

**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 MOTION AND UNOPPOSED MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

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 of Lead Plaintiff's Unopposed Motion for Final Approval of Class Action Settlement and Plan of Allocation ("Motion" or "Final Approval 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 Plaintiff, on behalf of itself and the proposed Settlement Class, will move this Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, 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 final approval of: (i) the proposed Settlement of the Action, and (ii) the proposed Plan of Allocation.¹

Defendants have informed Lead Plaintiff that they do not oppose 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,

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Lead Counsel for Lead Plaintiff

¹ Capitalized terms that are not otherwise defined herein have the same meanings ascribed to them in the Stipulation and Agreement of Settlement ("Stipulation"; ECF No. 61). The proposed Judgment and proposed Order Approving Plan of Allocation of Net Settlement Fund 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