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Liaison Counsel for Lead Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ANDREW J. KORNECKI, Individually and on)	No. 2:20-cv-10084-KM-JBC
Behalf of All Others Similarly Situated,)
)
Plaintiff,) <u>CLASS ACTION</u>
)
vs.) DECLARATION OF ROSS D. MURRAY
) REGARDING NOTICE DISSEMINATION,
AIRBUS SE, et al.,) PUBLICATION, AND REQUESTS FOR
) EXCLUSION RECEIVED TO DATE
Defendants.)
)
_____)

I, ROSS D. MURRAY, declare and state as follows:

1. I am employed as a Vice President of Securities by Gilardi & Co. LLC (“Gilardi”), located at 1 McInnis Parkway, Suite 250, San Rafael, California. The following statements are based on my personal knowledge and information provided to me by other Gilardi employees and if called to testify I could and would do so competently.

2. Pursuant to this Court’s May 26, 2022 Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”), Gilardi was appointed as the Claims Administrator in connection with the proposed Settlement of the above-captioned litigation (the “Litigation”).¹ I oversaw the notice services that Gilardi provided in accordance with the Notice Order.

3. I submit this declaration in order to provide the Court and the parties to the Litigation with information regarding: (i) mailing of the Court-approved Notice of Pendency and Proposed Settlement of Class Action (the “Notice”) and Proof of Claim and Release form (the “Proof of Claim”) (collectively, the “Claim Package,” attached hereto as Exhibit A); (ii) publication of the Summary Notice; (iii) establishment of the website and toll-free telephone number dedicated to this Settlement; and (iv) the number of requests for exclusion from the Class received to date by Gilardi.

DISSEMINATION OF THE CLAIM PACKAGE

4. Pursuant to the Notice Order, Gilardi is responsible for disseminating the Claim Package to potential Class Members. The Class consists of all Persons who purchased or otherwise acquired Airbus Securities, traded in the United States as ADRs and foreign ordinaries under the ticker symbols “EADSY” and “EADSF” from February 24, 2016 through July 30, 2020, inclusive, and were allegedly damaged thereby. Excluded from the Class are: (i) Defendants, (ii) the current and Class Period officers and directors of the Company, (iii) members of the immediate families

¹ Any capitalized terms used that are not otherwise defined herein shall have the meanings ascribed to them in the Amended Stipulation and Agreement of Settlement dated June 7, 2022 (the “Stipulation”), which is available on the website established for the Settlement at www.AirbusSecuritiesSettlement.com.

of the Individual Defendants, and (iv) the legal representatives, heirs, successors-in-interest, or assigns of any excluded person or entity, and any entity in which such excluded persons have or had a controlling interest. Also excluded from the Class are those Persons who timely and validly request exclusion from the Class in accordance with the requirements set by the Court.

5. On June 15, 2022, as part of its normal mailing procedures, Gilardi mailed, by First-Class Mail, Claim Packages and cover letters to 281 brokerages, custodial banks, and other institutions (“Nominee Holders”) that hold securities in “street name” as nominees for the benefit of their customers who are the beneficial owners of the securities. The Nominee Holders also include a group of filers/institutions who have requested notification of every securities case. These Nominee Holders are included in a proprietary database created and maintained by Gilardi. In Gilardi’s experience, the Nominee Holders included in this proprietary database represent a significant majority of the beneficial holders of securities. The cover letter accompanying the Claim Packages advised the Nominee Holders of the proposed Settlement and requested their cooperation in forwarding the Claim Packages to potential Class Members. In the more than three decades that Gilardi has been providing notice and claims administration services in securities class actions, Gilardi has found the majority of potential class members hold their securities in street name and are notified through the Nominee Holders. Gilardi also mailed Claim Packages and cover letters to the 4,445 institutions included on the U.S. Securities and Exchange Commission’s (“SEC”) list of active brokers and dealers at the time of mailing. A sample of the cover letter mailed to Nominee Holders and the institutions included on the SEC’s list of active brokers and dealers is attached hereto as Exhibit B.

6. On June 15, 2022, Gilardi also delivered electronic copies of the Claim Package to 366 registered electronic filers who are qualified to submit electronic claims. These filers are primarily institutions and third-party filers who typically file numerous claims on behalf of beneficial owners for whom they act as trustees or fiduciaries.

7. As part of the notice program for this Settlement, on June 15, 2022, Gilardi also delivered electronic copies of the Claim Package via email to be published by the Depository Trust

Company (“DTC”) on the DTC Legal Notice System (“LENS”). LENS enables the participating bank and broker nominees to review the Claim Package and contact Gilardi for copies of the Claim Package for their beneficial holders.

8. Gilardi has acted as a repository for shareholder and nominee inquiries and communications received in this Settlement. In this regard, Gilardi has forwarded the Claim Package on request to nominees who purchased or acquired Airbus Securities for the beneficial interest of other persons. Gilardi has also forwarded the Claim Package directly to beneficial owners upon receipt of the names and addresses from such beneficial owners or nominees.

9. Following the initial mailing, Gilardi received 26 responses to the outreach efforts described above, which included computer files containing a total of 99,982 names and addresses of potential Class Members. In addition, 25 institutions requested that Gilardi send them a total of 107,390 Claim Packages for forwarding directly to their clients. Gilardi also received 18 responses that included mailing labels with names and addresses of an additional 18 potential Class Members. Gilardi has also mailed 105 Claim Packages as a result of returned mail for which new addresses were identified for re-mailing to those potential Class Members. Each of these requests has been completed in a timely manner.

10. As of August 25, 2022, Gilardi has mailed a total of 212,587 Claim Packages to potential Class Members and nominees.

PUBLICATION OF THE SUMMARY NOTICE

11. In accordance with the Notice Order, on June 22, 2022, Gilardi caused the Summary Notice to be published in *The Wall Street Journal*, and to be transmitted over *Business Wire*, as shown in the confirmations of publication attached hereto as Exhibit C.

TELEPHONE HELPLINE AND WEBSITE

12. On June 15, 2022, in conjunction with the mailing of the Notice, Gilardi established and continues to maintain a case-specific, toll-free telephone helpline, 1-888-876-0766, to accommodate potential Class Member inquiries. The toll-free number was set forth in the Notice

and on the case website. Gilardi has been and will continue to promptly respond to all inquiries to the toll-free telephone helpline.

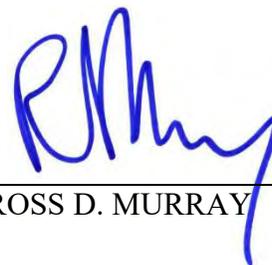
13. On June 15, 2022, Gilardi established and continues to maintain a website dedicated to this Settlement (www.AirbusSecuritiesSettlement.com) to provide additional information to Class Members and to provide answers to frequently asked questions. The web address was set forth in the Claim Package and the Summary Notice. The website includes information regarding the Litigation and the Settlement, including the objection and claim filing deadlines, and the date, time, and location of the Court's Settlement Hearing. Copies of the Notice, Proof of Claim, Stipulation, and Notice Order are posted on the website and are available for downloading. Class Members can also complete and submit a Proof of Claim through the website.

REQUESTS FOR EXCLUSION RECEIVED TO DATE

14. The Notice informs potential Class Members that written requests for exclusion from the Class must be mailed to *Airbus Securities Settlement*, c/o Gilardi & Co. LLC, EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100, such that they are postmarked no later than September 9, 2022.

15. The Notice also sets forth the information that must be included in each request for exclusion. Gilardi has monitored and will continue to monitor all mail delivered to this address. As of the date of this declaration, Gilardi has received three requests for exclusion, redacted copies of which are attached hereto as Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 25th day of August, 2022, at San Rafael, California.



ROSS D. MURRAY

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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

NOTICE OF PENDENCY AND PROPOSED SETTLEMENT OF CLASS ACTION

TO: ALL PERSONS WHO PURCHASED OR OTHERWISE ACQUIRED AIRBUS SE (“AIRBUS” OR THE “COMPANY”) SECURITIES IN THE UNITED STATES AS ADRS OR FOREIGN ORDINARIES UNDER THE TICKER SYMBOLS “EADSY” AND “EADSF” DURING THE PERIOD BETWEEN FEBRUARY 24, 2016 THROUGH AND INCLUDING JULY 30, 2020, AND WERE ALLEGEDLY DAMAGED THEREBY, AND ARE NOT OTHERWISE EXCLUDED FROM THE SETTLEMENT CLASS

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS MAY BE AFFECTED BY PROCEEDINGS IN THIS ACTION. PLEASE NOTE THAT IF YOU ARE A CLASS MEMBER, YOU MAY BE ENTITLED TO SHARE IN THE PROCEEDS OF THE SETTLEMENT DESCRIBED IN THIS NOTICE. TO CLAIM YOUR SHARE OF THE SETTLEMENT PROCEEDS, YOU MUST SUBMIT A VALID PROOF OF CLAIM AND RELEASE FORM (“PROOF OF CLAIM”) **POSTMARKED OR SUBMITTED ONLINE ON OR BEFORE SEPTEMBER 13, 2022.**

This Notice of Pendency and Proposed Settlement of Class Action (“Notice”) has been sent to you pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of New Jersey (the “Court”). The purpose of this Notice is to inform you of the pendency of this class action (the “Litigation”) between Lead Plaintiff Operating Engineers Construction Industry and Miscellaneous Pension Fund and defendants Airbus, Guillaume M.J.D. Fauray, Tom Enders, Dominik Asam, and Harald Wilhelm (“Defendants”) and the proposed \$5,000,000 settlement reached therein (the “Settlement”), and of the hearing to be held by the Court to consider the fairness, reasonableness, and adequacy of the Settlement as well as counsel’s application for fees and expenses. This Notice describes what steps you may take in relation to the Settlement and this class action.¹

This Notice is not intended to be, and should not be construed as, an expression of any opinion by the Court with respect to the truth of the allegations in the Litigation as to any of the Defendants or the merits of the claims or defenses asserted by or against the Defendants. This Notice is solely to advise you of the proposed Settlement of the Litigation and of your rights in connection therewith.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
SUBMIT A CLAIM FORM	The only way to be eligible to receive a payment from the Settlement. Proofs of Claim must be postmarked or submitted online on or before September 13, 2022.
EXCLUDE YOURSELF	Get no payment. This is the only option that <i>potentially</i> allows you to ever be part of any other lawsuit against the Defendants or any other Released Parties about the legal claims being resolved by this Settlement. Exclusions must be postmarked on or before September 9, 2022.
OBJECT	Write to the Court about why you do not like the Settlement, the Plan of Allocation, and/or the request for attorneys’ fees and expenses. You will still be a Member of the Class. Objections must be received by the Court and counsel on or before September 9, 2022.
GO TO THE HEARING ON SEPTEMBER 30, 2022	Ask to speak in Court about the fairness of the Settlement. Requests to speak must be received by the Court and counsel on or before September 9, 2022.
DO NOTHING	Receive no payment. You will, however, still be a Member of the Class, which means that you give up your right to ever be part of any other lawsuit against the Defendants or any other Released Parties about the legal claims being resolved by this Settlement and you will be bound by any judgments or orders entered by the Court in the Litigation.

¹ All capitalized terms used in this Notice that are not otherwise defined herein shall have the meanings provided in the Amended Stipulation and Agreement of Settlement dated June 7, 2022 (the “Settlement Agreement” or “Stipulation”), which is available on the website www.AirbusSecuritiesSettlement.com.

SUMMARY OF THIS NOTICE

Statement of Settlement Class Recovery

Pursuant to the Settlement described herein, a \$5 million Settlement Fund has been established. Based on Lead Plaintiff's estimate of the number of shares of Airbus Securities damaged during the Class Period, the average distribution per share under the Plan of Allocation is approximately \$0.40 for each foreign ordinary shares ("EADSF") and \$0.11 for each ADR ("EADSY") before deduction of any taxes on the income earned on the Settlement Amount thereof, notice and administration costs, and the attorneys' fees and expenses as determined by the Court. **Class Members should note, however, that these are only estimates.** A Class Member's actual recovery will be a proportion of the Net Settlement Fund determined by that claimant's claims as compared to the total claims of all Class Members who submit acceptable Proofs of Claim. An individual Class Member may receive more or less than this estimated average amount. See Plan of Allocation set forth and discussed at pages 8-11 below for more information on the calculation of your claim.

Statement of Potential Outcome of Case

The Settling Parties disagree on both liability and damages and do not agree on the amount of damages that would be recoverable if the Settlement Class prevailed on each claim alleged. Defendants deny that they are liable to the Settlement Class and deny that the Settlement Class has suffered any damages. The issues on which the Parties disagree are many, but include: (1) whether Defendants engaged in conduct that would give rise to any liability to the Settlement Class under the federal securities laws, or any other laws; (2) whether Defendants have valid defenses to any such claims of liability; (3) the appropriate economic model for determining the amount by which the price of Airbus Securities was allegedly artificially inflated (if at all) during the Class Period; (4) the amount, if any, by which the price of Airbus Securities was allegedly artificially inflated (if at all) during the Class Period; (5) the effect of various market forces on the price of Airbus Securities at various times during the Class Period; (6) the extent to which external factors influenced the price of Airbus Securities at various times during the Class Period; (7) the extent to which the various matters that Lead Plaintiff alleged were materially false or misleading influenced (if at all) the price of Airbus Securities at various times during the Class Period; and (8) the extent to which the various allegedly adverse material facts that Lead Plaintiff alleged were omitted influenced (if at all) the price of Airbus Securities at various times during the Class Period.

Statement of Attorneys' Fees and Expenses Sought

Since the action's inception, Lead Counsel has expended considerable time and effort in the prosecution of this Litigation on a wholly contingent basis and has advanced the expenses of the Litigation in the expectation that if it was successful in obtaining a recovery for the Settlement Class it would be paid from such recovery. Lead Counsel will apply to the Court for an award of attorneys' fees not to exceed thirty percent (30%) of the Settlement Amount, plus expenses not to exceed \$200,000, plus interest earned on both amounts at the same rate as earned by the Settlement Fund. If the amounts requested are approved by the Court, the average cost per share is approximately \$0.13 for each foreign ordinary share ("EADSF") and \$0.04 for each ADR ("EADSY"). In addition, Lead Plaintiff may seek payment for its time and expenses incurred in representing the Settlement Class.

Further Information

For further information regarding the Litigation, this Notice or to review the Settlement Agreement, please contact the Claims Administrator toll-free at 1-888-876-0766, or visit the website www.AirbusSecuritiesSettlement.com.

You may also contact a representative of counsel for the Settlement Class: Shareholder Relations Department, Robbins Geller Rudman & Dowd LLP, 655 West Broadway, Suite 1900, San Diego, CA 92101, 1-800-449-4900, settlementinfo@rgrdlaw.com.

Please Do Not Call the Court or Defendants with Questions About the Settlement.

Reasons for the Settlement

Lead Plaintiff's principal reason for entering into the Settlement is the benefit to the Settlement Class now, without further risk or the delays inherent in continued litigation. The cash benefit under the Settlement must be considered against the significant risk that a smaller recovery—or, indeed, no recovery at all—might be achieved after contested motions, trial, and likely appeals, a process that could last several years into the future. For the Defendants, who have denied and continue to deny all allegations of liability, fault, or wrongdoing whatsoever, the principal reason for entering into the Settlement is to eliminate the uncertainty, risk, costs, and burdens inherent in any litigation, especially in complex cases such as this Litigation. Defendants have concluded that further conduct of this Litigation could be protracted and distracting.

BASIC INFORMATION

1. Why did I get this Notice package?

This Notice was sent to you pursuant to an Order of a U.S. Federal Court because you or someone in your family or an investment account for which you serve as custodian may have purchased or otherwise acquired Airbus Securities during the period from February 24, 2016 through and including July 30, 2020 (“Settlement Class Period”).

This Notice explains the class action lawsuit, the Settlement, Class Members’ legal rights in connection with the Settlement, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the Litigation is the United States District Court for the District of New Jersey, and the case is known as *Kornecki v. Airbus SE, et al.*, Case No. 2:20-cv-10084-KM-JBC (D.N.J.). The case has been assigned to the Honorable Kevin McNulty. The entity representing the Settlement Class is the “Lead Plaintiff,” and the company and individuals it sued and who have now settled are called the Defendants.

2. What is this lawsuit about?

On August 6, 2020, a putative class action was filed in the United States District Court for the District of New Jersey alleging violations of federal securities laws. The Court has appointed the law firm of Robbins Geller Rudman & Dowd LLP as Lead Counsel. Operating Engineers Construction Industry and Miscellaneous Pension Fund is the Court-appointed Lead Plaintiff.

The Class Action Complaint (the “Complaint”) filed in the Litigation alleged violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934. The Complaint asserted that Defendants made material misstatements and omissions regarding, among other things: (i) the sufficiency of Airbus’s policies and protocols to ensure compliance with relevant anti-corruption laws and regulations; (ii) Airbus’s involvement in a bribery and corruption scheme to enhance its commercial aircraft, helicopter, and defense business; (iii) Airbus’s earnings derived in part from alleged unlawful conduct and the sustainability of such earnings; and (iv) whether and to what extent the resolution of government investigations and enforcement actions would foreseeably cost Airbus substantial settlements and legal fees and subject the Company to significant continuing government oversight.

Defendants deny each and all of the claims and contentions of wrongdoing alleged by Lead Plaintiff in the Litigation. Defendants contend that they did not make any materially false or misleading statements, that they disclosed all material information required to be disclosed by the federal securities laws, and that any alleged misstatements or omissions were not made with the requisite intent or knowledge of wrongdoing. Defendants also contend that any losses allegedly suffered by Members of the Class were not caused by any allegedly false or misleading statements by them and/or were caused by intervening events. Defendants also maintain that they have meritorious defenses to all claims that were raised or could have been raised in the Litigation.

3. Why is there a settlement?

The Court has not decided in favor of Defendants or of the Lead Plaintiff. Instead, both sides agreed to the Settlement to avoid the distraction, costs, and risks of further litigation, and Lead Plaintiff agreed to the Settlement in order to ensure that Class Members will receive compensation.

WHO IS IN THE SETTLEMENT

4. How do I know if I am a Member of the Class?

The Court directed that everyone who fits this description is a Settlement Class Member: ***all Persons who purchased or otherwise acquired Airbus Securities in the United States as ADRs and foreign ordinaries under the ticker symbols “EADSY” and “EADSF” during the period between February 24, 2016 through and including July 30, 2020, and were allegedly damaged thereby, except those Persons and entities that are excluded.***

Excluded from the Settlement Class are: (i) Defendants, (ii) the current and Class Period officers and directors of the Company, (iii) members of the immediate families of the Individual Defendants, and (iv) the legal representatives, heirs, successors-in-interest, or assigns of any excluded person or entity, and any entity in which such excluded persons have or had a controlling interest. Also excluded from the Settlement Class are those Persons who timely and validly exclude themselves therefrom by submitting a request for exclusion in accordance with the requirements set forth in question 11 below.

Please Note: Receipt of this Notice does not mean that you are a Class Member or that you will be entitled to receive a payment from the Settlement. If you are a Class Member and you wish to be eligible to participate in the distribution of proceeds from the Settlement, you are required to submit the Proof of Claim that is being distributed with this Notice and the required supporting documentation as set forth therein postmarked or submitted online on or before September 13, 2022.

5. What if I am still not sure if I am included?

If you are still not sure whether you are included, you can ask for free help. You can contact the Claims Administrator toll-free at 1-888-876-0766, or you can fill out and return the Proof of Claim enclosed with this Notice package, to see if you qualify.

THE SETTLEMENT BENEFITS – WHAT YOU GET**6. What does the Settlement provide?**

The Settlement provides that, in exchange for the release of the Released Claims (defined below) and dismissal of the Litigation, Airbus has agreed to pay (or cause to be paid) \$5 million in cash to be distributed after taxes, tax expenses, notice and claims administration expenses, and approved fees and expenses, *pro rata*, to Class Members who send in a valid Proof of Claim pursuant to the Court-approved Plan of Allocation. The Plan of Allocation is described in more detail at the end of this Notice.

7. How much will my payment be?

Your share of the Net Settlement Fund will depend on several things, including the total amount of claims represented by the valid Proofs of Claim that Class Members send in, compared to the amount of your claim, all as calculated under the Plan of Allocation discussed below.

HOW YOU GET A PAYMENT – SUBMITTING A PROOF OF CLAIM**8. How can I get a payment?**

To be eligible to receive a payment from the Settlement, you must submit a Proof of Claim. A Proof of Claim is enclosed with this Notice or it may be downloaded at www.AirbusSecuritiesSettlement.com. Read the instructions carefully, fill out the Proof of Claim, include all the documents the form asks for, sign it, and **mail or submit it online so that it is postmarked or received no later than September 13, 2022**. The Proof of Claim may be submitted online at www.AirbusSecuritiesSettlement.com.

9. When would I get my payment?

The Court will hold a Settlement Hearing on September 30, 2022, at 2:00 p.m., to decide whether to approve the Settlement. If the Court approves the Settlement, there might be appeals. It is always uncertain whether appeals can be resolved, and if so, how long it would take to resolve them. It also takes time for all the Proofs of Claim to be processed. Please be patient.

10. What am I giving up to get a payment or to stay in the Settlement Class?

Unless you timely and validly exclude yourself, you are staying in the Settlement Class, and that means you cannot sue, continue to sue, or be part of any other lawsuit against Defendants or their Related Parties about the Released Claims (as defined below) in this case. It also means that all of the Court's orders will apply to you and legally bind you. If you remain a Class Member, and if the Settlement is approved, you will give up all "Released Claims" (as defined below), including "Unknown Claims" (as defined below), against the "Released Parties" (as defined below):

- "Released Claims" means all claims, rights, liabilities, and causes of action of every nature and description, including both known claims and Unknown Claims (as defined below), rights, demands, liabilities or causes of action of every nature and description whatsoever (including, but not limited to, any claims for damages, interest, attorneys' fees, expert or consulting fees, and any other costs, expenses, or liabilities whatsoever), to the fullest extent that the law permits their release in this Litigation, by or on behalf of Lead Plaintiff or any other Class Members against any of the Released Parties that have been alleged or could have been alleged in this Litigation (or in any forum or proceeding or otherwise), whether based on federal, state, local, statutory, or common or foreign law, or any other law, rule, or regulation, whether known claims or Unknown Claims, whether class, representative, or individual in nature, whether fixed or contingent, accrued or unaccrued, liquidated or unliquidated, whether at law or in equity, matured or unmatured, that are based on, relate to, or arise out of both (i) the allegations, transactions, facts, matters, events, disclosures, statements, occurrences, circumstances, representations, conduct, acts, or omissions or failures to act that have been or could have been alleged or asserted in the Litigation, and (ii) Lead Plaintiff's or any other Class Member's purchase of Airbus Securities in the United States during the Class Period. Notwithstanding the foregoing, "Released Claims" does not include claims relating to the enforcement of the Settlement.
- "Released Defendants' Claims" means all claims and causes of action of every nature and description, including both known claims and Unknown Claims (as defined below), whether arising under federal, state, common or foreign law, or any other law, that Defendants could have asserted against any of the Released Plaintiff Parties, including Plaintiff's Counsel and Class Members, that arise out of or relate in any way to

the institution, prosecution, or settlement of the claims in the Litigation, except for claims relating to the enforcement of the Settlement. “Released Parties” means each and all of the Defendants, and each and all of their respective Related Parties.

- “Related Parties” means each of a Defendant’s past or present directors, officers, employees, partners, insurers, co-insurers, reinsurers, principals, controlling shareholders, members, agents, administrators, attorneys, accountants, auditors, bankers, underwriters, investment advisors, personal or legal representatives, predecessors, successors, direct and/or indirect parents, subsidiaries, divisions, joint ventures, partnerships, limited liability companies, affiliates, assigns, spouses, heirs, estates, related or affiliated entities, any entity in which a Defendant has a controlling interest, any member of a Defendant’s immediate family, any trust of which a Defendant is the settlor or which is for the benefit of a Defendant and/or any member of a Defendant’s immediate family, and any entity in which a Defendant and/or any member of a Defendant’s immediate family has or had a controlling interest (directly or indirectly).
- “Unknown Claims” means collectively any Released Claims that Lead Plaintiff or any other Class Members does not know or suspect to exist in his, her or its favor at the time of the release of the Released Parties which, if known by him, her or it, might have affected such Class Member’s settlement or decisions with respect to the Settlement, including, but not limited to, the release of the Released Parties or the decision not to object to or opt out of this Settlement. “Unknown Claims” also means any Released Defendants’ Claims that Defendants do not know or suspect to exist in their favor at the time of the release of the Released Plaintiff Parties, including Plaintiff’s Counsel and Class Members, which if known by them, might have affected their settlement or decisions with respect to the Settlement, including, but not limited to, the release of the Released Plaintiff Parties. Unknown Claims include, without limitation, those claims in which some or all of the facts composing the claim may be unsuspected, undisclosed, concealed, or hidden. With respect to any and all Released Claims and Released Defendants’ Claims, the Released Parties stipulate and agree that, upon the Effective Date, Lead Plaintiff and Class Members (as regards the Released Claims) and the Defendants (as regards the Released Defendants’ Claims) shall expressly waive and relinquish, and each Class Member shall be deemed to have and by operation of law and of the Judgment shall have, expressly waived and relinquished, to the fullest extent permitted by law, any and all provisions, rights and benefits conferred by California Civil Code §1542, or any law of any state or territory of the United States, or principle of common law or of international or foreign law, which is similar, comparable, or equivalent to Cal. Civ. Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

Lead Plaintiff and Class Members may hereafter discover facts in addition to or different from those which he, she or it now knows or believes to be true with respect to the subject matter of the Released Claims, but Lead Plaintiff shall expressly fully, finally, and forever settle and release, and each Class Member, upon the Effective Date, shall be deemed to have, and by operation of the Judgment shall have, fully, finally, and forever settled and released, any and all Released Claims, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or existence of such different or additional facts. Lead Plaintiff and Defendants acknowledge, and Class Members shall be deemed by operation of law (including by operation of the Judgment) to have acknowledged, that the foregoing waiver was separately bargained for and is a key element of the Settlement.

EXCLUDING YOURSELF FROM THE SETTLEMENT CLASS

If you do not want to participate in this Settlement, and you want to keep the right to potentially sue the Defendants and the other Released Parties, on your own, about the claims being released by the Settlement, then you must take steps to remove yourself from the Settlement. This is called excluding yourself—or is sometimes referred to as “opting out.” If you are requesting exclusion because you want to bring your own lawsuit based on the matters alleged in this Litigation, you may want to consult an attorney and discuss whether any individual claim that you may wish to pursue would be time-barred by the applicable statutes of limitation or repose.

11. How do I get out of the Settlement Class and the proposed Settlement?

To exclude yourself from the Settlement Class and the Settlement, you must send a letter by First-Class Mail stating that you “request exclusion from the Settlement Class in the *Airbus Securities Settlement*.” Your letter must include your purchases or acquisitions of Airbus Securities during the Class Period, including the dates, the number of Airbus Securities purchased or acquired, and price paid for each such purchase or acquisition. In addition, you must include your name, address, telephone number, and your signature. You must submit your exclusion request so that it is **postmarked no later than September 9, 2022** to:

Airbus Securities Settlement
c/o Gilardi & Co. LLC
EXCLUSIONS
P.O. Box 5100
Larkspur CA 94977-5100

If you ask to be excluded, you will not get any payment from the Settlement, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit, and you may be able to sue the Defendants and the other Released Parties about the Released Claims in the future.

12. If I do not exclude myself, can I sue the Defendants and the other Released Parties for the same thing later?

No. Unless you exclude yourself, you give up any rights you may potentially have to sue the Defendants and the other Released Parties for any and all Released Claims. If you have a pending lawsuit against the Released Parties, speak to your lawyer in that case immediately. You must exclude yourself from the Settlement Class in this Litigation to continue your own lawsuit. Remember, the exclusion deadline is September 9, 2022.

13. If I exclude myself, can I get money from the proposed Settlement?

No. If you exclude yourself, you should not send in a Proof of Claim to ask for any money. But you may have the right to potentially sue or be part of a different lawsuit against the Defendants and the other Released Parties.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

The Court ordered that the law firm of Robbins Geller Rudman & Dowd LLP represents the Class Members, including you. These lawyers are called Lead Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

Lead Counsel will apply to the Court for an award of attorneys' fees not to exceed thirty percent (30%) of the Settlement Amount and for expenses in an amount not to exceed \$200,000 in connection with the Litigation, plus interest on such fees and expenses at the same rate as earned by the Settlement Fund. In addition, Lead Plaintiff may seek up to \$2,500 for its time and expenses incurred in representing the Settlement Class. Such sums as may be approved by the Court will be paid from the Settlement Fund.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or any part of it.

16. How do I tell the Court that I object to the proposed Settlement?

If you are a Class Member, you can comment or object to the proposed Settlement, the proposed Plan of Allocation and/or Lead Counsel's fee and expense application. You can write to the Court setting out your comment or objection. The Court will consider your views. To comment or object, you must send a signed letter saying that you wish to comment on or object to the proposed Settlement in the *Airbus Securities Settlement*. Include your name, address, telephone number, and your signature, identify the date(s), price(s), and number of Airbus Securities you purchased, acquired, and sold during the Class Period, and state with specificity your comments or the reasons why you object to the proposed Settlement, Plan of Allocation and/or fee and expense application, including any legal support for such objection. Any objection must state whether it applies only to the objector, to a specific subset of the Settlement Class, or to the entire Settlement Class. You must also include copies of documents demonstrating such purchase(s), acquisition(s), and/or sale(s). Your comments or objection must be filed with the Court and mailed or delivered to each of the following addresses such that it is **received no later than September 9, 2022**:

COURT

CLERK OF THE COURT
UNITED STATES DISTRICT
COURT
DISTRICT OF NEW JERSEY
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07102

LEAD COUNSEL

Brian O. O'Mara
ROBBINS GELLER
RUDMAN & DOWD LLP
655 West Broadway
Suite 1900
San Diego, CA 92101

DEFENDANTS' COUNSEL

D. Scott Carlton
PAUL HASTINGS LLP
515 S. Flower Street
25th Floor
Los Angeles, CA 90071

17. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you do not like something about the Settlement. You can object **only** if you stay in the Settlement Class.

Excluding yourself is telling the Court that you do not want to be paid and do not want to release any claims you think you may have against Defendants and their Related Parties. If you exclude yourself, you cannot object to the Settlement because it does not affect you.

THE COURT'S SETTLEMENT HEARING

The Court will hold a hearing to decide whether to approve the proposed Settlement. You may attend and you may ask to speak, but you do not have to.

18. When and where will the Court decide whether to approve the proposed Settlement?

The Court will hold a Settlement Hearing at **2:00 p.m., on September 30, 2022**, in the Courtroom of the Honorable Kevin McNulty, at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102. At the hearing the Court will consider whether the Settlement and the Plan of Allocation are fair, reasonable, and adequate. If there are objections, the Court will consider them, even if you do not ask to speak at the hearing. The Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay to Lead Counsel and Lead Plaintiff. After the Settlement Hearing, the Court will decide whether to approve the Settlement and the Plan of Allocation. We do not know how long these decisions will take. You should be aware that the Court may change the date and time of the Settlement Hearing without another notice being sent to Class Members. If you want to attend the hearing, you should check with Lead Counsel or the Settlement website www.AirbusSecuritiesSettlement.com beforehand to be sure that the date and/or time has not changed.

19. Do I have to come to the hearing?

No. Lead Counsel will answer questions the Court may have. But, you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary. Class Members do not need to appear at the hearing or take any other action to indicate their approval.

20. May I speak at the hearing?

If you object to the Settlement, the Plan of Allocation, and/or the fee and expense application, you may ask the Court for permission to speak at the Settlement Hearing. To do so, you must include with your objection (see question 16 above) a statement saying that it is your “Notice of Intention to Appear in the *Airbus Securities Settlement*.” Persons who intend to object to the Settlement, the Plan of Allocation, and/or any attorneys’ fees and expenses to be awarded to Lead Counsel or Lead Plaintiff and desire to present evidence at the Settlement Hearing must include in their written objections the identity of any witnesses they may call to testify and exhibits they intend to introduce into evidence at the Settlement Hearing. Your notice of intention to appear must be **received no later than September 9, 2022**, and addressed to the Clerk of the Court, Plaintiff’s Counsel, and Defendants’ Counsel, at the addresses listed above in question 16.

You cannot speak at the hearing if you exclude yourself from the Settlement Class.

IF YOU DO NOTHING

21. What happens if I do nothing?

If you do nothing, you will not receive any money from this Settlement. In addition, unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants and their Related Parties about the Released Claims in this case.

GETTING MORE INFORMATION

22. How do I get more information?

For even more detailed information concerning the matters involved in this Litigation, you can obtain answers to common questions regarding the proposed Settlement by contacting the Claims Administrator toll-free at 1-888-876-0766. Reference is also made to the Settlement Agreement, to the pleadings in support of the Settlement, to the Orders entered by the Court and to the other Settlement-related papers filed in the Litigation, which are posted on the Settlement website at www.AirbusSecuritiesSettlement.com, and which may be inspected at the Office of the Clerk of the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Room 4015, Newark, NJ 07102, during regular business hours. For a fee, all papers filed in this Litigation are available at www.pacer.gov.

PLAN OF ALLOCATION OF NET SETTLEMENT FUND AMONG CLASS MEMBERS

The Settlement Amount of \$5 million and any interest earned thereon is the “Settlement Fund.” The Settlement Fund, less all taxes, tax expenses, notice and claims administration expenses, and approved fees and expenses (the “Net Settlement Fund”) shall be distributed to Class Members who submit timely and valid Proofs of Claim to the Claims Administrator (“Authorized Claimants”). The Plan of Allocation provides that you will be eligible to participate in the distribution of the Net Settlement Fund only if you have an overall net loss on all of your transactions in Airbus Securities during the Class Period.

For purposes of formulating the Plan of Allocation and determining the amount an Authorized Claimant may recover under it, Lead Counsel has conferred with its damages consultant regarding the Plan of Allocation and it reflects an assessment of the damages that it believes could have been recovered by Class Members had Lead Plaintiff prevailed at trial.

In the unlikely event there are sufficient funds in the Net Settlement Fund, each Authorized Claimant will receive an amount equal to the Authorized Claimant’s Recognized Loss, as defined below. If, however, and as is more likely, the amount in the Net Settlement Fund is not sufficient to permit payment of the total Recognized Loss of each Authorized Claimant, then each Authorized Claimant shall be paid the percentage of the Net Settlement Fund that each Authorized Claimant’s Recognized Loss bears to the total of the claims of all Authorized Claimants. Payment in this manner shall be deemed conclusive against all Authorized Claimants.

The calculation of claims below is not an estimate of the amount you will receive. It is a formula for allocating the Net Settlement Fund among all Authorized Claimants. Furthermore, if any of the formulas set forth below yield an amount less than \$0.00, the Recognized Loss per share shall be \$0.00.

A Recognized Loss, or “claim,” will be calculated as follows:

1. **For shares of Airbus ADRs (“EADSY”)** purchased or acquired in the United States from February 24, 2016, through July 30, 2020, inclusive, the claim per share shall be as follows:
 - (a) If sold from February 24, 2016 through July 30, 2020, inclusive, the Recognized Loss per share shall be the lesser of:
 - (i) the inflation per share in Table A at the time of purchase less the inflation per share in Table A at the time of sale; or
 - (ii) the difference between the purchase price per share and the sales price per share.
 - (b) If sold from July 31, 2020 through October 28, 2020, inclusive, the Recognized Loss per share shall be the least of:
 - (i) the inflation per share in Table A at the time of purchase;
 - (ii) the difference between the purchase price per share and the sales price per share; or
 - (iii) the difference between the purchase price per share and the average closing price per share up to the date of sale as set forth in Table B below.
 - (c) If retained at the close of trading on October 28, 2020, the Recognized Loss per share shall be the lesser of:
 - (i) the inflation per share in Table A at the time of purchase; or
 - (ii) the difference between the purchase price per share and \$19.82 per share (the 90-day average Airbus ADR closing price following the final corrective disclosure).
2. **For shares of Airbus foreign ordinary shares (“EADSF”)** purchased or acquired in the United States from February 24, 2016 through July 30, 2020, inclusive, and:
 - (a) If sold from February 24, 2016 through July 30, 2020, inclusive, the Recognized Loss per share shall be the lesser of:
 - (i) the inflation per share in Table C at the time of purchase less the inflation per share in Table C at the time of sale; or
 - (ii) the difference between the purchase price per share and the sales price per share.
 - (b) Sold from July 31, 2020 through October 28, 2020, inclusive, the Recognized Loss per share shall be the least of:
 - (i) the inflation per share in Table C at the time of purchase;
 - (ii) the difference between the purchase price per share and the sales price per share; or
 - (iii) the difference between the purchase price per share and the average closing price per share up to the date of sale as set forth in Table D below.
 - (c) If retained at the close of trading on October 28, 2020, the Recognized Loss per share shall be the lesser of:
 - (i) the inflation per share in Table C at the time of purchase; or
 - (ii) the difference between the purchase price per share and \$79.35 per share (the 90-day average Airbus ordinary shares closing price following the final corrective disclosure).

TABLE A:

Transaction Period	Inflation
February 24, 2016 through January 26, 2020	\$1.35
January 27, 2020 through March 15, 2020	\$0.59
March 16, 2020 through July 30, 2020	\$0.42

TABLE B:

Date	Closing Price	Average Closing Price from July 31, 2020 Through Sale Date
7/31/2020	\$18.13	\$18.13
8/3/2020	\$18.63	\$18.38
8/4/2020	\$19.29	\$18.68
8/5/2020	\$20.13	\$19.05
8/6/2020	\$20.35	\$19.31
8/7/2020	\$20.33	\$19.48
8/10/2020	\$21.08	\$19.71
8/11/2020	\$21.80	\$19.97
8/12/2020	\$21.83	\$20.17
8/13/2020	\$21.45	\$20.30
8/14/2020	\$21.13	\$20.38
8/17/2020	\$21.07	\$20.44
8/18/2020	\$20.57	\$20.45
8/19/2020	\$20.59	\$20.46
8/20/2020	\$20.45	\$20.46
8/21/2020	\$20.25	\$20.44
8/24/2020	\$21.09	\$20.48
8/25/2020	\$21.18	\$20.52
8/26/2020	\$20.82	\$20.54
8/27/2020	\$21.13	\$20.56
8/28/2020	\$21.23	\$20.60
8/31/2020	\$20.59	\$20.60
9/1/2020	\$20.56	\$20.59
9/2/2020	\$21.51	\$20.63
9/3/2020	\$20.91	\$20.64
9/4/2020	\$20.92	\$20.65
9/8/2020	\$20.70	\$20.66
9/9/2020	\$20.46	\$20.65
9/10/2020	\$20.28	\$20.64
9/11/2020	\$20.33	\$20.63
9/14/2020	\$20.93	\$20.64
9/15/2020	\$20.50	\$20.63

Date	Closing Price	Average Closing Price from July 31, 2020 Through Sale Date
9/16/2020	\$20.65	\$20.63
9/17/2020	\$21.00	\$20.64
9/18/2020	\$20.21	\$20.63
9/21/2020	\$18.91	\$20.58
9/22/2020	\$18.45	\$20.53
9/23/2020	\$17.78	\$20.45
9/24/2020	\$17.45	\$20.38
9/25/2020	\$17.54	\$20.31
9/28/2020	\$18.06	\$20.25
9/29/2020	\$18.28	\$20.20
9/30/2020	\$18.13	\$20.16
10/1/2020	\$18.96	\$20.13
10/2/2020	\$18.92	\$20.10
10/5/2020	\$19.36	\$20.09
10/6/2020	\$19.54	\$20.07
10/7/2020	\$19.62	\$20.06
10/8/2020	\$19.66	\$20.06
10/9/2020	\$19.61	\$20.05
10/12/2020	\$19.50	\$20.04
10/13/2020	\$18.61	\$20.01
10/14/2020	\$18.06	\$19.97
10/15/2020	\$18.23	\$19.94
10/16/2020	\$18.68	\$19.92
10/19/2020	\$19.10	\$19.90
10/20/2020	\$19.80	\$19.90
10/21/2020	\$18.89	\$19.88
10/22/2020	\$19.31	\$19.87
10/23/2020	\$20.08	\$19.88
10/26/2020	\$19.35	\$19.87
10/27/2020	\$18.64	\$19.85
10/28/2020	\$17.88	\$19.82

TABLE C:

Transaction Period	Inflation
February 24, 2016 through January 26, 2020	\$5.40
January 27, 2020 through March 15, 2020	\$2.36
March 16, 2020 through July 30, 2020	\$1.68

TABLE D:

Date	Closing Price	Average Closing Price from July 31, 2020 Through Sale Date
7/31/2020	\$72.10	\$72.10
8/3/2020	\$75.00	\$73.55
8/4/2020	\$76.49	\$74.53
8/5/2020	\$80.33	\$75.98
8/6/2020	\$81.53	\$77.09
8/7/2020	\$82.08	\$77.92
8/10/2020	\$84.15	\$78.81
8/11/2020	\$87.90	\$79.95
8/12/2020	\$87.21	\$80.75
8/13/2020	\$85.90	\$81.27
8/14/2020	\$85.00	\$81.61
8/17/2020	\$84.15	\$81.82
8/18/2020	\$82.50	\$81.87
8/19/2020	\$83.33	\$81.98
8/20/2020	\$83.57	\$82.08
8/21/2020	\$80.70	\$82.00
8/24/2020	\$84.32	\$82.13
8/25/2020	\$85.70	\$82.33
8/26/2020	\$82.55	\$82.34
8/27/2020	\$84.10	\$82.43
8/28/2020	\$84.22	\$82.52
8/31/2020	\$82.92	\$82.53
9/1/2020	\$81.90	\$82.51
9/2/2020	\$85.11	\$82.61
9/3/2020	\$83.58	\$82.65
9/4/2020	\$82.03	\$82.63
9/8/2020	\$83.15	\$82.65
9/9/2020	\$81.10	\$82.59
9/10/2020	\$81.59	\$82.56
9/11/2020	\$80.25	\$82.48
9/14/2020	\$83.44	\$82.51
9/15/2020	\$81.42	\$82.48

Date	Closing Price	Average Closing Price from July 31, 2020 Through Sale Date
9/16/2020	\$84.66	\$82.54
9/17/2020	\$83.20	\$82.56
9/18/2020	\$82.08	\$82.55
9/21/2020	\$76.00	\$82.37
9/22/2020	\$73.91	\$82.14
9/23/2020	\$70.30	\$81.83
9/24/2020	\$69.31	\$81.51
9/25/2020	\$70.04	\$81.22
9/28/2020	\$73.01	\$81.02
9/29/2020	\$72.47	\$80.82
9/30/2020	\$71.84	\$80.61
10/1/2020	\$75.24	\$80.49
10/2/2020	\$75.09	\$80.37
10/5/2020	\$78.12	\$80.32
10/6/2020	\$78.01	\$80.27
10/7/2020	\$79.23	\$80.25
10/8/2020	\$79.06	\$80.22
10/9/2020	\$79.44	\$80.21
10/12/2020	\$77.25	\$80.15
10/13/2020	\$74.01	\$80.03
10/14/2020	\$73.00	\$79.90
10/15/2020	\$72.87	\$79.77
10/16/2020	\$75.00	\$79.68
10/19/2020	\$77.00	\$79.63
10/20/2020	\$80.35	\$79.65
10/21/2020	\$76.77	\$79.60
10/22/2020	\$77.35	\$79.56
10/23/2020	\$80.00	\$79.57
10/26/2020	\$76.98	\$79.52
10/27/2020	\$76.25	\$79.47
10/28/2020	\$71.78	\$79.35

The date of purchase or sale is the “contract” or “trade” date as distinguished from the “settlement” date.

For Class Members who held Airbus Securities at the beginning of the Class Period or made multiple purchases, acquisitions, or sales during the Class Period, the First-In, First-Out (“FIFO”) method will be applied to such holdings, purchases, acquisitions, and sales for purposes of calculating a claim. Under the FIFO method, sales of Airbus Securities during the Class Period will be matched, in chronological order, first against shares of Airbus Securities held at the beginning of the Class Period. The remaining Airbus Securities sales during the Class Period will then be matched, in chronological order, against Airbus Securities purchased or acquired during the Class Period.

A Class Member will be eligible to receive a distribution from the Net Settlement Fund only if a Class Member had a net overall loss, after all profits from transactions in all Airbus Securities described above during the Class Period are subtracted from all losses. However, the proceeds from Airbus Securities sales that have been matched against the Airbus Securities held at the beginning of the Class Period will not be used in the calculation of such net loss. No distributions will be made to Authorized Claimants who would otherwise receive a distribution of less than \$10.00.

The Court has reserved jurisdiction to allow, disallow, or adjust the claim of any Class Member on equitable grounds.

Payment pursuant to the Plan of Allocation set forth above shall be conclusive against all Authorized Claimants. Defendants, their respective counsel, and all other Released Parties will have no responsibility or liability whatsoever for the investment of the Settlement Fund, the distribution of the Net Settlement Fund, the Plan of Allocation, or the payment of any claim. No Person shall have any claim against Lead Plaintiff, Lead Plaintiff's Counsel, the Claims Administrator, or other Person designated by Lead Counsel, Defendants, or Defendants' Counsel based on distributions made substantially in accordance with the Stipulation and the Settlement contained therein, the Plan of Allocation, or further orders of the Court. All Class Members who fail to complete and submit a valid and timely Proof of Claim shall be barred from participating in distributions from the Net Settlement Fund (unless otherwise ordered by the Court), but otherwise shall be bound by all of the terms of the Stipulation, including the terms of any judgment entered and the releases given.

SPECIAL NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

If you purchased or acquired Airbus Securities during the Class Period for the beneficial interest of an individual or organization other than yourself, the Court has directed that, WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS NOTICE, you either (a) provide to the Claims Administrator the name and last known address of each person or organization for whom or which you purchased or acquired such securities during such time period, or (b) request additional copies of this Notice and the Proof of Claim, which will be provided to you free of charge, and within ten (10) days mail the Notice and Proof of Claim via First Class mail directly to the beneficial owners of the securities referred to herein. If you choose to follow alternative procedure (b), upon such mailing, you must send a statement to the Claims Administrator confirming that the mailing was made as directed and retain the names and addresses for any future mailings to Class Members. You are entitled to reimbursement from the Settlement Fund of your reasonable expenses actually incurred in connection with the foregoing, including reimbursement of postage expense and the cost of ascertaining the names and addresses of beneficial owners. Your reasonable expenses will be paid upon request and submission of appropriate supporting documentation. All communications concerning the foregoing should be addressed to the Claims Administrator at notifications@gilardi.com or:

Airbus Securities Settlement
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040

DATED: June 8, 2022

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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

PROOF OF CLAIM AND RELEASE

I. GENERAL INSTRUCTIONS

1. To recover as a Member of the Class based on your claims in the action entitled *Kornecki v. Airbus SE, et al.*, No. 2:20-cv-10084-KM-JBC (the "Litigation"), you must complete and, on page 7 hereof, sign this Proof of Claim and Release form ("Proof of Claim").¹ If you fail to file a properly addressed (as set forth in paragraph 3 below) Proof of Claim, your claim may be rejected and you may be precluded from any recovery from the Settlement Fund created in connection with the proposed Settlement of the Litigation.

2. Submission of this Proof of Claim, however, does not assure that you will share in the proceeds of the Settlement of the Litigation.

3. YOU MUST MAIL OR SUBMIT ONLINE YOUR COMPLETED AND SIGNED PROOF OF CLAIM, ACCOMPANIED BY COPIES OF THE DOCUMENTS REQUESTED HEREIN, ON OR BEFORE SEPTEMBER 13, 2022, ADDRESSED AS FOLLOWS:

Airbus Securities Settlement, Claims Administrator, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040
Online Submissions: www.AirbusSecuritiesSettlement.com

If you are NOT a Member of the Class, as defined in the Notice of Pendency and Proposed Settlement of Class Action ("Notice"), or if you have submitted a request for exclusion, DO NOT submit a Proof of Claim.

4. If you are a Member of the Class, you are bound by the terms of any judgment entered in the Litigation, WHETHER OR NOT YOU SUBMIT A PROOF OF CLAIM.

5. It is important that you completely read and understand the Notice that accompanied this Proof of Claim, including the Plan of Allocation of the Net Settlement Fund set forth in the Notice. The Notice describes the proposed Settlement, how Class Members are affected by the Settlement, and the manner in which the Net Settlement Fund will be distributed if the Settlement and Plan of Allocation are approved by the Court. The Notice also contains the definitions of many of the defined terms (which are indicated by initial capital letters) used in this Proof of Claim. By signing and submitting this Proof of Claim, you will be certifying that you have read and that you understand the Notice, including the terms of the releases described and provided herein.

6. The distribution of the Net Settlement Fund will be governed by the Plan of Allocation set forth in the Notice, if it is approved by the Court, or by such other plan of allocation as the Court approves.

II. DEFINITIONS

1. "Airbus" means Airbus SE.
2. "Defendants" means Airbus, Guillaume M.J.D. Faury, Tom Enders, Dominik Asam, and Harald Wilhelm.
3. "Released Parties" means each and all of the Defendants, and each and all of their respective Related Parties.
4. "Securities" or "Airbus Securities" means the Company's ADRs that traded in the United States on the over-the-counter market ("OTC") under the ticker symbol "EADSY," and the Company's foreign ordinaries that traded in the United States on the OTC market under the ticker symbol "EADSF."

III. CLAIMANT IDENTIFICATION

1. If you purchased or acquired Airbus Securities in the United States and held the certificate(s) in your name, you are the beneficial owner as well as the record holder. If, however, the certificate(s) were registered in the name of a third party, such as a brokerage firm or other nominee, you are the beneficial owner and the third party is the record holder.

2. You are a Class Member if you purchased or acquired Airbus Securities in the United States from February 24, 2016 through July 30, 2020, inclusive, and were allegedly damaged thereby. Excluded from the Class are: (i) Defendants, (ii) the current and Class Period officers and directors of the Company, (iii) members of the immediate families of the Individual Defendants, and (iv) the legal representatives, heirs, successors-in-interest, or assigns of any excluded person or entity, and

¹ This Proof of Claim incorporates by reference the definitions in the Amended Stipulation and Agreement of Settlement dated June 7, 2022 ("Stipulation"), which can be obtained at www.AirbusSecuritiesSettlement.com.

any entity in which such excluded persons have or had a controlling interest. Also excluded from the Class are those Persons who timely and validly request exclusion from the Class pursuant to the Notice.

3. Use Part I of this form entitled "Claimant Identification" to identify each holder of record ("nominee"), if different from the beneficial owner of such Airbus Securities that forms the basis of this claim. THIS CLAIM MUST BE FILED BY THE ACTUAL BENEFICIAL OWNER(S), OR A PERSON AUTHORIZED TO ACT ON BEHALF OF SUCH OWNER(S), OF SUCH AIRBUS SECURITIES UPON WHICH THIS CLAIM IS BASED. Separate Proofs of Claim should be submitted for each separate legal entity (for example, a claim by joint owners should not include the transactions of just one of the joint owners, and an individual should not submit one claim that combines his or her IRA transactions with transactions made solely in the individual's name). Conversely, a combined Proof of Claim should be submitted on behalf of each legal entity (including an individual) that includes all transactions made by the entity, no matter how many separate accounts that entity has (for example, a corporation/individual with multiple brokerage accounts should include all transactions made in Airbus Securities during the Class Period on one Proof of Claim, no matter in how many accounts the transactions were made).

4. All joint owners (or a Person authorized to act on the owner's behalf) must sign this claim. Executors, administrators, guardians, conservators, trustees, or others authorized to act on behalf of a beneficial owner, must complete and sign this claim on behalf of Persons represented by them and their authority must accompany this claim and their titles or capacities must be stated. The Social Security (or taxpayer identification) number and telephone number of the beneficial owner may be used in verifying the claim. Failure to provide the foregoing information could delay verification of your claim or result in rejection of the claim.

IV. CLAIM FORM

1. Use Part II of this form entitled "Schedule of Transactions in Airbus Foreign Ordinaries ("EADSF") Traded in the United States" and Part III of this form entitled "Schedule of Transactions in Airbus ADRs ("EADSY") Traded in the United States" to supply all required details of your transaction(s) in Airbus Securities in the United States. If you need more space or additional schedules, attach separate sheets giving all of the required information in substantially the same form. Sign and print or type your name on each additional sheet.

2. On the schedules, provide all of the requested information with respect to **all** of your purchases and acquisitions and **all** of your sales of Airbus Securities that took place at any time between February 24, 2016 through October 28, 2020, inclusive, whether such transactions resulted in a profit or a loss. You must also provide all of the requested information with respect to **all** of the shares of Airbus Securities you held at the close of trading on February 23, 2016, July 30, 2020, and October 28, 2020. Failure to report all such transactions may result in the rejection of your claim.

3. List each transaction separately and in chronological order, by trade date, beginning with the earliest. You must accurately provide the month, day, and year of each transaction you list.

4. The date of covering a "short sale" is deemed to be the date of purchase of Airbus Securities. The date of a "short sale" is deemed to be the date of the sale of Airbus Securities. A purchase or sale of Airbus Securities shall be deemed to have occurred on the "contract" or "trade" date as opposed to the "settlement" or "payment" date; please provide any "contract" or "trade" dates in your claim.

5. Broker confirmations or other documentation of your transactions in Airbus Securities should be attached to your claim. Failure to provide this documentation could delay verification of your claim or result in rejection of your claim.

6. The above requests are designed to provide the minimum amount of information necessary to process the most simple claims. The Claims Administrator may request additional information as required to efficiently and reliably calculate your losses. In some cases where the Claims Administrator cannot perform the calculation accurately or at a reasonable cost to the Class with the information provided, the Claims Administrator may condition acceptance of the claim upon the production of additional information and/or the hiring of an accounting expert at the claimant's cost.

7. If the Court approves the Settlement, payments to eligible Authorized Claimants pursuant to the Plan of Allocation (or such other plan of allocation as the Court approves) will be made after any appeals are resolved, and after the completion of all claims processing. The claims processing will take substantial time to complete fully and fairly. Please be patient.

PLEASE NOTE: As set forth in the Plan of Allocation, each Authorized Claimant shall receive his, her, or its *pro rata* share of the Net Settlement Fund. If the prorated payment to any Authorized Claimant calculates to less than \$10.00, it will not be included in the calculation and no distribution will be made to that Authorized Claimant.

NOTICE REGARDING ELECTRONIC FILES: Certain claimants with large numbers of transactions may request, or may be requested, to submit information regarding their transactions in electronic files. This is different from the online submission process that is available at www.AirbusSecuritiesSettlement.com. All claimants MUST submit a manually signed paper Proof of Claim whether or not they also submit electronic copies. If you have a large number of transactions and wish to file your claim electronically, you must contact the Claims Administrator at edata@gilardi.com to obtain the required file layout. Any file not in accordance with the required electronic filing format will be subject to rejection. Only one claim should be submitted for each separate legal entity and the complete name of the beneficial owner(s) of the securities must be considered to have been submitted unless the Claims Administrator issues an email to that effect. Do not assume that your file has been received until you receive this email. If you do not receive such an email within 10 days of your submission, you should contact the electronic filing department at edata@gilardi.com to inquire about your file and confirm it was received. Distribution payments must be made by check or electronic payment payable to the Authorized Claimant (beneficial account owner). The Third Party Filer shall not be the payee of any distribution payment check or electronic distribution payment.

Official
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Only

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Kornecki v. Airbus SE, et al.

No. 2:20-cv-10084-KM-JBC

PROOF OF CLAIM AND RELEASE

**Must Be Postmarked (if Mailed) or
Received (if Submitted Online) No
Later Than September 13, 2022**

A4B

Please Type or Print in the Boxes Below
Do NOT use Red Ink, Pencil, or Staples

REMEMBER TO ATTACH COPIES OF BROKER CONFIRMATIONS OR OTHER DOCUMENTATION OF YOUR TRANSACTIONS IN AIRBUS SECURITIES. FAILURE TO PROVIDE THIS DOCUMENTATION COULD DELAY VERIFICATION OF YOUR CLAIM OR RESULT IN REJECTION OF YOUR CLAIM.

PART I. CLAIMANT IDENTIFICATION

Last Name M.I. First Name

Last Name (Co-Beneficial Owner) M.I. First Name (Co-Beneficial Owner)

IRA Joint Tenancy Employee Individual Other

Company Name (Beneficial Owner - If Claimant is not an Individual) or Custodian Name if an IRA (specify)

Trustee/Asset Manager/Nominee/Record Owner's Name (If Different from Beneficial Owner Listed Above)

Account#/Fund# (Not Necessary for Individual Filers)

Last Four Digits of Social Security Number or Taxpayer Identification Number

Telephone Number (Primary Daytime) Telephone Number (Alternate)

Email Address

MAILING INFORMATION

Address

Address (Continued)

City State ZIP Code

Foreign Province Foreign Postal Code Foreign Country Name/Abbreviation

FOR CLAIMS PROCESSING ONLY	OB <input type="text"/>	CB <input type="text"/>	<input type="radio"/> ATP	<input type="radio"/> BE	<input type="radio"/> FL	<input type="radio"/> OP	MM / DD / YYYY	FOR CLAIMS PROCESSING ONLY
			<input type="radio"/> KE	<input type="radio"/> DR	<input type="radio"/> ME	<input type="radio"/> RE		
			<input type="radio"/> ICI	<input type="radio"/> EM	<input type="radio"/> ND	<input type="radio"/> SH		



V. SUBMISSION TO JURISDICTION OF COURT AND ACKNOWLEDGMENTS

I (We) submit this Proof of Claim under the terms of the Stipulation, described in the Notice. I (We) also submit to the jurisdiction of the United States District Court for the District of New Jersey, with respect to my (our) claim as a Class Member (as defined in the Notice) and for purposes of enforcing the release set forth herein. I (We) further acknowledge that I am (we are) bound by and subject to the terms of any judgment that may be entered in the Litigation. I (We) agree to furnish additional information to Lead Counsel to support this claim if required to do so. I (We) have not submitted any other claim covering the same purchases or acquisitions of Airbus Securities during the Class Period and know of no other Person having done so on my (our) behalf.

VI. RELEASE

1. I (We) hereby acknowledge full and complete satisfaction of, and do hereby fully, finally, and forever settle, release, relinquish, and discharge, all of the Released Claims against each and all of the Defendants and each and all of their respective "Related Parties." The term "Related Parties" means each of a Defendant's past or present directors, officers, employees, partners, insurers, co-insurers, reinsurers, principals, controlling shareholders, members, agents, administrators, attorneys, accountants, auditors, bankers, underwriters, investment advisors, personal or legal representatives, predecessors, successors, direct and/or indirect parents, subsidiaries, divisions, joint ventures, partnerships, limited liability companies, affiliates, assigns, spouses, heirs, estates, related or affiliated entities, any entity in which a Defendant has a controlling interest, any member of a Defendant's immediate family, any trust of which a Defendant is the settlor or which is for the benefit of a Defendant and/or any member of a Defendant's immediate family, and any entity in which a Defendant and/or any member of a Defendant's immediate family has or had a controlling interest (directly or indirectly).

2. "Released Claims" means all claims, rights, liabilities, and causes of action of every nature and description, including both known claims and Unknown Claims (as defined below), rights, demands, liabilities or causes of action of every nature and description whatsoever (including, but not limited to, any claims for damages, interest, attorneys' fees, expert or consulting fees, and any other costs, expenses, or liabilities whatsoever), to the fullest extent that the law permits their release in this Litigation, by or on behalf of Lead Plaintiff or any other Class Members against any of the Released Parties that have been alleged or could have been alleged in this Litigation (or in any forum or proceeding or otherwise), whether based on federal, state, local, statutory, or common or foreign law, or any other law, rule, or regulation, whether known claims or Unknown Claims, whether class, representative, or individual in nature, whether fixed or contingent, accrued or unaccrued, liquidated or unliquidated, whether at law or in equity, matured or unmatured, that are based on, relate to, or arise out of both (i) the allegations, transactions, facts, matters, events, disclosures, statements, occurrences, circumstances, representations, conduct, acts, or omissions or failures to act that have been or could have been alleged or asserted in the Litigation, and (ii) Lead Plaintiff's or any other Class Member's purchase of Airbus Securities in the United States during the Class Period. Notwithstanding the foregoing, "Released Claims" does not include claims relating to the enforcement of the Settlement.

3. "Unknown Claims" means collectively any Released Claims that Lead Plaintiff or any other Class Member does not know or suspect to exist in his, her or its favor at the time of the release of the Released Parties which, if known by him, her or it, might have affected such Class Member's settlement or decisions with respect to the Settlement, including, but not limited to, the release of the Released Parties or the decision not to object to or opt out of this Settlement. "Unknown Claims" also means any Released Defendants' Claims that Defendants do not know or suspect to exist in their favor at the time of the release of the Released Plaintiff Parties, including Plaintiff's Counsel and Class Members, which if known by them, might have affected their settlement or decisions with respect to the Settlement, including, but not limited to, the release of the Released Plaintiff Parties. Unknown Claims include, without limitation, those claims in which some or all of the facts composing the claim may be unsuspected, undisclosed, concealed, or hidden. With respect to any and all Released Claims and Released Defendants' Claims, the Released Parties stipulate and agree that, upon the Effective Date, Lead Plaintiff and Class Members (as regards the Released Claims) and the Defendants (as regards the Released Defendants' Claims) shall expressly waive and relinquish, and each Class Member shall be deemed to have and by operation of law and of the Judgment shall have, expressly waived and relinquished, to the fullest extent permitted by law, any and all provisions, rights and benefits conferred by California Civil Code §1542, or any law of any state or territory of the United States, or principle of common law or of international or foreign law, which is similar, comparable, or equivalent to Cal. Civ. Code §1542, which provides:

A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.

Lead Plaintiff and Class Members may hereafter discover facts in addition to or different from those which he, she or it now knows or believes to be true with respect to the subject matter of the Released Claims, but Lead Plaintiff shall expressly fully, finally, and forever settle and release, and each Class Member, upon the Effective Date, shall be deemed to have, and by operation of the Judgment shall have, fully, finally, and forever settled and released, any and all Released Claims, known or unknown, suspected or unsuspected, contingent or non-contingent, whether or not concealed or hidden, which now exist, or heretofore have existed, upon any theory of law or equity now existing or coming into existence in the future, including, but not limited to, conduct which is negligent, intentional, with or without malice, or a breach of any duty, law or rule, without regard to the subsequent discovery or



existence of such different or additional facts. Lead Plaintiff and Defendants acknowledge, and Class Members shall be deemed by operation of law (including by operation of the Judgment) to have acknowledged, that the foregoing waiver was separately bargained for and is a key element of the Settlement.

- 4. This release shall be of no force or effect unless and until the Court approves the Stipulation and it becomes effective on the Effective Date.
- 5. I (We) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to this release or any other part or portion thereof.
- 6. I (We) hereby warrant and represent that I (we) have included information about all of my (our) transactions in Airbus Securities that occurred during the Class Period as well as the number of shares of Airbus Securities held by me (us) at the close of trading on February 23, 2016, July 30, 2020, and October 28, 2020.
- 7. I (We) hereby warrant and represent that the transactions listed above are in Airbus Securities that traded in the United States.
- 8. I (We) hereby warrant and represent that I am (we are) not excluded from the Class, as defined in the Notice.

I (We) declare under penalty of perjury under the laws of the United States of America that the foregoing information supplied by the undersigned is true and correct.

Executed this _____ day of _____ in _____
(Month/Year) (City/State/Country)

(Sign your name here)

(Sign your name here)

(Type or print your name here)

(Type or print your name here)

(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)

(Capacity of person(s) signing, e.g.,
Beneficial Purchaser or Acquirer, Executor or Administrator)

**ACCURATE CLAIMS PROCESSING TAKES A SIGNIFICANT AMOUNT OF TIME.
THANK YOU FOR YOUR PATIENCE.**

Reminder Checklist:

- 1. Please sign the above release and acknowledgment.
- 2. Remember to attach supporting documentation, if available.
- 3. Do not send original stock certificates.
- 4. Keep a copy of your Proof of Claim for your records.
- 5. If you desire an acknowledgment of receipt of your Proof of Claim, please send it Certified Mail, Return Receipt Requested.
- 6. If you move, please send us your new address.

**THIS PROOF OF CLAIM MUST BE SUBMITTED ONLINE OR MAILED
NO LATER THAN SEPTEMBER 13, 2022, ADDRESSED AS FOLLOWS:**

Airbus Securities Settlement
Claims Administrator
c/o Gilardi & Co. LLC
P.O. Box 8040
San Rafael, CA 94912-8040
www.AirbusSecuritiesSettlement.com



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EXHIBIT B



1 McInnis Parkway
Suite 250
San Rafael, CA 94903
P: (415) 458-3015

June 15, 2022

«FirstName» «LastName»
«Company»
«Addr1»
«Addr2»
South Bend, IN 46601
«FCountry»

Re: Airbus Securities Settlement

Dear «GENDER» «LastName»:

Please find enclosed the Notice of Pendency and Proposed Settlement of Class Action (“Notice”) and Proof of Claim and Release (“Proof of Claim”) for the above-referenced litigation. Please note both the class period and the designated eligible securities described on page one of the Notice, specifically the inclusion of all Persons who purchased or otherwise acquired Airbus SE (“Airbus”) Securities in the United States as American Depository Receipts (“ADRs”) or foreign ordinaries under the ticker symbols “EADSY” and “EADSF” during the period between February 24, 2016 through and including July 30, 2020, and were allegedly damaged thereby, and are not otherwise excluded from the Settlement Class. In addition, **the Notice provides that the Exclusion Deadline is September 9, 2022, and the Claim Filing Deadline is September 13, 2022.**

Please pay particular attention to the "Special Notice to Securities Brokers and Other Nominees" on page twelve of the Notice which states, in part: “If you purchased or acquired Airbus Securities during the Class Period for the beneficial interest of an individual or organization other than yourself, the Court has directed that, WITHIN TEN (10) DAYS OF YOUR RECEIPT OF THIS NOTICE, you either (a) provide to the Claims Administrator the name and last known address of each person or organization for whom or which you purchased or acquired such securities during such time period, or (b) request additional copies of this Notice and the Proof of Claim, which will be provided to you free of charge, and within ten (10) days mail the Notice and Proof of Claim via First Class mail directly to the beneficial owners of the securities referred to herein. If you choose to follow alternative procedure (b), upon such mailing, you must send a statement to the Claims Administrator confirming that the mailing was made as directed and retain the names and addresses for any future mailings to Class Members.

Please do not make your own copies of the Proof of Claim form, as copies may not be accepted for processing. Additional copies of the appropriate documents may be requested by contacting us at the above address and/or phone number. If we conduct the necessary mailing on your behalf, please submit names and addresses either via email to Notifications@Gilardi.com, via CD Rom to the above address or contact us to obtain secure FTP transmission instructions. Mailing labels will be accepted, but you may be requested to provide an additional copy of the address information you send. Do not include any confidential information that should not appear on a mailing label.

The data provided must be in one of the following formats:

- ASCII Fixed Length file
- ASCII Tab Delimited file
- Microsoft Excel spreadsheet

Your request must also specify the case name and control total(s) (for example, the total number of name and address records provided) for each file submission.

If you have any questions, please email Notifications@Gilardi.com.

Sincerely,

Gilardi & Co., LLC

EXHIBIT C

NEW HIGHS AND LOWS

The following explanations apply to the New York Stock Exchange, NYSE Arca, NYSE American and Nasdaq Stock Market stocks that hit a new 52-week intraday high or low in the latest session. % CHG-Daily percentage change from the previous trading session.

Table with columns for Stock, 52-Wk % High/Low, and % Change. Includes sections for 'Highs' and 'Lows' with various stock tickers and their performance metrics.

BANKRATE.COM MMA, Savings and CDs

Table showing Average Yields of Major Banks for various terms (1-MO to 5YR) as of Tuesday, June 21, 2022.

Consumer Savings Rates

Below are the top federally insured offers available nationwide according to Bankrate.com's weekly survey of highest yields. For latest offers and reviews of these financial institutions, please visit bankrate.com/banking/reviews. Information is believed to be reliable, but not guaranteed.

Table of High yield savings rates for various bank products including Money market and savings account, Six-month CD, One-month CD, Two-month CD, Three-month CD, and Five-year CD.

High yield jumbos - Minimum is \$100,000

Table of High yield jumbos rates for various bank products including Money market and savings account, Six-month CD, One-month CD, Two-month CD, Three-month CD, and Five-year CD.

Notes: Accounts are federally insured up to \$250,000 per person. Yields are based on method of compounding and rate stated for the lowest required opening deposit to earn interest. CD figures are for fixed rates only. MMA: Always six (6) third-party transfers per month, three (3) of which may be checks. Rates are subject to change.

Source: Bankrate.com, a publication of Bankrate, Inc., Palm Beach Gardens, FL 33410 Internet: www.bankrate.com

Borrowing Benchmarks

wsj.com/market-data/bonds/benchmarks

Money Rates

June 21, 2022

Key annual interest rates paid to borrow or lend money in U.S. and international markets. Rates below are a guide to general levels but don't always represent actual transactions.

Table of Money Rates including Inflation, U.S. consumer price index, International rates, Treasury bill auction, Prime rates, U.S. rates, Policy Rates, Overnight repurchase, U.S. government rates, and Discount rates.

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CLASS ACTIONS

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ANDREW J. KORNECKI, Individually and on Behalf of All Others Similarly Situated, vs. AIRBUS SE, et al., Plaintiff, Defendant.

TO: ALL PERSONS WHO PURCHASED OR OTHERWISE ACQUIRED AIRBUS ("AIRBUS" OR THE "COMPANY") SECURITIES IN THE UNITED STATES AS AMERICAN DEPOSITORY RECEIPTS ("ADR") OR FOREIGN ORDINARIES UNDER THE TICKER SYMBOLS "EADS" AND "EADS.F", RESPECTIVELY, DURING THE PERIOD BETWEEN FEBRUARY 24, 2016 THROUGH AND INCLUDING JULY 30, 2020, AND WERE ALLEGEDLY DAMAGED THEREBY, AND ARE NOT OTHERWISE EXCLUDED FROM THE SETTLEMENT CLASS.

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the United States District Court for the District of New Jersey, that a hearing will be held on September 30, 2022, at 2:00 p.m., before the Honorable Kevin McNulty, United States District Judge, at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for the purpose of determining: (1) whether the proposed Settlement of the claims in the Litigation for the principal amount of \$5 million, plus interest, should be approved by the Court as fair, reasonable, and adequate; (2) whether a Class should be certified for purposes of settlement; (3) whether a Final Judgment and Order of Dismissal with Prejudice should be entered by the Court dismissing the Litigation with prejudice; (4) whether the Plan of Allocation is fair, reasonable, and adequate and should be approved; and (5) whether the application of Lead Counsel for the payment of attorneys' fees and expenses and Lead Plaintiff's expenses in connection with this Litigation should be approved.

IF YOU PURCHASED OR OTHERWISE ACQUIRED ANY AIRBUS ADRS OR FOREIGN ORDINARIES IN THE UNITED STATES DURING THE PERIOD FROM FEBRUARY 24, 2016 THROUGH AND INCLUDING JULY 30, 2020, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION. Airbus ADRs trade in the U.S. on the over-the-counter market (the "OTC") under the ticker symbol "EADSY" and Airbus foreign ordinaries trade in the U.S. on the OTC market under the ticker symbol "EADSF." Excluded from the Settlement Class are: (i) Defendants, (ii) the current and Class Period officers and directors of the Company, (iii) members of the immediate families of the Individual Defendants, and (iv) the legal representatives, heirs, successors-in-interest, or assigns of any excluded person or entity, and any entity in which such excluded persons have or had a controlling interest. Also excluded from the Settlement Class are those Persons who timely and validly exclude themselves therefrom by submitting a request for exclusion. If you have not received a detailed Notice of Pendency and Proposed Settlement of Class Action ("Notice") and a copy of the Proof of Claim and Release form, you may obtain copies by writing to Airbus Securities Settlement, Claims Administrator, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040, or on the internet at www.AirbusSecuritiesSettlement.com. If you are a Class Member, in order to share in the distribution of the Net Settlement Fund, you must submit a Proof of Claim and Release by mail or online no later than September 13, 2022, establishing that you are entitled to a recovery. If you request to be excluded from the Class, you must submit a request for exclusion postmarked by September 9, 2022, in the form and manner explained in the detailed Notice. You will be bound by any judgment entered in the Litigation unless you request to be excluded, in writing, to Airbus Securities Settlement, c/o Gilardi & Co. LLC, EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100, postmarked by September 9, 2022.

Any objection to the Settlement, the Plan of Allocation, and/or the fee and expense application must be received, not simply postmarked, by each of the following recipients no later than September 9, 2022:

CLERK OF THE COURT UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY Martin Luther King Building & U.S. Courthouse 50 Walnut Street, Room 4015 Newark, NJ 07102

Lead Counsel: ROBBINS GELLER RUDMAN & DOWD LLP BRIAN O. O'MARA 655 West Broadway, Suite 1900 San Diego, CA 92101

Defendants' Counsel: PAUL HASTINGS LLP D. SCOTT CARLTON 515 S. Flower Street, 25th Floor Los Angeles, CA 90071

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE. If you have any questions about the Settlement, you may contact Lead Counsel at the address listed above.

Dated: June 8, 2022

BY ORDER OF THE COURT UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

BUSINESS OPPORTUNITIES

PHARMACEUTICAL INVESTMENT OPPORTUNITY US company w FDA approved drug - wide range of medical/dental uses incl. Domestic & Intl. Patents seeking Strategic 970.692.7051

BUSINESS OPPORTUNITIES

ALLIANCE MORTGAGE FUND 7%-8% RETURN REAL ESTATE SECURED FIXED INCOME FUND SEEKING RIAs & ACCREDITED INVESTORS CALL: 866-700-0600

CAREERS

M & A BUSINESS BROKERS Sell & Show Businesses Oppty To Earn \$200K to \$700K As Independent Contractor Work From Home / Outside Sales Leads Furnished • Training • Support 1985 Send Letter & Resume to: brokers@gottesman-company.com

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Declaration of Publication

I, Carla Peak, as Vice President, Legal Notification Services at Gilardi & Co. LLC, a KCC Class Action Services Company in San Rafael, California, hereby certify that I caused the attached notice to be printed in said publication on June 22, 2022:

Name of Publication: The Wall Street Journal

Address: 1211 Avenue of the Americas

City, State, Zip: New York, NY 10036

Phone #: 1-800-568-7625

State of: New York

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 22nd June 2022, at Sellersville, Pennsylvania.

A handwritten signature in black ink that reads "Carla Peak". The signature is written in a cursive style and is positioned above a horizontal line.

Carla Peak



Robbins Geller Rudman & Dowd LLP Announces Proposed Settlement in the Airbus Securities Settlement

June 22, 2022 08:00 AM Eastern Daylight Time

SAN DIEGO--(BUSINESS WIRE)--The following statement is being issued by Robbins Geller Rudman & Dowd LLP regarding the Airbus Securities Settlement:

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ANDREW J. KORNECKI, Individually and) No. 2:20-cv-10084-KM-JBC
on Behalf of All Others Similarly Situated,)

Plaintiff,)

vs.)

AIRBUS SE, et al.,)

Defendants.)

) CLASS ACTION

) SUMMARY NOTICE

TO: ALL PERSONS WHO PURCHASED OR OTHERWISE ACQUIRED AIRBUS SE ("AIRBUS" OR THE "COMPANY") SECURITIES IN THE UNITED STATES AS AMERICAN DEPOSITARY RECEIPTS ("ADR") OR FOREIGN ORDINARIES UNDER THE TICKER SYMBOLS "EADSY" AND "EADSF," RESPECTIVELY, DURING THE PERIOD BETWEEN FEBRUARY 24, 2016 THROUGH AND INCLUDING JULY 30, 2020, AND WERE ALLEGEDLY DAMAGED THEREBY, AND ARE NOT OTHERWISE EXCLUDED FROM THE SETTLEMENT CLASS

YOU ARE HEREBY NOTIFIED, pursuant to an Order of the United States District Court for the District of New Jersey, that a hearing will be held on September 30, 2022, at 2:00 p.m., before the Honorable Kevin McNulty, United States District Judge, at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, for the purpose of determining: (1) whether the proposed Settlement of the claims in the Litigation for the principal amount of \$5 million, plus interest, should be approved by the Court as fair, reasonable, and adequate; (2) whether a Class should be certified for purposes of settlement; (3) whether a Final Judgment and Order of Dismissal with Prejudice should be entered by the Court dismissing the Litigation with prejudice; (4) whether the Plan of Allocation is fair, reasonable, and adequate and should be approved; and (5) whether the application of Lead Counsel for the payment of attorneys' fees and expenses and Lead Plaintiff's expenses in connection with this Litigation should be approved.

IF YOU PURCHASED OR OTHERWISE ACQUIRED ANY AIRBUS ADRS OR FOREIGN ORDINARIES IN THE UNITED STATES DURING THE PERIOD FROM FEBRUARY 24, 2016 THROUGH AND INCLUDING JULY 30, 2020, YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT OF THIS LITIGATION. Airbus ADRs trade in the U.S. on the over-

the counter market (the "OTC") under the ticker symbol "EADSY," and Airbus foreign derivatives trade in the U.S. on the OTC market under the ticker symbol "EADSF." Excluded from the Settlement Class are: (i) Defendants, (ii) the current and Class Period officers and directors of the Company, (iii) members of the immediate families of the Individual Defendants, and (iv) the legal representatives, heirs, successors-in-interest, or assigns of any excluded person or entity, and any entity in which such excluded persons have or had a controlling interest. Also excluded from the Settlement Class are those Persons who timely and validly exclude themselves therefrom by submitting a request for exclusion. If you have not received a detailed Notice of Pendency and Proposed Settlement of Class Action ("Notice") and a copy of the Proof of Claim and Release form, you may obtain copies by writing to *Airbus Securities Settlement*, Claims Administrator, c/o Gilardi & Co. LLC, P.O. Box 8040, San Rafael, CA 94912-8040, or on the internet at www.AirbusSecuritiesSettlement.com. If you are a Class Member, in order to share in the distribution of the Net Settlement Fund, you must submit a Proof of Claim and Release by mail or online **no later than September 13, 2022**, establishing that you are entitled to a recovery. If you request to be excluded from the Class, you must submit a request for exclusion postmarked by September 9, 2022, in the form and manner explained in the detailed Notice. You will be bound by any judgment entered in the Litigation unless you request to be excluded, in writing, to *Airbus Securities Settlement*, c/o Gilardi & Co. LLC, EXCLUSIONS, P.O. Box 5100, Larkspur, CA 94977-5100, **postmarked by September 9, 2022**.

Any objection to the Settlement, the Plan of Allocation, and/or the fee and expense application must be **received**, not simply postmarked, by each of the following recipients **no later than September 9, 2022**:

CLERK OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07102

Lead Counsel:

ROBBINS GELLER RUDMAN & DOWD LLP
BRIAN O. O'MARA
655 West Broadway, Suite 1900
San Diego, CA 92101

Defendants' Counsel:

PAUL HASTINGS LLP
D. SCOTT CARLTON
515 S. Flower Street, 25th Floor
Los Angeles, CA 90071

PLEASE DO NOT CONTACT THE COURT OR THE CLERK'S OFFICE REGARDING THIS NOTICE. If you have any questions about the Settlement, you may contact Lead Counsel at the address listed above.

Dated: June 8, 2022

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Contacts

Media:

Robbins Geller Rudman & Dowd LLP
Shareholder Relations Department

Greg Wood

(619) 231-1058

Declaration of Publication

I, Carla Peak, as Vice President, Legal Notification Services at Gilardi & Co. LLC, a KCC Class Action Services Company in San Rafael, California, hereby certify that I caused the attached notice to be published as a press release by the following wire service:

Name of Publication: BusinessWire
Address: 101 California Street 20th Floor
City, ST Zip: San Francisco, CA 94111
Phone #: 415-986-4422
State of: California

The press release was distributed on June 22, 2022 to the following media circuits offered by the above-referenced wire service:

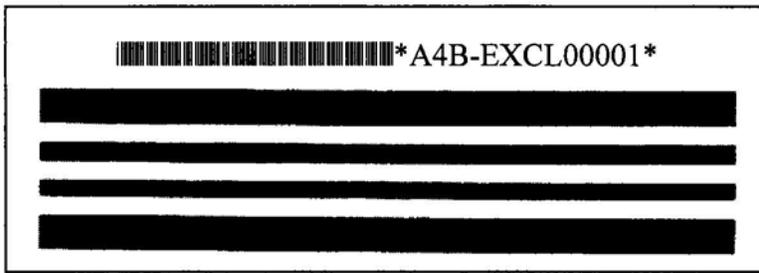
1. US1 National Newsline

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 22nd day of June 2022, at Sellersville, Pennsylvania.



Carla Peak
Carla Peak

EXHIBIT D



RECEIVED
July 12, 2022
Claims Center

Exclusion Cover Page

Case Name: Airbus Securities Settlement

Case Code: A4B

Exclusion Deadline: September 9, 2022 (postmarked on or before)

Name of Person Filing Exclusion: Leonard and Eileen DeStefano JT TEN

[REDACTED]
July 5, 2022

Airbus Securities Settlement
c/o Gilardi & Co, LLC
EXCLUSIONS
P. O. Box 5100
Larkspur, CA 94977-5100

Re: Airbus Securities Settlement

This is to advise you that both I (Leonard DeStefano) and my wife (Eileen DeStefano), JT TEN, wish to be excluded from the Airbus Securities Settlement.

We bought and sold 72 shares of Airbus stock in a Morgan Stanley account during the class action period February 24, 2016 thru July 30, 2020. Below is a summary of these transactions:

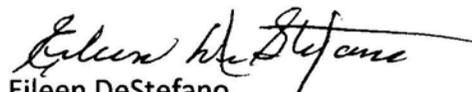
Bought 6 shares on May 24, 2019 at a price of \$32.78 per share
Bought 13 shares on June 6, 2019 at a price of \$33.30 per share
Bought 13 shares on August 1, 2019 at a price of \$35.62 per share
Bought 12 shares on August 19, 2019 at a price of \$34.63 per share
Bought 8 shares on October 1, 2019 at a price of \$31.88 per share
Bought 19 shares on December 3, 2019 at a price of \$34.37 per share
Bought 1 share on May 20, 2020 at a price of \$14.99 per share

Sold 16 shares on June 19, 2020 at a price of \$19.21 per share
Sold 28 shares on June 24, 2020 at a price of \$17.97 per share
Sold 15 shares on June 29, 2020 at a price of \$17.96 per share
Sold 13 shares on July 2, 2020 at a price of \$18.40 per share

The above transactions are based on Morgan Stanley monthly statements from May 2019 thru July 2020 and no other shares of Airbus stock were bought or sold during the litigation period. All shares purchased were designated EADSY.

Our home address is [REDACTED] and our home phone number is [REDACTED]


Leonard DeStefano


Eileen DeStefano



6 JUL 2022 PM 6 L

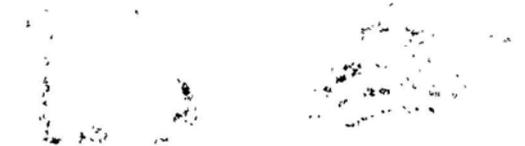
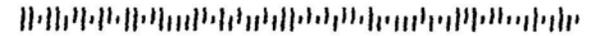


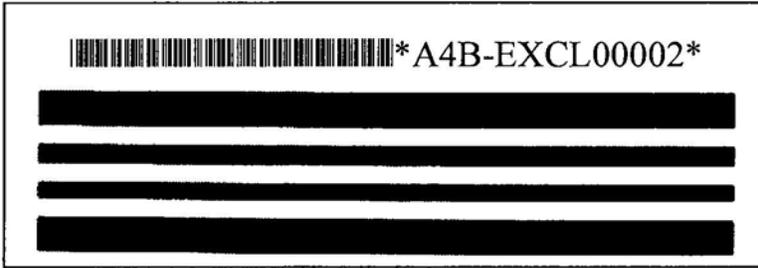
7/26/22
6:00 PM
LARKSPUR, CA

Airbus Securities Settlement
40 Gilardi & Co LLC
EXCLUSIONS
P. O. Box 5100
Larkspur, CA 94977-5100

A 4 B

94977-510000





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August 3, 2022
Claims Center

Exclusion Cover Page

Case Name: Airbus Securities Settlement

Case Code: A4B

Exclusion Deadline: September 9, 2022 (Postmark on or before)

Name of Person Filing Exclusion: Tony Dodak

To whom it may concern:

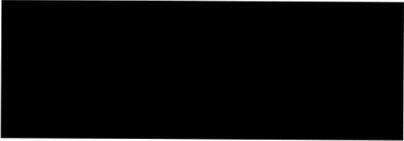
I would to request exclusion from the Settlement Class in the Airbus Securities Settlement, since I have never purchasing any Airbus Securities.

Sincerely,
Tony Dodak

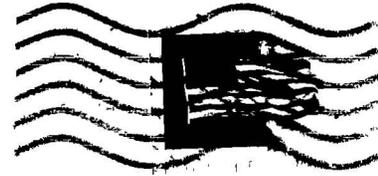


A handwritten signature in black ink, appearing to read 'Tony Dodak'.

Tony Dodak



18 JUL 2022 PM 10 L



Airbus Securities Settlement
c/o Gilardi & Co. LLC
Exclusions
P.O. Box 5100
Larkspur, CA 94977-5100

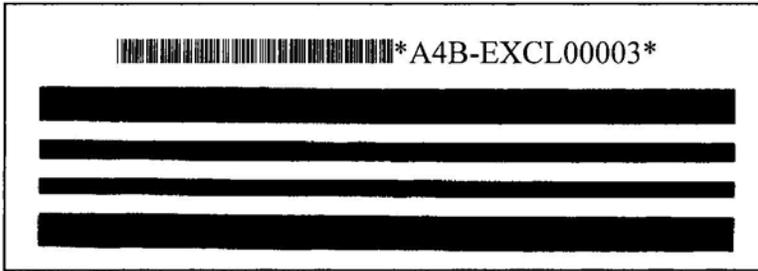
RECEIVED

AUG 03 2022

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94977-510000





RECEIVED
August 17, 2022
Claims Center

Exclusion Cover Page

Case Name: Airbus Securities Settlement

Case Code: A4B

Exclusion Deadline: September 9, 2022 (postmarked on or before)

Name of Person Filing Exclusion: Justine Lo

Dear Airbus Securities Settlement Team,

I would like to request exclusion from the Settlement Class in the Airbus Securities Settlement.

The shares I have acquired during the settlement period include the following:

Date Acquired	# of Shares	Price / Share @ Date of Purchase
5/28/2020	241	\$16.65
5/28/2020	42	\$16.62
4/24/2020	70	\$14.28
4/15/2020	132	\$15.18

Name: Justine Lo

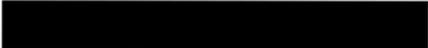
Address: [REDACTED]

Telephone Number: [REDACTED]

Signature: 

Date: 8/12/2022

Jasmine Lo



12 AUG 2022PM 1 L



Airbus Securities Settlement
c/o Gilardi + Co. LLC
Exclusions
P.O. Box 5100
Larkspur, CA 94977-5100



94977-510000

