

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS**

	)	
SARAH HAPKA, individually, and on behalf of	)	
all others similarly situated,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:16-cv-02372-KGG
	)	
CARECENTRIX, INC.,	)	
	)	
Defendant.	)	
	)	
	)	

**PLAINTIFF’S MOTION FOR  
AN AWARD OF ATTORNEYS’ FEES, EXPENSES, AND COSTS TO CLASS COUNSEL  
AND A CLASS REPRESENTATIVE SERVICE AWARD**

Pursuant to Federal Rule of Civil Procedure 54(d), Plaintiff Hapka hereby moves for an award of attorneys’ fees, expenses and costs to her counsel, Stueve Siegel Hanson LLP (“Class Counsel”) and a class representative service award to be paid by Defendant CareCentrix, Inc. (“CareCentrix”). In support of this motion, Plaintiff Hapka states as follows:

1. Class Counsel’s application for attorneys’ fees, expenses, and costs is based on CareCentrix’s agreement in the Settlement Agreement and Release, *see* Doc. 89-1 at ¶ 60, to pay Class Counsel’s reasonable attorneys’ fees, expenses, and costs as determined by the Court. For the reasons detailed in the memorandum in support of this motion, Plaintiff Hapka respectfully requests an award to Class Counsel of \$475,000 in attorneys’ fees and \$18,822 in reimbursable expenses and costs.

2. CareCentrix has agreed not to oppose a class representative service award in the amount of \$2,500 to Plaintiff Hapka. As further explained in the contemporaneously-filed

memorandum in support of this motion, Plaintiff Hapka respectfully requests a service award in the amount of \$2,500 as compensation for her significant contributions to this case.

3. This motion is supported by the Declaration of Barrett J. Vahle, Class Counsel and one of the principal lawyers representing Plaintiff Hapka. Mr. Vahle attests to Class Counsel's reasonable number of hours, reasonable hourly rates, and the skill, experience, and reputation of Class Counsel and their law firm.

4. This motion is also supported by the Declaration of Richard H. Ralston (Ret.), formerly a Magistrate Judge at the United States District Court for the Western District of Missouri. Judge Ralston attests to Class Counsel's skill, experience, and reputation, and their reasonable hourly rates.

5. This motion is further supported by judicial orders from federal and state courts in the Kansas City area and around the country.

WHEREFORE, for the reasons stated herein and in the accompanying memorandum in support, Plaintiff Hapka respectfully requests the Court grant this Motion for an Award of Attorneys' Fees, Expenses, and Costs to Class Counsel and Class Representative Service Award; that the Court order Defendant CareCentrix, Inc. to pay Class Counsel their reasonable attorneys' fees in the amount of \$475,000 and reasonable expenses in the amount of \$18,822; and that the Court approve a class representative service award to Plaintiff Hapka in the amount of \$2,500.

Dated: December 8, 2017

Respectfully submitted,

**STUEVE SIEGEL HANSON LLP**

*/s/ Barrett J. Vahle*

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

By: /s/ Barrett J. Vahle  
Barrett J. Vahle