

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

COMMISSIONERS OF PUBLIC WORKS OF)	Civil Action No. 2:21-cv-00042-RMG
THE CITY OF CHARLESTON (d.b.a.)	
Charleston Water System), Individually and on)	<u>CLASS ACTION</u>
Behalf of All Others Similarly Situated,)	
Plaintiff,)	MOTION FOR FINAL APPROVAL OF
vs.)	CLASS ACTION SETTLEMENT AND AN
)	AWARD OF ATTORNEYS' FEES AND
)	EXPENSES
COSTCO WHOLESALE CORPORATION,)	
CVS HEALTH CORPORATION,)	
KIMBERLY-CLARK CORPORATION, THE)	
PROCTER & GAMBLE COMPANY,)	
TARGET CORPORATION, WALGREEN)	
CO. and WAL-MART, INC.,)	
Defendants.)	
_____)	

PLEASE TAKE NOTICE that Plaintiff, the Commissioners of Public Works of the City of Charleston (d.b.a. "Charleston Water System") ("Plaintiff"), on behalf of itself and all other Settlement Class Members, through Class Counsel Robbins Geller Rudman & Dowd LLP ("Robbins Geller") and AquaLaw PLC ("AquaLaw"), will move this Court on January 24, 2022 at 10:00 a.m., before The Honorable Richard M. Gergel, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of a Final Order and Judgment approving the proposed Settlement as fair, reasonable, and adequate and finally certifying the Settlement Class. Class Counsel will also move this Court for an order awarding the requested attorneys' fees and expenses.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff submits and is filing herewith: (i) Plaintiff's Memorandum of Law in Support of: (1) Plaintiffs' Motion for Final Approval of Class Action Settlement; and (2) Class Counsel's Application for an Award of Attorneys' Fees and Expenses; (ii) the Joint Declaration of Vincent M. Serra and F. Paul Calamita in Support of Plaintiff's Motion for Final Approval of Class Action Settlement and an Award of Attorneys' Fees and Expenses; (iii) the Declaration of Vincent M. Serra Filed on Behalf of Robbins Geller in Support of Application for Award of Attorneys' Fees and Expenses; (iv) the Declaration of Frank P. Calamita Filed on Behalf of AquaLaw in Support of Application for Award of Attorneys' Fees and Expenses; (v) the Declaration of Kin Hill on Behalf of Charleston Water System; and (vi) the Declaration of Ross D. Murray Regarding Notice Dissemination and Publication.

Proposed Orders will be submitted with Plaintiff's reply submission after the deadlines for objecting and seeking exclusion have passed.

DATED: December 13, 2021

AQUALAW PLC
F. PAUL CALAMITA (ID #12740)

/s/ F. Paul Calamita
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