## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (Southern Division)

SHARNESE HALL On Her Own Behalf and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

Civil Action No. 8:22-cv-00996-BAH

HWS, LLC t/a HENRY'S WRECKER SERVICE, *et al.* 

Defendants.

## Motion for Award of Attorney's Fees and Expenses to Class Counsel

Pursuant to *Fed.R.Civ.P.* 23(h) and 54(d)(2), and ¶ 22 of the Settlement Agreement in this case (ECF No. 106-2), Plaintiff Sharnese Hall ("Representative Plaintiff") respectfully requests approval an award of attorney's fees equal to one-third (33<sup>1</sup>/<sub>3</sub>%) of the \$3 million Common Fund created by the Settlement Agreement, plus reimbursement of Class Counsel's litigation costs in the amount of \$10,494<sup>63</sup>.

This Motion is well within the benchmark applied in similar cases, especially considering the results of this case. Additional grounds and authorities for this Motion are in the accompanying Memorandum of Law, which is incorporated.

WHEREFORE, Representative Plaintiff respectfully requests that the Court approve an award of attorney's fees of one-third (33<sup>1</sup>/<sub>3</sub>%) of the \$3 million Common Fund, plus reimbursement from the Common Fund of Class Counsel's litigation expenses in the amount of \$10,494<sup>63</sup>, and enter the comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.

Respectfully submitted,

/s/ Richard S. Gordon

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