18 Civ. 7253 (NG)(PK)

NOTICE OF CONSENTED TO MOTION OF LEAD PLAINTIFF STRATHCLYDE PENSION FUND'S MOTION FOR PRELIMINARY APPROVAL OF PROPOSED SETTLEMENT

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Nina Gershon, at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza E, Brooklyn, New York, 11201, Lead Plaintiff, the Strathclyde Pension Fund ("Strathclyde"), will respectfully move this Court for entry of an Order, pursuant to FED. R. CIV. P. 23:

- 1. Preliminarily approving the proposed class settlement reached through arms' length mediation and negotiations between the representatives of the parties as memorialized in the Stipulation and Agreement of Settlement attached hereto as Exhibit 1;
- 2. Preliminarily certifying a settlement class and appointing class counsel;
- 3. Scheduling a final settlement hearing to consider final approval of the proposed settlement, the plan of allocation, and the application by Lead Plaintiff and Lead Counsel for an award of attorneys' fees and litigation expenses; and
- 4. Approving the form, content, and manner of distribution of the proposed class Notices and Proof of Claim Form attached as Exhibits A-1, A-2, and A-3 to the proposed Order.

Lead Plaintiffs' Motion is supported by the accompanying memorandum of law, all attendant exhibits, and all other papers and proceedings of record. A Proposed Preliminary Approval Order is attached to this motion. Defendants consent to the relief requested in this motion.

Dated: March 17, 2025 Respectfully submitted,

BARRACK, RODOS & BACINE

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Attorneys for the Strathclyde Pension Fund and Lead Counsel for the Proposed Class

¹ Lead Plaintiff is aware of this Court's individual practices, but given that Defendants consent to this preliminary approval motion and the Parties do not anticipate any further briefing with regard to it, Lead Plaintiff is filing this motion notwithstanding this Court's bundling rule and pre-motion conference rule.