

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X
NIZAR S. NAYANI, Individually and on Behalf of All Others Similarly Situated,	:
Plaintiff,	:
vs.	:
LIFESTANCE HEALTH GROUP, INC., MICHAEL K. LESTER, J. MICHAEL BRUFF, ROBERT BESSLER, DARREN BLACK, JEFFREY CRISAN, WILLIAM MILLER, JEFFREY RHODES, ERIC SHUEY, KATHERINE WOOD, MORGAN STANLEY & CO. LLC, GOLDMAN SACHS & CO. LLC, J.P. MORGAN SECURITIES LLC, JEFFERIES LLC, TPG CAPITAL BD, LLC, UBS SECURITIES LLC, and WILLIAM BLAIR & COMPANY, L.L.C.,	:
Defendants.	:
	X

Civil Action No. 1:22-cv-06833-JSR

CLASS ACTION

LEAD PLAINTIFF’S NOTICE OF MOTION
AND MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND
APPROVAL OF PLAN OF ALLOCATION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Court-appointed Lead Plaintiff, Nizar S. Nayani, on behalf of the Class, by his undersigned counsel, will move this Court on January 24, 2024, at 4:00 p.m., before the Honorable Jed S. Rakoff at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, or as soon thereafter as the parties can be heard, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of a Final Order and Judgment approving the proposed Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation for the proceeds of the Settlement as fair, reasonable, and adequate.

In support of this motion, Lead Plaintiff submits and is filing herewith: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (ii) the Declaration of Michael G. Capeci in Support of: (1) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §77z-1(a)(4), dated December 20, 2023, with annexed exhibits.

Proposed Orders will be submitted with Lead Plaintiff's reply submission on or before January 17, 2024, after the deadlines for objection and seeking exclusion have passed.

DATED: December 20, 2023

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
MARK T. MILLKEY
MICHAEL G. CAPECI
BRENT E. MITCHELL

s/ Samuel H. Rudman

SAMUEL H. RUDMAN

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
mmillkey@rgrdlaw.com
mcapeci@rgrdlaw.com
bmitchell@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
JONAH H. GOLDSTEIN (admitted *pro hac vice*)
SCOTT H. SAHAM (admitted *pro hac vice*)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
jonahg@rgrdlaw.com
scotts@rgrdlaw.com

Lead Counsel for Lead Plaintiff