

The Honorable Thomas S. Zilly

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

ANTONIO BACHAALANI NACIF, WIES  
RAFI, and HANG GAO, individually and on  
behalf of all other similarly situated,

*Plaintiffs,*

v.

ATHIRA PHARMA, INC., and LEEN  
KAWAS, Ph.D.,

*Defendants.*

No. 2:21-cv-00861-TSZ

**SUPPLEMENTAL DECLARATION OF  
JULI E. FARRIS ON IN FURTHER  
SUPPORT OF CONTRIBUTING  
COUNSEL’S MOTION FOR AN  
AWARD OF ATTORNEYS’ FEES AND  
REIMBURSEMENT OF EXPENSES**

I, Juli E. Farris, declare:

1. I am a partner at Keller Rohrback L.L.P. (“Keller Rohrback”) and I make this Declaration of my own personal knowledge.

2. I submit this supplemental declaration in further support of Longman Law, P.C. (“Longman Law”) and Keller Rohrback’s (together, “Contributing Counsel”) Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses in connection with making a lead plaintiff motion in the above-captioned action (the “Action”).

3. In their Opposition to Contributing Counsel’s Motion, *see* Opp. at 4, Lead Counsel make several misplaced assertions that require clarification.

1           4.       Contributing Counsel have no undisclosed fee arrangements. The Motion itself  
2 discloses the only arrangement that exists, as it reflects the award that each firm requests and will  
3 receive if the Court approves. No other arrangement exists between the two firms, or with anyone  
4 else, applicable to this request.

5           5.       While Lead Counsel correctly surmises that Plaintiffs Timothy and Tai Slyne are  
6 relatives of Mr. Longman's former law partner Patrick Slyne (both are former partners of Stull,  
7 Stull and Brody), and that Mr. Slyne represented other plaintiffs in a separate litigation, the  
8 insinuation that the referral was the product of a hidden financial agreement is both presumptuous  
9 and false. In my experience, lawyers commonly refer clients, particularly family members, to  
10 other professionals whom they trust and respect when the opportunity presents itself. I am not  
11 aware of any financial arrangement attached to this referral, and have confirmed with Mr.  
12 Longman, in response to Lead Counsel's insinuation, that none exists. Mr. Slyne has neither  
13 requested nor received any compensation or promise of compensation from Longman Law or  
14 Keller Rohrback. Neither Longman Law nor Keller Rohrback has received any compensation or  
15 promise of compensation from Mr. Slyne in connection with the *Bushanksy* case referenced by  
16 Lead Counsel.


17           6.       Lead Counsel's presumption that the Slynies' failure to timely file their claims  
18 evidences their lack of interest in the lawsuit is similarly misplaced. Without disclosing client  
19 confidences, I have been advised by Mr. Longman that any delay in the submission of their claims  
20 was the result of miscommunications and pressing family matters that required their attention.  
21 Mr. Longman has confirmed that Mr. Slyne has since submitted his claim to the Settlement  
22 Administrator.

23           7.       Given these facts, it should not be necessary to interrogate Mr. Longman about  
24 "these relationships, the existence of any fee arrangements or whether he was working together  
25 in some manner with counsel in related actions," as Lead Counsel suggests. Opp. at 4. Moreover,  
26 it is unfair and inappropriate for Lead Counsel to suggest it. Mr. Longman is unable to attend  
27 the October 25, 2024, hearing because it is scheduled on a Jewish holiday that Mr. Longman

1 observes. Mr. Longman advised Co-Lead Counsel Casey Sadler of his unavailability, and the  
2 reason for it, during a telephone call several weeks ago. Although Mr. Longman advises that he  
3 deeply regrets that he is unable to attend the hearing in person, he was reluctant to request any  
4 accommodation, given that notice of the scheduled hearing had already been provided to class  
5 members. As his local co-counsel, I plan to attend the hearing in his place.

6 I declare under penalty of perjury that the foregoing is true and correct.

7  
8 Executed on October 18, 2024.

  
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Juli E. Farris