UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

IN RE: DEERE & COMPANY REPAIR SERVICES ANTITRUST LITIGATION	MDL No. 3030 Case No.: 3:22-cv-50188 Hon. Iain D. Johnston

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARDS

PLEASE TAKE NOTICE that, pursuant to paragraph 19 of the Court's Amended Preliminary Approval Order (Dkt. No. 367), Co-Lead Counsel for Plaintiffs will present their Motion for Attorneys' Fees, Reimbursement of Expenses, and Class Representative Service Awards at the Fairness Hearing scheduled for January 19, 2027, at 10:00 a.m., before the Honorable Iain D. Johnston in Courtroom 5200 of the Stanley J. Roszkowski U.S. Courthouse, 327 South Church Street, Rockford, Illinois 61101.

Pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2), Co-Lead Counsel seek an order (1) awarding $37,000,000 in attorneys' fees; (2) reimbursing $4,743,801.26 in litigation expenses, comprising $4,447,207.16 incurred by the Litigation Fund and $296,594.10 incurred by individual firms; and (3) awarding service awards of $25,000 each to Class Representatives Plum Ridge Farms, Ltd., Colvin Farms, LLC, England Farms & Harvesting, LLC, Hapka Farms, Inc., Eagle Lake Farms Partnership, and Blake Johnson, and to Wilson Farms Land & Cattle Co., LLC for a total of $175,000.

The Settlement provides a $99 million monetary fund plus accrued interest and substantial injunctive relief. Including $2,666,917.02 in accrued interest, the gross monetary Settlement Fund reached $101,666,917.02 before payment of notice and administration costs and bank fees.

Following disbursements for notice and administration costs and the assessment of bank fees, the escrow account balance stands at $101,241,761.55 as of October 27, 2026. *See* Dkt. No. 369; Joint Declaration of Co-Lead Counsel ("Joint Decl.") ¶ 14.

This Motion is supported by the concurrently filed Memorandum of Law, the supporting declarations and exhibits submitted therewith, and any additional evidence or arguments presented at the Fairness Hearing.

Dated: October 30, 2026

Respectfully submitted,

By: */s/ Adam J. Zapala*
Adam J. Zapala
Elizabeth T. Castillo
Christopher F. Jeu
Christian S. Ruano
COTCHETT, PITRE & McCARTHY LLP
840 Malcolm Road
Burlingame, CA 94010
Telephone: (650) 697-6000
azapala@cpmlegal.com
ecastillo@cpmlegal.com
cjeu@cpmlegal.com
cruano@cpmlegal.com

By: */s/ Kenneth A. Wexler*
Kenneth A. Wexler
Justin N. Boley
Tyler J. Story
Margaret L. Shadid
WEXLER BOLEY & ELGERSMA LLP
311 South Wacker Drive
Suite 5450
Chicago, IL 60606
Telephone: (312) 346-2222
kaw@wbe-llp.com
jnb@wbe-llp.com
tjs@wbe-llp.com
ms@wbe-llp.com

By: */s/ Daniel C. Hedlund*
Daniel E. Gustafson
Daniel C. Hedlund

Michelle J. Looby
Frances Mahoney-Mosedale
GUSTAFSON GLUEK PLLC
120 South Sixth Street #2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
mlooby@gustafsongluek.com
fmahoneymosedale@gustafsongluek.com

Dennis Stewart
GUSTAFSON GLUEK PLLC
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 595-3299
dstewart@gustafsongluek.com

Co-Lead Counsel for Plaintiffs

Robert Foote, Esq. (3124325)
Kathleen C. Chavez, Esq. (6255735)
Elizabeth C. Chavez (6323726)
Bret K. Pufahl (6325814)
FOOTE, MIELKE, CHAVEZ & O'NEIL, LLC
10 W. State Street, Suite 200
Geneva, IL 60134
Telephone: (630) 912-5702
rmf@fmcolaw.com
kcc@fmcolaw.com
ecc@fmcolaw.com
bkp@fmcolaw.com

Liaison Counsel for Plaintiffs

Marc C. Gravino (6188531)
WILLIAMSMCCARTHY LLP
P.O. Box 219
Rockford, IL 61105
Telephone: (815) 987-8936
mgravino@wilmac.com

Local Facilitating Counsel for Plaintiffs