### 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

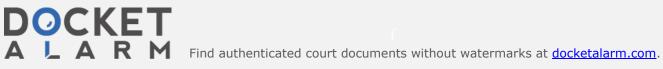
This Document Relates to All Cases

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



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Cases	<b>(s)</b>
Hale v. State Farm Mut. Auto. Ins. Co., 2018 WL 6606079 (S.D. Ill. Dec. 16, 2018)	18
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Other Authorities	
Brian T. Fitzpatrick, A Fiduciary Judge's Guide to Awarding Fees in Class Actions, 89 Fordha L. Rev. 1151, 1155 (2021)	ım 18



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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