

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

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: 06-MD-1775 (JG) (VVP)
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**PLAINTIFFS' NOTICE OF MOTION
FOR AN AWARD OF INTERIM ATTORNEYS' FEES
AND INTERIM REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE THAT, upon the Joint Declaration of Co-Lead Counsel in Support of (1) Final Approval of The Settlement Agreements with All Nippon Airways Co., Ltd., Cargolux Airlines International S.A., Qantas Airways Limited and Thai Airways International Public Company Limited; (2) Plaintiffs' Counsel's Joint Application for Interim Attorneys' Fees and Interim Reimbursement of Expenses; and (3) The Plan of Allocation, dated May 10, 2011, and the Compendium of Declarations of Plaintiffs' Counsel, the annexed exhibits, the Memorandum in Support of Plaintiffs' Joint Application for Interim Attorneys' Fees and Interim Reimbursement of Expenses and all prior papers and proceedings, Plaintiffs will move this Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, in Courtroom 6C-S, on June 24, 2011, at noon, for an order awarding interim attorneys' fees and reimbursement of expenses, and granting such other and further relief as may be appropriate.

Dated: New York, New York
May 10, 2011

Respectfully submitted,

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