

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE ROMEO POWER INC.
SECURITIES LITIGATION

Case No. 1:21-cv-03362-LGS

**SUPPLEMENTAL DECLARATION OF MELISSA MEJIA REGARDING: (A)
MAILING OF THE POSTCARD NOTICE; (B) REPORT ON CLAIMS RECEIVED TO
DATE; AND (C) REPORT ON REQUESTS FOR EXCLUSION RECEIVED TO DATE**

I, Melissa Mejia, hereby declare under penalty of perjury as follows:

1. I am a Senior Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”).¹ Pursuant to the Court’s January 30, 2024, Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 197) (the “Preliminary Approval Order”), Epiq was authorized to act as the Claims Administrator in connection with the proposed Settlement of the above-captioned action (the “Action”). The following statements are based on my personal knowledge and information provided by other Epiq employees working under my supervision and, if called on to do so, I could and would testify competently thereto.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Melissa Mejia Regarding: (A) Mailing of the Postcard Notice; (B) Publication of the Summary Notice; (C) Report on Claims Received to Date; and Report on Requests for Exclusions Received to Date, dated May 29, 2024 (the “Initial Mailing Declaration”).

3. Since the execution of the Initial Mailing Declaration, Epiq has continued to disseminate copies of the Postcard Notice in response to requests from potential Settlement Class Members, brokers, and other nominees. Through July 14, 2024, Epiq has disseminated a total of 245,010 Postcard Notices to potential Settlement Class Members and nominees.

4. Epiq has also continued to disseminate copies of the Notice of (I) Pendency of Class Action and Proposed Settlement; (II) Settlement Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (the “Notice”) and Proof of Claim Forms, where requested by potential Settlement Class Members. Through July 14, 2024, Epiq has mailed 200 Notices and Proof of Claim Forms.

¹ Unless otherwise defined in this declaration, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement, dated December 7, 2023 (“Stipulation”), and previously filed with the Court. *See* ECF No. 191-1.

5. Accordingly, not including the 6,833 Postcard Notices that remain undeliverable despite attempts to obtain updated mailing addresses (*see* Initial Mailing Declaration, ¶¶8-9), as of July 14, 2024, a total of 238,377 Postcard Notices and Notices and Proof of Claim Forms have been disseminated to potential Settlement Class Members and nominees by first-class mail.

6. At the request of Lead Counsel, shortly after their filing with the Court on June 5, 2024, Epiq posted downloadable copies of the following documents on the Settlement Website: (a) Notice of Motion and Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation (ECF No. 200); (b) Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation (ECF No. 201); (c) Notice of Motion and Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (ECF No. 202); (d) Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (ECF No. 203); and (e) Declaration of Gregory B. Linkh in Support of: (I) Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses (ECF No. 204).

REQUESTS FOR EXCLUSIONS AND OBJECTIONS

7. The Postcard Notice, Notice, Settlement Website, and Summary Notice all informed potential Settlement Class Members that requests for exclusion are to be sent to the Claims Administrator, such that they are received by Epiq no later than June 19, 2024. On June 11, 2024, the Court ordered an adjournment of the final Settlement Hearing. ECF No. 205. The adjournment extended the deadline to request exclusion from June 19, 2024, to July 3, 2024. This change was posted to the Settlement Website (<https://romeopowersecuritysettlement.com/>), as was the Court's Order. Since the execution of the Mailing Declaration, Epiq has received two

additional exclusion requests. Thus, Epiq has received a total of three requests for exclusion. Copies of the three requests for exclusion are attached hereto as Exhibit A.

8. The adjourned final Settlement Hearing also extended the deadline for Settlement Class Members to object to the proposed Settlement, the proposed Plan of Allocation, or the request for attorneys' fees and reimbursement of Litigation Expenses. This change was also reflected on the Settlement Website. As of the date of this Declaration, Epiq has not received any objections and is not aware of any objections being filed with the Court.

CLAIMS RECEIVED TO DATE

9. As of July 14, 2024, Epiq has received 31,873 Claims. Of these, approximately 27,270 Claims were filed electronically by or on behalf of institutions and approximately 4,603 Claims were submitted by or on behalf of individuals. The Postcard Notice directed all Claims to be received by May 29, 2024, and as is typical, a significant number of Claims came in close to the claim filing deadline. In particular, the majority of institutional investors, brokers, and nominees typically file Claims electronically at or near the claims deadline. Now that the claim filing deadline has passed, the Claims received, both before and after the claim filing deadline, will be subject to a comprehensive review under Epiq's standard claims-processing procedures, which will identify any deficiencies in the Claims received. Epiq will then communicate with Claimants with deficient, but correctable, Claims to give Settlement Class Members the opportunity to bring those Claims into compliance. For example, some Claims may be missing documentation that, if submitted, will make them eligible for payment.

10. Based on our preliminary review of the 31,873 Claims, 13,770 Claims are considered valid, 17,944 Claims are considered invalid, and 159 Claims are currently pending. Based on previous experience, it is highly likely that the number of valid Claims will increase after the claimants have had the opportunity to correct deficiencies.

11. Of the Claims that have been processed to date, the valid Claims have a preliminary total Recognized Loss of \$90,565,585.02. This loss figure is subject to change after Epiq has completed its validation, quality assurance, and fraud prevention reviews.

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 on July 15, 2024, at New York, New York.

Melissa Mejia
Melissa Mejia

EXHIBIT A

Romeo Power Inc._Exclusion Request No. 1

REQUESTS EXCLUSION FROM THE SETTLEMENT CLASS

In re Romeo Power Inc.
Securities Litigation, Case No. 1:21-cv-03362

By signing and returning this form, I confirm that I do not want to be included in the Settlement of the class action lawsuit referenced above.

I understand that by opting out, I am giving up my right to receive any payments under the settlement.

By providing the following information, I affirm that I want to opt-out of this class:


Francisco E Parodi Gonzalez
First Name Middle Initial Last Name

Former Name (if any): First Middle Initial Last Name

[Redacted] [Redacted] [Redacted] [Redacted]
Current Mailing Address City State Zip

[Redacted] [Redacted]
Home Phone Number Work/Other Phone Number

[Redacted]
Last 4 digits of your Social Security Number


(Sign Here)

04/29/2024
(Date)

History of Owning Romeo Power Inc Common Class A stock (RMO) during period 10/5/2020 - 08/16/2021

Total number of Common Class A stock of RMO at the end of the period 04/01/2021-04/30/2021: 103

- 1) Stock Symbol: RMO
Trade date: 04/07/2021
Securities Purchased: 04/09/2021
Number of Shares: 39
Price: \$11.495 per share
- 2) Stock Symbol: RMO
Trade date: 04/08/2021
Securities Purchased: 04/12/2021
Number of Shares: 5
Price: \$10.40 per share
- 3) Stock Symbol: RMO
Trade date: 04/09/2021
Securities Purchased: 04/13/2021
Number of Shares: 7
Price: \$10.13 per share
- 4) Stock Symbol: RMO
Trade date: 04/12/2021
Securities Purchased: 04/14/2021
Number of Shares: 10
Price: \$9.30 per share
- 5) Stock Symbol: RMO
Trade date: 04/27/2021
Securities Purchased: 04/29/2021
Number of Shares: 22
Price: \$9.1695 per share
- 6) Stock Symbol: RMO
Trade date: 04/28/2021
Securities Purchased: 04/30/2021
Number of Shares: 17
Price: \$9.08 per share
- 7) Stock Symbol: RMO
Trade date: 04/28/2021
Securities Purchased: 04/30/2021
Number of Shares: 3
Price: \$9.0551 per share

History of Owning Romeo Power Inc Common Class A stock (RMO) during period 10/5/2020 - 08/16/2021

Total number of Common Class A stock of RMO at the end of the period 05/01/2021-05/31/2021: 160

- 1) Stock Symbol: RMO
Trade date: 04/29/2021
Securities Purchased: 05/03/2021
Number of Shares: 54
Price: \$9.23 per share

- 2) Stock Symbol: RMO
Trade date: 05/10/2021
Securities Purchased: 05/12/2021
Number of Shares: 3
Price: \$7.18 per share

History of Owning Romeo Power Inc Common Class A stock (RMO) during period 10/5/2020 - 08/16/2021

Total number of Common Class A stock of RMO at end of the period 06/01/2021-06/30/2021: 0

- 1) Stock Symbol: RMO
Trade date: 06/02/2021
Securities Purchased: 06/04/2021
Number of Shares: 11
Price: \$8.7299 per share
- 2) Stock Symbol: RMO
Trade date: 06/02/2021
Securities Purchased: 06/04/2021
Number of Shares: 3
Price: \$8.78 per share
- 3) Stock Symbol: RMO
Trade date: 06/02/2021
Securities Sold: 06/04/2021
Number of Shares: 172
Price: \$9.06 per share
- 4) Stock Symbol: RMO
Trade date: 06/02/2021
Securities Sold: 06/04/2021
Number of Shares: 2
Price: \$9.1601 per share

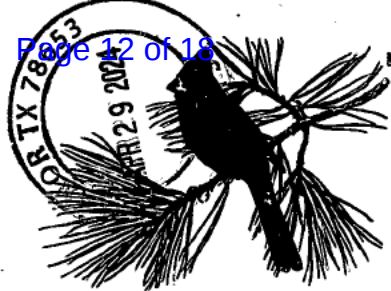
Francisco Parodi Gonzalez

Case 1:21-cv-03362-LGS

Document 206-1

Filed 07/17/24

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FOREVER / USA

In. re Romeo Power Inc.
Securities Litigation, EXCLUSIONS,
c/o Epiq Systems, INC., PO Box 3719
Portland, OR 97208-3719

Romeo Power Inc._Exclusion Request No. 2

May 23, 2024

In re Romeo Power Inc. Securities Litigation

EXCLUSIONS

c/o Epiq Systems, Inc.

PO Box 3719

Portland, OR 97208-3719

RE: Request for Exclusion from the Settlement Class in *In re Romeo Power Inc. Securities Litigation*, Case No. 1:21-cv-03362

To Whom It May Concern,

This is a written Request for Exclusion from Settlement Class for myself, Joshua Mayer of [REDACTED] (Phone number [REDACTED]).

I, Joshua Mayer, request Exclusion from the Settlement Class in *In re Romeo Power, Inc. Securities Litigation*, Case No. 1:21-cv-03362. Below is the list of shares purchased, acquired, and sold during the Settlement Class Period (between October 5, 2020 and August 16, 2021) that I am requesting for exclusion. Attached is a list of the transactions.

ROMEO POWER INC CLA (RMO) (1 Security, 4 Lots)

Sell Date	Units	Purchased	Original Cost	Cost Basis	Proceeds	ST Gain/Loss	LT Gain/Loss
07/13/2021	1	02/03/2021	\$18.84	\$18.84	\$7.11	\$-11.73	None
07/13/2021	1	02/16/2021	\$16.73	\$16.73	\$7.11	\$-9.62	None
07/13/2021	1	02/24/2021	\$12.63	\$12.63	\$7.11	\$-5.52	None
07/13/2021	7	04/01/2021	\$58.31	\$58.31	\$49.77	\$-8.54	None
Total	10		\$106.51	\$106.51	\$71.10	\$-35.41	None

Please contact me if you need additional information.

Sincerely,



Joshua Mayer



Realized Sell Activity

Summary Details Period: Custom date From: 1/1/2013 To: 5/23/2024 Section 6045g: All Security Type: All Security ID: Symbol RMO

Realized Sale Activity Details 1/1/2013 - 5/23/2024 Created: 5/23/2024 5:25:38 PM

Security	Security Name Symbol	Units	Purchased	Orig Cost	WS Adj	Cost Basis	Proceeds	G/L Adj	ST Gain/Loss	LT Gain/Loss	% Change	Trading method	Status
	ROMEO POWER INC CL A (RMO)	10		\$106.51		\$106.51	\$71.10		\$-35.41		-33.25%		
07/13/2021		1	02/03/2021	\$18.84		\$18.84	\$7.11		\$-11.73		-62.26%	lossharvest	C
07/13/2021		1	02/16/2021	\$16.73		\$16.73	\$7.11		\$-9.62		-57.50%	lossharvest	C
07/13/2021		1	02/24/2021	\$12.63		\$12.63	\$7.11		\$-5.52		-43.71%	lossharvest	C
07/13/2021		7	04/01/2021	\$58.31		\$58.31	\$49.77		\$-8.54		-14.65%	lossharvest	C
TOTAL (1 security, 4 lots)				\$106.51		\$106.51	\$71.10		\$-35.41		-33.25%		

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**Important Disclaimer: We are providing access to your historical Realized Gain/Loss information as of the date your account(a) was transitioned from TD Ameritrade to Charles Schwab & Co., Inc. ("Schwab") The information contained here reflects gain/loss information at TD Ameritrade only.

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0223-25NJ

Romeo Power Inc._Exclusion Request
No. 3

In re Romeo Power Inc. Securities Litigation
c/o Epiq Systems, Inc.
PO Box 3719
Portland, OR 97208-3719

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

JOB#N08991-010

00022556



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06

COURT-ORDERED LEGAL NOTICE

**Important Notice about a Securities Class
Action Settlement.**

**You may be entitled to a CASH payment.
This Notice may affect your legal rights.
Please read it carefully.**

In re Romeo Power Inc. Securities Litigation
Case No. 1:21-cv-03362-LGS.



*****AUTO**ALL FOR AADC 320
FMTC CUSTODIAN - ROTH IRA
FBO PAUL P TAM



06

AS-IS

Document Control

April 27, 2024

RE: Written Request For Exclusion
Case No. 1:21-cv-03362-LGS

To Whom It May Concern:

Please be advise I, Paul P Tam submit this letter of Written Request to exclude myself from the above case. Therefore, I understand by excluded myself which I will not be legally bound by the Settlement. Thank you.

Best Regards,
Paul P Tam

T Paul Tam
[Redacted]

JACKSONVILLE FL 320

1 MAY 2024 PM 3 L



IN RE ROMEO POWER INC. SECURITIES LITIGATION

c/o EPIQ SYSTEMS, INC

P.O. BOX 3719

PORTLAND, OR 97208-3719

97208-371919

