

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

IN RE FIBROGEN, INC., SECURITIES  
LITIGATION

Case No. 3:21-cv-02623-EMC

---

**SUMMARY NOTICE OF (I) PROPOSED SETTLEMENT AND PLAN OF  
ALLOCATION; (II) SETTLEMENT FAIRNESS HEARING; AND  
(III) MOTION FOR AN AWARD OF ATTORNEYS' FEES  
AND REIMBURSEMENT OF LITIGATION EXPENSES**

---

**TO: All persons who purchased or acquired FibroGen, Inc. (“FibroGen” or the “Company”) securities, including options, between December 20, 2018 through July 15, 2021, inclusive (the “Settlement Class Period”). You may be a member of the Settlement Class. If you do not wish to be a part of the Settlement Class, you must respond to this Notice with a written request for exclusion (see below). You may be eligible to share in the proceeds of the Settlement, but you must submit a Claim Form to participate in the Settlement (see below).**

**THIS NOTICE WAS AUTHORIZED BY THE COURT. IT IS NOT A LAWYER SOLICITATION. YOU MAY BE ENTITLED TO A CASH AWARD. PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY.**

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the Northern District of California (the “Court”), that the above-captioned litigation (the “Action”) has been certified as a class action for settlement purposes only on behalf of the Settlement Class, except for certain persons and entities who are excluded from the Settlement Class by definition as set forth in the full printed Notice of (I) Proposed Settlement and Plan of Allocation; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses (the “Notice”).

YOU ARE ALSO NOTIFIED that the Court-appointed Lead Plaintiffs on behalf of themselves and the Court-certified Settlement Class in the Action, have reached a proposed settlement of the Action for twenty-eight million, five-hundred thousand dollars (\$28,500,000.00) in cash (the “Settlement”), that, if approved by the Court, will resolve all claims in the Action.

A hearing will be held on May 16, 2024 at 1:30 p.m., before the Honorable Edward M. Chen at the United States District Court for the Northern District of California, San Francisco Courthouse, Courtroom 5 – 17<sup>th</sup> Floor, 450 Golden Gate Avenue, San Francisco, CA 94102, to determine, among other things, whether: (i) the proposed Settlement should be approved as fair, reasonable, and adequate; (ii) the Judgment as provided under the Stipulation and Agreement of Settlement (the “Stipulation”) should be entered dismissing the Action with prejudice against the Defendant Releasees; (iii) the proposed Plan of Allocation should be approved by the Court as fair and reasonable; (iv) Lead Counsel’s application for an award of attorneys’ fees and reimbursement

of expenses should be approved. The capitalized terms herein shall have the same meaning as they have in the Stipulation.<sup>1</sup>

The Court may adjourn the Settlement Hearing or any adjournment thereof without further written notice of any kind to the Settlement Class. Settlement Class Members should check the Court's PACER site (defined below) or the Settlement website, [www.FibroGenSecuritiesLitigation.com](http://www.FibroGenSecuritiesLitigation.com). Any updates regarding the Settlement Hearing, including any changes to the date or time of the hearing or updates regarding in-person, telephonic or video conference appearances at the hearing, will also be posted to the Settlement website.

**If you are a member of the Settlement Class, your rights will be affected by the pending Action and the Settlement, and you may be entitled to share in the Settlement Fund.** If you have not yet received the Notice and Claim Form, you may obtain copies of these documents by visiting the Settlement website at [www.FibroGenSecuritiesLitigation.com](http://www.FibroGenSecuritiesLitigation.com) or by contacting the Claims Administrator at:

IN RE FIBROGEN, INC., SECURITIES LITIGATION  
c/o JND Legal Administration  
P.O. Box 91482  
Seattle, WA 98111  
(877) 595-0137  
[www.FibroGenSecuritiesLitigation.com](http://www.FibroGenSecuritiesLitigation.com)  
[info@fibrogensecuritieslitigation.com](mailto:info@fibrogensecuritieslitigation.com)

Copies of the Notice and the Claim Form are also available by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the Office of the Clerk of Court, United States District Court for the Northern District of California, San Francisco Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102, or any other location of the Northern District of California between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

Inquiries, other than requests for the Notice or a Claim Form or for information about the status of a claim, may be made to Lead Counsel:

SAXENA WHITE P.A.  
Lester R. Hooker, Esq.  
7777 Glades Rd., Suite 300  
Boca Raton, FL 33434  
[settlements@saxenawhite.com](mailto:settlements@saxenawhite.com)

If you are a member of the Settlement Class, in order to potentially be eligible to receive a payment under the proposed Settlement, you must submit a Claim Form *postmarked or completed online no later than June 12, 2024*. If you are a Settlement Class Member and do not submit a proper Claim Form, you will not be eligible to share in the distribution of the net proceeds of the Settlement, but you will nevertheless be bound by any judgments or orders entered by the Court in the Action.

If you are a member of the Settlement Class and wish to exclude yourself from the Settlement Class, you must submit a request for exclusion such that it is *received no later than*

---

<sup>1</sup> The Stipulation can be viewed and/or obtained at [www.FibroGenSecuritiesLitigation.com](http://www.FibroGenSecuritiesLitigation.com), PACER, visiting the office of the Clerk of the Court, or by contacting Lead Counsel as described herein. For the precise terms of the Settlement, please see the Stipulation.

**April 18, 2024**, in accordance with the instructions set forth in the Notice. If you properly exclude yourself from the Settlement Class, you will not be bound by any judgments or orders entered by the Court in the Action and you will not be eligible to share in the proceeds of the Settlement.

Any objections<sup>2</sup> to the proposed Settlement, the proposed Plan of Allocation, or Lead Plaintiffs' motion for attorneys' fees and reimbursement of litigation expenses must be in writing and filed electronically or in person at any location of the United States District Court for the Northern District of California or mailed to the Class Action Clerk, United States District Court for the Northern District of California, San Francisco Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102-3489 such that they are *filed or received* **no later than April 18, 2024**, in accordance with the instructions set forth in the Notice. The Court can only approve or deny the Settlement and cannot change the terms.

**PLEASE DO NOT CONTACT THE COURT, THE CLERK'S OFFICE, DEFENDANTS, OR DEFENDANTS' COUNSEL REGARDING THIS NOTICE, THE PROPOSED SETTLEMENT, OR THE CLAIMS PROCESS.**

Dated: March 4, 2024

By Order of the Court  
United States District Court  
Northern District of California

---

<sup>2</sup> You can ask the Court to deny approval by filing an objection. You cannot ask the Court to order a different settlement; the Court can only approve or reject the Settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must clearly identify the case name and number (*In re FibroGen, Inc., Sec. Litig.*, Case No. 21-cv-2623) and include all information required by the Court as detailed in the Notice.