

COMMONWEALTH OF MASSACHUSETTS
HAMPDEN SUPERIOR COURT

BONITA JOYNER,

Plaintiff,

v.

BEHAVIORAL HEALTH NETWORK,
INC.,

Defendant.

Case No. 2079CV00629

11/15/2021

**PLAINTIFF'S MOTION FOR APPROVAL OF ATTORNEYS' FEES, EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARD**

Plaintiff Bonita Joyner, by counsel, in conjunction with final approval of the Stipulation and Agreement of Settlement (the "Settlement"), which is scheduled for hearing on December 14, 2021, respectfully moves the Court to approve and award the following payments from the \$1,200,000 Settlement Fund created by the Settlement:

1. Attorneys' fees to Class Counsel in the amount of \$400,000;
2. Reimbursement of litigation expenses to Class Counsel in the amount of \$11,312.93;
and
3. A service award to the Class Representative in the amount of \$5,000.

This motion is accompanied by a memorandum and joint declaration in support, along with a proposed order.

WHEREFORE, as part of final approval of the Settlement, Plaintiff respectfully moves the Court to approve and award the requested fees, expenses, and service award.

Dated: November 15, 2021

Respectfully submitted,

/s/ Michael S. Appel

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CERTIFICATE OF SERVICE

I, Michael S. Appel, hereby certify that I have on the above date served the foregoing by email and first-class mail, postage prepaid, to the following counsel of record:

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