

EXHIBIT A

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24 **UNITED STATES DISTRICT COURT**
25 **NORTHERN DISTRICT OF CALIFORNIA**

26 **IN RE TEZOS SECURITIES LITIGATION**

Master File No. 17-cv-06779-RS

CLASS ACTION

27 This document relates to:

**DECLARATION OF ARMAN ANVARI IN
SUPPORT OF MOTION TO WITHDRAW
AS LEAD PLAINTIFF**

28 ALL ACTIONS.

Date: March 7, 2019

Time: 1:30 p.m.

Crtrm: 3

Judge: Hon. Richard Seeborg

1 I, Arman Anvari, declare as follows pursuant to 28 U.S.C. § 1746:

2 1. On March 6, 2018, the Court appointed me as the Lead Plaintiff in this action, and my
3 attorneys as the Co-Lead Counsel. Dkt. No. 101.

4 2. Since my appointment as Lead Plaintiff, I have actively participated in the litigation
5 of this lawsuit, including:

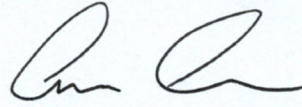
- 6 • reviewing, commenting on and revising drafts of the Consolidated Class Action
7 Complaint filed on April 3, 2018 (Dkt. No. 108);
- 8 • reviewing the motions to dismiss filed by the Defendants (Dkt. Nos. 117, 119, 123,
9 126), and commenting on and revising drafts of the opposition briefs filed by my
10 attorneys in response to each of those motions to dismiss (Dkt. Nos. 132-135);
- 11 • engaging in substantial discovery efforts, including searching for and producing
12 documents to Defendants in response to their document requests, and providing
13 other discovery such as written responses to interrogatories and requests for
14 admissions served by Defendants;
- 15 • numerous and regular meetings/communications in person and via telephone and
16 email with my attorneys;
- 17 • involving myself in the one-day mediation between the parties that was conducted
18 on December 14, 2018 by reviewing and commenting on the written mediation
19 submissions and providing instructions to my attorneys during the mediation;
- 20 • approving the addition of named plaintiffs Pumaro LLC (“Pumaro”) and Artiom
21 Frunze to this lawsuit (Dkt. Nos. 183 and 186);
- 22 • causing the filing of the Motion for Class Certification on January 9, 2019 (Dkt.
23 No. 187), which seeks the appointment of Mr. Frunze and Pumaro as Class
24 Representatives; and
- 25 • providing input into the strategy and direction of this case generally.

26 3. Based on various legal arguments which Defendants intend to make, however, I
27 believe I will not be able to adequately represent the putative Class, and have instructed my attorneys
28 to seek my withdrawal as Lead Plaintiff. I believe that Pumaro and Mr. Frunze, if appointed as Class
Representatives, will capably represent the interests of the Class.

4. Until my withdrawal, I will continue to comply with my responsibilities as Lead
Plaintiff, including agreeing to make myself available for a deposition, as Defendants have requested.

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my
2 knowledge.

3 Executed this 23rd day of January, 2019 in Chicago, Illinois.

4 

5 _____
6 Arman Anvari