** is the Declaration of Joseph Mahan in
24 Support of Lead Plaintiff’s Unopposed Motion for Preliminary Approval of Settlement.

25 5. Attached hereto as **Exhibit 3** is the Declaration of Chad Coffman, CFA,
26 Regarding Calculations of Artificial Inflation and Recognized Loss Amounts for the
27 Plan of Allocation.

28 6. Attached hereto as **Exhibit 4** is BFA’s Firm Resume.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed
2 on December 9, 2024 in White Plains, New York.

3 Dated: December 9, 2024 /s/ George N. Bauer
4 George N. Bauer
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CERTIFICATION

Pursuant to Civil Local Rule 5-4.3.4(a)(2), I hereby attest that concurrence in the
filing of this document has been obtained from the other signatory.

/s/ Joseph A. Fonti
Joseph A. Fonti