

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE HUB CYBER SECURITY LTD.

Master File No. 1:23-cv-05764-AS

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

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to the Court’s Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 140), on June 29, 2026, at 11:00 a.m., before the Honorable Arun Subramanian in Courtroom 15A of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, Court-appointed lead plaintiffs Aryeh Agam and Shimon Aharon (collectively, “Lead Plaintiffs”) and named plaintiffs Rodrigue Fodjo and Dustin Green (collectively, with Lead Plaintiffs, “Plaintiffs”), will and hereby do move the Court to: (1) grant final approval of the Settlement in the above-captioned action on the terms set forth in the Stipulation and Agreement of Settlement dated December 9, 2025 (“Stipulation”; ECF No. 138-1); and (2) approve the proposed Plan of Allocation for distribution of the Net Settlement Fund.¹

This motion is based on this Notice of Motion; the Memorandum of Law in support thereof; the Declaration of Casey E. Sadler in Support of: (I) Plaintiffs’ Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.²

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Stipulation.

² Proposed Orders granting the requested relief will be submitted with Plaintiffs’ reply papers after the deadlines for objecting to the motion or requesting exclusion have passed.

Dated: May 22, 2026

Respectfully yours,

**GLANCY PRONGAY WOLKE &
ROTTER LLP**

s/ Daniella Quitt

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*Counsel for Additional Named Plaintiffs
Rodrigue Fodjo and Dustin Green*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May 2026, I caused a true and correct copy of the foregoing Notice of Motion for Final Approval of Class Action Settlement and Plan of Allocation to be e-filed by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Daniella Quitt

Daniella Quitt