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11 *Counsel for Plaintiff and the Class*

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
14 SOUTHERN DIVISION

15 HSINGCHING HSU, Individually and  
16 on Behalf of All Others Similarly  
Situated,

17 Plaintiff,

18 vs.

19 PUMA BIOTECHNOLOGY, INC., et  
20 al.,

21 Defendants.

Case No. 8:15-cv-00865-DOC-SHK

CLASS ACTION

DECLARATION OF TOR  
GRONBORG IN SUPPORT OF LEAD  
PLAINTIFF'S MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND APPROVAL OF  
PLAN OF ALLOCATION, AN  
AWARD OF ATTORNEYS' FEES  
AND EXPENSES, AND AN AWARD  
TO LEAD PLAINTIFF PURSUANT  
TO 15 U.S.C. §78u-4(a)(4)

DATE: April 11, 2022  
TIME: 8:00 a.m.  
CTRM: 9D  
JUDGE: Hon. David O. Carter

1 I, TOR GRONBORG, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the  
3 State of California, and I am admitted to practice before this Court. I am a partner of  
4 the firm of Robbins Geller Rudman & Dowd LLP (“Robbins Geller” or “Lead  
5 Counsel”), counsel for Lead Plaintiff Norfolk County Council, as Administering  
6 Authority of the Norfolk Pension Fund (“Lead Plaintiff” or “Norfolk”), and the Class  
7 in the above-entitled action (the “Litigation”). I have been actively involved in the  
8 prosecution and resolution of this action, am familiar with its proceedings, and have  
9 personal knowledge of the matters set forth herein based on my active supervision and  
10 participation in all material aspects of this Litigation.

11 2. I submit this Declaration in support of Lead Plaintiff’s motion, pursuant  
12 to Rule 23 of the Federal Rules of Civil Procedure, for approval of: (a) the Stipulation  
13 and Agreement of Class Action Settlement dated December 1, 2021 (the  
14 “Stipulation”) (*see* ECF No. 889),<sup>1</sup> which provides for a cash settlement of  
15 \$54,248,374.00 (the “Settlement Amount”); (b) the proposed Plan of Allocation; (c)  
16 Lead Counsel’s application for an award of attorneys’ fees and expenses; and (d) an  
17 award to Lead Plaintiff pursuant to 15 U.S.C. §78u-4(a)(4) in connection with its  
18 representation of the Class.

19 3. In addition to this Declaration, the relevant facts and allegations are set  
20 forth in Lead Plaintiff’s concurrently filed Memorandum of Points and Authorities in  
21 Support of Lead Plaintiff’s Motion for Final Approval of Class Action Settlement and  
22 Approval of Plan of Allocation, an Award of Attorneys’ Fees and Expenses, and an  
23 Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4) (“Final Approval Brief”),  
24 as well as in this Court’s prior rulings.

25  
26  
27 <sup>1</sup> Unless otherwise defined herein, all capitalized terms have the meanings  
28 ascribed to them in the Stipulation.

1 **I. PRELIMINARY STATEMENT**

2 4. This case was initiated in June 2015, and has been zealously litigated by  
3 the parties for nearly seven years. Following a jury trial and verdict in favor of Lead  
4 Plaintiff and the Class in February 2019, and an extensive and highly-contested post-  
5 trial claims process, the parties ultimately agreed to the final terms of the Settlement  
6 in December 2021. The \$54,248,374.00 Settlement Amount represents 100% of the  
7 damages (including prejudgment interest) of the validated claims, and is the product  
8 of good-faith, arm's-length negotiations between experienced counsel. The  
9 Settlement is in the best interest of the Class, as it provides an immediate and total  
10 recovery of the per-share damages awarded by the jury, without the delay of continued  
11 litigation, including post-trial motions and appeals threatened by Defendants.

12 5. The fee application for 25% of the Settlement Amount is also fair to both  
13 the Class and Lead Counsel, and is the benchmark rate for class action fee awards in  
14 the Ninth Circuit. Lead Counsel prosecuted the Litigation on a wholly contingent  
15 basis, advanced or incurred all litigation expenses, and has not yet received any  
16 compensation for its years-long and successful effort. Also, as permitted by the  
17 PSLRA, Norfolk seeks an award of \$64,505 pursuant to 15 U.S.C. §78u-4(a)(4) for its  
18 investment of time and effort in directly representing the Class. The successful result  
19 of this Litigation would not have been possible without its effort.

20 **II. THE LITIGATION**

21 6. The initial complaint in this action was filed on June 3, 2015. Judge  
22 Andrew J. Guilford appointed Norfolk as Lead Plaintiff and Robbins Geller as Lead  
23 Counsel in August 2015. ECF No. 55. Following the filing of a consolidated class  
24 action complaint (ECF No. 58), the parties briefed Defendants' motion to dismiss.  
25 (ECF Nos. 60, 64, 68.) On September 30, 2016, Judge Guilford denied Defendants'  
26 motion to dismiss in its entirety. ECF No. 76.

27 7. Over the course of approximately 18 months of fact and expert discovery,  
28 the parties engaged in extensive document discovery and conducted 43 depositions of

1 various party, third-party, and expert witnesses. The Class was certified on December  
2 8, 2017. ECF No. 218. The parties briefed summary judgment motions in the  
3 Summer and Fall of 2018 (ECF Nos. 367, 372, 419, 428, 464, 468), and the Court’s  
4 order on these motions was issued on October 5, 2018 (ECF No. 557).

5 8. A two week jury trial began on January 15, 2019. On February 4, 2019,  
6 the jury returned a verdict against Defendants as to statements about the efficacy of  
7 Puma’s drug, neratinib, in violation of §§10(b) and 20(a) of the Securities Exchange  
8 Act of 1934, and found that Defendants knowingly violated the federal securities laws.  
9 ECF No. 718. The jury awarded damages of \$4.50 per share for shares purchased  
10 between July 22, 2014 and May 13, 2015. *Id.*

11 9. Following the jury verdict, the parties engaged in an extensive post-trial  
12 claims process, ultimately resulting in Lead Plaintiff’s submission of a proposed  
13 judgment on September 20, 2021. *See* ECF Nos. 864, 879 (the “Judgment”). That  
14 Judgment identified 4,455 validated claimants, with total claimed damages, including  
15 prejudgment interest, of \$54,248,374.00. While the motion for entry of judgment was  
16 pending, and after multiple years of formal and informal settlement negotiations  
17 (including through the use of a private mediator), the parties reached an agreement to  
18 settle the Litigation for the total amount of claimed damages and prejudgment interest.

### 19 **III. THE SETTLEMENT AND PLAN OF ALLOCATION**

20 10. The \$54,248,374.00 cash Settlement is a very favorable result, and  
21 represents 100% of the total claimed damages from the validated claimants, plus  
22 prejudgment interest. Given that this represents the maximum allowable damages  
23 pursuant to the jury’s per-share damages award, there is no additional benefit to be  
24 gained from continued litigation. The Settlement provides an immediate recovery  
25 without the risks, uncertainties, and delay of the post-trial motions and appeals that  
26 would result from continued litigation. Based on their seven years of litigation in this  
27 case and extensive experience prosecuting securities fraud class actions, Lead Counsel  
28

1 have determined that the Settlement is fair, reasonable, and in the best interest of the  
2 Class.

3 11. Claims have already been submitted, processed, and validated in  
4 accordance with the Court-approved damages formula. *See* ECF No. 778. Moreover,  
5 because all validated claimants have been identified, the distribution of funds is  
6 extremely straightforward. Following final approval of the Settlement and resolution  
7 of Lead Counsel’s request for an award of attorneys’ fees and expenses, Lead  
8 Plaintiff’s 15 U.S.C. §78u-4(a)(4) award, and objections, if any, and in accordance  
9 with the timing set forth in the Stipulation, the Claims Administrator will only need to  
10 distribute to validated claimants their calculated damages and prejudgment interest,  
11 less any awarded fees and expenses (which will be deducted on a *pro rata* basis).

12 **IV. LEAD COUNSEL’S REQUEST FOR AN AWARD OF**  
13 **ATTORNEYS’ FEES AND EXPENSES AND LEAD PLAINTIFF**  
14 **AWARD**

15 12. The successful prosecution of this Litigation required Lead Counsel and  
16 their para-professionals to perform thousands of hours of work and incur  
17 \$2,890,129.74 in expenses, as detailed in the accompanying Declaration of Tor  
18 Gronborg Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of  
19 Application for Award of Attorneys’ Fees and Expenses (“Fee Decl.”). *See* Fee Decl.,  
20 ¶¶4-5, Ex. A.

21 13. Based on the extensive efforts on behalf of the Class and the substantial  
22 benefit conferred to the Class with the Settlement, Lead Counsel is applying for  
23 compensation from the Settlement Fund on a percentage basis, and is requesting an  
24 award of attorneys’ fees in the amount of 25% of the Settlement Amount. In light of  
25 the extent of the Litigation, Lead Counsel’s diligent prosecution of the Litigation, the  
26 complexity of the factual and legal issues presented, the risk of non-payment  
27 undertaken by Lead Counsel, and the other factors described in the accompanying  
28 Final Approval Brief, Lead Plaintiff and Lead Counsel believe that the requested fee

1 of 25% of the Settlement Amount is fair and reasonable. Indeed, the Ninth Circuit’s  
2 benchmark for presumptively reasonable fees in class action litigation is 25%.

3 14. A 25% fee award is justified by the specific facts and circumstances in  
4 this case and the substantial risks that Lead Plaintiff had to overcome at the pleadings,  
5 class certification, discovery, summary judgment, trial, and post-trial claims process.  
6 The \$54,248,374.00 million cash settlement was achieved as a result of extensive and  
7 creative prosecutorial efforts, contentious and complicated motions, approximately 18  
8 months of hard-fought discovery, analysis of voluminous evidence, dozens of  
9 depositions, and ultimately a win at trial. Importantly, the fee request has been  
10 approved by Lead Plaintiff.

11 15. This Litigation was prosecuted by Lead Counsel on an “at-risk”  
12 contingent-fee basis. Lead Counsel fully assumed the risk of an unsuccessful result.  
13 It has received no compensation for its services during the course of this Litigation  
14 and has incurred significant expenses in litigating for the benefit of the Class.  
15 Because the fee to be awarded in this matter is entirely contingent, the only certainty  
16 from the outset was that there would be no fee without a successful result, and that  
17 such a result would be realized only after a lengthy and difficult effort.

18 16. This Litigation could not have been successfully prosecuted without the  
19 substantial participation and assistance of Lead Plaintiff Norfolk, which expended  
20 substantial time over the course of six years monitoring the Litigation, consulting with  
21 Lead Counsel regarding case developments, participating in discovery, and attending  
22 and testifying at trial. The time spent by Lead Plaintiff in doing so, as reflected in the  
23 accompanying Declaration of Alexander Younger in Support of Settlement, submitted  
24 contemporaneously herewith, was reasonable and necessary to the prosecution of this  
25 case. As such, Lead Plaintiff’s request for \$64,505 pursuant to 15 U.S.C. §78u-  
26 4(a)(4) in connection with its representation of the Class is reasonable and should be  
27 granted.

28

1 **V. CONCLUSION**

2 17. As described above and in the Final Approval Brief, the Court should  
3 approve the Settlement and Plan of Allocation, award Lead Counsel a fee of 25% of  
4 the Settlement Amount and \$2,890,129.74 in litigation expenses and charges, and  
5 award Lead Plaintiff \$64,505 pursuant to 15 U.S.C. §78u-4(a)(4) for its time and  
6 effort representing the Class.

7 I declare under penalty of perjury under the laws of the United States that the  
8 foregoing is true and correct to the best of my knowledge and belief, and that this  
9 declaration was executed this 7th day of March, 2022, in San Diego, California.

10  
11 s/ Tor Gronborg  
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13 TOR GRONBORG  
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on March 7, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Tor Gronborg

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**Mailing Information for a Case 8:15-cv-00865-DOC-SHK HsingChing Hsu v. Puma Biotechnology, Inc. et al****Electronic Mail Notice List**

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# Responses, Replies and Other Motion Related Documents

[8:15-cv-00865-DOC-SHK HsingChing Hsu v. Puma Biotechnology, Inc. et al](#)

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

## Notice of Electronic Filing

The following transaction was entered by Gronborg, Tor on 3/7/2022 at 1:07 PM PST and filed on 3/7/2022

**Case Name:** HsingChing Hsu v. Puma Biotechnology, Inc. et al

**Case Number:** [8:15-cv-00865-DOC-SHK](#)

**Filer:** Norfolk County Council, as Administering Authority of the Norfolk Pension Fund

**Document Number:** [898](#)

### Docket Text:

**DECLARATION of Tor Gronborg in support of NOTICE OF MOTION AND MOTION for Settlement Approval of Final Approval of Class Action Settlement and Approval of Plan of Allocation NOTICE OF MOTION AND MOTION for Attorney Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4)[896] filed by Plaintiff Norfolk County Council, as Administering Authority of the Norfolk Pension Fund. (Gronborg, Tor)**

### 8:15-cv-00865-DOC-SHK Notice has been electronically mailed to:

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4c681f20e7c6c14d27ddf0b4795480eaded024cf1301c8dcab50e1621d85]]