## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re HERALD, PRIMEO and THEMA FUNDS Ci SECURITIES LITIGATION, (C

Civil Action No. 09 Civ. 289 (RMB) (HBP) (Consolidated with 09 Civ. 2032 and 09 Civ. 2558)

This Document Relates To:

ECF CASE

ALL ACTIONS.

## DECLARATION OF ALBERT Y. CHANG IN SUPPORT OF LEAD PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINTS

I, Albert Y. Chang, declare:

1. I am an attorney at the law firm of Johnson Bottini, LLP, Lead Counsel for Plaintiff Neville Seymour Davis in this action. I submit this declaration in support of Lead Plaintiffs' Motion For Leave To Amend Complaints. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would competently testify to these facts.

Attached as Exhibit A is a copy of Lead Plaintiff Repex Ventures S.A.'s
[Proposed] Third Amended Class Action Complaint.

3. Attached as Exhibit B is a copy of the red-lined version between Lead Plaintiff Repex Ventures S.A.'s Third Consolidated Amended Complaint and its Amended Class Action Complaint (Docket No. 74).

4. Attached as Exhibit C is a copy of Lead Plaintiff Repex Ventures S.A.'s chart of its Proposed Added Defendants.

5. Attached as Exhibit D is a copy of Lead Plaintiff Dr. Shmuel Cabilly and Plaintiff Korea Exchange Bank's Second Consolidated Amended Complaint.

Attached as Exhibit E is a copy of the red-lined version between Lead Plaintiff
Dr. Shmuel Cabilly and Plaintiff Korea Exchange Bank's Second Consolidated Amended
Complaint and their Consolidated Amended Complaint (Docket No. 75).

7. Attached as Exhibit F is a copy of Lead Plaintiff Dr. Shmuel Cabilly and Plaintiff Korea Exchange Bank's chart of their Proposed Added Defendant.

8. Attached as Exhibit G is a copy of Lead Plaintiff Neville Seymour Davis's Second Amended Class Action Complaint, together with exhibits.

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9. Attached as Exhibit H is a copy of the red-lined version between Lead Plaintiff Neville Seymour Davis's Second Consolidated Amended Complaint and his Amended Class Action Complaint (Docket No. 76).

10. Attached as Exhibit I is a copy of Lead Plaintiff Neville Seymour Davis's chart of his Proposed Added Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of April 2010, at San Diego, California.

/s/ Albert Y. Chang Albert Y. Chang