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7 *Public School Retirement System of the*
8 *School District of Kansas City,*
9 *Missouri and Liaison Counsel*
10 *for the Proposed Class*

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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 VANCOUVER ALUMNI ASSET
14 HOLDINGS INC., Individually and on
Behalf of All Others Similarly Situated,

15 Plaintiffs,

16 v.

17 DAIMLER AG, DIETER ZETSCHE,
18 BODO UEPPER, and THOMAS
WEBER,

19 Defendants.

20 MARIA MUNRO, Individually and on
Behalf of All Others Similarly Situated,

21 Plaintiffs,

22 v.

23 DAIMLER AG, DIETER ZETSCHE,
24 BODO UEPPER, and THOMAS
WEBER,

25 Defendants.

Master File No. 16-cv-02942-DSF-KS

Judge: Hon. Dale S. Fischer

**LEAD COUNSEL'S NOTICE OF
MOTION AND MOTION FOR
AWARD OF ATTORNEYS' FEES
AND PAYMENT OF EXPENSES**

Case No. 16-cv-03412-DSF-KS

Hearing:

Date: December 14, 2020

Time: 1:30 p.m.

Place: Courtroom 7D

Judge: Hon. Dale S. Fischer

1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on December 14, 2020, at 1:30 p.m., Lead
3 Counsel Labaton Sucharow LLP, on behalf of Plaintiffs' Counsel, will move this
4 Court for an Order, pursuant to Rules 23(h) and 54 of the Federal Rules of Civil
5 Procedure, approving Lead Counsel's application for an award of attorneys' fees
6 and payment of expenses, including an award to Lead Plaintiff pursuant to the
7 Private Securities Litigation Reform Act of 1995.

8 Defendants do not oppose the granting of final approval of the Settlement
9 consistent with the Motion, and take no position on Lead Counsel's requests for
10 attorneys' fees, expenses, and an award to Lead Plaintiff.

11 This Motion is supported by the accompanying Memorandum of Points and
12 Authorities in Support of Lead Counsel's Motion for an Award of Attorneys' Fees
13 and Payment of Expenses and the accompanying Declaration of James W.
14 Johnson in Support of (I) Lead Plaintiff's Motion for Final Approval of Class
15 Action Settlement and Plan of Allocation and (II) Lead Counsel's Motion for an
16 Award of Attorneys' Fees and Payment of Expenses, dated November 9, 2020,
17 and the exhibits attached thereto (filed concurrently herewith); the pleadings and
18 other documents on file in this action; and all other written material or oral
19 argument as may be presented to the Court.

20 Although proposed orders are being submitted herewith pursuant to Local
21 Civil Rule 7-20, updated orders may be submitted with Lead Plaintiff's reply
22 submission on or before December 7, 2020, after the deadline for objecting has
23 passed.

24 **CIVIL LOCAL RULE 7-3**

25 This motion is being filed pursuant to paragraph 20 of the Court's Order
26 Granting Preliminary Approval of Class Action Settlement, Approving Form and
27 Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement
28 (ECF No. 325).

1 This motion is made following a conference of counsel pursuant to Local
2 Rule 7-3 in which counsel for Defendants indicated that they do not oppose the
3 granting of final approval of the Settlement consistent with the Motion, and take
4 no position on Lead Counsel’s requests for attorneys’ fees, expenses, and an
5 award to Lead Plaintiff.

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Dated: November 9, 2020

LABATON SUCHAROW LLP

By: /s/ James W. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List served via ECF on all registered participants only.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 9, 2020

/s/ James W. Johnson
James W. Johnson

1 **Mailing Information for a Case 2:16-cv-02942-DSF-KS Vancouver Alumni**
2 **Asset Holdings, Inc. v. Daimler AG et al**

3 **Electronic Mail Notice List**

4 The following are those who are currently on the list to receive e-mail notices for this case.

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26 CASE NO. 16-CV-02942-DSF-KS AND 16-CV-03412-DSF-KS

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