

**DECLARATION OF  
JOHN T. McGANN**

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International Trading Group, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSE CHUNG LUO, Individually and on  
Behalf of All Others Similarly Situated,  
  
Plaintiff,  
  
vs.  
  
SPECTRUM PHARMACEUTICALS, INC., et  
al.,  
  
Defendants.

No. 2:21-cv-01612-CDS-BNW

CLASS ACTION

DECLARATION OF JOHN T. McGANN  
FILED ON BEHALF OF INTERNATIONAL  
TRADING GROUP, INC. IN SUPPORT OF  
FINAL APPROVAL OF SETTLEMENT  
AND APPLICATION FOR AWARD OF  
ATTORNEYS' FEES AND EXPENSES

1 I, JOHN T. McGANN, declare as follows:

2 1. I am the sole proprietor of the International Trading Group, Inc., Lead Plaintiff in this  
3 matter ("Lead Plaintiff"). Lead Plaintiff was appointed by the Court on July 28, 2022. As sole  
4 proprietor of Lead Plaintiff, I oversee the litigation activities of Lead Counsel Robbins Geller  
5 Rudman & Dowd LLP ("Lead Counsel") in this action.

6 2. I am an individual investor and business owner with substantial professional  
7 experience in the fields of finance and corporate governance.

8 3. I submit this declaration to provide the Court with a description of my efforts in  
9 connection with representing the Class in this action, and to express my support for final approval of  
10 the Settlement, the Plan of Allocation, Lead Counsel's fee and expense requests, and my request for  
11 an award pursuant to 15 U.S.C. §78u-4(a)(4).

12 4. I have actively monitored and participated in this case since November 1, 2021, when  
13 Lead Plaintiff moved the Court to be appointed Lead Plaintiff. Since that time, and throughout the  
14 course of this litigation, I regularly communicated by telephone and email with Lead Counsel  
15 concerning case developments and strategy. Lead Counsel kept me apprised of important case  
16 developments, and I provided input and direction regarding significant case decisions and events.

17 5. I received regular updates about the status of the litigation and updates on all major  
18 developments in this matter, including appointment of lead plaintiff, the preparation and filing of the  
19 initial and amended complaints, defendants' motion to dismiss, discovery, mediation, settlement  
20 negotiations, and the Settlement.

21 6. I reviewed drafts of significant filings in this matter and reviewed opinions of the  
22 Court. I searched for and produced documents evidencing my relevant transactions, in preparation  
23 for defendants' discovery requests.

24 7. With respect to the Settlement, I engaged in numerous communications with Lead  
25 Counsel in connection with settlement negotiations and the mediation in this matter, and I discussed  
26 in detail with Lead Counsel the potential damages reasonably achievable in this action and the risks  
27 and benefits of proceeding with litigation or settling this matter.

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1           8.       After weighing the merits of the case against the risks and uncertainties of continued  
2 litigation, I authorized Lead Counsel to settle this action for \$15,950,000. I believe the Settlement is  
3 fair and reasonable, represents an excellent recovery for the Class, and is in the best interests of the  
4 Class. Therefore, I fully support the proposed Settlement.

5           9.       While I recognize that any award of attorneys' fees and expenses will be decided by  
6 the Court, I believe that Lead Counsel's request for a fee of 30% of the Settlement Amount and  
7 expenses not to exceed \$200,000 is fair, reasonable, and appropriate given the facts and  
8 circumstances of this case, including the quality of Lead Counsel's representation and the work  
9 performed by Lead Counsel. I believe the Settlement would not have been possible without Lead  
10 Counsel's diligent prosecution of this case on behalf of the Class. Accordingly, I fully support Lead  
11 Counsel's fee and expense requests.

12          10.       I also support the Plan of Allocation, which distributes Settlement proceeds on a pro  
13 rata basis to Class Members, as fair and reasonable.

14          11.       I invested approximately 33 total hours on behalf of the Class in connection with the  
15 prosecution of this action, which I otherwise would have used to pursue other business endeavors.  
16 This time included monitoring and participating in the litigation, reviewing court filings, gathering  
17 and providing documents, participating in numerous discussions about litigation and settlement  
18 strategy, and undertaking the other various activities requested by Lead Counsel. I respectfully  
19 submit that this time was of significant value to my fellow Class Members.

20          12.       I respectfully submit that an award of \$8,250 is reasonable and appropriate. This  
21 amount reflects a modest rate of \$250/hour, which is substantially less than I typically earn per hour.

22          13.       I respectfully request that the Court grant final approval of the Settlement, approve  
23 Lead Counsel's motion for an award of attorneys' fees and expenses, approve the Plan of Allocation,  
24 and award me \$8,250 for the time I expended in representing the Class in this action.

25               I declare under the penalty of perjury that the foregoing is true and correct. Executed on this  
26 12th day of September, 2025.

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JOHN T. MCGANN