

LEVI & KORSINSKY, LLP

Adam M. Apton (SBN 316506)
1160 Battery Street East, Suite 100
San Francisco, CA 94111
Tel: (415) 373-1671
Email: aapton@zlk.com

*Attorneys for Movants Robbie Dickson
and Joseph M. Stacy, Jr.*

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

REZA DABESTANI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GERON CORPORATION, JOHN A.
SCARLETT, ANDREW J. GRETHLEIN,
MICHELLE J. ROBERTSON, FAYE
FELLER, ANIL KAPUR, and JAMES
ZIEGLER,

Defendants.

Case No.: 3:25-cv-02507-CRB

**~~[PROPOSED]~~ ORDER GRANTING
MOTION OF ROBBIE DICKSON AND
JOSEPH M. STACY, JR. FOR: (1)
CONSOLIDATION OF THE ACTIONS;
(2) APPOINTMENT AS CO-LEAD
PLAINTIFFS; AND (3) APPROVAL OF
SELECTION OF COUNSEL**

Date: June 20, 2025

Time: 10:00 a.m.

Courtroom: 6-17th Floor

Judge: Hon. Charles R. Breyer

ISAAC POTVIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GERON CORPORATION, JOHN A.
SCARLETT, ANDREW J. GRETHLEIN,
MICHELLE J. ROBERTSON, FAYE
FELLER, ANIL KAPUR, and JIM
ZIEGLER,

Defendants.

Case No.: 3:25-cv-02563-CRB

**~~[PROPOSED]~~ ORDER GRANTING MOTION OF ROBBIE DICKSON AND JOSEPH M. STACY, JR. FOR: (1)
CONSOLIDATION OF THE ACTIONS; (2) APPOINTMENT AS CO-LEAD PLAINTIFFS; AND (3) APPROVAL
OF SELECTION OF COUNSEL**

Having considered the papers filed in support of the Motion of Robbie Dickson and Joseph M. Stacy, Jr. (“Movants”) for: (1) Consolidation of the Actions; (2) Appointment as Co-Lead Plaintiffs; and (3) Approval of Lead Counsel pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), and for good cause shown, the Court hereby enters the following Order:

I. CONSOLIDATION OF RELATED ACTIONS

1. The above-captioned securities fraud class actions pending in this Judicial District are hereby consolidated for all purposes pursuant to Rule 42(a) of the Federal Rules of Civil Procedure. Any actions that have been filed, or may be filed, which are related and which may be considered herewith, are consolidated under Case No. 3:25-cv-02507-CRB (the “Consolidated Action”).

2. A Master File is hereby established for the consolidated proceedings in the Consolidated Action. The docket number for the Master File shall be Master File No. 3:25-cv-02507-CRB. The original of this Order shall be filed by the Clerk in the Master File. The Clerk shall mail a copy of this Order to counsel of record in each of the above-captioned actions.

3. Every pleading filed in the Consolidated Action shall bear the following caption:

IN RE GERON CORPORATION SECURITIES LITIGATION
--

Master File No. 3:25-cv-02507-CRB

II. APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL

4. Movants have moved this Court to be appointed as Co-Lead Plaintiffs in the Consolidated Action and to approve the counsel they retained to be Lead Counsel.

5. Having considered the provisions of Section 21D(a)(3)(B) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B), the Court hereby determines that Movants are the most adequate plaintiffs and satisfy the requirements of the PSLRA. The Court hereby appoints Movants as Co-Lead Plaintiffs to represent the interests of the Class.

6. Pursuant to Section 21D(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(v), Movants have selected and retained the law firm Levi & Korsinsky, LLP (“L&K”) to serve as Lead Counsel. The Court approves Movants’ selection of Lead Counsel for the Consolidated Action.

7. Lead Counsel shall have the following responsibilities and duties, to be carried out either personally or through counsel whom Lead Counsel shall designate:

- a. to coordinate the briefing and argument of any and all motions;
- b. to coordinate the conduct of any and all discovery proceedings;
- c. to coordinate the examination of any and all witnesses in depositions;
- d. to coordinate the selection of counsel to act as spokesperson at all pretrial conferences;
- e. to call meetings of the plaintiff's counsel as they deem necessary and appropriate from time to time;
- f. to coordinate all settlement negotiations with counsel for defendants;
- g. to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter, and to delegate work responsibilities to selected counsel as may be required;
- h. to coordinate the preparation and filings of all pleadings; and
- i. to supervise all other matters concerning the prosecution or resolution of the claims asserted in the action.

8. No motion, discovery request, or other pretrial proceedings shall be initiated or filed by any plaintiffs without the approval of Lead Counsel, so as to prevent duplicative pleadings or discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of the Lead Counsel.

9. Service upon any plaintiff of all pleadings, motions, or other papers in the action, except those specifically addressed to a plaintiff other than Lead Plaintiff, shall be completed upon service of Lead Counsel.

10. Lead Counsel shall be the contact between plaintiff's counsel and defendants' counsel, as well as the spokespersons for all plaintiff's counsel, and shall direct and coordinate the activities of plaintiff's counsel. Lead Counsel shall be the contact between the Court and plaintiff and his counsel.

III. NEWLY FILED OR TRANSFERRED ACTIONS

11. When a case that arises out of the subject matter of this action is hereinafter filed in this Court or transferred from another Court, the Clerk of this Court shall:

- a. file a copy of this Order in the separate file for such action;
- b. deliver a copy of this Order to the attorneys for the plaintiff(s) in the newly filed or transferred case and to any new defendant(s) in the newly filed or transferred case; and
- c. make the appropriate entry on the docket for this action.

12. Each new case that arises out of the subject matter of the action that is filed in this Court or transferred to this Court shall be consolidated with the Consolidated Action and this Order shall apply thereto, unless a party objecting to this Order or any provision of this Order shall, within ten (10) days after the date upon which a copy of this Order is served on counsel for such party, file an application for relief from this Order or any provision herein and this Court deems it appropriate to grant such application.

13. During the pendency of this litigation, or until further order of this Court, the parties shall take reasonable steps to preserve all documents within their possession, custody or control, including computer-generated and stored information and materials such as computerized data and electronic mail, containing information that is relevant to or which may lead to the discovery of information relevant to the subject matter of the pending litigation.

IT IS SO ORDERED.

Dated: May 29, 2025



THE HONORABLE CHARLES R. BREYER
UNITED STATES SENIOR DISTRICT JUDGE