

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

JONNIE HOMYK, et al.,
Plaintiffs,

v.

CHEMOCENTRYX, INC. et al.,
Defendants.

Master File No. 4:21-cv-03343-JST *and related case*, No. 4:21-cv-04357

Judge: Hon. Jon S. Tigar

**NOTICE OF PENDENCY
OF CLASS ACTION**

If you purchased or otherwise acquired the common stock of ChemoCentryx, Inc. from November 26, 2019 through May 6, 2021, inclusive (the “Class Period”), and were damaged thereby a class action lawsuit may affect your rights.

*A federal court authorized this Notice. This is not a solicitation from a lawyer.
Please read this Notice carefully and in its entirety.*

You are receiving this Notice because your rights may be affected by a class action lawsuit pending before the United States District Court for the Northern District of California (the “Court”) against ChemoCentryx, Inc. (“ChemoCentryx” or the “Company”) and its former President and Chief Executive Officer, Dr. Thomas J. Schall. This Notice is intended to advise you that the action has been certified by the Court to proceed as a class action on behalf of certain purchasers of ChemoCentryx common stock and of your rights with respect to the lawsuit.

The Court has not decided whether the Class has been damaged or whether Defendants did anything wrong, and this Notice is not an admission by Defendants or an expression of any opinion of the Court concerning the merits of the lawsuit. There is no settlement or monetary recovery at this time, and there is no guarantee there will be any recovery. However, if you are a Class Member, your legal rights are affected. If you received this Notice in error and you are not a Class Member, you do not need to take any action and your rights will not be affected.

WHAT ARE MY OPTIONS?	
DO NOTHING	Stay in this lawsuit. Await the outcome and share in any recovery that may be achieved. Give up certain rights. By doing nothing, you keep the possibility of sharing in any recovery that may result from a trial or a settlement. But you give up any right you may have to sue Defendants separately about the issues and claims being raised in this lawsuit, and you will be bound by the outcome of this case.
ASK TO BE EXCLUDED BY JANUARY 14, 2025	Get out of this lawsuit. Get no recovery from it. Keep your rights. If you ask to be excluded from this lawsuit, you will not be bound by what the Court does in this case and will keep any right you might have to sue Defendants separately about the same issues and claims being raised in this lawsuit. If a recovery is later awarded in this case, you would not share in that recovery.

1. Why did I get this Notice?

You received this Notice because the Court has certified a Class in this lawsuit, and you were identified as a potential Class Member whose rights may be affected by this lawsuit. This Notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you.

The Court decided that this lawsuit can proceed as a class action because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal district courts. Specifically, the Court found that a sufficient number of investors purchased ChemoCentryx common stock during the Class Period (November 26, 2019 through May 6, 2021, inclusive) and that the claims asserted in the lawsuit are common enough to apply to all of those investors.

You may have legal rights and options to exercise before the Court decides who wins the case. Judge Jon S. Tigar of the United States District Court for the Northern District of California is overseeing this class action. The lawsuit is titled *Homyk v. ChemoCentryx, Inc.*, Master File No. 4:21-cv-03343-JST (the “Action”). More information about why the Court is allowing this lawsuit to proceed as a class action is contained in the Court’s Order Granting Motion to Certify Class, which is available at www.ChemoCentryxSecuritiesLitigation.com.

This Notice provides a summary of the lawsuit. It also describes who is included in the Class, the effect of participating in this lawsuit as a Class Member, and how to request exclusion from the Class, if you wish to do so. If you are a member of the Class, you may be entitled to participate in any benefits that may eventually be obtained for the Class as a result of this lawsuit. There is, however, no assurance that a judgment in favor of the Class will be granted.

2. What is this lawsuit about?

ChemoCentryx is a biopharmaceutical company incorporated under the laws of the State of Delaware, with its corporate headquarters and principal place of business in Thousand Oaks, California. Until October 19, 2022, ChemoCentryx’s common stock traded on the NASDAQ stock exchange under the ticker symbol “CCXI.”

The operative complaint in the Action (the “Complaint”) names as defendants ChemoCentryx and ChemoCentryx’s former President and Chief Executive Officer, Dr. Thomas J. Schall (together, “Defendants”). The Court appointed Indiana Public Retirement System as the Lead Plaintiff and Class Representative for the Class in this lawsuit.

(a) LEAD PLAINTIFF’S CLAIMS

Lead Plaintiff alleges that during the Class Period Defendants made misstatements and omissions to investors about the safety and efficacy of ChemoCentryx’s proprietary vasculitis drug called avacopan (now TAVNEOS®), and the Company’s application for FDA approval of avacopan; that these misstatements and omissions caused the price of ChemoCentryx common stock to be artificially inflated during the Class Period and caused damages to investors when the market later allegedly learned the truth allegedly concealed by Defendants’ misleading statements.

Specifically, Lead Plaintiff alleges violations of Sections 10(b), 20(a), and 20A of the Securities Exchange Act of 1934 (the “Exchange Act”), and U.S. Securities and Exchange Commission Rule 10b-5 promulgated thereunder, claiming, among other things, that Defendants defrauded investors in ChemoCentryx common stock through their alleged misrepresentations concerning ChemoCentryx’s ADVOCATE study, the Company’s Phase 3 clinical trial of avacopan, and concerning the Company’s communications with the FDA related to the approval of avacopan. Lead Plaintiff further asserts claims under

Sections 20(a) and 20A of the Exchange Act against Defendant Schall. Specifically, Lead Plaintiff alleges that Defendant Schall controlled ChemoCentryx when he made the alleged misstatements concerning avacopan in violation of Section 20(a); and that Schall sold ChemoCentryx stock while in possession of material non-public information about avacopan, and that Lead Plaintiff and other Class Members purchased ChemoCentryx stock contemporaneously with those sales, in violation of Section 20A.

(b) DEFENDANTS' DENIAL OF LIABILITY

Defendants deny Lead Plaintiff's allegations in full and deny any wrongdoing or liability for the claims alleged. Defendants maintain that the trial design was appropriate and that the FDA was fully informed about the trial and approved its design prior to the trial's commencement. Defendants further maintain that the market was aware of the trial design and the risks inherent in drug approval and that in any event the FDA approved avacopan (TAVNEOS®) based on the ADVOCATE trial. Defendants deny that they made any false or misleading statements violating the federal securities laws, that they knew or believed that their statements were inaccurate, or that the price of ChemoCentryx common stock was artificially inflated during the Class Period. Defendants further deny that the declines in the price of ChemoCentryx common stock were caused by the disclosure of any wrongdoing or liability on the part of Defendants, or that any Class Member sustained damages recoverable under the federal securities laws.

3. What has happened so far?

The initial complaint in this action was filed on May 5, 2021. On January 28, 2022, the Honorable Jon S. Tigar appointed Indiana Public Retirement System as Lead Plaintiff and Bernstein Litowitz Berger & Grossmann LLP as Lead Counsel for the potential Class.

On March 28, 2022, Lead Plaintiff filed the Amended Consolidated Class Action Complaint (the "Complaint"). Defendants moved to dismiss the Complaint on May 19, 2022. On February 23, 2023, the Court issued an order granting in part and denying in part Defendants' motion to dismiss. Defendants filed their Answer to the Complaint on April 27, 2023.

On August 25, 2023, Lead Plaintiff filed a motion for class certification. After full briefing and a hearing, on March 6, 2024, Judge Tigar issued an Order granting the motion and certifying the Class. Copies of (i) the Complaint, (ii) the Order Granting in Part and Denying in Part Motion to Dismiss, (iii) Defendants' Answer, and (iv) the Order Granting Motion to Certify Class are available at www.ChemoCentryxSecuritiesLitigation.com.

The parties are currently engaged in discovery. The deadline for completing fact discovery was August 7, 2024 and the deadline for completing expert discovery is December 13, 2024. The parties must file motions for summary judgment by March 20, 2025. Trial is scheduled for September 22, 2025. Those deadlines and dates are subject to change in the future.

As noted above, the Court has not decided whether Lead Plaintiff or Defendants are correct and there has been no monetary recovery. By certifying the Class and issuing this Notice, the Court is not suggesting who will win or lose this case. No money is available now because the Court has not yet decided whether Defendants did anything wrong.

There is no guarantee that monetary recovery will ever be obtained. If there is a recovery or settlement, you will be sent a later notice with information about how to ask for your share.

4. Who is included in the Class?

By Order dated March 6, 2024, the Court certified the following Class:

All persons who purchased or otherwise acquired the common stock of ChemoCentryx between November 26, 2019 and May 6, 2021, inclusive, and were damaged thereby.

Excluded from the Class by definition are:

Defendants and their immediate families, the officers and directors of the Company at all relevant times, members of their immediate families, and Defendants' legal representatives, heirs, successors, or assigns, and any entity in which Defendants have or had a controlling interest.

The ruling by the Court certifying the Class does not address the merits of this litigation. Rather, the certification of the Class means only that the ultimate outcome of the Action—whether favorable or unfavorable to the Class or Defendants—will apply to each Class Member who does not timely elect to be excluded from the Class.

If you are not sure whether you are included in the Class, you can obtain additional information at www.ChemoCentryxSecuritiesLitigation.com or by contacting the lawyers who were appointed Class Counsel in this case at the address set forth below.

YOUR RIGHTS AND OPTIONS

If you are a Class Member, you have the right to decide whether to stay in the Class or ask to be excluded from the Class. If you are a member of the Class and wish to be excluded from the Class, you must request exclusion in accordance with the procedure set forth in question 7 below.

5. What happens if I am a Class Member and I do nothing?

If you are a Class Member and do nothing, you will be legally bound by all determinations, orders, and judgments that the Court makes in the Action, whether favorable or unfavorable. You do not have to do anything now (other than retain your records in ChemoCentryx common stock, as detailed below) if you want to keep the possibility of obtaining money or any other benefits from this lawsuit. By doing nothing, you are staying in the Class.

If you stay in the Class and Lead Plaintiff obtains money as a result of a court ruling or a settlement, you will be notified about how to apply for your share. Keep in mind that if you do nothing now, regardless of whether Lead Plaintiff wins or loses the case, you will not be able to sue Defendants—as part of any other lawsuit—regarding the same or similar factual circumstances and legal claims that are the subject of this lawsuit.

If you choose to remain a member of the Class, you do not need to do anything at this time other than to retain documentation of your transactions in ChemoCentryx common stock. Should there be a recovery in the future, members of the Class will be required to support their requests to participate in the distribution of any such recovery by demonstrating their membership in the Class and documenting their purchases and sales of ChemoCentryx common stock and their resulting damages. **For this reason, please be sure to keep all records of your transactions in ChemoCentryx common stock. DO NOT mail them to Class Counsel or the Notice Administrator at this time.**

6. If I am a Class Member, why would I ask to be excluded?

If you want to pursue your own lawsuit or claims against Defendants regarding the conduct in this case, do not want to be bound by what the Court does in this case, or if you simply do not want to be part of the Class pursuing claims against Defendants, you need to ask to be excluded from the Class. If you exclude yourself from the Class—which also means to remove yourself from the Class and is sometimes called “opting out” of the Class—you will not be legally bound by the Court’s judgments in this class action and will keep any right you may have to sue (or continue to sue) Defendants regarding the claims being made in the case.

If you exclude yourself, you will not get any money or any other recovery from this lawsuit, if there is any. If you start your own lawsuit against Defendants after you exclude yourself, you may have to hire and pay your own lawyer for that lawsuit, and you will have to prove your claims. If you do exclude yourself, you should talk to your own lawyer soon, because your claims may be limited by time and subject to a statute barring your claims for lack of timeliness.

7. How do I ask the Court to exclude me from the Class?

If you wish to be excluded from the Class, you must send a letter stating that you “request exclusion from the Class in *Homyk v. ChemoCentryx, Inc.*, Master File No. 4:21-cv-03343-JST.” Your request must: (i) state the name, address, and telephone number of the person or entity requesting exclusion; and (ii) include a signature of the person or entity requesting exclusion or an authorized representative.

You must mail your exclusion request, **postmarked by no later than January 14, 2025**, to the Notice Administrator, Kroll Settlement Administration, at the following address:

ChemoCentryx Securities Litigation
EXCLUSIONS
c/o Kroll Settlement Administration
P.O. Box 5013
New York, NY 10150-5013

You cannot exclude yourself from the Class by telephone or by email, and a request for exclusion will not be effective unless it contains all of the information called for by this paragraph and is postmarked by the date stated above, or is otherwise accepted by the Court.

Only request exclusion if you do NOT wish to participate in the Class Action and do NOT wish to share in any potential recovery that the Class may obtain.

8. Who are the lawyers representing the Class?

As a member of the Class, you will be represented by Class Counsel, Bernstein Litowitz Berger & Grossmann LLP. You may contact Class Counsel as follows:

Abe Alexander, Esq.
BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
1251 Avenue of the Americas
New York, NY 10020
1-800-380-8496

Unless you elect to retain your own personal lawyer, by remaining in the Class you will not subject yourself to any direct obligations to pay the costs of the litigation. In the event there is a recovery by the Class, all costs and expenses, including Class Counsel’s attorneys’ fees, will be paid from that recovery in an amount approved by the Court. If there is no recovery, Class Counsel will not receive any attorneys’ fees.

9. Can I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. However, you have the right to retain your own personal counsel at your own expense. If you retain separate counsel to represent you in the Class Action, your counsel must enter an appearance on your behalf by filing a Notice of Appearance with the Court and mailing it to Class Counsel at the address set forth above on or before January 14, 2025, as well as all other counsel of record.

10. How can I get more information?

This Notice contains only a summary of the litigation and your rights as a potential Class Member. For more detailed information regarding the matters involved in this litigation, please refer to the papers on file in this Action, which may be inspected, during business hours, at the Clerk of the Court for the United States District Court for the Northern District of California, Ronald V. Dellums Federal Building & United States Courthouse, 1301 Clay Street, Suite 400S, Oakland, CA 94612. In addition, important documents in the case have been posted on the following website: www.ChemoCentryxSecuritiesLitigation.com. Inquiries regarding this litigation may be addressed to the Class Counsel listed in question 8 above.

11. What if my address has changed?

If this Notice was mailed to you at an old address, or if you move, please advise the Notice Administrator of your current address so that you can receive any future notices. The Notice Administrator can be reached at *ChemoCentryx Securities Litigation*, c/o Kroll Settlement Administration, P.O. Box 5013, New York, NY 10150-5013. If you are not a Class Member, you may discard this Notice.

NOTICE TO BROKERS AND CUSTODIANS

If, during the period from November 26, 2019 through May 6, 2021, inclusive, you purchased or acquired ChemoCentryx common stock for the beneficial interest of persons or organizations other than yourself, you must either: (i) within seven (7) calendar days of receipt of this Notice, request from the Notice Administrator sufficient copies of the Notice to forward to all such beneficial owners and within seven (7) calendar days of receipt of those Notices forward them to all such beneficial owners; or (ii) within seven (7) calendar days of receipt of this Notice, email a list of the names, addresses, and, if available, email addresses of all such beneficial owners to the Notice Administrator at info@ChemoCentryxSecuritiesLitigation.com.

If you choose the first option, you must send a statement to the Notice Administrator confirming that the mailing was made and **you must retain your mailing records for use in connection with any further notices that may be provided in the Action**. If you choose the second option, the Notice Administrator will send a copy of the Notice to the beneficial owners. Upon full and timely compliance with these directions, such nominees may seek reimbursement of their reasonable expenses actually incurred by providing the Notice Administrator with proper documentation supporting the expenses for which reimbursement is sought. Copies of this Notice may also be obtained from www.ChemoCentryxSecuritiesLitigation.com, or by calling the Notice Administrator toll free at 833-522-2606.

DATED: NOVEMBER 15, 2024

BY ORDER OF THE
UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA