

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

SIDNEY REID, ALISHA BARNETT, DAWN
DAMROW and FRAN PENNELL, et al., on
Behalf of Themselves and all Others Similarly
Situated,

Plaintiffs,

v.

UNILEVER UNITED STATES, INC., LEK,
INC., and CONOPCO, INC. d/b/a UNILEVER
HOME AND PERSONAL CARE USA,

Defendants.

1:12-cv-06058

Hon. Rubén Castillo

**AGREED MOTION FOR AWARD OF
FINAL SUPPLEMENTAL ATTORNEYS' FEES AND COSTS**

Pursuant to Local Rule 54.3 of the Northern District of Illinois, after extensive negotiation with counsel for Defendants, Plaintiffs' Counsel seek an award of final supplemental attorneys' fees and costs for work performed on behalf of the certified Class. Defendants Unilever United States, Inc. and Conopco, Inc. (collectively, "Unilever") agree that the figures negotiated by the parties meet the standards confirmed by this Court's June 10, 2015 Memorandum Opinion and Order (Dkt. No. 213) (the "Initial Fee Award").

Accordingly, the parties present this Agreed Motion for Final Supplemental Attorneys' Fees and Costs, and request that the Court award \$322,200.30 in final, supplemental fees and \$5,467.27 in final, supplemental costs, in compensation for Plaintiffs' Counsel's time and expenses after July 31, 2014. In support of this Agreed Motion, the parties state as follows:

1. This Court entered a Final Approval Order in this matter on July 29, 2014 (Dkt. No. 143), which was affirmed by the Seventh Circuit on April 18, 2016 (Dkt. No. 220). The Seventh Circuit rejected entirely the challenges raised by an objector, Tina Martin.

2. As the Seventh Circuit noted with approval, under the structure of the Settlement Agreement, Class Counsel's fees are to be paid by Unilever separately, and do not draw from the \$10.25 million fund established for potential settlement payments to class members.

3. The Final Approval Order therefore expressly reserved jurisdiction over the later determination of the amount of attorneys' fees and costs to be awarded to Plaintiffs' Counsel. (Dkt. 143, Par. 11). After extensive briefing, the Court issued a 54-page memorandum and order, granting in part and denying in part Class Counsel's request for fees and costs through July 2014. The Court awarded Plaintiffs' Counsel \$1,503,285.41 in fees, and \$36,069.52 in costs and expenses, for a total of \$1,539,354.93. (Dkt. No. 213).

3. Plaintiffs' Counsel incurred additional fees and expenses for the work required by the appeal and for ongoing coordination with the Special Master and the Settlement Administrator, who have now made their final determination of the award amounts for individual class members. Plaintiffs' Counsel provided their lodestar numbers and supporting *pro formas* to counsel for Unilever, using the hourly rates set by the Court in the Initial Fee Award. In compliance with Local Rule 54.3, counsel for the parties then met and conferred, and ultimately reached the agreed adjusted figures set forth in the chart attached as Exhibit A to this Motion. Plaintiffs' Counsel have agreed that the Exhibit A numbers represent their final request for fees in this matter.

4. Accordingly, counsel for the parties request that the Court award \$322,200.30 in final, supplemental fees and \$5,467.27 in final, supplemental costs to Plaintiffs' Counsel, as follows:

- a. \$61,176.40 to Miller Law LLC;
- b. \$68,120 in fees and \$1,338.48 in costs to the Law Office of Jana Eisinger, PLLC;

- c. \$186,921.40 in fees and \$4,128.79 in costs to Peter Safirstein and Chris Polaszek, formerly of Morgan & Morgan; and
- d. \$5,982 in fees to The Getty Law Group, PLLC.

Dated: July 13, 2016

Respectfully submitted,

Counsel for Plaintiffs

Counsel for Defendants

Unilever United States, Inc., and Conopco, Inc.

/s/ Marvin A. Miller

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CERTIFICATE OF SERVICE

I Marvin A. Miller hereby certify that on July 14, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Marvin A. Miller

Marvin A. Miller