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14		DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION		
16 17	In re RIPPLE LABS, INC. LITIGATION	Case No. 4:18-cv-06753-PJH (RMI) Formerly Consolidated/Related Case No. 4:21-cv-06518 (Closed 9-27-21)	
18		CLASS ACTION	
19	This Document Relates to:	NOTICE OF MOTION AND MOTION	
2021	All Actions	FOR CLASS CERTIFICATION; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT	
22		DATE: April 26, 2023	
23		TIME: 1:30 p.m. PLACE: 1301 Clay St., Oakland, CA 94612	
24		Courtroom 3 JUDGE: Hon. Phyllis J. Hamilton	
25		Consolidated First Amended Complaint Filed: March 25, 2020	
26		FILED UNDER SEAL	
27		REDACTED	



NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that on April 26, 2023 at 1:30 p.m., in the courtroom of the Honorable Phyllis J. Hamilton, United States District Judge, Northern District of California, located at 1301 Clay Street, Oakland, CA 94612, Courtroom 3, Lead Plaintiff Bradley Sostack will move the Court for certification of two classes pursuant to Rule 23 of the Federal Rules of Civil Procedure:

- Federal Securities Claims Class: All persons or entities who purchased XRP from May 3, 2017 through the present and who have (a) retained the XRP, and/or (b) sold the XRP at a loss.
- <u>California State Securities Claims Class</u>: All persons or entities who purchased XRP from Defendants and/or from any person or entity selling XRP on Defendants' behalf from May 3, 2017 through the present and who have (a) retained the XRP, and/or (b) sold the XRP at a loss.

Excluded from both Classes are: Defendant Bradley Garlinghouse; corporate officers, members of the boards of directors, and senior executives of Defendants Ripple Labs, Inc. and XRP II, LLC; members of Defendants' immediate families and their legal representatives, heirs, successors or assigns; and any entity in which Defendants have or had a controlling interest.

Lead Plaintiff also requests he be appointed by the Court as the class representative and that Susman Godfrey L.L.P. and Taylor-Copeland Law be appointed as Class Counsel. The grounds for this motion are that this case meets all the requirements for class treatment as required under Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure.

The Motion is based on this Notice of Motion and supporting Memorandum of Points and Authorities, the Declaration of Nicholas N. Spear and the exhibits attached thereto, the Declaration of Lead Plaintiff Bradley Sostack and the exhibit attached thereto, the reply briefing in further



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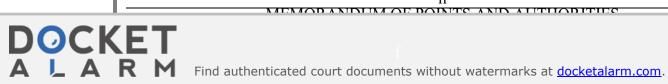
1 support of this Motion, the arguments of counsel, and any such other matters as the Court may 2 consider. 3 Dated: November 18, 2022 SUSMAN GODFREY L.L.P. 4 By /s/ Marc M. Seltzer Marc M. Seltzer (54534) 5 Steven G. Sklaver (237612) Oleg Elkhunovich (269238) 6 Krysta Kauble Pachman (280951) Nicholas N. Spear (304281) 7 SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 8 Los Angeles, CA 90067-6029 Telephone: (310) 789-3100 9 Facsimile: (310) 789-3150 mseltzer@susmangodfrey.com 10 ssklaver@susmangodfrey.com oelkhunovich@susmangodfrey.com 11 kpachman@susmangodfrey.com nspear@susmangodfrey.com 12 James Q. Taylor-Copeland (284743) 13 TAYLOR-COPELAND LAW 501 W. Broadway, Suite 800 14 San Diego, CA 92101 james@taylorcopelandlaw.com 15 Telephone: (619) 400-4944 Facsimile: (619) 566-4341 16 Counsel for Lead Plaintiff Bradley Sostack 17 18 19 20 21 22 23 24 25 26 27 28



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