IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MICHAEL VIGLIANO, on behalf of himself and all others similarly situated,

Case No. 1:24-cv-00437-KMN

Plaintiff,

v.

GETTYSBURG COLLEGE,

Defendant.

PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS, AND CASE CONTRIBUTION AWARD TO SETTLEMENT CLASS REPRESENTATIVE

Through undersigned counsel, Plaintiff Michael Vigliano ("Plaintiff") respectfully moves this Court for approval of reasonable attorneys' fees, costs, and case contribution award to Settlement Class Representative pursuant to the proposed Stipulation of Settlement that this Court preliminarily approved in its Order dated March 10, 2025. Plaintiff moves for an award of attorneys' fees in the amount of \$244,975.50 and litigation expenses in the amount of \$813.00 with such amounts to be paid from the Settlement Fund in accordance with the terms of the Settlement. Plaintiff additionally moves for a Case Contribution Award to the Settlement Class Representative in the amount of \$2,500.00. In further support of this Motion,

Plaintiff refers the Court to the contemporaneously filed memorandum of law and the Declaration of Nicholas A. Colella.

Dated: May 23, 2025

Respectfully submitted,

<u>/s/ Nicholas A. Colella</u> Nicholas A. Colella PA ID No. 332699 **LYNCH CARPENTER, LLP** 1133 Penn Avenue, 5th Floor Pittsburgh, PA 15222 Phone: (412) 322-9243 NickC@lcllp.com

Michael Tompkins, Esq.* Anthony Alesandro, Esq.* **Leeds Brown Law, P.C.** 1 Old Country Road, Suite 347 Carle Place, NY 11514 516.873.9550 mtompkins@leedsbrownlaw.com aalesandro@leedsbrownlaw.com

*Pro Hac Vice

Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATION OF CONCURRENCE

I hereby certify that I have sought concurrence with counsel for Defendant as to the relief requested in this motion. Plaintiff's counsel was unable to obtain concurrence from Defendant prior to the deadline to file this motion.

> /s/ Nicholas A. Colella Nicholas A. Colella

CERTIFICATE OF SERVICE

I hereby certify that, on May 23, 2025, a true and correct copy of the foregoing was filed through the Court's Electronic Case Filing (ECF) System and that the following attorneys of record are registered to receive notice of said filing through ECF:

Kimberly M. Colonna McNEES WALLACE & NURICK LLC 100 Pine St., P.O. Box 1166 Harrisburg, PA 17108-1166 kcolonna@mcneeslaw.com

> <u>/s/ Nicholas A. Colella</u> Nicholas A. Colella