

**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 COUNSEL'S NOTICE OF MOTION AND MOTION
FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated May 16, 2023 (ECF No. 182), Lead Counsel will and do hereby move this Court for entry of an Order awarding attorneys' fees and litigation expenses.

This Motion is supported by (a) the Memorandum of Law in Support of Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (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 motion.

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
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,*

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*)
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*

*on behalf of the Employees' Retirement System
of Rhode Island, 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.