

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

IN RE ROMEO POWER INC.
SECURITIES LITIGATION

Case No. 1:21-cv-03362-LGS

**NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court's Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 197), on July 10, 2024 at 3:45 p.m., before the Honorable Lorna G. Schofield in Courtroom 1106 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Lead Counsel Glancy Prongay & Murray LLP, will, and hereby does, move the Court for entry of an Order awarding attorneys' fees in the amount of 30% of the Settlement Fund (or \$4,470,000, plus interest earned at the same rate as the Settlement Fund) and reimbursement of Litigation Expenses in the total amount of \$475,341.74 (comprised of \$395,341.74 in out-of-pocket costs incurred by Lead Counsel, as well an aggregate of \$80,000 to Court-appointed Lead Plaintiff Mike Castleberg (\$20,000), and additional named plaintiffs Joshua Cante, Nathaniel Tapia, Artur Chimchirian, and Van Nguyen (\$15,000 each), as authorized by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4)).¹

The hearing will be held telephonically, the call-in number is (888) 363-4749, and the access code is 558-3333.

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Gregory B. Linkh in support of: (I) Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Settlement dated December 7, 2023 (ECF No. 191-1).

Dated: June 5, 2024

GLANCY PRONGAY & MURRAY LLP

By: /s/ Gregory B. Linkh

Gregory B. Linkh
230 Park Avenue, Suite 358
New York, New York 10169
Telephone: (212) 682-5340
Email: glinkh@glancylaw.com

-and-

GLANCY PRONGAY & MURRAY LLP

Kara M. Wolke (admitted *pro hac vice*)
Melissa C. Wright (admitted *pro hac vice*)
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Email: kwolke@glancylaw.com
mwright@glancylaw.com

*Attorneys for Plaintiffs and the Proposed
Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of Court via the CM/ECF system, which will send Notice of such filing to all counsel of record.

Dated: June 5, 2024

/s/ Gregory B. Linkh
Gregory B. Linkh