

EXHIBIT A

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15 Lead Counsel for Lead Plaintiff

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

18 In re APPLE INC. SECURITIES LITIGATION)

Case No. 4:19-cv-02033-YGR
CLASS ACTION

19 This Document Relates To:)

20 ALL ACTIONS.)

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DECLARATION OF ALEXANDER YOUNGER
 IN SUPPORT OF: (A) LEAD PLAINTIFF'S
 MOTION FOR FINAL APPROVAL OF
 CLASS ACTION SETTLEMENT AND
 APPROVAL OF PLAN OF ALLOCATION;
 AND (B) LEAD COUNSEL'S MOTION FOR
 AN AWARD OF ATTORNEYS' FEES AND
 EXPENSES AND AWARD TO CLASS
 REPRESENTATIVE PURSUANT TO 15
 U.S.C. §78u-4(a)(4)

DATE: September 17, 2024
 TIME: 2:00 p.m.
 JUDGE: Honorable Yvonne Gonzalez
 Rogers
 CTRM: 1, 4th Floor

1 I, Alexander Younger, declare as follows:

2 1. I am the Head of Funding and Investment for Lead Plaintiff, Norfolk
3 County Council as Administering Authority of the Norfolk Pension Fund ("Norfolk
4 Pension Fund"), and I am authorised to make this declaration. Norfolk Pension Fund is
5 a multiemployer defined benefit pension scheme with more than \$7 billion in assets
6 under management and is part of the United Kingdom's Local Government Pension
7 Scheme. I am the person at the Norfolk Pension Fund who was primarily responsible
8 for directing this litigation on behalf of Norfolk Pension Fund.

9 2. I respectfully submit this declaration in support of: (a) final approval of the
10 \$490,000,000 settlement (the "Settlement") of the Action reached between Norfolk
11 Pension Fund on behalf of the Class, and Defendants in the Action; (b) approval of Lead
12 Counsel's application for an award of attorneys' fees and expenses; and (c)
13 reimbursement of Norfolk Pension Fund's time.

14 3. On behalf of Norfolk Pension Fund, I have monitored the progress of this
15 litigation and I have regularly conferred with Robbins Geller Rudman & Dowd LLP
16 ("Robbins Geller" or "Lead Counsel") concerning the litigation and overseen the efforts
17 of Robbins Geller in prosecuting the case.

18 4. Specifically, I on behalf of Norfolk Pension Fund in its capacity as Lead
19 Plaintiff and Class Representative: (a) reviewed the pleadings and briefs submitted in
20 this matter, including pleadings related to the appointment of lead plaintiff, complaints,
21 including the operative Revised Consolidated Class Action Complaint for Violation of
22 the Federal Securities Laws, pleadings related to motions to dismiss, motions for class
23 certification, Defendants' motion for summary judgment, and Orders of the Court; (b)
24 attended court hearings in person and via zoom; (c) searched for and produced
25 documents and responded to interrogatories; and (d) regularly discussed with Lead
26 Counsel both in person and remotely the status of the case and matters of strategy. I
27 also prepared for and provided deposition testimony, reviewed the testimony of the

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DECLARATION OF ALEXANDER YOUNGER IN SUPPORT OF LEAD PLAINTIFF'S MOTION FO FINAL
APPROVAL OF SETTLEMENT - 4:19-cv-02033-YGR

1 defendants, and actively participated in settlement discussions.

2 5. Following its appointment as Lead Plaintiff, Norfolk Pension Fund
3 expended substantial time actively participating in the prosecution of this case. Norfolk
4 Pension Fund regularly corresponded with Lead Counsel and participated in reviewing
5 the complaint and the amendments thereto and participated in discovery by, among
6 other things, being deposed and collectively reviewing documents. I also reviewed the
7 class certification motions and briefs, in connection thereto, as well as the briefs and
8 declarations filed in connection with summary judgment. I also oversaw and actively
9 participated in, the settlement process by, among other things, corresponding with Lead
10 Counsel and personally attending mediation sessions..

11 6. On behalf of Norfolk Pension Fund, I evaluated the risks of continuing this
12 Action, including the possibility of a nominal recovery or no recovery at all, and
13 authorised Lead Counsel to settle this Action for \$490,000,000. Norfolk Pension Fund
14 believes this Settlement is not just fair and reasonable, but rather represents an
15 excellent recovery and is in the best interest of the members of the Class.

16 7. While Norfolk Pension Fund recognises that any determination of fees is
17 left to the Court, before seeking the appointment of lead plaintiff status, Norfolk
18 Pension Fund negotiated with Lead Counsel attorney's fee of 25%. Norfolk Pension
19 Fund believes that this settlement would not have been possible without the diligent
20 and aggressive prosecutorial provision efforts of Lead Counsel and endorses Lead
21 Counsel's application for 25% of the Settlement Fund in legal fees and expenses not to
22 exceed \$3,000,000, as fair and reasonable.


23 8. Norfolk Pension Fund also understands that payment of lead plaintiff's
24 and class representative's reasonable expenses is authorised under the applicable
25 statutory framework. Accordingly, Norfolk Pension Fund seeks reimbursement
26 pursuant to §21D(a)(4) of the PSLRA, 15 U.S.C. §78u-4(a)(4) for its time, including the
27 time for me (Alexander Younger), Robert Mayes and Charlotte Alexander, Norfolk

1 Pension Fund Accountants involved in the Action that would have otherwise been
 2 devoted to the daily operation of Norfolk Pension Fund. Although other employees,
 3 including support staff, were also involved in discovery and monitoring of this case,
 4 Norfolk Pension Fund's request for reimbursement is limited to the time expended by
 5 me and by the Accountants. A summary of the minimum time expended is as follows:

Name	Hours
6 Alexander Younger 7 Head of Funding & Investment 8 for Norfolk Pension Fund 9	400 hours Review of pleadings, relevant documents, prepare for and provide deposition testimony, correspondence, meetings and discussions regarding case strategy and oversight and settlement negotiations.
11 Robert Mayes, Charlotte 12 Alexander 13 Norfolk Pension Fund 14 Accountants	15 15 hours 16 Review of Norfolk Pension Fund's 17 financial and investment records, 18 and correspondence regarding case 19 strategy and resolution.

20 9. Norfolk Pension Fund respectfully requests that the Court grant final
 21 approval of the Settlement and approve Lead Counsel's application for an award of
 22 attorneys' fees and expenses. Norfolk Pension Fund also respectfully requests that the
 23 Court approve payment of \$29,946.40 to Norfolk Pension Fund, which based upon my,
 24 Robert Mayes' and Charlotte Alexander's overall compensation during the period of the
 25 Action represents an average rate of \$72.16 per hour for the time expended in
 26 representing Class Members in the Action.

27 I declare under penalty of perjury under the laws of the United States that the
 28 foregoing is true and correct. Executed this 12th day of July, 2024 in Norfolk, United
 Kingdom.



 ALEXANDER YOUNGER