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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LUIS GONZALEZ DIEZ, Individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

RICHTECH ROBOTICS INC., WAYNE
HUANG, and MICHAEL HUANG,

Defendants.

Case No. 2:26-cv-00231-RFB-MDC

**STIPULATION AND [PROPOSED] ORDER
APPOINTING CO-LEAD PLAINTIFFS
AND CO-LEAD COUNSEL**

Lead Plaintiff Movants, Charles Talisman (“Talisman”) and Hudson Mac Cayman Holding Company (“Hudson”), by and through their undersigned counsel, hereby stipulate as follows in support of their request for appointment as Co-Lead Plaintiffs and approval of their selection of Co-Lead Counsel:

WHEREAS, on February 2, 2026, Luis Gonzalez Diez commenced the above-captioned action (the “Action”) alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Richtech Robotics Inc. (“Richtech”) (*see* Dkt. No. 1);

WHEREAS, as a putative class action alleging violations of the federal securities laws, this Action is governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), which provides, *inter alia*, that any putative Class member may move for appointment as Lead Plaintiff in the Action within 60 days of publication of notice of the pendency of the Action—here, on or before April 3, 2026 (*see* 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(aa));

WHEREAS, on April 3, 2026, five members or member groups of the putative Class alleged in the Action filed timely, separate motions seeking appointment as Lead Plaintiff in the Action and approval of their respective selections of Lead Counsel for the Action: (i) Hudson (Dkt. No. 20); (ii)

1 Steven Crosby (Dkt. No. 23); (iii) Talisman (Dkt. No. 24); (iv) Jie Ci Li (Dkt. No. 25); and (v) Brian
2 Zhang and Steve Rodgers (Dkt. No. 26);

3 WHEREAS, Hudson and Talisman are the only remaining competing movants, as all other
4 movants have either withdrawn their motions or filed notices of non-opposition (*see* Dkt. Nos. 27; 29;
5 32);

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

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

12 WHEREAS, Hudson and Talisman have each provided sworn Certifications pursuant to the
13 PSLRA in support of their respective applications for Lead Plaintiff appointment, setting forth, *inter*
14 *alia*, their transactions in Richtech securities (*see* Dkt. Nos. 21-4; 24-2);

15 WHEREAS, Hudson claims to have sustained losses of approximately \$203,560.80 as a result
16 of Defendants’ alleged wrongful conduct (*see* Dkt. No. 21-5);

17 WHEREAS, Talisman claims to have sustained losses of approximately \$102,158.80 as a
18 result of Defendants’ alleged wrongful conduct (*see* Dkt. No. 24-3);

19 WHEREAS, accordingly, Hudson and Talisman have each alleged a significant financial
20 interest in the outcome of this litigation;

21 WHEREAS, Hudson and Talisman submit that they are also each qualified to serve as Lead
22 Plaintiffs in this case given, among other things, their respective Lead Plaintiff motion submissions
23 (Dkt. Nos. 20 and 24);

24 WHEREAS, having reviewed one another’s submissions to the Court, Hudson and Talisman
25 believe that they each satisfy the typicality and adequacy requirements of Rule 23;

26 WHEREAS, after reviewing each other’s submissions to the Court, Hudson and Talisman —
27 as the only two remaining movants in contention for appointment as Lead Plaintiff—have decided
28 that it is in the best interests of the Class to join together as Co-Lead Plaintiffs and for their respective

1 selections of Levi & Korsinsky, LLP (“Levi & Korsinsky”) and Hagens Berman Sobol Shapiro LLP
2 (“Hagens Berman”) to serve as Co-Lead Counsel, and for Aldrich Law Firm, LTD. (“Aldrich”) and
3 Albright, Stoddard, Warnick & Albright (“Albright”) to serve as Liaison Counsel, in that it will, *inter*
4 *alia*, allow their counsel to pool their resources to immediately and efficiently commence prosecution
5 of this Action and avoid further delay associated with a protracted lead plaintiff dispute;

6 WHEREAS, Hudson and Talisman are committed to supervising the conduct of this litigation
7 by their counsel and to ensuring that counsel coordinate appropriately, prosecute the Action
8 efficiently, and avoid any duplication of effort in the conduct of the litigation; and

9 WHEREAS, courts have endorsed stipulations among competing Lead Plaintiff movants, like
10 here, as promoting the statutory purposes of the PSLRA, and have permitted “independent lead
11 plaintiff movants [to] join together to help ensure that adequate resources and experience are available
12 to the prospective class in the prosecution of th[e] action and because [e]mploying a co-lead plaintiff
13 structure . . . will also provide the proposed class with the substantial benefits of joint decision-
14 making.” *In re Rockwell Med., Inc. Sec. Litig.*, No. 1:16-cv-01691-RJS, Dkt. No. 18 at 2–3 (S.D.N.Y.
15 May 20, 2016) (internal quotation marks omitted) (citing *Pirelli Armstrong Tire Corp. Retiree Med.*
16 *Benefits Tr. v. LaBranche & Co.*, 229 F.R.D. 395, 420 (S.D.N.Y. 2004)); *see also Qawasmi v.*
17 *American Airlines Group Inc.*, No. 4:24-cv-00763-O (N.D. Tex. Nov. 22, 2024) (Dkt. No. 38)
18 (approving stipulation of competing lead plaintiff movants to serve as co-lead plaintiffs and approving
19 their selection of co-lead counsel); *In re Grab Holdings Ltd. Sec. Litig.*, No. 1:22-cv-02189-VM
20 (S.D.N.Y.), Dkt. No. 39 (same); *In re Altimune, Inc. Sec. Litig.*, No. 8:24-cv-01315-ABA (D. Md.),
21 Dkt. No. 22 (same); *Pizzuto v. Homology Meds., Inc.*, No. 2:22-cv-01968-FLA (JPRx) (C.D. Cal.),
22 Dkt. No. 38 (same); *Maurer v. Argos Therapeutics Inc.*, No. 1:17-cv-00216-TDS-LPA (M.D.N.C.),
23 Dkt. No. 26 (same); *In re Facebook, Inc. Sec. Litig.*, No. 5:18-cv-01725-EJD (N.D. Cal. Aug. 3,
24 2018), Dkt. No. 56 at 2 (approving stipulation of lead plaintiff movants where movants “concluded
25 that a protracted dispute concerning lead plaintiff appointment . . . [was] not in the best interests of
26 the class and that jointly prosecuting [the] litigation would be appropriate and assist with the speedy
27 commencement of [the] litigation”); *In re Millennial Media, Inc. Sec. Litig.*, 87 F. Supp. 3d 563, 570–
28 71 (S.D.N.Y. 2015) (“A co-lead plaintiff structure best protects the interests of the class . . . and gives

1 the class the advantages of the combined knowledge, experience, and judgment of both lead
2 plaintiffs.” (collecting cases)); *Martin v. BioXcel Therapeutics, Inc. et al.*, No. 3:23-cv-00915 (D.
3 Conn. Oct. 4, 2023) (approving joint motion of movants, finding “both the most adequate
4 representatives of the class and thus appointing them as co-Lead Plaintiffs will best serve the interests
5 of the class”);

6 IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court’s approval, as
7 follows:

8 1. Every pleading in this Action, and any related action that is consolidated with this Action,
9 shall hereafter bear the following caption:

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 IN RE RICHTECH ROBOTICS INC.
13 SECURITIES LITIGATION

Case No. 2:26-cv-00231-RFB-MDC

14 CLASS ACTION

15 THIS DOCUMENT RELATES TO:

[TITLE OF DOCUMENT]

16
17 2. When the document being filed pertains to all actions, the phrase “All Actions” shall appear
18 immediately after the phrase “This Document Relates To:”. When the document applies to some, but
19 not all, of the actions, the document shall list, immediately after the phrase “This Document Relates
20 To:”, the docket number for each individual action to which the document applies, along with the
21 name of the first-listed plaintiff in said action;

22 3. Hudson and Talisman’s motions for appointment as Lead Plaintiff and approval of selection
23 of counsel (Dkt. Nos. 20 and 24) are granted, and Hudson and Talisman are hereby appointed Co-
24 Lead Plaintiffs in this Action and any subsequently filed or transferred actions that are consolidated
25 with this Action, pursuant to 15 U.S.C. § 78u-4(a)(3)(B); and

26 4. Co-Lead Plaintiffs’ selections of Hagens Berman and Levi & Korsinsky as Co-Lead
27 Counsel and Aldrich and Albright as Liaison Counsel for the Class are hereby approved.

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IT IS SO STIPULATED.

Dated: April 17, 2026

Respectfully submitted,

ALDRICH LAW FIRM, LTD.

/s/ John P. Aldrich
John P. Aldrich
John P. Aldrich, Esq.
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*Liaison Counsel for Charles Talisman and
[Proposed] Liaison Counsel for the Class*

LEVI & KORSINSKY, LLP
Adam M. Apton (to be admitted pro hac vice)
33 Whitehall Street, 27th Floor
New York, NY 10004
Tel: (212) 363-7500
Fax: (212) 363-7171
Email: aapton@zlk.com

*Lead Counsel for Charles Talisman and
[Proposed] Co-Lead Counsel for the Class*

Dated: April 17, 2026

**ALBRIGHT, STODDARD, WARNICK &
ALBRIGHT**

/s/ G. Mark Albright
G. Mark Albright, Esq.
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Facsimile: (702) 384-0605
gma@albrightstoddard.com

*Liaison Counsel for Hudson Mac Cayman
Holding Company and [Proposed] Liaison
Counsel for the Class*

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**HAGENS BERMAN SOBOL SHAPIRO
LLP**

Reed R. Kathrein (to be admitted pro hac vice)
Lucas E. Gilmore (admitted pro hac vice)
715 Hearst Avenue, Suite 202 Berkeley, CA
94710 Telephone: (510) 725-3000 Facsimile:
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*Lead Counsel for Hudson Mac Cayman
Holding Company and [Proposed] Co-Lead
Counsel for the Class*

PURSUANT TO STIPULATION, IT IS SO ORDERED. The foregoing stipulation appointing Hagens Berman et al. and Levi & Korsinsky as Co-Lead Counsel and Aldrich and Albright as Liaison Counsel for the Class is **APPROVED. IT IS FURTHER ORDERED** that future stipulations must comply with LR IA 6-2, which requires the judicial signature block to appear on the same page as the last substantive matter of the stipulation. Failure to comply may result in denial or rejection of stipulation.

DATED: 5-5-26.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2026, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the email addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

/s/ G. Mark Albright
G. Mark Albright