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**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
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND
PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 85), on November 28, 2023, at 2:00 p.m., before the Honorable Esther Salas in Courtroom PO 03 at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, Court-appointed lead plaintiffs Opus Chartered Issuances S.A., Compartment 127 and AI Undertaking IV (collectively, “Lead Plaintiffs”)¹ will, and hereby do, apply for entry of an Order: (1) granting final approval of the Settlement in the above-captioned action on the terms set forth in the Stipulation; and (2) approving the proposed Plan of Allocation for distribution of the Net Settlement Fund.²

This motion is based on this Notice of Motion; the concurrently filed Memorandum of Law; Joint Declaration of James E. Cecchi and Kara M. Wolke in Support of: (I) Lead Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Class Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and records on file in this Action; and other such matters as the Court

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).

² Proposed orders will be submitted with Lead Plaintiffs’ reply papers, after the deadlines for objections and seeking exclusion have passed.

may consider.

Dated: October 23, 2023

Respectfully Submitted

**CARELLA, BYRNE, CECCHI,
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P.C.**

By: s/ James E. Cecchi

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*Counsel for Lead Plaintiffs
and the Proposed Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2023, 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: October 23, 2023

Respectfully submitted,

/s/ James E. Cecchi

James E. Cecchi