

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ABERDEEN CITY COUNCIL AS		:
ADMINISTRATING AUTHORITY FOR		:
THE NORTH EAST SCOTLAND PENSION		:
FUND,		:
		:
	Plaintiff,	:
		:
	vs.	:
		:
BLOOMBERG L.P.,		:
		:
	Defendant.	:
		:
<hr/>		:
<i>(In re Under Armour Securities Litigation,</i>		:
<i>Pending in the United States District Court,</i>		:
<i>District of Maryland, Civil No. RDB-17-388)</i>		:
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that plaintiff Aberdeen City Council as Administrating Authority for the North East Scotland Pension Fund hereby moves this Court, at a date and time to be determined by this Court, to compel Bloomberg L.P. to produce documents responsive to plaintiff's subpoena issued in *In re Under Armour Securities Litigation*, Civil No. RDB-17-388 (D. Md.). In support of this Motion, plaintiff submits herewith a memorandum of points and authorities in support thereof and the Declaration of Michael G. Capeci in Support of Plaintiff's Motion to Compel Bloomberg L.P. to Produce Documents Responsive to Plaintiff's Subpoena. Prior to the filing of this Motion, plaintiff and Bloomberg L.P. met and conferred in good faith on multiple occasions to resolve this discovery dispute but were unable to do so.

DATED: March 15, 2023

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
MICHAEL G. CAPECI (MC-0617/NY)

s/ Michael G. Capeci

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Lead Counsel for Plaintiff

DECLARATION OF SERVICE BY EMAIL

I, T. Alex B. Folkerth, not a party to the within action, hereby declare that on March 15, 2023, I served the attached document on the parties in the within action by email addressed as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed on March 15, 2023, at San Diego, California.

s/ T. Alex B. Folkerth

T. ALEX B. FOLKERTH