

THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
LOUISVILLE DIVISION

IN RE: SKECHERS TONING SHOES  
PRODUCTS LIABILITY LITIGATIONS

This document relates to ALL CASES

Master File No. No. 3:11-MD-2308-TBR  
MDL No. 2308

Honorable Thomas B. Russell  
U.S. District Judge

**MOTION TO RELEASE COMMON  
BENEFIT FUNDS**

Come the Plaintiffs, by Co-Lead Counsel for the MDL No. 2308, in the Skechers Toning Shoes Product Liability Litigation, and respectfully request that the Courte enter the attached order releasing a portion of the common benefit funds for the specific and limited purpose of paying fees owed to Special Master Francis McGovern for his work to date in establishing settlement and mediation protocol for the benefit of all Plaintiffs.

A copy of the invoices for the work performed by the Special Master are attached hereto as Exhibit 1. These amounts are significantly less than the total amount of common benefit funds collected to date from individual case assessments. Additionally, the Plaintiffs move the Court to order that, going forward, common benefit funds may be used to pay future invoices received for services performed by the Special Master to the extent that they benefit all Plaintiffs in the MDL. Services rendered by the Special Master for specific cases and parties will be paid for by those parties.

Respectfully submitted,

/s/ Ronald E. Johnson, Jr.

Ronald E. Johnson, Jr. (88302)

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**Certificate of Service**

I hereby certify that on this 19<sup>th</sup> day of May, 2014 a copy of the foregoing was filed electronically and served via ECF or e-mail to all counsel listed on the Attorney Service List.

/s/Ronald E. Johnson, Jr.

Ronald E. Johnson, Jr. (88302)