

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JACKSON COUNTY EMPLOYEES’ RETIREMENT SYSTEM, Individually and on Behalf of All Others Similarly Situated,	)	Civil Action No. 3:18-cv-01368
	)	<u>CLASS ACTION</u>
	)	
Plaintiff,	)	Hon. William L. Campbell, Jr.
	)	Magistrate Judge Alistair Newbern
vs.	)	
	)	NOTICE OF MOTION AND MOTION FOR
CARLOS GHOSN, et al.,	)	(1) FINAL APPROVAL OF CLASS ACTION
	)	SETTLEMENT AND APPROVAL OF PLAN
Defendants.	)	OF ALLOCATION; AND (2) AN AWARD
	)	OF ATTORNEYS’ FEES AND EXPENSES
_____	)	

TO: ALL PARTIES AND THEIR COUNSEL ON RECORD

PLEASE TAKE NOTICE that, pursuant to an Order of the Court entered May 26, 2022, on September 19, 2022, at 2:30 p.m., or as soon thereafter as counsel may be heard, at the Fred D. Thompson United States Courthouse, 719 Church Street, Nashville, Tennessee, before the Honorable William L. Campbell, Jr., Plaintiffs will and hereby move for (i) final approval of the proposed settlement of the above-captioned action; and (ii) approval of the Plan of Allocation. In addition, Lead Counsel hereby apply for an award of attorneys’ fees and expenses.

The foregoing motions are based on the:

- Memorandum of Law in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation;
- Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses;
- Declaration of Christopher M. Wood in Support of: (1) Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) an Award of Attorneys’ Fees and Expenses;

- Declaration of Jackson County Employees' Retirement System Trustee James Shotwell;
- Declaration of Jeffrey Dana on Behalf of the City of Providence Employees' Retirement System;
- Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date;
- Declaration of Christopher M. Wood Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Stipulation of Settlement and all Exhibits thereto, all other pleadings and matters of record, and such additional evidence or argument as may be presented at the hearing.

DATED: August 15, 2022

Respectfully submitted,

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& DOWD LLP  
JERRY E. MARTIN, #20193  
CHRISTOPHER M. WOOD, #032977  
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s/Christopher M. Wood  
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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that on August 15, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood  
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# Mailing Information for a Case 3:18-cv-01368 Jackson County Employees' Retirement System v. Ghosn et al

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### **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

**Hiroshi Karube**

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