

CONSTANCE JURICH, on behalf of  
herself and all others similarly situated,

Plaintiffs,

v.

VERDE ENERGY USA, INC.,

Defendant.

SUPERIOR COURT

COMPLEX LITIGATION DOCKET  
AT HARTFORD

January 3, 2020

**PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS FEES AND EXPENSES  
AND FOR CASE CONTRIBUTION AWARD**

Plaintiff Constance Jurich (“Plaintiff”), individually and on behalf of the proposed Settlement Class,<sup>1</sup> respectfully moves that the Court:

- (a) Award attorneys’ fees and expenses to Settlement Class Counsel in the combined amount of \$1,500,000 (\$1,387,079.26 in fees and \$112,920.74 in expenses), or 25% of the direct cash available to the Class; and
- (b) Award Lead Plaintiff Constance Jurich a case contribution award of \$5,000 for her 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 during a period that spanned over four years, as well as other factors considered by courts in determining an award of fees in complex class actions; (2) the expenses were reasonably and necessarily spent in furtherance of the litigation; and (3) Plaintiff devoted substantial time and effort to prosecuting the case on behalf of the Settlement Class.

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<sup>1</sup> All capitalized terms have the meaning set out in the Settlement Agreement.

In further support of this Motion, Plaintiff has filed:

- a Memorandum of Law specific to this Motion;
- supporting affidavits from (i) Seth R. Klein of IZARD KINDALL & RAABE LLP and (ii) Scott Fenwick, Chief of Operations at Heffler Claims Group, both of which also serve to support Plaintiff's separate Motion for Modification of the Certified Class Definition and Approval of Class Action Settlement ("Final Approval Motion"), filed simultaneously herewith; and
- a combined Proposed Order, which also serves as a Proposed Order for the Final Approval Motion.

Dated: January 3, 2020

THE PLAINTIFF

BY /s/ Seth R. Klein  
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Mark P. Kindall  
Seth R. Klein  
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**CERTIFICATION**

I certify that on this 3<sup>rd</sup> day of January, 2020, a copy of the foregoing was sent by email to all counsel of record as follows:

Kevin P. Allen	<u><a href="mailto:kpallen@eckertseamans.com">kpallen@eckertseamans.com</a></u>
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/s/ Seth R. Klein  
Seth R. Klein