

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JET CAPITAL MASTER FUND, L.P.,

Plaintiff,

No. 21-cv-552-jdp

v.

HRG GROUP, INC. ET AL.,

Defendants.

**HRG SUBCLASS LEAD PLAINTIFF’S MOTION FOR
FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

Lead Plaintiff for the HRG Subclass, Jet Capital Master Fund, L.P. (“Jet Capital”), will and does hereby respectfully move this Court on March 18, 2022 at 10:00 a.m. Central Time, under Federal Rule of Civil Procedure 23(e) and this Court’s November 17, 2021 Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement (ECF No. 102):

- i. to enter a Judgment approving the Settlement as fair, reasonable, and adequate; and
- ii. for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

This motion is based on the papers and supporting documents filed herewith and all other papers and proceedings herein, including (i) the Declaration of Lawrence M. Rolnick in Support of Lead Plaintiff’s Motions for (I) Final Approval of Class Action Settlement and Plan of Allocation and (II) Award of Attorneys’ Fees and Litigation Expenses; and (ii) Lead Plaintiff’s memorandum of law in support of this motion.

Lead Plaintiff will submit to the Court a proposed Judgment and an Order granting the requested relief with its reply papers, after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement have expired.

Dated: February 7, 2022

Respectfully submitted,

ROLNICK KRAMER SADIGHI LLP

/s/ Lawrence M. Rolnick _____

Lawrence M. Rolnick (admitted pro hac vice)

Marc B. Kramer (admitted pro hac vice)

Matthew Peller

1251 Avenue of the Americas

New York, New York 10020

Tel. 212-597-2800

*Counsel for Jet Capital
Master Fund, L.P. and the
HRG Subclass*