

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

)
BRYANT BUESCHER, CLARENCE)
IANNINE, CLARESSA WALLACE, and)
CRAIG COOK, individually and on behalf of)
all others similarly situated,)

CIVIL ACTION NO.:
5:20-cv-00147

)
)
Plaintiffs,)
)

v.)
)

BRENNTAG NORTH AMERICA, INC,)
BOARD OF DIRECTORS OF BRENNTAG)
NORTH AMERICA, INC., and)
BRENNTAG INVESTMENT AND)
OVERSIGHT COMMITTEE.)

)
Defendants.)
)

**PLAINTIFFS’ MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND
REIMBURSEMENT OF EXPENSES AND CASE CONTRIBUTION AWARDS
TO THE NAMED PLAINTIFFS**

Named Plaintiffs Bryant Buescher, Clarence Iannino,¹ Claressa Wallace, and Craig Cook, (collectively, “Plaintiffs”), participants in the Brenntag USA Profit Sharing Plan (the “Plan”) hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys’ fees in the amount of \$713,000.00 which represents 31% of the settlement amount;
2. Directing reimbursement to Class Counsel in the amount of \$ 13,151.29 of expenses incurred in the prosecution of the action;
3. Awarding case contribution award of \$10,000.00 to each of the four Named Plaintiffs (Bryant Buescher, Clarence Iannino, Claressa Wallace, and Craig Cook); and

¹ Plaintiff Iannino’s last name is inadvertently misspelled in the caption as “Iannine.”

4. For such other relief as the Court may deem just and proper. A proposed form of Order is submitted hereto.

The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

A. Memorandum of Law in Support of Plaintiffs' Motion For Award of Attorneys' Fees and Expenses, and Case Contribution Awards to the Named Plaintiffs;

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

C. Declaration of Named Plaintiff Bryant Buescher In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

D. Declaration of Named Plaintiff Clarence Iannino In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

E. Declaration of Named Plaintiff Claressa Wallace In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs; and

F. Declaration of Named Plaintiff Craig Cook In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs.

Dated: July 9, 2021

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

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Counsel for Plaintiffs and
the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2021 a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh