

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

GLEN GRAYSON, DOREEN MAZZANTI,
DANIEL LEVY, DAVID MEQUET and
LAUREN HARRIS, individually and on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY,

Defendant.

No. 3:13-cv-01799-WWE

(Consolidated Docket No.)

APRIL 30, 2020

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES
AND FOR LEAD PLAINTIFF SERVICE AWARDS**

Plaintiffs Glen Grayson, Doreen Mazzanti, Daniel Levy, David Mequet, and Lauren Harris (collectively, "Plaintiffs"), individually and on behalf of the Settlement Class (as defined in the Settlement Agreement),¹ respectfully move that the Court, in accord with ¶ 46 of the Settlement Agreement:

- (a) award \$927,066.13 for attorneys' fees and \$397,933.87 for reimbursement of Class Counsel's litigation expenses; and

¹ Capitalized terms used herein are defined in the Settlement Agreement [ECF No. 358-1]. For the Court's convenience, another copy of the Settlement Agreement is attached as Exhibit A to the Declaration of Seth R. Klein in Support of Final Approval of Class Action Settlement, submitted herewith.

(b) award a \$5000 Service Award to each Lead Plaintiff (for a total of \$25,000 to the five Plaintiffs), in recognition for their service to the Class.

In support of this Motion, Plaintiffs state: (1) the requested fees, constituting just 25% of Class Counsel's lodestar, are supported by Class Counsel's substantial commitment of time and effort to this litigation during a period that spanned over six 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) 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, the Declaration of Seth R. Klein of IZARD KINDALL & RAABE LLP, the Declaration of Hassan Zavareei of Tycko & Zavareei LLP, and the Declaration of Cameron R. Azari of Epiq Class Actions & Claims Solutions, Inc. Plaintiffs will submit a [Proposed] Order and Final Judgment for the Court's consideration no later than June 29, 2020 (the date set by the Court for Plaintiff to respond to any objections), in anticipation of the Final Approval Hearing scheduled for July 16, 2020.²

Dated: April 30, 2020

Respectfully submitted,

PLAINTIFFS

By: /s/ Seth R. Klein
Robert A. IZARD (ct01601)
Seth R. Klein (ct18121)
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² As set forth in Plaintiffs' accompanying memorandum of law, to the extent that COVID-19 prevents an in-person hearing on the scheduled date, Plaintiffs respectfully request that, pursuant to ¶ 2 of the "Superseding General Order Re: Court Operations" issued in this District on April 27, 2020, the hearing be held by telephone or videoconference.

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