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*Lead Counsel for Lead Plaintiffs and the
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**IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY,
PENNSYLVANIA – CIVIL TRIAL DIVISION**

IN RE LIVENT CORPORATION
SECURITIES LITIGATION

CIVIL ACTION

Consolidated Case No. 190501229

**LEAD PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION**

Case ID: 190501229
Control No.: 21031165

1. Pursuant to Pa. R. Civ. P. 1714(a), Lead Plaintiffs Plymouth County Retirement Association (“Plymouth”) and Gary Bizarria (“Bizarria” and, together with Plymouth, “Lead Plaintiffs”), on behalf of themselves and all other members of the Settlement Class, hereby move for entry of the proposed Final Order and Judgment, which will: (i) grant final approval to the proposed settlement of the above-captioned class action (the “Action”), as set forth in the Stipulation and Agreement of Settlement, dated October 27, 2020 (the “Stipulation”);¹ and (ii) approve the proposed plan of allocation for distributing the proceeds of the Settlement to eligible claimants.

2. Lead Plaintiffs will also move, pursuant to Pa. R. Civ. P. 1702, 1708 & 1709, for certification of the Settlement Class and the appointment of Labaton Sucharow LLP as Class Counsel, and Goldman Scarlato & Penny, P.C. as Liaison Counsel, and Plymouth and Bizarria, as Class Representatives.

3. The Court has scheduled a hearing on the motion for April 15, 2021 at 10:00 a.m.

4. The motion is supported by the accompanying memorandum of law and the Declaration of Jonathan Gardner in Support of (I) Lead 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 Payment of Expenses, with annexed exhibits, filed herewith.

5. A proposed Final Order and Judgment, negotiated by the Parties as part of the Settlement, is also submitted herewith.

6. Members of the Settlement Class have until March 25, 2021 to object to the requested relief.

¹ All capitalized terms not otherwise defined herein have the same meanings as set forth in the Stipulation, previously filed with the Court on October 29, 2020.

Dated: March 11, 2021

Respectfully submitted,

GOLDMAN SCARLATO & PENNY, P.C.

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