

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Stanford Glaberson, et. al,	§	Civ. No. 03-6604 (JP)
	§	The Honorable John R. Padova
Plaintiffs,	§	
	§	
v.	§	
	§	
Comcast Corporation, et al.	§	
	§	
Defendants.	§	

**PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES,
REIMBURSEMENT OF EXPENSES, AND PAYMENT OF SERVICE AWARD TO
CLASS REPRESENTATIVE**

Plaintiff, by his undersigned counsel, respectfully moves this Court for an order (i) awarding attorneys’ fees and reimbursement of litigation expenses in the amount of \$15 million, representing necessary and reasonably incurred litigation expenses currently in the amount of \$8,574,896.16 and the balance of \$6,425,103.84 as attorneys’ fees; and (ii) approving a service award for the Court appointed Class Representative Stanford Glaberson in the amount of \$10,000. The detailed (long form) class notice approved by the Court in its Order-Memorandum dated December 12, 2014, preliminarily approving the Settlement and certifying the Settlement Class, ECF No. 614 (“Order”), advises Class Members that Plaintiff will request an award of \$15 million in attorneys’ fees and expenses and a service award in the amount of \$10,000 for the Class Representative. Pursuant to the Settlement and the Court’s Order, the class notices will be disseminated as soon as practicable and no later than 120 days after the Order. This information is also available on the website, www.CableSettlement.com, developed by the Court appointed administrator, Rust Consulting, Inc., effective on January 9, 2015.

In support of this Motion, Plaintiff’s Lead Class Counsel submits the accompanying Plaintiff’s Memorandum in Support of Motion for an Award of Attorneys’ Fees, Reimbursement

of Expenses and Payment of Service Award to Class Representative and the Declarations of Lead Counsel and the Declarations of Class Counsel.

Pursuant to L.R. 7.1(b), the parties have conferred and Comcast's counsel has advised Plaintiff's counsel that Comcast does not oppose this Motion.

WHEREFORE, based on the foregoing and for the reasons set forth in the accompanying Memorandum, we respectfully urge the Court to grant Plaintiff's Motion.

Dated: January 12, 2015

Respectfully submitted,

s/ David Woodward
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Co-Lead Counsel for Plaintiff and the Settlement Class

CERTIFICATE OF CONFERENCE

Sheron Korpus, counsel of record for Comcast, has advised that Comcast does not oppose this Motion.

s/ David Woodward

David Woodward

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on this day, January 12, 2015, he caused to be served copies of the foregoing Motion; Memorandum in Support of Plaintiff's Application for an Award of Attorneys' Fees, Reimbursement of Expenses, and Payment of Service Award to Class Representative; Declaration of David Woodward and Exhibits A-T (Declaration of David Woodward Relating to Co-Lead Class Counsel Heins Mills & Olson, P.L.C.'s Time and Expenses, Declaration of Barry Barnett, and Declarations of Class Counsel) and text of Proposed Order on the following counsel by the Court's ECF system.

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