

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

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**PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AND PLAN OF ALLOCATION**

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PLEASE TAKE NOTICE that pursuant to Wis. Stat. §803.08, Plaintiff Plymouth County Retirement Association, individually and on behalf of the proposed Settlement Class, by its undersigned attorneys, will move this Court on August 20, 2020, at 10:00 a.m., before the Hon. Valerie L. Bailey-Rihn, for an Order, *inter alia*:

- (a) granting final approval to the proposed \$9 million Settlement of this class action;
- (b) certifying a class for Settlement purposes, appointing Lead Counsel as Class Counsel, and appointing Plaintiff as Class Representative; and
- (c) approving the proposed Plan of Allocation for distribution of the Net Settlement Fund to Authorized Claimants.

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.

Proposed orders will be submitted with Plaintiff's reply papers, after the deadlines for seeking exclusion or objecting have passed.

Dated: July 16, 2020

Respectfully submitted,

LABATON SUCHAROW LLP

By: *Electronically signed by Jonathan Gardner*

Jonathan Gardner (pro hac vice)  
David J. Goldsmith  
Alfred L. Fatale III (pro hac vice)  
Marco A. Duenas (pro hac vice)  
140 Broadway  
New York, NY 10005  
Tel.: (212) 907-0700  
Fax: (212) 818-0477  
jgardner@labaton.com  
dgoldsmith@labaton.com  
afatale@labaton.com  
mduenas@labaton.com

*Lead Counsel for Plaintiff Plymouth  
County Retirement Association and the  
Proposed Settlement Class*

THORNTON LAW FIRM LLP  
Guillaume Buell  
One Lincoln Street  
Boston, MA 02111  
(617) 720-1333  
gbuell@tenlaw.com

*Attorneys for Plaintiff Plymouth  
County Retirement Association*

MICHAEL BEST & FRIEDRICH LLP

By: *Electronically signed by John C. Scheller*

John C. Scheller, SBN 1031247

One South Pinckney Street, Suite 700

P.O. Box 1806

Madison, WI 53701-1806

Tel.: (608) 257-3501

Fax: (608) 283-2275

jcscheller@michaelbest.com

*Liaison Counsel for Plaintiff*

*Plymouth County Retirement Association*