

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: TIKTOK, INC.,
CONSUMER PRIVACY
LITIGATION,**

MDL No. 2948

Master Docket No. 20-cv-4699

Judge John Z. Lee

Magistrate Judge Sunil R. Harjani

This Document Relates to All Cases

**REPLY IN SUPPORT OF PLAINTIFFS' MOTIONS FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND FOR ATTORNEYS' FEES**

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On March 31, 2022, Plaintiffs filed their Motion for Final Approval of Class Action Settlement, ECF No. 195 (“Final Approval Motion”), and Motion for Attorneys’ Fees, Reimbursement of Expenses, and Class Representative Service Awards, ECF No. 197 (“Fee Motion”) (collectively, the “Motions”). Four objectors filed responses. ECF Nos. 203 (Helfand), 210 (Cochran), 212 (Litteken), 214 (Mark S.). In addition, counsel outside of the court-appointed leadership group (“GPM and Phillips Erlewine”), who are co-counsel for certain class representatives, filed a brief regarding their attorneys’ fees. ECF No. 216. Plaintiffs respectfully submit this response to those briefs.

I. INTRODUCTION

This Settlement garnered favorable support from the Class and from dozens of experienced attorneys and plaintiffs who brought actions that were ultimately consolidated into this MDL. Over 1.2 million Class members submitted claims – comprising at least 1.4% of the Nationwide Class and 13% of the Illinois Subclass. This reaction reflects that the Notice plan was successful, and the Settlement Class views the Settlement favorably.

In contrast to the Class’s widespread support, just four class members submitted objections. As discussed in Plaintiffs’ Final Approval Motion, none warrants upending the Settlement. And that remains true following the objectors’ subsequent submissions, in which they rehash prior objections the Court has already considered and rejected, take issue with claims rates that meet and exceed typical rates for a class of this size, and challenge the allocation of Settlement funds which was fair in both process and result.

The Settlement achieved an excellent result for the Class, it satisfies all criteria for final settlement approval, and Plaintiffs’ Final Approval Motion should be granted.

Following the Class’s positive support for the Settlement, Plaintiffs filed the Fee Motion, seeking attorneys’ fees amounting to one third of the Settlement fund, as supported by a lodestar

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