

# Exhibit 8

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*Lead Counsel for Lead Plaintiff  
and the Proposed Settlement Class*

**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

**DECLARATION OF LEAD  
PLAINTIFF MEJGAN MIRBAZ IN  
SUPPORT OF: (1) LEAD  
PLAINTIFF’S MOTION FOR  
FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT AND  
PLAN OF ALLOCATION; AND (2)  
LEAD COUNSEL’S MOTION FOR  
AN AWARD OF ATTORNEYS’  
FEES AND REIMBURSEMENT OF  
LITIGATION EXPENSES**

Hearing Date: June 20, 2025

Hearing Time: 10:00 a.m.

Location: 350 West 1st Street

Courtroom: 8C

1 I, Mejgan Mirbaz, declare as follows:

2 1. I am the Court-appointed Lead Plaintiff in the above-captioned securities  
3 class action (the “Action”).<sup>1</sup> ECF No. 28. I respectfully submit this declaration in  
4 support of: (a) Lead Plaintiff’s forthcoming motion for final approval of the proposed  
5 Settlement and approval of the proposed Plan of Allocation; and (b) Lead Counsel’s  
6 motion for an award of attorneys’ fees and reimbursement of litigation expenses,  
7 including approval of my request to recover the reasonable costs and expenses I  
8 incurred in connection with my representation of the Settlement Class in the  
9 prosecution of this Action.

10 2. I have personal knowledge of the matters set forth herein, as I have been  
11 directly involved in monitoring and overseeing the prosecution of the Action, as well  
12 as the negotiations leading to the Settlement, and I could and would testify  
13 competently to these matters.

14 **I. LEAD PLAINTIFF’S OVERSIGHT OF THE LITIGATION**

15 3. I have out-of-pocket losses of approximately \$284,594 related to my  
16 trading in Mullen Auto common stock during the Settlement Class Period,<sup>2</sup> which was  
17 a significant part of my life savings, earned over 25 years of hard work as a small  
18 business owner while supporting my two children. Accordingly, I was highly  
19 motivated to recover as much money as possible for myself and the Settlement Class.

20 4. By Order dated August 4, 2022, the Court: (a) appointed me to serve as  
21 Lead Plaintiff in the Action; and (b) approved my selection of Glancy Prongay &  
22 Murray LLP (“GPM” or “Lead Counsel”) to serve as lead counsel. ECF No. 28.

23 \_\_\_\_\_  
24 <sup>1</sup> Unless otherwise defined herein, capitalized terms shall have the meanings ascribed  
25 to them in the Stipulation and Agreement of Settlement, dated August 14, 2024 (ECF  
26 No. 91-1).

27 <sup>2</sup> This is the combined total for all accounts under my control, taking into account  
28 purchases and sales of Mullen Auto common stock during the Settlement Class  
Period, and the \$1.22 per share average closing price for Mullen Auto common stock  
during the 90-Day Lookback Period, as discussed in the Plan of Allocation.

1           5.       I am aware of and understand the requirements and responsibilities of a  
2 representative plaintiff in a securities class action, including those set forth in the  
3 Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4. In  
4 fulfillment of my responsibilities as a Lead Plaintiff, I have worked closely with Lead  
5 Counsel regarding the litigation and resolution of this case.

6           6.       Throughout the litigation, I received status reports from Lead Counsel  
7 on case developments and participated in regular discussions concerning the  
8 prosecution of the Action, the strengths of and risks to the claims, and potential  
9 settlement. In particular, I: (a) produced my trading records to my attorneys at GPM;  
10 (b) moved to be appointed Lead Plaintiff in this Action; (c) regularly communicated  
11 with GPM attorneys regarding the posture and progress of the case; (d) reviewed  
12 significant pleadings and briefs filed in this Action; (e) reviewed Court orders and  
13 discussed them with attorneys at GPM; (f) provided documents, and written responses  
14 and objections, to Defendants’ requests for the production of documents; (g)  
15 responded to interrogatories; (h) consulted with my attorneys concerning the  
16 mediation; (i) traveled from my home in Sollentuna, Sweden to Los Angeles,  
17 California to participate in the mediation; and (j) evaluated and approved the proposed  
18 Settlement.

19           7.       In short, I have done my best to vigorously promote the interests of the  
20 Settlement Class and to obtain the largest recovery possible under the circumstances.

21 **II.    APPROVAL OF THE SETTLEMENT**

22           8.       As detailed in the paragraphs above, through my active participation I  
23 was both well-informed of the status and progress of the litigation, and the status and  
24 progress of the settlement negotiations in this Action.

25           9.       Based on my involvement in the prosecution and resolution of the claims  
26 asserted in the Action, I believe that the proposed Settlement provides a fair,  
27 reasonable, and adequate recovery for the Settlement Class, particularly in light of the  
28

1 risks of continued litigation, and I fully endorse approval of the Settlement by the  
2 Court.

3 **III. LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’**  
4 **FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

5 **A. Attorneys’ Fees And Litigation Expenses**

6 10. I believe Lead Counsel’s request for an award of attorneys’ fees in the  
7 amount of 30% of the Settlement Fund is fair and reasonable in light of the work Lead  
8 Counsel performed on behalf of the Settlement Class.

9 11. I have evaluated Lead Counsel’s fee request by considering the quality  
10 and amount of the work performed, the recovery obtained for the Settlement Class,  
11 and the risks Lead Counsel bore in prosecuting this Action on behalf of myself and  
12 the Settlement Class on a fully contingent basis, which included the fronting of all  
13 expenses. I have authorized this fee request for the Court’s ultimate determination.

14 12. I further believe that Lead Counsel’s request for reimbursement of out-  
15 of-pocket litigation expenses in the amount of approximately \$85,280.79 is  
16 reasonable. Based on the foregoing, and consistent with my obligation to the  
17 Settlement Class to obtain the best result at the most efficient cost, I fully support  
18 Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of  
19 litigation expenses.

20 **B. Lead Plaintiff’s Litigation-Related Costs And Expenses**

21 13. I understand that reimbursement of a class representative’s reasonable  
22 costs and expenses is authorized under the PSLRA, 15 U.S.C. § 78u-4(a)(4). For this  
23 reason, in connection with Lead Counsel’s request for Litigation Expenses, I  
24 respectfully request reimbursement for the time that I dedicated to this case directly  
25 relating to my representation of the Settlement Class.

26 14. I am a small business owner, managing and working in a foot and skin  
27 clinic in Sweden, and the time I devoted to representing the Settlement Class in this  
28 Action was time that I otherwise would have spent at my job, investing, or on other

1 activities and, thus, represented a cost to me. I respectfully request reimbursement in  
2 the amount of \$25,000 for the time I devoted to participating in this Action. I make  
3 this request based on the conservative estimate that I spent approximately 60 hours  
4 on the litigation-related activities described above. It is my belief that this request for  
5 reimbursement is fair and reasonable and that the time and effort I devoted to this  
6 litigation was necessary to help achieve an excellent result for the Settlement Class  
7 under the circumstances.

8 **IV. CONCLUSION**

9 15. In conclusion, I strongly endorse the Settlement as fair, reasonable, and  
10 adequate. I appreciate the Court’s attention to the facts presented in my declaration  
11 and respectfully request that the Court approve: (a) Lead Plaintiff’s forthcoming  
12 motion for final approval of the proposed Settlement and the Plan of Allocation; (b)  
13 Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of  
14 litigation expenses; and (c) my request for reimbursement pursuant to the PSLRA.

15 I declare under penalty of perjury under the laws of the United States of  
16 America that the foregoing is true and correct to the best of my knowledge.

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18 Executed on April 1, 2025, in Sollentuna, Sweden.

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22 Meigan Mirbaz  
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