

**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 Award of Attorney’s Fees  
to Class Counsel**

Pursuant to Fed. R. Civ. P. 23(h), and ¶ 24(b)(i) of the Settlement Agreement in this case (ECF No. 73-2), Representative Plaintiffs Tiffany Johnson and Tracey Crider (“Representative Plaintiffs”) respectfully requests approval of an award of attorney’s fees equal to one-third of the \$5.75 million Common Fund created by the Settlement Agreement.

This Motion is well within the benchmark applied in similar cases, especially considering the results of this case. Additional grounds and authorities for this Motion are in the accompanying Memorandum of Law, which is incorporated.

WHEREFORE, Representative Plaintiff respectfully requests that the Court approve an award of attorney’s fees of one-third of the \$5.75 million Common Fund, and enter the comprehensive proposed Final Order Approving Settlement and

Certifying Settlement Class.

Respectfully submitted,

/s/Benjamin H. Carney

Benjamin H. Carney (Fed. Bar No. 27984)

Richard S. Gordon (Fed. Bar No. 06882)

GORDON, WOLF & CARNEY, CHTD.

11350 McCormick Rd.

Executive Plaza 1, Suite 1000

Hunt Valley, Maryland 21031

Tel. (410) 825-2300

Fax. (410) 825-0066

[rgordon@GWCfirm.com](mailto:rgordon@GWCfirm.com)

[bcarney@GWCfirm.com](mailto:bcarney@GWCfirm.com)

**Attorneys for Representative  
Plaintiffs and the Settlement Class**