

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SAN ANTONIO FIRE AND POLICE  
PENSION FUND, FIRE AND POLICE  
HEALTH CARE FUND, SAN ANTONIO,  
PROXIMA CAPITAL MASTER FUND LTD.,  
and THE ARBITRAGE FUND,

Plaintiffs,

v.

DOLE FOOD COMPANY, INC., DAVID H.  
MURDOCK and C. MICHAEL CARTER,

Defendants.

Civil Action No. 1:15-cv-1140-LPS

**LEAD COUNSEL'S MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

Pursuant to Federal Rule of Civil Procedure 23(h) and this Court's Amended Order Preliminarily Approving Settlement and Providing for Notice dated March 30, 2017 (D.I. 89), and upon (i) Joint Declaration of Katherine M. Sinderson and Vincent R. Cappucci in Support of: (I) Lead 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; (ii) the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and (iii) all other papers and proceedings herein, Lead Counsel will and hereby do move this Court, before the Honorable Leonard P. Stark, on July 18, 2017 at 11:00 a.m., at the United States District Court for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Wilmington, Delaware 19801-3568, or at such other location and time as set by the Court, for entry of an Order awarding attorneys' fees and reimbursement of litigation expenses. 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: June 13, 2017

Respectfully submitted,

/s/ Joel Friedlander

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