

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

**IN RE: URETHANE ANTITRUST
LITIGATION**

**MDL 1616
Civil No. 04-md-01616-JWL**

**This Document Relates To:
The Polyether Polyol Cases**

**CLASS PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT WITH THE DOW CHEMICAL COMPANY**

Class Plaintiffs, through their counsel, move the Court pursuant to Federal Rule of Civil Procedure 23(c) and (e) for an Order preliminarily approving a proposed settlement with defendant The Dow Chemical Company (“Dow”) and authorizing the dissemination of notice to the certified class.

In support of this Motion, Class Plaintiffs rely upon and incorporate by reference herein the facts and legal arguments set forth in the accompanying Memorandum of Law.

Dow does not oppose this Motion.

Dated: March 24, 2016

Respectfully submitted,

/s/ Robert W. Coykendall

Robert W. Coykendall, #10137

Roger N. Walter, #08620

**Morris, Laing, Evans, Brock & Kennedy,
Chartered**

Old Town Square

300 North Mead - Suite 200

Wichita, KS 67202

Tel: (316) 262-2671

Class Plaintiffs' Liaison Counsel

Donald L. Perelman

Roberta D. Liebenberg

Gerard A. Dever

Paul Costa

Matthew Duncan

Fine, Kaplan and Black, R.P.C.

One South Broad Street, 23rd Floor

Philadelphia, PA 19107

Tel: (215) 567-6565

Class Plaintiffs' Co-Lead Counsel

Joseph Goldberg

Freedman Boyd Hollander Goldberg

Urias & Ward P.A.

20 First Plaza Center NW, Suite 700

Albuquerque, NM 87102

Tel: (505) 842-9960

Paul D. Clement

Jeffrey M. Harris

Bancroft PLLC

500 New Jersey Avenue, NW

Seventh Floor

Washington, DC 20001

Tel: (202) 234-0090

Richard A. Koffman

Kit A. Pierson

Christopher J. Cormier

Sharon K. Robertson

Laura M. Alexander

Cohen, Milstein, Sellers & Toll PLLC

1100 New York Avenue, N.W.

Suite 500, West Tower

Washington, DC 20005

Tel: (202) 408-4600

Class Plaintiffs' Co-Lead Counsel

Michael J. Guzman

Rebecca A. Beynon

Michael N. Nemelka

**Kellogg Huber Hansen Todd Evans &
Figel, PLLC**

1615 M Street, NW, Suite 400

Washington, DC 20038

Tel: (202) 326-7900

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 2016, I caused the foregoing Class Plaintiffs' Motion for Preliminary Approval of Settlement with The Dow Chemical Company to be filed electronically with the Clerk of the Court by using the CM/ECF system which will send notice of electronic filing to all counsel who have registered for receipt of documents filed in this matter.

/s/ Robert W. Coykendall

Robert W. Coykendall