

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SAMANTHA CAMDEN, *on behalf of
herself and all others similarly
situated,*

Plaintiff,

v.

BUCKNELL UNIVERSITY,

Defendant.

Case No. 4:23-cv-01907-MWB

**PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS'
FEES, COSTS, AND CASE CONTRIBUTION AWARD
TO SETTLEMENT CLASS REPRESENTATIVE**

Through undersigned counsel, Plaintiff Samantha Camden ("Plaintiff") respectfully moves this Court for approval of reasonable attorneys' fees, costs, and case contribution award to Settlement Class Representative pursuant to the proposed Stipulation of Settlement that this Court preliminarily approved in its Order dated February 5, 2025. Plaintiff moves for an award of attorneys' fees in the amount of \$383,295 and litigation expenses in the amount of \$7,281.09 with such amounts to be paid from the Settlement Fund in accordance with the terms of the Settlement. Plaintiff additionally moves for a Case Contribution Award to the Settlement Class Representative in the amount of \$5,000.00. In further support of this Motion,

Plaintiff refers the Court to the contemporaneously filed memorandum of law and the Declaration of Nicholas A. Colella.

Dated: April 21, 2025

Respectfully submitted,

/s/ Nicholas A. Colella

Nicholas A. Colella

PA ID No. 332699

LYNCH CARPENTER, LLP

1133 Penn Avenue, 5th Floor

Pittsburgh, PA 15222

Phone: (412) 322-9243

NickC@lcllp.com

Anthony Alesandro, Esq.*

Leeds Brown Law, P.C.

1 Old Country Road, Suite 347

Carle Place, NY 11514

516.873.9550

aalesandro@leedsbrownlaw.com

**Pro Hac Vice*

Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATION OF CONCURRENCE

I hereby certify that I have sought concurrence with counsel for Defendant as to the relief requested in this motion, and Defendant does not oppose.

/s/ Nicholas A. Colella
Nicholas A. Colella

CERTIFICATE OF SERVICE

I hereby certify that, on April 21, 2025, a true and correct copy of the foregoing was filed through the Court's Electronic Case Filing (ECF) System and that the following attorneys of record are registered to receive notice of said filing through ECF:

Michael E. Baughman
TROUTMAN PEPPER HAMILTON SANDERS LLP
3000 Two Logan Square
18th and Arch Streets
Philadelphia, PA 19103
Michael.Baughman@troutman.com

Adam R. Martin
TROUTMAN PEPPER HAMILTON SANDERS LLP
Suite 200, 100 Market Street
P.O. Box 1181
Harrisburg, PA 17108-1181
Adam.Martin@troutman.com

/s/ Nicholas A. Colella
Nicholas A. Colella