

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

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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.,))	(Class Action)
)	
RUTHERFORD COUNTY, TENNESSEE,))	
)	
JASMINE JACKSON, BRIANA))	
WOODLEE, AMANDA ROBERTS,))	
TIARA SMITH, KELLY HALEY,))	
AMANDA SCHEXNAYDER, KAYLA))	
BANKS, KELLY MCCALL,))	
)	
Defendants.))	
)	
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**PLAINTIFFS’ RULE 54(d) MOTION TO AUTHORIZE COMPENSATION OF CLASS
COUNSEL’S ATTORNEYS’ FEES AND LITIGATION EXPENSES**

Comes now former counsel for Plaintiffs Baker Donelson Bearman Caldwell & Berkowitz, PC (“Baker Donelson”) and moves this Honorable Court pursuant to FRCP 54(d) to authorize the compensation of attorney’s fees and litigation expenses from the settlement fund.¹

Pursuant to the Settlement Agreement reached by the parties, Baker Donelson ultimately seeks the following total compensation in fees, plus compensation of any reasonable out-of-pocket litigation expenses: \$185,920 in attorney’s fees, and \$5,546.56 in litigation expenses.

¹ ECF 192-1, Settlement Agreement, at 13.

However, in accordance with the Court's January 2, 2018 order, and to ensure that funds are available for all class claimants, this motion seeks immediate compensation of only half of the agreed amounts, plus reasonable out-of-pocket litigation expenses. (ECF 197, Order, at 3). Thus, Baker Donelson seeks the following immediate compensation: \$92,960 in attorney's fees, and \$2,773.28 in litigation expenses.

Baker Donelson contemporaneously submits a memorandum of law and supporting exhibits, and respectfully requests that the Court approve the immediate compensation of Baker Donelson from the Settlement Fund in the amounts of **\$92,960 in attorney's fees, and \$2,773.28 in litigation expenses**. Baker Donelson further requests that the Court grant preliminary approval to the full amounts contemplated in the Settlement Agreement, subject to the availability of funds once the claims process is complete.

Respectfully submitted,

s/ Jonathan Cole

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s/Matthew G. White

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CERTIFICATE OF SERVICE

I hereby certify that on **February 20, 2018** a copy of the foregoing **Rule 54(d) Motion for Attorney's Fees and Litigation Expenses** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, including:

- Attorneys for Pathways Community Corrections, Inc. and the Individual Defendants: Lisa Rivera, Kathryn Walker, and David Esquivel of Bass, Berry, & Sims, PLC.
- Attorneys for Pathways Community Corrections, Inc.: Manny Abascal and Julie Gerchik of Latham & Watkins, LLP.
- Attorneys for Rutherford County: Josh McCreary, Evan Cope, and Blake Garner of Hudson, Reed, & McCreary, PLLC.

s/ Matthew G. White

Matthew G. White