

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

IN RE MUTUAL FUNDS)	MDL No. 1586
INVESTMENT LITIGATION)	
)	Case No. 04-MD-15864-02
This Document Relates To:)	(Hon. J. Frederick Motz)
<i>Invesco Sub-Track,</i>)	
04-md-15864-02)	
)	

PLAINTIFFS' COUNSEL'S MOTION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES IN THE INVESCO SUB-TRACK

Court-appointed Investor Class Lead Counsel, Bernstein Litowitz Berger & Grossmann LLP; Court-appointed ERISA Lead Counsel, Harwood Feffer LLP; and Court-appointed Derivative Lead Counsel, Wolf Haldenstein Adler Freeman & Herz LLP (collectively, "Plaintiffs' Counsel") respectfully move this Court, under Rule 23(h) of the Federal Rules of Civil Procedure, for an award of attorneys' fees and reimbursement of litigation expenses from the Gross Settlement Fund established by the Settlements of class and derivative claims pending in the Invesco sub-track of MDL-1586 - *In re Mutual Funds Investment Litigation* (the "MDL").

The grounds for this motion are set forth in the accompanying (i) Plaintiffs' Counsel's Memorandum Of Law In Support Of Motion For Attorneys' Fees And Reimbursement Of Litigation Expenses In The Invesco Sub-Track; (ii) Declaration of Chad Johnson, William C. Fredericks and Jerald Bien-Willner in Support of Final Approval of Proposed Settlements, Plan of Allocation of Settlement Proceeds, and Application for Attorneys' Fees and Reimbursement of Litigation Expenses in the Invesco Sub-Track, and all exhibits thereto; (iii) affidavits of counsel for the ERISA and Derivative Plaintiffs; and (iv) Plaintiffs' Omnibus Memorandum Of Law In Support Of Applications For Attorneys' Fees And Reimbursement Of Expenses; all other papers and proceedings in these Actions; and such oral argument at the Court may permit.

A proposed order will be submitted prior to the Settlement Hearing.

DATED: September 14, 2010

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

/s/ Chad Johnson

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