

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>MENACHEM GUREVITCH,</b>	)	CASE NO. 1:23 CV 01520
<b>Individually and on Behalf of All</b>	)	
<b>Others Similarly Situated,</b>	)	<b>JUDGE DONALD C. NUGENT</b>
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	
	)	
<b>KEYCORP, et al.,</b>	)	<b><u>ORDER</u></b>
	)	
<b>Defendants.</b>	)	

Pursuant to the *Memorandum of Opinion* issued in the above captioned case:  
the *Motion of Robert J. Titmas for Appointment as Lead Plaintiff and Approval of Selection of Counsel* (ECF #18) is GRANTED.

Robert J. Titmas is APPOINTED to serve as Lead Plaintiff in this Action pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995.

Robert J. Titmas' selection of Counsel is APPROVED, and Levi & Korsinsky is appointed as Lead Counsel for the Proposed Class, and Cummins Law LLC is APPOINTED as Liaison Counsel for the Proposed Class.

*Responsibilities of Lead Counsel*

Lead Counsel shall have the following responsibilities and duties, to be carried out either personally or through counsel whom Lead Counsel shall designate, including specifically Liaison Counsel:

1. To coordinate the briefing and argument of any and all motions;

2. To coordinate the conduct of any and all discovery pleadings;
3. To coordinate the examination of any and all witnesses in depositions;
4. To enter into stipulations with opposing counsel necessary for the conduct of this Action;
5. To coordinate the selection of counsel to act as spokesperson(s) at all pretrial conferences;
6. To call meetings of the Plaintiffs' counsel as they deem necessary and appropriate from time to time;
7. To coordinate all settlement negotiations with counsel for Defendants;
8. To coordinate and direct pretrial discovery proceedings, preparation for trial, and trial of this matter and delegate work responsibilities to selected counsel as may be required;
9. To coordinate the preparation and filings of all pleadings;
10. To prepare and distribute to the Plaintiffs periodic status reports;
11. To maintain adequate time and expense records covering services of all individuals in their offices and all members to whom tasks are delegated;
12. To assure that schedules are met and unnecessary expenditures of time and funds are avoided; and
13. To supervise all other matters concerning the prosecution of the claims asserted in the Action.

No motion, discovery request, or other pretrial proceedings shall be initiated or filed by any Plaintiffs without the approval of Lead Counsel, so as to prevent duplicative pleadings or discovery by Plaintiffs. No settlement negotiations shall be conducted without the approval of Lead Counsel.

Service upon any Plaintiff of all pleadings, motions, or other papers in the Action, except those specifically addressed to a Plaintiff other than Lead Plaintiff, shall be completed upon service of Lead Counsel. Service upon Lead Counsel is sufficient service except in the

following circumstances:

Defaults, Sanctions: Motions claiming default or seeking other penalties or sanctions against a party for failure to take some action within a time period measured from the date of service of a document MUST be served on counsel of record for that party as well as on Lead Counsel;

Case Specific Filings: Case specific filings (*i.e.*, papers that effect only a particular party or particular case – for example, a motion seeking to dismiss a party in a case or to remand a case to state court) MUST be served on counsel in that specific case, as well as on Lead Counsel.

Lead Counsel shall be the contact between Plaintiffs and Plaintiffs' counsel and Defendants' counsel, as well as the spokespersons for all Plaintiffs' counsel, and shall direct and coordinate the activities of Plaintiffs' counsel. Lead Counsel shall be the contact between the Court and Plaintiffs and their counsel.

The Clerk of Court shall copy each order to Lead Counsel for distribution as appropriate to counsel and parties. The Clerk shall also serve each order to all counsel who have registered for Electronic Service.

*Newly Filed or Transferred Actions*

The file in Case No. 1:23-CV-1520 shall constitute the master file for this Action and any other case that may be subsequently filed in this Court or transferred to this Court from another court. When a document being filed pertains to all such actions, the phrase "All Actions" shall appear immediately after the phrase "This Document Relates To:". When a pleading applies to some, but not all, of such actions, the document shall list, immediately after the phrase "This Document Relates To:", the Docket number for each individual action to which the document applies, along with the last name of the first-listed Plaintiff in said action.

When a case that arises out of the subject matter of this Action is hereinafter filed in this Court or transferred to this Court from another court, the Clerk of this Court shall:

1. File a copy of this *Order* in the separate file for such action;
2. Mail a copy of this *Order* to the attorneys for the Plaintiff(s) in the newly filed or transferred case and to any new Defendant(s) in the newly filed or transferred case; and
3. Make the appropriate entry in the Docket for this Action.

Each new case arising out of the subject matter of this Action that is filed in this Court or transferred to this Court shall be consolidated with this Action and this *Order* shall apply thereto, unless a party objecting to this *Order* or any provision of this *Order* shall, within ten (10) days after the date upon which a copy of this *Order* is served on counsel for such party, file an application for relief from this *Order* or any provision therein and this Court deems it appropriate to grant such application.

During the pendency of this litigation, or until further order of this Court, the parties shall take reasonable steps to preserve all documents within their possession, custody, or control, including computer-generated and stored information and materials such as computerized data and electronic mail, containing information that is relevant to or may lead to the discovery of information to the subject matter of the pending litigation.

IT IS SO ORDERED.

*/s/ Donald C. Nugent*  
DONALD C. NUGENT  
United States District Judge

DATED: December 26, 2023