

DOCKET NO. X03 HHD-CV-17-6075408-S

LYDIA GRUBER,	:	SUPERIOR COURT
on behalf of herself and all others	:	
similarly situated,	:	JUDICIAL DISTRICT OF HARTFORD
<i>Plaintiff,</i>	:	COMPLEX LITIGATION DOCKET
	:	
v.	:	
	:	
STARION ENERGY, INC.	:	
<i>Defendant.</i>	:	July 24, 2017

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

Plaintiff Lydia Gruber (“Plaintiff”), individually and on behalf of the proposed Settlement Class,¹ respectfully moves that the Court:

- (a) Award attorneys’ fees to Settlement Class Counsel in the amount of 32 percent of the Settlement, or \$825,600.00;
- (b) Award Settlement Class Counsel the amount of \$190,719.00 for expenses reasonably and necessarily incurred in the prosecution of the litigation;
- (c) Award Lead Plaintiff Lydia Gruber and her fellow Class Representatives Louise Ferdinand, Melissa Pennellatore, Diana Windley, Case Martin, and Douglas Siedenbug \$2,000 each for their 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 two years, as well as other factors considered by courts in determining

¹ All capitalized terms have the meaning set out in the Settlement Agreement, attached to the Affidavit of Seth R. Klein in Support of Plaintiffs’ Motion for Certification of Settlement Class and Final Approval of Class Action Settlement and Motion for Award of Attorneys’ Fees & Expenses and for Case Contribution Awards (“Klein Aff.”), as Exhibit A.

an award of fees in complex class actions which result in the creation of a common fund; (2) the expenses were reasonably and necessarily spent in furtherance of the litigation (indeed, virtually all of the costs involved experts whose assistance was essential to the case); and (3) Plaintiff and Class Representatives 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, supporting affidavits from Seth R. Klein of IZARD KINDALL & RAABE LLP (including individual affidavits from Lydia Gruber, Louise Ferdinand, and Melissa Pennellatore); Jeremy Heisler of SANFORD HEISLER SHARP LLP (including individual affidavits from Diana Windley, Case Martin, and Douglas Seidenburg); and Senior Project Manager Scott DiCarlo (on behalf of Notice and Claims Administrator KCC Class Action Services, LLC); together with a Proposed Order.

Dated: July 24, 2017

PLAINTIFF,

LYDIA GRUBER

By: /s/ Seth R. Klein
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Counsel for Plaintiff, Class Representatives
and the Class*

CERTIFICATION

Pursuant to Practice Book § 10-14, I hereby certify that a copy of the above was mailed or electronically delivered on July 24, 2017 to all counsel and pro se parties of record.

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/s/ Seth R. Klein _____
Seth R. Klein