

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE RECONNAISSANCE ENERGY
AFRICA LTD. SECURITIES
LITIGATION

Case No. 1:21-cv-06176-NRM-RM

**SUPPLEMENTAL DECLARATION OF MORGAN KIMBALL REGARDING: (A)
MAILING OF NOTICE; (B) REQUESTS FOR EXCLUSION AND OBJECTIONS; AND
(C) CLAIM FORMS RECEIVED TO DATE**

I, Morgan Kimball, declare and state as follows:

1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”). Pursuant to the Court’s August 13, 2024, Order Preliminary Approving Settlement and Providing for Notice (the “Preliminary Approval Order”), Epiq was authorized to act as the U.S. Claims Administrator in connection with the U.S. Settlement of the above-captioned action (the “Action”) (ECF No. 60, paragraph 7).¹

2. I submit this declaration as a supplement to my previously filed declaration, the Declaration of Morgan Kimball Regarding: (A) Mailing of Notice; (B) Publication of the U.S. Summary Notice; and (C) Report on Requests for Exclusion and Objections dated November 8, 2024 (ECF No. 68-1; the “Initial Mailing Declaration”).

3. The following statements are based on my personal knowledge and information provided by Epiq employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

I. DISSEMINATION OF NOTICE

4. At the time of the Initial Mailing Declaration, Epiq had mailed a total of 17,844 U.S. Postcard Notices to potential Settlement Class Members and Nominees by United States Postal Service (“USPS”) First-Class mail. Following the Initial Mailing Declaration, Epiq re-mailed 5 U.S. Postcard Notices to people whose original mailing was returned by the USPS and for whom an updated address was provided to Epiq by the USPS. As of the date of this Supplemental Declaration, a total of 17,849 U.S. Postcard Notices have been mailed to potential Settlement Class Members and Nominees by USPS First-Class mail.

¹ Unless otherwise defined herein, all capitalized terms shall have the same meaning as set forth in the Global Stipulation and Agreement of Settlement, dated February 27, 2024 (ECF No. 55-1; the “Stipulation”).

5. At the time of the Initial Mailing Declaration, Epiq had mailed a total of four (4) U.S. Notice Packets via U.S. First-Class mail to persons who requested one by phone. Following the Initial Mailing Declaration, Epiq mailed an additional 28 U.S. Notice Packets to persons who requested one by phone. As of the date of this Supplemental Declaration, a total of 32 U.S. Notice Packets have been mailed to persons who requested one by phone.

6. As of the date of this Supplemental Declaration, a total of 53 U.S. Postcard Notices remain undeliverable. Accordingly, in total, and excluding the 53 U.S. Postcard Notices that remain undeliverable, Epiq has mailed 17,828 U.S. Postcard Notices and U.S. Notice Packets to potential Settlement Class Members and Nominees by USPS First-Class mail.

II. CALL CENTER SERVICES

7. Epiq continues to maintain the toll-free telephone number for the Settlement, (888) 285-0673, which became operational on September 11, 2024.

8. As of the date of this Supplemental Declaration, Epiq has received a total of 177 calls to the toll-free number dedicated to the Settlement, including 85 that were handled by a live operator. Epiq has promptly responded to each telephone inquiry and will continue to address potential Settlement Class Members' inquiries.

III. THE SETTLEMENT WEBSITE

9. Epiq continues to maintain the Settlement Website, www.ReconAfricaUSSecuritiesSettlement.com, which became operational on or about September 11, 2024, and is accessible 24 hours-a-day, 7 days-a-week.

10. As of the date of this Supplemental Declaration, there have been 1,842 unique visitors to the Settlement Website and 7,278 page views.

IV. REQUESTS FOR EXCLUSION AND OBJECTIONS

11. Pursuant to paragraph 13 of the Preliminary Approval Order, U.S. Settlement Class Members who wished to be excluded from the U.S. Settlement Class were required to mail their written request for exclusion to Epiq so that the request was received no later than November 28, 2024.² As of the date of this Supplemental Declaration, Epiq has received one (1) request for exclusion. A redacted version of the request for exclusion is attached as Exhibit A.

12. Pursuant to the paragraph 17 of the Preliminary Approval Order, objections were to be filed with the Court on or before November 28, 2024, and served on both U.S. Lead Counsel and Defendants' Counsel so that they were received no later than November 28, 2024. As of the date of this Supplemental Declaration, Epiq has not received any misdirected objections.

V. CLAIM FORMS RECEIVED TO DATE

13. Pursuant to paragraph 10 of the Preliminary Approval Order, U.S. Settlement Class Members who wish to participate in the U.S. Settlement and to be eligible to receive a distribution from the U.S. Net Settlement Fund must complete and submit a U.S. Claim Form so that it is postmarked or submitted online no later than January 9, 2025. This deadline has not yet passed.

14. As of the date of this Supplemental Declaration, Epiq has received a total of 573 U.S. Claim Forms. Of the 573 U.S. Claim Forms received to date, 566 have been provisionally processed.

15. Of the 566 U.S. Claim Forms that Epiq has processed to date, Epiq has preliminarily determined that 371 are acceptable in whole, 152 are acceptable in part, and 43 should be wholly

² Information related to requesting exclusion, including the exclusion deadline, was set forth in the U.S. Notice and on the Settlement Website. The exclusion deadline was set forth in the U.S. Postcard Notice and U.S. Summary Notice, both of which directed U.S. Settlement Class Members to the U.S. Notice for more information on requesting exclusion or objecting.

rejected because they are either ineligible, wholly deficient, or have no Recognized Loss when calculated in accordance with the proposed Plan of Allocation.

16. The figures in paragraphs 14 and 15 are preliminary and subject to change. For example, it is Epiq's experience that the vast majority of Claims are submitted close to, or on, the Claim filing deadline. This is because most institutional investors, brokers, and other nominees typically file Claims electronically at or near the claims filing deadline.

17. Moreover, (a) the submitted Claims are subject to further analysis, audit, fraud checks, and quality assurance; and (b) some of the Claims contain deficiencies that Claimants will be given the opportunity to cure, or have been given the opportunity to cure and that process is ongoing.

I declare under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on December 9, 2024, at Seattle, Washington.


Morgan Kimball

EXHIBIT A

**PHILLIPS, GARDILL, KAISER & ALTMAYER, PLLC
LAWYERS**

JAMES C. GARDILL
CHARLES J. KAISER, JR.
H. BRANN ALTMAYER *
EDWARD M. GEORGE, III
DENISE KNOUSE-SNYDER
RICHARD N. BEAVER
J. CHRISTOPHER GARDILL
ROBERT D. PLUMBY *
ANDREW R. THALMAN ***
JACOB C. ALTMAYER **
JEFFERY D. KAISER *
BREIANNE VARNER REDD

61 FOURTEENTH STREET
WHEELING, WEST VIRGINIA 26003
TELEPHONE (304) 232-6810
FAX (304) 232-4818

JOHN D. PHILLIPS
(1906-2000)

WILLIAM A. KOLIBASH
OF COUNSEL

RAY A. BYRD
OF COUNSEL

November 26, 2024

* ALSO ADMITTED IN OH
** ALSO ADMITTED IN PA AND OH
*** ALSO ADMITTED IN PA, OH AND IN

*In Re Reconnaissance Energy Africa Ltd.
Securities Litigation, EXCLUSIONS*
c/o Epiq
P.O. Box 6929
Portland, OR 97228-6929

*Via USPS Priority Mail Express,
Next Day Delivery*

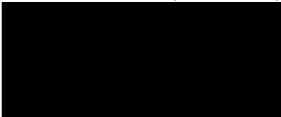
Re: *In re Reconnaissance Energy Africa Ltd. Securities Litigation,*
No. 1:21 cv 06176 NRM RML
Request for Exclusion from the U.S. Settlement Class

Greetings:

This office represents WesBanco Trust & Investment Services Tr UA Dtd 4-29-1986 with and for Edward W. Stifel, III (hereinafter the "Trust"), a class member in the herein referenced litigation. Please be advised that the Trust hereby requests exclusion from the Settlement Class in *In re Reconnaissance Energy Africa Ltd. Securities Litigation*, No. 1:21 cv 06176 NRM RML.

The Trust's contact person is:

Marnie Hedges
Senior Trust Officer
WesBanco Trust and Investment Services



The Trust purchase purchased a total of 8,000 shares within the U.S. Settlement Class Period, purchased as follows:

<u>Acquisition Date</u>	<u># of Shares</u>	<u>Purchase Price</u>
10/13/2020	1,000	\$ 847.00
11/19/2020	1,000	\$ 1,236.90
01/14/2021	1,000	\$ 2,668.40

(continued on next page)

In re Reconnaissance Energy Africa Ltd. Securities Litigation,
No. 1:21 cv 06176 NRM RML
November 26, 2024
Page 2

<u>Acquisition Date</u>	<u># of Shares</u>	<u>Purchase Price</u>
04/15/2021	1,000	\$ 4,771.15
04/19/2021	1,000	\$ 7,379.10
06/11/2021	1,000	\$ 7,375.00
06/28/2021	1,000	\$ 9,127.60
08/17/2021	1,000	\$ 4,815.00

Thank you for your attention to this letter and please feel free to contact me if any further discussion or additional information is needed.

Yours very truly


/ Jacob C. Altmeyer

Reviewed & Approved by Class Member:

WesBanco Trust & Investment Services
Tr UA Dtd 4-29-1986 with and for Edward W. Stifel, III

By 

Name: Michelle L. Dougherty

Title: SVP, Sr Trust Officer

JCA/

Cc: WesBanco Trust & Investment Services (via email only)