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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ANDREW J. KORNECKI, Individually)	No. 2:20-cv-10084-KM-JBC
and on Behalf of All Others Similarly)	
Situated,)	<u>CLASS ACTION</u>
Plaintiff,)	JOINT STATEMENT AND
vs.)	STIPULATION AND ORDER
AIRBUS SE, et al.,)	MODIFYING SETTLEMENT
Defendants.)	SCHEDULE
_____)	

Lead Plaintiff Operating Engineers Construction Industry and Miscellaneous Pension Fund (“Pension Fund,” “Plaintiff,” or “Lead Plaintiff”) and Defendants Airbus SE (“Airbus SE”), Guillaume M.J.D. Faury, Tom Enders, Dominik Asam, and Harald Wilhelm (“Defendants” and together with Lead Plaintiff, the “Parties”), by and through their undersigned counsel, agree and jointly propose this stipulation:

WHEREAS, pursuant to ¶9.14 of the Stipulation and Agreement of Settlement, and following discussions with Dutch counsel involved in an Airbus SE matter pending in The Netherlands, the Parties have modified the May 20, 2022, Stipulation and Agreement of Settlement, specifically by adding additional language to further clarify the scope of the Settlement Class and the Released Claims, specifically modifying ¶¶1.4, 1.29 and 1.32 in the Amended Stipulation and Agreement of Settlement (“Stipulation,” attached as Exhibit 1) to clarify that a Class Member’s qualifying transactions in Airbus Securities must have occurred “*in the United States*”;

WHEREAS, the Parties have applied conforming edits to the exhibits to the Stipulation; and

WHEREAS, other than the notice dates identified in ¶¶11(a), 11(b), and 14 of the Court’s May 26, 2022 Order Preliminarily Approving Settlement and Providing for Notice (“Preliminary Approval Order”), the Parties wish to maintain all dates and deadlines previously set in the Preliminary Approval Order.

IT IS HEREBY STIPULATED AND AGREED as follows:

1. The Court's Order preliminarily approving the Settlement of this Litigation (ECF 66) is reissued, in accordance with the Amended Stipulation and Agreement of Settlement dated June 7, 2022 ("Stipulation"), which, together with the Exhibits annexed thereto, sets forth the terms and conditions for a proposed Settlement of the Litigation and for dismissal of the Litigation with prejudice upon the terms and conditions set forth therein; and

2. The following dates set forth at ¶¶ 11(a), 11(b), and 14 of the Preliminary Approval Order are amended as follows, with all other dates remaining the same:

(a) Not later than seven (7) calendar days after entry by this Court of this Order ("Notice Date"), the Claims Administrator shall commence mailing the Notice and Proof of Claim, substantially in the forms annexed hereto, by First-Class Mail to all Class Members who can be identified with reasonable effort and to be posted on its website at www.AirbusSecuritiesSettlement.com;

(b) Not later than seven (7) calendar days after the Notice Date, the Claims Administrator shall cause the Summary Notice to be published once in the national edition of *The Wall Street Journal* and once over a national newswire service; and

(c) Unless the Court orders otherwise, all Proofs of Claim must be postmarked or submitted electronically no later than ninety (90) days from the Notice Date.

DATED: June 7, 2022

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s/ James E. Cecchi

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DATED: June 7, 2022

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DATED: June 7, 2022

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IT IS SO ORDERED.

DATED: June 8, 2022

/s/ Kevin McNulty

THE HONORABLE KEVIN McNULTY
UNITED STATES DISTRICT JUDGE