UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

PHILIP FRYMAN, et al.,

Plaintiffs,

v.

ATLAS FINANCIAL HOLDINGS, INC., SCOTT D. WOLLNEY, and PAUL A. ROMANO,

Defendants.

Case No. 1:18-cv-01640

Hon. Franklin U. Valderrama United States District Judge

Hon. Sheila M. Finnegan United States Magistrate Judge

<u>Telephonic Hearing Date: September 6, 2023</u> <u>Time: 10:00 a.m.</u>

LEAD COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES

Court-appointed Lead Counsel Glancy Prongay & Murray LLP ("Lead Counsel"), on behalf of all Plaintiffs' Counsel, hereby respectfully move the Court for an Order: (i) awarding attorneys' fees to Lead Counsel; and (ii) reimbursing Plaintiffs' Counsel's Litigation Expenses.¹ Defendants take no position on the relief requested by this Motion.

The grounds in support of this Motion are set forth fully in the concurrently-filed Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and the Declaration of Kara M. Wolke in Support of:

(I) Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, and the exhibits attached thereto.

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation and Agreement of Settlement, dated November 28, 2022 (ECF No. 141-1).

Dated: August 2, 2023 Respectfully Submitted,

GLANCY PRONGAY & MURRAY LLP

By: s/ Kara M. Wolke

Kara M. Wolke Kevin F. Ruf Natalie S. Pang

1925 Century Park East, Suite 2100

Los Angeles, CA 90067 Telephone: (310) 201-9150 Email: kwolke@glancylaw.com Email: kruf@glancylaw.com Email: npang@glancylaw.com

Lead Counsel for Plaintiffs and the Settlement Class

LAWRENCE KAMIN LLC

Mitchell B. Goldberg
John S. Monical
Peter E. Cooper
300 S. Wacker Drive, Suite 500
Chicago, IL 60606
Telephone: (312) 372-1947

Email: mgoldberg@lawrencekaminlaw.com

jmonical@lawrencekaminlaw.com pcooper@lawrencekaminlaw.com

Liaison Counsel for Plaintiffs and the Settlement Class

LAW OFFICES OF HOWARD G. SMITH

Howard G. Smith 3070 Bristol Pike, Suite 112 Bensalem, PA 19020

Telephone: (215) 638-4847 Facsimile: (215) 638-4867

Additional Counsel

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered ECF participants.

<u>s/ Kara M. Wolke</u> Kara M. Wolke