

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY**

CATHERINE DUFFY, MATTHEW	:	
EDLIN, LAWRENCE MULCAHY,	:	
PAULA HALL, individually and on	:	
behalf of all others similarly situated,	:	Case No. 3:24-cv-388-BJB
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
MAZDA MOTOR OF AMERICA, INC.	:	CLASS ACTION
D/B/A MAZDA NORTH AMERICAN	:	
OPERATIONS and MAZDA MOTOR	:	
CORPORATION,	:	
	:	JURY TRIAL DEMANDED
Defendants.	:	
	:	
	:	

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, EXPENSES,
AND SERVICE AWARDS**

Pursuant to the Court's order granting preliminary approval of the proposed Settlement Agreement ("Settlement Agreement" or "SA"), Plaintiffs respectfully seek an Order approving Mazda Motor of America, Inc., d/b/a Mazda North American Operations and Mazda Motor Corporation's, payment to be allocated as follows: (i) \$1,900,000 for Class Counsel's attorneys' fees, which includes \$59,500.31 for Class Counsel's litigation costs and expenses; and (iii) Service awards of \$4,000 for Plaintiff Duffy and \$2,500 for each of the three Class Representatives (\$11,500 total).

This motion is based on this notice, the accompanying Memorandum of Law, the Declarations of Andrew W. Ferich, Benjamin F. Johns, Troy M. Frederick, and Keith T. Vernon and all other documents and arguments submitted in support thereof.

A proposed order addressing the relief requested in this motion is filed contemporaneously herewith.

Dated: June 11, 2025

Respectfully submitted:



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CERTIFICATE OF SERVICE

I certify that on this 11th day of June 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, and it was emailed to the following counsel of record:

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A handwritten signature in black ink, appearing to read "B. Johns", written over a horizontal line.

Benjamin F. Johns