

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

RETIREE BENEFIT TRUST OF THE
CITY OF BALTIMORE, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MALIBU BOATS, INC., JACK
SPRINGER, BRUCE BECKMAN, DAVID
BLACK, and WAYNE WILSON,

Defendants.

No. 1:24-cv-03254-LGS

CLASS ACTION

**NOTICE OF LEAD COUNSEL'S 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:

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses ("Motion" or "Fee Motion"), the Declaration of Joshua H. Saltzman in support of: (I) Lead Plaintiff's Unopposed 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; and such other matters and arguments as the Court may consider, Lead Counsel Saxena White P.A. will move this Court, before the Honorable Lorna G. Schofield, at the United States District Court, Southern District of New York, Courtroom 1106 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, on January 27, 2026 at 3:00 P.M., for entry of an order awarding attorneys' fees in the amount of 30% of the Settlement Fund (or

\$2,340,000, plus interest earned at the same rate as the Settlement Fund), reimbursement of Litigation Expenses in the amount of \$115,601.47 (plus interest earned at the same rate as the Settlement Fund); and \$1,500 in reimbursement to Lead Plaintiff of its reasonable costs incurred directly in connection with its representation of the Settlement Class as authorized by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4)).¹

Defendants have informed Lead Plaintiff that they take no position on this Motion. Pursuant to the Court's Preliminary Approval Order, the deadline for members of the Settlement Class to file objections, if any, is January 6, 2026.

Dated: December 23, 2025

Respectfully submitted,

SAXENA WHITE P.A.

By: Joshua H. Saltzman

Steven B. Singer

Joshua H. Saltzman

Sara DiLeo

10 Bank Street, Suite 882

White Plains, NY 10606

Tel.: (914) 437-8551

Fax: (888) 631-3611

ssinger@saxenawhite.com

jsaltzman@saxenawhite.com

sdileo@saxenawhite.com

SAXENA WHITE P.A.

Lester R. Hooker

7777 Glades Road, Suite 300

Boca Raton, Florida 33434

Tel.: (561) 394-3399

Fax: (561) 394-3382

lhooker@saxenawhite.com

Lead Counsel for Lead Plaintiff

¹ All capitalized terms shall have the same meanings ascribed to them in the Stipulation and Agreement of Settlement (ECF No. 61). The proposed order granting the requested relief will be submitted with Lead Plaintiff's reply submission on or before January 20, 2026.

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send a Notice of Electronic Filing to all counsel of record.

Respectfully submitted,

/s/ Joshua H. Saltzman

Joshua H. Saltzman