

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GREGORY BOUTCHARD and SYNOVA
ASSET MANAGEMENT, LLC, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

KAMALDEEP GANDHI, YUCHUN MAO
a/k/a BRUCE MAO, KRISHNA MOHAN,
TOWER RESEARCH CAPITAL LLC, and
JOHN DOE NOS. 1-5,

Defendants.

Case No. 1:18-cv-07041

Hon. John J. Tharp, Jr.

**LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
PAYMENT OF LITIGATION EXPENSES,
AND CLASS PLAINTIFFS' REQUEST FOR AN INCENTIVE AWARD**

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 23(e) and (h) of the Federal Rules of Civil Procedure, will respectfully move this Court on Friday, July 30, 2021 at 10:00 a.m., before the Honorable John J. Tharp, Jr., United States District Judge, at the United States District Court for the Northern District of Illinois, Eastern Division, Everett McKinley Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, for entry of the [Proposed] Order Awarding Attorneys' Fees, Payment of Litigation Expenses, and an Incentive Award to Class Plaintiffs. In support of their motion, Plaintiffs rely on (i) Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, and Class Plaintiffs' Request for an Incentive Award; (ii) the Declaration of Vincent Briganti in Support of (A) Class Plaintiffs' Motion for Final Approval of Class Action Settlement with Tower Research LLC; and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, dated May 27, 2021; (iii) the Declaration of Vincent Briganti on Behalf of

Lowey Dannenberg, P.C. in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, dated May 27, 2021; (iv) the Declaration of Anthony F. Fata on Behalf of Cafferty Clobes Meriwether & Sprengel LLP in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses dated May 27, 2021 (v) the Declaration of Gregory Boutchard dated May 27, 2021; (vi) the Declaration of Jeffrey Wagner dated May 27, 2021; and (v) the record herein.

Dated: May 27, 2021
White Plains, New York

LOWEY DANNENBERG, P.C.

/s/ Vincent Briganti
Vincent Briganti
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Additional Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 27, 2021, I electronically filed the foregoing motion and supporting papers with the Clerk of the Court using the CM/ECF system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this notice as service of this document by electronic means.

Dated: May 27, 2021

Vincent Briganti
Vincent Briganti