

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MICHAEL NOURI, *on behalf of himself
and all others similarly situated,*

Plaintiff,

v.

UNIVERSITY OF SCRANTON,

Defendant.

CIVIL ACTION

Case No. 3:23-cv-1362-KM

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEYS’
FEES, COSTS, AND CASE CONTRIBUTION AWARD
TO SETTLEMENT CLASS REPRESENTATIVE**

Through undersigned counsel, Plaintiff Michael Nouri (“Plaintiff”) respectfully moves this Court for approval of reasonable attorneys’ fees, costs, and case contribution award to Settlement Class Representative pursuant to the proposed Stipulation of Settlement that this Court preliminarily approved in its Order dated September 18, 2024. Plaintiff moves for an award of attorneys’ fees in the amount of \$333,300 and litigation expenses in the amount of \$7,268.71 with such amounts to be paid from the Settlement Fund in accordance with the terms of the Settlement. Plaintiff additionally moves for a Case Contribution Award to the Settlement Class Representative in the amount of \$2,500.00. In further support of

this Motion, Plaintiff refers the Court to the contemporaneously filed memorandum of law and the Declaration of Nicholas A. Colella.

Dated: December 5, 2024

Respectfully submitted,

/s/ Nicholas A. Colella
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**Pro Hac Vice*

Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATION OF CONCURRENCE

I hereby certify that I have sought concurrence with counsel for Defendant as to the relief requested in this motion, and Defendant's concurrence has been given.

/s/ Nicholas A. Colella
Nicholas A. Colella

CERTIFICATE OF SERVICE

I hereby certify that, on December 5, 2024, a true and correct copy of the foregoing was filed through the Court's Electronic Case Filing (ECF) System and that the following attorneys of record are registered to receive notice of said filing through ECF:

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