

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

In Re: PARKING HEATERS ANTITRUST LITIGATION	Case No. 15-MC-940 (DLI) (JO)
THIS DOCUMENT RELATES TO: <i>All Direct Purchaser Class Actions</i>	

**NOTICE OF MOTION OF DIRECT PURCHASER PLAINTIFFS
FOR AN AWARD OF ATTORNEYS’ FEES, REIMBURSEMENT OF
EXPENSES, AND INCENTIVE AWARDS TO NAMED PLAINTIFFS**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Direct Purchaser Plaintiffs’ Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Incentive Awards to Named Plaintiffs, and the related declarations and exhibits thereto, Plaintiffs Triple Cities Acquisition LLC d/b/a Cook Brothers Truck Parts, National Trucking Financial Reclamation Services, LLC, TrailerCraft Inc., and Myers Equipment Corporation (collectively, “Direct Purchaser Plaintiffs” or “DPPs”) will move this Court on January 9, 2019, before the Honorable James Orenstein, United States Magistrate Judge, at the United States Courthouse, 225 Cadman Plaza East, Courtroom 11D South, Brooklyn, New York, for an order:

- (A) granting DPP’s request for an award of attorneys’ fees, ranging from \$3,250,000 to \$4,066,667, which represents 33-1/3% of what will be the total settlement amount from settlements with defendants Webasto Products North America, Inc., Webasto Thermo & Comfort North America, Inc., and Webasto Thermo & Comfort SE (collectively, “Webasto”) and Eberspaecher Climate Control Systems GmbH & Co. KG, Espar, Inc.,

and Espar Products Inc. (collectively, “Espar,” and with Webasto, “Defendants”);¹

- (B) granting DPP’s request for reimbursement of \$155,275.52 in expenses;
- (C) awarding Class Representatives Triple Cities Acquisition LLC d/b/a Cook Brothers Truck Parts, National Trucking Financial Reclamation Services, LLC, TrailerCraft Inc., and Myers Equipment Corporation \$15,000 each as an incentive award for their work in this matter; and
- (D) authorizing Co-Lead Class Counsel to pay out of the Settlement Fund sums actually invoiced by Epiq Systems, Inc., the Settlement Administrator, for notice and administration.

A proposed order is submitted herewith.

Dated: November 1, 2018

Respectfully submitted,

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¹ The precise amount of the settlement with Webasto may change because the total settlement amount of \$7 million can be reduced depending on the number of members of the Settlement Class who opt out of the Webasto settlement. See ECF No. 146-2, Ex. 1 (Webasto Settlement) at ¶ 33. Once the amount of the reduction is calculated, which will occur shortly after the December 1, 2018 opt-out deadline, DPPs will inform the Court of the precise amount that is equal to 33-1/3% of the total settlement amount with both Defendants.

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On behalf of Direct Purchaser Plaintiffs and the Settlement Class