

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**PLAINTIFFS' APPLICATION FOR
AN AWARD OF ATTORNEYS' FEES
AND CLASS REPRESENTATIVE
AWARDS**

Pursuant to Fed. R. Civ. P. 23(h) and the settlement obtained in the above-captioned matter, Class Counsel respectfully requests an award of one-third (\$2,000,000.00) of the common fund settlement of \$6,000,0000.00 in attorneys' fees, inclusive of costs, and a \$2,500.00 for service award for Plaintiffs Kelly Vriezen, Sandra Tapp, and Kaye Lockrem.

Class Counsel's request is supported by the attached memorandum, the Declaration of Joint Class Counsel in Support of the Application for an Award of Attorneys' Fees and Service Awards attached as **Exhibit A**, the collective declarations of each firm that participated in the litigation in support of the Application for an Award of Attorneys' Fees and Service Awards attached as **Exhibit B**, the collective declarations of Class Representatives Kelly Vriezen, Sandra Tapp, and Kaye Lockrem attached as **Exhibit C**, and the record in its entirety.

A proposed Order is submitted along with Plaintiffs' Unopposed Motion for Final Approval that is being file contemporaneously.

As detailed in the Settlement Agreement at ¶ 63 and confirmed via correspondence on May 27, 2025, Defendant takes no position with regard to Class Counsel's application for Attorneys' Fees and Expenses Award.

Dated: May 27, 2025

Respectfully submitted,

s/ Bryan L. Bleichner

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