

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

IN RE WELLS FARGO & COMPANY  
SECURITIES LITIGATION

Case No. 1:20-cv-04494-JLR-SN

**CLASS ACTION**

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

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated May 16, 2023 (ECF No. 182), Lead Plaintiffs Handelsbanken Fonder AB, the Public Employees' Retirement System of Mississippi, State of Rhode Island, Office of the General Treasurer, on behalf of the Employees' Retirement System of Rhode Island, and the Louisiana Sheriffs' Pension & Relief Fund (collectively, "Lead Plaintiffs"), on behalf of themselves and the Settlement Class, will and do hereby move this Court for entry of an Order (i) approving the Settlement as fair, reasonable, and adequate; and (ii) approving the proposed Plan of Allocation as fair, reasonable, and adequate.

This Motion is supported by (a) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; (b) the Declaration of John C. Browne and Laura H. Posner and exhibits; and (c) all other papers and proceedings herein.

A proposed Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers following the deadline for any objections to the Settlement or the Plan of Allocation.

Dated: August 4, 2023

Respectfully submitted,

/s/ Laura H. Posner\*  
**COHEN MILSTEIN SELLERS & TOLL  
PLLC**

Laura H. Posner (LP-8612)  
88 Pine Street, Fourteenth Floor  
New York, New York 10005  
Tel.: (212) 220-2925  
Fax: (212) 838-7745  
lposner@cohenmilstein.com

Steven J. Toll (admitted *pro hac vice*)  
Julie G. Reiser (admitted *pro hac vice*)  
S. Douglas Bunch (SB-3028)  
Molly J. Bowen (admitted *pro hac vice*) 1100  
New York Avenue, N.W., Suite 500  
Washington, DC 20005

/s/ John C. Browne\*  
**BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP**

John C. Browne (JB-0391)  
Jeroen van Kwawegen (JV-1010)  
Michael D. Blatchley (MB-7279)  
1251 Avenue of the Americas  
New York, New York 10020  
Tel.: (212) 554-1400  
Fax: (212) 554-1444  
johnb@blbglaw.com  
jeroen@blbglaw.com  
michaelb@blbglaw.com

Jonathan D. Uslander (JU-1942)  
Lauren M. Cruz (admitted *pro hac vice*)

Tel.: (202) 408-4600  
Fax: (202) 408-4699  
stoll@cohenmilstein.com  
jreiser@cohenmilstein.com  
dbunch@cohenmilstein.com  
mbowen@cohenmilstein.com

*Counsel for Lead Plaintiffs Public Employees' Retirement System of Mississippi and State of Rhode Island, Office of the General Treasurer, on behalf of the Employees' Retirement System of Rhode Island, and Co-Lead Counsel for the Settlement Class*

2121 Avenue of the Stars  
Los Angeles, California 90067  
Tel.: (310) 819-3470  
jonathanu@blbglaw.com  
lauren.cruz@blbglaw.com

*Counsel for Lead Plaintiffs Handelsbanken Fonder AB and Louisiana Sheriffs' Pension & Relief Fund, and Co-Lead Counsel for the Settlement Class*

**KLAUSNER, KAUFMAN, JENSEN & LEVINSON**

Robert D. Klausner (admitted *pro hac vice*)  
7080 NW 4th Street  
Plantation, Florida 33317  
Tel.: (954) 916-1202  
Fax: (954) 916-1232  
bob@robertdklausner.com

*Additional Counsel for Louisiana Sheriffs' Pension & Relief Fund*

\*All electronic signatures (“/s/”) are signed with consent of counsel pursuant to Rule 8.5 of this Court’s Electronic Case Filing Rules & Instructions, as of July 24, 2023.