

**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 COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND PAYMENT OF LITIGATION EXPENSES**

Court-appointed Lead Counsel, Cohen Milstein Sellers & Toll PLLC ("Lead Counsel"), will respectfully move this Court on February 26, 2026, before the Honorable Jacquelyn D Austin, for an Order, pursuant to Rules 23(h) and 54(d) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(4) ("PSLRA"): (i) awarding attorneys' fees; and (ii) paying Litigation Expenses incurred in prosecuting and resolving the Action, including reimbursing Lead Plaintiff for its reasonable costs and expenses (including lost wages) directly related to its representation of the Settlement Class, pursuant to the PSLRA.

In support of this motion, Lead Counsel submit and are filing herewith the accompanying: (a) Memorandum of Points and Authorities in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses; 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 Counsel's reply 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

TINKLER LAW FIRM LLC
William Tinkler (D.S.C. Bar Number 11794)
PO Box 31813
Charleston, SC 29417-1813
Tel.: (843) 853-5203
Fax.: (843) 261-5647
williamtinkler@tinklerlaw.com

Liaison Counsel for the Proposed Class

/s/ Laura H. Posner

COHEN MILSTEIN SELLERS & TOLL PLLC
Laura H. Posner
88 Pine Street, 14th Floor
New York, NY 10005
Tel.: (212) 220-2925
Fax.: (212) 838-7745
lposner@cohenmilstein.com

Steven J. Toll
Jan E. Messerschmidt
1100 New York Ave. NW, Suite 800
Washington, D.C. 20005
Tel.: (202) 408-4600
Fax.: (202) 408-4699

stoll@cohenmilstein.com
jmesserschmidt@cohenmilstein.com

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)