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15 *Lead Counsel for Commercial Food*
16 *Preparer Plaintiff Class*

17 **UNITED STATES DISTRICT COURT**
18 **SOUTHERN DISTRICT OF CALIFORNIA**

19 IN RE: PACKAGED SEAFOOD
20 PRODUCTS ANTITRUST LITIGATION

21 This Document Relates To:

22 All Commercial Food Preparer
23 Plaintiff Actions

Case No. 15md2670 DMS(MSB)

24 **NOTICE OF MOTION AND**
25 **MOTION FOR ATTORNEYS'**
26 **FEES AND COSTS**

27 DATE: November 15, 2024
28 TIME: 1:30 p.m.
JUDGE: Hon. Dana M.
COURT: Sabraw
13A (13th floor)

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that on November 15, 2024, at 1:30 p.m., counsel
4 for the Commercial Food Preparer Plaintiffs (“CFPs”), who represent a certified class
5 of indirect purchasers of Foodservice-Size Packaged Tuna Products, will move the
6 Court for an order approving a motion for attorneys’ fees and costs. Pursuant to
7 Federal Rules of Civil Procedure 23(h) and 54(d)(2), counsel for the CFPs request:

- 8 1) A 29% fee award of \$3,008,750;
- 9 2) Reimbursement of prior litigation costs and expenses of \$514,886.31;
- 10 3) Payment of costs associated with class notice and settlement administration
11 of \$396,838.08 to Kroll Settlement Administration; and
- 12 4) Service awards of \$2,000 to each class representative, totaling \$36,000.

13 This Motion is based on the accompanying memorandum of points and authorities,
14 the declarations of Michael J. Flannery and Class Counsel, and the record in this case.
15

16 Dated: August 15, 2024

/s/ Michael J. Flannery

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*Lead Counsel for Commercial Food
Preparer Plaintiff Class*

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1 **CERTIFICATE OF SERVICE**

2 I certify that on August 15, 2024, I filed the foregoing document with the
3 Clerk of the Court for the United States District Court, Southern District of
4 California, by using the Court’s CM/ECF system, and also served counsel of record
5 via this Court’s CM/ECF system.

6 */s/ Michael J. Flannery*
7 _____
8 Michael J. Flannery