UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CITY OF STERLING HEIGHTS POLICE &	x
FIRE RETIREMENT SYSTEM, Individually	Civil Action No. 1:20-cv-10041-PKC
and on Behalf of All Others Similarly Situated,	<u>CLASS ACTION</u>
Plaintiff,	LEAD COUNSEL'S NOTICE OF MOTION
vs.	AND MOTION FOR AN AWARD OF
RECKITT BENCKISER GROUP PLC,	ATTORNEYS' FEES AND EXPENSES AND
RAKESH KAPOOR, and SHAUN	AN AWARD TO LEAD PLAINTIFF
THAXTER,	PURSUANT TO 15 U.S.C. §78u-4(a)(4)
Defendants.	: : x

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Counsel will move this Court on July 19, 2023, at 2:00 p.m., before the Honorable P. Kevin Castel at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, or as soon thereafter as the parties can be heard, for an entry of order, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) awarding attorneys' fees; (ii) paying litigation expenses incurred in prosecuting the Action; and (iii) granting an award to Lead Plaintiff.¹

This motion is based on: (i) the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (ii) the Declaration of Alan I. Ellman in Support of: (1) Plaintiffs' Motion for Final

¹ Unless stated otherwise, all capitalized terms used herein have the meanings set forth and defined in the Stipulation of Settlement (ECF 162).

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Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Lead Plaintiff; (iv) the Declaration of Ross D. Murray; (v) the Declaration of Lead Counsel; (vi) the Stipulation of Settlement; and (vii) all other proceedings herein.

A proposed order will be submitted with Plaintiffs' reply submission on or before July 10, 2023.

DATED: June 14, 2023

Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP SAMUEL H. RUDMAN MARIO ALBA JR. ALAN I. ELLMAN CHRISTOPHER T. GILROY

> *s/ Alan I. Ellman* ALAN I. ELLMAN

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Lead Counsel for Plaintiffs

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Additional Counsel

CERTIFICATE OF SERVICE

I, ALAN I. ELLMAN, hereby certify that on June 14, 2023, 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 all counsel registered to receive such notice.

s/ Alan I. Ellman ALAN I. ELLMAN