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| DOCKET NO. X03 HHD-CV14-6055537-S | : | SUPERIOR COURT |
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| HOLLY CHANDLER AND DEVON ANN CONOVER, | : | COMPLEX LITIGATION DOCKET |
| | : | |
| PLAINTIFFS, | : | AT HARTFORD |
| | : | |
| VS. | : | |
| | : | |
| DISCOUNT POWER, INC. | : | |
| | : | |
| DEFENDANT | : | FEBRUARY 1, 2017 |

**PLAINTIFFS’ MOTION FOR AN AWARD OF ATTORNEYS FEES,
REIMBURSEMENT OF EXPENSES, AND
CASE CONTRIBUTION AWARDS**

Plaintiffs Holly Chandler and Devon Ann Conover (“Plaintiffs”), individually and on behalf of the proposed Settlement Class,¹ respectfully moves that the Court:

- (a) Award attorneys’ fees to Settlement Class Counsel in the amount of 25 percent of the Settlement, or \$212,500;
- (b) Award Settlement Class Counsel the amount of \$100,550.41 for expenses reasonably and necessarily incurred in the prosecution of the litigation;
- (c) Award Lead Plaintiffs Holly Chandler and Devon Ann Conover \$2,000 each for their time and effort on behalf of the Settlement Class.

In support of this Motion, Plaintiff states: (1) the requested fees are supported by Settlement Class Counsel’s substantial commitment of time and effort to this litigation over a two-year period, as well as other factors considered by Courts in determining an award of fees in

¹ All capitalized terms have the meaning set out in the Settlement Agreement, attached to the Affidavit of Seth R. Klein in Support of Plaintiffs’ Motion for Certification of Settlement Class and Final Approval of Class Action Settlement and Motion for Award of Attorneys’ Fees & Expenses and for Case Contribution Awards (“Klein Aff.”), as Exhibit A.

complex class actions which result in the creation of a common fund; (2) the expenses were reasonably and necessarily spent in furtherance of the litigation (indeed, virtually all of the costs involved experts whose assistance was essential to the case); and (3) Lead Plaintiffs devoted substantial time and effort to prosecuting the case on behalf of the Settlement Class. In further support of this Motion, Plaintiffs have filed a Memorandum of Law, supporting affidavits from Seth R. Klein, Holly Chandler, Devon Ann Conover, and Senior Project Manager Scott DiCarlo (on behalf of Notice and Claims Administrator KCC Class Action Services, LLC), together with a Proposed Order.

Dated: February 1, 2017

PLAINTIFFS,
HOLLY CHANDLER AND
DEVON ANN CONOVER

By: /s/ Seth R. Klein
Robert A. IZARD
Seth R. Klein
IZARD KINDALL & RAABE LLP
(Juris No. 410725)
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(860) 493-6292

CERTIFICATION

Pursuant to Practice Book § 10-14, I hereby certify that a copy of the above was mailed or electronically delivered on February 1, 2017 to all counsel and pro se parties of record.

James T. Shearin
David P. Atkins
Pullman & Comley, LLC
850 Main Street, P.O. Box 7006
Bridgeport, CT 06601-7006

/s/ Seth R. Klein
Seth R. Klein