

PLEASE TAKE NOTICE that Plaintiff, the Commissioners of Public Works of the City of Charleston (d.b.a. “Charleston Water System”) (“Plaintiff”), through Class Counsel Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) and AquaLaw PLC (“AquaLaw”), will move this Court on September 27, 2024, before The Honorable Richard M. Gergel, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of a Final Order and Judgment approving the proposed Settlement as fair, reasonable, and adequate and finally certifying the Settlement Class. Class Counsel will also move this Court for an order awarding the requested attorneys’ fees and expenses.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff submits and is filing herewith: (i) Plaintiff’s Memorandum of Law in Support of: (1) Plaintiffs’ Motion for Final Approval of Class Action Settlement; and (2) Class Counsel’s Application for an Award of Attorneys’ Fees and Expenses; (ii) the Joint Declaration of Vincent M. Serra and F. Paul Calamita in Support of Plaintiff’s Motion for Final Approval of Class Action Settlement and an Award of Attorneys’ Fees and Expenses; (iii) the Declaration of Vincent M. Serra Filed on Behalf of Robbins Geller in Support of Application for Award of Attorneys’ Fees and Expenses; (iv) the Declaration of Frank P. Calamita Filed on Behalf of AquaLaw in Support of Application for Award of Attorneys’ Fees and Expenses; (v) the Declaration of Charleston Water System by Mark Cline; and (vi) the Declaration of Ross D. Murray Regarding Notice Dissemination and Publication.

Plaintiff submits and is filing herewith a Proposed Order.

DATED: August 23, 2024

AQUALAW PLC
F. PAUL CALAMITA (ID #12740)

/s/ F. Paul Calamita

F. PAUL CALAMITA

6 South Fifth Street
Richmond, VA 23219
Telephone: 804/716-9021
804/716-9022 (fax)
paul@aqualaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
VINCENT M. SERRA (admitted *pro hac vice*)
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
vserra@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
FRANCIS P. KARAM (admitted *pro hac vice*)
30 Vesey Street, Suite 200
New York, NY 10007
Telephone: 212/432-5100
fkaram@rgrdlaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing *Motion for Final Approval of Settlement* was filed electronically and notice of the filing will be served on all parties requesting service through the Court's ECF system.

/s/ F. Paul Calamita

F. PAUL CALAMITA