

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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IN RE: PROPULSID PRODUCTS : **MDL NO. 1355**
LIABILITY LITIGATION :
: **SECTION: L**
: **JUDGE FALLON**
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This Document Relates to: :
All cases :
: _____

**THE PLAINTIFFS’ STEERING COMMITTEE’S
MOTION FOR DISTRIBUTION OF ADDITIONAL
ATTORNEY’S FEES AND REIMBURSEMENT OF
COSTS (RE: MDL SETTLEMENT PROGRAM I)**

NOW COMES, Russ M. Herman, Plaintiffs’ Liaison Counsel, on behalf of the the Plaintiffs’ Steering Committee in this MDL who moves the Court as follows:

I.

The Plaintiffs’ Steering Committee hereby submits a motion for an additional award of attorney’s fees and reimbursement of costs derived from the Propulsid MDL Settlement Program

I.

II.

The members of the Plaintiffs’ Steering Committee and others substantially contributed to the successful settlement reached in this matter and will continue to contribute towards efforts in this matter.

III.

The recommendation for distribution of attorney’s fees in connection with this motion

includes review by Special Master, Patrick A. Juneau.

IV.

Movant seeks an Order authorizing Russ M. Herman on behalf of the Plaintiffs' Steering Committee, together with Special Master, Patrick A. Juneau, to make an additional distribution for legal fees and costs from the Fee Fund of MDL 1355 in accordance with a schedule detail of payout presented to the Court in advance of a hearing date, which schedule has been previously reviewed by the Plaintiffs' Steering Committee and the Special Master.

V.

Special Master, Patrick A. Juneau, has consented to the filing of this motion.

Respectfully submitted,

/s/ Leonard A. Davis

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LIAISON COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing has been served on Liaison Counsel, James Irwin, by U. S. Mail and e-mail or by hand delivery and e-mail and upon all parties electronically by uploading the same to Lexis-Nexis File and Serve in accordance with Pre-Trial Order No. 4, and that the foregoing was electronically filed with the Clerk of Court of the United States District Court for the Eastern District of Louisiana by using the CM/ECF system which will send a Notice of Electronic Filing in accord with the procedures established in MDL 1355 on this 15th day of March, 2012.

/s/ Leonard A. Davis

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