

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Craftwood Lumber Company, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

Senco Brands, Inc.,

Defendant.

Case No. 1:14-cv-06866

Hon. John Robert Blakey

Plaintiff Craftwood Lumber Company's Motion for Incentive Fee Award
to Class Representative

Plaintiff Craftwood Lumber Company, through its undersigned counsel, hereby moves this Court for an incentive fee award of \$35,430 to Craftwood, the class representative.

This request is based on the ground that courts in this District recognize the need to compensate class representatives, like Craftwood, for their service to the class. The granting of an incentive award also promotes the larger public interest of ensuring that active and diligent class representatives are at the head of class actions. Here, because Craftwood took an especially active role in this matter—including fending off three five-figure pick-off attempts by Defendant Senco Brands, Inc.—an award of \$35,430 is justified. Class members have already been informed that Plaintiff will seek this amount, and none have expressed disapproval.

The motion is based on the attached Memorandum of Points and Authorities; the Declarations and Exhibits filed concurrently herewith; the Settlement Agreement and Release previously lodged with the Court (D.E. 145); the previously filed Motion for Preliminary Approval of Class Action Settlement (D.E. 146); the concurrently filed Motion for Final Approval of Class Action Settlement and Certification of Settlement Class; all other pleadings and papers filed in this case; and on such further briefs and argument of counsel that will be received before or during the hearing on the motion.

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DATED: April 5, 2017

PAYNE & FEARS LLP

/s/ C. Darryl Cordero

C. Darryl Cordero

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Attorneys for Plaintiff Craftwood Lumber Company,
on behalf of itself and all others similarly situated

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on this Fifth day of April, 2017, he caused the foregoing **Plaintiff Craftwood Lumber Company's Motion for Incentive Fee Award to Class Representative** to be filed electronically with the Clerk of Court using the CM/ECF system, and which will send electronic notification to the following:

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