

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MATT DIFRANCESCO, ANGELA MIZZONI, and LYNN
MARRAPODI, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UTZ QUALITY FOODS, INC.,

Defendant.

Civil Action No. 1:14-CV-14744-DPW

PLAINTIFFS' ASSENTED TO MOTION FOR
AWARD OF ATTORNEY FEES, REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARDS

Plaintiffs Matt DiFrancesco, Angela Mizzoni, and Lynn Marrapodi (“Plaintiffs”), on behalf of the proposed Settlement Class and through their undersigned attorneys, hereby move this Court, pursuant to Fed. R. Civ. P. 23(h), for an award of attorney fees and reimbursement of expenses to Plaintiffs’ counsel, and for payment of service awards to the Plaintiffs. Plaintiffs move for attorney fees in the amount of \$375,000, and for reimbursement of expenses in the amount of \$9,953.36. Plaintiffs also move for a service award of \$2,500 to each of the three named Plaintiffs.

As more specifically set forth in the accompanying Memorandum of Law in Support of Motion for Award of Attorney Fees, Reimbursement of Expenses, and Service Awards, and in the accompanying Declaration of Tina Wolfson, Plaintiffs’ request for an award of attorney fees and reimbursement of expenses and payment of service awards meet all of the applicable standards for such awards considered by the First Circuit Court of Appeals and this Court.

In accordance with the Order Authorizing Notice of Class Action Settlement and Notice of Final Fairness Hearing (Dkt. 103), this Motion shall be heard at a fairness hearing before this Court on September 13, 2019, at 3:00 p.m., in Courtroom 1 on the 3rd Floor of the United States District Court for the District of Massachusetts, 1 Courthouse Way, Boston, MA 02210.

WHEREFORE, Plaintiffs respectfully request that the Court grant their request for attorney fees, reimbursement of expenses, and service awards as set forth herein.

Dated: May 31, 2019

AHDOOT & WOLFSON, PC

By: /s/ Tina Wolfson
Tina Wolfson (*pro hac vice*)
twolfson@ahdootwolfson.com
Robert Ahdoot (*pro hac vice*)
rahdoot@ahdootwolfson.com
10728 Lindbrook Dr.
Los Angeles, CA 90024
Phone: (310) 474-9111
Fax: (310) 474-8585

MIRABELLA LAW
Erica C. Mirabella (MA Bar No. 676750)
erica@mirabellaLLC.com
132 Boylston Street, 5th Floor
Boston, MA 02116
Phone: (617) 580-8270
Fax: (617) 583-1905

BARBAT MANSOUR & SUCIU PLLC
Nick Suciu III (*pro hac vice*)
nicksuciu@bmslawyers.com
434 West Alexandrine #101
Detroit, MI 48201
Phone: (313) 303-3471

*Counsel for Plaintiffs and
Proposed Settlement Class Counsel*

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

The undersigned counsel certify that they have conferred with counsel for Defendant regarding the subject matter of this Motion and have attempted in good faith to narrow the issues set forth herein, the result of which is that Defendant assents to this Motion.

/s/ Tina Wolfson
Tina Wolfson

CERTIFICATE OF SERVICE

I hereby certify I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 31, 2019.

/s/ Tina Wolfson
Tina Wolfson