

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE AEGEAN MARINE
PETROLEUM NETWORK, INC.
SECURITIES LITIGATION

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) Case No. 1:18-cv-04993 (NRB)
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) Hon. Naomi Reice Buchwald
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**NOTICE OF LEAD COUNSEL’S MOTION FOR
ATTORNEYS’ FEES AND REIMBURSEMENT OF LITIGATION EXPENSES AND
THE ESTABLISHMENT OF A LITIGATION EXPENSE FUND**

PLEASE TAKE NOTICE that Lead Counsel¹ hereby moves this Court before the Honorable Naomi Reice Buchwald, for an order approving their application (1) for an aggregate award of attorneys’ fees of \$7,450,000 or 25% of the \$29.8 million Gross Settlement Funds,² plus interest, and reimbursement of Litigation Expenses³ of \$350,318.76 to be paid out of the PwC Greece Settlement Fund and/or the Deloitte Greece Settlement Fund; and (2) for reimbursement of certain of Lead Plaintiffs’ reasonable costs and expenses in the amounts of \$10,000, pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4).

PLEASE TAKE FURTHER NOTICE that in support of the motion, Lead Counsel submits and is filing herewith:

- (A) Memorandum of Law in Support of Lead Counsel’s Motion For Attorneys’ Fees and Reimbursement of Litigation Expenses and The Establishment of a Litigation Expense Fund;

¹ All capitalized terms not otherwise defined herein have the same meaning as in the Notice of (I) Pendency of Class Action and Proposed Partial Settlements; and (II) Final Approval Hearing For The Partial Settlements, Plans of Allocation, Motion For Approval of Attorneys’ Fees and Reimbursement of Litigation Expenses and Application For The Establishment of a Litigation Expense Fund (the “Omnibus Notice”) (ECF No. 359-1).

² The “Gross Settlement Funds” refers to \$29.8 million settlements, including the \$14.9 million settlement with PricewaterhouseCoopers Auditing Company S.A. (“PwC Greece”) (the “PwC Greece Settlement” or “PwC Greece Settlement Fund”) and the \$14.9 million settlement with Deloitte Certified Public Accountants, S.A. (“Deloitte Greece”) (the “Deloitte Greece Settlement” or “Deloitte Greece Settlement Fund”).

- (B) Declaration of Nicole Lavallee in Support of (A) Lead Plaintiff's Motion For: (I) Final Approval of The Proposed Partial Class Action Settlements With PricewaterhouseCoopers Auditing Company S.A. and Deloitte Certified Public Accountants, S.A.; (II) Final Certification of The Settlement Class; and (III) Final Approval of The Proposed Plans of Allocation; and (B) Lead Counsel's Motion For Attorneys' Fees and Reimbursement of Litigation Expenses and The Establishment of a Litigation Expense Fund ; and
- (C) [Proposed] Order Awarding Attorneys' Fees and Reimbursement of Litigation Expenses and The Establishment of a Litigation Expense Fund.

Dated: August 9, 2022

Respectfully submitted,

BERMAN TABACCO

By: /s/ Nicole Lavallee
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