

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

IN RE BAXTER INTERNATIONAL INC.
SECURITIES LITIGATION

Case No. 1:19-cv-07786

District Judge Sara L. Ellis

Magistrate Judge Jeffrey I. Cummings

**LEAD COUNSEL'S MOTION FOR
ATTORNEYS' FEES AND LITIGATION EXPENSES**

Lead Counsel, Bernstein Litowitz Berger & Grossmann LLP and Kessler Topaz Meltzer & Check, LLP, respectfully move this Court, under Rules 23(e) and 23(h) of the Federal Rules of Civil Procedure, for entry of an Order awarding attorneys' fees and Litigation Expenses.¹

This Motion is based upon (a) the Joint Declaration of James A. Harrod and Sharan Nirmul in Support of (I) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation and (II) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses, (b) the Memorandum of Law in Support of Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses, and (c) all other papers and proceedings herein. A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: July 6, 2021

Respectfully submitted,

**KESSLER TOPAZ
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¹ All capitalized terms not defined herein have the meanings ascribed to them in the Stipulation and Agreement of Settlement dated April 1, 2021 (ECF No. 57-1).

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-and-

/s/ James A. Harrod

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Settlement Class*