

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

In re:

SONY BMG CD
TECHNOLOGIES LITIGATION

Case No. 1:05-cv-09575-NRB

**CLASS COUNSEL'S NOTICE OF MOTION AND MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND INCENTIVE AWARDS
TO NAMED PLAINTIFFS**

**GIRARD GIBBS
& De BARTOLOMEO LLP**
Daniel C. Girard (Pro Hac Vice)
Jonathan K. Levine (JL-8390)
Elizabeth C. Pritzker (Pro Hac Vice)
Aaron M. Sheanin (Pro Hac Vice)
601 California Street, Suite 1400
San Francisco, California 94108
Telephone: (415) 981-4800

KAMBER & ASSOCIATES, LLC
Scott A. Kamber (SK-5794)
19 Fulton Street, Suite 400
New York, NY 10038
Telephone: (877) 773-5469

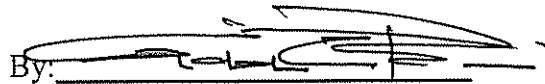
Class Counsel

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and the Joint Affidavit of Daniel C. Girard and Scott A. Kamber, and the Declarations of Peter Safirstein, Ira M. Press, Oren Giskan, Cornelius P. Dukelow, Barry M. Altman, Dennis A. Burke, Tracy D. Rezvani, Michael D. Halbfish, Alan Himmelfarb, Michael L. Kelly, Robert I. Lax, Douglas A. Linde, Daniel Lynch, Paul R. Huff, William A. Baird, Ethan Preston, Stephen Raff, Brian J. Robbins, Philip A. Tortoreti, Robert I. Harwood, Jennifer Sarnelli and Joseph E. Levi, Class Counsel will move this Court on May 22, 2006 at 9:15 a.m., or as soon thereafter as counsel may be heard, at the United States Courthouse, 500 Pearl Street, Room 2270, for an order awarding attorneys' fees, reimbursement of expenses, and incentive awards to named plaintiffs.

DATED: April 6, 2006

Respectfully submitted,

GIRARD GIBBS & De BARTOLOMEO LLP

By: 

Daniel C. Girard (Pro Hac Vice)
Jonathan K. Levine (JK-8390)
Elizabeth C. Pritzker (Pro Hac Vice)
Aaron M. Sheanin (Pro Hac Vice)
601 California Street, Suite 1400
San Francisco, California 94108
Telephone: (415) 981-4800

KAMBER & ASSOCIATES LLC

Scott A. Kamber (SK-5794)
19 Fulton Street, Suite 400
New York, NY 10038
Telephone: (877) 773-5469

Class Counsel

Peter Safirstein
Jennifer Czeisler
MILBERG WEISS BERSHAD & SCHULMAN LLP
One Pennsylvania Avenue
New York, New York 10119
Telephone: (212) 594-5300

Ira M. Press
KIRBY MCINERNEY & SQUIRE LLP
830 Third Avenue
New York, New York 10022
Telephone: (212) 317-2000

Jason L. Solotaroff
GISKAN & SOLOTAROFF LLP
207 West 25th Street
New York, New York 10001
Telephone: (212) 847-8315

Plaintiffs' Executive Committee Counsel