

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

SHAKEERA MYERS, on behalf of)
herself and all others similarly situated,)

Plaintiff,)

v.)

LOOMIS ARMORED US, LLC,)

Defendant.)

CA No. 3:18-cv-00532-FDW-DSC

**PLAINTIFF’S UNOPPOSED MOTION FOR APPROVAL OF
ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES**

For the reasons set forth in the accompanying memorandum of law, the Declaration of Gilda Adriana Hernandez in Support of Plaintiff’s Unopposed Motions for Preliminary Approval of Class and Collective Action Settlement; Approval of Settlement Administrator; Approval of Plaintiff’s Notice of Settlement; Approval of Attorneys’ Fees and Reimbursement of Expenses, and Approval of Service Awards (“Hernandez Decl.”), and consistent with the terms of the Parties’ Stipulation and Settlement Agreement, Plaintiff respectfully requests that the Court enter an Order:

- (1) Awarding Class Counsel attorneys’ fees of one-third (\$500,000.00) of the Gross Settlement Fund, should the Court grant final approval to the Parties’ proposed settlement;
- (2) Awarding Class Counsel \$35,000.00 of the Gross Settlement Fund for

litigation expenses, should the Court grant final approval to the Parties' proposed settlement; and

(3) Granting such other relief as the Court deems just and proper.

Counsel for Plaintiff has conferred with Counsel for Defendants, and, consistent with the terms of the Parties' Stipulation and Settlement Agreement, which has been presented to the Court for preliminary approval, Defendant does not oppose the instant motion.

Respectfully submitted on November 4, 2019.

BY: /s/ Gilda Adriana Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2019, I electronically filed the foregoing true and accurate copy of **PLAINTIFF’S UNOPPOSED MOTION FOR APPROVAL OF ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES** with the Court using the CM/ECF system, and I hereby certify that I have thereby electronically served the document to the following:

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)
Plaintiff,)

v.)

CA No. 3:18-cv-00532-FDW-DSC

LOOMIS ARMORED US, LLC,)
)
Defendant.)

**[PROPOSED] ORDER GRANTING PLAINTIFF’S UNOPPOSED
MOTION FOR APPROVAL OF ATTORNEYS’ FEES AND
REIMBURSEMENT OF EXPENSES**

The above captioned matter came before the Court on Plaintiff’s Unopposed Motion for Preliminary Approval of Attorneys’ Fees and Reimbursement of Costs and Expenses (“Unopposed Motion for Attorneys’ Fees”) (Dkt. No. 64). The Court has considered the representations of Plaintiff’s Counsel, the pleadings, and the record, and rules as follow with respect to Plaintiff’s Counsel’s request for attorneys’ fees and reimbursement of litigation costs and expenses:

- (1) Plaintiff’s Counsel are awarded attorneys’ fees in the amount equal to one-third of the Maximum Gross Settlement Amount (i.e., \$500,000.00); and

(2) Plaintiff's Counsel are awarded litigation costs and expenses in the amount of **\$35,000.00**, to come from the Gross Settlement Amount.

DATED: _____

By the Court:

THE HONORABLE FRANK D. WHITNEY
CHIEF UNITED STATES DISTRICT JUDGE