

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ALI KARIMI, Individually and On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT, JOHN
CRYAN, AND CHRISTIAN SEWING,

Defendants.

Case No. 1:22-cv-02854 (JSR)

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Yun Wang (“Lead Plaintiff”) and Named Plaintiff Ali Karimi (“Named Plaintiff,” and, collectively, “Plaintiffs”), through Plaintiffs’ Counsel, on behalf of themselves and the Settlement Class (as defined below), hereby move this Court under Federal Rule of Civil Procedure 23 for the entry of an order (the “Proposed Order”), substantially in the form attached as Exhibit A to the Stipulation of Settlement dated September 23, 2022 (the “Settlement Stipulation”):

- (1) preliminarily approving the proposed settlement as set forth in the Settlement Stipulation, attached as Exhibit 1 to the Declaration of Emma Gilmore in support of this Motion (“Gilmore Declaration”), resolving this Action against all Defendants in exchange for the payment of \$26.25 million for the benefit of the Settlement Class;
- (2) preliminarily certifying a class (the “Settlement Class”), for settlement purposes only, of all persons or entities that purchased or otherwise acquired the common

stock of Deutsche Bank Aktiengesellschaft, between March 14, 2017, and September 18, 2020, both dates inclusive, on (i) any stock exchanges located in the United States, (ii) on any alternative trading systems located in the United States, or (iii) pursuant to other domestic transactions, and who were allegedly damaged thereby (subject to certain exclusions set forth in the Settlement Stipulation) and Plaintiffs as Class Representative on behalf of the Settlement Class;

- (3) appointing AB Data Ltd. as Claims Administrator;
- (4) approving the form and manner of disseminating notice to the Settlement Class;
- (5) scheduling a hearing to consider final approval of the Settlement and an award of attorneys' fees and expenses and a compensatory award to Plaintiffs; and
- (6) setting deadlines for the dissemination of notice, the submission of proofs of claim and requests for exclusion, the filing of objections, and the filing of Plaintiffs' Counsel's motion for final approval of the Settlement and applications for attorneys' fees and expenses and a compensatory award to Plaintiffs.

Plaintiffs base this Unopposed Motion on this Notice of Motion, the Gilmore Declaration, the Settlement Stipulation and all exhibits attached thereto, and Plaintiffs' supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

The Defendants do not oppose the relief Plaintiffs seek. Accordingly, Plaintiffs requests that the Court enter the Proposed Order.

Dated: September 23, 2022

Respectfully submitted,

/s/ Emma Gilmore
Jeremy A. Lieberman

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*Additional Counsel for Plaintiffs and for the
Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of September 2022, a true and correct copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Emma Gilmore