

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA DIVISION**

IN RE CBL & ASSOCIATES PROPERTIES, INC. SECURITIES LITIGATION	) ) ) ) )	Consolidated Case No. 1:19-CV-181-JRG-CHS
--	-----------------------	--

**NOTICE OF UNOPPOSED MOTION FOR AN AWARD OF  
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,  
AND COMPENSATORY AWARD TO CLASS REPRESENTATIVE**

**PLEASE TAKE NOTICE** that on August 21, 2023 at 1:30 p.m., in Courtroom 400 of the United States District Court for the Eastern District of Tennessee, James H. Quillen United States Courthouse, 220 West Depot Street, Greeneville, Tennessee 37743, Settlement Class Representatives Mark Shaner, Jay B. Scolnick, Ronald T. Amsterdam, Charles D. Hoffman and HoffInvestCo (“Plaintiffs”) will and hereby do move the Court, the Honorable J. Ronnie Greer, for an order awarding Settlement Class Counsel attorneys’ fees in the amount of \$3,500,000, plus interest, reimbursement of \$789,986.47 in expenses, plus interest, and a compensatory award to the four Plaintiffs in the total amount of \$143,000 to be paid from the Settlement Fund. This motion is based upon this notice of motion, the accompanying memorandum of law, the accompanying Joint Declaration of Michael J. Wernke and Michael J. Klein in support of the motion, the exhibits attached thereto, all other pleadings and matters of record, and such additional evidence or argument as may be presented at or before the hearing.

Dated: July 24, 2023

Respectfully Submitted,

/s/ Sarah R. Johnson

Al Holifield (BPR# 015494)  
Sarah R. Johnson (BPR# 030781)  
**HOLIFIELD & JANICH, PLLC**  
11907 Kingston Pike Suite 201  
Knoxville, Tennessee 37934  
Tel: (865) 566-0115  
Fax: (865) 566-0119  
aholifield@holifieldlaw.com  
sjohnson@holifieldlaw.com

John W. Chandler, Jr.  
**THE HAMILTON FIRM**  
2401 Broad Street, Suite 102  
Chattanooga, TN 37408  
Tel: (423) 634-0871  
Fax: (423) 634-0874  
jwc@thehamiltonfirm.com

**Co-Liaison Counsel for Plaintiffs**

Jeffrey S. Abraham (admitted *pro hac vice*)  
Michael J. Klein (admitted *pro hac vice*)  
**ABRAHAM, FRUCHTER &  
TWERSKY, LLP**  
450 Seventh Avenue, 38<sup>th</sup> Floor  
New York, NY 10123  
Tel: (212) 279-5050  
Fax: (212) 279-3655  
jabraham@aftlaw.com  
mklein@aftlaw.com

Jeremy A. Lieberman (admitted *pro hac vice*)  
Michael J. Wernke (admitted *pro hac vice*)  
**POMERANTZ LLP**  
600 Third Avenue, 20th Floor  
New York, New York 10016  
Tel: (212) 661-1100  
Fax: (212) 661-8665  
jalieberman@pomlaw.com  
mjwernke@pomlaw.com

**Class Counsel**

**BRONSTEIN, GEWIRTZ &  
GROSSMAN, LLC**

Peretz Bronstein  
60 East 42nd Street, Suite 4600  
New York, NY 10165  
Tel: (212) 697-6484  
Fax: (212) 697-7296  
peretz@bgandg.com

**Additional Counsel for Jay Scolnick**

**KASKELA LAW LLC**

D. Seamus Kaskela  
18 Campus Boulevard, Suite 100  
Newtown Square, PA 19073  
Tel: (484) 258-1585  
skaskela@kaskelalaw.com

**Additional Counsel for Mark Shaner**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 24, 2023 I caused the foregoing to be electronically filed with the Clerk of Court via CM/ECF, which will send a notice of electronic filing to all registered users.

*By: /s/ Sarah R. Johnson*  
**HOLIFIELD & JANICH, PLLC**  
11907 Kingston Pike Suite 201  
Knoxville, Tennessee 37934  
Tel: (865) 566-0115  
Fax: (865) 566-0119  
sjohnson@holifieldlaw.com

*Co-Liaison Counsel for Plaintiffs*