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

IN RE SPECTRUM BRANDS SECURITIES LITIGATION

No. 19-cv-347-jdp

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LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES

Lead Counsel, in accordance with Federal Rules of Civil Procedure 23(e) and 23(h) 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 an Order awarding attorneys' fees and litigation expenses. 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 Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; and (iii) all other papers and proceedings herein. A proposed Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers after the deadline for objecting to the motion has passed.

Dated: December 24, 2020

Respectfully submitted,

<u>/s/ Katherine M. Sinderson</u> 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

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