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# **Attorney Fee Awards, 3d ed.**

**By Alba Conte**

Enclosed is the Spring 2025 Supplement to Attorney Fee Awards, 3d ed. This enclosure is a complete replacement of the Fall 2024 Supplement. Please note that, for ease of handling, the materials in this shipment may ship in more than one box.

## **Shelving Instructions**

- REMOVE and RECYCLE the Fall 2024 Supplement pamphlets.
- PLACE the new Spring 2025 Supplement pamphlets next to each volume.

## **Highlights**

New features and recent developments in this release include:

- Enhanced discussion on cy pres remedies, including *In re Baby Products Antitrust Litigation* (1:1).
- *Berry v. Air Force Central Welfare Fund*, where the Ninth Circuit held that the catalyst theory is unavailable to a party seeking fees under § 928(a) of the Longshore and Harbor Workers' Compensation Act (3:2).
- *Holsum de Puerto Rico, Inc. v. ITW Food Equipment Group LLC*, regarding fee awards as a sanction to remedy and punish improper conduct of adversaries (7:1)
- New discussion and caselaw regarding The National Childhood Vaccine Injury Act (12:11)

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