

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE LITERARY WORKS IN ELECTRONIC)	
DATABASES COPYRIGHT LITIGATION)	MDL No. 1379
)	

**NOTICE OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF REVISED SETTLEMENT**

PLEASE TAKE NOTICE that on June 10, 2014, at 10:00 a.m. or as soon thereafter as counsel can be heard, the undersigned counsel will bring a motion before the Honorable George B. Daniels, United States District Judge, in Courtroom 11A of the Daniel Patrick Moynihan United States Courthouse, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for final approval of the proposed revised class settlement in the above-captioned action. In support of this application, counsel rely on the following accompanying documents and all other files and records in this action:

- (i) Memorandum Of Law In Support Of Plaintiffs' Motion For Final Approval Of Revised Settlement;
- (ii) Declaration Of Jose C. Fraga Regarding (A) Mailing Of The Notice; (B) Implementation Of Telephone Hotline And Official Settlement Website; And (C) Requests For Exclusion;
- (iii) Declaration Of Lael D. Dowd Concerning Implementation Of Class Notification Program;
- (iv) Declaration Of Perry S. Carbone On Behalf Of The Garden City Group, Inc. Regarding Certain Class Members;

(v) Declaration Of Charles Chalmers In Support Of Final Approval Of Revised Settlement.

Dated: June 3, 2014

Respectfully submitted,

/s/ A. J. De Bartolomeo

Michael J. Boni
Boni & Zack LLC
15 St. Asaphs Road
Bala Cynwyd, PA 19004

A. J. De Bartolomeo
Girard Gibbs LLP
601 California St., 14th Floor
San Francisco, CA 94108

Diane S. Rice
Hosie Rice LLP
Transamerica Pyramid, 34th Floor
600 Montgomery Street
San Francisco, CA 94111

Gary Fergus
Fergus, A Law Office
595 Market Street, Suite 2430
San Francisco, CA 94105

Category A/B Counsel

Charles Chalmers
Allegiance Litigation
769 Center Boulevard, Suite 134
Fairfax, CA 94930

Category C Counsel