

Jonathan D. Clemente  
CLEMENTE MUELLER, P.A.  
222 Ridgedale Avenue  
Cedar Knolls, NJ 07927  
(973) 455-8008  
*Liaison Counsel for Direct Purchaser Class Plaintiffs*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

*In re Neurontin Antitrust Litigation*

**Master File No. 02-1390**

**THIS DOCUMENT RELATES TO:**

**Civil Action No. 02-1830  
Civil Action No. 02-2731**

**LOUISIANA WHOLESALE DRUG  
COMPANY, INC., MEIJER, INC. and  
MEIJER DISTRIBUTION, INC., on  
behalf of themselves and all others  
similarly  
situated,**

**Plaintiffs,**

**v.**

**PFIZER, INC. and WARNER-  
LAMBERT  
CO.,**

**Defendants.**

**NOTICE OF MOTION IN SUPPORT OF  
CLASS COUNSEL'S MOTION  
FOR AN AWARD OF  
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,  
AND INCENTIVE AWARDS  
FOR CLASS REPRESENTATIVES**

TO: ALL COUNSEL ON ATTACHED DISTRIBUTION LIST

PLEASE TAKE NOTICE that on July 31, 2014, at 10:00 a.m. or as soon thereafter as counsel may be heard, Direct Purchaser Class Counsel (“Class Counsel”) shall move before United States District Court, District of New Jersey, Newark Office, M.L. King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, for the entry of an order awarding (i) Class Counsel fees in the amount of 33⅓% of the Settlement Fund and a proportionate share of the interest thereon through the date of the award; (ii) reimbursement of expenses in the amount of \$2,213,537.35 plus interest; and (iii) incentive awards of \$100,000 to each of the Class Representatives, LWD and Meijer.

In support of this motion, Plaintiffs rely upon the Memorandum of Law in Support of Class Counsel’s Motion For An Award of Attorneys’ Fees, Reimbursement of Expenses, and Incentive Awards for Class Representatives, as well as the Joint Declaration of Bruce E. Gerstein and Richard J. Kilsheimer in Support of Direct Purchaser Class Plaintiffs’ Motions for Final Approval of Settlement And For An Award of Attorneys’ Fees, Reimbursement of Expenses and Incentive Awards to Class Representatives, submitted concurrently herewith.

A proposed form of Order is submitted concurrently herewith.

Date: July 1, 2014

CLEMENTE MUELLER, PA

By: /s Jonathan D. Clemente

Jonathan D. Clemente

222 Ridgedale Avenue

Cedar Knolls, NJ 07927

(973) 455-800

*Liaison Counsel for Direct Purchaser  
Class Plaintiffs*

GARWIN GERSTEIN & FISHER,  
L.L.P.

Bruce E. Gerstein

88 Pine Street, 10<sup>th</sup> Floor

New York, NY 10005

Tel.: (212) 398-0055

Fax: (212) 764-6620

KAPLAN FOX & KILSHEIMER, LLP

Robert N. Kaplan

Richard J. Kilsheimer

850 Third Avenue, 14th Floor

New York, NY 10022

Tel.: (212) 687-1980

Fax: (212) 687-7714

*Co-lead Counsel for the Direct Purchaser Class Plaintiffs*

ODOM & DES ROCHEs, L.L.P.

John Gregory Odom

Stuart E. Des Roches

Suite 2020, Poydras Center

650 Poydras Street

New Orleans, LA 70130

Tel.: (504) 522-0077

Fax: (504) 522-0078

SMITH SEGURA & RAPHAEL LLP

David P. Smith

720 Murray Street

P.O. Box 1632

Alexandria, LA 71309

Tel.: (318) 445-4480

Fax: (318) 487-1741

SPERLING & SLATER, P.C.

Paul E. Slater

55 West Monroe Street

Suite 3200

Chicago, IL 60603

Tel.: (312) 641-3200

BERGER & MONTAGUE, P.C.

Daniel Berger

Eric L. Cramer

Ellen T. Noteware

1622 Locust Street

Philadelphia, PA 19103

Fax: (312) 641-6490

Tel.: (215) 875-3000

Fax: (215) 875-4604

VANEK, VICKERS & MASINI,  
P.C.

Joseph M. Vanek  
David P. Germaine  
111 S. Wacker, Suite 4050  
Chicago, IL 60606  
Tel.: (312) 224-1500  
Fax: (312) 224-1510

HEIM PAYNE & CHORUSH  
LLP

Russell A. Chorush  
600 Travis, suite 6710  
Houston, Texas 77002  
Tel.: (713) 221-2000  
Fax: (713) 221-2021

GRANT & EISENHOFER, P.A.

Linda P. Nussbaum  
485 Lexington Ave., 29<sup>th</sup> Fl.  
New York, NY 10017  
Tel.: (646) 722-8504  
Fax: (646) 722-8501

KOHN, SWIFT & GRAF, P.C.

Joseph C. Kohn  
One South Broad Street  
Suite 2100  
Philadelphia, PA 19107  
Tel.: (215) 238-1700  
Fax: (215) 238-1968

KOZYAK TROPIN &  
THROCKMORTON, P.A.

Adam Moskowitz  
2800 First Union Financial Center  
200 South Biscayne Boulevard  
Miami, FL 33131-2335  
Tel.: (305) 377-0652  
Fax: (305) 372-3508