

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN
JEFFREY W. HERRMANN
Park 80 West – Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel for Plaintiff

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

CITY OF STERLING HEIGHTS)	No. 2:12-cv-05275-MCA-LDW
GENERAL EMPLOYEES’)	
RETIREMENT SYSTEM, Individually)	<u>CLASS ACTION</u>
and on Behalf of All Others Similarly)	
Situated,)	NOTICE OF MOTION AND MOTION
)	FOR FINAL APPROVAL OF CLASS
Plaintiff,)	ACTION SETTLEMENT AND PLAN
)	OF ALLOCATION OF SETTLEMENT
vs.)	PROCEEDS AND AN AWARD OF
)	ATTORNEYS’ FEES AND
PRUDENTIAL FINANCIAL, INC., et)	EXPENSES AND PLAINTIFFS’
al.,)	EXPENSES
)	
Defendants.)	

PLEASE TAKE NOTICE that on September 28, 2016 or such other date as the Court may set, the undersigned, counsel for Plaintiffs, shall move before the Honorable Madeline Cox Arleo for an order pursuant to the Court's Order Preliminarily Approving Settlement and Providing for Notice entered on June 20, 2016 (Dkt. No. 431) for the entry of a Final Judgment and Order of Dismissal with Prejudice approving the settlement and plan of allocation of settlement proceeds and entering an award of attorneys' fees, costs, charges and expenses.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs will rely upon: Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation of Settlement Proceeds; Memorandum of Law in Support of Plaintiffs' Counsel's Motion for an Award of Attorneys' Fees and Expenses and Plaintiffs' Expenses; Declaration of Carole K. Sylvester Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date; Declaration of Shawn A. Williams in Support of (1) Final Approval of Class Action Settlement; (2) Plan of Allocation of Settlement Proceeds; and (3) an Award of Attorneys' Fees and Expenses; Declaration of Timothy O'Connell in Support of Application for Final Approval of Class Action Settlement and Award of Attorneys' Fees and Expenses; Declaration of Charles B. O'Neill in Support of Application for Final Approval of Class Action Settlement and Award of Attorneys' Fees and Expenses; Declaration of Darris Garoufalis in Support of Application for Final Approval of Class Action Settlement and Award of Attorneys' Fees and Expenses; Declaration of Shawn A. Williams Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys'

Fees and Expenses; Declaration of Peter S. Pearlman, Esq. Filed on Behalf of Cohn Lifland Pearlman Herrmann & Knopf LLP in Support of Application for Award of Attorneys' Fees and Expenses.

Plaintiffs seek oral argument on this application

DATED: August 24, 2016

Respectfully submitted,

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN
JEFFREY W. HERRMANN

s/ Peter S. Pearlman
PETER S. PEARLMAN

Park 80 West – Plaza One
250 Pehle Avenue, Suite 401
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel for Plaintiff

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS
AELISH M. BAIG
ARMEN ZOHRABIAN
DAVID W. HALL
SUNNY S. SARKIS
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiff

SULLIVAN, WARD, ASHER &
PATTON, P.C.
MICHAEL J. ASHER
1000 Maccabees Center
25800 Northwestern Highway
Southfield, MI 48075-1000
Telephone: 248/746-0700
248/746-2760 (fax)

THOMAS J. HART
SLEVIN & HART, P.C.
1625 Massachusetts Avenue, NW,
Suite 450
Washington, DC 20036
Telephone: 202/797-8700
202/234-8231 (fax)

ANDREW F. ZAZZALI, JR.
ZAZZALI, FAGELLA, NOWAK,
KLEINBAUM & FRIEDMAN
One Riverfront Plaza, Suite 320
1037 Raymond Boulevard
Newark, NJ 07102
Telephone: 973/623-1822
973/623-2209 (fax)

Additional Counsel for Plaintiff