

UNITED STATES COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|---|---|------------------------|
| CYNTHIA RUSSO, LISA BULLARD, |) | Case No. 1:17-cv-02246 |
| RICARDO GONZALES, INTERNATIONAL |) | |
| BROTHERHOOD OF ELECTRICAL |) | <u>CLASS ACTION</u> |
| WORKERS LOCAL 38 HEALTH AND |) | |
| WELFARE FUND, INTERNATIONAL |) | Judge Edmond E. Chang |
| UNION OF OPERATING ENGINEERS |) | |
| LOCAL 295-295C WELFARE FUND, and |) | |
| STEAMFITTERS FUND LOCAL 439, On |) | |
| Behalf of Themselves and All Others Similarly |) | |
| Situated, |) | |
| |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| vs. |) | |
| |) | |
| WALGREEN CO., |) | |
| |) | |
| |) | |
| Defendant. |) | |
| |) | |
| _____ |) | |

**MOTION FOR AWARD OF ATTORNEYS’ FEES
AND EXPENSES, AND SERVICE AWARDS TO PLAINTIFFS**

Plaintiffs Cynthia Russo, Lisa Bullard, Richard Gonzales (the “Individual Plaintiffs”), International Brotherhood of Electrical Workers Local 38 Health and Welfare Fund, International Union of Operating Engineers Local 295-295c Welfare Fund, and Steamfitters Fund Local 439 (the “Fund Plaintiffs,” and with the Individual Plaintiffs, “Plaintiffs”), by and through their undersigned counsel, respectfully move this Court, pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2) and the Court’s Order Granting Preliminary Approval of Class Action Settlement, for entry of an Order: (1) awarding Class Counsel attorneys’ fees equaling \$30 million, plus interest at the same rate and for the same period as that earned by the Settlement Fund, for the work done by Class Counsel and Plaintiffs’ counsel of record; (2) awarding out-of-pocket litigation expenses of \$2,457,229.92 incurred in the prosecution of the Litigation; and (3) awarding \$5,000

each to Individual Plaintiff and class representative Ms. Russo, Ms. Bullard, and Mr. Gonzales, and \$15,000 each to TPP Plaintiff and class representative International Brotherhood of Electrical Workers Local 38 Health and Welfare Fund, International Union of Operating Engineers Local 295-295c Welfare Fund, and Steamfitters Fund Local 439 as Service Awards for their participation in the Litigation.

This motion is based upon the Stipulation, the accompanying Memorandum of Law, the Joint Declaration of Joseph P. Guglielmo and Arthur L. Shingler, Declarations of Daryl F. Scott of Scott+Scott Attorneys at Law LLP, Declaration of Arthur L. Shingler of Robbins Geller Rudman and Dowd LLP, Susan M. Coler of Halunen Law LLC, Charles E. Schaffer of Levin Sedran & Berman LLP, Joseph S. Tusa of Tusa P.C., Andrew A. Lemon of Lemmon Law Firm LLC, David I. Cates of The Cates Law Firm LLC, Jeremy R. Williams of Milberg Coleman Bryson Phillips Grossman, PLLC, George C. Aguilar of Robbins LLP, Cynthia Russo, Lisa Bullard, Ricardo Gonzales, Ed Fox of International Brotherhood of Electrical Workers Local 38 Health and Welfare Fund, John Catalano of International Union of Operating Engineers Local 295-295c Welfare Fund, and Charles Bailey, Jr. of Steamfitters Find Local 439 and all other papers and proceedings herein.

DATED: March 4, 2025

Respectfully submitted,
SCOTT+SCOTT ATTORNEYS AT LAW LLP

s/ Joseph P. Guglielmo
Joseph P. Guglielmo (IL Bar #2759819)
Amanda M. Rolon (*pro hac vice*)
The Helmsley Building
230 Park Avenue, 24th Floor
New York, NY 10169
Telephone: 212-223-4478
Facsimile: 212-233-6334
jguglielmo@scott-scott.com
arolon@scott-scott.com

Erin Green Comite (IL Bar #420630)
SCOTT+SCOTT ATTORNEYS AT LAW LLP
156 S. Main Street
P.O. Box 192
Colchester, CT 06415
Telephone: 860-531-2632
Facsimile: 860-537-4432
ecomite@scott-scott.com

David W. Mitchell (IL Bar # 199706)
Brian O. O'Mara (IL Bar # 229737)
Arthur L. Shingler (IL Bar # 181719)
**ROBBINS GELLER RUDMAN
& DOWD LLP**
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619-231-1058
Facsimile: 619-231-7423
davidm@rgrdlaw.com
bomara@rgrdlaw.com
ashingler@rgrdlaw.com

Paul J. Geller
Mark J. Dearman
Stuart A. Davidson
**ROBBINS GELLER RUDMAN
& DOWD LLP**
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561-750-3000
Facsimile: 561-750-3364
pgeller@rgrdlaw.com
mdearman@rgrdlaw.com
sdavidson@rgrdlaw.com

Interim Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

/s/ Joseph P. Guglielmo
Joseph P. Guglielmo