

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

SHEET METAL WORKERS LOCAL 19)	Civil Action No. 2:20-cv-00856-RDP
PENSION FUND, Individually and on Behalf)	
of All Others Similarly Situated,)	<u>CLASS ACTION</u>
)	
Plaintiff,)	LEAD COUNSEL’S MOTION FOR AN
)	AWARD OF ATTORNEYS’ FEES AND
vs.)	EXPENSES
)	
PROASSURANCE CORPORATION, et al.,)	
)	
Defendants.)	
)	

Lead Counsel respectfully move the Court for an order awarding attorneys' fees and expenses, and for awards to Lead Plaintiffs pursuant to 15 U.S.C. §78u-4(a)(4) in connection with their representation of the Settlement Class.

In support of this motion, Lead Counsel submit herewith the Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses, the Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation, the Joint Declaration of Nathan R. Lindell and Lester R. Hooker in Support of: (I) Motion for Final Approval of Class Action Settlement and Approval of Plan of Allocation; and (II) Motion for an Award of Attorneys' Fees and Expenses, the Declaration of David M. Murphy, the Declaration of Ross D. Murray, Lead Plaintiffs' Counsel's Declarations, all other pleadings and matters of record, and such additional evidence or argument as may be presented at or before the hearing.

A proposed order will be submitted with Lead Counsel's reply submission on or before January 10, 2024.

DATED: December 8, 2023

Respectfully submitted,

GUIN, STOKES & EVANS, LLC
DAVID J. GUIN
TAMMY M. STOKES
DAWN STITH EVANS

s/David J. Guin

DAVID J. GUIN

300 Richard Arrington Jr. Blvd. N.
Suite 600/Title Bldg.
Birmingham, AL 35203
Telephone: 205/226-2282
205/226-2357 (fax)
davidg@gseattorneys.com
tammys@gseattorneys.com
devans@gseattorneys.com

ROGER BEDFORD, ATTORNEY AT LAW, LLC
P.O. Box 1149
Russellville, AL 35653
Telephone: 256/332-6966
265/332-6967 (fax)

Local Counsel for Lead Plaintiffs

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART
(admitted *pro hac vice*)
X. JAY ALVAREZ
(admitted *pro hac vice*)
NATHAN R. LINDELL
(admitted *pro hac vice*)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
elleng@rgrdlaw.com
jaya@rgrdlaw.com
nlindell@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
BAILIE L. HEIKKINEN
(admitted *pro hac vice*)
MASON G. ROTH
(admitted *pro hac vice*)
225 NE Mizner Boulevard, Suite 720
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)
bheikkinen@rgrdlaw.com
mroth@rgrdlaw.com

SAXENA WHITE P.A.
STEVEN B. SINGER
(admitted *pro hac vice*)
SARA DILEO (admitted *pro hac vice*)
KYLA GRANT (admitted *pro hac vice*)
10 Bank Street, 8th Floor
White Plains, NY 10606
Telephone: 914/437-8551
888/631-3611 (fax)
ssinger@saxenawhite.com
sdileo@saxenawhite.com
kgrant@saxenawhite.com

SAXENA WHITE P.A.
JOSEPH E. WHITE, III
(admitted *pro hac vice*)
LESTER R. HOOKER
(admitted *pro hac vice*)
JONATHAN LAMET
(admitted *pro hac vice*)
7777 Glades Road, Suite 300
Boca Raton, FL 33434
Telephone: 561/394-3399
561/394-3382 (fax)
jwhite@saxenawhite.com
lhooker@saxenawhite.com
jlamet@saxenawhite.com

Lead Counsel for Lead Plaintiffs

CAVANAGH & O'HARA
JOHN T. LONG
(admitted *pro hac vice*)
2319 West Jefferson Street
Springfield, IL 62702
Telephone: 217/544-1771
217/544-9894 (fax)
johnlong@cavanagh-ohara.com

Additional Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on December 8, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ DAVID J. GUIN

DAVID J. GUIN

300 Richard Arrington Jr. Blvd. N.
Suite 600/Title Bldg.
Birmingham, AL 35203
Telephone: 205/226-2282
205/226-2357 (fax)

Email: davidg@gseattorneys.com

Mailing Information for a Case 2:20-cv-00856-RDP Sheet Metal Workers Local 19 Pension Fund v. ProAssurance Corporation et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **X. Jay Alvarez**
jaya@rgrdlaw.com
- **Walter W Bates**
Bbates@starneslaw.com
- **Roger H Bedford , Jr**
rogerbedfordattorneyatlawllc@gmail.com
- **Sara M. DiLeo**
sdileo@saxenawhite.com
- **James Bringham Eubank**
James.Eubank@beasleyallen.com
- **Dawn Stith Evans**
devans@gseattorneys.com
- **Jay M Ezelle**
JEzelle@starneslaw.com
- **Janet A Gochman**
jgochman@stblaw.com
- **Kyla Grant**
Kgrant@saxenawhite.com
- **Cole Robinson Gresham**
cgresham@starneslaw.com
- **David J Guin**
davidg@gseattorneys.com
- **Bailie L Heikkinen**
bheikkinen@rgrdlaw.com
- **Lester R. Hooker**
lhooker@saxenawhite.com
- **Jonathan Dov Lamet**
jlamet@saxenawhite.com
- **Michael R Lasserre**
mrl@starneslaw.com
- **Nathan R Lindell**
nlindell@rgrdlaw.com

- **John T Long**
johnlong@cavanagh-ohara.com
- **Carl Jacob Lundqvist**
jacob.lundqvist@stblaw.com
- **Craig Corey Marder**
cmarder@saxenawhite.com
- **Wilson Daniel Miles , III**
dee.miles@beasleyallen.com
- **Mason G Roth**
mroth@rgrdlaw.com
- **Steven B Singer**
ssinger@saxenawhite.com
- **Ellen Gusikoff Stewart**
elleng@rgrdlaw.com
- **Tammy McClendon Stokes**
tammys@gseattorneys.com
- **Joseph E. White**
jwhite@saxenawhite.com
- **Jonathan K Youngwood**
jyoungwood@stblaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)