

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

IN RE: MOVEIT CUSTOMER DATA
SECURITY BREACH LITIGATION

MDL No. 1:23-md-03083-ADB-PGL

This Document Relates To:

1:23-cv-12478
1:23-cv-12281
1:23-cv-12561
1:24-cv-11523
1:23-cv-12226
1:23-cv-12273

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS FOR THE
SETTLEMENT CLASS REPRESENTATIVES**

Pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, Plaintiffs¹ in the above captioned actions consolidated with this multi-district litigation (“Plaintiffs” or “Settlement Class Representatives”) respectfully moves for entry for an order:

1. Approving Class Counsel’s request for an award of attorneys’ fees in the amount of one-fourth (25%) of the Settlement Fund, totaling \$2,125,000.00;
2. Approving Class Counsel’s request for reimbursement of reasonable litigation expenses in the amount of \$25,710.00.00; and

¹ Plaintiffs are Denise Peel, Kristen Eyester, Juan Salas, Patricia Callahan, Kayla Farrar, and Justin Okeke.

3. Approving Service Awards of \$2,500.00 to each of the Settlement Class Representative in recognition of their participation on behalf of the Settlement Class.

In support of this motion, Plaintiffs rely on the accompanying memorandum of law and supporting Declarations of Gary F. Lynch and Alyson Oliver. A proposed order will be submitted to the Court with Plaintiffs' forthcoming motion for final approval of the Nuance Communications settlement.

DATED: November 3, 2025

Respectfully submitted,

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Plaintiffs' Lead Counsel

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that, pursuant to Local Rule 7.1(a)(2), that counsel for Plaintiff have conferred in good faith with counsel for Defendant Cadence Bank, and Defendant does not oppose this Motion.

Dated: November 3, 2025

/s/ Gary F. Lynch
Gary F. Lynch

CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record.

Dated: November 3, 2025

/s/ Kristen A. Johnson
Kristen A. Johnson (BBO# 667261)