

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)**

TIFFANY JOHNSON,	*	
Plaintiff,	*	
v.	*	Civil Action No. 8:22-cv-02001-PX
	*	(lead)
CONTINENTAL FINANCE COMPANY, LLC, <i>et al.</i> ,	*	
Defendants.	*	

	*	
TRACEY CRIDER,	*	
Plaintiff,	*	
v.	*	Civil Action No. 8:23-cv-00854-PX
	*	(member)
CONTINENTAL FINANCE COMPANY, LLC, <i>et al.</i> ,	*	
Defendants.	*	

* * * * *

**Motion for Approval of Incentive Award
to the Representative Plaintiffs**

Pursuant to ¶ 25 of the Settlement Agreement in this case (ECF No. 73-2), Representative Plaintiffs Tiffany Johnson and Tracey Crider (“Representative Plaintiffs”) respectfully requests that this Court approve an incentive awards to them of \$25,000 each – awards which will be paid to them by Defendants Continental Finance Company, LLC and Continental Purchasing, LLC separate and apart from the Common Fund, and which will not diminish or affect the relief to other Settlement Class Members. The requested award is warranted because Representative Plaintiffs secured the proposed Settlement in this case not only on behalf of themselves, but in favor of more than 72,000 other similarly situated consumers. This type of award is both permissible and desirable where, as here, a class action has achieved a significant benefit for a large number of people as the result of a lawsuit filed on their behalf by

class representatives.

Further grounds and authorities in support of this Motion are contained in the accompanying memorandum of law, which is incorporated.

WHEREFORE, Representative Plaintiffs respectfully request that this Court approve incentive payments to them of \$25,000 each, to be paid by Continental, and that the Court enter the attached comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.

Respectfully submitted,

/s/ Benjamin H. Carney

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