

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

PLYMOUTH COUNTY RETIREMENT SYSTEM,  
Individually and On Behalf of All Others Similarly  
Situated,

Case No. 1:19-cv-00982-CMH-MSN

Plaintiff,

v.

GTT COMMUNICATIONS, INC., RICHARD D.  
CALDER, JR., CHRIS MCKEE, MICHAEL  
SICOLI, and GINA NOMELLINI,

Defendants.

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**LEAD PLAINTIFF’S MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, PLAN OF ALLOCATION AND REQUEST FOR  
ATTORNEYS’ FEES AND EXPENSES**

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Pursuant to Federal Rule of Civil Procedure 23, the Private Securities Litigation Reform Act, 15 U.S.C. 78u-4(a)(4) (“PSLRA”), and this Court’s Order Preliminarily Approving Settlement and Providing for Notice dated January 28, 2021 (ECF No. 89), Lead Plaintiff City of Atlanta Police Pension Fund and City of Atlanta Firefighters’ Pension Fund (“Lead Plaintiff” or “Plaintiff”), on behalf of itself and the proposed Settlement Class, respectfully moves this Court for entry of an order granting final approval of the Settlement and the Plan of Allocation, and awarding attorneys’ fees and reimbursement of Litigation Expenses. The specific terms of

the Settlement are set forth in the Stipulation and Agreement of Settlement (the “Stipulation”), which was previously filed with the Court (ECF No. 84-1).<sup>1</sup>

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Lester R. Hooker in Support of Lead Plaintiff’s Motion for Final Approval of Class Action Settlement, Plan of Allocation and Request for Attorneys’ Fees and Expenses and the exhibits thereto, the record and proceedings in this Action, and such other matters the Court may consider at the time of the hearing.

Pursuant to Local Civil Rule 7, Lead Counsel has conferred with Defendants’ Counsel and certifies that Defendants do not oppose final approval of the Settlement, and take no position as to the Plan of Allocation and the attorneys’ fees and litigation expense reimbursement request.

For the Court’s convenience, a proposed order granting the requested relief will be submitted with Lead Plaintiff’s reply submission on or before April 16, 2021.

Dated: March 19, 2021

Respectfully submitted,

/s/ Steven J. Toll

Steven J. Toll

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*Liaison Counsel for Lead Plaintiff and the*

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the same meanings ascribed to them in the Stipulation.

*Proposed Settlement Class*

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*Lead Counsel for Lead Plaintiff and the  
Proposed Settlement Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 19, 2021, I caused to be electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all of the registered participants.

*/s/ Steven J. Toll*  
Steven J. Toll