

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

PRO SLAB, INC., BREMER CONSTRUCTION
MANAGEMENT, INC., and MICHELLE L. VIEIRA,
Chapter 7 Trustee of FORREST CONCRETE, LLC, on
behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

ARGOS USA LLC,
ARGOS READY MIX LLC,
LAFARGE NORTH AMERICA INC.,
COASTAL CONCRETE SOUTHEAST II, LLC,
THOMAS CONCRETE, INC.,
THOMAS CONCRETE OF SOUTH
CAROLINA, INC.,
EVANS CONCRETE, LLC,
ELITE CONCRETE, LLC, SMYRNA READY
MIX CONCRETE, LLC, TROY BAIRD, and TREY
COOK,

Defendants.

Case No. 2:17-cv-03185-BHH

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS
RELATED TO LAFARGE NORTH AMERICA, INC. SETTLEMENT**

Pursuant to Fed. R. Civ. P. 54(d)(2) and 23(h), Plaintiffs move this Court for an order granting their Application for Attorneys' Fees, Reimbursement of Expenses, and Service Award Related to Lafarge Settlement. Class Counsel requests attorneys' fees of \$1,800,000, plus accrued interest thereon, reimbursement of litigation expenses of \$2,600,000, and service awards to the three class representatives of \$15,000 each.

In support of their motion, Plaintiffs file their memorandum of law and Joint Declaration of Interim Lead Counsel contemporaneously herewith.

Dated: August 19, 2025

Respectfully submitted,

/s/Russell T. Burke

Russell T. Burke

Fed. Bar No. 1604

WILLIAMS BURKE LLP

1320 Main Street, Suite 300

Columbia, SC 29201

803-665-9670

Russell@williamsburke.com

Plaintiffs' South Carolina Counsel

Renae D. Steiner

Vincent J. Esades

HEINS MILLS & OLSON, P.L.C.

310 Clifton Avenue

Minneapolis, MN 55403

(612) 338-4605

rsteiner@heinsmills.com

vesades@heinsmills.com

Irwin B. Levin

Richard E. Shevitz

Scott D. Gilchrist

Vess A. Miller

COHEN & MALAD, LLP

One Indiana Square, Suite 1400

Indianapolis, IN 46204

(317) 636-6481

ilevin@cohenandmalad.com

rshevitz@cohenandmalad.com

sgilchrist@cohenandmalad.com

vmiller@cohenandmalad.com

Gregory P. Hansel¹

Michael S. Smith

Elizabeth F. Quinby

Michael D. Hanify

**PRETI FLAHERTY, BELIVEAU & PACHIOS
LLP**

One City Center

P.O. Box 9546

Portland, ME 04112

(207) 791-3000

ghansel@preti.com

msmith@preti.com

equinby@preti.com

mhanify@preti.com

Interim Plaintiffs' Co-Lead Counsel

¹ Special Counsel for Trustee Michelle Vieira of Forrest Concrete, LLC, *In re: Forrest Concrete, LLC, Debtor*, Case No. 23-01171-jd, Chapter 7, U.S. Bankruptcy Court, District of South Carolina.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 19, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will cause a true and correct copy to be served via e-mail on all ECF-registered counsel of record.

/s/Russell T. Burke

Russell T. Burke