

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: MOVEIT CUSTOMER DATA
SECURITY BREACH LITIGATION

MDL No. 1:23-md-03083-ADB-PGL

Judge Allison D. Burroughs

This Document Relates To:
C.A. No. 1:23-cv-12711-ADB

STEPHEN GILMORE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

THE BANK OF CANTON and PROGRESS
SOFTWARE CORPORATION,

Defendants.

**PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND SERVICE
AWARD FOR THE SETTLEMENT CLASS REPRESENTATIVE**

Pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, Plaintiff Stephen Gilmore (“Plaintiff” or “Settlement Class Representative”) respectfully moves for entry for an order:

1. Approving Class Counsel’s request an attorneys’ fees award of one-fourth (25%) of the Settlement Fund, totaling \$75,000.00; and
2. Approving a Service Award of \$5,000.00 to the Settlement Class Representative in recognition of his participation in this case on behalf of the Settlement Class.

In support of his motion, Plaintiff relies on the accompanying memorandum of law and supporting Declaration of Gary F. Lynch. A proposed order will be submitted to the Court with Plaintiff’s forthcoming motion for final approval of the The Bank of Canton settlement.

DATED: August 19, 2025

Respectfully submitted,

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Plaintiffs' Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that, on this date, the foregoing document was filed electronically via the Court's CM/ECF system, which will send notice of the filing to all counsel of record.

DATE: August 19, 2025

/s/ Kristen A. Johnson
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