

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MONROE COUNTY EMPLOYEES'	:	Civil Action No. 1:21-cv-00722-JPO
RETIREMENT SYSTEM, Individually and on	:	
Behalf of All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
ASTRAZENECA PLC, PASCAL SORIOT,	:	
MARC DUNOYER and MENELAS	:	
PANGALOS,	:	
	:	
Defendants.	:	
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VLADIMIR ZHUKOV, Individually and on	:	Civil Action No. 1:21-cv-00825-JPO
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
ASTRAZENECA PLC, PASCAL SORIOT,	:	
MARC DUNOYER and MENELAS	:	
PANGALOS,	:	
	:	
Defendants.	:	
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STIPULATION AND ORDER CONSOLIDATING CASES AND
APPOINTING LEAD PLAINTIFF AND LEAD COUNSEL

WHEREAS, motions for consolidation, appointment of lead plaintiff, and appointment of lead counsel were filed on the March 29, 2021 statutory deadline in the securities class actions brought pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) on behalf of investors in AstraZeneca plc (“AstraZeneca”);

WHEREAS, Nuggehalli Bamukund Nandkumar filed a motion for consolidation, appointment as lead plaintiff, and appointment of lead counsel on the statutory deadline (ECF No. 18);

WHEREAS, Wayne County Employees’ Retirement System (the “Retirement System”) filed a motion for consolidation, appointment as lead plaintiff, and appointment of lead counsel on the statutory deadline (ECF No. 22);

WHEREAS, Carol Gray filed a motion for consolidation, appointment as lead plaintiff, and appointment of lead counsel on the statutory deadline (ECF No. 12);

WHEREAS, Vinod Alluri filed a motion for consolidation, appointment as lead plaintiff, appointment of lead counsel on the statutory deadline (ECF No. 15);

WHEREAS, Mr. Alluri filed a Notice of Non-Opposition on April 5, 2021 (ECF No. 27) and Ms. Gray filed a Notice of Non-Opposition on April 12, 2021 (ECF No. 28);

WHEREAS, the Retirement System and Mr. Nandkumar each concluded that a protracted dispute concerning lead plaintiff appointment in this action is not in the best interests of the class and that jointly prosecuting this litigation together as an institutional investor with an established track record of successfully prosecuting securities class actions and an individual investor with a large financial interest would be appropriate and assist with the speedy commencement of this litigation;

WHEREAS, the Retirement System and Mr. Nandkumar agreed to resolve their competing motions and to seek, with the Court’s approval, to serve jointly as lead plaintiff; and

WHEREAS, the Retirement System and Mr. Nandkumar are committed to supervising the conduct of this litigation by their counsel and to ensuring that counsel coordinate appropriately and avoid any duplication of effort in the conduct of the litigation;

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, as follows:

1. Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, *Monroe Cty. Emps. Ret. Sys. v. AstraZeneca plc*, No. 1:21-cv-00722-JPO; and *Zhukov v. AstraZeneca plc*, No. 1:21-cv-00825-JPO, as well as any pending, subsequently filed, removed, or transferred actions that are related to the claims asserted in the above-captioned actions are CONSOLIDATED for all purposes (together, the "Consolidated Action");

2. The Consolidated Action shall be captioned "*In re AstraZeneca plc Securities Litigation*" and shall be maintained under Master File No. 1:21-cv-00722-JPO. Case number 1:21-cv-00825-JPO shall be administratively closed;

3. Pursuant to the PSLRA, 15 U.S.C. §78u-4(a)(3)(B), the Retirement System and Mr. Nandkumar are appointed as Lead Plaintiff in the Consolidated Action; and

4. Pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), Robbins Geller Rudman & Dowd LLP and Pomerantz LLP are approved as Lead Counsel in the Consolidated Action;

5. The motions at ECF Nos. 12, 15, 18, and 22 are TERMINATED AS MOOT.

DATED: April 12, 2021

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s/ David A. Rosenfeld

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Additional Counsel for Wayne County Employees'
Retirement System

DATED: April 12, 2021

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Additional Counsel for Nuggehalli Balmukund
Nandkumar

* * *

ORDER

IT IS SO ORDERED.

DATED: April 28, 2021



J. PAUL OETKEN
United States District Judge