

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE INITIAL PUBLIC OFFERING
SECURITIES LITIGATION

This document relates to all cases.

21 MC 92 (SAS)

**NOTICE OF MOTION FOR FINAL APPROVAL OF SETTLEMENT, PLAN OF
DISTRIBUTION, CLASS CERTIFICATION, AND APPLICATION FOR AN
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE, that Plaintiffs hereby move for an Order:

- (a) approving the Stipulation and Agreement of Settlement;
- (b) certifying the Settlement Classes for the purposes of the Stipulation only;
- (c) approving the plan of distribution as set forth in the Stipulation;
- (d) approving the application for an award of attorneys' fees and reimbursement of expenses for Plaintiffs' Counsel; and
- (e) an award of reasonable costs and expenses to representative plaintiffs.

August 25, 2009
New York, New York

Respectfully submitted,

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