

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: COMMERCIAL DIVISION

In re SEA LIMITED SECURITIES  
LITIGATION

This Document Relates To:

ALL ACTIONS.

Index No. 151344/2022

The Honorable Andrew Borrok, J.S.C.  
Part 53

**Motion Sequence No. 8**

CLASS ACTION

**AFFIRMATION OF NICOLAS HILL IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR (1) FINAL APPROVAL OF THE  
SETTLEMENT AND APPROVAL OF  
THE PLAN OF ALLOCATION; AND (2)  
AN AWARD OF ATTORNEYS' FEES  
AND EXPENSES AND AWARD TO  
PLAINTIFFS**

I, NICOLAS HILL, affirm as follows:

1. I am the Chairperson for the City of Taylor Police and Fire Retirement System (the "Fund"), a Lead Plaintiff in this Action.<sup>1</sup> I respectfully submit this affirmation in support of Plaintiffs' Motion for (1) Final Approval of the Settlement and Approval of the Plan of Allocation; and (2) an Award of Attorneys' Fees and Expenses and Award to Plaintiffs.

2. The Fund, established pursuant to and in accordance with the Fire Fighters and Police Officers Retirement Act (Michigan Public Act 345 of 1937, as amended) and applicable collective bargaining agreements, administers pension and retirement benefits for the personnel of fire and police departments and eligible beneficiaries.

3. The Fund, together with its outside counsel at Vanoverbeke, Michaud & Timmony, P.C., oversaw this litigation and lead counsel for Plaintiffs, Abraham Fruchter & Twersky, LLP and Robbins Geller Rudman & Dowd LLP (together, "Lead Counsel"). The Fund has participated

<sup>1</sup> Unless otherwise indicated, capitalized terms have the meanings set forth in the Stipulation of Settlement filed with the Court on March 4, 2025. [NYSCEF No. 149](#).

in and monitored the progress of this Action since it authorized the filing of its initial complaint. The Fund has participated in meetings and calls, followed procedural developments, reviewed motions and briefs, approved the filing and pursuit of the appeal, and authorized the mediation and settlement of this matter.

4. The Fund was committed to optimizing the outcome of this Action. The Fund believes that the proposed Settlement Amount of \$40 million represents an outstanding result for the Settlement Class and the proposed Settlement merits the Court's approval.

5. While the Fund understands that the determination of attorneys' fees is left to the discretion of the Court, the Fund supports Lead Counsels' application for fees amounting to 33 1/3% of the Settlement Amount and payment of their requested expenses. The Fund believes the fee and expense request is reasonable and appropriate as this Settlement would not have been possible without the diligent efforts of Lead Counsel, which litigated this Action for over three years without compensation or reimbursement of any kind.

6. In connection with Lead Counsel's application for an award of attorneys' fees and expenses, the Fund also respectfully requests that the Court grant an award of \$5,000 to each of the Lead Plaintiffs, including the Fund, for the time and effort the Fund expended representing Settlement Class Members in this Action, overseeing Lead Counsels' efforts, and reviewing and authorizing important decisions in the litigation, including Settlement.

I affirm, on July 2<sup>nd</sup>, 2025 at Taylor, Michigan, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

Signed by:  
  
DA054668A97E13D

NICOLAS HILL

CITY OF TAYLOR POLICE AND FIRE  
RETIREMENT SYSTEM

**PRINTING SPECIFICATIONS STATEMENT**

1. Pursuant to 22 N.Y.C.R.R. §202.70(g), Rule 17, the undersigned counsel certifies that the foregoing affirmation was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman

Point Size: 12

Line Spacing: Double

2. The total number of words in the affirmation, inclusive of point headings and footnotes and exclusive of the caption, table of contents, table of authorities, signature block, and this Certification, is 470 words. By operation of Microsoft Word's word count function, this number includes legal citations, numerical information, and certain forms of punctuation.

DATED: July 3, 2025

ROBBINS GELLER RUDMAN  
& DOWD LLP  
JOSEPH RUSSELLO

/s/ Joseph Russello  
JOSEPH RUSSELLO

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)  
jrussello@rgrdlaw.com