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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING**

ALEXANDER BARRY, individually and on
behalf of all others similarly situated;

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No. 20-2-13924-6-SEA

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES, COSTS, AND
SERVICE AWARD**

WHEREAS, a class action is pending before the Court entitled *Barry v. University of Washington*, Case No. 20-2-13924-6-SEA (the "Action"); and

WHEREAS, Plaintiff Alexander Barry ("Plaintiff") and Defendant, the University of Washington ("Defendant" or "UW") (collectively, the "Parties") have entered into a Class Action Settlement Agreement, which, together with the exhibits attached thereto, sets forth the terms and conditions for a proposed settlement and dismissal of the Action with prejudice upon the terms and conditions set forth therein (the "Settlement Agreement"),

WHEREAS, Plaintiff seeks attorneys' fees, costs, and a service award pursuant to the Settlement Agreement and the Court having read and considered the motion and exhibits attached thereto;

This matter coming before the Court upon the agreement of the Parties, good cause being shown, and the Court being fully advised in the premises,

IT IS HEREBY ORDERED, DECREED, AND ADJUDGED AS FOLLOWS:

1 1. The Court finds that Class Counsel has achieved an excellent Settlement for the
2 Settlement Class. Given the substantial results obtained for the Settlement Class, the efforts and
3 skill shown by Class Counsel in investigating and bringing this class action to a successful
4 resolution, and the considerable risk Class Counsel incurred in pursuing this matter on a
5 contingency basis, the Court finds that Plaintiff’s and Class Counsel’s request for an award of
6 \$1,200,000, representing approximately 30% of the Settlement is reasonable and will be awarded.

7 2. The Court further finds that an award of \$355,015.69 in expenses is reasonable and
8 will be awarded.

9 3. The Court finds and concludes that the requested fee awards are fair and reasonable
10 for numerous reasons, including the following:

11 a. The total value of the Settlement is \$4,000,000. In awarding Class Counsel
12 its reasonable attorneys’ fees and litigation expenses, the Court has considered the total amount of
13 benefits afforded by the Settlement.

14 b. Under the percentage-of-the-recovery approach, Class Counsel’s fee award
15 represents 30% of the Settlement. Given the amount of work that Class Counsel completed and
16 the posture of the action before settlement, such an award easily falls within the range of awards
17 routinely granted by courts in Washington.

18 4. Based on the foregoing, the Court **GRANTS** Plaintiffs’ and Class Counsel’s
19 application for an award of attorneys’ fees in the amount of \$1,200,000, costs in the amount of
20 \$355,015.69, as well as \$104,490.00 for the cost associated with Settlement Administration
21 services.

22 5. The Court has also considered the application for a service award of \$7,500 to the
23 Class Representative. The Court finds that Class Counsel’s request for a service award is fair and
24 reasonable. *See* *McLaughlin on Class Actions* § 6:28 (“[I]t is fair and reasonable to compensate
25 class representatives, ordinarily within the range of \$1,000-\$20,000, for the efforts they make in
26 obtaining a recovery on behalf of the class.”).

27 6. The Court finds that the time and effort Plaintiff devoted to this matter contributed
28 to the overall result and benefited the Settlement Class. Here, the successful outcome in this case

1 would not have been possible without the efforts of Plaintiff, and his initiative and efforts on behalf
2 of the Settlement Class should be rewarded. The Court hereby **GRANTS** a service award of \$7,500
3 to Plaintiff.

4 IT IS SO ORDERED, this _____ day of _____, 2025.

6 _____
7 The Honorable Sean O'Donnell

8 Proposed Order Submitted By:

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