

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

22-MD-3050 (KPF)

CHANTIX (VARENICLINE)
MARKETING, SALES PRACTICES AND
PRODUCTS LIABILITY LITIGATION
(NO. II)

22-MC-3050 (KPF)

This Document Relates to All Actions

**NOTICE OF CLASS COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on October 13, 2026 at 3:00 p.m., in Courtroom 40 of the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Class Counsel for (i) Consumer Plaintiffs Juan Abreu, Teresa Baptiste, Timothy Bleeker, Harold Bradley, Sharon Carroll, Karen Duff, Albert Edwards, Tara Evans, Lillian Forrest, Kimberly Hill, Valerie Hogue, Douglas Houghton, James Jacobson, Tammy LaMotte, Kathleen Lima, Debra Seeley, Daniel Spence, Hazel Taylor, Carita Thompson, Daphne Walter, Shannon Webb a/k/a Shannon Alicea (the “Consumer Plaintiffs”); and (ii) Third-Party Payor Plaintiffs County of Monmouth, MSP Recovery Claims Series 44, LLC, MSP Recovery Claims, Series LLC, and Ohio Carpenters’ Health Fund (the “TPP Plaintiffs,” and collectively with the Consumer Plaintiffs, the “Plaintiffs”) will and hereby do move this Court for an Order awarding: (1) attorneys’ fees to Class Counsel in the amount of \$14,666,666.67 (one-third of the \$44,000,000 gross Settlement Fund); (2) reimbursement of \$144,340.20 in litigation expenses; (3) interest earned at the same rate as the Settlement Fund on these awards; and (4) incentive awards for TPP Plaintiffs of \$15,000 and Consumer Plaintiffs of \$5,000 which shall be paid from the Settlement Fund. *See* Settlement Agreement, ECF No. 131-1, §8.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Section 8 of the Parties’ Class Action Settlement Agreement (ECF No. 131-1) and is based on the accompanying Memorandum of Law and authorities cited therein, the Joint Declaration of Joseph P. Guglielmo, David J. Stanoch, and Charles E. Schaffer and the exhibits attached thereto, the Settlement Agreement, and all files, records, and proceedings in this matter.

As of the filing of this motion, there also have been no objections from Settlement Class Members to the proposed attorneys' fees, litigation expenses, or service awards.

Dated: August 28, 2026

Respectfully submitted,

/s/ Joseph P. Guglielmo
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Class Counsel

CERTIFICATE OF SERVICE

On this 28th day of August, 2026, a true and correct copy of the foregoing was filed and served upon all counsel of record via the Court's CM/ECF system.

/s/ Joseph P. Guglielmo
Joseph P. Guglielmo