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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLANTRONICS, INC. SECURITIES
LITIGATION

No. 4:19-cv-07481-JST

**REPLY IN FURTHER SUPPORT
OF LEAD COUNSEL'S MOTION
FOR ATTORNEYS' FEES AND
LITIGATION EXPENSES**

Judge: Hon. Jon S. Tigar
Courtroom: 6
Date: August 21, 2025
Time: 2:00 p.m.

1 Lead Counsel respectfully submit this reply memorandum of law in further support of their
2 motion for attorneys' fees and litigation expenses (ECF Nos. 242-243). Following an extensive
3 notice program undertaken in accordance with the Court's Preliminary Approval Order, not a
4 single Settlement Class Member has objected to the requested fees and expenses.

5 The Notice to the Settlement Class Members informed them that Lead Counsel would
6 apply for an award of attorneys' fees in an amount not to exceed 22% of the Settlement Fund and
7 payment of Litigation Expenses in an amount not to exceed \$750,000. *See* Notice ¶¶ 5, 57 (Initial
8 Segura Decl., ECF No. 243-4). The Notice also advised Settlement Class Members of their right
9 to object to the requested attorneys' fees and expenses, and the June 25, 2025 deadline for doing
10 so. *See id.* at p. 3 & ¶¶ 58, 66. On April 25, 2025, two months prior to the objection deadline,
11 Lead Counsel filed their detailed motion for attorneys' fee and litigation expenses with the Court.
12 Those papers are available on the public docket (ECF Nos. 242-243) and were posted to the case
13 website, www.PlantronicsSecuritiesLitigation.com, the same day (ECF No. 248, ¶ 7).

14 No objection to Lead Counsel's motion was submitted. ECF No. 247, ¶ 79. The absence
15 of any objections to the requested attorneys' fees and Litigation Expenses supports a finding that
16 the requested fees and expenses is fair and reasonable. *See, e.g., Acosta v. Frito-Lay, Inc.*, 2018
17 WL 2088278, at *12 (N.D. Cal. May 4, 2018) ("The absence of objections or disapproval by class
18 members . . . supports the finding that Plaintiffs' request is reasonable."); *Destefano v. Zynga, Inc.*,
19 2016 WL 537946, at *18 (N.D. Cal. Feb. 11, 2016) ("the lack of objection by any Class Members"
20 supported the fee requested); *In re Nuvelo, Inc. Sec. Litig.*, 2011 WL 2650592, at *3 (N.D. Cal.
21 July 6, 2011) (finding only one objection to the fee request to be "a strong, positive response from
22 the class, supporting an upward adjustment of the benchmark [fee award]"); *In re Heritage Bond*
23 *Litig.*, 2005 WL 1594403, at *21 (C.D. Cal. June 10, 2005) ("The absence of objections or
24 disapproval by class members to Class Counsel's fee request further supports finding the fee
25 request reasonable.").

26 For the foregoing reasons and the reasons set forth in their opening papers, Lead Counsel
27 respectfully request that the Court approve their motion for attorneys' fees and litigation expenses.
28

1 Dated: July 10, 2025

**BERNSTEIN LITOWITZ BERGER
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/s/ John Rizio-Hamilton

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