

EXHIBIT 1

Updated Exhibit 1
 SEC v. Bivona
 Palantir Share Shortage Analysis

Telesoft

Close Date (1)	Telesoft										Exhibit 2				
	Felix Multi- Opportunity Fund I, LLC	Felix Multi- Opportunity Fund II, LLC	NYPA Fund I LLC	NVPA Fund II LLC	SRA I LLC	SRA II LLC	SRA III LLC	CSG IV	Fortuna Fund I LLC	Global Generation Group LLC	Royal Farms Inc.	Grand Total	a	b	a-b
12/14/11	74,456	704,816							933,333		317,460	1,712,606	3,100,000	1,712,606	1,387,394
12/28/11											317,460	317,460	3,100,000	2,030,066	1,069,934
01/10/12		46,000									46,000	46,000	3,100,000	2,076,066	1,023,934
04/24/12	100,587	413,533									369,489	883,609	4,600,000	2,959,675	1,640,325
05/23/12		114,519	287,778	123,148							100,000	625,444	4,600,000	3,585,119	1,014,881
06/15/12											541,667	541,667	4,600,000	4,126,786	473,214
06/22/12			108,859	17,719							126,578	126,578	4,600,000	4,253,364	345,636
07/10/12			74,074								74,074	74,074	4,600,000	4,327,438	272,562
07/22/12				8,519							8,519	8,519	4,600,000	4,335,957	264,043
08/15/12				9,259							9,259	9,259	4,600,000	4,345,216	254,784
10/25/12			45,659	8,519							54,178	54,178	4,600,000	4,399,394	200,606
02/08/13			131,932	20,311							152,243	152,243	4,600,000	4,551,637	48,363
04/26/13			328,238	60,572							388,810	388,810	4,600,000	4,940,447	340,447
06/04/13			84,799	13,571							13,571	13,571	4,600,000	4,954,019	154,919
06/10/13			14,706	202,963							287,753	287,753	4,600,000	4,411,771	441,771
06/13/13											14,706	14,706	4,600,000	5,258,477	456,477
06/18/13											(33,333)	(33,333)	4,600,000	5,225,144	423,144
06/21/13											(33,333)	(33,333)	4,600,000	5,189,810	389,810
06/24/13											(25,000)	(25,000)	4,600,000	5,164,810	364,810
07/01/13											(16,667)	(16,667)	4,600,000	5,148,144	348,144
07/03/13											(16,667)	(16,667)	4,600,000	5,131,477	331,477
07/09/13											(16,667)	(16,667)	4,600,000	5,114,810	314,810
07/12/13											(16,667)	(16,667)	4,600,000	5,098,144	298,144
09/05/13			161,796	60,312							221,108	221,108	4,600,000	5,320,251	520,251
10/08/13			29,383	121,343							150,727	150,727	4,600,000	5,470,978	670,978
10/18/13											(166,667)	(166,667)	4,600,000	5,304,311	504,311
10/31/13											(8,824)	(8,824)	4,600,000	5,295,487	495,487
11/15/13			(6,786)								(6,786)	(6,786)	4,600,000	5,288,702	488,702
11/22/13											(100,000)	(100,000)	4,600,000	5,188,702	411,298
11/25/13			43,324	540,780							584,103	584,103	4,600,000	5,772,805	472,805
11/27/13											(100,000)	(100,000)	4,600,000	5,672,805	372,805
12/03/13					28,425						28,425	28,425	4,600,000	5,701,230	401,230
12/09/13					7,350						7,350	7,350	4,600,000	5,708,580	408,580
02/04/14					40,497						40,497	40,497	4,600,000	5,749,076	449,076
03/04/14					2,450						2,450	2,450	4,600,000	5,751,526	451,526
03/05/14						227,000					227,000	227,000	4,600,000	5,978,526	678,526
03/12/14			24,881	159,784							184,665	184,665	4,600,000	6,163,192	763,192
03/13/14					211,280	4,900					216,180	216,180	4,600,000	6,379,371	779,371
03/21/14					15,031						15,031	15,031	4,600,000	6,394,403	794,403
04/22/14											(2,941)	(2,941)	4,600,000	6,391,462	791,462

Updated Exhibit 1
SEC v. Bivona
Palantir Share Shortage Analysis

Close Date (1)	Telesoft										Palantir Shares Available	Overage / (Shortfall)			
	Felix Multi-Opportunity Fund I, LLC	Felix Multi-Opportunity Fund II, LLC	NYPA Fund I LLC	NYPA Fund II LLC	SRA I LLC	SRA II LLC	SRA III LLC	CSG IV	Fortuna Fund I LLC	Global Generation Group LLC			Royal Farms Inc.	Grand Total	
06/03/14						209,350						209,350	6,500,812	6,150,000	(450,812)
06/27/14					24,769	22,280						47,049	6,647,861	6,250,000	(397,861)
07/16/14		(248,275)										(248,275)	6,399,586	6,250,000	(149,586)
07/17/14	(41,000)											(51,000)	6,348,586	6,250,000	(98,586)
07/28/14		37,692			25,538	155,734	17,643					236,607	6,585,194	6,400,000	(185,194)
07/30/14					59,596							3,286	6,588,479	6,400,000	(188,479)
08/07/14						51,057	7,143					117,795	6,706,275	6,605,000	(101,275)
08/28/14					81,995	13,571	12,000					12,000	6,718,275	6,705,000	(13,275)
09/15/14					6,786	28,624	5,226					35,409	6,854,417	6,642,411	(212,006)
10/22/14													6,864,525	6,705,000	(159,525)
10/30/14						172,143	10,108					10,108	6,864,525	6,612,411	(252,114)
11/12/14													6,890,065	6,890,065	(145,603)
11/17/14					137,721	206,571						137,721	7,036,668	7,213,781	(29,458)
11/20/14						1,840	89,356					89,356	7,470,112	7,213,781	(256,331)
11/21/14	(2,044)				35,714	16,000	9,446					61,161	7,531,273	7,213,781	(317,492)
12/11/14					6,571		833					7,405	7,538,678	7,213,781	(324,897)
01/05/15						2,300	13,890					16,190	7,554,868	7,180,926	(373,942)
01/15/15					17,857	17,857	15,143					31,000	7,585,868	7,180,926	(404,942)
02/24/15					3,280							3,280	7,589,148	7,180,926	(408,222)
03/30/15							8,333					8,333	7,597,481	7,266,474	(331,007)
03/31/15						(3,571)						(3,571)	7,593,910	7,266,474	(327,436)
04/06/15					3,407							3,407	7,597,317	7,266,474	(330,843)
04/07/15					13,630							13,630	7,610,947	7,190,419	(420,528)
04/09/15							3,000					3,000	7,613,947	7,190,419	(423,528)
04/27/15						245,000	20,000					265,000	7,878,947	7,190,419	(688,528)
06/16/15										(650,000)		(650,000)	6,810,419	6,830,063	(19,644)
06/25/15					8,000							8,000	6,830,063	6,830,063	(398,884)
06/26/15							5,935					5,935	6,830,063	6,830,063	(412,819)
07/13/15							38,331					38,331	6,869,329	6,869,329	(411,884)
07/28/15					5,000		14,000					19,000	6,869,329	6,869,329	(425,884)
07/31/15						10,625	38,454					49,079	6,869,329	6,869,329	(479,964)
08/04/15					157,667	57,244						214,911	7,153,431	7,153,431	(410,773)
08/18/15							4,148					4,148	7,153,431	7,153,431	(414,921)
08/19/15							3,000					3,000	7,153,431	7,153,431	(417,921)
08/28/15					87,508	104,330	136,784					328,623	7,899,974	7,153,431	(746,543)
09/01/15					23,824							23,824	7,923,798	7,209,355	(714,443)
09/28/15													7,930,414	7,209,355	(721,059)
10/01/15					20,000	50,000	65,000					135,000	8,065,414	7,299,355	(766,059)
11/11/15															

Updated Exhibit 1
 SEC v. Bivona
 Palantir Share Shortage Analysis

Telesoft

Close Date (1)	Telesoft											Exhibit 2		
	Felix Multi- Opportunity Fund I, LLC	Felix Multi- Opportunity Fund II, LLC	NYPA Fund I LLC	NYPA Fund II LLC	SRA I LLC	SRA II LLC	SRA III LLC	CSG IV	Fortuna Fund I LLC	Global Generation Group LLC	Royal Farms Inc.	Grand Total	a	a-b
11/12/15					26,903		6,000					32,903	7,299,355	(798,962)
11/16/15					7,381		1,897					9,277	7,299,355	(808,240)
12/15/15							4,581					4,581	7,318,865	(793,310)
12/30/15	(125,120)						6,575					6,575	6,740,249	(1,378,502)
02/01/16		(599,579)	(592,842)	(192,684)								(1,510,226)	6,740,249	131,724
02/02/16			(68,574)							(209,127)		(209,127)	6,398,398	340,851
02/11/16												(68,574)	5,740,249	(590,575)
02/29/16											(45,000)	(45,000)	5,740,249	(545,575)
03/03/16												55,570	5,740,249	(601,145)
03/07/16				(20,571)								(20,571)	5,740,249	(580,574)
03/09/16					(10,000)							(10,000)	5,740,249	(570,574)
03/11/16						20,000						20,000	5,740,249	(590,574)
Grand Total	49,923	679,289	624,184	901,186	1,030,270	1,389,135	541,444	227,000	55,570	408,333	424,489	6,330,823	5,740,249	(590,574)

EXHIBIT 2

Updated Exhibit 2

SEC v. Bivona

Palantir Shares Held - By Date

Date Issued	Shares Acquired/Sold	Cumulative Shares Available
11/14/11	100,000	100,000
11/15/11	3,000,000	3,100,000
02/24/12	1,500,000	4,600,000
05/30/13	200,000	4,800,000
11/19/13	500,000	5,300,000
03/06/14	405,000	5,705,000
03/07/14	145,000	5,850,000
03/12/14	100,000	5,950,000
03/25/14	100,000	6,050,000
05/29/14	100,000	6,150,000
06/05/14	100,000	6,250,000
07/23/14	80,000	6,330,000
07/24/14	70,000	6,400,000
07/31/14	100,000	6,500,000
08/04/14	30,000	6,530,000
08/07/14	75,000	6,605,000
08/28/14	100,000	6,705,000
09/18/14	(62,589)	6,642,411
10/23/14	(30,000)	6,612,411
10/31/14	(10,000)	6,602,411
11/03/14	(37,346)	6,565,065
11/07/14	325,000	6,890,065
11/17/14	323,716	7,213,781
12/17/14	(32,855)	7,180,926
02/26/15	12,500	7,193,426
02/27/15	(3,285)	7,190,141
03/10/15	75,000	7,265,141
03/20/15	60,000	7,325,141
03/30/15	(58,667)	7,266,474
04/07/15	(76,055)	7,190,419
04/14/15	20,000	7,210,419
04/21/15	100,000	7,310,419
04/24/15	(500,000)	6,810,419
05/08/15	19,644	6,830,063
07/03/15	39,266	6,869,329
08/01/15	114,285	6,983,614
08/14/15	169,817	7,153,431
09/09/15	55,924	7,209,355
11/04/15	90,000	7,299,355
12/03/15	19,510	7,318,865
12/23/15	(578,616)	6,740,249
02/05/16	(1,000,000)	5,740,249
Grand Total	5,740,249	

EXHIBIT A

Updated Exhibit 2-A

SEC v. Bivona

Total Sourced Palantir Shares (Per Palantir and other data)

Cert#	# of Shares	Date Closed (Issuance)	Name ON Cap Table (Holder)
-------	-------------	---------------------------	-------------------------------

1. Confirmed Certificates in the name of CSG:

CSA-8	100,000	11/14/11	Clear Sailing Group IV, LLC
CSA-9	1,000,000	11/15/11	Clear Sailing Group IV, LLC
CSA-10	1,000,000	11/15/11	Clear Sailing Group IV, LLC
CSA-11	131,400	11/15/11	Clear Sailing Group IV, LLC
CSA-12	868,600	11/15/11	Clear Sailing Group IV, LLC
CSA-31	166,250	02/24/12	Clear Sailing Group IV, LLC
CSA-32	208,750	02/24/12	Clear Sailing Group IV, LLC
CSA-33	375,000	02/24/12	Clear Sailing Group IV, LLC
CSA-34	375,000	02/24/12	Clear Sailing Group IV, LLC
CSA-35	375,000	02/24/12	Clear Sailing Group IV, LLC
CSA-230	200,000	05/30/13	Clear Sailing Group IV, LLC
CSA-435	200,000	03/06/14	Clear Sailing Group IV, LLC
CSA-436	140,371	03/06/14	Clear Sailing Group IV, LLC
CSA-437	64,629	03/06/14	Clear Sailing Group IV, LLC
CSA-438	145,000	03/07/14	Clear Sailing Group IV, LLC
CSA-440	100,000	03/12/14	Clear Sailing Group IV, LLC
CSA-458	90,000	03/25/14	Clear Sailing Group IV, LLC
CSA-459	10,000	03/25/14	Clear Sailing Group IV, LLC
CSA-586	95,000	05/29/14	Clear Sailing Group IV, LLC
CSA-587	5,000	05/29/14	Clear Sailing Group IV, LLC
CSA-590	100,000	06/05/14	Clear Sailing Group IV, LLC
CSA-626	13,334	07/23/14	Clear Sailing Group IV, LLC
CSA-627	36,041	07/23/14	Clear Sailing Group IV, LLC
CSA-628	30,625	07/23/14	Clear Sailing Group IV, LLC
CSA-629	37,647	07/24/14	Clear Sailing Group IV, LLC
CSA-630	32,353	07/24/14	Clear Sailing Group IV, LLC
CSA-646	100,000	07/31/14	Clear Sailing Group IV, LLC
CSA-652	30,000	08/04/14	Clear Sailing Group IV, LLC
CSA-655	75,000	08/07/14	Clear Sailing Group IV, LLC
CSA-684	100,000	08/28/14	Clear Sailing Group IV, LLC
CSA-823	65,000	11/07/14	Clear Sailing Group IV, LLC
CSA-824	11,316	11/07/14	Clear Sailing Group IV, LLC
CSA-825	15,000	11/07/14	Clear Sailing Group IV, LLC
CSA-826	233,684	11/07/14	Clear Sailing Group IV, LLC
CSA-832	40,000	11/17/14	Clear Sailing Group IV, LLC
CSA-833	37,100	11/17/14	Clear Sailing Group IV, LLC
CSA-834	40,000	11/17/14	Clear Sailing Group IV, LLC
CSA-835	59,800	11/17/14	Clear Sailing Group IV, LLC
CSA-836	18,816	11/17/14	Clear Sailing Group IV, LLC
CSA-837	10,000	11/17/14	Clear Sailing Group IV, LLC
CSA-838	40,000	11/17/14	Clear Sailing Group IV, LLC
CSA-839	28,000	11/17/14	Clear Sailing Group IV, LLC
CSA-840	20,000	11/17/14	Clear Sailing Group IV, LLC
CSA-841	30,000	11/17/14	Clear Sailing Group IV, LLC
CSA-989	12,500	02/26/15	Clear Sailing Group IV, LLC
CSA-995	45,000	03/10/15	Clear Sailing Group IV, LLC
CSA-996	30,000	03/10/15	Clear Sailing Group IV, LLC
CSA-1011	60,000	03/20/15	Clear Sailing Group IV, LLC
CSA-1474	(578,616)	12/23/15	Clear Sailing Group IV, LLC
CSA-8	<u>(1,000,000)</u>	02/05/16	Clear Sailing Group IV, LLC
	5,422,600		

Updated Exhibit 2-A

SEC v. Bivona

Total Sourced Palantir Shares (Per Palantir and other data)

Cert#	# of Shares	Date Closed (Issuance)	Name ON Cap Table (Holder)	
2. GCM-PLT Shares Purchased and Sold by CSG:				
	22,368	11/19/13	GCM-PLT	CSG IV purchased GCM-PLT, LLC (1)
	477,632	11/19/13	GCM-PLT	CSG IV purchased GCM-PLT, LLC (1)
	(22,368)	04/24/15	GCM-PLT	CSG IV sold GCM-PLT, LLC to Edgewater (1)
	<u>(477,632)</u>	04/24/15	GCM-PLT	CSG IV sold GCM-PLT, LLC to Edgewater (1)
3. Shares for Silverback Funds held by CSG:				
	(54,256)	09/18/14	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(8,333)	09/18/14	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(30,000)	10/23/14	Clear Sailing Group IV, LLC	Silverback Fund II LTD (2)
	(10,000)	10/31/14	Clear Sailing Group IV, LLC	Silverback Fund II LTD (2)
	(28,571)	11/03/14	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(5,914)	11/03/14	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(2,861)	11/03/14	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(26,285)	12/17/14	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(6,570)	12/17/14	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(3,285)	02/27/15	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	(128,667)	03/30/15	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	<u>(76,055)</u>	04/07/15	Clear Sailing Group IV, LLC	Silverback Fund I SPC (2)
	<u>(380,797)</u>			
4. Shares for Receivership Entities held by EAC:				
	70,000	03/30/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	20,000	04/14/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	100,000	04/21/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	19,644	05/08/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	39,266	07/03/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	114,285	08/01/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	169,817	08/14/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	55,924	09/09/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	90,000	11/04/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	<u>19,510</u>	12/03/15	Equity Acquisition Company Ltd.	Exhibit 2-B
	<u>698,446</u>			

Total Available 5,740,249

Source:

- PAL-1 - FOIA Confidential Treatment Requested by Palantir Technologies Inc.xlsx
- PAL-0000002 - FOIA Confidential Treatment Requested by Palantir Technologies Inc.xlsx
- EXECUTED GCM to CSG IV Palantir 500K shares Membership Interest Purchase Agreement (NF003359-3370)
- EXECUTED CSG IV to Edgewater Global Palantir 500K shares Membership Interest Purchase Agreement
- Palantir stock certificates issued to GCM-PLT, LLC

(1) Used bank clearing date

(2) From What is owed EAC-SB V3.xlsx

EXHIBIT B

Updated Exhibit 2-B

SEC v. Bivona

Palantir Shares Held by EAC for Receivership Entities

Per Palantir Confirmation					Per EAC	
Cert#	# of Shares	Date Closed (Issuance)	Name ON Cap Table (Holder)	Outstanding Shares as of April 14, 2016	Shares Allocated to SRA Funds (1)	
CSA-1014	70,000	03/30/15	Equity Acquisition Company Ltd.	70,000	70,000	SRA II
CSA-1140	20,000	04/14/15	Equity Acquisition Company Ltd.	20,000	20,000	SRA II
CSA-1142	100,000	04/21/15	Equity Acquisition Company Ltd.	100,000	100,000	SRA II
CSA-1172	19,000	05/08/15	Equity Acquisition Company Ltd.	19,000	19,644	SRA II
CSA-1173	6,000	05/08/15	Equity Acquisition Company Ltd.	6,000		
CSA-1198	15,000	06/07/15	Equity Acquisition Company Ltd.	15,000		
CSA-1209	54,000	06/17/15	Equity Acquisition Company Ltd.	54,000		
CSA-1210	12,000	06/17/15	Equity Acquisition Company Ltd.	12,000		
CSA-1211	34,800	06/17/15	Equity Acquisition Company Ltd.	34,800		
CSA-1255	200,000	07/03/15	Equity Acquisition Company Ltd.	200,000	39,266	SRA III
CSA-1256	27,140	07/07/15	Equity Acquisition Company Ltd.	27,140		
CSA-1283	112,860	08/01/15	Equity Acquisition Company Ltd.	112,860	114,285	SRA I, II, III
CSA-1284	60,000	08/01/15	Equity Acquisition Company Ltd.	60,000		
CSA-1292	170,000	08/14/15	Equity Acquisition Company Ltd.	170,000	169,817	SRA I, III
CSA-1311	63,000	09/09/15	Equity Acquisition Company Ltd.	63,000	55,924	SRA III
CSA-1312	7,000	09/09/15	Equity Acquisition Company Ltd.	7,000		
CSA-1431	90,000	11/04/15	Equity Acquisition Company Ltd.	90,000	90,000	SRA I, II, III
CSA-1452	20,000	12/03/15	Equity Acquisition Company Ltd.	20,000	19,510	SRA III
CSA-1560	40,000	02/24/16	Equity Acquisition Company Ltd.	40,000		
CSA-1564	2,142	02/29/16	Equity Acquisition Company Ltd.	2,142		
CSA-1565	34,819	02/29/16	Equity Acquisition Company Ltd.	34,819		
CSA-1563	34,820	02/29/16	Equity Acquisition Company Ltd.	34,820		
CSA-1589	20,000	04/01/16	Equity Acquisition Company Ltd.	20,000		
CSA-1590	10,000	04/01/16	Equity Acquisition Company Ltd.	10,000		
CSA-1591	15,000	04/05/16	Equity Acquisition Company Ltd.	15,000		
CSA-1592	10,500	04/08/16	Equity Acquisition Company Ltd.	10,500		
	<u>1,248,081</u>			<u>1,248,081</u>	<u>698,446</u>	

Source:

- PAL-0000002 - FOIA Confidential Treatment Requested by Palantir Technologies Inc.xlsx

- LONG SHEET - ANDREA.xlsx

(1) Total Palantir shares held by EAC for Fortuna Fund is 108,540

1 JINA L. CHOI (N.Y. Bar No. 2699718)
JOHN S. YUN (Cal. Bar No. 112260)
2 yunj@sec.gov
MARC D. KATZ (Cal. Bar No. 189534)
3 katzma@sec.gov
JESSICA W. CHAN (Cal. Bar No. 247669)
4 chanjes@sec.gov

5 Attorneys for Plaintiff
SECURITIES AND EXCHANGE COMMISSION
6 44 Montgomery Street, Suite 2800
San Francisco, CA 94104
7 Telephone: (415) 705-2500
Facsimile: (415) 705-2501
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 SECURITIES AND EXCHANGE COMMISSION,

13 Plaintiff,

14 v.

15 JOHN V. BIVONA; SADDLE RIVER
ADVISORS, LLC; SRA MANAGEMENT
16 ASSOCIATES, LLC; FRANK GREGORY
MAZZOLA,

17 Defendants, and

18 SRA I LLC; SRA II LLC; SRA III LLC;
19 FELIX INVESTMENTS, LLC; MICHELE
J. MAZZOLA; ANNE BIVONA; CLEAR
20 SAILING GROUP IV LLC; CLEAR
SAILING GROUP V LLC,

21 Relief Defendants.
22
23
24
25
26
27
28

Case No. 3:16-cv-01386-EMC

**SUPPLEMENTAL DECLARATION OF M.
MONICA IP, CPA IN SUPPORT OF
PLAINTIFF'S MOTION ESTABLISHING
SHORTFALLS**

Date: July 16, 2018
Time: 1:30 pm
Courtroom: 5
Judge: Edward M. Chen

1 I, M. Monica Ip, declare as follows:

2 I have personal knowledge of the matters stated herein. If called and sworn as a witness, I
3 could and would competently testify under oath thereto.

4 **I. Assignment**

5 On 6/28/17, I issued a declaration in support of the Securities Exchange Commission's ("SEC")
6 Motion for Approval of the Receiver's Distribution Plan in the SEC v. John V. Bivona, et al.
7 litigation. Since then, I have been provided additional documents and I have updated my
8 Palantir pre-IPO share shortfall analysis through 3/11/16, the date of the last known investor
9 purchase/redemption relating to Palantir. I have been asked to prepare this declaration to
10 explain my updated analysis.

11 **II. Additional Documents Considered**

12 1. Since my previous declarations, I have been provided the following documents that are
13 relevant to the Palantir shortfall analysis:

- 14 i. Palantir Sale.xlsx: This Excel file shows sales of Palantir-related investments by
15 investors in February 2016. This file allowed me to confirm that investors that had
16 dropped off from the February 2016 Investor Lists had in fact redeemed their shares.
17 In addition, this document identifies two additional redemptions not previously
18 known.
- 19 ii. LONG SHEET – ANDREA.xlsx: This file contains multiple tabs, one of which is
20 related to Palantir. The Palantir tab appears to be an accounting of Palantir shares
21 purchased by CSG IV and allocated to various investment series. It also shows
22 Palantir shares that had been redeemed from investors and reallocated to subsequent
23 investors. In addition, it also shows Palantir shares acquired by Equity Acquisition
24 Company, Ltd, ("EAC") and allocated to the Receivership Entities and other entities.
25 Using this document, I (a) identified an investor who was not on the Investor Lists, (b)
26 verified Palantir shares held by EAC that belonged to the Receivership Entities, (c)
27 verified shares held by CSG IV for Fortuna Fund I ("Fortuna"), and (d) located
28

1 redemptions, which I was previously unaware of, by Fortuna investors of Palantir
2 shares.

3 iii. What is owed EAC-SB V3.xlsx: This file shows Palantir shares held by CSG IV for
4 the Silverback Funds by investment series. This document provides information on
5 shares held by CSG IV that did not belong to the Receivership Entities and were not
6 available to the Receivership Entities. The number of Palantir shares held by CSG IV
7 for the Silverback Funds per this document reconciles with information in LONG
8 SHEET – ANDREA.xlsx.

9 **III. Palantir Shares Required**

10 2. As reflected in Exhibit 1 to my 6/28/17 declaration, as of 11/16/15, the Receivership
11 Entities required 8,093,596 shares of Palantir. Using the documents discussed above, I
12 updated the shares required analysis through 3/11/16. As seen in the attached Updated
13 Exhibit 1, the Receivership Entities required 6,330,823 shares of Palantir as of 3/11/16.

14 3. I have prepared an Updated Exhibit 10, which details all investor purchase and sale
15 transactions that are considered in the shares required analysis. It is my understanding
16 that this Updated Exhibit 10 will not be filed with my declaration in the court records
17 because the Updated Exhibit 10 contains an extensive amount of confidential investor
18 information. Instead, the SEC will provided a copy of the Updated Exhibit 10 directly to
19 the Court's staff or other counsel upon request.

20 **IV. Shares Available**

21 4. As reflected in Exhibits 2 to my 6/28/17 declaration, as of 3/7/16, there were 6,141,046
22 Palantir shares available to the Receivership Entities. As previously stated, I have since
23 updated my shares available analysis by considering additional documents. Specifically, I
24 relied on LONG SHEET – ANDREA.xlsx to determine Palantir shares held by EAC for
25 the Receivership Entities.¹ In addition, I accounted for shares held by CSG IV for the
26

27 ¹ I previously relied on What is long for SRA.xlsx for shares held by EAC for the Receivership Entities.
28

1 Silverback Funds which I had not previously considered. As such, the number of shares
2 available for the Receivership Entities is reduced.

- 3 5. As seen in Updated Exhibit 2, as of 2/5/16, the date of the last known transaction, there
4 were 5,740,249 shares available for the Receivership Entities. I have assumed that the
5 same number of shares were available through 3/11/16, the end of my share shortage
6 analysis.
- 7 6. Updated Exhibit 2-A is a list of all transactions considered in determining shares available
8 to the Receivership Entities. The format of Updated Exhibit 2-A has been modified from
9 the original Exhibit 2-A for ease of use. Updated Exhibit 2-A has the following four
10 sections:
- 11 i. Section 1 details Palantir shares purchased and sold by CSG IV as confirmed by
12 Palantir Technologies Inc. As seen in Updated Exhibit 2-A, CSG IV held 5,422,600
13 shares of Palantir, as of 4/14/16, the date of the confirmation.
- 14 ii. Section 2 details Palantir shares purchased by CSG IV from GCM-PLT, LLC on
15 11/19/13 and subsequently sold to Edgewater Global Capital Limited on 4/24/15. As
16 such, these additional 500,000 shares were available to the Receivership Entities from
17 11/19/13 through 4/23/15. Since these shares were held in the name of GCM-PLT,
18 LLC, they are not included in Palantir Technologies Inc.'s confirmation and not
19 included in Section 1 of Updated Exhibit 2-A.
- 20 iii. Section 3 details Palantir shares held by CSG IV for the Silverback Funds. These
21 shares were purchased by CSG IV and allocated by CSG IV to the Silverback Funds,
22 and therefore were not available for distribution to the Receivership Entities'
23 investors. I determined the number of shares held by CSG IV for the Silverback
24 Funds using What is owed EAC-SB V3.xlsx and LONG SHEET – ANDREA.xlsx.
25 As seen in Updated Exhibit 2-A, these shares, totaling 380,797, are deducted from
26 shares held by CSG IV.
- 27
28

- 1 iv. Section 4 details Palantir shares held by EAC for the Receivership Entities as reflected
2 in LONG SHEET – ANDREA.xlsx. These shares were purchased by EAC and
3 allocated by EAC to the Receivership Entities (See Updated Exhibit 2-B). As such,
4 698,446 shares held by EAC are supposed to be available to the Receivership Entities
5 for its investors.
- 6 v. Based on my analysis, 5,740,249 shares of Palantir were available to the Receivership
7 Entities as of 3/11/16.

8 **V. Share Shortage**

- 9 7. As seen in Updated Exhibit 1, as of 3/11/16, there was a shortage of 590,574 shares of
10 Palantir. This assumes, however, that the Receivership Entities are in fact able to
11 distribute the 5,740,249 Palantir shares that should be available to the Receivership
12 Entities according to my analysis in Updated Exhibit 2-A. If EAC does not deliver the net
13 amount of 317,649 Palantir shares owed to the Receivership Entities (after netting
14 380,797 shares CSG IV held for the Silverback Funds and 698,446 shares EAC held for
15 the Receivership Entities), then the shortage of Palantir shares would increase
16 accordingly.

17 **VI. Progresso Ventures, LLC (“Progresso”)**

- 18 8. As stated in my 6/28/17 declaration, FB Management borrowed \$4,000,000 from
19 Progresso in February 2011 and \$2,939,327.50 of the loan was subsequently repaid. It
20 appears the loan proceeds were used to acquire Palantir shares.
- 21 9. According to my preliminary analysis, if the Progresso transactions are valued at \$3 per
22 share, both the number of shares required and the share shortage would increase by
23 503,558.
- 24
25
26
27
28

	Date	Transaction Amount	Price per Share	Palantir Shares Required
Loan	11/10/11	\$ 4,450,000.00	\$ 3.00	1,483,333
Repayment	05/25/12	(1,100,000.00)	3.00	(366,667)
Repayment	06/15/12	(1,354,167.50)	3.00	(451,389)
Repayment	07/02/12	(320,160.00)	3.00	(106,720)
Repayment	07/12/12	(165,000.00)	3.00	(55,000)
		<u>\$ 1,510,672.50</u>		<u>503,558</u>

10. Similarly, if the Progresso transactions are valued at \$2.10 per share, both the number of shares required and the share shortage would increase by 719,368.

	Date	Transaction Amount	Price per Share	Palantir Shares Required
Loan	11/10/11	\$ 4,450,000.00	\$ 2.10	2,119,048
Repayment	05/25/12	(1,100,000.00)	2.10	(523,810)
Repayment	06/15/12	(1,354,167.50)	2.10	(644,842)
Repayment	07/02/12	(320,160.00)	2.10	(152,457)
Repayment	07/12/12	(165,000.00)	2.10	(78,571)
		<u>\$ 1,510,672.50</u>		<u>719,368</u>

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on the 28th day of June, 2018, at Redwood City, California.



M. Monica Ip, CPA