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 (MCA) (JAD)

NOTICE OF MOTION

To: All Persons On ECF Service List

COUNSEL:

PLEASE TAKE NOTICE that on Thursday, September 26, 2019 at 2 p.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Direct Purchaser Class Plaintiffs shall move before Hon. Madeline Cox Arleo at the Martin Luther King Federal Building, 50 Walnut Street, Newark, New Jersey for an Order pursuant to Fed.R.Civ.P. 23(e) granting final approval of the settlements between Direct Purchaser Class Plaintiffs and Southern Ionics Incorporated, USALCO LLC, and American Securities, LLC, and for an award of attorney's fees and reimbursement of expenses.

The undersigned intends to rely upon the annexed Declarations of James E. Cecchi and Andy Morrison, and Brief.

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: August , 2019