



1 Plaintiff Asif Mehedi (“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 View, Inc.  
6 (“View” or the “Company”) f/k/a CF Finance Acquisition Corp. II (“CF II”) with the United  
7 States (“U.S.”) Securities and Exchange Commission (“SEC”); (b) review and analysis of press  
8 releases and media reports issued by and disseminated by View; and (c) review of other publicly  
9 available information concerning View.

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 View securities between November 30, 2020 and August 16, 2021, inclusive (the “Class  
13 Period”). Plaintiff pursues claims against the Defendants under the Securities Exchange Act of  
14 1934 (the “Exchange Act”).

15 2. View is a technology company that manufactures smart building products that are  
16 purportedly designed to improve people’s health, productivity, and experience while reducing  
17 energy consumption. Its primary product is a proprietary electrochromic or “smart” glass panel  
18 that, in combination with the Company’s proprietary network and software, intelligently adjusts in  
19 response to the sun by tinting from clear to dark states, thereby reducing heat and glare.

20 3. CF II was a special purpose acquisition company formed for the purpose of  
21 effecting a merger, capital stock exchange, asset acquisition, stock purchase, reorganization, or  
22 similar business combination with one or more businesses.

23 4. On March 8, 2021, CF II and View combined via a Business Combination with  
24 View as the surviving, public entity.

25 5. On August 16, 2021, after the market closed, View announced that it “began an  
26 independent investigation concerning the adequacy of the company’s previously disclosed  
27 warranty accrual.”



1 United States mail, interstate telephone communications, and the facilities of a national securities  
2 exchange.

3 **PARTIES**

4 13. Plaintiff Asif Mehedi, as set forth in the accompanying certification, incorporated  
5 by reference herein, purchased View securities during the Class Period, and suffered damages as a  
6 result of the federal securities law violations and false and/or misleading statements and/or  
7 material omissions alleged herein.

8 14. Defendant View is incorporated under the laws of Delaware with its principal  
9 executive offices located in Milpitas, California. View's Class A common stock trades on the  
10 NASDAQ exchange under the symbol "VIEW." Its redeemable warrants trade on the NASDAQ  
11 exchange under the symbol "VIEWW," where each whole warrant is exercisable for one share of  
12 Class A common stock at an exercise price of \$11.50.

13 15. Defendant Rao Mulpuri ("Mulpuri") was the Company's Chief Executive Officer  
14 ("CEO") at all relevant times.

15 16. Defendant Vidul Prakash ("Prakash") was the Company's Chief Financial Officer  
16 ("CFO") at all relevant times.

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

1 **SUBSTANTIVE ALLEGATIONS**

2 **Background**

3 18. View is a technology company that manufactures smart building products that are  
4 purportedly designed to improve people’s health, productivity, and experience while reducing  
5 energy consumption. Its primary product is a proprietary electrochromic or “smart” glass panel  
6 that, in combination with the Company’s proprietary network and software, intelligently adjusts in  
7 response to the sun by tinting from clear to dark states, thereby reducing heat and glare.

8 19. CF II was a special purpose acquisition company formed for the purpose of  
9 effecting a merger, capital stock exchange, asset acquisition, stock purchase, reorganization, or  
10 similar business combination with one or more businesses.

11 20. On March 8, 2021, CF II and View combined via a Business Combination with  
12 View as the surviving, public entity.

13 **Materially False and Misleading**

14 **Statements Issued During the Class Period**

15 21. The Class Period begins on November 30, 2020. On that day, CF II and View  
16 announced that they had entered into a definitive merger agreement in a press release that stated,  
17 in relevant part:

18 View, Inc. ("View"), a Silicon Valley-based smart window company, and CF  
19 Finance Acquisition Corp. II (Nasdaq: CFII) ("CF II"), a special purpose  
20 acquisition company sponsored by Cantor Fitzgerald, today announced they have  
21 entered into a definitive merger agreement. The combined company will be called  
22 View, Inc. and will be publicly listed on the NASDAQ market following the close  
23 of the transaction.

24 \* \* \*

25 **Transaction Details**

26 The Board of Directors of each of View and CF Finance Acquisition Corp. II have  
27 unanimously approved the transaction. The transaction will require the approval of  
28 the stockholders of CF Finance Acquisition Corp. II and View, and is subject to  
other customary closing conditions, including the receipt of certain regulatory  
approvals. The transaction is expected to close in the first quarter of 2021.

Assuming no redemptions by CF II stockholders, the transaction is expected to  
deliver up to \$800 million of gross proceeds including the contribution of up to  
\$500 million of cash held in CFII's trust account from its initial public offering. The

1 transaction is further supported by a \$300 million private investment in public  
2 equity ("PIPE") at \$10.00 per share.

3 All cash remaining in CF II at the closing after paying off transaction expenses and  
4 CF II liabilities is expected to be used to retire debt and to add cash to View's  
5 balance sheet for working capital, growth capex and other general corporate  
6 purposes.

7 22. On December 23, 2020, CF II filed its Registration Statement on Form S-4 (the  
8 "Registration Statement") in connection with the Business Combination. The Registration  
9 Statement reported that View recorded a one-time warranty accrual of \$24.5 million during the  
10 nine months ended September 30, 2019 and that the Company's cost of revenue decreased year-  
11 over-year during the nine months ended September 30, 2020. Specifically, the Registration  
12 Statement stated:

13 Cost of revenue decreased by \$44.2 million or 32.5%, from \$136.0 million in the  
14 nine months ended September 30, 2019, to \$91.8 million in the nine months ended  
15 September 30, 2020. The decrease in the cost of revenue was primarily related to  
16 three factors: (a) a one-time warranty accrual of \$24.5 million during the nine  
17 months ended September 30, 2019 related to faulty materials from one of our  
18 suppliers used in the manufacturing of IGUs, (b) a \$16.9 million decrease in  
19 customer support expense, consisting of a \$5.9 million decrease in customer  
20 support expenses due to cost reductions efforts and an \$11.0 million decrease in  
21 customer support expenses due to a re-allocation of resources from cost of revenue  
22 to selling, general, and administrative expenses, and (c) a decrease in production  
23 cost of \$2.3 million, consisting of a decrease in our inventory valuation provision  
24 of \$14.2 million relating to the production of certain standard inventory units  
25 considered excess and obsolete in the nine months ended September 30, 2019,  
26 offset by an increase of \$11.9 million due to change in the mix of our products  
27 manufactured to satisfy customer orders.

28 23. The Registration Statement also reported the following financial results:

1 *Comparison of the nine months ended September 30, 2020 and 2019*

2 The following table sets forth our historical operating results for the periods indicated (in thousands, except percentages):

	Nine Months Ended September 30,		Change	% Change
	2020	2019		
Revenue	\$ 24,539	\$ 12,534	\$ 12,005	95.8%
Costs and expenses:				
Cost of revenue	91,825	135,998	(44,173)	(32.5)%
Research and development	50,344	56,709	(6,365)	(11.2)%
Selling, general, and administrative	62,835	54,743	8,092	14.8%
Total costs and expenses	205,004	247,450	(42,446)	(17.2)%
Loss from operations	(180,465)	(234,916)	54,451	(23.2)%
Interest and other income (expense), net:				
Interest income	501	4,825	(4,324)	(89.6)%
Interest expense	(19,191)	(5,951)	(13,240)	222.5%
Other expense	(109)	(49)	(60)	122.4%
(Loss) gain on fair value change	(2,296)	1,750	(4,046)	(231.2)%
Interest and other income (expense), net	(21,095)	575	(21,670)	*
Loss before provision of income taxes	(201,560)	(234,381)	32,781	(14.0)%
Provision for income taxes	(137)	(40)	(97)	242.5%
Net loss	\$(201,697)	\$(234,381)	\$ 32,684	(13.9)%

9 \* not meaningful

10 24. Regarding risks impacting View, the Registration Statement stated, in relevant part:

11 *View may choose to or be compelled to undertake product recalls or take other*  
 12 *similar actions, which could adversely affect View's brand image and financial*  
 13 *performance.*

14 \* \* \*

15 In 2019, View identified a quality issue with certain material purchased from one  
 16 of its suppliers utilized in the manufacturing of certain IGUs. View stopped using  
 17 the affected materials upon identification in 2019. As of December 31, 2019, View  
 18 had a low warranty claim rate related to this matter. View has replaced and expects  
 19 to continue to replace affected IGUs for the remainder of the period covered by the  
 20 warranty. View analyzed the risk of failure of the affected IGUs by analyzing  
 21 failure rate as a function of time required for the IGU to fail since it was installed,  
 22 and the geographical region where the IGU was ultimately installed. Based on this  
 23 analysis, View estimated the number of IGUs expected to fail in the remaining  
 24 warranty period and applied an estimated cost to calculate the cost to replace the  
 25 IGUs. The estimated cost includes View's expectations regarding future reductions  
 26 in production costs. Based on its analysis, View recognized \$24.5 million of  
 27 expense for the estimated future cost to replace defective IGUs classified in cost of  
 28 revenue in View's consolidated statement of comprehensive loss for the year ended  
 December 31, 2019. View recognized a corresponding warranty liability of \$1.6  
 million in other current liabilities and \$22.9 million in other liabilities on its  
 consolidated balance sheet as of December 31, 2019. Considering the limited  
 failure rate data available to-date, and the uncertainty inherent in the failure  
 analysis and the projected costs to replace defective IGUs in future years, the actual  
 timing, number of defective IGUs, and amount of costs to be incurred to replace the  
 defective IGUs could be materially different from the estimate. There was no  
 significant change in the warranty accrual in the nine months ended September 30,  
 2020.

25 25. The Registration Statement further stated that View's "warranty reserves *may* be  
 26 insufficient to cover future warranty claims." Specifically, it stated:

1 ***View's current and future warranty reserves may be insufficient to cover future***  
2 ***warranty claims which could adversely affect its financial performance.***

3 If View's warranty reserves are inadequate to cover future warranty claims on its  
4 products, its business, prospects, financial condition and operating results could be  
5 materially and adversely affected. View evaluates warranty reserves on an ongoing  
6 basis and record liabilities for matters in which losses are probable and the amount  
7 of loss can be reasonably estimated. In 2019, View identified a quality issue with  
8 certain material purchased from one of its suppliers utilized in the manufacturing of  
9 certain IGUs. View stopped using the affected materials upon identification in  
10 2019. As of December 31, 2019, View had a low warranty claim rate related to this  
11 matter. View has replaced and expects to continue to replace affected IGUs for the  
12 remainder of the period covered by the warranty. View analyzed the risk of failure  
13 of the affected IGUs by analyzing failure rate as a function of time required for the  
14 IGU to fail since it was installed, and the geographical region where the IGU was  
15 ultimately installed. Based on this analysis, View estimated the number of IGUs  
16 expected to fail in the remaining warranty period and applied an estimated cost to  
17 calculate the cost to replace the IGUs. The estimated cost includes View's  
18 expectations regarding future reductions in production costs. Based on its analysis,  
19 View recognized \$24.5 million of expense for the estimated future cost to replace  
20 defective IGUs classified in cost of revenue in View's consolidated statement of  
21 comprehensive loss for the year ended December 31, 2019. View recognized a  
22 corresponding warranty liability of \$1.6 million in other current liabilities and  
23 \$22.9 million in other liabilities on its consolidated balance sheet as of December  
24 31, 2019. Considering the limited failure rate data available to-date, and the  
25 uncertainty inherent in the failure analysis and the projected costs to replace  
26 defective IGUs in future years, the actual timing, number of defective IGUs, and  
27 amount of costs to be incurred to replace the defective IGUs could be materially  
28 different from the estimate. There was no significant change in the warranty accrual  
in the nine months ended September 30, 2020.

26. The Registration Statement described View's warranty policy and accounting as  
follows:

*Product Warranties*

We provide a standard assurance type warranty that our IGUs will be free from defects in materials and workmanship for 10 years from the date of delivery to customers. IGUs with sloped or laminated glass have a warranty of 5 years. Control systems associated with the sale of IGUs have a 5-year warranty. Management judgment is required to estimate the amount of product warranty accrual. Warranty accruals are based on estimates that are updated on an ongoing basis taking into consideration inputs such as changes in the failure rates, volume of claims compared with our historical experience, and the changes in the cost of servicing warranty claims.

There is uncertainty inherent in the failure rate analysis and the projected costs to replace or repair the defective products in future years, as such we evaluate warranty accruals on an ongoing basis and account for the effect of changes in estimates prospectively.

In 2019, we identified a quality issue with certain material purchased from one of our suppliers utilized in the manufacturing of certain IGUs. The Company stopped using the affected materials upon identification in 2019. As of December 31, 2019,

1 we had a low warranty claim rate related to this matter. We have replaced and  
2 expect to continue to replace affected IGUs for the remainder of the period covered  
3 by the warranty. We analyzed the risk of failure of the affected IGUs by analyzing  
4 failure rate as a function of time required for the IGU to fail since it was installed,  
5 and the geographical region where the IGU was ultimately installed. Based on this  
6 analysis, we estimated the number of IGUs expected to fail in the remaining  
7 warranty period and applied an estimated cost to calculate the cost to replace the  
8 IGUs. The estimated cost includes our expectations regarding future reductions in  
9 production costs. Based on our analysis, we recognized \$24.5 million of expense  
10 for the estimated future cost to replace defective IGUs classified in cost of revenue  
11 in our consolidated statement of comprehensive loss for the year ended December  
12 31, 2019. We recognized a corresponding warranty liability of \$1.6 million in other  
13 current liabilities and \$22.9 million in other liabilities on our consolidated balance  
14 sheet as of December 31, 2019. Considering the limited failure rate data available  
15 to-date, and the uncertainty inherent in the failure analysis and the projected costs  
16 to replace defective IGUs in future years, the actual timing, number of defective  
17 IGUs, and amount of costs to be incurred to replace the defective IGUs could be  
18 materially different from the estimate. There was no significant change in the  
19 warranty accrual in the nine months ended September 30, 2020.

20 27. On January 26, 2021, CF II filed an amendment to the Registration Statement,  
21 which contained substantially similar statements regarding risks related to product warranties as  
22 identified in ¶¶ 24-26. It further stated that View recorded a one-time warranty accrual of \$24.5  
23 million during the nine months ended September 30, 2019 and that the Company's cost of revenue  
24 decreased year-over-year during the nine months ended September 30, 2020. Specifically, it  
25 stated:

26 Cost of revenue decreased by \$44.2 million or 32.5%, from \$136.0 million in the  
27 nine months ended September 30, 2019, to \$91.8 million in the nine months ended  
28 September 30, 2020. The decrease in the cost of revenue was primarily related to  
the three following factors:

(a) A one-time warranty accrual of \$24.5 million during the nine months ended  
September 30, 2019 related to faulty materials from one of our suppliers used in the  
manufacturing of IGUs. In 2019, we identified a quality issue with certain material  
purchased from one of our suppliers utilized in the manufacturing of certain IGUs.  
We stopped using the affected materials upon identification in 2019. As of  
September 30, 2020, we had a low warranty claim rate related to this matter. We  
have replaced and expect to continue to replace affected IGUs for the remainder of  
the period covered by the warranty. We analyzed the risk of failure of the affected  
IGUs by analyzing failure rate as a function of time required for the IGU to fail  
since it was installed, and the geographical region where the IGU was ultimately  
installed. Based on this analysis, we estimated the number of IGUs expected to fail  
in the remaining warranty period and applied an estimated cost to calculate the cost  
to replace the IGUs. The estimated cost includes our expectations regarding future  
reductions in production costs which are primarily comprised of materials, labor,  
and factory overhead. Based on our analysis, we recognized \$24.5 million of  
expense for the estimated future cost to replace defective IGUs classified in cost of  
revenue in our consolidated statement of comprehensive loss for the nine months  
ended September 30, 2019. It is reasonably possible that the amount of costs to be

1 incurred to replace the defective IGUs could be materially different from the  
2 estimate. Considering the limited failure rate data available to-date and the  
3 uncertainty inherent in the failure analysis, including the projected costs to replace  
4 defective IGUs in future years, the actual timing of the failures and the number of  
5 defective IGUs, we are unable to estimate the amount of any potential additional  
6 losses. *See section titled Critical Accounting Policies and Estimates – Product  
7 Warranties.*

8 (b) A \$16.9 million decrease in customer support expense . . .

9 (c) A decrease in production cost of \$2.3 million . . .

10 28. On February 16, 2021, the Company filed its prospectus on Form 424b3, soliciting  
11 stockholder approval for the Business Combination, which contained substantially the same  
12 statements as identified in ¶¶ 24-27. The same day, the Registration Statement was declared  
13 effective.

14 29. On March 15, 2021, View issued a press release announcing its fiscal 2020  
15 financial results, stating in relevant part:

16 Business highlights are detailed below:

- 17 • Full year revenue increased 32.8% y/y to \$32.3 million in spite of the  
18 impacts of the pandemic
- 19 • GAAP loss from operations improved 16.1% y/y; Adjusted EBITDA  
20 improved 27.7% y/y
- 21 • Completed the announced transaction, raising gross proceeds of \$815.2  
22 million resulting in \$518.3 million of cash on the balance sheet, after  
23 retiring existing debt
- 24 • Recent customer announcements include Uber, Dallas Forth Worth  
25 International Airport, Tavistock Development Company, Oxford Property  
26 Group, Google, Nuveen, and others (see below for more details)

27 “View exceeded our plan for the full year 2020. Now in the public markets, we are  
28 excited about building on that success,” said Dr. Rao Mulpuri, Chairman and CEO  
of View. “The company is poised for high growth with a strong balance sheet,  
exciting product offerings, growing customer base, and accelerating market  
adoption. We are well capitalized and excited about the future, as the world looks  
to build smart buildings that are more sustainable, experiential, and healthier.”

30. On May 12, 2021, View issued a press release announcing its first quarter 2021  
financial results, stating in relevant part:

**First Quarter 2021 Highlights:**

- GAAP revenue of \$11.8 million, a 29% increase from Q1 2020 and a 52%  
increase from Q4 2020.

- 1 • GAAP cost of revenue of \$29.9 million, a 16% improvement from Q1 2020  
2 and a 5% improvement from Q4 2020 due to production efficiencies.
- 3 • GAAP operating expenses of \$37.1 million, a 16% improvement from Q1  
4 2020 driven by cost controls, and a 10% increase over Q4 2020 related to  
5 growth initiatives and IPO preparations.
- 6 • GAAP loss from operations of (\$55.1) million, a 22% improvement  
7 compared to Q1 2020 and 4% improvement from Q4 2020.
- 8 • Non-GAAP Adjusted EBITDA of (\$37.8) million, a 31% improvement  
9 compared to Q1 2020 reflecting higher revenues, improved factory costs  
10 and streamlined operating expenses. Non-GAAP Adjusted EBITDA  
11 improvement of 11% over Q4 2020.

12 31. On May 17, 2021, View filed its quarterly report on Form 10-Q for the period  
13 ended March 31, 2021 (the “1Q21 10-Q”), affirming the previously reported financial results.

14 Regarding product warranties, the Company stated, in relevant part:

#### 15 **Product Warranties**

16 The Company provides a standard assurance type warranty that its IGUs will be  
17 free from defects in materials and workmanship for generally 10 years from the  
18 date of delivery to customers. IGUs with sloped or laminated glass generally have a  
19 warranty of 5 years. Control systems associated with the sale of IGUs typically  
20 have a 5-year warranty. In resolving warranty claims, the Company generally has  
21 the option of either repairing or replacing the covered product. Based on historical  
22 experience, the Company accrues for estimated returns of defective products at the  
23 time revenue is recognized. The Company monitors warranty obligations and may  
24 make revisions to its warranty reserve if actual costs of product repair and  
25 replacement are significantly higher or lower than estimated. *Accruals for  
26 anticipated future warranty costs are recorded to cost of revenue in the  
27 condensed consolidated statements of comprehensive loss and included in other  
28 current liabilities and other liabilities on the condensed consolidated balance  
sheet.* Warranty accruals are based on estimates that are updated on an ongoing  
basis taking into consideration inputs such as changes in the volume of claims  
compared with the Company’s historical experience, and the changes in the cost of  
servicing warranty claims. The estimated cost includes the Company’s expectations  
regarding future reductions in production costs which comprise of materials, labor,  
and factory overhead. The Company accounts for the effect of such changes in  
estimates prospectively.

In 2019, the Company identified a quality issue with certain material purchased  
from one of its suppliers utilized in the manufacturing of certain IGUs. The  
Company stopped using the affected materials upon identification in 2019. The  
Company has had a low warranty claim rate to-date related to this matter. The  
Company has replaced and expects to continue to replace the affected IGUs for the  
remainder of the period covered by the warranty. The Company analyzed the risk  
of failure of the affected IGUs by analyzing historical failure rate as a function of  
time since the IGU installation. Based on this analysis, the Company estimated the  
number of IGUs expected to fail in the remaining warranty period and applied an  
estimated cost to calculate the cost to replace the IGUs. The estimated cost includes

1 the Company's expectations regarding future reductions in production costs which  
2 comprise of materials, labor, and factory overhead.

3 ***As of March 31, 2021 and December 31, 2020, the warranty liability included in***  
4 ***accrued expenses and other current liabilities was \$3.8 and \$4.0 million and***  
5 ***other liabilities was \$18.1 million and \$18.7 million, respectively, on the***  
6 ***condensed consolidated balance sheets. During the three months ended March***  
7 ***31, 2021, the Company recorded a net credit of \$0.3 million for the reduction in***  
8 ***product warranties and consumption of \$0.5 million.*** During the three months  
9 ended March 31, 2020, the Company recognized a warranty expense of \$0.5  
10 million and consumption of \$0.7 million.

11 Unforeseen component failures or exceptional component performance can also  
12 result in changes to warranty costs. ***If actual warranty costs differ substantially***  
13 ***from the Company's estimates, revisions to the estimated warranty liability would***  
14 ***be required, which could have a material adverse effect on the Company's***  
15 ***business, financial condition and results of operations.***

16 32. The 1Q21 10-Q also stated that the Company had material weaknesses in its  
17 internal control over financial reporting:

18 We did not design or maintain an effective internal control environment that meets  
19 our accounting and reporting requirements. Specifically, we did not have a  
20 sufficient complement of personnel with an appropriate degree of accounting  
21 knowledge and experience to appropriately analyze, record and disclose accounting  
22 matters commensurate with our accounting and reporting requirements and lacked  
23 related internal controls necessary to satisfy our accounting and financial reporting  
24 requirements. This material weakness contributed to the following additional  
25 material weaknesses:

- 26 • We did not design or maintain effective controls over risk assessment,  
27 including designing and maintaining formal accounting policies,  
28 procedures, and controls over significant accounts and disclosures to  
achieve complete, accurate and timely financial accounting, reporting and  
disclosures, including with respect to revenue and receivables, inventory,  
equity and derivative liabilities, and period-end financial reporting.
- We did not design or maintain effective controls over information  
technology ("IT") general controls for information systems that are relevant  
to the preparation of its financial statements. Specifically, we did not design  
and maintain: (i) program change management control for financial systems  
relevant to our financial reporting to ensure that information technology  
program and data changes affecting financial IT applications and underlying  
accounting records are identified, tested, authorized and implemented  
appropriately; (ii) user access controls to ensure appropriate segregation of  
duties and that adequately restrict user and privileged access to financial  
applications, programs, and data to appropriate our personnel; (iii) computer  
operations controls to ensure critical data interfaces between systems are  
appropriately identified and monitored, data backups are authorized and  
monitored, and restorations are tested; and (iv) testing and approval controls  
for program development to ensure that new software development is  
aligned with business and IT requirements.

1 The material weaknesses related to the control environment and risk assessment  
2 resulted in adjustments to several accounts and disclosures in the December 31,  
3 2020, 2019 and 2018 annual and the March 31, 2021, September 30, 2020 and  
4 2019 quarterly financial statements. The IT deficiencies did not result in an  
5 adjustment to the financial statements; however, the deficiencies, when aggregated,  
6 could impact maintaining effective segregation of duties, as well as the  
7 effectiveness of IT-dependent controls (such as automated controls that address the  
8 risk of material misstatement to one or more assertions, along with the IT controls  
9 and underlying data that support the effectiveness of system-generated data and  
10 reports) that could result in misstatements potentially impacting all financial  
11 statement accounts and disclosures that would not be prevented or detected.  
12 Additionally, each of these material weaknesses could result in a misstatement of  
13 account balances or disclosures that would result in a material misstatement to the  
14 annual or interim condensed consolidated financial statements that would not be  
15 prevented or detected.

16 33. The above statements identified in ¶¶ 21-32 were materially false and/or  
17 misleading, and failed to disclose material adverse facts about the Company's business,  
18 operations, and prospects. Specifically, Defendants failed to disclose to investors: (1) that View  
19 had not properly accrued warranty costs related to its product; (2) that there was a material  
20 weakness in View's internal controls over accounting and financial reporting related to warranty  
21 accrual; (3) that, as a result, the Company's financial results for prior periods were misstated; and  
22 (4) that, as a result of the foregoing, Defendants' positive statements about the Company's  
23 business, operations, and prospects were materially misleading and/or lacked a reasonable basis.

#### 24 **Disclosures at the End of the Class Period**

25 34. On August 16, 2021, after the market closed, View announced that it "began an  
26 independent investigation concerning the adequacy of the company's previously disclosed  
27 warranty accrual." In a Form 12b-25 filed with the SEC, View stated:

28 View, Inc. (the "Company") is unable, without unreasonable effort or expense, to  
file its Quarterly Report on Form 10-Q for the three and six months ended June 30,  
2021 ("Second Quarter 10-Q") within the prescribed time period because it requires  
additional time to complete the investigation described below. The Company is  
currently unable to predict when it will be able to file its Second Quarter 10-Q, and  
does not currently expect to file by the extended filing date pursuant to Rule 12b-  
25.

The Audit Committee of the Company's Board of Directors ("Audit Committee")  
*recently began an independent investigation concerning the adequacy of the  
Company's previously disclosed warranty accrual.* The investigation is ongoing,  
and the Audit Committee continues to work diligently with independent counsel  
and advisors to complete the investigation as soon as possible. The Company  
cannot predict the duration of the investigation, eventual scope, its outcome, or its  
impact on the Company's financial results or the Company's assessment of its

1 internal control over financial reporting for prior periods. *As a result, the Company*  
2 *has not finalized its financial statements or its assessment of the effectiveness of*  
3 *its disclosure controls and procedures and internal control over financial*  
4 *reporting for the three and six months ended June 30, 2021.* The Company  
5 expects that it will finalize its financial statements and file the related Second  
6 Quarter 10-Q as soon as practicable after the conclusion of the investigation.

7 35. On this news, the Company's share price fell \$1.26, or over 24%, to close at \$3.92  
8 per share on August 17, 2021, on unusually heavy trading volume.

9 **CLASS ACTION ALLEGATIONS**

10 36. Plaintiff brings this action as a class action pursuant to Federal Rule of Civil  
11 Procedure 23(a) and (b)(3) on behalf of a class, consisting of all persons and entities that  
12 purchased or otherwise acquired View securities between November 30, 2020 and August 16,  
13 2021, inclusive, and who were damaged thereby (the "Class"). Excluded from the Class are  
14 Defendants, the officers and directors of the Company, at all relevant times, members of their  
15 immediate families and their legal representatives, heirs, successors, or assigns, and any entity in  
16 which Defendants have or had a controlling interest.

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

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

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



1 misleading because they failed to disclose material adverse information and/or misrepresented the  
2 truth about View's business, operations, and prospects as alleged herein.

3 44. At all relevant times, the material misrepresentations and omissions particularized  
4 in this Complaint directly or proximately caused or were a substantial contributing cause of the  
5 damages sustained by Plaintiff and other members of the Class. As described herein, during the  
6 Class Period, Defendants made or caused to be made a series of materially false and/or misleading  
7 statements about View's financial well-being and prospects. These material misstatements and/or  
8 omissions had the cause and effect of creating in the market an unrealistically positive assessment  
9 of the Company and its financial well-being and prospects, thus causing the Company's securities  
10 to be overvalued and artificially inflated at all relevant times. Defendants' materially false and/or  
11 misleading statements during the Class Period resulted in Plaintiff and other members of the Class  
12 purchasing the Company's securities at artificially inflated prices, thus causing the damages  
13 complained of herein when the truth was revealed.

14 **LOSS CAUSATION**

15 45. Defendants' wrongful conduct, as alleged herein, directly and proximately caused  
16 the economic loss suffered by Plaintiff and the Class.

17 46. During the Class Period, Plaintiff and the Class purchased View's securities at  
18 artificially inflated prices and were damaged thereby. The price of the Company's securities  
19 significantly declined when the misrepresentations made to the market, and/or the information  
20 alleged herein to have been concealed from the market, and/or the effects thereof, were revealed,  
21 causing investors' losses.

22 **SCIENTER ALLEGATIONS**

23 47. As alleged herein, Defendants acted with scienter since Defendants knew that the  
24 public documents and statements issued or disseminated in the name of the Company were  
25 materially false and/or misleading; knew that such statements or documents would be issued or  
26 disseminated to the investing public; and knowingly and substantially participated or acquiesced  
27 in the issuance or dissemination of such statements or documents as primary violations of the  
28 federal securities laws. As set forth elsewhere herein in detail, the Individual Defendants, by

1 virtue of their receipt of information reflecting the true facts regarding View, their control over,  
2 and/or receipt and/or modification of View's allegedly materially misleading misstatements and/or  
3 their associations with the Company which made them privy to confidential proprietary  
4 information concerning View, participated in the fraudulent scheme alleged herein.

5 **APPLICABILITY OF PRESUMPTION OF RELIANCE**

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

7 48. The market for View's securities was open, well-developed and efficient at all  
8 relevant times. As a result of the materially false and/or misleading statements and/or failures to  
9 disclose, View's securities traded at artificially inflated prices during the Class Period. On  
10 January 14, 2021, the Company's share price closed at a Class Period high of \$12.91 per share.  
11 Plaintiff and other members of the Class purchased or otherwise acquired the Company's  
12 securities relying upon the integrity of the market price of View's securities and market  
13 information relating to View, and have been damaged thereby.

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

25 50. At all relevant times, the market for View's securities was an efficient market for  
26 the following reasons, among others:

27 (a) View shares met the requirements for listing, and was listed and actively  
28 traded on the NASDAQ, a highly efficient and automated market;

1 (b) As a regulated issuer, View filed periodic public reports with the SEC  
2 and/or the NASDAQ;

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

7 (d) View was followed by securities analysts employed by brokerage firms who  
8 wrote reports about the Company, and these reports were distributed to the sales force and certain  
9 customers of their respective brokerage firms. Each of these reports was publicly available and  
10 entered the public marketplace.

11 51. As a result of the foregoing, the market for View's securities promptly digested  
12 current information regarding View from all publicly available sources and reflected such  
13 information in View's share price. Under these circumstances, all purchasers of View's securities  
14 during the Class Period suffered similar injury through their purchase of View's securities at  
15 artificially inflated prices and a presumption of reliance applies.

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

26 **NO SAFE HARBOR**

27 53. The statutory safe harbor provided for forward-looking statements under certain  
28 circumstances does not apply to any of the allegedly false statements pleaded in this Complaint.

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

12 **FIRST CLAIM**

13 **Violation of Section 10(b) of The Exchange Act and**

14 **Rule 10b-5 Promulgated Thereunder**

15 **Against All Defendants**

16 54. Plaintiff repeats and re-alleges each and every allegation contained above as if fully  
17 set forth herein.

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

24 56. Defendants (i) employed devices, schemes, and artifices to defraud; (ii) made  
25 untrue statements of material fact and/or omitted to state material facts necessary to make the  
26 statements not misleading; and (iii) engaged in acts, practices, and a course of business which  
27 operated as a fraud and deceit upon the purchasers of the Company’s securities in an effort to  
28 maintain artificially high market prices for View’s securities in violation of Section 10(b) of the

1 Exchange Act and Rule 10b-5. All Defendants are sued either as primary participants in the  
2 wrongful and illegal conduct charged herein or as controlling persons as alleged below.

3 57. Defendants, individually and in concert, directly and indirectly, by the use, means  
4 or instrumentalities of interstate commerce and/or of the mails, engaged and participated in a  
5 continuous course of conduct to conceal adverse material information about View's financial well-  
6 being and prospects, as specified herein.

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

16 59. Each of the Individual Defendants' primary liability and controlling person liability  
17 arises from the following facts: (i) the Individual Defendants were high-level executives and/or  
18 directors at the Company during the Class Period and members of the Company's management  
19 team or had control thereof; (ii) each of these defendants, by virtue of their responsibilities and  
20 activities as a senior officer and/or director of the Company, was privy to and participated in the  
21 creation, development and reporting of the Company's internal budgets, plans, projections and/or  
22 reports; (iii) each of these defendants enjoyed significant personal contact and familiarity with the  
23 other defendants and was advised of, and had access to, other members of the Company's  
24 management team, internal reports and other data and information about the Company's finances,  
25 operations, and sales at all relevant times; and (iv) each of these defendants was aware of the  
26 Company's dissemination of information to the investing public which they knew and/or  
27 recklessly disregarded was materially false and misleading.

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

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

21           62. At the time of said misrepresentations and/or omissions, Plaintiff and other  
22 members of the Class were ignorant of their falsity, and believed them to be true. Had Plaintiff  
23 and the other members of the Class and the marketplace known the truth regarding the problems  
24 that View was experiencing, which were not disclosed by Defendants, Plaintiff and other members  
25 of the Class would not have purchased or otherwise acquired their View securities, or, if they had  
26 acquired such securities during the Class Period, they would not have done so at the artificially  
27 inflated prices which they paid.

28



1 Act. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff and other  
2 members of the Class suffered damages in connection with their purchases of the Company's  
3 securities during the Class Period.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff prays for relief and judgment, as follows:

6 (a) Determining that this action is a proper class action under Rule 23 of the Federal  
7 Rules of Civil Procedure;

8 (b) Awarding compensatory damages in favor of Plaintiff and the other Class members  
9 against all defendants, jointly and severally, for all damages sustained as a result of Defendants'  
10 wrongdoing, in an amount to be proven at trial, including interest thereon;

11 (c) Awarding Plaintiff and the Class their reasonable costs and expenses incurred in  
12 this action, including counsel fees and expert fees; and

13 (d) Such other and further relief as the Court may deem just and proper.

14 **JURY TRIAL DEMANDED**

15 Plaintiff hereby demands a trial by jury.

16  
17 DATED: August 18, 2021

**GLANCY PRONGAY & MURRAY LLP**

18 By: s/ Pavithra Rajesh

19 Robert V. Prongay

20 Charles H. Linehan

21 Pavithra Rajesh

1925 Century Park East, Suite 2100

Los Angeles, California 90067

22 Telephone: (310) 201-9150

23 Facsimile: (310) 201-9160

Email: info@glancylaw.com

24 **THE LAW OFFICES OF FRANK R. CRUZ**

25 Frank R. Cruz

1999 Avenue of the Stars, Suite 1100

26 Los Angeles, CA 90067

27 Telephone: (310) 914-5007

28 *Attorneys for Asif Mehedi*

**SWORN CERTIFICATION OF PLAINTIFF**

**VIEW, INC. SECURITIES LITIGATION**

I, Asif Mehedi, certify that:

1. I have reviewed the Complaint, adopt its allegations, and authorize the filing of a Lead Plaintiff motion on my behalf.
2. I did not purchase the View, Inc. securities that are 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 View, Inc. securities during the Class Period set forth in the Complaint are as follows:  
  
(See attached transactions)
5. I have not sought to serve, nor served, as a representative party on behalf of a class under this title during the last three years, except for the following:
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.

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

8/17/2021

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Date

*Asif Mehedi*

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Asif Mehedi

**Asif Mehedi's Transactions in View, Inc. (VIEW)**

<b>Date</b>	<b>Transaction Type</b>	<b>Quantity</b>	<b>Unit Price</b>
2/24/2021	Bought	10	\$10.49
2/1/2021	Bought	75	\$10.98
2/1/2021	Bought	25	\$11.01
2/1/2021	Bought	25	\$11.00
2/18/2021	Bought	30	\$11.22
2/23/2021	Bought	10	\$10.75
2/24/2021	Bought	25	\$10.49
2/24/2021	Bought	50	\$10.46
2/25/2021	Bought	20	\$10.07
2/25/2021	Bought	30	\$10.08
2/26/2021	Bought	5	\$10.02
3/8/2021	Bought	10	\$8.65
3/24/2021	Bought	35	\$7.81
4/6/2021	Bought	20	\$8.00
4/12/2021	Bought	30	\$8.25
4/14/2021	Bought	20	\$8.73
4/14/2021	Bought	10	\$8.71
4/15/2021	Bought	10	\$7.03
4/21/2021	Bought	10	\$6.82
4/22/2021	Bought	25	\$7.45
4/29/2021	Bought	5	\$9.42
4/29/2021	Bought	20	\$9.44
4/30/2021	Bought	5	\$8.97
5/11/2021	Bought	10	\$6.74
5/13/2021	Bought	10	\$6.11
5/13/2021	Bought	3	\$6.88
5/13/2021	Bought	22	\$6.89
5/13/2021	Bought	10	\$6.86
5/14/2021	Bought	50	\$6.40
6/1/2021	Bought	20	\$8.18
6/4/2021	Bought	20	\$8.10
6/4/2021	Bought	10	\$8.05
6/15/2021	Bought	10	\$8.89
6/15/2021	Bought	10	\$8.83
6/21/2021	Bought	25	\$8.79
6/22/2021	Bought	25	\$8.78
6/28/2021	Bought	20	\$8.32
6/28/2021	Bought	15	\$8.43
6/28/2021	Bought	25	\$8.42
6/28/2021	Bought	15	\$8.35
6/30/2021	Bought	10	\$8.42

<b>Date</b>	<b>Transaction Type</b>	<b>Quantity</b>	<b>Unit Price</b>
7/1/2021	Bought	10	\$8.04
7/1/2021	Bought	10	\$8.05
7/1/2021	Bought	10	\$7.95
7/1/2021	Bought	10	\$8.02
7/2/2021	Bought	20	\$7.55
7/2/2021	Bought	20	\$7.61
7/2/2021	Bought	10	\$7.73
7/2/2021	Bought	15	\$7.73
7/8/2021	Bought	25	\$6.91
7/12/2021	Bought	4	\$7.07
7/15/2021	Bought	1	\$7.20
7/19/2021	Bought	25	\$6.76
7/26/2021	Bought	15	\$6.52
8/2/2021	Bought	2	\$6.15
8/3/2021	Bought	3	\$6.02
8/3/2021	Bought	15	\$6.01
8/13/2021	Bought	10	\$5.37
8/16/2021	Bought	5	\$5.24
8/16/2021	Bought	5	\$5.24