

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SHARON CHENG, CRISTINA DIAS,
RHONDA SANFILIPO, BRUCE PULEO,
ZINA PRUITT, RON ZIMMERMAN,
CHERYL SILVERSTEIN, TINA FENG,
ROBERT HAKIM, BERNADETTE GRIMES,
ELIZABETH GENDRON, ROGER CARTER,
MARLENE RUDOLPH, PATRICIA
BARLOW, TERESA EDWARDS, ISAAC
TORDJMAN, JAMES HETTINGER, DIEU
LE, CHRIS BOHN, DANIEL DEWEERDT,
CRAIG BOXER, BETTY DENDY,
ELIZABETH PERSAK, KRISTI ROCK,
JENNIFER CHALAL, JOHN TORRANCE,
LENARD SHOEMAKER, MICHAEL
MITCHELL, ROBERT SKELTON, JEFFREY
JONES, ISABEL MARQUES, PAYAM
RASTEGAR, and SYED ABDUL NAFAY,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

TOYOTA MOTOR CORPORATION,
TOYOTA MOTOR NORTH AMERICA, INC.,
and DENSO INTERNATIONAL AMERICA,
INC.,

Defendants.

Case No: 1:20-cv-00629-WFK-JRC

**PLAINTIFFS' CORRECTED UNOPPOSED MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND SERVICE AWARDS TO THE CLASS REPRESENTATIVES**

Plaintiffs, on behalf of themselves and the proposed Class, respectfully submit this corrected unopposed Motion¹ pursuant to Rule 23(h) of the Federal Rules of Civil Procedure for

¹ See text order dated November 23, 2022 granting Plaintiffs' motion (ECF No. 178) to file a corrected motion, memorandum of law and joint declaration in support (ECF Nos. 175, 176).

an award of attorneys' fees in the amount of \$28,500,000.00; for reimbursement of \$384,073.26 in unreimbursed litigation expenses that were reasonably and necessarily incurred in prosecuting and resolving the action; and for \$2,500 to be awarded as service awards to each of the Class Representatives in this action in recognition of their contributions to the successful prosecution of this case.

This motion is based on the contemporaneously-filed memorandum of law in support; the Joint Declaration of W. Daniel "Dee" Miles, III, and Demet Basar, as well as the Declarations of Elbert F. Nasis, Jeffrey R. Krinsk, Jeffrey L. Spector, Jerrod C. Patterson, and Malcom T. Brown, together with all exhibits thereto; and all pleadings, records, and papers on file with the Court in this action.

Dated: November 23, 2022

Respectfully submitted,

/s/ W. Daniel "Dee" Miles, III

W. Daniel "Dee" Miles, III (*pro hac vice*)

/s/ Demet Basar

Demet Basar

H. Clay Barnett, III (*pro hac vice*)

J. Mitch Williams (*pro hac vice*)

Dylan T. Martin (*pro hac vice*)

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Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I hereby certify that on November 23, 2022, a copy of the foregoing was filed electronically via the Court's CM/ECF system. Notice of this filing will be sent to the Parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

s/ W. Daniel "Dee" Miles, III
W. Daniel "Dee" Miles, III