

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re BARRICK GOLD SECURITIES	:	Civil Action No. 1:13-cv-03851-SAS
LITIGATION	:	
_____	:	<u>CLASS ACTION</u>
	:	
This Document Relates To:	:	<u>ECF Case</u>
	:	
ALL ACTIONS.	:	
_____	X	

**LEAD PLAINTIFFS’ NOTICE OF MOTION AND MOTION
FOR FINAL APPROVAL OF PROPOSED CLASS ACTION SETTLEMENT
AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that on October 18, 2016, at 10:00 a.m. at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 17B, New York, NY 10007, Lead Plaintiffs LRI Invest S.A. and Union Asset Management Holding AG (collectively, “Lead Plaintiffs”), on behalf of the proposed Class¹, will respectfully move this Court, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for orders granting final approval of (a) the proposed Settlement (including entry of the [Proposed Amended] Final Judgment and Order of Dismissal in the form previously annexed as Exhibit B to the Amended Stipulation of Settlement (ECF 167-1)), and (b) the Plan of Allocation.

Lead Plaintiffs will submit their reply papers in further support of final approval of the Settlement on September 30, 2016, (following the September 21, 2016 deadline for the submission of exclusion requests).

¹ Unless otherwise noted, all defined terms have the same meaning as in the Amended Stipulation of Settlement. ECF No. 167-1.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Lead Plaintiffs submit and are filing herewith: Lead Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Settlement and Plan of Allocation, dated September 7, 2016; and the Declaration of James M. Hughes in Support of Lead Plaintiffs' Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation and Lead Counsel's Motion for Attorneys' Fees and Payment of Litigation Expenses, dated September 7, 2016, with annexed exhibits.

DATED: September 7, 2016

Respectfully submitted,

MOTLEY RICE LLC

/s/ James M. Hughes

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Liaison Counsel for Lead Plaintiffs and the Class

CERTIFICATE OF SERVICE

I, James M. Hughes, hereby certify that on September 7, 2016, I caused a true and correct copy of the attached Lead Plaintiffs' Notice of Motion and Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation to be served electronically on all counsel registered for electronic service for this case.

/s/ James M. Hughes

James M. Hughes