

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
CONSTRUCTION LABORERS PENSION TRUST FOR SOUTHERN CALIFORNIA, GENE SAMIT and JOHN LANTZ, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 1:18-cv-07796-VEC
	:	(Consolidated)
	:	
	:	<u>CLASS ACTION</u>
	:	
Plaintiffs,	:	LEAD PLAINTIFF’S NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION
vs.	:	
	:	
CBS CORPORATION and LESLIE MOONVES,	:	
	:	
Defendants.	:	
<hr/>		X

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Construction Laborers Pension Trust for Southern California (“Lead Plaintiff”), on behalf of the Settlement Class, by its undersigned counsel, will move this Court on November 3, 2022, at 2:30 p.m., before the Honorable Valerie E. Caproni at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 443, New York, New York 10007, or as soon thereafter as the parties can be heard, for the entry of orders and a judgment, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) for the purposes of settlement only, certifying the Settlement Class, certifying Lead Plaintiff as the class representative on behalf of the Settlement Class and appointing Lead Counsel as Class Counsel for the Settlement Class; (ii) granting final approval of the proposed Settlement between Lead Plaintiff and CBS Corporation n/k/a Paramount Global and Leslie Moonves, as set forth in the Stipulation and Agreement of

Settlement, previously filed with the Court (ECF 177); (iii) approving the proposed Plan of Allocation; and (iv) for such further relief as is just.¹

In support of this motion, Lead Plaintiff relies on: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; (ii) the Declaration of Spencer A. Burkholz in Support of: (1) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Lead Plaintiff; (iv) the Declaration of Ross D. Murray; (v) the Stipulation and Agreement of Settlement; and (vi) all other proceedings herein.

Proposed orders will be submitted with Lead Plaintiff's reply submission on or before October 27, 2022.

DATED: August 19, 2022

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
VINCENT M. SERRA



VINCENT M. SERRA

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
vserra@rgrdlaw.com

¹ Unless stated otherwise, all capitalized terms used herein have the meanings set forth and defined in the Stipulation and Agreement of Settlement.

ROBBINS GELLER RUDMAN
& DOWD LLP
SPENCER A. BURKHOLZ
ELLEN GUSIKOFF STEWART
JONAH H. GOLDSTEIN
LAURIE L. LARGENT
LAURA ANDRACCHIO
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
spenceb@rgrdlaw.com
elleng@rgrdlaw.com
jonahg@rgrdlaw.com
llargent@rgrdlaw.com
landracchio@rgrdlaw.com

Lead Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 19, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ VINCENT M. SERRA

VINCENT M. SERRA

ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Email: vserra@rgrdlaw.com

Mailing Information for a Case 1:18-cv-07796-VEC Samit v. CBS Corporation et al**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Laura Andracchio**
LAndracchio@rgrdlaw.com
- **Mary Katherine Blasy**
mblasy@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **David W. Brown**
dbrown@paulweiss.com,Mao_fednational@paulweiss.com
- **Spencer A. Burkholz**
spenceb@rgrdlaw.com,e_file_sd@rgrdlaw.com,kjohnson@rgrdlaw.com,scaesar@rgrdlaw.com
- **Steven M. Cady**
scady@wc.com
- **Alexander Leonard Cheney**
acheney@willkie.com,maosdny@willkie.com
- **Todd G. Cosenza**
tcosenza@willkie.com,maosdny@willkie.com
- **Scott A Edelman**
sedelman@gibsondunn.com
- **Zeh Sheena Ekono**
maosdny@willkie.com,zekono@willkie.com
- **Brad D. Feldman**
bfeldman@paulweiss.com,mao_fednational@paulweiss.com
- **Jonah H. Goldstein**
jonahg@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Richard Francis Hans , Jr**
Richard.Hans@dlapiper.com,ivy.hamlin@dlapiper.com,DocketingNewYork@dlapiper.com,new-york-docketing-7871@ecf.pacerpro.com,richard-hans-7005@ecf.pacerpro.com
- **Joseph Alexander Hood , II**
ahood@pomlaw.com,disaacson@pomlaw.com,ashmatkova@pomlaw.com,abarbosa@pomlaw.com
- **Phillip C. Kim**
pkim@rosenlegal.com,pkrosenlaw@ecf.courtdrive.com
- **Daniel Jonathan Kramer**
dkramer@paulweiss.com,bmcginty@paulweiss.com,mao_fednational@paulweiss.com
- **Laurie L. Largent**
llargent@rgrdlaw.com
- **Andrew J. Levander**
andrew.levander@dechert.com,christopher.ruhland@dechert.com,nycmanagingclerks@dechert.com,AutoDocket@dechert.com,9833472420@filings.docketbird.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,ahood@pomlaw.com,asoto@pomlaw.com,disaacson@pomlaw.com,ashmatkova@pomlaw.com,abarbosa@pomlaw.com
- **Angela Liu**
angela.liu@dechert.com
- **Jessica Ann Masella**
Jessica.Masella@dlapiper.com,jessica-masella-8419@ecf.pacerpro.com
- **Margaret Mortimer**
margaret.mortimer@dechert.com
- **Rahul Mukhi**
rmukhi@cgsh.com,maofiling@cgsh.com
- **Tariq Mundiya**
maosdny@willkie.com,tmundiya@willkie.com
- **Sharon L. Nelles**
NELLESS@SULLCROM.COM,s&cmanagingclerk@sullcrom.com,sharon-nelles-8045@ecf.pacerpro.com
- **New York Office of the Attorney General**
shamiso.maswoswe@ag.ny.gov

- **Beth Deborah Newton**
newtonb@sullcrom.com,s&cmanagingclerk@sullcrom.com,beth-newton-9897@ecf.pacerpro.com
- **Jonathan Bradley Pitt**
jpitt@wc.com,jonathan-pitt-1187@ecf.pacerpro.com
- **Andrew R. Podolin**
APodolin@perkinscoie.com,RKOManagingClerk@rkollp.com
- **Matthew McPherson Balf Riccardi**
MRiccardi@perkinscoie.com,MAplogan@perkinscoie.com,michellerose@perkinscoie.com,docketnyc@perkinscoie.com,nvargas@perkinscoie.com
- **Lee S Richards , III**
LeeRichards@perkinscoie.com,michellerose@perkinscoie.com,nvargas@perkinscoie.com
- **Katharine Rodgers**
rodgersk@sullcrom.com,katherine-rodgers-0146@ecf.pacerpro.com,s&cmanagingclerk@sullcrom.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,drosenfeld@ecf.courtdrive.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Vincent Michael Serra**
vserra@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Audra Jan Soloway**
asoloway@paulweiss.com,mao_fednational@paulweiss.com
- **Ellen Anne Gusikoff Stewart**
elleng@rgrdlaw.com
- **Brendan V. Sullivan , Jr**
bsullivan@wc.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

John Lantz

,