

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

IN RE SPECTRUM BRANDS SECURITIES LITIGATION)
)
) No. 19-cv-347-jdp
)
)

**LEAD PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

Lead Plaintiffs, the Public School Teachers' Pension and Retirement Fund of Chicago and the Cambridge Retirement System (collectively, "Lead Plaintiffs"), in accordance with Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated September 28, 2020 (Dkt. 48), will and does hereby move this Court, before the Honorable James D. Peterson, on January 29, 2021 at 3:00 p.m. Central time, for entry of a Judgment approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. This motion is based on (i) the Declaration of Katherine M. Sinderson in Support of (I) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; (ii) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (iii) all other papers and proceedings herein. A proposed Judgment and an Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: December 24, 2020

Respectfully submitted,

/s/ Katherine M. Sinderson

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