

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re TALKSPACE, INC. SECURITIES	:	Civil Action No. 1:22-cv-00163-PGG
LITIGATION	:	
	:	<u>CLASS ACTION</u>
_____	X	
		PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PLAN OF ALLOCATION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs Steven Jacob Greenblatt, Montague Street LP, Greenblatt Family Investments LLC, William Greenblatt, Judith Greenblatt, the Brandon T. Greenblatt Trust, the Maggie S. Greenblatt 2015 Trust, the Steven Jacob Greenblatt 2015 Trust and Ivan M. Baron (“Plaintiffs”), on behalf of the Class, by their undersigned counsel, will move this Court on October 30, 2023, at 10:00 a.m., before the Honorable Paul G. Gardephe at the Thurgood Marshall United States Courthouse, Courtroom 705, 40 Foley Square, New York, New York 10007, or as soon thereafter as the parties can be heard, for the entry of orders and a judgment, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) for the purposes of settlement only, certifying the Class, certifying Plaintiffs as Class Representatives and appointing Lead Counsel as Class Counsel; (ii) granting final approval of the proposed Settlement between Plaintiffs and Defendants as set forth in the Stipulation of Settlement, previously filed with the Court (ECF 84); (iii) approving the proposed Plan of Allocation; and (iv) for such further relief as is just.<sup>1</sup>

<sup>1</sup> Unless stated otherwise, all capitalized terms used herein have the meanings set forth and defined in the Stipulation of Settlement.

In support of this motion, Plaintiffs rely on: (i) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; (ii) the Joint Declaration of Lawrence M. Rolnick and Evan J. Kaufman in Support of: (1) Plaintiffs' Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declarations of Plaintiffs; (iv) the Declaration of Ross D. Murray; (v) the Stipulation of Settlement; and (vi) all other proceedings herein.

Proposed orders will be submitted with Plaintiffs' reply submission on or before October 23, 2023.

DATED: September 25, 2023

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 25, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Evan J. Kaufman

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## Mailing Information for a Case 1:22-cv-00163-PGG Baron v. Talkspace, Inc. et al

### Electronic Mail Notice List

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