

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

JONATHAN D. USLANER (Bar No. 256898)
jonathanu@blbglaw.com
2121 Avenue of the Stars, Suite 2575
Los Angeles, CA 90067
Tel: (310) 819-3481

*Counsel for Lead Plaintiff Oklahoma
Firefighters Pension and Retirement System
and Lead Counsel for the Settlement Class*

[Additional counsel appear on signature page.]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GLAZING EMPLOYERS AND GLAZIERS'
UNION LOCAL #27 PENSION AND
RETIREMENT FUND, on behalf of itself and
all others similarly situated,

Plaintiff,

v.

IRHYTHM TECHNOLOGIES, INC., et al.,

Defendants.

Case No. 3:24-cv-706-JSC

**REPLY IN FURTHER SUPPORT OF
LEAD COUNSEL'S MOTION FOR
ATTORNEYS' FEES AND
LITIGATION EXPENSES**

CLASS ACTION

Date: November 5, 2026

Time: 9:00 a.m.

Judge: Hon. Jacqueline Scott Corley

1 Lead Counsel respectfully submits this reply memorandum of law in further support of its
2 motion for attorneys' fees and litigation expenses (Dkt. No. 157). Following an extensive notice
3 program undertaken in accordance with the Court's Preliminary Approval Order, which included
4 mailing Notice to over 84,000 potential Settlement Class Members and nominees, not a single
5 Settlement Class Member has objected to the requested fees and expenses. *See* Declaration of
6 Katherine M. Sinderson in Support of Lead Plaintiff's Motion for Final Approval of Settlement
7 and Plan of Allocation ("Sinderson Decl.") filed herewith, at ¶ 112.

8 The Notice to the Settlement Class Members informed them that Lead Counsel would
9 apply for an award of attorneys' fees in an amount not to exceed 25% of the Settlement Fund and
10 payment of Litigation Expenses in an amount not to exceed \$800,000. *See* Notice ¶¶ 5, 51 (Initial
11 Evans Decl., Dkt. No. 157-4). The Notice also advised Settlement Class Members of their right to
12 object to the requested attorneys' fees and expenses, and the October 1, 2026 deadline for doing
13 so. *See id.* at p. 3 & ¶¶ 60-63. On August 20, 2026, six weeks prior to the objection deadline, Lead
14 Counsel filed its detailed motion for attorneys' fees and litigation expenses with the Court. Dkt.
15 No. 157. Those papers were available immediately on the public docket, and were posted to the
16 case website, www.iRhythmSecuritiesLitigation.com, the next day. *See* Suppl. Evans Decl.
17 (Sinderson Decl. Ex. 2), at ¶ 6.

18 No objections to Lead Counsel's motion were submitted. Sinderson Decl. ¶ 112. The
19 absence of any objections to the requested attorneys' fees and Litigation Expenses supports a
20 finding that the requested fees and expenses are fair and reasonable. *See, e.g., Acosta v. Frito-Lay,*
21 *Inc.*, 2018 WL 2088278, at *12 (N.D. Cal. May 4, 2018) ("The absence of objections or
22 disapproval by class members . . . supports the finding that Plaintiffs' request is reasonable.");
23 *Destefano v. Zynga, Inc.*, 2016 WL 537946, at *18 (N.D. Cal. Feb. 11, 2016) ("the lack of objection
24 by any Class Members" supported the fee requested); *In re Heritage Bond Litig.*, 2005 WL
25 1594403, at *21 (C.D. Cal. June 10, 2005) ("The absence of objections or disapproval by class
26 members to Class Counsel's fee request further supports finding the fee request reasonable.").

1 For the foregoing reasons and the reasons set forth in its opening papers, Lead Counsel
2 respectfully requests that the Court approve its motion for attorneys' fees and litigation expenses.

3 Dated: October 22, 2026

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

/s/ Katherine M. Sinderson

JOHN J. RIZIO-HAMILTON (*pro hac vice*)

(johnr@blbglaw.com)

KATHERINE M. SINDERSON (*pro hac vice*)

(katiem@blbglaw.com)

ALEC T. COQUIN (*pro hac vice*)

(alec.coquin@blbglaw.com)

THOMAS Z. SPERBER (*pro hac vice*)

(thomas.sperber@blbglaw.com)

ABBY KRITTA (*pro hac vice*)

(abygail.kritta@blbglaw.com)

1251 Avenue of the Americas

New York, NY 10020

Tel: (212) 554-1400

Fax: (212) 554-1444

JONATHAN D. USLANER (Bar No. 256898)

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