

**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.

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

Defendants.

.....

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

Motion for Approval of Incentive Award to the Representative Plaintiff

Pursuant to ¶¶ 21 & 36(b) of the Settlement Agreement in this case (ECF No. 106-2), Plaintiff Sharnese Hall (“Representative Plaintiff”) respectfully requests that this Court approve an incentive award to her of \$15,000 – an award which Defendants HWS, LLC, Henry’s Wrecker Service Company of Fairfax County, Inc., Fred Scheler, Richard Barakat, and Joshua Welk have agreed to pay separate and apart from the Common Fund in this case, and which will not diminish or affect the relief to other Settlement Class Members. The requested award is warranted because Representative Plaintiff secured the proposed Settlement in this case not only on behalf of herself, but in favor of thousands of other similarly situated consumers. This type of award is both permissible and desirable where, as here, a class action has achieved a significant benefit for a large number of people as the result of a lawsuit filed on their behalf by a class representative.

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

WHEREFORE, Representative Plaintiff respectfully requests that this Court approve an incentive payment to her of \$15,000, and enter the comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.

Respectfully submitted,

/s/ Richard S. Gordon

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