

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

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**IN RE: PROPULSID PRODUCTS** : **MDL NO. 1355**  
**LIABILITY LITIGATION** :  
: **SECTION: L**  
: **JUDGE FALLON**  
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**This Document Relates to:** :  
**All cases** :  
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**MOTION FOR DISTRIBUTION OF  
ATTORNEY’S FEES (RE: MDL SETTLEMENT PROGRAM II)**

NOW COMES, Russ M. Herman, Plaintiffs’ Liaison Counsel (“PLC”), who moves the Court as follows:

I.

PLC hereby submits a motion for an award of attorney’s fees derived from the Propulsid MDL Settlement Program II.

II.

PLC, the State Federal Liaison, Dawn Barrios, and others substantially contributed to the successful settlement reached in MDL Settlement Program II and all have substantially contributed to the successful resolution of MDL Settlement Program II.

III.

PLC submits that a distribution of attorney’s fees is appropriate at this time.

IV.

The recommendation for distribution of attorney's fees in connection with this motion includes review by Special Master, Patrick A. Juneau.

V.

Movant seeks an Order authorizing Russ M. Herman, PLC, together with Special Master, Patrick A. Juneau, to make a distribution for legal fees and costs from the Attorney Fund/Fee Fund for Propulsid II in MDL 1355 in accordance with a schedule detail of payout presented to the Court in advance of a hearing date, which schedule has been previously reviewed by a Fee Committee, State Federal Liaison and the Special Master.

VI.

Special Master, Patrick A. Juneau, has consented to the filing of this motion.

Respectfully submitted,

/s/ Leonard A. Davis

**RUSS M. HERMAN, T.A. (La. Bar #6819)**

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**LIAISON COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that the above and foregoing has been served on Liaison Counsel, James Irwin, by U. S. Mail and e-mail or by hand delivery and e-mail and upon all parties electronically by uploading the same to Lexis-Nexis File and Serve in accordance with Pre-Trial Order No. 4, and that the foregoing was electronically filed with the Clerk of Court of the United States District Court for the Eastern District of Louisiana by using the CM/ECF system which will send a Notice of Electronic Filing in accord with the procedures established in MDL 1355 on this 1<sup>st</sup> day of August, 2012.

/s/ Leonard A. Davis

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