

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

DAVID STARR, BERNADETTE
MAVRIKOS, EDMUND QUIAMBAO,
JAMES TETTENHORST, JEREMY
HANSEN, KRISTA KARO,
ARLENE REED-COSSAIRT, PETER STAVROS,
HEATHER FARKAS,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

VSL PHARMACEUTICALS, INC.; LEADIANT
BIOSCIENCES, INC., F/K/A SIGMA-TAU
PHARMACEUTICALS, INC.; and ALFASIGMA
USA, INC.,

Defendants.

No. 8:19-cv-02173-LKG

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS**

Plaintiffs and Class Representatives David Starr, Bernadette Mavrikos, Edmund Quiambao, James Tettenhorst, Jeremy Hansen, Krista Karo, Arlene Reed-Cossairt, Peter Stavros and Heather Farkas (collectively, "Plaintiffs"), by and through undersigned counsel, respectfully file this Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Awards (the "Motion"). By this Motion, Plaintiffs seek court approval for: (i) an award of attorneys' fees for Class Counsel in the amount of \$6,666,666.67 out of the Settlement Fund, which is one-third of the \$20 million Settlement Fund created as a result of their highly successful efforts in this litigation; (ii) an award of \$1,241,580 out of the Settlement Fund for Litigation Expenses

that were reasonably and necessarily incurred by Class Counsel in prosecuting and settling the action; (iii) service awards, out of the Settlement Fund, of \$10,000 to each of the Class Representatives; and (iv) authorization for Class Counsel to pay the Settlement Administrator its actual fees and expenses—in an amount not to exceed \$195,000—out of the Settlement Fund for notice and claims administration.

In support of this Motion, Plaintiffs submit an accompanying Memorandum in Support and the Joint Declarations of Class Counsel (the “Declaration”). For the reasons set forth in the Memorandum and the Declaration, Plaintiffs’ Motion should be granted.

Dated: September 21, 2026

Respectfully submitted,

By: /s/ Jeremy W. Schulman
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