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Class counsel for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

VINH NGUYEN, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

Plaintiff,

v.

RADIENT PHARMACEUTICALS CORPORATION AND DOUGLAS C. MACLELLAN,

Defendants.

CASE No.:CV-11-0406-DOC (MLGx)

CLASS ACTION

LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION

Judge: Hon. David O. Carter
Courtroom: 9D
Hearing Date: April 22, 2014
Hearing Time: 8:30 a.m.

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that, pursuant to Court's Preliminary Approval and Notice Order of January 31, 2014, on April 22, 2014 at 8:30 a.m., or as soon thereafter as counsel may be heard, at the Ronald Reagan Federal Building and U.S. Courthouse, 411 West Fourth Street, Santa Anna, CA 92701, before the Honorable David O. Carter, United States District Judge, Lead Plaintiffs, through their Counsel, will move for final approval of the class action Settlement and the Plan of Allocation of settlement proceeds. Lead Plaintiffs' motion is based on the Memorandum of Law in Support; the Declaration of Laurence M. Rosen in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, and Award of Attorneys' Fees and Reimbursement of Expenses; the Stipulation and Agreement of Settlement dated December 16, 2013; and all other pleadings and matters of record and such additional evidence or argument as may be presented at the hearing. An additional copy of the parties' [Proposed] Final Judgment and Order of Dismissal is filed herewith.

DATED: March 24, 2014

Respectfully submitted,

THE ROSEN LAW FIRM P.A.

/s/ Laurence M. Rosen

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CERTIFICATE OF SERVICE

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of the Rosen Law Firm, P.A. I am over the age of eighteen.

On March 24, 2014, I electronically filed the attached **LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION IN SUPPORT OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on March 24, 2014

/s/ Laurence Rosen
Laurence M. Rosen