

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

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (BMC) (VVP)

THIS DOCUMENT RELATES TO:
All Actions

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT WITH DEFENDANTS AIR CHINA LIMITED AND AIR CHINA
CARGO COMPANY LIMITED**

PLEASE TAKE NOTICE THAT, upon the Declaration of Hollis Salzman in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants Air China Limited and Air China Cargo Company Limited ("Air China"), dated February 5, 2016, along with its supporting exhibit, and the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendants Air China Limited and Air China Cargo Company Limited, dated February 4, 2016, and all other papers and proceedings herein, plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable Brian M. Cogan, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order:

- i. Preliminarily approving the Settlement Agreement between plaintiffs and Air China with an Execution Date of February 4, 2016 (the "Air China Settlement Agreement"), on the grounds that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to the Class;
- ii. Ordering Class Counsel to submit at a later date proposed notices for approval by the Court of the form of notice and the notice plan;
- iii. Approving The Garden City Group as administrator of the settlement, and Citibank as escrow agent; and
- iv. Granting such other and further relief as may be appropriate.

Oral argument on this motion, if any, will be held on a date and time set by the Court.

Dated: February 5, 2016

Robert N. Kaplan
Gregory K. Arenson
Elana Katcher
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022
(212) 687-1980

Gary L. Specks
KAPLAN FOX & KILSHEIMER LLP
423 Sumac Road
Highland Park, IL 60035
(847) 831-1585

By: /s/ Robert N. Kaplan

Michael D. Hausfeld
Brent W. Landau
Hilary K. Scherrer
Melinda Coolidge
HAUSFELD LLP
1700 K Street, N.W., Suite 650
Washington, DC 20006
(202) 540-7200

By: /s/ Michael D. Hausfeld

Hollis Salzman
Meegan Hollywood
ROBINS KAPLAN LLP
601 Lexington Avenue, Suite 3400
New York, NY 10022
(212) 980-7400

By: /s/ Hollis L. Salzman

Howard J. Sedran
Austin B. Cohen
Keith J. Verrier
LEVIN, FISHBEIN, SEDRAN
& BERMAN
510 Walnut Street
Philadelphia, PA 19106
(215) 592-1500

By: /s/ Howard J. Sedran

Class Counsel