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

LUCID ALTERNATIVE FUND, LP,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

INNOVIZ TECHNOLOGIES LTD., OMER  
DAVID KEILAF, and ELDAR CEGLA,

Defendants.

Case No.: 1:24-cv-01971-AT

Hon. Analisa Torres

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

WHEREAS, on March 15, 2024, Plaintiff Lucid Alternative Fund, LP, commenced the above-captioned action (the “Action”) in the United States District Court for the Southern District of New York alleging violations of the federal securities laws on behalf of a putative class consisting of investors in the securities of Innoviz Technologies Ltd. (“Innoviz”) (Dkt. No. 1);

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 May 14, 2024, members of the putative Class filed two motions seeking appointment as Lead Plaintiff pursuant to the PSLRA. The motions were filed by: (i) Jakob Raz (Dkt. No. 19); and (ii) Harvey Tesler and Joel Leon (Dkt. No. 23);

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, Messrs. Raz, Tesler and Leon have provided sworn Certifications pursuant to the PSLRA in support of their respective applications for Lead Plaintiff appointment, setting forth, *inter alia*, their transactions in Innoviz securities;

WHEREAS, Raz claims that he sustained approximately \$38,911.48 in losses as a result of Defendants’ alleged fraudulent conduct;

WHEREAS, Messrs. Tesler and Leon claim collectively that they sustained approximately \$44,964.00 in losses as a result of Defendants’ alleged fraudulent conduct;

WHEREAS, Messrs. Raz, Tesler and Leon have financial interests in the outcome of this litigation;

WHEREAS, Messrs. Raz, Tesler and Leon are also 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. 21-4; Dkt. No. 26-2);

WHEREAS, having reviewed one another’s submissions to the Court, Messrs. Raz, Tesler and Leon believe that they both satisfy the typicality and adequacy requirements of Rule 23; and

WHEREAS, having reviewed one another’s submissions to the Court, Messrs. Raz, Tesler and Leon believe that it is in the best interests of the Class for Messrs. Raz, Tesler and Leon 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;

WHEREAS, courts often endorse stipulations among competing lead plaintiff movants as promoting the statutory purposes of the PSLRA, and have 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, ECF 56 at 2-3 (N.D. Cal. Aug. 3, 2018) (approving stipulation of lead plaintiff movants); *see also Petersen v. Stem, Inc., et al.*, No. 3:23-cv-02329-MMC, ECF 72 (N.D. Cal. Aug. 22, 2023) (appointing co-lead plaintiffs and co-lead counsel pursuant to proposed so-ordered stipulation); *Deputy v. Akebia Therapeutics, Inc., et al.*, No. 1:22-cv-01411-AMD-VMS (E.D.N.Y. Jul. 22, 2022) (appointing co-lead plaintiffs pursuant to stipulation); *In re Grab Holdings Limited Securities Litigation*, No. 1:22-cv-02189-VM (S.D.N.Y. Jun. 7, 2022) (same);

WHEREAS, Defendants take no position on the stipulation and/or request for appointment of lead counsel;

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

1. Messrs. Raz, Tesler and Leon 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.

**IT IS SO STIPULATED.**

Dated: May 28, 2024

Respectfully submitted,

**LEVI & KORSINSKY, LLP**

/s/ Adam M. Apton

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*Counsel for Lead Plaintiff Movant Jakob  
Raz and Co-Lead Counsel for the Class*

Dated: May 28, 2024

**POMERANTZ LLP**

/s/ Jeremy A. Lieberman (with consent)

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*Counsel for Lead Plaintiff Movants Harvey  
Tesler and Joel Leon and Co-Lead Counsel  
for the Class*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Clerk of Court is directed to terminate the motions at ECF Nos. 19 and 23.

Dated: June 4, 2024  
New York, New York



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**ANALISA TORRES**  
United States District Judge