

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE VIVENDI UNIVERSAL, S.A.  
SECURITIES LITIGATION

C.A. No. 02 Civ. 5571 (PAE)

**CLASS PLAINTIFFS' NOTICE OF MOTION AND MOTION  
FOR APPROVAL OF SETTLEMENT OF CLAIMS OF RELIANCE CLAIMANTS  
AND FOR REIMBURSEMENT OF ADDITIONAL EXPENSES**

PLEASE TAKE NOTICE that, pursuant to the Court's Preliminary Approval, Notice, and Hearing Order, dated April 12, 2017 (Dkt. 1311), Class Plaintiffs, by Lead Counsel Abbey Spanier LLP, shall move, and hereby do move, for approval of the proposed settlement ("Settlement") of the claims of 96 class members whose claims were previously dismissed for lack of reliance ("Reliance Claimants"), before the Honorable Paul A. Engelmayer, in Courtroom 1305 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, on May 9, 2017, at 5:00 p.m., or at such other time or manner as may be directed by the Court. This motion also seeks Court approval of reimbursement of additional expenses incurred in prosecuting this litigation in an amount of \$104,462.06.

This motion is based upon the Declaration of Arthur N. Abbey; the Declaration of Stephen J. Cirami; the Class Plaintiffs' Memorandum of Law in Support of Motion for Approval of Settlement for Reliance Claimants and for Reimbursement of Additional Expenses; the record and proceedings in this action; and such other matter as the Court may consider at the time of the

hearing.

Dated: April 21, 2017

Respectfully submitted,

/s/ Arthur N. Abbey  
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