

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**IN RE MULLEN AUTOMOTIVE,  
INC. SECURITIES LITIGATION**

Case No. 2:22-cv-03026-DMG-AGR

Honorable Dolly M. Gee

**[PROPOSED] ORDER APPROVING  
PLAN OF ALLOCATION**

1 This matter came on for hearing on June 20, 2025 (the “Settlement Hearing”)  
2 on Lead Plaintiff’s motion to determine whether the proposed plan of allocation of  
3 the Net Settlement Fund (“Plan of Allocation”) created by the Settlement achieved in  
4 the above-captioned class action (the “Action”) should be approved. The Court  
5 having considered all matters submitted to it at the Settlement Hearing and otherwise;  
6 and it appearing that notice of the Settlement Hearing substantially in the form  
7 approved by the Court was mailed or emailed to all Settlement Class Members who  
8 or which could be identified with reasonable effort, and that a summary notice of the  
9 hearing substantially in the form approved by the Court was published in *Investor’s*  
10 *Business Daily* and was transmitted over the *PR Newswire* pursuant to the  
11 specifications of the Court; and the Court having considered and determined the  
12 fairness and reasonableness of the proposed Plan of Allocation,

13 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

14 1. This Order incorporates by reference the definitions in the Stipulation  
15 and Agreement of Settlement dated August 14, 2024 (ECF No. 91-1) (the  
16 “Stipulation”) and all capitalized terms not otherwise defined herein shall have the  
17 same meanings as set forth in the Stipulation.

18 2. The Court has jurisdiction to enter this Order approving the proposed  
19 Plan of Allocation, and over the subject matter of the Action and all parties to the  
20 Action, including all Settlement Class Members.

21 3. Notice of Lead Plaintiff’s motion for approval of the proposed Plan of  
22 Allocation was given to all Settlement Class Members who could be identified with  
23 reasonable effort. The form and method of notifying the Settlement Class of the  
24 motion for approval of the proposed Plan of Allocation satisfied the requirements of  
25 Rule 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation  
26 Reform Act of 1995 (15 U.S.C. § 78u-4(a)(7)), due process, and all other applicable  
27 law and rules, constituted the best notice practicable under the circumstances, and  
28 constituted due and sufficient notice to all persons and entities entitled thereto.

