

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

**In re LITERARY WORKS IN
ELECTRONIC DATABASES
COPYRIGHT LITIGATION**

MDL 1379 (GBD)

**NOTICE OF MOTION OF
CATEGORY C CLAIMS COUNSEL
FOR AWARD OF ATTORNEYS'
FEES, COSTS AND INCENTIVE
AWARDS**

PLEASE TAKE NOTICE that on June 10, 2014, at 10:00 a.m. or as soon thereafter as counsel can be heard, the undersigned will move the Hon. George B. Daniels, United States District Judge, in Courtroom 11A of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for entry of an order (i) awarding attorneys' fees and reimbursement of expenses incurred by Category C Claims counsel; (ii) approving service awards to the ten class members who appealed the earlier settlement, two of whom are also serving as representatives of the Category C Claims subclass. The Motion is based on this Notice, the accompanying MEMORANDUM IN SUPPORT OF MOTION OF CATEGORY C CLAIMS COUNSEL FOR AWARD OF ATTORNEYS' FEES, COSTS AND INCENTIVE AWARDS, the DECLARATION OF CHARLES CHALMERS IN SUPPORT OF MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS AND INCENTIVE AWARDS and pleadings, orders and records in this action.

Dated: April 9, 2014

S/Charles Chalmers
Charles D. Chalmers

Charles D. Chalmers
Allegiance Litigation
769 Center Blvd., Ste. 134
Fairfax, CA 94930
415 869-8134
Fax 801 382-2469
cchalmers@allegiancelit.com