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*Class Counsel for the Direct Purchaser Plaintiffs*

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

IN RE: PACKAGED SEAFOOD  
PRODUCTS ANTITRUST  
LITIGATION

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This document relates to:

All Direct Purchaser Plaintiff  
Actions

Case No. 3:15-md-02670-DMS  
(MSB)

**DIRECT PURCHASER  
PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR  
AN AWARD OF ATTORNEYS'  
FEES AND REIMBURSEMENT  
OF LITIGATION EXPENSES**

DATE: November 22, 2024  
TIME: 1:30 P.M.  
JUDGE: Dana M. Sabraw  
CTRM: 13A

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

3 **PLEASE TAKE NOTICE** that on November 22, 2024 at 1:30 p.m., Plaintiffs  
4 Olean Wholesale Grocery Cooperative, Inc., Pacific Groservice Inc. d/b/a PITCO  
5 Foods, Piggly Wiggly Alabama Distributing Co., Inc., Gregg Szilagyi as Trustee in  
6 Bankruptcy for Central Grocers, Inc., Trepeco Imports and Distribution Ltd., and  
7 Benjamin Foods LLC (collectively, the “Direct Purchaser Plaintiffs” or “DPPs”) will  
8 move the Court for an award of attorneys’ fees and reimbursement of litigation  
9 expenses for DPP Class Counsel in conjunction with its ruling on final approval of the  
10 proposed class action settlements between DPPs and Defendants StarKist Co. and  
11 Dongwon Industries Co., Ltd. and Defendants Lion Capital LLP, Lion Capital (Americas),  
12 Inc., and Big Catch Cayman LP. DPPs also seek modest incentive awards of \$12,500  
13 for each of the Class Representatives from the settlement fund for their service in this  
14 case.

15 This Motion is based on the accompanying Memorandum of Points and  
16 Authorities, the supporting declarations, the record and any further briefing in this  
17 matter, and the arguments at the hearing of this Motion, if any. A proposed order is  
18 being submitted contemporaneously with this Motion and the Motion and supporting  
19 papers will be posted to the dedicated settlement website.

20 Dated: October 4, 2024

Respectfully submitted,

21 By: /s/ Erika A. Inwald  
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