

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GRAB HOLDINGS LIMITED
SECURITIES LITIGATION

Case No. 1:22-cv-02189-JLR

**LEAD PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF
SETTLEMENT AND PLAN OF ALLOCATION**

Pursuant to Federal Rule of Civil Procedure 23(e), Lead Plaintiffs Si Fan, Amit Batra, and SLG Cloudbank Holdings, LLC (“Lead Plaintiffs”) hereby move this Court for an Order granting final approval of (1) the proposed Settlement resolving this Action for the payment of \$80.0 million in cash for the benefit of the Settlement Class in consideration for fully resolving all claims alleged in this Action, and (2) the proposed Plan of Allocation of the proceeds of the Settlement.¹

As set forth more fully in the accompanying Memorandum of Law, and the Joint Declaration of Shannon L. Hopkins and Brian P. O’Connell in Support of (I) Lead Plaintiffs’ Unopposed Motion for Final Approval of Settlement and Plan of Allocation, and (II) Co-Lead Counsel’s Motion for Attorneys’ Fees, Reimbursement of Litigation Expenses, and Award to Lead Plaintiffs filed herewith, the Settlement, including the Plan of Allocation for distribution of the Net Settlement Fund to members of the Settlement Class, satisfies each of the legal requirements for final approval under Rule 23(e) of the Federal Rules of Civil Procedure and the precedent of this Circuit, and the proposed Settlement Class meets all of the requirements for certification under Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure. Lead Plaintiffs have conferred with Defendants, who do not oppose the relief requested in this Motion.

Dated: April 10, 2025

Respectfully submitted,

LEVI & KORSINSKY, LLP

/s/ Shannon L. Hopkins
 Shannon L. Hopkins
 Gregory M. Potrepka
 Morgan M. Embleton (*pro hac vice*)
 1111 Summer Street, Suite 403
 Stamford, CT 06905

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation and Agreement of Settlement (“Stipulation”) (ECF No. 140-1). Co-Lead Counsel are also filing concurrently a Motion for Attorneys’ Fees, Reimbursement of Litigation Expenses, and Award to Lead Plaintiffs, and a Memorandum of Law in support thereof.

Tel: (203) 992-4523
shopkins@zlk.com
gpotrepka@zlk.com
membleton@zlk.com

Co-Lead Counsel for Lead Plaintiffs

POMERANTZ LLP

/s/ Brian P. O'Connell
Joshua B. Silverman
Brian P. O'Connell
10 South La Salle Street, Suite 3505
Chicago, Illinois 60603
Tel.: (312) 377-1181
Fax: (312) 377-1184
jbsilverman@pomlaw.com
boconnell@pomlaw.com

Jeremy A. Leiberman
J. Alexander Hood II
600 Third Avenue, 20th Floor
New York, New York 10016
Tel: (212) 661-1100
Fax: (212) 661-8665
jalieberman@pomlaw.com
ahood@pomlaw.com

Co-Lead Counsel for Lead Plaintiffs

**BRONSTEIN, GEWIRTZ &
GROSSMAN, LLC**

Eitan Kimelman
60 E 42nd Street, Suite 4600
New York, New York 10165
Tel.: (212) 697-6484
Fax: (212) 697-7296
eitank@bandg.com

Additional Counsel for Lead Plaintiffs