

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DONALD P. BOLAND and MARY A.	:	Civil Action No. 1:16-cv-03925-LLS
BOLAND, Individually and on Behalf of All	:	
Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiffs,	:	LEAD PLAINTIFF’S NOTICE OF MOTION
	:	AND MOTION FOR FINAL APPROVAL OF
vs.	:	SETTLEMENT AND APPROVAL OF PLAN
	:	OF ALLOCATION
GERDAU S.A., et al.,	:	
	:	
Defendants.	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Policemen’s Annuity and Benefit Fund of Chicago, on behalf of the Class, through counsel, will move this Court on October 20, 2017, at 12:00 p.m., before the Honorable Louis L. Stanton, for entry of orders and judgments, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) granting final approval of the settlement; and (2) approving the proposed Plan of Allocation. This motion is based on: (i) the Memorandum of Law in Support of Lead Plaintiff’s Motion for Final Approval of Settlement and Approval of Plan of Allocation; (ii) the Declaration of Henry Rosen in Support of Lead Plaintiff’s Motion for Final Approval of Settlement and Approval of Plan of Allocation and Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses and Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Carole K. Sylvester; (iv) the Declaration of Lead Plaintiff; (v) the Stipulation of Settlement; and (vi) all other proceedings herein.

Proposed orders will be submitted with Lead Plaintiff's reply submission on or before October 13, 2017.

DATED: September 22, 2017

Respectfully submitted,

s/ Ellen Gusikoff Stewart

Henry Rosen
Ellen Gusikoff Stewart
Susannah R. Conn
ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
henryr@rgrdlaw.com
elleng@rgrdlaw.com
sconn@rgrdlaw.com

Samuel H. Rudman
David A. Rosenfeld
ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
drosenfeld@rgrdlaw.com

Christopher C. Gold
ROBBINS GELLER RUDMAN
& DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)
cgold@rgrdlaw.com

Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Ellen Gusikoff Stewart, hereby certify that on September 22, 2017, I caused a true and correct copy of the attached:

Lead Plaintiff's Notice of Motion and Motion for Final Approval of Settlement and Approval of Plan of Allocation

to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filings to all counsel registered to receive such notice.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART