

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

NEIL KRAN, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC., a
Delaware corporation, A MARKETING
RESOURCE, LLC, a Minnesota limited
liability company,

Defendants.

Case No. 0:15-cv-02058-MJD-BRT

**PLAINTIFF'S MOTION FOR AWARD OF REASONABLE
ATTORNEYS' FEES, EXPENSES, AND INCENTIVE AWARD**

Plaintiff Neil Kran, pursuant to Fed. R. Civ. P 23(h), respectfully requests that the Court enter an Order approving Plaintiff's request for an award of reasonable attorneys' fees and expenses to Class Counsel and an incentive award for his role as Class Representative in connection with the Parties' proposed class action settlement of this matter. Plaintiff's motion is based upon this motion, the memorandum of law in support of this motion, the Declaration of Eve-Lynn J. Rapp, the accompanying Exhibits, and the record in this matter, along with any oral argument that may be presented to the Court, and any evidence submitted in connection therewith at the hearing on this motion.

WHEREFORE, Plaintiff Neil Kran, individually and on behalf of the Settlement

Class, respectfully requests that the Court enter an Order (1) approving an award of \$700,000.00 in attorneys' fees and expenses to Class Counsel, (2) approving an incentive award of \$1,000.00 in recognition of his efforts on behalf of the Settlement Class, and (3) providing such other and further relief as the Court deems reasonable and just.

Dated: August 19, 2016

Respectfully submitted,

NEIL KRAN, individually and on behalf of all others similarly situated,

By: /s/ Eve-Lynn J. Rapp
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Eve-Lynn J. Rapp, an attorney, hereby certify that on August 19, 2016, I served the above and foregoing ***Plaintiff's Motion for Award of Reasonable Attorneys' Fees, Expenses, and Incentive Award*** by causing a true and accurate copy of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system, on this the 19th day of August 2016.

/s/ Eve-Lynn J. Rapp
