

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

MARIA CAMILA VALENCIA RIOS,  
AQUARIUS FILALI, and NADJI FILALI,  
*on behalf of themselves and all similarly situated  
individuals,*

Plaintiffs,

v.

Civil Action No. 3:25-cv-00474-REP-MRC

BELVEDERE NRDE, LLC, PEGASUS  
RESIDENTIAL, LLC, and GLENMOOR OAKS  
NRDE, LLC,

Defendant.

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS**

Plaintiffs Maria Camila Valencia Rios, Aquarius Filali, and Nadji Filali, on behalf of themselves and the Settlement Class Members, and by counsel, respectfully move the Court pursuant to Rule 23 of the Federal Rules of Civil Procedure for service awards in the amount of \$15,000 per Plaintiff and an award of attorneys' fees and costs in the amount of \$1,287,333.33. Plaintiffs request these awards for the reasons set forth in their contemporaneously filed memorandum in support of their motion.

Respectfully submitted,  
**PLAINTIFFS**

By: /s/ Kristi C. Kelly  
Kristi C. Kelly, VSB #72791  
Matthew G. Rosendahl, VSB #93738  
Kelly Guzzo, PLC  
3925 Chain Bridge Road, Suite 202  
Fairfax, VA 22030  
(703) 424-7572 - Telephone  
(703) 591-0167 - Facsimile

Email: [kkelly@kellyguzzo.com](mailto:kkelly@kellyguzzo.com)

Email: [matt@kellyguzzo.com](mailto:matt@kellyguzzo.com)

*Counsel for Plaintiffs*