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**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

IN RE DUCTILE IRON PIPE  
FITTINGS (“DIPF”) DIRECT  
PURCHASER ANTITRUST  
LITIGATION

Civ. No. 12-711 (AET)(LHG)

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

PLEASE TAKE NOTICE THAT, on January 28, 2016 at 10:30 a.m., the undersigned attorneys for Direct Purchaser Plaintiffs (“DPPs”) in the above-captioned action shall move before the Hon. Anne E. Thompson, U.S.D.J., Clarkson S. Fisher Building, & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order granting an award of one-third of the Settlement Amounts of the SIGMA and Star Settlements to be used for: (i) reimbursement of incurred expenses in the amount of \$1,736,685.75; and (ii) an award of \$1,106,230.92 for future litigation expenses.

In support of this motion, DPPs rely upon the Memorandum of Law in Support of DPPs' Motion for Reimbursement of Expenses; the Declaration of Richard J. Kilsheimer in Support of Direct Purchaser Plaintiffs' Motion for Reimbursement of Expenses; and the Declaration of Lori Castaneda Regarding Notice and Settlement Administration.

DATED: December 29, 2015

/s/ Joseph J. DePalma

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*Interim Co-Lead Counsel for  
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**CERTIFICATE OF SERVICE**

I, Joseph J. DePalma, hereby certify that on this day, a true and correct copy of Direct Purchaser Plaintiffs' Notice of Motion for Reimbursement of Expenses; Memorandum of Law in Support of DPPs' Motion for Reimbursement of Expenses; the Declaration of Richard J. Kilsheimer in Support of Direct Purchaser Plaintiffs' Motion for Reimbursement of Expenses; the Declaration of Lori Castaneda Regarding Notice and Settlement Administration; and Proposed Form of Order were electronically filed and served on all counsel of record via the Court's ECF system.

Dated: December 29, 2015

/s/Joseph J. DePalma  
Joseph J. DePalma