

Matthew F. Gately  
**COHN LIFLAND PEARLMAN  
HERRMANN & KNOPF LLP**  
Park 80 West-Plaza One  
250 Pehle Avenue, Suite 401  
Saddle Brook, NJ 07663  
Telephone: 201-845-9600  
Facsimile: 201-845-9423  
mfg@njlawfirm.com

*Counsel for Lead Plaintiff  
Fulton County Employees' Retirement System  
[Additional Counsel Appear on Signature Page]*

**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  
LEAD PLAINTIFF'S MOTION  
FOR ATTORNEYS' FEES,  
LITIGATION EXPENSES, AND  
LEAD PLAINTIFF AWARD  
PURSUANT TO 15 U.S.C. §78u-  
4(a)(7)**

**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, Lead Plaintiff Fulton County Employees' Retirement System ("Lead Plaintiff") will 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 an Order awarding Plaintiff's Counsel attorneys' fees and litigation expenses, and Lead Plaintiff a service award.

In support of this motion, Plaintiff relies on the accompanying Memorandum of Law, Declaration of Max R. Schwartz in Support of Lead Plaintiff's Motion for Attorneys' Fees, Litigation Expenses, and Service Award and Exhibits thereto, 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  
HERRMANN & KNOPF LLP**

*s/ Matthew F. Gately*

---

Matthew F. Gately  
Michael Alderman  
Park 80 West-Plaza One  
250 Pehle Avenue, Suite 401  
Saddle Brook, NJ 07663  
Telephone: 201-845-9600  
mfg@njlawfirm.com  
ma@njlawfirm.com

*Liaison Counsel for Lead Plaintiff and  
the Class*

**SCOTT+SCOTT ATTORNEYS AT  
LAW LLP**

Max R. Schwartz  
Karolina Klyuchnikova  
Donald A. Broggi  
The Helmsley Building  
230 Park Avenue, 24th Floor  
New York, New York 10169  
Telephone: 212-233-6444  
mschwartz@scott-scott.com  
kklyuchnikova@scott-scott.com  
dbroggi@scott-scott.com

Cornelia Gordon  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Telephone: 619-233-4565  
cgordon@scott-scott.com

*Lead Counsel for Lead Plaintiff and the  
Class*