

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

IN RE RECONNAISSANCE ENERGY
AFRICA LTD. SECURITIES
LITIGATION

Case No. 1:21-cv-06176-NRM-RML

Honorable Nina R. Morrison

**NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 60), on December 19, 2024 at 10:30 a.m., before the Honorable Nina R. Morrison, Courtroom 6E North, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, Court-appointed lead counsel Glancy Prongay & Murray LLP (“U.S. Lead Counsel”)¹ will and hereby do move the Court for entry of an Order awarding attorneys’ fees in the amount of 33⅓% of the U.S. Settlement Fund (or \$2,336,586.49, plus interest earned at the same rate as the U.S. Settlement Fund) and reimbursement of U.S. Litigation Expenses in the total amount of \$108,332.37 (comprised of \$96,332.37 in out-of-pocket costs incurred by U.S. Lead Counsel, as well as a total of \$12,000 for U.S. Lead Plaintiff, as authorized by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4)).

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Garth A. Spencer in Support of: (I) Lead Plaintiff’s 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 Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Defendants, as defined in the Stipulation, take no position with respect to this motion.

A proposed order will be submitted on reply.

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Global Stipulation and Agreement of Settlement, dated as of February 27, 2024 (“Stipulation”). See ECF No. 55-1.

Dated: November 14, 2024

GLANCY PRONGAY & MURRAY LLP

By: /s/ Garth A. Spencer
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*Counsel for U.S. Lead Plaintiff Robert Partovy and
the Proposed U.S. Settlement Class*

PROOF OF SERVICE

I hereby certify that on this 14th day of November 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/ Garth Spencer
Garth Spencer