

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

IN RE NORTEL NETWORKS CORP.
SECURITIES LITIGATION

This Document Relates To:

ALL ACTIONS

Master File No. 05 MD 1659 (LAP)

ECF Filed

**LEAD PLAINTIFFS' NOTICE OF UNOPPOSED MOTION TO
AMEND DISTRIBUTION PLAN TO PERMIT ADDITIONAL DISTRIBUTIONS**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Stephanie Amin-Giwner Regarding Distribution of the Net Settlement Fund (the "Amin-Giwner Declaration") submitted by the Court-approved Claims Administrator, Epiq Class Action and Claims Solutions, Inc. ("Epiq"), and Lead Plaintiffs' Memorandum in Support of Unopposed Motion to Amend Distribution Plan to Permit Additional Distributions, and pursuant to Federal Rule of Civil Procedure 23(e), Lead Plaintiffs and Class Representatives, the Ontario Teachers' Pension Plan Board and the Department of the Treasury of the State of New Jersey and its Division of Investment, hereby move this Court before the Honorable Loretta A. Preska, United States District Judge, to enter the accompanying order that will amend the Distribution Plan previously approved by this Court. The proposed order would, among other things: (i) direct Epiq to conduct additional distributions of the Net Settlement Fund to Authorized Claimants; (ii) approve Epiq's fees and expenses incurred and estimated to be incurred in the administration of the Settlement; and (iii) approve the recommended plan for any funds remaining in the Net Settlement Fund after the final distribution.

Pursuant to the terms of the Stipulation, this Motion is unopposed by Defendants. As this matter is fully briefed before the Court, a hearing on this motion is not required. Lead Counsel respectfully requests that this motion be decided on the papers. The [Proposed] Order to Amend Distribution Plan is attached hereto as Exhibit 1.

Dated: July 16, 2021

Respectfully Submitted,

**BERNSTEIN LITOWITZ BERGER
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