

KESSLER TOPAZ MELTZER
& CHECK, LLP
ELI R. GREENSTEIN (*Pro Hac Vice*)
JENNIFER L. JOOST (*Pro Hac Vice*)
PAUL A. BREUCOP (*Pro Hac Vice*)
One Sansome Street, Suite 1850
San Francisco, CA 94104
Telephone: 415/400-3000
415/400-3001 (fax)
– and –
GREGORY M. CASTALDO (*Pro Hac Vice*)
280 King of Prussia Rd.
Radnor, PA 19087
Telephone: 610/667-7706
610/667-7056 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
ARTHUR C. LEAHY (*Pro Hac Vice*)
ELLEN GUSIKOFF STEWART (*Pro Hac Vice*)
BRIAN O. O’MARA (Nevada Bar #8214)
RYAN A. LLORENS (*Pro Hac Vice*)
MATTHEW I. ALPERT (*Pro Hac Vice*)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

NIX PATTERSON & ROACH, LLP
BRADLEY E. BECKWORTH (*Pro Hac Vice*)
JEFFREY J. ANGELOVICH (*Pro Hac Vice*)
SUSAN WHATLEY (*Pro Hac Vice*)
LISA P. BALDWIN (*Pro Hac Vice*)
205 Linda Drive
Daingerfield, TX 75638
Telephone: 903/645-7333
903/645-4415 (fax)

Lead Counsel for Plaintiffs
[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

In re MGM MIRAGE SECURITIES
LITIGATION

This Document Relates To:

ALL ACTIONS.

) No. 2:09-cv-01558-GMN-VCF
)
) CLASS ACTION
)
) LEAD PLAINTIFFS’ NOTICE OF MOTION
) AND MOTION FOR (1) FINAL APPROVAL
) OF CLASS ACTION SETTLEMENT; (2)
) APPROVAL OF PLAN OF ALLOCATION
) OF SETTLEMENT PROCEEDS; AND (3)
) AN AWARD OF ATTORNEYS’ FEES AND
) EXPENSES TO LEAD COUNSEL AND
) AWARDS TO LEAD PLAINTIFFS
) PURSUANT TO 15 U.S.C. §78u-4(a)(4)

DATE: December 15, 2015
TIME: 9:00 a.m.
CTRM: The Honorable Gloria M. Navarro

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that pursuant to this Court's Order dated September 11, 2015, on December 15, 2015, at 9:00 a.m., in the Courtroom of the Honorable Gloria M. Navarro, United States District Judge, District of Nevada, at the Lloyd D. George U.S. Courthouse, 333 Las Vegas Boulevard South, Las Vegas, Nevada 89101, Lead Plaintiffs Arkansas Teacher Retirement System, Philadelphia Board of Pensions and Retirement, Luzerne County Retirement System, and Stichting Pensioenfond Metaal en Techniek (collectively, "Lead Plaintiffs") will and hereby respectfully move the Court to enter a judgment and orders (1) granting final approval of the proposed settlement of this litigation; (2) approving the proposed plan for allocating the net settlement proceeds; and (3) awarding Lead Counsel attorneys' fees and expenses and Lead Plaintiffs' expenses. In support of this motion, Lead Plaintiffs submit this notice, the memoranda of points and authorities in support thereof, the declarations filed in support thereof, the pleadings and files herein and such other written or oral argument as may be presented to the Court.

A proposed judgment and orders will be submitted with Lead Plaintiffs' reply submission after the deadline for objecting and requesting exclusion from the Class have passed.

DATED: November 3, 2015

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
ARTHUR C. LEAHY
ELLEN GUSIKOFF STEWART
BRIAN O. O'MARA (Nevada Bar #8214)
RYAN A. LLORENS
MATTHEW I. ALPERT
NATHAN W. BEAR
IVY T. NGO

s/ Brian O. O'Mara

BRIAN O. O'MARA

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

NIX PATTERSON & ROACH, LLP
BRADLEY E. BECKWORTH
JEFFREY J. ANGELOVICH
SUSAN WHATLEY
LISA P. BALDWIN
JOHN HULL
TREY DUCK

s/ Bradley E. Beckworth

BRADLEY E. BECKWORTH

205 Linda Drive
Daingerfield, TX 75638
Telephone: 903/645-7333
903/645-4415 (fax)

KESSLER TOPAZ MELTZER
& CHECK, LLP
ELI R. GREENSTEIN
JENNIFER L. JOOST
PAUL A. BREUCOP

s/ Eli R. Greenstein

ELI R. GREENSTEIN

One Sansome Street, Suite 1850
San Francisco, CA 94104
Telephone: 415/400-3000
415/400-3001 (fax)

Lead Counsel for Plaintiffs

ALDRICH LAW FIRM, LTD.
JOHN P. ALDRICH (Nevada Bar #6877)
1601 South Rainbow Blvd., Suite 160
Las Vegas, NV 89146
Telephone: 702/853-5490
702/227-1975 (fax)

LAW OFFICES OF CURTIS B. COULTER, P.C.
CURTIS B. COULTER (Nevada Bar #3034)
403 Hill Street
Reno, NV 89501
Telephone: 775/324-3380
775/342-3381 (fax)

Liaison Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2015, 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 e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 3, 2015.

s/ Brian O. O'Mara

BRIAN O. O'MARA

ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)

E-mail: BOMara@rgrdlaw.com

Mailing Information for a Case 2:09-cv-01558-GMN-VCF

Electronic Mail Notice List

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

- **Ramzi Abadou**
Ramzi.Abadou@ksfcounsel.com,yjayasuriya@ktmc.com,knguyen@ktmc.com,dcheck@ktmc.com,kweiland@ktmc.com,arobles@ktmc.com
- **Jeffrey Simon Abraham**
jabraham@aftlaw.com
- **John P. Aldrich**
jaldrich@johnaldrichlawfirm.com,traci@johnaldrichlawfirm.com,eleanor@johnaldrichlawfirm.com,sorme@johnaldrichlawfirm.com
- **Matthew I Alpert**
malpert@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Jeffrey J Angelovich**
jangelovich@npraustin.com
- **Leland E. Backus**
gbackus@backuslaw.com,efile@backuslaw.com
- **Lisa Baldwin**
lbaldwin@npraustin.com
- **Ze'eva K Banks**
zkbanks@chitwoodlaw.com,KGore@chitwoodlaw.com,LSmith@chitwoodlaw.com
- **Nathan W. Bear**
nbear@rgrdlaw.com
- **Bradley E Beckworth**
shelley@nixlawfirm.com,andreab@nixlawfirm.com
- **Todd L. Bice**
lit@pisanellibice.com,Larry.Polon@mto.com,Laurie.Thoms@mto.com,smt@pisanellibice.com
- **Samuel Boyd**
samuel.boyd@mto.com,monica.walker@mto.com
- **Paul A Breucop**
pbreucop@ktmc.com,jhouston@ktmc.com,yjayasuriya@ktmc.com
- **Brad Brian**
brad.brian@mto.com
- **William K Briggs**
wbriggs@irell.com
- **Darren J. Check**
dcheck@ktmc.com,namjed@ktmc.com
- **Curtis B. Coulter**
ccoulter@coulterlaw.net,julie@coulterlaw.net,irene@coulterlaw.net
- **Charles C. Diaz**
diazlaw@sbcglobal.net
- **Lloyd Nolan Duck , III**
treynuck@nixlawfirm.com
- **Charles Elder**
celder@irell.com
- **Jack G Fruchter**
jfruchter@aftlaw.com
- **George M Garvey**
george.garvey@mto.com,samantha.booth@mto.com,glenda.hunt@mto.com
- **Ross C Goodman**
ross@goodmanlawgroup.com,ron@ronaldrichards.com,tiffanie@goodmanlawgroup.com

- **John Goodson**
jgoodson@kglawfirm.com,cheffin@kglawfirm.com
- **Eli R Greenstein**
egreenstein@ktmc.com,jhouston@ktmc.com,rmathcook@ktmc.com,yjayasuriya@ktmc.com
- **Ellen Gusikoff Stewart**
elleng@rgrdlaw.com
- **Keith R.D. Hamilton , II**
keith.hamilton@mto.com
- **Sean M. Handler**
shandler@ktmc.com
- **Griffith H Hayes**
mtuer@cookseylaw.com,hrainey@cookseylaw.com
- **John C. Hull**
johnhull@nixlawfirm.com
- **Jennifer Joost**
jjoost@ktmc.com,amarshall@ktmc.com,jhouston@ktmc.com,jenck@ktmc.com,yjayasuriya@ktmc.com
- **Stacey M. Kaplan**
skaplan@ktmc.com,amarshall@ktmc.com,jhouston@ktmc.com,yjayasuriya@ktmc.com,kweiland@ktmc.com,cbucciarelli@ktmc.com
- **Matt Keil**
mkeil@kglawfirm.com
- **Robert W. Killorin**
rkillorin@chitwoodlaw.com
- **Arthur C. Leahy**
artl@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Akke Levin**
al@morrislawgroup.com,vln@morrislawgroup.com
- **Ryan A. Llorens**
ryanl@rgrdlaw.com
- **William A. S. Magrath , II**
wmagrath@mcdonaldcarano.com,kmorris@mcdonaldcarano.com
- **Benjamin J Maro**
benjamin.maro@mto.com,laurie.thoms@mto.com,larry.polon@mto.com
- **Steve L. Morris**
sm@morrislawgroup.com,paf@morrislawgroup.com
- **Andrew R. Muehlbauer**
andrew@mlolegal.com,witty@mlolegal.com,hrainey@cookseylaw.com
- **Christopher Nelson**
cnelson@btkmc.com
- **Ivy T. Ngo**
ingo@rgrdlaw.com
- **Brian O. O'Mara**
bomara@rgrdlaw.com,jillk@rgrdlaw.com,risac@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Margaret Claire O'Sullivan**
cosullivan@irell.com
- **George F. Ogilvie , III**
gogilvie@mcdonaldcarano.com,kbarrett@mcdonaldcarano.com
- **Margaret Onasch**
monasch@ktmc.com
- **Erik Peterson**
epeterson@ktmc.com

- **Gregory D. Phillips**
Jennifer.Lawlor@mto.com
- **Jarrold L. Rickard**
jlr@pisanellibice.com,lit@pisanellibice.com,smt@pisanellibice.com
- **Darren J. Robbins**
e_file_sd@rgrdlaw.com
- **David Rosenfeld**
drosenfeld@rgrdlaw.com
- **Matthew David Rowen**
matthew.rowen@mto.com
- **Meghan Alexandra Royal**
aroyal@rgrdlaw.com
- **Samuel H. Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Joseph Russello**
jrussello@csgrr.com
- **M Nelson Segel**
nelson@nelsonsegel.com,diana@nelsonsegellaw.com
- **David Siegel**
dsiegel@irell.com,rgrazziani@irell.com,jmanzano@irell.com
- **Rosa Solis-Rainey**
rsr@morrislawgroup.com,fmi@morrislawgroup.com
- **Glenn K Vanzura**
gvanzura@irell.com
- **Susan Whatley**
susanwhatley@nixlawfirm.com,lbaldwin@npraustin.com
- **James M Wilson**
jwilson@chitwoodlaw.com
- **Amanda C Yen**
ayen@mcdonalddcarano.com,dsampson@mcdonalddcarano.com,mwade@mcwlaw.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)