

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
Southern Division

PAUL MOORE,

*

Plaintiff,

*

v.

*

**REALPAGE UTILITY
MANAGEMENT, INC.,**

*

Case No.: 8:20-CV-00927-PX

*

Hon. Paula Xinis

Defendant.

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**MOTION FOR APPROVAL OF INCENTIVE AWARD TO THE REPRESENTATIVE
PLAINTIFF**

Pursuant to ¶ 22 of the Settlement Agreement in this case (ECF No. 73-1), Plaintiff Paul Moore (“Representative Plaintiff”) respectfully requests that this Court approve an incentive awards to him of \$15,000 – an award which Defendant RealPage Utility Management, Inc. (“RUM”) has agreed to pay separate and apart from the Common Settlement Fund in this case, and which will not diminish or affect the relief to other Settlement Class members. The requested award is warranted because Representative Plaintiff secured the proposed Settlement in this case not only on behalf of himself, but in favor of thousands of other similarly situated consumers. This type of award is both permissible and desirable where, as here, a class action has achieved a significant benefit for a large number of people as the result of a lawsuit filed on their behalf by a class representative.

Further grounds and authorities in support of this Motion are contained in the accompanying memorandum of law, which is incorporated.

WHEREFORE, Representative Plaintiffs respectfully requests that this Court approve an incentive payments to him of \$15,000, and enter the comprehensive proposed Final Order Approving Settlement and Certifying Settlement Class.

Respectfully submitted,

/s/ Benjamin H. Carney

Benjamin H. Carney (Fed. Bar No. 27984)

Martin E. Wolf (Fed. Bar No. 09425)

Richard S. Gordon (Fed. Bar No. 06882)

Gordon, Wolf & Carney, Chtd.

11350 McCormick Rd.

Executive Plaza 1, Suite 1000

Hunt Valley, Maryland 21204

Tel. (410) 825-2300

Fax. (410) 825-0066

bcarney@GWCfirm.com

rgordon@GWCfirm.com

**Attorneys for Representative Plaintiff and the
Settlement Class**