

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

IN RE: SYNCHRONY FINANCIAL
SECURITIES LITIGATION

No. 3:18-cv-1818-VAB

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

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated April 12, 2023 (ECF No. 233), and upon (i) the Declaration of Adam H. Wierzbowski in Support of: (A) Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (B) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (ii) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation; and (iii) all other papers and proceedings herein, Lead Plaintiff Stichting Depository APG Developed Markets Equity Pool and Plaintiff Stichting Depository APG Fixed Income Credits Pool (collectively, "Plaintiffs") will and hereby do move this Court, before the Honorable Victor A. Bolden, on July 31, 2023, at 10:00 a.m., for entry of a Judgment approving the Settlement as fair, reasonable, and adequate, and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. A proposed Judgment and proposed Order granting the requested relief will be submitted with Plaintiffs' reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Class have passed.

Dated: June 26, 2023

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Adam H. Wierzbowski

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and Plaintiff Stichting Depository APG Fixed
Income Credits Pool and the Class*

CERTIFICATE OF SERVICE

I certify that on June 26, 2023, a copy of the foregoing Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Adam H. Wierzbowski _____
Adam H. Wierzbowski (admitted *pro hac vice*)