

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

	x	
	:	Case No.: 1:21-cv-04529
David Jackson, individually and on behalf of all others similarly situated,	:	
	:	Honorable Nancy L. Maldonado
Plaintiff,	:	
	:	
vs.	:	
	:	
Discover Financial Services Inc.,	:	
	:	
Defendant.	:	
	x	

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

In conjunction with this Court’s approval of the parties’ class settlement and resulting all-cash, non-reversionary \$1 million common fund for the benefit of settlement class members, David Jackson and Court-appointed Class Counsel respectfully move this Court for approval of (i) an award of attorneys’ fees of \$294,002.66, which is equal to 29.4% of the gross common fund, or one-third 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 \$8,687.02 in costs and litigation expenses reasonably incurred during the course of the litigation; and (iii) a service award of \$10,000 to recognize Mr. Jackson’s dedicated efforts to the settlement class.

As explained in the accompanying memorandum of law, these requested awards are well in line with awards approved in similar class action litigation under the Telephone Consumer Protection Act, 47 U.S.C. § 227, both within and outside the Seventh Circuit. Given Mr. Jackson’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 \$100—the requested fee, expense, and service awards are reasonable, supported by the record and by applicable law, and should be approved.

To date, following dissemination of class notice, no settlement class member has objected to any of the foregoing requests. The deadline for objections is June 7, 2023.

Dated: April 21, 2023

/s/ Michael L. Greenwald
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