UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NIZAR SAMI AYOUB, on behalf of himself and a class of similarly situated investors, Plaintiff, v. SPECTRUM PHARMACEUTICALS, INC., THOMAS J. RIGA, and FRANCOIS J. LEBEL, Defendants.	Case No. 1:22-cv-10292 (VEC) (Consolidated) **NOTICE OF LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES, AND AWARD TO LEAD PLAINTIFF UNDER 15 U.S.C. § 78u-4(a)(4)**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, and Award to Lead Plaintiff Under 15 U.S.C. § 78u-4(a)(4); the Declaration of Jeffrey P. Campisi in Support of (1) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and in Opposition to Pro Se Plaintiff and Former Lead Plaintiff Steven B. Christiansen's Objection to the Settlement and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, and Award to Lead Plaintiff Under 15 U.S.C. § 78u-4(a)(4), dated October 16, 2026, and the exhibits annexed thereto, including the Declaration of Nizar Sami Ayoub and the Declaration of Josephine Bravata, and the Declaration of Jeffrey P. Campisi Filed on Behalf of Kaplan Fox & Kilsheimer LLP in Support of Application for Award of Attorneys' Fees and Expenses and the exhibits thereto; the Stipulation of Settlement dated June 1, 2026 (ECF No. 190-1) (the "Stipulation"); the Court's Order preliminarily approving the Settlement, entered June 22, 2026 (ECF No. 199), and all prior pleadings and proceedings in this Action, Court-appointed Lead Counsel Kaplan Fox & Kilsheimer LLP ("Lead Counsel") will move the Court for an order:

(a) awarding Lead Counsel attorneys' fees in the amount of 25% of the Settlement Fund (i.e., $1,750,000, plus interest earned thereon at the same rate as the Settlement Fund);

(b) awarding Lead Counsel payment of $248,317.27 in litigation expenses reasonably and necessarily incurred in prosecuting the Action;

(c) awarding Lead Plaintiff Nizar Sami Ayoub $7,500, pursuant to 15 U.S.C. § 78u-4(a)(4), for costs and expenses, including lost time, directly related to his representation of the Class; and

(d) granting such other and further relief as the Court deems just and proper.

The Preliminary Approval Order provided that a hearing (the "Settlement Hearing") shall be held before this Court on November 20, 2026, at 10:00 A.M., in Courtroom 20C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, to determine: (a) whether the proposed Settlement of the Litigation on the terms and conditions provided for in the Stipulation is fair, reasonable, and adequate to the Class and should be approved by the Court; (b) whether a Judgment, as provided in ¶1.13 of the Stipulation, should be entered; (c) whether the proposed Plan of Allocation is fair, reasonable, and adequate and should be approved; (d) the amount of fees and expenses that should be awarded to Lead Counsel and Lead Plaintiff; and (e) any such other matters as the Court may deem appropriate.

Dated: October 16, 2026

KAPLAN FOX & KILSHEIMER LLP

/s/ *Jeffrey P. Campisi*
Robert N. Kaplan
Jeffrey P. Campisi
Brandon Fox
Jennifer Ligansky
800 Third Avenue, 38th Floor
New York, NY 10022
T: 212-687-1980
F: 212-687-7714
rkaplan@kaplanfox.com
jcampisi@kaplanfox.com
bfox@kaplanfox.com
jligansky@kaplanfox.com

Lead Counsel for Lead Plaintiff Nizar Sami Ayoub and the Class