

STATE OF NORTH CAROLINA
COUNTY OF GUILFORD

IN THE GENERAL COURT OF
JUSTICE
SUPERIOR COURT DIVISION
24-CVS-4890-400

ALBERTA STEWART, CRYSTAL
ADKINS-PENNIZ, and ABIGAIL)
HEDGECOCK, individually and on)
behalf of themselves and all others)
similarly situated,)

Plaintiffs)

v.)

GREENSBORO COLLEGE, INC.,)
)

Defendant.)

**MOTION FOR ATTORNEYS' FEES,
EXPENSES, AND SERVICE
AWARDS**

Plaintiffs Alberta Stewart, Crystal Adkins-Pennix, and Abigail Hedgecock (“Plaintiffs”) individually and on behalf of all others similarly situated, hereby move this Court to:

1. Approve an award of reasonable attorneys’ fees in the amount of \$183,333.33;
2. Approve reasonable out-of-pocket costs and expenses in the amount of \$4,899.25, and;
3. Approve a service award for each Plaintiff in the amount of \$3,000.

This Motion is based upon: (1) this Motion; (2) the Memorandum of Points and Authorities in Support of this Motion, filed herewith; (3) the Joint Declaration of Class Counsel, filed herewith; (4) the Settlement Agreement; (4) the records, pleadings, and papers filed in this action; and (5) upon such other documentary and oral evidence or argument as may be presented to the Court at or prior to the hearing of this Motion.

Dated: February 25, 2025

Respectfully submitted,

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

/s/ Scott C. Harris

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*Attorneys for Plaintiffs and the
Settlement Class*

**CERTIFICATE OF COMPLIANCE WITH
BUSINESS COURT RULE 7.8**

The undersigned, in accordance with Business Court Rule 7.8, certifies that the foregoing motion (exclusive of the case caption, signature blocks, and required certificates) contains fewer than 7,500 words, as reported by word-processing software.

This the 25 day of February, 2025.

/s/ Scott C. Harris

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been served on all counsel of record in accordance with Business Court Rule 3.9 through electronic filing with the North Carolina Business Court.

This the 25th day of February, 2025.

/s/ Scott C. Harris _____

*Attorneys for Plaintiffs and the
Settlement Class*