

**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 AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

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, lead counsel The Rosen Law Firm, P.A. and Glancy Prongay Wolke & Rotter LLP (collectively, “Lead Counsel”) will and hereby do move the Court for entry of an Order awarding attorneys’ fees in the amount of 33⅓% the Settlement Fund (or \$2,833,333, plus interest at the same rate as the Settlement Fund) and reimbursement of Litigation Expenses in the total amount of \$1,278,037.21 (comprised of \$1,223,037.21 in out-of-pocket costs incurred by Lead Counsel, and an aggregate of \$55,000 (\$10,000 each to plaintiffs Jennifer Ortiz, Raymond Ochs, Hesham Ibrahim, and Montgomery Brantley, and \$7,500 each to former lead plaintiffs Robert Scheele and Mark Kusnier), as authorized by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4).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 Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Settlement, dated November 3, 2025 (ECF No. 198-1).

² A proposed Order granting the requested relief will be submitted with Lead Counsel’s reply papers after the deadline for objecting to the motion has 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