

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

JOSHUA LEWIS, JAMES CAVANAUGH,  
and NATHANIEL TIMMONS, individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

LYTX, INC.,

Defendant.

No. 3:22-cv-00046-NJR  
Hon. Chief Judge Nancy J. Rosenstengel

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,  
LITIGATION EXPENSES, AND SERVICE AWARDS**

In accord with the Class Action Settlement Agreement (ECF No. 125) (the "Settlement Agreement") and this Court's Preliminary Approval Order (ECF No. 126) (the "Preliminary Approval Order"), Class Counsel respectfully move this Court for an award of attorneys' fees of one-third of the Settlement Fund created by the settlement of the above-captioned action (the "Settlement"), or \$1,416,666.67. Class Counsel further seek an award of reimbursement of their out-of-pocket litigation expenses in the amount of \$63,495.79. In addition, Class Counsel request that this Court award each Plaintiff ("Plaintiffs" or "Settlement Class Representatives") a service award in the amount of \$10,000.

By the Court's Preliminary Approval Order, this Court preliminarily approved the Settlement between Plaintiffs and Defendant Lytx, Inc., 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 Joint Declaration of Randall K. Pulliam, Sean A. Petterson, and David Fish in Support of Plaintiffs' Motion for

Attorneys' Fees, Litigation Expenses, and Service Awards ("Joint Decl."), being filed concurrently herewith, Class Counsel have complied with the Court's directive and notice has been given to Settlement Class Members, including notice that Class Counsel would be seeking an award of attorneys' fees of one-third of the Settlement, reimbursement of litigation expenses not to exceed \$125,000, and service awards to each Settlement Class Representative in the amount of \$10,000, and, to date, not one Settlement Class Member has objected. *See* Joint Decl. at ¶ 21.

Being filed contemporaneously herewith are Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Attorneys' Fees, Litigation Expenses, and Service Awards, and the aforementioned declaration. For the reasons set forth therein, Class Counsel respectfully request that this Court (1) award attorneys' fees of \$1,416,666.67, (2) award reimbursement of litigation expenses in the amount of \$63,495.79, and (3) award service awards to each of the Settlement Class Representative in the amount of \$10,000.

Dated: April 18, 2025

Respectfully submitted,

/s/ Randall K. Pulliam

Randall K. Pulliam

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