## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

In re BOSTON SCIENTIFIC CORPORATION SECURITIES LITIGATION

Master File No. 1:20-cv-12225-ADB

## LEAD COUNSEL'S MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(h) and this Court's Order Preliminarily Approving Proposed Settlement and Authorizing Dissemination of Notice of Settlement dated December 27, 2023, and upon (a) the Declaration of Salvatore J. Graziano in Support of (I) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (II) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; and (c) all other papers and proceedings herein, Lead Counsel will and does hereby move this Court, before the Honorable Allison D. Burroughs, on April 23, 2024 at 9:00 a.m. in Courtroom 17 of the John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston, MA 02210, or at such other location and time as set by the Court, for entry of an Order awarding attorneys' fees and Litigation Expenses, including reimbursement of Lead Plaintiff's costs pursuant to 15 U.S.C. §78u-4(a)(4). A proposed Order granting the relief requested will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

DATED: March 19, 2024

Respectfully submitted,

## BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

/s/ Salvatore J. Graziano

Salvatore J. Graziano (admitted *pro hac vice*)
Michael D. Blatchley (admitted *pro hac vice*)
Lauren A. Ormsbee (admitted *pro hac vice*)
Aasiya F. Mirza Glover (admitted *pro hac vice*)
Emily A. Tu (admitted *pro hac vice*)
1251 Avenue of the Americas, 44th Floor
New York, NY 10020

Telephone: (212) 554-1400 Facsimile: (212) 554-1444 salvatore@blbglaw.com michaelb@blbglaw.com lauren@blbglaw.com aasiya.glover@blbglaw.com emily.tu@blbglaw.com

Lead Counsel for Lead Plaintiff and the Settlement Class

## DONNELLY, CONROY & GELHAAR, LLP

T. Christopher Donnelly (BBO #129930) Peter E. Gelhaar (BBO #18830) Peter K. Levitt (BBO #565761) 260 Franklin Street, Suite 1600 Boston, Massachusetts 02110 Telephone: (617) 720-2880 Facsimile: (617) 720-3554

tcd@dcglaw.com peg@dcglaw.com pkl@dcglaw.com

Liaison Counsel for Lead Plaintiff