

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

DOUGLAS S. CHABOT, et al.,)	Civ. Action No. 1:18-cv-02118-JPW
Individually and on Behalf of All)	
Others Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiffs,)	LEAD COUNSEL’S MOTION FOR
)	ATTORNEYS’ FEES AND
vs.)	LITIGATION EXPENSES, AND
)	AWARDS TO LEAD PLAINTIFFS
WALGREENS BOOTS ALLIANCE,)	PURSUANT TO 15 U.S.C. §78u-4(a)(4)
INC., et al.,)	
)	
Defendants.)	
)	
_____)	

Lead Counsel respectfully moves the Court for an order awarding attorneys' fees and litigation expenses, and for awards to Lead Plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4) in connection with their representation of the Class.

In support of this motion, Lead Counsel submits herewith the Memorandum of Law in Support of Motion for Attorneys' Fees and Litigation Expenses, the Declaration of David A. Knotts in Support of Settlement Motions, the Declaration of Ross D. Murray, Lead Counsel's Declaration, and the Declarations of Lead Plaintiffs.

Proposed orders will be submitted with Lead Counsel's reply submission on or before January 31, 2024, after the objection deadline for Class Members to object to the motion for fees and expenses has passed.

DATED: January 3, 2024

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
RANDALL J. BARON
A. RICK ATWOOD, JR.
DAVID A. KNOTTS
TEO A. DOREMUS

A handwritten signature in black ink, appearing to be 'DAVID A. KNOTTS', written over a horizontal line.

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Local Counsel

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on January 3, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ David A. Knotts

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Mailing Information for a Case 1:18-cv-02118-JPW Chabot et al v. Walgreens Boots Alliance, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Mason Capital Master Fund, L.P.

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Recovery Master, LLC

,

Pursuant to Local Rule 7.1, I, David A. Knotts, Esq., do hereby certify that the Settling Parties' (Lead Plaintiffs and Defendants) positions regarding the subject matter of the Motion for Attorneys' Fees and Litigation Expenses, and Awards to Lead Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4) ("Fee and Expense Request") are memorialized in the Stipulation of Settlement dated October 18, 2023 (ECF 307-1) (the "Stipulation"). As reflected in the Stipulation section regarding "Plaintiffs' Counsel's Attorneys' Fees and Expenses," Defendants took no position as to the substance or amount of any fee or expense request and "Defendants and their Related Persons shall have no responsibility for, and no liability whatsoever with respect to, any payment to Lead Counsel from the Settlement Fund or the allocation among Plaintiffs' Counsel, and/or any other Person who may assert some claim to any fees or expenses awarded by the Court." *See* Stipulation, ¶6.6.

DATED: January 3, 2024

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