

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RACHEL CULLINANE, JACQUELINE  
NUNEZ, ELIZABETH SCHAUL, and  
ROSS McDONAGH, on behalf of themselves  
and others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,

Defendant.

CIVIL ACTION NO. 1:14-cv-14750

Hon. Douglas P. Woodlock

**PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS, AND  
SERVICE AWARDS**

Plaintiffs Rachel Cullinane, Jacqueline Nunez, Elizabeth Schaul, and Ross McDonagh (“Plaintiffs”) and Defendant Uber Technologies, Inc. (“Uber”), have reached a class action settlement of this matter (the “Settlement”) which was previously filed with the Court, ECF # 100-1, and as to which the Court approved the issuance of Notice on September 20, 2019. ECF # 116.<sup>1</sup>

Plaintiffs now move, for the reasons set forth in their accompanying Memorandum in Support, for an award of attorneys’ fees of \$900,303, and litigation expenses of \$8,697. Plaintiffs also request Service Awards of \$5,000 for each named Plaintiff, and approval of notice and administrative expenses which are currently estimated to be approximately \$70,000. All together these amounts total \$999,000. Plaintiffs’ proposed Final Approval Order will incorporate Plaintiffs’ requested attorneys’ fee, costs, class administration expenses, and service awards.

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<sup>1</sup> All capitalized terms have the meanings set forth in the Parties’ Class Action Settlement Agreement (“Agreement”), previously filed at ECF # 100-1.

Plaintiffs request that these fees and costs be approved at or after the Final Approval hearing scheduled for January 23, 2020.

Dated: November 22, 2019

Respectfully submitted,

/s/ Elizabeth Ryan

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#### **CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF) on November 22, 2019.

/s/ Elizabeth Ryan

Elizabeth Ryan