

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TIMOTHY D. LAURENT, *et al.*,

**On behalf of themselves and all
others similarly situated,**

Plaintiffs,

V.

PRICEWATERHOUSECOOPERS LLP, et al.,

Defendants.

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**PLAINTIFFS' NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, the undersigned will move before the Honorable J. Paul Oetken of the United States District Court for the Southern District of New York, at the United States District Courthouse, 40 Foley Square, New York, NY 10007, at a time and place to be scheduled by this Court, for an order in accordance with Fed. R. Civ. P. 23(e), that would

(1) Grant preliminary approval of the parties' September 15, 2022 Class Action Agreement (attached hereto as Exhibit 1), under which all of Plaintiffs' and the approximately 16,000 member Class's claims in this case will be dismissed in exchange for a Total Settlement Amount of \$267 million, because the proposed resolution was the product of arm's-length negotiations, is fair, reasonable, and adequate, and is likely to receive final approval by this Court;

(2) Grant approval of the proposed notice to be mailed and the proposed notice for publication to the Class, in terms of both their content and their manner of dissemination;

(3) Set a date for a fairness hearing and deadlines for the interim steps of mailing and publication of the notices, the filing of Class member objections, Plaintiffs' motion for final approval, and Class counsel's application for attorney's fees and expenses and named plaintiff incentive awards.

Defense counsel have authorized undersigned counsel to represent that Defendants concur in the relief requested in this motion.

A proposed preliminary approval order is attached hereto as Exhibit 2.

CONCLUSION

WHEREFORE, for the reasons stated herein, and for such other reasons as may appear to the Court, Plaintiffs respectfully request that the Court grant preliminary approval to the proposed settlement and enter the parties' proposed Preliminary Approval Order.

Dated: September 19, 2022

Respectfully submitted,

/s/Eli Gottesdiener
Eli Gottesdiener
Albert Huang
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