

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**IN RE: TELEXFREE SECURITIES
LITIGATION**

MDL No. 4:14-md-2566-TSH

**This Document Relates to:
ALL CASES**

MOTION FOR REIMBURSEMENT OF ATTORNEY EXPENSES

Plaintiffs hereby move the Court for reimbursement of certain attorney expenses incurred in the course of this litigation. Plaintiffs seek entry of an order directing reimbursement of \$683,600.00 in litigation expenses to Class Counsel from the Settlement Fund.

The grounds for this motion are that (1) the efforts of Class Counsel and Plaintiffs have created a common fund for the benefit of others; (2) that Class Counsel and Plaintiffs are entitled to reimbursement of their reasonable expenses incurred in creating that benefit; and (3) that the litigation expenses are reasonable and necessary for the successful prosecution of this litigation.

This motion is based upon this Motion, the Memorandum of Points and Authorities, the Declaration of Robert J. Bonsignore and accompanying exhibits, and the Proposed Order filed concurrently herewith, the complete files and records in this action, and such other written or oral arguments that may be presented to the Court.

WHEREFORE, Plaintiffs respectfully request that the Court enter the order attached hereto granting their Motion for Reimbursement of Attorney Expenses.

Dated: July 8, 2020

Respectfully submitted,

TELEXFREE CLASS PLAINTIFFS
By their attorneys,

/s/ Robert J. Bonsignore

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CERTIFICATE OF SERVICE

I, Robert J. Bonsignore, hereby certify that on this 8th day of July 2020, I caused the foregoing to be electronically filed with the Clerk of the Court by using the Case Management/Electronic Case Filing (CM/ECF) system, which will send a notice of electronic filing to all parties registered with the CM/ECF system in the above-captioned matter. A copy will be forwarded via first class mail, postage prepaid, to those parties not electronically registered at their last and/or only known address.

1. MOTION FOR REIMBURSEMENT OF ATTORNEY EXPENSES AND ATTACHED PROPOSED ORDER;
2. MEMORANDUM IN SUPPORT OF MOTION FOR REIMBURSEMENT OF ATTORNEY EXPENSES;
3. ATTACHMENT A: DECLARATION OF ROBERT J. BONSIGNORE IN SUPPORT OF MOTION FOR REIMBURSEMENT OF ATTORNEY EXPENSES INCLUDING EXHIBITS 1 AND 2.

/s/ Robert J. Bonsignore

Robert J. Bonsignore