

EXHIBIT 2



Summary Descriptions of Work Performed

I. MEMBERS

A. Max Gruetzmacher (2,997.30 hours):

Mr. Gruetzmacher was involved in all aspects of the case, from the beginning of discovery through final trial preparations. Mr. Gruetzmacher conducted research and assisted in the drafting of various motions, including the motions for class certification, summary judgment opposition, *Daubert* motions, numerous discovery disputes, and various other case issues. Mr. Gruetzmacher assisted with document productions and review, deposition, and expert discovery, and contributed to the analysis of key plaintiff- and defense-side evidence. Mr. Gruetzmacher also assisted with communicating with the selected notice administrator and class members. In addition, Mr. Gruetzmacher assisted with mediation preparations; attended court hearings; prepared materials for and conducted mock jury studies; and attended meetings and conferences with both defendants as well as internal / co-counsel conferences regarding litigation strategy. Mr. Gruetzmacher was also heavily involved in the settlement approval process.

B. James Hughes (25.25 hours):

Mr. Hughes was involved in the lead plaintiff motion process and in related co-counsel communications.

C. Gregg Levin (2,365.25 hours):

Mr. Levin was involved in all aspects of the litigation, from the initial evaluation of the case following the filing of the initial complaint through trial preparations. Mr. Levin conducted research and assisted in the drafting of the lead plaintiff papers, Consolidated Amended Complaint, opposition to Defendants' motion to dismiss, motion for class certification, motions *in limine*, and various other case issues. Mr. Levin also assisted with fact and expert discovery matters and had responsibility for communicating with the selected notice administrator and class members. Additionally, Mr. Levin participated in the mediation and settlement process; attended court hearings and argued on behalf of Lead Plaintiff; attended conferences with defense counsel; and participated in internal meetings (and in co-counsel conferences) regarding litigation strategy. Mr. Levin was also heavily involved in the settlement approval process.

D. Christopher Moriarty (277.50 hours):

Mr. Moriarty worked directly with lead plaintiff and class representative KBC throughout the entirety of the litigation, including (i) drafting memoranda to KBC regarding case-specific issues, including the merits of the litigation and case developments (ii) leading KBC's response to discovery requests; and (iii) preparing KBC for, and then defending, its Rule 30(b)(6) deposition.



Additionally, Mr. Moriarty analyzed damages and assisted with the lead plaintiff papers, class certification, and motions *in limine*,

E. Bill Narwold (404.50 hours):

Mr. Narwold was actively involved in developing litigation strategy and was heavily involved in the mediation sessions and settlement process. Mr. Narwold assisted with damages and loss causation expert reports and analysis and co-counsel communications. In addition, Mr. Narwold assisted with filings concerning class certification, summary judgment, and various other case issues.

F. Bill Norton (136.50 hours):

Mr. Norton was extensively involved in researching and drafting Plaintiffs' motion *in limine* concerning Nick Bilton's Vanity Fair article regarding Jack Dorsey and Twitter. In addition, Mr. Norton assisted with drafting Plaintiffs' motion for appointment as Lead Plaintiff.

G. Lance Oliver (960.75 hours):

Mr. Oliver was Lead Plaintiff's lead trial counsel, prepared materials for and conducted mock jury studies in anticipation of trial. In addition, Mr. Oliver conducted research and assisted in the drafting of various trial-related motions; assisted with expert discovery; assisted with the mediation and settlement process; attended and participated at court hearings; and attended meetings and conferences with both defendants as well as internal / co-counsel conferences regarding overall litigation strategy.

H. Meghan Oliver (1,530.15 hours):

Ms. Oliver participated in all aspects of the case, from the evaluation of the case following the filing of the initial complaint through trial preparations. Ms. Oliver conducted research and assisted in the drafting of the amended complaint, the opposition to Defendants' motion to dismiss, motion for class certification, summary judgment opposition, and various other case filings. Ms. Oliver assisted with discovery negotiations, document productions and review, third-party discovery, deposition, and expert discovery, and contributed to the analysis of key plaintiff- and defense-side evidence. Additionally, Ms. Oliver was involved with the mediation sessions, attended court hearings, prepared materials for and conducted mock jury studies; and attended meetings and conferences with both defendants as well as internal / co-counsel conferences regarding litigation strategy.



II. ASSOCIATES

A. Andrew Arnold (75.75 hours):

Mr. Arnold evaluated the case following the filing of the complaint and took a lead role in evaluating client losses, and assisted in drafting the lead plaintiff papers and analyzed the losses of competing movants. In addition, Mr. Arnold conducted legal research and drafted requests for judicial notice sur-reply and oppositions to Defendants' motions *in limine*.

B. Matthew Camm (381.00 hours):

In addition to reviewing and analyzing the Defendants and third-party productions for relevance and escalation, Mr. Camm researched liability and loss causation issues. Mr. Camm also conducted factual research and drafted memoranda regarding various deponents and case issues.

C. Elizabeth Camputaro (132.00 hours):

Ms. Camputaro oversaw the management of document discovery with respect analyzing the issues alleged in the Consolidated Amended Complaint. Ms. Camputaro also reviewed and analyzed documents concerning liability and loss causation issues, conducted factual and legal research, acted as a discovery liaison between associates, counsel, partners, and contract attorneys, and drafted memoranda and charts regarding various deponents and case issues.

D. Neli Traykova Hines (82.75 hours):

Ms. Traykova assisted with trial preparations by conducting factual and legal research and drafted a memorandum regarding trial adverse witness. Ms. Traykova was also heavily involved in the settlement approval process.

E. Annie Kouba (14.50 hours):

Ms. Kouba conducted legal research and drafted a memorandum regarding California privacy law and the Stored Communications Act.

F. Charlotte Loper (11.00 hours):

Ms. Loper conducted legal research in connection with the opposition to Defendants' motion for summary judgment.

G. Meredith Weatherby (2,102.65 hours):

Ms. Weatherby was involved in all aspects of the case, from the initial evaluation of the case following the filing of the complaint up through trial preparations. Ms. Weatherby conducted



research and assisted in the drafting of the Consolidated Amended Complaint, the opposition to Defendants' motion to dismiss, the motion for class certification, and various other case issues. In addition, Ms. Weatherby assisted with deposition and expert discovery, prepared materials for and conducted mock jury studies, and attended meetings and conferences with both defendants as well as internal / co-counsel conferences regarding litigation strategy.

H. Erin Williams (74.75 hours):

Ms. Williams assisted in researching and drafting papers in connection with the opposition to Defendants' motion to quash the subpoena to non-party journalist Nick Bilton. Additionally, Ms. Williams conducted legal research pertaining to Defendants' motion to quash briefing and provided case summaries in preparation for oral arguments.

III. SENIOR COUNSEL

A. Ann Ritter (13.25 hours):

Ms. Ritter was involved in the initial case evaluation and preparation of case information for lead counsel as well as the lead plaintiff motion process and co-counsel communications.

IV. STAFF ATTORNEYS

A. Kelly Quillin (1,472.75 hours):

Ms. Quillin oversaw the management of document discovery with respect to analyzing the issues alleged in the Consolidated Amended Complaint and oversaw the management of the eDiscovery process. Ms. Quillin contributed to the analysis of key plaintiff- and defense-side evidence and acted as a discovery liaison between associates, counsel, partners, and contract attorneys. Ms. Quillin also attended meetings and conferences regarding case strategy, both internal to Motley Rice and with co-counsel.

B. Laura Rublee (233.50 hours):

Ms. Rublee was part of the team that reviewed and analyzed the Defendants' productions for relevance and escalation. In addition, Ms. Rublee conducted factual research and drafted memoranda and charts regarding various deponents and case issues.

V. CO-COUNSEL

A. Deborah Sturman (108.00 hours):

As liaison to lead plaintiff and class representative KBC, Ms. Sturman played an important role with regard to client communications throughout the entirety of the litigation. Ms. Sturman



also worked with Motley Rice attorneys preparing KBC for its Rule 30(b)(6) deposition and assisted with other KBC-specific matters, including document discovery and the provision of regular case status updates.

VI. LAW CLERKS

A. David DeHart (34.75 hours):

Mr. DeHart conducted legal research regarding *Daubert* challenges with specific regard to experts opining on legal issues.

B. Harley McClellan (22.00 hours):

Ms. McClellan conducted legal research and drafted a memorandum regarding the use of depositions at trial for unavailable witnesses.

C. Evelyn Richards (337.75 hours):

Ms. Richards provided extensive support in connection with the preparation, editing, and filing of various case filings, motions, and pleadings, including motion documents, internal attorney memos, and the Consolidated Amended Complaint. Ms. Richards further assisted in preparing documents for submission to the mediator and providing notice to shareholders.

VII. CONTRACT ATTORNEYS

A. Todd Bruno (320.50 hours):

Mr. Bruno was part of the team that reviewed and analyzed the Defendants' productions for relevance and escalation of highly relevant and hot documents to the litigation team. In addition, Mr. Bruno conducted factual research, prepared targeted searches, and drafted witness memos in preparation for depositions.

B. Vanessa During Davis (4,450.05 hours):

In addition to reviewing and analyzing the Defendants and third-party productions for relevance and the escalation of highly relevant and hot documents to the litigation team, Ms. During conducted factual research and drafted memoranda and charts regarding various deponents and case issues. Ms. During researched liability and loss causation issues, undertook a focused review of documents concerning the Defendants' misrepresentations and omissions, including the extent to which Defendants knew of the misconduct alleged in the Consolidated Amended Complaint, and analyzed key discovery findings. Ms. During also assisted partners with preparing for depositions and trial, acted as a discovery liaison between associates, counsel, partners, and



contract attorneys. prepared materials for mock jury studies; and attended internal / co-counsel meetings and conferences pertaining to litigation strategy.

C. Ryan Fowler (990.50 hours):

In addition to reviewing and analyzing the Defendants and third-party productions for relevance and escalation of highly relevant and hot documents to the litigation team, Mr. Fowler conducted factual research and drafted memoranda and charts regarding various deponents and case issues. Mr. Fowler also researched liability and loss causation issues and undertook a focused review of documents concerning the Defendants' misconduct alleged in the Consolidated Amended Complaint.

D. Aris Hanchard (923.00 hours):

In addition to reviewing and analyzing the Defendants and third-party productions for relevance and escalation of highly relevant and hot documents to the litigation team, Ms. Hanchard conducted factual research and drafted memoranda and charts regarding various deponents and case issues. Ms. Hanchard also undertook a focused review of documents concerning the Defendants' misrepresentations and omissions.

E. Julie Jackson-Bailey (612.00 hours):

In addition to reviewing and analyzing the Defendants' productions for relevance and escalation of highly relevant and hot documents to the litigation team, Ms. Jackson-Bailey undertook a focused review of documents concerning various deponents. Ms. Jackson-Bailey also conducted other factual research and drafted memoranda regarding the Defendants and various deponents.

F. Michele Mathura (2,080.50 hours):

In addition to reviewing and analyzing the Defendants and third-party productions for relevance and escalation of highly relevant and hot documents to the litigation team, Ms. Mathura conducted factual research and drafted memoranda and charts regarding various deponents and case issues. Ms. Mathura also researched liability and loss causation issues, undertook a focused review of documents concerning the Defendants' misrepresentations and omissions, and contributed to analysis of key plaintiff- and defense-side evidence concerning the same.

G. Paul Reyes (41.60 hours):

Mr. Reyes assisted with drafting the trial master exhibit chart.



H. Candice Shaver (1,610.00 hours):

In addition to reviewing and analyzing the Defendants and third-party productions for relevance and escalation of highly relevant and hot documents to the litigation team, Ms. Shaver conducted factual research and drafted memoranda and charts regarding various deponents and case issues. Ms. Shaver also researched liability and loss causation issues, undertook a focused review of documents concerning the Defendants' misrepresentations and omissions, and contributed to analysis of key plaintiff- and defense-side evidence concerning the same.

I. Michael Sherbow (66.00 hours):

Mr. Sherbow conducted factual research regarding potential deponents and drafted memoranda regarding the same.

J. Mei Shih (157.75 hours):

Ms. Shih conducted factual research regarding the Defendants and potential deponents. In addition, Ms. Shih assisted with drafting third-party subpoenas.

VIII. DIRECTOR OF EUROPEAN INVESTOR RELATIONS

A. Bruno Rosenbaum (45.75 hours):

Mr. Rosenbaum assisted with expert discovery and with client communications.

IX. LITIGATION SPECIALIST

A. Theresa Zagnoli (28.50 hours):

Ms. Zagnoli assisted lead trial counsel with preparing for jury selection.

X. LITIGATION TECHNOLOGY SPECIALIST

A. Lisa Ashby (147.75 hours):

Ms. Ashby prepared documents for submission to the Court and collected materials for depositions. In addition, Ms. Ashby provided support and assistance to the attorneys as needed by editing documents and gathering information requested by the attorneys.



XI. PARALEGALS

A. Dominique Brown (200.85 hours):

Ms. Brown provided general clerical support to attorneys assigned to the case including downloading and organizing case materials and editing documents. Ms. Brown also assisted attorneys with subpoenas and with trial preparations.

B. Megan Hickey (12.75 hours):

Ms. Hickey provided paralegal support to attorneys by reviewing and editing documents.

C. Lora McLaughlin (29.00 hours):

Ms. McLaughlin assisted attorneys with case starting activities and monitored case filings to update the case status chart and calendar. Ms. McLaughlin was also heavily involved in the settlement approval process.

D. Katherine Weil (194.00 hours):

Ms. Weil provided general clerical support to attorneys assigned to the case including downloading and organizing case filings and preparing pro hac vice applications. Ms. Weil also assisted attorneys with expert discovery and with trial preparations.

E. Arden Wilson (10.50 hours):

Ms. Wilson assisted attorneys with the lead plaintiff papers.

F. Adrianna Vladika (14.50 hours):

Ms. Vladika assisted attorneys with preparing for an expert's deposition and trial.

XII. RESEARCH ASSISTANT

A. Anna Clark (132.75 hours):

Ms. Clark assisted with preparing for trial and jury selection.