

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS LOCAL
98 PENSION FUND, on behalf of itself
and all others similarly situated,

Plaintiff,

vs.

DELOITTE & TOUCHE, LLP;
DELOITTE LLP,

Defendants.

Case No. 3:19-cv-3304-JDA

CLASS ACTION

**LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION**

Lead Plaintiff International Brotherhood of Electrical Workers Local 98 Pension Fund ("Lead Plaintiff"), on behalf of itself and the Settlement Class, through counsel, will respectfully move this Court on February 26, 2026, before the Honorable Jacquelyn D. Austin, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for entry of a final Judgment approving the proposed Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation for the proceeds of the Settlement, as fair, reasonable, and adequate.

In support of this motion, Lead Plaintiff submits and is filing herewith the accompanying: (a) Memorandum of Points and Authorities in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (b) Declaration of Laura H. Posner in Support of (i) Lead Plaintiff's 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 Payment of Litigation Expenses, dated January 22, 2026, with annexed exhibits.

A proposed Order will be submitted with Lead Plaintiff's responsive submission, no later than February 19, 2026, after the deadline for objecting and seeking exclusion has passed.

CERTIFICATION PURSUANT TO LOCAL RULE 7.02

Pursuant to Local Rule 7.02, counsel for Lead Plaintiff certifies that, prior to filing the foregoing motion, they conferred with Defendants' counsel, and Defendants do not oppose this motion.

DATED: January 22, 2026

Respectfully submitted,

/s/ William Tinkler

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/s/ Laura H. Posner

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Lead Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I certify that on January 22, 2026, I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF system. A copy of this filing will be sent to the registered participants as identified on the Notice of Electronic Filing.

/s/ William Tinkler

William Tinkler (D.S.C. Bar Number 11794)