

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

PUBLIC EMPLOYEES' RETIREMENT  
SYSTEM OF MISSISSIPPI, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

MOHAWK INDUSTRIES, INC. and  
JEFFREY S. LORBERBAUM,

Defendants.

Civ. A. No. 4:20-cv-00005-VMC

**LEAD COUNSEL'S MOTION FOR  
ATTORNEYS' FEES AND LITIGATION EXPENSES**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h), and upon (a) the Memorandum of Law in Support of Lead Counsel's Motion for Attorneys' Fees and Litigation Expense; (b) the Declaration of John C. Browne in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation and (ii) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; and (c) all other papers and proceedings herein, Lead Counsel will and does hereby move this Court, before the Honorable Victoria M. Calvert, on May 31, 2023, at 10:00 a.m., for entry of an Order awarding attorneys' fees and litigation expenses.

A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers following the deadline for any objection to the motion.

Dated: April 26, 2023

Respectfully submitted,

/s/ John C. Browne

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**RULE 7.1(D) CERTIFICATION**

The undersigned counsel certifies that this document has been prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1(C).

/s/ John C. Browne  
John C. Browne (admitted *pro hac vice*)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2023, I filed the foregoing LEAD COUNSEL'S MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES using the Court's CM/ECF system, which will automatically send notification to counsel of record.

/s/ John C. Browne  
John C. Browne (admitted *pro hac vice*)