UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEVIN D. MEYER, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. UNITED MICROELECTRONICS CORPORATION, SHAN-CHIEH CHIEN, JASON WANG, PO-WEN YEN, and CHITUNG LIU, Defendants.	No. 19-cv-02304-VM CLASS ACTION

DECLARATION OF MARK NELSON IN SUPPORT OF UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT

I, Mark Nelson, hereby declare as follows:

1. I, Mark Nelson, the lead plaintiff in the above action ("Lead Plaintiff"), respectfully submit this Declaration in support of our Unopposed Motion for Preliminary Approval of Proposed Class Action Settlement. I have personal knowledge about the information in this Declaration. Unless otherwise defined, capitalized terms herein have the same meaning as set forth in the Stipulation of Settlement, dated June 30, 2020 (the "Stipulation"), attached as Exhibit 1 to the accompanying Declaration of Gregory M. Nespole.

2. As Lead Plaintiff, I routinely communicated with my attorneys at Levi & Korsinsky, LLP about the litigation, in particular with Mr. Nespole. I also routinely reviewed the various pleadings and motions filed in this action.

3. In late November 2019, I was informed that Defendants' Counsel and Lead Counsel were exploring the possibility of resolving the Action through mediation. In December 2019, I was informed that Defendants' Counsel and Lead Counsel agreed to retain a mediator to help facilitate

settlement discussions. I was consulted concerning the decision to mediate the case prior to the session and concurred with the decision.

4. I reviewed a draft of my mediation statement and offered comments and revisions, including providing charts and data concerning trends in the DRAM industry. I made myself available by telephone and email during the mediation and when the Parties agreed to accept, in principle, the Mediator's recommendation to settle all claims in the Action for $3,000,000.

5. I am aware that UMC faces a series of issues, including being under indictment in both the United States and Taiwan and being named as a defendant is a lawsuit commenced by Micron Technology, Inc. for theft of trade secrets.

6. I understand that the settlement amount is less than the total possible damages that could result from the claims in this Action being proven at trial.

7. I nevertheless believe that the proposed settlement presents a favorable outcome for the class as it secures an immediate benefit for stockholders given the risks of proving liability against UMC, the uncertainty inherent in any litigation, the possibility of adverse rulings on appeal, and the costs and difficulties in litigating this case and collecting any resulting judgment against Defendants and in particular against those Defendants who are located outside the United States.

8. Accordingly, I authorized Levi & Korsinsky to accept the mediator's settlement proposal, which was later memorialized in the Stipulation and Agreement of Settlement.

9. I understand that if approved by the Court, the settlement will resolve this matter in its entirety against Defendants and restore a substantial sum of money to investors who suffered damages as a result of the alleged fraud. The Court should grant the motion and preliminarily approve the settlement so that notice can be sent to the rest of the class and the Court can schedule a final approval hearing to determine once and for all whether the settlement should be confirmed.

10. I understand that Levi & Korsinsky intends to request an award for attorneys' fees not to exceed 30% of the settlement fund to compensate the firm for its time, risk, and effort in litigating the Action against the Defendants. I further understand that Levi & Korsinsky intends to seek reimbursement of expenses incurred in litigating the Action not to exceed $75,000. I believe that the outcome Levi & Korsinsky achieved in this Action supports the attorneys' fees and reimbursement of expenses they intend to seek.

11. I remain ready, willing, and able to continue to represent the interests of the class throughout the settlement process.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of July 2020.

Mark Nelson