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

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

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

**REPLY MEMORANDUM OF LAW
IN FURTHER SUPPORT OF (I)
PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF SETTLEMENT
AND PLAN OF ALLOCATION;
AND (II) CLASS COUNSEL'S
MOTION FOR ATTORNEYS' FEES
AND LITIGATION EXPENSES**

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Court-appointed Lead Plaintiff and Class Representative AMF Tjänstepension AB (“Plaintiff”),¹ on behalf of itself and the Court-certified Class, and Class Counsel respectfully submit this reply memorandum in further support of: (i) Plaintiff’s Motion for Final Approval of Settlement and Plan of Allocation (ECF 494); and (ii) Class Counsel’s Motion for Attorneys’ Fees and Litigation Expenses (ECF 495) (together, the “Motions”).

I. PRELIMINARY STATEMENT

As detailed in Plaintiff’s and Class Counsel’s opening papers in support of the Motions (ECFs 494-95), the proposed Settlement—providing for a \$239 million cash payment to resolve all claims—is an excellent result for the Class. The Settlement accounts for the substantial risks in taking this complex case to trial, the delay and expense of trial and post-trial appeals, and the desire for finality for the Parties.

The Settlement Amount (after deduction of fees and expenses) will be distributed equitably to Class Members pursuant to the Plan of Allocation. In addition, Class Counsel’s request for attorneys’ fees (22.18% of the Settlement Fund) and reimbursement of Litigation Expenses is fair and reasonable considering the result achieved for the Class, the extent and caliber of the work performed by Plaintiff’s Counsel, and the significant risks presented by the litigation.

¹ Capitalized terms not defined herein have the meanings set forth in the Stipulation and Agreement of Settlement dated November 4, 2025 (ECF 479-2). Unless otherwise noted, all internal quotation marks, citations, and other punctuation are omitted, and all emphasis is added.

The Class’s response to the Settlement has been resoundingly positive. In accordance with the Court’s Preliminary Approval Order, the Claims Administrator, JND Legal Administration (“JND”), conducted an extensive notice campaign—mailing over 767,000 notices to potential Class Members and nominees, publishing a summary notice in *The Wall Street Journal* and over *PR Newswire*, and posting relevant information and documents (including the Motions) on the case-dedicated website, www.CelgeneSecuritiesLitigation.com.² Defendants also issued notice pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 et seq. ECF 486. The notice campaign informed Class Members of the Settlement as well as their options in connection therewith. *See* Initial Mailing Decl., Exs. 1-3.

A total of 362,588 Claims have been received from potential Class Members seeking to participate in the Settlement, of which approximately 214,749 have been preliminarily deemed valid. Supp. Mailing Decl. ¶ 11. These Claims represent roughly 55% of the Class’s estimated damages.

Of the 362,000-plus Claims received, there have been just **four** objections—two to both the Settlement and fee/expense request, one to the Plan of Allocation, and one to the requirements for submitting a Claim. And of the four objectors, only

² *See* Supplemental Declaration of Luiggy Segura (“Supp. Mailing Decl.”) attached hereto as Exhibit 1, at ¶¶ 4, 6, as well as the previously-filed Declaration of Luiggy Segura (ECF 494-4) (“Initial Mailing Decl.”), at ¶ 12.

one (Mr. Yee) has established membership in the Class through transactional records—a threshold requirement for a valid objection. Standing deficiencies aside, all four objections present only generalized complaints without any meaningful discussion of the salient facts of the case or the work performed, and should be rejected.

II. THE CLASS’S REACTION PROVIDES ADDITIONAL SUPPORT FOR APPROVAL OF THE MOTIONS

In the Motions, Plaintiff and Class Counsel demonstrated that the Settlement, the Plan of Allocation, and the request for attorneys’ fees and Litigation Expenses are fair and reasonable and warrant the Court’s approval. Now that the objection deadline has passed, the Class’s reaction also strongly supports approval.

A. The Class’s Reaction to the Settlement and Plan of Allocation Has Been Favorable

The Third Circuit instructs district courts to consider the reaction of the class in determining whether to approve a settlement. *Girsh v. Jepsen*, 521 F.2d 153, 157 (3d Cir. 1975). Under *Girsh*, courts consider whether “the number of objectors, in proportion to the total class, indicates that the reaction of the class to the settlement is favorable.” *In re Schering-Plough Corp. Enhance Sec. Litig.*, 2013 WL 5505744, at *2 (D.N.J. Oct. 1, 2013); *see also In re NFL Players Concussion Injury Litig.*, 821 F.3d 410, 438 (3d Cir. 2016) (factor favored settlement where “only approximately 1% of class members objected and approximately 1% of class members opted out”).

Here, the Class’s reaction overwhelmingly supports a finding that the Settlement is fair, reasonable, and adequate. Despite the issuance of notice to hundreds of thousands of potential Class Members, there were only four objections. *See In re Cendant Corp. Litig.*, 264 F.3d 201, 235 (3d Cir. 2001) (“The vast disparity between the number of potential class members who received notice of the Settlement and the number of objectors creates a strong presumption . . . in favor of the Settlement”). As discussed in Section III below, the objections to the Settlement are unfounded and should be rejected.

Each of the four objections was submitted by an individual. The absence of any objections from institutional investors which, like Plaintiff, possess ample means and incentive to object to a settlement if they deem it unsatisfactory, provides particularly strong evidence of the Settlement’s fairness. *See, e.g., In re Facebook, Inc. IPO Sec. & Deriv. Litig.*, 343 F. Supp. 3d 394, 410 (S.D.N.Y. 2018) (“That not one sophisticated institutional investor objected to the Proposed Settlement is indicia of its fairness.”), *aff’d sub nom. In re Facebook, Inc.*, 822 F. App’x 40 (2d Cir. 2020); *In re AT&T Corp. Sec. Litig.*, 2005 WL 6716404, at *4 (D.N.J. Apr. 25, 2005) (reaction of class “weigh[ed] heavily in favor of approval” where “no objections were filed by any institutional investors who had great financial incentive to object”).

Also, the fact that just one objector challenges the Plan of Allocation (*see*

Supp. Mailing Decl. Ex. B) confirms that this plan is fair, reasonable, and adequate. *See Class Plaintiffs v. City of Seattle*, 955 F.2d 1268, 1284-85 (9th Cir. 1992) (confirming district court’s approval of plan of allocation as fair, reasonable, and adequate over one objection).

The absence of any objection by federal and state government officials in response to the CAFA notice further supports approval of the Settlement and Plan of Allocation, as well as the request for fees and expenses. *See, e.g., Rose v. Travelers Home & Marine Ins. Co.*, 2020 WL 4059613, at *3 (E.D. Pa. July 20, 2020) (approving settlement after noting that, among other things, “No governmental entity has objected to or otherwise responded to the Settlement in response to the CAFA notices.”).

B. The Class’s Reaction Also Supports Approval of Class Counsel’s Request for Attorneys’ Fees and Expenses

The Class’s reaction similarly supports Class Counsel’s motion for an award of attorneys’ fees and Litigation Expenses. Out of over 767,000 notices to potential Class Members, only two objections to the fee and expense request were received. *See, e.g., In re Ins. Brokerage Antitrust Litig.*, 282 F.R.D. 92, 121 (D.N.J. 2012) (“The absence of substantial objections by Settlement Class members to the fees requested by Class Counsel strongly supports approval.”); *Desantis v. SnapOn Tools Co., LLC*, 2006 WL 3068584, at *10 (D.N.J. Oct. 27, 2006) (“The fact that there were so few objectors to the amount of attorneys fees indicates that there is a positive

reaction amongst the class to the requested fees.”); *In re Rite Aid Corp. Sec. Litig.*, 396 F.3d 294, 305 (3d Cir. 2005) (receipt of only two class members’ objections to fee request is a “rare phenomenon”). As discussed in Section III below, the objections to the requested fees and expenses provide no basis for denying the requested relief.

As with the Settlement, the lack of any objections by institutional investors to the fee and expense request further confirms its reasonableness. Institutional investors are sophisticated and often have their own in-house legal departments and access to experienced outside lawyers. Because these investors know how to object to fee requests when appropriate and have an incentive to do so, it is significant that none objected here. *See, e.g., id.* at 305 (that “a significant number of investors in the class were sophisticated institutional investors that had considerable financial incentive to object had they believed the requested fees were excessive” and did not do so, supported approval of request); *In re GSE Bonds Antitrust Litig.*, 2020 WL 3250593, at *4, 6 (S.D.N.Y. June 16, 2020) (approving request for attorneys’ fees and noting that “a lack of objections from the class members, particularly from sophisticated institutional investors, to the proposed fees indicates that the quality of representation was high”).

III. THE FOUR OBJECTIONS LACK MERIT AND SHOULD BE REJECTED

A. The Lisi and Seamand Objections

Neither Mr. Lisi nor Mr. Seamand provided any documentation of their purchases of Celgene common stock during the Class Period, as required by the Preliminary Approval Order and instructed in the Notice. Accordingly, they each lack standing to object to the Settlement. *See Feder v. Elec. Data Sys. Corp.*, 248 F. App'x 579, 581 (5th Cir. 2007) (holding that objector who produced no evidence of class membership lacked standing: "Allowing someone to object to settlement in a class action based on this sort of weak, unsubstantiated evidence would inject a great deal of unjustified uncertainty into the settlement process"); *In re Synchrony Fin. Sec. Litig.*, 2023 WL 4992933, at *13 n.4 (D. Conn. Aug. 4, 2023 (noting objection did "not provide any basis to establish [class membership] and therefore does not comply with the terms set out in the Notice for submitting a claim or objection").

The merits of Mr. Lisi's and Mr. Seamand's objections were previously addressed in the Motions. ECF 494-1 at 22-25. For the reasons therein, Mr. Lisi's and Mr. Seamand's unsupported objections should be rejected.

B. The Krutoff Objection

Like Messrs. Lisi and Seamand, Mr. Krutoff did not provide the required information to establish Class membership and his standing to object. Supp. Mailing Decl. Ex. B. Aside from the standing deficiency, Mr. Krutoff's vague, one-sentence

objection should be rejected because it lacks any explanation and appears to misunderstand the measure of damages in securities fraud class actions generally, and the Plan of Allocation here.

Mr. Krutoff's objection simply states: "I should receive the same amount as everyone else per share." Supp. Mailing Decl. Ex. B. Awarding each eligible Class Member the same amount per share would not be fair as it would ignore the different circumstances surrounding each Class Member's transactions. Specifically, the calculation of losses for eligible Class Members under the Plan of Allocation appropriately depends on when the Class Member purchased (and sold) their shares, the price(s) of these purchases (and sales), and the PSLRA's statutory limitation on recoverable damages. ECFs 494-1 at 30-32; 494 at Ex. B, App. A. Indeed, "[a] plan of allocation that reimburses class members based on the type and extent of their injuries [relative to strength and value of their claims] is generally reasonable." *In re Lucent Techs., Inc., Sec. Litig.*, 307 F. Supp. 2d 633, 649 (D.N.J. 2004). An allocation consistent with Mr. Krutoff's objection would result in an inequitable distribution of the Net Settlement Fund and thus should be rejected.

C. The Yee Objection

Mr. Yee objects to both the Settlement and the request for fees and expenses.

First, Mr. Yee asserts that the "settlement represents only a modest recovery when compared to the substantial losses suffered by investors" and that the "per

share estimated at approximately \$0.43 per share after fees and costs raises concern as to whether the settlement adequately compensates class members.” Supp. Mailing Notice Ex. A.³ Mr. Yee provides no additional explanation as to why he believes the Settlement is modest or inadequate and he fails to provide any analysis or acknowledgment of the significant risks Plaintiff faced if the Action were to proceed. *See Bodnar v. Bank of Am., N.A.*, 2016 WL 4582084, at *4 (E.D. Pa. Aug. 4, 2016) (“[a] complaint that a settlement should have somehow been better is not proper grounds for objecting to a settlement”). Mr. Yee also ignores the fact that the Settlement represents 8.6% of the high end of the Class’s range of estimated potential damages—a recovery that, as the Court acknowledged in preliminarily approving the Settlement (ECF 488 at 3-4), is well within the range of approved securities class action recoveries. *See, e.g., In re Wilmington Tr. Sec. Litig.*, 2018 WL 6046452, at *8 (D. Del. Nov. 19, 2018) (noting “Third Circuit median recovery of 5% of damages in class action securities litigation”); *Schuler v. Medicines Co.*, 2016 WL 3457218, at *8 (D.N.J. June 24, 2016) (4% recovery “falls squarely within the range of previous settlement approvals”).

Second, Mr. Yee objects to “attorneys’ fees up to 30% of the Settlement Fund”

³ The \$0.43 per share figure referenced by Mr. Yee is the PSLRA’s required estimated average recovery per share after deduction of fees, expenses, and costs, which is calculated by dividing the Settlement Amount less fees, expenses, and costs by the estimated total number of damaged shares (in this case, roughly 422 million).

and asserts that “[t]he fee at this range is difficult to justify in a case involving settlement of this magnitude.” Supp. Mailing Notice Ex. A. Mr. Yee then endorses a range encompassing Class’s Counsel’s fee request, asserting that “[a] fee closer to 15-25% would better align with prevailing standards and ensure a greater proportion of the settlement will go to the class members.” *Id.* Because Class Counsel’s fee request in the amount of 22.18% falls well within the range asserted by Mr. Yee to “align with prevailing standards,” his objection on this ground is unfounded.

Class Counsel’s 22.18% fee request is amply supported by Plaintiff’s Counsel’s efforts in this case. *See* ECF 495-1 at 24. Prior to reaching the Settlement, Plaintiff’s Counsel litigated the Action for seven years, devoting more than 76,000 hours to its prosecution through every phase of litigation short of trial. ECF 484-1 at ¶¶ 5, 36-142. Class Counsel’s fee request—resulting in a modest lodestar multiplier of approximately 1.06—is well justified.

Finally, as noted above, Mr. Yee requests that the Court “carefully review the proposed Plan of Allocation to ensure that it treats all class members equitably.” Supp. Mailing Notice Ex. A. Here, the Plan of Allocation was developed by Plaintiff with the assistance of its damages expert. The Plan of Allocation is based on the estimated amount of artificial inflation in the price of Celgene common stock during the Class Period and will allocate the Settlement Funds to eligible Class Members in the same equitable manner, taking into account when each eligible Class Member

purchased (and sold) their stock and at what price(s). *See generally In re Gen. Instrument Sec. Litig.*, 209 F. Supp. 2d 423, 431 (E.D. Pa. 2001) (deeming plan of allocation “even handed” where “claimants are to be reimbursed on a *pro rata* basis for their recognized losses based largely on when they bought and sold their shares of [eligible] stock”).

For the foregoing reasons, Mr. Yee’s objection should be rejected.

IV. PRELIMINARY OVERVIEW OF CLAIMS

As noted above, JND has received 362,588 Claims in connection with the Settlement. Supp. Mailing Decl. ¶ 11. Of the total Claims, 2,316 Claims were submitted by mail or email; 4,084 Claims were submitted via the Website’s claim filing portal; and 356,188 Claims were submitted electronically by third-party filers and institutions. *Id.*

JND is currently processing the submitted Claims. *Id.*, ¶ 13. Based on JND’s initial review, approximately 214,749 Claims (out of the 362,588 Claims received, or roughly 59%) have been deemed either partially or fully valid and eligible for a payment from the Settlement. *Id.* These 214,749 provisionally valid Claims amount to a total loss of \$1,539,972,484.86, as calculated pursuant to the Plan of Allocation. This loss represents roughly 55% of the Class’s maximum potential damages

estimated by Plaintiff's damages expert (i.e., \$2.78 billion). *See* ECF 494-1 at ¶ 19.⁴ In addition, the total number of damaged shares claimed by the 214,749 provisionally valid Claims is 210,164,791.16—representing roughly half of the damaged shares (i.e., 422 million) estimated by Plaintiff's damages expert.⁵

The foregoing loss and damaged share amounts are preliminary and will fluctuate as the administration process progresses. All Claims are subject to further review, including a thorough review of the supporting documentation submitted with the Claims, and a deficiency process. During the deficiency process, Class Members who have submitted deficient Claims will be given the chance to cure the deficiencies in their Claims. JND will communicate with Class Members and, where possible, assist Class Members in curing the deficiencies in their Claims. JND will also perform further audits on the Claims for quality control and fraud prevention.

Plaintiff and Class Counsel respectfully submit that this claims response—and the preliminary losses and damaged shares represented by the Claims received to date—demonstrates that the notice program was successful in reaching Class Members and alerting them to their right to participate in the Settlement.

⁴ The \$1,539,972,484.86 loss figure is more than the low end of potential damages estimated by Plaintiff's damages expert (i.e., \$1.1 billion). ECF 479-1 at 24.

⁵ Notably, one third-party filer submitted approximately 50,000 Claims (of the 362,588 Claims received) without transactional information. When the transactional information is provided for these 50,000 Claims, the amount of losses and damaged shares provided herein will likely increase. Supp. Mailing Decl. at ¶ 11 n.4.

V. CONCLUSION

For these reasons, and those set forth in the Opening Papers, Plaintiff and Class Counsel respectfully request that the Court approve the Settlement, the Plan of Allocation, and the request for attorneys' fees and Litigation Expenses, including Plaintiff's request for costs incurred in representing the Class in the Action. Copies of: (i) the [Proposed] Judgment Approving Class Action Settlement; (ii) the [Proposed] Order Approving Plan of Allocation of Net Settlement Fund; and (iii) the [Proposed] Order Awarding Attorneys' Fees and Litigation Expenses are submitted herewith.

Dated: April 27, 2026

Respectfully submitted,

s/ James E. Cecchi

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

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

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

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA REGARDING:
(A) CONTINUED DISSEMINATION OF POSTCARD NOTICE AND
SETTLEMENT NOTICE; (B) UPDATE ON CALL CENTER SERVICES
AND WEBSITE; (C) REPORT ON OBJECTIONS RECEIVED; AND
(D) REPORT ON CLAIMS RECEIVED TO DATE**

I, Luiggy Segura, hereby declare under penalty of perjury as follows:

1. I am a Vice President of Securities Class Actions at JND Legal Administration (“JND”). Pursuant to Paragraph 4 of the Court’s Order Preliminarily Approving Settlement and Providing for Notice of Settlement, dated December 19, 2025 (ECF 493) (“Preliminary Approval Order”), Class Counsel was authorized to retain JND in connection with the proposed Settlement of the above-captioned action (“Action”).¹ I submit this Declaration as a supplement to my previously-filed Declaration of Luiggy Segura Regarding: (A) Dissemination of Postcard Notice and Settlement Notice; (B) Publication of the Summary Settlement Notice; (C) Updates

¹ All capitalized terms used in this Declaration that are not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated November 4, 2025 (ECF 479-2) and the Initial Mailing Declaration defined below.

to the Website and Call Center Services; and (D) Objections Received to Date, filed March 30, 2026 (ECF 494-4) (“Initial Mailing Declaration”).

2. I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts stated in this Declaration and, if called as a witness, could and would testify competently thereto.

CONTINUED DISSEMINATION OF NOTICE

3. Since the execution of the Initial Mailing Declaration, JND has continued to disseminate notice of the Settlement pursuant to requests from potential Class Members and Nominees. In response to such requests, JND has mailed or emailed 461 additional Settlement Notice Packets.

4. In total, as of April 27, 2026, JND has mailed or emailed 762,913 Postcard Notices and 4,975 Settlement Notice Packets to potential Class Members and Nominees. In addition, JND has promptly re-mailed 9,587 Postcard Notices that were returned by the U.S. Postal Service (“USPS”) as undeliverable and for which an updated address was provided.

UPDATE ON CALL CENTER SERVICES AND WEBSITE

5. JND continues to maintain the toll-free telephone helpline (1-855-648-0893) and interactive voice recording (“IVR”), along with the case-dedicated email address (info@CelgeneSecuritiesLitigation.com), to accommodate inquiries from potential Class Members. The toll-free telephone helpline is accessible 24 hours a

day, 7 days a week. Since the initial notice mailing on January 13, 2026, JND has received 2,921 in-bound calls to the telephone helpline, including 231 voice messages received after business hours. Callers have interacted with the IVR and spoken with JND's dedicated live operators trained to assist with questions related to the Action and the Settlement, including those concerning their Claims. Further, JND has made 740 out-bound calls to respond to voice messages received or to follow up on earlier communications. In addition, JND has received 1,532 emails to the case-dedicated inbox and has sent 1,551 outgoing emails in connection with the Settlement. JND has promptly responded to each telephone and email inquiry and will continue to respond to these inquiries until the conclusion of the administration.

6. JND also continues to maintain the Website dedicated to the Action (www.CelgeneSecuritiesLitigation.com) to further assist potential Class Members. On March 31, 2026, JND posted to the Website copies of the papers filed in support of Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation (ECF 494) and Class Counsel's Motion for Attorneys' Fees and Litigation Expenses (ECF 495). Since the initial notice mailing, the Website has received a total of 28,248 visitors.

7. JND will continue operating, maintaining and, as appropriate, updating the Website until the conclusion of the administration.

REPORT ON OBJECTIONS RECEIVED

8. As explained in the Initial Mailing Declaration, the Settlement Notice informed recipients that the deadline for Class Members to file a written objection to the Settlement, the Plan of Allocation, and/or Class Counsel's motion for attorneys' fees and Litigation Expenses, was April 23, 2026 at 5:00 p.m. The Settlement Notice also provided the requirements for submitting an objection.

9. As reported in the Initial Mailing Declaration, as of March 26, 2026, JND had received two objections to the case-dedicated email address. Copies of these objections were attached as Exhibits D and E to the Initial Mailing Declaration.

10. Since that time, JND has received two additional objections. Copies of these objections are attached hereto as Exhibits A and B. The total number of objections received by JND is four.² JND has not received Claims for any of the four objectors.

REPORT ON CLAIMS RECEIVED TO DATE

11. To be potentially eligible for a payment from the Net Settlement Fund, Class Members were required to submit a Claim, postmarked or received, by April 13, 2026, along with documentation to support their transactions in Celgene

² The objections and corresponding documents have been redacted to remove certain personal information (mailing address, email address, phone number, account information, and signature).

common stock. As of April 27, 2026, JND has received 362,588 Claims.³ Of these Claims: 4,084 Claims were submitted via the Website's claim filing portal, 2,316 Claims were received by mail or email, and 356,188 Claims were submitted electronically by third party filers and institutions. JND has preliminarily reviewed these Claims. Following this review, JND has determined that approximately 214,749 Claims are either partially or fully eligible to receive a payment from the Settlement. These 214,749 Claims calculate to estimated aggregate Recognized Claims of \$1,539,972,484.86 pursuant to the Plan of Allocation. These Claims also represent approximately 210,164,791.16 damaged shares, which is within the range of damaged shares seen in recent securities class action settlements administered by JND.⁴ These amounts are preliminary and will likely fluctuate as the administration progresses.

12. Of the remaining Claims received and reviewed, approximately 124,234 Claims are ineligible and approximately 23,605 are deficient as filed. JND is currently in the process of notifying Claimants with deficient and ineligible Claims and will work with Claimants in order to rectify curable deficiencies in their Claims.

³ JND is continuing to receive timely Claims and these Claims are being scanned in the database and processed on a rolling basis as they are received.

⁴ Notably, one third-party claim filer submitted 50,000 Claims without transactional information. These 50,000 Claims are reflected in the 362,588 total Claims reported. When the transactional information is provided for these 50,000 Claims, the amount of aggregate Recognized Claims of the 362,588 Claims received will increase.

Claims that do not meet the submission requirements after being given an opportunity to cure deficiencies may ultimately be rejected.

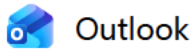
13. In the coming months, JND will continue to review and process the Claims received and conduct the necessary quality control and auditing to ensure all Claims are calculated and valued correctly.

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

Executed on April 27, 2026 in New Hyde Park, New York.


Luiggy Segura

EXHIBIT A



Objection to Celgene Corp Securities Litigation Case No: 2:18-cv-04772 (MEF)(JBC)

From Kelvin Yee [REDACTED]

Date Wed 4/22/2026 3:08 AM

To CA - info@celgenesecuritieslitigation.com <info@celgenesecuritieslitigation.com>

📎 3 attachments (1 MB)

Documentation of Membership in the Class.pdf; Celgene Proof of Shares.pdf; Celgene Proof of Purchase.pdf;

Kelvin Yee

[REDACTED]
San Marino, CA
[REDACTED]

April 21, 2026

Clerk of the Court
United States District Court
District of New Jersey
Re: In re Celgene Corporation Securities Litigation,
Case No: 2:18-cv-04772(MEF)(JBC)

Objection to proposed class action settlement

Dear Judge,

I am a member of the Settlement Class in the above-captioned action. I respectfully submit this objection to the proposed settlement pursuant to Rule 23(e)(5) of the Federal Rules of Civil Procedure.

I do not oppose settlement in principle. However, I object to specific aspects of the proposed settlement on the grounds that they are not fair, reasonable, or adequate to the class but I will remain in this Class action.

I. Inadequate Recovery Relative to Potential Damages

The proposed \$239 million settlement represents only a modest recovery when compared to the substantial losses allegedly suffered by investors. The recovery per share estimated at approximately \$0.43 per share after fees and costs raises concern as to whether the settlement adequately compensates class members.

II. Excessive Attorneys' Fees

I further object to the request for attorneys' fees up to 30% of the settlement fund. The fee at this range is difficult to justify in a case involving settlement of this magnitude. A fee closer to 15-25%

would better align with prevailing standards and ensure a greater proportion of the settlement will go to the class members.

III. Potential Issues with Plan of Allocation

I also request that the Court carefully review the proposed Plan of Allocation to ensure that it treats all class members equitably.

I do not intend to appear at the final approval hearing.

I certify that I am a member of the Settlement Class. My transaction in Celgene securities during the Class Period are as follows:

2/13/2018	100 Shares	Cost: \$9,050
3/26/2018	1000 Shares	Cost: \$90,000
4/23/2018	1000 Shares	Cost: \$110,000

Please see attached for proof of membership, proof of purchase, and April 2018 statement proof of ownership of 2100 shares.

Respectfully,

Kelvin Yee

COURT-ORDERED LEGAL NOTICE

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

Your legal rights may be affected by this securities class action. You may be eligible for a cash payment from the Settlement. Please read this Postcard Notice carefully.

For more information, please visit www.CelgeneSecuritiesLitigation.com, email info@CelgeneSecuritiesLitigation.com, or call 1-855-648-0893.

Versiones en español del aviso y del formulario de reclamación están disponibles en la página de red.



CELGENE CORP. SECURITIES LITIGATION
C/O JND LEGAL ADMINISTRATOR
P.O. BOX 91422
SEATTLE, WA 98111

PRESORTED FIRST CLASS
U.S. POSTAGE PAID
FARMINGDALE, NY
PERMIT NO.225

JOB#N29209-010

00290761

3#



01



*****AUTO**ALL FOR AADC 913

SAN MARINO CA



01

THIS POSTCARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT.
Please visit www.CelgeneSecuritiesLitigation.com for more information.

The parties in the securities class action *In re Celgene Corporation Securities Litigation*, Case No. 2:18-cv-04772 (MEF) (JBC) (D.N.J.) (the "Action") have reached a proposed settlement of all claims asserted in the Action against Celgene Corporation ("Celgene") and former Celgene officers Terrie Curran and Philippe Martin (together, the "Individual Defendants" and, with Celgene, "Defendants"). If approved, the Settlement will resolve the Action. In the Action, Class Representative AMF Tjänstespension AB alleges that Defendants made materially false and misleading statements between April 27, 2017 and April 27, 2018, inclusive (the "Class Period") concerning certain Celgene products and product candidates, including the pharmaceutical drugs and drug candidates known as GED-0301, Otezla, and Ozanimod. Defendants deny any liability or wrongdoing. You received this notice because you, or an account for which you serve as a custodian, may be a member of the following certified Class: all persons and entities who purchased Celgene common stock during the Class Period and were damaged thereby.

Pursuant to the Settlement, Defendants have agreed to pay **\$239,000,000 in cash**, which, after deducting any Court-awarded fees and expenses, notice and administration costs, and taxes, will be allocated among Class Members who submit valid claims, in exchange for the Settlement of the Action and the release of all claims asserted in the Action and related claims. **For additional information regarding the Settlement, please review the full Settlement Notice available at www.CelgeneSecuritiesLitigation.com.** If you are a Class Member, your *pro rata* share of the Settlement will depend on the number of valid claims submitted, and the number, size, and timing of your transactions in Celgene common stock during the relevant time period. If all Class Members elect to participate in the Settlement, the estimated average recovery per eligible share will be approximately \$0.57 *before* deducting any Court-approved fees, expenses, and costs. Your actual share of the Settlement will be determined pursuant to the Plan of Allocation set forth in the full Settlement Notice, or other plan ordered by the Court.

To be eligible for a payment, you must submit a valid Claim Form. The Claim Form can be found and submitted on www.CelgeneSecuritiesLitigation.com, or you can request that one be mailed to you. **Claim Forms must be postmarked (if mailed), or submitted online, by April 13, 2026.** If you want to object to any aspect of the Settlement, you must file, mail or email (to counsel or the administrator at info@CelgeneSecuritiesLitigation.com) an objection on or before **April 23, 2026 at 5:00 p.m.** The full Settlement Notice provides instructions on how to submit a Claim Form and how to object, and you must comply with all the instructions in the Settlement Notice. Because Class Members were previously provided the opportunity to request exclusion from the Class in connection with class certification, the Court is not permitting a second opportunity to request exclusion in connection with the Settlement.

The Court will hold a hearing on **May 4, 2026, at 9:00 a.m.**, to consider, among other things, whether to approve the Settlement and a request by the lawyers representing the Class for up to 22.2% of the Settlement Fund in attorneys' fees, plus expenses of no more than \$5.75 million (which equals a cost of approximately \$0.14 per eligible share). You may attend the hearing and ask to be heard by the Court, but you do not have to. **For more information, call 1-855-648-0893, email info@CelgeneSecuritiesLitigation.com, or visit www.CelgeneSecuritiesLitigation.com.**



XXXXXXXXXX

[Redacted]

SAN GABRIEL CA [Redacted]

Branch Office	
[Redacted]	[Redacted]
Account Number	Office
[Redacted]	[Redacted]
Period Beginning	Period Ending
02 / 01 / 2018	02 / 28 / 2018

INFORMATION UPDATE

P1

P1

MARGIN ACCOUNT ACTIVITY

Date	Transaction	Symbol / Cusip	Quantity	Tax Lot Method**	Description	Price	Amount	Balance
02/13/18	BOUGHT	CELG	100		CELGENE CORP	90.50	-9,050.00	



Statement Reporting Period:
03/01/18 - 03/31/18

Statement for Account [REDACTED]
KELVIN YEE AND JOYCE L YEE TRUSTEES FBO KELVIN &
[REDACTED]
SAN GABRIEL, CA [REDACTED]

Portfolio Summary

Statement for Account # [REDACTED] PageID: 53852

03/01/18 - 03/31/18

Account Activity

Trade Date	Settle Date	Acct Type	Transaction/ Cash Activity*	Description	Symbol/ CUSIP	Quantity	Price	Amount	Balance
03/26/18	03/27/18	Margin	Buy - Securities Purchased	CELGENE CORP COM Commission/Fee 17.00	CELG	1,000	90.00	(90,017.00)	[REDACTED]

Statement for Account :

04/01/18 - 04/30/18

Account Activity

Trade Date	Settle Date	Acct Type	Transaction/ Cash Activity*	Description	Symbol/ CUSIP	Quantity	Price	Amount	Balance
04/23/18	04/24/18	Margin	Buy - Securities Purchased	CELGENE CORP COM	CELG	1,000	110.00	(110,017.00)	

Statement for Account # [REDACTED]

04/01/18 - 04/30/18

Income Summary Detail*

Description	Current	Year to Date
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[REDACTED]	[REDACTED]	[REDACTED]
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*This section displays current and year to date taxation values for this account. The current totals may not equate to the total payments listed on this statement as corrections to tax reporting may also be included. These corrections can include changes made to previous payments and removal of payments reportable in a previous tax year (spillover dividends). The year to date totals will accurately reflect your cumulative amount for the year.

Account Positions

Investment Description	Symbol/ CUSIP	Quantity	Current Price	Market Value	Purchase Date	Cost Basis	Average Cost	Unrealized Gain(Loss)	Estimated Income	Yield
------------------------	------------------	----------	------------------	-----------------	------------------	---------------	-----------------	--------------------------	---------------------	-------

✓ CELGENE CORP COM	CELG	2,100	87.10	182,910.00	02/09/18	198,014.28	94.29	(15,104.28)	-	-
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EXHIBIT B

From: Bradford Krutoff [REDACTED]
Sent: Thursday, April 23, 2026 5:53 PM
To: CA - info@celgenesecuritieslitigation.com
Subject: Objection to Celgene corporation Securities litigation

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Categories: Objection Request

I am filing an Objection to Celgene corporation Securities litigation.

I should receive the same amount as everyone else per share.

Thank you,

Yue yuan
Sent from my iPhone

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

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

CLASS ACTION

[PROPOSED] JUDGMENT APPROVING CLASS ACTION SETTLEMENT

WHEREAS, a consolidated securities class action is pending in this Court entitled *In re Celgene Corporation Securities Litigation*, Case No. 2:18-cv-04772 (MEF) (JBC) (D.N.J.) (the “Action”)¹;

WHEREAS, by Order dated November 25, 2020 (ECF 115), the Court certified the Action to proceed as a class action on behalf of all persons and entities who purchased the common stock of Celgene between April 27, 2017 and April 27, 2018, inclusive, and were damaged thereby.² The Court also appointed Lead Plaintiff AMF Tjänstespension AB as Class Representative for the Class, and appointed Lead Counsel Kessler Topaz Meltzer & Check, LLP as Class Counsel for the Class;

¹ Unless otherwise defined in this Judgment, the capitalized terms herein shall have the same meanings they have in the Stipulation (defined below).

² Excluded from the Class are: (i) Defendants; (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. *See* Stipulation and Agreement of Settlement dated November 4, 2025 (the “Stipulation”), at ¶ 1(i). Also excluded from the Class are (i) the persons and entities who excluded themselves from the Class pursuant to the Class Notice as listed in Exhibit 1 hereto; and (ii) Judge Michael E. Farbiarz, Judge James B. Clark, III, their current or former chambers staff, and any of their family members.

WHEREAS, by Order dated April 21, 2022 (ECF 199), the Court approved the proposed form and content of the Class Notice to be disseminated to the Class Members to notify them of, among other things: (i) the Action pending against Defendants; (ii) the Court's certification of the Action to proceed as a class action on behalf of the Class; and (iii) Class Members' right to request to be excluded from the Class by July 11, 2022, the effect of remaining in the Class or requesting exclusion, and the requirements for requesting exclusion; and approved the method of dissemination of the Class Notice;

WHEREAS, the Class Notice was mailed beginning on May 11, 2022 to all potential Class Members who could be identified through reasonable effort, resulting in the mailing of 751,520 copies of the Postcard Class Notice and 6,176 copies of the longer Class Notice, and thirty (30) requests for exclusion from the Class were received by July 11, 2022 (ECF 215, at ¶ 18 & Ex. C);

WHEREAS, (a) Class Representative, on behalf of itself and the Class; and (b) defendant Celgene Corporation ("Celgene" or the "Company") and defendants Terrie Curran and Philippe Martin (collectively, the "Individual Defendants," and together with Celgene, "Defendants," and, together with Class Representative, the "Parties") have entered into the Stipulation, that provides for a complete dismissal with prejudice and release of the claims asserted against Defendants in the Action on the terms and conditions set forth in the Stipulation, subject to the approval of this Court (the "Settlement");

WHEREAS, on November 4, 2025, Class Representative made a motion, pursuant to Federal Rule of Civil Procedure 23(e)(1), for an order preliminarily approving the Settlement in accordance with the Stipulation and allowing notice to Class Members, and on November 24, 2025, Class Counsel made a supplemental submission in further support of preliminary approval, attaching evidentiary support and a declaration from Class Representative's damages expert;

WHEREAS, by Opinion and Order dated December 5, 2025 (“December 5, 2025 Opinion and Order”) (ECF 488), the Court granted Class Representative’s motion but required certain revisions to the Claim Form and notice materials, which Class Counsel revised and resubmitted to the Court on December 16, 2025;

WHEREAS, as reflected in the December 5, 2025 Opinion and Order, the Court worked through the factors for preliminary approval of class action settlements set forth in *Girsh v. Jepsen*, 521 F.2d 153, 157 (3d Cir. 1975) and its progeny, evaluated (among other things) the recovery contemplated by the Settlement and the risks to the Class posed by continued litigation through trial and appeal, and was satisfied that it likely could approve the Settlement;

WHEREAS, more specifically, the Court found that (i) “[a]s to process, the facts [of the case] have been well developed, and the proposed settlement seems to have been struck at arms-length”; and (ii) “as to substance, the proposed settlement realistically reflects the core risks to the Plaintiff of pushing on to trial,” including “the risk (a) that the Plaintiff does not win on liability (say, because the jury does not find that there was scienter), and (b) that if the Plaintiff does win on liability, the class-wide damages would be lower to an extent than the number its expert landed on” (ECF 488 at 6);

WHEREAS, by Order dated December 19, 2025 (the “Preliminary Approval Order”) (ECF 493), this Court: (a) found, pursuant to Rule 23(e)(1)(B) of the Federal Rules of Civil Procedure, that it would likely be able to approve the Settlement as fair, reasonable, and adequate under Rule 23(e)(2); (b) ordered that notice of the proposed Settlement be provided to potential Class Members; (c) provided Class Members with the opportunity to object to the proposed Settlement; and (d) scheduled a hearing regarding final approval of the Settlement;

WHEREAS, due and adequate notice has been given to the Class;

WHEREAS, in accordance with the Preliminary Approval Order, the Claims Administrator disseminated over 767,000 notices to potential Class Members and their nominees and in response: (i) over 362,000 Claims were submitted, of which approximately 214,749 have been determined to be provisionally valid, and (ii) four objections (two to both the Settlement and fee/expense request, one to the Plan of Allocation, and one to the requirements for submitting a Claim) were received, with only one of the objectors having submitted proof of transactions in Celgene common stock to establish Class membership and thus standing to object to the Settlement;

WHEREAS, the Court conducted a hearing on May 4, 2026 (the “Settlement Hearing”) to consider, among other things, (a) whether the terms and conditions of the Settlement are fair, reasonable, and adequate to the Class, and should therefore be approved; and (b) whether a judgment should be entered dismissing the Action with prejudice as against the Defendants; and

WHEREAS, the Court having reviewed and considered the Stipulation, all papers filed and proceedings held herein in connection with the Settlement, all oral and written comments received regarding the Settlement, and the record in the Action, and good cause appearing for the reasons set forth in the Court’s December 5, 2025 Opinion and Order, which apply equally to the Court’s decision regarding final approval of the Settlement, and the reasons articulated by the Court at the May 4, 2026 Settlement Hearing;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

1. **Jurisdiction** – The Court has jurisdiction over the subject matter of the Action, and all matters relating to the Settlement, as well as personal jurisdiction over all of the Parties and each of the Class Members.

2. **Incorporation of Settlement Documents** – This Judgment incorporates and makes a part hereof: (a) the Stipulation filed with the Court on November 4, 2025; and (b) the Postcard

Notice, Settlement Notice, and Summary Settlement Notice, which were filed with the Court on March 30, 2026.

3. **Notice** – The Court finds that the dissemination of the Postcard Notice, Settlement Notice, and Claim Form and the publication of the Summary Settlement Notice: (a) were implemented in accordance with the Preliminary Approval Order; (b) constituted notice that was reasonably calculated, under the circumstances, to apprise Class Members of (i) the effect of the proposed Settlement (including the Releases to be provided thereunder), (ii) Class Counsel’s motion for attorneys’ fees and Litigation Expenses, (iii) their right to object to any aspect of the Settlement, the Plan of Allocation, and/or Class Counsel’s motion for attorneys’ fees and Litigation Expenses, and (iv) their right to appear at the Settlement Hearing; (c) constituted due, adequate, and sufficient notice to all persons and entities entitled to receive notice of the proposed Settlement; and (d) satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause), the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, as amended, and all other applicable law and rules.

4. **CAFA Notice** – Defendants issued notice pursuant to the Class Action Fairness Act of 2005, 28 U.S.C. § 1715 et seq. on or before November 13, 2025. ECF 486. The Court finds that the notice requirements set forth in the Class Action Fairness Act of 2005, 28 U.S.C. § 1715, to the extent applicable to the Action, have been satisfied.

5. **Objections** – The Court has considered each of the objections to the Settlement submitted pursuant to Rule 23(e)(5) of the Federal Rules of Civil Procedure. The Court finds and concludes that each of the objections is without merit, and each is hereby overruled.

6. **Final Settlement Approval and Dismissal of Claims** – Pursuant to, and in accordance with, Rule 23(e)(2) of the Federal Rules of Civil Procedure, this Court hereby fully

and finally approves the Settlement set forth in the Stipulation in all respects (including, without limitation: the amount of the Settlement; the Releases provided for therein; and the dismissal with prejudice of the claims asserted against Defendants in the Action), and finds that the Settlement is, in all respects, fair, reasonable, and adequate to the Class. Specifically, the Court finds that: (a) Class Representative and Class Counsel have adequately represented the Class; (b) the Settlement was negotiated by the Parties at arm's length; (c) the relief provided for the Class under the Settlement is adequate taking into account the costs, risks, and delay of trial and appeal; the proposed means of distributing the Settlement Fund to the Class; and the proposed attorneys' fee award; and (d) the Settlement treats members of the Class equitably relative to each other. The Parties are directed to implement, perform, and consummate the Settlement in accordance with the terms and provisions contained in the Stipulation.

7. The Action and all of the claims asserted against Defendants in the Action by Class Representative and the other Class Members are hereby dismissed with prejudice. The Parties shall bear their own costs and expenses, except as otherwise expressly provided in the Stipulation.

8. **Binding Effect** – The terms of the Stipulation and of this Judgment shall be forever binding on Defendants, Class Representative, and all other Class Members (regardless of whether or not any individual Class Member submits a Claim Form or seeks or obtains a distribution from the Net Settlement Fund), as well as their respective successors and assigns.

9. **Releases** – The Releases set forth in paragraphs 5 and 6 of the Stipulation, together with the definitions contained in paragraph 1 of the Stipulation relating thereto, are expressly incorporated herein in all respects. The Releases are effective as of the Effective Date. Accordingly, this Court orders that:

(a) Without further action by anyone, and subject to paragraph 10 below, upon the Effective Date of the Settlement, Class Representative and each of the other Class Members, on behalf of themselves, and their respective heirs, executors, administrators, predecessors, successors, assigns, representatives, attorneys, and agents, in their capacities as such, shall be deemed to have, and by operation of law and of this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Plaintiff's Claim (including, without limitation, Unknown Claims) against Defendants and the other Defendants' Releasees, and shall forever be barred and enjoined from prosecuting any or all of the Released Plaintiff's Claims directly or indirectly against any of the Defendants and the other Defendants' Releasees.

(b) Without further action by anyone, and subject to paragraph 10 below, upon the Effective Date of the Settlement, Defendants, on behalf of themselves, and their respective heirs, executors, administrators, predecessors, successors, assigns, representatives, attorneys, and agents, in their capacities as such, shall be deemed to have, and by operation of law and of this Judgment shall have, fully, finally, and forever compromised, settled, released, resolved, relinquished, waived, and discharged each and every Released Defendants' Claim (including, without limitation, Unknown Claims) against Class Representative and the other Plaintiffs' Releasees, and shall forever be barred and enjoined from prosecuting any or all of the Released Defendants' Claims directly or indirectly against any of the other Plaintiffs' Releasees.

10. Notwithstanding paragraphs 9(a)–(b) above, nothing in this Judgment shall bar any action by any of the Parties to enforce or effectuate the terms of the Stipulation or this Judgment.

11. **Rule 11 Findings** – The Court finds and concludes that the Parties and their respective counsel have complied in all respects with the requirements of Rule 11 of the Federal

Rules of Civil Procedure in connection with the institution, prosecution, defense, and settlement of the Action.

12. **No Admissions** – Neither this Judgment, the Stipulation, including the exhibits thereto and the Plan of Allocation contained therein (or any other plan of allocation that may be approved by the Court), the Parties’ mediations and subsequent Settlement, the communications and/or discussions leading to the execution of the Stipulation, nor any proceedings taken pursuant to or in connection with the Stipulation and/or approval of the Settlement (including any arguments proffered in connection therewith):

(a) shall be offered against any of the Defendants’ Releasees as evidence of, or construed as, or deemed to be evidence of any presumption, concession, or admission by any of the Defendants’ Releasees with respect to the truth of any fact alleged by Class Representative or the validity or infirmity of any claim that was or could have been asserted or the deficiency of any defense that has been or could have been asserted in this Action or in any other litigation, or of any liability, negligence, fault, or other wrongdoing of any kind of any of the Defendants’ Releasees, or in any way referred to for any other reason as against any of the Defendants’ Releasees, in any arbitration proceeding or other civil, criminal, or administrative action or proceeding, other than such proceedings as may be necessary to effectuate the provisions of the Stipulation;

(b) shall be offered against any of the Plaintiff’s Releasees as evidence of, or construed as, or deemed to be evidence of any presumption, concession, or admission by any of the Plaintiff’s Releasees that any of their claims are without merit, that any of the Defendants or the other Defendants’ Releasees had meritorious defenses, or that damages recoverable under the Complaint would not have exceeded the Settlement Amount, or with

respect to any liability, negligence, fault, or wrongdoing of any kind, or in any way referred to for any other reason as against any of the Plaintiff's Releasees, in any arbitration proceeding or other civil, criminal, or administrative action or proceeding, other than such proceedings as may be necessary to effectuate the provisions of the Stipulation; or

(c) shall be construed against any of the Releasees as an admission, concession, or presumption that the consideration to be given under the Settlement represents the amount which could be or would have been recovered after trial;

provided, however, that the Parties and any other of the Releasees and their respective counsel may refer to this Judgment and the Stipulation to effectuate the protections from liability granted hereunder and thereunder or otherwise to enforce the terms of the Settlement.

13. **Retention of Jurisdiction** – Without affecting the finality of this Judgment in any way, this Court retains continuing and exclusive jurisdiction over: (a) the Parties for purposes of the administration, interpretation, implementation, and enforcement of the Settlement; (b) the disposition of the Settlement Fund; (c) any motion for an award of attorneys' fees and/or Litigation Expenses in the Action that will be paid from the Settlement Fund; (d) any motion to approve the Plan of Allocation; (e) any motion to approve the Class Distribution Order; and (f) the Class Members for all matters relating to the Action.

14. Separate orders shall be entered regarding approval of a plan of allocation and the motion of Class Counsel for an award of attorneys' fees and Litigation Expenses. Such orders shall in no way affect or delay the finality of this Judgment and shall not affect or delay the Effective Date of the Settlement.

15. **Termination of Settlement** – If the Settlement is terminated as provided in the Stipulation or the Effective Date of the Settlement otherwise fails to occur, this Judgment shall be

vacated and rendered null and void, and shall be of no further force and effect, except as otherwise provided by the Stipulation, and this Judgment shall be without prejudice to the rights of Class Representative, the other Class Members, and Defendants, and the Parties shall revert to their respective positions in the Action as of September 25, 2025, as provided in the Stipulation.

16. **Entry of Final Judgment** – There is no just reason to delay the entry of this Judgment as a final judgment in this Action. Accordingly, the Clerk of the Court is expressly directed to immediately enter this final judgment in this Action.

SO ORDERED this _____ day of _____, 2026.

The Honorable Michael E. Farbiarz
United States District Judge

EXHIBIT 1

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

<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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<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; Nomura Institutional Fund Select, solely on behalf of its sub-fund Nomura Institutional Fund Select – American Century Global</p>	<p>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 C/O Daniel L. Berger Grant & Eisenhofer P.A. Kansas City, MO</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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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

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

CLASS ACTION

**[PROPOSED] ORDER APPROVING PLAN OF ALLOCATION
OF NET SETTLEMENT FUND**

This matter is before the Court on Plaintiff's motion to determine whether the proposed plan for allocating the Net Settlement Fund ("Plan of Allocation") created by the Settlement achieved in the above-captioned securities class action ("Action") should be approved. The Court having considered all matters submitted to it; and it appearing that notice substantially in the form approved by the Court, which advised Class Members of the Plan of Allocation, was mailed to all Class Members who or which could be identified with reasonable effort, and that a summary notice substantially in the form approved by the Court was published in *The Wall Street Journal* and transmitted over *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the proposed Plan of Allocation,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Stipulation and Agreement of Settlement dated as of November 4, 2025 (ECF 479-2) ("Stipulation") and all capitalized terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation.

2. The Court has jurisdiction to enter this Order and over the subject matter of the Action and all Parties to the Action, including all Class Members.

3. Notice of Plaintiff's motion for approval of the Plan of Allocation was given to all Class Members who or which could be identified with reasonable effort. The form and method of notifying the Class of the motion for approval of the proposed Plan of Allocation satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause), the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, as amended, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Over 767,000 notices were mailed and/or emailed to potential Class Members and Nominees, and the Notice which included the Plan of Allocation was posted on the Settlement Website, www.CelgeneSecuritiesLitigation.com.

5. There was one objection to the Plan of Allocation, which the Court has considered and rejected.

6. The Court hereby finds and concludes that the formula for the calculation of the claims of Claimants as set forth in the Plan of Allocation provides a fair and reasonable basis upon which to allocate the proceeds of the Net Settlement Fund among Class Members with due consideration having been given to administrative convenience and necessity.

7. The Court hereby finds and concludes that the Plan of Allocation is, in all respects, fair and reasonable to the Class. Accordingly, the Court hereby approves the Plan of Allocation proposed by Plaintiff.

8. Any appeal or any challenge affecting this Court's approval of the Plan of Allocation shall in no way disturb or affect the finality of the Judgment.

9. There is no just reason for delay in the entry of this Order, and immediate entry by

the Clerk of the Court is expressly directed.

SO ORDERED this ____ day of _____, 2026.

The Honorable Michael E. Farbiarz
United States District Judge

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

IN RE CELGENE CORPORATION
SECURITIES LITIGATION

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

CLASS ACTION

**[PROPOSED] ORDER AWARDING ATTORNEYS' FEES
AND LITIGATION EXPENSES**

This matter is before the Court on Class Counsel's motion for an award of attorneys' fees and Litigation Expenses. The Court having considered all matters submitted to it; and it appearing that notice substantially in the form approved by the Court, which advised of Class Counsel's request for an award of attorneys' fees and Litigation Expenses, was mailed to all Class Members who or which could be identified with reasonable effort, and that a summary notice substantially in the form approved by the Court was published in *The Wall Street Journal* and transmitted over *PR Newswire* pursuant to the specifications of the Court; and the Court having considered and determined the fairness and reasonableness of the attorneys' fees and Litigation Expenses requested,

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. This Order incorporates by reference the definitions in the Stipulation and Agreement of Settlement dated as of November 4, 2025 (ECF 479-2) ("Stipulation"), and all capitalized terms not otherwise defined herein shall have the same meanings as set forth in the Stipulation.

2. The Court has jurisdiction to enter this Order and over the subject matter of the Action and all Parties to the Action, including all Class Members.

3. Notice of Class Counsel's motion for an award of attorneys' fees and Litigation Expenses was given to all Class Members who or which could be identified with reasonable effort. The form and method of notifying the Class of the motion for an award of attorneys' fees and Litigation Expenses satisfied the requirements of Rule 23 of the Federal Rules of Civil Procedure, the United States Constitution (including the Due Process Clause), the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4, as amended, and all other applicable law and rules, constituted the best notice practicable under the circumstances, and constituted due and sufficient notice to all persons and entities entitled thereto.

4. Plaintiff's Counsel are hereby awarded attorneys' fees in the amount of _____% of the Settlement Fund (which amount includes interest) and \$_____ in payment of Plaintiff's Counsel's litigation expenses (which fees and expenses shall be paid from the Settlement Fund), which sums the Court finds to be fair and reasonable. Class Counsel shall allocate the attorneys' fees awarded among Plaintiff's Counsel in a manner which it, in good faith, believes reflects the contributions of such counsel to the institution, prosecution, and settlement of the Action.

5. In making this award of attorneys' fees and payment of expenses from the Settlement Fund, the Court has considered and found that:

A. The Settlement has created a fund of \$239 million in cash that has been funded into escrow pursuant to the terms of the Stipulation, and numerous Class Members who submit acceptable Claims will benefit from the Settlement that occurred because of the efforts of Plaintiff's Counsel;

B. The requested fee has been reviewed and approved as reasonable by Plaintiff, a sophisticated institutional investor that actively supervised the Action;

C. Over 767,000 notices were mailed and/or emailed to potential Class

Members and Nominees stating that Class Counsel would apply for an award of attorneys' fees in an amount not to exceed 22.2% of the Settlement Fund and for payment of Litigation Expenses in an amount not to exceed \$5.75 million, and only two objections to the requested attorneys' fees have been received, which the Court has considered and rejected;

D. Plaintiff's Counsel conducted the litigation and achieved the Settlement with skill, perseverance, and diligent advocacy, and prosecuted the Class's claims through full discovery, class certification, and summary judgment;

E. The Action raised a number of complex issues, including those described in this Court's Opinion and Order dated December 5, 2025 granting Plaintiff's motion for preliminary approval of the Settlement (for example, the ability to establish scienter and maximum claimed damages) (ECF 488);

F. Had Class Counsel not achieved the Settlement there would remain a significant risk that Plaintiff and the other members of the Class may have recovered less or nothing from Defendants;

G. Plaintiff's Counsel devoted more than 76,000 hours, with a lodestar value of \$49,874,424.50, to achieve the Settlement; and

H. The amount of attorneys' fees awarded and expenses to be paid from the Settlement Fund are fair and reasonable and consistent with awards in similar cases.

6. Plaintiff AMF Tjänstepension AB is hereby awarded \$_____ as reimbursement for its reasonable costs and expenses directly related to its representation of the Class in the Action.

7. Any appeal or any challenge affecting this Court's approval regarding any attorneys' fees and expense application shall in no way disturb or affect the finality of the Judgment.

8. In the event that the Settlement is terminated or the Effective Date of the Settlement otherwise fails to occur, this Order shall be rendered null and void to the extent provided by the Stipulation.

9. There is no just reason for delay in the entry of this Order, and immediate entry by the Clerk of the Court is expressly directed.

SO ORDERED this ____ day of _____, 2026.

The Honorable Michael E. Farbiarz
United States District Judge