

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(COLUMBIA DIVISION)

*In re SCANA Corporation Securities
Litigation*

Civil Action No. 3:17-CV-2616-MBS

**LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND PAYMENT OF LITIGATION EXPENSES**

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*Co-Lead Counsel for Lead Plaintiffs West Virginia IMB and Blue Sky
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Court-appointed Lead Counsel, Bernstein Litowitz Berger & Grossmann LLP and Labaton Sucharow LLP (“Lead Counsel”), will respectfully move this Court on June 17, 2020 at 2:00 p.m., before the Honorable Margaret B. Seymour, for an Order, pursuant to Rules 23(h) and 54(d) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4(a)(4) (“PSLRA”): (i) awarding attorneys’ fees; (ii) paying Litigation Expenses incurred in prosecuting and resolving the Action; and (iii) reimbursing Lead Plaintiffs for their reasonable costs and expenses (including lost wages) directly related to their representation of the Settlement Class, pursuant to the PSLRA.¹

In support of this motion, Lead Counsel submit and are filing herewith the accompanying: (i) Memorandum of Points and Authorities in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses; and (ii) Joint Declaration of John C. Browne and James W. Johnson in Support of (I) Lead Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses, dated April 22, 2020, with annexed exhibits.

A proposed Order will be submitted with Lead Counsel’s reply submission, no later than June 10, 2020, after the deadline for objecting has passed.

¹ On April 21, 2020, the Parties filed a Joint Motion to Conduct Final Settlement Hearing by Telephone (Dkt. 226), citing several instances where courts have granted such relief. Just yesterday, another court, in the Southern District of New York, granted a similar motion seeking to conduct a final settlement hearing by telephone. *See In re Vale, S.A. Sec. Litig.*, Case No. 15 Civ. 9539 (GSW) (S.D.N.Y.), “Order Confirming That Final Settlement Hearing Scheduled for June 10, 2020 Will Be Conducted By Telephone,” Dkt. No. 196 (S.D.N.Y. Apr. 21, 2020).

CERTIFICATION PURSUANT TO LOCAL RULE 7.02

Pursuant to Local Rule 7.02, counsel for Lead Plaintiffs certify that, prior to filing the foregoing motion, they conferred with Defendants' counsel. SCANA consents to the relief sought in the motion and the other Defendants have not responded.

DATED: April 22, 2020

/s/ Marlon E. Kimpson

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 22, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Marlon E. Kimpson

MARLON E. KIMPSON (D.S.C. Bar No. 7487)