

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

IN RE THE ESTÉE LAUDER CO., INC.
SECURITIES LITIGATION

Civil Action No. 1:23-cv-10669-AS

Hon. Arun Subramanian

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF PROPOSED
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiffs Macomb County Employees' Retirement System, Macomb County Retiree Health Care Fund, and Wayne County Employees' Retirement System (collectively, "Lead Plaintiffs"), on behalf of themselves and all other members of the proposed Settlement Class, through court-approved Lead Counsel Labaton Keller Sucharow LLP, will move this Court on August 20, 2026 at 2:00 p.m. EDT, before the Honorable Arun Subramanian, in Courtroom 15A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for Orders, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) granting final approval of the proposed Settlement pursuant to the terms set forth in the Stipulation and Agreement of Settlement, dated May 6, 2026 (ECF No. 114-1), and entry of the proposed judgment negotiated by the Parties; (ii) approving the proposed Plan of Allocation for distribution of the proceeds of the Settlement; and (iii) certifying the Settlement Class, for purposes of settlement only.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Plaintiffs submit and are filing herewith: (i) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation, dated July 16, 2026; and (ii) the Declaration of Michael P. Canty in Support of (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses, dated July 16, 2026, with annexed exhibits.

Proposed Orders will be submitted with Lead Plaintiffs' reply submission on or before August 13, 2026, after the deadline for objecting or seeking exclusion has passed.

Dated: July 16, 2026

Respectfully submitted,

LABATON KELLER SUCHAROW LLP

/s/ Michael P. Canty

Michael P. Canty
James T. Christie
Jacqueline R. Meyers
140 Broadway
New York, New York 10005
Telephone: (212) 907-0700
Email: mcanty@labaton.com
jchristie@labaton.com
jmeyers@labaton.com

*Lead Counsel for Lead Plaintiffs Macomb
County Employees' Retirement System,
Macomb County Retiree Health Care
Fund, Wayne County Employees'
Retirement System, and the Proposed
Class*

**VANOVERBEKE MICHAUD &
TIMMONY P.C.**

Thomas C. Michaud
79 Alfred Street
Detroit, Michigan 48201
Telephone: (313) 578-1200
Email: tmichaud@vmtlaw.com

*Additional Counsel for Lead Plaintiffs
Macomb County Employees' Retirement
System, Macomb County Retiree Health
Care Fund, and Wayne County Employees'
Retirement System*

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2026, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered ECF participants.

/s/ Michael P. Canty

MICHAEL P. CANTY