

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

TONY LUIB, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

HENKEL CONSUMER GOODS, INC.,

Defendant.

No. 1:17-cv-03021-BMC

**PLAINTIFF'S UNOPPOSED NOTICE OF MOTION AND MOTION FOR AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES TO
CLASS COUNSEL AND INCENTIVE AWARD TO THE CLASS REPRESENTATIVE**

Plaintiff Tony Luib (“Plaintiff”) hereby provides notice that on August 16, 2019 at 10:00 a.m. he will hereby move before this Court for an Order granting payment of \$495,000 (which is 33% of the settlement fund) for Class Counsel’s attorneys’ fees, \$10,861.21 for reimbursement of litigation expenses, and \$7,500 to Plaintiff as an Incentive Award for his efforts and contributions to this matter.

In support of this Unopposed Motion, Plaintiff relies upon the accompanying Memorandum of Law; the accompanying Declaration of Michael R. Reese in Support of Motion for Final Approval of Class Action Settlement and Motion for Payment of Class Counsel’s Fees; the Declaration of Michael R. Reese in Support of Motion for Preliminary Approval (ECF No. 54-2); the accompanying Declaration of Jason P. Sultzer; the accompanying Declaration of Amy E. Boyle; the support exhibits to the foregoing declarations; all the pleadings and documents on file in this action; and such other matters as may be presented at or before the hearing.

Date: July 8, 2019

Respectfully submitted,

By: /s/ Michael R. Reese

Michael R. Reese
George V. Granade
REESE LLP
100 West 93rd Street, 16th Floor
New York, New York 10025
Telephone: (212) 643-0500
Facsimile: (212) 253-4272
mreese@reesellp.com
ggranade@reesellp.com

THE SULTZER LAW GROUP, P.C.

Jason P. Sultzer
Adam R. Gonnelli
Michael Liskow
85 Civic Center Plaza, Suite 104
Poughkeepsie, New York 12601
Tel: (845) 483-7100
Fax: (888) 749-7747
sultzerj@thesultzerlawgroup.com

gonnellia@thesultzerlawgroup.com
liskowm@thesultzerlawgroup.com

HALUNEN LAW

Christopher Moreland
1650 IDS Center - 80 S 8th Street
Minneapolis, Minnesota 55402
Telephone: 612.605.4098
Facsimile: 612.605.4099
moreland@halunenlaw.com

Court Appointed Class Counsel