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.

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

v.

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

Defendants.

Motion To Approve Cy Pres Award

Plaintiff Sharnese Hall ("Representative Plaintiff") respectfully moves to award any *cy pres* funds resulting from this case to the University of Maryland Francis King Carey School of Law.

The Settlement Agreement in this case provides that if the Common Settlement Fund is not exhausted after distribution to Settlement Class members (for example, if settlement checks mailed to some Settlement Class members are not negotiated), then those remaining funds will be donated, with the approval of the Court, to the University of Maryland Francis King Carey School of Law for the endowment of the Michael Millemann Professorship in Consumer Protection Law. See ECF No. 106-2, Settlement Agreement ¶ 20. Given the nature of the settlement here, and the general purpose of the equitable cy pres remedy -i.e., to benefit members of a class and the public indirectly when provision of a direct benefit is impossible or difficult to attain - the University of Maryland Francis King Carey School of Law is an appropriate cy pres recipient.

Further grounds and authorities for this Motion are in the accompanying memorandum of law, which is incorporated.

WHEREFORE, Representative Plaintiff respectfully requests that this Court approve the creation of a *cy pres* fund, as well as the proposed *cy pres* recipient, the

University of Maryland Francis King Carey School of Law, in accordance with ¶ 20 of the Settlement Agreement, and enter the comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.

Respectfully submitted,

/s/ Richard S. Gordon

Richard S. Gordon (Fed. Bar No. 06882)
Benjamin H. Carney (Fed. Bar No. 27984)
GORDON, WOLF & CARNEY, CHTD.
11350 McCormick Rd.
Executive Plaza 1, Suite 1000
Hunt Valley, Maryland 21031
Tel. (410) 825-2300
Fax. (410) 825-0066
rgordon@GWCfirm.com
bcarney@GWCfirm.com

Attorneys for Representative Plaintiff and the Settlement Class