

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BENITA DIXON, *on behalf of herself and all
others similarly situated,*

Plaintiff,

v.

LINCOLN UNIVERSITY,

Defendant.

Case No. 2:24-cv-01057-KSM

**PLAINTIFF'S MOTION FOR AWARD OF ATTORNEYS' FEES, COSTS, AND CASE
CONTRIBUTION AWARD TO SETTLEMENT CLASS REPRESENTATIVE**

Through undersigned counsel, Plaintiff Benita Dixon ("Plaintiff") respectfully moves this Court for approval of reasonable attorneys' fees, costs, and case contribution award to Settlement Class Representative pursuant to the proposed Settlement Agreement and Release that this Court preliminarily approved in its Order dated May 12, 2025. Plaintiff moves for an award of attorneys' fees in the amount of \$56,494.35 and litigation expenses in the amount of \$2,381.77 with such amounts to be paid from the Settlement Fund in accordance with the terms of the Settlement. Plaintiff additionally moves for a Case Contribution Award to the Settlement Class Representative in the amount of \$2,500.00. In further support of this Motion, Plaintiff refers the Court to the attached memorandum of law and the Declaration of Nicholas A. Colella.

Dated: July 25, 2025

Respectfully submitted,

/s/ Nicholas A. Colella
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**Pro Hac Vice*

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on July 25, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Nicholas A. Colella

Nicholas A. Colella