

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT

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THOMAS GEANACOPOULOS, On Behalf of)	
Himself and All Others Similarly Situated,)	
	Plaintiff,)	
)	
	v.)	Civ. Action No. 98-6002-BLS1
)	
PHILIP MORRIS USA, INC.,)	
	Defendant.)	
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PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES

Plaintiff Thomas Geanacopoulos respectfully moves this Court for an order awarding Plaintiff’s Counsel – the law firms of Shapiro Haber & Urmy, LLP (“Shapiro Haber & Urmy” or “Class Counsel”), Brody Hardoon Perkins & Kesten, LLP (“Brody Hardoon”) and Hagens Berman Sobol Shapiro LLP (“Hagens Berman”) – the sum of \$16,500,000 in attorneys’ fees and expenses to be paid by Philip Morris USA, Inc. (“Philip Morris” or “Defendant”) in addition to the settlement payment to the Class.

Plaintiff’s motion should be granted for the reasons set forth in the accompanying memorandum of law, and it is further supported by the Affidavit of Michelle H. Blauner, the Declaration of Thomas M. Sobol, the Affidavit of Andrew A. Rainer, and by the Expert Affidavit of Professor William Rubenstein filed herewith.

Defendant Philip Morris USA assents to the allowance of this motion in connection with the Settlement of this action.

Dated: July 29, 2016

Respectfully submitted,



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Attorneys for Plaintiff and the Certified Class

CERTIFICATE OF SERVICE

I, Michelle Blauner, hereby certify that the above was served upon Kenneth J. Parsigian, Esq., Andrew A. Rainer, Esq. and Thomas M. Sobol, Esq. by e-mail and regular mail on July 29, 2016.



Michelle Blauner