

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**CINDY RODRIGUEZ, STEPHEN GIBBS,)
PAULA PULLUM, YOLANDA CARNEY,)
JACQUELINE BRINKLEY, CURTIS)
JOHNSON, FRED ROBINSON, et al.,)**

Plaintiffs,

v.

Case No. 3:15-CV-01048

**PROVIDENCE COMMUNITY)
CORRECTIONS, INC.,)**

RUTHERFORD COUNTY, TENNESSEE,)

**JASMINE JACKSON, BRIANA)
WOODLEE, AMANDA ROBERTS,)
TIARA SMITH, KELLY HALEY,)
AMANDA SCHEXNAYDER, KAYLA)
BANKS, KELLY MCCALL,)**

Defendants.

**MOTION TO AUTHORIZE COMPENSATION OF
COUNSEL’S ATTORNEYS’ FEES AND LITIGATION EXPENSES**

Intervening party Equal Justice Under Law (“EJUL”),¹ moves this Court pursuant to Fed. R. Civ. P. 54(d) to authorize the compensation to EJUL of attorney’s fees and litigation expenses from the Settlement Fund in this matter.

As authorized by the Settlement Agreement between the parties, EJUL seeks the initial recovery of \$827,368.50 in reasonable attorney’s fees, plus compensation of reasonable out-of-pocket litigation expenses in the amount of \$14,992.30. Such recovery is approved by the settlement agreement reached between the named plaintiffs and defendants in this matter, and

¹ Equal Justice Under Law is a party to the settlement agreement submitted to the Court for approval (the “Settlement Agreement”) (Dkt. 192-1) and has been allowed to participate in this matter for the limited purpose of filing this petition for recovery of fees and expenses. *See* Dkt. 178.

results from EJUL's work as counsel to the named plaintiffs from the inception of the case until September 2016.²

EJUL has filed with this motion a memorandum of law and a Notice of Filing containing supporting declarations with exhibits, and respectfully requests that the Court approve, as contemplated in the settlement agreement (i) compensation of EJUL from the Settlement Fund in the amount of \$413,684.25 to be paid – in accordance with the Court's January 2, 2018 Order – upon the approval by the Court of this petition; (ii) compensation of EJUL from the Settlement Fund in the amount of \$413,684.25 upon final administration of the settlement and subject to the availability of funds following such administration and (iii) expenses in the amount of \$14,992.30.

Respectfully submitted,

SHERRARD ROE VOIGT & HARBISON, PLC

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² The Settlement Agreement also contemplates the filing of an additional petition, in the event that funds remain in the Settlement Fund after the full administration of the claims process. See Section VI. A. (iii) of the Settlement Agreement (authorizing a request for an "Additional Attorneys' Fee Award" (as that term is defined in the Settlement Agreement)).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent to all counsel of record via the District Court's electronic filing system on this 13th day of February, 2018.

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/s/ J. Scott Hickman
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