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Liaison Counsel

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

In re VESTAS WIND SYSTEMS A/S )  
SECURITIES LITIGATION )  
\_\_\_\_\_ )

Case No. 3:11-cv-00585-MO

CLASS ACTION

This Document Relates To: )  
 )  
ALL ACTIONS. )  
\_\_\_\_\_ )

NOTICE OF MOTION AND UNOPPOSED  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT, PLAN OF  
ALLOCATION OF SETTLEMENT  
PROCEEDS, AND APPLICATION FOR AN  
AWARD OF ATTORNEYS' FEES AND  
EXPENSES

**ORAL ARGUMENT REQUESTED**

**LR 7.1 CERTIFICATION**

Pursuant to LR 7.1, counsel for Lead Plaintiff certify that they have conferred with counsel for defendant Vestas Wind Systems A/S (“Vestas”) regarding the issues set forth in this motion. The parties request the Court to grant the motion to approve the settlement. Vestas does not oppose the other relief sought by the motion.

**MOTION**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that pursuant to this Court’s Order entered July 30, 2014, on December 9, 2014, at 11:00 a.m., in the courtroom of the Honorable Michael W. Mosman, at the Mark O. Hatfield United States Courthouse, 1000 S.W. Third Avenue, Portland, Oregon, Lead Plaintiff will move the Court to (1) grant final approval of the settlement set forth in the Stipulation of Settlement dated as of June 26, 2014 (“Stipulation”); (2) approve the Plan of Allocation of settlement proceeds; and (3) award attorneys’ fees and expenses. Lead Plaintiff’s motion is based on the accompanying Memorandum in Support of Unopposed Motion for Final Approval of Class Action Settlement, Plan of Allocation of Settlement Proceeds, and Application for an Award of Attorneys’ Fees and Expenses, the declarations filed in support thereof, the Stipulation, all other pleadings and matters of record, and such additional evidence and testimony as may be presented at the hearing on Lead Plaintiff’s motion.

DATED: November 4, 2014

ROBBINS GELLER RUDMAN  
& DOWD LLP  
KEITH F. PARK  
HENRY ROSEN  
TRIG R. SMITH

s/ Trig R. Smith

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Additional Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 4, 2014.

s/ Trig R. Smith

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TRIG R. SMITH

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## Mailing Information for a Case 3:11-cv-00585-MO In re: Vestas Wind Systems A/S Securities Litigation

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)