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10 [Additional counsel appear on signature page]

11 UNITED STATES DISTRICT COURT  
 12 SOUTHERN DISTRICT OF CALIFORNIA  
 13

14 IN RE: PACKAGED SEAFOOD ) Case No.: 15-MD-2670 DMS (MDD)  
 15 PRODUCTS ANTITRUST )  
 16 LITIGATION ) **END PAYER PLAINTIFFS’**  
 17 \_\_\_\_\_ ) **NOTICE OF MOTION AND**  
 ) **MOTION FOR COSTS IN**  
 ) **CONJUNCTION WITH COSI**  
 ) **SETTLEMENT**

18 This Document Relates To: )

19 End Payer Plaintiff Class Track )

20 DATE: July 15, 2022  
 21 TIME: 1:30 p.m.  
 22 JUDGE: Hon. Dana M. Sabraw  
 23 COURT: 13A (13<sup>th</sup> Floor)  
 24 )  
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**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, on July 15, 2022 at 1:30 p.m. in Courtroom 13A of the United States District Court, Southern District of California, located at 333 West Broadway, San Diego 92101, the End Payer Plaintiffs (“EPPs”) in the above captioned action, will and hereby do move the Court for an award of costs in conjunction with final approval of the COSI Settlement between the EPPs and Defendants Tri-Union Seafoods LLC d/b/a Chicken of the Sea (“COSI”) and Thai Union Group PCL (“TUG”) (“COSI Settlement”).

The EPPs seek approval of the following costs and expenses: (i) class notice (\$914,090) and claims administration (\$233,000) costs incurred through April 2022 in the amount of \$1,147,000; (ii) a further distribution of \$597,870 as permitted under the terms of the Settlement Agreement to cover estimated administration costs (\$500,000) and media costs (\$97,870); and (iii) an expense award of \$4,155,027.67 to reimburse Class Counsel for specific out of pocket litigation costs incurred as of May 2021.

The Motion is based on the accompanying Memorandum of Points and Authorities and supporting Supplemental Declaration of Betsy C. Manifold as well as the record and further briefing in this matter and the arguments at the hearing of this Motion, if any. A proposed order is being submitted contemporaneously with this Motion and the Motion and supporting papers will be posted to the dedicated settlement website.

Dated: May 25, 2022

By: s/ Betsy C. Manifold  
BETSY C. MANIFOLD

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