

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

**MARK JONES, MICHELLE GOULD,
DICKY WARREN, and CARL JUNG,** on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

**STURM, RUGER & COMPANY, INC.,
and FREESTYLE SOFTWARE, INC.,**

Defendants.

Case No. 3:22-cv-01233-KAD

August 27, 2025

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF COSTS
AND EXPENSES, AND SERVICE AWARDS**

Pursuant to Federal Rule of Civil Procedure 23 and the Court's May 15, 2025 Preliminary Approval Order [DE # 125] in the above-captioned class action, Plaintiffs Mark Jones, Michelle Gould, Dicky Warren, and Carl Jung, on behalf of themselves and all other similarly situated, respectfully move this Court to:

1. Award reasonable attorneys' fees in the amount of \$500,000 to Class Counsel as compensation for their work in litigating this matter on behalf of the Settlement Class;
2. Award Class Counsel \$35,000 in reasonable costs and expenses; and,
3. Award Plaintiffs Mark Jones, Michelle Gould, Dicky Warren, and Carl Jung, Class Representative Service Awards in the amount of \$3,500 each in recognition of their time, effort, and risk in stepping forward as named Plaintiffs in this litigation.

This Motion is based upon the Memorandum in Support of this Motion, filed herewith; the Joint Declaration of Mason A. Barney, Gary M. Klinger, and Justin C. Walker, filed herewith; the

records, pleadings, and papers filed in this action; and, 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: August 27, 2025

Respectfully submitted,

/s/ Justin C. Walker

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Attorneys for Plaintiffs and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2025, I served the foregoing upon counsel for all parties by filing it with the Clerk of the Court by using the CM/ECF system in accordance with Fed. R. Civ. P. 5(b)(2)(E).

/s/ Justin C. Walker

Justin C. Walker (admitted *pro hac vice*)