

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

	X
JOHN A. ERLANDSON and JAMES IAN NORRIS, Individually and on Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	:
	:
vs.	:
	:
TRITERRAS, INC. (f/k/a NETFIN HOLDCO), NETFIN ACQUISITION CORP., TRITERRAS FINTECH PTE. LTD., MVR NETFIN LLC, RICHARD MAURER, MARAT ROSENBERG, VADIM KOMISSAROV, GERALD PASCALE, SRINIVAS KONERU, JAMES H. GROH, ALVIN TAN, JOHN A. GALANI, MATTHEW RICHARDS, VANESSA SLOWEY and KENNETH STRATTON,	:
	:
Defendants.	:
	:
	X

Civil Action No. 7:20-cv-10795-CS

CLASS ACTION

NOTICE OF PLAINTIFFS’ MOTION FOR FINAL APPROVAL OF SETTLEMENT AND APPROVAL OF THE PLAN OF ALLOCATION AND FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES AND AWARDS TO PLAINTIFFS PURSUANT TO 15 U.S.C. §77z-1(a)(4)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that upon: (i) the Declarations of Joseph Russello; (ii) the Declaration of John A. Erlandson; (iii) the Declaration of James Ian Norris; (iv) the Declaration of Mark S. Reich; (v) the Stipulation and Agreement of Settlement, dated April 27, 2022, and the Exhibits annexed thereto; (vi) the Declaration of Ross D. Murray; (vii) the Memorandum of Law in Support of Plaintiffs’ Motion for Final Approval of Settlement and Approval of the Plan of Allocation and for an Award of Attorneys’ Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §77z-1(a)(4); and (viii) all other proceedings herein, Lead Plaintiff John A. Erlandson and plaintiff James Ian Norris (“Plaintiffs”) through counsel, will respectfully move this Court, before

the Honorable Cathy Seibel, United States District Judge for the Southern District of New York, at The Honorable Charles L. Briant Jr. Federal Building and United States Courthouse, 300 Quarropas Street, White Plains, New York on September 6, 2022, at 2:30 p.m., for entry of orders and judgments pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) finally approving the settlement of the captioned litigation; (2) approving the Plan of Allocation; (3) awarding Lead Counsel attorneys' fees and expenses in the litigation; and (4) awarding Plaintiffs compensation for their time and service representing the Class.

Proposed orders will be submitted with Plaintiffs' reply submission on or before August 30, 2022.

DATED: August 2, 2022

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
JOSEPH RUSSELLO
WILLIAM A. MASSA

s/ Joseph Russello

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Additional Counsel for Plaintiff Norris

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 2, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Joseph Russello

JOSEPH RUSSELLO

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Mailing Information for a Case 7:20-cv-10795-CS Ferraiori v. Triterras, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)