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14 **UNITED STATES DISTRICT COURT**
 15 **CENTRAL DISTRICT OF CALIFORNIA**

16 IN RE STABLE ROAD
 17 ACQUISITION CORP. SECURITIES
 18 LITIGATION

Case No. 2:21-CV-5744-JFW(SHKx)

Honorable John F. Walter

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

Hearing Date: April 22, 2024

Hearing Time: 1:30 p.m.

Location: W. 1st Street, Courtroom 7A

1 **TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD:**

3 PLEASE TAKE NOTICE that, pursuant to ECF No. 195, on April 22, 2024 at
4 1:30 p.m., or as soon thereafter as the Parties¹ may be heard in the courtroom of the
5 Honorable John F. Walter, courtroom 7A, located at the United States Courthouse,
6 350 W. 1st Street, Los Angeles, CA 90012, Court-appointed lead plaintiff Hartmut
7 Haenisch (“Lead Plaintiff”) will, and hereby does, move the Court for entry of an
8 Order: (i) granting final approval of the Settlement in the above-captioned action on
9 the terms set forth in the Stipulation; and (ii) approving the proposed Plan of
10 Allocation for distribution of the Net Settlement Fund.

11 Lead Plaintiff’s motion is based upon the accompanying Memorandum of
12 Points and Authorities, the Declaration of Casey E. Sadler in Support of: (I) Lead
13 Plaintiff’s Motion for Final Approval of Class Action Settlement and Plan of
14 Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and
15 Reimbursement of Litigation Expenses, and all exhibits thereto; all pleadings and
16 records on file in this Action; and other such matters as the Court may consider.

17 Lead Counsel conferred with Defendants’ counsel with respect to this motion.
18 Defendants’ counsel has authorized Lead Counsel to represent that: “Defendants do
19 not oppose Plaintiffs’ motion for settlement approval other than that the judgment
20 should include a contribution bar pursuant to the Private Securities Litigation Reform
21 Act (‘PSLRA’) which provides that ‘[u]pon entry of the settlement by the court, the
22 court shall enter a bar order constituting the final discharge of all obligations to the
23 plaintiff of the settling covered person arising out of the action.’ 15 U.S. Code § 78u–
24 4(7).” There has, however, been an objection filed with respect to this motion. *See*

25
26 _____
27 ¹ Unless otherwise defined, all capitalized terms used herein have the meanings
28 ascribed to them in the Stipulation and Agreement of Settlement, dated August 18,
2023 (“Stipulation”). *See* ECF No. 178-1.

1 ECF No. 196.²

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3 Dated: March 18, 2024

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GLANCY PRONGAY & MURRAY LLP

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By: s/ Casey E. Sadler

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Additional Counsel

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² Lead Plaintiff will respond to the objection, along with any others that may be received, in his reply papers, which are due fourteen (14) days after the April 1, 2024, objection and exclusion deadline.

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PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned, say:

I am not a party to the above case, and I am over eighteen years old. On March 18, 2024, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court’s Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 18, 2024, at Los Angeles, California.

/s/ Casey E. Sadler
Casey E. Sadler