

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KHONG MENG CHEW, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

MONEYGRAM INTERNATIONAL, INC.,  
W. ALEXANDER HOLMES, PAMELA H.  
PATSLEY, and LAWRENCE ANGELILLI,

Defendants.

Case No. 1:18-cv-07537

CLASS ACTION

Judge Joan Humphrey Lefkow

**STIPULATION AND ORDER APPOINTING THE NORFOLK COUNTY GROUP  
AS LEAD PLAINTIFF AND APPROVING SELECTION OF COUNSEL**

WHEREAS, several motions for appointment as lead plaintiff and approval of selection of counsel were filed on the January 14, 2019 statutory deadline in the above-captioned securities class action brought pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) on behalf of investors in MoneyGram International, Inc., by: (1) Ozgur Karakurt (“Karakurt”) (Dkt. No. 14); (2) Norfolk County Retirement System (“Norfolk County”, and together with Mr. Karakurt the “Norfolk County Group” or “Movant”) (Dkt. No. 9); (3) Valentim Au (“Au”) (Dkt. No. 19); (4) Jeffrey Shopoff (“Shopoff”) (Dkt. No. 21); and (5) Quang Ho, Sally Guangxia Yu, and Adrian Marcu (the “MGI Investor Group”) (Dkt. No. 26);

WHEREAS, the MGI Investor Group withdrew its motion on January 22, 2019 (Dkt. No. 34);

WHEREAS, Shopoff filed a notice of non-opposition to the competing lead plaintiff motions on February 6, 2019 (Dkt No. 41);

WHEREAS, the Norfolk County Group has the largest financial interest in the outcome of this litigation and both Mr. Karakurt and Norfolk County each has an individual financial interest that is larger than any other movant;

WHEREAS, the Norfolk County Group satisfies the relevant requirements of adequacy and typicality under Rule 23 of the Federal Rules of Civil Procedure;

WHEREAS, the Norfolk County Group is committed to supervising the conduct of this litigation by their counsel and to ensuring that counsel coordinate appropriately and avoid any duplication of effort in the conduct of the litigation;

IT IS HEREBY STIPULATED, that subject to the Court's approval, Mr. Karakurt and Norfolk County agree to serve as Lead Plaintiff as the Norfolk County Group and Levi & Korsinsky, LLP and Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein") agree to serve as Co-Lead Counsel.

**I. APPOINTMENT OF LEAD PLAINTIFF AND APPROVAL OF COUNSEL**

1. The Norfolk County Group has moved this Court to be appointed as Lead Plaintiff in the above-captioned action (the "Action") and to approve the counsel it retained to be Co-Lead Counsel.

2. Having considered the provisions of Section 21D(a)(3)(B) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B), the Court hereby determines that the Norfolk County Group is the most adequate plaintiff and satisfies the requirements of the PSLRA. The Court hereby appoints the Norfolk County Group as Lead Plaintiff to represent the interests of the class.

3. Pursuant to Section 21D(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(v), the Norfolk County Group has selected and retained the law firms of Levi & Korsinsky and Cohen Milstein to serve as Co-Lead Counsel. The Court approves the Norfolk County Group's selection of Co-Lead Counsel.

4. Co-Lead Counsel shall have the following responsibilities and duties, to be carried out either personally or through counsel whom Co-Lead Counsel shall designate:

- a. to coordinate the briefing and argument of any and all motions;
- b. to coordinate the conduct of any and all discovery proceedings;
- c. to coordinate the examination of any and all witnesses in depositions;
- d. to coordinate the selection of counsel to act as spokesperson at all pretrial conferences;
- e. to call meetings of the plaintiffs' counsel as deemed necessary and appropriate from time to time;
- f. to coordinate all settlement negotiations with counsel for defendants;
- g. to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter, and to delegate work responsibilities to selected counsel as may be required;
- h. to coordinate the preparation and filings of all pleadings; and
- i. to supervise all other matters concerning the prosecution or resolution of the claims asserted in the Action.

5. No motion, discovery request, or other pretrial proceedings shall be initiated or filed by any plaintiffs without the approval of Co-Lead Counsel, so as to prevent duplicative pleadings or discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of the Co-Lead Counsel.

6. Service upon any plaintiff of all pleadings, motions, or other papers in the Action, except those specifically addressed to a plaintiff other than the Lead Plaintiff, shall be completed upon service of Co-Lead Counsel.

7. Co-Lead Counsel shall be the contact between plaintiffs' counsel and defendants' counsel, as well as the spokespersons for all plaintiffs' counsel, and shall direct and coordinate the activities of plaintiffs' counsel. Co-Lead Counsel shall be the contact between the Court and plaintiffs and their counsel.

## **II. NEWLY FILED OR TRANSFERRED ACTIONS**

8. When a case that arises out of the subject matter of this Action is hereinafter filed in this Court or transferred from another Court, the Clerk of this Court shall:

- a. file a copy of this Order in the separate file for such action;
- b. mail a copy of this Order to the attorneys for the plaintiff(s) in the newly filed or transferred case and to any new defendant(s) in the newly filed or transferred case; and
- c. make the appropriate entry on the docket for this action.

9. Each new case that arises out of the subject matter of the action that is filed in this Court or transferred to this Court shall be consolidated with the Action and this Order shall apply thereto, unless a party objecting to this Order or any provision of this Order shall, within ten (10) days after the date upon which a copy of this Order is served on counsel for such party, file an application for relief from this Order or any provision herein and this Court deems it appropriate to grant such application.

10. During the pendency of this litigation, or until further order of this Court, the parties shall take reasonable steps to preserve all documents within their possession, custody or control, including computer-generated and stored information and materials such as computerized data and electronic mail, containing information that is relevant to or which may lead to the discovery of information relevant to the subject matter of the pending litigation.

IT IS SO ORDERED.

DATED: 2/12/2019

A handwritten signature in black ink, reading "Joan H. Lefkow". The signature is written in a cursive style with a long, sweeping underline.

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JOAN H. LEFKOW  
U.S. DISTRICT COURT JUDGE