

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

PRECISION ASSOCIATES, INC., et al., on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., et al.,

Defendants.

Case No.: 08-CV-00042 (JG) (VVP)

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF THE THIRD
ROUND OF SETTLEMENTS AND PLAN OF ALLOCATION**

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TO THE COURT AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the Court will hold a hearing on November 4, 2016 at 11:00 A.M. at the United States District Court, 225 Cadman Plaza East, Brooklyn, New York, 11201 to consider whether to finally approve the third round of settlements in this litigation, which comprises two proposed class action settlements with the DHL Defendants and the Hellmann Defendants, and the proposed Plan of Allocation. Please take further notice that the Court may adjourn or continue such hearing to a later date and any such continuances or adjournments will also be posted on www.freightforwardcase.com.

Plaintiffs move the Court for entry of an order finally approving the two Proposed Settlements, constituting a cumulative Settlement Fund of \$53,550,000. In support of their Motion, Plaintiffs submit a Memorandum of Law, the two Proposed Settlements (Exhibits 1-2), the proposed Plan of Allocation (Ex. 3), and the Declarations of Julie Redell and Katherine Kinsella. Plaintiffs also submit two proposed orders for final approval and judgment, attached to this Notice.

The two Proposed Settlements and the Plan of Allocation should be finally approved because the settlements are “fair, reasonable, and adequate.” Fed. R. Civ. P. 23(e). The \$53,550,000 Settlement Fund represents an excellent recovery for the Class. No objections to any of the Settlements have been filed or received and only one putative Class Members has opted out. This Court should finally approve the two Proposed Settlements.

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Dated: October 7, 2016

Respectfully Submitted,

/s/ Steven N. Williams

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