

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST LITIGATION)	
)	
)	MDL Docket No. 2196
This document relates to:)	Index No. 10-MD-2196 (JZ)
)	
ALL DIRECT PURCHASER ACTIONS)	
)	

**DIRECT PURCHASER (CLASS) PLAINTIFFS’ NOTICE OF MOTION AND MOTION
FOR AN AWARD OF ATTORNEYS’ FEES AND FOR REIMBURSEMENT OF
EXPENSES**

Pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, on May 7, 2013 at 10:00 a.m. at the James Ashley and Thomas W.L. Ashley U.S. Courthouse, 1716 Spielbusch Avenue, Toledo, Ohio, or as soon thereafter as the Court may hear this matter, the interim class representatives of the Direct Purchaser (Class) Plaintiffs (“Class Plaintiffs”), through interim co-lead counsel Boies Schiller & Flexner, LLP and Quinn Emanuel Urquhart & Sullivan, LLP, as well as the putative Direct Purchaser Class Executive Committee,¹ will and do respectfully move this Court for an award of attorneys’ fees and reimbursement of litigation expenses from the settlement with Vitafoam Inc. and Vitafoam Products Canada Limited, and the settlement with defendants Domfoam International Inc. (“Domfoam”), Valle Foam Industries (1995) Inc. (“Valle Foam”), and A-Z Sponge & Foam Products Ltd., and non-defendants Bruce Bradley, Dean Brayianis, Michael Cappuccino, Peter Foti, Duke Greenstein, John Howard, Dale McNeill, James William Sproule, Robert Rochietti-Valle, Tony Vallecoccia, and Fred Zickmantel.

¹ The Executive Committee comprises the following law firms: The Executive Committee consists of the following law firms: Bernstein Liebhard LLP; Grant & Eisenhofer P.A.; Hausfeld LLP; Pearson, Simon, Warshaw & Penny LLP; Robins, Kaplan, Miller, Ciresi LLP; Seeger Weiss LLP; Strange & Carpenter; and Weinstein Kitchenoff & Asher LLC.

Plaintiffs' motion is based upon Plaintiffs' Memorandum of Law in support of their motion and the Declaration of Stephen R. Neuwirth and the exhibits attached thereto, filed concurrently with this Notice of Motion and Motion. A proposed order is attached.

DATED: April 22, 2013

Respectfully Submitted,

/s/ William A. Isaacson
William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, NW
Washington, DC 20015
Phone: 202-237-5607
Fax: 202-237-6131

/s/ Stephen R. Neuwirth
Stephen R. Neuwirth
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Phone: 212-849-7165
Fax: 212-849-7100

Direct Purchaser (Class) Plaintiffs' Interim Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2013, in accordance with Paragraphs 5 and 9 of the Initial Case Management Order entered January 20, 2011, the foregoing DIRECT PURCHASER (CLASS) PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR AN AWARD OF ATTORNEYS' FEES AND FOR REIMBURSEMENT OF EXPENSES; the concurrently-filed MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION FOR AN AWARD OF ATTORNEYS' FEES AND FOR REIMBURSEMENT OF EXPENSES; and the concurrently-filed DECLARATION OF STEPHEN R. NEUWIRTH, and exhibits thereto, were filed electronically using the Court's ECF system, which will send notification of such filing to counsel of record.

/s/ Adam B. Wolfson

Adam B. Wolfson

QUINN EMANUEL URQUHART
& SULLIVAN, LLP

51 Madison Avenue, 22nd Floor

New York, NY 10010

Phone: 212-849-7165

Fax: 212-849-7100