

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

PRECISION ASSOCIATES, INC.;  
ANYTHING GOES LLC d/b/a MAIL BOXES  
ETC., and JCK INDUSTRIES, INC., 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)**

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF THE SECOND  
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 2, 2015 at 10:00 A.M. at the United States District Court, 225 Cadman Plaza East, Brooklyn, New York, 11201 to consider whether to finally approve the eleven proposed class action settlements and the 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](http://www.freightforwardcase.com).

Plaintiffs move the Court for entry of an order finally approving the eleven Proposed Settlements, constituting a cumulative Settlement Fund of \$197,623,497.87.<sup>1</sup> In support of their Motion, Plaintiffs submit a Memorandum of Law, charts outlining the settlement amounts and various recoveries (Exhibits 1-2), the eleven Proposed Settlements (Exhibits 3-13), the proposed Plan of Allocation (Ex. 14), and the Declarations of Katherine Kinsella and Julie Redell. Plaintiffs also submit eleven proposed orders for final approval and judgment, attached to this Notice.

The eleven 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 \$197,623,497.87 Settlement Fund represents an excellent recovery for the Class. No objections to any of the Settlements have been filed or received and only six putative Class Members have opted out. This Court should finally approve the eleven Proposed Settlements.

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<sup>1</sup> This Settlement Fund will increase as a result of assignments the Class received from Settling Defendants’ receipt of settlement money from the litigation, *In re Air Cargo Shipping Services Antitrust Litigation*, No. 06-MD-1775 (JG) (VVP) (E.D.N.Y.) (“*Air Cargo*”).

Dated: October 5, 2015

Respectfully Submitted,

/s/ Steven N. Williams

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