

**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 LEAD COUNSEL'S MOTION FOR  
ATTORNEYS' FEES AND LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) 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 Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; and (c) all other papers and proceedings herein, Lead Counsel, will and does 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 an Order awarding attorneys' fees and litigation expenses. A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: September 20, 2019

Respectfully submitted,

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

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***Lead Counsel for Lead Plaintiff  
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