

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: RAILWAY INDUSTRY	)	Master Docket Misc. No. 18-798
EMPLOYEE NO-POACH ANTITRUST	)	
LITIGATION	)	MDL No. 2850
	)	
This Document Relates to:	)	
ALL ACTIONS	)	

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS**

Plaintiffs hereby respectfully move the Court for an Order approving (1) Class Counsel's request for one-third of the Settlement Fund in attorneys' fees; (2) Class Counsel's request for reimbursement of \$712,012.40 in out-of-pocket litigation costs and approximately \$105,000 for the Settlement Administrator; and, (3) the Class Representatives' request for service awards of \$15,000 each, for a total of \$75,000.

In further support of this Motion, Plaintiffs submit the accompanying memorandum of law, and the declarations of Dean M. Harvey, Roberta Liebenberg, Stephen Baldassano, John Brand, David Escalera, Brian Lara, and Patricia Lonergan, and all exhibits attached thereto. Filed concurrently with this motion are also declarations from 22 participating law firms concerning their respective time and expense reports.

Class Counsel respectfully request that their Motion be granted.

Dated: May 4, 2020

Respectfully submitted,

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*Class Counsel*

*/s/ Kelly K. Iverson*

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*Liaison Counsel for Plaintiffs and the  
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