

Medgebow v. Checkers Drive-In Restaurants, Inc.

*PLAINTIFF'S APPLICATION FOR SERVICE AWARD,
ATTORNEYS' FEES, AND COSTS*

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:19-cv-80090-BLOOM/Reinhart

JOEL MEDGEBOW, individually
and on behalf of all others
similarly situated

Plaintiff,

vs.

CHECKERS DRIVE-IN RESTAURANTS
INC.,

Defendant.

**DECLARATION OF SETH M. LEHRMAN IN SUPPORT OF PLAINTIFF'S
APPLICATION FOR SERVICE AWARD, ATTORNEYS' FEES AND EXPENSES**

I, Seth M. Lehrman, pursuant to 28 U.S.C. Sec. 1746, declare under perjury that the following is true and correct:

1. I am one of the attorneys designated as Class Counsel for Plaintiff under the Settlement Agreement entered into with Defendant. I submit this declaration in support of Plaintiff's Application for Service Award, Attorneys' Fees and Costs. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

2. Prosecuting and settling these claims demanded considerable time and labor, making this fee request reasonable.

3. Class Counsel devoted substantial time to investigating the claims against Defendant.

4. Class Counsel also expended resources researching and developing the legal claims at issue.

5. Time and resources were also dedicated to conducting formal discovery, motion practice, depositions, and trial preparation.

6. Settlement negotiations consumed further time and resources. The mediation and post-mediation sessions required substantial preparation and time commitment. Finally, significant time was devoted to negotiating and drafting of the Agreement and the preliminary approval process, and to all actions required thereafter pursuant to the preliminary approval order, including oversight of the notice plan to ensure proper implementation. All of this work consumed a substantial amount of time.

7. Class Counsel also request reimbursement for a total of \$3,252.67, in litigation costs. This sum corresponds to certain actual out-of-pocket costs that Class Counsel necessarily incurred and paid in connection with the prosecution of the Action and the Settlement Class Counsel's out-of-pocket litigation expenses include:

Expense:	Amount:
Filing Fee	\$400.00
Research/PACER fees:	\$119.47
Mediation Costs/Travel:	\$122.50
Mediator Fee:	\$3,067.00
TOTAL	\$3,708.97

* * *

I declare under penalty of perjury of the laws of Florida and the United States that the foregoing is true and correct, and that this declaration was executed in Fort Lauderdale, Florida, on July 29, 2019.

/s/ Seth M. Lehrman
Seth M. Lehrman