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10 *Class Counsel for the Direct Purchaser Class*

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 12 **UNITED STATES DISTRICT COURT**
 13 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

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 16 **IN RE: PACKAGED SEAFOOD
 PRODUCTS ANTITRUST
 LITIGATION**

Case No. 3:15-md-02670-DMS-MDD
 MDL No. 2670

**DIRECT PURCHASER
 PLAINTIFFS’ NOTICE OF
 MOTION AND MOTION FOR
 ATTORNEYS’ FEES AND
 COSTS AND SERVICE AWARDS
 FOR THE CLASS
 REPRESENTATIVES IN
 CONJUNCTION WITH THE
 COSI/TUG SETTLEMENT**

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 20 This filing relates to the Direct
 21 Purchaser Plaintiff Class Action
 22 Track

DATE: June 17, 2022
 TIME: 1:30 PM
 JUDGE: Dana M. Sabraw
 CTRM: 13A

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

3 **PLEASE TAKE NOTICE** that, on June 17, 2022 at 1:30 pm in Courtroom
4 13A of the United States District Court, Southern District of California, located at 333
5 West Broadway, San Diego, CA 92101, the Direct Purchaser Plaintiffs (“DPPs”) in
6 the above-captioned action, will and hereby do move for the Court for an award of
7 costs and attorneys’ fees for Class Counsel in conjunction with its ruling on final
8 approval of the class action settlement between the DPPs and Defendants Tri-Union
9 Seafoods LLC d/b/a Chicken of the Sea (“COSI”) and its parent company, Thai Union
10 Group (“TUG”). The DPPs also seek modest incentive awards of \$5,000 for each of
11 the Class Representatives from the settlement fund for their service in this case.

12 This Motion is based on the accompanying Memorandum of Points and
13 Authorities and the supporting declaration of Samantha J. Stein—including Exhibit B
14 to that Declaration, which is the arbitration decision on fees and costs issued by former
15 federal Judge Layn Phillips, who presided over that contested arbitration between the
16 DPPs and COSI/TUG on June 22, 2021—as well as the record and any further briefing
17 in this matter, and the arguments at the hearing of this Motion, if any. A proposed
18 order is being submitted contemporaneously with this Motion, and the Motion and
19 supporting papers will be posted to the dedicated settlement website.

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21 Dated: March 24, 2022

Respectfully submitted,

22 By: *s/ Michael P. Lehmann*
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*Class Counsel for the Direct Purchaser
Class*

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CERTIFICATE OF SERVICE

I certify that on March 24, 2022, I filed the foregoing document and supporting papers with the Clerk of the Court for the United States District Court, Southern District of California, by using the Court’s CM/ECF system. I also served counsel of record via this Court’s CM/ECF system.

By: s/ Michael P. Lehmann
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*Class Counsel for the Direct
Purchaser Class*