

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

In re AURORA CANNABIS INC.  
SECURITIES LITIGATION

No. 2:19-cv-20588-BRM-JBC

CLASS ACTION

This Document Relates To:

ALL ACTIONS.

DECLARATION OF LUIGGY  
SEGURA REGARDING:  
(A) DISSEMINATION OF  
NOTICE;  
(B) PUBLICATION/TRANSMISSION  
OF THE SUMMARY NOTICE;  
(C) ESTABLISHMENT OF CALL  
CENTER SERVICES AND WEBSITE;  
AND (D) REQUESTS FOR  
EXCLUSION RECEIVED  
TO DATE

I, Luiggy Segura, declare as follows:

1. I am the Vice President of Securities Operations at JND Legal Administration (“JND”). Pursuant to the Court’s October 10, 2024, Order Preliminarily Approving Settlement and Providing for Notice (ECF 120) (the “Preliminary Approval Order”), JND was authorized to act as the Claims Administrator in connection with the above-captioned action (the “Action”).<sup>1</sup> I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation of Settlement, dated June 7, 2024 (ECF 112-2) (“Stipulation”).

### **DISSEMINATION OF NOTICE**

2. Pursuant to the Preliminary Approval Order, JND is responsible for disseminating notice of the Settlement. Specifically, JND mailed or emailed the Postcard Notice to Settlement Class Members and mailed the Notice of Pendency and Proposed Settlement of Class Action (“Notice”) and Proof of Claim and Release Form (“Proof of Claim,” and together with the Notice, the “Notice Packet”) to nominees and potential Settlement Class Members upon request. A copy of the Postcard Notice and Notice Packet are attached hereto as Exhibits A and B respectively.

3. On October 18, 2024, Defendants’ Counsel sent to JND data files that contained a total of 233,299 unique names and addresses of persons or entities who were identified as registered holders of Aurora common stock during the Class Period. On October 31, 2024, JND caused the Postcard Notice to be sent by first-class mail to these 233,299 potential eligible Settlement Class Members.

4. JND also researched filings with the U.S. Securities and Exchange Commission on Form 13-F to identify additional institutions or entities who may have purchased Aurora common stock on the New York Stock Exchange during the Class Period. Based on this research, 700 address records were added to the list of potential eligible Settlement Class Members. On October 31, 2024, JND caused Postcard Notices to be sent by first-class mail to these potential Settlement Class Members.

5. JND maintains a proprietary database with names and addresses of the largest and most common brokerage firms, banks, and other institutions (referred to as “nominees” or “record holders”) that purchase securities in “street name” on behalf of the beneficial owners. At the time of the initial mailing, JND’s database of nominees contained 4,076 mailing records. On October

31, 2024, JND caused Notice Packets to be sent by first-class mail to the 4,076 mailing records contained in its database.

6. The Notice mailed to nominees directed those who purchased Aurora common stock on the New York Stock Exchange during the Class Period for beneficial owners who are Settlement Class Members to: (i) request within seven (7) calendar days of receipt of the Postcard Notice sufficient copies of the Postcard Notice from the Claims Administrator to forward to all such beneficial owners; or (ii) send a list of the names and addresses (including email addresses if available) of all such beneficial owners to JND (who would then email or mail copies of the Postcard Notice to those beneficial owners).

7. As of December 19, 2024, JND has received 119,054 additional names and addresses of potential eligible Settlement Class Members from individuals or brokerage firms, banks, institutions, and other nominees. JND has also received requests from brokers and other nominee holders for 142,762 Postcard Notices to be forwarded directly by the nominees to their customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.

8. As of December 19, 2024, a total of 495,815 Postcard Notices have been disseminated to potential eligible Settlement Class Members. Further, an additional 229 Notice Packets have been disseminated to potential eligible Settlement Class Members.

#### **E-MAIL NOTICE**

9. JND uses industry-leading e-mail solutions in order to achieve the most efficient e-mail notification campaigns. Our Data Team is staffed with e-mail experts and software solution teams to tailor-make each notice program. JND provides individualized support during the program and manages our sender reputation with the Internet Service Providers (“ISPs”). For each

of our programs, we analyze the program's data and monitor the ongoing effectiveness of the notification campaign, adjusting the campaign as needed. These actions ensure the highest possible deliverability of the e-mail campaign so that more potential Settlement Class Members receive notice of the proposed Settlement.

10. Prior to sending the e-mail campaign, JND formatted the E-Mail Notice in a manner to improve e-mail deliverability. The process included running the E-mail Notice through spam testing software, URL shortening, reverse Domain Name System ("DNS") lookup, and hostname evaluation. Additionally, we checked the send domain against the 25 most common IPv4 blacklists. IPv4 refers to "Internet Protocol Version 4." IPv4 is the standard network addressing system for computer systems on the internet. IPv4 blacklists are maintained by various organizations to help in the identification of IP addresses flagged or blacklisted because of certain types of activity. During the course of any e-mail campaign, we are monitoring these blacklists for the appearance of IP addresses we are using to deliver e-mail in order to ensure that there is no impact to e-mail deliverability in the event that an IP is incorrectly blacklisted.

11. For e-mail campaigns, JND utilizes a verification program to eliminate invalid e-mail addresses and spam traps that would otherwise negatively impact deliverability. JND then reviews the list of e-mail addresses for formatting and incomplete addresses to further identify all invalid e-mail addresses. The E-mail Notice is then formatted and structured in a way that receiving servers expect, allowing the E-mail Notice to pass easily to the recipient.

12. To ensure readability of the E-mail Notice, JND formatted the content of the E-mail Notice into a structure that is applicable to all e-mail platforms. Before sending the campaign, JND e-mailed a test E-mail Notice to multiple ISPs and opened the E-mail Notice on multiple devices (iPhones, other companies' phones, desktop computers, tablets, etc.) to ensure

the E-mail Notice opened as expected. Additionally, JND added an “unsubscribe” link at the bottom of the E-mail Notice to allow Settlement Class Members to opt out of any additional E-mail Notices from JND. This step is essential to maintain JND’s good reputation among the ISPs and reduce complaints relating to the e-mail campaign.

13. On October 31, 2024, JND started the initial campaign to 22,175 verified e-mail addresses. JND sent the counsel-approved E-mail Notice, which contained the Settlement Class Member’s unique Identification Number and a link to the Settlement Website. A sample of the counsel-approved E-mail Notice is attached hereto as Exhibit C.

#### **PUBLICATION/TRANSMISSION OF THE SUMMARY NOTICE**

14. In accordance with Paragraph 10(b) of the Preliminary Approval Order, JND caused the Summary Notice to be published in *The Wall Street Journal* and transmitted over *PR Newswire* on November 7, 2024. Copies of proof of the publication/transmission of the Summary Notice in *The Wall Street Journal* and over *PR Newswire* are attached hereto as Exhibit D.

#### **ESTABLISHMENT OF SETTLEMENT WEBSITE**

15. In order to further assist potential eligible Settlement Class Members, JND established a dedicated website for the Settlement, [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com) (“Settlement Website”). The Settlement Website became operational on October 30, 2024, and is accessible 24 hours a day, 7 days a week. The address for the Settlement Website was set forth in the notices. The Settlement Website includes information regarding the Action and the proposed Settlement, including the exclusion, objection, and claim filing deadlines, and details about the Court’s Settlement Hearing. Copies of the Notice, Proof of Claim, Stipulation, and Preliminary Approval Order are posted on the Settlement Website and are available for downloading. In

addition, the Settlement Website provides Settlement Class Members with the ability to submit their Proofs of Claim online. JND will update the website as necessary through its engagement.

**ESTABLISHMENT OF CALL CENTER SERVICES**

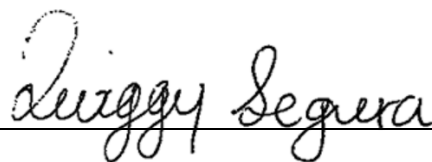
16. On October 30, 2024, JND established a case-specific, toll-free telephone number, 877-495-6308, for Settlement Class Members to call and obtain information about the Settlement. The toll-free telephone number provides callers with an interactive voice response system and live operators, to accommodate potential eligible Settlement Class Members with questions about the Action. The automated attendant answers the calls and presents callers with a series of choices to respond to basic questions. Callers requiring further help have the option to be transferred to a live operator during business hours. JND continues to maintain the telephone helpline and will update the interactive voice response system as necessary throughout the course of JND's engagement. The toll-free telephone number is set forth in the Postcard Notice, Notice, Summary Notice, and on the Settlement Website.

**REQUESTS FOR EXCLUSION RECEIVED TO DATE**

17. The Postcard Notice, Notice, and Summary Notice inform potential eligible Settlement Class Members that requests for exclusion from the Settlement Class are to be sent to JND, such that they are postmarked no later than January 6, 2025. The Notice also sets forth the information that must be included in each request for exclusion. As of December 19, 2024, JND has received ten (10) requests for exclusion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20<sup>th</sup> day of December 2024, at New Hyde Park, New York.



LUIGGY SEGURA

# EXHIBIT A

COMMERCIAL LETTER NOTICE

(Forwarding Service Requested)

4153

*In re Aurora Cannabis Inc.  
Sec. Litig.,*

No. 2:19-cv-20588-BRM-JBC (D.N.J.)

[www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com)

This notice contains important information about  
a securities class action settlement.

You may be entitled to a payment.  
This notice may affect your legal rights.

Please read this notice carefully.

*Aurora Cannabis Securities Litigation*  
c/o JND Legal Administration  
P.O. Box 91320  
Seattle, WA 98111



THIS CARD PROVIDES ONLY LIMITED INFORMATION ABOUT THE SETTLEMENT. VISIT [WWW.AURORACANNABISSECURITIESLITIGATION.COM](http://WWW.AURORACANNABISSECURITIESLITIGATION.COM) OR CALL 1-877-495-6308 FOR MORE INFORMATION.

If you purchased Aurora Cannabis Inc. (“Aurora” or the “Company”) common stock on the New York Stock Exchange between October 23, 2018 and February 28, 2020, inclusive, you could be entitled to a payment from a proposed settlement (“Settlement”) reached in the above-captioned action (“Litigation”). Your rights may be affected by this Litigation and the Settlement. A hearing will be held on January 28, 2025, at 2:00 p.m. (“Settlement Hearing”), before Judge James B. Clark, III, to determine whether the proposed Settlement of the Litigation against Defendants Aurora, Terry Booth, and Allan Cleiren for \$8.05 million and the Plan of Allocation should be approved as fair, reasonable, and adequate; whether the Litigation should be dismissed with prejudice against the Defendants, as set forth in the Stipulation of Settlement (“Stipulation”) filed with the Court; whether Lead Plaintiffs’ Counsel’s application for an award of attorneys’ fees of up to 25% of the Settlement Amount, and expenses not to exceed \$150,000, plus interest on both amounts, should be granted; and whether awards to Lead Plaintiffs in connection with their representation of the Settlement Class should be granted.

The proposed Settlement would resolve a putative class action lawsuit alleging that, in violation of the U.S. federal securities laws, Defendants materially misled investors by making materially false and misleading statements and/or omissions concerning the Company’s \$21.7 million transaction with Radient Technologies, Inc., which caused Aurora stock to trade on the New York Stock Exchange at artificially inflated prices until the nature of the alleged wrongdoing was revealed, causing Aurora’s stock price to fall. Defendants deny the allegations and any liability or wrongdoing of any kind. For a full description of the proposed Settlement and your rights, and to make a claim, you may obtain the Stipulation, long-form Notice of Pendency and Proposed Settlement of Class Action (“Notice”), and the Proof of Claim and Release (“Claim Form”) by visiting the website: [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com) (“Website”) or you may request copies from the Claims Administrator by: (i) mail: *Aurora Cannabis Securities Litigation*, c/o JND Legal Administration, P.O. Box 91320, Seattle, WA 98111, or (ii) toll-free call: 1-877-495-6308.

To qualify for payment, you must submit a valid Claim Form, with supporting documentation, postmarked or submitted online no later than February 27, 2025. You will be bound by any Judgment entered in the Litigation, regardless of whether you submit a Claim Form, unless you exclude yourself from the Settlement Class. If you exclude yourself, you cannot get money from this Settlement. If you do not exclude yourself from the Settlement Class, you may object to the proposed Settlement, Plan of Allocation, or request for award of attorneys’ fees and expenses no later than January 6, 2025. The long-form Notice and the Website explain how to exclude yourself from the Settlement Class or how to object.

Lead Plaintiffs and the Settlement Class are represented by Lead Counsel: Ellen Gusikoff Stewart, Robbins Geller Rudman & Dowd LLP, 655 W. Broadway, Suite 1900, San Diego, CA 92101, 1-800-449-4900, [settlementinfo@rgrdlaw.com](mailto:settlementinfo@rgrdlaw.com) and Hagens Berman Sobol Shapiro LLP, Lucas Gilmore, 715 Hearst Avenue, Suite 300, Berkeley, CA 94710, 1-510-725-3000, [lucasg@hbsslaw.com](mailto:lucasg@hbsslaw.com). You may, but do not have to, attend the Settlement Hearing to be heard. The Court reserves the right to hold the Settlement Hearing telephonically or by other virtual means and/or change its date and/or time. Please check the Website for updates.

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

In re AURORA CANNABIS INC.  
SECURITIES LITIGATION

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No. 2:19-cv-20588-BRM-JBC

CLASS ACTION

This Document Relates To:

NOTICE OF PENDENCY AND PROPOSED  
SETTLEMENT OF CLASS ACTION

ALL ACTIONS.

**TO: ALL PERSONS AND ENTITIES WHO PURCHASED AURORA CANNABIS INC. (“AURORA” OR THE “COMPANY”) COMMON STOCK ON THE NEW YORK STOCK EXCHANGE BETWEEN OCTOBER 23, 2018 AND FEBRUARY 28, 2020, INCLUSIVE (THE “SETTLEMENT CLASS”)**

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY PROCEEDINGS IN THIS LITIGATION. PLEASE NOTE THAT IF YOU ARE A SETTLEMENT CLASS MEMBER, YOU MAY BE ENTITLED TO SHARE IN THE PROCEEDS OF THE SETTLEMENT DESCRIBED IN THIS NOTICE. TO CLAIM YOUR SHARE OF THE SETTLEMENT PROCEEDS, YOU MUST SUBMIT A VALID PROOF OF CLAIM AND RELEASE FORM (“PROOF OF CLAIM”) **POSTMARKED OR SUBMITTED ONLINE ON OR BEFORE FEBRUARY 27, 2025.**

**THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION.**

This Notice of Pendency and Proposed Settlement of Class Action (“Notice”) has been provided pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of New Jersey (the “Court”). The purpose of this Notice is to inform you of: (i) the pendency of this class action (the “Litigation”) between Doug Daulton, Francisco Quintana, Donald S. Parrish, and Quang Ma (“Lead Plaintiffs”) and Aurora, Terry Booth, and Allan Cleiren (“Defendants”); (ii) the proposed \$8.05 million settlement reached therein (the “Settlement”); and (iii) the hearing (the “Settlement Hearing”) to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement, as set forth in the Stipulation of Settlement dated June 7, 2024 (the “Stipulation”), by and between Lead Plaintiffs and Defendants (the “Settling Parties”). This Notice describes what steps you may take in relation to the Settlement and this class action.<sup>1</sup>

This Notice is not intended to be, and should not be construed as, an expression of any opinion by the Court with respect to the truth of the allegations in the Litigation as to any of the Defendants or the merits of the claims or defenses asserted by or against the Defendants. This Notice is solely to advise you of the proposed Settlement of the Litigation and of your rights in connection therewith.

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<sup>1</sup> All capitalized terms used in this Notice that are not otherwise defined herein shall have the meanings provided in the Stipulation, which is available on the website [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com).

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>SUBMIT A PROOF OF CLAIM</b>	The only way to be eligible to receive a payment from the Settlement. <b>Proofs of Claim must be postmarked or submitted online on or before February 27, 2025. The Proof of Claim is available on the website.</b>
<b>EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS</b>	Get no payment. This is the only option that <i>potentially</i> allows you to ever be part of any other lawsuit against the Defendants or any other Defendants' Released Persons about the legal claims being resolved by this Settlement. Should you elect to exclude yourself from the Settlement Class, you should understand that Defendants and the other Released Defendant Parties will have the right to assert any and all defenses they may have to any claims that you may seek to assert, including, without limitation, the defense that any such claims are untimely under applicable statutes of limitations and statutes of repose. <b>Exclusions must be postmarked on or before January 6, 2025.</b>
<b>OBJECT</b>	Write to the Court about why you do not like the Settlement, the Plan of Allocation, and/or the request for attorneys' fees and expenses. You will still be a Member of the Settlement Class. <b>Objections must be received by the Court and counsel on or before January 6, 2025. If you submit a written objection, you may (but do not have to) attend the hearing.</b>
<b>GO TO THE HEARING ON JANUARY 28, 2025 AT 2:00 P.M.</b>	Ask to speak in Court about the fairness of the Settlement. <b>Requests to speak must be received by the Court and counsel on or before January 6, 2025.</b>
<b>DO NOTHING</b>	Receive no payment. You will, however, still be a Member of the Settlement Class, which means that you give up your right to ever be part of any other lawsuit against the Defendants or any other Released Defendant Parties about the legal claims being resolved by this Settlement and you will be bound by any judgments or orders entered by the Court in the Litigation.

### **SUMMARY OF THIS NOTICE**

#### **Statement of Settlement Class Recovery**

Pursuant to the Settlement described herein, an \$8.05 million settlement fund has been established. Based on Lead Plaintiffs' estimate of the number of allegedly damaged shares eligible to recover under the Settlement, the average distribution per common share under the Plan of Allocation is approximately \$0.05, before deduction of any taxes on the income earned on the Settlement Amount, notice and administration costs, and the attorneys' fees and expenses as determined by the Court. **Settlement Class Members should note, however, that these are only estimates.** A Settlement Class Member's actual recovery will be a proportion of the Net Settlement Fund determined by that claimant's claims as compared to the total claims of all

Questions? Visit [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com) or call toll-free 877-495-6308

Settlement Class Members who submit acceptable Proofs of Claim. An individual Settlement Class Member may receive more or less than these estimated average amounts. See Plan of Allocation set forth and discussed at pages 13 through 18 below for more information on the calculation of your claim.

### **Statement of Potential Outcome of Case**

The Settling Parties disagree on both liability and damages and do not agree on the amount of damages that would be recoverable if the Settlement Class prevailed on each or any claim alleged. Defendants deny that they are liable to the Settlement Class, deny that the Settlement Class has suffered any damages, and deny any wrongdoing or liability whatsoever. The issues on which the parties disagree are many, but include: (1) whether Defendants engaged in conduct that would give rise to any liability to the Settlement Class under the federal securities laws; (2) whether Defendants have valid defenses to any such claims of liability; (3) the appropriate economic model for determining the amount by which the price of Aurora common stock traded on the New York Stock Exchange was allegedly artificially inflated (if at all) during the relevant period; (4) the amount, if any, by which the price of Aurora common stock traded on the New York Stock Exchange was allegedly artificially inflated (if at all) during the relevant period; (5) the effect of various market forces on the price of Aurora common stock at various times during the relevant period; (6) the extent to which external factors influenced the price of Aurora common stock traded on the New York Stock Exchange at various times during the relevant period; (7) the extent to which the matters that Lead Plaintiffs alleged were materially false or misleading influenced (if at all) the price of Aurora common stock traded on the New York Stock Exchange at various times during the relevant period; and (8) the extent to which the various allegedly adverse material facts that Lead Plaintiffs alleged were omitted influenced (if at all) the price of Aurora common stock traded on the New York Stock Exchange at various times during the relevant period.

### **Statement of Attorneys' Fees and Expenses Sought**

Since the Litigation's inception, Lead Plaintiffs' Counsel have expended considerable time and effort in the prosecution of this Litigation on a wholly contingent basis and have advanced the expenses of the Litigation in the expectation that if they were successful in obtaining a recovery for the Settlement Class, they would be paid from such recovery. Lead Counsel will apply to the Court on behalf of all Lead Plaintiffs' Counsel for an award of attorneys' fees not to exceed 25% of the Settlement Amount, plus expenses not to exceed \$150,000, plus interest earned on both amounts at the same rate as earned by the Settlement Fund. In addition, one or more of the Lead Plaintiffs may seek reimbursement of their time and expenses in connection with their representation of the Settlement Class. If the amounts requested are approved by the Court, the average cost per Aurora common share will be approximately \$0.01.

### **Further Information**

For further information regarding the Litigation, this Notice, or to review the Stipulation of Settlement, please contact the Claims Administrator toll-free at 877-495-6308, or visit the website [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com).

You may also contact a representative of counsel for the Settlement Class: Greg Wood, Shareholder Relations, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, 800-449-4900, [settlementinfo@rgrdlaw.com](mailto:settlementinfo@rgrdlaw.com); or Lucas Gilmore, Hagens Berman Sobol Shapiro LLP, 715 Hearst Avenue, Suite 300, Berkeley, CA 94710, 510-725-3000, [lucasg@hbsslaw.com](mailto:lucasg@hbsslaw.com).

**Please Do Not Call the Court or Defendants with Questions About the Settlement.**

**Reasons for the Settlement**

Lead Plaintiffs' principal reason for entering into the Settlement is the benefit to the Settlement Class now, without further risk or the delays inherent in continued litigation. The cash benefit under the Settlement must be considered against the significant risk that a smaller recovery – or, indeed, no recovery at all – might be achieved after contested motions, trial, and likely appeals, a process that could last several years into the future. For the Defendants, who have denied and continue to deny all allegations of liability, fault, or wrongdoing whatsoever, the principal reason for entering into the Settlement is to eliminate the uncertainty, risk, costs, and burdens inherent in any litigation, especially in complex cases such as this Litigation. Defendants have concluded that further conduct of this Litigation could be protracted and distracting.

**BASIC INFORMATION**

**1. What is the purpose of this Notice?**

This Notice was prepared and is being made available to you pursuant to an Order of a U.S. District Court because you or someone in your family or an investment account for which you serve as custodian may have purchased Aurora common stock on the New York Stock Exchange during the period between October 23, 2018 and February 28, 2020, inclusive (the “Class Period”).<sup>2</sup>

This Notice explains the class action lawsuit, the Settlement, Settlement Class Members' legal rights in connection with the Settlement, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the Litigation is the United States District Court for the District of New Jersey, and the case is known as *In re Aurora Cannabis Inc. Securities Litigation*, No. 2:19-cv-20588-BRM-JBC. The case has been assigned to the Honorable James B. Clark, III. The individuals representing the Settlement Class are the “Lead Plaintiffs,” and the individuals and entity they sued and who have now settled are called the Defendants.

**2. What is this lawsuit about?**

The Litigation is currently pending before the Honorable James B. Clark, III in the United States District Court for the District of New Jersey. The initial complaint in the Litigation was filed on November 21, 2019 before Judge John M. Vazquez. On July 23, 2020, the Court appointed Lead Plaintiffs and Robbins Geller Rudman & Dowd LLP and Hagens Berman Sobol Shapiro LLP as Lead Counsel.<sup>3</sup>

On September 21, 2020, Lead Plaintiffs filed their Amended Complaint and Demand for July Trial alleging violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”). The Amended Complaint alleged that Defendants failed to disclose that they

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<sup>2</sup> This Litigation is separate and distinct from the case entitled *Landry v. Aurora Cannabis Inc., et al.*, filed in the Court of King's Bench of Alberta, Canada, on behalf of purchasers of Aurora securities on the Toronto Stock Exchange on or after September 11, 2019, and who held some or all of those shares until after the close of trading on November 14, 2019, November 18, 2019, November 29, 2019, or December 21, 2019.

<sup>3</sup> The Court also appointed Matt Golis as Lead Plaintiff, but he is no longer serving in that capacity.

had materially misrepresented the Company's business and prospects. Defendants and former defendants Stephen Dobler, Glen Ibbott, Cameron Battley, Michael Singer, and Jason Dyck (the "Former Defendants") moved to dismiss the Amended Complaint, which was granted without prejudice on July 6, 2021. On September 7, 2021, Lead Plaintiffs filed their Second Amended Complaint and Demand for Jury Trial (the "SAC"), which added allegations about the Company's transaction with Radient Technologies Inc. On December 6, 2021, Defendants and the Former Defendants moved to dismiss the SAC, and on September 23, 2022, the Court granted the motion to dismiss without prejudice.

On November 7, 2022, Lead Plaintiffs filed the operative Third Amended Complaint and Demand for Jury Trial (the "Complaint"). On January 6, 2023, Defendants moved to dismiss the Complaint. On August 24, 2023, the Court issued an opinion and entered an order granting in part and denying in part the motion to dismiss. On September 8, 2023, Lead Plaintiffs filed a Motion for Partial Reconsideration and/or Clarification of the Court's August 24, 2023 Opinion. Defendants opposed Lead Plaintiffs' motion on September 26, 2023. Defendants answered the Complaint on September 22, 2023.

On September 14, 2023, the Litigation was reassigned to Judge Martinotti. Magistrate Judge Clark held a Rule 16 scheduling conference on October 26, 2023, and on that date, Judge Clark entered the Parties' Pretrial Scheduling Order. The Court held a conference with the Parties on November 16, 2023, and following that conference Lead Counsel informed the Court of their decision to withdraw the motion for reconsideration and move to amend the Complaint. On January 22, 2024, Lead Plaintiffs filed their motion to amend the Complaint. Defendants opposed the motion to amend the Complaint. The motion was pending at the time this agreement was reached.

During the course of discovery, the parties exchanged written discovery requests, Lead Plaintiffs served third party discovery, the parties negotiated a protective order which was "So Ordered" by the Court, and they submitted a proposed electronic discovery agreement, which was "So Ordered" by the Court.

On March 4, 2024, Lead Plaintiffs and Defendants participated in a voluntary confidential mediation session with Robert A. Meyer, Esq. of JAMS. The mediation session was preceded by submission of mediation statements by the Settling Parties. The Settling Parties engaged in good-faith negotiations, and after a full day of mediation, accepted a mediator's proposal to settle the Litigation in exchange for a cash payment of \$8.05 million for the benefit of the Settlement Class, subject to the negotiation of the terms of a Stipulation of Settlement and approval by the Court. The Stipulation (together with the Exhibits thereto) reflects the final and binding agreement among the Settling Parties.

### **3. Why is there a settlement?**

The Court has not decided in favor of Defendants or of the Lead Plaintiffs. Instead, both sides agreed to the Settlement to avoid the distraction, costs, and risks of further litigation, and Lead Plaintiffs agreed to the Settlement in order to ensure that Settlement Class Members will receive compensation.

### **WHO IS IN THE SETTLEMENT**

### **4. How do I know if I am a Member of the Settlement Class?**

The Court directed that everyone who fits this description is a Settlement Class Member: all Persons who purchased Aurora common stock on the New York Stock Exchange between October 23, 2018 and February 28, 2020, inclusive. Excluded from the Settlement Class are:

Questions? Visit [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com) or call toll-free 877-495-6308

(i) Defendants and the Former Defendants and members of their immediate families; (ii) the current and former officers and directors of Aurora and members of their immediate families; (iii) any entity in which any Defendant or Former Defendant has a controlling interest or which is related to or affiliated with any Defendant or Former Defendant; (iv) Aurora's subsidiaries and affiliates or other entities owned or controlled by it; (v) the legal representatives, agents, heirs, successors, administrators, executors, and assigns of each Defendant and Former Defendant; and (vi) any Persons who properly exclude themselves by submitting a valid and timely request for exclusion. To the extent any Aurora employee benefit plan receives a distribution from the Net Settlement Fund, no portion shall be allocated to any person or entity who is excluded from the Settlement Class by definition.

**Please Note:** Receipt of this Notice does not mean that you are a Settlement Class Member or that you will be entitled to receive a payment from the Settlement. If you are a Settlement Class Member and you wish to be eligible to participate in the distribution of the proceeds from the Settlement, you are required to submit a Proof of Claim which is available on the website and the required supporting documentation as set forth therein postmarked or submitted online on or before February 27, 2025.

#### **5. What if I am still not sure if I am included?**

If you are still not sure whether you are included, you can ask for free help. You can contact the Claims Administrator toll-free at 877-495-6308, or you can fill out and return the Proof of Claim to see if you qualify.

### **THE SETTLEMENT BENEFITS – WHAT YOU GET**

#### **6. What does the Settlement provide?**

The Settlement provides that, in exchange for the release of the Released Claims (defined below) and dismissal of the Litigation, Defendants have agreed to pay or cause to be paid \$8.05 million in cash to be distributed after taxes, tax expenses, notice and claims administration expenses, and approved fees and expenses, *pro rata*, to Settlement Class Members who send in a valid Proof of Claim pursuant to the Court-approved Plan of Allocation. The Plan of Allocation is described in more detail at the end of this Notice.

#### **7. How much will my payment be?**

Your share of the Net Settlement Fund will depend on several things, including the total dollar amount of claims represented by the valid Proofs of Claim that Settlement Class Members send in, compared to the dollar amount of your claim, all as calculated under the Plan of Allocation discussed below.

### **HOW YOU GET A PAYMENT – SUBMITTING A PROOF OF CLAIM**

#### **8. How can I get a payment?**

To be eligible to receive a payment from the Settlement, you must submit a Proof of Claim. A Proof of Claim may be downloaded at [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com). Read the instructions carefully, fill out the Proof of Claim, include all the documents the form asks for, sign it, and **mail** (to *Aurora Cannabis Securities Litigation*, c/o JND Legal Administration, Claims Administrator, P.O. Box 91320, Seattle, WA 98111) **or submit it online at**



[www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com) so that it is postmarked or received no later than February 27, 2025.

**9. When would I get my payment?**

The Court will hold a Settlement Hearing on January 28, 2025, at 2:00 p.m., to decide whether to approve the Settlement. If the Court approves the Settlement, there might be appeals. It is always uncertain whether appeals can be resolved, and if so, how long it would take to resolve them. It also takes time for all the Proofs of Claim to be processed. Please be patient.

**10. What am I giving up to get a payment or to stay in the Settlement Class?**

Unless you timely and validly exclude yourself in connection with this Settlement, you are in the Settlement Class, and that means you cannot sue, continue to sue, or be part of any other lawsuit against Defendants or the Released Defendant Parties about the Released Claims (as defined below) in this case. It also means that all of the Court's orders will apply to you and legally bind you. If you remain a Settlement Class Member, and if the Settlement is approved, you will give up all "Released Claims" (as defined below), including "Unknown Claims" (as defined below), against the "Defendants' Released Persons" (as defined below):

- "Released Claims" means any and all claims, rights, and causes of action of every nature and description, including, duties, obligations, demands, losses, actions, debts, sums of money, suits, contracts, agreements, judgments, matters, issues, promises, damages, and liabilities, whether known or unknown, contingent or non-contingent, suspected or unsuspected, discoverable or undiscoverable, concealed or hidden, liquidated or unliquidated, accrued or unaccrued, at law or in equity, whether class or individual in nature, whether arising under federal or state statutory or common law or any other law, rule or regulation, whether foreign or domestic, that have been asserted, could have been asserted, or could be asserted in the future, in any forum, whether foreign or domestic, against any or all of Defendants' Released Persons that arise out of or are based upon or relate in any way to: (i) the Litigation, including any claims, causes of action, allegations, acts, transactions, facts, events, matters, occurrences, regulatory filings, statements, representations, disclosures, or omissions that were or could have been set forth, alleged, or referenced in the Litigation; and (ii) the purchase of Aurora common stock on the New York Stock Exchange at any time during the Class Period. "Released Claims" does not include claims to enforce the Settlement or any derivative or ERISA claims. Nor does it include the claims of any Person who submits a request for exclusion in connection with this Settlement that is accepted by the Court. "Released Claims" includes "Unknown Claims" as defined below. "Released Claims" does not include claims which are alleged in *Landry v. Aurora Cannabis Inc., et al.*, pending in the Court of King's Bench of Alberta, Canada ("Canadian Action") to the extent that such claims are based upon the purchase of Aurora stock on an exchange or market other than the New York Stock Exchange. For the avoidance of doubt, to the extent a class member or putative class member in the Canadian Action purchased Aurora stock on the New York Stock Exchange and another exchange or market, such claims are released to the extent they are based upon the purchase of Aurora stock on the New York Stock Exchange.
- "Released Defendants' Claims" means any and all claims and causes of action of every nature and description whatsoever, including both known claims and Unknown Claims, against Plaintiffs, Lead Plaintiffs' Counsel, or any Settlement Class Member that arise

out of or relate in any way to the institution, prosecution, or settlement of the claims against Defendants or the Former Defendants in the Litigation, except for claims relating to the enforcement of the Settlement.

- “Released Defendant Party” or “Released Defendant Parties” or “Defendants’ Released Persons” mean any or all of Defendants and the Former Defendants and/or any or all of their related parties, including, without limitation, any and all of their current or former parents, subsidiaries, affiliates, predecessors, successors, divisions, funds, joint ventures, and general or limited partnerships, and each of their respective current or former officers, directors, trustees, partners, members, contractors, auditors, principals, agents, managing agents, employees, attorneys, accountants, investment bankers, commercial bankers, financial or investment advisors, consultants, advisors, underwriters, insurers in their capacities as such, as well as each of the Defendants’ and Former Defendants’ immediate family members, heirs, executors, personal or legal representatives, estates, beneficiaries, predecessors, successors, legatees, devisees, administrators, spouses, receivers and trustees, settlors, auditors, accountants, and assigns, as well as any trust of which any of the Defendants or Former Defendants is the settlor or which is for the benefit of any of the Defendants or Former Defendants and/or member(s) of his family, and any person, firm, trust, corporation, officer, director, or other individual or entity in which any of the Defendants or Former Defendants has a controlling interest or which is related to or affiliated with any of the Defendants or Former Defendants.
- “Unknown Claims” means (a) any and all Released Claims which any of the Releasing Plaintiff Parties do not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Parties, which, if known by him, her, or it, might have affected his, her, or its settlement with and release of the Released Defendant Parties, or might have affected his, her, or its decision(s) with respect to the Settlement, including, but not limited to, whether or not to object to this Settlement or seek exclusion from the Settlement Class; and (b) any and all Released Defendants’ Claims that any of the Released Defendant Parties do not know or suspect to exist in his, her, or its favor at the time of the release of Plaintiffs, the Settlement Class, and Lead Plaintiffs’ Counsel, which, if known by him, her, it, or them might have affected his, her, its, or their settlement and release of Plaintiffs, the Settlement Class, and Lead Plaintiffs’ Counsel. With respect to (a) any and all Released Claims against the Released Defendant Parties, and (b) any and all Released Defendants’ Claims against Plaintiffs, the Settlement Class, and Lead Plaintiffs’ Counsel, the Settling Parties stipulate and agree that, upon the Effective Date, the Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have expressly waived, the provisions, rights, and benefits of California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

The Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have, expressly waived any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to California Civil Code §1542. The Releasing

Plaintiff Parties and Released Defendant Parties acknowledge that they may hereafter discover facts, legal theories, or authorities in addition to or different from those which he, she, it, or their counsel now knows or believes to be true with respect to the subject matter of the Released Claims or Released Defendants' Claims, but (a) the Releasing Plaintiff Parties shall expressly fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Releasing Plaintiff Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Claims against the Released Defendant Parties, known or unknown, suspected or unsuspected, contingent or non-contingent, accrued or unaccrued, whether or not concealed or hidden, which now exist, or heretofore have existed, or may hereafter exist, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities, and (b) the Released Defendant Parties shall expressly fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Released Defendant Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Defendants' Claims against Lead Plaintiffs, the Settlement Class, and Lead Plaintiffs' Counsel, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. The Settling Parties acknowledge, and the Releasing Plaintiff Parties and Released Defendant Parties shall be deemed by operation of the Judgment to have acknowledged, that the foregoing waiver was separately bargained for and is an essential element of the Settlement of which this release is a part.

### **EXCLUDING YOURSELF FROM THE SETTLEMENT CLASS**

If you do not want to participate in this Settlement, and you want to keep the right to potentially sue the Defendants and the other Defendants' Released Persons, on your own, about the claims being released by the Settlement, then you must take steps to remove yourself from the Settlement. This is called excluding yourself – or is sometimes referred to as “opting out.” If you are requesting exclusion because you want to bring your own lawsuit based on the matters alleged in this Litigation, you may want to consult an attorney and discuss whether any individual claim that you may wish to pursue would be time-barred by the applicable statutes of limitation or repose. Also, the Settling Parties have agreed that Defendants may terminate the Settlement and render it null and void in the event that Persons who would otherwise be Members of the Settlement Class who collectively purchased a certain number of shares of Aurora common stock on the New York Stock Exchange exclude themselves from the Settlement Class.

#### **11. How do I get out of the Settlement Class and the proposed Settlement?**

To exclude yourself from the Settlement Class and the Settlement, you must send a letter by First-Class Mail stating that you “request exclusion from the Settlement Class in the “*Aurora*

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*Cannabis Securities Litigation.*” Your letter must include your purchases and sales of Aurora common stock on the New York Stock Exchange during the Class Period, including the dates and number of shares of Aurora common stock you purchased and sold and the price paid for each such purchase and received for each such sale. In addition, you must include your name, address, telephone number, and your signature. You must submit your exclusion request so that it is **postmarked no later than January 6, 2025** to:

*Aurora Cannabis Securities Litigation*  
Claims Administrator  
c/o JND Legal Administration  
EXCLUSIONS  
P.O. Box 91320  
Seattle, WA 98111

If you ask to be excluded, you will not get any payment from the Settlement, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit, and you may be able to sue the Defendants and the other Defendants’ Released Persons about the Released Claims in the future, if such claims are not time-barred.

**12. If I do not exclude myself, can I sue the Defendants and the other Defendants’ Released Persons for the same thing later?**

No. Unless you exclude yourself, you give up any rights you may potentially have to sue the Defendants and the other Defendants’ Released Persons for any and all Released Claims. If you have a pending lawsuit against the Defendants’ Released Persons, speak to your lawyer in that case immediately. You must exclude yourself from the Settlement Class in this Litigation to continue your own lawsuit. Remember, the exclusion deadline is January 6, 2025.

**13. If I exclude myself, can I get money from the proposed Settlement?**

No. If you exclude yourself, you should not send in a Proof of Claim to ask for any money. But you may have the right to potentially sue or be part of a different lawsuit against the Defendants and the other Defendants’ Released Persons.

**THE LAWYERS REPRESENTING YOU**

**14. Do I have a lawyer in this case?**

The Court ordered that the law firms of Robbins Geller Rudman & Dowd LLP and Hagens Berman Sobol Shapiro LLP represent the Settlement Class Members, including you. These lawyers are called Lead Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

**15. How will the lawyers be paid?**

Lead Counsel will apply to the Court for an award of attorneys’ fees not to exceed 25% of the Settlement Amount and for expenses, costs, and charges in an amount not to exceed \$150,000 in connection with the Litigation, plus interest on such fees and expenses at the same rate as earned by the Settlement Fund. In addition, Lead Plaintiffs may seek up to \$40,000 in the aggregate for their time and expenses incurred in representing the Settlement Class. Such sums as may be approved by the Court will be paid from the Settlement Fund.

**OBJECTING TO THE SETTLEMENT**

You can tell the Court that you do not agree with the Settlement or any part of it.

**16. How do I tell the Court that I object to the proposed Settlement?**

If you are a Settlement Class Member, you can comment on or object to the proposed Settlement, the proposed Plan of Allocation, and/or Lead Plaintiffs’ Counsel’s fee and expense application and awards to Lead Plaintiffs. You can write to the Court setting out your comment or objection. The Court will consider your views. To comment or object, you must send a signed letter saying that you wish to comment on or object to the proposed Settlement in the *Aurora Cannabis Securities Litigation*. Include your name, address, telephone number, and your signature (even if you are represented by counsel), identify the date(s), price(s), and number of shares of Aurora common stock on the New York Stock Exchange purchased or sold during the Class Period, and state with specificity your comments or the reasons why you object to the proposed Settlement, Plan of Allocation, and/or fee and expense application, including any legal and evidentiary support for such objection. Any objection must state whether it applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class. In addition, the objector must identify all class action settlements to which the objector or his, her, or its counsel have previously objected. You must also include copies of documents demonstrating your purchases and/or sales of Aurora common stock on the New York Stock Exchange during the Class Period. Your comments or objection must be filed with the Court and mailed or delivered to each of the following addresses such that it is *received no later than January 6, 2025*:

COURT	LEAD COUNSEL	DEFENDANTS’ COUNSEL
CLERK OF THE COURT UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY Martin Luther King Building & U.S. Courthouse 50 Walnut Street Room 4015 Newark, NJ 07102	ROBBINS GELLER RUDMAN & DOWD LLP Attn: Ellen Gusikoff Stewart 655 West Broadway, Suite 1900 San Diego, CA 92101  HAGENS BERMAN SOBOL SHAPIRO LLP Attn: Lucas Gilmore 715 Hearst Avenue, Suite 300 Berkeley, CA 94710	JENNER & BLOCK LLP Attn: Howard S. Suskin 353 N. Clark Street Chicago, IL 60654-3456  Andrew J. Lichtman 1155 Avenue of the Americas New York, NY 10036-2711

**17. What is the difference between objecting and excluding?**

Objecting is simply telling the Court that you do not like something about the Settlement. You can object **only** if you stay in the Settlement Class.

Excluding yourself is telling the Court that you do not want to be paid and do not want to release any claims you think you may have against Defendants and the other Released Defendant Parties. If you exclude yourself from the Settlement Class, you cannot object to the Settlement because it does not affect you.

**THE COURT’S SETTLEMENT HEARING**

The Court will hold a hearing to decide whether to approve the proposed Settlement. You may attend and you may ask to speak, but you do not have to.

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**18. When and where will the Court decide whether to approve the proposed Settlement?**

The Court will hold a Settlement Hearing at **2:00 p.m., on January 28, 2025**, in the Courtroom of the Honorable James B. Clark, III, at the United States District Court for the District of New Jersey, Frank R. Lautenberg Post Office & U.S. Courthouse, 2 Federal Square, Newark, NJ 07102. At the hearing, the Court will consider whether the Settlement and the Plan of Allocation are fair, reasonable, and adequate. If there are objections, the Court will consider them, even if you do not ask to speak at the hearing. The Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Lead Counsel and Lead Plaintiffs. At or after the Settlement Hearing, the Court will decide whether to approve the Settlement and the Plan of Allocation. We do not know how long these decisions will take. You should be aware that the Court may change the date, time, and location of the Settlement Hearing without another notice being sent to Settlement Class Members.

There exists the possibility that the Court may decide to conduct the Settlement Hearing by video or telephonic conference, or otherwise allow Settlement Class Members to appear at the hearing by phone or video conference, without further written notice to the Settlement Class. **In order to determine whether the date and time of the Settlement Hearing have changed, or whether Settlement Class Members (who wish to attend the hearing) must or may participate by phone or video, it is important that you monitor the Court's docket or the Settlement website, [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com), before making any plans to attend the Settlement Hearing. Any updates regarding the Settlement Hearing, including any changes to the date and time of the hearing or updates regarding in-person or remote appearances at the hearing, will be posted to the Settlement website. Also, if the Court requires or allows Settlement Class Members to participate in the Settlement Hearing by telephone or video conference, the information for accessing the hearing will be posted to the Settlement website.** If you want to attend the hearing, either in person or remotely, if permitted, you should check with Lead Counsel or the Settlement website beforehand to be sure that the date and/or time has not changed.

**19. Do I have to come to the hearing?**

No. Lead Counsel will answer any questions the Court may have. But, you are welcome to come at your own expense. If you are a Settlement Class Member and send an objection, you do not have to come to Court to talk about it. As long as you are a Settlement Class Member and mailed your complete written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary. Settlement Class Members do not need to appear at the hearing or take any other action to indicate their approval.

**20. May I speak at the hearing?**

If you object to the Settlement, the Plan of Allocation, and/or the fee and expense application, you may ask the Court for permission to speak at the Settlement Hearing. To do so, you must include with your objection (*see* question 16 above) a statement saying that it is your "Notice of Intention to Appear in the *Aurora Cannabis Securities Litigation*." Persons who intend to object to the Settlement, the Plan of Allocation, and/or any attorneys' fees and expenses to be awarded to Lead Plaintiffs' Counsel or Lead Plaintiffs and desire to present evidence at the Settlement Hearing must include in their written objections the identity of any witnesses they may call to testify and any exhibits they intend to introduce into evidence at the Settlement Hearing. Your notice of intention to appear must be **received no later than January 6, 2025**, and addressed

to the Clerk of Court, Lead Counsel, and Defendants' Counsel, at the addresses listed above in question 16.

You cannot speak at the hearing if you exclude yourself from the Settlement Class.

### **IF YOU DO NOTHING**

#### **21. What happens if I do nothing?**

If you do nothing, you will not receive any money from this Settlement. In addition, unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants and the other Released Defendant Parties about the Released Claims in this case.

### **GETTING MORE INFORMATION**

#### **22. How do I get more information?**

For even more detailed information concerning the matters involved in this Litigation, you can obtain answers to common questions regarding the proposed Settlement by contacting the Claims Administrator toll-free at 877-495-6308. Reference is also made to the Stipulation, to the pleadings in support of the Settlement, to the Orders entered by the Court and to the other settlement related papers filed in the Litigation, which are posted on the Settlement website at [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com), and which may be inspected at the Office of the Clerk of the United States District Court for the District of New Jersey, during regular business hours. For a fee, all papers filed in this Litigation are available at [www.pacer.gov](http://www.pacer.gov).

### **THE PROPOSED PLAN OF ALLOCATION OF NET SETTLEMENT FUND AMONG SETTLEMENT CLASS MEMBERS**

#### **23. How will my claim be calculated?**

As discussed above, the Settlement provides \$8.05 million in cash for the benefit of the Settlement Class. The Settlement Amount and any interest it earns constitute the "Settlement Fund." The Settlement Fund, after deduction of Court-approved attorneys' fees and expenses, Notice and Administration Expenses, Taxes, and any other fees or expenses approved by the Court, is the "Net Settlement Fund." If the Settlement is approved by the Court, the Net Settlement Fund will be distributed to eligible Authorized Claimants – *i.e.*, Members of the Settlement Class who timely submit valid Proofs of Claim that are accepted for payment by the Court – in accordance with this proposed Plan of Allocation ("Plan of Allocation" or "Plan") or such other plan of allocation as the Court may approve. Settlement Class Members who do not timely submit valid Proofs of Claim will not share in the Net Settlement Fund but will otherwise be bound by the Settlement. The Court may approve this proposed Plan of Allocation, or modify it, without additional notice to the Settlement Class. Any order modifying the Plan of Allocation will be posted on the Settlement website, [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com).

The objective of the Plan of Allocation is to distribute the Settlement proceeds equitably among those Settlement Class Members who allegedly suffered economic losses as a proximate result of the alleged wrongdoing. The Plan of Allocation is not a formal damages analysis, and the calculations made in accordance with the Plan of Allocation are not necessarily intended to be estimates of, or indicative of, the amounts that Settlement Class Members might have been able to recover after a trial. Nor are the calculations in accordance with the Plan of Allocation intended to be estimates of the amounts that will be paid to Authorized Claimants under the Settlement.

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The computations under the Plan of Allocation are only a method to weigh, in a fair and equitable manner, the claims of Authorized Claimants against one another for the purpose of making *pro rata* allocations of the Net Settlement Fund.

The Plan of Allocation was developed in consultation with Lead Plaintiffs' damages consultant. In developing the Plan of Allocation, Lead Plaintiffs' damages consultant calculated the estimated amount of alleged artificial inflation in the per share prices of Aurora common stock traded on the New York Stock Exchange that was allegedly caused by Defendants' alleged materially false and misleading statements and omissions.

As previously described in the Notice, the Net Settlement Fund is the remainder of the Settlement Fund after deduction of Court-awarded attorneys' fees and expenses, settlement administration costs, and any applicable taxes.

In calculating the estimated artificial inflation allegedly caused by the misrepresentations and omissions, Lead Plaintiffs' damages consultant considered statistically significant price changes in Aurora common stock in reaction to the public disclosures that allegedly corrected the respective alleged misrepresentations and omissions, adjusting the price changes for factors that were attributable to market or industry forces, and for non-fraud related, Aurora-specific information.

In order to have recoverable damages in connection with purchases of Aurora common stock on the New York Stock Exchange during the Class Period, disclosure of the alleged misrepresentations or omissions must be the cause of the decline in the price of the Aurora common stock. In this case, Lead Plaintiffs allege that Defendants made false statements and omitted material facts during the period between October 23, 2018 through and including the close of trading on February 28, 2020, which had the effect of artificially inflating the prices of Aurora common stock traded on the New York Exchange. Lead Plaintiffs assert that, as the result of the alleged corrective disclosures, artificial inflation was removed from the price of Aurora stock.

In order to have a "Recognized Claim Amount" under the Plan of Allocation, shares of Aurora common stock traded on the New York Stock Exchange must have been purchased during the Class Period and held through a corrective disclosure.

### **CALCULATION OF RECOGNIZED CLAIM AMOUNT**

Based on the formulas stated below, a "Recognized Claim Amount" will be calculated for each purchase of Aurora common stock on the New York Stock Exchange during the Class Period that is listed on the Proof of Claim and for which adequate documentation is provided. If a Recognized Claim Amount calculates to a negative number or zero under the formulas below, that Recognized Claim Amount will be zero.

For each share of Aurora common stock purchased on the New York Stock Exchange during the period between October 23, 2018 through February 28, 2020, inclusive,<sup>4</sup> and:

- (a) Sold prior to September 12, 2019, the Recognized Claim Amount per share is zero;
- (b) Sold on or between September 12, 2019 through and including the close of trading on February 27, 2020, the Recognized Claim Amount will be *the lesser of*: (i) the inflation per share at the time of purchase less the inflation per share at the time of sale (as presented in Table A below); and (ii) the difference between the purchase price and the sale price;

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<sup>4</sup> For Aurora common shares purchased on February 28, 2020, the Recognized Claim Amount shall be zero.



- (c) If you retained at the end of February 27, 2020, and sold on or before May 27, 2020, the Recognized Claim Amount per share shall be **the least of**: (i) the inflation per share at the time of purchase (as shown in Table A below); (ii) the difference between the purchase price and the selling price; and (iii) the difference between the purchase price and the average closing price up to the date of sale as set forth in Table B below; and
- (d) Held as of the close of trading on May 27, 2020, or sold thereafter, the Recognized Claim Amount shall be **the lesser of**: (i) the inflation per share at the time of purchase (as shown in Table A below); or (ii) the purchase price minus \$10.41, the average closing price for Aurora common stock on the New York Stock Exchange between February 28, 2020 through May 27, 2020 (the last entry in Table B below).<sup>5</sup>

**TABLE A**

<b>Inflation Period</b>	<b>Inflation per share</b>
October 23, 2018 – September 11, 2019	\$6.01
September 12, 2019 – October 9, 2019	\$5.65
October 10, 2019 – October 17, 2019	\$2.14
October 18, 2019 – February 6, 2020	\$0.25
February 7, 2020 – February 27, 2020	\$0.07
February 28, 2020	\$0.00

**TABLE B**

<b>Date</b>	<b>Price</b>	<b>Average Closing Price</b>
2/28/2020	\$16.08	\$16.08
3/2/2020	\$16.32	\$16.20
3/3/2020	\$15.96	\$16.12
3/4/2020	\$16.56	\$16.23
3/5/2020	\$15.72	\$16.13
3/6/2020	\$14.04	\$15.78
3/9/2020	\$11.39	\$15.15
3/10/2020	\$11.76	\$14.73
3/11/2020	\$10.31	\$14.24
3/12/2020	\$8.40	\$13.65

<sup>5</sup> Under Section 21(e)(1) of the Exchange Act, “in any private action arising under this Act in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and the mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated to the market.” Consistent with the requirements of the statute, Recognized Claim Amounts are reduced to an appropriate extent by taking into account the closing prices of Aurora common stock traded on the New York Stock Exchange during the 90-day look-back period. The mean (average) closing price for Aurora common stock traded on the New York Stock Exchange during this 90-day look-back period was \$10.41 as shown in Table B.

<b>Date</b>	<b>Price</b>	<b>Average Closing Price</b>
3/13/2020	\$9.24	\$13.25
3/16/2020	\$8.30	\$12.84
3/17/2020	\$8.52	\$12.51
3/18/2020	\$7.50	\$12.15
3/19/2020	\$7.94	\$11.87
3/20/2020	\$8.76	\$11.68
3/23/2020	\$8.20	\$11.47
3/24/2020	\$8.60	\$11.31
3/25/2020	\$8.95	\$11.19
3/26/2020	\$10.86	\$11.17
3/27/2020	\$12.36	\$11.23
3/30/2020	\$10.66	\$11.20
3/31/2020	\$10.87	\$11.19
4/1/2020	\$9.71	\$11.13
4/2/2020	\$10.00	\$11.08
4/3/2020	\$9.72	\$11.03
4/6/2020	\$9.60	\$10.98
4/7/2020	\$9.60	\$10.93
4/8/2020	\$10.22	\$10.90
4/9/2020	\$10.51	\$10.89
4/13/2020	\$9.12	\$10.83
4/14/2020	\$9.00	\$10.77
4/15/2020	\$8.51	\$10.71
4/16/2020	\$8.03	\$10.63
4/17/2020	\$8.28	\$10.56
4/20/2020	\$8.58	\$10.51
4/21/2020	\$8.64	\$10.45
4/22/2020	\$8.62	\$10.41
4/23/2020	\$8.59	\$10.36
4/24/2020	\$8.76	\$10.32
4/27/2020	\$9.12	\$10.29
4/28/2020	\$9.10	\$10.26
4/29/2020	\$9.05	\$10.23
4/30/2020	\$8.88	\$10.20
5/1/2020	\$8.44	\$10.16
5/4/2020	\$8.52	\$10.13
5/5/2020	\$8.39	\$10.09
5/6/2020	\$8.30	\$10.05
5/7/2020	\$8.33	\$10.02
5/8/2020	\$8.06	\$9.98
5/11/2020	\$7.41	\$9.93
5/12/2020	\$6.46	\$9.86
5/13/2020	\$5.80	\$9.79
5/14/2020	\$6.64	\$9.73
5/15/2020	\$11.20	\$9.75

Date	Price	Average Closing Price
5/18/2020	\$17.10	\$9.89
5/19/2020	\$14.65	\$9.97
5/20/2020	\$12.75	\$10.02
5/21/2020	\$17.40	\$10.14
5/22/2020	\$16.01	\$10.24
5/26/2020	\$15.61	\$10.33
5/27/2020	\$15.30	\$10.41

If a Settlement Class Member held Aurora common stock traded on the New York Stock Exchange at the beginning of the Class Period or made multiple purchases or sales of Aurora common stock traded on the New York Stock Exchange during or after the Class Period, the starting point for calculating a claimant’s Recognized Claim Amount is to match the claimant’s holdings and purchases to their sales using the FIFO (*i.e.*, first-in-first-out) method. Under the FIFO method, Aurora common stock sold on the New York Stock Exchange during the Class Period will be matched, in chronological order first against Aurora common stock traded on the New York Stock Exchange held at the beginning of the Class Period. The remaining sales of Aurora common stock during the Class Period will then be matched, in chronological order against Aurora common stock purchased on the New York Stock Exchange during the Class Period.

Purchases and sales of Aurora common stock on the New York Stock Exchange shall be deemed to have occurred on the “contract” or “trade” date as opposed to the “settlement” or “payment” date. The receipt or grant by gift, inheritance, or operation of law of Aurora common stock traded on the New York Stock Exchange during the Class Period shall not be deemed a purchase or sale of Aurora common stock on the New York Stock Exchange for the calculation of a Recognized Claim Amount, unless (i) the donor or decedent purchased such shares of Aurora common stock during the Class Period; (ii) no Proof of Claim was submitted by or on behalf of the donor, on behalf of the decedent, or by anyone else with respect to such shares of Aurora common stock; and (iii) it is specifically so provided in the instrument of gift or assignment.

An Authorized Claimant’s Recognized Claim Amount shall be the amount used to calculate the Authorized Claimant’s *pro rata* share of the Net Settlement Fund. If the sum total of Recognized Claim Amounts of all Authorized Claimants who are entitled to receive payment out of the Net Settlement Fund is greater than the Net Settlement Fund, each Authorized Claimant shall receive his, her, or its *pro rata* share of the Net Settlement Fund. The *pro rata* share shall be the Authorized Claimant’s Recognized Claim Amount divided by the total of the Recognized Claim Amounts of all Authorized Claimants, multiplied by the total amount in the Net Settlement Fund. Given the costs of distribution, the Net Settlement Fund will be allocated among all Authorized Claimants whose Recognized Claim Amount is \$10.00 or greater.

If a claimant had a market gain with respect to their overall transactions in Aurora common stock on the New York Stock Exchange during the Class Period, the value of the claimant’s Recognized Claim Amount will be zero. If a claimant suffered an overall market loss with respect to their overall transactions in Aurora common stock on the New York Stock Exchange during the Class Period but that market loss was less than the claimant’s total Recognized Claim Amount calculated above, then the claimant’s Recognized Claim Amount will be limited to the amount of the actual market loss.

Distributions will be made to Authorized Claimants after all claims have been processed, after the Court has finally approved the Settlement, and after any appeals are resolved. If there is any balance remaining in the Net Settlement Fund after at least six (6) months from the initial date

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of distribution of the Net Settlement Fund (whether by reason of tax refunds, uncashed checks, or otherwise), the Claims Administrator shall, if feasible, reallocate such balance among Authorized Claimants in an equitable and economic fashion. These redistributions shall be repeated until the balance remaining in the Net Settlement Fund is no longer economically feasible to distribute to Settlement Class Members. Thereafter, any balance that still remains in the Net Settlement Fund shall be donated to an appropriate non-sectarian, non-profit charitable organization(s) serving the public interest.

Please contact the Claims Administrator or Lead Counsel if you disagree with any determinations made by the Claims Administrator regarding your Proof of Claim. If you are dissatisfied with the determinations, you may ask the Court, which retains jurisdiction over all Settlement Class Members and the claims administration process, to decide the issue by submitting a written request for review.

The Court has reserved jurisdiction to allow, disallow, or adjust the claim of any Settlement Class Member on equitable grounds.

Payment pursuant to the Plan of Allocation set forth above shall be conclusive against all Authorized Claimants. Defendants, their respective counsel, and all other Defendants' Released Persons will have no responsibility or liability whatsoever for the investment of the Settlement Fund, the distribution of the Net Settlement Fund, the Plan of Allocation, or the payment of any claim. No Person shall have any claim against Lead Plaintiffs, Lead Plaintiffs' Counsel, the Claims Administrator, or other Person designated by Lead Plaintiffs' Counsel, Defendants, or Defendants' Counsel based on distributions made substantially in accordance with the Stipulation and the Settlement contained therein, the Plan of Allocation, or further orders of the Court.

#### **SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES**

Nominees who purchased Aurora common stock on the New York Stock Exchange during the Class Period for beneficial owners who are Settlement Class Members are directed to: (i) request within seven (7) calendar days of receipt of the Postcard Notice sufficient copies of the Postcard Notice from the Claims Administrator to forward to all such beneficial owners; or (ii) send a list of the names and addresses (including email addresses if available) of such beneficial owners to the Claims Administrator within seven (7) calendar days after receipt of the Postcard Notice. If a nominee elects to send the Postcard Notice to beneficial owners, such nominee is directed to email or mail (where an email is unavailable) the Postcard Notice within seven (7) calendar days of receipt of those documents from the Claims Administrator, and upon such emailing or mailing, the nominee shall send a statement to the Claims Administrator confirming that the emailing or mailing was made as directed, and the nominee shall retain the list of names and addresses for use in connection with any possible future notice to the Settlement Class. Upon full compliance with these instructions, including the timely emailing or mailing of the Postcard Notice to beneficial owners, such nominees may seek reimbursement of their reasonable expenses actually incurred in complying with these instructions by providing the Claims Administrator with proper documentation supporting the expenses for which reimbursement is sought and reflecting compliance with these instructions. Reasonable out of-pocket expenses actually incurred in connection with the foregoing includes up to \$0.03 per record for providing names, addresses, and email addresses to the Claims Administrator; up to a maximum of \$0.03 per Postcard Notice mailed by you, plus postage at the rate used by the Claims Administrator; or \$0.03 per Postcard Notice sent by email. Such properly documented expenses incurred by nominees in compliance with the terms of these instructions will be paid from the Settlement Fund. Copies of this Notice may also be obtained by calling toll-free 877-495-6308, and may be downloaded from the Settlement website, [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com).

*Aurora Cannabis Securities Litigation*  
Claims Administrator  
c/o JND Legal Administration  
P.O. Box 91320  
Seattle, WA 98111  
[www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com)

DATED: October 10, 2024

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BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

# PROOF OF CLAIM AND RELEASE FORM

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

*In re Aurora Cannabis Inc. Securities Litigation*

No. 2:19-cv-20588-BRM-JBC

**This Form Must Be Postmarked (if Mailed) or Received (if Submitted Online) No Later than:  
February 27, 2025**

Please Type or Print

REMEMBER TO ATTACH COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS IN AURORA COMMON STOCK ON THE NEW YORK STOCK EXCHANGE. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM OR RESULT IN REJECTION OF YOUR CLAIM.

## CONTENTS

- 02** GENERAL INSTRUCTIONS
- 04** PART I. CLAIMANT IDENTIFICATION
- 05** PART II. SCHEDULE OF TRANSACTIONS IN AURORA COMMON STOCK ON THE NEW YORK STOCK EXCHANGE
- 06** RELEASE OF CLAIMS AND SIGNATURE

## I. GENERAL INSTRUCTIONS

1. To recover as a Settlement Class Member based on the claims in the Litigation,<sup>1</sup> you must complete and, on page 8 hereof, sign this Proof of Claim. If you fail to submit a properly addressed (as set forth in paragraph 3 below) Proof of Claim, your claim may be rejected and you may be precluded from any recovery from the Net Settlement Fund created in connection with the proposed Settlement.

2. Submission of this Proof of Claim, however, does not assure that you will share in the proceeds of the Settlement of the Litigation.

3. **YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, ON OR BEFORE FEBRUARY 27, 2025, ADDRESSED AS FOLLOWS:**

*Aurora Cannabis Securities Litigation*  
Claims Administrator  
c/o JND Legal Administration  
P.O. Box 91320  
Seattle, WA 98111

Online Submissions: [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com)

If you are NOT a Settlement Class Member, as defined in the Notice of Pendency and Proposed Settlement of Class Action (“Notice”), DO NOT submit a Proof of Claim.

4. If you are a Settlement Class Member and you do not timely request exclusion from the Settlement Class, you are bound by the terms of any judgment entered in the Litigation, including the releases provided therein, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM.

## II. CLAIMANT IDENTIFICATION

You are a Member of the Settlement Class if you purchased Aurora Cannabis Inc. (“Aurora”) common stock on the New York Stock Exchange between October 23, 2018 and February 28, 2020, inclusive (the “Class Period”), and are not otherwise excluded from the Settlement Class.

Use Part I of this form entitled “Claimant Identification” to identify each purchaser of record (“nominee”) of Aurora common stock that forms the basis of this claim. THIS PROOF OF CLAIM MUST BE SUBMITTED BY THE ACTUAL BENEFICIAL PURCHASER(S) OR THE LEGAL REPRESENTATIVE OF SUCH PURCHASER(S) OF AURORA COMMON STOCK UPON WHICH THIS CLAIM IS BASED.

All joint purchasers must sign this Proof of Claim. Executors, administrators, guardians, conservators, and trustees must complete and sign this claim on behalf of persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The last four digits of the Social Security (or full taxpayer identification) number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

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<sup>1</sup> This Proof of Claim and Release (“Proof of Claim”) incorporates by reference the definitions in the Stipulation of Settlement (“Stipulation”), which can be obtained at [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com).

### III. CLAIM FORM

Use Part II of this form entitled “Schedule of Transactions in Aurora Common Stock on the New York Stock Exchange” to supply all required details of your transaction(s). If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

On the schedules, provide all of the requested information with respect to **all** of your purchases and sales of Aurora common stock on the New York Stock Exchange that took place between October 23, 2018 and May 27, 2020, inclusive, whether such transactions resulted in a profit or a loss. You must also provide all of the requested information with respect to the number of shares of Aurora common stock you held at the close of trading on February 28, 2020 and on May 27, 2020. Failure to report all such transactions may result in the rejection of your claim.

List each transaction separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

The date of covering a “short sale” is deemed to be the date of purchase of Aurora common stock. The date of a “short sale” is deemed to be the date of sale of Aurora common stock.

**COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS IN AURORA COMMON STOCK ON THE NEW YORK STOCK EXCHANGE MUST BE ATTACHED TO YOUR PROOF OF CLAIM. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM OR RESULT IN REJECTION OF YOUR CLAIM.**

**NOTICE REGARDING ELECTRONIC FILES:** Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. All such claimants **MUST** also submit a manually signed paper Proof of Claim whether or not they also submit electronic copies. If you wish to submit your claim electronically, you must contact the Claims Administrator at [AURSecurities@jndla.com](mailto:AURSecurities@jndla.com) to obtain the required file layout. No electronic files will be considered to have been properly submitted unless the Claims Administrator issues to the claimant a written acknowledgment of receipt and acceptance of electronically submitted data.



# PART I – CLAIMANT IDENTIFICATION

Last Name	MI	First Name
<input type="text"/>	<input type="text"/>	<input type="text"/>

Last Name (Co-Beneficial Owner)	MI	First Name (Co-Beneficial Owner)
<input type="text"/>	<input type="text"/>	<input type="text"/>

- Individual (includes joint owner accounts)     Corporation     Pension Plan     IRA/401k  
 Estate     Trust     UGMA Custodian     Partnership     Other (please specify):

Company Name (Beneficial Owner – If Claimant is not an Individual) or Custodian Name if an IRA

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account #/Fund # (Not Necessary for Individual Filers)

Social Security Number (Last 4 digits)	OR	Taxpayer Identification Number (Last 4 digits)
<input type="text"/>		<input type="text"/>

Telephone Number (Primary Daytime)	Telephone Number (Alternate)
<input type="text"/>	<input type="text"/>

Email Address

Street Address 1

Street Address 2

City	State	Zip Code
<input type="text"/>	<input type="text"/>	<input type="text"/>

Foreign Province	Foreign Postal Code	Foreign Country Name/Abbreviation
<input type="text"/>	<input type="text"/>	<input type="text"/>

# PART II – SCHEDULE OF TRANSACTIONS IN AURORA COMMON STOCK ON THE NEW YORK STOCK EXCHANGE

<b>A. Number of shares of Aurora common stock purchased on the New York Stock Exchange held at the open of trading on October 23, 2018:</b>				<b>Proof of Position Enclosed</b>  <input type="checkbox"/> Yes <input type="checkbox"/> No
<div style="border: 1px solid black; width: 250px; height: 25px; margin: 0 auto;"></div>				
<b>B. Purchases of Aurora common stock on the New York Stock Exchange (October 23, 2018 through May 27, 2020, inclusive):<sup>2</sup></b>				
Trade Date(s) Month Day Year (List chronologically)	Number of Shares Purchased	Purchase Price Per Share	Total Purchase Price (Excluding commissions, taxes and fees)	Proof of Purchase/Acquisition Enclosed
/ /		\$	\$	<input type="checkbox"/> Yes <input type="checkbox"/> No
/ /		\$	\$	<input type="checkbox"/> Yes <input type="checkbox"/> No
/ /		\$	\$	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>IMPORTANT:</b> (i) If any purchase listed covered a “short sale,” please mark Yes: <input type="checkbox"/> Yes (ii) If you received shares through an acquisition or merger at some date beginning October 23, 2018 through May 27, 2020, please identify the date, the share amount, and the company acquired:  <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">                     / /                      MM DD YYYY                 </div> <div style="text-align: center;">                     _____                      Merger Shares                 </div> <div style="text-align: center;">                     _____                      Company                 </div> </div>				
<b>C. Sales of Aurora common stock on the New York Stock Exchange (October 23, 2018 through May 27, 2020, inclusive):</b>				
Trade Date Month Day Year	Number of Shares Sold	Sale Price Per Share	Total Sales Price (Excluding commissions, taxes and fees)	Proof of Sale Enclosed
/ /		\$	\$	<input type="checkbox"/> Yes <input type="checkbox"/> No
/ /		\$	\$	<input type="checkbox"/> Yes <input type="checkbox"/> No
/ /		\$	\$	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>D. Number of shares of Aurora common stock purchased on the New York Stock Exchange held at the close of trading on May 27, 2020:</b>				<b>Proof of Position Enclosed</b>  <input type="checkbox"/> Yes <input type="checkbox"/> No
<div style="border: 1px solid black; width: 250px; height: 25px; margin: 0 auto;"></div>				

<sup>2</sup> Information requested about your purchases of Aurora common stock on the New York Stock Exchange on February 29, 2020 through and including May 27, 2020, is needed only in order for the Claims Administrator to confirm that you have reported all relevant transactions. Purchases during this period are not eligible for a recovery because they were made outside of the Class Period.

**YOU MUST READ AND SIGN THE RELEASE ON PAGE 8. FAILURE TO SIGN THE RELEASE MAY RESULT IN A DELAY IN PROCESSING OR THE REJECTION OF YOUR CLAIM.**

#### **IV. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS**

I (We) submit this Proof of Claim under the terms of the Stipulation described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the District of New Jersey, with respect to my (our) claim as a Settlement Class Member and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Litigation. I (We) agree to furnish additional information to the Claims Administrator to support this claim if requested to do so. I (We) have not submitted any other claim covering the same purchases or sales of Aurora common stock on the New York Stock Exchange during the relevant period and know of no other person having done so on my (our) behalf.

#### **V. RELEASE**

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever settle, release, and discharge from the Released Claims each and all of the “Defendants’ Released Persons,” defined as any or all of Defendants and the Former Defendants and/or any or all of their related parties, including, without limitation, any and all of their current or former parents, subsidiaries, affiliates, predecessors, successors, divisions, funds, joint ventures, and general or limited partnerships, and each of their respective current or former officers, directors, trustees, partners, members, contractors, auditors, principals, agents, managing agents, employees, attorneys, accountants, investment bankers, commercial bankers, financial or investment advisors, consultants, advisors, underwriters, insurers in their capacities as such, as well as each of the Defendants’ and Former Defendants’ immediate family members, heirs, executors, personal or legal representatives, estates, beneficiaries, predecessors, successors, legatees, devisees, administrators, spouses, receivers and trustees, settlors, auditors, accountants, and assigns, as well as any trust of which any of the Defendants or Former Defendants is the settlor or which is for the benefit of any of the Defendants or Former Defendants and/or member(s) of his family, and any person, firm, trust, corporation, officer, director or other individual or entity in which any of the Defendants or Former Defendants has a controlling interest or which is related to or affiliated with any of the Defendants or Former Defendants.

2. “Released Claims” means any and all claims, rights, and causes of action of every nature and description, including, duties, obligations, demands, losses, actions, debts, sums of money, suits, contracts, agreements, judgments, matters, issues, promises, damages and liabilities, whether known or unknown, contingent or non-contingent, suspected or unsuspected, discoverable or undiscoverable, concealed or hidden, liquidated or unliquidated, accrued or unaccrued, at law or in equity, whether class or individual in nature, whether arising under federal or state statutory or common law or any other law, rule or regulation, whether foreign or domestic, that have been asserted, could have been asserted, or could be asserted in the future, in any forum, whether foreign or domestic, against any or all of Defendants’ Released Persons that arise out of or are based upon or relate in any way to: (i) the Litigation, including any claims, causes of action, allegations, acts, transactions, facts, events, matters, occurrences, regulatory filings, statements, representations, disclosures, or omissions that were or could have been set forth, alleged, or referenced in the Litigation; and (ii) the purchase of Aurora common stock on the New York Stock Exchange at any time during the Class Period. “Released Claims” does not include claims to enforce the Settlement or any derivative or ERISA claims. Nor does it include the claims of any Person who submits a request for exclusion in connection with this

Settlement that is accepted by the Court. “Released Claims” includes “Unknown Claims” as defined below. “Released Claims” does not include claims which are alleged in *Landry v. Aurora Cannabis Inc., et al.*, pending in the Court of King’s Bench of Alberta, Canada (“Canadian Action”) to the extent that such claims are based upon the purchase of Aurora stock on an exchange or market other than the New York Stock Exchange. For the avoidance of doubt, to the extent a class member or putative class member in the Canadian Action purchased Aurora stock on the New York Stock Exchange and another exchange or market, such claims are released to the extent they are based upon the purchase of Aurora stock on the New York Stock Exchange.

3. “Unknown Claims” means (a) any and all Released Claims which any of the Releasing Plaintiff Parties do not know or suspect to exist in his, her, or its favor at the time of the release of the Released Defendant Parties, which, if known by him, her, or it, might have affected his, her, or its settlement with and release of the Released Defendant Parties, or might have affected his, her, or its decision(s) with respect to the Settlement, including, but not limited to, whether or not to object to this Settlement or seek exclusion from the Settlement Class; and (b) any and all Released Defendants’ Claims that any of the Released Defendant Parties do not know or suspect to exist in his, her, or its favor at the time of the release of Plaintiffs, the Settlement Class, and Lead Plaintiffs’ Counsel, which, if known by him, her, it, or them, might have affected his, her, its, or their settlement and release of Plaintiffs, the Settlement Class, and Lead Plaintiffs’ Counsel. With respect to (a) any and all Released Claims against the Released Defendant Parties, and (b) any and all Released Defendants’ Claims against Plaintiffs, the Settlement Class, and Lead Plaintiffs’ Counsel, the Settling Parties stipulate and agree that, upon the Effective Date, the Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have expressly waived, the provisions, rights, and benefits of California Civil Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

The Settling Parties shall expressly waive, and each Releasing Plaintiff Party and Released Defendant Party shall be deemed to have, and by operation of the Judgment shall have, expressly waived any and all provisions, rights, and benefits conferred by any law of any state or territory of the United States, or principle of common law, which is similar, comparable, or equivalent to California Civil Code §1542. The Releasing Plaintiff Parties and Released Defendant Parties acknowledge that they may hereafter discover facts, legal theories, or authorities in addition to or different from those which he, she, it, or their counsel now knows or believes to be true with respect to the subject matter of the Released Claims or Released Defendants’ Claims, but (a) the Releasing Plaintiff Parties shall expressly fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Releasing Plaintiff Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Claims against the Released Defendant Parties, known or unknown, suspected or unsuspected, contingent or non-contingent, accrued or unaccrued, whether or not concealed or hidden, which now exist, or heretofore have existed, or may hereafter exist, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law, or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities, and (b) the Released Defendant Parties shall expressly fully, finally, and forever waive, compromise, settle, discharge, extinguish, and release, and each Released Defendant Party shall be deemed to have waived, compromised, settled, discharged, extinguished, and released, and upon the Effective

Date, and by operation of the Judgment shall have waived, compromised, settled, discharged, extinguished, and released, fully, finally, and forever, any and all Released Defendants' Claims against Lead Plaintiffs, the Settlement Class, and Lead Plaintiffs' Counsel, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts, legal theories, or authorities. The Settling Parties acknowledge, and the Releasing Plaintiff Parties and Released Defendant Parties shall be deemed by operation of the Judgment to have acknowledged, that the foregoing waiver was separately bargained for and is an essential element of the Settlement of which this release is a part.

4. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.

5. I (We) hereby warrant and represent that I (we) have included information about all of my (our) transactions in Aurora common stock on the New York Stock Exchange that occurred during the relevant period as well as the number of shares held by me (us) at the close of trading on February 28, 2020 and May 27, 2020.

I (We) declare under penalty of perjury under the laws of the United States of America that all of the foregoing information supplied on this Proof of Claim by the undersigned is true and correct.

Executed this \_\_\_\_\_ day of \_\_\_\_\_  
(Month/Year)

in \_\_\_\_\_  
(City) (State/Country)

\_\_\_\_\_  
Sign your name here Date

\_\_\_\_\_  
Type or print your name here

***If the claimant is other than an individual, or is not the person completing this form, the following also must be provided:***

\_\_\_\_\_  
Signature of Co-Beneficial Owner Date

\_\_\_\_\_  
Type or print name of Co-Beneficial Owner

\_\_\_\_\_  
Capacity of person(s) signing, e.g., Beneficial Purchaser, Executor or Administrator

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.  
THANK YOU FOR YOUR PATIENCE.**

# REMINDER CHECKLIST



1. Please sign the above release and acknowledgment.

2. Remember to attach copies of supporting documentation.



3. **Do not send** originals of certificates or other documentation as they will not be returned.



4. Keep a copy of your Proof of Claim and all supporting documentation for your records.

5. If you desire an acknowledgment of receipt of your Proof of Claim, please send it Certified Mail, Return Receipt Requested.



6. If you move, please send your new address to the address below.

7. **Do not use red pen or highlighter** on the Proof of Claim or supporting documentation.



**THIS PROOF OF CLAIM MUST BE SUBMITTED ONLINE OR MAILED NO LATER THAN FEBRUARY 27, 2025, ADDRESSED AS FOLLOWS:**

***Aurora Cannabis Securities Litigation***  
**Claims Administrator**  
**c/o JND Legal Administration**  
**P.O. Box 91320**  
**Seattle, WA 98111**

**Online Submissions: [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com)**

# EXHIBIT C



*In re Aurora Cannabis Inc. Securities Litigation No. 2:19-cv-20588-BRM-JBC (N.J)*

Name of Security: Aurora Cannabis Inc. common stock

Class Period: October 23, 2018 and February 28, 2020, both dates inclusive.

Settlement Class Criteria: **ALL PERSONS AND ENTITIES WHO PURCHASED AURORA CANNABIS INC. (“AURORA” OR THE “COMPANY”) COMMON STOCK ON THE NEW YORK STOCK EXCHANGE BETWEEN OCTOBER 23, 2018 AND FEBRUARY 28, 2020, INCLUSIVE (THE “SETTLEMENT CLASS”)**

To Whom It May Concern,

The Court directed that the Postcard be provided to you because you or someone in your family or an investment account for which you serve as a custodian may have purchased or otherwise acquired Aurora Cannabis Inc. common stock. The Court has directed us to send you the Notice because, as a potential Settlement Class Member, you have a right to know about your options before the Court rules on the proposed Settlement. Additionally, you have the right to understand how the Action and the proposed Settlement generally affects your legal rights. Please Note: The Court may approve the proposed Settlement with such modifications as the Parties may agree to, if appropriate, without further notice to the Settlement Class.

**PLEASE READ THE NOTICE CAREFULLY AND IN ITS ENTIRETY. The Notice explains how members of the Settlement Class will be affected by the Settlement. The following table provides a brief summary of the rights you have as a Settlement Class Member, and the relevant deadlines, which are described in more detail later in the Notice.**

**If you have any questions about the Notice, the Settlement, or your eligibility to participate in the Settlement, please DO NOT contact the Court, The Clerk’s Office, the Defendants, or Defendant’s counsel. All questions should be directed to Lead Counsel (see page 11 of the Notice of Pendency found on the case website) or the Claims Administrator (see below).**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
<b>SUBMIT A CLAIM FORM ON OR BEFORE FEBRUARY 27, 2025</b>	The only way to be eligible to receive a payment from the Settlement. <b>Proofs of Claim must be postmarked or submitted online on or before February 27, 2025. The Proof of Claim is available on the website.</b>
<b>EXCLUDE YOURSELF FROM THE SETTLEMENT CLASS</b>	Get no payment. This is the only option that potentially allows you to ever be part of any other lawsuit against the Defendants or any other Defendants’ Released Persons about the legal claims being resolved by this Settlement. Should you elect to exclude yourself



<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
<b>ON OR BEFORE JANUARY 6, 2025</b>	from the Settlement Class, you should understand that Defendants and the other Released Defendant Parties will have the right to assert any and all defenses they may have to any claims that you may seek to assert, including, without limitation, the defense that any such claims are untimely under applicable statutes of limitations and statutes of repose. <b>Exclusions must be postmarked on or before January 6, 2025.</b>
<b>OBJECT ON OR BEFORE JANUARY 6, 2025</b>	Write to the Court about why you do not like the Settlement, the Plan of Allocation, and/or the request for attorneys' fees and expenses. You will still be a Member of the Settlement Class. <b>Objections must be received by the Court and counsel on or before January 6, 2025. If you submit a written objection, you may (but do not have to) attend the hearing.</b>
<b>GO TO THE HEARING ON JANUARY 28, 2025 AT 2:00 P.M.</b>	Ask to speak in Court about the fairness of the Settlement. <b>Requests to speak must be received by the Court and counsel on or before January 6, 2025.</b>
<b>DO NOTHING</b>	Receive no payment. You will, however, still be a Member of the Settlement Class, which means that you give up your right to ever be part of any other lawsuit against the Defendants or any other Released Defendant Parties about the legal claims being resolved by this Settlement and you will be bound by any judgments or orders entered by the Court in the Litigation.

Regards,

*Aurora Cannabis Securities Litigation*

Claims Administrator

c/o JND Legal Administration

P.O. Box 91320

Seattle, WA 98111

**Email:** [info@AuroraCannabisSecuritiesLitigation.com](mailto:info@AuroraCannabisSecuritiesLitigation.com)

**Website:** [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com)

**Phone:** 1-877-495-6308

# **EXHIBIT D**

NEW HIGHS AND LOWS

The following explanations apply to the New York Stock Exchange, NYSE Arca, NYSE American and Nasdaq Stock Market stocks that hit a new 52-week intraday high or low in the latest session. % CHG-Daily percentage change from the previous trading session.

Table with columns: Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg. Includes sections for 'Highs' and 'Lows'.

Bonds | wsj.com/market-data/bonds/benchmarks

Global Government Bonds: Mapping Yields

Yields and spreads over or under U.S. Treasuries on benchmark two-year and 10-year government bonds in selected other countries; arrows indicate whether the yield rose (▲) or fell (▼) in the latest session.

Table showing bond yields and spreads for various countries (Australia, France, Germany, Italy, Japan, Spain, U.K.) with columns for Coupon, Maturity, Yield, Spread, and Change.

Corporate Debt

Prices of firms' bonds reflect factors including investors' economic, sectoral and company-specific expectations

Investment-grade spreads that tightened the most...

Table showing investment-grade spreads for issuers like Citigroup, KeyBank, Sumitomo Mitsui Financial, General Motors, Bank of Nova Scotia, Societe Generale, Northwestern Mutual Global Funding, and Credit Agricole.

...And spreads that widened the most

Table showing widened spreads for Cooperatieve Rabobank, Pfizer, and Norfolk Southern.

High-yield issues with the biggest price increases...

Table showing high-yield issues for DISH DBS, Liberty Interactive, Hughes Satellite Systems, Transocean, Mauser Packaging Solutions Holding, Teva Pharmaceutical Finance Netherlands III, Telecom Italia Capital, and Bath & Body Works.

...And with the biggest price decreases

Table showing price decreases for Cleveland-Cliffs, Navient, Paramount Global, VF, Yum! Brands, Teva Pharmaceutical Finance Netherlands III, HAT Holdings I, and Occidental Petroleum.

\*Estimated spread over 2-year, 3-year, 5-year, 10-year or 30-year hot-run Treasury; 100 basis points=one percentage pt.; change in spread shown is for 2-spread. Note: Data are for the most active issue of bonds with maturities of two years or more

Macro & Market Economics

Watching the Gauges: U.S. Supply and Demand

Inventories, imports and demand for the week ended October 25. Current figures are in thousands of barrels or thousands of gallons per day, except natural-gas figures, which are in billions of cubic feet. Natural-gas import and demand data are available monthly only.

Table with two main sections: 'Inventories, 000s barrels' and 'Imports, 000s barrels per day'. Each section has columns for Current, Expected change, Previous week, Year ago, 4-week avg, and 5-year avg.

Weekly Demand, 000s barrels per day

Table showing weekly demand for Total petroleum, Finished motor gasoline, Kerosene-type jet fuel, Distillates, Residual fuel oil, Propane/propylene, and Other oils.

Note: Expected changes are provided by Dow Jones Newswires' survey of analysts. Previous and average inventory data are in millions. Sources: FactSet; Dow Jones Market Data; U.S. Energy Information Administration; Dow Jones Newswires

Table with columns: Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg, Stock, Sym, 52-Wk % Hi/Lo, Chg. Lists various stocks and their performance.

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CLASS ACTION

LEGAL NOTICE

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

In re AURORA CANNABIS INC. SECURITIES LITIGATION. This Document Relates To: ALL ACTIONS.

TO: ALL PERSONS AND ENTITIES WHO PURCHASED AURORA CANNABIS INC. ("AURORA") COMMON STOCK ON THE NEW YORK STOCK EXCHANGE BETWEEN OCTOBER 23, 2018 AND FEBRUARY 28, 2020, INCLUSIVE ("SETTLEMENT CLASS") OR "SETTLEMENT CLASS MEMBERS"

THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.

YOU ARE HEREBY NOTIFIED that a hearing will be held on January 28, 2025, at 2:00 p.m., before the Honorable James B. Clark, III at the United States District Court, District of New Jersey, Frank R. Lautenberg Post Office & U.S. Courthouse, 2 Federal Square, Newark, New Jersey 07102, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned Litigation as set forth in the Stipulation of Settlement ("Stipulation") for \$8.05 million in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the Litigation with prejudice; (3) to award Lead Plaintiffs' Counsel attorneys' fees and expenses out of the Settlement Fund (as defined in the Notice of Pendency and Proposed Settlement of Class Action ("Notice"), which is discussed below and, if so, in what amounts; (4) to reimburse Lead Plaintiffs for their time and expenses in connection with their representation of the Settlement Class and, if so, in what amounts; and (5) the Plan of Allocation should be approved by the Court as fair, reasonable, and adequate.

There exists the possibility that the Court may decide to conduct the Settlement Hearing by video or telephonic conference, or otherwise allow Settlement Class Members to appear at the hearing by telephone or videoconference, without further written notice to the Settlement Class. In order to determine whether the date and time of the Settlement Hearing have changed, or whether Settlement Class Members must or may participate by telephone or video, it is important that you monitor the Court's docket and the website, www.AuroraCannabisSecuritiesLitigation.com, before making any plans to attend the Settlement Hearing. Any updates regarding the Settlement Hearing, including any changes to the date or time of the hearing or updates regarding in-person or telephonic appearances at the hearing, will also be posted to that website. Also, if the Court requires or allows Settlement Class Members to participate in the Settlement Hearing by telephone or videoconference, the access information will be posted to the website, www.AuroraCannabisSecuritiesLitigation.com.

IF YOU PURCHASED AURORA COMMON STOCK ON THE NEW YORK STOCK EXCHANGE BETWEEN OCTOBER 23, 2018 AND FEBRUARY 28, 2020, INCLUSIVE, YOUR RIGHTS ARE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION.

To share in the distribution of the Net Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form ("Proof of Claim") by mail (postmarked no later than February 27, 2025) or electronically via

www.AuroraCannabisSecuritiesLitigation.com 1-877-495-6308

THE WALL STREET JOURNAL. BANKRUPTCIES

THE MARKETPLACE ADVERTISE TODAY (800) 366-3975 For more information visit: wsj.com/classifieds. UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION. NOTICE OF (I) HEARING TO CONSIDER APPROVAL OF DISCLOSURE STATEMENT, CONFIRMATION OF THE PREPACKAGED CHAPTER 11 PLAN AND RELATED MATTERS AND (II) OBJECTION DEADLINE WITH RESPECT THERETO. PLEASE TAKE NOTICE THAT: On September 20, 2024 (the "Petition Date"), Red River Talk LLC, a Texas limited liability company (the "Debtor"), filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of Texas (the "Court").

# Notice of Proposed Settlement of Class Action Involving All Persons and Entities who Purchased Aurora Cannabis Inc. Common Stock Between October 23, 2018 and February 28, 2020, Inclusive

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NEWS PROVIDED BY  
**JND Legal Administration** →  
Nov 07, 2024, 09:17 ET

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SEATTLE, Nov. 7, 2024 /PRNewswire/ --

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

In re AURORA CANNABIS INC. ) No. 2:19-cv-20588-BRM-JBC  
SECURITIES LITIGATION )  
\_\_\_\_\_ ) CLASS ACTION  
)  
This Document Relates To: ) SUMMARY NOTICE OF PROPOSED  
ALL ACTIONS. ) SETTLEMENT OF CLASS ACTION  
)  
\_\_\_\_\_ )

**TO: ALL PERSONS AND ENTITIES WHO PURCHASED AURORA CANNABIS INC. ("AURORA") COMMON STOCK ON THE NEW YORK STOCK EXCHANGE BETWEEN OCTOBER 23, 2018 AND FEBRUARY 28, 2020, INCLUSIVE ("SETTLEMENT CLASS" OR "SETTLEMENT CLASS MEMBERS")**

**THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.**

YOU ARE HEREBY NOTIFIED that a hearing will be held on January 28, 2025, at 2:00 p.m., before the Honorable James B. Clark, III at the United States District Court, District of New Jersey, Frank R. Lautenberg Post Office & U.S. Courthouse, 2 Federal Square, Newark, New Jersey 07102, to determine whether: (1) the proposed settlement (the "Settlement") of the above-captioned Litigation as set forth in the Stipulation of Settlement ("Stipulation")[1] for \$8.05 million in cash should be approved by the Court as fair, reasonable, and adequate; (2) the Judgment as provided under the Stipulation should be entered dismissing the Litigation with prejudice; (3) to award Lead Plaintiffs' Counsel attorneys' fees and expenses out of the Settlement Fund (as defined in the Notice of Pendency and Proposed Settlement of Class Action ("Notice"), which is discussed below) and, if so, in what amounts; (4) to reimburse Lead Plaintiffs for their time and expenses in connection with their representation of the Settlement Class and, if so, in what amounts; and (5) the Plan of Allocation should be approved by the Court as fair, reasonable, and adequate.

There exists the possibility that the Court may decide to conduct the Settlement Hearing by video or telephonic conference, or otherwise allow Settlement Class Members to appear at the hearing by telephone or videoconference, without further written notice to the Settlement Class. In order to determine whether the date and time of the Settlement Hearing have changed, or whether Settlement Class Members must or may participate by telephone or video, it is important that you monitor the Court's docket and the website, [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com), before making any plans to attend the Settlement Hearing. Any updates regarding the Settlement Hearing, including any changes to the date or time of the hearing or updates regarding in-person or telephonic appearances at the hearing, will also be posted to that website. Also, if the Court requires or allows Settlement Class Members to participate in the Settlement Hearing by telephone or videoconference, the access information will be posted to the website, [www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com).

IF YOU PURCHASED AURORA COMMON STOCK ON THE NEW YORK STOCK EXCHANGE BETWEEN OCTOBER 23, 2018 AND FEBRUARY 28, 2020, INCLUSIVE, YOUR RIGHTS ARE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION.

To share in the distribution of the Net Settlement Fund, you must establish your rights by submitting a Proof of Claim and Release form ("Proof of Claim") by mail (**postmarked no later than February 27, 2025**) or electronically via the website (**no later than February 27, 2025**). Failure to submit your Proof of Claim by February 27, 2025, will subject your claim to rejection and preclude you from receiving any of the recovery in connection with the Settlement of this Litigation. If you purchased Aurora common stock on the New York Stock Exchange between October 23, 2018 and February 28, 2020, inclusive, and do not request exclusion from the Settlement Class, you will be bound by the Settlement and any judgment and releases entered in the Litigation, including, but not limited to, the Judgment, whether or not you submit a Proof of Claim.

The Notice, which more completely describes the Settlement and your rights thereunder (including your right to object to the Settlement), the Proof of Claim, the Stipulation (which, among other things, contains definition for the defined terms used in this Summary Notice), and other important documents, may be accessed online at **[www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com)**, or by writing to or calling:

*Aurora Cannabis Securities Settlement*

Claims Administrator  
c/o JND Legal Administration  
P.O. Box 91320  
Seattle, WA 98111  
Telephone: 1-877-495-6308

Inquiries should NOT be directed to Aurora, Defendants, the Court, or the Clerk of the Court.

Inquiries, other than requests for the Notice or for a Proof of Claim, may be made to Lead Counsel:

ROBBINS GELLER RUDMAN & DOWD LLP

Ellen Gusikoff Stewart  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 1-800-449-4900  
**[settlementinfo@rgrdlaw.com](mailto:settlementinfo@rgrdlaw.com)**

Lucas Gilmore

715 Hearst Avenue, Suite 300

Berkeley, CA 94710

Telephone: 1-510-725-3000

**lucasg@hbsslaw.com**

If you desire to be excluded from the Settlement Class, you must submit a request for exclusion such that it is **postmarked by January 6, 2025**, in the manner and form explained in the notice. All Settlement Class Members will be bound by the Settlement even if they do not submit a timely proof of claim.

If you are a Settlement Class Member, you have the right to object to the Settlement, the plan of allocation, the request by Lead Plaintiffs' Counsel for an award of attorneys' fees not to exceed 25% of the \$8.05 million settlement amount, litigation expenses not to exceed \$150,000, plus interest on both amounts, or awards to lead plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4). Any objections must be filed with the court and sent to Lead Counsel and Defendants' Counsel **by January 6, 2025**, in the manner and form explained in the notice.

BY ORDER OF THE COURT  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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<sup>1</sup> The Stipulation can be viewed and/or obtained at **[www.AuroraCannabisSecuritiesLitigation.com](http://www.AuroraCannabisSecuritiesLitigation.com)**.

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