

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

KEDDRICK BROWN, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

v.

PROGRESSIVE MOUNTAIN  
INSURANCE COMPANY,

Defendant.

Consolidated Case No.:  
3:21-cv-00175-TCB

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MICHELLE BOST, individually and  
on behalf of all others similarly  
situated,

Plaintiff,

v.

PROGRESSIVE PREMIER  
INSURANCE COMPANY OF  
ILLINOIS,

Defendants.

**PETITION FOR ATTORNEYS'  
FEES, EXPENSES, AND SERVICE AWARDS**

Pursuant to Federal Rule of Civil Procedure 23(h), Plaintiffs and Class Counsel hereby move this Court for an Order that (i) approves attorneys' fees of

\$14,333,333.33, (ii) approves costs of \$303,275.24, and (iii) approves a Service Award of \$10,000.00 to both Plaintiff Bost and Plaintiff Brown.

In further support of this Motion, Plaintiffs and Class Counsel incorporate by reference the accompanying Memorandum of Law (Exhibit 1) and submit the Declaration of Brian Fitzpatrick (Exhibit 2) and Declaration of Jacob Phillips (Exhibit 3).

Respectfully submitted this 31st day of March, 2025.

*/s/ Jake Phillips*

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\*Admitted *pro hac vice*

*Counsel for Plaintiffs and the Classes*



**CERTIFICATE OF SERVICE**

I, Jacob L. Phillips, hereby certify that on this 31st day of March, 2025, I electronically filed the foregoing via the Court's CM/ECF system, which will provide electronic notification to all counsel of record.

/s/Jake Phillips  
Attorney for Plaintiffs