

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

JAMIA FERNANDES, Individually and on
Behalf of All Others Similarly
Situated,

Plaintiff,

v.

CENTESSA PHARMACEUTICALS PLC,
SAURABH SAHA, GREGORY WEINHOFF,
MARELLA THORELL, FRANCESCO DE
RUBERTIS, ARJUN GOYAL, AARON
KANTOFF, BRETT ZBAR, MARY LYNNE
HEDLEY, SAMARTH KULKARNI, CAROL
STUCKLEY, and ROBERT CALIFF,

Defendants.

Case No.: 1:22-cv-08805-GHW

Hon. Gregory H. Woods

**STIPULATION AND ORDER APPOINTING CO-LEAD
PLAINTIFFS AND CO-LEAD COUNSEL**

WHEREAS, on September 28, 2022, Plaintiff Jamia Fernandes commenced the above-captioned action (the “Action”) in the United States District Court for the Central District of California alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Centessa Pharmaceuticals Plc. (“Centessa”) (Case No. 2:22-cv-07030-CAS-CFE, Dkt. No. 1);

WHEREAS, on October 15, 2022, the Action was transferred to the United States District Court for the Southern District of New York (Dkt. No. 14);

WHEREAS, as a putative class action alleging violations of the federal securities laws, the Action is governed by the Private Securities Litigation Reform Act of 1995 (“PSLRA”), which provides, in relevant part, that any putative Class member may move for appointment as Lead

Plaintiff in the Action within 60 days of publication of notice of pendency of the Action—here, on or before May 13, 2022 (15 U.S.C. § 78u-4(a)(3)(B)(iii)(I)(aa));

WHEREAS, on November 28, 2022, two members of the putative Class filed motions seeking appointment as Lead Plaintiff pursuant to the PSLRA: (i) Thomas Nagler (“Nagler”) (Dkt. No. 27); and (ii) Jamia Fernandes (“Fernandes”) (Dkt. No. 31);

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 (“Rule 23”);

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

WHEREAS, Nagler and Fernandes have each provided sworn Certifications pursuant to the PSLRA in support of their respective applications for Lead Plaintiff appointment, setting forth, *inter alia*, their transactions in Centessa securities;

WHEREAS, Nagler claims that he sustained approximately \$15,493.39 in losses as a result of Defendants’ alleged fraudulent conduct;

WHEREAS, Fernandes claims that she sustained approximately \$184.00 in losses as a result of Defendants’ alleged fraudulent conduct;

WHEREAS, Nagler and Fernandes both have financial interests in the outcome of this litigation;

WHEREAS, Nagler and Fernandes are also each qualified to serve as co-lead plaintiffs in this case given, among other things, their professional and educational backgrounds as described

in their respective declarations submitted in support of their respective motions (Dkt. No. 29-4; Dkt. No. 33-4);

WHEREAS, having reviewed one another's submissions to the Court, Nagler and Fernandes believe that they both satisfy the typicality and adequacy requirements of Rule 23; and

WHEREAS, having reviewed one another's submissions to the Court, Nagler and Fernandes believe that it is in the best interests of the Class for Nagler and Fernandes to serve as Co-Lead Plaintiffs and for their respective selections of Levi & Korsinsky, LLP ("Levi & Korsinsky") and Pomerantz LLP ("Pomerantz") to serve as Co-Lead Counsel;

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

1. Nagler and Fernandes are hereby appointed Co-Lead Plaintiffs in this Action and any subsequently filed or transferred actions that are consolidated with this Action, pursuant to 15 U.S.C. §78u-4(a)(3)(B); and
2. Co-Lead Plaintiffs' selections of Levi & Korsinsky and Pomerantz as Co-Lead Counsel are hereby approved.
3. Defendants' arguments as to Co-Lead Plaintiffs' adequacy are preserved.

IT IS SO STIPULATED.

[Signature blocks on next page.]

Respectfully submitted,

Dated: December 5, 2022

LEVI & KORSINSKY, LLP

/s/ Adam M. Apton

Adam M. Apton
55 Broadway, 10th Floor
New York, New York 10006
Tel: (212) 363-7500
Fax: (212) 363-7171
Email: aapton@zlk.com

Counsel for Lead Plaintiff Movants Thomas Nagler and [Proposed] Co-Lead Counsel for the Class

Dated: December 5, 2022

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman
J. Alexander Hood II
James M. LoPiano
600 Third Avenue, 20th Floor
New York, NY 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
jalieberman@pomlaw.com
ahood@pomlaw.com
jlopiano@pomlaw.com

Counsel for Lead Plaintiff Movant Jamia Fernandes and [Proposed] Co-Lead Counsel for the Class

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: New York, New York
December 12, 2022


SARAH L. CAVE
United States Magistrate Judge