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Fulton County Employees' Retirement System
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CITY OF SOUTHFIELD FIRE AND
POLICE RETIREMENT SYSTEM,
Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

HAYWARD HOLDINGS, INC.,
KEVIN HOLLERAN, EIFION
JONES, CCMP CAPITAL
ADVISORS, LP, CCMP CAPITAL
INVESTORS III, L.P., CCMP
CAPITAL INVESTORS III
(EMPLOYEE), L.P., CCMP CAPITAL
ASSOCIATES III, L.P., CCMP
CAPITAL ASSOCIATES III GP,
LLC, CCMP CAPITAL, LP, CCMP
CAPITAL GP, LLC, MSD AQUA
PARTNERS, LLC, MSD PARTNERS,
L.P., MSD PARTNERS (GP), LLC,
MARK MCFADDEN, GREG

Civil Action No. 2:23-cv-04146

Hon. William J. Martini

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

Oral Argument Requested

**Motion Day: July 28, 2026, 12:00
p.m.**

BRENNEMAN, TIMOTHY WALSH,
CHRISTOPHER BERTRAND, and
KEVIN BROWN

Defendants.

PLEASE TAKE NOTICE that on July 28, 2026 at 12:00 p.m., or such other date and time set by the Court, Plaintiff Fulton County Employees' Retirement System ("Lead Plaintiff"), on behalf of the preliminarily certified Class, will, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, respectfully move this Court, the Honorable William J. Martini, United States District Judge of the United States District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey, for entry of the proposed Judgment and Order Granting Final Approval of Class Action Settlement, which grants final approval of the proposed class action settlement on the terms set forth in the Stipulation and Agreement of Settlement and Release dated January 23, 2026 ("Stipulation") (ECF No. 128-2), and for entry of an order which approves the proposed plan of allocation of the settlement proceeds.

In support of this motion, Lead Plaintiff relies on the accompanying Memorandum of Law, and the Declarations of Max R. Schwartz and Ann Cavanaugh; the Court's order granting preliminary approval of the settlement; the pleadings and records on file in this action; and such other matters as the Court may consider.

DATED: May 6, 2026

**COHN LIFLAND PEARLMAN
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s/ Matthew F. Gately

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