

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

-----x	
IN RE: PROPULSID PRODUCTS	: MDL NO. 1355
LIABILITY LITIGATION	: SECTION: L
	: JUDGE FALLON

-----x	
This Document Relates to:	:
All cases	:
	:
	:

**THE PLAINTIFFS’ STEERING COMMITTEE’S
MOTION FOR DISTRIBUTION OF SPECIFIC
ATTORNEY’S FEES AWARDS ANDFOR,
EXPENSES AND REIMBURSEMENTS
(RE: MDL SETTLEMENT PROGRAM I)**

NOW COMES, Russ M. Herman, Plaintiffs’ Liaison Counsel, on behalf of the Plaintiffs’ Steering Committee in this MDL who moves the Court as follows:

I.

The Plaintiffs’ Steering Committee hereby submits a motion for certain specific awards of attorney’s fees derived from the Propulsid MDL Settlement Program I.

II.

The members of the Plaintiffs’ Steering Committee and others substantially contributed to the successful settlement reached in this matter and will continue to contribute towards efforts in this matter.

III.

The specific distributions of attorney’s fees in connection with this motion follow resolution

of certain disputes with specific counsel regarding their contribution to the common benefit effort of all plaintiffs.

IV.

Movant seeks an Order authorizing Russ M. Herman on behalf of the Plaintiffs' Steering Committee, to make specific distributions for legal fees from the Fee Fund of MDL 1355 as follows:

Daniel Becnel	\$650,000.00
Walter Dumas	\$300,000.00
A.J. Rebeneck	\$ 33,476.53
Richard Lockridge	\$ 50,000.00

V.

In addition to the foregoing, considerable expenses have been incurred on an ongoing basis and the PSC continues to operate the Propulsid depository and incur other expenses on an ongoing basis, all of which require funding. Expense submissions and figures have been routinely submitted and which have been certified by the independent CPA of the Plaintiffs' Steering Committee, Philip Garrett. Movant seeks an Order authorizing Russ M. Herman on behalf of the Plaintiffs' Steering Committee to make an additional interim distribution of \$60,000.00 from the funds presently on deposit with Deutsch Bank for payment of expenses and costs in this matter which shall constitute

a partial distribution to be used solely for the payment of expenses and costs incurred thus far and to be incurred in this matter.

Respectfully submitted,

/s/ Leonard A. Davis
RUSS M. HERMAN, T.A. (La. Bar #6819)
LEONARD A. DAVIS, #14190
JAMES C. KLICK, #7451
HERMAN GEREL, LLP
820 O'Keefe Avenue
New Orleans, Louisiana 70113
Phone: (504) 581-4892; Fax: (504) 561-6024

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 3rd day of April, 2009.

/s/ Leonard A. Davis
Leonard A. Davis (Bar No. 14190)
Herman Gerel LLP
820 O'Keefe Ave.
New Orleans, LA 70113
PH: (504) 581-4892
FAX: (504) 561-6024
ldavis@hhkc.com