

Claudine Hale,	*	In the Circuit Court
	*	
Plaintiff,	*	for Baltimore City
	*	
v.	*	
	*	
Mariner Finance, LLC,	*	Case No. 24C18000053
	*	
Defendant.	*	

* * * * *

**PLAINTIFF’S MOTION FOR AN
AWARD OF ATTORNEY’S FEES AND EXPENSES**

Plaintiff, Claudine Hale, through her undersigned attorneys, moves for an award of attorney’s fees of one-third of the \$1,500,000.00 common fund established by the settlement in this case, plus Class Counsel’s litigation expenses, which are currently \$726.90.

The award is supported by the background and history of this case, and by the exceptional results obtained by Class Counsel. Class members in this case are each entitled to claim a portion of the common fund, in an amount of up to three times the charges in their transactions which are challenged in this case. As discussed in the attached memorandum of law, such a recovery by class members would be unlikely absent the present litigation and proposed settlement.

A percentage award of attorney’s fees from a common fund successfully generated by class action litigation should be determined by “the fee customarily charged in the locality for similar legal services[.]” *United Cable Television of Baltimore Ltd. P’ship v. Burch*, 354 Md. 658, 688 (1999) (citing Maryland Rule of Professional Conduct 1.5(a)(3)). As discussed in the attached memorandum, the customary award of attorney’s fees in Maryland from a common fund in class action cases – including cases proceeding under the very same statute as this case – is one-third of the fund. Furthermore, also as discussed in the attached memorandum, each of the factors under Maryland Rule of Professional Conduct 1.5 supports the requested award.

Accordingly, for the reasons discussed above and in the attached memorandum of law, which is incorporated herein, the requested award is appropriate and reasonable and Plaintiff respectfully requests that it be approved.

WHEREFORE, Plaintiff respectfully requests that the Court award one-third of the common fund as attorney's fees, plus Class Counsel's litigation expenses, which are currently \$726.90.

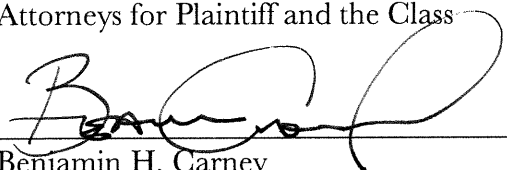
Dated: August 29, 2018

Respectfully submitted,

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By:



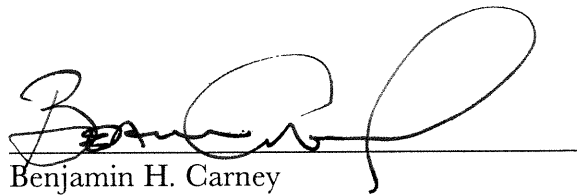
Benjamin H. Carney

Certificate of Service

I hereby certify, this 29th day of August, 2018, that I served a copy of the foregoing, by E-mail and first-class mail, postage pre-paid, on:

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