



Lieff Cabraser Heimann & Bernstein, LLP (“Lieff Cabraser” or the “Firm”) respectfully moves for a partial stay of execution on the Final Judgment Concerning Attorneys’ Fees and Service Awards entered by the Court on January 19, 2021 (the “Final Judgment,” ECF No. 663) and the accompanying Memorandum and Order and Second Revised Payment Plan (the “Second Revised Plan”) entered on the same date (ECF Nos. 662 and 662-1) (collectively, the “Fee Order”), pending Lieff Cabraser’s appeal of the Fee Order to the United States Court of Appeals for the First Circuit.

As grounds for this motion, Lieff Cabraser relies on the accompanying supporting Memorandum, the colloquy before the Court during the September 22, 2020 hearing (ECF No. 642), the Response by Lieff Cabraser Heimann & Bernstein, LLP to the Court’s September 29, 2020 Order (ECF No. 648), and all other prior papers and proceedings in this Action.

WHEREFORE, and for the reasons discussed more fully in the accompanying Memorandum, Lieff Cabraser respectfully seeks the relief requested.

Dated: January 27, 2021

Respectfully submitted,

Lieff Cabraser Heimann & Bernstein, LLP

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**Certificate Of Compliance with Local Rule 7.1(a)(2)**

I certify that pursuant to Local Rule 7.1(a)(2), my firm conferred with counsel for the other parties and non-parties prior to filing the instant motion. Labaton Sucharow LLP and the Thornton Law Firm LLP assent to the motion. State Street takes no position. Keller Rohrback, LLP and Zuckerman Spaeder LLP neither assent nor oppose but reserve all rights in responding to the motion. The Special Master, HLLI, and McTigue Law LLP oppose.

*/s/ Richard M. Heimann*

Richard M. Heimann

**Certificate of Service**

I certify that on January 27, 2020, I caused the foregoing Motion to be filed through the ECF system in above-captioned action No. 11-cv-10230, and accordingly to be served electronically upon all registered participants identified on the Notices of Electronic Filing.

/s/ Richard M. Heimann  
Richard M. Heimann