

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

IN RE: LOESTRIN 24 FE ANTITRUST  
LITIGATION

MDL NO. 2472

THIS DOCUMENT RELATES TO:  
  
DIRECT PURCHASER ACTIONS

Master File No. 1:13-md-2472-WES-PAS

**DIRECT PURCHASER CLASS PLAINTIFFS' UNOPPOSED MOTION FOR AN  
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND  
SERVICE AWARD FOR THE CLASS REPRESENTATIVE**

Pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, class counsel for the direct purchaser class plaintiffs respectfully move for entry of an order:

1. Approving direct purchaser class counsel's request for reimbursement of their reasonable litigation expenses, totaling \$3,965,558;
2. Awarding class counsel a fee award of 33<sup>1</sup>/<sub>3</sub>% of the net settlement amount (one-third of \$120 million settlement minus the requested litigation expenses), totaling \$38,678,147, plus interest on that amount that may accrue prior to distribution; and
3. Awarding class representative Ahold USA, Inc. a \$100,000 service award in recognition of its participation in this case and the time and effort it expended on behalf of the class.

In support of this motion, the direct purchasers rely upon the accompanying Memorandum of Law, Declaration of Co-Lead Counsel Peter R. Kohn (and the exhibits thereto), and Declaration of Brian T. Fitzpatrick.

A proposed order will be submitted to the Court as part of the direct purchasers' materials

in support of their motion for final approval of the settlement and entry of final judgment, due August 13, 2020.

Dated: April 20, 2020

Respectfully submitted,

/s/ Thomas M. Sobol  
Thomas M. Sobol (R.I. Bar No. 5005)  
Kristen A. Johnson (*pro hac vice*)  
Laura Hayes (*pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
55 Cambridge Parkway, Suite 301  
Cambridge, MA 02142  
Telephone: (617) 482-3700  
Facsimile: (617) 482-3003  
tom@hbsslaw.com  
kristenj@hbsslaw.com  
lhayes@hbsslaw.com

David F. Sorensen (*pro hac vice*)  
Ellen T. Noteware (*pro hac vice*)  
Aurelia Chaudhury (*pro hac vice*)  
BERGER MONTAGUE PC  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4604  
dsorensen@bm.net  
enoteware@bm.net  
achaudhury@bm.net

Daniel J. Walker (*pro hac vice*)  
BERGER MONTAGUE PC  
2001 Pennsylvania Ave, NW, Suite 300  
Washington, DC 20006  
Telephone: (202) 559-9745  
dwalker@bm.net

Joseph H. Meltzer (*pro hac vice*)  
Terence S. Ziegler (*pro hac vice*)  
KESSLER TOPAZ MELTZER & CHECK LLP  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
Facsimile: (610) 667-7056

[jmeltzer@ktmc.com](mailto:jmeltzer@ktmc.com)  
[tziegler@ktmc.com](mailto:tziegler@ktmc.com)

Peter R. Kohn (*pro hac vice*)  
Neill W. Clark (*pro hac vice*)  
FARUQI & FARUQI LLP  
1617 JFK Boulevard, Suite 1550  
Philadelphia, PA 19103  
Telephone: (215) 277-5770  
Facsimile: (215) 277-5771  
[pkohn@faruqilaw.com](mailto:pkohn@faruqilaw.com)  
[nclark@faruqilaw.com](mailto:nclark@faruqilaw.com)

David C. Calvello (*pro hac vice*)  
FARUQI & FARUQI LLP  
685 Third Avenue, 26th Floor  
New York, NY 10017  
Telephone: (212) 983-9330  
Facsimile: (212) 983-9331  
[dcalvello@faruqilaw.com](mailto:dcalvello@faruqilaw.com)

*Co-Lead Counsel for the Direct Purchaser  
Class Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Thomas M. Sobol, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access these filings, and notice of these filings will be sent to those parties by operation of the CM/ECF system.

Dated: April 20, 2020

/s/ Thomas M. Sobol  
Thomas M. Sobol (R.I. Bar No. 5005)