

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CHEYNE NORMAN and SOPHIA WESCOTT,  
individually, and on behalf of a class of similarly  
situated individuals,

PLAINTIFFS,

v.

NISSAN NORTH AMERICA, INC.

DEFENDANT.

**Case No. 3:18-cv-00534**

Judge William L. Campbell, Jr.  
Magistrate Judge Alistair E. Newbern

Date: March 6, 2020

Time: 1:30 p.m.

Courtroom: 874

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS,  
AND CLASS REPRESENTATIVE SERVICE AWARDS**

Plaintiffs Cheyne Norman and Sophia Wescott (the "Class Representatives"), on behalf of themselves and on behalf of themselves and on behalf of a preliminarily certified Settlement Class<sup>1</sup> of current and former owners and lessees of 2013-2017 Nissan Juke vehicles equipped with a Continuously Variable Transmission or "CVT" ("Class Vehicles"), hereby move for attorneys' fees, costs, and class representative service awards. The Class Representatives request that the Court award: (1) \$588,208.08 in attorneys' fees, (2) \$26,791.92 for out-of-pocket litigation expenses to Class Counsel, and (3) service awards totaling \$10,000, in the amount of \$5,000 to each Class Representative.

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<sup>1</sup> Unless otherwise defined herein, capitalized terms are defined in Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement, filed simultaneously.

The requested fees are reasonable as a percentage of the benefits conferred on the Class which value between \$17,018,000 and \$22,841,000. The requested fees are also reasonable under the lodestar method, as they are of product of reasonable hours and reasonable rates enhanced by a modest multiplier of 1.64.

This Motion is based on the accompanying Memorandum of Points and Authorities and the exhibits thereto, any briefs filed in support, and the papers, records, and pleadings on file herein.

Dated: January 24, 2020

Respectfully submitted,

/s/ Cody R. Padgett

Raúl Pérez  
Cody R. Padgett  
Tarek H. Zohdy  
Trisha K. Monesi  
Capstone Law APC  
1875 Century Park East, Suite 1000  
Los Angeles, California 90067  
Telephone: (310) 556-4811  
Facsimile: (310) 943-0396  
Raul.Perez@capstonelawyers.com  
Tarek.Zohdy@capstonelawyers.com  
Cody.Padgett@capstonelawyers.com  
Trisha.Monesi@capstonelawyers.com

Gregory F. Coleman (BPR No. 014092)  
Adam A. Edwards, BPR No. 23253  
Lisa A. White (BPR No. 026658)  
GREG COLEMAN LAW PC  
First Tennessee Plaza  
800 S. Gay Street, Suite 100  
Knoxville, Tennessee 37929  
Telephone: 865-247-0080  
Fax: 865-522-0049  
greg@gregcolemanlaw.com  
adam@gregcolemanlaw.com  
lisa@gregcolemanlaw.com

Caroline Ramsey Taylor  
John C. Whitfield  
WHITFIELD BRYSON & MASON, LLP  
518 Monroe Street  
Nashville, TN 37208  
Telephone: (615) 921-6500  
Facsimile: (615) 921-6501  
caroline@wbmlp.com  
john@wbmlp.com

Gary E. Mason  
WHITFIELD BRYSON & MASON, LLP  
5101 Wisconsin Ave., NW  
Suite 305  
Washington, D.C. 20016  
T: (202) 429-2290  
F: (202) 429-2294  
gmason@wbmlp.com

Lawrence Deutsch  
Russell D. Paul  
Jeffrey L. Osterwise  
BERGER & MONTAGUE, P.C  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4604  
rpaul@bm.net  
ldeutsch@bm.net  
josterwise@bm.net

*Attorneys for Plaintiffs and the Class*