

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM McGEE and LEE McGEE,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

CONSTANT CONTACT, INC., et al.,

Defendants.

) No. 1:15-cv-13114-MLW

) CLASS ACTION

) LEAD COUNSEL'S NOTICE OF MOTION
) AND MOTION FOR AN AWARD OF
) ATTORNEYS' FEES AND PAYMENT OF
) LITIGATION EXPENSES, CHARGES AND
) COSTS

PLEASE TAKE NOTICE that on May 27, 2020, at 2:00 p.m. at the United States District Court for the District of Massachusetts, at the John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston, MA 02210, Lead Counsel, Robbins Geller Rudman & Dowd LLP (“Lead Counsel”), will respectfully move this Court, pursuant to Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure, for entry of an order: (a) awarding attorneys’ fees; and (b) awarding litigation expenses, charges and costs incurred by Lead Plaintiff’s Counsel.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Lead Counsel submits and is filing herewith: the Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Payment of Litigation Expenses, Charges and Costs; the Declaration of Stephen R. Astley in Support of: (A) Lead Plaintiff’s Motion for Final Approval of Settlement and Approval of Plan of Allocation, and (B) Lead Counsel’s Motion for Attorneys’ Fees and Payment of Litigation Expenses, Charges and Costs; the Declaration of Ross D. Murray; and the Declarations of Lead Plaintiff’s Counsel.

A proposed order will be submitted with Lead Counsel’s reply submission on May 13, 2020.

DATED: March 30, 2020

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
DARREN J. ROBBINS (*pro hac vice*)
ELLEN GUSIKOFF STEWART (*pro hac vice*)

s/ Ellen Gusikoff Stewart

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Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 30, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Court's Electronic Mail Notice List, and I hereby certify that I have caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Court's Manual Notice List.

/s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART