

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FADI DAHHAN, Individually and on Behalf of All Others Similarly Situated,)	No. 1:17-cv-10511-IT
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
OVASCIENCE, INC., et al.,)	
)	
Defendants.)	
)	
_____)	

**DECLARATION OF EDWARD FREEDMAN IN SUPPORT OF
MOTION FOR (1) FINAL SETTLEMENT APPROVAL, (2) AWARD OF ATTORNEYS'
FEES AND EXPENSES, AND (2) REIMBURSEMENT OF CLASS REPRESENTATIVE
TIME AND EXPENSES**

I, Edward Freedman, in accordance with 28 U.S.C. §1746, hereby declare as follows:

1. Freedman Family Investments LLC (“Lead Plaintiff” or “Freedman Family”) is the Court-appointed Lead Plaintiff and Class Representative in the above-captioned action (the “Action”). I submit this Declaration in support of the: (i) motion for final approval of settlement; (ii) motion for award of attorneys' fees and reimbursement of litigation expenses; and (iii) my request for the reimbursement of the reasonable costs incurred in connection with my involvement as Lead Plaintiff and Class Representative in the prosecution and resolution of the Action.

2. I have personal knowledge of the facts as set forth herein and, if called as a witness, I could and would competently testify thereto.

3. By Order dated July 5, 2017, Freedman Family was appointed Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”). By Order dated May 18, 2020, Freedman Family was appointed as a Class Representative in this Action.

4. During my involvement in the Action, I have dedicated a substantial amount of time monitoring the progress of the litigation and the efforts of Class Counsel on behalf of the Class. I believe I have faithfully performed my duties as Lead Plaintiff and Class Representative.

5. Specifically, in connection with this litigation, I: (i) located and produced all documents relevant to Freedman Family filing for appointment as Lead Plaintiff; (ii) located and produced all documents relevant to Freeman Family’s motion for class certification; (iii) reviewed Defendants' discovery requests upon me in this action and helped provide responses, including gathering relevant documents; (iv) reviewed filings made in this Action as were

provided by counsel, (v) read key Court orders and hearing transcripts; (vi) discussed litigation and case strategy with my attorneys; (vii) worked with counsel during the case investigation and initiation, and (ix) participated in settlement discussions and strategy with my attorneys, and remained available throughout the mediation process.

6. Throughout the course of the Action, my attorneys regularly kept me apprised of the status of the litigation through many in-person, written and/or telephonic communications and conversations.

7. With respect to the settlement process, I engaged in numerous discussions with my counsel concerning the pros and cons of settlement, and the strategies to be employed when negotiating. I also spent considerable time and effort deciding whether to approve the settlement that was ultimately reached in this matter.

8. I understand that the law allows for reimbursement of the time and expenses I incurred relating directly to my service as Lead Plaintiff and Class Representative and I am seeking reimbursement for the time and expenses I incurred relating directly to my service as Lead Plaintiff and Class Representative.

9. Since its inception five years ago in 2017, I have devoted significant time to this Action, as described in paragraph 5-7, above. Accordingly, I seek reimbursement in the amount of \$10,000 for total time spent in connection with my role as Lead Plaintiff and Class Representative.


10. Through my involvement as Lead Plaintiff and Class Representative, as well as my continuous discussions my counsel, I understand the strengths and weaknesses of the Action and am aware of the obstacles regarding summary judgment, proving loss causation,

and damages. My understanding of the facts and law in the Action enable me to strongly support presentation of the settlement to the Court for approval.

11. I strongly endorse the settlement, particularly given the risks of continuing to prosecute the claims in the Action and the extraordinary result achieved in this case. I also support Class Counsel's request for a fee of 33 1/3% for their outstanding work bringing this challenging matter to resolution, as well as reimbursement for their costs and litigation expenses. I also understand and appreciate that Class Counsel have kept expenses and claims administration reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20th day of June, 2022, in Malibu, California.


EDWARD FREEDMAN

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will, be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, if any, on June 21, 2022.

s/ Stephen R. Astley

STEPHEN R. ASTLEY