

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN A. ERLANDSON and JAMES IAN	:	Civil Action No. 7:20-cv-10795-CS
NORRIS, Individually and on Behalf of All	:	
Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiffs,	:	SUPPLEMENTAL DECLARATION OF
	:	ROSS D. MURRAY REGARDING NOTICE
vs.	:	DISSEMINATION AND REQUESTS FOR
	:	EXCLUSION RECEIVED TO DATE
	:	
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.	:	
	:	
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I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. Pursuant to this Court’s May 20, 2022 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”) (ECF 60), Gilardi was appointed to supervise and administer the notice procedure as well as the processing of claims in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”). I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

2. I submit this declaration as a supplement to my earlier declaration, the Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date (ECF 70) (the “Initial Mailing Declaration”). The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

UPDATE ON DISSEMINATION OF THE CLAIM PACKAGE

3. As more fully detailed in the Initial Mailing Declaration, as of July 29, 2022, Gilardi had mailed 40,243 copies of the Court-approved Notice of Pendency and Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package”) to potential Class Members and their nominees. *See* Initial Mailing Declaration, ¶11.

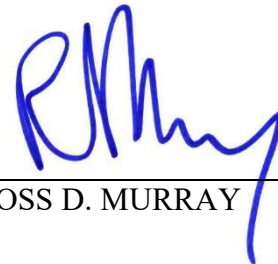
4. Since July 29, 2022, Gilardi has mailed an additional 19 copies of the Claim Package in response to requests from potential Class Members, brokers, and nominees and as a result of mail returned as undeliverable for which new addresses were identified and re-mailed to those new addresses. Therefore, as of August 29, 2022, Gilardi has mailed a total of 40,262 Claim Packages to potential Class Members and nominees.

REQUESTS FOR EXCLUSION RECEIVED TO DATE

5. Pursuant to the Notice Order, the Notice informed potential Class Members that written requests for exclusion from the Class must be mailed to *Triterras Securities Settlement*, Claims Administrator, c/o Gilardi & Co. LLC, EXCLUSIONS, 150 Royall Street, Suite 101, Canton, MA 02021, such that they are postmarked no later than August 16, 2022. At the time of the Initial Mailing Declaration, Gilardi had not received any requests for exclusion in connection with this Settlement. *See* Initial Mailing Declaration, ¶16.

6. Since the Initial Mailing Declaration was executed, and as of the date of this declaration, Gilardi has received one request for exclusion, a redacted copy of which is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 29th day of August, 2022, at San Rafael, California.



ROSS D. MURRAY

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 30, 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

ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Email: jrusello@rgrdlaw.com

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

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

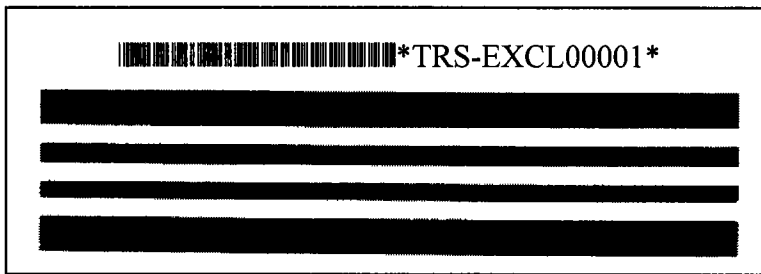
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- **Bradley Joseph Bondi**
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- **Dana B. Klinges**
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- **Charles H. Linehan**
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- **William A. Massa**
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- **Theodore J. Pinter**
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- **Samuel Howard Rudman**
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- **Joseph Frank Russello**
jrussello@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,jrussello@ecf.courtdrive.com

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)

EXHIBIT A



RECEIVED
August 19, 2022
Claims Center

Exclusion Cover Page

Case Name: Triterras, Inc. Securities Settlement

Case Code: TRS

Exclusion Deadline: August 16, 2022 (Postmarked on or before)

Name of Person Filing Exclusion: Clayton Levi Brown

TRITERRAS SECURITIES SETTLEMENT
CLAIMS ADMINISTRATOR
c/o Gilardi & Co. LLC
P.O. Box 43339
Providence, RI 02940-3339



ERLANDSON V. TRITERRAS, INC, ET AL. LAWSUIT FORM

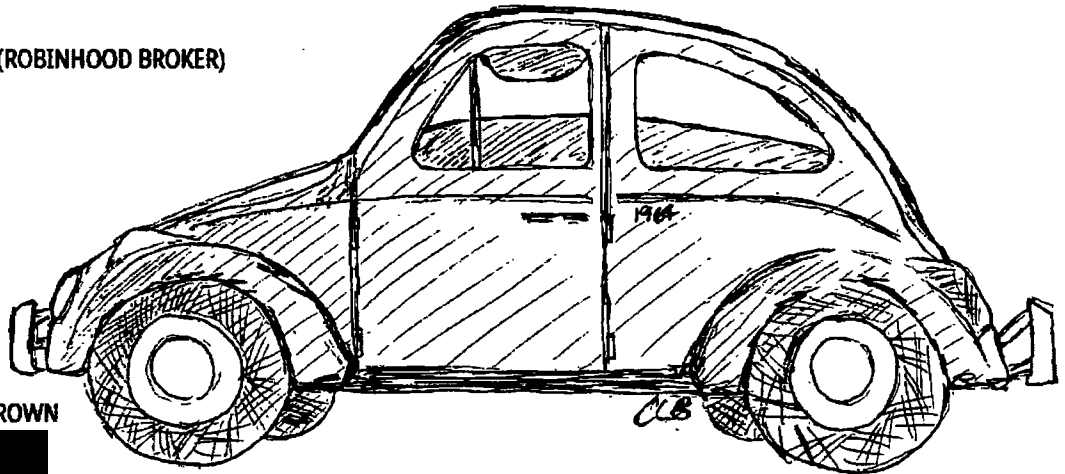
"REQUEST EXCLUSION FROM THE CLASS IN ERLANDSON V. TRITERRAS, INC., ET AL., NO. 7:20-CV-10795-CS (S.D.N.Y.)"

TRADE INFORMATION >

PURCHASE: TRITERRAS COMMON STOCK (FIDELITY BROKER)
TRADE DATE: 12/15/2020
SETTLEMENT DATE: 1/19/2021
PRICE: \$8.0968/SHARE
QTY: 50

PURCHASE: TRITERRAS OTC STOCK (ROBINHOOD BROKER)
TRADE DATE: 1/15/2021
SETTLEMENT DATE: 1/20/2021
PRICE: \$10.055/SHARE
QTY: 42

PURCHASE: TRITERRAS OTC STOCK (ROBINHOOD BROKER)
TRADE DATE: 1/28/2021
SETTLEMENT DATE: 2/1/2021
PRICE: \$7.19/SHARE
QTY: 13



PERSONAL INFORMATION >

NAME - CLAYTON LEVI BROWN
ADDRESS - [REDACTED]

SIGNATURE *Clayton Levi Brown*

" \$#! YOU! "

Robinhood 

85 Willow Rd, Menlo Park, CA 94025
 help@robinhood.com

01/28/2021

Clayton Brown Account # 

Equities/Options	B/S	Trade Date	Settle Date	Acct Type	Price	QTY	Principal	Comm	Tran Fee	Net Amount	MKT	CAP	U/S
Terras TRIT CUSIP: G9103H102	B	01/28/2021	02/01/2021	M	\$7.1900	13	\$93.47	\$0.00	\$0.00	\$93.47	OTC	1	U
Total Quantity Bought:			13	Total Dollars Bought:						\$93.47			
Total Quantity Sold:			0	Total Dollars Sold:						\$0.00			



85 Willow Rd, Menlo Park, CA 94025
 help@robinhood.com

01/15/2021

Clayton Brown Account # [REDACTED]

Equities/Options	B/S	Trade Date	Settle Date	Acct Type	Price	QTY	Principal	Comm	Trade Fee	Net Amount	MKT	CAP	U/S
Transtar TRF OSH: G9103H102	B	01/15/2021	01/20/2021		\$10.0550	42	\$422.31	\$0.00	\$0.00	\$422.31	DIC	1	U
Total Quantity Bought:		42		Total Dollars Bought:		\$422.31							
Total Quantity Sold:		0		Total Dollars Sold:		\$0.00							

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Fidelity Investments

Date	Description	Amount	Cash Balance
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YOU BOUGHT TRITERRAS INC COM USD0.0001 CL A ISIN # (TRIRF) (Cash) X

Symbol	TRIRF
Description	TRITERRAS INC COM USD0.0001 CL A ISIN #
Shares	+ 45.000
Price	8.096
Amount	-\$364.32
Settlement Date	01/21/2021

01/19/2021	YOU BOUGHT TRITERRAS INC COM USD0.0001 CL A ISIN # (TRIRF) (Cash)	-\$40.48	-\$460.14
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YOU BOUGHT TRITERRAS INC COM USD0.0001 CL A ISIN # (TRIRF) (Cash) X

Symbol	TRIRF
Description	TRITERRAS INC COM USD0.0001 CL A ISIN #
Shares	+ 5.000
Price	8.0968
Amount	-\$40.48
Settlement Date	01/21/2021



Fidelity Investments

Description	Amount
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GHT TRITERRAS INC COM USD0.0001 CL A ISIN # (TRIRF) (Cash)

TRIRF
 TRITERRAS INC COM USD0.0001 CL A ISIN #
 + 45.000
 8.096
 -\$364.32

Date 01/21/2021

YOU BOUGHT TRITERRAS INC COM USD0.0001 CL A ISIN # (TRIRF) (Cash) -\$40.48

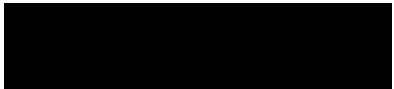
GHT TRITERRAS INC COM USD0.0001 CL A ISIN # (TRIRF) (Cash)

TRIRF
 TRITERRAS INC COM USD0.0001 CL A ISIN #
 + 5.000
 8.0968
 -\$40.48

Date 01/21/2021



Clayton L. Br.



AUG 19 2022

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Triterras Securities Settlement
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 43339
Providence, RI 02940-3339

02940-333939



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