

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

SHANE LAVIN, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

VIRGIN GALACTIC HOLDINGS, INC.,
MICHAEL A. COLGLAZIER, GEORGE
WHITESIDES, DOUG AHRENS, and JON
CAMPAGNA,

Defendants.

CASE No.: 1:21-cv-03070-ARR-TAM

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court’s Scheduling Order (March 12, 2026 docket entry), on July 9, 2026, at 10:00 a.m., before the Honorable Taryn A. Merkl in Courtroom 13D South at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, plaintiffs Jennifer Ortiz, Raymond Ochs, Hesham Ibrahim, and Montgomery Brantley (collectively, “Plaintiffs”), will and hereby do move the Court to: (1) grant final approval of the Settlement in the above-captioned action on the terms set forth in the Stipulation and Agreement of Settlement dated November 3, 2025 (“Stipulation”; ECF No. 198-1); (2) finally certify the Settlement Class; and (3) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.¹

This motion is based on this Notice of Motion; the Memorandum of Law in support thereof; the Joint Declaration of Jonathan Horne and Ex Kano S. Sams II in Support of: (I) 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 Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.²

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Stipulation.

² Proposed Orders granting the requested relief will be submitted with Plaintiffs’ reply papers after the deadlines for objecting to the motion or requesting exclusion have passed.

Dated: May 27, 2026

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2026, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system

/s/ Jonathan Horne
Jonathan Horne