

FILED
08-22-2023
Anna Maria Hodges
Clerk of Circuit Court
2023CV001935

STATE OF WISCONSIN CIRCUIT COURT MILWAUKEE COUNTY

KEEFE JOHN and JILLIAN CATHERINE
KLUG, *individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

Case No.: 23-CV-1935

FROEDTERT HEALTH, INC.,

Defendant.

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, EXPENSES AND
SERVICE AWARDS FOR CLASS REPRESENTATIVE**

Pursuant to this Court's June 2, 2023 Order granting preliminary approval of the class action Settlement, Plaintiffs Keefe John and Catherine Jillian Klug (collectively, "Plaintiffs" or "Class Representatives"), individually and on behalf of all others similarly situated, hereby move this Court to approve an award of attorneys' fees in the amount of \$700,000. This requested amount represents approximately 35% of the Net Settlement Fund.¹ Plaintiffs also respectfully move this Court for an award of reasonable and necessary litigation costs and expenses in the amount of \$20,302.78 and for reasonable Service Awards for Class Representatives in the amount of \$3,500 each (for a total of \$7,000).

In support of this Motion, Plaintiffs state and present the following:

1. The terms of the Settlement are set forth in the Settlement Agreement,
2. The relief sought in this Motion is supported by: (a) Plaintiffs' Memorandum of Law (the "Memorandum") in Support of Plaintiffs' Motion for Attorneys' Fees, Costs, Expenses,

¹ Unless otherwise indicated, the defined terms herein shall have the same definition and meaning as set forth in the Class Settlement Agreement and Release ("Settlement Agreement"), which was filed with this Court on May 5, 2023.

and Service Awards for Class Representatives (“Motion for Attorneys’ Fees”), to be filed contemporaneously herewith; (b) the Affidavit of Gary M. Klinger in Support of the Motion for Attorneys’ Fees, attached as **Exhibit 1** to the Memorandum; and (c) the Affidavit of David S. Almeida in Support of Plaintiffs’ Motion for Attorneys’ Fees, attached as **Exhibit 2** to the Memorandum.

3. Plaintiffs will submit a [Proposed] Order and Judgment Granting Final Approval of Class Action Settlement (“[Proposed] Final Order and Judgment”), covering the requested fees, costs, expenses, and Service Awards, with Plaintiffs’ Motion for Final Approval of Class Action Settlement (“Motion for Final Approval”) on or before February 8, 2023.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court enter the [Proposed] Final Order and Judgment filed with Plaintiffs’ Motion for Final Approval, approving Plaintiffs’ requested fees in the amount of \$700,000, litigation costs and expenses in the amount of \$20,302.78, and Service Awards in the amount of \$3,500 per Class Representative (for a total of \$7,000).

Dated: August 22, 2023

Respectfully submitted,

HANSEN REYNOLDS LLC

Electronically signed by Timothy M. Hansen

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Attorneys for Settling Plaintiffs & the Class