

**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>
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**PLAINTIFFS' NOTICE OF MOTION FOR A SECOND INTERIM
AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE THAT Plaintiffs will move this Court, before the Honorable John Gleeson, United States District Judge, at the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, on Monday, November 2, 2015, 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 \$42,246,681.08, or 25% of the Total Available Settlement Fund of \$168,986,724.33, to be paid as follows:
 - a. \$40,684,181.08, to be paid immediately from funds currently paid into the Settlement Fund;
 - b. \$250,000.00, to be paid upon Final Approval of the Geodis settlement from the final portion of the settlement proceeds (\$1,000,000.00) scheduled to be paid into the Settlement Fund by Geodis at that time;

- c. \$1,250,000.00, to be paid fifteen days after Final Approval of the Agility settlement, or on January 4, 2016, whichever is later, from the final portion of the settlement proceeds (\$5,000,000.00) scheduled to be paid into the Settlement Fund by Agility at that time; and
 - d. \$62,500.00, to be paid on May 8, 2016, from the final portion of the settlement proceeds (\$250,000) scheduled to be paid into the Settlement Fund by Jet Speed at that time; and
- (2) reimbursing Class Counsel for interim litigation expenses totaling \$4,046,323.05.

Dated: September 3, 2015

Respectfully submitted,

s/ W. Joseph Bruckner

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