

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RON MILLER, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RAYMOND P.
DOLAN, MARK T. GREENQUIST, AND
MICHAEL SWADE,

Defendants.

Case No. 1:18-cv-12344-GAO

**LEAD COUNSEL’S NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS’ FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that April 24, 2024, at 2:00 p.m., Court-appointed lead counsel, Glancy Prongay & Murray LLP and The Rosen Law Firm, P.A. (collectively, “Lead Counsel”), will apply on behalf of all Plaintiffs’ Counsel to the Honorable George A. O’Toole, Jr. at the United States District Court for the District of Massachusetts, John Joseph Moakley United States Courthouse, Courtroom 22, 1 Courthouse Way, Boston, Massachusetts 02210, for entry of an Order awarding attorneys’ fees and reimbursement of Litigation Expenses.¹

Lead Counsel’s motion is based on this Notice of Motion; the concurrently filed Memorandum of Law; the Joint Declaration of Garth A. Spencer and Jacob A. Goldberg in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated July 21, 2023 (“Stipulation”). See ECF No. 122-1.

Expenses; all exhibits thereto; all pleadings and records on file in this Action; and other such matters as the Court may consider. Defendants take no position on this motion.²

Dated: March 20, 2024

Respectfully submitted,

GLANCY PRONGAY & MURRAY LLP

By: /s/ Garth Spencer

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***Co-Lead Counsel for Plaintiffs and the
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***Liaison Counsel for Plaintiffs
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² A proposed order will be submitted with Lead Counsel's reply papers, after the deadline for objections have passed.