

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Case No. 0:19-cv-01640-JNE-HB

Village Bank, on behalf of itself and
all others similarly situated,

Plaintiff,

v.

Caribou Coffee Company, Inc.,
Bruegger's Enterprises, Inc., Einstein
& Noah Corp., and Einstein Noah
Restaurant Group, Inc.

Defendants.

**PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND SERVICE AWARD**

Plaintiff, by and through Settlement Class Counsel, respectfully moves this Court for an Order (1) awarding attorneys' fees and reimbursement of expenses in the aggregate amount of \$1,463,515.88; and (2) approving a payment of \$15,000 as a service award to Village bank, as Settlement Class Representative.

The Court's Order from July 24, 2020 (Dkt. No. 51) granted, among other things, preliminary approval of the settlement, conditionally certified a Settlement Class, appointed a Settlement Class Representative and Settlement Class Counsel, approved Notice to the Settlement Class, and ordered Notice be disseminated according to the proposed Notice Plan. The Notice informed Settlement Class Members that Settlement Class Counsel would seek a Class Representative service award of \$15,000 and an award of "reasonable attorneys' fees in the amount of 25% of the Settlement Fund, plus costs and expenses." (Dkt. No. 48-4 ¶ 17)

This motion is based upon the Declaration of Bryan L. Bleichner in Support of Plaintiff's Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Award, the Memorandum in support of the Motion, and upon all files, records, and proceedings in this matter.

Dated: October 1, 2020

CHESTNUT CAMBRONNE PA

By /s/ Bryan L. Bleichner

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