

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>
	:	
Plaintiff,	:	DECLARATION OF JOHN A.
	:	ERLANDSON IN SUPPORT OF
vs.	:	PLAINTIFFS' MOTION FOR FINAL
	:	APPROVAL OF SETTLEMENT AND
TRITERRAS, INC. (f/k/a NETFIN	:	APPROVAL OF THE PLAN OF
HOLDCO), NETFIN ACQUISITION CORP.,	:	ALLOCATION AND FOR AN AWARD OF
TRITERRAS FINTECH PTE. LTD., MVR	:	ATTORNEYS' FEES AND EXPENSES AND
NETFIN LLC, RICHARD MAURER,	:	AN AWARD TO PLAINTIFFS PURSUANT
MARAT ROSENBERG, VADIM	:	TO 15 U.S.C. §77z-1(a)(4)
KOMISSAROV, GERALD PASCALE,	:	
SRINIVAS KONERU, JAMES H. GROH,	:	
ALVIN TAN, JOHN A. GALANI,	:	
MATTHEW RICHARDS, VANESSA	:	
SLOWEY and KENNETH STRATTON,	:	
	:	
Defendants.	:	
	X	

I, JOHN A. ERLANDSON, declare as follows:

1. I am the Court-appointed Lead 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 a Lead 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 authorized the law firm of Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) to request this Court to appoint me as Lead Plaintiff, and the firm filed the motion on February 19, 2021. Based on my purchases and sales of Triterras, Inc. (“Triterras”) common stock, I had the largest financial interest in this Action. On April 15, 2021, this Court appointed me as Lead Plaintiff and approved my selection of Robbins Geller as Lead Counsel under the Private Securities Litigation Reform Act of 1995 (“PSLRA”).

3. From my appointment onward, I received regular updates from Robbins Geller and was involved in making key decisions 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 Robbins Geller’s investigative efforts. I reviewed detailed updates on case strategy and read the draft and final versions of the amended complaint, which supplemented the theory of this Action from that alleged (by a different plaintiff) in the initial complaint. I also discussed with Robbins Geller the range of potentially recoverable damages and reviewed the mediation statement. Additionally, I remained available for consultation during the mediation, reviewed updates on the progress of negotiations, and stayed informed on the status of preparing the settlement documentation. I also reviewed factual developments affecting Triterras

even after the parties reached an agreement-in-principle to resolve the Action. In short, I devoted a substantial amount of time to monitoring this litigation and Robbins Geller's efforts on behalf of the Class.

4. Through my involvement as Lead Plaintiff, as well as my continuous discussions with Robbins Geller, I developed an understanding of the strengths and weaknesses of the claims alleged in this Action and am aware of obstacles to class certification, summary judgment, proving loss causation, and establishing and recovering damages. Based on this understanding, I strongly support presentation of the settlement to the Court for approval.

5. I have also discussed with Robbins Geller 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 Lead Plaintiff. As set forth above, I worked closely with Robbins Geller in achieving a favorable outcome for all Class members and believe that I faithfully discharged my obligations as Lead Plaintiff by acting as a steward for the Class. In that capacity, I frequently dedicated time to this Action instead of dedicating attention to income-producing activities.

7. I currently offer consulting services to brand management and licensing companies and institutions. For the past two years, my usual and customary rate has been \$1,000 per hour. Before performing consulting work, I was an executive at Authentic Brands Group ("Authentic Brands"), a company based in New York City which specializes in brand development, marketing, licensing, and entertainment, and manages a variety of well-known brands. From 2016 until 2020, I

was the Chief Revenue Officer of Authentic Brands, and, before that, was Executive Vice President of Sports.

8. From the start of my involvement in this Action in January 2021 through the date of this submission (over a year-and-a-half later), I reasonably estimate that I spent well over 16 hours in representing and advancing the Class's interests. I did many of these tasks during normal working hours, when Robbins Geller would typically communicate with me, or over weekends when I could have performed consulting work instead (given the nature of my engagements). This estimate is based on my records, as well as Robbins Geller's records of communicating with me. As explained above, this time involved interfacing with Robbins Geller on the lead plaintiff process, the factual investigation, preparation of the amended complaint, litigation strategy, assessing damages, choosing a mediator and conducting mediation, negotiating settlement terms and settlement documentation, and monitoring factual developments after 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 that the foregoing is true and correct. Executed on July 25, 2022, at Budd Lake, New Jersey.



JOHN A. ERLANDSON

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)