

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ROBIN BREDA, *on behalf of herself and
all others similarly situated,*

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS,

Defendant.

Civil Action No. 1:16-cv-11512-DJC

MOTION FOR ATTORNEY’S FEES, EXPENSES, AND INCENTIVE AWARD

The Court conditionally certified a settlement class and preliminarily approved settlement agreement between Defendant Cellco Partnership d/b/a Verizon Wireless (“Defendant” or “Verizon”) and Plaintiff Robin Breda (“Plaintiff”), as class representative on behalf of the class. Doc. 241. Plaintiff now respectfully moves for entry of an order awarding payment of attorney’s fees, expenses, and an incentive award from the common fund generated by the settlement agreement.

The motion is filed at this time in accordance with the terms of the settlement agreement and to give class members an opportunity to review the motion before deciding how to respond to the class notice.

In support of this motion, Plaintiff submits the accompanying Memorandum of Law, the Settlement Agreement and its exhibits (1-5), and the Declarations from Class Counsel.

Per the Court’s preliminary approval order, the Court will hold a hearing on this motion at the Final Approval Hearing on April 28, 2022. Doc. 241 at 6-7. Plaintiff will submit a proposed order encompassing the relief requested herein with her motion for final approval of the settlement agreement, due on March 28, 2022. *Id.*

Dated: January 6, 2022

Respectfully Submitted,

ROBIN BREDA,

By her attorneys,

/s/ Sergei Lemberg

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CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2022, I served a true and accurate copy of the foregoing to counsel of record through the Court's CM/ECF system which sent notice of such filing to all counsel of record.

/s/ Keith J. Keogh

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