## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

GLENN FREEDMAN, individually and on behalf of all similarly situated,

Civil Action No. 12-CV-2121 (LAK)

Plaintiff,

V.

WEATHERFORD INTERNATIONAL, LTD., et al.,

Defendants.

# NOTICE OF CLASS REPRESENTATIVES' MOTION FOR APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION

#### BLEICHMAR FONTI TOUNTAS & AULD LLP

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Class Counsel and Counsel for Court-Appointed Co-Lead Plaintiff and Class Representative Sacramento City Employees' Retirement System PLEASE TAKE NOTICE that Class Representatives, Anchorage Police & Fire Retirement System and Sacramento City Employees' Retirement System ("Class Representatives"), on behalf of themselves and the Class, through counsel, will move this Court on November 3, 2015, before the Honorable Lewis A. Kaplan for orders, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) granting approval of the proposed Settlement; and (2) approving the proposed Plan of Allocation.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Class Representatives submit and are filing herewith the: (1) Memorandum of Law in Support of Class Representatives' Motion for Approval of Proposed Class Action Settlement and Plan of Allocation, dated September 29, 2015; and (2) Joint Declaration of Ira A. Schochet and Javier Bleichmar in Support of Class Representatives' Motion for Approval of Proposed Class Action Settlement and Plan of Allocation and Class Counsel's Motion for Award of Attorneys' Fees and Payment of Litigation Expenses, dated September 29, 2015, with annexed exhibits.

Proposed orders will be submitted with Class Representatives' reply submission on or before October 27, 2015, after the deadlines for objecting and seeking exclusion have passed.

Dated: September 29, 2015

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2015, I caused the foregoing Notice of Class Representatives' Motion for Approval of Proposed Class Action Settlement and Plan of Allocation to be served electronically on all ECF participants.

