

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE ARIAD PHARMACEUTICALS, INC. ) No. 1:13-cv-12544 (WGY)  
SECURITIES LITIGATION )

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT  
AND PLAN OF ALLOCATION**

Pursuant to Rules 23(a), (b)(3) and (e) of the Federal Rules of Civil Procedure, the City of Fort Lauderdale Police & Fire Retirement System and William A. Gaul (the "Settlement Class Representatives"), on behalf of themselves and the proposed Settlement Class, by and through their counsel, respectfully move this Court to: (a) grant final approval of the Settlement and Plan of Allocation; (b) reaffirm its determination in the Order for Notice and Hearing and finally certify the Settlement Class for purposes of carrying out the Settlement; and (c) find that notice to the Settlement Class satisfies due process and the Private Securities Litigation Reform Act of 1995. A proposed form of final order and judgment will be filed with Settlement Class Representatives' reply papers on May 3, 2018, after the deadlines for objecting and seeking exclusion have passed.

In support of this Motion, the Settlement Class Representatives and Plaintiffs' Co-Lead Counsel rely on the (a) Stipulation and Agreement of Settlement dated November 29, 2017 (the "Stipulation") (ECF No. 236) and all its Exhibits; (b) Memorandum of Law in Support of Settlement Class Representatives' Motion for Final Approval of Class Action Settlement and Plan of Allocation submitted herewith; and (c) Joint Declaration of Sanford P. Dumain, John C. Browne, and Jonathan Gardner in Support of (I) Motion for Final Approval of Class Action Settlement and Plan of Allocation and (II) Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses and all Exhibits annexed thereto.

**Local Rule 7.1(a)(2) Certification**

Counsel for the Settlement Class Representatives hereby certify that the parties have conferred in good faith pursuant to Local Rule 7.1(a)(2) regarding the issues raised in this motion. Defendants make no admissions regarding liability or wrongdoing, or the propriety of class certification were the case not to settle. Defendants agree that the Settlement should be approved but have not adopted any statements set forth within this motion. Defendants take no position on the Plan of Allocation.

*[Remainder of this page intentionally left blank]*

DATED: April 5, 2018

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of April, 2018, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

*/s/ Sanford P. Dumain*

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Sanford P. Dumain