

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

*In re: Hi-Crush Partners L.P. Securities Litigation*

No. 12-Civ-8557 (CM)

**ECF Case**

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

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's September 16, 2014 Order Preliminarily Approving Proposed Settlements and Providing for Notice, and upon the Declaration of Ira M. Press in Support of Proposed Class Settlement, Plan of Allocation and Award of Attorneys' Fees and Expenses, dated November 14, 2014; the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses; and all other papers and proceedings herein, Lead Counsel will and do hereby move this Court on December 19, 2014, at 9:30 a.m. in the Courtroom of the Honorable Colleen McMahon, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for entry of an order awarding attorney's fees and authorizing reimbursement of litigation-related expenses to Plaintiffs' Lead Counsel.

Dated: November 14, 2014

KIRBY McINERNEY LLP

/s/ Ira M. Press

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