

- (d) appointment of Lead Plaintiff as Class Representative and Lead Counsel as Class Counsel for purposes of the Individual Defendants Settlements only;
- (e) approval of the selection of A.B. Data, Ltd. by Lead Counsel as the Claims Administrator;
- (f) scheduling the Final Approval Hearing for the Individual Defendants Settlements; and
- (g) the granting of such other and further relief as the Court deems just and proper (the “Motion”).

The proposed Individual Defendants Settlements would resolve and release the claims against Gianniotis, Melissanidis, and other released parties defined in the Individual Defendants Stipulations.

Gianniotis and Melissanidis support the relief requested and will not oppose this motion.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Lead Plaintiff submits herewith: (1) Memorandum of Law in Support of Lead Plaintiff’s Motion; and (2) the Declaration of Nicole Lavallee in support thereof with exhibits thereto.

Dated: April 21, 2023

Respectfully submitted,

BERMAN TABACCO

By: /s/ Nicole Lavallee
Nicole Lavallee (admitted *pro hac vice*)

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