

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

Case No. 2:18-cv-04772 (JMV) (JBC)

**DECLARATION OF LUIGGY SEGURA REGARDING (A) MAILING OF
THE NOTICE AND POSTCARD NOTICE; (B) PUBLICATION OF THE
SUMMARY NOTICE; AND (C) REPORT ON REQUESTS FOR
EXCLUSION RECEIVED**

I, LUIGGY SEGURA, declare as follows:

1. I am a Vice President at JND Legal Administration (“JND”). Pursuant to the Court’s Order Approving the Form and Manner of Class Notice dated April 21, 2022 (ECF No. 199) (“Class Notice Order”), the Court approved the method for disseminating notice to the Class as set forth in the proposed notice plan (“Notice Plan”). The Notice Plan authorized Class Counsel to retain JND to supervise and administer the notice procedure in connection with the above-captioned action (“Action”).¹ I submit this Declaration in order to provide the Court and the Parties to the Action with information regarding the dissemination of the Notice of Pendency of Class Action (“Notice”), the Postcard Notice (“Postcard Notice”), and the publication of the Summary Notice of Pendency of Class Action (“Summary Notice”), as well as the establishment of the case website and dedicated toll-free telephone number, in

¹ All capitalized terms not defined in this Declaration have the meanings provided in the Class Notice Order.

accordance with the Class Notice Order. I also submit this Declaration to report on the requests for exclusion received. The following statements are based on my personal knowledge and information provided to me by other experienced JND employees, and, if called as a witness, I could and would testify competently thereto.

MAILING OF THE NOTICE AND POSTCARD NOTICE

2. Pursuant to the Court-approved Notice Plan, on May 11, 2022, JND disseminated the Notice by First-Class mail to the names and addresses of the brokerage firms, banks, institutions, and other third-party nominees (“Nominees”) contained in the proprietary database of Nominees maintained by JND (“JND’s Broker Database”). JND’s Broker Database contains the names and addresses of the most common Nominees. At the time of the May 11, 2022 mailing, JND’s Broker Database contained the names and addresses of 4,078 Nominees.

3. JND also researched Celgene Corporation’s filings with the U.S. Securities and Exchange Commission (“SEC”) on Form 13-F to identify additional institutions or entities who may have held Celgene Corporation common stock during the Class Period (i.e., the period between April 27, 2017 and April 27, 2018). As a result of this research, 2,098 address records were added to the list of names and addresses for mailing.

4. On May 11, 2022, JND mailed the Notice to the 6,176 names and addresses procured from Celgene Corporation's SEC filings and JND's Broker Database.

5. JND also caused the Notice to be posted on the Depository Trust Company Legal Notice System ("DTC LENS"). This service is made available to all Nominees who use the DTC. The DTC LENS is a place for legal notices to be posted pertaining to publicly traded companies. JND provided DTC LENS with the Notice for posting on May 11, 2022.

6. The Notice directed all those who purchased Celgene Corporation common stock between April 27, 2017 and April 27, 2018 for the beneficial interest of another person or entity to either: (i) within seven (7) calendar days of receipt of the Notice, request from JND sufficient copies of the Postcard Notice to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Postcard Notices forward them to all such beneficial owners; or (ii) within seven (7) calendar days of receipt of the Notice, provide a list of the names and addresses (and e-mail addresses, if available) of all such beneficial owners to JND and JND would send a copy of the Postcard Notice to the beneficial owners.²

² Receiving email addresses for notice mailings is not common practice in securities matters, but emails (if available) were requested by Class Counsel in light of the 2018 amendments to Federal Rule of Civil Procedure 23. In the event that both an e-mail address and mailing address were provided for the same potential Class Member, a Postcard Notice was mailed and a link to the Notice was emailed.

7. In a further attempt to garner Nominee responses, JND reached out by telephone to the top Nominees contained in JND's Broker Database and mailed reminder postcards to all of the Nominees in JND's Broker Database who had not responded to the May 11, 2022 mailing. The reminder postcard advised the Nominees of their obligation to provide notice to their clients.

8. Following the initial mailing, and pursuant to ¶ 2 of the Notice Plan, JND received the record holder file containing 419 names and addresses of holders of Celgene Corporation common stock during the Class Period. Prior to mailing the Postcard Notice to the persons and entities contained in the file received, JND verified the mailing records through the National Change of Address ("NCOA") database to ensure that the most current address was being used.

9. Additionally, JND received 309,042 unique names and addresses of potential Class Members from Nominees requesting that Postcard Notices be mailed to such persons or entities. JND has also received requests from Nominees for 442,059 Postcard Notices, in bulk, to be forwarded by the Nominees to their clients directly.

10. As of July 27, 2022, and as a result of the efforts described above, JND has mailed 751,520 Postcard Notices and 6,176 Notices to potential Class Members

JND received a total of 421 e-mail addresses during this administration.

and Nominees by First-Class mail.³ A copy of the Notice and Postcard Notice is attached hereto as Exhibit A.

PUBLICATION OF THE SUMMARY NOTICE

11. Pursuant to ¶ 7 of the Court-approved Notice Plan, the Summary Notice was to be published no later than ten (10) calendar days after the Notice Date. Accordingly, on May 17, 2022, JND caused the Summary Notice to be published once in *The Wall Street Journal* and to be transmitted once over *PR Newswire*. Attached hereto as Exhibit B is confirmation of the publications.

CALL CENTER SERVICES

12. Beginning on or about May 11, 2022, JND established and continues to maintain a toll-free telephone number (1-855-648-0893) for Class Members to call and obtain information about the litigation or request a Notice. JND has promptly responded to each telephone inquiry and will continue to address potential Class Members' inquiries via the toll-free telephone number.

³ As of July 27, 2022, 3,797 Postcard Notices and 90 Notices have been returned by the United States Postal Service ("USPS") to JND as undelivered as addressed. The USPS informed JND that 638 of the 3,887 undelivered Postcard Notices and Notices had an updated address and those were forwarded to the updated address. Where an updated address was not provided by the USPS, JND conducted an advanced search of the addresses on the undeliverable Postcard Notices and Notices. As a result, 1,227 new addresses were found and JND re-mailed the Postcard Notices and Notices to the updated addresses identified through the advanced address search.

13. The toll-free telephone number connects callers with an Interactive Voice Recording (“IVR”). The IVR provides callers with a series of choices to respond to basic questions. The toll-free telephone number with pre-recorded information is available 24 hours a day, 7 days a week, and provides callers with the option to speak with a live operator during regular business hours. During other hours, callers may leave a message for a JND representative to call them back. The toll-free telephone number is set forth in the Notice, Postcard Notice, Summary Notice, and Website addressed below.

14. As of July 27, 2022, there have been a total of 658 calls to the toll-free telephone number.

WEBSITE

15. To further assist potential Class Members, JND, in coordination with Class Counsel, designed, implemented, and currently maintains a website (www.CelgeneSecuritiesLitigation.com), dedicated to the litigation (“Website”). The Website became operational on May 11, 2022 and is accessible 24 hours a day, 7 days a week. Among other things, the Website includes general information regarding the litigation and provides access to downloadable copies of the Notice as well as other relevant documents (e.g., the operative complaint, the Court’s November 29, 2020 Order and Opinion, and the Class Notice Order). JND will continue to update the Website with relevant case updates.

16. As of July 27, 2022, the Website has received 6,056 unique visits.

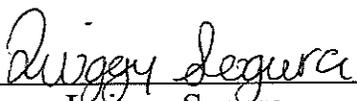
REPORT ON EXCLUSION REQUESTS RECEIVED

17. The Notice informed Class Members that requests for exclusion from the Class were to be addressed to *Celgene Corporation Securities Litigation, EXCLUSIONS*, c/o JND Legal Administration, P.O. Box 91422, Seattle, WA, 98111, and postmarked no later than July 11, 2022.

18. As of the date of this Declaration, JND has received thirty (30) requests for exclusion. All 30 requests for exclusion were received or postmarked on or before July 11, 2022. Attached hereto as Exhibit C is a list of those that submitted requests for exclusion.

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

Executed in New Hyde Park, New York, on July 28, 2022.



Luggo Segura

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

Case No. 2:18-cv-04772 (JMV) (JBC)

NOTICE OF PENDENCY OF CLASS ACTION

TO: All persons and entities who purchased the common stock of Celgene Corporation between April 27, 2017 and April 27, 2018, and were damaged thereby (the “Class”).

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

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOU MAY BE A MEMBER OF THE CLASS DESCRIBED HEREIN, AND YOUR RIGHTS MAY BE AFFECTED BY A PENDING CLASS ACTION LAWSUIT. THIS NOTICE ADVISES YOU OF YOUR OPTIONS REGARDING THE CLASS ACTION.

THIS CASE HAS NOT BEEN ADJUDICATED OR SETTLED. THIS NOTICE IS INTENDED ONLY TO INFORM YOU THAT A CLASS ACTION IS CURRENTLY IN PROGRESS. THERE IS NO CLAIM FORM TO BE MAILED.

PLEASE DO NOT CALL OR WRITE THE COURT. IF YOU HAVE ANY QUESTIONS AFTER READING THIS NOTICE, YOU SHOULD CONTACT CLASS COUNSEL OR THE ADMINISTRATOR, AS DISCUSSED FURTHER BELOW.

This Notice is being issued pursuant to Federal Rule of Civil Procedure (“Rule”) 23 and an Order of the United States District Court for the District of New Jersey (“Court”) to inform you: (i) of a class action lawsuit that is now pending in the Court under the above caption (“Action”) against Celgene Corporation (“Celgene”), Scott A. Smith, Terrie Curran, and Philippe Martin (collectively, “Defendants”); and (ii) that the Action has been certified by the Court to proceed as a class action on behalf of the Class, as defined in ¶ 1 below.

1. By Order entered November 30, 2020, the Court certified the Action as a class action on behalf of the following Class:

All persons and entities who purchased the common stock of Celgene between April 27, 2017 and April 27, 2018, and were damaged thereby.

Excluded from the Class are: (i) Celgene; (ii) any directors and officers of Celgene during the Class Period and members of their immediate families; (iii) the subsidiaries, parents and affiliates of Celgene; (iv) any firm, trust, corporation or other entity in which Celgene has or had a controlling interest; and (v) the legal representatives, heirs, successors and assigns of any such excluded party.

2. This Notice is directed to members of the Class. If you are a member of the Class, your rights will be affected by the Action. If you do not meet the Class definition, this Notice does

Questions? Visit www.CelgeneSecuritiesLitigation.com, email info@CelgeneSecuritiesLitigation.com, or call (855) 648-0893 for more information.

not apply to you. If you are uncertain whether you are a member of the Class, please contact Class Counsel listed in ¶ 24 below, or your own attorney.

3. This Notice is not an admission by Defendants or an expression of any opinion by the Court as to the merits of the Action, or a finding by the Court that the claims asserted by Class Representative¹ in the Action are valid. This Notice is intended solely to inform you of the pendency of the Action and of your rights concerning the Action, including the right to request exclusion from the Class if you are a member of the Class. **There is no judgment, settlement, or monetary recovery at this time**, and there is no assurance that a judgment in favor of the Class will be granted or that the Court will award the Class a monetary recovery. Defendants have denied Class Representative’s claims, and contend that they are not liable for the harm alleged by Class Representative.

4. The Class definition may be subject to change by the Court pursuant to Rule 23.

DESCRIPTION AND STATUS OF THE LAWSUIT

5. This is a securities class action against Defendants for alleged violations of the federal securities laws during the Class Period. Class Representative alleges that Defendants made material misrepresentations and omissions during the Class Period regarding Celgene’s business, operations, and prospects. More specifically, Class Representative alleges that Defendants made misrepresentations and omissions regarding two drugs that Defendants touted as sources of revenue to fill the void that would be left by Celgene’s flagship drug, Revlimid, when its patent expired in 2022 – Ozanimod and Otezla. This Action alleges that Defendants made statements that misrepresented and failed to disclose material facts regarding Celgene’s development of the multiple sclerosis drug Ozanimod and that Celgene was on track to submit a “new drug application” regarding Ozanimod to the U.S. Food and Drug Administration (“FDA”) pursuant to the company’s timeline. This Action also alleges that Defendants failed to disclose the existence of substantial impediments to the expansion of the market for Otezla, a drug used to treat psoriasis and psoriatic arthritis. Defendants deny the allegations of wrongdoing asserted in the Action, and deny any liability whatsoever to any member of the Class. **Please note that this Notice does not describe all claims and defenses asserted by the parties. The section entitled “Where You Can Find Additional Information” describes the process by which you can obtain additional information about this Action, including the claims and defenses asserted.**

6. On March 29, 2018, the initial complaint was filed in the Court against Celgene and certain of Celgene’s officers, asserting violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78j(b) and 78t(a) (“Exchange Act”), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5.

7. On September 26, 2018, the Court appointed AMF Pensionsförsäkring AB as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) and appointed Lead Plaintiff’s selection of counsel – Kessler Topaz Meltzer & Check, LLP as lead counsel and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. and Seeger Weiss, LLP as liaison counsel.

¹ The Court has appointed AMF Pensionsförsäkring AB as the representative for the Class.

Questions? Visit www.CelgeneSecuritiesLitigation.com, email info@CelgeneSecuritiesLitigation.com, or call (855) 648-0893 for more information.

8. On December 10, 2018, Lead Plaintiff filed the Amended Consolidated Class Action Complaint (“Amended Complaint”) against Celgene, Mark J. Alles, Scott A. Smith, Peter N. Kellogg, Terrie Curran, Jacquelyn A. Fouse, Philippe Martin, Nadim Ahmed, Jonathan Q. Tran, Robert J. Hugin, and Peter Callegari, M.D. Like the initial complaint, the Amended Complaint asserted violations of Sections 10(b) and 20(a) of the Exchange Act, 15 U.S.C. §§ 78j(b) and 78t(a), and Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5. Defendants moved to dismiss the Amended Complaint on February 8, 2019.

9. Pursuant to Stipulation and Order of the Court, Lead Plaintiff was permitted to amend the Amended Complaint to remove a single allegation. On February 27, 2019, Lead Plaintiff filed the Second Amended Consolidated Class Action Complaint (“Second Amended Complaint”).

10. On April 9, 2019, Lead Plaintiff opposed Defendants’ motion to dismiss and, on May 9, 2019, Defendants filed a reply in support of their motion to dismiss. By Order dated December 19, 2019, the Court granted in part and denied in part Defendants’ motion to dismiss (“MTD Ruling”). The MTD Ruling dismissed: (i) Lead Plaintiff’s allegations as to a drug referred to as GED-0301; (ii) a number of alleged misstatements concerning Otezla and Ozanimod; (iii) Lead Plaintiff’s Section 10(b) and Rule 10b-5 claims against Mark J. Alles, Peter N. Kellogg, Nadim Ahmed, Peter Callegari, M.D., Jonathan Q. Tran, Jacquelyn A. Fouse, and Robert J. Hugin; and (iv) Lead Plaintiff’s Section 20(a) claims.

11. On March 5, 2020, Defendants filed their Answer to the Second Amended Complaint, denying all claims and wrongdoing asserted, as well as any liability arising out of the conduct alleged in the Second Amended Complaint. The Defendants also asserted several affirmative defenses to the claims made in the Second Amended Complaint. Thereafter, the parties pursued discovery concerning their respective claims and defenses.

12. On May 1, 2020, Lead Plaintiff filed a motion for class certification. Defendants opposed Lead Plaintiff’s motion on June 25, 2020, and Lead Plaintiff filed a reply in further support of its motion on July 31, 2020. By Order and Opinion entered on November 30, 2020 (together, the “Class Certification Order”), the Court granted Lead Plaintiff’s motion, certifying a Class consisting of all persons and entities who purchased the common stock of Celgene between April 27, 2017 and April 27, 2018, and were damaged thereby. Excluded from the Class are: (i) Celgene; (ii) any directors and officers of Celgene during the Class Period and members of their immediate families; (iii) the subsidiaries, parents and affiliates of Celgene; (iv) any firm, trust, corporation or other entity in which Celgene has or had a controlling interest; and (v) the legal representatives, heirs, successors and assigns of any such excluded party. In addition, the Class Certification Order appointed Lead Plaintiff as Class Representative and appointed Kessler Topaz Meltzer & Check, LLP as Class Counsel and Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. and Seeger Weiss, LLP as Co-Liaison Counsel for the Class.

13. On December 14, 2020, Defendants filed a petition with the Third Circuit Court of Appeals for permission to appeal the Class Certification Order. The Third Circuit denied without prejudice Defendants’ petition on March 2, 2021.

14. On July 9, 2021, Class Representative filed a Motion for Leave to Amend the Second Amended Complaint. ECF No. 135. On February 24, 2022, Magistrate Judge James B. Clark, III granted the Motion for Leave to Amend the Second Amended Complaint. ECF No. 173. Class Representative then filed the Third Amended Consolidated Class Action Complaint on

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March 1, 2022. ECF No. 175. On March 9, 2022, Defendants appealed Magistrate Judge Clark's decision granting the Motion for Leave to Amend the Second Amended Complaint to the District Court. ECF No. 180. On August 30, 2021, Defendants filed a Motion to Modify the Class Period in Light of the Supreme Court's Recent Decision in *Goldman Sachs Group Inc. v. Arkansas Teacher Retirement System*. ECF No. 151. On April 13, 2022, the Court denied Defendants' Motion to Modify the Class Period. ECF No. 198.

15. The Action is ongoing. The parties completed fact discovery on June 20, 2021. A trial date has not yet been set.

16. No court has made a ruling on the merits of Class Representative's allegations or on Defendants' denials and defenses.

YOUR RIGHTS AS A CLASS MEMBER

17. A class action is a type of lawsuit in which one or several individuals or entities prosecute claims on behalf of all members of a group of similarly situated persons and entities to obtain monetary or other relief for the benefit of the entire group. Class actions avoid the necessity of each member of a class having to file his, her, or its own separate lawsuit to obtain relief. Class actions are used to decide legal and factual issues that are common to all members of a class.

18. If you purchased the common stock of Celgene between April 27, 2017 and April 27, 2018, and were damaged thereby, and you are not excluded by definition from the Class, then you are a member of the Class. If you are a member of the Class, you have the right to decide whether to remain a member of the Class. ***If you are a member of the Class and wish to be excluded from the Class, you must request exclusion in accordance with the procedures set forth in ¶ 20 below. If you want to remain a member of the Class, you do not need to do anything at this time other than to retain your documentation reflecting your transactions and holdings in Celgene common stock during the Class Period as discussed below in ¶ 19.*** Your decision is important for the following reasons:

- a. **If you choose to remain a member of the Class**, you will be bound by all past, present, and future orders and judgments in the Action, whether favorable or unfavorable. If any money is awarded to the Class, either through a settlement with Defendants or a judgment of the Court after a trial and appeal, you may be eligible to receive a share of that award. However, if you remain a member of the Class, you may not pursue a lawsuit on your own behalf with regard to any of the issues in the Action in connection with your purchase of Celgene common stock. Pursuant to Rule 23(e)(4), it is within the Court's discretion whether to allow a second opportunity to request exclusion from the Class if there is a settlement. Please note that if you remain a member of the Class, you will not be personally responsible for Class Counsel's attorneys' fees or costs. Class Counsel has agreed to represent the Class on a contingent fee basis, which means that it will be awarded fees and costs, as approved by the Court, only if it succeeds in obtaining a recovery from one or more Defendants. Any attorneys' fees and costs for Class Counsel will be awarded by the Court from the settlement or judgment, if any, obtained on behalf of the Class. As a member of the Class, you will be represented by Class Counsel. Alternatively, you may remain a member of the Class and elect to be represented

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by counsel of your own choosing. If you do retain separate counsel, you will be responsible for that attorney's fees and expenses and that attorney must enter an appearance on your behalf by filing a Notice of Appearance with the Court and mailing it to Class Counsel at the address set forth in ¶ 24 below on or before **July 11, 2022**.

- b. **If you choose to be excluded from the Class**, you will not be bound by any orders or judgments in this Action, nor will you be eligible to share in any recovery that might be obtained in this Action. You will retain any right you have to individually pursue any legal rights that you may have against any Defendants with respect to the claims asserted in the Action and Defendants retain all their defenses to your claims. ***Please note, if you decide to exclude yourself from the Class, you may be time-barred from asserting all or a portion of the claims covered by the Action. Class Counsel offers no advice and no opinion on whether you will be able to maintain such claims.*** Please refer to ¶¶ 20-23 below if you would like to request exclusion from the Class.

19. Members of the Class will be eligible to participate in any recovery that might be obtained in the Action. While this Notice is not intended to suggest any likelihood that Class Representative or members of the Class will obtain any recovery, should there be a recovery, members of the Class will be required to support their requests to participate in the distribution of the recovery by demonstrating their membership in the Class and documenting their purchases and sales of Celgene common stock during the Class Period. ***For this reason, please be sure to keep all records of your transactions and holdings in Celgene common stock. DO NOT mail them to Class Counsel or the Administrator at this time.***

HOW TO BE EXCLUDED FROM THE CLASS

20. To exclude yourself from the Class, you must send a letter by first-class mail stating that you “request exclusion from the Class in *In re Celgene Corporation Securities Litigation*, Case No. 2:18-cv-04772-JMV-JBC.” Your request must state your full name, address, telephone number, and you must sign it. 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 to act on behalf of the Class member. Your request for exclusion must also state the amount of Celgene common stock purchased and sold during the Class Period, as well as the dates and prices of each such purchase and sale. You must mail your exclusion request, ***postmarked no later than July 11, 2022***, to:

***Celgene Corporation Securities Litigation
Exclusions
c/o JND Legal Administration
P.O. Box 91422
Seattle, WA 98111***

21. You cannot exclude yourself from the Class by telephone, facsimile, or e-mail. Requests for exclusion that do not comply with the above requirements will be invalid, unless otherwise accepted by the Court, subject to any objections of the parties to be resolved by the Court.

Questions? Visit www.CelgeneSecuritiesLitigation.com, email info@CelgeneSecuritiesLitigation.com, or call (855) 648-0893 for more information.

22. Do not request exclusion if you wish to participate in the Action as a member of the Class.

23. If you properly request exclusion from the Class, you will not be bound by any orders or judgments in the Action, but you also will not be eligible to share in any recovery that might be obtained in the Action. If you properly request exclusion from the Class, you may be entitled to pursue an individual lawsuit, claim, or remedy, if available, which you may have, at your own expense. **Please note:** if you decide to exclude yourself from the Class, you may be time-barred from asserting all or a portion of the claims covered by the Action. Class Counsel offers no advice and no opinion on whether you will be able to maintain such claims.

CLASS COUNSEL

24. The Court appointed the law firm Kessler Topaz Meltzer & Check, LLP as Class Counsel. If you have any questions concerning the matters raised in this Notice, you may contact Class Counsel, as follows:

KESSLER TOPAZ MELTZER
& CHECK, LLP
Andrew L. Zivitz, Esq.
Matthew L. Mustokoff, Esq.
280 King of Prussia Road
Radnor, PA 19087

Telephone: (610) 667-7706
info@ktmc.com
www.ktmc.com

25. As noted above, unless you elect to retain your own personal lawyer, if you remain in the Class, you will not have any direct obligation to pay the costs of the litigation. If there is a recovery by the Class in the Action, all costs and expenses of the Action, including Class Counsel's attorneys' fees, will be paid from that recovery in an amount approved by the Court.

26. If you want to be represented by your own lawyer, you may hire one at your own expense. If you do retain your own lawyer, such counsel must enter an appearance on your behalf by filing a Notice of Appearance with the Clerk of the Court at the United States District Court for the District of New Jersey, located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, 07101, **on or before July 11, 2022**. Your Notice of Appearance must also be mailed to Class Counsel at the address set forth in ¶ 24 above, **on or before July 11, 2022**.

PLEASE KEEP YOUR ADDRESS CURRENT

27. To assist the Court and the parties in maintaining accurate lists of Class members, you are requested to mail notice of any changes in your address to:

Celgene Corporation Securities Litigation
c/o JND Legal Administration
P.O. Box 91422
Seattle, WA 98111

Questions? Visit www.CelgeneSecuritiesLitigation.com, email info@CelgeneSecuritiesLitigation.com, or call (855) 648-0893 for more information.

28. If you receive a Postcard Notice relating to the Action by mail and that Postcard Notice was forwarded to you by the postal service, or if it was otherwise sent to you at an address that is not current, you should immediately contact the Administrator, JND Legal Administration, at the address above, by email at info@CelgeneSecuritiesLitigation.com, or by toll-free phone at (855) 648-0893 and provide them with your correct address. If the Administrator does not have your correct address, you may not receive notice of important developments in the Action.

WHERE YOU CAN FIND ADDITIONAL INFORMATION

29. This Notice gives only a summary of the lawsuit and the claims asserted by Class Representative. For more detailed information regarding the Action, you may contact Class Counsel or visit www.CelgeneSecuritiesLitigation.com. You may also contact the Administrator by email at info@CelgeneSecuritiesLitigation.com, or by toll-free phone at (855) 648-0893.

30. Complete copies of the pleadings, orders, and other documents filed in this Action are available at <http://www.pacer.gov> or at the office of the Clerk of the Court, United States District Court for the District of New Jersey, located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, under Case No. 2:18-cv-04772-JMV-JBC.

**PLEASE DO NOT CALL OR WRITE THE COURT OR CLERK OF THE COURT
REGARDING THIS NOTICE.**

NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

31. If, for the beneficial interest of any person or entity other than yourself, you purchased Celgene common stock between April 27, 2017 and April 27, 2018, you MUST EITHER: (i) WITHIN SEVEN (7) CALENDAR DAYS of receipt of this Notice, request from the Administrator sufficient copies of the Postcard Notice to forward to all such beneficial owners and WITHIN SEVEN (7) CALENDAR DAYS of receipt of those Postcard Notices forward them to all such beneficial owners; or (ii) WITHIN SEVEN (7) CALENDAR DAYS of receipt of this Notice, provide a list of the names and addresses (and e-mail addresses, if available) of all such beneficial owners to the Administrator at *Celgene Corporation Securities Litigation, c/o JND Legal Administration, P.O. Box 91422, Seattle, WA 98111*. If you choose the first option, YOU MUST send a statement to the Administrator confirming that the mailing was made and YOU MUST retain your mailing records for use in connection with any further notices that may be provided in the Action. If you choose the second option, the Administrator will send a copy of the Postcard Notice to the beneficial owners. Upon FULL AND TIMELY compliance with these directions, such nominees may seek reimbursement of their reasonable expenses actually incurred by providing the Administrator with proper documentation supporting the expenses for which reimbursement is sought.

DATED: May 11, 2022

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Questions? Visit www.CelgeneSecuritiesLitigation.com, email info@CelgeneSecuritiesLitigation.com, or call (855) 648-0893 for more information.

Court-Ordered Legal Notice

*This Notice may affect your legal rights.
Please read it carefully.*

Important Legal Notice Authorized by the United States District Court, District of New Jersey about a Class Action

If you purchased the common stock of Celgene Corporation between April 27, 2017 and April 27, 2018, and were damaged thereby, a class action has been certified that will impact your legal rights.

*In re Celgene Corporation Securities Litigation,
Case No. 2:18-cv-04772-JMV-JBC (D.N.J.)*

*THIS POSTCARD ONLY PROVIDES LIMITED
INFORMATION ABOUT THE CLASS ACTION.*

Please visit www.CelgeneSecuritiesLitigation.com,
email info@CelgeneSecuritiesLitigation.com,
or call (855) 648-0893 for more information.

Celgene Corporation Securities Litigation
c/o JND Legal Administration
P.O. Box 91422
Seattle, WA 98111

Postal Service: Please Do Not Mark or Cover Barcode

The Court has certified a class in a class action (the "Action") that is pending against Celgene Corporation ("Celgene"), Scott A. Smith, Terri Curran, and Philippe Martin (collectively, "Defendants"). IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THIS CASE, WHICH HAS NOT SETTLED. This notice advises you of basic information about your options. A more detailed "long-form notice" is available on the case website, www.CelgeneSecuritiesLitigation.com, or by calling (855) 648-0893.

What Has Happened So Far? This case began in March 2018 and asserts claims under Section 10(b) of the Securities Exchange Act of 1934 and SEC Rule 10b-5. The Action alleges that Defendants made material misrepresentations and omissions during the Class Period regarding Celgene's business, operations, and prospects. More specifically, the Action alleges that Defendants made misrepresentations and omissions regarding two drugs (Ozanimod and Otezla) that Defendants touted as sources of revenue to fill the void that would be left by Celgene's flagship drug, Revlimid, when its patent expired in 2022. Defendants deny the claims and wrongdoing asserted, as well as any liability arising out of the conduct alleged, and Defendants have asserted several affirmative defenses to the claims. In November 2020, the Court certified the Class and appointed Class Representative and Class Counsel (Kessler Topaz Meltzer & Check, LLP, 280 King of Prussia Road, Radnor, PA 19087). The Action is ongoing and in the discovery phase, and no trial date has been set. **A detailed description of the Action and the claims asserted is contained in the long-form notice available on the case website.**

Who Is In The Class? All persons and entities who purchased the common stock of Celgene between April 27, 2017 and April 27, 2018 ("Class Period"), and were damaged thereby. As is explained in the long-form notice, certain persons and entities (including Defendants, the directors and officers of Celgene during the Class Period, and the individual Defendants' immediate family members) are excluded from the Class by definition.

What Are My Options? This Action is being litigated and no money has been recovered. If you do nothing, you will remain a member of the Class and if there is a **future** recovery or settlement, you may be eligible for a payment. If you remain a Class member, you will be bound by all Court orders, whether favorable or unfavorable, and you may not pursue a lawsuit on your behalf with regard to any issues in the Action.

If you DO NOT want to be a Class member and be legally bound by anything that happens in the Action, **you must exclude yourself** from the Class. To exclude yourself, you must send a letter by first-class mail stating that you "request exclusion from the Class in *In re Celgene Corporation Securities Litigation*, Case No. 2:18-cv-04772-JMV-JBC." Your request must: (i) state the full name, address, and telephone number of the person or entity requesting exclusion, and be signed; and (ii) state the amount of Celgene common stock purchased and/or sold during the Class Period by the person or entity requesting exclusion, as well as the dates and prices of each such purchase and/or sale. You must mail your exclusion request, **postmarked by no later than July 11, 2022**, to: *Celgene Corporation Securities Litigation*, Exclusions, c/o JND Legal Administration, P.O. Box 91422, Seattle, WA 98111. Defendants retain all of their defenses to individual claims and may seek their dismissal, including because claims may be time-barred.

Your Other Rights. Class members are represented by Class Counsel. You will not be personally responsible for their fees and expenses. You may also hire your own attorney, at your own expense. If you do, your attorney must file a notice of appearance with the Court **on or before July 11, 2022**.

PLEASE KEEP YOUR INVESTMENT RECORDS AND NOTIFY THE ADMINISTRATOR OF ANY CHANGE IN ADDRESS.

Do not contact the Court, Defendants, or their counsel. All question should be directed to the Administrator or Class Counsel, or visit the case website.

EXHIBIT B

Kessler Topaz Meltzer & Check, LLP Announces Pendency of Class Action on Behalf of Purchasers of Celgene Corporation Common Stock

NEWS PROVIDED BY

JND Legal Administration →

May 17, 2022, 09:17 ET

SEATTLE, May 17, 2022 /PRNewswire/ --

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

Case No. 2:18-cv-04772 (JMV) (JBC)

SUMMARY NOTICE OF PENDENCY OF CLASS ACTION

THIS NOTICE AFFECTS all persons and entities who purchased the common stock of Celgene Corporation ("Celgene") between April 27, 2017 and April 27, 2018, and were damaged thereby (the "Class"). Excluded from the Class are: (i) Celgene; (ii) any directors and officers of Celgene during the Class Period and members of their immediate families; (iii) the subsidiaries, parents and affiliates of Celgene; (iv) any firm, trust, corporation or other entity in which Celgene has or had a controlling interest; and (v) the legal representatives, heirs, successors and assigns of any such excluded party.

YOU ARE HEREBY NOTIFIED, pursuant to Federal Rule of Civil Procedure ("Rule") 23 and by Order of the United States District Court for the District of New Jersey, that the above-captioned action ("Action") against Celgene, Scott A. Smith, Terrie Curran, and Philippe Martin (collectively, "Defendants"), has been certified as a class action on behalf of the Class. The Court has appointed AMF Pensionsförsäkring AB ("Class Representative") to represent the Class. The Action has not been adjudicated or settled. This notice is not an admission by Defendants or an expression of any opinion by the Court as to the merits of the Action, or a finding by the Court that the claims asserted by Class Representative in the Action are valid. This notice is intended only to inform members of the Class that the Action is currently in progress.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THE LAWSUIT. This notice provides only a summary of the information contained in the detailed, long-form Notice of Pendency of Class Action ("Notice"). You may obtain a copy of the Notice from the website for the Action, www.CelgeneSecuritiesLitigation.com, or by contacting the Administrator:

Celgene Corporation Securities Litigation

c/o JND Legal Administration

P.O. Box 91422

Seattle, WA 98111

(855) 648-0893

info@CelgeneSecuritiesLitigation.com

If you are a Class member you should receive a Postcard Notice regarding the Action by mail. If you are a Class member and you do not receive a Postcard Notice by mail, please send your name and address to the Administrator so that you will receive any future notices disseminated in connection with the Action.

Inquiries, other than requests for the Notice, may be made to Court-appointed Class Counsel:

KESSLER TOPAZ MELTZER

& CHECK, LLP

Andrew L. Zivitz, Esq.

Matthew L. Mustokoff, Esq.

280 King of Prussia Road

Radnor, PA 19087

Telephone: (610) 667-7706

info@ktmc.com

www.ktmc.com

If you are a Class member, you have the right to decide whether to remain a member of the Class. ***If you choose to remain a member of the Class, you do not need to do anything at this time other than retain your documentation reflecting your transactions and holdings in Celgene common stock.*** You will automatically be included in the Class, and you will be bound by the proceedings in the Action, including all past, present, and future orders and judgments of the Court, whether favorable or unfavorable. If you are a Class member and **do not** wish to remain a member of the Class, you **must** take steps to exclude yourself from the Class.

If you timely and validly request to be excluded from the Class, you will not be bound by any orders or judgments in the Action, and you will not be eligible to receive a share of any money which might be recovered in the future for the benefit of the Class. To exclude yourself from the Class, you must submit a written request for exclusion **postmarked no later than July 11, 2022**, in accordance with the instructions set forth in the Notice. Pursuant to Rule 23(e)(4), the Court has discretion as to whether a second opportunity to request exclusion from the Class will be allowed if there is a settlement in the Action. ☞

Further information may be obtained by contacting the Administrator at Info@CelgeneSecuritiesLitigation.com, or (855) 648-0893, or by visiting the website www.CelgeneSecuritiesLitigation.com.

Please do not call or write the Court with questions.

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SOURCE JND Legal Administration

BIGGEST 1,000 STOCKS

How to Read the Stock Tables

The following explanations apply to NYSE, NYSE Arca, NYSE American and Nasdaq Stock Market listed securities. Prices are composite quotations that include primary market trades as well as trades reported by Nasdaq BX (formerly Boston), Chicago Stock Exchange, Cboe, NYSE National and Nasdaq ISE.

Footnotes:

1-New 52-week high. 2-New 52-week low. 3-Indicates loss in the most recent four quarters. 4-Indicates loss in the most recent quarter. 5-Does not meet continued listing standards. 6-Late filing. 7-Temporary exemption from Nasdaq requirements. 8-NYSE bankruptcy. 9-Trading halted on primary market. 10-In bankruptcy or receivership or being reorganized under the Bankruptcy Code, or securities assumed by such companies.

Table of stock data with columns: Stock, Sym, Close, Net Chg, Stock, Sym, Close, Net Chg. Includes stocks like Coca-Cola, Equitable, Highwoods, Liberty, etc.

Wall Street Journal stock tables reflect composite regular trading as of 4 p.m. and changes in the closing prices from 4 p.m. the previous day.

Monday, May 16, 2022. Table of stock data with columns: Stock, Sym, Close, Net Chg, Stock, Sym, Close, Net Chg, Stock, Sym, Close, Net Chg, Stock, Sym, Close, Net Chg. Includes stocks like ABB, AECOM, AES, etc.

Table of stock data with columns: Stock, Sym, Close, Net Chg, Stock, Sym, Close, Net Chg. Includes stocks like DCP, DISH, DTE, etc.

Table of stock data with columns: Stock, Sym, Close, Net Chg, Stock, Sym, Close, Net Chg. Includes stocks like M&T Bank, MRC, etc.

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AUCTIONS. CALL FOR INTERNATIONAL PUBLIC BIDDING. Procedure Reference: FIDEICOMISO-CCC-LPI-2022-0001. Trust for the Operation, Maintenance and Expansion of the Main Road Network of the Dominican Republic (FIDEICOMISO RD-VIAL).

LEGAL NOTICE. UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY. IN RE CELGENE CORPORATION SECURITIES LITIGATION. SUMMARY NOTICE OF PENDENCY OF CLASS ACTION.

COMMERCIAL REAL ESTATE. FLORIDA INVESTOR ALERT. (5) Home Package - Leased Near St Aug, \$1.7M. Floor Biz - Palm Coast, Biz & Property \$1.75M.

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EXHIBIT C

EXCLUSION REQUESTS

<p>1. Jeannette Mondou Voisins le Bretonneux France</p> <p>2. Nicholas E. Smaby & Sofie Grace Boyer Michigan</p> <p>3. Leonard DeStefano & Eileen DeStefano Drexel Hill, PA</p> <p>4. Aline H. Rolaff Revocable Trust UAD 11/30/1995 First Hawaiian Bank (Trustee) Honolulu, HI</p> <p>5. Maryanne T. Harris Mashpee, MA</p> <p>6. Jeffrey A. Hays Edmond, OK</p> <p>7. Margaret L. Rodeghero TTEE Margaret L. Rodeghero Trust UA DTD 07112019 Richmond, IN</p> <p>8. Makio Hayakawa Tokyo Japan</p> <p>9. Edna R. Shuey Edna R. Shuey TTEE U/A DTD 01/19/2005 Las Vegas, NV</p> <p>10. Edwin J. Allen North Chili, NY</p>	<p>11. Michele A. Braatz San Deigo, CA</p> <p>12. Wim Bosch & Nancy Bosch Avilla, IN</p> <p>13. Lois J. Hopf Jasper, IN</p> <p>14. Kencarolla Self-Managed Superannuation Fund Kenneth William Berndt & Carol-Ann Berndt (Trustees) Queensland Australia</p> <p>15. Entreprises Fiscali Taxe R.L. Inc. C/O Robert Gagnon Quebec Canada</p> <p>16. Nordea Bank S.A. (in liquidation) C/O KPMG Luxembourg S.A. Luxembourg City Luxembourg</p> <p>17. Deborah Jane Novakowski Parrish, FL</p> <p>18. William L. Chan Dunellen, NJ</p> <p>19. Carol Susan Petrick Dubuque, IA</p> <p>20. Ruby G. Theilmann British Columbia, Canada</p> <p>21. Arturo McKeon & Graciela Enriqueta Fallo Buenos Aires Argentina</p>
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EXCLUSION REQUESTS

<p>22. Schwab Capital Trust on behalf of its series Schwab Total Stock Market Index Fund, Schwab Health Care Fund, Schwab Dividend Equity Fund, Schwab Large-Cap Growth Fund, Schwab S&P 500 Index Fund, Schwab Core Equity Fund, Schwab Hedged Equity Fund, Schwab U.S. Large-Cap Growth Index Fund, and Schwab Fundamental US Large Company Index Fund; Schwab Strategic Trust on behalf of its series Schwab Fundamental U.S. Large Company Index ETF, Schwab Fundamental U.S. Broad Market Index ETF, Schwab U.S. Broad Market ETF, Schwab U.S. Large-Cap ETF, Schwab U.S. Large-Cap Growth ETF, and Schwab 1000 Index ETF; Schwab Annuity Portfolios on behalf of its series Schwab S&P 500 Index Portfolio; and Laudus Trust on behalf of its series Landus U.S. Large Cap Growth Fund C/O Daniel L. Berger Grant & Eisenhofer P.A. Kansas City, MO</p> <p>23. California Public Employees' Retirement System C/O Daniel L. Berger Grant & Eisenhofer P.A. Sacramento, CA</p> <p>24. GIC Private Limited Singapore C/O Daniel L. Berger Grant & Eisenhofer P.A.</p>	<p>25. Thomas S. Ogata & Jean H. Ogata (Trustees) JWM Revocable Living Trust Plano, TX</p> <p>26. DFA Investment Dimensions Group Inc. ("DFAIDG"), on behalf of its series, U.S. Core Equity 1 Portfolio, U.S. Core Equity 2 Portfolio, U.S. Sustainability Core 1 Portfolio, U.S. Large Cap Equity Portfolio, U.S. Large Cap Growth Portfolio, and U.S. High Relative Profitability Portfolio; Dimensional ETF Trust, on behalf of its series, Dimensional U.S. Equity ETF and Dimensional U.S. Core Equity 2 ETF; Dimensional Investment Group Inc. ("DIG"), on behalf of its series, U.S. Large Company Portfolio; Dimensional Funds pic, on behalf of its sub-funds Global Core Equity Fund, Global Sustainability Core Equity Fund, World Equity Fund, and U.S. Core Equity Fund; Dimensional Global Core Equity Trust and Dimensional Global Sustainability Trust (the "Dimensional Australian Trusts"), by DFA Australia Limited ("DFA Australia") solely in its capacity as single responsible entity; and DFA U.S. Core Equity Fund, by Dimensional Fund Advisors Canada ULC ("DFAC") solely in its capacity as Trustee C/O Daniel L. Berger Grant & Eisenhofer P.A. Austin, TX</p>
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EXCLUSION REQUESTS

<p>27. American Century Mutual Funds, Inc., solely on behalf of its series Select Fund, Ultra Fund, Growth Fund (solely as successor-in-interest to All Cap Growth Fund, a series of American Century Mutual Funds, Inc.), Balanced Fund, and Sustainable Equity Fund; American Century Variable Portfolios, Inc., solely on behalf of its series VP Balanced Fund, VP Disciplined Core Value Fund, VP Ultra Fund, and VP Large Company Value Fund; American Century Capital Portfolios, Inc., solely on behalf of its series Value Fund (solely as successor-in-interest to Capital Value Fund, a series of American Century Mutual Funds, Inc.), NT Focused Large Cap Value Fund, and Focused Large Cap Value Fund; American Century Strategic Asset Allocations, Inc., solely on behalf of its series Strategic Allocation: Conservative Fund, Strategic Allocation: Moderate Fund, and Strategic Allocation: Aggressive Fund; American Century Growth Funds, Inc., solely on behalf of its series Focused Dynamic Growth Fund; Nomura Funds Ireland pic, solely on behalf of its sub-funds American Century Global Growth Equity Fund and American Century Concentrated Global Growth Equity Fund;</p>	<p>28. Kensuke Koda Tokyo Japan</p> <p>29. John Peter Welch New South Wales Australia</p> <p>30. Roger James Calvert Heale Christchurch New Zealand</p>
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EXCLUSION REQUESTS

<p>Nomura Institutional Fund Select, solely on behalf of its sub-fund Nomura Institutional Fund Select – American Century Global Growth Fund; Nomura Currency Fund, solely on behalf of its sub-fund Nomura Currency Fund - US Growth Equity Fund; and American Century Quantitative Equity Funds, Inc., solely on behalf of its series AC Alternatives Equity Market Neutral Fund, Disciplined Growth Fund, NT Equity Growth Fund, NT Core Equity Plus Fund, NT Disciplined Growth Fund, Equity Growth Fund, Core Equity Plus Fund, and Disciplined Core Value Fund</p> <p>C/O Daniel L. Berger Grant & Eisenhofer P.A. Kansas City, MO</p>	
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