

DOCKET NO.: X07-HHD-CV-18-6090558-S : SUPERIOR COURT  
: :  
WILLIAM & LAURIE PAETZOLD : COMPLEX LITIGATION  
: :  
v. : JUDICIAL DISTRICT  
: HARTFORD  
METROPOLITAN DISTRICT :  
COMMISSION : AT HARTFORD  
: :  
: July 29, 2020

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEYS’ FEES, COSTS AND EXPENSES AND FOR SETTLEMENT CLASS REPRESENTATIVE AWARDS**

Plaintiffs William and Laurie Paetzold (“Plaintiffs” or “Settlement Class Representatives”), individually and on behalf of the proposed Settlement Class,<sup>1</sup> respectfully move that the Court:

- (a) Award attorneys’ fees, costs and expenses to Settlement Class Counsel in the combined amount of \$1,920,000 (\$1,913,240.77 for fees and \$6,759.23 for expenses), to be paid in accord with the terms of the Settlement Agreement; and
- (b) Award Settlement Class Representative Awards of \$5,000 to each of Plaintiffs William and Laurie Paetzold, to be paid in accord with the terms of the Settlement Agreement.

In support of this Motion, Plaintiffs state: (1) the requested fees are supported by the results achieved by Settlement Class Counsel and the risk they bore in prosecuting this litigation, as well as other factors considered by courts in determining an award of fees in complex class actions; (2) the expenses were reasonably and necessarily spent in furtherance of the litigation; and (3)

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<sup>1</sup> All capitalized terms have the meaning set out in the Settlement Agreement.

Plaintiffs devoted substantial time and effort to prosecuting the case on behalf of the Settlement Class.

In further support of this Motion, Plaintiffs have filed:

- a Memorandum of Law specific to this Motion; and
- supporting affidavits from (i) Seth R. Klein of IZARD KINDALL & RAABE, LLP and (ii) Jennifer M. Keough of JND Legal Administration, both of which also serve to support Plaintiffs' separate Motion for Confirmation of Modified Class Definition and Final Approval of Class Action Settlement.

Plaintiffs will file a Proposed Order by August 27, 2020 in conjunction with their final update as ordered by the Court, and also will respond to any objections at that time.

Dated: July 29, 2020

PLAINTIFFS

BY /s/ Seth R. Klein  
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Seth R. Klein  
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**CERTIFICATION**

I certify that on this 29<sup>th</sup> day of July, 2020, a copy of the foregoing was sent by email to all counsel of record as follows:

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