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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 Counsel on ECF Service List

COUNSEL:

PLEASE TAKE NOTICE that on November 14, 2018 at 9:00 a.m., the undersigned counsel for Direct Purchaser Class Plaintiffs will and hereby do move before the Honorable Jose L. Linares, U.S.D.J. at the Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey for orders, pursuant to Fed. R. Civ. P. 23(e): (i) granting final approval of the proposed partial settlement of the above-captioned action on the terms set forth in the Settlement Agreement Between Direct Purchaser Class Plaintiffs and Defendants GEO Specialty Chemicals, Inc., Kenneth A. Ghazey and Brian C. Steppig dated June 1, 2018; (ii) affirming certification of the Direct Purchaser Settlement Class for purposes of effectuating the settlement; (iii) approving the proposed plan for distributing the settlement proceeds to the Direct Purchaser Settlement Class; and (iv) awarding attorneys' fees and reimbursement of expenses.

The undersigned intends to rely on the annexed Brief and the Declarations of James E. Cecchi, Charles E. Ferrara, Derek Loesser, Crid B. Fastiff, Jennifer Scullion, Kimberly Justice, Linda P. Nussbaum, Mark J. Dearman, Sami H. Rashid and Michael Critchley. Proposed orders will be submitted with Interim DPP Lead Counsel's reply submission on or before November 7, 2018, after the deadline for objecting and requesting exclusion from the Direct Purchaser Settlement Class has passed.

The undersigned hereby requests oral argument.

**CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO P.C.**
Interim DPP Lead Counsel

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

Dated: September 17, 2018