

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHAILESH PATEL, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NAPCO SECURITY TECHNOLOGIES,
INC., RICHARD L. SOLOWAY and KEVIN
S. BUCHEL,

Defendants.

Case No.: 2:25-cv-02308-LDH-LGD

Hon. LaShann DeArcy Hall

**STIPULATION AND ~~PROPOSED~~ ORDER APPOINTING SHAILESH PATEL
AND DONNA KRAMER AS CO-LEAD PLAINTIFFS AND APPROVING LEVI &
KORSINSKY, LLP AND POMERANTZ LLP AS CO-LEAD COUNSEL**

Lead Plaintiff movants Shailesh Patel and Donna Kramer, by and through their undersigned counsel, hereby stipulate the following in resolution of their competing pending Motions to Appoint Lead Plaintiff and Lead Counsel (ECF Nos. 14, 15). As indicated below, Defendants take no position and do not object to the relief requested herein.

WHEREAS, on April 25, 2025, plaintiff Shailesh Patel commenced the above-captioned action by filing a securities class action complaint, asserting claims under the Securities Exchange Act of 1934 (“Exchange Act”), on behalf of a putative class of investors that acquired Napco Security Technologies, Inc. (“Napco”) securities;

WHEREAS, on June 24, 2025, Mr. Patel moved this Court for appointment as Lead Plaintiff and approval of his selection of Lead Counsel, claiming losses of \$2,656.56 in connection with his purchases of Napco securities under the Exchange Act. *See* ECF No. 14-5;

WHEREAS, on June 24, 2025, Donna Kramer also moved this Court for appointment as Lead Plaintiff and approval of her selection of Lead Counsel, claiming losses of \$21,996.00 in connection with her purchases of Napco securities under the Exchange Act. *See* ECF No. 15-4;

WHEREAS, the PSLRA, 15 U.S.C. §78u-4(a)(3)(B)(iii), provides, *inter alia*, that the most adequate plaintiff to serve as Lead Plaintiff is, in the determination of the Court, the “person or group of persons” that has the largest financial interest in the relief sought by the class and otherwise satisfies the relevant requirements of Rule 23 of the Federal Rules of Civil Procedure;

WHEREAS, Mr. Patel and Ms. Kramer have provided signed, sworn Certifications in support of their motions for appointment as lead plaintiff setting forth, *inter alia*, their transactions in Napco securities during the alleged class period. *See* ECF Nos. 14-4 and 15-6;

WHEREAS, 15 U.S.C. §78u-4(a)(3)(B)(v) provides that, subject to the approval of the Court, the most adequate plaintiff will select and retain counsel to represent the class, and Mr.

Patel and Ms. Kramer have, respectively, selected and retained the law firms of Levi & Korsinsky, LLP (“Levi & Korsinsky”), Pomerantz LLP (“Pomerantz”), as their proposed Lead Counsel for the putative class;

WHEREAS, after reviewing each other’s submissions to the Court, Mr. Patel and Ms. Kramer – as the only movants in contention for appointment as Lead Plaintiff – met and conferred via counsel and agreed to resolve their competing motions and, subject to the Court’s approval, to serve jointly as Co-Lead Plaintiffs and for their respective selections of counsel, the law firms of Levi & Korsinsky and Pomerantz, to serve as Co-Lead Counsel;

WHEREAS, courts have endorsed similar requests from competing lead plaintiff movants as promoting the statutory purposes of the PSLRA and permitted independent lead plaintiff movants to join together where movants “concluded that a protracted dispute concerning lead plaintiff appointment . . . [was] not in the best interests of the class and that jointly prosecuting [the] litigation would be appropriate and assist with the speedy commencement of [the] litigation.” *In re Facebook, Inc. Sec. Litig.*, No. 5:18-cv-01725-EJD (N.D. Cal. Aug. 3, 2018), **Dkt. No. 56 at 2-3** (approving stipulation of lead plaintiff movants); *accord Ragan v. Farfetch Limited, et al.*, 8:23-cv-02857-MJM (D. Md. Jan. 17, 2024), **Dkt. No. 50**; *Pizzuto v. Homology Meds., Inc.*, No. 2:22-cv-01968-FLA-JPR (C.D. Cal. July 1, 2022), **Dkt. No. 38**; *In re Grab Holdings Limited Sec. Litig.*, No. 1:22-cv-02189-VM (S.D.N.Y. June 7, 2022), **Dkt. No. 39**; *Terenzini v. GoodRx Holdings, Inc.*, No. 2:20-cv-11444-DOC (C.D. Cal. Apr. 8, 2021), **Dkt. No. 65**; *Zhou v. Faraday Future Intelligent Elec. Inc. f/k/a Prop. Sols. Acquisition Corp.*, No. 2:21-cv-09914-CAS-JC (C.D. Cal. Mar. 7, 2022), Dkt. Nos. 32-33.

WHEREAS, Defendants take no position in response to the Mr. Patel’s and Ms. Kramer’s request for appointment as Co-Lead Plaintiffs or regarding any of the factual or legal assertions in

this stipulation, but instead reserve all rights, objections and arguments concerning Mr. Patel's and Ms. Kramer's appointment as lead plaintiffs, or their adequacy and/or typicality for later in the proceedings, including, but not limited to, motions to dismiss, class certification proceedings summary judgment, trial or otherwise.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, as follows:

1. Mr. Patel's and Ms. Kramer's respective pending motions for lead plaintiff (ECF Nos. 14, 15) are hereby denied as moot;

2. Pursuant to 15 U.S.C. §78u-4(a)(3)(B) and in light of the foregoing, Mr. Patel and Ms. Kramer are appointed Co-Lead Plaintiffs for the class; and

3. Pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), Co-Lead Plaintiffs' selections of Levi & Korsinsky and Pomerantz as Co-Lead Counsel are approved.

IT IS SO STIPULATED.

[Signature blocks on following page.]

Dated: July 2, 2025

LEVI & KORSINSKY, LLP

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*Lead Counsel for Shailesh Patel and Proposed
Lead Counsel for the Class*

Dated: July 2, 2025

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Additional Counsel for Donna Kramer

IT IS SO ORDERED.

Dated: March 9, 2026

s/ **LDH**

Hon. LaShann DeArcy Hall
United States District Judge