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**SAXENA WHITE P.A.**  
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*Counsel for Lead Plaintiffs and  
Lead Counsel for the Settlement Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE FIBROGEN, INC., SECURITIES  
LITIGATION

Case No. 3:21-cv-02623-EMC

**CLASS ACTION**

DECLARATION OF DAVID R. KAPLAN IN  
SUPPORT OF LEAD PLAINTIFFS'  
UNOPPOSED MOTION FOR CLASS  
DISTRIBUTION ORDER

Hearing Date: January 30, 2025  
Time: 1:30 p.m.  
Courtroom: 5 – 17<sup>th</sup> Floor  
Judge: Hon. Edward M. Chen

1 I, David R. Kaplan, hereby declare as follows:

2 1. I am a Director of the law firm Saxena White P.A., counsel for the Court-appointed  
3 Lead Plaintiffs, Employees' Retirement System of the City of Baltimore, City of Philadelphia  
4 Board of Pensions and Retirement, and Plymouth County Retirement Association ("Lead  
5 Plaintiffs"). I am a member in good standing of the Bar of the State of California and am admitted  
6 to practice in this District. I respectfully submit this declaration in support of Lead Plaintiffs'  
7 Unopposed Motion for Class Distribution Order. The statements made herein are made of my own  
8 personal knowledge and, if called upon, I could and would testify competently thereto under oath.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of the Declaration of Luiggy  
10 Segura in Support of Lead Plaintiffs' Unopposed Motion for Class Distribution Order, and exhibits  
11 attached thereto, dated December 17, 2024.

12 3. Attached hereto as Exhibit 2 is the [Proposed] Class Distribution Order.

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14 Executed this 17th day of December, 2024.

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/s/ David R. Kaplan  
David R. Kaplan

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