UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

)	CASE NO. 1:17-CV-1580
IN RE CHICAGO BRIDGE & IRON)	
COMPANY N.V. SECURITIES LITIGATION)	Hon. Lorna Schofield
)	
)	

NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Settlement, the Stipulation of Settlement, and exhibits filed herewith, Lead Plaintiff ALSAR Ltd. Partnership and Additional Plaintiffs Iron Workers Local 40, 362, & 417 – Union Security Funds and Iron Workers Local 580 – Joint Funds, on behalf of themselves and all others similarly situated, will respectfully move this Court at such date and time as may be designated by the Honorable Lorna G. Schofield, Courtroom 1106, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for entry of an Order preliminarily approving the proposed Settlement, Plan of Allocation, and proposed form and manner of notice, and scheduling a Settlement Hearing, as is further delineated in the Memorandum of Law filed herewith.

DATED: February 4, 2022 Respectfully submitted,

KAHN SWICK & FOTI, LLC

/s/ Kim E. Miller

Kim E. Miller (KM-6996) J. Ryan Lopatka (*admitted PHV*) 250 Park Avenue, 7th Floor New York, NY 10177 Telephone: (212) 696-3730

Fax: (504) 455-1498

Email: kim.miller@ksfcounsel.com Email: j.lopatka@ksfcounsel.com

-and-

Lewis S. Kahn Craig J. Geraci, Jr. (admitted PHV) 1100 Poydras Street, Suite 3200 New Orleans, LA 70163 Telephone: (504) 455-1400 Fax: (504) 455-1498

Email: lewis.kahn@ksfcounsel.com Email: craig.geraci@ksfcounsel.com

Lead Counsel for Lead Plaintiff ALSAR Ltd. Partnership and Class Counsel

POMERANTZ LLP

Joshua B. Silverman (admitted PHV) Patrick V. Dahlstrom 10 South La Salle Street, Suite 3505 Chicago, IL 60603 Telephone: (312) 377-1181 Email: jbsilverman@pomlaw.com

-and-

Jeremy A. Lieberman 600 Third Avenue New York, NY 10016 Telephone: (212) 661-1100 Email: jalieberman@pomlaw.com

Counsel for Additional Plaintiffs Iron Workers Local 40, 361, & 417 – Union Security Funds and Iron Workers Local 580 – Joint Funds and the Class

CERTIFICATE OF SERVICE

On February 4, 2022, the foregoing document was filed through the Court's ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

<u>/s/ Kim E. Miller</u> Kim E. Miller