

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

DENNIS WILSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LSB INDUSTRIES, INC., JACK E.
GOLSEN, BARRY H. GOLSEN, MARK T.
BEHRMAN, TONY M. SHELBY, and
HAROLD L. RIEKER, JR.

Case No. 1:15-cv-07614-RA-GWG

**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 (“Preliminary Approval Order,” ECF No. 180), on June 28, 2019 at 10:00 a.m., before the Honorable Ronnie Abrams, in Courtroom 1506 of the United States Courthouse, Southern District of New York, 40 Foley Square, New York, NY 10007, Lead Counsel Glancy Prongay & Murray LLP (“Lead Counsel”) will and hereby does move the Court for entry of an Order awarding attorneys’ fees and reimbursement of litigation expenses. This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Casey E. Sadler in Support of (I) Plaintiffs’ 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; the exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Lead Counsel is unaware of any opposition to this motion. Pursuant to the Preliminary Approval Order, any objection to Lead Counsel’s application for an award of attorneys’ fees and reimbursement of litigation expenses must be filed on or before June 7, 2019. To date, no objections have been filed.

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A proposed order granting the requested relief will be submitted with Plaintiffs' reply papers after the deadline for objecting to Lead Counsel's application for an award of attorneys' fees and reimbursement of litigation expenses has passed.

Respectfully submitted,

Dated: May 24, 2019

GLANCY PRONGAY & MURRAY LLP

/s/ Casey E. Sadler _____

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*Counsel for Plaintiffs and Lead Counsel for the
Settlement Class*

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On May 24, 2019, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 24, 2019.

s/ Casey E. Sadler _____
Casey E. Sadler