

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

REBECCA NOCERA, TRACY MICHEL,  
JENNIFER ROSSMAN, ANGELA  
RENEAU, FELICIA SAMMARCO, JOHN J.  
NOTTO, STEVEN WILLNER and  
HEATHER SHARP, individually and on  
behalf of all others similarly situated,

Case No. 2:18-cv-01222

Plaintiffs,

v.

DOLLAR GENERAL CORPORATION  
D/B/A DOLLAR GENERAL,  
DOLGENCORP, LLC D/B/A DOLLAR  
GENERAL, DOLGEN NEW YORK, LLC,  
DG RETAIL, LLC, AND DOLGEN  
CALIFORNIA, LLC,

Defendants.

**MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS**

Through their undersigned counsel, Plaintiffs Rebecca Nocera, Tracy Michel, Jennifer Rossman, Angela Reneau, Felicia Sammarco, John J. Notto, Steven Willner, and Heather Sharp (“Plaintiffs” or “Named Plaintiffs”) respectfully move this Court for approval of reasonable attorneys’ fees and costs pursuant to the proposed Class Action Settlement that this Court preliminarily approved in its Order dated January 27, 2021 (“Amended Preliminary Approval Order”)(Dkt. No. 78)<sup>1</sup> The total amount Plaintiff requests for approval of all fees and costs in this litigation is \$385,000.00. Plaintiff is entitled to reasonable attorneys’ fees and costs pursuant to 42 U.S.C. § 12205. Defendant does not oppose this motion.

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<sup>1</sup> The Settlement Agreement was attached as Exhibit 1 to the Unopposed Amended Motion for Preliminary Approval of Class Action Settlement (“Preliminary Approval Motion”) (Dkt. No. 75-76).

Attached to this Motion as Exhibit 1 is the Declaration of R. Bruce Carlson, and attached as Exhibit 2 is the Declaration of Christina Asbee.

WHEREFORE, for the reasons set forth in the supporting brief filed herewith, Plaintiff respectfully requests that the Court enter the attached Proposed Order directing Defendant to pay attorneys' fees and costs to class counsel consistent with the terms of the Class Action Settlement.

Dated: February 10, 2021

Respectfully submitted,

/s/ R. Bruce Carlson  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on Wednesday, February 10, 2021, a true and correct copy of PLAINTIFFS' MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS was served on all counsel of record via the Court's electronic filing system.

By: /s/ R. Bruce Carlson