

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

MATTHEW LaPRADE, *individually and on behalf  
of all others similarly situated,*

Plaintiff,

v.

INDECK POWER EQUIPMENT  
COMPANY,

Defendant.

Case No. 2021-CH-00805

The Honorable Eve M. Reilly

**PLAINTIFF'S NOTICE OF UNOPPOSED MOTION FOR  
ATTORNEYS' FEES, COSTS, EXPENSES, AND SERVICE AWARD**

PLEASE TAKE NOTICE that on June 29, 2023, at 9:30 a.m. via Zoom (Meeting ID: 943 7767 4389 and Password: 980847), or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Eve M. Reilly, or anyone sitting in her stead, and shall then and there present Plaintiff's Unopposed Motion for Attorneys' Fees, Costs, Expenses, and Service Award, a copy of which is attached hereto and hereby served upon you, to move the Court to:

- a. Approve an incentive award to Plaintiff of \$2,500; and
- b. Approve an award of attorneys' fees, costs, and expenses of forty percent (40%) of the Settlement Fund, \$26,730 to Class Counsel.

Plaintiff's Motion is based on: this Notice, Plaintiff's Motion for Attorneys' Fees, Costs, Expenses, and Service Award; the Settlement Agreement; and the Declaration of Philip L. Fraietta and all exhibits and attachments thereto.

Dated: May 1, 2023

Respectfully submitted,

/s/ Carl V. Malmstrom  
**WOLF HALDENSTEIN ADLER  
FREEMAN & HERZ LLC**  
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*Local Counsel for Plaintiff and the Class*

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*\* Pro Hac Vice Application Forthcoming*

*Class Counsel*