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13 Lead Counsel for Plaintiffs

14 [Additional counsel appear on signature page.]

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 COUNTY OF SANTA CLARA

17 In re MOBILEIRON, INC. SHAREHOLDER)
LITIGATION)

Lead Case No. 1-15-cv-284001

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)

CLASS ACTION

19 This Document Relates To:)
)

20 ALL ACTIONS.)
)

21 _____)
)

PLAINTIFFS' NOTICE OF NON-
OBJECTION TO MOTIONS FOR: (1) FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND APPROVAL OF PLAN
OF ALLOCATION; AND (2) AN AWARD OF
ATTORNEYS' FEES AND EXPENSES

23 Assigned to: The Honorable Thomas E. Kuhnle
24 Dept.: 5
Date Action Filed: 08/05/15

25 Hearing Date: August 18, 2017
26 Hearing Time: 9:00 a.m.

1 Plaintiffs Warren Schneider, Jay Kerley and Chaile Steinberg, on behalf of the Class certified
2 for settlement purposes, respectfully submit this notice of non-objection in further support of the
3 Motions for: (1) Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2)
4 an Award of Attorneys' Fees and Expenses.

5 This Court granted preliminary approval of the Settlement on June 9, 2017 ("Preliminary
6 Approval Order"). Pursuant to the Court's Preliminary Approval Order, the Court-appointed Claims
7 Administrator for the Settlement, Gilardi & Co. LLC, has disseminated more than 13,900 copies of the
8 Notice of Proposed Settlement of Class Action (the "Notice") to potential Class Members and their
9 nominees. See Declaration of Carole K. Sylvester Regarding Dissemination of the Notice and Proof of
10 Claim, Publication of the Summary Notice, and Requests for Exclusion Received to Date, ¶10
11 ("Sylvester Decl."), filed on August 4, 2017. In addition, the Summary Notice was transmitted over the
12 *Business Wire* and published in *The Wall Street Journal* on July 3, 2017. See Sylvester Decl., ¶13.
13 Further, a toll-free telephone number and dedicated website were created for the Settlement, and
14 relevant documents and dates were posted on the website. *Id.*, ¶¶11-12.

15 The Notice advised Class Members of the July 19, 2017 deadline for filing objections to the
16 Settlement, the proposed Plan of Allocation, request for an award of attorneys' fees and expenses, and
17 payment to Plaintiffs for their time and expenses, as well as for requesting exclusion from the Class and
18 the procedures for doing so. The July 19, 2017 deadline has now passed and Lead Counsel are not
19 aware of a single request for exclusion or objection to the Settlement, Plan of Allocation, request for an
20 award of attorneys' fees and expenses, or Plaintiffs' requests for service awards. The favorable reaction
21 of the Members of the Class supports the reasonableness of the Settlement, Plan of Allocation, and the
22 fee and expense request. See *Nat'l Rural Telecomms. Coop. v. DIRECTV, Inc.*, 221 F.R.D. 523, 529
23 (C.D. Cal. 2004) (absence of large number of objections raises a strong presumption that settlement is
24 fair to the class).

25 Accordingly, Plaintiffs and their counsel hereby request that the Court enter the Judgment and
26 Order Granting Final Approval of Class Action Settlement, which is being filed concurrently, which,
27 among other things, approves the Settlement as fair, reasonable, and adequate. Plaintiffs and their
28 counsel also request the Court to approve the Plan of Allocation and the request for an award of

1 attorneys' fees to Plaintiffs' Counsel in the amount of 33% of the Settlement Amount, together with
2 expenses in the aggregate of \$118,859.20 and awards to Plaintiffs Schneider, Kerley and Steinberg in
3 the amounts of \$1,000.00, \$985.00 and \$1,000.00, respectively, for their service to the Class. Proposed
4 orders approving the Plan of Allocation and awarding attorneys' fees and expenses and service awards
5 to Plaintiffs are being filed concurrently.

6 DATED: August 11, 2017

Respectfully submitted,

7 ROBBINS GELLER RUDMAN
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11 s/ Ellen Gusikoff Stewart

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DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interested party in the within action; that declarant’s business address is 655 West Broadway, Suite 1900, San Diego, California 92101.

2. That on August 11, 2017, declarant served **PLAINTIFFS’ NOTICE OF NON-OBJECTION TO MOTIONS FOR: (1) FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION; AND (2) AN AWARD OF ATTORNEYS’ FEES AND EXPENSES** by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 11, 2017, at San Diego, California.



JACLYN STARK

MOBILEIRON

Service List - 8/11/2017 (15-0113)

Page 1 of 2

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MOBILEIRON

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