

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

ALICE H. ALLEN AND LAURENCE E. ALLEN, )  
et al )

*Plaintiffs* )

) CIVIL ACTION

) DOCKET NO. 5:09-CV-00230

VS. )

DAIRY FARMERS OF AMERICA, INC., and )  
DAIRY MARKETING SERVICES, LLC )

**ADDITIONAL NAMED REPRESENTATIVES STEPHEN H. TAYLOR AND DARREL  
J. AUBERTINE'S ALTERNATIVE MOTION FOR AWARD OF OVERALL  
ATTORNEYS' FEES, FOR INCENTIVE AWARD AND DIVISION OF SUCH FEES  
AMONG CLASS COUNSEL**

Pursuant to F.R.C.P. 23, Additional Named Representatives Stephen H. Taylor and Darrel J. Aubertine, through Additional Subclass Counsel Daniel Smith, Esq. and Richard T. Cassidy, Esq., respectfully move this Court for entry of an Order providing as set out below:

1. That Lead Counsel be awarded attorneys' fee Award in the amount of \$11.5 million dollars;
2. That the Additional Named Representatives be awarded incentive fees of \$20,000 each; and
3. That Additional Subclass Counsel be awarded attorneys' fees in the amount of \$500,000, together with their expenses.

Additional Named Representatives respectfully request the attorneys' fee awards, incentive awards, reimbursement of expenses and be disbursed from the DFA/DMS Settlement fund.

In support of this Motion, the Additional Named Representatives submit the attached Memorandum of Law and the Declarations of Daniel Smith and Richard T. Cassidy.



Dated at Montpelier, Vermont this 24<sup>th</sup> day of March, 2016.

STEPHEN H. TAYLOR and DARREL J. AUBERTINE

BY: s/Daniel Smith  
Daniel Smith, Esq.

Dated at Burlington, Vermont this 24th day of March, 2016.

BY: s/Richard T. Cassidy  
Richard T. Cassidy, Esq.

