

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>IN RE NAMENDA DIRECT PURCHASER ANTITRUST LITIGATION</b>	<b>Case No. 1:15-CV-07488-CM-JCF</b>
<b>THIS DOCUMENT RELATES TO: All Direct Purchaser Actions</b>	

**DIRECT PURCHASER CLASS PLAINTIFFS’  
MOTION FOR AN ORDER OF DISTRIBUTION**

Direct Purchaser Class Plaintiffs (“Plaintiffs”), by undersigned counsel (“Class Counsel”), respectfully move this Court, pursuant to the Court’s Opinion and Order Approving the Settlement (ECF No. 947) and the Court’s Order Granting Final Judgment and Order of Dismissal Approving Direct Purchaser Class Settlement and Dismissing Direct Purchaser Class Claims (ECF No. 948), for an Order (i) approving the administrative determinations of the Court-approved claims administrator, Rust Consulting, Inc. (“Rust”), concerning the claims filed in this case; (ii) approving and authorizing the distribution of the “Net Settlement Fund,” as defined in the Plan of Allocation (ECF No. 919-2), to Claimants whose Claim Forms have been approved by Rust or to the Claimants’ assignees, in accordance with the Claimants’ instructions; (iii) approving payments to Rust and to Monument Economics Group, the economic consultant retained by Class Counsel to assist Rust with the claims administration process,<sup>1</sup> for fees and expenses incurred or to be incurred in connection with the claims administration process; and (iv) finally barring any further or additional claims against the Net Settlement Fund.

In support of this motion, Plaintiffs rely upon the accompanying Memorandum and

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<sup>1</sup> Monument’s president, Dr. Russell Lamb, was the expert economist for the Plaintiffs during the litigation.

the Declaration of Phil Mattoon of Rust Consulting, Inc. in Support of Direct Purchaser Class Plaintiffs' Motion for an Order of Distribution and exhibits thereto (attached hereto as Exhibit 1).

A proposed order is attached hereto as Exhibit 2.

Dated: February 5, 2021

Respectfully Submitted:

/s/ Bruce E. Gerstein

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***Counsel for the Direct Purchaser Class Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2021, I electronically filed the above by CM/ECF system.

Respectfully submitted,

/s/ Bruce E. Gerstein  
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