

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

NICHOLAS WILLIS and BETH SHVARTS,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

IHEARTMEDIA, INC., a Delaware
corporation,

Defendant.

Case No. 16 CH 02455

Honorable David B. Atkins

FILED-1
JUN 23 2016
CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
CHANCERY DIV.
DOROTHY BROWN
CLERK

**MOTION FOR AWARD OF ATTORNEYS' FEES,
EXPENSES, AND INCENTIVE AWARD**

Plaintiffs Nicholas Willis and Beth Shvarts (together, "Plaintiffs"), by and through their undersigned counsel, hereby respectfully request that the Court enter an Order approving their request for an award of reasonable attorneys' fees and expenses to Class Counsel¹ and an incentive award for their role as Class Representatives in connection with the Parties' proposed class action Settlement of this matter. Plaintiffs' motion is based upon this motion, the memorandum of points and authorities (and the exhibits attached thereto) in support of this motion, and the record in this matter, along with any oral argument that may be presented to the Court and evidence submitted in connection therewith at the Final Approval Hearing scheduled for August 11, 2016, at 2:00 p.m.

WHEREFORE, Plaintiffs Willis and Shvarts, individually and on behalf of the Settlement Class, respectfully request that the Court enter an Order (1) awarding Class Counsel's request for an award of attorneys' fees and expenses in the amount of \$3,400,000.00, (2)

¹ Except as otherwise indicated, all defined terms used herein shall have the same meanings ascribed to them in the Parties' proposed Class Action Settlement Agreement.

awarding a \$5,000.00 collective incentive award in recognition of their efforts on behalf of the Settlement Class, and (3) providing such other relief as the Court deems reasonable and just.

Respectfully submitted,

NICHOLAS WILLIS and **BETH SHVARTS**,
individually and on behalf of a class of similarly
situated individuals,

Dated: June 24, 2016

By: s/ Benjamin H. Richman
One of Plaintiffs' attorneys

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*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I, Benjamin H. Richman, an attorney, hereby certify that on June 24, 2016, I served the above and foregoing *Plaintiffs' Motion for Award of Attorneys' Fees, Expenses, and Incentive Award*, by causing true and accurate copies of such paper to be placed in postage prepaid envelopes addressed to the persons shown below and depositing such envelopes in the U.S. Mailbox located at 350 North LaSalle Street, Chicago, Illinois 60654, on this the 24th day of June 2016.

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s/ Benjamin H. Richman