

FILED
07-16-2020
CIRCUIT COURT
DANE COUNTY, WI
2019CV000982

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH 3

DANE COUNTY

PLYMOUTH COUNTY RETIREMENT
ASSOCIATION, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

SPECTRUM BRANDS HOLDINGS, INC.,
DAVID M. MAURA, JOSEPH S.
STEINBERG, GEORGE C. NICHOLSON,
CURTIS GLOVIER, FRANK IANNA,
GERALD LUTERMAN, ANDREW A.
MCKNIGHT, ANDREW WHITTAKER and
HRG GROUP, INC.,

Defendants.

Case No. 2019-CV-000982
Case Code: 30301 (Money Judgment)

Hon. Valerie L. Bailey-Rihn

**LEAD COUNSEL’S NOTICE OF MOTION AND MOTION FOR
AN AWARD OF ATTORNEYS’ FEES AND PAYMENT OF EXPENSES**

PLEASE TAKE NOTICE that pursuant to Wis. Stat. §803.08, Lead Counsel Labaton Sucharow LLP, on behalf of Plaintiff’s Counsel, will move this Court on August 20, 2020, at 10:00 a.m., before the Hon. Valerie L. Bailey-Rihn, for an Order awarding:

- (a) attorneys’ fees in the amount of 30% of the Settlement Fund, including accrued interest;
- (b) litigation expenses incurred by Plaintiff’s Counsel in the amount of \$46,081.53, plus accrued interest; and
- (c) \$3,200 to Plaintiff Plymouth County Retirement Association for its efforts on behalf of the proposed Settlement Class.

This motion is based upon the accompanying supporting memorandum of law and the accompanying Declaration of Jonathan Gardner in Support of (I) Plaintiff’s Motion for Final Approval

of Class Action Settlement and Plan of Allocation and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses, with exhibits.

A proposed order will be submitted with Lead Counsel's reply papers, after the deadline for objecting has passed.

Dated: July 16, 2020

Respectfully submitted,

LABATON SUCHAROW LLP

By: *Electronically signed by Jonathan Gardner*

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