

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN A. ERLANDSON and JAMES IAN
NORRIS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

TRITERRAS, INC. (f/k/a NETFIN
HOLDCO), NETFIN ACQUISITION
CORP., TRITERRAS FINTECH PTE. LTD.,
MVR NETFIN LLC, RICHARD MAURER,
MARAT ROSENBERG, VADIM
KOMISSAROV, GERALD PASCALE,
SRINIVAS KONERU, JAMES H. GROH,
ALVIN TAN, JOHN A. GALANI,
MATTHEW RICHARDS, VANESSA
SLOWEY and KENNETH STRATTON,

Defendants.

Civil Action No. 7:20-cv-10795-CS

CLASS ACTION

DECLARATION OF JAMES IAN NORRIS
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF
SETTLEMENT AND APPROVAL OF THE
PLAN OF ALLOCATION AND FOR AN
AWARD OF ATTORNEYS' FEES AND
EXPENSES AND AN AWARD TO
PLAINTIFFS PURSUANT TO
15 U.S.C. §77z-1(a)(4)

I, JAMES IAN NORRIS, declare as follows:

1. I am the Additional Plaintiff in this action (the “Action”). I respectfully submit this Declaration in support of the motion for final approval of settlement, approval for an award of attorneys’ fees and litigation expenses and charges, and my request for an award in connection with my involvement as the Additional Plaintiff in the prosecution and resolution of the Action. I have personal knowledge of the facts as set forth herein and, if called as a witness, I could and would competently testify thereto.

2. I joined this action as part of the Amended Class Action Complaint, filed on July 6, 2021. I authorized the law firm of Levi & Korsinsky, LLP (“Levi Korsinsky”) to represent me as Additional Plaintiff and in support of the already-appointed Lead Counsel firm Robbins Geller Rudman & Dowd LLP (“Robbins Geller”).

3. From the outset of my joining this action, I received regular updates from Levi Korsinsky and was kept apprised of key decisions before they were made relating to litigating and resolving this Action for the benefit of the Class. As part of this process, I kept abreast of significant factual developments involving Triterras and remained informed of counsel’s investigative efforts. I reviewed updates on case strategy and read the draft and final versions of the amended complaint. I also discussed with Levi Korsinsky the range of recoverable damages and reviewed drafts of the mediation statement. Additionally, I stayed informed on the status of preparing the settlement documentation. In short, I devoted time to monitoring this litigation and counsel’s efforts on behalf of the Class.

4. Through my involvement as the Additional Plaintiff, as well as my continuous discussions with Levi Korsinsky, I developed an understanding of the strengths and weaknesses of the claims alleged in this Action and am aware of the potential hurdles class members would face moving

forward in litigation. Based on this understanding, I strongly support presentation of the settlement to the Court for approval.

5. I have also discussed with Levi Korsinsky and support its request to this Court for a fee award of one-third of the settlement amount, plus an award of litigation expenses and charges. I believe the settlement represents a favorable result for the Class and understand that Robbins Geller has not yet received any compensation for its work as Lead Counsel.


6. Lastly, under 15 U.S.C. §77z-1(a)(4) of the PSLRA, I respectfully request an award in the amount of \$10,000 for the efforts I expended in serving as the Additional Plaintiff. As set forth above, I worked closely with counsel in achieving a favorable outcome for all Class members and believe that I faithfully discharged my obligations as the Additional Plaintiff by acting as a steward for the Class.

7. I am currently employed with the United States Department of State as a Special Agent. I have been working for the Department of State in different capacities for the past fourteen (14) years. Prior to my employment with the Department of State, I was a Navy SEAL Officer with the Naval Special Warfare division of the United States Navy from 1996 to 2003.

8. From the start of my involvement in this Action in July 2021 through the date of this submission (over a year later), I represented and advanced the Class's interests. My communications with Levi Korsinsky were typically handled in the late evenings or weekends. As explained above, this time involved interfacing with Levi Korsinsky on the preparation of the amended complaint, litigation strategy, assessing damages, and preparing for mediation.

9. Accordingly, I respectfully seek an award in the amount of \$10,000 in connection with the efforts I dedicated to this Action, as outlined in more detail above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 1, 2022.



JAMES IAN NORRIS

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 2, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Joseph Russello

JOSEPH RUSSELLO

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Mailing Information for a Case 7:20-cv-10795-CS Ferraiori v. Triterras, Inc. et al

Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)