

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

In re: NAVISTAR DIESEL ENGINE)	Case No. 11 C 2496
PRODUCTS LIABILITY)	MDL NO. 2223
LITIGATION)	

This Document Relates to: All Cases

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND SERVICE AWARDS**

Plaintiffs¹ have reached a settlement agreement with Defendant Ford Motor Company (“Ford”) to resolve this case, which the Court preliminarily approved on November 14, 2012, and which is set for a final approval hearing on May 22, 2013. (Dkt. 242.) In connection with this settlement, Ford has agreed not to oppose Plaintiffs’ application for attorneys fees’ up to \$12,800,000, costs and expenses up to \$1,250,000, and service awards to be allocated among the named plaintiffs up to a total of \$150,000. (Dkt. 236-1 at II.I-J.) For the reasons set forth in Plaintiffs’ Memorandum in Support of this Motion, Plaintiffs respectfully request that the Court approve their application for these attorneys’ fees, expenses, and service awards.

¹ Plaintiffs are Custom Underground, Inc., John Barrett, Scott and Heather Gray, Frank Brown Towing, Inc., Cecil and Tressie Fulton, Karl Strong, Dinonno Enterprises, Inc., d/b/a Cutting Edge Concrete Cutting, Charles Clark, Georgean Vogt, John Prebish, Steve Santilli, Anthony Mawyer, Gena Boggero, Carl Atwell, Phillip Marcum, and James Hutton.

Dated: April 10, 2013

Respectfully submitted,

By: /s/ Michael A. Caddell

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MDL LEAD COUNSEL FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I hereby certify that on April 10, 2013, I conferred with Brian Anderson, counsel for Defendant Ford Motor Co., regarding this motion. Mr. Anderson advised that Ford does not oppose the motion.

/s/ Cynthia B. Chapman

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2013, this document was filed electronically via the Court's ECF system and thereby served on all counsel of record.

/s/ Cynthia B. Chapman