

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS**

CARLA PLOWMAN, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

TY INC.,

Defendant.

Case No. 2024 CH 000205

**PLAINTIFF’S UNOPPOSED MOTION FOR ATTORNEY FEES
AND SERVICE AWARD**

COMES NOW Plaintiff Carla Plowman, through undersigned counsel, and requests this Court to:

1. Award requested attorneys’ fees in the amount of \$159,000, as provided for by the Settlement Agreement; and
2. Approve a Service Award to Plaintiff in the amount of \$5,000, as provided for by the Settlement Agreement.

This Motion is based on: (1) this Motion; (2) Plaintiff’s Memorandum in Support (“Memorandum”); (3) the Declaration of Cassandra P. Miller, attached as **Exhibit A** to the Memorandum; (4) the Settlement Agreement; (5) the Court’s Order Granting Preliminary Approval of Class Action Settlement; (6) the records, pleadings, and papers filed in this action; and (7) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: May 2, 2025

Respectfully submitted,

By: /s/ Cassandra Miller

Cassandra Miller (SBN 6290238)

Samuel J. Strauss (SBN 6340331)

Raina C. Borrelli (*pro hac vice*)

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Attorneys for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, a copy of the foregoing was filed electronically via Odyssey eFileIL. Notice of this filing will be sent by email to counsel of record by operation of the court's electronic filing system.

DATED this 2nd day of May, 2025.

STRAUSS BORRELLI PLLC

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