

**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.

**CLASS PLAINTIFFS' MOTION
FOR ENTRY OF AN ORDER APPROVING DISTRIBUTION OF THE NET
SETTLEMENT FUND TO AUTHORIZED CLAIMANTS**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Jack Ewashko in Support of Class Plaintiffs’ Motion for Entry of an Order Approving Distribution of the Net Settlement Fund to Authorized Claimants and the record herein, Plaintiffs Gregory Boutchard and Synova Asset Management, LLC (“Class Plaintiffs”), by and through their undersigned counsel, will move this Court, before the Honorable John J. Tharp, Jr., United States District Judge, at the United States District Court, Northern District of Illinois, Room 1419 of the Everett McKinley Dirksen Building, 219 Dearborn Street, Chicago, Illinois, on such a date and time as the Court may direct, for an order approving the administrative recommendations of the Court-approved Settlement Administrator, A.B. Data, Ltd., and the distribution of the Net Settlement Fund from the Settlement with Tower Research Capital, LLC, and granting such other relief set forth in the proposed order filed herewith.

Dated: April 3, 2024

Respectfully submitted,

LOWEY DANNENBERG, P.C.

/s/ Vincent Briganti

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