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August 13, 2013

Via ECF and Personal Delivery

The Honorable John Gleeson
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. 727S
Brooklyn, NY 11201

RE: *Precision Associates, Inc., et al. v. Panalpina World Transport (Holding) Ltd. et al.*, Case No. 08-CV-0042 (JG) (VVP)

Dear Judge Gleeson:

Enclosed with this letter and served on all parties via ECF is a modified proposed order granting Co-Lead Counsel's petition for interim payment of attorneys' fees and reimbursement of expenses. The proposed order, included with this letter, replaces the proposed order submitted with Plaintiffs' Motion for Attorneys' Fees on June 12, 2013. *See* ECF No. 835, Attachment 1. We will also deliver a word processing version of this order to the Court.

On August 9, 2013, this Court held a hearing for final approval of ten (10) proposed class settlements in this complex antitrust class action. ECF No. 863. Of the ten settlements, only three settlements have been the subject of objections (only one has been objected to by Class Members). HP and Dell have objected to final approval of the Schenker settlement. ECF Nos. 842, 843. The non-settling Japanese Defendants have objected to final approval of the Vantec and Nishi-Nippon settlements. ECF No. 841. Plaintiffs believe all of these objections lack merit and should be rejected. However, in light of the fact that Class Counsel has vigorously litigated this case for over five years, the enclosed proposed order permits this Court to: (1) finally approve the settlements for which there has been no objection and (2) order disbursement of expenses and attorneys' fees in the amount of 33% for each settlement that has been finally approved and not appealed. *See* Enclosed ¶ 5, pgs. 3-4.

Plaintiffs would also like to remind the Court of the letter submitted by Class Counsel on June 20, 2013 and subsequently "so ordered" by this Court. *See* ECF Nos. 840. In order to ensure compliance with the settling Defendants' CAFA notice requirements, Plaintiffs informed the Court that it could proceed with signing a final approval order with respect to the EGL and Expeditors' settlements. With respect to the remaining eight settlements, in order to comply with the 90-day CAFA notice requirement, this Court should defer entering an order until September 2, 2013.

LAW OFFICES
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Honorable John Gleeson
August 13, 2013
Page 2

Thank you very much for your attention to this matter.

Respectfully Submitted,

/s/ Steven N. Williams
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Interim Class Counsel for Plaintiffs

cc: All Counsel of Record (via ECF)