



THE COURT OF CHANCERY OF THE STATE OF DELAWARE

JOHN E. MALORK, Individually and
on Behalf of All Others Similarly
Situated,

Plaintiff,

v.

C.A. No. 2022-0260-PAF

ERIK ANDERSON, JENNIFER
AAKER, JANE KEARNS, PIERRE
LAPEYRE, JR., DAVID LEUSCHEN,
ROBERT TICHIO, JIM
McDERMOTT, JEFFREY TEPPER,
MICHAEL WARREN, RIVERSTONE
INVESTMENT GROUP LLC, WRG
DCRB INVESTORS, LLC and
DECARBONIZATION PLUS
ACQUISITION SPONSOR, LLC,
CRAIG M. KNIGHT, and HYZON
MOTORS INC.,

Defendants.

**AFFIDAVIT OF RAFFI MELANSON IN SUPPORT OF NOTICE OF
INTENT TO APPEAR AND OBJECTION TO SETTLEMENT BY
FEDERAL CLASS ACTION LEAD PLAINTIFF DR. ALFRED MILLER**

I, Raffi Melanson, declare:

1. I am a partner of the law firm Hagens Berman Sobol Shapiro LLP, attorneys for the federally appointed Lead Plaintiff in the related federal litigation against Defendant Decarbonization Plus Acquisition Corporation (“DCRB”)¹ and Hyzon Motors, Inc. (“Hyzon”) (the “Federal Action”). Based on personal knowledge or discussions with counsel in my firm, if called upon, I could and would competently testify on the following matters in support of Dr. Miller’s Notice of Intent to Appear and Objection to Settlement by Federal Class Action Lead Plaintiff Dr. Alfred Miller:

2. Attached hereto as **Exhibit A** is a true and correct copy of the Motion for Leave to File Fourth Amended Complaint (ECF No. 125).

3. Attached hereto as **Exhibit B** is a true and correct copy of the [Proposed] Fourth Amended Complaint (ECF No. 126-1).

4. Attached hereto as **Exhibit C** is a true and correct copy of a letter sent on June 18, 2025.

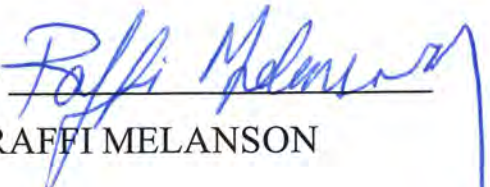
5. Attached hereto as **Exhibit D** is a true and correct copy of Dr. Miller’s trades in DCRB common stock and warrants.

6. Attached hereto as **Exhibit E** is a true and correct copy of a complaint filed by the U.S. Securities and Exchange Commission against Hyzon and certain Hyzon executives in *SEC v. Hyzon Motors Inc. et al*, No. 23-6533 (W.D.N.Y.).

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

¹ *In re Hyzon Motors Inc. Sec. Litig.*, No. 6:21-cv-06612-MAV-MWP (W.D.N.Y.).

Dated: September 19, 2025

By 
RAFFI MELANSON

COMMONWEALTH OF MASSACHUSETTS)

SUFFOLK COUNTY)

Subscribed and sworn to (or affirmed) before me on this 19 day of September 2025, Raffi Melanson proved to me on the basis of satisfactory evidence to be the person who appeared before me.



Notary Public Signature

Printed Name: Syed Esa Inzemam

In and for the State of Massachusetts

My County of Residence: Suffolk

My Commissions Expires: July 12 2030

