

**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 November 17, 2021 (dkt. 98), will and does hereby move this Court, before the Honorable James D. Peterson, on March 18, 2022 at 10:00 a.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 Spectrum Class have passed.

Dated: February 7, 2022

Respectfully submitted,

/s/ Katherine M. Sinderson

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Katherine M. Sinderson, admitted *pro hac vice*

Jai Chandrasekhar, admitted *pro hac vice*

Matthew Traylor, admitted *pro hac vice*

1251 Avenue of the Americas

New York, NY 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

KatieM@blbglaw.com

Jai@blbglaw.com

Matthew.Traylor@blbglaw.com

-and-

Avi Josefson

875 North Michigan Avenue, Suite 3100

Chicago, Illinois 60611

Telephone: (312) 373-3880

Facsimile: (312) 794-7801

avi@blbglaw.com

*Lead Counsel for Lead Plaintiffs the Public
School Teachers' Pension & Retirement Fund of
Chicago and the Cambridge Retirement System
and the Spectrum Class*

STAFFORD ROSENBAUM LLP

Douglas M. Poland

State Bar No. 1055189

222 West Washington Avenue, Suite 900

P.O. Box 1784

Madison, WI 53701-1784

Telephone: (608) 256-0226

Facsimile: (608) 259-2600

dpoland@staffordlaw.com

*Liaison Counsel for Lead Plaintiffs the Public
School Teachers' Pension & Retirement Fund of
Chicago and the Cambridge Retirement System
and the Spectrum Class*

CERTIFICATE OF SERVICE

I, Katherine M. Sinderson, an attorney, hereby certify that a copy of the foregoing “**Lead Plaintiffs’ Motion for Final Approval of Settlement and Plan of Allocation**” was served on counsel for all parties electronically via the CM/ECF system on February 7, 2022.

Dated: February 7, 2022

By: /s/ Katherine M. Sinderson
Katherine M. Sinderson