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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In re VALEANT PHARMACEUTICALS) Master No. 3:15-cv-07658-MAS-LHG
INTERNATIONAL, INC. SECURITIES)
LITIGATION) CLASS ACTION

_____)
This Document Relates To:) Judge Michael A. Shipp
) Magistrate Judge Lois H. Goodman
)
SECURITIES CLASS ACTION.) Special Master Dennis M. Cavanaugh,
) U.S.D.J. (ret.)
_____)

NOTICE OF MOTIONS FOR
(1) FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN
OF ALLOCATION; AND (2) AN
AWARD OF ATTORNEYS' FEES
AND EXPENSES AND AWARDS TO
PLAINTIFFS PURSUANT TO
15 U.S.C. §78u-4(a)(4)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the following accompanying documents:

- Memorandum in Support of Motion for Final Approval of Class Action Settlement and Plan of Allocation;
- Memorandum in Support of Motion for an Award of Attorneys' Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4);
- Declaration of James E. Barz in Support of Motions for (1) Final Approval of Class Action Settlement and Plan of Allocation; and (2) an Award of Attorneys' Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4);
- Declaration of Christopher A. Seeger in Support of Motions for (1) Final Approval of Class Action Settlement and Plan of Allocation; and (2) an Award of Attorneys' Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4);
- Declaration of Robert J. Robbins Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Jennifer Scullion Filed on Behalf of Seeger Weiss LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Shelly L. Friedland Filed on Behalf of Trief & Olk in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Frank J. Johnson Filed on Behalf of Johnson Fistel, LLP in Support of Application for Award of Attorneys' Fees and Expenses;
- Declaration of Laurie A. Gomez on Behalf of Lead Plaintiff TIAA;
- Declaration of David Ray on Behalf of Named Plaintiff IBEW Local Union 481 Defined Contribution Plan and Trust;
- Declaration of Roy Arthur Cuaron on Behalf of Named Plaintiff City of Tucson with and on Behalf of Tucson Supplemental Retirement System;

- Declaration of Ross D. Murray Regarding Notice Dissemination, Publication, and Requests for Exclusion Received to Date; and
- all prior pleadings and papers filed herein, and any arguments of counsel or other matters properly before the Court,

Lead Plaintiff TIAA, by its undersigned attorneys, will move this Court on May 27, 2020 at 10:00 a.m., by way of a telephonic Final Approval Hearing (*see* ECF No. 535), for: (1) final approval of the proposed Settlement and Plan of Allocation, and (2) an award of attorneys' fees and expenses and awards to Plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4).

DATED: April 22, 2020

Respectfully submitted,

SEEGER WEISS LLP
CHRISTOPHER A. SEEGER
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s/ Christopher A. Seeger
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