

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

RAMONA CLARK and DYLAN  
SCHLOSSBERG, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

GANNETT CO., INC., a Delaware  
corporation,

Defendant.

Case No. 16 CH 06603

The Honorable Kathleen G. Kennedy

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

Plaintiffs Ramona Clark and Dylan Schlossberg (together, "Plaintiffs"), by and through their undersigned counsel, hereby respectfully request that the Court enter an Order approving Plaintiffs' request for an award of reasonable attorneys' fees and expenses to Class Counsel and incentive awards 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 law in support of this motion, the declaration of Eve-Lynn J. Rapp, the accompanying exhibits, and the record in this matter, along with any oral argument that may be presented to the Court, and any evidence submitted in connection therewith at the hearing on this motion.

**WHEREFORE**, Plaintiffs Ramona Clark and Dylan Schlossberg, individually and on behalf of the Settlement Class, respectfully request that the Court enter an Order (1) approving an award of \$5,382,000 in attorneys' fees and expenses to Class Counsel, (2) approving Plaintiffs' request for incentive awards of \$5,000 to Plaintiff Schlossberg and \$1,000 to Plaintiff Clark, and (3) providing such other and further relief as the Court deems reasonable and just.

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Dated: October 7, 2016

Respectfully submitted,

**RAMONA CLARK** and **DYLAN SCHLOSSBERG**, individually and on behalf of a class of similarly situated individuals,

By: /s/ Eve-Lynn J. Rapp  
One of Plaintiffs' attorneys

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**CERTIFICATE OF SERVICE**

I, Eve-Lynn J. Rapp, an attorney, hereby certify that on October 7, 2016, I served the above and foregoing *Motion for Award of Attorneys' Fees, Expenses, and Incentive Award*, by causing a true and accurate copy of such paper to be transmitted to the persons shown below via electronic mail on this the 7th day of October 2016.

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/s/ Eve-Lynn J. Rapp \_\_\_\_\_

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