

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

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| CS WANG & ASSOCIATE, <i>et al.</i>, |) | |
| |) | |
| Plaintiffs, |) | Case No. 1:16-cv-11223 |
| |) | |
| v. |) | Chief Judge Rebecca R. Pallmeyer |
| |) | |
| WELLS FARGO BANK, N.A., <i>et al.</i>, |) | |
| |) | |
| Defendants. |) | |
| |) | |

**PLAINTIFFS’ MOTION TO SUPPLEMENT THEIR PETITION
FOR ATTORNEYS’ FEES, COSTS, AND INCENTIVE AWARDS**

Plaintiffs CS Wang & Associate and Jay Schmidt Insurance Agency, Inc. (collectively, “Plaintiffs”) move to supplement their petition for an award of attorneys’ fees, costs, and incentive awards (Doc. 622) as follows:

Nearly 24,000 class members submitted a claim in connection with the settlement with the Wells Fargo Defendants. The average settlement payment is estimated to be approximately \$774.19 per class member.¹

Due to, among other things, these large payments going to a large number of class members the settlement administrator has provided a revised estimate of \$403,091.88 to administer the settlement with the Wells Fargo Defendants to completion. Because settlement administration costs are being deducted prior to the calculation of Class Counsel’s requested fee

¹ A declaration from the settlement administrator is being submitted in connection with Plaintiffs’ motion for final approval of the settlement, filed contemporaneously herewith (*see* Doc. 648), that provides more specific and updated information on claims and expected recoveries.

award, Plaintiffs seek to supplement their previously filed fee petition (Doc. 622) by reducing the amount of attorneys' fees requested to \$9,195,636.²

WHEREFORE, Plaintiffs respectfully request the Court to allow Plaintiffs to supplement their petition for attorneys' fees, costs, and incentive awards to provide for a request of \$9,195,636 in attorneys' fees with the requested amount for costs (\$83,191.45) and incentive awards (\$5,000 to each Plaintiff) remaining unchanged.

Dated: November 29, 2021

Respectfully submitted,

By: /s/ Jacie C. Zolna
One of Plaintiffs' Attorneys

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² The revised amount of attorneys' fees requested by Class Counsel is calculated as follows: \$28,000,000 less \$403,091.88 in administration costs, less \$10,000 in incentive awards = \$27,586,908.10. One-third of \$27,581,908.10 = \$9,195,636.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing **Plaintiffs' Motion to Supplement Their Petition for Attorneys' Fees, Costs, and Incentive Awards** upon:

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via the electronic filing system, on the 29th day of November, 2021.

/s/ Jacie C. Zolna