

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

CITY OF WARREN POLICE AND FIRE  
RETIREMENT SYSTEM, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

WORLD WRESTLING ENTERTAINMENT,  
INC., VINCENT K. McMAHON, GEORGE  
A. BARRIOS, and MICHELLE D. WILSON,

Defendants.

Civil Action No. 1:20-cv-02031-JSR

**NOTICE OF LEAD COUNSEL'S MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND PAYMENT OF EXPENSES**

PLEASE TAKE NOTICE, that Labaton Sucharow LLP, Court-appointed Lead Counsel in the above-captioned class action (the “Action”), will move this Court on June 15, 2021 at 4:00 p.m., either remotely or in person at the Court’s discretion, before the Honorable Jed S. Rakoff, for entry of an Order, pursuant to Rules 23(h) and 54(d) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. §78u-4(a)(4) (“PSLRA”): (i) awarding attorneys’ fees in the amount of 18% of the Settlement Fund; (ii) paying litigation expenses in the amount of \$468,375.08 incurred in prosecuting the Action; and (iii) reimbursing Lead Plaintiff Firefighters’ Pension System of the City of Kansas City, Missouri Trust in the amount of \$6,286.40 for work directly related to its representation of the Settlement Class, as authorized by the PSLRA.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Lead Counsel submits and is filing herewith: (i) the Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses, dated May 11, 2021; and (ii) the Declaration of Carol C. Villegas in Support of Lead Plaintiff’s Motion for Final Approval of Class Action Settlement and Plan of Allocation and Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Expenses, dated May 11, 2021, with annexed exhibits.

A proposed Order will be submitted with Lead Counsel’s reply submission on or before June 8, 2021, after the deadline for objecting has passed.

DATED: May 11, 2021

**LABATON SUCHAROW LLP**

/s/ Carol C. Villegas  
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*Counsel for Lead Plaintiff Firefighters'  
Pension System of the City of Kansas City,  
Missouri Trust and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2021, I caused the foregoing Notice of Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses to be served electronically through the Court's ECF system upon all ECF participants.

*/s/ Carol C. Villegas*  
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CAROL C. VILLEGAS