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 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**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of 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; 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; 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) (the "Preliminary Approval Order"), and all prior pleadings and proceedings in this Action, Court-appointed Lead Plaintiff and Class Representative Nizar Sami Ayoub ("Lead Plaintiff"), on behalf of himself and the Class, by and through Lead Counsel Kaplan Fox & Kilsheimer LLP, moves the Court for an order:

(a) pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, granting final approval of the proposed $7,000,000 all-cash Settlement of this Action as fair, reasonable, and adequate;

(b) approving the proposed Plan of Allocation for distribution of the Net Settlement Fund as fair, reasonable, and adequate;

(c) finally certifying the Class for purposes of the Settlement only, and confirming the appointment of Lead Plaintiff as Class Representative and Kaplan Fox & Kilsheimer LLP as Class Counsel;

(d) finding that the notice program implemented pursuant to the Preliminary Approval Order satisfied Rule 23, due process, and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(7);

(e) overruling in their entirety the objections of *pro se* plaintiff and former lead plaintiff Steven B. Christiansen (ECF Nos. 217, 218); and

(f) 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

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