

1 Robert V. Prongay (SBN 270796)  
rprongay@glancylaw.com

2 Charles Linehan (SBN 307439)  
clinehan@glancylaw.com

3 Pavithra Rajesh (SBN 323055)  
prajesh@glancylaw.com

4 GLANCY PRONGAY & MURRAY LLP  
5 1925 Century Park East, Suite 2100  
6 Los Angeles, California 90067  
7 Telephone: (310) 201-9150  
Facsimile: (310) 201-9160

8 *Attorneys for Plaintiff Meysam Moradpour*

9 [Additional Counsel on Signature Page]

10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 MEYSAM MORADPOUR, Individually and  
13 On Behalf of All Others Similarly Situated,

14 Plaintiff,

15 v.

16 VELODYNE LIDAR, INC., ANAND  
17 GOPALAN, and ANDREW HAMER,

18 Defendants.

Case No.

**CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF THE FEDERAL  
SECURITIES LAWS**

JURY TRIAL DEMANDED

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1 Plaintiff Meysam Moradpour (“Plaintiff”), individually and on behalf of all others similarly  
2 situated, by and through his attorneys, alleges the following upon information and belief, except as  
3 to those allegations concerning Plaintiff, which are alleged upon personal knowledge. Plaintiff’s  
4 information and belief is based upon, among other things, his counsel’s investigation, which  
5 includes without limitation: (a) review and analysis of regulatory filings made by Velodyne Lidar,  
6 Inc. (“Velodyne” or the “Company”) with the United States (“U.S.”) Securities and Exchange  
7 Commission (“SEC”); (b) review and analysis of press releases and media reports issued by and  
8 disseminated by Velodyne; and (c) review of other publicly available information concerning  
9 Velodyne.

10 **NATURE OF THE ACTION AND OVERVIEW**

11 1. This is a class action on behalf of persons and entities that purchased or otherwise  
12 acquired Velodyne securities between November 9, 2020 and February 19, 2021, inclusive (the  
13 “Class Period”). Plaintiff pursues claims against the Defendants under the Securities Exchange Act  
14 of 1934 (the “Exchange Act”).

15 2. Velodyne provides solutions to develop safe automated systems including real-time  
16 surround view lidar sensors. The Company became a public entity on or about September 29, 2020  
17 when it merged with Graf Industrial Corp., a special purpose acquisition company.

18 3. On February 22, 2021, Velodyne announced that the Board had “removed David Hall  
19 as Chairman of the Board and terminated Marta Hall’s employment as Chief Marketing Officer of  
20 the Company” after the Audit Committee’s investigation “concluded that Mr. Hall and Ms. Hall  
21 each behaved inappropriately with regard to certain Board and Company processes, and failed to  
22 operate with respect, honesty, integrity, and candor in their dealings with Company officers and  
23 directors.” In addition, the Company announced that Velodyne’s Board formally censured Mr. Hall  
24 and Ms. Hall, but that they would remain directors of Velodyne.

25 4. On this news, Velodyne’s common stock fell \$3.14, or approximately 15%, to close  
26 at \$17.97 per share on February 22, 2021, on unusually heavy trading volume. Additionally,  
27 Velodyne’s warrants fell \$1.47, or approximately 20%, to close at \$5.90 per warrant on February  
28 22, 2021.



1 **PARTIES**

2 11. Plaintiff Meysam Moradpour, as set forth in the accompanying certification,  
3 incorporated by reference herein, purchased Velodyne securities during the Class Period, and  
4 suffered damages as a result of the federal securities law violations and false and/or misleading  
5 statements and/or material omissions alleged herein.

6 12. Defendant Velodyne is incorporated under the laws of Delaware with its principal  
7 executive offices located in San Jose, California. Velodyne’s common stock trades on the NASDAQ  
8 exchange under the symbol “VLDR” and its warrants trade under the symbol “VLDRW.”

9 13. Defendant Anand Gopalan (“Gopalan”) was the Company’s Chief Executive Officer  
10 (“CEO”) at all relevant times.

11 14. Defendant Andrew Hamer (“Hamer”) was the Company’s Chief Financial Officer  
12 (“CFO”) at all relevant times.

13 15. Defendants Gopalan and Hamer (collectively the “Individual Defendants”), because  
14 of their positions with the Company, possessed the power and authority to control the contents of  
15 the Company’s reports to the SEC, press releases and presentations to securities analysts, money  
16 and portfolio managers and institutional investors, i.e., the market. The Individual Defendants were  
17 provided with copies of the Company’s reports and press releases alleged herein to be misleading  
18 prior to, or shortly after, their issuance and had the ability and opportunity to prevent their issuance  
19 or cause them to be corrected. Because of their positions and access to material non-public  
20 information available to them, the Individual Defendants knew that the adverse facts specified  
21 herein had not been disclosed to, and were being concealed from, the public, and that the positive  
22 representations which were being made were then materially false and/or misleading. The  
23 Individual Defendants are liable for the false statements pleaded herein.

24 **SUBSTANTIVE ALLEGATIONS**

25 **Background**

26 16. Velodyne provides solutions to develop safe automated systems including real-time  
27 surround view lidar sensors. The Company became a public entity on or about September 29, 2020  
28 when it merged with Graf Industrial Corp., a special purpose acquisition company.

1 **Materially False and Misleading**

2 **Statements Issued During the Class Period**

3 17. The Class Period begins on November 9, 2020. On that day, the Company filed its  
4 quarterly report on Form 10-Q with the SEC for the period ended September 30, 2020 (the “3Q20  
5 10-Q”). It stated: “Based on the evaluation of our disclosure controls and procedures as of the end  
6 of the period covered by this Quarterly Report on Form 10-Q, our chief executive officer and chief  
7 financial officer concluded that, as of such date, our disclosure controls and procedures were  
8 effective at the reasonable assurance level.”

9 18. Moreover, the 3Q20 10-Q contained certifications pursuant to the Sarbanes-Oxley  
10 Act of 2002 (“SOX”) signed by defendants Gopalan and Hamer attesting to the accuracy of  
11 Velodyne’s financial statements, the effectiveness of the Company’s internal controls over financial  
12 reporting, and the disclosure of all fraud.

13 19. On January 7, 2021, the Company announced its preliminary fourth quarter and full  
14 year 2020 financial results in a press release that stated, in relevant part:

- 15
- 2020 annual revenue of approximately \$94 million
  - 16 • Record shipments of 4,100 units
  - 17 • \$350 million of cash on the balance sheet at December 31, 2020
  - 18 • Long-term outlook remains strong, but at this time 2021 guidance withdrawn  
19 due to reduced near-term visibility

20 Velodyne Lidar (NASDAQ: VLDR, VLDRW), the global leader in lidar technology  
21 founded by David Hall with foundational patents, today announced preliminary  
22 fourth quarter 2020 revenue and provided an update on recent business trends and  
23 outlook. During the fourth quarter of 2020, Velodyne shipped more than 4,100  
24 sensors to its global customer base, bringing the annual total units shipped in 2020  
25 to more than 11,500, including over 600 solid state Velarray units in the fourth  
26 quarter alone. These unit amounts represent a single quarter record for Velodyne,  
27 and the company believes that it has sold more sensors in 2020 than reported by all  
28 of its competitors combined. Additionally, Velodyne increased its signed and  
awarded contracts to 25 and expanded its pipeline to 183 projects across multiple  
end-markets and use cases, up from 175 since the end of the third quarter of 2020.

20. On January 13, 2021, Velodyne filed a Form 8-K with the SEC stating that David  
Hall had “voluntarily transitioned from serving as an employee and executive officer of the  
Company to a non-executive role.”



1 December 2020. The investigation was aided by independent legal counsel, Keker,  
2 Van Nest & Peters LLP, and reviewed certain statements and conduct by David Hall  
3 and Marta Thoma Hall. The investigation concluded that Mr. Hall and Ms. Hall each  
4 behaved inappropriately with regard to Board and Company processes, and failed to  
5 operate with respect, honesty, integrity, and candor in their dealings with Company  
6 officers and directors. Accordingly, the Board approved remedial actions including  
7 the removal of Mr. Hall as Chairman of the Board and the termination of Ms. Hall  
8 as an employee of the Company. Mr. Hall had previously informed the Board that he  
9 was voluntarily transitioning from Executive Chairman to Chairman on January 7,  
10 2021. The Board also formally censured both Mr. Hall and Ms. Hall, and directed  
11 them both to receive appropriate remedial training. They will remain members of the  
12 Company's Board of Directors.

13 25. On this news, Velodyne's common stock fell \$3.14, or approximately 15%, to close  
14 at \$17.97 per share on February 22, 2021, on unusually heavy trading volume. Additionally,  
15 Velodyne's warrants fell \$1.47, or approximately 20%, to close at \$5.90 per warrant on February  
16 22, 2021.

17 **CLASS ACTION ALLEGATIONS**

18 26. Plaintiff brings this action as a class action pursuant to Federal Rule of Civil  
19 Procedure 23(a) and (b)(3) on behalf of a class, consisting of all persons and entities that purchased  
20 or otherwise acquired Velodyne securities between November 9, 2020 and February 19, 2021,  
21 inclusive, and who were damaged thereby (the "Class"). Excluded from the Class are Defendants,  
22 the officers and directors of the Company, at all relevant times, members of their immediate families  
23 and their legal representatives, heirs, successors, or assigns, and any entity in which Defendants  
24 have or had a controlling interest.

25 27. The members of the Class are so numerous that joinder of all members is  
26 impracticable. Throughout the Class Period, Velodyne's shares actively traded on the NASDAQ.  
27 While the exact number of Class members is unknown to Plaintiff at this time and can only be  
28 ascertained through appropriate discovery, Plaintiff believes that there are at least hundreds or  
thousands of members in the proposed Class. Millions of Velodyne shares were traded publicly  
during the Class Period on the NASDAQ. Record owners and other members of the Class may be  
identified from records maintained by Velodyne or its transfer agent and may be notified of the  
pendency of this action by mail, using the form of notice similar to that customarily used in securities  
class actions.

1           28. Plaintiff's claims are typical of the claims of the members of the Class as all members  
2 of the Class are similarly affected by Defendants' wrongful conduct in violation of federal law that  
3 is complained of herein.

4           29. Plaintiff will fairly and adequately protect the interests of the members of the Class  
5 and has retained counsel competent and experienced in class and securities litigation.

6           30. Common questions of law and fact exist as to all members of the Class and  
7 predominate over any questions solely affecting individual members of the Class. Among the  
8 questions of law and fact common to the Class are:

9                   (a) whether the federal securities laws were violated by Defendants' acts as  
10 alleged herein;

11                   (b) whether statements made by Defendants to the investing public during the  
12 Class Period omitted and/or misrepresented material facts about the business, operations, and  
13 prospects of Velodyne; and

14                   (c) to what extent the members of the Class have sustained damages and the  
15 proper measure of damages.

16           31. A class action is superior to all other available methods for the fair and efficient  
17 adjudication of this controversy since joinder of all members is impracticable. Furthermore, as the  
18 damages suffered by individual Class members may be relatively small, the expense and burden of  
19 individual litigation makes it impossible for members of the Class to individually redress the wrongs  
20 done to them. There will be no difficulty in the management of this action as a class action.

21   **UNDISCLOSED ADVERSE FACTS**

22           32. The market for Velodyne's securities was open, well-developed and efficient at all  
23 relevant times. As a result of these materially false and/or misleading statements, and/or failures to  
24 disclose, Velodyne's securities traded at artificially inflated prices during the Class Period. Plaintiff  
25 and other members of the Class purchased or otherwise acquired Velodyne's securities relying upon  
26 the integrity of the market price of the Company's securities and market information relating to  
27 Velodyne, and have been damaged thereby.



1 materially false and/or misleading; knew that such statements or documents would be issued or  
2 disseminated to the investing public; and knowingly and substantially participated or acquiesced in  
3 the issuance or dissemination of such statements or documents as primary violations of the federal  
4 securities laws. As set forth elsewhere herein in detail, the Individual Defendants, by virtue of their  
5 receipt of information reflecting the true facts regarding Velodyne, their control over, and/or receipt  
6 and/or modification of Velodyne's allegedly materially misleading misstatements and/or their  
7 associations with the Company which made them privy to confidential proprietary information  
8 concerning Velodyne, participated in the fraudulent scheme alleged herein.

9 **APPLICABILITY OF PRESUMPTION OF RELIANCE**

10 **(FRAUD-ON-THE-MARKET DOCTRINE)**

11 38. The market for Velodyne's securities was open, well-developed and efficient at all  
12 relevant times. As a result of the materially false and/or misleading statements and/or failures to  
13 disclose, Velodyne's securities traded at artificially inflated prices during the Class Period. On  
14 December 22, 2020, the Company's share price closed at a Class Period high of \$27.38 per share.  
15 Plaintiff and other members of the Class purchased or otherwise acquired the Company's securities  
16 relying upon the integrity of the market price of Velodyne's securities and market information  
17 relating to Velodyne, and have been damaged thereby.

18 39. During the Class Period, the artificial inflation of Velodyne's shares was caused by  
19 the material misrepresentations and/or omissions particularized in this Complaint causing the  
20 damages sustained by Plaintiff and other members of the Class. As described herein, during the  
21 Class Period, Defendants made or caused to be made a series of materially false and/or misleading  
22 statements about Velodyne's business, prospects, and operations. These material misstatements  
23 and/or omissions created an unrealistically positive assessment of Velodyne and its business,  
24 operations, and prospects, thus causing the price of the Company's securities to be artificially  
25 inflated at all relevant times, and when disclosed, negatively affected the value of the Company  
26 shares. Defendants' materially false and/or misleading statements during the Class Period resulted  
27 in Plaintiff and other members of the Class purchasing the Company's securities at such artificially  
28 inflated prices, and each of them has been damaged as a result.

1           40.     At all relevant times, the market for Velodyne’s securities was an efficient market  
2 for the following reasons, among others:

3                   (a)     Velodyne shares met the requirements for listing, and was listed and actively  
4 traded on the NASDAQ, a highly efficient and automated market;

5                   (b)     As a regulated issuer, Velodyne filed periodic public reports wit the SEC  
6 nd/or the NASDAQ;

7                   (c)     Velodyne regularly communicated with public investors via established  
8 market communication mechanisms, including through regular dissemination of press releases on  
9 the national circuits of major newswire services and through other wide-ranging public disclosures,  
10 such as communications with the financial press and other similar reporting services; and/or

11                   (d)     Velodyne was followed by securities analysts employed by brokerage firms  
12 who wrote reports about the Company, and these reports were distributed to the sales force and  
13 certain customers of their respective brokerage firms. Each of these reports was publicly available  
14 and entered the public marketplace.

15           41.     As a result of the foregoing, the market for Velodyne’s securities promptly digested  
16 current information regarding Velodyne from all publicly available sources and reflected such  
17 information in Velodyne’s share price. Under these circumstances, all purchasers of Velodyne’s  
18 securities during the Class Period suffered similar injury through their purchase of Velodyne’s  
19 securities at artificially inflated prices and a presumption of reliance applies.

20           42.     A Class-wide presumption of reliance is also appropriate in this action under the  
21 Supreme Court’s holding in *Affiliated Ute Citizens of Utah v. United States*, 406 U.S. 128 (1972),  
22 because the Class’s claims are, in large part, grounded on Defendants’ material misstatements and/or  
23 omissions. Because this action involves Defendants’ failure to disclose material adverse  
24 information regarding the Company’s business operations and financial prospects—information that  
25 Defendants were obligated to disclose—positive proof of reliance is not a prerequisite to recovery.  
26 All that is necessary is that the facts withheld be material in the sense that a reasonable investor  
27 might have considered them important in making investment decisions. Given the importance of  
28

1 the Class Period material misstatements and omissions set forth above, that requirement is satisfied  
2 here.

3 **NO SAFE HARBOR**

4 43. The statutory safe harbor provided for forward-looking statements under certain  
5 circumstances does not apply to any of the allegedly false statements pleaded in this Complaint. The  
6 statements alleged to be false and misleading herein all relate to then-existing facts and conditions.  
7 In addition, to the extent certain of the statements alleged to be false may be characterized as forward  
8 looking, they were not identified as “forward-looking statements” when made and there were no  
9 meaningful cautionary statements identifying important factors that could cause actual results to  
10 differ materially from those in the purportedly forward-looking statements. In the alternative, to the  
11 extent that the statutory safe harbor is determined to apply to any forward-looking statements  
12 pleaded herein, Defendants are liable for those false forward-looking statements because at the time  
13 each of those forward-looking statements was made, the speaker had actual knowledge that the  
14 forward-looking statement was materially false or misleading, and/or the forward-looking statement  
15 was authorized or approved by an executive officer of Velodyne who knew that the statement was  
16 false when made.

17 **FIRST CLAIM**

18 **Violation of Section 10(b) of The Exchange Act and**  
19 **Rule 10b-5 Promulgated Thereunder**  
20 **Against All Defendants**

21 44. Plaintiff repeats and re-alleges each and every allegation contained above as if fully  
22 set forth herein.

23 45. During the Class Period, Defendants carried out a plan, scheme and course of conduct  
24 which was intended to and, throughout the Class Period, did: (i) deceive the investing public,  
25 including Plaintiff and other Class members, as alleged herein; and (ii) cause Plaintiff and other  
26 members of the Class to purchase Velodyne’s securities at artificially inflated prices. In furtherance  
27 of this unlawful scheme, plan and course of conduct, Defendants, and each defendant, took the  
28 actions set forth herein.

1           46. Defendants (i) employed devices, schemes, and artifices to defraud; (ii) made untrue  
2 statements of material fact and/or omitted to state material facts necessary to make the statements  
3 not misleading; and (iii) engaged in acts, practices, and a course of business which operated as a  
4 fraud and deceit upon the purchasers of the Company's securities in an effort to maintain artificially  
5 high market prices for Velodyne's securities in violation of Section 10(b) of the Exchange Act and  
6 Rule 10b-5. All Defendants are sued either as primary participants in the wrongful and illegal  
7 conduct charged herein or as controlling persons as alleged below.

8           47. Defendants, individually and in concert, directly and indirectly, by the use, means or  
9 instrumentalities of interstate commerce and/or of the mails, engaged and participated in a  
10 continuous course of conduct to conceal adverse material information about Velodyne's financial  
11 well-being and prospects, as specified herein.

12           48. Defendants employed devices, schemes and artifices to defraud, while in possession  
13 of material adverse non-public information and engaged in acts, practices, and a course of conduct  
14 as alleged herein in an effort to assure investors of Velodyne's value and performance and continued  
15 substantial growth, which included the making of, or the participation in the making of, untrue  
16 statements of material facts and/or omitting to state material facts necessary in order to make the  
17 statements made about Velodyne and its business operations and future prospects in light of the  
18 circumstances under which they were made, not misleading, as set forth more particularly herein,  
19 and engaged in transactions, practices and a course of business which operated as a fraud and deceit  
20 upon the purchasers of the Company's securities during the Class Period.

21           49. Each of the Individual Defendants' primary liability and controlling person liability  
22 arises from the following facts: (i) the Individual Defendants were high-level executives and/or  
23 directors at the Company during the Class Period and members of the Company's management team  
24 or had control thereof; (ii) each of these defendants, by virtue of their responsibilities and activities  
25 as a senior officer and/or director of the Company, was privy to and participated in the creation,  
26 development and reporting of the Company's internal budgets, plans, projections and/or reports;  
27 (iii) each of these defendants enjoyed significant personal contact and familiarity with the other  
28 defendants and was advised of, and had access to, other members of the Company's management

1 team, internal reports and other data and information about the Company's finances, operations, and  
2 sales at all relevant times; and (iv) each of these defendants was aware of the Company's  
3 dissemination of information to the investing public which they knew and/or recklessly disregarded  
4 was materially false and misleading.

5 50. Defendants had actual knowledge of the misrepresentations and/or omissions of  
6 material facts set forth herein, or acted with reckless disregard for the truth in that they failed to  
7 ascertain and to disclose such facts, even though such facts were available to them. Such defendants'  
8 material misrepresentations and/or omissions were done knowingly or recklessly and for the purpose  
9 and effect of concealing Velodyne's financial well-being and prospects from the investing public  
10 and supporting the artificially inflated price of its securities. As demonstrated by Defendants'  
11 overstatements and/or misstatements of the Company's business, operations, financial well-being,  
12 and prospects throughout the Class Period, Defendants, if they did not have actual knowledge of the  
13 misrepresentations and/or omissions alleged, were reckless in failing to obtain such knowledge by  
14 deliberately refraining from taking those steps necessary to discover whether those statements were  
15 false or misleading.

16 51. As a result of the dissemination of the materially false and/or misleading information  
17 and/or failure to disclose material facts, as set forth above, the market price of Velodyne's securities  
18 was artificially inflated during the Class Period. In ignorance of the fact that market prices of the  
19 Company's securities were artificially inflated, and relying directly or indirectly on the false and  
20 misleading statements made by Defendants, or upon the integrity of the market in which the  
21 securities trades, and/or in the absence of material adverse information that was known to or  
22 recklessly disregarded by Defendants, but not disclosed in public statements by Defendants during  
23 the Class Period, Plaintiff and the other members of the Class acquired Velodyne's securities during  
24 the Class Period at artificially high prices and were damaged thereby.

25 52. At the time of said misrepresentations and/or omissions, Plaintiff and other members  
26 of the Class were ignorant of their falsity, and believed them to be true. Had Plaintiff and the other  
27 members of the Class and the marketplace known the truth regarding the problems that Velodyne  
28 was experiencing, which were not disclosed by Defendants, Plaintiff and other members of the Class

1 would not have purchased or otherwise acquired their Velodyne securities, or, if they had acquired  
2 such securities during the Class Period, they would not have done so at the artificially inflated prices  
3 which they paid.

4 53. By virtue of the foregoing, Defendants violated Section 10(b) of the Exchange Act  
5 and Rule 10b-5 promulgated thereunder.

6 54. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff and the  
7 other members of the Class suffered damages in connection with their respective purchases and  
8 sales of the Company's securities during the Class Period.

9 **SECOND CLAIM**

10 **Violation of Section 20(a) of The Exchange Act**  
11 **Against the Individual Defendants**

12 55. Plaintiff repeats and re-alleges each and every allegation contained above as if fully  
13 set forth herein.

14 56. Individual Defendants acted as controlling persons of Velodyne within the meaning  
15 of Section 20(a) of the Exchange Act as alleged herein. By virtue of their high-level positions and  
16 their ownership and contractual rights, participation in, and/or awareness of the Company's  
17 operations and intimate knowledge of the false financial statements filed by the Company with the  
18 SEC and disseminated to the investing public, Individual Defendants had the power to influence and  
19 control and did influence and control, directly or indirectly, the decision-making of the Company,  
20 including the content and dissemination of the various statements which Plaintiff contends are false  
21 and misleading. Individual Defendants were provided with or had unlimited access to copies of the  
22 Company's reports, press releases, public filings, and other statements alleged by Plaintiff to be  
23 misleading prior to and/or shortly after these statements were issued and had the ability to prevent  
24 the issuance of the statements or cause the statements to be corrected.

25 57. In particular, Individual Defendants had direct and supervisory involvement in the  
26 day-to-day operations of the Company and, therefore, had the power to control or influence the  
27 particular transactions giving rise to the securities violations as alleged herein, and exercised the  
28 same.



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**LAW OFFICES OF HOWARD G. SMITH**

Howard G. Smith  
3070 Bristol Pike, Suite 112  
Bensalem PA 19020  
Telephone: (215) 638-4847  
Facsimile: (215) 638-4867

*Counsel for Plaintiff Meysam Moradpour*

**SWORN CERTIFICATION OF PLAINTIFF**

Velodyne Lidar, Inc., **SECURITIES LITIGATION**

I, **Meysam Moradpour**, certify:

1. I have reviewed the complaint and authorized its filing and/or adopted its allegations.
2. I did not purchase Velodyne Lidar, Inc., the security that is the subject of this action at the direction of plaintiff's counsel or in order to participate in any private action arising under this title.
3. I am willing to serve as a representative party on behalf of a class and will testify at deposition and trial, if necessary.
4. My transactions in Velodyne Lidar, Inc., during the class period set forth in the Complaint are as follows:  
  
See Attached Transactions
5. I have not served as a representative party on behalf of a class under this title during the last three years except as stated:
6. I will not accept any payment for serving as a representative party, except to receive my pro rata share of any recovery or as ordered or approved by the court including the award to a representative plaintiff of reasonable costs and expenses (including lost wages) directly relating to the representation of the class.

Check here if you are a current employee or former employee of the defendant Company.

I declare under penalty of perjury that the foregoing are true and correct statements.

2/24/2021

Dated: \_\_\_\_\_

DocuSigned by:  
*Meysam Moradpour*  
3EC0CE28963E401...

\_\_\_\_\_  
2/24/2021

**Meysam Moradpour's Transactions in Velodyne Lidar, Inc. (VLDR)**

<b>Date</b>	<b>Transaction Type</b>	<b>Quantity</b>	<b>Unit Price</b>
12/28/2020	Bought	71	\$22.7800
12/28/2020	Bought	100	\$22.7800
12/28/2020	Bought	100	\$22.7800
12/28/2020	Bought	1,451	\$22.7800
12/28/2020	Bought	2,049	\$22.7800
12/28/2020	Bought	100	\$22.7800
12/28/2020	Bought	1,351	\$22.7800
12/28/2020	Bought	100	\$22.7900
12/28/2020	Bought	50	\$22.8000
12/28/2020	Bought	50	\$22.8000
12/28/2020	Bought	15	\$22.8000
12/28/2020	Bought	7	\$22.8000
12/28/2020	Bought	3	\$22.8000
12/28/2020	Bought	653	\$22.8000
12/28/2020	Bought	100	\$22.8290
12/28/2020	Bought	100	\$22.8290
12/28/2020	Bought	100	\$22.8290
1/4/2021	Bought	25	\$21.8500
1/14/2021	Sold	-275	\$23.7500
1/27/2021	Sold	-500	\$26.0200
2/1/2021	Bought	10	\$20.9100
2/1/2021	Bought	200	\$20.9100
2/16/2021	Sold	-210	\$22.1503
2/19/2021	Bought	415	\$20.5600

CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

MEYSAM MORADPOUR, Individually and On Behalf of All Others Similarly Situated

(b) County of Residence of First Listed Plaintiff Orange County, California (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Glancy Prongay & Murray LLP
1925 Century Park East, Suite 2100, Los Angeles, CA 90067; Tel: (310) 201-9150

DEFENDANTS

VELODYNE LIDAR, INC., ANAND GOPALAN, and ANDREW HAMER

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, OTHER, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation-Transfer
8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Private Securities Litigation Reform Act, 15 U.S.C. §§78j(b) and 78t(a) and Rule 10b-5 promulgated thereunder by the SEC (17 C.F.R. § 240.10b-5)
Brief description of cause: Securities Fraud - Violations of Sections 10(b) and 20(a) of the Exchange Act and SEC Rule 10b-5; PSLRA

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only) SAN FRANCISCO/OAKLAND SAN JOSE EUREKA-MCKINLEYVILLE

DATE 03/02/2021

SIGNATURE OF ATTORNEY OF RECORD

s/ Pavithra Rajesh