

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re ZOOM SECURITIES LITIGATION)	Case No. 3:20-cv-02353-JD
)	
This Document Relates To:)	DECLARATION OF ADAM Y. ALI
)	
ALL ACTIONS.)	
)	DATE: October 9, 2025
)	TIME: 10:00 a.m.
)	JUDGE: Honorable James Donato
)	CTRM: 11, 19th Floor

1 I, Adam Y. Ali, respectfully submit this Declaration in support of final approval of the
2 proposed settlement of this action (the "Settlement"). I have personal knowledge of the facts stated
3 herein and, if called upon as a witness, I could and would competently testify thereto.¹

4 1. In November 2020, I was appointed by this Court to serve as Lead Plaintiff ("Lead
5 Plaintiff") in the above action (the "Litigation") against Zoom Video Communications, Inc.
6 ("Zoom") and several of its senior insiders.

7 **My Background**

8 2. I am the founder and Chief Executive Officer ("CEO") of UncommonAgency.co
9 ("UncommonAgency"), an e-Commerce and marketing agency that launches and grows direct-to-
10 consumer and business-to-business brands.² In 2015, I founded UncommonAgency out of my
11 apartment with \$500 of capital and grew the company to be a multi-million dollar business that
12 employs approximately 50+ people. UncommonAgency delivers website re-platform/redesigns,
13 website maintenance, and digital marketing services to a wide array of clientele in a variety of
14 industries, including fashion & apparel, beauty & wellness, food & beverage, and home goods.

15 3. The investment I made in Zoom was substantial, and it was the result of years of
16 hard work and dedication to invest in companies that uphold ethical standards in their product or
17 service claims.

18 4. Prior to seeking to be appointed Lead Plaintiff, I conducted my own investigation
19 into the facts and circumstances giving rise to this Litigation, which included uncovering Zoom's
20 initial claim of complete encryption on their platform, which was later found to be inaccurate. I
21 also began the process of exploring legal avenues to recover my lost funds, reaching out to various
22 law firms to determine the most suitable candidate to lead this Litigation. I dedicated
23 approximately 20-30 hours to independent research and the careful selection of the right legal
24 team, all with the aim of ensuring that every investor who suffered losses had the strongest possible
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26 ¹ A Notice of Official Name Change confirming my official name change from Adam Mehmood
27 Butt to Adam Younas Ali was previously filed with the Court. ECF 129.

28 ² UncommonAgency.co was formerly known as Noticed.com.

1 chance of reclaiming their investments. As part of my diligence prior to seeking to be appointed
2 Lead Plaintiff, I reviewed the allegations in the case, interviewed a number of law firms, including
3 Robbins Geller Rudman & Dowd LLP (“Robbins Geller” or “Lead Counsel”), concerning
4 representing me and the proposed class in this Litigation. I was assisted in that vetting process by
5 UncommonAgency’s outside corporate counsel. I ultimately decided to retain Robbins Geller
6 based on its expertise, reputation, and strong track record.

7 **Serving as Lead Plaintiff**

8 5. In seeking to be appointed Lead Plaintiff, I was aware of and understood the
9 requirements and responsibilities of serving as a representative plaintiff pursuant to the Private
10 Securities Litigation Reform Act of 1995. A representative from Robbins Geller also informed
11 me that in the event of a successful lawsuit outcome, I would be able to request compensation for
12 the time and effort I dedicated to the case as part of the settlement.

13 6. Since being appointed Lead Plaintiff, I have remained actively involved in all
14 material aspects of the prosecution of the case. Specifically, I have managed and overseen the
15 prosecution of this case in a manner designed to maximize the net recovery for class members,
16 including negotiating an attorneys’ fee provision with Robbins Geller that is substantially below
17 the benchmark in this Circuit and highly favorable to the proposed class.

18 7. I regularly communicated with Robbins Geller concerning key issues and events in
19 the case and received status reports from Lead Counsel on case developments. My review of
20 filings and orders in this matter included the Motion for Reconsideration of the Order Appointing
21 Lead Plaintiff and Approving Lead Counsel and the Opposition thereto, the Consolidated Class
22 Action Complaint, Defendants’ Motion to Dismiss the Consolidated Class Action Complaint and
23 the Opposition thereto, the Order on the Motion to Dismiss and Defendants’ Motion for Partial
24 Reconsideration of Motion to Dismiss Order and the Opposition thereto.

25 8. I participated in the discovery process by searching for documents and responding
26 to document requests.

27 9. Notwithstanding Robbins Geller’s substantial expertise in prosecuting class action
28 cases of this type, I did not simply delegate the settlement negotiations to them. Rather, I oversaw

1 the settlement negotiations, actively engaged with Robbins Geller concerning the strengths and
2 weaknesses of the claims and directed the overall settlement strategy. With the assistance of Lead
3 Counsel, I fully evaluated the risks of continuing to prosecute the Litigation, including the
4 possibility of a nominal recovery or no recovery at all and the delay and cost of continuing the
5 Litigation through trial and post-trial appeals, before making a final decision to accept the
6 mediator's proposal to settle this Litigation for \$150 million.

7 10. I believe the proposed settlement is fair, reasonable, and adequately represents an
8 excellent recovery and is in the best interests of class members.

9 **Fee and Expense Award**

10 11. While I recognize that the ultimate determination of attorneys' fees is left to the
11 Court, I believe Lead Counsel's request for 18.75% of the Settlement Fund is fair, reasonable and
12 appropriate. My views are informed by several factors, including the outsized recovery we
13 achieved here for the class and my first hand observation of the quality of the work Lead Counsel
14 performed on behalf of the class. The \$150 million recovered here would not have been possible
15 without Lead Counsel's diligent and aggressive prosecution of this case.

16 12. I further believe that the Litigation expenses of not more than \$400,000.00 being
17 requested by Lead Counsel reflects costs and expenses that were reasonable and necessary for the
18 prosecution and resolution of the action.

19 13. I have devoted substantial time to the representation of the class in this case. Each
20 of the hours I dedicated to the Litigation was necessary to obtain the result achieved here and was
21 time not expended in furtherance of UncommonAgency's operations. Although I expended more
22 than 85 hours overseeing the Litigation since November 2020, I seek payment for only 75 hours
23 of time expended representing the class, which included investigating the merits of the action;
24 researching and interviewing potential lead counsel; reviewing pleadings, motions, legal
25 memoranda, orders, discovery responses and other relevant documents; corresponding with Lead
26 Counsel regarding case strategy and oversight; responding to document requests; participating in
27 settlement negotiations; and obtaining status updates from Lead Counsel. Accordingly, I seek
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1 reimbursement totaling \$48,750, at \$650 per hour, calculated based upon my annual compensation
2 as CEO of UncommonAgency divided by 2,000 hours/year.

3 14. I respectfully request that the Court grant final approval of the Settlement and
4 approve Lead Counsel's attorneys' fees and expenses application and payment of \$48,750 based
5 on a discounted hourly rate for the time I expended actively representing the class in this action.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct and that this Declaration was executed on July 12th, 2025, at
8 Dubai, UAE.

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10 *Adam Ali*

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ADAM Y. ALI
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