

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE INTUNIV ANTITRUST  
LITIGATION

This Document Relates to:  
*Direct Purchaser Actions*

Civil Action No. 16-cv-12653-ADB

**DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR AN AWARD OF  
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS  
FOR THE CLASS REPRESENTATIVES**

Pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, the direct purchaser class plaintiffs respectfully move for entry of an order:

1. Approving direct purchaser class counsel's request for reimbursement of their reasonable litigation expenses incurred since October 1, 2020, totaling \$795,204.50;
2. Awarding class counsel attorneys' fees of one-third of the settlement fund, net of litigation expenses and administration costs, totaling \$19,056,607.76  $((\$58,000,000.00 - \$795,204.50 - \$34,972.23) \div 3)$ , plus any interest on that amount that may accrue prior to distribution; and
3. Approving service awards of (i) \$50,000 for Meijer, Inc and Meijer Distribution, Inc. and (ii) \$10,000 for QK Healthcare, Inc. in recognition of their participation in this case on behalf of the class.

In support, the direct purchasers rely on the accompanying Memorandum of Law and supporting declarations and exhibits. A proposed order will be submitted to the Court with the direct purchasers' motion for final approval of the Shire settlement.

Dated: August 22, 2024

Respectfully submitted,

/s/ Thomas M. Sobol

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*Additional Counsel for the Direct Purchaser Class*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, the foregoing document was served by filing it on the Court's CM/ECF system, which will deliver notification of filing to all counsel of record.

Dated: August 22, 2024

/s/ Thomas M. Sobol  
Thomas M. Sobol