

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

John Fralish, <i>on behalf of himself and</i>)	CASE NO. 3:22-cv-176-DRL-MGG
<i>others similarly situated,</i>)	
)	
Plaintiff,)	
)	
v.)	
)	
Ceteris Portfolio Services, LLC,)	
)	
Defendant.)	
_____)	

**PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES, COSTS,
LITIGATION EXPENSES, AND A SERVICE AWARD**

As a result of the all-cash, non-reversionary \$761,850.00 common fund established for the benefit of Settlement Class Members, John Fralish and Court-appointed Class Counsel respectfully move this Court for approval of (i) an award of attorneys’ fees of \$249,623.30, which is equal to 32.8% of the gross common fund, or 36 percent of the net common fund after deducting the costs of class notice and administration, the requested service award, and Class Counsel’s costs and litigation expenses; (ii) reimbursement of \$7,253.94 in costs and litigation expenses reasonably incurred during the course of the litigation; and (iii) a service award of \$5,000 to recognize Mr. Fralish’s dedicated efforts to the Settlement Class.

These requested awards are well in line with awards approved in similar class actions under the Telephone Consumer Protection Act, 47 U.S.C. § 227, both within and outside the Seventh Circuit. Given Mr. Fralish’s and his counsel’s dedication and hard work in achieving the excellent results obtained for the Settlement Class—which results will allow for anticipated per-claimant recoveries of more than \$400—the requested fee, expense, and service awards are reasonable, supported by the record and applicable law, and should be approved.

To date, no Settlement Class Member has objected to any of the foregoing requests. The deadline for objections is August 2, 2023.

Dated: June 27, 2023

/s/ Michael L. Greenwald
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