

COMMONWEALTH OF MASSACHUSETTS

ESSEX, ss.

SUPERIOR COURT DEPARTMENT

ELAINE LAFRATTA, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MEDICAL HEALTHCARE SOLUTIONS,
INC.,

Defendant.

Case No. 2277CV00106
(Lead Case)

Consolidated With:

CHRISTIAN DONNER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MEDICAL HEALTHCARE SOLUTIONS,
INC.,

Defendant.

Case No. 2277CV00108

-and-

EVAN WEISENFELD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MEDICAL HEALTHCARE SOLUTIONS,
INC.,

Defendant.

Case No. 2277CV00110

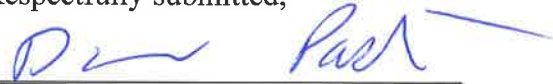
**MOTION FOR AWARD OF ATTORNEYS'
FEES, COSTS, EXPENSES, AND A SERVICE AWARD**

Pursuant to this Court's October 5, 2023 Order Allowing Preliminary Approval of Class Action Settlement and Directing Notice of Proposed Settlement ("Preliminary Approval Order"),¹ Plaintiff Elaine LaFratta ("Plaintiff"), by and through her undersigned counsel of record, hereby moves for an award of attorneys' fees in the sum of \$242,422.00, costs and expenses in the sum of \$6,567.16, and a Service Award of \$2,000 to the Class Representative.

The grounds for this motion are set forth in the accompanying memorandum of law. This Motion is also supported by the Declarations of Ben Barnow and David Pastor, submitted contemporaneously herewith.

Dated: December 22, 2023

Respectfully submitted,



David Pastor

dpastor@pastorlawoffice.com

BBO # 391000

PASTOR LAW OFFICE, PC

63 Atlantic Avenue, 3d Floor

Boston, MA 02110

Phone: (617) 742-9700

BEN BARNOW (*pro hac vice*)

b.barnow@barnowlaw.com

ANTHONY L. PARKHILL (*pro hac vice*)

aparkhill@barnowlaw.com

RILEY W. PRINCE (*pro hac vice*)

rprince@barnowlaw.com

BARNOW AND ASSOCIATES, P.C.

205 West Randolph Street, Ste. 1630

Chicago, IL 60606

Tel: 312.621.2000

Fax: 312.641.5504

Counsel for Plaintiff

¹ The Preliminary Approval Order provides that the "[d]eadline for Plaintiff to File Motion for Attorneys' Fees, Costs, and Expenses, and Service Award for the Class Representative" is "14 Days prior to Objection Deadline," or December 22, 2023.