

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: TELEXFREE SECURITIES  
LITIGATION

MDL No. 4:14-md-02566-TSH

This Document Relates To:

ALL CASES

**MOTION FOR AN INTERIM AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF EXPENSES**

Lead Plaintiff Anthony Cellucci, by and through the undersigned Settlement Class Counsel, and pursuant to the Court's minute entry of October 3, 2023 (Dkt. No. 1748), which adopted Plaintiffs' proposed Preliminary Order of Settlement Approval with modifications, respectfully moves the Court for the entry of an Order awarding the following payments regarding the class-action settlement of this matter: (1) Class Counsel attorneys' fees in the amount of \$31,841,667.00, which represents one-third of the total value of the 2023 Settlements that have received preliminary approval; and (2) reimbursement of a limited set of litigation expenses totaling \$927,312.98.

This Motion is supported by the following materials: a separately-filed Memorandum of Law and a separately-filed Declaration of Interim Lead Counsel.

WHEREFORE, Plaintiff respectfully requests that the Court enter the Order attached to this Motion as **Exhibit 1**.

**RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), the undersigned counsel for Plaintiffs contacted impacted defense counsel phone and all counsel by email on November 17, 2023, regarding this Motion; as of the time of this filing, Plaintiffs have not received any objections to the filing of this Motion.

Dated: November 17, 2023

Respectfully submitted,  
TELEXFREE CLASS COUNSEL

/s/ Robert J. Bonsignore  
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***Plaintiffs' Interim Lead Counsel***

**CERTIFICATE OF SERVICE**

I, Robert J Bonsignore, 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 Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 17, 2023.

*/s/ Robert J. Bonsignore*  
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Robert J. Bonsignore