

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

DAVID STARR, BERNADETTE
MAVRIKOS, EDMUND QUIAMBAO,
JAMES TETTENHORST, JEREMY
HANSEN, KRISTA KARO,
ARLENE REED-COSSAIRT, PETER STAVROS,
HEATHER FARKAS,

No. 8:19-cv-02173-LKG

on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

VSL PHARMACEUTICALS, INC.; LEADIANT
BIOSCIENCES, INC., F/K/A SIGMA-TAU
PHARMACEUTICALS, INC.; and ALFASIGMA
USA, INC.,

Defendants.

PLAINTIFFS' MOTION FOR APPROVAL OF CLASS NOTICE PLAN

Plaintiffs David Starr, Bernadette Mavrikos, Edmund Quiambao, James Tettenhorst, Jeremy Hansen, Krista Karo, Arlene Reed-Cossairt, Peter Stavros, and Heather Farkas, on behalf of themselves and all others similarly situated (collectively, the “Plaintiffs”), by and through undersigned counsel, respectfully move this Court for entry of an order¹ approving the proposed Class Notice Plan (the “Notice Plan”) pursuant to Fed. R. Civ. P. 23(c)(2)(B) and for appointment of Angeion Group, LLC (“Angeion”) as the Notice Administrator in this case.

As more fully set forth in the accompanying Memorandum in Support of Plaintiffs’ Motion for Approval of Class Notice Plan (the “Memorandum in Support”), Plaintiffs have designed a

¹ A proposed order is being submitted contemporaneously with this Motion.

Notice Plan that fully meets the requirements of Fed. R. Civ. P. 23 and Due Process. Specifically (and as more fully set forth in the Memorandum in Support), the Notice Plan contemplates direct notice either by email or U.S. mail to many Class Members,² a targeted online media campaign to notify Class Members about the case, and a Notice Website from which Class Members may obtain more information about the case. Moreover, the notices in the Notice Plan are written in “plain, easily understood language” and contain all the information required by Fed. R. Civ. P. 23. The notices contain all information necessary to enable Class Members to make informed decisions about their participation in the action, including a description of the litigation, this Court’s certification order, and the Class Members’ options and rights. The Notice Plan also sets out a procedure for Class Members to exclude themselves from the Classes, including a simplified online opt-out form on the Notice Website. Significantly, the Parties agree as to the substance of the Notices.

Moreover, Plaintiffs respectfully request that this Court appoint Angeion as the Notice Administrator in this case.

WHEREFORE, for all the foregoing reasons and the reasons more fully set forth in the accompanying Memorandum in Support, Plaintiffs respectfully request that the Court: (1) grant this Motion; (2) approve the Notice Plan; (3) appoint Angeion as Notice Administrator in this case; (4) direct that notice be made in this case consistent with the Notice Plan; and (5) grant such further relief that is necessary and just.

[SIGNATURE PAGE TO FOLLOW]

² Any capitalized term not otherwise defined herein has the meaning ascribed to it in the Memorandum in Support.

Dated: November 14, 2025

Respectfully submitted,

By: /s/ Jeffrey S. Gavenman
Jeffrey S. Gavenman
Jeremy W. Schulman
Schulman Bhattacharya, LLC
6116 Executive Blvd Suite 425
North Bethesda, MD 20852
Telephone: (240) 356-8553
jgavenman@schulmanbh.com
jschulman@schulmanbh.com

Edward F. Haber
Ian J. McLoughlin
Michelle H. Blauner
Patrick J. Vallely
Shapiro Haber & Urmy LLP
One Boston Place, Suite 2600
Boston, MA 02108
(617) 439-3939
ehaber@shulaw.com
imcloughlin@shulaw.com
mblauner@shulaw.com
pvallely@shulaw.com

Counsel for Plaintiffs