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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE TERRAVIA HOLDINGS, INC.,  
SECURITIES LITIGATION

Case No. 3:16-cv-06633-JD

CLASS ACTION

**PLAINTIFFS’ MOTION FOR CLASS  
CERTIFICATION**

Date: August 20, 2020  
Time: 10:00 a.m.  
Before: Hon. James Donato  
Courtroom: 11, 19<sup>th</sup> Fl.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

**PLEASE TAKE NOTICE** that on August 20, 2020 at 10:00 a.m. before the Honorable James Donato in Courtroom 11 – 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, proposed Class Representatives Casey Minnick (“Minnick”) and Reuben Perales (“Perales”) (collectively, the “Plaintiffs”) through their counsel, will, and do move this Court for an Order, pursuant to Fed. R. Civ. P. 23(a), 23(b)(3), and 23(g), for an Order:

1. Certifying the following class (the “Class”):  
all persons other than Defendants who purchased or otherwise acquired TerraVia Holdings, Inc. (“TerraVia”) securities between May 4, 2016 and November 6, 2016,

1 both dates inclusive (the “Class Period”), seeking to recover compensable damages  
2 caused by Defendants’ violations of the federal securities laws and to pursue remedies  
3 under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange  
4 Act”) and Rule 10b-5 promulgated thereunder;

- 5 2. Appointing Plaintiffs as class representatives;
- 6 3. Appointing their counsel of choice, Pomerantz LLP (“Pomerantz”); and
- 7 4. Granting such other and further relief the Court may deem just and proper.

8 Class certification and the appointment of Plaintiffs as Class Representatives are proper,  
9 where, as here, the Class is so numerous that joinder of all members is impracticable, common  
10 question of law and fact exist, Plaintiffs’ claims are typical of the Class claims, Plaintiffs and their  
11 counsel will fairly and adequately represent the Class, common questions predominate, and a class  
12 action is superior to individual actions. Additionally, the appointment of Class Counsel is proper,  
13 where, as here, counsel is well qualified to represent the Class.

14 This Motion is made pursuant to the Court’s Order entered on May 1, 2020 (ECF No. 88).  
15 The Motion is based on this Notice of Motion, the accompanying Memorandum of Points and  
16 Authorities, the Declaration of Louis C. Ludwig and exhibits thereto, the pleadings and other filings  
17 in this matter, and other evidence and argument that may be presented prior to the Court’s decision  
18 on this Motion.

19 Dated: May 12, 2020

20 Respectfully submitted,

21 **POMERANTZ LLP**

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*Proposed Class Counsel*

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