

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PENN WEST PETROLEUM LTD.
SECURITIES LITIGATION

Master File No. 14-cv-6046-JGK

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

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Providing for Notice dated March 1, 2016 and subsequent Order dated June 2, 2016, and upon (i) the Joint Declaration of John Rizio-Hamilton and Lionel Z. Glancy in Support of: (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (II) Co-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, Miami Fire Fighters' and Police Officers' Retirement Trust and Avi Rojany, on behalf of themselves and the Settlement Class, will and hereby do move this Court, before the Honorable John G. Koeltl, on June 28, 2016 at a time to be set by the Court, in Courtroom 12B of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007-1312, 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 3, 2016

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

GLANCY PRONGAY & MURRAY LLP

/s/ John Rizio-Hamilton

John Rizio-Hamilton
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
Email: johnr@blbglaw.com

/s/ Lionel Z. Glancy

Lionel Z. Glancy
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160
Email: lglancy@glancylaw.com

*Counsel for The City of Miami Fire Fighters'
and Police Officers' Retirement Trust and
Co-Lead Counsel for the Settlement Class*

*Counsel for Avi Rojany and Co-Lead Counsel
for the Settlement Class*

#990156