

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE BAXTER INTERNATIONAL INC.
SECURITIES LITIGATION

Case No. 1:19-cv-07786

District Judge Sara L. Ellis

Magistrate Judge Jeffrey I. Cummings

**LEAD PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION**

Lead Plaintiffs, Louisiana Municipal Police Employees' Retirement System and Varma Mutual Pension Insurance Company, on behalf of themselves and the Settlement Class, respectfully move this Court, under Rule 23(e) of the Federal Rules of Civil Procedure, for entry of a Judgment approving the Settlement as fair, reasonable, and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.¹

This Motion is based upon (a) the Joint Declaration of James A. Harrod and Sharan Nirmul in Support of (I) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation and (II) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses, (b) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation, (c) and all other papers and proceedings herein. A proposed Judgment and a proposed Order granting the requested relief will be submitted with Lead Plaintiffs' reply papers after the deadline for objecting to the Settlement and requesting exclusion from the Settlement Class has passed.

¹ All capitalized terms not defined herein have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated April 1, 2021 (ECF No. 57-1).

Dated: July 6, 2021

Respectfully submitted,

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-and-

/s/ James A. Harrod

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