

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION
CASE No.: 4:22-CV-33-BO

HANK BLAND, KENDELL)
JACKSON, LUETTA INNIS, for)
themselves and all others similarly)
situated,)
))
Plaintiffs,)
))
v.)
))
CAROLINA LEASE MANAGEMENT)
GROUP, LLC, CTH RENTALS, LLC,)
and OLD HICKORY BUILDINGS,)
LLC,)
))
Defendants.)
_____)

**PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND
COSTS AND PAYMENT OF
CLASS REPRESENTATIVES'
SERVICE AWARDS**

Plaintiffs Hank Bland, Kendell Jackson, Luetta Inniss (collectively “Plaintiffs”), pursuant to Rule 23(h) of the Federal Rules of Civil Procedure and Local Rule 7.1, respectfully move this Court for a Fee and Costs Award to Class Counsel and Awards to the Class Representatives in accordance with the Settlement Agreement and Release in this action and as described more fully in the Memorandum of Law filed in support of this Motion. Plaintiffs move this Court as follows:

1. Plaintiffs request fees and costs equivalent to Thirty-Three Per Cent (33%) of the Settlement Fund of \$6,998.328.87 as provided for in the Settlement Agreement, totaling \$2,309,448.53. Plaintiffs further request Service Awards to the Class Representatives of \$10,000.00 each, for their participation in this Action and

their service to the Class as provided for in the Settlement Agreement. ECF No. 100, 100-1 (Settlement Agreement).

2. Plaintiffs incorporate the attached Declaration of Counsel in Support of Plaintiffs' Request for Service Awards for the Class Representatives as Exhibit 1.

3. Settling Defendants Carolina Lease Management Group, LLC and CTH Rentals, LLC do not oppose this motion.

4. The basis for this Motion is set forth in the Memorandum of Law filed contemporaneously hereto.

WHEREFORE, Plaintiffs respectfully pray this Court for the following relief:

1. That this Court grant Plaintiffs' Unopposed Motion for a Fee and Costs Award,

2. That this Court award the Class Representative a Service Award of \$10,000.00 each; and

3. For such other and further relief as this Court deems just and proper.

This the 23rd day of September, 2025.

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that the foregoing PLAINTIFFS' UNOPPOSED MOTION FOR AWARD OF FEES AND COSTS AND SERVICE AWARD FOR CLASS REPRESENTATIVES was served via the CM/ECF system on the attorneys listed below:

Mr. Jonathan Williams
Mr. Craig Martin
Cedar Grove Law
Post Office Box 1389
Hillsborough, NC 27278

This the 23rd day of September, 2025.

LAPAS LAW OFFICES, PLLC

By: *s/ Adrian M. Lapas*
Adrian M. Lapas
Attorney for Plaintiffs