

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

IN RE FACEBOOK, INC. IPO SECURITIES
AND DERIVATIVE LITIGATION

MDL No. 1:12-md-02389-CM-GWG

This document relates to the
Consolidated Securities Action:

No. 12-cv-4081	No. 12-cv-4763
No. 12-cv-4099	No. 12-cv-4777
No. 12-cv-4131	No. 12-cv-5511
No. 12-cv-4150	No. 12-cv-7542
No. 12-cv-4157	No. 12-cv-7543
No. 12-cv-4184	No. 12-cv-7544
No. 12-cv-4194	No. 12-cv-7545
No. 12-cv-4215	No. 12-cv-7546
No. 12-cv-4252	No. 12-cv-7547
No. 12-cv-4291	No. 12-cv-7548
No. 12-cv-4312	No. 12-cv-7550
No. 12-cv-4332	No. 12-cv-7551
No. 12-cv-4360	No. 12-cv-7552
No. 12-cv-4362	No. 12-cv-7586
No. 12-cv-4551	No. 12-cv-7587
No. 12-cv-4648	

**NOTICE OF LEAD PLAINTIFFS' MOTION
FOR APPROVAL OF DISTRIBUTION PLAN**

TO: All Counsel of Record,

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Approving Plan of Allocation of Net Settlement Fund filed November 26, 2018 (ECF No. 602), and upon (a) the accompanying Memorandum in Support of Lead Plaintiffs' Motion for Approval of Distribution Plan; (b) the accompanying Declaration of Adam D. Walter in Support of Lead Plaintiffs' Motion for Approval of Distribution Plan (the "Walter

Declaration”)¹ submitted on behalf of the Court-approved Claims Administrator, A.B. Data, Ltd. (“A.B. Data”); and (c) all other papers and proceedings herein, Lead Plaintiffs Arkansas Teacher Retirement System and Fresno County Employees’ Retirement Association, on behalf of themselves and the Class, will and do hereby move this Court for entry of the accompanying [Proposed] Order Approving Distribution Plan (the “Class Distribution Order”), which would, *inter alia*: (i) approve the administrative determinations of A.B. Data accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action as stated in the Walter Declaration; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by A.B. Data as valid and approved by the Court (“Authorized Claimants”) upon the Effective Date of the Settlement, while maintaining a Reserve for any contingencies that may arise; (iii) direct that distribution checks state that the check must be cashed within 120 days after the issue date; (iv) direct that Authorized Claimants will forfeit all recovery from the Settlement if they fail to cash their distribution checks in a timely manner; (v) approve the recommended plan for any funds remaining after the distribution; (vi) approve A.B. Data’s fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (vii) release claims related to the administration process; and (viii) authorize the destruction of Claim Forms and supporting documents at an appropriate time.

Under the Stipulation, Defendants have no role in or responsibility for the administration of the Settlement Fund or processing of Claims, including determinations as to the validity of Claims or the distribution of the Net Settlement Fund. *See* Stipulation ¶¶ 18, 23. Nevertheless, we

¹ All terms with initial capitalization not otherwise defined herein have the meanings ascribed to them in the Walter Declaration or in the Stipulation and Agreement of Settlement dated February 26, 2018 (the “Stipulation”) (ECF No. 571-1).

have given Defendants the opportunity to fully review this motion and they have confirmed that they do not oppose this motion.

Dated: March 18, 2021

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ John Rizio-Hamilton

Salvatore J. Graziano
John Rizio-Hamilton
1251 Avenue of the Americas, 44th Floor
New York, NY 10020
Tel: (212) 554-1400
Fax: (212) 554-1444

*Co-Lead Counsel for Lead Plaintiffs
and the Class*

LABATON SUCHAROW LLP

Thomas A. Dubbs
James W. Johnson
Thomas G. Hoffman, Jr.
140 Broadway
New York, New York 10005
Tel: (212) 907-0700
Fax: (212) 818-0477

*Co-Lead Counsel for Lead Plaintiffs and the
Class*