

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PENN WEST PETROLEUM LTD.
SECURITIES LITIGATION

Master File No. 14-cv-6046-JGK

**NOTICE OF CO-LEAD COUNSEL'S MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Settlement and Providing for Notice dated March 1, 2016 and subsequent Order dated June 2, 2016, and upon (i) the Joint Declaration of John Rizio-Hamilton and Lionel Z. Glancy in Support of: (I) Lead Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (II) Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; (ii) the Memorandum of Law in Support of Co-Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and (iii) all other papers and proceedings herein, Co-Lead Counsel will and hereby do move this Court, before the Honorable John G. Koeltl, on June 28, 2016 at a time to be set by the Court, in Courtroom 12B of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007-1312, or at such other location and time as set by the Court, for entry of an Order awarding attorneys' fees and reimbursement of Litigation Expenses. A proposed Order granting the requested relief will be submitted with Co-Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: June 3, 2016

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

GLANCY PRONGAY & MURRAY LLP

/s/ John Rizio-Hamilton

John Rizio-Hamilton
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
Email: johnr@blbglaw.com

/s/ Lionel Z. Glancy

Lionel Z. Glancy
1925 Century Park East, Suite 2100
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160
Email: lglancy@glancylaw.com

*Counsel for The City of Miami Fire Fighters'
and Police Officers' Retirement Trust and
Co-Lead Counsel for the Settlement Class*

*Counsel for Avi Rojany and Co-Lead Counsel
for the Settlement Class*

#990155