

James E. Cecchi  
CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.  
5 Becker Farm Road  
Roseland, New Jersey 07068  
(973) 994-1700

*Interim DPP Lead Counsel and  
Chair of the Direct Purchaser Plaintiffs' Steering Committee*

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

In Re: LIQUID ALUMINUM SULFATE  
ANTITRUST LITIGATION

Civil Action No. 16-md-2687 (JLL) (JAD)

**NOTICE OF MOTION**

To: All Persons on ECF Service List

COUNSEL:

PLEASE TAKE NOTICE that on April 17, 2019 at 1:30 p.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Direct Purchaser Class Plaintiffs<sup>1</sup> shall move before Hon. Jose L. Linares, U.S.D.J. at the Martin Luther King Federal Building, 50 Walnut Street, Newark, New Jersey 07102 for an Order granting final approval of the settlements with Kemira Chemicals, Inc. and with the Chemtrade Defendants<sup>2</sup>, and for an award of attorney's fees, reimbursement of litigation expenses and payment of class contribution awards.

---

<sup>1</sup> Direct Purchaser Class Plaintiffs are Central Arkansas Water; City of Charlotte, North Carolina; City and County of Denver, Colorado, acting by and through its board of Water Commissioners; Flambeau River Papers, LLC; City of Greensboro, North Carolina; Mobile Area Water and Sewer System; City of Rochester, Minnesota; City of Sacramento, California; SUEZ Water Environmental Services Inc.; SUEZ Water New Jersey Inc.; SUEZ Water Princeton Meadows Inc.; SUEZ Water New York Inc.; SUEZ Water Pennsylvania Inc.; City of Texarkana, Arkansas and City of Texarkana, Texas, d/b/a Texarkana Water Utilities, and City of Shreveport, Louisiana.

<sup>2</sup> The Chemtrade Defendants include Chemtrade Logistics Income Fund; General Chemical Corporation; General Chemical LLC; General Chemical Performance Products, LLC;

The undersigned intend to rely upon the annexed Brief and the Declarations of James E. Cecchi, Andy Morrison, Arthur Bailey, Barbara Hart, Bruce Greenberg, Eric Fastiff, Erin Burns, Garrett Blanchfield, Howard Sedran, Janet Evans, Jason Zweig, Jeffrey Corrigan, Jennifer Scullion, John Emerson, Jon Exelrod, Joseph Meltzer, Linda Nussbaum, Lisa Rodriguez, Lynn Lincoln Sarko, M. Stephen Dampier, Matt Keil, Manuel John Dominguez, Mark Dearman, Michael Critchley, Michael Plachy, Mike Roberts, Robert Kitchenoff, Ruthanne Gordon, Sami Rashid, Sanford Dumain, Scott Gale, Thomas Theado, Vincent Esades, W. Joseph Bruckner, and Whitney Street. Proposed forms of Order will be submitted with Direct Purchaser Class Plaintiffs' reply papers.

The undersigned hereby request oral argument.

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.  
*Interim DPP Lead Counsel and  
Chair of the Direct Purchaser Plaintiffs'  
Steering Committee*

By: /s/ James E. Cecchi  
JAMES E. CECCHI

Dated: March 22, 2019

---

Chemtrade Chemicals Corporation; Chemtrade Chemicals US LLC; and Chemtrade Solutions, LLC, as well as former Chemtrade employees named as defendants, Alex Avraamides, Frank Reichl, Amita Gupta, and Vincent Opalewski.