

**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 PLAINTIFFS' MOTION FOR DISTRIBUTION OF CLASS ACTION  
SETTLEMENT FUNDS**

Lead Plaintiff Lawrence Kelemen and Named Plaintiff Charles Hymowitz (“Plaintiffs”), on behalf of themselves and all members of the Settlement Class, hereby respectfully move this Court for an Order granting this Motion for Distribution of Class Action Settlement Funds to the Settlement Class.

Plaintiffs respectfully contemporaneously submit a memorandum of points and authorities and the accompanying Declaration of Morgan Kimball Regarding Distribution Plan (the “Kimball Declaration”), together with its attached exhibits, which are incorporated herein by reference, in support of this Motion. Plaintiffs further rely upon all proceedings and papers herein.

Plaintiffs respectfully request that the Court decide the Motion on the papers and enter the [Proposed] Order Granting Plaintiffs’ Motion for Distribution of Class Action Settlement Funds, also submitted contemporaneously.

Dated: June 20, 2024

Respectfully submitted,

**POMERANTZ LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2024, 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