

James E. Cecchi
Donald A. Ecklund
Kevin G. Cooper
**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY &
AGNELLO, P.C.**
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700
Email: jcecchi@carellabyrne.com

Joseph D. Cohen
Kara M. Wolke
Leanne H. Solish
Raymond D. Sulentic
GLANCY PRONGAY & MURRAY LLP
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Email: info@glancylaw.com

*Counsel for Plaintiffs and the Settlement
Class*

*Counsel for Plaintiffs and the Settlement
Class*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE EROS INTERNATIONAL PLC
SECURITIES LITIGATION

C. A. No. 19-cv-14125-ES-JSA

**LEAD PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
CLASS DISTRIBUTION ORDER**

PLEASE TAKE NOTICE that on February 3, 2025, Court-appointed lead plaintiffs Opus Chartered Issuances S.A., Compartment 127 and AI Undertaking IV (collectively, “Lead Plaintiffs”)¹ will, and hereby do, apply to the Honorable Esther Salas, United States District Judge of the United States District Court for the District of New Jersey, in Courtroom PO 03 at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for entry of the accompanying [Proposed] Class Distribution Order (the “Class Distribution Order”), which, among other things, will: (i) approve the Claims Administrator’s recommendations accepting and rejecting Claims submitted in the above-captioned action (the “Action”); (ii) direct the distribution of the Net Settlement Fund to Authorized Claimants whose Claims have been accepted as valid and approved by the Court; and (iii) approve the Claims Administrator’s fees and expenses incurred in connection with the Action.

In support of this motion, Lead Plaintiffs are filing herewith: (i) a Memorandum of Law in Support of Lead Plaintiffs’ Motion for Class Distribution Order; (ii) the Declaration of Jessie Mahn in Support of Lead Plaintiffs’ Motion for Class Distribution Order, and the exhibits attached thereto; and (iii) the Declaration

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated April 4, 2023 (the “Stipulation,” ECF No. 81-3).

of Sharon M. McGowan of the Public Justice Foundation.

While Defendants do not oppose the ultimate relief requested in the Motion, Defendants take no position as to the arguments and factual representations made in support thereof.

Dated: January 10, 2025

Respectfully Submitted

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO,
P.C.**

By: s/ James E. Cecchi
James E. Cecchi
Donald A. Ecklund
Kevin G. Cooper
5 Becker Farm Road
Roseland, New Jersey 07068
Telephone: (973) 994-1700
Email: jcecchi@carellabyrne.com

GLANCY PRONGAY & MURRAY LLP
Joseph D. Cohen
Kara M. Wolke
Leanne Solish
Raymond Sulentic
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Email: jcohen@glancylaw.com

*Counsel for Lead Plaintiffs and the
Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2025, I caused the foregoing to be filed electronically with the Clerk of the Court using the ECF system, which will send notification of such filing to all parties.

Dated: January 10, 2025

Respectfully submitted,

/s/ James E. Cecchi

James E. Cecchi