

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In re JUNO THERAPEUTICS, INC.

No. C16-1069-RSM

**NOTICE OF PROPOSED SETTLEMENT OF CLASS ACTION, MOTION FOR  
ATTORNEYS' FEES AND EXPENSES, AND FINAL APPROVAL HEARING**

**TO: ALL PERSONS OR ENTITIES THAT PURCHASED OR OTHERWISE ACQUIRED PUBLICLY TRADED COMMON STOCK OF JUNO THERAPEUTICS, INC. ("JUNO") FROM JUNE 4, 2016 TO NOVEMBER 22, 2016, BOTH DATES INCLUSIVE (THE "CLASS PERIOD").**

EXCLUDED FROM THE CLASS ARE ANY PARTIES WHO ARE OR HAVE BEEN DEFENDANTS IN THIS LITIGATION, THE PRESENT AND FORMER OFFICERS AND DIRECTORS OF JUNO AND ANY SUBSIDIARY THEREOF, MEMBERS OF THEIR IMMEDIATE FAMILIES AND THEIR LEGAL REPRESENTATIVES, HEIRS, SUCCESSORS OR ASSIGNS, AND ANY ENTITY IN WHICH ANY CURRENT OR FORMER DEFENDANT HAS OR HAD A CONTROLLING INTEREST.

***PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED BY LEGAL PROCEEDINGS IN THIS LITIGATION. IF YOU ARE A MEMBER OF THE CLASS DESCRIBED HEREIN, YOU MAY BE ENTITLED TO RECEIVE A PAYMENT PURSUANT TO THE PROPOSED SETTLEMENT DESCRIBED BELOW.***

**CLASS RECOVERY:** This Notice has been sent to you pursuant to an Order of the U.S. District Court, Western District of Washington (the "Court") in the above-captioned action (the "Action"). One of the purposes of this Notice is to inform you of the proposed Settlement of the Action for \$24 million. Plaintiffs estimate that there were approximately 19.8 million shares of Juno common stock traded during the Class Period that may have been damaged. Pursuant to the proposed Plan of Allocation (*see* Section III herein), if all affected Juno shares elect to participate in the Settlement, the average recovery per share could be \$1.21, before deduction of any fees, expenses, costs, and awards described herein. The actual amount disbursed to Class Members who participate in the Settlement may be more or less than this figure.

**POTENTIAL OUTCOME OF THE CASE:** Class counsel, on behalf of Class Plaintiffs, recognizes the expense, risks, and uncertain outcome of any litigation and subsequent appeals, especially for a complex action such as this with its inherent difficulties and delays. In fact, the parties disagree regarding many issues, including but not limited to: (a) whether any statements were false or misleading; (b) whether any person who made the allegedly false and misleading statements acted with the requisite state of mind (*scienter*); (c) the materiality of the allegedly false and misleading statements; and (d) the effect, if any, of those statements on the price of Juno's common stock. Defendants have denied and continue to deny all allegations of wrongdoing or liability whatsoever arising out of any of the conduct, statements, acts, or omissions alleged, or that could have been alleged, in the Action, and deny that Plaintiffs or the Class have suffered any damages, and the Settlement is not any admission of wrongdoing or liability.

**REASONS FOR SETTLEMENT:** Plaintiffs believe that the proposed Settlement is fair, reasonable and adequate to, and in the best interests of, the Class. Plaintiffs and their counsel have reached this conclusion after investigating and considering, among other things, the strengths and weaknesses of Plaintiffs' claims against Defendants, including Defendants' contentions that the Class's claims are without merit, the uncertainties of this complex litigation, and the concrete benefits provided by the Settlement to the Class Members. The Settlement was entered into after mediation proceedings. Without admitting any wrongdoing or liability on their part whatsoever, Defendants are nevertheless willing to settle provided that all of the claims of the Class are settled and compromised, in order to avoid the continuing burden, expense, inconvenience and distraction to Defendants in this Action.

**ATTORNEYS FEES AND COSTS SOUGHT:** Class Counsel has not received any payment for its services in conducting this litigation on behalf of Plaintiffs and the Class Members, nor has it been reimbursed for its out-of-pocket expenditures. If the Settlement is approved by the Court, Class Counsel will apply to the Court for attorneys' fees not to exceed 25% of the Settlement Amount, and reimbursement of expenses not to exceed \$500,000. If the amount requested by Class Counsel is approved by the Court, the average cost would be \$0.33 per share. In addition, a Compensatory Award for the time and expenses incurred by Class Plaintiffs will be sought, not to exceed \$10,000 each.

**IDENTIFICATION OF PLAINTIFFS' COUNSEL:** Requests for further information regarding the Action and this Notice may be directed to Class Counsel: Leigh Handelman Smollar, Esq., Pomerantz LLP, 10 South La Salle Street, Suite 3505, Chicago, IL 60603, lsmollar@pomlaw.com.

## **I. THE CLASS INVOLVED IN THE PROPOSED SETTLEMENT**

The proposed Settlement affects the rights of the Class Members. The Class consists of:

**All persons or entities that purchased or otherwise acquired the common stock of Juno Therapeutics, Inc. from June 4, 2016 to November 22, 2016, both dates inclusive.**

Excluded from the Class are any parties who are or have been Defendants in this litigation, the present and former officers and directors of Juno and any subsidiary thereof, members of their immediate families and their legal representatives, heirs, successors or assigns, and any entity in which any current or former Defendant has or had a controlling interest.

*The sending of this Notice should not be construed as any indication of the Court's view as to the merits of any claims or defenses asserted by any party to this Action.*

## **II. THE LITIGATION**

### **Summary of the Litigation**

This Action was commenced on July 12, 2016 in the U.S. District Court for the Western District of Washington. The case is known as *In re Juno Therapeutics, Inc.*, No. C16-1069-RSM.

Plaintiffs allege violations of the federal securities laws (specifically Sections 10(b) and 20(a) of the Exchange Act (15 U.S.C. § 78j(b) and 78(t)(a)) and Rule 10b-5 promulgated thereunder (17 C.F.R. § 240.10b-5)) against Defendants Juno, Hans E. Bishop, Steven D. Harr, and Mark J. Gilbert.

Juno was a Delaware corporation with its executive offices located at 307 Westlake Avenue, N., Suite 300, Seattle, WA 98109. The company was a highly-promotional development stage biopharmaceutical company traded on the NASDAQ exchange under the symbol "JUNO." On March 6, 2018, Celgene Corporation acquired Juno. As a result, Juno is no longer listed for trading on NASDAQ.

On October 19, 2016, the Court appointed Gilbert Hoang Nguyen as Lead Plaintiff. Lead Plaintiff filed an Amended Complaint on December 12, 2016, alleging securities violations by Defendants related to an immunotherapy cancer treatment candidate under development by Juno known as JCAR015, which focuses on the use of chimeric antigen receptor cells to treat a rare form of blood cancer called Acute Lymphoblastic Leukemia. Plaintiffs alleged that, during the Class Period, Juno's stock price was artificially inflated as a result of a series of allegedly untrue or materially misleading statements regarding JCAR015. Plaintiffs further contended that Defendants made these statements knowing them to be false or misleading, or recklessly disregarded their false or misleading natures, and further alleged that investors suffered injury as a result of the alleged inflation when the truth was disclosed.

Defendants have denied and continue to deny all allegations of any wrongdoing or liability whatsoever arising out of any of the conduct, statements, acts or omissions alleged, or that could have been alleged, in the Action.

### **Discovery, Investigation, and Research Conducted by Counsel**

Before agreeing to the Settlement, Class Counsel conducted extensive investigation and research into the merits of the Action. This investigation has included consultation with experts concerning the nature of immunotherapy and the potential to recover damages; interviews of confidential witnesses who previously worked at Juno; detailed reviews of Juno's public filings, SEC filings, press releases, and other public statements; review of more than 50,000 documents produced by Defendants; review of reports issued by financial and industry analysts relating to Juno; and research of the applicable law with respect to the claims asserted in the complaints filed in the Action, and the potential defenses thereto.

### **Proposed Settlement**

Class Counsel and Defendants' Counsel participated in protracted negotiations in mediation with the assistance of former U.S. District Court Judges Layn R. Phillips and Gary A. Feess. During these negotiations, the parties discussed, among other things, the respective claims and defenses, damage analyses, legal analyses, the evidence to be offered by the parties at trial, and other important factual and legal issues.

These negotiations resulted in the agreement to settle all claims of the Class against the Defendants, *i.e.*, the Stipulation, entered into on July 31, 2018. Class Counsel believe that the claims asserted in the Action have merit and that the evidence developed to date in the Action supports the claims asserted therein. Class Counsel assert, and believe the Class would present supporting evidence at trial establishing, liability against the Defendants under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934.

However, Class Counsel recognize and acknowledge the expense and length of continued proceedings, trial, and appeals, and have taken into account the uncertain outcome and the risk of any litigation, especially complex actions such as here. They are also mindful of the defenses asserted by Defendants and that Defendants have denied and continue to deny all allegations of wrongdoing or liability.

In light of the foregoing, Class Counsel believe that the Settlement set forth in the Stipulation provides an excellent recovery for the Class. Based on their evaluation, Class Counsel have determined that the Settlement is in the best interests of the Class.

## The Release

In consideration of the establishment of the Settlement Fund, Class Members who do not file for exclusion from the Class will release, discharge and dismiss with prejudice all of the Released Plaintiffs' Claims, including Unknown Claims, as against each and all of the Released Defendant Parties, as those terms are defined in the Stipulation, without costs to any party except as provided herein, upon the Effective Date. Class Plaintiffs and all Class Members, whether or not any such Person submits a Proof of Claim and Release Form or shares in the Net Settlement Fund, on behalf of themselves and each of their predecessors, successors, parents, subsidiaries, affiliates, custodians, agents, assigns, representatives, heirs, executors, trustees and administrators, will be deemed by this Settlement on the Effective Date to release and forever discharge the Released Defendant Parties from any and all of the Released Plaintiffs' Claims.

On the Effective Date, all Class Members, and anyone claiming through or on behalf of any of them, will be forever barred and enjoined from commencing, instituting, prosecuting or continuing to prosecute any action or other proceedings in any court of law or equity, arbitration tribunal, or administrative forum asserting the Released Claims against any of the Released Parties.

### **III. PROPOSED PLAN OF ALLOCATION**

The \$24,000,000 settlement amount and any interest earned thereon shall be the Settlement Fund. The Settlement Fund less taxes, approved costs, fees and expenses, including, but not limited to attorneys' fees (the "Net Settlement Fund") shall be distributed to Class Members who submit valid Proofs of Claim ("Authorized Claimants").

The Settlement Administrator shall determine each Authorized Claimant's *pro rata* share of the Net Settlement Fund based upon each Authorized Claimant's "Recognized Loss." The Recognized Loss formula is not intended to be an estimate of the amount of what a Class Member lost or might have been able to recover after a trial; nor is it an estimate of the amount that will be paid to Authorized Claimants pursuant to the Settlement. The Recognized Loss formula is simply the basis upon which the Net Settlement Fund will be proportionately allocated to Authorized Claimants.

The proposed Plan of Allocation has taken into consideration the Limitation on Damages provision of the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(e), as well as the principles of economic loss articulated by the Supreme Court in *Dura Pharmaceuticals, Inc. v. Broudo*, 544 U.S. 336 (2005). For purposes of this Settlement, the Recognized Loss shall be calculated as follows:

1. There is no Recognized Loss for any shares purchased before June 4, 2016.
2. For shares purchased on or between June 4, 2016 and July 7, 2016, and
  - (a) sold on or before July 7, 2016, the Recognized Loss per share is \$0.00.
  - (b) sold on or between July 8, 2016 and November 22, 2016, the Recognized Loss per share is the lesser of:
    - i. \$13.46; or
    - ii. the purchase price minus the sale price (excluding all fees, taxes and commissions). If this calculation results in a negative number, then the Recognized Loss is \$0.00.
  - (c) sold on or between November 23, 2016 and February 17, 2017, the Recognized Loss per share is the lesser of:
    - i. \$20.99; or
    - ii. the purchase price minus the sale price (excluding all fees, taxes and commissions). If this calculation results in a negative number, then the Recognized Loss is \$0.00; or
    - iii. the purchase price minus the "90-Day Lookback Value" on the date of sale/disposition provided in Table 1 below. If this calculation results in a negative number, then the Recognized Loss per share is \$0.
  - (d) that were still held as of the close of trading on February 17, 2017, the Recognized Loss per share is the lesser of
    - i. \$20.99; or
    - ii. the purchase price (excluding all fees, taxes and commissions) minus the average closing price of the shares during the 90-day period following the Class Period, which is \$20.18. If this calculation results in a negative number, then the Recognized Loss per share is \$0.
3. For shares purchased on or between July 8, 2016 and November 22, 2016, and
  - (a) sold on or before November 22, 2016, the Recognized Loss per share is \$0.00.
  - (b) sold on or between November 23, 2016 and February 17, 2017, the Recognized Loss per share is the lesser of:
    - i. \$7.52; or
    - ii. the purchase price minus the sale price (excluding all fees, taxes and commissions). If this calculation results in a negative number, then the Recognized Loss is \$0.00; or
    - iii. the purchase price minus the "90-Day Lookback Value" on the date of sale/disposition provided in Table 1

below. If this calculation results in a negative number, then the Recognized Loss per share is \$0.00.

- (c) that were still held as of the close of trading on February 17, 2017, the Recognized Loss per share is the lesser of
- i. \$7.52; or
  - ii. the purchase price (excluding all fees, taxes and commissions) minus the average closing price of the shares during the 90-day period following the Class Period, which is \$20.18. If this calculation results in a negative number, then the Recognized Loss per share is \$0.00.

<b>Sale / Disposition Date</b>	<b>90-Day Lookback Value</b>	<b>Sale / Disposition Date</b>	<b>90-Day Lookback Value</b>	<b>Sale / Disposition Date</b>	<b>90-Day Lookback Value</b>
11/23/2016	\$22.56	12/22/2016	\$19.54	1/24/2017	\$19.63
11/25/2016	\$22.79	12/23/2016	\$19.53	1/25/2017	\$19.64
11/28/2016	\$22.56	12/27/2016	\$19.53	1/26/2017	\$19.65
11/29/2016	\$22.21	12/28/2016	\$19.51	1/27/2017	\$19.66
11/30/2016	\$21.77	12/29/2016	\$19.49	1/30/2017	\$19.67
12/1/2016	\$21.46	12/30/2016	\$19.46	1/31/2017	\$19.70
12/2/2016	\$21.31	1/3/2017	\$19.47	2/1/2017	\$19.74
12/5/2016	\$21.20	1/4/2017	\$19.50	2/2/2017	\$19.76
12/6/2016	\$21.02	1/5/2017	\$19.52	2/3/2017	\$19.79
12/7/2016	\$20.82	1/6/2017	\$19.55	2/6/2017	\$19.82
12/8/2016	\$20.63	1/9/2017	\$19.57	2/7/2017	\$19.84
12/9/2016	\$20.45	1/10/2017	\$19.60	2/8/2017	\$19.85
12/12/2016	\$20.26	1/11/2017	\$19.60	2/9/2017	\$19.88
12/13/2016	\$20.09	1/12/2017	\$19.61	2/10/2017	\$19.92
12/14/2016	\$19.95	1/13/2017	\$19.62	2/13/2017	\$19.96
12/15/2016	\$19.86	1/17/2017	\$19.60	2/14/2017	\$20.01
12/16/2016	\$19.81	1/18/2017	\$19.62	2/15/2017	\$20.08
12/19/2016	\$19.74	1/19/2017	\$19.63	2/16/2017	\$20.13
12/20/2016	\$19.71	1/20/2017	\$19.63	2/17/2017	\$20.18
12/21/2016	\$19.62	1/23/2017	\$19.62		

**General Provisions:**

1. There shall be no Recognized Loss attributed to any Juno securities other than common stock.
2. The date of a purchase or sale of Juno common stock is the “trade” date and not the “settlement” date.
3. The first-in, first-out basis (“FIFO”) will be applied to both purchases and sales.
4. The date of covering a “short sale” is deemed to be the date of purchase of Juno common stock; and the date of a “short sale” is deemed to be the date of sale of Juno common stock. Shares originally sold short will have a Recognized Loss of zero.
5. Exercise of option contracts or the conversion of preferred stock into common stock will be considered to be purchases or sales of common stock as of the date of the exercise or conversion. Option premiums and the conversion price for preferred stock will be incorporated into the purchase/sale price of the common stock accordingly.

6. No cash payment will be made on a claim where the potential distribution amount is less than \$20.00. Please be advised that if you did not incur a Recognized Loss as defined in the Plan of Allocation, you will not receive a cash distribution from the Net Settlement Fund, but you will be bound by all determinations and judgments of the Court in connection with the Settlement, including being barred from asserting any of the Released Claims against the Released Parties.

7. The Court has reserved jurisdiction to allow, disallow or adjust the claim of any Class Member on equitable grounds.

8. No person shall have any claim against Class Counsel, the Settlement Administrator or other agent designated by Class Counsel, or any Defendant or any Defendants' Counsel based on the distribution made substantially in accordance with the Stipulation and this Plan of Allocation, or further orders of the Court.

9. Class members who do not submit valid Proofs of Claim will not share in the settlement proceeds. Class members who do not either submit a Request for Exclusion or submit a valid Proof of Claim will nevertheless be bound by the settlement and the Order and Final Judgment of the Court dismissing this Action.

#### **IV. REQUESTING EXCLUSION FROM THE CLASS**

##### **IF YOU ARE A MEMBER OF THE CLASS, YOU MAY BE ELIGIBLE TO SHARE IN THE BENEFITS OF THIS SETTLEMENT AND WILL BE BOUND BY ITS TERMS UNLESS YOU EXCLUDE YOURSELF FROM THE CLASS.**

Each member of the Class shall be bound by all determinations and judgments of the Court in connection with the Settlement, whether favorable or unfavorable, unless such Class Member shall mail, by first class mail, sufficient postage prepaid, a written request for exclusion from the Class, **postmarked no later than November 2, 2018**, addressed to the Settlement Administrator at: Juno Therapeutics Securities Litigation, Exclusions, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217. Such request for exclusion shall be in a form that sufficiently identifies (1) the name and address of the person(s) or entity seeking exclusion, and (2) a list of all transaction(s) involving Juno common stock during the period June 4, 2016 through November 22, 2016, including the number of shares, principal amount and trade date of each purchase and sale. A request for exclusion shall not be effective unless submitted within the time and in the form and manner provided for herein. **You cannot exclude yourself by telephone, email or fax.**

**If a person or entity who is a Class Member duly requests to be excluded from the Class, such person or entity will not be bound by any orders or judgments entered in respect of the Settlement and shall not be entitled to receive any benefits provided by the Settlement in the event it is finally approved by the Court.**

If a judgment approving the Settlement provided for in the Stipulation is finally entered, all Class Members who have not requested exclusion shall conclusively be deemed to have released and shall thereafter be barred from asserting any of the Released Claims against the Released Parties.

#### **V. STATEMENT OF ATTORNEYS' FEES AND COSTS SOUGHT**

If the proposed Settlement is approved, Class Counsel intend to apply to the Court for an award of attorneys' fees and reimbursement of expenses from the Settlement Fund. Class Counsel will seek no more than 25 percent of the Settlement Amount as fees, plus an additional amount not to exceed \$500,000 as reimbursement for the expenses and costs actually incurred, in prosecuting the Action. Class Counsel believe their intended fee request to be fair and reasonable. Class Counsel have litigated this case on a wholly contingent basis and have received no compensation during the period the case has been pending, while expending considerable time and expense during the Action. Had the case not been successful, Class Counsel would have sustained a considerable financial loss.

In addition, Class Counsel intend to apply to the Court on behalf of the Court-appointed Class Plaintiffs for reimbursement from the Settlement Fund of their reasonable time, costs and expenses directly relating to their representation of the Class. Class Counsel will seek no more than \$10,000 for each Class Plaintiff.

#### **VI. THE FINAL APPROVAL HEARING**

The Final Approval Hearing shall be held before Honorable Ricardo S. Martinez on November 16, 2018, at 11:00 a.m., in Courtroom Suite 13134 of the U.S. District Court for the Western District of Washington, 700 Stewart Street, Seattle, WA 98101-9906, to determine: (1) whether the proposed Settlement of the Class's claims against the Defendants for \$24,000,000.00 should be approved as fair, reasonable and adequate; (2) whether the proposed Plan of Allocation is fair, just, reasonable, and adequate; (3) whether the Court should permanently enjoin the assertion of any claims that arise from or relate to the subject matter of the Action; (4) whether the Action should be dismissed with prejudice against the Defendants as set forth in the Stipulation of Settlement filed with the Court; (5) whether the application by Class Counsel for an award of attorneys' fees and expenses should be approved; and (6) whether the Class Plaintiffs' application for reimbursement of costs and expenses should be granted.

***The Final Approval Hearing may be adjourned or continued from time to time by the Court without further notice to the Class other than an announcement at such Final Approval Hearing or at any adjournment or continuance thereof.***

Any Class Member who does not timely and validly request exclusion from the Class and who objects to the Settlement, the adequacy of the representation provided by Class Plaintiffs and Class Counsel, the proposed Plan of Allocation of the Net Settlement Fund, the Final Order and Judgment contemplated by the Stipulation, the application for attorneys' fees and reimbursement of expenses, and/or the application for the reimbursement of the reasonable costs and expenses of the Class Plaintiffs, or who otherwise wishes to be heard with respect to any of the foregoing, may appear in person or by attorney at the Final Approval Hearing, at his or her own

expense, and present any evidence or argument that may be proper and relevant. However, no person shall be heard, and no papers, briefs, pleadings or other documents submitted by any such person shall be considered by the Court unless, no later than November 2, 2018, (1) a notice of the person's intention to appear, (2) a statement of such person's objections to any matter before the Court, and (3) the grounds for such objections or the reason for such person's request to appear and to be heard, as well as the information requested in Section IV herein and all other documents and writings which such person desires the Court to consider, shall be filed by such person with the Clerk of the Court, and, on or before such filing, shall be delivered by hand, overnight mail or by certified mail, return-receipt requested, sufficient postage prepaid, upon each of the following counsel of record:

Leigh Handelman Smollar, Esq.  
POMERANTZ LLP  
Ten South La Salle St., Ste. 3505  
Chicago, Illinois 60603  
*Class Counsel*

Daniel Slifkin, Esq.  
CRAVATH, SWAINE & MOORE LLP  
825 Eighth Avenue  
New York, New York 10019  
*Defendants' Counsel*

Any person or entity who fails to object in the manner prescribed in the paragraph immediately above shall be deemed to have waived any objections that person may have and shall be barred from raising such objections in this or any other action or proceeding. Objections directed solely to the proposed Plan of Allocation, attorneys' fees and expenses, or awards to the Class Plaintiffs will not affect the finality of either the Settlement or the Judgment to be entered thereto, if the Settlement is approved by the Court.

All Class Members who do not request exclusion therefrom, in the manner provided herein, will be represented by Class Counsel in connection with the Settlement, but may, if they so desire, also enter an appearance through counsel of their own choice and at their own expense.

## **VII. PROOF OF CLAIM AND RELEASE FORM**

*To be eligible to receive a cash distribution from the Settlement Fund, you must timely complete, sign and file a Proof of Claim and Release Form ("Proof of Claim").* A Proof of Claim is annexed to this Notice. You may receive more than one copy of this Notice and the Proof of Claim, but you should **submit only one Proof of Claim** for each differently named account or ownership, such as an individual account, an IRA account, a joint account, a custodial account, etc.

The Proof of Claim (1) **must** be completed in accordance with the Instructions on the Proof of Claim, (2) **must** enclose all documentation required by the Instructions, and (3) **must** be filed with the Court-appointed Settlement Administrator **postmarked on or before November 6, 2018** at *Juno Therapeutics Securities Litigation*, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173051, Milwaukee, WI 53217.

A Proof of Claim will be deemed filed when mailed via first-class mail, sufficient postage prepaid.

Class Members who do not exclude themselves from the Class and who fail to submit a valid and timely Proof of Claim will nevertheless be bound by the Settlement if finally approved, and all orders and judgments entered by the Court in connection therewith.

By Order of the Court, the Proof of Claim provides for and requires a Release of all Released Claims as described in Section II, above, by all Class Members who file Proofs of Claim. The Release will become effective on the Effective Date of the Settlement.

Each person or entity submitting a Proof of Claim thereby submits to the jurisdiction of the Court for purposes of the Litigation, the Settlement and any proceedings relating to such Proof of Claim, and agrees that such a filed Proof of Claim will be subject to review and further inquiry as to such person's or entity's status as a member of the Class and the allowable amount of the claim.

If you would like acknowledgment of the receipt of your Proof of Claim by the Settlement Administrator, please send it by certified mail, return requested, or its equivalent. **No other formal acknowledgment will be provided, and you will bear all risks of delay or non-delivery of your claim.**

## **VIII. SPECIAL NOTICE TO BROKERS AND OTHER NOMINEES**

Brokerage firms, banks, financial institutions and other nominees ("Nominees") who, during the Class Period, purchased or sold Juno common stock in the name of the Nominees on behalf of beneficial owners who may be Class Members, **must** within ten (10) days after you receive this Notice, either: (1) send a copy of this Notice by First-Class Mail to all such Persons; or (2) provide a list of the names and addresses of such Persons to the Settlement Administrator at *Juno Therapeutics Securities Litigation*, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 170500, Milwaukee, WI 53217. The Settlement Administrator will then cause the Notice and the Proof of Claim to be mailed promptly to said beneficial owners.

If you choose to mail the Notice and Proof of Claim yourself, you may obtain from the Settlement Administrator (without cost to you) as many additional copies of these documents as you will need to complete the mailing. Regardless of whether you choose to complete the mailing yourself or elect to have the mailing performed for you, you may obtain reimbursement for or advancement of reasonable administrative costs actually incurred or expected to be incurred in connection with forwarding the Notice and which would not have been incurred but for the obligation to forward the Notice, upon submission of appropriate documentation to the Settlement Administrator.

**IX. FURTHER INFORMATION**

This Notice merely provides a brief summary of the Action and the proposed Settlement and is qualified by and subject in all respects to the full terms and conditions in the Stipulation. For a more detailed statement of the matters involved in the Action, you should refer to the pleadings, the Stipulation, and the orders entered by the Court and to the other papers filed in the Action. The records in the Action may be examined and copied at any time during regular office hours, and subject to customary copying fees, at the Clerk of the Court, U.S. District Court for the Western District of Washington. In addition, all of the Settlement documents, including the Stipulation, this Notice, the Proof of Claim form and proposed Judgments may be obtained by viewing the website at [www.junotherapeuticslitigation.com](http://www.junotherapeuticslitigation.com), or contacting the Settlement Administrator at *Juno Therapeutics Securities Litigation*, Settlement Administrator, c/o A.B. Data, Ltd., P.O. Box 173051, Milwaukee, WI 53217, Phone: 800-329-4562.

In addition, you may contact Leigh Handelman Smollar, Esq., Pomerantz LLP, 10 South LaSalle Street, Suite 3505, Chicago, IL 60603, 312-377-1181, if you have any questions about the Action or the Settlement.

**INQUIRIES SHOULD NOT BE DIRECTED TO THE COURT, THE CLERK'S OFFICE, DEFENDANTS, OR DEFENDANTS' COUNSEL.**

Dated: August 22, 2018

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

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