UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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

Plaintiff,

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

v.

WEATHERFORD INTERNATIONAL, LTD., et al.,

Defendants.

NOTICE OF CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS FEES AND PAYMENT OF LITIGATION EXPENSES

BLEICHMAR FONTI

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Class Counsel and Counsel for Court-Appointed Co-Lead Plaintiff and Class Representative Anchorage Police & Fire Retirement System

LABATON SUCHAROW LLP

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Class Counsel and Counsel for Court-Appointed Co-Lead Plaintiff and Class Representative Sacramento City Employees' Retirement System

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PLEASE TAKE NOTICE that Labaton Sucharow LLP and Bleichmar Fonti Tountas & Auld LLP, Court-appointed Class Counsel and counsel for Anchorage Police & Fire Retirement System and Sacramento City Employees' Retirement System, will move this Court on November 3, 2015, before the Honorable Lewis A. Kaplan for an order, pursuant to Rules 23(h) and 54 of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. §78u-4(a)(4) ("PSLRA"): (1) awarding attorneys' fees; (2) paying litigation expenses incurred in prosecuting the Action; and (3) reimbursing Class Representatives Anchorage Police & Fire Retirement System and Sacramento City Employees' Retirement System for their reasonable costs and expenses (including lost wages) directly related to the representation of the Class, pursuant to the PSLRA.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Class Counsel submit and are filing herewith the: (1) Memorandum of Law in Support of Class Counsel's Motion for Award of Attorneys' Fees and Payment of Litigation Expenses, 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.

A proposed order will be submitted with Class Counsel's reply submission on or before October 27, 2015, after the deadline for objections has passed. Dated: September 29, 2015

LABATON SUCHAROW LLP

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Class Counsel and Counsel for Court-Appointed Co-Lead Plaintiff and Class Representative Sacramento City Employees' Retirement System Respectfully submitted,

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Class Counsel and Counsel for Court-Appointed Co-Lead Plaintiff and Class Representative Anchorage Police & Fire Retirement System

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2015, I caused the foregoing Notice of Class Counsel's Motion for Award of Attorneys' Fees and Payment of Litigation Expenses to be served via ECF on all ECF Participants.

> <u>/s/ Joel H. Bernstein</u> Joel H. Bernstein