

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

In re Textron Inc. Securities Litigation

CASE NO.: 1:19-CV-7881-DC

LEAD PLAINTIFF’S NOTICE OF MOTION FOR (1) FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION AND (2) AWARD OF ATTORNEYS’ FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

Please take notice that, pursuant to Federal Rules of Civil Procedure 23(e) and this Court’s Order Preliminarily Approving Settlement and Providing for Notice dated August 23, 2022 (the “Preliminary Approval Order”) (ECF No. 79), and upon (i) the Declaration of Frederic S. Fox in Support of (1) Lead Plaintiff’s Motion for Final Approval of Settlement and Plan of Allocation and (2) Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; (ii) the Declaration of Adam D. Walter Regarding: (A) Mailing of Notice and Claim Form; (B) Publication of Summary Notice; and (C) Report on Requests for Exclusion Received to Date; (iii) the Declaration of Mark Guiton in Support of Motion for Final Approval of Class Action Settlement and Motion for an Award of Attorneys’ Fees and Expenses; (iv) the Memorandum of Law in Support of Lead Plaintiff’s Motion for Final Approval of Settlement and Plan of Allocation; (v) the Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; and (vi) and all other papers and proceedings herein, Lead Plaintiff, IWA Forest Industry Pension Plan, on behalf of itself and the Settlement Class, will and do hereby move this Court, before the Honorable Denise Cote, on November 18, 2022 at 3:00 p.m. at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 18B, New York, New York 10007, or at such other location and time as

set by the Court, for entry of Judgment approving the Settlement and the issuance of Settlement Shares as fair, reasonable and adequate, for entry of an Order approving the proposed Plan of Allocation as fair and reasonable, and for an Order approving an award of Attorneys' Fees and reimbursement of Litigation Expenses.

Attached hereto as Exhibit A is the [Proposed] Final Judgment and Order of Dismissal with Prejudice that Lead Plaintiff respectfully requests the Court sign and enter.

Dated: October 14, 2022

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

/s/ Frederic S. Fox

Frederic S. Fox

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*Lead Counsel for Lead Plaintiff and the
Settlement Class*

CERTIFICATE OF SERVICE:

I hereby certify that on October 14, 2022, I caused the foregoing Lead Plaintiff's Notice of Motion For (1) Final Approval of Class Action Settlement and Plan of Allocation and (2) Award of Attorneys' Fees and Reimbursement of Litigation Expenses, and all supporting documents, to be served electronically on all counsel of record.

s/ Frederic S. Fox

Frederic S. Fox