

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

<p>PRECISION ASSOCIATES, INC., <i>et al.</i>,</p> <p>Plaintiffs,</p> <p>v.</p> <p>PANALPINA WORLD TRANSPORT (HOLDING) LTD., <i>et al.</i></p> <p>Defendants.</p>	<p>CASE NO. 08-CV-00042 (JG)(VVP)</p> <p>(Oral Argument Requested)</p>
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**CO-LEAD COUNSEL'S NOTICE OF MOTION FOR A THIRD
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE THAT Plaintiffs will move this Court, before the Honorable Brian M. Cogan, United States District Judge, at the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on Friday, November 4, 2016, at 10:00 A.M., for an order granting the following relief.

Plaintiffs will respectfully move the Court for its Order awarding interim attorney's fees and expenses as follows:

- (1) awarding as attorneys' fees totaling \$29,443,654.19, or 25% of the Current Available Settlement Fund of \$117,774,616.77, to be paid immediately from funds currently paid into the Settlement Fund;
- (2) reimbursing Class Counsel for interim litigation expenses totaling \$1,762,803.75;
and
- (3) awarding as attorneys' fees a maximum future-looking award of \$22,500,000.00, or 25% of the Future Available Settlement Fund up to a cap of \$90,000,000.00 in

future deposits, to be paid upon each such future contribution to the Settlement Fund.

Dated: September 1, 2016

Respectfully submitted,

s/ W. Joseph Bruckner

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