



Sravan Puttagunta &lt;sravan.puttagunta@gmail.com&gt;

## Notice of Material Disclosure Obligation Re: Tainted Asset Title and Regulatory Referral

4 messages

**Sravan Puttagunta** <sravan.puttagunta@gmail.com>

Fri, Oct 31, 2025 at 10:31 PM

To: Anuj Gupta <apowerinfinity@gmail.com>, Jason Creadore <jason.a.creadore@gmail.com>, "Talarides, Alex" <atarides@orrick.com>, "Scott, M. Todd" <tscott@orrick.com>

Dear Luminar Counsel,

This communication puts you on formal notice that the asset referred to internally as "Project Condor" may be subject to rescission, constructive trust, and/or injunctive relief due to an invalid vote under 8 Del. C. §271, compounded by:

- Selective and undisclosed inducements offered to stockholders in exchange for their consent,
- The refusal of fiduciaries to provide written disclosure to at least 40% of the voting block,
- And the existence of a contemporaneous SEC whistleblower referral regarding the same fact pattern.

These matters are currently the subject of a pending books and records action in the Delaware Court of Chancery, which may result in the invalidation of the transaction and a follow-on plenary action seeking rescissory damages and disgorgement.

As a result, any contemplated sale, transfer, assignment, or hypothecation of the underlying IP, assets, or derivative interests must include full written disclosure of:

- The disputed validity of the underlying asset sale,
- The possibility of injunctive or clawback actions,
- And the taint surrounding both stockholder inducements and board-level conduct.

Failure to disclose such risks to a prospective acquirer or creditor may constitute securities fraud, negligent misrepresentation, or a breach of duty—particularly under applicable SEC rules (17 CFR §240.10b-5), and under Delaware's standards for equitable notice in asset transactions.

You are required to preserve all documentation, communications, and transaction materials related to:

- Board consents and 228(e) notices from June 2022
- Any closing deliverables tied to compensation or releases
- Communications involving employment agreements, inducement grants, or buyer-side due diligence

We reserve all rights.

Sincerely,  
Sravan Puttagunta

**Scott, M. Todd** <tscott@orrick.com>

Sat, Nov 1, 2025 at 11:07 AM

To: Puttagunta Sravan <sravan.puttagunta@gmail.com>

Cc: Gupta Anuj <apowerinfinity@gmail.com>, Creadore Jason <jason.a.creadore@gmail.com>, "Talarides, Alex" <atarides@orrick.com>

Mr. Puttagunta, I do not represent Luminar in this regard. You will need to contact the company directly.

Best,  
Todd

On Oct 31, 2025, at 10:31 PM, Sravan Puttagunta <[sravan.puttagunta@gmail.com](mailto:sravan.puttagunta@gmail.com)> wrote:

[EXTERNAL]

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**Sravan Puttagunta** <[sravan.puttagunta@gmail.com](mailto:sravan.puttagunta@gmail.com)>

Sat, Nov 1, 2025 at 11:15 AM

To: "Scott, M. Todd" <[tscott@orrick.com](mailto:tscott@orrick.com)>

Cc: Gupta Anuj <[apowerinfinity@gmail.com](mailto:apowerinfinity@gmail.com)>, Creadore Jason <[jason.a.creadore@gmail.com](mailto:jason.a.creadore@gmail.com)>, "Talarides, Alex" <[atarides@orrick.com](mailto:atarides@orrick.com)>

Can you please provide me the appropriate point of contact?

Kind regards, Sravan

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**Sravan Puttagunta** <[sravan.puttagunta@gmail.com](mailto:sravan.puttagunta@gmail.com)>

Sat, Nov 1, 2025 at 11:23 AM

To: Anuj Gupta <[apowerinfinity@gmail.com](mailto:apowerinfinity@gmail.com)>, Jason Creadore <[jason.a.creadore@gmail.com](mailto:jason.a.creadore@gmail.com)>, "Talarides, Alex"

<[atarides@orrick.com](mailto:atarides@orrick.com)>, "Scott, M. Todd" <[tscott@orrick.com](mailto:tscott@orrick.com)>, [investors@luminartech.com](mailto:investors@luminartech.com), [corpsec@luminartech.com](mailto:corpsec@luminartech.com), [boardofdirectors@luminartech.com](mailto:boardofdirectors@luminartech.com)

Forwarding notice to potential stakeholders.

Kind regards, Sravan

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