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7 *Counsel for Class Representative Aric Olsen*

8 [Additional Counsel Listed on Signature Page]

Electronically
FILED

By Superior Court of California, County of San Mateo
ON 06/29/2022

By /s/ Jimenez, Vanessa
Deputy Clerk

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RECEIVED
6/21/2022

CLERK OF THE SUPERIOR COURT
SAN MATEO COUNTY

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN MATEO**

12 ARIC OLSEN and JAMES ALPHA MULTI) Lead Case No. 20-CIV-01918
STRATEGY ALTERNATIVE INCOME) (Consolidated with Case No. 20-CIV-02276)
13 PORTFOLIO, Individually and On))
Behalf of All Others Similarly Situated,) **STIPULATION AND ~~PROPOSED~~**) **ORDER REGARDING DISSEMINATION**)
14) **OF CLASS NOTICE**)
15 Plaintiffs,))
16 v.))
17 ZUORA, INC., et al.,) Assigned for all purposes to:
18 Defendants.) Honorable Danny Y. Chou, Dept. 22
Date Action Filed: April 17, 2020

28 **DYC**

1 WHEREAS, a class action is currently pending in the United States District Court for the
2 Northern District of California captioned *Roberts v. Zuora, Inc.*, Case No. 3:19-cv-03422-SI (N.D.
3 Cal.) (“Federal Action”), that asserts claims for false and misleading statements under Section 10(b)
4 of the Securities Exchange Act of 1934 and SEC Rule 10b-5 promulgated thereunder against Zuora,
5 Inc., Tien Tzuo, and Tyler Sloat (collectively, “Federal Action Defendants”);

6 WHEREAS, there is currently a related action pending in the Superior Court of California for
7 the County of San Mateo captioned *Olsen v. Zuora, Inc.*, Lead Case No. 20-CIV-01918 (Cal. Super.
8 Ct., Cnty. of San Mateo) (“State Action”), that asserts claims for false and misleading statements
9 contained in Zuora, Inc.’s initial public offering registration statement and prospectus under Sections
10 11 and 15 of the Securities Act of 1933 against Zuora, Inc., Tien Tzuo, Tyler Sloat, Peter Fenton,
11 Kenneth A. Goldman, Timothy Haley, Jason Pressman, Michelangelo Volpi, Magdalena Yesil,
12 Goldman Sachs & Co. LLC, Morgan Stanley & Co. LLC, Allen & Company LLC, Jefferies LLC,
13 Canaccord Genuity LLC, and Needham & Company, LLC (collectively, “State Action Defendants”)
14 (the Federal Action Defendants and the State Action Defendants are collectively referred to as
15 “Defendants”);

16 WHEREAS, by court order dated March 15, 2021, the Federal Action was certified as a class
17 action on behalf of the following class: “All persons or entities who purchased or otherwise acquired
18 publicly-traded common stock of defendant Zuora, Inc. during the period from April 12, 2018 to May
19 30, 2019 and who were damaged” (the “Federal Class”);

20 WHEREAS, by court order dated October 14, 2021, the State Action was certified as a class
21 action on behalf of the following class: “All persons and entities who purchased or otherwise acquired
22 shares of Zuora, Inc. common stock pursuant or traceable to the Registration Statement and Prospectus
23 issued in connection with Zuora’s April 12, 2018 initial public offering” (the “State Class” and,
24 together with the Federal Class, the “Classes”);

25 WHEREAS, class representative New Zealand Methodist Trust Association (“MTA”) in the
26 Federal Action and class representative Aric Olsen (“Olsen”) in the State Action have met and
27 conferred among themselves and with Defendants and have mutually agreed, as a matter of judicial
28 economy and convenience to all parties and class members, to publish a *single* class certification notice

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1 for both the Federal Action and the State Action to be disseminated to the Classes only after (1) both
2 the Federal Action and the State Action were certified as class actions, and (2) the parties in both
3 actions participated in a joint mediation (the “Class Certification Notice Conditions”);

4 WHEREAS, the parties in the Federal Action and the State Action have participated in a joint
5 mediation and the Class Certification Notice Conditions have otherwise been satisfied; and

6 WHEREAS, the parties to both actions have met and conferred and have agreed on the form
7 of the notice to be sent to the Classes, which is attached hereto as **Exhibit A**;

8 IT IS HEREBY STIPULATED AND AGREED by the parties in both actions, through their
9 undersigned counsel, and subject to the approval by the court presiding over the Federal Action as well
10 as subject to the approval by the court presiding over the State Action, that:

11 1. On March 15, 2021, the court presiding over the Federal Action certified the Federal
12 Action as a class action under Rule 23 of the Federal Rules of Civil Procedure (Dkt. No. 113).

13 2. The Federal Class consists of:

14 All persons or entities who purchased or otherwise acquired publicly-
15 traded common stock of defendant Zuora, Inc. during the period from
16 April 12, 2018 to May 30, 2019 and who were damaged.

16 Excluded from the Federal Class are:

17 (i) [Federal Action] Defendants; (ii) members of the immediate family
18 of Defendants Tien and Sloat; (iii) any person who was an officer or
19 director of Zuora; (iv) any firm or entity in which any [Federal Action]
20 Defendant has or had a controlling interest; (v) any person who
21 participated in the wrongdoing alleged; (vi) [Federal Action]
22 Defendants’ liability insurance carriers; (vii) any affiliates, parents, or
23 subsidiaries of Zuora; (viii) all Zuora plans that are covered by ERISA;
24 and (ix) the legal representatives, agents, affiliates, heirs, beneficiaries,
25 successors-in-interest, or assigns of any excluded person or entity, in
26 their respective capacity as such. (Dkt. 100-1).

23 3. On October 14, 2021, the court presiding over the State Action certified the State Action
24 as a class action (Stip. and Order re: Class Certification dated Oct. 14, 2021).

25 4. The State Class consists of:

26 All persons and entities who purchased or otherwise acquired shares of
27 Zuora, Inc. common stock pursuant or traceable to the Registration
28 Statement and Prospectus issued in connection with Zuora’s April 12,

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1 2018 initial public offering.

2 Excluded from the State Class are:

3 [State Action] Defendants, the officers and directors of Zuora, Inc.,
4 members of their immediate families and their legal representatives,
5 heirs, successors, or assigns, and any entity in which [State Action]
6 Defendants have a majority ownership interest.

7 5. The proposed procedures for giving notice to the Classes of the pending class actions
8 in the Federal Action and the State Action as set forth in this Stipulation and [Proposed] Order comply
9 with the requirements of due process, Rule 23 of the Federal Rules of Civil Procedure, California Code
10 of Civil Procedure § 382, and constitute the best notice practicable under the circumstances.

11 6. The firm of Epiq Class Action & Claims Solutions, Inc. (“Notice Administrator”) is
12 appointed and authorized to supervise and administer the class action notice procedure.

13 7. No later than ten (10) business days after the entry of an order approving this stipulation
14 in both the Federal Action and the State Action, Defendants shall cause Zuora, Inc.’s securities transfer
15 agent to produce, to the Notice Administrator (at no cost to the MTA, Olsen, class counsel in the
16 Federal Action and State Action, or the Notice Administrator) a list, in electronic form, of the names
17 and addresses of all persons who purchased or otherwise acquired Zuora, Inc. common stock at any
18 time during the period between April 12, 2018, and April 17, 2020, both dates inclusive (the “Transfer
19 List”).

20 8. No later than forty-five (45) business days after the approval and entry of this stipulation
21 in both the Federal Action and the State Action, the Notice Administrator shall send, by first class mail
22 in an envelope marked “United States District Court and Superior Court of the State of California for
23 the County of San Mateo,” the agreed-upon proposed Notice of Pendency of Class Action (“Notice”),
24 substantially in the form attached hereto as **Exhibit A**, to each person or entity identified on the
25 Transfer List (“Notice Date”). For all Notices returned as undeliverable, the Notice Administrator
26 shall use best efforts to locate updated addresses.

27 9. The Notice Administrator shall use reasonable efforts to give notice to nominee
28 purchasers such as brokerage firms and other persons and entities who may have purchased or acquired
29 Zuora, Inc. common stock between April 12, 2018 and April 17, 2020, both dates inclusive, for the
30 DYC

1 beneficial interest of persons or entities other than themselves. Such nominees shall either (i) within
2 fourteen (14) calendar days of receipt of the Notice, request from the Notice Administrator sufficient
3 copies of the Notice to forward to all such beneficial owners and within fourteen (14) calendar days of
4 receipt of those Notices forward them to all such beneficial owners; or (ii) within fourteen (14) calendar
5 days of receipt of the Notice, provide a list of the names and addresses of all such beneficial owners
6 to the Notice Administrator and the Notice Administrator is ordered to send the Notice promptly to
7 such identified beneficial owners. Nominees who elect to send the Notice to the beneficial owners
8 shall send a statement to the Notice Administrator confirming that the mailing was made and shall
9 retain their mailing records for use in connection with any further notices that may be provided in the
10 actions. The Notice Administrator shall follow up with brokers and custodians to ensure the Notice is
11 sent to beneficial owners in a timely manner. Upon full and timely compliance with these directions,
12 such nominees may seek reimbursement of their reasonable expenses actually incurred by providing
13 the Notice Administrator with proper documentation supporting the expenses for which reimbursement
14 is sought.

15 10. Contemporaneously with the mailing of the Notice, the Notice Administrator shall
16 establish a website for the Action, www.ZuoraSecuritiesLitigation.com, from which members of the
17 Federal Class and the State Class may download copies of the Notice, the Summary Notice, the
18 operative complaints in the Federal Action and the State Action, the Defendants' answers to the
19 operative complaints in the Federal Action and the State Action, the courts' orders certifying the
20 Federal Class and the State Class, and this Stipulation and Order.

21 11. Within ten (10) business days after the Notice Date, the Notice Administrator shall
22 cause the Summary Notice, substantially in the form attached hereto as **Exhibit B**, to be published in
23 *The Wall Street Journal* and *Investor's Business Daily* and to be transmitted over PR Newswire.

24 12. The Notice shall provide an address for the purpose of receiving requests for exclusion
25 from the Federal Class, the State Class, or both and requests for additional copies of the Notice. The
26 requests for exclusion from the Classes shall be made by submitting a written request for exclusion as
27 set forth in the Notice and shall be postmarked within sixty (60) calendar days after the Notice Date
28 ("Exclusion Date").

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1 13. The Notice Administrator shall identify and number all exclusion requests received and
2 create copies of those requests for counsel for all parties involved in the Federal Action and the State
3 Action. The Notice Administrator shall provide via email weekly reports of exclusion requests
4 received to counsel for all parties in the Federal Action and the State Action. The Notice Administrator
5 will maintain original requests in its files.

6 14. No later than twenty-five (25) business days after the Exclusion Date, class counsel for
7 MTA in the Federal Action and class counsel for Olsen in the State Action shall file in their respective
8 actions proof of mailing of the Notice, proof of publication of the Summary Notice, and an affidavit
9 setting forth a list of all persons and entities who have requested exclusion from the Federal Class, the
10 State Class, or both.

11 15. Except for the costs associated with obtaining Zuora, Inc.'s Transfer List, the costs of
12 the notice process shall be borne by MTA and Olsen, and not by Defendants.

13 16. This Order may be modified by the court in the Federal Action and/or the court in the
14 State Action upon motion by the parties to that action, but only for good cause shown.

15 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

16 DATED: June 21, 2022

BOTTINI & BOTTINI, INC.
Francis A. Bottini, Jr.
Yury A. Kolesnikov

18 
19 _____
Yury A. Kolesnikov


20 7817 Ivanhoe Avenue, Suite 102
21 La Jolla, California 92037
22 Telephone: (858) 914-2001
23 Facsimile: (858) 914-2002

Counsel for Class Representative Aric Olsen

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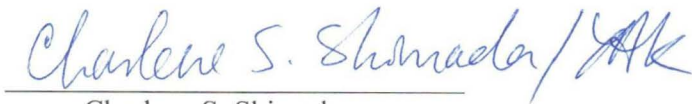
DATED: June 21, 2022

WILMER CUTLER PICKERING HALE
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San Francisco, California 94111
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Attorneys for Defendants Zuora, Inc., Tien Tzuo, Tyler Sloat, Peter Fenton, Kenneth A. Goldman, Timothy Haley, Jason Pressman, Michelangelo Volpi, and Magdalena Yesil

DATED: June 21, 2022

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Facsimile: (415) 442-1001

Attorneys for Defendants Goldman Sachs & Co. LLC, Morgan Stanley & Co. LLC, Allen & Company LLC, Jefferies LLC, Canaccord Genuity LLC, and Needham & Company, LLC

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[PROPOSED] ORDER

Pursuant to Stipulation, **IT IS SO ORDERED.**

Electronically

SIGNED

By /s/Chou, Danny

06/28/2022

Dated: _____, 2022

THE HONORABLE DANNY Y. CHOU
JUDGE OF THE SUPERIOR COURT

EXHIBIT A

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CASEY ROBERTS, Individually and On Behalf of All Other)
Similarly Situated,)
Class action)
Plaintiff,)
v.)
ZUORA, INC., TIEN TZUO, and TYLER)
SLOAT,)
Defen)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN MATEO

ARIC OLSEN and JAMES LARICA and JAMES MELNO)
STRATEGY ALTERNATIVE (INCORPORATED)
PORTFOLIO, Individually and On)
Behalf of All Other)
Class action)
Plaintiffs,)
v.)
ZUORA, Inc.,)
Defens)

NOTICE OF PENDENCY OF CLASS ACTIONS

This is a Court-authorized notice. This

TO: All persons or entities who (1) purchased common stock of Zuora, Inc. during the period and/or (2) purchased or otherwise acquired pursuant or traceable to the Registration connection with Zuora's April 12, 2018 ini

PLEASE READ THIS NOTICE CAREFULLY AND IN YOUR RIGHTS MAY BE AFFECTED BY THE PENDING CLASS A

This Notice is sent to inform you that the may affect you. One is pending in the United California No. 19-cv-03422-SI

Action"). The other is pending in the Superior Court in the case captioned **O'Neil v. Zboard, Case No. 20-CIV-01918** (California) ("State Action"). This is a combined notice of the two actions, allowing them to potentially proceed as class actions.

The Federal Action asserts claims under Sections 10(b) and 1934 and SEC Rule 10b-5 promulgated thereunder (collectively, "Federal Action Defendants"). The New Zealand Methodist Trust Association ("New Zealand Methodist Trust") alleges that between April 12, 2018 and May 30, 2019, the defendants made false and misleading statements and omissions about

By order dated March 15, 2021, the court certified the Federal Action as a class action on behalf of the following persons who owned or otherwise acquired publicly-traded common stock of Zboard from April 12, 2018 to May 30, 2019 and who were

The State Action asserts claims under Section 11 of the Securities Act of 1933 against Zuora, Inc., Tien Tzuo, Tyler Sloat, Jason Pressman, Michelangelo Volpi, Magdalena Stanley & Co. LLC, Allen & Company LLC, Jeffrey Needham & Company, LLC (collectively, "State Action Defendants" and the State Action Defendants are collectively referred to as "State Action Defendants"). The State Action is brought by class representatives and alleges that the registration statement filed on April 12, 2018 in connection with the initial public offering alleged false and misleading omissions about the functionality of Zuora's

By order dated October 14, 2021, the court certified the State Action as a class action on behalf of the following persons who owned or otherwise acquired shares of Zuora, Inc. common stock from the Statement and Prospectus issued in connection with the initial public offering ("State Class") (and, together with the Federal Class, the "Classes").

This Notice is sent to you because you may be a member of the State Class (or both) and, as a result, your

THIS NOTICE IS SENT TO YOU ONLY TO APPRISE YOU OF THE ABOVE CLASS ACTIONS AND THE FACT THAT THEY HAVE BEEN CERTIFIED AS CLASS ACTIONS. THERE HAVE BEEN NO COURT DECISIONS OR RESOLUTIONS ON THE MERITS OF PLAINTIFFS' CLAIMS. YOU MAY WANT TO SUBMIT A CLAIM FORM TO SUBMIT. THERE HAS BEEN NO ADMITTANCE OR ANY EXPRESSION BY THE COURT ON THE VALIDITY OF THE CLAIMS.

If you do not wish to be a part of either class, you must respond to this Notice with (as per the law) re

SUMMARY OF YOUR OPTIONS	
Do nothing	<p style="text-align: center;">Stay in the lawsuits.</p> <p>By doing nothing, you keep the any recovery that may result of either the Federal Class, as through trial(s) or settlement give up any right you may have separately about the same fact legal claims being raised in t bound by the outcome of the ac jury or decided by the court. settlement, then you will have opt out or exclude yourself fr</p>
Ask to be excluded from the Federal Class, both by sending for exclusion p than _____	<p style="text-align: center;">Get out of the lawsuits. Get the State Class, or If you ask to be excluded from the State Class, you will happen in these actions and v might have to sue Defendants factual circumstances and lega these lawsuits. If a recovery cases, either through trial(s) not share in any such recovery</p>

I. OVERVIEW AND STATUS OF THE ACTIONS

A. Federal Action

The Federal Action is brought by the Federal Methodist Trust Association, who is represented by Class Counsel”). The action asserts claims under 1934 and SEC Rule 10b-5 promulgated thereunder.

The Federal Action was filed on June 14, 2018. The court denied the Federal Action Defendants’ motion for summary judgment and the court certified the action as a class action. The entities who purchased or otherwise acquired shares of Tien and Sloat, Inc. during the period from April 12, 2018 to June 14, 2018 from the Class are: (i) [Federal Action] Defendants Tien and Sloat; (iii) any person who purchased or entity in which any [Federal Action] Defendant who participated in the wrongdoing alleged; (

carriers; (vii) any affiliates, parents, or subsidiaries by ERISA; and (ix) the legal representatives, heirs, successors, interest, or assigns of any excluded person or entity.

The Federal Action alleges that between April 12, 2018 and April 17, 2020, Defendants issued allegedly false and misleading statements of the nature of Zuora's cloud-based subscription management software application products, Zuora Billing, and Zuora Connect.

Federal Action Defendants deny all allegations of the Federal Action and deny any liability whatsoever to any member of the class.

The case is ongoing and there has been no opportunity to obtain a copy of the operative complaint, the proposed class certification, [and the Settlements Litigation](#).

B. State Action

The State Action is brought by the State of California represented by Bottini & Bottini, Inc. ("State Action") under Sections 11 and 15 of the Securities Act of 1933 and Sections 11 and 15 of the Securities Act of 1934.

The State Action was filed on April 17, 2020. In a 2020 court decision, the court upheld the claims under Sections 11 and 14, 2021, the court certified the State Action as a class action. "All persons and entities who purchased or otherwise acquired Zuora pursuant or traceable to the Registration Statement filed by Zuora's April 12, 2018 initial public offering." Defendants, the officers and directors of Zuora, and their legal representatives, heirs, successors, and assigns. Defendants have a majority ownership interest in Zuora.

The State Action alleges that the registration statement filed with Zuora's April 12, 2018 initial public offering contained statements and omissions about the integrated business model.

State Action Defendants deny all allegations of the State Action and deny any liability whatsoever to any member of the class.

The case is ongoing and there has been no opportunity to obtain a copy of the operative complaint, the proposed class certification, [and the Settlements Litigation](#).

C. Is there any money available now?

No. There have been no settlements and there is no guarantee of the validity of the plaintiffs' claims. As stated above, the case is ongoing.

There is no guarantee that money or any other assets are available.

If you choose to remain in the Classes and or settlement(s), then you will be notified a

II. CLASS COUNSEL

Your interests in the Federal Action are Representative and the Federal Class Counsel.

Steve Berman	Lucas E. Gilmore
HAGENBERG, SOBOSHAPIRO LLP	HAGENBERG, SOBOSHAPIRO LLP
1301 Second Avenue, Suite 2000	1500 4th Avenue, Suite 2000
Seattle, WA 98101	Berkeley, CA 94710
Telephone: (206) 623-7292	Telephone: (510) 725-0594
Facsimile: (206) 623-0594	Facsimile: (510) 725-0594
steve@hbsslaw.c	lucasg@hbsslaw.com

Your interests in the State Action are being represented by Francis A. Bottini, Jr. and Yury A. Kolesnikov and the State Class Counsel. Their contact information is as follows:

Francis A. Bottini, Jr.
Yury A. Kolesnikov
BOTTINI & BOTTINI, INC
7817 Ivanhoe Avenue, Suite 102
La Jolla, CA 92037
Telephone: (858) 914-2001
Facsimile: (858) 914-2002
fbottini@bottinilaw.com
ykolesnikov@bottinilaw.com

If you want to be represented by your own attorney, you must file a notice of appearance in both the Federal and State courts. If you do retain your own attorney, such counsel must also be mailed to the Federal court (and your counsel must also be mailed to the State court if your case may be) at the addresses listed above by

III YOUR RIGHTS AND OPTIONS AS A CLASS MEMBER

A class action is a type of lawsuit in which a plaintiff brings claims on behalf of all members of a group of persons seeking monetary or other relief for the benefit of the group. Each class member having to file his, her, or its own lawsuit are used to decide legal and factual issues that affect the group.

The federal court certified the Federal Class if you purchased or otherwise used Zuora during the period from April 1, 2012, to August 31, 2018. You fall in the Federal Class exclusion described above if you

Separately, the state court also You are if iae d member of the State Class if you purchased or stock pursuant or traceable to the Registrat connection with Zuora's April 11 2018 s 2018 faultial exclusion described above.

You may be a member of both the Federal Cl

As a member of a class, you have two option

A. Do nothing and remain as a member of the F

If you are a member of the Federal Class, nothing. If you do that, you will remain in t by all orders and judgments in the actions, wh on the common issues, or if a settlement is r some recovery. If Defendants prevail or if a a lawsuit on your own behalf with regard to a

Your interests in the Federal Action are Representative and the Federal Class Counsel. represented by the State Class Representative Counsel and the State Class Counsel are repres means that they will be awarded attorneys' fee in obtaining a recovery from one or more Def awarded by the court(s) from the settlement or You will not be separately responsible for any

You may remain a member of the Classes and own choosing. If you retain separate counsel expenses, and such counsel must enter an appe

If at a later date the parties decide to exclude yourself from the cases. Absent sett yourself from the Classes or subsequent order

B. Exclude yourself from the Federal Class, t

If you want to pursue your own lawsuit or conduct in these actions, do not want to be b simply do not want to be a part of the Classe to be excluded. If you choose to exclude you you will not be bound by any orders or judgments in any recovery that might be obtained in tha

Should you choose to be excluded or, in ot State Action, or both, you may be able to indi please note that if you request exclusion fro individually, you may not be able to pursue c

limitation or repose. You may want to consult your attorney that you wish to pursue individually against the Company.

You may request exclusion from either the Class or the State Class.

IV. HOW DO I REQUEST EXCLUSION?

If you fall within the definition of the Class, you will automatically be considered a member of that Class unless you request exclusion. Any member of the Classes may request exclusion from the State Class, or both by following the procedures below.

If you wish to be excluded from the Federal Class, you must sign a letter by mail stating that you request exclusion from the Zuora, Inc. Lead Case No. 20-CIV-01918 (Cal. Super. Ct. Case No. 3:19-cv-03422-SI (N.D. Cal.)).

If you wish to be excluded from the State Class, you must sign a letter by mail stating that you "request exclusion" from the Zuora, Inc. Lead Case No. 20-CIV-01918 (Cal. Super. Ct. Case No. 3:19-cv-03422-SI (N.D. Cal.)).

Alternatively, if you wish to be excluded from the Federal Class, you must sign a letter by mail stating that you "request exclusion" from the Zuora, Inc. Lead Case No. 20-CIV-01918 (Cal. Super. Ct. Case No. 3:19-cv-03422-SI (N.D. Cal.)).

Be sure to include: (1) the name, address and telephone number of the person seeking to be excluded from the Class or Class; (2) the date and price paid for the securities purchased or otherwise acquired between April 12, 2018 and the present, including the date of the person or entity requesting exclusion.

Your request for exclusion must contain all the information requested above.

You must mail your request for exclusion to the address below on or before the date set forth below.

Zuora, Inc. Securities Litigation
c/o Epiq
EXCLUSIONS
PO Box 5530
Portland, OR 97228-5530

You cannot exclude yourself by telephone or in person.

If your request for exclusion is timely made and you have complied with the requirements set forth above, you will not be a member of the Class or Class, and you will not be eligible to participate in any later recovery, if any, in these actions. If you do not wish to share in the recovery in these actions and do not wish to share in the recovery in these actions and do not wish to share in the recovery in these actions, you should request exclusion from the Class or Class.

V. PLEASE KEEP YOUR ADDRESS CURRENT

To assist the Courts and the parties in mail update your name and contact information. You the Notice Administrator at: Zuora, Inc. Sec OR 97228-5530. If this Notice was forwarded sent to you at an address that is no longer Administrator and provide them with your current have your current address, you may not receive including, for example, any future settlement

VI. WHERE YOU CAN FIND ADDITIONAL INFORMATION

This Notice provides only a summary of the claims asserted by the Class Representatives information, including case documents and other [www.ZuoraSecurityLitigation.com](https://www.zuora.com/SecurityLitigation) contact Counsel or the State Class Counsel at the address

PLEASE DO NOT CALL OR WRITE TO THE COURTS
THE CLERK FOR INFORMATION OR ADVICE

VII NOTICE TO SECURITIES BROKERS AND OTHER

If, for the beneficial interest of any person otherwise acquired shares of Zuora, Inc. common 2020, inclusive, you must, WITHIN FOURTEEN (14) NOTICE, either: (a) request from the Notice forward to all such beneficial owners and with Notices forward them to all such beneficial owners known addresses of each person or entity for the relevant period to the Notice Administrator

If you select option (a) above, you must confirm that the mailing was made, and you connection with any further notices that may be the Notice Administrator will send a copy of communications concerning the foregoing should Zuora, Inc. Securities Litigation, c/o Epiq, Inc.

Upon full and timely compliance with these your reasonable expenses actually incurred (including postage) by providing the Notice Administrator expenses for which reimbursement is being sought

Dated: _____, 2022

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Dated:

-----, 2022

BY ORDER OF THE COURT
SUPERIOR COURT OF THE STATE OF
COUNTY OF SAN MATEO

EXHIBIT B

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CASEY ROBERTS, Individual and On Cause No. 19-cv-03422-SI
Behalf of All Other Similarly Situated,
) Class Action
) Plaintiff,
)
)
) v.)
)
ZUORA, INC., TIEN TZUO, and TYLER
SLOAT,)
)
) Defen)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN MATEO

ARIC OLSEN and JAMES LA RIVA Cause No. 20-CIV-01911
STRATEGY ALTERNATIVE (INCORPORATED) Individually and On
PORTFOLIO, Individually and On Behalf of All Other)
Behalf of All Other Similarly Situated,
) Class Action
) Plaintiffs,
)
) v.)
)
ZUORA, Inc.,)
)
) Defes)

SUMMARY NOTICE OF PENDENCY OF CLASS ACTION

To: All persons or entities who (1) purchased common stock of Zuora, Inc. during the period from approximately January 1, 2018 to the date of the filing of this lawsuit and/or (2) purchased or otherwise acquired common stock of Zuora, Inc. pursuant or traceable to the Registration Statement filed in connection with Zuora's April 12, 2018 initial public offering.

YOU ARE HEREBY NOTIFIED that the above-captioned actions are being filed as class actions on behalf of the persons and entities described above.

The Federal Arbitration Act ("FAA"), 9 U.S.C. §§ 1-16, and the Federal Arbitration Act ("FAA"), 9 U.S.C. §§ 1-16, apply to the claims under Section 10(b) of the Securities Exchange Act of 1934, as amended, and the rules promulgated thereunder against Zuora, Inc., the "Action Defendants". It is brought by class action.

Association ("Federal Class Representative").
May 30, 2019, Federal Action Defendants issued
omissions about the functionality of Zuora's

The State Action, Zuora, Case No. 20-CIV-019
Cnty. of San Mateo), asserts claims under Sect
Zuora, Inc., Tien Tzuo, Tyler Sloat, Peter Fe
Pressman, Michelangelo Volpi, Magdalena Yesil,
Co. LLC, Allen & Company LLC, Jefferies LLC,
Company, LLC (collectively, "State Action Def
State Action Defendants are collectively refe
representative Aric Olsen ("State Class Repre
statement and prospectus issued in connection
allegedly contained false and misleading stat
Zuora's products.

Defendants in the Federal Action and the S
and deny any wrongdoing. PLEASE NOTE that this
judgment, settlement, or monetary recovery in
scheduled for May 8, 2023.

IF YOU ARE A MEMBER OF THE CLASS, YOUR
AFFECTED BY THESE ACTIONS. printed Notice of P
("Notice"), which fully sets forth the rights
mailed to persons who have been identified as
received the full print www.ZuoraSecurities.com
by contacting the Notice Administrator at:

Zuora, Inc. Securities Litigation
c/o Epiq
PO Box 5530
Portland, OR 97228-5530

Your interests in the Federal Action are
Representative and the Federal Class Counsel.

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HAGENBERG SOBOSHAPIRO LLP	HAGENBERG SOBOSHAPIRO LLP
1301 Second Avenue, Suite 1500	1201 Post Avenue, Suite 1200
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Your interests in the State Action are bei
and the State Class Counsel. Their contact i

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If you are a member of one or both of the
to remain a member of the Class(es) in a member
not need to do anything at this time other than
transactions and holding shares if you are a member of
do not exclude yourself from the Class(es), y
including all past, present, and future order
unfavorable. If you move, or if the Notice w
the Notice Administrator written notification

IF YOU DO NOT WANT TO BE BOUND BY ANY ORDER
THE COURT IN ONE OR BOTH OF THE ACTIONS, YOU
EXCLUDE YOURSELF FROM THE CLASS(ES). If you request
will not be eligible to receive a share of an
the Class(es). There is no monetary relief cu
you must submit a written request for exclusion
accordance with the instructions set forth in

Further information regarding this notice
Notice Administrator at www.Zaddas.com

PLEASE DO NOT CONTACT THE COURT REGARDING

Dated: _____, 2022
BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CA

Dated: _____, 2022
BY ORDER OF THE COURT
SUPERIOR COURT OF THE STATE OF
COUNTY OF SAN MATEO

