

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PASHA S. ANWAR, *et al.*,

Plaintiffs,

v.

FAIRFIELD GREENWICH LIMITED, *et al.*,

Defendants.

This Document Relates To: 09-cv-118 (VM)

Master File No. 09-cv-118 (VM)

**NOTICE OF MOTION FOR (I) PRELIMINARY APPROVAL OF THE PARTIAL
GLOBEOP CLASS ACTION SETTLEMENT, (II) PRELIMINARY CERTIFICATION
OF THE CLASS FOR PURPOSES OF SETTLEMENT, (III) APPROVAL OF
NOTICE TO THE CLASS, AND (IV) SCHEDULING OF A SETTLEMENT HEARING**

PLEASE TAKE NOTICE that the Representative Plaintiffs,¹ on their own behalf and on behalf of the GlobeOp Settlement Class, through counsel, hereby move this Court before the Honorable Victor Marrero, for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: preliminarily approving the proposed partial class action settlement; preliminarily certifying the GlobeOp Settlement Class for settlement purposes only; approving the proposed forms of the Notice of Proposed Partial Settlement of Class Action and Settlement Fairness Hearing and Motion for Attorneys' Fees and Reimbursement of Expenses, and the Summary Notice of Proposed Partial Settlement; approving the proposed methods of disseminating notice; approving Rust Consulting as

¹ All capitalized terms not otherwise defined herein have the same meanings as set forth in the Stipulation of Settlement dated as of August 27, 2013 (the "Stipulation"), filed herewith.

Claims Administrator; setting a date for the Settlement Hearing; and such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Representative Plaintiffs submit herewith: Plaintiffs' Memorandum of Law in Support of their Motion for (i) Preliminary Approval of Partial GlobeOp Settlement, (ii) Preliminary Certification of the Class for Purposes of Settlement, (iii) Approval of Notice to the Class, and (iv) Scheduling of a Settlement Hearing; and the accompanying Stipulation of Settlement dated as of August 27, 2013, with exhibits appended thereto, including the Proposed Order Preliminarily Approving Settlement and Providing for Notice of Proposed Settlement.

Dated: August 29, 2013

Respectfully submitted,

By: /s/ Robert C. Finkel
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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2013, I caused true and correct copies of the foregoing to be served by ECF on all parties registered with the Court's ECF system under docket number 09-CV-118 (VM).

/s/ Natalie M. Mackiel

Natalie M. Mackiel