

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BARBARA CRAW, <i>et al.</i> ,	X	
	X	
Plaintiffs,	X	CASE NO: 18-CV-12149-LTS
	X	
vs.	X	
	X	
HOMETOWN AMERICA, LLC, <i>et al.</i> ,	X	
	X	
Defendants.	X	
	X	

**PLAINTIFF BARBARA CRAW’S
MOTION FOR APPROVAL OF ATTORNEY’S FEES AND EXPENSES
AND CLASS REPRESENTATIVE AWARD**

Pursuant to Fed. R. Civ. P. 23(h) and Fed. R. Civ. P. 54(d), Plaintiff Barbara Crow moves the Court to approve the Attorney’s Fees and Expenses of \$162,500, as well as the Class Representative Award of \$17,500, proposed in the parties’ Stipulation of Settlement, Doc. No. 171-1, which the Court preliminarily approved on May 7, 2021, Doc. No. 174, and which is the subject of the Fairness Hearing presently scheduled for September 14, 2021. Ms. Crow submits that the \$162,500 award of Attorney’s Fees and Expenses, which Defendants will pay in addition to the proposed \$500,000 Settlement Fund, is reasonable in light of the number of hours spent by Crow’s counsel pursuing the claims of the Settlement Class, the skill with which Crow’s counsel handled this litigation and the substantial benefits obtained for Class members in the proposed Settlement. Ms. Crow further submits that the \$17,500 Class Representative Award, which Defendants will pay in addition to the proposed \$500,000 Settlement Fund, is reasonable in light of the significant efforts undertaken by Crow on behalf of the Settlement Class throughout this litigation. Based on the foregoing, as well as Memorandum of Law and Supplemental Declaration of Ethan R. Horowitz filed herewith, Ms. Crow respectfully requests that the Court

grant this Motion, approve the proposed Attorney's Fees and Expenses of \$162,500 as well as the Class Representative Award of \$17,500 and incorporate such approval into the Final Order and Judgment resolving this litigation.

Respectfully submitted,

BARBARA CRAW,
By her attorney,

This 25th day of August, 2021

/s/ Ethan Horowitz

Ethan R. Horowitz
BBO # 674669
Northeast Justice Center
50 Island Street, Suite 203B
Lawrence MA 01840
(978) 888-0624
ehorowitz@njc-ma.org

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2021, the foregoing Motion and the supplemental declaration referenced therein were electronically filed with the Clerk of the Court through the CM/ECF system, which will send notification of such filing to registered participants, including counsel for the Defendants.

/s/ Ethan Horowitz

Dated: August 25, 2021

Ethan R. Horowitz
BBO # 674669

CERTIFICATE OF LOCAL RULE 7.1(A) COMPLIANCE

I hereby certify that the parties to the above-captioned litigation, through counsel, conferred in good faith concerning the relief sought in the instant Motion and Defendants have assented to the relief sought in the Motion.

/s/ Ethan Horowitz

Dated: August 25, 2021

Ethan R. Horowitz
BBO # 674669