

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

REGINALD REDDICK, ANGELA	§	
REDDICK, JOSE PALACIOS, NERI	§	
URBINA, LEONILA URBINA, PHILLIP	§	
LEE, and PATTI LEE on behalf of	§	
themselves and all others similarly situated,	§	
	§	
Plaintiffs,	§	Civil Action No. 3:19-CV-02193-N
v.	§	
	§	
FREEDOM MORTGAGE CORPORATION,	§	
	§	
	§	
Defendant.	§	

**PLAINTIFFS’ MOTION FOR AWARD OF ATTORNEYS’ FEES, LITIGATION COSTS,
AND SERVICE AWARDS**

In accord with the Settlement Agreement and Release (ECF No. 107-2) (the “Settlement Agreement”) and this Court’s Preliminary Approval Order (ECF No. 109) (the “Preliminary Approval Order”), Plaintiffs Reginald Reddick, Angela Reddick, Jose Palacios, Neri Urbina, Leonila Urbina, Phillip Lee and Patti Lee, (“Plaintiffs” or “Settlement Class Representatives”) and Plaintiffs’ Counsel respectfully move this Court for an award of attorneys’ fees of one-third of the Gross Settlement Fund created by the settlement of the above-captioned action (the “Settlement”), or \$749,925; reimbursement of litigation expenses in the amount of \$19,982; and service awards in the amount of \$5,000 to each of the Class Representatives.

In the Court’s Preliminary Approval Order, this Court preliminarily approved the proposed Settlement, conditionally certified the Settlement Class, and directed that the notice be sent to Settlement Class Members informing them of the terms of the Settlement and their rights with respect thereto. As set forth in the Declaration of James Prutsman Regarding Notice Procedures, which is being filed concurrently herewith, the notice program approved by the

Court has been completed, which included notice to Settlement Class Members that Plaintiffs' Counsel would be seeking an award of attorneys' fees of one-third of the Settlement, reimbursement of litigation expenses, as well as service awards to the Settlement Class Representatives of \$5,000 each.

A proposed order addressing the attorneys' fees, costs, and service awards was filed with the Motion for Preliminary Approval, ECF No. 106.

Dated: October 26, 2021

Respectfully submitted,

/s/ Elizabeth Ryan

Elizabeth Ryan

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Counsel for Plaintiffs and the Settlement Class

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiffs and Defendant have conferred and as of this date, Defendant has not indicated whether it opposes this motion.

/s/ Elizabeth Ryan
Elizabeth Ryan

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2021, I electronically filed the foregoing document using the CM/ECF system, which will send notification of such filing to all current counsel of record.

/s/ Elizabeth Ryan
Elizabeth Ryan