

STATE OF MINNESOTA

DISTRICT COURT

HENNEPIN COUNTY

FOURTH JUDICIAL DISTRICT
CASE TYPE: CIVIL OTHER

Edain Altamirano Flores; Esperanza Herrera;
Lori Nicol; Olutundun Arike Ogundipe;
Jason Beck; Patricia Goggin; Norma Juarez;
and Bruno Gorostieta, on behalf of
themselves and all others similarly situated,

Court File No. 27-CV-16-14225
Class Action
Judge Mary R. Vasaly

Plaintiffs,

v.

Spiros Zorbalas; Stephen Frenz; Equity
Residential Holdings, LLC; National
Housing Fund, LLC; The Apartment Shop,
LLC; ERT, LLC; Quarters for Creativity,
LTD.; Emerald Square Properties, Inc.;
Hennepin Quarters, Inc.; Powderhorn
Quarters, Inc.; Hiawatha Quarters, Inc.; 25
& 3146 Properties, Inc.; Lahaha Holdings,
Inc.; Arts Avenue Properties, Inc.; SS
Quarters, Inc.; Berkeley Holdings, Inc.;
1801 Properties, Inc.; SZ112, Inc.; S1322,
Inc.; R110, Inc.; G121, Inc.; Alpha-Omega
Companies, Inc.; JAS Apartments, Inc.;
Jennifer Frenz; Mary Brandt; and 2020
Vision Investments, LLC,

Defendants.

**PLAINTIFFS' AND CLASS
COUNSEL'S NOTICE OF MOTION
AND MOTION FOR ATTORNEYS' FEE
AWARD, COST AWARD, AND CLASS
REPRESENTATIVE SERVICE AWARD**

TO: ALL DEFENDANTS AND THEIR COUNSEL OF RECORD AND THE CLASS

PLEASE TAKE NOTICE that Plaintiffs and the counsel appointed by the Court to represent the class ("Class Counsel") in the above-captioned matter hereby move the Court pursuant to Minnesota Rule of Civil Procedure 23.08 for an award of \$6,000,000 in attorneys' fees, for an award to Class Counsel of \$269,372.49 in costs and expenses, for an award of the costs associated with administration of the settlement to the Settlement Administrator, and for a

\$10,000 service award to each class representative. This Motion is based upon the accompanying Memorandum of Law, the accompanying Affidavit of Michael F. Cockson, the accompanying Affidavit of Isaac B. Hall, the Settlement Agreement between Defendants and the Class, the arguments of counsel as may be allowed or needed, and the files, records, and proceedings herein.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on this Motion on the 27th day of December, 2018, at 8:30 a.m., or as soon thereafter as counsel may be heard before the Honorable Mary R. Vasaly, at the Hennepin County Government Center, Courtroom 1955, 300 South Sixth Street, Minneapolis, Minnesota 55487.

Dated: November 21, 2018

Respectfully Submitted,

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Attorneys for Plaintiffs

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, Subd. 3, sanctions may be imposed if, after notice and a reasonable opportunity to respond, the Court determines that the undersigned has violated the provisions of Minn. Stat. § 549.211, Subd. 2.

s/ Michael F. Cockson _____
Michael F. Cockson