COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, ss

SUPERIOR COURT DEPARTMENT

C.A. No. . 2283CV00196

DANIEL GUARINO, individually and on behalf of all others similarly situated,

Plaintiff,

v.

RADIUS FINANCIAL GROUP, INC.,

Defendant.

MOTION FOR ATTORNEYS' FEES, EXPENSES, AND <u>SERVICE AWARD</u>

Plaintiff Daniel Guarino ("Plaintiff"), individually and behalf of others similarly situated, by and through his undersigned counsel of record, hereby moves for an order: (1) awarded combined attorneys' fees and case expenses in the amount of \$123,500, and; (2) awarding Plaintiff Daniel Guarino a service award of \$3500.

The grounds for this motion are set forth in the accompanying memorandum of law. This Motion is also supporting by the Settlement Agreement and all exhibits thereto, attached as Exhibit 1 to the memorandum in support of the Assented to Motion for Preliminary Approval, and the Declaration of David K. Lietz, attached to the memorandum in support of this motion. Date: October 27, 2023

Respectfully Submitted,

Plaintiff, DANIEL GUARINO, individually and on behalf of all others similarly situated,

By his attorneys, /s/ Douglas F. Hartman Douglas F. Hartman, BBO# 642823 HARTMAN LAW, P.C. 10 Post Office Square Suite 800 South Boston, Massachusetts 02109 T: 617-807-0091 F: 617-507-8334 dhartman@hartmanlawpc.com

David K. Lietz (admitted *pro hac vice*) **MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC** 5335 Wisconsin Avenue NW, Suite 440 Washington, D.C. 20015-2052 Tel: 202-744-1795 Fax: 202-686-2877 <u>dlietz@milberg.com</u>

Attorneys for Plaintiff and the Settlement Class