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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

In re GRAÑA Y MONTERO S.A.A. SECURITIES LITIGATION

This Document Relates To:

ALL ACTIONS.

Civil Action No. 2:17-cv-01105-LDH-ST <u>CLASS ACTION</u> NOTICE OF MOTION AND MOTIONS FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION AND AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND AWARD TO PLAINTIFF PURSUANT TO 15 U.S.C. §78u-4(a)(4)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Plaintiffs Treasure Finance Corp. and Marcia Goldberg, on behalf of the Settlement Class, through counsel, will move this Court on December 1, 2020, at 2:00 p.m., before the Honorable LaShann DeArcy Hall, for entry of orders and judgments, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) granting final approval of the proposed Settlement; (2) approving the proposed Plan of Allocation; (3) awarding attorneys' fees, plus expenses in the litigation; and (4) approving an award to Plaintiff Goldberg pursuant to 15 U.S.C. §78u-4(a)(4) in connection with her representation of the Settlement Class. These motions are based on: (i) the Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; (ii) the Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses and Award to Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of David A. Rosenfeld and Corey D. Holzer in Support of Motions for Final Approval of Class Action Settlement and Approval of Plan of Allocation and an Award of Attorneys' Fees and Expenses and Award to Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iv) the Declaration of Marcia Goldberg; (v) the Declaration of Ross D. Murray; (vi) the Declaration of David A. Rosenfeld Filed on Behalf of Robbins Geller Rudman & Dowd LLP; (vii) the Declaration of Corey D. Holzer Filed on Behalf of Holzer & Holzer, LLC; (viii) the Declaration of Curtis V. Trinko Filed on Behalf of Law Offices of Curtis V. Trinko; (ix) the Stipulation and Agreement of Settlement; and (x) all other proceedings herein.

Proposed orders will be submitted with Plaintiffs' reply submission on or before November 24, 2020.

DATED: October 27, 2020

ROBBINS GELLER RUDMAN & DOWD LLP SAMUEL H. RUDMAN DAVID A. ROSENFELD ALAN I. ELLMAN

> s/David A. Rosenfeld DAVID A. ROSENFELD

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Lead Counsel for Plaintiffs

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Additional Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 27, 2020, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such public filing to the all counsel registered to received such notice.

s/ David A. Rosenfeld DAVID A. ROSENFELD