

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: SUNEDISON, INC. SECURITIES
LITIGATION

Civil Action No. 1:16-md-2742-PKC

This Document Relates To:

Horowitz et al. v. SunEdison, Inc. et al.,
Case No. 1:16-cv-07917-PKC

**NOTICE OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Providing for Settlement Notice dated July 16, 2019 (ECF No. 321), and upon (a) the Declaration of Salvatore J. Graziano in Support of: (I) Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (c) all other papers and proceedings herein, Plaintiffs, the Municipal Employees' Retirement System of Michigan and Arkansas Teacher Retirement System (collectively, "Plaintiffs"), on behalf of themselves and the Class, will and do hereby move this Court, before the Honorable P. Kevin Castel, on October 25, 2019 at 2:00 p.m. in Courtroom 11D of the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York, New York 10007, or at such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair, reasonable, and adequate. A proposed Judgment and Order granting the requested relief will be submitted with Plaintiffs' reply papers after the deadline for objecting to the Settlement and the proposed Plan of Allocation has passed.

Dated: September 20, 2019

Respectfully submitted,

/s/ Salvatore J. Graziano
**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Max W. Berger
Salvatore J. Graziano
Katherine M. Sinderson
Adam D. Hollander
1251 Avenue of the Americas
New York, NY 10020
Tel: (212) 554-1400
Fax: (212) 554-1444
Email: mwb@blbglaw.com
salvatore@blbglaw.com
katiem@blbglaw.com
adam.hollander@blbglaw.com

***Lead Counsel for Lead Plaintiff
and the Class***

#1324363