

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE COBALT INTERNATIONAL  
ENERGY, INC. SECURITIES LITIGATION

Lead Case No. 4:14-cv-3428 (NFA)

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

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and upon (a) the Joint Declaration of Andrew J. Entwistle and David R. Stickney in Support of (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlements and Plan of Allocation, and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; (b) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Class Action Settlements and Plan of Allocation; and (c) all other papers and proceedings herein, Lead Plaintiffs will, and do hereby, move this Court, before the Honorable Nancy F. Atlas, on February 13, 2019 at 10:00 a.m. at the United States Courthouse, 515 Rusk Street, Houston, TX 77002 or at such other location and time as set by the Court, for entry of the:

- 1) Judgment Approving Class Action Settlement with the Sponsor Defendants, the Sponsor Designee Defendants and Goldman Sachs & Co. LLC, attached as Exhibit A to the accompanying Memorandum of Law;
- 2) Judgment Approving Class Action Settlement Among the Plaintiffs, Cobalt Individual Defendants, and Nader Tavakoli, Solely Acting as Plan

Administrator on Behalf of the Cobalt Defendants, attached as Exhibit B to the accompanying Memorandum of Law;

- 3) Judgment Approving Class Action Settlement Between Plaintiffs and Underwriter Defendants Other Than Goldman Sachs & Co. LLC, attached as Exhibit C to the accompanying Memorandum of Law; and
- 4) [Proposed] Order Approving Plan of Allocation of Net Settlement Fund, attached as Exhibit D to the accompanying Memorandum of Law.

Dated: January 9, 2019

Respectfully submitted,

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By: /s/ Andrew J. Entwistle

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**CERTIFICATE OF SERVICE**

I certify that on January 9, 2019, the foregoing was filed with Clerk of the Court through the Court's ECF system, which will cause the document to be served upon all counsel of record.

*/s/ Andrew J. Entwistle* \_\_\_\_\_

Andrew J. Entwistle