

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS**

Candice Adams
e-filed in the 18th Judicial Circuit Court
DuPage County
ENVELOPE: 18810095
2022LA000308
FILEDATE: 7/25/2022 3:52 PM
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KB

ALEXANDER CLARKE, MILTON
CITCHENS, ANDREW GARCIA, EBONY
JONES, KYLE SWERDLOW, MARLA
WALKER, and RYAN WEBB, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

LEMONADE, INC., LEMONADE
INSURANCE COMPANY, LEMONADE
INSURANCE AGENCY, LLC,
LEMONDADE, LTD., AND LEMONADE
LIFE INSURANCE AGENCY, LLC

Defendants.

Civil Action No. 2022LA000308

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR
ATTORNEYS' FEES, COSTS, EXPENSES, AND SERVICE AWARDS**

PLEASE TAKE NOTICE that on August 25, 2022 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Neal W. Cerne, or anyone sitting in his stead, in Courtroom 2016, via Zoom¹ and shall then and there present Plaintiffs' Unopposed Motion for Attorneys' Fees, Costs, Expenses, and Service Awards, a copy of which is attached hereto and hereby served upon you, to move the Court to:

- a. Approve service awards to Plaintiffs of \$2,500 each; and
- b. Approve an award of attorneys' fees, costs, and expenses of one-third of the Settlement Fund, plus the value of injunctive relief in the amount of \$2,500,000 to Class Counsel.

¹ Click this link to join via Zoom. <https://18thjudicial.org/18thJudicial/Remote-Court-Hearings>

Plaintiffs' Motion is based on: this Notice, Plaintiffs' Unopposed Motion for Attorneys' Fees, Costs, Expenses, and Service Awards; the Settlement Agreement; the Declarations of Alexander Clarke, Milton Citchens, Andrew Garcia, Ebony Jones, Kyle Swerdlow, Marla Walker, and Ryan Webb; and the Declaration of Gary Klinger and all exhibits and attachments thereto.

Dated: July 25, 2022

Respectfully submitted,

<p>Date: /s/ Gary M. Klinger</p> <p>Gary M. Klinger MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC 227 W. Monroe Street, Suite 2100 Chicago, IL 60606 Telephone: 866-252-0878 gklinger@milberg.com</p> <p>Katrina Carroll LYNCH CARPENTER, LLP 111 W. Washington Street, Suite 1240 Chicago, IL 60602 Telephone: 312-750-1265 katrina@lcllp.com</p> <p>Joseph P. Guglielmo** SCOTT+SCOTT ATTORNEYS AT LAW LLP 230 Park Avenue, 17th Floor New York, NY 10169 Telephone: 212-223-6444 jguglielmo@scott-scott.com</p> <p>Jonathan M. Jagher FREED KANNER LONDON & MILLEN LLC 923 Fayette Street Conshohocken, PA 19428 Telephone: 610-234-6487 jjagher@fklmlaw.com</p> <p>Frederick J. Klorczyk III*</p>	
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Attorneys for Plaintiffs

* *Pro hac vice* forthcoming

** *Pro hac vice*