

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

IN RE NORTHERN DYNASTY  
MINERALS LTD. SECURITIES  
LITIGATION

Case No. 1:20-cv-05917-ENV-TAM

**NOTICE OF MOTION FOR FINAL APPROVAL OF PROPOSED CLASS ACTION  
SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (Dkt. No. 67-1), Lead Plaintiff Lawrence Kelemen and Named Plaintiff Charles Hymowitz ("Plaintiffs"), by their undersigned counsel, hereby move this Court, before the Honorable Taryn A. Merkl, United States Magistrate Judge of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, on December 7, 2023 at 10:30 a.m., for entry of an Order granting final approval of the proposed class action settlement.

This motion is based on this Notice of Motion, Plaintiffs' supporting Memorandum of Law, and the Declaration of Emma Gilmore and exhibits attached thereto, all filed contemporaneously herewith, all pleadings, records, and papers on file herein, and such further argument and briefing as may be presented at or before any hearing. Plaintiffs will file a proposed final order and judgment with their reply, to account fully for any requests for exclusions or objections received by the November 16, 2023 deadline.

Dated: November 9, 2023

Respectfully submitted,

**POMERANTZ LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 9, 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

By: /s/ Emma Gilmore  
Emma Gilmore