

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

SAT NARAYAN d/b/a EXPRESS HAULING, et al.,)	
)	
Plaintiffs,)	Case No. 1:16-cv-11223
)	
v.)	Chief Judge Rebecca R. Pallmeyer
)	
FIFTH THIRD BANK, et al.,)	
)	
Defendants.)	
)	

**PLAINTIFFS’ MOTION TO SUPPLEMENT THEIR PETITION
FOR ATTORNEYS’ FEES, COSTS, AND INCENTIVE AWARDS**

Plaintiffs Sat Narayan d/b/a Express Hauling, Robert Meyer d/b/a Mangia Nosh, and Taysir Tayeh d/b/a Chief’s Market (collectively, “Plaintiffs”) move to supplement their petition for an award of attorneys’ fees, costs, and incentive awards (Doc. 678) as follows:

Over 32,000 class members submitted a claim in connection with the settlement with the Fifth Third/Vantiv Defendants. The average settlement payment is estimated to be approximately \$992.69 per class member. Due to, among other things, these large payments going to a large number of class members the settlement administrator has provided a revised estimate of \$791,192.44 to administer the settlement with the Fifth Third/Vantiv Defendants to completion. Because settlement administration costs are being deducted prior to the calculation of Class Counsel’s requested fee award, Plaintiffs seek to supplement their previously filed fee petition (Doc. 678) by reducing the amount of attorneys’ fees requested to \$16,397,935.90.¹

¹ The revised amount of attorneys’ fees requested by Class Counsel is calculated as follows: \$50,000,000 less \$791,192.44 in administration costs, less \$15,000 in incentive awards = \$49,193,807.60. One-third of \$49,193,807.60 = \$16,397,935.90.

WHEREFORE, Plaintiffs respectfully request the Court to allow Plaintiffs to supplement their petition for attorneys' fees, costs, and incentive awards to provide for a request of \$16,397,935.90 in attorneys' fees.

Dated: July 7, 2022

Respectfully submitted,

By: /s/ Jacie C. Zolna
One of Plaintiffs' Attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing **Plaintiffs' Motion to Supplement Their Petition for Attorneys' Fees, Costs, and Incentive Awards** upon:

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via the electronic filing system, on the 7th day of July, 2022.

/s/ Jacie C. Zolna