

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

IN RE: BIT DIGITAL, INC.
SECURITIES LITIGATION

This document relates to:

All Actions

Lead Case No. 1:21-cv-00515-ALC

**LEAD COUNSEL'S NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND EXPENSES AND AN AWARD TO LEAD PLAINTIFF
PURSUANT TO 15 U.S.C. §78u-4(a)(4)**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Counsel will move this Court on March 10, 2023, at 2:30 p.m., before the Honorable Andrew L. Carter, Jr., for entry of an order, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) awarding attorneys' fees; (2) paying litigation expenses incurred in prosecuting the above-captioned action; and (3) approving an award to Lead Plaintiff pursuant to 15 U.S.C. §78u-4(a)(4). This motion is based on: (i) the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (ii) the Declarations of Jacob A. Walker in Support of Motions for: (1) Final Approval of Class Action Settlement and Approval of Plan of Allocation, and (2) an Award of Attorneys' Fees and Expenses; (iii) the Declaration of Justin R. Hughes Regarding Notice Dissemination, Publication, and Requests for Exclusion and Objections Received to Date; (iv) the Stipulation of Settlement; and (v) all other proceedings herein.

A proposed order will be submitted with Lead Plaintiff's reply submission on or before March 3, 2023.

DATED: February 3, 2023

/s/ Jacob A. Walker

Jeffrey C. Block

Jacob A. Walker, *pro hac vice*

Sarah E. Delaney

BLOCK & LEVITON LLP

260 Franklin Street, Suite 1860

Boston, MA 02110

(617) 398-5600 phone

(617) 507-6020 fax

jeff@blockleviton.com

jake@blockleviton.com

sarah@blockleviton.com

Lead Counsel for Lead Plaintiff and the Class

CERTIFICATE OF SERVICE

I, Jacob A. Walker, hereby certify that on February 3, 2023, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ JACOB A. WALKER
JACOB A. WALKER