

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: COMMERCIAL DIVISION**

CAMELOT EVENT DRIVEN FUND, A SERIES
OF FRANK FUNDS TRUST, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

MORGAN STANLEY & CO. LLC, J.P. MORGAN
SECURITIES, LLC, CITIGROUP GLOBAL
MARKETS INC., GOLDMAN SACHS & CO. LLC,
MIZUHO SECURITIES USA LLC, SIEBERT
WILLIAMS SHANK & CO., LLC, BNP PARIBAS
SECURITIES CORP., RBC CAPITAL MARKETS,
LLC, U.S. BANCORP INVESTMENTS, INC.,
SMBC NIKKO SECURITIES AMERICA, INC.,
TD SECURITIES (USA) LLC, SG AMERICAS
SECURITIES, LLC, MUFG SECURITIES
AMERICAS INC., CASTLEOAK SECURITIES,
L.P., SAMUEL A. RAMIREZ & COMPANY,
INC., ACADEMY SECURITIES, INC.,
R. SEELAUS & CO., LLC, WELLS FARGO
SECURITIES, LLC, BNY MELLON CAPITAL
MARKETS, LLC, INTESA SANPAOLO S.P.A.,
ICBC STANDARD BANK PLC, VIACOMCBS,
INC., ROBERT M. BAKISH, KATHERINE GILL-
CHAREST, SHARI E. REDSTONE, CANDACE K.
BEINECKE, BARBARA M. BYRNE, LINDA M.
GRIEGO, ROBERT N. KLIEGER, JUDITH A.
MCHALE, RONALD L. NELSON, CHARLES E.
PHILLIPS, JR., SUSAN SCHUMAN, NICOLE
SELIGMAN, and FREDERICK O. TERRELL,

Defendants.

Index No. 654959/2021

Hon. Andrew Borrok
Part 53

**NOTICE OF PLAINTIFFS'
MOTION FOR FINAL
APPROVAL OF CLASS
ACTION SETTLEMENT AND
PLAN OF ALLOCATION**

Oral Argument Requested

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Joint
Affirmation of Daniella Quitt and John Rizio-Hamilton dated July 1, 2025, and the Exhibits

attached thereto, and all prior pleadings and proceedings herein, Plaintiffs Camelot Event Driven Fund, A Series Of Frank Funds Trust and Municipal Police Employees' Retirement System ("Plaintiffs"), on behalf of themselves and the Class, will, in accordance with this Court's Order Preliminarily Approving Settlement and Providing for Notice dated April 3, 2025 (NYSCEF No. 1602) (the "Preliminary Approval Order"), move this Court in the Motion Submission Part, Room 130, 60 Centre Street, New York, New York 10007, on the 5th day of August, 2025, at 9:30 a.m., or as soon thereafter as counsel can be heard, for Orders pursuant to New York Civil Practice Law and Rules ("CPLR") Article 9, granting: (1) final approval of the proposed \$120 million settlement (the "Settlement") of this securities class action; and (2) approval of the proposed plan of allocation of the net proceeds of the Settlement.

In accordance with the schedule ordered by the Court in the Preliminary Approval Order, any objections or requests for exclusion must be submitted by July 15, 2025. Plaintiffs' reply papers are due by July 29, 2025. The proposed Orders will be submitted with Plaintiffs' reply papers.

Dated: New York, New York
July 1, 2025

GLANCY PRONGAY & MURRAY LLP

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: s/ Daniella Quitt

Daniella Quitt
745 Fifth Avenue, 5th Floor
New York, New York 10151
Telephone: (212) 935-7400
dquitt@glancylaw.com
and
Robert V. Prongay
Kara M. Wolke
Christopher Fallon
1925 Century Park East, Suite 2100
Los Angeles, California 90067

By: s/ John Rizio-Hamilton

John Rizio-Hamilton
Rebecca E. Boon
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 554-1400
johnr@blbglaw.com
Rebecca.Boon@blbglaw.com

Telephone: (310) 201-9150
rprongay@glancylaw.com
kwolke@glancylaw.com
cfallon@glancylaw.com

Counsel for Plaintiffs and Co-Class Counsel