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

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*for the Proposed Class*

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

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

15 Plaintiffs,

16 v.

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

19 Defendants.

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

21 Plaintiffs,

22 v.

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

25 Defendants.

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

Judge: Hon. Dale S. Fischer

**LEAD PLAINTIFF'S NOTICE OF  
MOTION AND MOTION FOR FINAL  
APPROVAL OF PROPOSED CLASS  
ACTION SETTLEMENT AND PLAN  
OF ALLOCATION**

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 Plaintiff the Public School Retirement System of the School District of Kansas  
4 City, Missouri (“Lead Plaintiff”), through its counsel Labaton Sucharow LLP, on  
5 behalf of itself and all members of the proposed Settlement Class, will move this  
6 Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and  
7 (e): (i) granting final approval to the proposed settlement of the above-captioned  
8 class action (the “Settlement”); (ii) certifying the Settlement Class pursuant to  
9 Rules 23(a) and (b)(3), and appointing Lead Plaintiff as Class Representative and  
10 the law firm of Labaton Sucharow LLP as Class Counsel for the Settlement Class;  
11 and (iii) approving the proposed Plan of Allocation for the proceeds of the  
12 settlement. Defendants do not oppose the granting of final approval of the  
13 Settlement consistent with the Motion, and take no position on Lead Counsel’s  
14 requests for attorneys’ fees, expenses, and an award to Lead Plaintiff.

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

24 Although proposed orders are being submitted herewith pursuant to Local  
25 Civil Rule 7-20, updated orders may be submitted with Lead Plaintiff’s reply  
26 submission on or before December 7, 2020, after the deadlines for seeking  
27 exclusion and objecting have passed.

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**CIVIL LOCAL RULE 7-3**

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

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

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  
Asset Holdings, Inc. v. Daimler AG et al**

2 **Electronic Mail Notice List**

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

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