

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(COLUMBIA DIVISION)

*In re SCANA Corporation Securities
Litigation*

Civil Action No. 3:17-CV-2616-MBS

**LEAD PLAINTIFFS' MOTION FOR APPROVAL OF
SETTLEMENT DISTRIBUTION PLAN**

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Lead Plaintiffs, the West Virginia Investment Management Board (“West Virginia IMB”) and Stichting Blue Sky Global Equity Active Low Volatility Fund and Stichting Blue Sky Active Large Cap Equity USA Fund (“Blue Sky”) (collectively, “Lead Plaintiffs”), hereby move this Court for approval of their distribution plan pursuant to Federal Rule of Civil Procedure 23(e) and this Court’s Order and Opinion Approving Settlement (ECF No. 238) and Order and Opinion on Plan of Allocation (ECF No. 239), and for entry of the accompanying [Proposed] Order Approving Settlement Distribution Plan (the “Class Distribution Order”). In further support of this motion, Lead Plaintiffs submit (i) the accompanying Memorandum of Points and Authorities in Support of Lead Plaintiffs’ Motion for Approval of Settlement Distribution Plan; (ii) the accompanying Declaration of Alexander P. Villanova in Support of Lead Plaintiffs’ Motion for Approval of Settlement Distribution Plan (the “Villanova Declaration”)¹ submitted on behalf of the Court-approved Claims Administrator, Epiq Class Action and Claims Solutions, Inc. (“Epiq”); and (iii) all other papers and proceedings herein.

Among other things, the Class Distribution Order would: (i) approve the administrative determinations of Epiq, accepting and rejecting Claims submitted in connection with the Settlement reached in the above-captioned Action as stated in the Villanova Declaration; (ii) direct the distribution of the Net Settlement Fund to Claimants whose Claims are accepted by Epiq as valid and approved by the Court (“Authorized Claimants”), while maintaining a Reserve for any tax liability and claims administration-related contingencies that may arise, pursuant to the proposed Distribution Plan; (iii) approve the recommended plan for any unclaimed funds

¹ All terms with initial capitalization not otherwise defined herein have the meanings ascribed to them in the Villanova Declaration or in the Stipulation and Agreement of Settlement, dated as of December 20, 2019 (ECF No. 214-2) (the “Stipulation”).

remaining after the distribution(s); (iv) approve Epiq's fees and expenses incurred and estimated to be incurred in the administration of the Settlement; (v) release claims related to the administration process; and (vi) authorize the destruction of Claim Forms and supporting documents at an appropriate time.

Pursuant to the terms of the Stipulation, this Motion is unopposed by Defendants. As this matter is fully briefed before the Court, a hearing on this motion is not required. Lead Counsel respectfully request that this motion be decided on the papers.

CERTIFICATION PURSUANT TO LOCAL RULE 7.02

Pursuant to Local Rule 7.02, counsel for Lead Plaintiffs certify that, prior to filing the foregoing motion, they conferred with Defendants' counsel and Defendants do not oppose this motion.

DATED: April 26, 2021

/s/ Marlon E. Kimpson

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