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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

VANCOUVER ALUMNI ASSET
HOLDINGS INC., Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

DAIMLER AG, DIETER ZETSCHE,
BODO UEBBER, and THOMAS
WEBER,

Defendants.

MARIA MUNRO, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

DAIMLER AG, DIETER ZETSCHE,
BODO UEBBER, and THOMAS
WEBER,

Defendants.

Master File No. 16-cv-02942-DSF-KS

Judge: Hon. Dale S. Fischer

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

Case No. 16-cv-03412-DSF-KS

Hearing:

Date: December 14, 2020
Time: 1:30 p.m.
Place: Courtroom 7D
Judge: Hon. Dale S. Fischer

1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on December 14, 2020, at 1:30 p.m., Lead
3 Plaintiff the Public School Retirement System of the School District of Kansas
4 City, Missouri ("Lead Plaintiff"), through its counsel Labaton Sucharow LLP, on
5 behalf of itself and all members of the proposed Settlement Class, will move this
6 Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and
7 (e): (i) granting final approval to the proposed settlement of the above-captioned
8 class action (the "Settlement"); (ii) certifying the Settlement Class pursuant to
9 Rules 23(a) and (b)(3), and appointing Lead Plaintiff as Class Representative and
10 the law firm of Labaton Sucharow LLP as Class Counsel for the Settlement Class;
11 and (iii) approving the proposed Plan of Allocation for the proceeds of the
12 settlement. Defendants do not oppose the granting of final approval of the
13 Settlement consistent with the Motion, and take no position on Lead Counsel's
14 requests for attorneys' fees, expenses, and an award to Lead Plaintiff.

15 The Motion is supported by the accompanying Memorandum of Points and
16 Authorities in Support of Motion for Final Approval of Class Action Settlement
17 and Plan of Allocation and the accompanying Declaration of James W. Johnson in
18 Support of (I) Lead Plaintiff's Motion for Final Approval of Class Action
19 Settlement and Plan of Allocation and (II) Lead Counsel's Motion for an Award
20 of Attorneys' Fees and Payment of Expenses, dated November 9, 2020, and the
21 exhibits attached thereto (filed concurrently herewith); the pleadings and other
22 documents on file in this action; and all other written material or oral argument as
23 may be presented to the Court.

24 Although proposed orders are being submitted herewith pursuant to Local
25 Civil Rule 7-20, updated orders may be submitted with Lead Plaintiff's reply
26 submission on or before December 7, 2020, after the deadlines for seeking
27 exclusion and objecting have passed.

CIVIL LOCAL RULE 7-3

This motion is being filed pursuant to paragraph 20 of the Court's Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for Hearing on Final Approval of Settlement (ECF No. 325).

This motion is made following a conference of counsel pursuant to Local Rule 7-3 in which counsel for Defendants indicated that they do not oppose the granting of final approval of the Settlement consistent with the Motion, and take no position on Lead Counsel's requests for attorneys' fees, expenses, and an award to Lead Plaintiff.

Dated: November 9, 2020

LABATON SUCHAROW LLP

By: /s/ James W. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2020, 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 the e-mail addresses denoted on the attached Electronic Mail Notice List served via ECF on all registered participants only.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 9, 2020

/s/ James W. Johnson
James W. Johnson

Mailing Information for a Case 2:16-cv-02942-DSF-KS Vancouver Alumni Asset Holdings, Inc. v. Daimler AG et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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