

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GRACIE WHITE f/k/a GRACIE DORNEUS,
on behalf of herself and others similarly situated,

Plaintiff,

v.

ALLY FINANCIAL, INC.,

Defendant.

Civil Action No. 3:18-CV-30143-MGM

**PLAINTIFF'S UNOPPOSED MOTION FOR AWARD
OF ATTORNEYS' FEES, COSTS, AND INCENTIVE PAYMENT**

Plaintiff Gracie White and Ally Financial, Inc. have reached a class action settlement of this matter which the Court granted preliminary approval of on June 30, 2021. ECF # 121.

Ms. White now moves, for the reasons set forth in her accompanying Memorandum in Support, for an incentive payment of \$7,500, as well as an award of attorneys' fees and costs of \$2,500,000. Ms. White's proposed Final Approval Order incorporates her requested attorneys' fee and costs and the proposed incentive payment.

Date: September 14, 2021

Respectfully submitted,

GRACIE WHITE f/k/a GRACIE DORNEUS,

By her attorneys,

/s/ Elizabeth Ryan

Elizabeth Ryan (BBO No. 549632)

John Roddy (BBO No. 424240)

Bailey & Glasser LLP

176 Federal Street, 5th Floor

Boston, MA 02110

(617) 439-6730 (phone)

(617) 951-3954 (fax)

eryan@baileyglasser.com

jroddy@baileyglasser.com

Raven Moeslinger (BBO No. 687956)
Nicholas F. Ortiz (BBO No. 655135)
Law Office of Nicholas F. Ortiz, P.C.
50 Congress Street, Suite 540
Boston, MA 02109
(617) 338-9400
rm@mass-legal.com

CERTIFICATE OF SERVICE

I, Elizabeth Ryan, hereby certify that today I caused to be served the within on counsel for the defendant via ECF service.

/s/ Elizabeth Ryan

Elizabeth Ryan