

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In Re NORVERGENCE, INC.,

Debtor.

WANLAND & ASSOCIATES, INC., on
behalf of itself and all others similarly
situated,

Plaintiff,

v.

NORTEL NETWORKS LIMITED,
NORTEL NETWORKS, INC., QWEST
COMMUNICATIONS
INTERNATIONAL INC., THOMAS N.
SALZANO, ALEXANDER L. WOLF,
and ROBERT J. FINE,

Defendants.

Case No. 04-32079 (RG)

Adv. Proc. No. 05-2439

**JOINT NOTICE OF MOTION
FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

TO: All counsel on ECF list

PLEASE TAKE NOTICE that the undersigned, attorneys for plaintiff and the putative class and for defendants Nortel Networks Limited¹ and Nortel Networks, Inc., will jointly move before the United States Bankruptcy Court for the District of New Jersey, Hon. Rosemary Gambardella, U.S.B.J., on December 6, 2016, for an Order granting preliminary approval to a class action settlement reached by plaintiff with defendants Nortel Networks Limited and Nortel

¹ NNI and NNL, as the Settling Nortel Defendants, have mutually agreed that NNI shall file this notice of motion and the brief in support of the joint motion on behalf of the Settling Nortel Defendants and that such filing shall satisfy ¶2 of the Settlement requiring a joint filing of the preliminary approval motion by the parties to the Settlement.

Networks, Inc.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, movants will rely on the accompanying brief and Declaration of Lisa J. Rodriguez.

A proposed Order is submitted herewith.

Dated: November 15, 2016

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CERTIFICATION OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the foregoing documents were filed on November 15, 2016 via the electronic filing system of the Bankruptcy Court for the District of New Jersey, which will automatically serve the following upon all counsel of record:

1. Joint Notice of Motion for Preliminary Approval of Class Action Settlement;
2. Declaration of Lisa J. Rodriguez in Support of Joint Motion for Preliminary Approval of Class Action Settlement;
3. Brief in Support of Joint Motion for Preliminary Approval of Class Action Settlement;
4. Proposed Order Granting Preliminary Approval of Class Action Settlement

/s/ Susana Cruz Hodge
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