

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TERESA STRINGER, KAREN BROOKS,
WILLIAM PAPANIA, JAYNE NEWTON,
MENACHEM LANDA, ANDREA
ELIASON, BRANDON LANE, DEBBIE
O’CONNOR, MICHELLE WILLIAMS and
WAYNE BALNICKI, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

NISSAN OF NORTH AMERICA, INC. and
NISSAN MOTOR CO., LTD.

Defendants.

Case No. 3:21-cv-00099

CLASS ACTION

Judge William L. Campbell
Courtroom A826
Magistrate Judge Barbara D. Holmes
Courtroom 764

JURY TRIAL DEMANDED

**PLAINTIFFS’ MOTION FOR MOTION FOR ATTORNEY FEES, PAYMENT OF
EXPENSES, AND FOR SERVICE AWARDS**

Plaintiffs, individually and on behalf of the preliminarily approved Settlement Class, hereby submit this Motion for Attorney Fees, Payment of Expenses, and for Service Awards to Representative Plaintiffs. Plaintiffs request an order (1) awarding attorney’s fees in the amount of \$6.25 million, (2) awarding payment of litigation expenses of \$83,816.19, and (3) awarding \$5,000 to each Representative Plaintiff for a total of \$50,000.

On October 13, 2021, the Court entered its Order Granting Preliminary Approval of Class Action Settlement, Certifying the Settlement Class, and approving the form and content of the Notice. (Dkt. No. #75) (“Preliminary Approval Order”). As explained in greater detail in the accompanying Memorandum in Support, all requirements set forth by the Court in its Preliminary Approval Order have been satisfied. In support of this Motion, the Plaintiffs rely upon the following:

1. Memorandum of Law in support hereof filed contemporaneously herewith;
2. Declaration of J. Gerard Stranch, IV in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement Agreement and Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Class Representative Service Awards, filed contemporaneously herewith;
3. Declarations of Lee Bowron, Brian Fitzpatrick, and Lana Lucchesi in support hereof filed contemporaneously herewith.
3. Declaration of Brian T. Fitzpatrick in support hereof filed contemporaneously herewith.
5. All documents submitted in support of the previously filed Motion for Preliminary Approval (D.E. # 75); and
6. All documents submitted in support of the Motion for Final Approval filed contemporaneously herewith.

Accordingly, Plaintiffs respectfully request an order: (1) awarding attorney's fees in the amount of \$6.25 million, (2) awarding payment of litigation expenses of \$83,816.19, (3) awarding \$5,000 to each Representative Plaintiff for a total of \$50,000.

The proposed order attached as an Exhibit to the Motion for Final Approval addresses the award and fees and expenses as requested in this Motion. As a result, no proposed order is attached hereto.

Respectfully submitted,

Dated: February 7, 2022

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CERTIFICATE OF SERVICE

The undersigned certifies the foregoing document was filed with the Court's Case Management/Electronic Case Filing System, this 7th day of February, 2022, and served upon the following counsel:

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