

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

Ben Hawkins, <i>on behalf of himself</i>	:	
<i>and all others similarly situated,</i>	:	Case No. 1:19-cv-01186
	:	
Plaintiff,	:	
v.	:	Hon. Judge Leonie M. Brinkema
	:	
Navy Federal Credit Union,	:	
	:	
Defendant.	:	
_____	:	

**PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND EXPENSES
AND FOR A CLASS REPRESENTATIVE SERVICE AWARD**

Pursuant to the Settlement Agreement in this action and Fed. R. Civ. P. 23(h), Plaintiff Ben Hawkins respectfully moves the Court for an order approving the payment of (1) \$2,775,000 for attorney fees (30% of the \$9,250,000 common fund); (2) \$12,323.10 for reimbursement of expenses; and (3) \$15,000 for a class representative service award. The legal and factual bases supporting this Motion are fully set forth in the Memorandum supporting this Motion filed concurrently, the Declaration of Jeffrey S. Goldenberg In Support of Plaintiff’s Motion (attached hereto as Exhibit 1), the Declaration of Ben Hawkins In Support of Plaintiff’s Motion (attached hereto as Exhibit 2), and Plaintiff’s Motion for Preliminary Approval of Class Action Settlement Agreement [Doc. 25] incorporated herein by reference. A proposed Order granting this Motion will be provided as an attachment to the Motion for Final Approval of the Class Action Settlement to be filed on October 2, 2020.

BEN HAWKINS, on behalf of himself
and all others similarly situated

Dated: July 8, 2020

By: /s/ David J. Dickens
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CERTIFICATE OF SERVICE

I hereby certify that, on July 8, 2020, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ David J. Dickens