IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

JET CAPITAL MASTER FUND, L.P.)	
v)	No. 21-cv-552-jdp
V.)	No. 21-cv-552-jup
HRG GROUP, INC. ET AL.)	

SPECTRUM CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES

Spectrum Class Counsel, Bernstein Litowitz Berger & Grossmann LLP and Stafford Rosenbaum LLP, in accordance with Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement, dated November 17, 2021 (dkt. 102), will and do hereby move this Court, before the Honorable James D. Peterson, on March 18, 2022 at 10:00 a.m. central time, for entry of an Order awarding attorneys' fees and litigation expenses to Spectrum Class Counsel in the amount of 15% of \$4.785 million of the proposed settlement, plus interest, to be paid from the total amount of attorney's fees awarded in this Action. This motion is based on the accompanying Memorandum of Law in Support of Spectrum Class Counsel's Motion for an Award of Attorneys' Fees; the Declaration of Katherine M. Sinderson in Support of (I) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses filed today in the Spectrum Action (No. 19-cv-347-jdp); and all other papers and proceedings herein. A proposed Order granting the requested relief will be submitted with Spectrum Class Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: February 7, 2022

Respectfully submitted,

<u>/s/Katherine M. Sinderson</u> BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Katherine M. Sinderson, admitted *pro hac vice* Jai Chandrasekhar, admitted *pro hac vice* Matthew Traylor, admitted *pro hac vice* 1251 Avenue of the Americas New York, NY 10020 Telephone: (212) 554-1400 Facsimile: (212) 554-1444 KatieM@blbglaw.com Jai@blbglaw.com Matthew.Traylor@blbglaw.com

-and-

Avi Josefson 875 North Michigan Avenue, Suite 3100 Chicago, Illinois 60611 Telephone: (312) 373-3880 Facsimile: (312) 794-7801 avi@blbglaw.com

Lead Counsel for Spectrum Lead Plaintiffs the Public School Teachers' Pension & Retirement Fund of Chicago and the Cambridge Retirement System and the Spectrum Class

STAFFORD ROSENBAUM LLP

Douglas M. Poland State Bar No. 1055189 222 West Washington Avenue, Suite 900 P.O. Box 1784 Madison, WI 53701-1784 Telephone: (608) 256-0226 Facsimile: (608) 259-2600 dpoland@staffordlaw.com

Liaison Counsel for Spectrum Lead Plaintiffs the Public School Teachers' Pension & Retirement Fund of Chicago and the Cambridge Retirement System and the Spectrum Class

CERTIFICATE OF SERVICE

I, Katherine M. Sinderson, an attorney, hereby certify that a copy of the foregoing **"Spectrum Class Counsel's Motion for an Award of Attorneys' Fees"** was served on counsel for all parties electronically via the CM/ECF system on February 7, 2022.

Dated: February 7, 2022

By: <u>/s/ Katherine M. Sinderson</u> Katherine M. Sinderson

_