

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

FREDERICK BARTON DANNER,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

CAESARS ENTERTAINMENT
CORPORATION and CAESARS
ENTERTAINMENT OPERATING
COMPANY, INC.,

Defendants.

Case 1:14-cv-07973-SAS
[Rel. Case 1:14-cv-07091-SAS]
ECF Case

Oral Argument Requested

**NOTICE OF MOTION FOR CLASS CERTIFICATION AND
APPOINTMENT OF CLASS REPRESENTATIVE AND CLASS COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Gordon Z. Novod dated December 4, 2015, and the exhibits thereto, and all other papers and proceedings in this action, Plaintiff Frederick Barton Danner, individually and on behalf of all others similarly situated, by and through his counsel, will hereby move this Court, at a time and date to be determined, in Courtroom 15C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order, pursuant to Fed. R. Civ. P. 23 and the Local Rules of this Court, (i) certifying this action to proceed as a Class Action under Rules 23(a) and 23(b)(3) on behalf of the following class: all persons who beneficially owned 6.50% Senior Notes due 2016 from the date the right to payment was impaired, *i.e.*, January 15, 2015, through the date that the Court certifies the Class; (ii) appointing Plaintiff as the class representative; and (iii) appointing Gardy & Notis, LLP and

Grant & Eisenhofer P.A. as Class counsel, and for such other or further relief that the Court deems just and proper.

Dated: New York, New York
December 4, 2015

Respectfully submitted,

GRANT & EISENHOFER P.A.

By: /s/ Daniel L. Berger
Daniel L. Berger
Gordon Z. Novod
485 Lexington Avenue, 29th Floor
New York, New York 10017
Tel: 646-722-8500
Fax: 646-722-8501
Email: dberger@gelaw.com
gnovod@gelaw.com

-and-

GARDY & NOTIS, LLP

Mark C. Gardy
James S. Notis
Meagan Farmer
Tower 56
126 East 56th Street, 8th Floor
New York, New York 10022
Tel: 212-905-0509
Fax: 212-905-0508
Email: mgardy@gardylaw.com
jnotis@gardylaw.com
mfarmer@gardylaw.com

Attorneys for Plaintiff and the Proposed Class