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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

Individually and on Behalf )  
of All Others Similarly Situated, )  
  
Plaintiff, )  
  
vs. )  
  
ATYR PHARMA INC. and SANJAY S. )  
SHUKLA, )  
  
Defendants. )

Case No.:  
  
CLASS ACTION  
**COMPLAINT FOR VIOLATIONS  
OF THE FEDERAL SECURITIES  
LAWS**  
  
DEMAND FOR JURY TRIAL



1 endpoint of the EFZO-FIT trial was to show the therapy's ability to reduce a patient's  
2 steroid usage.

3 6. Throughout the Class Period, the Defendants provided investors with  
4 material information concerning the EFZO-FIT trial. This information included,  
5 among other things, statements from aTyr's Chief Executive Officer on his  
6 confidence in the forced steroid taper approach in the EFZO-FIT's study design.

7 7. Defendants provided these overwhelmingly positive statements to  
8 investors while, at the same time, disseminating false and misleading statements  
9 and/or concealing material adverse facts concerning the efficacy of Efzofitimod.  
10 Principally, Defendants misled investors on the therapy's ability to allow a patient to  
11 significantly taper steroid usage. This caused Plaintiff and other shareholders to trade  
12 aTyr's securities at artificially inflated prices.

13 8. The truth emerged on September 15, 2025, before market open, when  
14 aTyr hosted an investor call. The Company disclosed that the EFZO-FIT trial failed  
15 to meet its primary endpoint. Specifically, Efzofitimod usage at 48 weeks did not  
16 achieve the hyped steroid dose reduction and results showed only minor differences  
17 from placebo. aTyr also announced that the Company's next step was to engage with  
18 the FDA to determine a path forward, given the disappointing outcome.

19 9. Investors and analysts reacted immediately to aTyr's disclosures. aTyr's  
20 common stock price declined from a market close price of \$6.03 per share on  
21 September 12, 2025, to \$1.02 per share on September 15, 2025, an 83.2% price  
22 decline over a single trading day.

23 10. Defendants' fraudulent statements have caused investors to sustain  
24 significant damages. Accordingly, Plaintiff seeks to recover those damages by way of  
25 this securities class action.

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1 **JURISDICTION AND VENUE**

2 11. Plaintiff brings this action, on behalf of himself and other similarly  
3 situated investors, to recover losses sustained in connection with Defendants’ fraud.

4 12. The claims asserted herein arise under and pursuant to §§10(b) and 20(a)  
5 of the Exchange Act (15 U.S.C. §§ 78j(b) and 78t(a)) and Rule 10b-5 promulgated  
6 thereunder by the SEC (17 C.F.R. §240.10b-5).

7 13. This Court has jurisdiction over the subject matter of this action pursuant  
8 to 28 U.S.C. §§1331 and 1337, and Section 27 of the Exchange Act, 15 U.S.C. §78aa.

9 14. Venue is proper in this District pursuant to §27 of the Exchange Act and  
10 28 U.S.C. §1391(b), as Defendant aTyr is headquartered in this District and a  
11 significant portion of its business, actions, omissions, and the subsequent damages to  
12 Plaintiff and the Class, took place within this District.

13 15. In connection with the acts, conduct and other wrongs alleged in this  
14 Complaint, Defendants, directly or indirectly, used the means and instrumentalities of  
15 interstate commerce, including but not limited to, the United States mail, interstate  
16 telephone communications and the facilities of the national securities exchange.

17 **THE PARTIES**

18 16. Plaintiff purchased aTyr common stock at artificially inflated prices  
19 during the Class Period and was damaged upon the revelation of the Defendants’  
20 fraud. Plaintiff’s certification evidencing his transactions in aTyr is attached hereto.

21 17. aTyr Pharma, Inc. is a Delaware corporation with its principal executive  
22 offices located at 10240 Sorrento Valley Road, Suite 300, San Diego, CA 92121.  
23 During the Class Period, the Company’s common stock traded on the Nasdaq stock  
24 market (the “NASDAQ”) under the symbol “ATYR”.

25 18. Defendant Sanjay S. Shukla (“Shukla”) was, at all relevant times, the  
26 President, Chief Executive Officer, and a Director of aTyr.

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1 19. Defendant Shukla is sometimes referred to herein as the “Individual  
2 Defendant.” aTyr together with the Individual Defendant are referred to herein as the  
3 “Defendants.”

4 20. The Individual Defendant, because of his position with the Company,  
5 possessed the power and authority to control the contents of aTyr’s reports to the  
6 SEC, press releases, and presentations to securities analysts, money and portfolio  
7 managers, and institutional investors, *i.e.*, the market. The Individual Defendant was  
8 provided with copies of the Company’s reports and press releases alleged herein to be  
9 misleading prior to, or shortly after, their issuance and had the ability and opportunity  
10 to prevent their issuance or cause them to be corrected. Because of his position and  
11 access to material non-public information available to them, the Individual Defendant  
12 knew that the adverse facts specified herein had not been disclosed to, and were being  
13 concealed from, the public, and that the positive representations which were being  
14 made were then materially false and/or misleading. The Individual Defendant is liable  
15 for the false statements pleaded herein, as those statements were each “group-  
16 published” information, the result of the collective actions of the Individual  
17 Defendant.

18 21. aTyr is liable for the acts of the Individual Defendant, and its employees  
19 under the doctrine of respondeat superior and common law principles of agency as all  
20 the wrongful acts complained of herein were carried out within the scope of their  
21 employment with authorization.

22 22. The scienter of the Individual Defendant, and other employees and  
23 agents of the Company are similarly imputed to aTyr under respondeat superior and  
24 agency principles.

25 **SUBSTANTIVE ALLEGATIONS**

26 **Company Background**

27 23. aTyr describes itself as a clinical-stage biotechnology company  
28 leveraging evolutionary intelligence to develop novel therapies targeting fibrosis and

1 inflammation. The Company focuses on the biology of tRNA synthetases—so called  
2 ancient and essential proteins that, beyond their traditional roles, have evolved unique  
3 extracellular domains that influence diverse signaling pathways in humans. Through  
4 its proprietary discovery platform, aTyr explores these domains across all 20 tRNA  
5 synthetases to uncover previously hidden therapeutic targets. The Company’s lead  
6 candidate, Efzofitimid, is a biologic immunomodulator in clinical development for  
7 treating interstitial lung disease, pulmonary sarcoidosis in particular.

8         24. Prior to the start of the Class Period, aTyr conducted a Phase 1b/2a  
9 clinical trial of Efzofitimid for patients with pulmonary sarcoidosis (the “Phase 1b/2a  
10 Trial”). The main objective of the Phase 1b/2a Trial was to evaluate the safety,  
11 tolerability, immunogenicity, and pharmacokinetic profile of multiple doses of  
12 Efzofitimid compared to placebo. Secondary objectives included the potential  
13 steroid-sparing effects of Efzofitimid, in addition to other exploratory assessments of  
14 efficacy.

15         25. On October 2, 2024, aTyr issued a press release announcing the  
16 publication of a post hoc analysis of the Phase 1b/2a Trial in the *European*  
17 *Respiratory Journal*. The publication, entitled, “Therapeutic Doses of Efzofitimid  
18 Demonstrate Efficacy in Pulmonary Sarcoidosis” reported that treatment with  
19 Efzofitimid at therapeutic doses, as compared with a subtherapeutic dose or placebo,  
20 was associated with a lower rate of relapse as oral corticosteroids (“OCS”) were  
21 tapered. Time-to-first-relapse was defined as the interval from the date of the first  
22 successful OCS” taper to the date when “rescue” therapy was first required.

23         26. Defendant Shukla was quoted in the press release stating:

24                 We continue to publish data from our Phase 1b/2a study  
25                 that further demonstrate the efficacy of Efzofitimid in  
26                 pulmonary sarcoidosis patients and positions this first-in-  
27                 class immunomodulator as a promising new treatment  
28                 option that can reduce or avoid steroid-related toxicity. We  
                    believe we are on the cusp of a paradigm shift in the  
                    treatment for sarcoidosis, where patients may have the

1 opportunity to receive clinically validated therapies that can  
2 treat their underlying disease without incurring added harm.

3 27. On October 8, 2024, aTyr issued a press release announcing that  
4 Efzofitimod was being featured in the *Best of CHEST Journals* session at the CHEST  
5 2024 Annual Meeting, taking place October 6 – 9, 2024, in Boston, Massachusetts.  
6 Defendant Shukla was quoted in the press release stating:

7 We are very pleased to have Efzofitimod featured in this  
8 year’s Best of CHEST session, which speaks to the high  
9 quality of the data from the Phase 1b/2a study that was  
10 previously published in the journal. We believe the findings  
11 from this study, which showed the ability of Efzofitimod to  
12 reduce—and in some cases eliminate— steroid use in  
13 patients while controlling symptoms, are an important step  
14 forward in developing a potential new treatment for  
15 sarcoidosis.

16 28. Before the Class Period, the Company also began enrollment for a  
17 subsequent trial phase of Efzofitimod—The EFZO-FIT trial—designed as a global  
18 Phase 3 randomized, double-blind, placebo-controlled study to evaluate the efficacy  
19 and safety of Efzofitimod in patients with pulmonary sarcoidosis. The EFZO-FIT trial  
20 was designed as a 52-week study consisting of three parallel cohorts randomized  
21 equally to either 3.0 mg/kg or 5.0 mg/kg of Efzofitimod or placebo dosed  
22 intravenously once a month for a total of 12 doses. The trial would incorporate a  
23 forced steroid taper, with steroid reduction as the primary endpoint of the study.  
24 Secondary endpoints would include measures of lung function and sarcoidosis  
25 symptoms.

26 **The Defendants’ Materially False and Misleading  
27 Statements Concerning aTyr’s Phase 3 Study of Efzofitimod**

28 **The Third Quarter 2024 Financial Report**

29 29. The Class Period begins on November 7, 2024, when aTyr issued a press  
30 release announcing its third quarter 2024 financial results and providing a corporate

1 update (“3Q24 Financials Release”). The 3Q24 Financials Release disclosed that  
2 aTyr had completed enrollment for the Phase 3 EFZO-FIT study to evaluate the  
3 efficacy and safety of Efzofitimod in patients with pulmonary sarcoidosis. The  
4 Company also touted the post hoc analysis of the Phase 1b/2a Trial published in the  
5 *European Respiratory Journal*. Further, aTyr reiterated data for the Phase 1b/2a Trial  
6 study being featured in the *Best of CHEST Journals* session at the CHEST 2024  
7 Annual Meeting.

8 30. Defendant Shukla was quoted in the 3Q24 Financials Release stating:

9 *We achieved a significant milestone this quarter by*  
10 *completing enrollment in our global pivotal Phase 3*  
11 *EFZO-FIT study in pulmonary sarcoidosis and topline*  
12 *data is expected in the third quarter of 2025.* Additionally,  
13 our Efzofitimod program was featured in this year’s Best of  
14 CHEST Journals session at the CHEST 2024 annual  
15 meeting *and we recently published favorable steroid*  
16 *relapse data for Efzofitimod in the European Respiratory*  
17 *Journal*. These events have generated increased interest in  
18 Efzofitimod and the potential promise it holds to be a  
19 transformative therapy for patients.

20 (Emphasis added).

21 aTyr Announces a Third Positive DSMB  
22 Review for Efzofitimod in Phase 3 EFZO-FIT

23 31. On December 10, 2024, aTyr issued a press release announcing a third  
24 positive DSMB review for Efzofitimod in the Phase 3 EFZO-FIT study (the “DSMB  
25 Review Release”). The DSMB Review Release reported that the DSMB had  
26 reviewed all 268 patients enrolled in the study and recommended its continuation  
27 without modification.

28 32. Defendant Shukla was quoted in the DSMB Review Release stating:

We are pleased to report yet another positive safety review  
for Efzofitimod, that have been enrolled in which includes  
all 268 patients our global pivotal Phase 3 EFZO-FIT™  
study. *Safety is paramount when looking to provide a*

1 *disease modifying treatment for a chronic condition such*  
2 *as pulmonary sarcoidosis, where reducing or replacing a*  
3 *toxic standard of care such as oral corticosteroids could*  
4 *be highly meaningful and improve quality of life for*  
5 *patients.*

6 aTyr's Presentation at the 43rd Annual J.P. Morgan Healthcare Conference

7 33. On January 16, 2025, aTyr provided a presentation at the 43<sup>rd</sup> Annual  
8 J.P. Morgan Healthcare Conference. As part of the event, Defendant Shukla gave an  
9 update on the Phase 3 EFZO-FIT study, stating in relevant part:

10 *aTyr is a company that has a real major Phase 3 catalyst*  
11 *later this year in Q3.* And much of the presentation is going  
12 to center around the opportunity in interstitial lung disease  
13 with our therapy Efzofitimid. And it has been a journey to  
14 advance what we think is a paradigm shifting therapy in a  
15 multibillion-dollar space. So, we're carving out really new  
16 territory here, and we're the leading interstitial lung disease  
17 company in the world with one of the only programs to ever  
18 even make it to Phase 3 in these indications.

19 \* \* \*

20 Efzofitimid is our lead asset in Phase 3. It's a first-in-class  
21 biologic with an approach to interstitial lung disease that is  
22 generating fantastic results thus far. And we'll talk to you  
23 about some of that data and why we feel that way. And how  
24 we're addressing interstitial lung disease with Efzofitimid.

25 \* \* \*

26 *And I'm sure you've heard a lot of companies over the last*  
27 *several days talk[] about dose response. We not only saw*  
28 *dose response, but we saw it in all of those end points we*  
*measured. So, it gives us a lot of confidence moving here*  
*into Phase 3.*

*Last thing, no known safety issues. We are replacing toxic*  
*therapy. So, patients deserve something that is not going*  
*to create a new burden of toxicity. This modality offers*  
*that opportunity.* And it's why patients who are currently

1 finishing our trial are demanding to remain in our trial right  
2 now, even though they're blinded and we are blinded to  
3 what they're receiving -- *the respite from some of the toxic*  
4 *therapies that they've been receiving for some time, five or*  
5 *10 years, in this trial has been something that they want*  
6 *more of.*

7 \* \* \*

8 So Efzofitimid is positioned as a frontline steroid-sparing  
9 and/or reducing agent. *We are seeing quite remarkable*  
10 *steroid-sparing effects in our blinded reviews.* But the idea  
11 here is, can we reduce at a minimum, reduce or maybe even  
12 eliminate steroids. And let's avoid some of those toxic  
13 effects. And let's also then avoid getting to those third-line  
14 agents, which don't work well either and also come with  
15 their own toxic baggage. So upwards of 75 percent of the  
16 patients, we think here could be targeted with Efzofitimid.

17 \* \* \*

18 *Our global Phase 3 design is fully enrolled, a good timing*  
19 *for all of you. We're finished with enrollment, and now*  
20 *we're just waiting for data. This was now a well-powered*  
21 *and highly powered designed trial, 88 patients per arm.*  
22 *We took the two efficacious doses in Phase 2 forward. We*  
23 *finally enrolled 268 patients.*

24 *Some key things here. In the last trial, we noticed we*  
25 *could knockdown steroids pretty well down to five*  
26 *milligrams, but we're leaning into that signal a little bit*  
27 *more in this trial, and we're attempting to taper people to*  
28 *0. And we're already seeing benefit in many of the*  
*patients, as I mentioned, who have finished the trial.*  
*We're now refusing to go back on steroids.*

So, we've had to step up with an expanded access program  
rather quickly here, working with certain regions that allow  
it. But this is a patient -- this is a trial where we'll look to  
taper down from an entry dose of 7.5 to 2.5 and then  
observe patients from week 12 to week 48. *What we expect*  
*to see in the placebo population is flaring exacerbation,*  
*and you'll see that prednisone dose jumps back up.*

1           *We think using our drug, we can keep patients at low or*  
2           *no dose. But that's really what we're trying to basically see*  
3           *with our statistical delta. I'm trying to see a difference in*  
4           *that average daily prednisone dose.* And even if we could  
5           peel away one or two milligrams, agencies look at that as  
6           important.

7           Why? Because it's a cumulative reduction of that burden,  
8           10, 15, 20 less milligrams of prednisone a week, 80, 100  
9           less a month, that adds up to positive benefit for these  
10          patients with their quality of life. If we can do that and  
11          maintain that immune balance, I think we have something  
12          really special here.

13          (Emphasis added).

14          34. During the same conference, the Individual Defendant answered  
15          questions from analysts. Defendant Shukla had the following relevant exchange with  
16          an attendee who asked about the Phase 3 EFZO-FIT study design:

17                **<Q: Unidentified Attendee>** As it relates to the Phase 3,  
18                can you explain the steroid taper protocol? How is it similar  
19                or different to the Phase 2? And how are you thinking about  
20                minimizing the [principal investigator (“PI”)] discretion and  
21                subjectivity?

22                **<A: Defendant Shukla>** Yes, it's a great question because  
23                with some of those approved therapies that are out there,  
24                there was a lot of contentious debate because there's  
25                investigator subjective judgment. And one of the things we  
26                work with the agency is, let's have a validated tool that  
27                guides taper decisions. And perhaps they even learned from  
28                the TAVNEOS approval.

              So, we have a tool we use the [Patient Global Assessment  
              (“PGA”)]. It's a validated instrument that every two weeks,  
              we're assaying these patients, how are you doing? How  
              have your last two weeks been? And if there's any  
              worsening on that PGA, even a one-point worsening, there's  
              an automatic edit check that goes out from drug—from data  
              management even saying we should see a steroid increase.

1  
2 So, patients are asked to follow their prednisone dose every  
3 day in their trial. If there's a worsening in PGA every two  
4 weeks, it's being assayed, and that guides some of that  
5 judgment. So, we're taking a little bit of the keys away of  
6 the car from the pulmonologists here because we want to  
7 have that titration based on the PGA.

8 ***How is it different? One of the key differences, as I***  
9 ***mentioned, we knocked everyone down to five milligrams***  
10 ***and then look to see if they flare in the last trial. This trial***  
11 ***we're knocking folks down to zero. So, what we expect is***  
12 ***more unmasking of disease in placebo, more steroid***  
13 ***rescue there. That could then serve as how I said with the***  
14 ***area into the curve, a delta emerge. So those are some of***  
15 ***the key differences on how we're minimizing some of that***  
16 ***investigator bias, but also potentially seeing a greater***  
17 ***signal of steroids bearing with EFZO.***

18 (Emphasis added).

19  
20 35. On March 13, 2025, aTyr issued a press release announcing its fourth  
21 quarter and full year 2024 financial results and providing a corporate update. On the  
22 same day, the Company hosted an analyst conference call to discuss its results.  
23 During the call, Defendant Shukla provided an update on the Phase 3 EFZO-FIT  
24 study, stating in relevant part:

25 2024 was an important year for aTyr as we completed  
26 enrollment in our global pivotal Phase 3 EFZO-FIT study of  
27 Efzofitimid in patients with pulmonary sarcoidosis in major  
28 form of ILD, which is our lead indication. This is the largest  
interventional study ever conducted in pulmonary  
sarcoidosis, and we look forward to releasing top-line data  
from this study in the third quarter of this year.

EFZO-FIT is a randomized, double-blind, placebo-  
controlled 52-week study. It consists of three parallel  
cohorts, randomized equally to either three milligrams per  
kilogram or five milligrams per kilogram of Efzofitimid or

1 placebo, dosed intravenously monthly for a total of 12  
2 doses.

3 ***The study enrolled 268 patients at 85 centers in nine***  
4 ***countries. The trial design incorporates a forced steroid***  
5 ***taper with steroid reduction as the primary endpoint of the***  
6 ***study.***

7 Secondary endpoints include measures of sarcoidosis  
8 quality of life and lung function. Patients who complete the  
9 study and wish to receive treatment with Efzofitimod  
10 outside of the clinical trial are eligible to participate in an  
11 individual patient expanded access program, or EAP.

12 The EAP was implemented primarily based on feedback  
13 from multiple study principal investigators or PIs whose  
14 patients requested to continue treatment once they had  
15 completed the study. These patients will receive five  
16 milligrams per kilogram of Efzofitimod while in the EAP.

17 ***However, PIs, patients, and the company remain blinded***  
18 ***to the EFZO-FIT treatment assignments of these EAP***  
19 ***patients. Additionally, we have now held four positive***  
20 ***Data and Safety Monitoring Board or DSMB reviews for***  
21 ***this study, all of which have identified no safety concerns***  
22 ***and recommended that the study continue unmodified.***

23 The most recent preplanned independent review indicates  
24 that the study continues to track well from a safety  
25 standpoint. We remain confident in the favorable safety  
26 profile we have seen for Efzofitimod to date, which we  
27 believe is the key value proposition of the drug.

28 ***Finally, we'll get our first look at the blinded baseline***  
***demographic and disease characteristics of the patients***  
***enrolled in the study at the upcoming American Thoracic***  
***Society Conference, or ATS, which is scheduled to take***  
***place mid-May in San Francisco.***

***In a poster, we will be able to get a sense of the profile of***  
***the patients enrolled, including baseline steroid dose and***

1 *background immunomodulator use and how the profile*  
2 *matches the inclusion and exclusion criteria for the study.*

3 *As part of our planning for the Phase 3 readout for*  
4 *EFZO-FIT, we recently held a Type C meeting with the*  
5 *US Food and Drug Administration or FDA. The main*  
6 *objective of this meeting was to discuss the statistical*  
7 *analysis plan, or SAP, for the study, including how the*  
8 *primary and secondary endpoints are assessed statistically.*

9 *For the primary endpoint, we determined how steroid*  
10 *reduction will be analyzed in the SAP.*

11 *As we previously discussed, we initially proposed that we*  
12 *measure steroid reduction based on calculating the*  
13 *average daily steroid dose between week 12 and week 48,*  
14 *which is the protocol-specified post-steroid taper period.*

15 *We viewed this as a conservative way of measuring steroid*  
16 *reduction in the study. Based on FDA feedback, we will*  
17 *now measure steroid reduction as the absolute change*  
18 *from baseline to week 48.*

19 We feel this change creates a more simplified assessment to  
20 capture the potential steroid delta between groups. The  
21 statistical powering for the study remains intact, and we are  
22 pleased with the clarification around how we will measure  
23 steroid reduction.

24 With limited clinical studies in sarcoidosis as a benchmark,  
25 we are pioneering a path forward to measure how we can  
26 potentially improve the lives of these patients.

27 (Emphasis added.)

28 36. During the same call, the Defendants held a question-and-answer session  
with financial analysts. Defendant Shukla had the following relevant exchanges with  
analysts inquiring about the Phase 3 EFZO-FIT study enrollment and design:

**<Q: Derek Christian Archila, Wells Fargo Securities> I  
know you highlighted in the prepared comments that there**

1 was investigator and patient enthusiasm for the EAP. So, I  
2 just wanted to ask if you have any idea in terms of the  
3 percentage of the patients who are in the trial rolling over  
4 into the expanded access or a new program there.

5 **<A: Defendant Shukla>** Yes, it's a common question I get:  
6 how many patients? What's the percent? And I want to start  
7 by saying we have seen continued interest, growing interest.  
8 But the issue really here is that not all countries and not all  
9 centers can participate based on their local regulatory  
10 requirements. I've said this before: countries like Japan, for  
11 example, do not have a pathway to participate in an EAP-  
12 type program.

13 So, you'd have to subtract out all of those regions that aren't  
14 involved and then try to come up with a crude measure of  
15 response, which is what I think a lot of investors want to do  
16 here.

17 What I can say is that the interest is still very robust. I was  
18 just with about 30 experts recently this past weekend. There  
19 continues to be more and more interest in participating in  
20 the EAP.

21 We have committed to helping patients who are performing  
22 well in the trial to roll into the EAP, but it's an individual  
23 site-by-site decision because, of course, we are not in a  
24 formal open-label type extension. So very pleased with the  
25 progress. I think it's a great signal, a great interim  
26 biomarker, if you will. And we're going to continue to  
27 support those patients to move into that EAP. But again, to  
28 get into specific numbers and try to get into the math, it's  
probably not helpful.

*And just as a reminder, we are blinded. We're blinded to  
what these patients are on during the trial. So, there's  
always a chance that all of these patients are on placebo  
and that they have been able to taper more or less off their  
steroids and it doesn't have anything to do with the drug.*

*So, people know me to be rather conservative in my  
messaging. I just think it's a great signal to see that*

1 *patients who are finishing a trial want to remain in the*  
2 *trial. That, to me, as a former clinician, speaks very*  
3 *powerful to what something is happening during the trial.*

4 \*\*\*

5 <Q: Yasmeeen Rahimi, Piper Sandler> Congrats on all the  
6 exciting progress and an exciting year ahead of us. I got two  
7 quick questions. One is around managing patients with  
8 steroid reduction that led to engaging with the agency to  
9 make this change from a sort of clinical perspective.

10 Just maybe if you could kind of shed light on how that  
11 meeting came about and why the change makes absolute  
12 sense, but maybe the question would be why implement it  
13 now and the rationale behind it? That's sort of question one.

14 And question two, it's really exciting to see the baseline  
15 demographics from the study here upcoming at ATS. Could  
16 you maybe help us understand what we should be looking  
17 for? Obviously, it's a tremendous study with globally, lots  
18 of work that went into it. So just kind of help us framework  
19 on what are some of the measures that we should be looking  
20 closely to in terms of this patient population. And I'll jump  
21 back in the queue.

22 <A: Defendant Shukla> Great questions. I will take the  
23 first one and say that the market research is not necessarily  
24 really connected to this type of meeting. This is a little  
25 inside baseball biostatistics but typically before you lock  
26 your database, you have all the rules set up with the Biostats  
27 division.

28 *And as a former biostatistician, it's important that we*  
*really agree to all the pre-hoc analysis. I think far too*  
*many times in biotech, we implement rules, and then after*  
*data comes out, we start to do post-hoc analysis and*  
*cherry-pick and cut and slice the data. And I wish more*  
*biopharmas wouldn't do that.*

*So we're very rigorous, and I like to be very rigorous*  
*around, hey, let's get everything pre-hoc organized down*

1 *to the details exactly how do you want us to program and*  
2 *even look at some of this steroid reduction.*

3 But we have proposed something that I viewed as a fairly  
4 conservative way of looking at steroids and the average  
5 daily steroid dose upon interacting with the FDA here.  
6 Their view was this approach would be fine, the suggested  
7 approach where we're looking at just a simplified change  
8 from baseline.

9 I'm not going to disagree with that. I'm going to go ahead  
10 and implement that approach because, as I said, I think this  
11 actually allows us to potentially maximize a signal at the  
12 end of the trial.

13 *Remember, there's a forced steroid taper component.*  
14 *Placebo patients will get the benefit of that reduction of*  
15 *the forced steroid taper. But now looking at the end of the*  
16 *trial, the clinical team and I view this as potentially a way*  
17 *to maximize a signal here because as I pointed out, all*  
18 *those peaks and valleys that occur over the course of the*  
19 *trial now should be adequately handled, observed and now*  
20 *we'll have a true measure at the end of the trial.*

21 Your second question was really around the baseline  
22 demographics. It's important to put this out. The community  
23 is really interested. They want to see data as quickly as  
24 possible. Many of our PIs have said, can we take a look at  
25 background immunomodulator use. We just want to see the  
26 data.

27 We'd like to see what the average daily steroid doses,  
28 duration of disease, and things of that nature. So, these are  
all important things for us to show to the community, and  
we already have that data. It's just baseline data. So, why  
not put it out at a major medical conference?

The important thing for investors to pay attention to is the  
average prednisone dose. I'll remind everyone in the last  
trial, the Phase 2 trial, we had an average dose somewhere  
in that 11 to 13 range. This trial, where we're enrolling  
patients with a slightly lower basement dose of 7.5

1 milligrams, I expect that prednisone dose may be maybe a  
2 little bit lower, but we want to take a look at that. And then  
3 that helps with all the investors that want to do the  
4 modeling with regards to how much steroid delta you want  
to see there.

5 So it's important to get this baseline data out there, make  
6 sure we more or less enrolled per the IE criteria in our trial.

7 (Emphasis added.)

8 The First Quarter 2025 Financial Report

9 37. On May 7, 2025, aTyr issued a press release announcing first quarter  
10 2025 financial results and providing a corporate update (the "1Q25 Press Release").  
11 The 1Q25 Press Release included an update on aTyr's Phase 3 EFZO-FIT study,  
12 stating in pertinent part:

13 On track to announce topline data in the third quarter of  
14 2025 from the global pivotal Phase 3 EFZO-FIT™ study to  
15 evaluate the efficacy and safety of efzofitimid in patients  
16 with pulmonary sarcoidosis. This is a randomized, double-  
17 blind, placebo-controlled, 52-week study consisting of three  
18 parallel cohorts randomized equally to either 3.0 mg/kg or  
19 5.0 mg/kg of efzofitimid or placebo administered  
20 intravenously monthly for a total of 12 doses. The study  
21 enrolled 268 patients with pulmonary sarcoidosis at 85  
22 centers in nine countries. The trial design incorporates a  
23 forced steroid taper. ***The primary endpoint of the study is  
steroid reduction measured as the absolute change from  
baseline to week 48.*** Secondary endpoints include measures  
24 of sarcoidosis symptoms and lung function. Patients who  
25 complete the study and wish to receive treatment with  
efzofitimid outside of the clinical trial are eligible to  
participate in an Individual Patient Expanded Access  
Program.

26 (Emphasis added.)



1 concerning aTyr's study design for EFZO-FIT, giving the false impression that  
2 Efzofitimid would meet its primary endpoint. Further, Defendants misled investors  
3 by creating an impression that the Phase 3 EFZO-FIT study would: (a) reveal the  
4 therapy's efficacy when compared with the placebo through the study's forced steroid  
5 taper design; and (b) allow patients to effectively remove steroids from their  
6 treatment plans. However, Defendants failed to disclose that the design study was not  
7 signaling the endpoint objective and there may be other factors that permit patients to  
8 effectively remove steroids from their treatment plans. Therefore, the Phase 3 EFZO-  
9 FIT study would fail to meet the primary endpoint in change from baseline in mean  
10 daily OCS dose at week 48.

### 11 The Truth Emerges

#### 12 aTyr Pharma Announces Topline Results from Phase 3 EFZO-FIT Study

13 41. On September 15, 2025, before market open, aTyr issued a press release  
14 announcing topline results from its Phase 3 EFZO-FIT study. In conjunction with the  
15 announcement, aTyr hosted an investor presentation that included the following  
16 slides on key findings, takeaways and next steps:

17 **Summary of Key Findings**

- 18 • Study did not meet primary endpoint in change from baseline in mean daily OCS dose at week 48
- 19 • 52.6% of patients treated with 5.0 mg/kg efzofitimid achieved complete steroid withdrawal at week 48 vs 40.2% on placebo (p=0.0919)
- 20 • Clinical improvement in KSQ-Lung score at week 48 observed in the 5.0 mg/kg efzofitimid treatment group vs placebo (p=0.0479).
- 21 • Greater proportion of patients achieved complete steroid withdrawal at week 48 with a KSQ-Lung score improvement in the 5.0 mg/kg efzofitimid treatment group (29.5%) vs placebo (14.4%) (p=0.0199)
- 22 • Lung function as measured by forced vital capacity (FVC) at week 48 was maintained
- 23 • Efzofitimid was generally well-tolerated at both the 3.0 mg/kg and 5.0 mg/kg doses, consistent with a previously observed safety profile in all trials conducted to date

24

25 • Findings demonstrate drug activity for efzofitimid across multiple clinically relevant efficacy endpoints

26 • Company plans to engage with the U.S. FDA to determine the path forward for efzofitimid in pulmonary sarcoidosis

27 3 OCS = oral corticosteroids; KSQ = King's Sarcoidosis Questionnaire; FDA = Food and Drug Administration

28 As the primary endpoint did not achieve statistical significance, p-values for other endpoints should be interpreted as nominal p-values.

## Key Takeaways and Next Steps

- Evidence of drug activity observed for 5.0 mg/kg efzofitimod across multiple clinically relevant efficacy endpoints
- Clinical improvement in quality of life as measured by the KSQ-Lung for 5.0 mg/kg efzofitimod vs placebo
- Preservation of lung function with efzofitimod 5.0 mg/kg
- Generally well-tolerated at both the 3.0 mg/kg and 5.0 mg/kg doses, consistent with a previously observed safety profile in all trials conducted to date

### Planned Next Steps

- Present EFZO-FIT™ topline results at the European Respiratory Society Congress on September 30, 2025, at 8:44am CEST in Amsterdam, Netherlands
  - Engage with the U.S. FDA to determine the path forward for efzofitimod in pulmonary sarcoidosis

9

alIyr

42. Defendant Shukla also detailed the key results of the EFZO-FIT study during the investor presentation, stating in relevant part:

The study, however, did not meet the primary endpoint of change from baseline in mean daily oral corticosteroid or OCS dose at week 48.

Some additional key findings include 52.6% of patients treated with five milligrams per kilogram of Efzofitimod, achieved complete steroid withdrawal at week 48 versus 40.2% on placebo. A clinical improvement in the King Sarcoidosis Questionnaire or KSQ lung score changed from baseline at week 48 was observed for five milligrams per kilogram of Efzofitimod compared to placebo. And a greater proportion of patients achieved both complete steroid withdrawal at week 48, with KSQ lung score improvement in the five milligram per kilogram Efzofitimod arm compared to placebo. The lung function as measured by [indiscernible] capacity or FVC at week 48 was maintained. And finally, Efzofitimod was well tolerated at both the three and five milligram per kilogram

1 doses with a safety profile consistent with that what we've  
2 observed in all trials conducted to date.

3 This study demonstrates that patients with chronic  
4 symptomatic sarcoidosis can be managed with substantially  
5 lower steroid doses than previously thought without the fear  
6 of worsening disease. In spite of a higher-than-anticipated  
7 placebo response, we found that treatment with Efzofitimod  
8 was associated with a greater amount of steroid reduction,  
9 including steroid withdrawal, a clinical improvement and  
10 the quality of life for these patients and the maintenance of  
11 lung function. This is the first Phase 3 trial and largest ever  
12 interventional study conducted in pulmonary and the data  
13 generated from this study is likely to inform treatment  
14 practices for all sarcoidosis patients moving forward. Based  
15 on these consistent findings, which we believe indicate drug  
16 activity for Efzofitimod across multiple clinically relevant  
17 efficacy endpoints, we plan to engage with the FDA to  
18 determine the path forward for Efzofitimod in pulmonary  
19 sarcoidosis.

20 As a reminder, EFZO-FIT was a global Phase 3 52-week  
21 randomized, double-blind, placebo-controlled, multicenter  
22 study in 268 patients with pulmonary sarcoidosis. It  
23 consisted of three parallel cohorts, randomized equally to  
24 either three or five milligrams per kilogram of Efzofitimod  
25 or placebo, dosed intravenously once a month for a total of  
26 12 doses. The primary endpoint of the study was steroid  
27 reduction at week 48. Additionally, clinical and efficacy  
28 assessments included the KSQ lung score or FVC, complete  
steroid withdrawal all at week 48.

In terms of the trial design, the study included a protocol  
guided steroid taper in the first 12 weeks of the study,  
followed by continued taper or rescue until week 48.  
Steroid taper and titration were guided by the Patient Global  
Assessment, or PGA, which was administered every two  
weeks. If there was any clinical worsening the principal  
investigator of PI was required, to rescue based on this  
PGA. And if there was improvement, the PI was required to  
taper.

1 \* \* \*

2 In our modeling, we assumed that patients on Efzofitimid  
3 would taper from baseline to an average daily prednisone  
4 dose between one to four milligrams, with placebo expected  
5 to taper to between four to seven. So, the drug performed  
6 accordingly to what we projected. However, we did not  
7 achieve statistical significance as the placebo tapering  
8 outperformed even our most aggressive modeling. Another  
9 important assessment of steroid reduction in the study was  
10 patients that achieved complete steroid withdrawal at week  
11 48.

12 43. The above-cited investor presentation and statements made by  
13 Defendant Shukla contradicted prior statements made by Defendants in previous  
14 press releases and presentations. Importantly, Defendant Shukla had previously  
15 reiterated that the EFZO-FIT study was a “real major Phase 3 catalyst,” particularly  
16 pertaining to the capability of Efzofitimid to remove steroid usage from pulmonary  
17 sarcoidosis patients’ treatment plans.

18 44. Analysts covering aTyr were surprised by the Company’s announcement  
19 of missing the trial’s primary endpoint. For example, Wells Fargo drastically lowered  
20 its price target from \$25 per share to \$1 per share, noting it would “await further  
21 clarity before getting constructive.” Likewise, RBC Capital Markets substantially  
22 lowered its price target from \$16.00 per share to \$1.50 per share, stating that the miss  
23 “creates a challenging path forward for Efzo[fitimid].” Similarly, H.C. Wainwright  
& Co. issued a research note on aTyr’s trial results, stating in relevant part:

24 [aTyr] Management notes that the higher than expected  
25 placebo results, which were greater than even the  
26 company's most aggressive modeling predicted, were a key  
27 driver of this statistically miss. Despite the treatment arm  
28 acting as expected, with a 73.6% steroid reduction from  
baseline at week 48, the placebo arm saw a 63.3% steroid  
reduction. The company noted this higher than anticipated  
steroid reduction in the placebo arm could be due to the  
rigorous study design, which implemented Patients Global

1 Assessment (PGA) every two weeks. The frequency of this  
2 assessment appears to be higher than current real-world  
3 practice, which may be a factor, as well as the impact of  
4 background immunosuppression regimens that this very  
5 sick patient population were concomitantly on. Both these  
6 factors will need to be teased out in further post-hoc  
7 analyses.

8 45. As a result, investors and the market immediately reacted to these  
9 revelations. The price of aTyr's common stock declined from a closing price of \$6.03  
10 per share on September 12, 2025, to \$1.02 per share on September 15, 2025,  
11 a decline of 83.2% in just a single trading day.

#### 12 **Loss Causation and Economic Loss**

13 46. During the Class Period, as detailed herein, Defendants made materially  
14 false and misleading statements and engaged in a scheme to deceive the market and a  
15 course of conduct that artificially inflated the price of aTyr's common stock and  
16 operated as a fraud or deceit on the Class Period purchasers and sellers of aTyr's  
17 respective securities by materially misleading the investing public. Later, Defendants'  
18 prior misrepresentations and fraudulent conduct became apparent to the market, the  
19 price of aTyr's common stock materially declined, as the prior artificial inflation  
20 came out of the price over time. As a result of their purchases and/or sales of aTyr's  
21 relevant securities during the Class Period, Plaintiff and other members of the Class  
22 suffered economic loss, i.e., damages under federal securities laws.

23 47. aTyr's stock price fell in response to the corrective events on September  
24 15, 2025, as alleged herein. On this date, Defendants and analysts disclosed  
25 information that was directly related to the Defendants' prior misrepresentations and  
26 material omissions concerning the design and endpoints of aTyr's Phase 3 trial of  
27 Efzofitimid for patients with pulmonary sarcoidosis.  
28



1 *Affiliated Ute Citizens of Utah v. United States*, 406 U.S. 128 (1972). All that is  
2 necessary is that the facts withheld be material in the sense that a reasonable investor  
3 might have considered the omitted information important in deciding whether to buy  
4 or sell the subject security.

5 **No Safe Harbor**  
6 **(Inapplicability of Bespeaks Caution Doctrine)**

7 51. The statutory safe harbor provided for forward-looking statements under  
8 certain circumstances does not apply to any of the material misrepresentations and  
9 omissions alleged in this Complaint. As alleged above, Defendants' liability stems  
10 from the fact that they provided investors with statements about business operations  
11 and prospects while at the same time omitting material risks that undermined the  
12 truthfulness of their statements.

13 52. To the extent certain of the statements alleged to be misleading or  
14 inaccurate may be characterized as forward looking, they were not identified as  
15 "forward-looking statements" when made and there were no meaningful cautionary  
16 statements identifying important factors that could cause actual results to differ  
17 materially from those in the purportedly forward-looking statements.

18 53. Defendants are also liable for any false or misleading "forward-looking  
19 statements" pleaded because, at the time each "forward-looking statement" was  
20 made, the speaker knew the "forward-looking statement" was false or misleading and  
21 the "forward-looking statement" was authorized and/or approved by an executive  
22 officer of aTyr who knew that the "forward-looking statement" was false.  
23 Alternatively, none of the historic or present-tense statements made by Defendants  
24 were assumptions underlying or relating to any plan, projection, or statement of  
25 future economic performance, as they were not stated to be such assumptions  
26 underlying or relating to any projection or statement of future economic performance  
27 when made, nor were any of the projections or forecasts made by the defendants  
28

1 expressly related to or stated to be dependent on those historic or present-tense  
2 statements when made.

3 **CLASS ACTION ALLEGATIONS**

4 54. Plaintiff brings this action as a class action pursuant to Federal Rules of  
5 Civil Procedure 23(a) and (b)(3) on behalf of a Class, consisting of all those who  
6 purchased or otherwise acquired aTyr’s common stock, purchased call options on  
7 aTyr common stock, and/or sold put options on aTyr common stock, during the Class  
8 Period (the “Class”); and were damaged upon the revelation of the alleged corrective  
9 disclosure. Excluded from the Class are defendants herein, the officers and directors  
10 of the Company, at all relevant times, members of their immediate families and their  
11 legal representatives, heirs, successors or assigns and any entity in which defendants  
12 have or had a controlling interest.

13 55. The members of the Class are so numerous that joinder of all members is  
14 impracticable. Throughout the Class Period, aTyr’s common stock was actively  
15 traded on the NASDAQ. While the exact number of Class members is unknown to  
16 Plaintiff at this time and can be ascertained only through appropriate discovery,  
17 Plaintiff believes that there are hundreds or thousands of members in the proposed  
18 Class. Record owners and other members of the Class may be identified from records  
19 maintained by aTyr or its transfer agent and may be notified of the pendency of this  
20 action by mail, using the form of notice similar to that customarily used in securities  
21 class actions. As of August 1, 2025, there were 97,986,634 shares of the Company’s  
22 common stock outstanding. Upon information and belief, these shares are held by  
23 thousands, if not millions, of individuals located throughout the country and possibly  
24 the world. Joinder would be highly impracticable.

25 56. Plaintiff’s claims are typical of the claims of the members of the Class as  
26 all members of the Class are similarly affected by Defendants’ wrongful conduct in  
27 violation of federal law complained of herein.

28

1           57. Plaintiff will fairly and adequately protect the interests of the members  
2 of the Class and has retained counsel competent and experienced in class and  
3 securities litigation. Plaintiff has no interests antagonistic to or in conflict with those  
4 of the Class.

5           58. Common questions of law and fact exist as to all members of the Class  
6 and predominate over any questions solely affecting individual members of the Class.  
7 Among the questions of law and fact common to the Class are:

8           (a) whether the federal securities laws were violated by Defendants' acts as  
9 alleged herein;

10           (b) whether statements made by Defendants to the investing public during  
11 the Class Period misrepresented material facts about the business, operations and  
12 management of aTyr;

13           (c) whether the Individual Defendants caused aTyr to issue false and  
14 misleading financial statements during the Class Period;

15           (d) whether Defendants acted knowingly or recklessly in issuing false and  
16 misleading financial statements;

17           (e) whether the prices of aTyr's common stock during the Class Period were  
18 artificially inflated because of the Defendants' conduct complained of herein; and

19           (f) whether the members of the Class have sustained damages and, if so,  
20 what is the proper measure of damages.

21           59. A class action is superior to all other available methods for the fair and  
22 efficient adjudication of this controversy since joinder of all members is  
23 impracticable. Furthermore, as the damages suffered by individual Class members  
24 may be relatively small, the expense and burden of individual litigation make it  
25 impossible for members of the Class to individually redress the wrongs done to them.  
26 There will be no difficulty in the management of this action as a class action.

27  
28



1 securities. Such reports, filings, releases and statements were materially false and  
2 misleading in that they failed to disclose material adverse information and  
3 misrepresented the truth about the Company.

4 64. By virtue of his position at the Company, the Individual Defendant had  
5 actual knowledge of the materially false and misleading statements and material  
6 omissions alleged herein and intended thereby to deceive Plaintiff and the other  
7 members of the Class, or, in the alternative, the Defendants acted with reckless  
8 disregard for the truth in that they failed or refused to ascertain and disclose such  
9 facts as would reveal the materially false and misleading nature of the statements  
10 made, although such facts were readily available to them. Said acts and omissions of  
11 the Defendants were committed willfully or with reckless disregard for the truth. In  
12 addition, each defendant knew or recklessly disregarded that material facts were  
13 being misrepresented or omitted as described above.

14 65. Information showing that Defendants acted knowingly or with reckless  
15 disregard for the truth is peculiarly within Defendants' knowledge and control. As a  
16 senior manager and director of the Company, the Individual Defendant had  
17 knowledge of the details of aTyr's internal affairs.

18 66. The Individual Defendant is liable both directly and indirectly for the  
19 wrongs complained of herein. Because of his position of control and authority, the  
20 Individual Defendant was able to and did, directly or indirectly, control the content of  
21 the statements of the Company. As an officer and director of a publicly-held  
22 company, the Individual Defendant had a duty to disseminate timely, accurate, and  
23 truthful information with respect to aTyr's businesses, operations, future financial  
24 condition and future prospects. As a result of the dissemination of the aforementioned  
25 false and misleading reports, releases and public statements, the market price of  
26 aTyr's common stock was artificially inflated throughout the Class Period. In  
27 ignorance of the adverse facts concerning the Company which were concealed by  
28 Defendants, Plaintiff and the other members of the Class purchased or otherwise

1 acquired aTyr's common stock at artificially inflated prices, and/or to bought or sold  
2 options based on an inflated value of aTyr common stock, and relied upon the price  
3 of the common stock, the integrity of the market for the common stock and/or upon  
4 statements disseminated by Defendants, and were damaged thereby.

5         67. During the Class Period, aTyr's common stock was traded on an active  
6 and efficient market. Plaintiff and the other members of the Class, relying on the  
7 materially false and misleading statements described herein, which the Defendants  
8 made, issued or caused to be disseminated, or relying upon the integrity of the  
9 market, purchased or otherwise acquired shares of aTyr's common stock at prices  
10 artificially inflated by Defendants' wrongful conduct, and/or bought or sold options  
11 based on an artificially inflated value of aTyr common stock caused by Defendants'  
12 wrongful conduct. Had Plaintiff and the other members of the Class known the truth,  
13 they would not have purchased or otherwise acquired said common stock, and/or  
14 traded the relevant options on aTyr common stock. Nor would have Plaintiff and  
15 other members of the Class had purchased or otherwise acquired aTyr stock, and/or  
16 traded the relevant option on aTyr common stock, at the artificial prices that were  
17 paid or sold. At the time of the purchases, acquisitions, and/or option tradings by  
18 Plaintiff and the Class, the true value of aTyr's common stock was substantially  
19 lower than the prices paid by Plaintiff and the other members of the Class. The  
20 market price of aTyr's common stock declined sharply upon public disclosure of the  
21 facts alleged herein to the injury of Plaintiff and Class members.

22         68. By reason of the conduct alleged herein, Defendants knowingly or  
23 recklessly, directly or indirectly, have violated Section 10(b) of the Exchange Act and  
24 Rule 10b-5 promulgated thereunder.

25         69. As a direct and proximate result of Defendants' wrongful conduct,  
26 Plaintiff and the other members of the Class suffered damages in connection with  
27 their respective purchases, acquisitions and sales of the Company's common stock  
28

1 during the Class Period, upon the disclosure that the Company had been  
2 disseminating misrepresented financial statements to the investing public.

3 **COUNT II**  
4 ***Against the Individual Defendant***  
5 ***for Violations of Section 20(a) of the Exchange Act***

6 70. Plaintiff repeats, realleges, and reincorporates the allegations contained  
7 above in Paragraphs 1-59 as if fully set forth herein.

8 71. During the Class Period, the Individual Defendant participated in the  
9 operation and management of the Company, and conducted and participated, directly  
10 and/or indirectly, in the conduct of the Company's business affairs. Because of his  
11 senior position, he knew the adverse non-public information about aTyr's  
12 misstatements.

13 72. As an officer and director of a publicly owned company, the Individual  
14 Defendant had a duty to disseminate accurate and truthful information, and to correct  
15 promptly any public statements issued by aTyr, which had become materially false or  
16 misleading.

17 73. Because of his position of control and authority as a senior officer, the  
18 Individual Defendant was able to, and did, control the contents of the various reports,  
19 press releases and public filings which aTyr disseminated in the marketplace during  
20 the Class Period concerning the misrepresentations. Throughout the Class Period, the  
21 Individual Defendant exercised his power and authority to cause aTyr to engage in  
22 the wrongful acts complained of herein. The Individual Defendant, therefore, was a  
23 "controlling person" of the Company within the meaning of Section 20(a) of the  
24 Exchange Act. In this capacity, he participated in the unlawful conduct alleged,  
25 which artificially inflated the market price of aTyr's common stock.

26 74. The Individual Defendant, therefore, acted as a controlling person of the  
27 Company. By reason of his senior management position and a being director of the  
28 Company, the Individual Defendant had the power to direct the actions of, and

1 exercised the same to cause aTyr to engage in the unlawful acts and conduct  
2 complained of herein. The Individual Defendant exercised control over the general  
3 operations of the Company and possessed the power to control the specific activities  
4 which comprise the primary violations about which Plaintiff and the other members  
5 of the Class complain.

6 75. By reason of the above conduct, the Individual Defendant and/or aTyr  
7 are liable pursuant to Section 20(a) of the Exchange Act for the violations committed  
8 by the Company.

9 **PRAYER FOR RELIEF**

10 76. **WHEREFORE**, Plaintiff demands judgment against Defendants as  
11 follows:

12 A. Determining that the instant action may be maintained as a class action  
13 under Rule 23 of the Federal Rules of Civil Procedure, certifying Plaintiff as the  
14 Class representative;

15 B. Requiring Defendants to pay and all damages sustained by Plaintiff and  
16 the Class by reason of the acts and transactions alleged herein;

17 C. Awarding Plaintiff and the other members of the Class pre-judgment and  
18 post judgment interest, as well as their reasonable attorneys' fees, expert fees and  
19 other costs; and

20 D. Awarding such other and further relief as this Court may deem just and  
21 proper.

22 **DEMAND FOR TRIAL BY JURY**

23 77. Plaintiff hereby demands a trial by jury.  
24  
25  
26  
27  
28