

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

MARK WINTER, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

STRONGHOLD DIGITAL MINING, INC.,
GREGORY A. BEARD, RICARDO R. A
LARROUDÉ, WILLIAM B. SPENCE, B.
RILEY SECURITIES, INC., COWEN AND
COMPANY, LLC, TUDOR, PICKERING,
HOLT & CO. SECURITIES, LLC, D.A.
DAVIDSON & CO., COMPASS POINT
RESEARCH & TRADING, LLC, and
NORTHLAND SECURITIES, INC.,

Defendants.

Case No. 1:22-cv-03088-RA

**NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF LITIGATION EXPENSES, AND
AWARD TO LEAD PLAINTIFF**

PLEASE TAKE NOTICE that, pursuant to the Order Granting Motion for Preliminary Approval of Class Action Settlement, on March 7, 2025 before the Honorable Ronnie Abrams, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1506, New York, NY 10007. Lead Plaintiff Allegheny County Employees Retirement System, will and hereby does move the Court for entry of an Order awarding attorneys' fees in the amount of one-third of the four million seven hundred and fifty thousand (\$4.75 million) and the US dollar value of 25 Bitcoins Settlement Amount plus interest, reimbursement of litigation expenses, and an Award to Lead Plaintiff.¹

This motion is based on this Notice of Motion; the Memorandum of Law in Support thereof; the Memorandum of Law in Support thereof; the Declaration of Jonathan Stern in Support of the Motions for: (I) Final Approval of Class Action Settlement and Plan of Allocation; and (II) an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Award to Lead Plaintiff; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

A proposed order is submitted herewith.

Dated: March 7, 2025

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Jonathan Stern

Laurence Rosen

Jonathan Stern

Michael Cohen

Phillip C. Kim

The Rosen Law Firm, P.A.

275 Madison Avenue, 40th Fl.

New York, New York 10016

¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation of Settlement dated November 8, 2024 (Dkt. No. 121).

Lead Counsel for Lead Plaintiff and the Class

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2025, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

//s/ Jonathan Stern

Jonathan Stern

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SECURITIES, INC., COWEN AND COMPANY,
LLC, TUDOR, PICKERING, HOLT & CO.
SECURITIES, LLC, D.A. DAVIDSON & CO.,
COMPASS POINT RESEARCH & TRADING,
LLC, and NORTHLAND SECURITIES, INC.,

Defendants.

Case No. 1:22-cv-03088-RA

**[PROPOSED] ORDER AWARDING ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND AWARD TO PLAINTIFF**

WHEREAS, the Court has granted final approval of the Settlement of the above-referenced class action;

WHEREAS, The Rosen Law Firm, P.A., appointed by the Court as Lead Counsel for purposes of the Settlement, have petitioned the Court for an award of attorneys' fees in compensation for services provided to Lead Plaintiff Allegheny County Employees Retirement System ("Plaintiff") and the Settlement Class along with reimbursement of expenses incurred in connection with prosecuting this action, and an Award to Plaintiff, to be paid out of the Settlement Fund established pursuant to the Settlement;

WHEREAS, capitalized terms used herein having the meanings defined in the Stipulation of Settlement dated November 8, 2024 (the "Stipulation") (Dkt. No. 121); and

WHEREAS, the Court has reviewed the fee application and the supporting materials filed therewith and has heard the presentation made by Lead Counsel during the final approval hearing on April 11, 2025, and due consideration having been had thereon.

NOW, THEREFORE, it is hereby ordered:

1. Lead Counsel is awarded one-third of the Settlement Fund or \$1,583,333 and one third of the cash value of 25 Bitcoin as defined in the Stipulation, as attorneys' fees in this action, together with a proportionate share of the interest earned on the fund, at the same rate as earned by the balance of the fund, from the date of the establishment of the fund to the date of payment.
2. Lead Counsel shall be awarded expenses in the amount of \$122,022.28, with interest, as described above.
3. Lead Plaintiff shall be awarded \$10,000 as reimbursement for its lost time and expenses in connection with its prosecution of the Action.

4. Except as otherwise provided herein, the attorneys' fees, reimbursement of expenses, and Award to Plaintiff shall be paid in the manner and procedure provided for in the Stipulation.

IT IS SO ORDERED.

Dated: _____, 2025

HON. RONNIE ABRAMS
UNITED STATES DISTRICT JUDGE