

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF STERLING HEIGHTS POLICE & FIRE RETIREMENT SYSTEM, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 1:20-cv-10041-PKC
	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	PLAINTIFFS’ NOTICE OF MOTION AND
	:	MOTION FOR FINAL APPROVAL OF
vs.	:	CLASS ACTION SETTLEMENT AND
	:	APPROVAL OF PLAN OF ALLOCATION
RECKITT BENCKISER GROUP PLC, RAKESH KAPOOR, and SHAUN THAXTER,	:	
	:	
Defendants.	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff City of Birmingham Retirement and Relief System and Plaintiff City of Sterling Heights Police & Fire Retirement System (collectively, “Plaintiffs”), on behalf of the Class, by their undersigned 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 the entry of orders and a judgment, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) for the purposes of settlement only, certifying the Class, certifying Plaintiffs as Class Representatives and appointing Lead Counsel as Class Counsel; (ii) granting final approval of the proposed Settlement between Plaintiffs and Defendants Reckitt Benckiser Group plc, Rakesh Kapoor and Shaun Thaxter, as set forth in the Stipulation of Settlement, previously filed with the

Court (ECF 162); (iii) approving the proposed Plan of Allocation; and (iv) for such further relief as is just.¹

In support of this motion, Plaintiffs rely on: (i) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; (ii) the Declaration of Alan I. Ellman in Support of: (1) Plaintiffs' Motion for Final 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 Stipulation of Settlement; and (vi) all other proceedings herein.

Proposed orders 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

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

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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