

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

IN RE: POOL PRODUCTS DISTRIBUTION
MARKET ANTITRUST LITIGATION

MDL DOCKET NO. 2328

SECTION: R(2)

This document relates to:

CHIEF JUDGE VANCE

MAG. JUDGE WILKINSON

ALL DIRECT PURCHASER CASES

**DIRECT PURCHASER PLAINTIFFS’
MOTION FOR REIMBURSEMENT OF EXPENSES**

NOW INTO COURT, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Direct Purchaser Plaintiffs (“Plaintiffs”) through their Court-appointed Settlement Class Counsel – Herman, Herman & Katz, LLC; Bernstein Liebhard LLP; Kaplan Fox & Kilsheimer LLP; and Labaton Sucharow LLP – respectfully move this Court for an Order granting reimbursement of expenses from the Settlement Funds. This motion is based on the accompanying Memorandum of Law in Support of the Direct Purchaser Plaintiffs’ Motion for Reimbursement of Expenses, Declaration of Leonard A. Davis and Affidavit of Philip A. Garrett, C.P.A., submitted herewith, and the Declarations of Ronald J. Aranoff and Jennifer M. Keough accompanying the Motion for Final Approval of Settlements Between Direct Purchaser Plaintiffs and Defendants Hayward Industries Inc. and Zodiac Pool Systems, Inc. (R. Doc. 624).

WHEREFORE, Plaintiffs pray that, after due consideration, the Court: grant this Motion for reimbursement of expenses; and enters the attached [Proposed] Order.

Dated: March 12, 2015

Respectfully submitted,

/s/ Leonard A. Davis

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing Direct Purchaser Plaintiffs' Motion for Reimbursement of Expenses has been served on Direct Purchaser Plaintiffs' Liaison Counsel, Russ Herman, Indirect Purchaser Plaintiffs' Liaison Counsel, Thomas H. Brill, Defendants' Liaison Counsel, William Gaudet, and Manufacturer Defendants' Liaison Counsel, Wayne Lee, by e-mail and upon all parties by electronically uploading the same to LexisNexis File & Serve in accordance with Pretrial Order No. 8, and that the foregoing was electronically filed with the Clerk of Court of the United States District Court for the Eastern District of Louisiana by using the CM/ECF System, which will send a notice of electronic filing in accordance with the procedures established in MDL 2328, on this 12th day of March, 2015.

/s/ Leonard A. Davis