

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION**

IN RE 2014 RADIOSHACK ERISA LITIGATION)	MASTER FILE NO. 4:14-cv-00959-O
)	
THIS DOCUMENT RELATES TO:)	
)	
ALL ACTIONS)	

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND CASE CONTRIBUTION AWARDS TO NAMED PLAINTIFFS**

Named Plaintiffs Jeffrey Snyder, Manoj P. Singh, and William A. Gerhart (“Plaintiffs”), on behalf of the Settlement Class of participants in the RadioShack 401(k) Plan and the RadioShack Puerto Rico 1165(e) Plan (the “Plans”), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Awarding attorneys’ fees in the amount of \$270,000, which represents 30% of the Settlement Amount;
2. Reimbursement of out-of-pocket expenses of \$40,616.03;
3. Approval of Named Plaintiffs’ Case Contribution Awards of \$5,000 to each of the three Plaintiffs in recognition of their valuable service to the Settlement Class; and
4. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

A. Memorandum of Law in Support of Plaintiffs’ Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs; and

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement, Certification of Settlement Class, and Approval of the Plan of Allocation and Motion For an Award of Attorneys’ Fees, Reimbursement of Expenses and Case Contribution Awards to the Named Plaintiffs, and all exhibits thereto.

Dated: June 10, 2016

Respectfully submitted,

/s/ Mark K. Gyandoh

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

/s/ Mark K. Gyandoh _____

Mark K. Gyandoh

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION

_____)	
IN RE 2014 RADIOSHACK ERISA)	MASTER FILE NO. 4:14-cv-00959-O
LITIGATION)	
)	
THIS DOCUMENT RELATES TO:)	Class Action
)	
ALL ACTIONS)	Jury Demanded
_____)	

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES,
AND CASE CONTRIBUTION AWARDS TO NAMED PLAINTIFFS**

This matter comes before the Court on Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to Named Plaintiffs ("Fee Motion"). Plaintiffs' Fee Motion was heard on July 18, 2016.

The Court having considered papers submitted in support of the Fee Motion and any opposition thereto, and finding that no objections have been filed with regard to the Fee Motion, and for good cause having been shown, Plaintiffs' Fee Motion is hereby granted.

IT IS FURTHER ORDERED THAT,

1. Class Counsel is hereby awarded attorneys' fees in the amount of 30% (\$270,000.00) of the Settlement Fund, which the Court finds to be fair and reasonable, and \$40,616.03 in reimbursement of Class Counsel's reasonable litigation expenses incurred in prosecuting the Action. The attorneys' fees and expenses so awarded shall be paid from the Qualified Settlement Fund pursuant to the terms of the Class Action Settlement Agreement and Release Between Plaintiffs and Defendants Wells Fargo Bank, N.A. and Banco Popular De Puerto Rico (the "Settlement" or "Settlement Agreement"), as provided in the Settlement

Agreement, with interest on such amounts from the date the Qualified Settlement Fund was funded to the date of payment at the same net rate that the Qualified Settlement Fund earns. All fees and expenses paid to Class Counsel shall be paid pursuant to the timing requirements described in the Settlement Agreement.

2. Named Plaintiffs Manoj P. Singh, Jeffrey Snyder, and William A. Gerhart are hereby awarded Case Contribution Awards in the amount of \$5,000 each.

3. In making this award of attorneys' fees and reimbursement of expenses to be paid from the Qualified Settlement Fund, and the compensation awards to the Named Plaintiffs, the Court has considered and conditionally finds that:

a) The Settlement achieved as a result of the efforts of Class Counsel has created a fund of \$900,000.00 in cash that is already on deposit, plus interest thereon, and will benefit thousands of Settlement Class Members;

b) Class Counsel have conducted the litigation and achieved the Settlement with skill, perseverance, and diligent advocacy;

c) The Action involves complex factual and legal issues prosecuted over thirteen months and, in the absence of a settlement, would involve further lengthy proceedings with uncertain resolution of the complex factual and legal issues;

d) Had Class Counsel not achieved the Settlement, there would remain a significant risk that the Named Plaintiffs and the Settlement Class may have recovered less or nothing from Defendants;

e) The amount of attorneys' fees awarded and expenses reimbursed from the Qualified Settlement Fund are consistent with awards in similar cases; and

f) The Named Plaintiffs rendered valuable services to the Settlement Class. Without their participation, there would have been no case and no Settlement.

SO ORDERED this _____ day of _____, 2016.

HON. REED O'CONNOR
United States District Judge