

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

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Amended Order Preliminarily Approving Settlement and Providing for Notice dated March 30, 2017 (D.I. 89), and upon (i) the 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 Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (iii) all other papers and proceedings herein, Lead Plaintiffs, Proxima Capital Master Fund Ltd., San Antonio Fire and Police Pension Fund, Fire and Police Retiree Health Care Fund, San Antonio, and The Arbitrage Fund, on behalf of themselves and the Settlement Class, 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 a Judgment approving the Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. A proposed Judgment and Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: June 13, 2017

Respectfully submitted,

/s/ Joel Friedlander

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