## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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LESLIE URLAUB, MARK PELLEGRINI, and MARK FERRY, on behalf of themselves and all others similarly situated,

Plaintiffs,

Case No. 1:21-cv-04133

Honorable Matthew F. Kennelly

v.

CITGO PETROLEUM CORPORATION, et al.,

Defendants.

## PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, LITIGATION AND SETTLEMENT ADMINISTRATION EXPENSES, AND SERVICE AWARDS

Plaintiffs Leslie Urlaub, Mark Pellegrini, and Mark Ferry ("Plaintiffs") and their counsel ("Class Counsel") hereby move this Court for an Order approving a combined total of \$4,750,000 in attorneys' fees, litigation and settlement administration expenses, and class representative service awards, to be paid by CITGO Petroleum Corporation ("CITGO") out of funds deposited in escrow pursuant to Section IV of the parties' Class Action Settlement Agreement, broken down as follows:

- \$4,675,000 to Class Counsel for attorneys' fees (\$4,366,908.05), litigation expenses (\$304,291.95) and settlement administration expenses (\$3,800); and
- \$75,000 to the named Plaintiffs (\$25,000 each) as Class Representative Service Awards.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Section IV of the Parties' Settlement Agreement (ECF 158-3), and is based on the accompanying Memorandum of Law and authorities cited therein, the declarations of Michelle C. Yau, Peter Stris, and Nina Wasow, and all files, records, and proceedings in this matter.

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Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion

and have been advised that Defendants do not oppose the relief requested. As of the date of this

motion, there have been no objections to the Settlement Agreement or to the proposed awards.

Dated: December 16, 2024

Respectfully submitted,

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