

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re Navistar MaxxForce Engines)	Case No. 1:14-cv-10318
Marketing, Sales Practices and Products)	
Liability Litigation)	This filing applies to:
)	All Class Cases
)	
)	Judge Joan B. Gottschall
)	
)	

**PLAINTIFFS’ MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES
AND FOR CLASS REPRESENTATIVE SERVICE AWARDS**

Plaintiffs respectfully move this Court to

(1) award attorneys’ fees and costs of \$40 million (broken down as \$36,488,073.26 in attorneys’ fees and \$3,511,926.74 in reimbursement for out-of-pocket costs), to be paid from the Cash Fund as provided in the Settlement;¹

(2) award service awards of \$25,000 to each of the 29 Named Plaintiffs identified in Exhibit D to the Selbin Declaration, to compensate them for their significant time and effort spent on behalf of the Class, to be paid from the Cash Fund as provided in the Settlement; and

(3) authorize Co-Lead Class Counsel to allocate the fees and costs among all Class counsel, subject to any disputes being resolved by the Court.

For the reasons explained in the attached Memorandum of Points and Authorities and attached declarations, Plaintiffs request the Court grant this Motion.

¹ The Settlement Agreement appears at Dkt. 632-1. Capitalized terms not otherwise defined have the meanings defined in the Settlement Agreement.

Dated: September 10, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on September 10, 2019, I served the foregoing on all counsel of record via ECF.

/s/ Andrew R. Kaufman