

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE HORSEHEAD HOLDING
CORP. SECURITIES LITIGATION

Civil. Action No. 16-292-LPS-CJB
Consolidated
CLASS ACTION

**MOTION FOR (I) FINAL APPROVAL OF SETTLEMENT
AND (II) PLAN OF ALLOCATION**

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court’s Preliminary Approval Order [ECF No. 187], Lead Plaintiffs Dyson Capital Management Ltd. and Raymond Cook (collectively “Lead Plaintiffs”), and Additional Plaintiff Ross O. Swimmer (with Lead Plaintiffs, “Class Plaintiffs”), respectfully move this Court for final approval of (i) the proposed Settlement between Class Plaintiffs, on behalf of the Class, and defendants James M. Hensler and Robert D. Scherich (collectively “Defendants”); and (ii) the Plan of Allocation.

This motion is made based upon the accompanying memorandum of law and the Declaration of Gregory Linkh and its attached exhibits, submitted herewith.

A proposed Judgment and Order granting the requested relief will be submitted with Class Plaintiffs’ reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: April 30, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2021, I caused true and accurate copies of the foregoing papers to be served upon all counsel of record via CM/ECF.

/s/ Sidney S. Liebesman
Sidney S. Liebesman (DE #3702)