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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

) SUPPLEMENTAL DECLARATION OF
) ROSS D. MURRAY REGARDING: (A)
) CONTINUED DISSEMINATION OF
) NOTICE; (B) UPDATE ON CALL CENTER
) SERVICES AND WEBSITE; AND (C)
) REQUESTS FOR EXCLUSION RECEIVED
) TO DATE

1 I, ROSS D. MURRAY, declare and state as follows:

2 1. I am employed as a Vice President of Securities by Verita Global, located at 1
3 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court's June 16, 2025 Order
4 Preliminarily Approving Settlement and Providing for Notice (ECF 138) (the "Notice Order"),
5 Verita Global was appointed as the Claims Administrator in connection with the proposed
6 Settlement of the above-captioned litigation (the "Litigation").¹ I oversaw the notice services that
7 Verita Global provided in accordance with the Notice Order.

8 2. I submit this declaration as a supplement to my previously filed declaration, the
9 Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for
10 Exclusion Received to Date (ECF 139-3) (the "Initial Mailing Declaration"). The following
11 statements are based on my personal knowledge and information provided to me by other Verita
12 Global employees, and, if called as a witness, I could and would testify competently thereto.

13 **CONTINUED DISSEMINATION OF NOTICE**

14 3. As more fully detailed in the Initial Mailing Declaration, as of September 12, 2025,
15 Verita Global had mailed or emailed a total of 39,414 Postcard Notices and four copies of the
16 Notice of Pendency and Proposed Settlement of Class Action (the "Notice") and Proof of Claim
17 and Release form (the "Proof of Claim") (collectively, the "Claim Package") to potential Class
18 Members and their nominees. In addition, one institution reported that they anticipated sending
19 Postcard Notices via email to 14,370 potential Class Members. *See* Initial Mailing Declaration,
20 ¶11.

21 4. Since September 12, 2025, Verita Global has mailed or emailed an additional 334
22 Postcard Notices and one Claim package in response to requests from potential Class Members,
23 brokers, and nominees and as a result of mail returned as undeliverable for which new addresses
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27 ¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed
28 to them in the Stipulation of Settlement dated May 9, 2025 (ECF 131) (the "Stipulation"), which
is available on the website established for the Settlement at
www.SpectrumPharmaceuticalsSecuritiesSettlement.com.

1 were identified and re-mailed to those new addresses.² Therefore, as of October 8, 2025, Verita
2 Global has mailed or emailed a total of 39,748 Postcard Notices and five Claim Packages to
3 potential Class Members and nominees.

4 **UPDATE ON CALL CENTER SERVICES AND SETTLEMENT WEBSITE**

5 5. Verita Global continues to maintain the toll-free telephone number (1-833-586-
6 3555) to accommodate inquiries about the Settlement from potential Class Members. Verita
7 Global also monitors the case-dedicated e-mail address,
8 info@SpectrumPharmaceuticalsSecuritiesSettlement.com. Verita Global endeavors to respond
9 timely to each telephone and e-mail inquiry and will continue to respond to Class Member inquiries
10 via the toll-free telephone number and case dedicated e-mail address until the conclusion of the
11 administration.

12 6. Verita Global also continues to maintain the website dedicated to the Settlement,
13 www.SpectrumPharmaceuticalsSecuritiesSettlement.com (the “Settlement Website”), to assist
14 potential Class Members. Following Lead Counsel’s filing of their briefing in support of the
15 Settlement on September 15, 2025, Verita Global posted to the Settlement Website copies of the
16 papers in support of the Motion for Final Approval of the Proposed Settlement and Approval of
17 the Plan of Allocation and the Motion for an Award of Attorneys’ Fees and Expenses and an Award
18 to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4). Verita Global will continue operating,
19 maintaining and, as appropriate, updating the Settlement Website until the conclusion of the
20 administration of this Settlement.

21 **REQUESTS FOR EXCLUSION AND OBJECTIONS RECEIVED TO DATE**

22 7. Pursuant to the Notice Order, the Notice and Settlement Website informed potential
23 Class Members that written requests for exclusion from the Class were to be mailed to Verita
24 Global, postmarked or received no later than September 29, 2025. At the time of the Initial Mailing
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27 ² Verita Global has re-mailed a total of 107 Postcard Notices to persons whose original mailings
28 were returned by the United States Postal Service (“USPS”) and for whom updated addresses were
provided to Verita Global by the USPS or were obtained through other means.

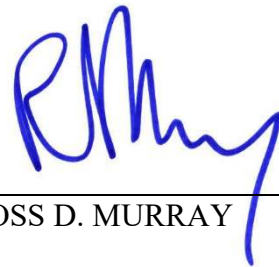
1 Declaration, Verita Global reported that it had received one request for exclusion. *See* Initial
2 Mailing Declaration, ¶16.

3 8. Since the Initial Mailing Declaration was executed, and as of the date of this
4 declaration, Verita Global has not received any additional requests for exclusion.

5 9. Although the Notice Order (and the Notice) provides that Class Members who wish
6 to file objections must file them with the Court and copy them to relevant counsel (rather than to
7 Verita Global), I also note for the sake of completeness that as of the date of this declaration Verita
8 Global has not received any objections.

9 I declare under penalty of perjury that the foregoing is true and correct and that this
10 declaration was executed this 10th day of October, 2025, at San Rafael, California.

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ROSS D. MURRAY