

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UA LOCAL 13 & EMPLOYERS GROUP	:	Civil Action No. 1:19-cv-10161-LLS-RWL
INSURANCE FUND, Individually and on	:	
Behalf of All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	NOTICE OF PLAINTIFFS’ MOTION FOR
	:	(1) FINAL APPROVAL OF CLASS ACTION
vs.	:	SETTLEMENT, (2) APPROVAL OF PLAN
	:	OF ALLOCATION, AND (3) LEAD
SEALED AIR CORPORATION and	:	COUNSEL’S APPLICATION FOR AN
WILLIAM G. STIEHL,	:	AWARD OF ATTORNEYS’ FEES AND
	:	EXPENSES AND AWARDS TO
Defendants.	:	PLAINTIFFS PURSUANT TO 15 U.S.C.
	:	§78u-4(a)(4)
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that upon: (i) the Declaration of Robert M. Rothman; (ii) the Declaration of Steven Ostrander; (iii) the Declaration of Ryan Heimroth; (iv) the Declaration of Michael Nanno; (v) the Stipulation and Agreement of Settlement, dated September 9, 2022, and the Exhibits annexed thereto; (vi) the Declaration of Ross D. Murray; (vii) the Memorandum of Law in Support of Plaintiffs’ Motion for (1) Final Approval of Class Action Settlement, (2) Approval of Plan of Allocation, and (3) Lead Counsel’s Application for an Award of Attorneys’ Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4); and (viii) all other proceedings herein, Plaintiffs UA Local 13 Pension Fund, UA Local 13 & Employers Group Insurance Fund, Plumbers & Steamfitters Local 267 Pension Fund, and Plumbers and Steamfitters Local No. 7 Pension and Welfare Funds (“Plaintiffs”) through counsel, will respectfully move this Court, before the Honorable Louis L. Stanton, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York on January 20, 2023, at 2:00 p.m., for entry of orders and judgments pursuant to

Rule 23 of the Federal Rules of Civil Procedure: (1) finally approving the settlement of the captioned litigation; (2) approving the Plan of Allocation; (3) awarding Lead Counsel attorneys' fees and expenses in the litigation; and (4) awarding Plaintiffs compensation for their time and service representing the Class.

Proposed orders will be submitted with Plaintiffs' reply submission on or before January 13, 2023.

DATED: December 16, 2022

Respectfully submitted,

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& DOWD LLP
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/s/ Robert M. Rothman

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Additional Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on December 16, 2022, 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/ Robert M. Rothman

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