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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

IN RE STABLE ROAD
ACQUISITION CORP.
SECURITIES LITIGATION

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

Honorable John F. Walter

**[PROPOSED] ORDER APPROVING
PLAN OF ALLOCATION OF NET SETTLEMENT FUND**

1 This matter came on for hearing on April 22, 2024 (the “Settlement Hearing”)
2 on Lead Plaintiff’s motion to determine whether the proposed plan of allocation of
3 the Net Settlement Fund (“Plan of Allocation”) created by the Settlement achieved in
4 the above-captioned class action (the “Action”) should be approved. The Court
5 having considered all matters submitted to it at the Settlement Hearing and otherwise;
6 and it appearing that notice of the Settlement Hearing substantially in the form
7 approved by the Court was mailed or emailed to all Settlement Class Members who
8 or which could be identified with reasonable effort, and that a summary notice of the
9 hearing substantially in the form approved by the Court was published in *Investor’s*
10 *Business Daily* and was transmitted over the *PR Newswire* pursuant to the
11 specifications of the Court; and the Court having considered and determined the
12 fairness and reasonableness of the proposed Plan of Allocation,

13 NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

14 1. This Order approving the proposed Plan of Allocation incorporates by
15 reference the definitions in the Stipulation and Agreement of Settlement dated August
16 18, 2023 (ECF No. 178-1) (the “Stipulation”) and all capitalized terms not otherwise
17 defined herein shall have the same meanings as set forth in the Stipulation.

18 2. The Court has jurisdiction to enter this Order approving the proposed
19 Plan of Allocation, and over the subject matter of the Action and all parties to the
20 Action, including all Settlement Class Members.

21 3. Notice of Lead Plaintiff’s motion for approval of the proposed Plan of
22 Allocation was given to all Settlement Class Members who could be identified with
23 reasonable effort. The form and method of notifying the Settlement Class of the
24 motion for approval of the proposed Plan of Allocation satisfied the requirements of
25 Rule 23 of the Federal Rules of Civil Procedure, the Private Securities Litigation
26 Reform Act of 1995 (15 U.S.C. § 78u-4(a)(7)), due process, and all other applicable
27 law and rules, constituted the best notice practicable under the circumstances, and
28 constituted due and sufficient notice to all persons and entities entitled thereto.

1 4. The Notice, which included the Plan of Allocation, was contained in the
2 Notice mailed or emailed to potential Settlement Class Members and posted on the
3 settlement website, www.StableRoadSecuritiesSettlement.com, and no objections to
4 the proposed plan were submitted.

5 5. The Court hereby finds and concludes that the formula for the calculation
6 of the claims of Claimants as set forth in the Plan of Allocation provides a fair and
7 reasonable basis upon which to allocate the proceeds of the Net Settlement Fund
8 among Settlement Class Members with due consideration having been given to
9 administrative convenience and necessity.

10 6. The Court hereby finds and concludes that the Plan of Allocation is, in
11 all respects, fair and reasonable to the Settlement Class.

12 7. There is no just reason for delay in the entry of this Order, and immediate
13 entry by the Clerk of the Court is expressly directed.

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15 SO ORDERED this _____ day of _____, 2024.

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The Honorable John F. Walter
United States District Judge

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