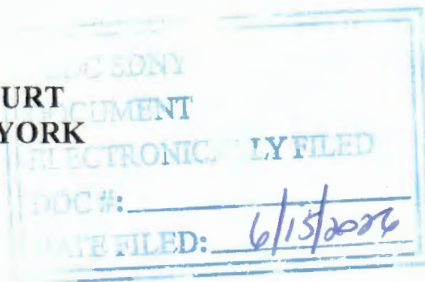


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



MARK LEONE, Individually and on Behalf
of All Others Similarly Situated,
Plaintiff,

v.

ASP ISOTOPES INC., PAUL E. MANN,
and HEATHER KIESSLING,

Defendants.

MEMO ENDORSED

C.A. No. 1:24-cv-9253-CM

Plaintiff must file a motion for preliminary approval of the settlement by July 7, 2026. If no such motion is timely filed, the parties must file a report with the court explaining why. The court will then set a date for filing such a motion.

Colleen M. Kelly

6/15/2026

JOINT STATUS REPORT REGARDING SETTLEMENT

Lead Plaintiff Mark Leone ("Plaintiff"), Defendant ASP Isotopes Inc. ("ASPI"), and Defendant Paul Mann ("Mann," together with ASPI, "Defendants," and together with Plaintiff, the "Parties"), by and through their undersigned counsel, jointly write to update the Court regarding their agreement in principle to resolve all claims in this action, pursuant to the Joint Stipulation and Order Staying All Proceedings Pending Settlement which the Court so-ordered on April 6, 2026. *See* ECF No. 85.

The Parties have been diligently negotiating the Stipulation and Agreement of Settlement and several documents related thereto, including the proposed Preliminary Approval Order, Long Notice, Summary Notice, Postcard Notice, Claim Form, Judgment, and Supplemental Agreement. These documents are subject to review by several constituencies, including Defendants' D&O Carriers. Plaintiff has also consulted with a damages expert to draft the proposed plan of allocation, and retained a claims administrator (subject to Court approval) after a competitive bidding process.

Having met and conferred, the Parties believe that additional time is needed to complete and finalize the settlement documentation and related materials necessary for the filing of the Motion for Preliminary Approval. The Parties anticipate being able to file the Motion for Preliminary Approval by Tuesday July 7, 2026. Accordingly, the Parties respectfully request that the Court order Plaintiff to file the Motion for Preliminary Approval by July 7, 2026, or, if the Parties are unable to meet that deadline, that the Parties jointly provide the Court with a status update at that time.

Dated: June 5, 2026

**GLANCY PRONGAY WOLKE &
ROTTER LLP**

By: /s/ Garth Spencer

Garth Spencer (GS-7623)
Joseph D. Cohen (*pro hac vice*)
Amir A. Soleimanpour (*pro hac vice*)
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
gspencer@glancylaw.com
jcohen@glancylaw.com
asoleimanpour@glancylaw.com

John C. Roberts Jr. (*pro hac vice*)
P.O. Box 10249
Bainbridge Island, WA 98110
Telephone: (312) 961-8832
jroberts@glancylaw.com

*Counsel for Plaintiff Mark Leone and the
Class*

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Michael D. Blanchard

Michael D. Blanchard
Christopher M. Wasil
One State Street Hartford, CT 06103
(860) 240-2700
michael.blanchard@morganlewis.com
christopher.wasil@morganlewis.com

Michael L. Kichline
Laura Hughes McNally
Karen Pieslak Pohlmann
2222 Market Street
Philadelphia, PA 19103
(215) 963-5000
michael.kichline@morganlewis.com
laura.mcnally@morganlewis.com
karen.pohlmann@morganlewis.com

Brian A. Herman
101 Park Avenue
New York, NY 10178
(212) 309-6000
brian.herman@morganlewis.com

*Attorneys for Defendants ASP Isotopes Inc.
and Paul E. Mann*

SO ORDERED.

DATED: _____, 2026

The Honorable Colleen McMahon
United States District Court Judge