

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

IN RE: ) MDL Docket No. 1953  
)  
) JUDGE JAMES G. CARR  
HEPARIN PRODUCTS ) CASE NO. 1:08-60000  
LIABILITY LITIGATION )  
) ALL CASES  
)  
) MOTION OF PLAINTIFFS' LIAISON  
) COUNSEL TO APPROVE REMAINING  
) SHARED COSTS, HELD COSTS AND  
) ALLOCATION OF COMMON  
) BENEFIT ATTORNEYS' FEES  
)  
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The Heparin Plaintiffs' Executive Committee ("PEC"), Plaintiffs' Steering Committee ("PSC") and other common benefit plaintiffs' counsel have authorized Plaintiff MDL and State Liaison Counsel to submit the following Motion to Approve Remaining Shared Costs, Held

Costs and Allocation of Common Benefit Attorneys' Fees. This motion seeks approval of costs and further requests that this Honorable Court approve the award and allocation of common benefit attorneys' fees approved and recommended by the PEC, PSC and other common benefit Plaintiffs' counsel.

An Ex Parte Memorandum in Support of this Motion and accompanying Exhibits have been filed separately under Seal.

Respectfully Submitted,

/s/ David W. Zoll  
David W. Zoll  
Pamela A. Borgess  
ZOLL, KRANZ, & BORGESS, LLC  
*MDL Co-Liaison Counsel for Plaintiffs*

/s/ Donald Nolan  
Donald Nolan  
NOLAN LAW GROUP  
*State Court Liaison Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing was served electronically on this 2nd day of November, 2012, to all counsel of record through the Court's electronic filing system and via e-mail delivery.

/s/ Pamela A. Borgess  
Pamela A. Borgess, Esq. (0072789)