

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

ATG FUND II LLC, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

VPC IMPACT ACQUISITION HOLDINGS
SPONSOR II, LLC, BRENDAN CARROLL,
GORDON WATSON, CARLY ALTIERI,
JOHN MARTIN, JOSEPH LIEBERMAN,
and KAI SCHMITZ,

Defendants,

-and-

VPC IMPACT ACQUISITION HOLDINGS
II,

Nominal Defendant.

Civil Action No. 23-1978-JSR

**NOTICE OF MOTION FOR ATTORNEYS' FEES,
LITIGATION EXPENSES, AND INCENTIVE AWARD**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rules of Civil Procedure 23(e)(1) and 23.1(c) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated June 18, 2024 (ECF 28), Lead Plaintiff ATG Fund II LLC ("Lead Plaintiff"), on behalf of itself and the Settlement Class, and Lead Counsel Morris Kandinov LLP ("Lead Counsel") will and do hereby move this Court, before the Honorable Jed S. Rakoff, on September 26, 2024 at 4:00 p.m., for entry of an Order awarding attorneys' fees, litigation expenses, and an incentive award.

This motion is based on (i) the Declaration of Aaron T. Morris in Support of: (A) Motion for Final Approval of Settlement, Class Certification, and Plan of Allocation; and (B) Motion for Attorneys' Fees, Litigation Expenses, and Incentive Award; (ii) the Declaration of Gabi Gliksberg in Support of: (A) Motion for Final Approval of Settlement, Class Certification, and Plan of Allocation; and (B) Motion for Attorneys' Fees, Litigation Expenses, and Incentive Award; (iii) the Memorandum of Law in Support of Plaintiff's Motion for Attorneys' Fees, Litigation Expenses, and Incentive Award; (iv) the Declaration of Emily Young Regarding (A) Distribution of the Notice, (B) Maintenance of the Settlement Website, and (C) Publication of the Summary Notice; (v) the Declaration of Eric Shahinian in Support of (A) Motion for Final Approval of Settlement, Class Certification, and Plan of Allocation; and (B) Motion for Attorneys' Fees, Litigation Expenses, and Incentive Award; (vi) the Declaration of Jacob Ma-Weaver in Support of (A) Motion for Final Approval of Settlement, Class Certification, and Plan of Allocation; and (B) Motion for Attorneys' Fees, Litigation Expenses, and Incentive Award; and (vii) all other papers and proceedings herein.

A proposed Order granting the requested relief will be submitted with Lead Plaintiff's reply papers after the deadline for objecting to the Settlement has passed.

Dated: August 22, 2024

Respectfully submitted,



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*Attorneys for Lead Plaintiff and the
Proposed Settlement Class*