

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID GLADFELTER, *on behalf of
himself and all others similarly
situated,*

Plaintiff,

v.

SUSQUEHANNA UNIVERSITY,

Defendant.

Case No. 4:24-cv-00382-MWB

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEYS’
FEES, COSTS, AND CASE CONTRIBUTION AWARD
TO SETTLEMENT CLASS REPRESENTATIVE**

Through undersigned counsel, Plaintiff David Gladfelter (“Plaintiff”) respectfully moves this Court for approval of reasonable attorneys’ fees, costs, and case contribution award to Settlement Class Representative pursuant to the proposed Stipulation of Settlement that this Court preliminarily approved in its Order dated November 27, 2024. Plaintiff moves for an award of attorneys’ fees in the amount of \$225,000 and litigation expenses in the amount of \$4,655 with such amounts to be paid from the Settlement Fund in accordance with the terms of the Settlement. Plaintiff additionally moves for a Case Contribution Award to the Settlement Class Representative in the amount of \$2,500.00. In further support of this Motion,

Plaintiff refers the Court to the attached memorandum of law and the Declaration of Nicholas A. Colella.

Dated: February 10, 2025

Respectfully submitted,

/s/ Nicholas A. Colella
Nicholas A. Colella
PA ID No. 332699
LYNCH CARPENTER, LLP
1133 Penn Avenue, 5th Floor
Pittsburgh, PA 15222
Phone: (412) 322-9243
NickC@lcllp.com

Anthony Alesandro, Esq.*
Leeds Brown Law, P.C.
1 Old Country Road, Suite 347
Carle Place, NY 11514
516.873.9550
aalesandro@leedsbrownlaw.com
**Pro Hac Vice*

Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATION OF CONCURRENCE

I hereby certify that I have sought concurrence with counsel for Defendant as to the relief requested in this motion, and Defendant's concurrence has been given.

/s/ Nicholas A. Colella
Nicholas A. Colella

CERTIFICATE OF SERVICE

I hereby certify that, on February 10, 2025, a true and correct copy of the foregoing was filed through the Court's Electronic Case Filing (ECF) System and that the following attorneys of record are registered to receive notice of said filing through ECF:

Michael E. Baughman
TROUTMAN PEPPER HAMILTON SANDERS LLP
3000 Two Logan Square
18th and Arch Streets
Philadelphia, PA 19103
Michael.Baughman@troutman.com

Adam R. Martin
TROUTMAN PEPPER HAMILTON SANDERS LLP
Suite 200, 100 Market Street
P.O. Box 1181
Harrisburg, PA 17108-1181
Adam.Martin@troutman.com

/s/ Nicholas A. Colella
Nicholas A. Colella