

Kimberly A. Justice (*pro hac vice*)
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*Interim Co-Lead Counsel for End-User
Plaintiffs*

[Additional Attorneys on Signature Page]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST
LITIGATION**

Case No. 2:23-cv-16127-WJM-JSA

NOTICE OF MOTION

To: All persons on ECF service list

COUNSEL:

PLEASE TAKE NOTICE that at the Fairness Hearing set by the Court for September 15, 2026 at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel for End-User Plaintiffs Alethea Andrews, Charlette Atencio, Maria Barron, Apostle Cynthia Bolden, Douglas Borowski, Terry Brown, Mandy Bryant, Liridon Camaj, Scott Carpenter, Casey Christensen, Joseph Collins, Sophia Dashab, Matthew DeNapoles, Brian Depperschmidt, Letia Dickerson, Paula DiCianno, Mirlinda Elmazi, Jodie Elmore, Dana Evans, Alex Greenzweig, Shan Greer, Andrea Hogan, Jessica Howe, Suzen Isai, Phyllis Jackson, Samuel Johnson, Jasmine Judy, Tiffnie Kitchens, Sandra Kluessendorf, Nancy Koepke, Arlinda Kongoli, Isaac Landreth, Nicole Langlo, Brandy Littrell, Monica Lord, Kionna Love, Stephen Mack, Alana Manuia, Leslee Martin, Michele Matheny, Jennifer McGehee, Milan Montano, Havva Murtishi, Daniel Nabavian, Frank Novak, Nicole Padilla, Carmen Pelliteri, Yvonne Peychal, Eleanor Pressler, Mary Peterson, Cynthia Reese, Christine Schorr, Masees Skenderian, Berniece Van Der Berg, Elli Ward, Kimberly Webb, Tonia West, and Charlotte Williams (collectively “EUPs”) shall move before the Honorable William J. Martini, U.S.D.J., at the Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, N.J. 07102, Courtroom 4B, for entry of an Order granting reimbursement of litigation expenses incurred to date and approving a set aside for future litigation expenses in connection with the settlement

reached between EUPs and Defendant International Flavors & Fragrances, Inc. (“IFF”) in the above-captioned consolidated action (“Consolidated Action”).

EUPs respectfully request that the Court:

- Approve reimbursement of \$165,878.65 in costs and expenses reasonably and actually incurred through March 31, 2026 by EUP counsel in connection with prosecuting this Action, to be paid from the IFF Settlement Fund;
- Approve \$299,308.74 in notice and administration costs and expenses reasonably and actually incurred by Epiq through May 2026, to be paid from the Settlement Fund, together with a holdback of \$34,000 for additional administration fees and expenses anticipated to be incurred;
- Approve a set aside of \$1 million from the IFF Settlement Fund for future litigation costs and expenses as the Action against the Non-Settling Defendants continues; and
- Grant such other and further relief as the Court deems just and proper.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h), the Preliminary Approval Order (ECF No. 207), and the terms of the Settlement Agreement (ECF No. 200-3), which provide for the payment from the Settlement Fund of costs and expenses reasonably and actually incurred in prosecuting the Action and in connection with settlement notice and administration. The Court-

approved Notice informed Settlement Class Members of these requests and of their right to object. This motion is supported by the accompanying memorandum of law; the Declaration of Kimberly A. Justice; the declarations of EUP counsel firms regarding unreimbursed litigation expenses; the Declaration of Cameron R. Azari, Esq. Regarding Commencement of Notice Plan (filed with the Motion for Final Approval); and all prior proceedings herein. A proposed form of order is submitted herewith.

Dated: June 12, 2026

Respectfully submitted:

By: /s/ Kimberly A. Justice

Kimberly A. Justice (*pro hac vice*)

JUSTICE JAGHER LONDON

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By: /s/ Kellie Lerner

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*Interim Co-Lead Counsel for End-
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By: /s/ Michael D. Fitzgerald

Michael D. Fitzgerald

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*Liaison Counsel for End-User
Plaintiffs*

CERTIFICATE OF SERVICE

The undersigned attorney of record hereby certifies that on this date, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which will cause notice and a copy of this filing to be served upon all counsel of record.

Dated: June 12, 2026

Respectfully submitted,

/s/ Kimberly A. Justice

Kimberly A. Justice (*pro hac vice*)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST
LITIGATION

Civil Action No: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**END-USER PLAINTIFFS' MEMORANDUM OF LAW
IN SUPPORT OF MOTION FOR REIMBURSEMENT OF LITIGATION
EXPENSES AND SET ASIDE FOR FUTURE LITIGATION EXPENSES**

End-User Plaintiffs ("EUPs"),¹ on behalf of the End-User Settlement Class ("EUP Settlement Class" or "Settlement Class"), seek (i) reimbursement of \$165,878.65 in litigation costs and expenses reasonably and actually incurred by Plaintiffs' counsel, through March 31, 2026, in prosecuting the above-captioned action (the "Action"); (ii) approval of \$299,308.74 in notice and administration costs and expenses reasonably and actually incurred by Epiq through May 2026, to be paid

¹ End-User Plaintiffs are Alethea Andrews, Charlette Atencio, Maria Barron, Apostle Cynthia Bolden, Douglas Borowski, Terry Brown, Mandy Bryant, Liridon Camaj, Scott Carpenter, Casey Christensen, Joseph Collins, Sophia Dashab, Matthew DeNapoles, Brian Depperschmidt, Letia Dickerson, Paula DiCianno, Mirlinda Elmazi, Jodie Elmore, Dana Evans, Alex Greenzweig, Shan Greer, Andrea Hogan, Jessica Howe, Suzen Isai, Phyllis Jackson, Samuel Johnson, Jasmine Judy, Tiffnie Kitchens, Sandra Kluessendorf, Nancy Koepke, Arlinda Kongoli, Isaac Landreth, Nicole Langlo, Brandy Littrell, Monica Lord, Kionna Love, Stephen Mack, Alana Manuia, Leslee Martin, Michele Matheny, Jennifer McGehee, Milan Montano, Havva Murtishi, Daniel Nabavian, Frank Novak, Nicole Padilla, Carmen Pelliteri, Yvonne Peychal, Eleanor Pressler, Mary Peterson, Cynthia Reese, Christine Schorr, Masees Skenderian, Berniece Van Der Berg, Elli Ward, Kimberly Webb, Tonia West, and Charlotte Williams.

from the Settlement Fund, together with a holdback of \$34,000 for additional notice and administration fees and expenses Epiq anticipates incurring; and (iii) a set aside of \$1 million for future litigation costs and expenses as the Action against the Non-Settling Defendants continues.²

Over the past two years, Class Counsel has led this litigation on every front. As detailed more fully below, Class Counsel spent significant time and resources in, among other things, extensively investigating, initiating, and bringing this Action; litigating multiple motions to dismiss; and conducting discovery and related motion practice.

I. BACKGROUND

A. Counsel for EUPs Have Advanced Meaningful Resources to Obtain the IFF Settlement in this Litigation.

Antitrust litigation is inherently risky, with high stakes, and the outcome of this litigation has been far from certain. From the outset, Class Counsel worked on a contingent basis to advance the claims of end-user purchasers of fragrance-containing products. While working efficiently, they could not have effectively

² Capitalized terms not otherwise defined herein have the meanings ascribed to them in the *End-User Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Settlement with Defendant International Flavors & Fragrances, Inc., Certification of Proposed Settlement Class, and Related Relief*, filed contemporaneously herewith (the "Motion for Final Approval").

represented these class members without the commitment of a substantial amount of time, effort, and money.

Since 2023, Class Counsel have worked tirelessly on this litigation. It has been and will continue to be a huge undertaking as the cases progress through discovery, to class certification, and then to trial if necessary. Counsel for the EUPs have performed the following work to advance these cases, among other things:

- Research and investigation of the fragrance industry and the sale of fragrance products;
- Extensive research on the various aspects of the antitrust and other laws of states across the United States and the District of Columbia, and drafting and editing the initial and amended complaints;
- Analyzed and prepared liability and damages claims against Defendants;
- Collecting and analyzing information including voluminous jurisdictional discovery produced by the Defendants;
- Consultation with economic and other liability and damages experts;
- Drafting and negotiating key case-management documents, protocols, and stipulations;
- Reviewing, in conjunction with the other plaintiff groups, documents produced by Defendants in jurisdictional discovery;

- Defending against Defendants’ motions to dismiss;
- Negotiating discovery issues with defense counsel including innumerable meet-and-confer sessions, each of which required substantial preparation;
- Preparing correspondence with respect to timing, stipulations, and case planning issues;
- Corresponding and attending calls with EUP co-counsel and counsel for other plaintiff classes litigation strategy;
- Holding calls with and obtaining and analyzing documents from dozens of class representatives;
- Engaging in third-party discovery;
- Performing all the tasks necessary to reach the IFF Settlement, including attending mediation, engaging in correspondence, and preparing and finalizing drafts to effectuate the Settlement; and
- Engaging in confirmatory discovery pursuant to Federal Rule of Evidence 408.

See Declaration of Kimberly A. Justice In Support of Motion for Reimbursement of Litigation Expenses and Set Aside for Future Litigation Expenses (“Justice Decl.”)

¶ 11.

B. The IFF Settlement Was Reached After Arms-Length Negotiation and Adversarial Proceedings.

As detailed more fully in Motion for Final Approval, the IFF Settlement was the product of arm's-length negotiations between experienced antitrust counsel and was reached after two and a half years of hard-fought litigation that has included extensive jurisdictional investigation and motion practice. *See* Motion for Final Approval, at 2-4, 15-19. The Settlement is the product of extensive arm's-length negotiations between Class Counsel and IFF's counsel under the guidance of Judge Phillips, an experienced mediator. *Id.* The negotiations, which occurred over a period of approximately six months, were hard fought, conducted in good faith, and resulted in a fair, reasonable, and adequate Settlement, based on Judge Phillips' proposal. *See Declaration of Hon. Layn R. Phillips (Ret.). In Support of Plaintiffs' Motion for Final Approval of Settlement with Defendant International Flavors & Fragrances, Inc., Certification of Proposed Settlement Class, and Related Relief* ("Judge Phillips Declaration") (filed as Exhibit D to the *Declaration of Kimberly A. Justice in Support of End-user Plaintiffs' Motion for Final Approval of Settlement with Defendant International Flavors & Fragrances, Inc., Certification of Proposed Settlement Class, and Related Relief*) ¶¶ 5-6; Motion for Final Approval, at 15-19. Throughout that time, EUP Settlement Class Counsel assessed the risks and benefits of continued litigation with IFF in comparison to the proposed Settlement. Motion for Final Approval, at 18-19. While full merits discovery has just begun, EUP

Settlement Class Counsel engaged in extensive jurisdictional discovery, attending innumerable meet and-confer sessions with Defendants and reviewing the available production to date. Settlement Class Counsel also engaged in confirmatory discovery pursuant to Federal Rule of Evidence 408 and completed substantial independent factual and legal research, including with the engagement of experts, so that EUPs could be more informed as to the relative strengths and weaknesses of their case, enabling them to have sufficient information to reach a fair, reasonable, and adequate settlement. *Id.* at 23.

On April 28, 2026, the Court preliminarily approved the Settlement, preliminarily certified the EUP Settlement Class, and appointed EUP Settlement Class Counsel and EUP Settlement Class Representatives. ECF No. 207 (“Prelim. Appr. Order”). The Court also approved the Notice Plan and form and content of notices to be provided to the EUP Settlement Class and appointed Epiq as Claims Administrator for the purpose of administering the Notice Plan. Prelim. Appr. Order at 4. On June 12, 2026, Class Counsel submitted its motion for final approval of the IFF Settlement.

The IFF Settlement provides for a Settlement Fund of \$11 million, as well as significant and important cooperation from IFF. In exchange, EUPs and the EUP Settlement Class agree to release all claims against IFF that arise out of or relate to the conduct alleged in this litigation. Settlement Agreement (ECF No. 200-3) ¶¶ 4-

11; Motion for Final Approval, at 5-9. The proposed Settlement is an excellent result for the Class and is well within the range of reasonableness. It is in the best interest of the proposed Settlement Class Members, is fair, reasonable, and adequate. *See generally* Motion for Final Approval.

II. ARGUMENT

A. Standard of Review for Reimbursement of Expenses and Set Aside for Future Litigation Expenses.

District courts may award reasonable attorneys' fees and expenses from the settlement of a class action upon motion under Fed. R. Civ. P. 23(h), which provides that "[i]n a certified class action, the court may award reasonable attorney's fees and non-taxable costs that are authorized . . . by law." Class action attorneys who create a common fund for the benefit of a class are entitled to "reimbursement of reasonable litigation expenses from the fund." *In re Wawa, Inc. Data Sec. Litig.*, No. CV 19-6019, 2024 WL 1557366, at *22 (E.D. Pa. Apr. 9, 2024), *aff'd*, 141 F.4th 456 (3d Cir. 2025); *In re Lucent Techs., Inc., Sec. Litig.*, 327 F. Supp. 2d 426, 444-45 (D.N.J. 2004) (accord). Set asides for future litigation expenses are similarly appropriate and frequently approved by courts in these circumstances, as detailed more fully below. *E.g. In re Linerboard Antitrust Litig.*, 292 F. Supp. 2d 631, 643 (E.D. Pa. 2003) (concluding that a partial "settlement provides class plaintiffs with an immediate financial recovery that ensures funding to pursue the litigation against the non-settling defendants").

B. The Court Should Reimburse Class Counsel for Unreimbursed Past Expenses and Should Approve a Set Aside for Future Litigation Expenses.

Having achieved the settlement currently before the Court, counsel for the EUPs should be awarded the amount of the unreimbursed litigation expenses incurred in prosecuting this litigation through March 31, 2026. Class Counsel also request that the Court authorize counsel to set aside \$1 million of the current settlement proceeds to be used for future litigation expenses in prosecuting the Action against the non-settling Defendants.

1) Reimbursement of Costs Already Incurred

Unreimbursed litigation expenses, incurred through March 31, 2026, in prosecuting the Action should be awarded to counsel for the EUPs. *See, e.g.*, Fed. R. Civ. P. 23(h); *In re Delphi Corp. Sec. Derivative & ERISA Litig.*, 248 F.R.D. 483, 504 (E.D. Mich. 2008) (“Under the common fund doctrine, class counsel are entitled to reimbursement of all reasonable out-of-pocket litigation expenses and costs in the prosecution of claims and in obtaining settlement, including expenses incurred in connection with document production, consulting with experts and consultants, travel and other litigation-related expenses.”) (citation and internal quotation marks omitted); *In re Wawa*, 2024 WL 1557366, at *22 (“Attorneys who create a common fund for the benefit of a class are entitled to reimbursement of reasonable litigation

expenses from the fund.”); *In re Lucent Techs., Inc., Sec. Litig.*, 327 F. Supp. 2d at 444-45 (accord).

Counsel for the EUPs have funded the expenses required to advance this litigation. Justice Decl. ¶¶ 14-26. Since beginning their investigation through March 31, 2026, Plaintiffs’ Counsel have advanced \$165,878.65 to this Action for the benefit of the Settlement Class without any guarantee of payment. *Id.* ¶ 22. These costs include expenses related to experts, document gathering and production, domestic travel, and other reasonable litigation expenses. *Id.* ¶ 24. Further, Epiq has incurred \$299,308.74 in notice and settlement administration fees and expenses through May 2026. Justice Decl. ¶ 27; *Declaration of Cameron R. Azari, Esq. Regarding Commencement of Notice Plan* (filed as Exhibit C to the *Declaration of Kimberly A. Justice in Support of End-user Plaintiffs’ Motion for Final Approval of Settlement with Defendant International Flavors & Fragrances, Inc., Certification of Proposed Settlement Class, and Related Relief*) (“Azari Declaration”) ¶ 26. The Settlement Agreement authorizes Co-Lead Counsel to pay \$300,000 in Class Notice costs from the Settlement Fund prior to final approval, Settlement Agreement ¶ 17, and EUPs now seek the Court’s approval of all notice and administration costs incurred to date. Epiq further requests a holdback of \$34,000 for the additional administration fees and expenses it anticipates incurring leading up to and following the Final Approval Hearing. Azari Declaration ¶ 26. Counsel’s unreimbursed

litigation expenses are properly awarded, and Epiq’s notice and administration costs properly approved for payment, from the IFF Settlement Fund. *See* Settlement Agreement ¶¶ 15-17, 25, 30.

2) Future Litigation Expenses

EUP Settlement Class Counsel request that \$1 million be set aside from the IFF Settlement and be used to pay future expenses in this Action against the Non-Settling Defendants. Allowing a portion of the settlement funds to be used for future expenses is a well-accepted practice. *See, e.g., In re Packaged Ice Antitrust Litig.*, 08-MD-01952, 2011 WL 717519, at *13-14 (E.D. Mich. Feb. 22, 2011) (approving class counsel’s request to use proceeds from early settlement to pay litigation expenses); *see also* Manual for Complex Litigation (Fourth) at § 13.21 (“[p]artial settlements may provide funds needed to pursue the litigation”); *In re Linerboard Antitrust Litig.*, 292 F. Supp. 2d 631, 643 (E.D. Pa. 2003) (concluding that a partial “settlement provides class plaintiffs with an immediate financial recovery that ensures funding to pursue the litigation against the non-settling defendants”); *Newby v. Enron Corp.*, 394 F.3d 296, 302-03 (5th Cir. 2004) (affirming 37.5% set aside for establishment of a \$15 million litigation expense fund from the proceeds of a partial settlement); *In re Pressure Sensitive Labelstock Antitrust Litig.*, 584 F. Supp. 2d 697, 702 (M.D. Pa. 2008) (approving request to set aside to pay outstanding and future litigation costs); *In re WorldCom, Inc. Sec. Litig.*, No. 02 CIV

3288 (DLC), 2004 WL 2591402, at *22 (S.D.N.Y. Nov. 12, 2004) (creating a \$5 million fund for the continuation of litigation against non-settling defendants); *In re California Micro Devices Sec. Litig.*, 965 F. Supp. 1327, 1337 (N.D. Cal. 1997) (approving 7.9% of approximately \$19 million settlement fund for future litigation expenses).

In total, approximately \$465,187.39 in reasonable litigation and administration expenses have been incurred to date (not including the \$34,000 holdback requested for Epiq's anticipated additional notice and administration fees and expenses). Justice Decl. ¶ 29. The size and complexity of this litigation has already necessitated significant expenses, as set forth above, and, as the case progresses to class certification, the expenses—particularly those associated with experts—will increase exponentially. *Id.* In antitrust cases, experts typically create economic and damages models that describe the mechanisms and impact of the anti-competitive behavior. *Id.* Given the scope and complexity of the issues in these cases, Class Counsel expect that the future cost of this work by their experts will be in the millions of dollars. *Id.*

In addition, Class Counsel expect to incur significant costs related to ongoing discovery from class representatives, Defendants and their representatives, and third parties. These costs include the significant expense of hosting and reviewing documents and data, as well as travel expenses for depositions. Justice Decl. ¶ 30.

Class Counsel therefore believe that the amount they are requesting be set aside for future expenses is reasonable. *Id.*

III. CONCLUSION

For the foregoing reasons, Class Counsel respectfully request that the Court grant their motion and approve (i) reimbursement of \$165,878.65 in litigation costs and expenses incurred by Plaintiffs' Counsel; (ii) approval of \$299,308.74 in notice and settlement administration costs incurred by Epiq and to be paid from the Settlement Fund, together with a \$34,000 holdback for Epiq's anticipated additional administration fees and expenses, without prejudice to approval of the Claims Administrator's remaining fees and expenses in connection with the Class Distribution Order pursuant to ¶ 47 of the Settlement Agreement; and (iii) a set aside of \$1 million for future litigation costs and expenses as the Action against the Non-Settling Defendants continues.

Dated: June 12, 2026

Respectfully submitted,

Michael D. Fitzgerald
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By: /s/ Kimberly A. Justice
Kimberly A. Justice (*pro hac vice*)
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*Interim Co-Lead Counsel for End-
User Plaintiffs*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST
LITIGATION

Civil Action No: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF KIMBERLY A. JUSTICE
IN SUPPORT OF MOTION FOR REIMBURSEMENT OF LITIGATION
EXPENSES AND SET ASIDE FOR FUTURE LITIGATION EXPENSES**

I, Kimberly A. Justice, declare as follows:

1. I am a partner at the law firm of Justice Jagher London & Millen LLC (“JJLM”). I make this declaration in support of *End-User Plaintiffs’ Motion for Reimbursement of Litigation Expenses and Set Aside for Future Litigation Expenses* (the “Motion”). I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. I was appointed Interim Co-Lead Class Counsel in this Action, together with Kellie Lerner of Shinder Cantor Lerner LLP, my Co-Lead Counsel (collectively, “Class Counsel”). The Court also appointed Michael D. Fitzgerald of the Law Offices of Michael D. Fitzgerald as Liaison Counsel. We, along with attorneys from our firms, and with the assistance of attorneys from a number of other law firms (collectively, “Plaintiffs’ Counsel”), have vigorously and efficiently prosecuted this complex case. Class Counsel deployed the talents and resources of Plaintiffs’ Counsel, where necessary, ensuring that sufficient attorney resources were dedicated to prosecuting the Action efficiently. All work in this Action was directed by Class Counsel.

3. Subject to this Court's approval, Plaintiffs, on behalf of the End-User Plaintiffs ("EUPs" or the "Class"),¹ have agreed to resolve and release claims against IFF. Details of this settlement are provided in my *Declaration in Support of End-User Plaintiffs' Motion for Final Approval of Settlement with Defendant International Flavors & Fragrances, Inc., Certification of Proposed Settlement Class, and Related Relief*, filed contemporaneously herewith. It is my opinion that the Settlement Agreement represents an exceptional recovery for the Class. The Settlement Agreement is the result of Class Counsel's skillful and dedicated work spanning over two years in this complex Action.

4. At this time, Plaintiffs' Counsel seek reimbursement of reasonable and necessary litigation expenses incurred in the amount of \$165,878.65, to be paid from the Settlement Fund. Plaintiffs' Counsel also seek approval of \$299,308.74 in reasonable and necessary notice and settlement administration costs incurred by Epiq, to be paid from the Settlement Fund, together with a \$34,000 holdback for additional administration fees and expenses Epiq anticipates incurring.

5. Class Counsel further seek \$1 million to be set aside from the IFF Settlement and to be used to pay future expenses expected to be incurred in continuing to prosecute this Action against the Non-Settling Defendants. I expect

¹ Unless otherwise stated, capitalized defined terms used herein have the meanings ascribed in the Settlement Agreement (ECF No. 200-3).

these expenses to include costs for document hosting, depositions, and expert analysis.

6. In support of these requests, I describe the following aspects of this litigation: Plaintiffs' Counsel's time and expense reporting procedures, work done to date, and the total interim expenses incurred to date.

PLAINTIFFS' COUNSEL'S TIME AND EXPENSE INVESTED IN THIS ACTION

A. Time and Expense Reporting Procedures

7. As Class Counsel, JJLM is responsible for collecting all Plaintiffs' Counsel's contemporaneously prepared time and expense reports.

8. Shortly after being appointed as Class Counsel, I instituted Protocols and Limitations for Work Performed and Expenses Incurred ("T&E Protocol") for the efficient prosecution of the Consolidated Action. I provided the T&E Protocol to each plaintiff firm who participated in the prosecution of this Action and whose expenses are included in this Motion.

9. The T&E Protocol requires each firm to record and submit paid expenses monthly and retain receipts for inspection.

10. The submitted expense entries have been reviewed by JJLM and as appropriate, any adjustments and revisions were requested to ensure compliance with the T&E Protocol.

B. Work Done by All Plaintiffs Counsel

11. Counsel for the EUPs have performed the following work to advance this case, among other things:

- Research and investigation of the fragrance industry and the sale of fragrance products;
- Extensive research on the various aspects of the antitrust and other laws of states across the United States and the District of Columbia, and drafting and editing the initial and amended complaints;
- Analyzed and prepared liability and damages claims against Defendants;
- Collecting and analyzing information including voluminous jurisdictional discovery produced by the Defendants;
- Consultation with economic and other liability and damages experts;
- Drafting and negotiating key case-management documents, protocols, and stipulations;
- Reviewing, in conjunction with the other plaintiff groups, documents produced by Defendants in jurisdictional discovery;
- Defending against Defendants' motions to dismiss;

- Negotiating discovery issues with defense counsel including innumerable meet-and-confer sessions, each of which required substantial preparation;
- Preparing correspondence with respect to timing, stipulations, and case planning issues;
- Corresponding and attending calls with EUP co-counsel and counsel for other plaintiff classes litigation strategy;
- Holding calls with and obtaining and analyzing documents from dozens of class representatives;
- Engaging in third-party discovery;
- Performing all the tasks necessary to reach the IFF Settlement, including attending mediation, engaging in correspondence, and preparing and finalizing drafts to effectuate the Settlement; and
- Engaging in confirmatory discovery pursuant to Federal Rule of Evidence 408.

C. JJLM's Unreimbursed Costs and Expenses

12. Attached as Exhibit A is a summary of the expenses JJLM has incurred from case inception to March 31, 2026, by category. JJLM's total expenses are \$32,659.74. These expenses have not been reimbursed.

13. The expenses in this declaration are reflected in JJLM's accounting records. Exhibit A was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation. If requested, I could provide receipts or other supporting records for each expense included on Exhibit A. The amount of JJLM's expenses is reasonable and was necessary for the efficient and effective prosecution of this matter. The expenses submitted are of a type normally charged to and paid by fee-paying clients.

D. Plaintiffs' Counsel's Unreimbursed Costs and Expenses

14. In prosecuting this litigation, Plaintiffs' Counsel litigated this matter purely on a contingent basis, advancing all necessary expenses with no guarantee of payment.

15. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Kellie Lerner on behalf of Shinder Cantor Lerner LLP.

16. Attached hereto as Exhibit C is a true and correct copy of the Declaration of Shpetim Ademi on behalf of ADEMI LLP.

17. Attached hereto as Exhibit D is a true and correct copy of the Declaration of Justin S. Nematzadeh on behalf of Nematzadeh PLLC.

18. Attached hereto as Exhibit E is a true and correct copy of the Declaration of Dana R. Vogel on behalf of McCune Law Group APC.

19. Attached hereto as Exhibit F is a true and correct copy of the Declaration of William G. Caldes on behalf of Spector, Roseman & Kodroff, P.C.

20. Attached hereto as Exhibit G is a true and correct copy of the Declaration of Garrett D. Blanchfield on behalf of Reinhardt Wendorf & Blanchfield.

21. Attached hereto as Exhibit H is a true and correct copy of the Declaration of Ellen G. Jalkut on behalf of Robins Kaplan LLP.

22. As of March 31, 2026, Plaintiffs' Counsel incurred \$165,878.65 for which they respectfully request reimbursement, as follows:²

Table 1: Plaintiffs' Counsel Summary of Expenses		
Firm	Expenses	Reference
Justice Jagher London & Millen LLC	\$32,659.74	Justice Decl. ¶ 14
Shinder Cantor Lerner LLP	\$1,344.00	Lerner Decl. ¶ 4
ADEMI LLP	\$15,000	Ademi Decl. ¶ 4
Nematzadeh PLLC	\$15,000	Nematzadeh Decl. ¶ 4
McCune Law Group APC	\$15,000	Vogel Decl. ¶ 4
Spector, Roseman & Kodroff, P.C.	\$22,730.97	Caldes Decl. ¶ 4
Reinhardt Wendorf & Blanchfield	\$15,049.45	Blanchfield Decl. ¶ 4
Robins Kaplan LLP	\$49,094.49	Jalkut Decl. ¶ 4
TOTAL	\$165,878.65	

² Several Plaintiffs' Counsel firms, including Liaison Counsel, have not yet incurred any expenses and are thus not represented in Table 1.

23. These expenses are supported by the contemporaneous records maintained by each of Plaintiffs' Counsel's firms.

24. These costs include expenses related to experts, document gathering and production, legal research, domestic travel, discovery-related expenditures, and other reasonable litigation expenses.

25. The \$165,878.65 in expenses incurred and paid by Plaintiffs' Counsel were reasonable and necessary to the successful prosecution of this Action, including the creation of the Settlement relief.

26. Due to the risk that they might never be recovered, Plaintiffs' Counsel endeavored to keep expenses to a minimum.

COST OF NOTICE AND ADMINISTRATION

27. Through May 2026, administration fees and expenses incurred by Epiq Class Action & Claims Solutions, Inc. ("Epiq") total \$299,308.74, which is inclusive of the costs to implement the Notice Plan and handle settlement administration to date. *Declaration of Cameron R. Azari, Esq. Regarding Commencement of Notice Plan* (filed as Exhibit C to the *Declaration of Kimberly A. Justice in Support of End-user Plaintiffs' Motion for Final Approval of Settlement with Defendant International Flavors & Fragrances, Inc., Certification of Proposed Settlement Class, and Related Relief*) ("Azari Declaration") ¶ 26. Based on the current scope of settlement administration, Epiq anticipates additional fees and expenses will be

incurred to complete the settlement administration, leading up to and following the Final Approval Hearing. *Id.* In addition to the \$299,308.74 in fees already incurred, Epiq also respectfully requests that the Court award a holdback of \$34,000 for additional administration fees and expenses that Epiq anticipates will be incurred for ongoing notice and administration. *Id.*

SET ASIDE

28. Class Counsel request that \$1 million be set aside from the IFF Settlement and be used to pay future expenses in this Action against the Non-Settling Defendants. Class Counsel will maintain records of all expenditures from the set aside and account for the set aside in connection with any future application for reimbursement of expenses or an award of attorneys' fees.

29. As described, approximately \$465,187.39 in reasonable litigation and administration expenses have been incurred to date (not including the \$34,000 holdback requested for Epiq's anticipated additional notice and administration fees and expenses). The size and complexity of this litigation has already necessitated significant expenses, as set forth above, and, as the case progresses to class certification, the expenses—particularly those associated with experts—will increase exponentially. In antitrust cases, experts typically create economic and damages models that describe the mechanisms and impact of the anti-competitive behavior. Given the scope and complexity of the issues in this case, I expect that the

future cost of this work by Plaintiffs' experts will be in the millions of dollars, easily exceeding the requested set aside of \$1 million.

30. In addition, I expect that Plaintiffs' Counsel will incur significant costs related to ongoing discovery from class representatives, Defendants and their representatives, and third-parties. These costs include the significant expense of hosting and reviewing documents and data, as well as travel expenses for depositions. I therefore believe that the amount requested in set aside for future expenses is reasonable.

CONCLUSION

31. Since beginning their investigation, through March 31, 2026, Plaintiffs' Counsel have advanced \$165,878.65 to this Action without any guarantee of payment. Epiq has incurred \$299,308.74 in notice and settlement administration fees and expenses through May 2026 and requests a \$34,000 holdback for the additional fees and expenses it anticipates incurring.

32. Plaintiffs' Counsel bore the risk of litigating this Action entirely on a contingent basis for over two years. There are numerous examples where the plaintiffs' counsel in contingency fee cases have worked thousands of hours and advanced substantial sums of money, only to receive no compensation. Plaintiffs' Counsel were fully aware that despite the most vigorous and competent efforts, a law firm's success in contingent litigation on behalf of a class is never guaranteed.

33. Despite this, Plaintiffs' Counsel ensured that sufficient attorney resources were dedicated to prosecuting the claims here. They also ensured that funds sufficient to pursue and complete such complex litigation were available. Plaintiffs' Counsel's investment of this amount of hard costs demonstrates the commitment, as well as the risk, they were willing to take in prosecuting the Action and protecting Class Members' claims.

34. Based on the significant recovery for the Class and the substantial risks faced by Plaintiffs' Counsel, Class Counsel respectfully submits that the Court should approve reimbursement of litigation expenses in the amount of \$165,878.65 to Plaintiffs' Counsel and approve \$299,308.74 in notice and settlement administration costs incurred by Epiq, to be paid from the Settlement Fund, together with a \$34,000 holdback for additional administration fees and expenses Epiq anticipates incurring.

35. Class Counsel further submits that up to \$1 million be set aside from the IFF Settlement and be used to pay future expenses in this Action against the Non-Settling Defendants.

I, Kimberly A. Justice, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of June 2026 in Conshohocken, Pennsylvania.

/s/ Kimberly A. Justice
Kimberly A. Justice

EXHIBIT A

EXHIBIT A

EXPENSE	AMOUNT
Online Research	\$2,631.74
Out-of-town Travel	\$28.00
Other - Assessments	\$30,000.00
TOTAL	\$32,659.74

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST
LITIGATION**

Case No. 2:23-cv-16127-WJM-JSA

Hon. William J. Martini, U.S.D.J.

Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF KELLIE LERNER IN SUPPORT OF END-USER PLAINTIFFS'
MOTION FOR REIMBURSEMENT OF LITIGATION EXPENSES AND SET-ASIDE
FOR FUTURE LITIGATION EXPENSES ON BEHALF OF SHINDER CANTOR
LERNER LLP**

I, **KELLIE LERNER**, declare as follows:

1. I am Managing Partner at the law firm of Shinder Cantor Lerner LLP (hereinafter "Firm"). I make this declaration in support of End-User Plaintiffs' Motion for Reimbursement of Litigation Expenses and Set-Aside for Future Litigation Expenses on Behalf of my Firm. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. I was appointed Interim Co-Lead Class Counsel in this Action, together with Kimberly A. Justice of Justice Jagher London & Millen LLC, my Co-Lead Counsel. We, along with attorneys from our firms, and with the assistance of attorneys from ten other law firms have vigorously and efficiently prosecuted this complex case.

3. The tasks undertaken by my Firm to date include as follows: (a) ongoing factual investigation and analysis in connection with the allegations made in the consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; (c) drafting discovery requests; (d) reviewing documents produced by Defendants and/or third-parties; (e) responding to Defendants' discovery requests, including working with Plaintiffs to search for documents, and attending meet and confer conferences with Defendants, (f) reviewing

Plaintiffs' documents for production to Defendants; (g) working with experts for purposes of determining damages and liability for purposes of liability, damages, and settlement analysis; (h) preparing for and participating in mediation; and (i) negotiating and drafting the settlement agreement and approval papers, among other tasks in the pursuit of the Plaintiffs' claims.

4. The table below summarizes the expenses SCL has incurred from case inception to March 31, 2026, by category. SCL's total expenses are \$1,344.00. These expenses have not been reimbursed.

Approximate Date of Expense	Description	Expense Amount (U.S.D.)
7/7/2025	Legal research using PACER Service Center	\$43.00
7/29/2025	L. Maher NJ Lawyers' Fund for Client Protection - 2025 PHV admission	\$267.00
7/29/2025	W. Fore NJ Lawyers' Fund for Client Protection - 2025 PHV admission	\$267.00
7/29/2025	L. Maher NJ District Court PHV court filing fee	\$250.00
7/29/2025	W. Fore NJ District Court PHV court filing fee	\$250.00
2/11/2026	W. Fore NJ Lawyers' Fund for Client Protection - 2026 PHV Admission	\$267.00
TOTAL		\$1,344.00

5. The expenses in this declaration are reflected in SCL's accounting records. The table above was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation. If requested, I could provide receipts or other supporting records for each expense

included in the table above. The amount of SCL's expenses is reasonable and was necessary for the efficient and effective prosecution of this matter. The expenses submitted are of a type normally charged to and paid by fee-paying clients.

6. Because this Declaration is submitted in support of Class Counsel's Motion, which is related to and contingent on approval of the Agreement, it is inadmissible in any subsequent proceedings, other than in connection with the Agreement. If the Agreement is not approved by the Court, then this declaration and the statements contained herein are without prejudice to Plaintiffs' position in the Action.

I, Kellie Lerner, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of June 2026 in New York, New York.

/s/ Kellie Lerner

Kellie Lerner

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST LITIGATION

Civil Action No.: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF SHPETIM ADEMI IN SUPPORT OF END-USER PLAINTIFFS'
MOTION FOR REIMBURSEMENT OF LITIGATION EXPENSES AND SET-ASIDE
FOR FUTURE LITIGATION EXPENSES ON BEHALF OF ADEMI LLP**

I, Shpetim Ademi, declare as follows:

1. I am a partner at the law firm of ADEMI LLP (hereinafter "Firm"). I make this declaration in support of End-User Plaintiffs' Motion for Reimbursement of Litigation Expenses and Set-Aside for Future Litigation Expenses on Behalf of ADEMI LLP. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. Throughout the duration of the litigation of this matter, my Firm actively participated in the pursuit of the Plaintiffs' claims at the request of Interim Co-Lead Class Counsel Kimberly A. Justice of Justice Jagher London & Millen LLC and Kellie Lerner of Shinder Cantor Lerner LLP, now appointed as EUP Settlement Class Counsel.

3. The tasks undertaken by my Firm to date include as follows: (a) a factual investigation and analysis in connection with drafting the consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; (c) responding to Defendants' discovery requests, including working with Plaintiffs to search for documents, and attending meet and confer conferences with Defendants, (d) reviewing Plaintiffs' documents for production to Defendants; (k) communicating with multiple plaintiffs regarding case management and updates.

4. Attached as Exhibit A is a summary of the expenses my Firm has incurred from matter inception to March 31, 2026 by category. My Firm's total expenses are \$15,000. These expenses have yet to be reimbursed.

5. The expenses in this declaration are reflected in my Firm's accounting records. Exhibit A was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation through March 31, 2026. If requested, I could provide receipts or other supporting records for each expense included on Exhibit A. The amount of my Firm's expenses is reasonable, and was necessary for the efficient and effective prosecution of this matter. I believe that the expenses submitted are of a type normally charged to and paid by fee-paying clients.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of June 2026 in Cudahy Wisconsin.



Shpetim Ademi

EXHIBIT A

EXPENSE	AMOUNT
Other – Litigation Fund Contribution	\$15,000.00
TOTAL	\$15,000.00

EXHIBIT D

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST LITIGATION

Civil Action No.: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF JUSTIN S. NEMATZAEH IN SUPPORT OF END-USER
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF LITIGATION EXPENSES AND
SET-ASIDE FOR FUTURE LITIGATION EXPENSES ON BEHALF OF
NEMATZADEH PLLC**

I, Justin S. Nematzadeh, declare as follows:

1. I am the founder and managing member of Nematzadeh PLLC (hereinafter "Firm"). I make this declaration in support of End-User Plaintiffs' Motion for Reimbursement of Litigation Expenses and Set-Aside for Future Litigation Expenses on Behalf of Nematzadeh PLLC. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. Throughout the duration of the litigation of this matter, my Firm actively participated in the pursuit of the Plaintiffs' claims at the request of Interim Co-Lead Class Counsel Kimberly A. Justice of Justice Jagher London & Millen LLC and Kellie Lerner of Shinder Cantor Lerner LLP, now appointed as EUP Settlement Class Counsel.

3. The tasks undertaken by my Firm to date include as follows: (a) a factual investigation and analysis in connection with drafting the consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; (c) responding to Defendants' discovery requests, including working with Plaintiffs to search for documents; and (d) reviewing Plaintiffs' documents for production to Defendants.

4. Attached as Exhibit A is a summary of the expenses my Firm has incurred from matter inception to March 31, 2026. by category. My Firm's total expenses are \$15,000.00. These expenses have yet to be reimbursed.

5. The expenses in this declaration are reflected in my Firm's accounting records. Exhibit A was assembled, prepared, and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation through March 31, 2026. If requested, I could provide receipts or other supporting records for each expense included on Exhibit A. The amount of my Firm's expenses is reasonable and was necessary for the efficient and effective prosecution of this matter. I believe that the expenses submitted are of a type normally charged to and paid by fee-paying clients.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of June 2026 in Manhasset, New York.

A handwritten signature in black ink, appearing to read 'Justin S. Nematzadeh', is written over a horizontal line.

Justin S. Nematzadeh
Nematzadeh PLLC

EXHIBIT A

EXPENSE	AMOUNT
Other – Litigation Fund Contribution	\$15,000.00
TOTAL	\$15,000.00

EXHIBIT E

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST LITIGATION

Civil Action No.: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF DANA R. VOGEL IN SUPPORT OF END-USER PLAINTIFFS’
MOTION FOR REIMBURSEMENT OF LITIGATION EXPENSES AND SET-ASIDE
FOR FUTURE LITIGATION EXPENSES ON BEHALF OF MCCUNE LAW GROUP
APC**

I, Dana R. Vogel, declare as follows:

1. I am a practice area leader at the law firm of McCune Law Group APC (hereinafter “Firm”). I make this declaration in support of End-User Plaintiffs’ Motion for Reimbursement of Litigation Expenses and Set-Aside for Future Litigation Expenses on Behalf of McCune Law Group APC. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. Throughout the duration of the litigation of this matter, my Firm actively participated in the pursuit of the Plaintiffs’ claims at the request of Interim Co-Lead Class Counsel Kimberly A. Justice of Justice Jagher London & Millen LLC and Kellie Lerner of Shinder Cantor Lerner LLP, now appointed as EUP Settlement Class Counsel.

3. The tasks undertaken by my Firm to date include as follows: (a) a factual investigation and analysis in connection with drafting the consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; (c) drafting discovery requests; (d) responding to Defendants’ discovery requests, including working with Plaintiffs to search for documents, and attending meet and confer conferences with Defendants, (e) reviewing Plaintiffs’ documents for production to Defendants.

4. Attached as Exhibit A is a summary of the expenses my Firm has incurred from matter inception to March 31, 2026 by category. My Firm's total expenses are \$15,000. These expenses have yet to be reimbursed.

5. The expenses in this declaration are reflected in my Firm's accounting records. Exhibit A was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation through March 31, 2026. If requested, I could provide receipts or other supporting records for each expense included on Exhibit A. The amount of my Firm's expenses is reasonable, and was necessary for the efficient and effective prosecution of this matter. I believe that the expenses submitted are of a type normally charged to and paid by fee-paying clients.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of June 2026 in Phoenix, Arizona.



Dana R. Vogel

EXHIBIT A

EXPENSE	AMOUNT
Other – Litigation Fund Contribution	\$15,000
TOTAL	\$15,000

EXHIBIT F

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST LITIGATION

Civil Action No.: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF WILLIAM G. CALDES IN SUPPORT OF END-USER
PLAINTIFFS' MOTION FOR REIMBURSEMENT OF LITIGATION EXPENSES AND
SET-ASIDE FOR FUTURE LITIGATION EXPENSES ON BEHALF OF
SPECTOR, ROSEMAN & KODROFF, P.C.**

I, William G. Caldes, declare as follows:

1. I am a partner at the law firm of Spector, Roseman & Kodroff, P.C. (hereinafter "Firm"). I make this declaration in support of End-User Plaintiffs' Motion for Reimbursement of Litigation Expenses and Set-Aside for Future Litigation Expenses on Behalf of Spector, Roseman & Kodroff, P.C. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. Throughout the duration of the litigation of this matter, my Firm actively participated in the pursuit of the Plaintiffs' claims at the request of Interim Co-Lead Class Counsel Kimberly A. Justice of Justice Jagher London & Millen LLC and Kellie Lerner of Shinder Cantor Lerner LLP, now appointed as EUP Settlement Class Counsel.

3. The tasks undertaken by my Firm to date include as follows: (a) factual investigation and analysis in connection with drafting the consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; (c) drafting discovery requests; (d) attending meet and confer conferences with Defendants re jurisdictional issues; (e) working with experts for purposes of determining damages and liability for purposes of

liability, damages, and settlement analysis; (f) preparing for and participating in mediation; and (g) negotiating and drafting the settlement agreement and approval papers.

4. Attached as Exhibit A is a summary of the expenses my Firm has incurred from matter inception to March 31, 2026, by category. My Firm's total expenses are \$22,730.97. These expenses have yet to be reimbursed.

5. The expenses in this declaration are reflected in my Firm's accounting records. Exhibit A was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation through March 31, 2026. If requested, I could provide receipts or other supporting records for each expense included on Exhibit A. The amount of my Firm's expenses is reasonable, and was necessary for the efficient and effective prosecution of this matter. I believe that the expenses submitted are of a type normally charged to and paid by fee-paying clients.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of June 2026 in Philadelphia, Pa.



William G. Caldes

EXHIBIT A

EXPENSE	AMOUNT
Copying	\$28.00
Online Research	\$5,339.37
Court/filing Fees	\$2,363.60
Other – Litigation Fund Contribution	\$15,000.00
TOTAL	\$22,730.97

EXHIBIT G

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST LITIGATION

Civil Action No.: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF GARRETT D. BLANCHFEILD IN SUPPORT OF
END-USER PLAINTIFFS' MOTION FOR REIMBURSEMENT OF
LITIGATION EXPENSES AND SET-ASIDE FOR FUTURE LITIGATION EXPENSES
ON BEHALF OF REINHARDT WENDORF & BLANCHFIELD**

I, Garrett D. Blanchfield, declare as follows:

1. I am a partner at the law firm of Reinhardt Wendorf & Blanchfield (hereinafter "Firm"). I make this declaration in support of End-User Plaintiffs' Motion for Reimbursement of Litigation Expenses and Set-Aside for Future Litigation Expenses on Behalf of Reinhardt Wendorf & Blanchfield. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. Throughout the duration of the litigation of this matter, my Firm actively participated in the pursuit of the Plaintiffs' claims at the request of Interim Co-Lead Class Counsel Kimberly A. Justice of Justice Jagher London & Millen LLC and Kellie Lerner of Shinder Cantor Lerner LLP, now appointed as EUP Settlement Class Counsel.

3. The tasks undertaken by my Firm to date include as follows: (a) participation in conferences with co-counsel to discuss case management and litigation strategy; (b) responding to Defendants' discovery requests, including working with Plaintiffs to search for documents, and attending meet and confer conferences with Defendants, and (c) reviewing Plaintiffs' documents for production to Defendants.

4. Attached as Exhibit A is a summary of the expenses my Firm has incurred from matter inception to March 31, 2026 by category. My Firm's total expenses are \$15,049.45. These expenses have yet to be reimbursed.

5. The expenses in this declaration are reflected in my Firm's accounting records. Exhibit A was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation through March 31, 2026. If requested, I could provide receipts or other supporting records for each expense included on Exhibit A. The amount of my Firm's expenses is reasonable, and was necessary for the efficient and effective prosecution of this matter. I believe that the expenses submitted are of a type normally charged to and paid by fee-paying clients.

I declare under penalty of perjury that the foregoing is true and correct. Executed this ___ day of June 2026 in St. Paul, Minnesota.



Garrett D. Blanchfield

EXHIBIT A

EXPENSE	AMOUNT
Online Research	\$49.45
Other – Litigation Fund Contribution	\$15,000
TOTAL	\$15,049.45

EXHIBIT H

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST LITIGATION

Civil Action No.: 2:23-cv-16127-
(WJM)(JSA)

Hon. William J. Martini, U.S.D.J.
Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF ELLEN G. JALKUT IN SUPPORT OF END-USER PLAINTIFFS'
MOTION FOR REIMBURSEMENT OF LITIGATION EXPENSES AND SET-ASIDE
FOR FUTURE LITIGATION EXPENSES ON BEHALF OF ROBINS KAPLAN LLP**

I, Ellen G. Jalkut, declare as follows:

1. I am a counsel at the law firm of Robins Kaplan LLP (hereinafter "Firm"). I make this declaration in support of End-User Plaintiffs' Motion for Reimbursement of Litigation Expenses and Set-Aside for Future Litigation Expenses on Behalf of Robins Kaplan. I have personal knowledge of the information stated within this declaration and, if necessary, I could and would competently testify to this information.

2. Throughout the duration of the litigation of this matter, my Firm actively participated in the pursuit of the Plaintiffs' claims at the request of Interim Co-Lead Class Counsel Kimberly A. Justice of Justice Jagher London & Millen LLC and Kellie Lerner of Shinder Cantor Lerner LLP, now appointed as EUP Settlement Class Counsel.

3. The tasks undertaken by my Firm to date include as follows: (a) a factual investigation and analysis in connection with drafting the consolidated complaint; (b) participation in conferences with co-counsel to discuss case management and litigation strategy; and (c) drafting and opposing motions to dismiss.

4. Attached as Exhibit A is a summary of the expenses my Firm has incurred from matter inception to March 31, 2026 by category. My Firm's total expenses are \$49,094.49. These expenses have yet to be reimbursed.

5. The expenses in this declaration are reflected in my Firm's accounting records. Exhibit A was assembled and prepared by my staff and reviewed by me. The expenses were prepared from receipts, check records, and other source materials. These are accurate records of the expenses. The expenses reflect the costs and charges incurred for work performed throughout this litigation through March 31, 2026. If requested, I could provide receipts or other supporting records for each expense included on Exhibit A. The amount of my Firm's expenses is reasonable, and was necessary for the efficient and effective prosecution of this matter. I believe that the expenses submitted are of a type normally charged to and paid by fee-paying clients.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of June 2026 in New York, New York.

/s/ 
Ellen G. Jalkut

EXHIBIT A

EXPENSE	AMOUNT
Copying	\$373.98
Online Research	\$2,435.17
Delivery services/messengers	\$519.07
Court/filing Fees	\$1,669.02
Other – Service of Process	\$14,097.25
Other – Litigation Fund Contribution	\$30,000.00
TOTAL	\$49,094.49

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST
LITIGATION**

Case No. 2:23-cv-16127-WJM-JSA

**[PROPOSED] ORDER GRANTING
REIMBURSEMENT OF
LITIGATION EXPENSES AND
SET ASIDE FOR FUTURE
LITIGATION EXPENSES**

WILLIAM J. MARTINI, U.S.D.J.:

AND NOW, this ____ day of _____, 2026, upon review and consideration of the End-User Plaintiffs’ (“EUPs”)¹ Motion for Reimbursement of Litigation Expenses and Set Aside for Future Litigation Expenses (the “Motion”) [ECF No. ____], it is hereby ORDERED that the Motion is GRANTED as follows:

¹ EUPs are Alethea Andrews, Charlette Atencio, Maria Barron, Apostle Cynthia Bolden, Douglas Borowski, Terry Brown, Mandy Bryant, Liridon Camaj, Scott Carpenter, Casey Christensen, Joseph Collins, Sophia Dashab, Matthew DeNapoles, Brian Depperschmidt, Letia Dickerson, Paula DiCianno, Mirlinda Elmazi, Jodie Elmore, Dana Evans, Alex Greenzweig, Shan Greer, Andrea Hogan, Jessica Howe, Suzen Isai, Phyllis Jackson, Samuel Johnson, Jasmine Judy, Tiffnie Kitchens, Sandra Kluessendorf, Nancy Koepke, Arlinda Kongoli, Isaac Landreth, Nicole Langlo, Brandy Littrell, Monica Lord, Kionna Love, Stephen Mack, Alana Manuia, Leslee Martin, Michele Matheny, Jennifer McGehee, Milan Montano, Havva Murtishi, Daniel Nabavian, Frank Novak, Nicole Padilla, Carmen Pelliteri, Yvonne Peychal, Eleanor Pressler, Mary Peterson, Cynthia Reese, Christine Schorr, Masees Skenderian, Berniece Van Der Berg, Elli Ward, Kimberly Webb, Tonia West, and Charlotte Williams.

1. All capitalized terms used in this Order shall have the same meanings as set forth in the Settlement Agreement submitted to the Court at ECF No. 200-3.
2. On April 28, 2026, the Court entered the Preliminary Approval Order [ECF No. 207], which provided that EUPs would file any request for reimbursement of costs and expenses and a set aside for future litigation costs and expenses within forty-five (45) days of its entry, and that any EUP Settlement Class Member wishing to object to any such request could do so no later than thirty (30) days before the Fairness Hearing.
3. The Court-approved Notice disseminated to the EUP Settlement Class informed Settlement Class Members that Class Counsel would ask the Court to reimburse costs and expenses and to set aside up to \$1 million for future litigation costs and expenses from the IFF Settlement Fund as the Action against the Non-Settling Defendants continues, and informed Settlement Class Members of their right to object to those requests. Notice of the Motion was therefore directed to the Settlement Class in a reasonable manner, satisfying Federal Rule of Civil Procedure 23(h)(1). [No Settlement Class Member objected to the requests. / The Court has considered the objections received and finds that none is meritorious.]

4. On June 12, 2026, EUPs filed the Motion. On September 15, 2026, the Court held a Fairness Hearing at which the Motion was considered.
5. Pursuant to Federal Rule of Civil Procedure 23(h) and the common fund doctrine, counsel who create a common fund for the benefit of a class are entitled to reimbursement of reasonable out-of-pocket expenses incurred in the litigation. Based on the Declaration of Kimberly A. Justice, the declarations of EUP counsel firms, and the Declaration of Cameron R. Azari, Esq. (filed with the Motion for Final Approval), the Court finds that the expenses for which reimbursement is sought were reasonably and actually incurred in the prosecution of this Action and in connection with settlement notice and administration, for the benefit of the EUP Settlement Class.
6. EUP counsel are awarded reimbursement of \$165,878.65 in costs and expenses reasonably and actually incurred through March 31, 2026 in connection with prosecuting this Action, to be paid from the Settlement Fund in accordance with the Settlement Agreement. This award is without prejudice to future applications for reimbursement of expenses incurred after March 31, 2026.
7. Payment of \$299,308.74 in notice and administration costs incurred by Epiq through May 2026 from the Settlement Fund is approved,

together with a holdback of \$34,000 for additional notice and administration fees and expenses Epiq anticipates incurring. Additional notice and administration costs incurred thereafter shall remain payable from the Settlement Fund in accordance with the Settlement Agreement and the Preliminary Approval Order.

8. A set aside of \$1,000,000 from the Settlement Fund is approved for future litigation costs and expenses to be incurred as the Action against the Non-Settling Defendants continues. EUP Settlement Class Counsel shall maintain records of all expenditures from the set aside and shall account for the set aside in connection with any future application for reimbursement of expenses or an award of attorneys' fees.
9. The amounts approved herein shall be paid from the Settlement Fund held in escrow at The Huntington National Bank in accordance with the terms of the Settlement Agreement and the Preliminary Approval Order.
10. This Order does not address any application for an award of attorneys' fees or for service awards to the Settlement Class Representatives. Any such application will be made at a later date with appropriate notice to the EUP Settlement Class, as stated in the Court-approved Notice.

11. The Court shall retain continuing and exclusive jurisdiction over matters relating to the implementation of this Order.

BY THE COURT:

WILLIAM J. MARTINI, U.S.D.J.