

**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’ NOTICE OF ERRATA RE: MOTION FOR ATTORNEY’S FEES,
COSTS, AND SERVICE AWARDS**

After filing their Motion for Attorney’s Fees, Costs, and Service Awards (Dkt. 270), Plaintiffs learned that the expense and time reports of two participating law firms had inadvertently been excluded from the submission to the Court. Plaintiffs have reviewed the additional records to determine which time entries and expense reimbursement requests meet the guidelines discussed in Plaintiffs’ memorandum of law. *See* Dkt. 271 at 14. The new total lodestar and expense amounts do not materially affect Plaintiffs’ analysis or request. Plaintiffs attach hereto revised and corrected copies of the following documents.

1. Exhibit B to the Declaration of Dean M. Harvey (Dkt. 272-2). This Chart now includes eligible time reported by participating law firm Gustafson Gluek PLLC. Based on this addition, the total estimated lodestar for work performed after the appointment of Interim Co-Lead Counsel discussed on page 14 of Plaintiffs’ brief (Dkt. 271) should be “approximately 12,079 hours, incurring a total lodestar of \$6,944,309.55,” instead of what the brief currently states, “12,073 hours, incurring a total lodestar of \$6,940,874.55.” This change does not affect the estimated lodestar multiplier of 2.35 on page 15 of the brief.

The total estimated lodestar including work performed *before* the appointment of Interim Co-Lead Counsel discussed on footnote 4 on page 15 of the brief should now read

“\$7,874,337.55 based on approximately 13,668.14 hours of work, for a multiplier of 2.07,” instead of what the brief currently states, “\$7,851,912.55 based on approximately 13,631.24 hours of work, for a multiplier of 2.08.” This change does not materially affect the lodestar analysis.

2. Exhibit E to the Declaration of Dean M. Harvey (Dkt. 272-5). This chart has been revised to include eligible reimbursements requested by Gustafson Gluek PLLC and Shapiro Sher. Based on these revisions, Plaintiffs’ total reimbursable expenses are \$718,279.40, not \$712,012.40 as stated in Plaintiffs’ motion and supporting brief, in the May 4, 2020 Declaration of Dean M. Harvey, and in the proposed order previously submitted to the Court. This correction does not materially affect Plaintiffs’ request for reimbursement.

3. Proposed Order. Plaintiffs’ proposed order has been revised to reflect the corrected amount of total reimbursable expenses of \$718,279.40.

Dated: May 13, 2020

Respectfully submitted,

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