

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL	§	
LEAGUE PLAYERS’ CONCUSSION	§	
LITIGATION	§	
_____	§	No. 12-md-2323 (AB)
	§	
	§	MDL No. 2323
THIS DOCUMENT RELATES TO:	§	
ALL ACTIONS	§	

**Motion to Stay Enforcement of Attorneys’ Fee Allocation Order (ECF
10019) Pending Appeal
And
Request for Expedited Consideration**

The Alexander Objectors and Lubel Voyles, LLP (hereinafter “Movants”) and file this motion pursuant to Fed. R. Civ. P. 62, and, for the reasons set forth in the accompanying memorandum, respectfully request the Court stay enforcement of the Court’s attorneys’ fee allocation order (ECF 10019) pending appeal of that order and the underlying, related orders awarding common benefit fee (ECF 9860/9861); maintaining a 5% holdback from Class Members’ recoveries for future fees (ECF 7151); and presumptively limiting the effective IRPA fee recovery to 17% (ECF 9862/9863).

Date: May 25, 2018

Respectfully Submitted,

Mickey Washington
Texas State Bar No.: 24039233

/s/ Lance H. Lubel _____
Lance H. Lubel
Texas State Bar No.: 12651125

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CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2018, I filed the foregoing through the Court's CM/ECF system, which will provide electronic notice to all counsel of record and constitutes service on all counsel of record.

/s/ Lance H. Lubel _____
Lance H. Lubel