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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re JUNO THERAPEUTICS, INC.

No. C16-1069 RSM
**ORDER GRANTING PLAINTIFFS’
MOTION FOR AN ORDER
REGARDING PROGRAM AND
NOTICE**

By Order dated October 24, 2017, this Court certified the following Class in this action:

ALL PURCHASERS OF THE COMMON STOCK OF JUNO THERAPEUTICS, INC., DURING THE PERIOD FROM JUNE 4, 2016 AND NOVEMBER 22, 2016, BOTH DATES INCLUSIVE (THE “CLASS PERIOD”).

Excluded from the Class are: **defendants, present or former officers and directors of Juno Therapeutics, Inc., members of their immediate families and their legal representatives, heirs, successors or assigns, and any entity in which any current or former Defendants have or had a controlling interest.**

The Court hereby establishes the following program and schedule for notice to the Class of the pending class action:

1. The Court approves the forms of individual Notice of Pendency of Class Action and published Summary Notice, attached hereto as Exhibits A and B, respectively;
2. Class Counsel shall cause to be mailed, by first class mail, the individual Notice

1 of Pendency of Class Action to all members who can be identified through reasonable effort;

2 3. Class Counsel may employ A.B. Data, Ltd. as Notice Administrator, to assist in
3 the providing of class notice;

4 4. Class Counsel shall cause the published Summary Notice to be disseminated via
5 Business Wire on the tenth business day after the mailing of the individual Notice of Pendency
6 of Class Action;

7 5. Class Counsel will direct the Notice Administrator, A.B. Data, Ltd., to notify
8 Defendants' counsel of record, in writing, of the requests for exclusion it has received, including
9 the name and address of the person or entity, the number of share purchases and, if sold, the date
10 those purchased shares were sold. The Notice Administrator will transmit this information to
11 Defendants' counsel by first class mail to be postmarked no later than thirty (30) days after the
12 deadline for exclusion.

13 6. The costs of the notice shall be borne by Plaintiffs and Class Counsel and not by
14 the Defendants.

15 Dated this 22nd day of December 2017.

16 

17 RICARDO S. MARTINEZ
18 CHIEF UNITED STATES DISTRICT JUDGE
19

20
21 Presented by:

22 s/ Cliff Cantor

23 By: Cliff Cantor, WSBA # 17893
24 LAW OFFICES OF CLIFFORD A. CANTOR, P.C.
25 627 208th Ave. SE
26 Sammamish, WA 98074
27 Tel: (425) 868-7813
Fax: (425) 732-3752
email: cliff.cantor@outlook.com

1 *Plaintiffs' Liaison Counsel*

2 POMERANTZ LLP
3 Omar Jafri
4 Patrick V. Dahlstrom
5 Leigh H. Smollar
6 Ten South La Salle Street, Suite 3505
7 Chicago, Illinois 60603
8 Tel: (312) 377-1181
9 Fax: (312) 377-1184
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9 POMERANTZ LLP
10 Jeremy A. Lieberman
11 J. Alexander Hood II
12 600 Third Avenue, 20th Floor
13 New York, New York 10016
14 Tel: (212) 661-1100
15 Fax: (212) 661-8665
16 email: jalieberman@pomlaw.com
17 ahood@pomlaw.com

14 *Plaintiffs' Lead Counsel*

Exhibit A

1 THE HONORABLE RICARDO S. MARTINEZ

2 UNITED STATES DISTRICT COURT
3 WESTERN DISTRICT OF WASHINGTON
4 AT SEATTLE

5
6 In re JUNO THERAPEUTICS, INC.

Case No. C16-1069 RSM

7
8 **NOTICE OF PENDENCY OF CLASS ACTION**

9 **PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS**
10 **MAY BE AFFECTED BY PROCEEDINGS IN THIS ACTION.**

11 **TO: ALL PURCHASERS OF THE COMMON STOCK OF JUNO THERAPEUTICS,**
12 **INC., DURING THE PERIOD FROM JUNE 4, 2016 AND NOVEMBER 22, 2016,**
13 **BOTH DATES INCLUSIVE (THE “CLASS PERIOD”).**

14 **Excluded from the Class are defendants, present or former officers and directors of Juno**
15 **Therapeutics, Inc., members of their immediate families and their legal representatives,**
16 **heirs, successors or assigns, and any entity in which any current or former Defendant has or**
17 **had a controlling interest.**

18 **PLEASE NOTE: THIS CASE HAS NOT BEEN SETTLED. THIS NOTICE IS INTENDED**
19 **ONLY TO INFORM YOU THAT A CLASS ACTION IS CURRENTLY IN PROGRESS.**
20 **THERE IS NO CLAIM FORM TO BE MAILED.**

21 This Notice is issued pursuant to Rule 23 of the Federal Rules of Civil Procedure and an
22 Order of the United States District Court for the Western District of Washington (the “Court”),
23 entered October 24, 2017, certifying the above action as a Class Action. The purpose of this Notice
24 is to inform you of: (a) the pendency of the captioned class action before the Honorable Ricardo
25 S. Martinez, in the United States District Court for the Western District of Washington (the
26 “Action”); (b) the certification of the Class defined above, of which you may be a member (“Class
27 Member”); and (c) your right to exclude yourself from (or “opt out” of) the Class. This Action
has not been settled and continues to be litigated. Accordingly, there is no claim form to submit
at this time.

If you purchased shares of Juno Therapeutics Inc. common stock during the period June 4,
2016 through November 22, 2016, both dates inclusive, you may be a member of the Class. As a
Class Member, you will be bound by the result of any trial of the Action, any judgment entered by

1 the Court, and any determination made by the Court, unless you timely mail a request for exclusion,
2 as described below, postmarked no later than March 19, 2018.

3 **DESCRIPTION OF THE ACTION**

4 **Summary of the Action**

5 The Class Representatives in this action are Gilbert Hoang Nguyen and Susan Tan. The
6 Court has appointed them to represent the Class.

7 The Defendants in this action are Juno Therapeutics, Inc. (“Juno” or the “Company”) and
8 certain of Juno’s officers and directors: Hans E. Bishop, Steven D. Harr, and Mark J. Gilbert,
(the “Individual Defendants” and collectively with Juno, the “Defendants”).

9 The Amended Complaint (“Complaint”) alleges that, during the Class Period, Defendants
10 made false and/or misleading statements and/or failed to disclose material facts about JCAR015,
11 an immunotherapy candidate developed by the Company to treat a rare form of blood cancer
12 known as Acute Lymphoblastic Leukemia. During the Class Period, and pursuant to Food and
13 Drug Administration (“FDA”) regulations, JCAR015 was being studied in various clinical trials
to assess its efficacy and safety, so that the FDA could determine whether to approve the therapy
for use in the United States.

14 Specifically, the Complaint alleges that Defendants did not timely disclose a patient death
15 that occurred in May 2016 in the JCAR015 Phase II clinical trial, simultaneously reported positive,
16 preliminary results from the Phase I trial and represented to investors that the results from the
17 Phase I trial could be used as a potential measure of JCAR015’s success. The Complaint alleges
18 that on July 7, 2016, Defendants disclosed that two additional patients in the Phase II trial had died
from cerebral edema and that the FDA had placed the trial on a clinical hold. The Complaint
alleges that on this news, Juno’s stock price declined by more than 30%.

19 The Complaint alleges that Defendants misled investors by stating that the use of
20 fludarabine (“flu”) in combination with JCAR015 was the most likely cause of the patient deaths,
21 but withheld material information that undermined this conclusion. On July 12, 2016, the
22 Company announced that the FDA had lifted the clinical hold after the Company represented that
it would no longer use flu as part of the preconditioning regimen. On this news, the Complaint
alleges that Juno’s stock price rose by 9.4%.

23 The Complaint alleges that on November 23, 2016, Defendants disclosed that the Company
24 had voluntarily placed the JCAR015 Phase II trial on hold because two additional patients died
25 from cerebral edema despite the removal of flu as part of the overall treatment regimen. On this
26 news, the Complaint alleges that Juno’s stock price declined by 25%. Plaintiffs also allege that
certain Individual Defendants traded Company stock during the period of the alleged inflation.

27 The Defendants have denied and continue to deny all claims and wrongdoing asserted in

1 the Complaint and any liability arising out of the allegations of misconduct in the Complaint.

2 No trial has yet occurred in this Action and no findings of fault or liability have been made
3 as to any of the parties.

4 **Prosecution of the Action**

5 This action was commenced on July 12, 2016. On October 19, 2016, the Court appointed
6 Gilbert Hoang Nguyen as Lead Plaintiff. Lead Plaintiff filed an Amended Complaint on December
7 12, 2016. In response, Defendants moved to dismiss Lead Plaintiff's claims. The Court denied
8 Defendants' Motion to Dismiss on June 14, 2017.

9 On July 21, 2017, Defendants filed their Answer to the Amended Complaint, denying all
10 claims and wrongdoing asserted, as well as any liability arising out of the conduct alleged in the
11 Amended Complaint. The Defendants also asserted several affirmative defenses to the claims
12 made in the Amended Complaint.

13 By order dated October 24, 2017, the Court certified the Class, as defined above, appointed
14 Gilbert Hoang Nguyen and Susan Tan as the Class Representatives and Pomerantz LLP as Class
15 Counsel. Certification of the Class means that the action is legally recognized as a Class Action
16 pursuant to Rule 23 of the Federal Rules of Civil Procedure.

17 Discovery is ongoing. The discovery cutoff in this case is March 18, 2019. The Court has
18 set the deadline for filing dispositive motions at April 16, 2019. If the Court denies any such
19 motions that may be filed, a trial is scheduled in this Action for July 15, 2019.

20 This Notice is being sent to notify you that you may be a member of the Class whose rights
21 could be affected by this Action. It is not an expression of any opinion by the Court concerning
22 the merits of the Action. There is no assurance that a judgment in favor of the Class will be granted
23 or that the Court will award the Class a monetary recovery. This Notice is intended to advise you
24 of the pendency of the Action and of your rights with respect to the Action, including the right
25 either to remain a Class Member or to exclude yourself from the Class.

26 **INSTRUCTIONS TO CLASS MEMBERS**

27 If you fit the description of a Class Member, you have a choice whether to remain a member
of the Class in this Action.

If you wish to remain a Class Member, you are not required to do anything at this time. If
you do nothing, you will remain a Class Member and will be bound by the result of any trial,
judgment, and determination of the Court, whether favorable or unfavorable to Plaintiffs. If you
choose to remain in the Class, you will not be able to pursue a lawsuit on your own with regard to
any of the issues that were or could have been decided in this Action. If you remain in the Class,
you are not personally responsible for any expenses or attorneys' fees. If there is a recovery, you

1 may be entitled to share in the proceeds, less costs, expenses, plaintiff reimbursement award and
2 attorneys' fees as the Court may allow out of any recovery.

3 There is no settlement or judgment in the case at this time. In the event of recovery, you
4 will be able to share in a recovery in this case only if you are a member of the Class—i.e., you do
5 not exclude yourself—and only if you did not sell your Juno stock prior to July 7, 2016.

6 The Class is represented by: Patrick V. Dahlstrom, Esq.
7 Leigh H Smollar, Esq.
8 Omar Jafri, Esq.
9 Pomerantz LLP
10 Ten South La Salle Street, Suite 3505
11 Chicago, Illinois 60603
12 Telephone: 312-377-1181

13 If you desire to be excluded from the Class, you must state so **in writing**. Your request for
14 exclusion must state: your desire to be excluded from the Class, the name and address of the
15 person or entity requesting exclusion, that such person or entity requests exclusion from the Class
16 in this Action, the number of Juno shares purchased and the date the Juno shares were purchased,
17 and must be signed by that person or entity requesting exclusion from the Class. Requests for
18 exclusion must be transmitted by first class mail or overnight delivery service to the following
19 address:

20 Juno Therapeutics Securities Litigation
21 ATTN: EXCLUSIONS,
22 c/o A.B. Data, Ltd.
23 P.O. Box 173001
24 Milwaukee, WI 53217

25 **To be effective, your Request for exclusion must be postmarked no later than March 19,**
26 **2018.**

27 If you wish to participate in this Action, do not request exclusion. If you exclude yourself
from the Class, you will not be bound by any judgment or decision by the Court in this Action,
but you will also not be entitled to share in the benefits of any judgment favorable to the Class or
from any Court-approved settlement on behalf of the Class. If you request exclusion, you would
be entitled to pursue any individual remedy which you may have, but only at your own expense
and through your own counsel.

Your Right to Appear

If you do not request exclusion from the Class in the manner set forth above, you may, if
you so desire, enter an appearance through an attorney of your own choice. If you wish, you may

1 also consult with your own counsel concerning your rights in this action.

2 If you do not timely request exclusion from the Class postmarked by March 19, 2018, you
3 will be considered a Class Member, and you will be bound by any judgment in this Action and
4 will not be able to pursue any individual remedy which you may have.

5 **NOTICE TO BANKS, BROKERS, AND OTHER NOMINEES**

6 If you held any Juno common stock, purchased during the Class Period as nominee for a
7 beneficial owner, then, within ten (10) days after you receive this Notice, you must either: (1)
8 provide a list of the names and addresses of such beneficial owners to the Claims Administrator,
9 preferably in an MS Excel data table setting forth: (a) title/registration, (b) street address, (c)
10 city/state/zip; on electronic mailing labels in MS Word file (label size Avery #5162), or printed
11 out on physical mailing labels; or (2) send copies of this Notice and Proof of Claim by first class
12 mail to all such beneficial owners, providing written confirmation to the Claims Administrator of
13 having done so.

14 If you choose to mail the Notice yourself, you may obtain (without cost to you) as many
15 additional copies of these documents as you will need to complete the mailing by either
16 downloading a copy from the Claims Administrator's website, or by contacting the Claims
17 Administrator at:

18 Juno Therapeutics Securities Litigation
19 c/o A.B. Data, Ltd.
20 P.O. Box 170500
21 Milwaukee, WI 53217
22 info@junotherapeuticslitigation.com
23 www.junotherapeuticslitigation.com
24 888-xxx-xxxx

25 Whether you choose to complete the mailing yourself or elect to have the mailing
26 performed for you, you may obtain reimbursement for reasonable administrative costs of
27 complying with this provision, upon submission of appropriate documentation to the Claims
Administrator.

EXAMINATION OF PAPERS AND INQUIRIES

For further information about the Action, you may contact Lead Counsel at the addresses
listed above or consult the pleadings and other papers filed in the Action at the Office of the Clerk
of the United States District Court for the Western District of Washington, 700 Stewart Street, Suite
2310, Seattle, WA 98101, during normal business hours of each business day. If you have an
account with PACER, you may consult the pleadings and other papers via Electronic Case Filing
at the website of the Western District of Washington, [https://ecf.wawd.uscourts.gov/cgi-
bin/ShowIndex.pl](https://ecf.wawd.uscourts.gov/cgi-bin/ShowIndex.pl).

1 If you have any questions concerning this case or your membership in the Class please
2 contact:

3 Juno Therapeutics Securities Litigation
4 c/o A.B. Data, Ltd.
5 P.O. Box 170500
6 Milwaukee, WI 53217
7 info@junotherapeuticslitigation.com
8 www.junotherapeuticslitigation.com
9 888-xxx-xxxx

10 **INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT, THE**
11 **CLERK'S OFFICE, THE DEFENDANTS, OR DEFENDANTS' COUNSEL.**

12 Dated: December 21, 2017

13 **By Order of the Court**
14 **United States District Court**
15 **Western District of Washington**

Exhibit B

1 THE HONORABLE RICARDO S. MARTINEZ

2 UNITED STATES DISTRICT COURT
3 WESTERN DISTRICT OF WASHINGTON
4 AT SEATTLE

5 Case No. C16-1069 RSM

6 In re JUNO THERAPEUTICS, INC.

SUMMARY NOTICE OF PENDENCY OF
CLASS ACTION

7
8 **PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOUR RIGHTS**
9 **MAY BE AFFECTED BY PROCEEDINGS IN THIS ACTION.**

10 **TO: ALL PURCHASERS OF THE COMMON STOCK OF JUNO THERAPEUTICS,**
11 **INC., DURING JUNE 4, 2016 THROUGH NOVEMBER 22, 2016, BOTH DATES**
12 **INCLUSIVE (THE “CLASS PERIOD”).**

13 **Excluded from the Class are defendants, present or former officers and directors of Juno**
14 **Therapeutics, Inc., members of their immediate families and their legal representatives,**
15 **heirs, successors or assigns, and any entity in which any current or former Defendant has or**
16 **had a controlling interest.**

17 This Notice is issued pursuant to Rule 23 of the Federal Rules of Civil Procedure and an
18 Order of the United States District Court for the Western District of Washington (the “Court”),
19 entered October 24, 2017, certifying the above action as a Class Action. This Action has not been
20 settled and continues to be litigated. You need not submit a claim form at this time.

21 If you are a member of the Class, your rights are affected by this Action and you may have
22 the right to participate in the recovery. You also have the right to exclude yourself from the Class.
23 Instructions for excluding yourself are given in a more detailed Notice of Pendency of Class
24 Action, which was mailed separately to persons and entities identified from the records of
25 Defendant Juno Therapeutics, Inc. as members of the Class. That Notice of Pendency of Class
26 Action describes the Class Action and your rights with respect thereto.

27 If you have not received the more detailed Notice by mail, please contact in writing: Juno
28 Therapeutics Securities Litigation, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217,
29 or by email to: info@junotherapeuticslitigation.com, www.junotherapeuticslitigation.com.

Inquiries other than requests for Notice may be made to Class Counsel: Omar Jafri,
Pomerantz LLP, Ten S LaSalle St, Ste 3505, Chicago IL 60603, Tel (312)-377-1181,

1 ojafri@pomlaw.com.

2 **INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT, THE**
3 **CLERK'S OFFICE, THE DEFENDANTS, OR DEFENDANTS' COUNSEL.**

4 Dated: December 21, 2017

5 **By Order of the Court**
6 **United States District Court**
7 **Western District of Washington**