

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re TALKSPACE, INC. SECURITIES : X
LITIGATION : Civil Action No. 1:22-cv-00163-PGG
: :
: CLASS ACTION
: X

LEAD COUNSEL’S NOTICE OF MOTION
AND MOTION FOR AN AWARD OF
ATTORNEYS’ FEES AND EXPENSES AND
AWARDS TO PLAINTIFFS PURSUANT TO
15 U.S.C. §78u-4(a)(4)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead 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 an entry of order, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (i) awarding attorneys’ fees; (ii) paying litigation expenses incurred in prosecuting the Actions; and (iii) granting awards to Plaintiffs.¹

This motion is based on: (i) the Memorandum of Law in Support of 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); (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

¹ Unless stated otherwise, all capitalized terms used herein have the meanings set forth and defined in the Stipulation of Settlement (ECF 84).

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 Declarations of Plaintiffs' Counsel; (vi) the Stipulation of Settlement; and (vii) all other proceedings herein.

A proposed order will be submitted with Plaintiffs' reply submission on or before October 23, 2023.

DATED: September 25, 2023

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
EVAN J. KAUFMAN
WILLIAM A. MASSA

s/ Evan J. Kaufman

EVAN J. KAUFMAN

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
drosefeld@rgrdlaw.com
ekaufman@rgrdlaw.com
wmassa@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
elleng@rgrdlaw.com

ROLNICK KRAMER SADIGHI LLP
LAWRENCE M. ROLNICK
MARC B. KRAMER
MATTHEW PELLER
1251 Avenue of the Americas
New York, NY 10020
Telephone: 212/597-2838
lrolnick@rksllp.com
shecht@rksllp.com
mpeller@rksllp.com

Lead Counsel for Lead Plaintiffs

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

EVAN J. KAUFMAN

ROBBINS GELLER RUDMAN
& DOWD LLP
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

Email: ekaufman@rgrdlaw.com

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

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Adam M. Apton**
aapton@zlk.com,ecf@zlk.com,jtash@zlk.com
- **Mark Stewart Cohen**
mcohen@cohengresser.com,managingclerksoffice@cohengresser.com,Mark-Cohen-1234@ecf.pacerpro.com,autodocket@cohengresser.com
- **Scott Alexander Edelman**
sedelman@milbank.com
- **Richard William Gonnello**
rgonnello@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Evan Jay Kaufman**
ekaufman@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,ekaufman@ecf.courtdrive.com
- **Phillip C. Kim**
pkim@rosenlegal.com,pkrosenlaw@ecf.courtdrive.com
- **Jeremy Alan Lieberman**
jalieberman@pomlaw.com,mtjohnston@pomlaw.com,ahood@pomlaw.com,disaacson@pomlaw.com,ashmatkova@pomlaw.com,abarbosa@pomlaw.com
- **Gregory Bradley Linkh**
glinkh@glancylaw.com,info@glancylaw.com,greg-linkh-2000@ecf.pacerpro.com
- **David Lisner**
dlisner@cohengresser.com,managingclerksoffice@cohengresser.com,autodocket@cohengresser.com
- **Allison Samantha Markowitz**
amarkowitz@milbank.com,AutoDocketECF@milbank.com,allison-markowitz-1810@ecf.pacerpro.com
- **William A. Massa**
wmassa@rgrdlaw.com
- **Matthew Alain Peller**
mpeller@rksllp.com,cdeleon@rksllp.com
- **Bradley Philip Pollina**
brad@bflawoffice.com
- **Lawrence M. Rolnick**
lrolnick@rksllp.com,mhampson@rksllp.com,cdeleon@rksllp.com,docket@rksllp.com,clafferriere@rksllp.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com,drosenfeld@ecf.courtdrive.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Jed Mastren Schwartz**
jschwartz@milbank.com,jed-schwartz-8050@ecf.pacerpro.com,ggreen@milbank.com,AutoDocketECF@milbank.com
- **Ellen Anne Gusikoff Stewart**
elleng@rgrdlaw.com
- **Michael Saul Weinstein**
mweinstein@coleschotz.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)