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Attorneys for Plaintiff Richard Goodman and the Proposed Settlement Class

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

RICHARD GOODMAN, Individually And As Trustee of the Richard M. Goodman Revocable Living Trust, And On Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

UBS FINANCIAL SERVICES INC.,

Defendant.

Case No.: 2:21-cv-18123-KM-MAH

LEAD PLAINTIFF'S COUNSEL'S NOTICE OF MOTION AND MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

Hon. Michael A. Hammer

Class Action

Motion Day: December 7, 2023

PLEASE TAKE NOTICE that on December 7, 2023, at 11:00 a.m., Plaintiff's Counsel, Glancy Prongay & Murray LLP and Goodman Hurwitz & James, P.C. (collectively, "Plaintiff's Counsel")¹ will, and hereby do, apply to the Honorable Michael A. Hammer, Magistrate Judge for the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, Courtroom MLK 2C, 50 Walnut Street, Newark, NJ 07101, for entry of an Order awarding attorneys' fees and reimbursement of Litigation Expenses.

This motion is based on this Notice of Motion; the concurrently filed Memorandum of Law; Declaration of Garth A. Spencer in Support of (I) Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Plaintiff's Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and records on file in this Action; and other such matters as the Court may consider.²

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated June 8, 2023. ECF No. 55-1.

 $^{^{2}}$ A proposed order will be submitted with Plaintiff's reply papers, after the deadlines for objections and seeking exclusion have passed.

DATED: November 2, 2023

GLANCY PRONGAY & MURRAY LLP

By: <u>/s/ Lee Albert</u>

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Attorneys for Plaintiff Richard Goodman and the Proposed Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2023, I caused the foregoing to be filed electronically with the Clerk of the Court using the ECF system, which will send notification of such filing to all parties.

Respectfully submitted,

November 2, 2023 Lafayette Hill, Pennsylvania <u>/s/ Lee Albert</u> Lee Albert