

**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