

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF ARKANSAS
NORTHERN DIVISION**

ERIK KNIGHT and JUNG KIM,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PROGRESSIVE NORTHWESTERN
INSURANCE COMPANY, PROGRESSIVE
DIRECT INSURANCE COMPANY,
PROGRESSIVE CASUALTY INSURANCE
COMPANY, PROGRESSIVE SPECIALTY
INSURANCE, and PROGRESSIVE
CLASSIC INSURANCE COMPANY, Ohio
corporations,

Defendants.

Case No.: 3:22-cv-00203-JM

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES,
LITIGATION EXPENSES, AND SERVICE AWARDS**

In accord with the Settlement Agreement (the "Settlement Agreement"), Class Counsel respectfully move this Court for an award of attorneys' fees of \$3,963,531, which represents 30% of the available cash benefits of \$13,211,773 or roughly 23% of the total Settlement value of \$17,404,049, and reimbursement of litigation expenses in the amount of \$112,000. In addition, Class Counsel request that this Court award Plaintiffs Erik Knight and Jung Kim ("Plaintiffs" or "Settlement Class Representatives") service awards in the amounts of \$10,000 and \$5,000, respectfully.

By the Court's Preliminary Approval Order, dated May 19, 2025 (*see* ECF No. 184), this Court preliminarily approved the Settlement, conditionally certified the Settlement Classes, and directed that the notice be sent to Settlement Class Members informing them of the terms of the

Settlement and their rights with respect thereto. As set forth in the supplemental declarations of Hank Bates and Cameron Azari, being filed concurrently herewith, Class Counsel complied with the Preliminary Approval Order, including notice to Settlement Class Members that Counsel would be seeking an award of attorneys' fees of \$3,963,531, reimbursement of out-of-pocket litigation expenses not to exceed \$112,000, as well as service awards to the Class Representatives in the aggregate amount of \$15,000, and, to date, not one Settlement Class Member has objected. *See* Declaration of Cameron R. Azari, Esq. on Implemental and Adequacy of Settlement Notice Plan ("Supp. Azari Declaration") at ¶ 22.

Being filed contemporaneously herewith are Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Award of Attorneys' Fees, Litigation Expenses, and Service Awards, and the aforementioned declarations. For the reasons set forth in the aforementioned papers, Class Counsel respectfully request that this Court award attorneys' fees of 30% of the available cash benefits of \$13,211,773 or roughly 23% of the total Settlement value of \$17,404,049.90 (*i.e.* \$3,963,531.90); award Class Counsel reimbursement of litigation expenses in the amount of \$112,000; and award service awards of \$15,000 for the two Class Representatives (\$10,000 for Plaintiff Knight and \$5,000 for Plaintiff Kim).

Dated: August 1, 2025

Respectfully submitted,

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